Hi planning.implementation@delwp.vic.gov.au

There has been a submission on Planning for Melbourne’s Industrial and Commercial Land through Engage Victoria.

A copy of the submission is provided as below:

**Planning principles and strategies for employment land.**

The draft Melbourne industrial and commercial land use plan includes principles and strategies to guide planning for industrial and commercial land. (page 32).

Do you think the principles and strategies provide enough clarity and guidance to assist planning for industrial and commercial land?

If no, please let us know why and how they could be improved.
Criteria to identify regionally-significant industrial precincts.

Plan Melbourne identifies state-significant industrial precincts. The draft Melbourne industrial and commercial land use plan identifies regionally-significant industrial precincts and includes criteria used as the basis to identify these locations (page 34).

Do you support the criteria developed to identify regionally-significant industrial precincts?

If no, please let us know why and how they could be improved.

Purpose for regionally-significant industrial precincts and local industrial precincts.

Plan Melbourne outlines a purpose for state-significant industrial precincts. The draft Melbourne industrial and commercial land use plan identifies a purpose for regionally-significant industrial precincts and local industrial precincts (page 35).

Do you support the purpose developed for regionally-significant industrial precincts and local industrial precincts?

If no, please let us know why and how they could be improved.

Developing local industrial land use strategies.
Appendix 2 of the draft Melbourne industrial and commercial land use plan proposes guidance for developing local industrial land use strategies.

**Do you have any comments or suggestions to improve the guidance for developing local industrial land use strategies?**

**Key industrial and commercial areas.**

The draft Melbourne industrial and commercial land use plan identifies and describes key industrial and commercial areas for each of the six metropolitan regions (refer to Part B of the plan).

**Have the key industrial and commercial areas been adequately identified and described across the regions?**

If no, please let us know which other area we should identify or how the areas can be better described.

**Would you like to comment on any other aspects of the plan?**

**If you would like to upload a submission, please do so here.**
I am making this submission:
on behalf of a land owner

Email address (Optional)

I agree to receive emails about my submission if required or project updates.
Yes

Privacy Statement - Draft Melbourne Industrial and Commercial Land Use Plan

What we will do with your submission

The Department of Environment, Land, Water and Planning (DELWP) is committed to protecting personal information provided by you in accordance with the principles of the Victorian privacy laws. The submission you provide to DELWP will be used to inform the finalisation of the Melbourne Industrial and Commercial Land Use Plan.

The information you provide will be made available to DELWP to develop a consultation report. This report will be uploaded to the Melbourne Industrial and Commercial Land Use Plan page on the DELWP website.

The contact information you provide may be used to contact you should we need to clarify your submission or to provide you with project updates.

The submission you provide will be published on the DELWP website. To protect individual privacy, DELWP will remove your name and address from your submission when we receive it.
If you do not wish to be identified, please ensure there is no other information in your submission that could identify you or other individuals.

If you are making comment as an organisation, then your comments may be published, including the name of your organisation.

De-identified submissions may be used by DELWP, or its contracted service providers under confidentiality agreements, in preparing its recommendations to government.

Please note, if you do not provide your name/email address we will not be able to identify your submission if you wish to access it, make a correction, or require technical support.

Should you need to correct the information you provided or gain access to your submission, please contact us via email at planning.implementation@delwp.vic.gov.au

I agree to the privacy statement

yes

To view all of the form’s submissions, visit:


Regards,
The Engage Victoria Team

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Engage Victoria. If you think you have been sent this by mistake please contact us at contact@engage.vic.gov.au.
Engage Victoria
Department of Environment, Land, Water & Planning (DELWP)
PO Box 500
EAST MELBOURNE VIC 8002

via: online portal

Dear DELWP,

Submission on behalf of Leader Products to the draft Melbourne Industrial and Commercial Land Use Plan
465 Hume Highway, Craigieburn

1 Introduction

This submission is made by Tract Consultants on behalf of Leader Products to the draft Melbourne Industrial and Commercial Land Use Plan (the ‘Plan’).

