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

There has been a submission on [Planning for Melbourne’s Industrial and Commercial Land](mailto: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.

No file specified

I am making this submission:
on behalf of a local council

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
30 January 2019

Planning Implementation
Department of Environment, Land, Water and Planning
PO Box 500
EAST MELBOURNE VIC 3002

Via email: planning.implementation@delwp.vic.gov.au

Dear Sir / Madam

Re: Submission to the Draft Melbourne Industrial and Commercial Land Use Plan

I write in relation the State Government’s recently released draft Melbourne Industrial and Commercial Land Use Plan (MICLUP) and would like to thank-you for the opportunity to provide feedback on the draft document.

I would like to commend the State Government on undertaking this work but do wish to raise a number of matters our Council believe warrant further consideration.

Consultation

As the DELWP will be aware the Department of Jobs, Precincts and Regions has for some time been running the Southern Economy and Planning Working Group. Kingston believes that this forum could have been used more constructively as an opportunity to actively ‘workshop’ the draft MICLUP prior to its formal release, particularly recognising the background work by MacroPlan Dimasi was finalised in December 2018. For such forums to be credible partnerships between the State and Local Government across Melbourne’s regions it is necessary for active workshopping to occur of such documents prior to release.

Council would now ask that prior to resolving the draft MICLUP, the DELWP and DJPR provide the Councils of Melbourne’s Southern Region with sufficient time to review the submissions received and collaborate on the optimal final form of the MICLUP as it relates to the Southern Region. Without such a process being formally established the credibility of the regional collaboration that is sought through the Economy and Planning Working Groups on this, and other strategic planning initiatives is directly undermined.

Commercial – Retail

The MICLUP identifies that approximately 911,100m² of retail floorspace will be required over the Southern region to meet demands anticipated through population growth by 2031. It is anticipated that almost half of this floorspace will be in the growth Councils of Casey and Cardinia whilst the balance will be in the remaining municipalities. Figure 29 of the draft MICLUP then provides a distribution of the anticipated floorspace (Office and Retail) by 2031 and approximately 150,000m² of additional retail floorspace would be required by this time in Kingston. Such a provision equates to a required GLFA which is well larger than the size of Westfield Southland over the next 11 years. This is forecast in the backdrop of assumed population growth of 1.2% pa and in an environment where ‘online’ retailing is now assumed to capture approximately 10% of all retail sales.
Kingston has concerns with the way this floorspace forecast may lead to unintended planning consequences associated with the potential for opportunistic ‘out of centre’ retailing proposals, given the loosening of controls through Planning Scheme Amendment VC123, regarding allowing activities including Shop and Supermarket in the Commercial 2 Zone.

Kingston has worked hard to proactively plan for the investment decisions of retailers to ensure projects are consistent with the objective of seeking to encourage retailing into identified locations. This is evidenced through:

a) The completion of Activity Centre Structure Plans for Moorabbin, Highett, Cheltenham, Mentone and Mordialloc.

b) A Structure Plan is currently underway for Chelsea and indicates that the amount of retail floorspace within the confines of the existing Commercial 1 Zone is likely oversupplied, based on the catchment dynamics and assumed population growth.

c) The facilitation of retail development in planned locations through Planning Scheme Amendments C42 (Aldi in Carrum), Amendment C75 (Woolworths Supermarket in Chelsea, Coles Supermarket in Patterson Lakes and the introduction of the Kingston Retail and Commercial Development Strategy), Amendment C81 (Thrift Park Shopping Centre redevelopment), Amendment C85 (Dingley Village Shopping Centre Redevelopment) and recently Amendment GC137 for Kaufland in Oakleigh South.

d) Significant Planning Permit Application activity to support other facilities including Homemaker Centres (Moorabbin, Mentone and Heatherton), the roll out of large format hardware stores (Heatherton, Mentone, Oakleigh South, Chelsea Heights), the roll out of Aldi Supermarket(s) (Carrum, Mordialloc, Southland, Moorabbin Airport) and the establishment and continued support for the expansion of Ritchies in Aspendale Gardens.

e) The facilitation of the Westfield Southland redevelopment.

