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Our Ref: AR:SS:210281

28 November 2025

The Victorian Planning Authority
Greater Avalon Employment Precinct
G.P.O Box 2392
Melbourne 3001
[REDACTED]

By Email: GAEP@transport.vic.gov.au

Dear Sir/Madam,

**Re: Greater Geelong Planning Scheme
Amendment C477ggee**

Thank you for forwarding to me a copy of the Booklets regarding the Public Consultation on Draft **Amendment C477ggee** to the Greater Geelong Planning Scheme.

We advise that [REDACTED] are the appointed Legal Representatives of the late [REDACTED].

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

Please note that since 2006/2007 [REDACTED] was the sole Registered Title Proprietor of the property known as 210 Avalon Road, Avalon.

This land is currently designated as farmland.

It contains a total area of approximately 350 acres or 141.64 hectares and includes former allotments facing Winstanley Road, Avalon.

For legal purposes, the property is held and registered in the names of the two Trustees for the Estate of the late [REDACTED] who died on [REDACTED].

On behalf of the Estate, we wish to provide the information contained herein as a Submission to the Department of Transport and Planning about the **Amendment C477ggee** to the Greater Geelong Planning Scheme.

First, we acknowledge that the land held by our clients on behalf of the late [REDACTED] is presently outside of the existing identified geographic areas of the Greater Avalon **Employment Precinct**.

However, this land is significant in the consideration of the GAEP both now and in the future.

Although the GAEP is identified as a key strategic employment area in Plan for Victoria on the “Geelong in the Future” map, you cannot develop a strategic **Employment Precinct** without taking into account where those future employees may live, where they socialise how they get their places of employment, what infrastructure exists or can be built to enable the employment precinct to fit in with Victorian Planning Scheme objectives of having people being able to access so many of their lifestyle activities including employment, shopping, schools, transport, housing and accommodation within 20 minutes.

The land held at 210 Avalon Road, Avalon is located on the opposite side of Avalon Road from the Avalon Dandos Roads intersection going North towards Princes Highway some kilometres.

It is the only remaining single owner large land allotment in this Western Precinct between Avalon Road and the Hovell’s Creek.

If the strategic plan envisages a workforce of 8,000 jobs, then that will affect at least 8,000 families, which with just two adults and only one child adds at most 20,000 people who may be in this area of the GAEP at different times.

But with even only a much smaller number just for employees which the Plan assumes will come from various surrounding areas, like Lara, Werribee, Geelong and its suburbs and without any fixed Public Transport yet, and either the Road Public Transport, i.e. buses and private transport of motor vehicles, there will be major saturation of roadways and bridges arterial roads and local roads with the obvious enormous costs for the infrastructure needed.

An obvious ameliorating way to reduce these costs factors and also achieve other Planning outcomes would be to consider re-zoning the land along the Western boundary of Avalon Road to residential zoning and not even rural living zoning.

Some of this land may already allow for rural living zoning but as stated the only large single owner land allotment is the property at 210 Avalon Road, Avalon.

We therefore request that the Committees looking at the GAEP, extend their vision beyond the issue of creating just an **Employment Precinct**, which would become just like a funnel to bring 8,000 people from distances away into this area which will require such enormous infrastructure, incur enormous costs, whereas re-zoning the land in question (and other allotments) and creating a new residential zone on the West of Avalon Road, which just on [REDACTED] land (as we call it) could allow for maybe between 600 and 1,000 separate residential units with so many places for future employees to be within walking distance for many employment sites on the Eastern boundary side of Avalon Road even further in.

Many employees could bicycle to the Airport Precinct for work and there could be shorter Public Transport services (buses) for shorter distances.

Re-zoning [REDACTED] land which abuts Hovell's Creek which could be used as an infill residential development, can still allow for and create suitable conservation protection areas. Can be used to protect Environmentally significant characteristics.

We suggest that such a zoning as residential not only achieves a nearby workforce for the GAEP, but it also helps and can reduce transport movement networks, helps staging of these steps and infrastructure and costs obviously. This helps to develop better integrated transport management. This helps to develop better water, power and conservation management and can assist in creating more arboriculture and biodiversity precincts.

This addition to the re-zoning results in a higher level of amenity for workers visitors and the whole community.

Now is the time to incorporate this rezoning into the GAEP. To help guide the extended built forms and even the subdivision outcomes and placement of different styles, shapes, heights and nature of the built form for the GAEP especially near to and within sight of the proposed residential re-zoned land areas.

This step not only adds significant benefit to the total concept development, it facilitates commercial, industrial and infrastructure development.

In no way does it negatively impact the Avalon Airport development.

It helps to create an integrated development in the total area and provide an orderly, economic use of the area.

This would help attract local, interstate and even overseas interest in the area, adding significantly to the benefit and value of the developments and the strategic plan itself.

It should incorporate the construction and extension of the Dandos Road roadway beyond Avalon Road to the West and allow for a possible connection across the Waterway of Hovell's Creek into Geelong in the future time.

Not only does this provide a very nearby local workforce, it adds to securing a pleasant, efficient, safe working living and recreational environment in the surrounding areas adjoining but immediately outside of the actual GAEP.

Again, obviously as a new urban residential development, it can anticipate future needs for infrastructure services e.g. water, power, gas, sewers, etc.

It also takes away some of the pressure being exerted for the extension of the residential community development especially to the West of the Greater Geelong Area.

Also, it belongs to part of an infill development.

In summary, the incorporation and re-zoning of this land creating the Western residential boundary of Avalon Road, Avalon clearly fits in with **Amendments C477ggee** and clearly compliments the **Amendment** proposed and it helps the **Amendment** facilitating the orderly planning and delivery of an integrated **Employment Precinct** where workers live and work.

It provides for workers nearby accommodation to their employment, giving many easy accesses to jobs, services, infrastructure for recreational, community, accommodation and importantly it can be achieved in a way that it may well save millions of dollars in both the short term and long term in infrastructure costs for services being roads, bridges, essential

services e.g. power, gas, water, sewage and of course in transport services e.g. rail and road, with shorter trips for many workers whether by private vehicle or public services e.g. buses.

Finally, we recommend these matters be taken into account because although the **Amendment** and the area in question GAEP is focused on an **Employment Precinct**, you cannot have an **Employment Precinct** without a workforce, and you cannot not take advantage of an adjoining of opportunity to accommodate some of that workforce on the doorstep or as near as practicable to your **Employment Precinct** with housing.

It is somewhat surprising that in the listing of the relevant agencies with whom consultation occurred for a preparation of the **Amendment C477ggee** and the Explanatory Report, that the relevant Department of Housing and other Housing Authorities appear not to have been contacted and consulted.

Please contact [REDACTED], should you wish to discuss this matter further.

[REDACTED]

Yours faithfully,

ANTHONY RASO & ASSOCIATES