

Planning Implementation (DELWP)

From: contact@engage.vic.gov.au
Sent: Friday, 20 December 2019 9:22 AM
To: Planning Implementation (DELWP)
Subject: New Form submission on Planning for Melbourne's Industrial and Commercial Land



New Form submission on Planning for Melbourne's Industrial and Commercial Land

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?

No

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

Tract Consultants has prepared this submission and acts on behalf of BWP Trust.

BWP Trust is a real estate investment trust investing in and managing commercial properties across Australia. The majority of the Trust's properties are large format retailing properties. This submission has been made in respect to all BWP Trust land holdings within metropolitan Melbourne, with a particular focus on the following sites:

- ♣ 'The Coburg Site' – 64-74 Gaffney Street Coburg (identified as Regionally Significant).
- ♣ 'The Preston Site' – 120 Chifley Drive, Preston (identified as Regionally Significant).
- ♣ 'The Scoresby Site' – 1467 Ferntree Gully Road, Scoresby (identified as Regionally Significant).
- ♣ 'The Nunawading Site' – 250 Whitehorse Road, Nunawading (identified as Regionally Significant).

In general, the principles and strategies identified within the Plan are welcome. We would however note that long term growth predictions are subject to change and as such the ongoing monitoring of the business climate, changing nature of industrial and commercial land uses, trends and need will be critical to the success of the Plan. Whilst strategically allocating land to industrial and commercial uses in the long term would give landholders some clarity and certainty over property assets, landholders also require flexibility to appropriately change land use outcomes if alternative city-shaping options become favourable.

We specifically note that Principal 3 Strategy 3 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.'

We would respectfully submit the particular singling out of 'Locally Significant' land to be inappropriate as it does not include the necessary flexibility in strategic planning for land which has been broadly categorised as 'Regionally Significant'. For example, The Preston Site (120 Chifley Drive, Preston) has long been identified as a metropolitan renewal opportunity, as

reflected in Plan Melbourne 2017-2050 (Major Activity Centre) as well as the evolving Northland Urban Renewal Precinct (NURP) strategic work undertaken by Darebin City Council. The Planning for Melbourne's Industrial and Commercial Land identifies this entire precinct as 'Regionally Significant' therefore undermining the strategic work and justification already undertaken and agreed at the local scale.

Given this, we would strongly suggest the revision of Principal 3 Strategy 3 to also include 'Regionally Significant' land. This would not provide strategic support for potential mixed-use or residential outcomes, rather enable the contemplation of such changes which would require dedicated strategic analysis.

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?

No

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

It is recognised that clustering and agglomeration processes have the ability to increase efficiency for businesses. However, the concentration of interlinked industries can have detrimental effects on an area if those areas are supporting declining industries. Industrial areas must be resilient and have the built-in flexibility to change land uses, and if necessary, zoning changes, to avoid underutilised areas throughout uncertain economic cycles.

We welcome the Plan's assertion that 'Regionally Significant' industrial precincts generally have high and ongoing economic output. Notwithstanding this, there is a clear misalignment between Policy Alignment item 3 and local strategic planning efforts. For example, the ongoing NURP strategic work undertaken by Darebin City Council. Specifically, Policy Alignment item 3 states:

'The area has been identified in council strategies as being a core or primary industrial area that should be retained, or that provides for significant employment opportunities by virtue of the size of the area.'

In the instance of NURP the identification of this location is not aligned with this item. The Darebin Economic Land Use Strategy (prepared by Spade) was adopted by Darebin City Council in 2014. The strategy thoroughly details all industrial land within the municipality and states:

'In the case of the East Preston Core Industrial Area, recognise the redevelopment potential of the area bounded by Gower Street, Chifley Drive, Bell Street and Albert Street by rezoning this sub-precinct to the Comprehensive Development Zone. Detailed planning will be required to promote the sub-precinct as a mixed use (primarily commercial and residential) urban renewal opportunity of state significance.'

