

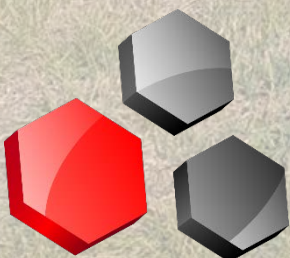
Submission to:

Draft Amendment C477ggee – Greater Avalon Employment Precinct

On behalf of:

Avalon 2020 / Avalon City / Avalon Lodge

December 2025



Dominion Property Group



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Disclaimer:

This report has been prepared at the request of:

- Avalon 2020: 65 Beach Road and 130 Pousties Road, Avalon;
- Avalon Lodge: 80 Pousties Road, Avalon; and
- Avalon City: 5 Beach Road, Avalon.

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Any recommendations, opinions or findings stated in this report are based on circumstances and facts as they existed at the time DPG performed the work. Any changes in such circumstances and facts upon which this report is based may adversely affect any recommendations, opinions or findings contained in this report.

Version	Date:	Reviewer	Issued for:
Draft 1	281125	■	Review
Draft 2	041225	■	Review
Final Draft	081225	■	Client Review
Final	101225	■	Submission



1. Introduction

The following submission in relation to draft Amendment C477ggee has been prepared by Dominion Property Group, (DPG) on behalf of Avalon 2020, Avalon City and Avalon Lodge, collectively referred to as our “clients”.

Our clients are the owners of land located at:

- Avalon 2020: 65 Beach Road and 130 Pousties Road, Avalon;
- Avalon Lodge: 80 Pousties Road, Avalon; and
- Avalon City: 5 Beach Road, Avalon.

Refer Figure 1: Locality Map.

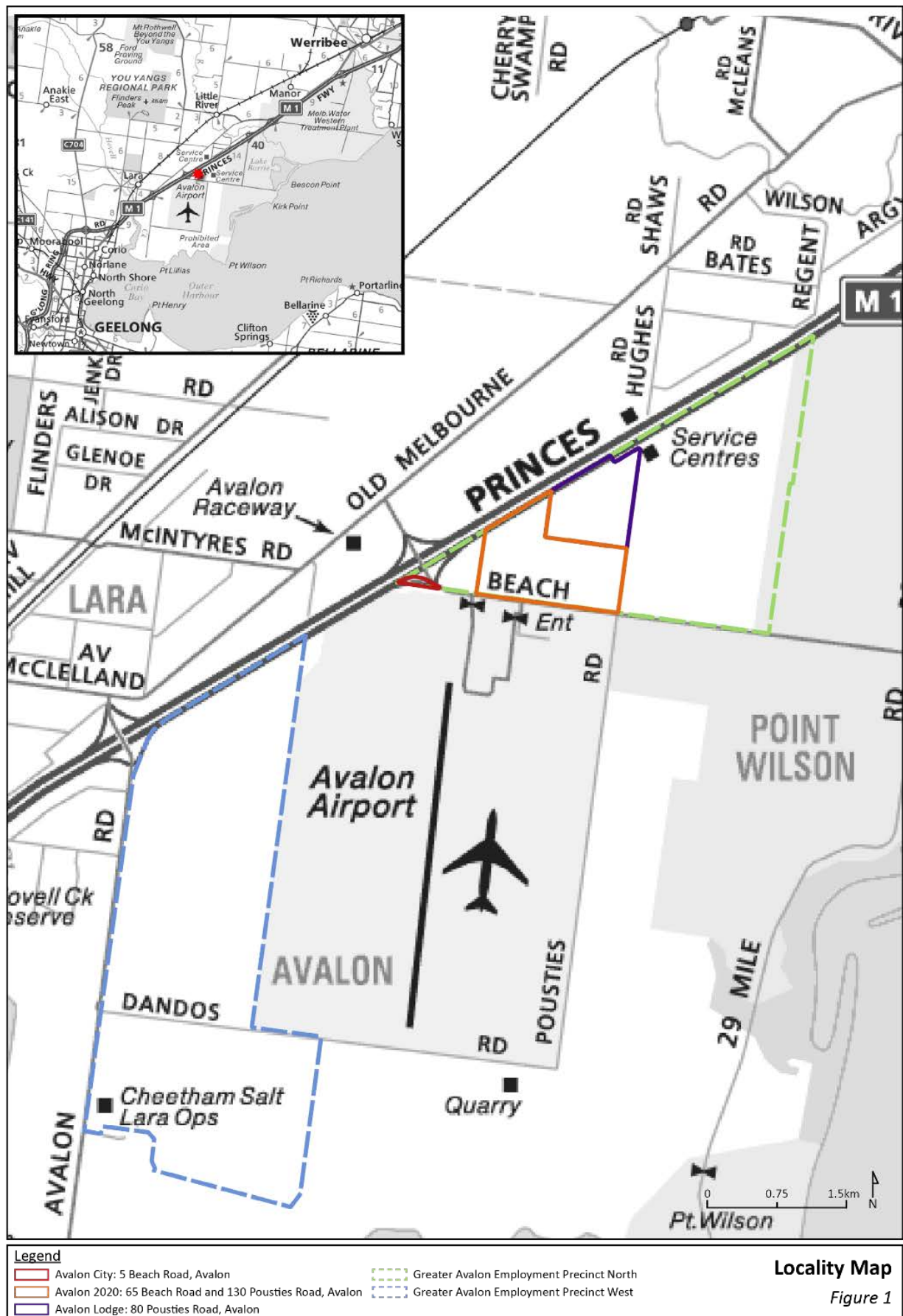
Combined, the three (3) sites, each located to the west of Pousties Road, form the majority of the subject land referred to in this submission as GAEP North (West of Pousties Road).

Our clients support the transition of their landholdings from farming to employment uses, but oppose the way that it is proposed to occur for the reasons set out in this submission.

In doing so, their commentary is confined to the area west of Pousties Road within which their landholdings are located. They acknowledge that in relation to the land east of Pousties Road that there are unresolved issues particularly in relation to biodiversity and drainage which do not arise in relation to the land west of Pousties Road.

Our clients contend that there is no reason why their landholdings, as well as the remaining landholding in GAEP North (West of Pousties Road), should not be rezoned using the same framework and substantive provisions that the draft amendment proposes for the Greater Avalon Employment Precinct West, (GAEP West). Our reasons follow.

In order to provide the opportunity for our clients to make oral submissions and call evidence, they respectfully request that the Minister refer these submissions to a Standing Advisory Committee, (SAC) to facilitate a transparent and independent review of the draft amendment. Given the issues raised, it would not be appropriate to constrain the Terms of Reference referred to the SAC.





2. Site Description

2.1 Avalon 2020: 65 Beach Road and 130 Pousties Road, Avalon

65 Beach Road and 130 Pousties Road, Avalon are located to the north of Avalon Airport and currently used for grazing and cropping purposes.

The two (2) Avalon 2020 land parcels abut each other with a total area of 120 hectares (ha). Each allotment contains 60 ha and together they form an 'L-shaped' configuration.

The combined site obtains vehicle access off Beach Road and Pousties Road and has road frontages of:

- Approximately 1,500 metres to Beach Road;
- Approximately 800 metres to the Princes Freeway; and
- Approximately 700 metres to Pousties Road.

The Avalon 2020 site is contained within two titles which are formally described as:

- Lot 1 on LP 213752D, contained on Certificate of Title Volume 09874, Folio 547; and
- Lot 2 on LP 213752D, contained on Certificate of Title Volume 09874, Folio 548.

The Certificates of Title are provided at **Appendix A**.

The Avalon 2020 site is generally level with a slight grade towards the southern boundary. The site contains pasture grasses and limited native vegetation. A constructed drainage line approximately 20 metres wide bisects the site between the Princes Freeway (northern) and Beach Road (southern) boundaries. This constructed drainage line contains planted eucalypts along its length that are more than 20 years old. The constructed drainage line was built as a result of the Princes Freeway construction and was required in order to manage overland flows from the land north of the Freeway.

The Avalon 2020 site contains no significant built improvements. Oil and gas easements traverse the property along the northern boundary adjacent to the Princes Freeway. A Public Acquisition Overlay in the form of a provision for future land acquisition for the purposes of a Transport Corridor which would link the Melbourne-Geelong Rail network to the Avalon Airport is also noted.

2.2 Avalon Lodge: 80 Pousties Road, Avalon

80 Pousties Road, Avalon comprises a single title located at 80 Pousties Road. The site is also located to the north of Avalon Airport and is located approximately 7 kms north-east of the Lara township.

The Avalon Lodge site is contained within a single title and is formally described as:

- Lot 1 on PS 427409, contained on Certificate of Title Volume 10554, Folio 753.

The Certificate of Title is provided at **Appendix B**.

The Avalon Lodge site is irregular in shape and contains an approximate area of 71 ha. The site has frontage to the Princes Freeway which forms the northern boundary however access is provided off Pousties Road, which runs along the eastern boundary of the site.

The Avalon Lodge site is generally flat; however it gently grades from north to south back towards nearby Avalon Airport and Corio Bay. The site is currently reverting to the farming enterprises of grazing and cropping after being left largely underutilised since the early 2000's.



Oil and gas easements traverse the property along the northern boundary adjacent to the Princes Freeway. In early 2005, a leak was detected in one of the oil pipelines located within the property. Shortly thereafter, Shell Oil (now Viva Energy) commenced contamination remediation operations on the site which included establishing a remediation and cleaning facility and installing an extensive network of subsurface remediation pipelines and groundwater monitoring bores.

We are advised that the site clean-up has been completed and the EPA has provided sign off confirming that the site has been appropriately remediated with the remediation plant, pipelines and groundwater monitoring bores removed from the site.

The letter from the EPA is provided at **Appendix C**.

2.3 Avalon City: 5 Beach Road, Avalon

5 Beach Road, Avalon is located directly south west of the Beach Road / Princes Freeway diamond interchange. The site is an irregular semi-circular shape with a curved northern boundary measuring approximately 432 metres that abuts the Princes Freeway and its associated “on ramp”. The site is effectively an “island site” and level throughout with an area of 2.63 ha.

