
Request to be heard?: Yes

Precinct: Sandridge

Full Name: Ashley Edwards

Organisation: Toyota Motor Corporation Australia Limited

Affected property:

Attachment 1: LETTER_DELWP_R

Attachment 2:

Attachment 3:

Comments: Please refer to attached pdf file "LETTER DELWP RE FISHERMANS BEND DRAFT FRAMEWORK 151217"



TOYOTA MOTOR CORPORATION AUSTRALIA LIMITED

A.C.N. 009 686 097 A.B.N. 64 009 686 097

15 December 2017

Fishermans Bend Taskforce
Level 36/2 Lonsdale St
Melbourne VIC 3000

BY POST AND ONLINE fishermansbend@delwp.vic.gov.au

To whom it may concern,

RE: SUBMISSION - FISHERMANS BEND DRAFT FRAMEWORK

Toyota Motor Corporation Australia Limited (Toyota) has three sites located within the Fisherman's Bend Urban Renewal area, located at 61, 140 and 155 Bertie Street, Port Melbourne. 140 and 155 Bertie Street forms part of Toyota Australia's national corporate headquarters (CHQ), with the technical, design and regional office functions being performed from the 61 Bertie St premises, which includes a significant building fronting Fennell St.

Subsequent to the decision and announcement that Toyota's local manufacturing operations would cease, which has now taken effect, Toyota undertook an extensive review of its national operations and decided to consolidate functions in Melbourne. This decision involved closing down significant operations in NSW and transferring them to Melbourne. To support this business consolidation, Toyota invested heavily in upgrading its CHQ premises in Port Melbourne. Toyota's significant landholdings at Altona will also be developed over time to suit remaining business operations.

The commitment Toyota has made to remain and enhance operations and corporate presence in Port Melbourne, be an employer of choice, and sustain a significant workforce (which exceeds 500 staff in the CHQ premises alone) makes Toyota keenly interested in the plans for Fishermans Bend including the draft framework.

Toyota has taken preliminary planning advice and acknowledges the intentions associated with the introduction of the draft framework, including how it may assist in furthering State and Local planning objectives.

The three Toyota sites stated earlier are contained within the draft Fisherman's Bend framework area and will be affected by the proposed controls. Key aspects considered thus far in reviewing the proposed controls have been the implications associated with:

- the operation of Toyota's recently refurbished CHQ premises, and any future development at that site to meet future needs;

- the future use and potential of Toyota's land at 61 Bertie Street and influence on future retention, use or disposal of this site.

With significant landholdings in the area affected, and in response to the initial review of the proposed framework and the draft planning controls, Toyota is of the view that adjustments should be considered to optimise the full potential of sites within the area, and not impede existing uses that are required to remain. We further note the opportunity for more clearly defined parameters to be discussed regarding the acquisition of roads and open space, development contributions, built form requirements, development plan overlay requirements, plot ratio controls and amendments to the parking overlay. Brief commentary of Toyota's concerns and observations follow.

Acquisition of roads and open space and Development Contributions

Toyota is concerned with the lack of clarity regarding when and how roads and open space will be acquired and how this will affect the ongoing operation, and potential future adjustments or adaptation of its sites. There is a proposed road effectively bisecting the CHQ site, and open space has been located in the north-east corner of 61 Bertie Street. The controls don't appear to allow for discretion for future refinements or expansion to buildings and works in these areas, even in situations where such works may enhance the existing uses, to the benefit of the precinct. The proposed controls are drafted in a way that requires the provision of the road and open space as part of any application affecting that land.

Additionally, a Development Contributions Plan has not been prepared under the Development Contributions Plan Overlay and therefore there is lack of clarity relating to how much will be payable and whether credits will be provided for open space and roads.

