Submission to Planning for Melbourne’s Industrial and Commercial Land

Thank you for the opportunity to provide feedback to Planning for Melbourne’s Industrial and Commercial Land Use Plan (the Plan). Council acknowledges the collaboration in preparing the Plan and the level of detail provided in identifying the current and future employment trends.

The Plan aligns with the outcomes of Council’s Economic Development Strategy and Whittlesea 2040, A Place for All to ensure that the City of Whittlesea develops and sustains a strong local economy and employment opportunities for its community. Therefore, the City of Whittlesea is generally supportive of the Plan and the outcomes it seeks to achieve. The following comments request changes to the Plan to further support these outcomes particularly in the Northern Region.

Planning principles and strategies for employment land and Developing local industrial land use strategies.

As a growth area Council, the City of Whittlesea has a strong record in planning for employment precincts including the necessary infrastructure to support them. Such planning has contributed to the success of existing precincts in Thomastown, Bundoora and Epping along with the establishment of highly successful new precincts including the Cooper Street and Cooper Street West Employment Precincts. The Cooper Street/Epping precinct comprises the Melbourne Wholesale Fruit, Vegetable and Flower Market, public and private hospitals and a vibrant employment hub of mixed uses. These employment precincts are critical to supporting new residential precincts with access to local jobs.

In respect to the future planning of remaining growth area precincts, Council requests that employment land uses be prioritised both in terms of maximising employment opportunities but also the locational attributes of particular precincts. This is a particularly pertinent to the Northern Quarries Investigation areas and other locations in the Northern Growth Corridor Plan where land uses have not been fully resolved. Council submits that residential land uses have adequate supply in the region and that securing more employment land to be of the more critical need.
Whilst, the principles and strategies to guide planning for industrial and commercial land generally appear sound, Council recommends that additional (or amendments) strategies be incorporated to support Principle 1 to strengthen the priority given to employment land uses in the planning for new growth precincts.

Further, it is noted that some employment precincts have previously been identified based on the constraints of the land for other uses rather than the determining the best locations for particular employment uses and it is recommended that this outcome be avoided through these principles and strategies.

In respect to the Principle 3, Council broadly supports the strategy which states;

*Land identified as being of local significance for industrial purposes should only be considered for mixed-use or residential purposes where strategic analysis can clearly demonstrate that the land is no longer required for industry, business or employment purposes.*

The strategy identifies that Councils should prepare an Industrial Land Use Strategy to inform changes to local industrial areas. It is submitted that whilst this may appropriate in some circumstances, that there be other strategic documents and strategies that could support policy for industrial areas particularly in a growth area context or in local areas where there are clearly identifiable industrial/employment precincts. These may include precinct structure plans, local structure plans, strategy plans, broader land use strategies or the like. It is considered that the content contained in Appendix 2 may be more suited to an established area context and greater consideration should be given to its application in a growth area or regional context.

It is requested that this be recognised in the strategy by amending the strategy to read:

*Councils should undertake an industrial land use strategy or similar strategic work for precincts, to support their planning policies for industrial land.*

Council suggests that additional criteria to determine the appropriateness of the strategic analysis be provided to guide Council in its role as the planning authority.

**Key industrial and employment areas**

As outlined above, employment land is a priority of Council’s and it requests the State Government to prioritise and maximise further opportunity in our areas for employment purposes in the Northern Region, whilst building on the locational attributes. It is recommended that *Planning the Region* prioritises employment land in the planning for growth area precincts particularly those where the land uses have not been fully resolved such as the Northern Quarries Investigation Area.

With the industry statistics available in the Plan, it is important to highlight the opportunity to identify the types of uses the employment land will support. A consideration would be to have State identified precincts to support industry sector growth and competitive advantage, i.e. Health and Food. It is worth noting that despite the decline in traditional manufacturing, the north is considered as a Food Hub with the growth of the food and beverage industry,
particularly in the Cooper Street Employment precinct and Thomastown Industrial area. It is imperative that the State Government be proactive to strengthen and protect the employment land, as once rezoned, the land resource is lost.

In addition to the description outlined on page 64, the Cooper Street employment precinct is a major employment precinct within the municipality, and the northern region. With an anticipated 25,000 jobs, this precinct has developed into a vibrant precinct for sectors including food and beverage, health, education and the visitor economy.