Leader Products owns a significant landholding at 465 Hume Highway, Craigieburn (the ‘Site’) which is adjacent to the Craigieburn Train Station [see Figure 1 – Aerial Plan below].

The Site is currently within the existing Northern State-Significant Industrial Precinct (NSSIP). Accordingly, the Plan has important implications for the Site and our client wishes to outline the planned future strategy for a Transit Orientated Development (TOD) at this location.

Our client understands the importance of providing commercial and industrial land in Melbourne and seeks to ensure the Plan and the subsequent strategic planning directions are also consistent with State and local planning policy regarding development proximate to Activity Centres and train stations.

Further, we wish to ensure that planning mechanisms which guide land use and development for our client’s land will enhance economic viability, while allowing a certain level of flexibility in regard to future land uses in order to achieve appropriate development outcomes at the Site.

This submission seeks adjustment of the NSSIP boundary and for the Plan to acknowledge that the resolution of future land uses for the Site and for the surrounding precinct will be determined through an appropriate Structure Plan process.

This is supported by the following detailed submission.
Figure 1 – Aerial Plan (Source: Onemap and Neosimap) [Site outlined in red]
Site and Surrounds

The Site is located at 465 Hume Highway adjacent to the Craigieburn Train Station - the end of the Metropolitan electrified rail line. This area is currently located within the existing NSSIP as per Map 8 in the Plan (refer to Figure 3 below).

The Site comprises of one parcel of land that is approximately 3.23 hectares in area and is currently used for commercial purposes with a warehouse and office located to the south of the Site. The remaining land is vacant and predominantly flat with pasture grass and scattered planted vegetation.

The surrounding land generally comprises of warehouse / office units with low intensity industrial, manufacturing and commercial operations.

The Site is included within the Victorian Planning Authority’s (VPA) North Growth Corridor (NGC) Plan and is identified as an ‘Existing Urban’ area (see Figure 2 below).

Within the NGC a number of Precinct Structure Plans (PSP) have been approved and have begun to be realised. Key surrounding neighbours within Craigieburn and the broader areas include the Wollert PSP (containing large portions of residential and town centre land), and the Craigieburn North Employment Area PSP (containing mainly industrial zoned land, with the expected uses being for factories, warehouses and manufacturing).

To the south east of the Site is a tank farm and water treatment facility operated by Yarra Valley Water (YWW). Based on correspondence with YWW, it is likely that the treatment plant will be converted to a sealed holding tank system. This is predicted to remove or significantly reduce the requirements for odour buffers between YWW operations and the Craigieburn Train Station precinct which has limited redevelopment and structure planning of the precinct in the past.

Further east is a redundant strip of land (approximately 7.96 hectares), being an unacted upon alignment of the original Hume Freeway.

![Image of Site Location Map](image-url)

Figure 2 – Extract from the North Growth Corridor Plan (Source: VPA) (Site annotated)
Figure 3 – Extract of Map B: Northern Region Future Direction Map - Industrial Land from the Plan [Source: DELWP] [Site annotated]
The Plan has been prepared by DELWP to establish a planning framework to enable State and local governments to better plan for the future employment and industry needs of Melbourne.

Consistent with Plan Melbourne, the Plan identifies the Site as existing State significant industrial land within the NSSIP (Map 8 in the Plan).

The Plan, amongst other things, seeks to protect State significant industrial precincts from encroachment of sensitive land uses that may compromise development and efficient operation of industrial businesses in these locations.

The findings and land use directions of the Plan are broadly consistent with Plan Melbourne and do not propose a significant change in terms of future land use directions for industrial precincts.