Design and Development Overlay built form requirements

Toyota has concerns relating to the lack of discretion to vary the built form requirements. Given the significant investment Toyota has made at the CHQ site, Toyota's current plans contemplate a long term occupation at this site, and as such require the certainty to further enhance its headquarters in a manner that suits future needs. Given the location of a proposed future road alignment through Toyota's existing CHQ building, there are concerns that any additional works may be prohibited based on the wording of the revised DDO, which allows for minimal discretion to apply for a permit to vary the built form requirements.

Development Plan Overlay requirements

The 61 Bertie Street site is proposed to be covered by a Development Plan Overlay. A permit cannot be granted on the land if a Development Plan has not been prepared in accordance with the requirements of the Development Plan Overlay. The Development Plan for the Sandridge Precinct requires to resolve opportunities for transport interchange and investigate options for access to a

future metro station to be integrated into development. Given there is minimal information regarding the future metro station and delivery timeframes, Toyota is concerned that a permit cannot be granted to allow for buildings and works to the existing use prior to a development plan being prepared which makes accommodating future ongoing operations difficult. There is also a lack of clarity as to how a Development Plan for this sub-precinct area can be progressed at this stage, which makes it extremely difficult to undertake any long term planning for the site.

Introduction of plot ratio controls

The introduction of plot ratio controls appears to contradict the increased height controls. The height controls have increased for each of Toyota's sites, however the introduction of plot ratio controls and the additional built form requirements do not allow for the increased heights to be achieved. Given the Fisherman's Bend area is more than twice the size of the current CBD and is Australia's largest urban renewal site, it is unclear why there are residential and job caps, and the introduction of plot ratio controls which are significantly less than the 18:1 plot ratio permitted in comparable general development areas of the Capital City zone applying to the CBD. Toyota is of the opinion that adjustments and refinements should be considered to optimise the potential of the area.

Parking Overlay (Schedule 1) requirements

Toyota has strong reservations regarding the revisions to Schedule 1 of the Parking Overlay, which include limiting the opportunity to apply for a permit to provide car parking spaces in excess of the parking rates specified in Table 1 of the proposed schedule (1 to each 100sqm of gross floor area for office). The revised schedule outlines that a permit can only be granted to provide more than the maximum parking provisions, where alternative parking, as set out in various clauses, forms part of an approved car parking plan. It would be extremely difficult for individual businesses within the precinct to effectively prepare a car parking plan, and how it can realistically capture the interim requirements of businesses in the area. Toyota's staff rely heavily on onsite parking provisions, given the lack of public transport within the vicinity of the site. With no timeframes provided for the delivery of the additional tram and metro lines, the Parking Overlay should continue to allow discretion to provide additional parking in the interim until public transport is delivered without a precinct car parking plan having been prepared.

A car parking dispensation that allowed additional car parking at the CHQ site at 155 Bertie Street was a fundamental element in enabling Toyota to consolidate its operations at Port Melbourne. It is critical that the proposed new controls provide an appropriate level of discretion to enable such circumstances to be taken into account in order to facilitate ongoing successful business operations.

Toyota greatly appreciates the opportunity to participate in the public consultation process and, together with its advisors, looks forward to working closely with the Department of Environment, Land, Water and Planning, and the Fishermans Bend Taskforce. Given the extent of initial observations, and the certain need for adjustments and additional clarity, to ensure the Fishermans Bend redevelopment

is optimised and supports ongoing business operations, Toyota requests the opportunity to be heard at the forthcoming panel hearing, and to be kept informed of the next stages. This submission is preliminary in nature and not exhaustive, and Toyota may therefore seek to vary or expand on the submission during the hearing process.

If you have any questions please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ashley Edwards', with a stylized flourish at the end.

ASHLEY EDWARDS
Manager Corporate Property
Corporate Affairs Division

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cc: Cameron Cormack (Divisional Manager, Corporate Services, Toyota Australia)
Julie Atwell (Corporate Manager, General Affairs, Toyota Australia)
Jonathan Lathleiff (Corporate Manager, Strategy & Planning, Toyota Australia)