It is understood that there is substantial employment land that surrounds the proposed Beveridge Interstate Freight Terminal (BIFT). Council requests clarity in the Plan on the status of this land, the opportunity for this land to come to market ahead of the delivery of the BIFT and the infrastructure requirements for this to occur.

Following the review of the Plan’s maps for the Northern Region, the following amendments are requested.

Map 8: Northern Region Future Directions Map – Industrial Land
The notes referring to each location below have been identified on Attachment 1. Annotated – MCLUP Map 8 Northern Region future direction map industrial land.

1. Deletion of land at Cooper Street and Cooper Street from being identified as State Industrial Land existing. This land is being rezoned from Industrial as part of Amendment C213. The Amendment has progressed through the panel and will be considered for adoption and approval in the near future. (Refer to Attachment 2 for C213 Zoning Map)

2. Deletion of land in Precincts 2 and 7 of the Framework Plan for Epping Central in Schedule 1 to the ACZ from being identified as State Industrial Land existing (refer to Attachment 3). The controls of ACZ1 for a mix of uses in these precincts.

3. Identify land at Cooper Street and O’Herns Road as State Industrial Land existing in accordance with Amendment C113 (gazetted). (Refer to Attachment 4 for C113 Zoning Map)

4. Identify Land in Precincts 3&4 in the Janefield DP as Local Industrial. (Refer to Attachment 5: Page 8 of Precinct 3&4 Concept Plan)

5. Identify land at Vearnings Road as State Industrial Land existing in accordance with Amendment C230. The Amendment has progressed through the panel and will be considered for adoption and approval in the near future. (Refer to Attachment 6 for C230 Zoning Map)
6. Deletion of land at McKimmies Road, Thomastown from being identified as State Industrial Land existing in accordance with the adopted Thomastown Industrial land Use Strategy (Refer to Attachment 7: Pages 26 and 27)

7. Inclusion of the future 'Wollert Rail Line' (refer to Attachment 8).

8. Inclusion of industrial land in the Shenstone Park Precinct Structure Plan. This should this be resolved prior to the finalisation of the plan.

9. Where appropriate, identify the opportunity for the expansion of State Significant Industrial Land within the Northern Quarries Investigation Area.

Map 9: Northern Region Future Directions Map – Commercial Land
The notes referring to each location below have been identified on Attachment 9. Annotated MICLUP Map 9 Northern Region future direction map commercial land

1. Identify land proposed to be zoned Special Use Zone at Cooper Street to Other Commercial Land. This land is being rezoned from Industrial as part of Amendment C213. The land use controls in the drafted SUZ schedule will allow for a range of land uses similar to the Commercial 1 Zone. The Amendment has progressed through the panel and will be considered for adoption and approval in the near future. (Refer to Attachment 2 for C213 Zoning Map).

2. Identify all land in Precinct 1 in draft Schedule 2 to the Activity Centre Zone in Amendment C204 as part of Major Activity Centre Existing (Refer to Attachments 10: ACZ2 in Amendment C204 and C204 Zoning Map). Amendment C204 has been adopted by Council.

3. Inclusion of the future ‘Wollert Rail Line’ (refer to Attachment 8).

4. Inclusion of commercial land in the Shenstone Park PSP should this be resolved prior to the finalisation of the plan.

Final notes
The review of The Plan, with opportunity to provide comment has been welcomed. The following points are the final comments worth noting;

- Inclusion of commentary on the future Wollert Rail ad the importance of this corridor in respect to the development and employment activities including the Epping Metropolitan Activity Centre, Aurora Town Centres and Wollert Major Activity Centre. The Wollert transport corridor is highlighted as one of Council’s advocacy priorities (Attachment 8). The City of Whittlesea is asking the State Government to secure the remaining land required to establish a train line from Lalor train station to the rapidly-growing communities of Epping North and Wollert. Currently there is no reliable public transport to these areas. A train line extension is essential within the next ten years as
the population is expected to rapidly grow from 34,531 in Epping North and 368 in Wollert in 2019, to approximately 94,868 people living in these areas by 2041.