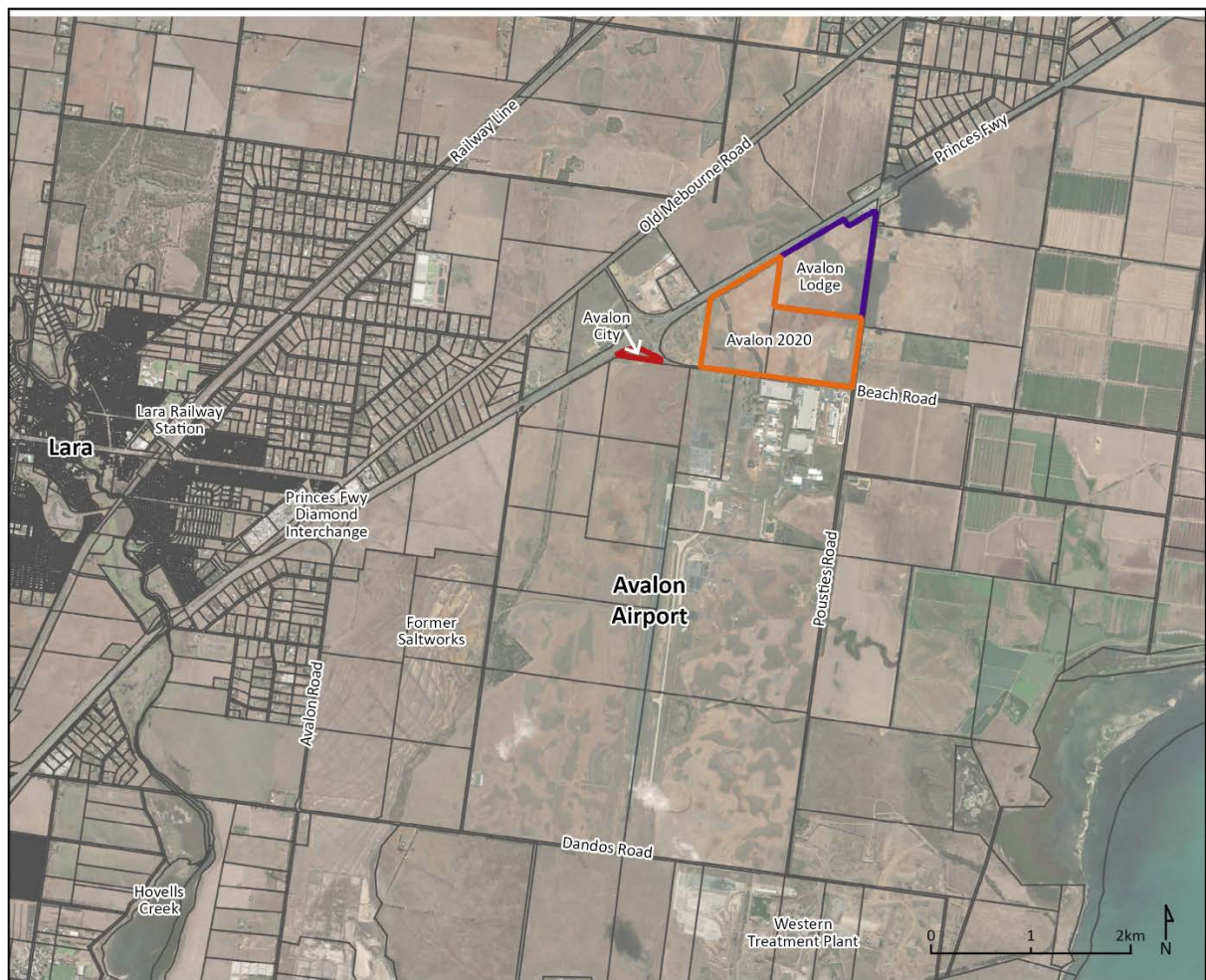
The Avalon City subject site is contained within a single title and is formally described as:

- Lot 1 on TP 711117B as contained on Certificate of Title Volume, 9286, Folio 535.

The Certificate of Title is provided at **Appendix D**.

The Princes Freeway comprises four (4) lanes in each direction as it abuts the site and is the key arterial vehicle route between Geelong and Melbourne. As such, the freeway provides the Avalon City site with significant daily commuter and commercial traffic volumes and a high level of exposure. Oil and gas easements traverse the property within its eastern sector.

Refer Figure 2: Site Context Map.



Legend

- Avalon City: 5 Beach Road, Avalon
- Avalon 2020: 65 Beach Road and 130 Pousties Road, Avalon
- Avalon Lodge: 80 Pousties Road, Avalon

Site Context Map

Figure 2



3. Current Land Use Zoning & Overlays

3.1 Avalon 2020: 65 Beach Road and 130 Pousties Road

65 Beach Road and 130 Pousties Road are located in the Farming Zone (FZ) pursuant to the Greater Geelong Planning Scheme (the Planning Scheme).

The following overlay controls apply to the site:

- *Environmental Significance Overlay, Schedule 4 (ESO4) 'Grasslands Within The Werribee Plains Hinterland'.*
- *Public Acquisition Overlay, Schedule 14 (PAO14)*

The acquiring authority for PAO14 is the Secretary to the Department of Economic Development, Jobs, Transport and Resources (DEDJTR) and is associated with future acquisition required for the alignment of the Avalon Airport Rail Link (AARL) project.

3.2 Avalon Lodge: 80 Pousties Road

80 Pousties Road is located within the Farming Zone (FZ) pursuant to the planning scheme.

The following overlay controls apply to the site:

- *The Environmental Significance Overlay, Schedule 4 (ESO4), 'Grasslands Within The Werribee Plains Hinterland' applies to the entire site.*
- *The Land Subject to Inundation Overlay (LSIO) partially applies to the north-east corner of the site.*

3.3 Avalon City: 5 Beach Road

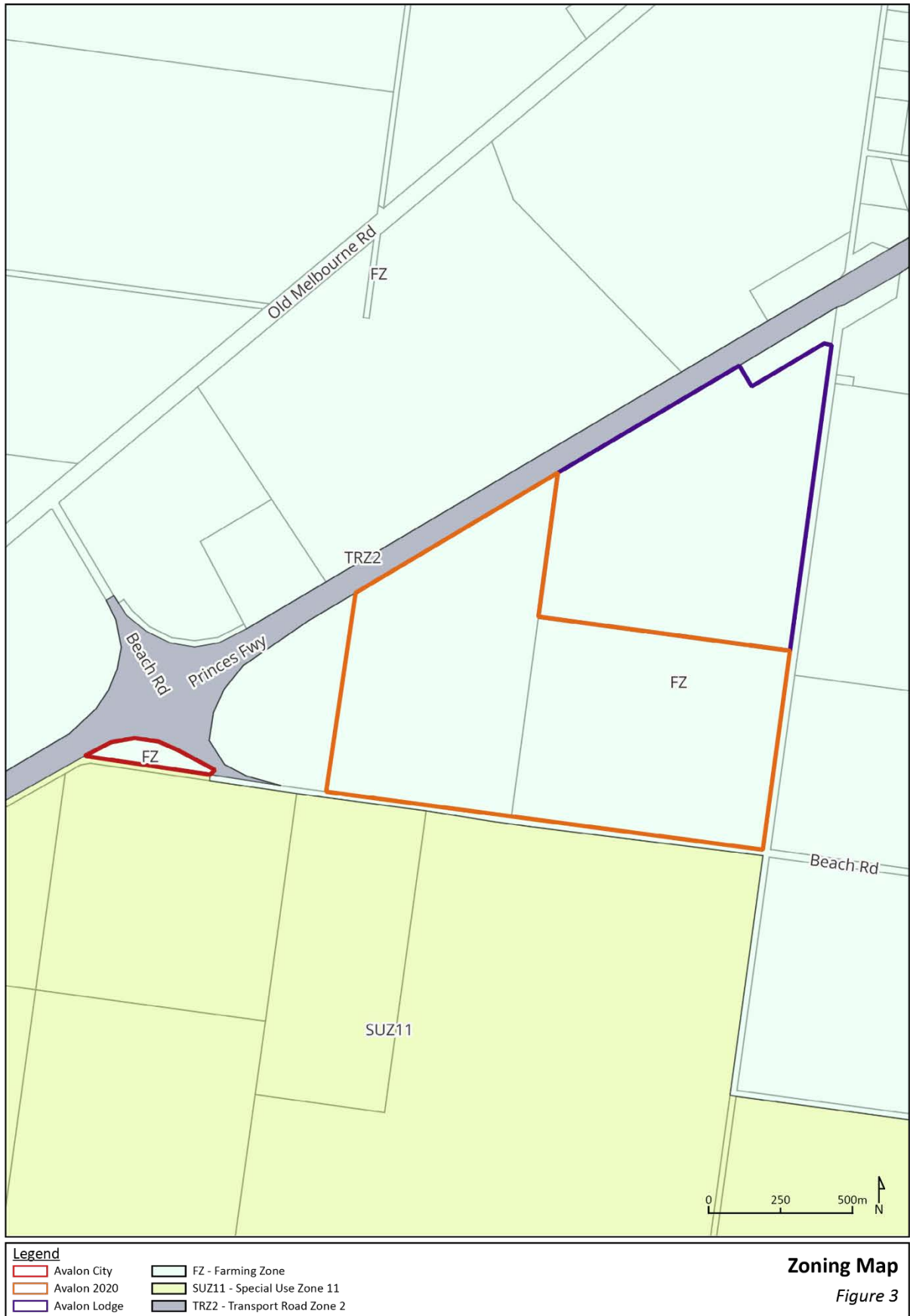
5 Beach Road is located within the Farming Zone (FZ) pursuant to the planning scheme.