Specifically, as it relates to the Site and surrounding NSSIP, the Plan includes the following information:

- The region has a strong and vibrant network of activity centres.
- The Northern SSIP comprises almost 5,385 hectares of existing and future zoned and unzoned land identified for industrial purposes across the municipalities of Hume, Whittlesea and Mitchell.
- By 2031 it is estimated that approximately 144,000 additional jobs will be needed across the region. Over half of the new jobs in the region are expected to be located within the growth area municipalities of Hume and Whittlesea. The industries that are expected to experience the strongest growth are; health care and social assistance; education and training; retail trade; manufacturing; construction.
- Based on projected growth, by 2031 it is anticipated that approximately 1.7 million square metres of additional commercial floorspace will be required across the Northern Region.
- PSPs guide development at a more localised level. PSPs typically make provision for employment and business growth through the development of a network of activity centres that can grow and change over time, and by setting aside sufficient employment land so that businesses can grow and expand into the future.
- Careful consideration will be required through the PSP processes to ensure adequate provision is made to accommodate medium- and longer-term commercial development. Approaches that will support delivery of 20-minute neighbourhoods should be put in place offering a finer grain network of activity centres.
- Investigate and identify areas within regionally-significant industrial precincts that could support other employment uses, including offices, creative industries and start-ups, that support or are well connected to adjacent employment uses or transport connections.
- Ensure that planning for future activity centres in growth areas makes adequate provision to accommodate longer-term commercial and employment needs.
- Non-industrial uses such as accommodation or retail uses which are best located in activity centres.

In summary, the Plan concludes that planning in the SSIP should, amongst other things:

- Investigate and identify regionally-significant industrial precincts that could support other employment uses, including creative industries, that support or are well connected to adjacent employment uses or transport infrastructure.
- Consider the future demand for and need for commercial and employment land across the growth areas and ensure that PSPs make adequate and sufficient provision to accommodate longer-term commercial and employment needs.
Local Planning Policy

As identified by Clause 21.01-2 of the Hume Planning Scheme, some of the key issues facing Hume are growing and diversifying the local economy. The policy concedes that a lack of job diversity (particularly professional services) contributes unemployment and results in large numbers of residents working outside the municipality.

In response, the policy concedes that:

"It is critical that Hume’s employment base expands and diversifies to accommodate the anticipated decline of the manufacturing section, and the municipalities growing population.”

Hume comprises of a number Activity Centres (including Craigieburn Plaza and Craigieburn Central) that predominantly provide retail uses that are largely population driven. As such, these retail Activity Centres are expected to continue to develop and improve to meet the needs of the growing population.

This approach can be readily supported.

However, the Hume Planning Scheme acknowledged there has been limited action on providing job opportunities that are not population driven and that are not readily provided within the municipality. Namely, being professional services including professional consultancies, economic sectors, and health precincts.

To help achieve this, Hume Planning Scheme suggests:

"This will require large areas of new employment land, as well as new large-scale office, health and education precincts."

As such, Hume acknowledges the barriers to increasing the provision of professional services includes the lack of efficient public transport and availability of employment land. As such, it is important that land within a walkable catchment of the Craigieburn Train Station is assessed to meet such a demand.

Craigieburn is at the northern end of the northern electrified rail line and like other such stations it performs a major hub role.

This land use and development vision is reflected in the Hume Integrated Growth Area Plan 2014 [HIGAP], which is Hume’s strategy to guide and manage growth and change within the municipality to 2040. In summary, the HIGAP study identifies the following:

- Page 3: the challenges that the Hume Corridor faces are a lack of local access to a diverse range of jobs, tertiary education, hospital facilities, entertainment and cultural activities, and adequate public transport.
- Page 5: Leader Product’s land is noted as ‘existing employment land’.
- Page 8: develop and approve plans for activity centres which provide numerous opportunities for a wide range of businesses and service providers.
- Page 23: to maximise the economic and land use benefits of transport infrastructure investment: Plan for and support development intensification along Craigieburn Road, around new train stations and within activity centres.
Strategic Direction of the Craigieburn Train Station Precinct

As stated above, the Site is located in the suburb of Craigieburn within the northern portion of the City of Hume.