The above illustrates the significant level of facilitation of retail activity in a municipality constrained by the Port Phillip Bay and South East Green Wedge and the municipality the draft MCLUP identifies as having the largest number of centres at 50 (refer page 90) in the southern region. Kingston also contains the highest number of ‘higher order’ Activity Centres and the Moorabbin Airport which now also performs a very significant large format retail employment role as identified in the draft MCLUP. When reviewing the designated Restricted Retailing Precincts at Clause 21.06 of the Kingston Planning Scheme, it is also clear that through changes in restricted retail tenancies and land uses an ‘undersupply’ in floorspace is not currently prevalent.

Council would request that the assumptions made regarding projected additional retail floorspace to 2031 are reviewed prior to the finalisation of the MCLUP to avoid significant ‘unintended consequences’ for small businesses and broader planning and transportation policies which are reliant on the established activity centre policy.

Commercial – Office

Kingston supports the work undertaken in the draft MCLUP to expand the provision of commercial (office) floorspace throughout middle Melbourne municipalities. Kingston believes that through the significant transport investment occurring and planned in its municipality it is well placed to capitalise on the opportunity to expand commercial office employment opportunities to meet population growth needs. Historically significant alignment existed between the traditional manufacturing workforce established in the municipalities that proceeded Kingston through the significant employment areas of Moorabbin and Clayton South though more recently changes in the municipalities demographics, have meant that the education and employment profile of the area has changed to now strongly support commercial office investment.
The development of the Parkview Estate in Heatherton and Chifley Business Park at Moorabbin Airport have provided substantial new office employment opportunities into Kingston and are critical components of building upon the opportunities to deliver a '20 Minute City'. What has been key to the success of these projects is ensuring that complementary support services including food and beverage, childcare and recreation have been accommodated into the precincts to attract and retain businesses.

The following projects are also representative of the newer office investment that is proposed in parts of the municipality:

- The redevelopment of the former manufacturing plant for Phillip Morris Factory at [blank] Chesterville Road, Moorabbin has provided for an adaptive reuse of the existing buildings to bring about uses which includes substantial new office tenants, on-site childcare, food and leisure-based tenancies and the CLIK Collective a Co-warehousing & Co working community built around emerging e-commerce based businesses.

- The site is worth visiting to view the reinvestment underway in the Moorabbin Industrial Area and more information can be found at [www.morrismoor.com](http://www.morrismoor.com)

- Immediately adjacent to the Morris Moor site is land recently purchased by Pellicano Property and Construction. A town planning application (KP-2019/569) has been recently submitted and provides for the innovative full redevelopment of the 3.14ha site over the next decade to create 32,000m² of office floorspace and provide for 3000+ jobs. At present the site contains approximately 60 jobs in what had been a traditional manufacturing business.

- The application reinforces the 'repositioning opportunities' being presented to obtain substantial efficiencies in the use of employment land that responds directly to local demographic changes. Further details can be obtained from Council.

- Council has also been working with the new owner of the existing office building at 1001 Nepean Highway, Moorabbin (prominent site in the Activity Centre Zone) which had pre-existing planning approvals for a significant residential redevelopment. The decision of the new owner to commence 'retrofitting' the existing sizeable office building rather than pursue a residential proposal represents an outcome that has not occurred across similar activity centre sites over recent years.

As the above projects demonstrate the level of planned 'office' investment as envisaged in the draft MICLUP, is well underway and unlike the forecasts for substantive additional 'retail uses' would appear to reflect an identified need in the local catchment.