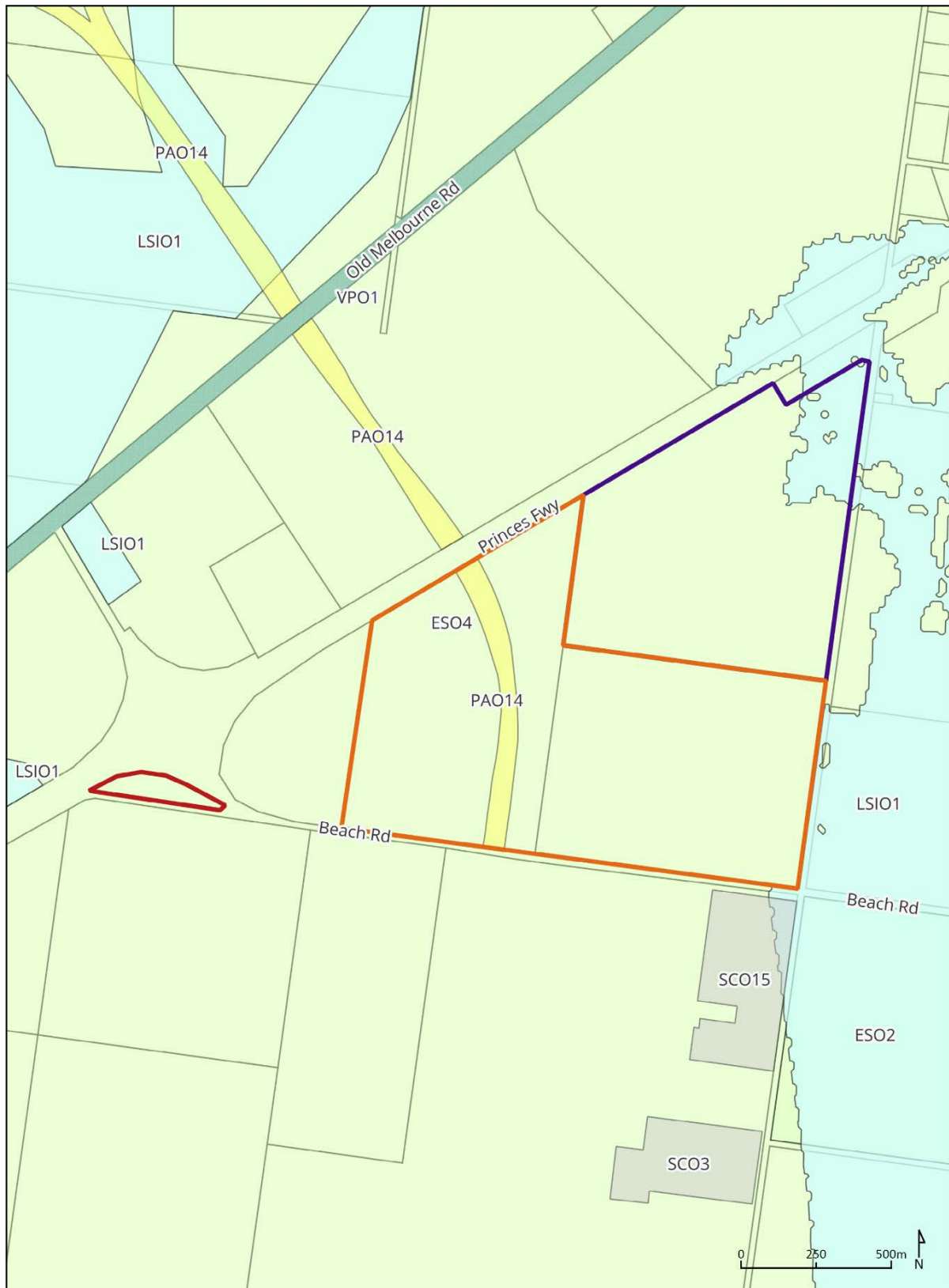
The following overlay control applies to the site:

- *The Environmental Significance Overlay, Schedule 4 (ESO4), 'Grasslands Within The Werribee Plains Hinterland' applies to the entire site.*

Refer Figure 3: Zoning Map.

Refer Figure 4: Overlay Map.





Legend

Avalon City	SCO - Specific Contributions Overlay	LSI0 - Land Subject to Inundation Overlay
Avalon 2020	PAO14 - Public Acquisition Overlay 14	ESO - Environmental Significance Overlay
Avalon Lodge	VPO1 - Vegetation Protection Overlay 1	

Overlay Map

Figure 4



4. The Greater Avalon Employment Precinct

The subject land forms part of the Greater Avalon Employment Precinct, (GAEP), a precinct that has been given priority status by the State. The GAEP comprises land with an overall area in excess of 1600 ha located directly to the north and west of the existing Avalon Airport. The inclusion of our client's landholdings within the precinct reflects what should be common ground: that the subject land is suitable to transition from farming use to industrial / employment / visitor economy uses.

The identification of the land as being suitable for future industrial / employment was confirmed via the previous "Avalon Corridor Strategy" (ACS), a document commenced in 2016, completed in December 2022 and facilitated by City of Greater Geelong, Wyndham City Council and DEWLP (now DTP). Key inputs to the ACS were provided via major stakeholders including state government, Melbourne Water, Avalon Airport, Wadawurrung Traditional Owners and significant landowners.

Refer Figure 5: ACS Framework Plan 2022

4.1 Funding of the Approvals Pathway

The overarching Avalon GAEP incorporating both Avalon North and West GAEP's was established in early 2023. A "Fast Track" PSP 2.0 rezoning process was initiated by the VPA to be delivered within a prescribed timeframe of no more than 2 years from commencement in order to give effect to this transition. Third Party Funding was only provided by landowners located within GAEP North (West of Pousties Road).

It is understood that landowners to the east of Pousties Road were unwilling to make a contribution to the PSP process on the basis that they were not in favour of their land being rezoned and wished to continue to use the land for agricultural purposes.

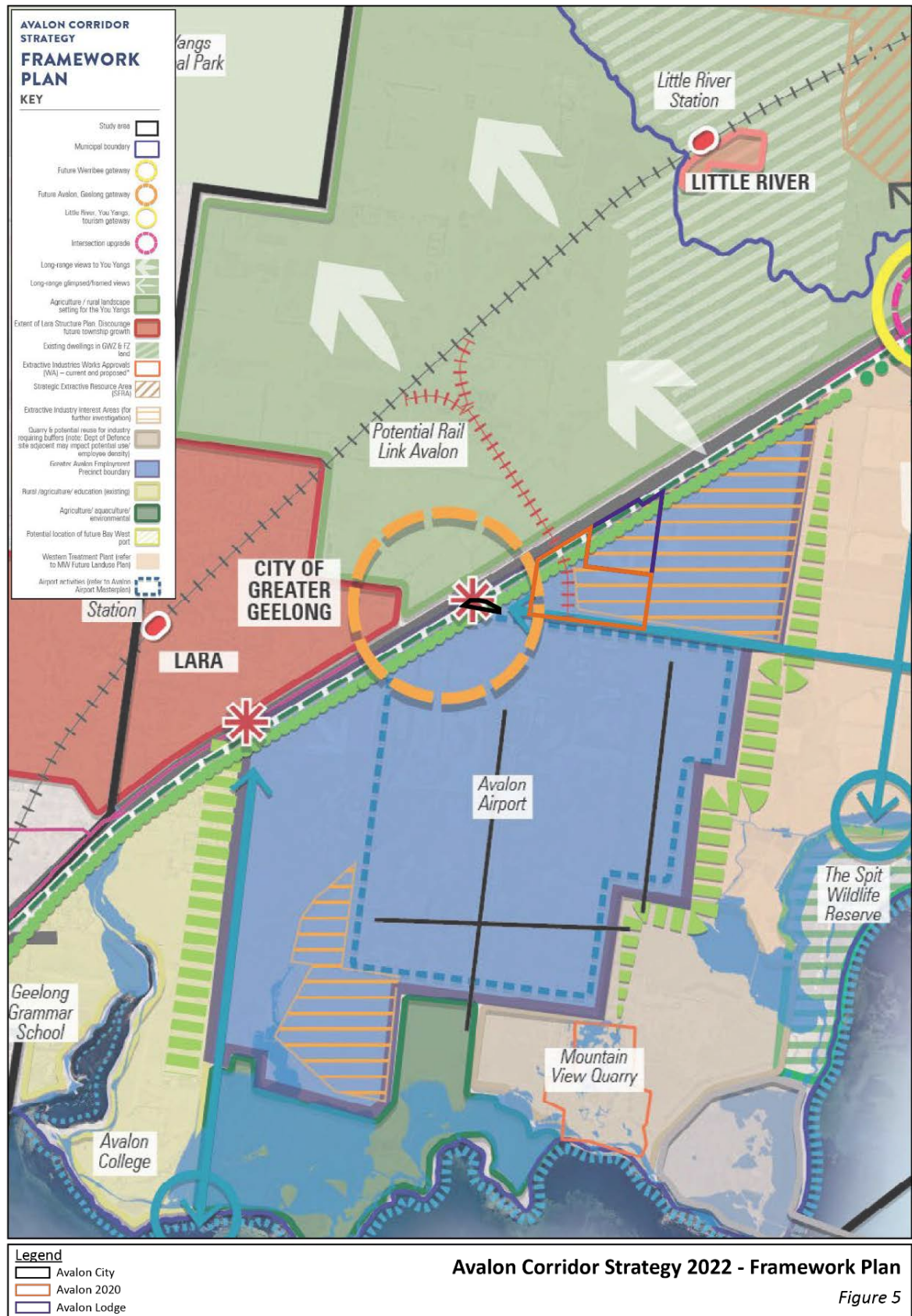
The reasonable expectation of our clients west of Pousties Road was, as is the usual outcome, that at the end of the process the subject land would be rezoned consistent with the ACS and to facilitate the objectives for the Greater Avalon Employment Precinct as identified as a State Significant outcome of Plan Melbourne.