Hume, together with Whittlesea and parts of Mitchell, form the NGC, which plays a crucial role in meeting the demands of Melbourne’s growing population. Regional planning for the NGC will ultimately see the urban area of Metropolitan Melbourne extend to encompass Beveridge and Wallan.

Hume is a key gateway to the north of Melbourne that enjoy excellent access to freeways and arterial roads, providing good accessibility to the Melbourne Central Business District (CBD), Melbourne Airport and the Port of Melbourne. Hume also has commuter rail links through the Upfield, Craigieburn and Sunbury lines, and freight links via the national rail line running from Melbourne to Sydney.

Plan Melbourne anticipates Melbourne’s population will reach approximately 8 million residents by 2051 with Victoria’s population growing to over 10 million. Victorian Future 2019 has now increased that estimate, with Victoria remaining the fastest-growing state in the country with the population expected to reach 11.2 million by 2056.

Population growth will primarily be driven by greenfield development with Hume’s population predicted to grow rapidly from 198,500 in 2016 to 345,500 by 2041 and will ultimately be around 420,000 once all current growth area land is developed.

The Northern Region map in Plan Melbourne identifies the land proximate to Craigieburn Train Station as a Major Activity Centre (MAC), which are defined as:

'Suburban centres that provide access to a wide range of goods and services. They have different attributes and provide different functions, with some serving larger subregional catchments.'

As such, MACs represent an opportunity for TODs around multi-modal transport junctions.

TODs incorporate a range of uses including: housing, employment clusters, health and education precincts, and light industrial precincts. These uses are required to support future population growth and create employment diversity close to established townships.

Plan Melbourne reinforces the importance of encouraging commercial activity within Activity Centres and proximate to public transport routes to maximise the significant investments made to existing infrastructure and services to facilitate economic growth and manage the cost of living.

However, the Craigieburn Train Station precinct remains largely barren in terms of Activity Centre outcomes which contrasts a number of train stations situated on the Craigieburn Train Line that provide for TOD style developments (refer to Figure 4 – Map of Outer Suburban Town Centres).

The City of Hume has also sought to recognise the importance of Activity Centres and the appropriate outcomes guided by the Structure Plan process. The Hume Activity Centre Hierarchy Study (September 2004) (the ‘Study’) was prepared in response to Melbourne 2030 (Plan Melbourne’s predecessor) and developed long-term strategies for Activity Centre development within Hume. The Study reiterates the importance the metropolitan area as a ‘city of cities’ (a vision supported by Plan Melbourne and built upon through the ‘20 Minute City’ ideal). These ‘cities’ are made up of Activity Centres that incorporate a full range of:

‘retail, commercial, recreational, civic and ceremonial activities, in addition to housing... in a greatly improved public transport system.’

The Study’s responses to Melbourne 2030 included (inter alia):

• ‘Activity centres planned in growth areas should be recogni...
• Structure plan guidelines should be provided for new activity centre development (to be
developed by the State Government).

• Structure plans should guide the extent of development in activity centres, and the appropriateness
of bulky goods retailing in or around activity centres.’

In addition, some of the weaknesses of Humed’s Activity Centres were seen to be:

• ‘Car based centre

• Lack of rail services to the site, although rail is available in the vicinity

• Land is limited within the centre for development - any new development would need to utilise car

parking space’

In response, the Study suggested the following actions:

• ‘Structure plan to better integrate precincts within the Centre and between the Centre and surrounding
areas to encourage pedestrian, cycling and public transport usage

• Review land stock needs exploring opportunities to redevelop areas towards the rail station,
including the older service industry area’

The Plan is consistent with the above, stating that to support planning for industrial and commercial land
consideration should be given to the following:

‘Councils should prepare and implement municipal-wide..activity centre strategies to guide future
development.’

As such, it is clear from State and local government strategic planning policy that appropriate
commercial and mixed-use development and activity close should be located proximate to Activity
Centres and co-located with train stations or other transport options.