As outlined in the principles and strategies response (above), there isn't the flexibility for sites identified as 'Regionally Significant' to progress potential mixed-use or residential opportunities.

Similarly, The Nunawading Site (250 Whitehorse Road, Nunawading) is located within the Whitehorse City Council 'MegaMile West Activity Centre'. The local planning policy within the Whitehorse Planning Scheme states:

'The MegaMile (west) AC will accommodate a broader range of uses including commercial activities and a consolidated residential area along the north side of Whitehorse Road in Blackburn'.

As above, given the 'Regionally Significant' terminology used in identifying this Site, there is a mismatch between existing local planning policy and strategic background, and the overarching intent of Policy Alignment item 3. The Nunawading Site is strategically located in proximity to Nunawading train station and the smart bus service along Springvale Road and as such should not be unreasonably excluded from future mixed use opportunities.

Given this, we would request further investigation and clarification between all existing strategic work being undertaken at the Council level, against the Regionally Significant industrial precinct criteria.

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?

No

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

We acknowledge the role and function, and in this instance, the purpose of the State-Significant industrial precincts, however the limited land use outcomes perceived in the Regionally and Locally Significant purpose do not allow adequate flexibility. Many Regionally and Locally Significant industrial areas are identified in Plan Melbourne 2017-2050 as Major Activity Centres, which seeks to diversify land use and development opportunities and outcomes in these

locations. To minimise the opportunity for genuine mixed-use opportunities in these locations, would in our view, contradict the widely accepted intent of densifying and diversifying metropolitan Melbourne.

Further, the Plan states regionally significant industrial land will predominantly be zoned either Industrial 1 Zone or Industrial 3 Zone. In both zones the land use for 'office' is not as of right (Section 1 Use). This appears to be in contradiction with the purpose of Regionally and Locally Significant industrial precinct's ability 'to provide opportunities for industry and business to grow and innovate in appropriate locations for a range of industrial uses that can contribute significantly to regional and local economies'.

There may be instances, for example The Scoresby Site (1467 Ferntree Gully Road, Scoresby), which is isolated on the northern side of Ferntree Gully Road and currently zoned C2Z, and importantly abutting a large public open space – to be considered for a genuine mixed-use outcome including residential land uses. The purpose of the 'Regionally Significant' industrial precincts as is currently proposed does not allow such potential land use option to be explored.

We would lastly note, the Commercial 3 Zone (as noted as a possible zone typically applied to Regionally and Locally Significant land) is yet to be utilised within the Victorian Planning System. This planning control was introduced into the VPPs in 2018.

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?

The articulation of clear guidelines for Council to undertake local industrial land use strategies is welcome.

Notwithstanding this, there is little flexibility in the specific identification of 'Regionally Significant' land and its ability to be considered for any land uses other than strictly industrial or pure commercial outcomes.

As noted above, we see this as an oversight and important element in which the finalisation of this documentation and drafting of planning policy should take into consideration.

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?

No

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

In general, the areas have been adequately identified and described with the land uses and dominant industries that are in situ at the present time. Trends and opportunities must be considered and monitored going forward to avoid typecasting the precincts into inflexible land uses. It is noted that the Plan outlines significant population growth within all six metropolitan areas. It is submitted that a diverse range of jobs and services will be required to service the ever growing population. Therefore, flexibility in the zoning of land to allow for office, residential

as well as industrial sites will be key to support a vibrant Melbourne economy into 2030 and beyond.

In addition, there is potential for the sites listed above and the industrial precincts in general being affected by new State infrastructure (for example the proposed Regional Rail Loop) which would critically alter the premise of the designated industrial precincts and reconsideration of the Plan would be necessary.

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

We welcome the opportunity to provide feedback on the draft Planning for Melbourne's Industrial and Commercial Land and look forward to ongoing consultation as this work progresses into its final documentation.

If you would like to upload a submission, please do so here.

No file specified

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:

<https://engage.vic.gov.au/index.php/dashboard/reports/forms/viewDetail/2373>

Regards,

The Engage Victoria Team

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