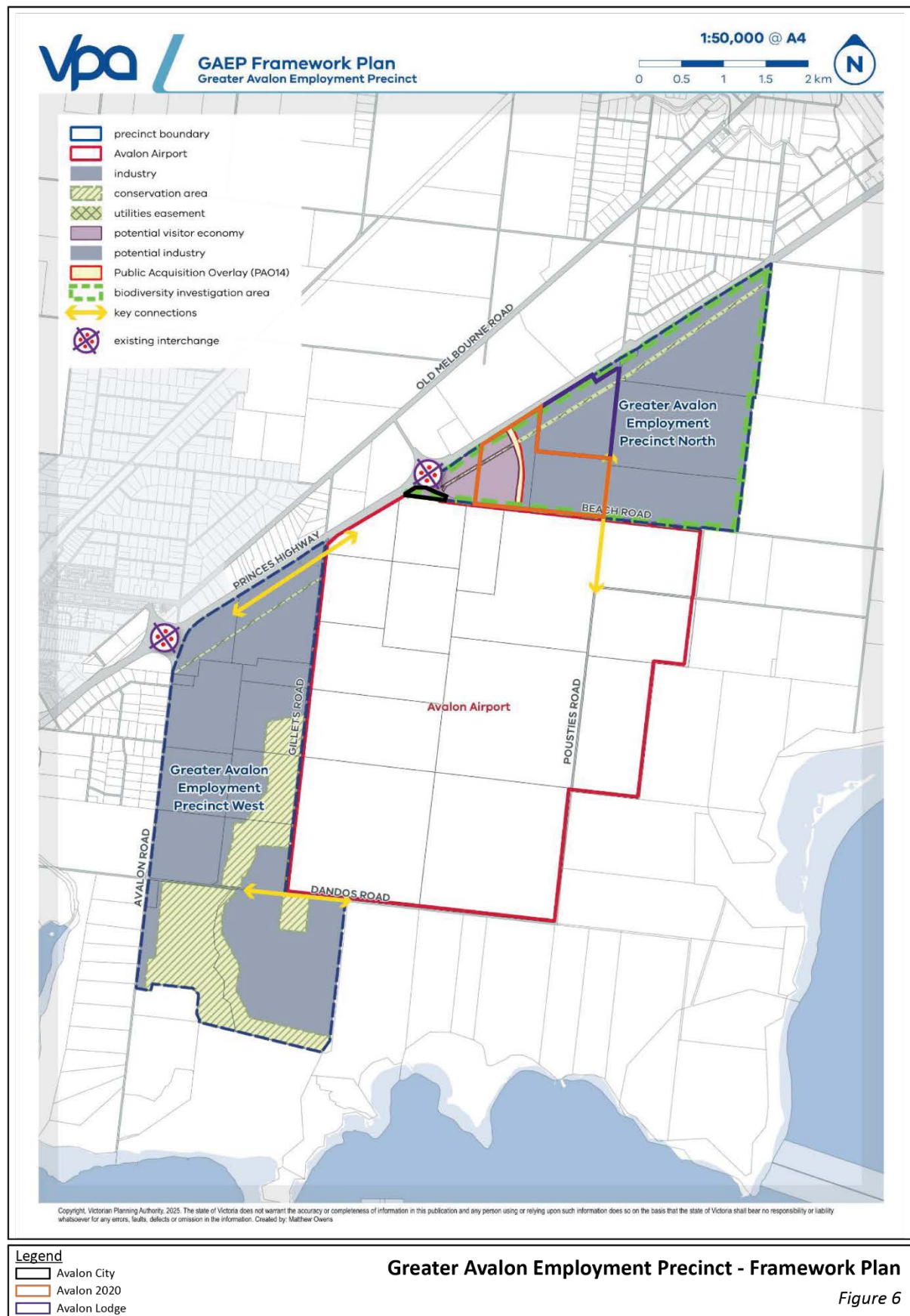
4.2 Unexpected Split of the GAEP North and West

In late 2024 the GAEP was unexpectedly split into two separate sub precincts comprising GAEP North and GAEP West. The "Background Report" to the draft Amendment states at p42 that the Minister formally acknowledged and supported the decision to split the Amendment on 12th December 2024. Noting that a project update meeting occurred involving the VPA project team and the landowners representatives on the 16th December 2024, it wasn't until early 2025 that our clients were made aware of this decision by an unrelated third party and not the VPA. The decision was then confirmed by the VPA when in a separate workshop attended by DPG and VPA officers.

GAEP North is triangular in shape and consists of approximately 600 ha of predominantly level and cleared agricultural land bounded by the Princes Freeway to the north, the Melbourne Water Treatment Plant to the east and Beach Road to the south. GAEP North is divided by Pousties Road which runs along a north / south alignment. The land to the east of Pousties Road and abutting the Melbourne Water Treatment Plant comprises an area of approximately 400 ha. The land to the west of Pousties Road comprises an area of approximately 200 ha.

All of our clients' landholdings are located in GAEP North and to the west of Pousties Road as indicated in **Figure 6 Greater Avalon Employment Precinct – Framework Plan**.







4.3 No Rezoning for GAEP North

Prior to mid-June of 2025, our clients had no reason to think that the PSP process would fail to deliver the rezoning of their land in GAEP North.

In response to this very issue an email received from [REDACTED] Strategic Planning Manager and dated 18 February 2025 stated:

“Following on from our meeting on Friday, we provide the following comments in relation to the timeframes for the Greater Avalon (Employment) Precinct:

- The project is a Housing Statement project which requires the VPA to complete the planning scheme amendment by June 2026. This timeframe applies to both the Greater Avalon (Employment) North and Greater Avalon (Employment) West areas.*
- The VPA continues to progress the amendment process to meet the June 2026 timeframe.*
- The amendment will then be considered by the Minister for Planning for gazettal. As you will be aware there is no specific timeframe that applies to this process, and it will be outside the VPA’s control”.*

On the 12 June 2025, the VPA arranged and facilitated a workshop to update the GAEP North landowners on the status of the project. At no time during this “in person” presentation were the landowners given any indication that their land would not be rezoned by the previously agreed target date of June 2026.

However, on the following day, 13 June 2025, an email was circulated to the consultant team and relevant landowners within GAEP North advising of a fundamental shift in the position of the VPA. The email states as follows:

“Dear Stakeholders,

Thank you to those who attended our workshop yesterday.

Following on from Melbourne Water’s presentation, we want to provide more information regarding the proposed draft amendment package and timing for delivery of the northern precinct given Melbourne Water’s drainage scheme solution is yet to be resolved concurrent to the VPA’s planning of the precinct.

DRAFT AMENDMENT FOR CONSULTATION

We are currently working towards a draft Amendment package for the Greater Avalon Employment Precinct (GAEP) with the aim to consult commencing August 2025. This will include the following:

- A new Local Policy that includes a framework plan for the whole precinct (GAEP North, GAEP West and Avalon Airport) and sets out direction for the four matters of State interest (Airport operations, biodiversity, drainage and State transport infrastructure), and a staging approach. The staging approach sequences rezoning of the western area first (as part of this amendment), followed by the northern area subject to criteria being met.*
- Rezoning of GAEP West.*
- Introduction of the Development Plan Overlay to GAEP West.*

We acknowledge that the two phased staging approach will be new information to all landowners in GAEP, both north and west.”

Nb: “**bold**” highlight above as per VPA email.



The above email makes it clear, for the first time, that what is proposed for GAEP North would not be rezoned as part of the amendment. Instead, a policy would be introduced that set out trigger points that must be satisfied before any rezoning could occur.

This represented a fundamental departure from the stated intent of the “fast track” PSP 2.0, which our clients agreed to with the VPA and funded in full.

A clear rationale for this change has not yet been provided although the above email of the 13th June 2025 goes on to state as follows:

“A summary of the rationale is provided below, noting full details will be available at the time the draft amendment package is on consultation.

Airport Operations and State Road Infrastructure

- *The need to ensure an overarching integrated land use and transport framework to support future Avalon Airport operations and its role in air, freight, and regional tourism, and the adjacent Commonwealth Point Wilson operation to the south. The capacity of the Beach Road interchange (with the Princes Freeway) will be made available to transport generated by Avalon Airport and Point Wilson.*
- *Similarly, the capacity of the Avalon Road interchange will be available to vehicles generated by GAEP west as it develops.*
- *Transport modelling will identify the point at which no capacity exists at Beach Road, at which time upgrade will be possible to include the vehicles generated by Airport, Point Wilson and development associated with the northern precinct.*
- *Economic modelling which has identified that the precinct (including Avalon Airport) has many decades of industrial land supply that will require the application of a staged approach.*

Drainage & Biodiversity

- *The complexity of drainage to be resolved by Melbourne Water where GAEP North interfaces the Western Treatment Plant triggering referral under the Commonwealth Environmental Protection and Biodiversity Act (EPBC Act).*
- *The Development Plan Overlay Schedule for the west requiring drainage and biodiversity strategies to meet Agency and Commonwealth EPBC Act requirements prior to development commencing.*

The VPA remains committed to delivering the planning scheme amendment by June 2026, and propose a decoupled approach informed by infrastructure capacity.”

The above factors were not raised at any stage prior to mid-June 2025, as potential factors which could delay the rezoning of GAEP North, within the two-year timeframe set, despite June 2025 being 2.5 years after the commencement of the “fast track” 2.0 PSP process funded by our clients.



5. Response to Amendment C477 Specialist Reports

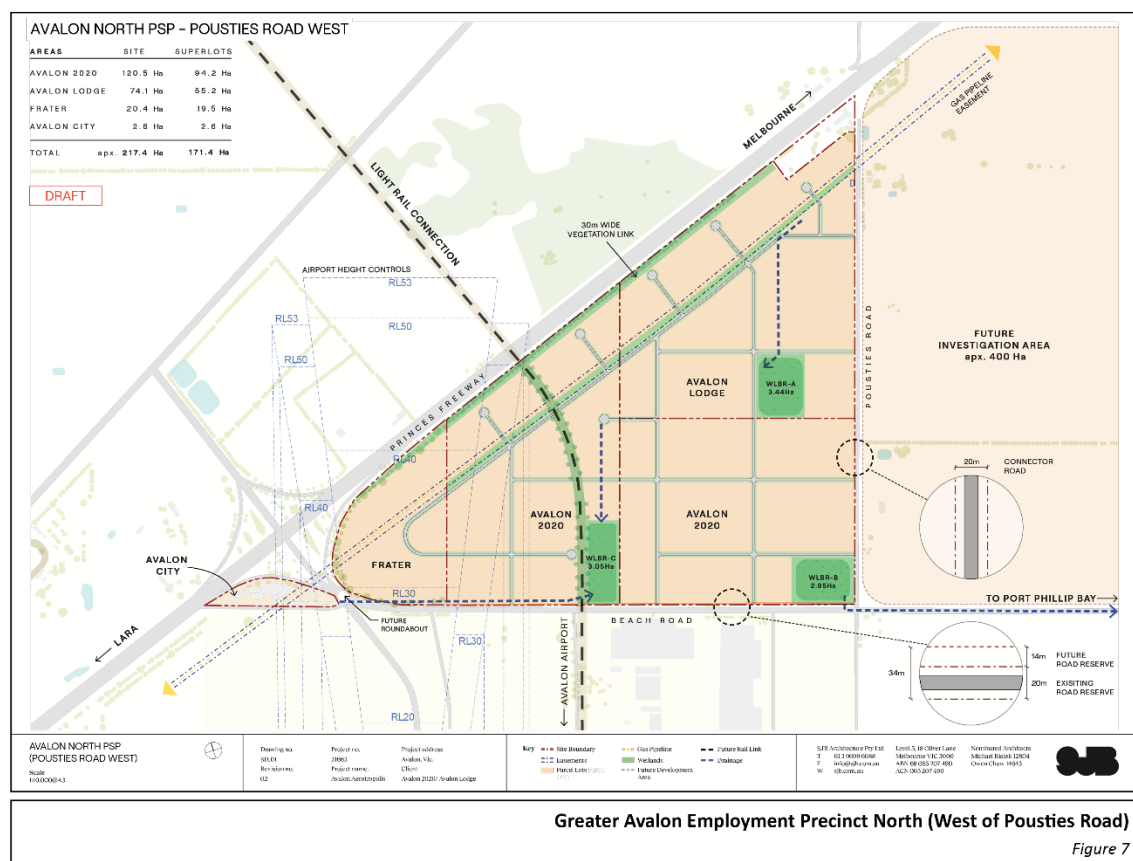
We have now had an opportunity to review the specialist reports prepared by the VPA on behalf of the landowners of both the GAEP West and GAEP North precincts.