Hume has also expressly supported Structure Plan processes be utilised to effectively facilitate
appropriate development around Activity Centres.
6 Strategic Recommendations for the Craigieburn Train Station Precinct

This submission supports the overall intention of the Plan and the need to protect and provide for industrial / employment land. We also recognise that Hume benefits from access to major freeways and freight routes that makes the Municipality an ideal location for industrial / employment land. However, given the State and local strategic direction regarding Activity Centres (outlined above) we see the need for future work to fully determine the most appropriate form of employment land within the precinct.

Further, there are a variety of PSPs either completed or currently being completed by the VPA in the surrounding area. The PSP or Structure Plan process is the most appropriate planning tool to guide the development of Activity Centres such as at the Craigieburn Train Station precinct. Such an analysis will provide an economic and social assessment of the current trends in Hume in regard to the demand for industrial / commercial / mixed use land in the precinct. As such, the Plan should have more regard to the State government’s work relating to Activity Centre planning and the Structure Plan / PSP process to provide the most appropriate land use mix outcome for the precinct.
Accordingly, we respectfully submit that the Site and surrounds are best assessed and planned via the Structure Plan process, which in our view will deliver an improved commercial and mixed-use outcome for this precinct.

In support of this, we provide the following:

The removal of the current nomination as ‘industrial land’ at the Craigieburn Train future TOD precinct will allow appropriate development consistent with overall State and local planning policy and direction at such key rail hub connections

The State and local planning policy support a a mixed-use, employment-based precinct around the Craigieburn Train Station. This outcome would readily accommodate the creation of professional service jobs and the delivery of better access to services and facilities for the growing population of Hume. As such, this provides a more appropriate outcome than the allocation of the Site for industrial uses might – which is generally a lower density of jobs and would not attract as many local employees as professional services would.

A mixed-use TOD concept is particularly supported by Plan Melbourne, which emphasises the importance of locating appropriate mixed-use developments in Activity Centre, close to public transport infrastructure that provide integration between employment services and residential communities. Such an appropriate development would directly respond to Direction 1.2 and 1.3 of Plan Melbourne which identifies that outer suburbs have less access to jobs and seeks to ensure employment occurs within Activity Centres. Further, the Directions recommend the identification of urban renewal sites that benefit from excellent public transport access, with opportunities identified as originating from:

‘...brownfield sites, former industrial areas or underutilised or surplus government land’.

In addition, the vision for a jobs-based TOD responds to Actions 12 and 13 of Plan Melbourne by providing for future employment growth, creating a diversity of employment opportunities and ensuring that the land designated for employment can be considered for other appropriate alternative uses (e.g. professional services as opposed to industrial).

The potential for integrated land use and transport for Craigieburn also directly aligns with the Planning Policy Framework at Clause 18.01-1S, which states:

‘Plan urban development to make jobs and services more accessible by:

- Focussing major government and private sector investments in regional cities and centres on major transport corridors, particularly railway lines, in order to maximise the access and mobility of communities.’

The need for integrated land use and transport planning along the Craigieburn Line is also identified in the Australian Government’s Infrastructure Australia Priority List 2019.

Furthermore, the vision is supported by the directions and initiatives of the metropolitan strategic document in regard to creating ‘20-minute neighbourhoods’ – giving people the ability to meet most of their everyday needs within a 20-minute walk, cycle or local public transport trip from their home. Appropriate development of the Site and surrounds will assist in securing jobs within the northern corridor close to an established residential community with existing services and public transport.

Further, an appropriate development could also be utilized to improve road connections, parking access, and pedestrian links throughout the precinct.

As such, we respectfully submit that, consistent with Plan Melbourne and the Planning Policy Framework, a Structure Plan of the Site and surrounds will facilitate a more cohesive mix of land uses that will foster additional local employment. An appropriate development would also utilise the end of the electrified rail
line at the base of the NGC. The current utilisation of land around the station does not reflect this designation. Structure planning for the area will fulfil its important role as a MAC in an economically and socially beneficial TOD model of urban redevelopment.