- It is noted that the Plan makes reference to the South Morang Major Activity Centre. Council requests that this be amended to the *Plenty Valley (South Morang) Activity Centre* to be consistent with the Whittlesea Planning Scheme including the Planning Policy Framework Translation currently being led by DELWLP.

Thank you again for the opportunity to provide feedback. For further information regarding this submission, please contact [Contact Information].

Yours sincerely

Manager Strategic Planning and Economic Development
SCHEDULE 1 TO CLAUSE 37.08 ACTIVITY CENTRE ZONE

Shown on the planning scheme map as ACZ1.

EPPING CENTRAL METROPOLITAN ACTIVITY CENTRE

1.0

Epping Central Framework Plan

Plan 1 to the Schedule to Clause 37.08

Land use and development objectives to be achieved

- To significantly increase the density of new residential and commercial development.
- To strengthen links between key attractors, particularly along Cooper Street between Epping Station, Pacific Epping, and the High Street Village (sub-precinct 1A).
3.0 Precincts 3 and 4 of University Hill

As described within the Janefield Development Plan, Precincts 3 and 4 form a contemporary business park environment within University Hill.

Figure 2 shows the extent of Precincts 3 and 4 and the area of land that is subject to the provisions of this Concept Development Plan.

Precincts 3 and 4 comprise approximately 91,400 square metres of development area.
Fact Sheet 8 – McKimmies Road Precinct

Description: Located north of the Metropolitan Ring Road this is an isolated precinct within the wider industrial area boundary. Access is only available from McKimmies Road. A bus depot and the landfill operation rehabilitating the former quarry site are the predominate uses. The E6 road reservation connections through the eastern side of this precinct with residential to the west.

Role and function: This precinct is not expected to support industrial development in the long term given the availability of better located sites, including industrial land in the Epping corridor. The potential for ‘high-tech’ activities is also limited given the ability for businesses to access engineering professionals to the extent that other locations within Melbourne, particularly the south-east region are able to. The conversion of this industrial land to an alternative use would not represent a loss in terms of existing economic activity or employment based on the current use. Therefore, considering the broader context of the area, opportunities for alternative uses are recommended.

Opportunity areas: The precinct is largely underutilised and once rehabilitation works are completed a large proportion of this precinct may become available for development subject to geotechnical and contamination considerations. Appropriate detailed assessments of access arrangements, impacts of existing Dyson Depot, environmental implications (protected vegetation and species and flooding impacts) and any associated geotechnical and risk of potential contamination will be required when considering an alternative land use such as residential or mixed use. Any mixed use or residential development would also need to incorporate elements of social and affordable housing. The E6 corridor will remain protected as part of any future development scenarios.
Principles for development:

- The preferred approach for any redevelopment within this precinct is that a coordinated approach to the redevelopment, detailed master planning undertaken with key parties, including landowners, Council and key agencies to agree a set of guiding principles for development. Appropriate planning controls and tools can then be determined and implemented to facilitate the future use and development of the land.
OUR COMMUNITY URGENTLY NEEDS
A TRAIN LINE TO WOLLERT

Seeking four State Government commitments

- COMMITMENT 1
  Acquire the final 14 per cent of land required for the designated Wollert train corridor by undertaking and applying a public acquisition overlay.

- COMMITMENT 2
  Prioritise the Wollert public transport feasibility study, which is an action of the Victorian Infrastructure Plan (2017); with the inclusion of train capacity through Clifton Hill.

- COMMITMENT 3
  Bring forward the planning and analysis for Melbourne Metro 2, incorporating train capacity through Clifton Hill to coincide with the construction of Metro 1.

- COMMITMENT 4
  Provide a 10 minute premium bus service as the interim public transport service to Wollert, ensuring it does not delay development of a train service.

The City of Whittlesea is asking the State Government to secure the remaining land required to establish a train line from Lalor train station to the rapidly-growing communities of Epping North and Wollert. Currently there is no reliable public transport to these areas.

A train line extension is essential within the next ten years as the population is expected to rapidly grow from 34,531 in Epping North and 368 in Wollert in 2018, to approximately 94,868 people living in these areas by 2041.

Commitment one: Acquire the final 14 per cent of land required for the designated Wollert train corridor by undertaking and applying a public acquisition overlay.