With specific relevance to GAEP North we make the following observations. The Avalon North GAEP currently comprises an area of approximately 620 ha. This consists of approximately 403ha to the east of Pousties Road and 217 ha to the west of Pousties Road.

Whilst all the land within the GAEP North is typified by open farmland, the area can be further split into two (2) sub-precincts comprising GAEP North (West of Pousties Road) and GAEP North (East of Pousties Road).

By dividing the GAEP North in this manner we can see that GAEP North (West of Pousties Road) benefits from specific attributes that respond to the concerns and issues as outlined above in Section 4.0. In addressing these stated concerns, GAEP North (West of Pousties Road) would be a logical Stage 1 rezoning area which is “shovel ready” and able to be developed without impediments.

Refer Figure 7: SJB Concept Plan / Greater Avalon Employment Precinct North (West of Pousties Road)





5.1 Gateway Location

The land comprising GAEP North (West of Pousties Road) is situated directly opposite the main entry to Avalon Airport. It sits within a key location bounded by the Princes Freeway, Beach Road and Pousties Road.

Significant freight and logistics facilities are located within Airport land directly opposite the site and to the south of Beach Road. These include Cotton On, Pet Stock, Hanwha, Victoria Police, and Australia Post manufacturing and distribution facilities.

Importantly the land comprising GAEP North (West of Pousties Road) contains the PAO for the proposed rail extension into Avalon Airport.

5.1.1 Summary

The rezoning of GAEP North (West of Pousties Road) will lock in the ultimate zoning outcomes proposed for this location consistent with existing and proposed development. The land interfaces with existing development and is “shovel ready”.

5.2 Avalon Airport

We have met with Avalon Airport to discuss any concerns they may have which the VPA claimed could hinder development of the North Precinct.

The Avalon Airport operators have expressed no concern with the proposed rezoning of our clients’ land within GAEP North (West of Pousties Road). Indeed, they welcome it mindful of the opportunity it provides for the delivery of infrastructure that would not otherwise be deliverable absent rezoning.

The airport also acknowledges that Beach Road requires significant upgrading between the Freeway and Pousties Road in order to provide improved traffic access to the airport and the freight and logistics facilities located to the south.

The land located to the east of Pousties Road is more isolated in development terms and its redevelopment is considered to contribute little to the future and ongoing role of the Airport.

5.2.1 Summary

The Airport has expressed a desire to see development to the north of Beach Road which provides a presence to the Airport both along the Princes Freeway and to the direct airport main entrance.

The rezoning of GAEP North (West of Pousties Road) will facilitate a road widening along the northern alignment of Beach Road along with required Developer Contributions that can be directed towards the upgrading of the Beach Road alignment at this point.

5.3 Flooding and Drainage:

We have reviewed the following documents:

- *Alluvium / Memo / Greater Avalon Employment Precinct – Existing Conditions Flood Modelling - May 2024; and*
- *HARC / GAEP West Development Plan Overlay / Position Paper – November 2025.*
- *Victorian Planning Authority / Background Report / Greater Avalon Employment Precinct / Wadawurrung Country/ November 2025.*



5.3.1 Flooding

A technical memorandum from Alluvium is dated May 2024 but was not made available to our clients until it was placed on consultation as part of the draft Amendment. It is technical in nature but appears to show that there are limited and readily manageable flooding impacts existing in relation to GAEP North (West of Pousties Road). Adverse flooding impacts east of Pousties Road would seem to be more pronounced.

Additional analysis undertaken on behalf of our clients by DPM indicates that flooding and overland flow can be managed appropriately via a drainage strategy and drainage services scheme at this point.

Again, the same flood mapping indicates that the land to the east of Pousties Road is subject to extensive flood impacts which raise additional challenges in terms of mitigation and management.

The VPA's own Background Report acknowledges that *"flooding and water flow are significant constraints for the precinct and will need to be addressed in future drainage designs."* When the two precincts are compared, we can see that the GAEP North (West of Pousties Road) is only marginally impacted with the majority of flooding and waterflow issues being located throughout GAEP West.

5.3.2 Drainage

The Background Report prepared by the VPA acknowledges that the GAEP initially commenced as a PSP, with Alluvium engaged to prepare flood modelling and an overall drainage strategy for the whole precinct.

The Background Report goes on to state that *"Melbourne Water's investigations into the DSS for GAEP North currently involve assessing the viability of flow outfalls, and what the approvals pathway would be. **GAEP North's drainage context is more complex than in GAEP West as it drains into the Western Treatment Plant**, triggering additional EPA and WTP approval processes."*

The land to the east of Pousties Road directly abuts the Melbourne Water Western Treatment facility along the entire length of its eastern boundary. The direct abuttal to the Western Treatment lands is understood to create significant issues of concern for Melbourne Water in terms of the extensive state and national approvals regime required to facilitate development at this point in addition to the complexity of drainage issues that arise as a result of potential RAMSAR impacts.

The rezoning of GAEP North (West of Pousties Road) can be achieved in the near term, whilst the more complex redevelopment matters attached to the land east of Pousties Road are resolved.

The HARC position paper placed on consultation as part of the draft Amendment is interesting. The purpose of the position paper was to support the drafting of the DPO within GAEP West from a stormwater drainage and hydrological perspective.

HARC said in its introduction:

"It is important to acknowledge that this paper and the DPO are not intended to produce a drainage strategy or provide the solution for the ultimate outfall, rather outline the steps required to be able to plan and achieve this ... HARC have formed the opinion that this site is developable from a stormwater, drainage and hydrological viewpoint. The uncertainty surrounding the impacts of the development on off-site environmental values such as the Avalon Coastal Reserve (ACR) and the Ramsar wetland that envelopes the Corio Bay coastline have been a key challenge in progressing planning phase for GAEP West."



Referencing the position paper of HARC, we submit that the City of Greater Geelong, (CoGG) and/or the Corangamite Catchment Management Authority, (CCMA) could equally have taken a view as has been taken by Melbourne Water that the rezoning of GAEP West was premature given a number of unresolved matters.

“HARC considers it prudent to apply a cautious approach in developing a drainage strategy for the site because of need to resolve complex and bespoke drainage issues. For example, the proposal to include wetlands and open waterways is necessary from a water quality treatment perspective and environmental and landscape sensitivity point view. However, these water quality treatment solutions have the potential create aircraft hazards by attracting wildlife. Similarly, the perception that the development should protect the ACR from changes in hydrological regimes associated with the increased impervious surfaces and yet it appears to be acknowledged that freshwater is important for salt marsh habitats...”

Mindful of the complexities facing GAEP West, the VPA’s own Background Report acknowledges that ***“GAEP West will be impacted by sea level rise at its southern end.”***

Refer Figure 8: Alluvium / Flooding and Sea Level Rise Extents

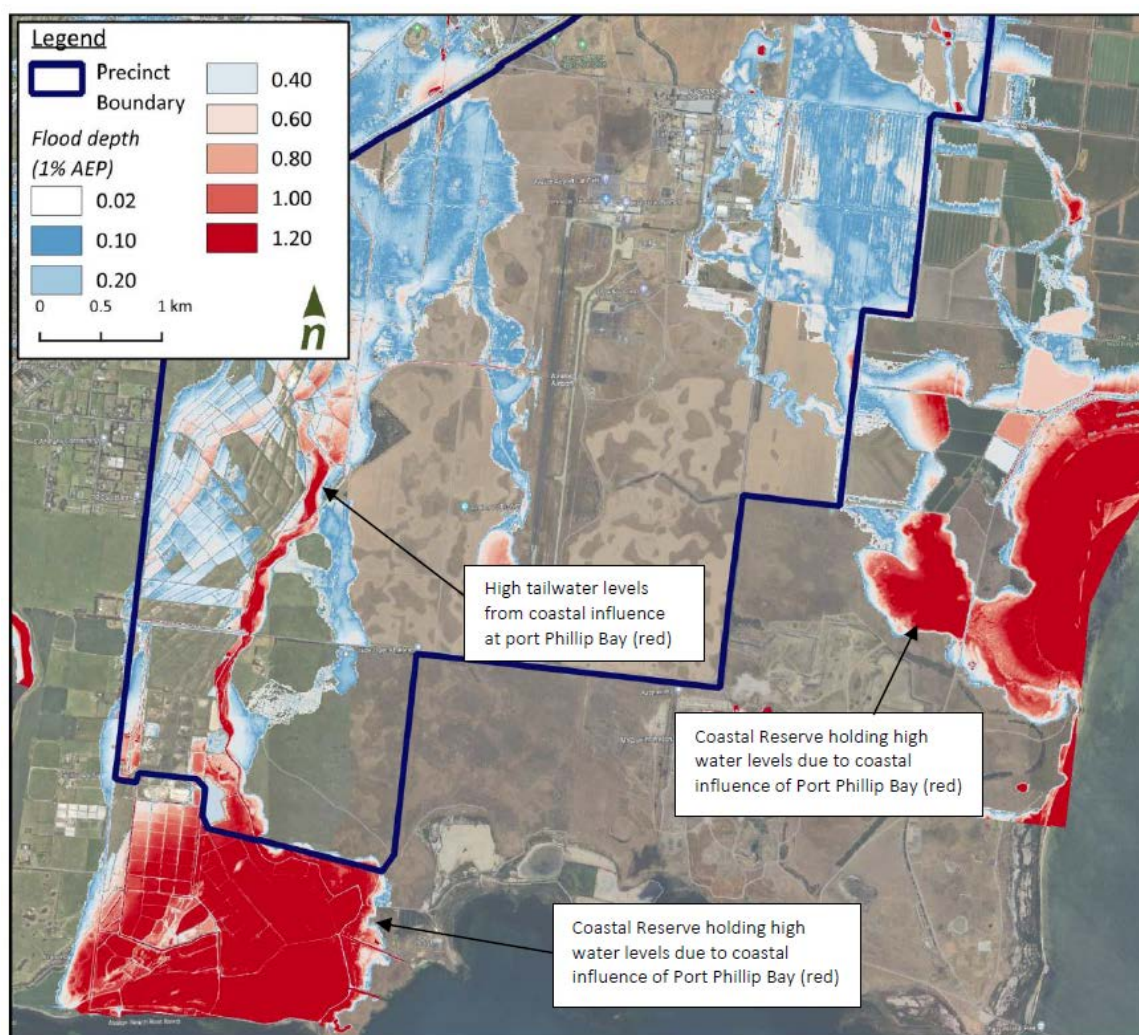


Figure 8: Flooding and Sea Level Rise Extents (Alluvium)