The proposed land use vision offers an improved employment outcome.

Whilst the Site and immediate surrounds is identified within the NSSIP, it is submitted that the Site is better suited for higher order employment services which include: health, office, and research, at this location.

We acknowledge that Hume will undergo significant population increase over the next 20-30 years and we understand that there is a commitment from Hume to encourage residents to live and work within the municipality. This population increase is expected both from growth of existing residential areas and from a number of local PSPs, such as: Craigieburn (R2), Craigieburn West, Shenstone Park, English Street, Wollert, and Aurora (refer Figure 5 – Surrounding PSPs).

It is identified that a significant portion Hume and Whittlesea’s residents are travelling into the Melbourne CBD or other municipalities for work. This trend is expected to continue unless the NGC can provide for land allocation for higher order employment services.

Given the Site’s strategic location, the designation of ‘industrial’ is not deemed capable of providing for these higher order services. The vision for the TOD redevelopment provides a significantly improved employment outcome than if the Site were to remain industrial.

It is now timely that a Structure Plan for the Craigieburn Train Station TOD Precinct be prepared. The consequent rezoning of the Craigieburn Train Station precinct will allow and appropriately facilitate the redevelopment of the Site for higher order services which benefit from excellent access to public transport. This outcome directly responds to the Plan, which concludes that planning in the SSIP should, amongst other things:

- ‘Investigate and identify regionally-significant industrial precincts that could support other employment uses, including creative industries, that support or are well connected to adjacent employment uses or transport infrastructure.
- ‘Consider the future demand for and need for commercial and employment land across the growth areas and ensure that PSPs make adequate and sufficient provision to accommodate longer-term commercial and employment needs.’

A Structure Plan process could also provide for development contributions which could provide for, amongst other things, improved road and pedestrian access to the area which is, in our view, currently disjointed.

An increased resident population is also expected to stimulate demand for regional services, such as health and education, which could be located within the Craigieburn Train Station area to further provide employment opportunities and enable residents to live and work close to home.

In summary, the Craigieburn Train Station and surrounds will be better utilised for higher order commercial uses that are well supported by State and local planning policy. As such, the boundary of the NSSIP should be adjusted to reflect this and provide that a Structure Plan should control future land use and development for the area.
7 Recommendations to the Plan

The Site is in close proximity to the Craigieburn Train Station MAC. As outlined in Plan Melbourne and the State and local Planning Policy Framework there is support for an opportunity to provide a mixed-use TOD precinct through an adaptable land use framework and a design response that addresses current demand and expected population growth and also responds to the locational opportunities.

As outlined above, the current zoning and designation as ‘industrial’ within the Plan would make this outcome an impossibility.

The best planning tool to realise such a precinct is through a Structure Plan process.

As such, we submit the following summary notes:

- The Plan should have more regard to State and local Planning Policy Framework which emphasises the importance of locating appropriate mixed-use developments in locations near Activity Centres and public transport infrastructure. As such, the Plan should also recognise that the Structure Plan or PSP process is best to facilitate such an outcome.

- The Craigieburn Train Station and surrounds are better utilised for higher order commercial uses, supported by State and local planning policy. As such, the boundary of the NSSIP should be adjusted to reflect this and facilitate a future Structure Plan for the area.

8 Conclusion

The Plan is an important document that underpins the future direction of development of the Site and the Craigieburn Train Station precinct. It is therefore important for DELWP to adequately consider the potential impact the strategic designation of Plan has on the future of this land.

Leader Products seeks a review of the extent of the NSSIP as it relates to 465 Hume Highway, Craigieburn and the broader Craigieburn Train Station precinct.
We look forward to the Department’s consideration of this matter and would be happy to discuss our submission with you.

Should you have any queries or require further information, please do not hesitate to contact the undersigned.

Yours sincerely,

[Name]

Director of Town Planning
Tract