**Strategic Sites**

**Clayton Business Park**

Council has been collaborating with the Victorian Planning Authority (VPA) as the project manager and Goodman Australia as the site owner on a process of considering the potential redevelopment of this site to a commercial mixed-use precinct for approximately four years. The mixed-use nature of the project is very similar to other projects the Victorian Government and the VPA have or are currently pursuing as part of a number of identified significant urban renewal opportunities in Melbourne that are critical to managing the diversified needs of Melbourne’s growing resident and worker population. Such precincts include, Fisherman’s Bend, Altona North, Arden and more locally East Village (Glen Eira) and the PMP Printing Site (Monash). Council wishes to reinforce that the intention of the planning work for Clayton Business Park is to achieve a genuine 'mix of uses' at higher densities on what is a presently heavily underutilised and largely purpose-built site for car assembly.
On 27 June 2016, Council resolved to “respond to the correspondence from the Metropolitan Planning Authority providing its agreement to work with Goodman Australia and the Metropolitan Planning Authority to undertake the required strategic planning to inform a possible future Planning Scheme Amendment request to Council regarding the Clayton Business Park.” The correspondence referred to in the resolution relates to a letter from the then Metropolitan Planning Authority (MPA) seeking agreement to establish a project control group for the project, with the then MPA as process facilitator. Council has assumed since this time, that the now VPA has been provided periodic updates to the DELWP and Planning Minister on the significant planning work being conducted for this site.

Council notes that the draft MCLUP report designates the Clayton Business Park site as ‘Regionally Significant Industrial Land’ (p95). In describing the role of ‘Regionally Significant Industrial Land’ in the southern region the report indicates that planning should (p94):

“Retain regionally significant industrial precincts as identified on the future directions map for the region and protect them from encroachment from sensitive uses that may compromise development and efficient operation of businesses in these locations.”

Recognising the above the following reference is made on Page 86 of the report in relation the Victorian Planning Authority’s role in the process:

“The Victorian Planning Authority has been directed to undertake a planning project specific to the Clayton Business Park. Resolution of future land uses for this site will be determined through this project which is currently underway”.

Mindful the intent to undertake a Planning Scheme Amendment in the new year, Council is very concerned that after more than 4 years of working in the Monash NEIC with the VPA, the draft MCLUP does not directly reinforce the strategic intentions for this site to create a mixed-use precinct. It is particularly concerning given how sites such as the East Village in East Bentleigh are described on Page 100 given the similar approach being taken by the VPA to that which is occurring on the Clayton Business Park.

When reviewing the significant challenges in accommodating employment and population growth in strategically well-located places, it is important that the following matters are holistically considered:

- The site provides for the integration of a High Tech Industrial precinct along the sites Centre Road frontage of the site providing for an estimated 51,000sqm of floorspace. This area provides for a buffer exceeding 200 metres from the sites Centre Road southern frontage and provides for a comparable design and land use response to the Bosch Facility which is on the other side of Centre Road.

- Despite no history of significant complaints from established residential / mixed use areas, a detailed assessment has been undertaken to establish appropriate buffers for sensitive uses to existing industrial operations. The level of assessment that has been undertaken is rigorous and unlikely to have occurred in many other ‘renewal locations’ (including M City) and has resulted in substantive changes to the way the site has been planned and the significance of the ‘buffers’ now imposed.

- It is also appropriate to consider the planning implications on maintaining and intensifying the sites sole purpose for Industrial uses, given the immediate relationship to largely ‘greyfield’ residents areas, that Council’s draft Housing Strategy has rightly identified could (and are) being used for more intensive forms of accommodation.

- Substantial mixed-use precincts are identified on the site providing for a large range of commercial 104,000 sqm and retail uses of approximately 19,000sqm. The draft MCLUP identifies on page 91 the role rezoning will play in accommodating future floorspace requirements.
• A large range of community benefits would be derived from the proposal including and not limited to:
  o Opening up the site to provide a more integrated response to surrounding areas to access public transport through Westall Station.
  o A significant commitment to growing the supply of affordable housing at a scale not previously seen in the City of Kingston given the scale of envisaged new population.
  o A new community facility to service the existing and new community’s diverse needs.
  o New public open space areas including the expansion of the First Avenue Reserve.
  o Contributions towards upgrading existing sport and recreation infrastructure within the immediate area to the benefit of the new and broader community.