5.3.3 Summary

The Alluvium assessment shows that there are limited and readily manageable flooding impacts existing in relation to GAEP North (west of Pousties Road). Further, the HARC position paper



reinforces the submissions that we have made to VPA on behalf of our clients that drainage is not a reason for preferencing GAEP West over GAEP North and certainly not GAEP North (West of Pousties Road).

The Melbourne Water position regarding GAEP North (West of Pousties Road) appears to be directly at odds with the position adopted by the VPA on behalf of the Corangamite Catchment Management Authority (CCMA) and the Greater Geelong City Council (CoGG) in relation to GAEP West.

We maintain that there does not appear to be any satisfactory reason as to why there should be a fundamentally different approvals approach to the same drainage issues affecting the two precincts. Both GAEP West and GAEP North (West of Pousties Road) should be rezoned concurrently.

Recent discussions with Melbourne Water indicate their preference to continue to apply a differing approach as compared to that being applied in GAEP West by the VPA. If Melbourne Water's current position were ultimately to be adopted, then our preference would be to split GAEP North (West of Pousties Road) to comprise C477ggee Part 2 and allow Melbourne Water to complete the work that it says is necessary.

5.4 Biodiversity:

We have reviewed the following documents:

- *Ecology and Heritage Partners Pty Ltd / Final Report / Biodiversity Assessment for the Greater Avalon (Employment) Precinct, Avalon, Victoria. Prepared for: Victorian Planning Authority / October 2025.*

Extensive flora and fauna assessments have been undertaken by EHP across all of the land located within both GAEP West and GAEP North (West of Pousties Road) over a period of 45 days.

The extent and value of the flora and fauna within land to the east of Pousties Road remains largely unknown at this time as access to a large swath of this area was not permitted by the relevant landowners at the time of VPA specialist assessments being undertaken. There were two properties east of Pousties Road where access was not possible, and it is in relation to those parcels that EHP are recommending further survey work.

5.4.1 Flora

We note that the EHP report found 2.0 ha of native vegetation within GAEP North (West of Pousties Road) as compared with 177.4 ha of native vegetation within GAEP West. In addition, the survey found 449.84 hectares of "current wetlands" within GAEP West, but it would appear that there are none within GAEP North (West of Pousties Road).

It would also appear that there has been a significant reduction by DECCA of its mapped wetland, since finalisation of the EHP Report, so that only 59 ha are now modelled to occur within the study area.

In relation to native vegetation, Plains Grassland was classified in two habitat zones namely PG1 and PG2 across GAEP North (West of Pousties Road) and GAEP West but both were described as follows:

"All patches of Plains Grassland were relatively species poor, with differences in quality predominantly due to the cover of weeds and patch size."

However, those mapped patches of PG1 and PG2 were considered to meet the description for the State significant Western (Basalt) Plains Grassland vegetation community.



5.4.2 Fauna

In terms of fauna, the EHP report concluded that despite the modified condition of native vegetation habitat, the overall study area that is both north and west supports confirmed habitat for the Golden Sun Moth, Growling Grass Frog, Curlew Sandpiper, Blue-winged Parrot and the State significant Tussock Skink, Fat-tailed Dunnart and Little Eagle.

In section 2.6.2 there is a discussion on Matters of National Environmental Significance, (MNES) and specific discussion at 3.6.21 on the Victorian Grassland Earless Dragon, (VGED) with a conclusion that it is unlikely that there is a potential that this species would occur.

However, it appears that Biosis has undertaken a targeted survey within GAEP West in 2025 and did not record any of the above, concluding that it is unlikely that the proposed development within the west would have a significant impact on VGED. EHP recommends targeted surveys for suitable VGED habitat within the north.

Our conclusion from the discussion in relation to MNES is that apart from the Earless Dragon, it is unlikely that other species would be present or that the removal of habitat that might otherwise be available for such species would have a significant impact. The qualification is in relation to those properties that were not assessed.

In relation to the issue of discharge to the Ramsar site, the EHP report recommended, *“Further investigations to understand the current volume and timing of existing flows into the Ramsar site from the GA(E)N and GA(E)W must be undertaken to allow the consideration of the potential ecological changes to the character of the Ramsar site that could potentially result from alterations to pre-development flows, and further determine how these changes can be appropriately minimised...”*.

5.4.3 Summary

Ultimately, the EHP report concluded at 4.1.1 that:

“The rezoning of land within the Greater Avalon Employment Precinct, (GA(E)P) would not constitute a significant impact to any matter of MNES identified within the study area...” except for the Golden Sun Moth where EHP concluded that dependent upon the extent of confirmed habitat proposed to be removed, the project has the potential to constitute a significant impact.

The proposed rezoning of GAEP West relies upon the same documents that should reasonably be relied upon to rezone GAEP North (West of Pousties Road). The development of GAEP North (West of Pousties Road) should not be held back as a result of unrelated environmental issues potentially impacting land further east.

The EHP report does not present any significant impediment to the rezoning of GAEP North (West of Pousties Road).

5.5 Land Supply

We have reviewed the following documents:

- *SGS Economics & Planning / Greater Avalon Employment Precinct Economic & Scoping Study and Planning Framework. Prepared for: Victorian Planning Authority / November 2025.*
- *Victorian Planning Authority / Background Report / Greater Avalon Employment Precinct / Wadawurrung Country/ November 2025.*

It is noted that the northern precinct referenced in the SGS report includes all of the GAEP North land east and west of Pousties Road. This is a very troubling document given that it anticipates development of the north commencing in 2056.



Given that it is only 171 ha of net developable area, (NDA) that our clients now seek to have rezoned via GAEP North (West of Pousties Road), it may be that the timeline would be brought forward considerably but it remains a concern if the criteria for advancing a rezoning is establishing need on the basis of this report.

The rezoning of GAEP North (West of Pousties Road) removes approximately 400 ha of developable land from the rezoning process. The rezoning of the land to the west of Pousties Road only, will restrict the amount of industrial land to be released in addition to that contemplated within GAEP West to a further 170 ha only.

The SGS report was prepared on the basis of an analysis of the whole of the GAEP North precinct and the GAEP West precinct. It is submitted that a number of the assumptions made are questionable. Further, if rezoning was confined to the land west of Pousties Road that would produce only 170 ha of net developable land. This will have a significant impact on the conclusions reached by SGS.

Further, SGS did in its report acknowledge that the GAEP North precinct is a different offering to that of GAEP West. This is understandable given the GAEP North's immediate co-location with the entry to Avalon Airport and with the existing industrial development south of Beach Road.

5.5.1 Summary

As noted by the VPA in their own Background Report:

"The precinct is also located near some of Victoria's fastest-growing residential corridors – Geelong to the south-west and Wyndham/Melton to the north-east – reinforcing its role in supporting employment and economic development."

Our clients submit that the amendment should not proceed on the basis that it is either the west or the north in the short to medium term. Given the different physical location of the two precincts and the identified lack of employment land in this region, it is submitted that it is entirely appropriate for both the GAEP West and GAEP North (West of Pousties Road) to come on stream at the same time. After all, it is submitted that competition as a by-product of available land supply should be considered a positive outcome.

The inclusion of GAEP North (West of Pousties Road) at this time presents only a modest addition to the industrial land release currently being contemplated via the overall GAEP.

5.6 Transport

We have reviewed the following documents:

Jacobs / Strategic Transport Modelling Assessment Report / Greater Avalon Employment Precinct / Prepared for: Victorian Planning Authority / 5th November 2025.

Jacobs have modelled a number of scenarios comparing the base case of present existing conditions with developed conditions in 2056. This is an approach that is unusual.

The GAEP West and GAEP North (West of Pousties Road) will develop over that period of time and surely what is required is an assessment of the staging of upgrades to infrastructure that would be required as the precinct develops indeed as Avalon Airport develops.

There is nothing in the reports that have been prepared which, we believe, would inform what infrastructure is required and when to support the progressive development of the two precincts and Avalon Airport so we question the worth of the modelling.

It's not surprising that, the modelling concludes that at full development of both precincts and, for example, a 50% build out of Avalon that both the Beach Road and Avalon interchanges would be over capacity and roads around the Avalon Airport would be over capacity as well.



It is also interesting that various scenarios presume the full development of the GAEP North by the year 2056 and compare that with the SGS report.

5.6.1 Summary

The work done by Jacobs does not support any conclusion that there are traffic related reasons as to why the GAEP North (West of Pousties Road) could not presently be rezoned to develop for employment purposes. We strongly disagree with the approach taken by Jacobs and seek that this issue be subject to significant revision and inputs by our experts to assist in a more balanced approach.