We understand that Transport for Victoria (TfV) is endeavoring to purchase properties in the designated Wollert train corridor as they become available.

However, much of the outstanding land required is privately owned and spread over fragmented land parcels and this approach risks failing to purchase strategically critical land that is essential to secure the train line.

As development plans are being prepared for Wollert, it is recommended that TfV use Public Acquisition Overlay tools to secure the train corridor as soon as possible.

This approach will:
- Protect the corridor for public transport use
- Minimise acquisition costs as land will become more expensive to acquire as surrounding land is developed
- Provide certainty for current and prospective affected property owners. At present, property owners are unclear as to what is permissible and over what timeframe and compensation is not yet open to them even though there is effectively a restriction on their properties
- Allow for informed planning for related active travel Infrastructure such as footpaths, bike paths and open space

Map 2 (on page 4) shows the proposed train line extension and remaining land to be acquired.
Commitment three: Bring forward the planning and analysis for Metro 2, incorporating train capacity through Clifton Hill to coincide with the construction of Metro 1.

Bringing forward the planning and analysis for Metro 2 will address a range of issues as it will increase the capacity of the rail network by 20 per cent,2 and enable the development of the Wollert train line which is needed to cater for our growing communities.

- Limited access to public transport and the consequent traffic congestion and long commute times have a serious impact on the wellbeing of families and individuals.
- The Epping North community is burdened with significant traffic congestion and poor access to public transport, with many facing a two hour one-way commute to work.3 This oppressive commuting situation will become far worse once 65,0004 by 2020 new residents are established in Wollert and Epping North, most using the same route for their daily commute. Further, the City of Whittlesea experiences high rates of social exclusion and family violence that are exacerbated by the lack of train services and traffic congestion. Likewise the lack of public transport further increases already high living costs for mortgage stressed households.

- Access to public transport and traffic management are identified as two of the top three issues of community concern in the City of Whittlesea’s Annual Household Survey. Eighty-two per cent of Epping North residents reported that they sometimes or often have difficulty getting to places by car and public transport, respectively.4 At present, to access services and jobs residents must drive or use multiple bus services that are sparsely located and at times infrequent.

- A train line is essential to support the business growth and development expected from Epping being designated a Metropolitan Activity Centre. The train services are vital for the future development of Epping as a Metropolitan Activity Centre and regional hub. There are 33,000 jobs arising from the Cooper Street employment area and wholesale markets in this precinct.5 In addition a train line will support visitors and staff to access the Northern Hospital, which has the busiest emergency department in the state, treating nearly 88,000 patients annually6 and employing 3,000 people.7

Commitment four: Provide a 10 minute premium bus service as the interim public transport service to Wollert, ensuring it does not delay development of a train service.

There is currently a pressing need for improved public transport to the areas of Epping North and Wollert. Because population growth is outpacing the realistic provision of a train, increased public transport services are required in the interim. The current potential option of delivering a 10 minute premium bus service will provide a short term solution to the already established community of 40,000 people by 20208 but will not be sufficient for a growth area of approximately 100,000 people at the time development is complete.9 Provided there is no delay to the development of a complete train service, a rapid bus service could be established as an interim measure.

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1. Infrastructure Victoria’s 30 Year Infrastructure Strategy, February 2012.
5. The City of Whittlesea Integrated Transport Strategy, 2014, identifies that “the whole community benefits when residents are within an acceptable walking distance of public transport services” (page 52). Our figure of 37,000 reflects 20 per cent of the City of Whittlesea population at 2020.
7. City of Whittlesea, 2016 Annual Household Survey: 10.8 per cent of Epping North respondents to the City of Whittlesea 2016 Annual Household survey responded that they are more likely to spend 30 minutes or more travelling to/from work, compared to the City of Whittlesea average of 9.9 per cent.
8. City of Whittlesea, 2016 Annual Household Survey: 27 per cent (respondents) and 55.3 per cent (other report) have difficulty getting to places by car and public transport.
MAP 2: The proposed train line extension and remaining land to be acquired.

FOR MORE INFORMATION
Michele Purtle
Senior Advocacy Advisor

9217 2242
Michele.Purtle@whittlesea.vic.gov.au
whittlesea.vic.gov.au

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