• Providing for up to 5,800 dwellings immediately adjacent to Westall Station with immediate access to:
  o The significant range of employment / education and health opportunities in the Monash NEIC;
  o A potential for direct integration from Westall to Clayton Station (1 Stop 2 mins travel time) and then directly connecting commuters with the planned Suburban Rail Loop.
  o Reverse employment commute opportunities on the Cranbourne line that are critical to managing the train network through rapid population growth as follows:
    ▪ Springvale 1 Stops – 2 mins
    ▪ Sandown Park 2 Stops – 4 mins
    ▪ Central Dandenong 5 Stops – 12 mins
    ▪ Cranbourne Station 8 Stops - 25 mins

• It is now demonstrated through a range of other Commercial (Mixed Use) projects being advanced in Kingston that the end employment densities on the site are likely to be substantially higher than what is currently achieved. This is important to recognise given the very different role the Monash NEIC plays when compared to ‘warehousing’ and ‘logistics’ based industrial areas in Melbourne.

Given the strategic significance of the site, it is necessary that Plan Melbourne is viewed holistically when interpreting the appropriate land use response. Many Policies contained within Plan Melbourne reinforce the need to capitalise on ensuring a broader range of opportunities are presented on the land.

• Policy 1.1.3 – Facilitate the development of national employment and innovation clusters
  Recognition exists within Plan Melbourne that the Monash NEIC will be a genuine mixed-use cluster and will contain residential development. Substantial work has been undertaken since the inception of the planning work for the site to create defined mixed use and targeted employment precincts across the CBP site.

• Policy 1.3.1 – Plan for and facilitate the development of urban renewal precincts.

Plan Melbourne states: A number of former industrial and other sites – around Melbourne are currently underutilised. Local planning authorities should identify and plan for ways these sites can be repurposed to create jobs and accommodate growth.

• Policy 1.3.2 – Plan for new development and investment opportunities on the existing and planned transport network.

• Policy 2.1.1 – Maintain a permanent urban growth boundary around Melbourne to create a more consolidated sustainable city
• Policy 2.1.2 – Facilitate an increased percentage of new housing in established areas to create a city of 20-minute neighbourhoods close to existing services, jobs and public transport.

Notably for Kingston the VIF 2016 figure quoted in Plan Melbourne is approximately 15,000 people less than the VIC 2019 population forecast to 2036. This reinforces the importance of mixed use opportunities such as CBP to assist Council in the delivery of its Housing Strategy.

• Policy 2.2.2 – Direct new housing and mixed-use developments to urban renewal precincts and sites across Melbourne.

• Policy 2.2.3 – Support new housing in activity centres and other places that offer good access to jobs, services and public transport.

The sites relationship to Westall Station providing immediate access to the future suburban rail loop and reverse commute opportunities are critical important in ensuring the effectiveness of the train network as Melbourne’s population grows.

• Policy 2.3.4 – Create ways to capture and share value uplift from rezonings.

Kingston has commissioned work at CBP to examine opportunities to increase the supply of social and affordable housing and the subject site presents as the largest opportunity within the municipality to achieve a positive and important planning outcome.

• Policy 5.1.1 – Create mixed-use neighbourhoods at varying densities.

• Policy 5.2.1 – Improve neighbourhoods to enable walking and cycling as part of daily life.

Significant urban design work has been undertaken at CBP by seeking to open up the site and provide enhanced connectivity through and beyond to neighbouring residential and employment areas.

• Policy 6.3.2 – Improve alignment between urban water management and planning by adapting an integrated water management approach.

The proposal includes opportunities to creatively address localised flooding issues in Rayhurst Street.

• Policy 6.4.1 – Support a cooler Melbourne by greening urban areas, buildings, transport corridors and open spaces to create an urban forest.

The existing conditions on CBP have recently been identified through Kingston’s draft Urban Cooling Strategy as one of the most significant urban heat islands in the municipality. The planning process provides a direct opportunity to address this and substantially enhance the amenity of the precinct.

Noting the significant time and resources already expended working with the VPA and the landowner on this project, Council seeks a prompt resolution of this matter to then allow an Amendment to be considered to complete the repositioning of this site.