5.7 Land Capability

We have reviewed the following documents:

- *Jacobs / Land Capability Assessment / Greater Avalon Employment Precinct / Prepared for: Victorian Planning Authority / 9th April 2025.*
- *Victorian Planning Authority / Background Report / Greater Avalon Employment Precinct / Wadawurrung Country/ November 2025.*

5.7.1 Adverse Amenity

The Jacobs report notes that *“the Northern GAEP Area is approximately 641 hectares and contains nine parcels of land. It is in the Farming Zone. It is bounded by Princes Highway to the north. Given the surrounding land uses and the separation created by Princes Highway, it is considered that there **would not be any significant adverse amenity impacts** caused by the proposed development of the Northern GAEP Area.*

The South-western GAEP Area is approximately 940 hectares and contains thirteen parcels of land. The area in the north is in the Farming Zone and the area in the south is in the Special Use Zone Schedule 1 Environmental Wetlands, Salt Production and Land-Based Aquaculture Activities (SUZ1). It is also bounded by Princes Highway to the north.

*There **could be potential amenity impacts to the residents in the township of Avalon and Lara.** These sensitive land uses would be sensitive to emissions from industry and other uses due to their impact on amenity, human health and safety. The sensitive uses will differ depending on the type of industry or other use and this is not yet known for the GAEP Area. The Buffer Area Overlay (BAO) could be used to accommodate off-site impacts away from the residential areas of Avalon and Lara.”*

5.7.2 Summary

As the report notes, there would not be any significant adverse amenity impacts caused by the proposed rezoning and development of GAEP North (West of Pousties Road). However, and significantly, there could be potential amenity impacts to the residents in the township of Avalon and Lara as a result of the proposed rezoning and development of GAEP West.

5.7.3 Contamination

Three land parcels within GAEP North (West of Pousties Road) were previously subject to a clean-up as a result of a white oil spill from a VIVA Pipeline.

The Jacobs report notes that property numbers 5 (parcel 1\PS427409), 6 (parcel 1\LP213752) and 7 (parcel 2\LP213752) were subject to remediation as a result of the WOPL leak that occurred in 2004 and that remediation has now been completed to the extent practicable.



5.7.4 Summary

The report states that based on the information described in this report, there does not appear to be any significant constraints from a site contamination perspective which would render the land unsuitable for proposed future non-sensitive land use (i.e. commercial, industrial or open space use).

The land in question has now been decontaminated over a number of years and is no longer contained within the EPA's contaminated sites register. Contamination is therefore no constraint to the rezoning GAEP North (West of Pousties Road).

5.7.5 Geotechnical

The Jacobs report notes that *"sodic soils with a dispersive nature are present in the proposed GAEP area. These soil characteristics could lead to erosion of drainage channels/features and associated blockage/sedimentation of downstream drainage areas or undermining of constructed works. Sodic soils by their characteristics are highly problematic for construction materials if untreated or not improved"*.

The report goes on to note that *"Areas subject to poor drainage may comprise soft material which provides low bearing capacity for foundations"*.

5.7.6 Summary

Significantly, the above issues are identified and attributed to land within GAEP West and not the land within GAEP North (West of Pousties Road).

Geotechnical issues are therefore no constraint to the rezoning of GAEP North (West of Pousties Road).

5.7.7 Hydrogeology

The Jacobs report notes that *"shallow depth to groundwater is likely to occur over large portions of the precinct area. The shallow water table may cause groundwater inflow to excavations and may impact site drainage (i.e. cause waterlogging). There may be areas that have poor sub-soil drainage and are susceptible to waterlogging"*.

The report goes on to note that *"groundwater dewatering or extraction associated with development has the potential to reduce discharge to nearby surface water features and/or terrestrial GDEs, which could potentially have a negative impact on the ecological health of local groundwater receptors"*.

5.7.8 Summary

Again, the above issues are identified and attributed to land within GAEP West and not the land within GAEP North (West of Pousties Road).

Hydrogeology issues are therefore no constraint to the rezoning of GAEP North (West of Pousties Road).

5.7.9 Hydrology

The Jacobs report notes that the *"due diligence study has identified that the GAEP area falls within a floodplain exposed to riverine flooding, flooding from local stormwater, storm surge, and climate change sea level rise impacts. Future development in the area has the potential to influence existing overland flow paths in addition to impacting the project area drainage strategy, floodplain storage, land imperviousness, and the associated flood risk."*

As such, it is expected that future development across the site will require:



- A detailed flood modelling and flood study.
- Early consultation and liaison with flood authorities to understand design criteria/expectations and future drainage schemes.
- To seek construction permit from the relevant flood authorities and discuss working adjacent to an open channel and/or within LSIO/flooding extent and the required setback or the appropriate flood risk management strategies.

The VPA's own Background Report goes on to state as follows:

"The precinct is generally flat over a wide area, ranging from 1 to 18 metres above sea level sloping south towards Port Phillip Bay over a large area. A significant section of the western part of the precinct at the former saltworks was terraformed for saltponds".

Refer Figure 9: VPA / Contour Plan

5.7.10 Summary

The issues of "storm surge, and climate change sea level rise impacts" as noted by Jacobs relate solely to GAEP West and not GAEP North (West of Pousties Road). In this regard it can be seen that the hydrology issues impacting on the land within GAEP North (West of Pousties Road) are significantly less than those impacting GAEP West.

With reference to sea level, we note that the low lying areas referenced and most susceptible to the issue of sea level rise are within the GAEP West only. The GAEP North (West of Pousties Road) is situated on one of the highest points of the overall GAEP.

Noting the above, it remains a recommendation of the Jacobs report that early consultation with flood authorities including both Melbourne Water and Corangamite Catchment Management Authority be prioritised when planning future development.

5.7.11 Geomorphology

The Jacobs report identifies that the GAEP Area is located on soils that have formed from weathering of local New Volcanic Basalt rock, Quaternary Alluvium and Coastal Deposits.

"They may have characteristics that are similar to sodic/dispersive soils that have been assessed in other Precinct Areas. Topsoils are generally expected to have better structural stability, but subsoils have the potential to be highly sodic/dispersive and susceptible to erosion, particularly in instances where the topsoil is removed or if there are drainage works, which then result in rainfall and runoff contacting and eroding these soils."

5.7.12 Summary

The report notes that with the proposed urban development there will be a significant change in runoff to waterways which in turn will heighten erosion risks. It will therefore be important to manage erosion risks and provide appropriately protection to waterways, including any swamps that are present in the GAEP area. As noted, *"Development in these areas will require very careful planning, staging of works to minimize disturbance, and possible remediation of soils to enhance their stability."*

With reference to GAEP North (West of Pousties Road), we note that there are no "waterways, including any swamps" within this area as compared to those arising within GAEP West.

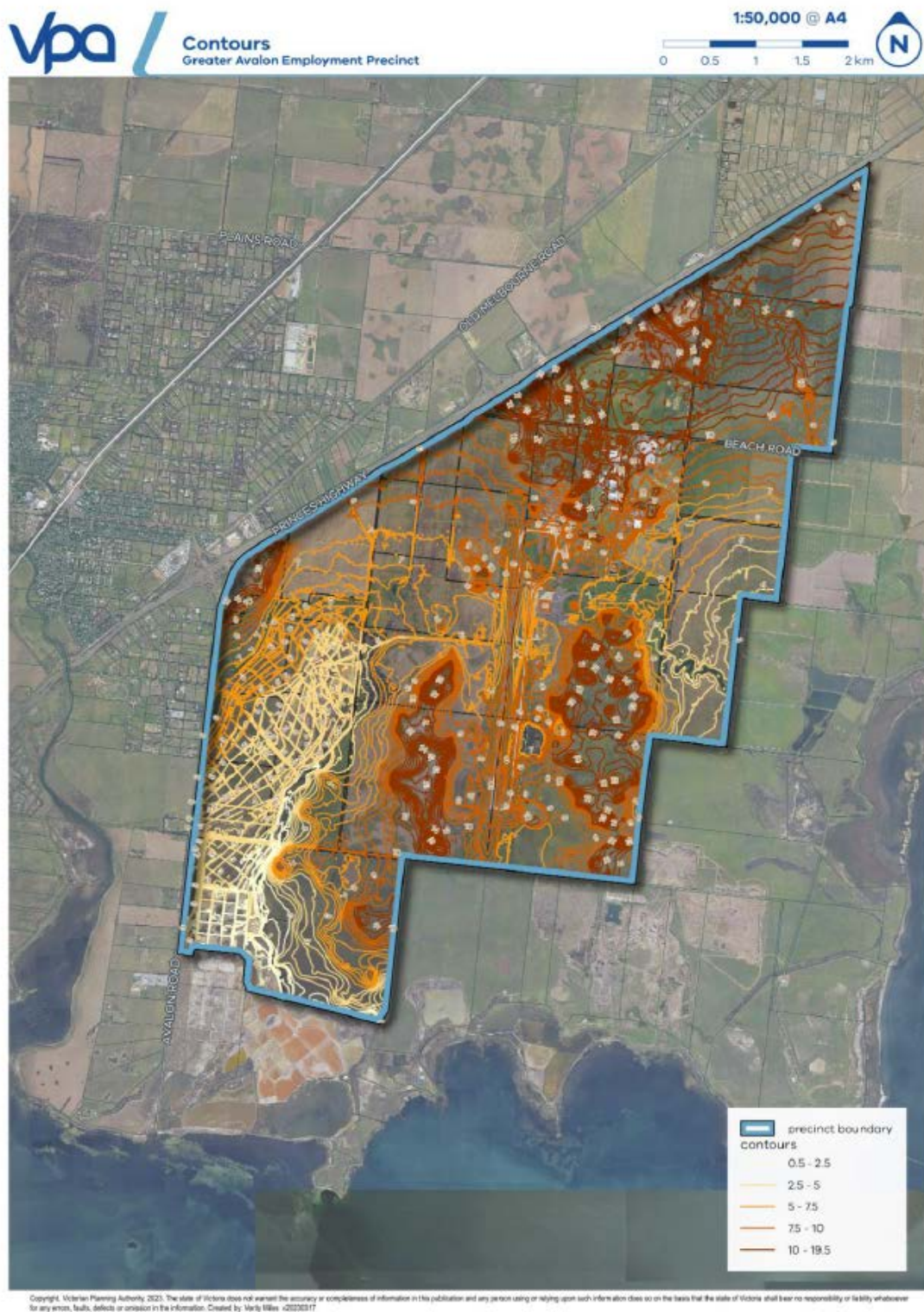


Figure 9: VPA Contour Plan

5.8 Infrastructure

We have reviewed the following document:

- *Spiire / Utility Assessment Report / Greater Avalon Employment Precinct / Prepared for: Victorian Planning Authority / November 2025.*



5.8.1 Service Infrastructure

With reference to the overall GAEP comprising both GAEP North and GAEP West, the report states as follows regarding infrastructure servicing:

“The precinct has access to existing sewer reticulation, potable water supply, electricity supply, gas supply and telecommunications network infrastructure, but it is clear that the authorities need to further develop their overall strategies and plans for the provision of increased service to this area”.