Southern Road, Mentone

Council is in receipt of the recent correspondence from the Planning Minister dated 8 December 2019. The land in question is identified in the Kingston Planning Scheme as ‘Medium – long term redevelopment for housing and/or mixed uses’ as part of the Industrial Framework Plan. Council and the community living immediately south of the small precinct of Industrial zoned land has for some years been more concerned with the amenity implications from the ‘land locked’ industrial land than any tangible impact from the Moorabbin Airport. This has been reinforced both in reviewing complaints history with the Moorabbin Airport and through analysis at two previous Planning Panel hearings.
Council hold the view that the genuine ‘safeguarding’ concerns in Southern Road are in fact less, than those of new building incursions proximate to the runway approaches, something Council has raised in previous submissions.

Council will be working with the MAC on its next version of its Master Plan and an ultimate ANEF for Moorabbin Airport. It does consider that this work is critical in properly informing future land-use decision making for the Southern Road, Mentone precinct.

Council notes that this land has also been designated as Regionally Significant Industrial Land. Council would like this designation reviewed as part of the MICLUP given the land in Southern Road, Mentone is landlocked and would make any future ‘re zoning’, even to a Commercial 2 or 3 Zone substantially more difficult in the future if this designation remains.

**Current and future Kingston Industrial and Commercial Strategies**

It is noted that some of the designations of land within MICLUP are inconsistent with policies contained within the Kingston Planning Scheme including the Kingston Industrial Land Strategy (1997) and the Retail/Commercial Development Strategy, City of Kingston, prepared by Charter Keck Cramer and Hansen Partnership (2006) as well as the Industrial Framework Plan in clause 21 of the Kingston Planning Scheme.

Of note, the Framework Plan in Clause 21 includes designation of some RSIL identified land as being potentially suitable for housing and/or mixed uses which have not yet transitioned, specifically the aforementioned Southern Road site as well as land in close proximity to the Mordialloc Activity Centre (specifically the Lamana Road industrial precinct). This results in State draft policy position being inconsistent with designations in the Kingston Planning Scheme, which may lead to confusion and misinterpretation. Council requests that prior to resolving upon the MICLUP a consistency is established whereby the very few sites already identified in the Kingston Planning Scheme at Clause 21.08 are included as ‘Local Industrial Land’ rather than ‘Regionally Significant Industrial Land – Existing’.

Council will be commencing background work in 2020 on an Employment Land Strategy which will build on the outcomes sought by MICLUP. Council is keen to collaborate with DELWP on the Kingston Employment Land Strategy, noting that strategic in-depth assessment of land may require a review of some of the designations contained within MICLUP.

**General Comments**

Council notes the community dividend that can be achieved through the considered repositioning of strategic sites such as Clayton Business Park and Southern Road and the opportunity this presents for value uplift to fulfil a broader net community benefit. Council is currently progressing development of its Social and Affordable Housing Policy which will identify the quantum and type of social and affordable housing required in instances such as these and the importance of inclusionary zoning as a tool to deliver such outcomes.

We note that the designation of part of Kingston in Map 12 as “Extractive Industries Work Authorities – Approved” is incorrect and should be removed as these activities have long ceased in Kingston. Council also seeks clarification of the location of the Westall Quarry Terminal designation on the map as this appears to extend into Kingston Council boundaries. To this end, it is also noted that page 86 of Part A also refers to the Green Wedge area of Kingston including some quarries and landfill sites. These activities have now long ceased and are making way for the Sandbelt Chain of Parks as identified in Plan Melbourne (refer Map 21). It is noted that the Monash NEIC extends into Kingston however this is not reflected on the southern region maps 12 and 13, nor mentioned on page 86, nor mentioned in detail within MICLUP with respect to Kingston.

Overall, Kingston has varied industrial precincts ranging from traditional industrial to high tech, as well as new developments including the Morris Moor site. Council extends an offer to the relevant DELWP officers for a tour of the Kingston industrial land. This may assist in discussing different designations of land and provide a different perspective to the challenges and opportunities that exist within our city.
Should you have any queries regarding this submission, please contact [redacted].

Yours sincerely

[redacted]

MAYOR