With reference to the staging of development within the overall GAEP, the report states as follows:

“The logical staging of development would be to commence near either the Beach Road or Avalon Road interchanges with the Princes Highway, as they are the closest proximity to the existing infrastructure to connect to and begin expanding from.”

“This report has assessed the availability and requirements for the provision of the following service infrastructure required within the Greater Avalon Employment Precinct:

- *Sewer reticulation.*
- *Potable water supply.*
- *Electricity supply.*
- *Gas supply.*
- *Telecommunications network.”*

The report notes that the overall GAEP has access to the above existing infrastructure, but that the relevant authorities need to further develop their overall strategies and plans for the provision of increased service to this area as the GAEP is developed.

With reference to the siting of new infrastructure the report notes that the *“location of trunk service infrastructure should be cognisant of environmental factors such as minimising impact to areas of high ecological value and significant vegetation for retention.”*

5.8.2 Summary

Significantly, the Spiire report notes ***“that the logical staging of development would be to commence near either the Beach Road or Avalon Road interchanges with the Princes Highway, as they are the closest proximity to the existing infrastructure to connect to and begin expanding from.”***

“Timing of infrastructure will generally be dependent on the timing of application for staged development within the area. Should applications be “out of sequence” authorities have the ability to provide infrastructure, potentially with additional bring forward charges past on the development applicant.

Costs associated with the provision of infrastructure will generally be borne by the developer, with larger trunk infrastructure being funded under the relevant authority’s capital works programs.

*Developing proponents will be required to deliver drainage and road infrastructure in line with requirements of the Development Play Overlay (DPO) for GAEP West and would be subject to a Section 173 Agreement with relevant responsible authorities. **The infrastructure requirements for GAEP North will be further investigated as per planning policy proposed in the planning scheme amendment.”***

The land within GAEP North (West of Pousties Road) is controlled by four aligned landowners only, all of whom are funders to the original GAEP “fast track” PSP and all of whom seek to have



their land rezoned.

The land is level throughout with an extensive history of agricultural use and with little or no constraints to both the enhancement of existing infrastructure and in turn the land ultimate redevelopment.

The land is “shovel ready” and located on the front door of Victoria’s second international airport and with direct frontage to Victoria’s busiest road, the Princes Freeway.

The further investigation into the infrastructure requirements for GAEP North (West of Pousties Road) as outlined in the above report makes no sense and is illogical when compared to the issues facing GAEP West. The application of a DPO to facilitate the rezoning of GAEP North (West of Pousties Road) to deliver drainage and road infrastructure similar to that being proposed for GAEP West is entirely appropriate.

The ongoing use of the GAEP North (West of Pousties Road) for primary production is completely out of step with its location proximate to all necessary infrastructure. Its immediate rezoning is consistent with not only the recommendations of the Spiire Report but the aspirations of the Avalon Airport and the intent of State Government policy.

5.9 Background Report

We have reviewed the following documents:

Victorian Planning Authority / Background Report / Greater Avalon Employment Precinct / Wadawurrung Country/ November 2025.

The Background Report as prepared by the VPA states that “following a review of the VPA’s Housing Statement “priority planning projects for growing suburbs”, an alternative planning pathway was identified for GAEP. The project now involves the preparation of a framework plan for the whole precinct, and the application of the Development Plan Overlay to GAEP West. Both precincts must address the following matters of state interest:

- Safeguarding of Avalon Airport and ensuring future development is compatible with the airport’s operations.*
- The capacity of state transport infrastructure and the need for any upgrades.*
- Protection of environmental and biodiversity values, including native grassland and habitat for threatened species such as the Victorian Grassland Earless Dragon.*
- Protection of Ramsar wetlands, coastal saltmarsh, and the Western Treatment Plant from stormwater runoff from proposed development areas.”*

Section 1.4.4 of the report references drainage. Within this section the VPA states that drainage for the GAEP North is more complex because it drains into the Western Treatment plant triggering additional EPA and WTP approval processes.

In that same section, the VPA acknowledges that the HARC work demonstrates that while the drainage challenges identified by Alluvium are real and significant in GAEP West, they are not prohibitive to development. It is unclear why the additional complexity of the WTP would justify a different conclusion for GAEP North (West of Pousties Road).

In section 1.4.6 on the discussion of biodiversity and vegetation, the report is very light on the Northern Precinct, understandably so given the relative scarcity of biodiversity values within GAEP North as compared to GAEP West.

In section 3.1, the strategic reasoning for precinct staging is so set out.

In terms of the staging of transport infrastructure, there is nothing in there that would, in our



opinion, support the decision made in relation to the Northern Precinct. There is nothing to indicate that an assessment has been made on the basis of the existing capacity and what volume of traffic could be sustained before that existing capacity creates transport issues.

Under the heading of “Land Supply”, the report refers to the SGS work, noting that the modelling shows that by taking a *“staged approach the precinct will provide industrial land to the 2080s...”*. It also makes the point that, *“...a staged approach would enable development to be coordinated with infrastructure provision...”* but it does not in that section explicitly endorse the north coming online in 2056.

In relation to drainage, it summarises points previously made.

In relation to biodiversity, it refers to the fact that access was not available to a couple of properties in the North Precinct which of course are properties to the east of Pousties Road.

Finally, before the section on biodiversity, it makes the following statement under staging for GAEP North, *“The Framework Plan includes staging criteria, ensuring GAEP North only proceeds on the basis of the “Beach Road interchange being upgraded to provide additional capacity to meet the needs of Avalon Airport, and that any necessary additional freeway and interchange capacity is available or can be constructed”. This prevents the precinct from constraining the airport’s growth trajectory.”* Nowhere though, have we been able to find what, in fact, the capacity of the interchange is and how much of that is being used up and what are the projected uses moving forward given airport and Point Wilson operations.

Section 4.1.1 is a critical section which looks at the staging criteria for GAEP North that must be met before the land can be rezoned and they are concerning. We set them out below for the sake of convenience:

1. *Beach Road interchange upgraded to provide additional capacity for Avalon Airport, with any necessary additional freeway/interchange capacity available or able to be constructed;*
2. *Confidence in ability to deliver a drainage development service scheme including obtaining relevant environmental approvals under state and federal legislation;*
3. *Arrangements in place to construct utility infrastructure to service GAEP North;*
4. *Strategic justification demonstrating need for additional employment land to contribute to regional supply;*
5. *Preparation of a Precinct Structure Plan or other suitable strategic plan.*

This application of an unsubstantiated and unwarranted staged approach allows GAEP West to proceed immediately while ensuring GAEP North, inclusive of the land west of Pousties Road, only develops when supporting infrastructure is ready and the need for additional employment land is demonstrated.



6. Our Approach to Rezoning GAEP North (West of Pousties Road)

In summary, our submission supports why our clients' landholdings should be treated in the same way as it is proposed for the GAEP (West).

As what has been put out on consultation is a draft amendment proposal, as a matter of process, in our opinion, the Minister can authorise an amendment for GAEP North (West of Pousties Road) which reflects what is proposed for the West Precinct.

Fundamental to this is the concept that the GAEP North Precinct should be split into two stages with the landholdings in GAEP North (West of Pousties Road) treated in the same manner from a planning strategy perspective as GAEP West.

Further, the landholdings to the east of Pousties Road should be designated in the Framework Plan as "subject of further investigation" accepting that, for example, in relation to biodiversity and drainage there are matters relating to the landholdings east of Pousties Road that simply do not arise for consideration in relation to the landholdings west of Pousties Road.

The planning controls that have been placed on consultation as part of the draft amendment for the GAEP West can easily be adapted to apply to GAEP North (West of Pousties Road). Indeed, we have attached a marked-up version of both the Development Plan Overlay and the Design and Development Overlay proposed for GAEP West, adapting them to apply to GAEP North (West of Pousties Road) only.

The Development Plan Overlay and the Design and Development Overlay we propose for GAEP North (West of Pousties Road) are provided at **Appendix E**.

We have also attached an amended policy, again marked up to reflect the proposal being advanced on behalf of our clients at **Appendix F**.

A Site Specific Control Overlay (SCO) proposed to apply to all landholdings within GAEP North (West of Pousties Road) is provided at **Appendix G**.

The new document, (the SCO) is a site-specific control to apply to all landholdings within GAEP North (West of Pousties Road).

We have received advice from Ratio Consultants to assist our understanding of traffic issues within North Precinct and we understand that there is considerable existing capacity in the Beach Road interchange and with relatively minor upgrades to the road transport infrastructure that capacity can increase from presently estimated at 12,000 vehicles per day to 18,000 vehicles per day.

On the basis of the advice received, the current traffic volumes at the interchange are nowhere near those capacity levels and accordingly even allowing for increase in traffic associated with Avalon Airport, there is likely to be unused capacity in that interchange for some years to come. It makes no sense for the existing capacity not to be utilised.

There have been discussions between our clients and the operators of the Avalon Airport and they do not oppose, in fact, they support the rezoning of our clients' land at this point in time and not at some indeterminate time into the future.

What the newly proposed site specific control does is make it absolutely clear that the capacity in the Beach Road interchange as a matter of priority is for the benefit of Avalon Airport but provides an opportunity through the submission of a Transport Impact Assessment to be approved by the responsible authority and Head Transport for Victoria to be utilised as part of the development of GAEP North (West of Pousties Road).



Insofar as the issue of drainage is concerned, it is clear from the documentation that has been placed upon consultation that notwithstanding the complexity (a description given by HARC) in the drainage infrastructure solution for the GAEP West, a rezoning is proposed for GAEP West notwithstanding those complexities.

Our clients have no issue with that and in fact, it is the position that they have been advancing in relation to the GAEP North (West of Pousties Road) and they see no reason why the drainage matter cannot be advanced in the same way for GAEP North (West of Pousties Road) as it is proposed for GAEP West. We trust Melbourne Water is comfortable to proceed in the same way that the VPA, CCMA and the CoGG are prepared to proceed in relation to GAEP West.

7. Conclusion

What is currently proposed via the draft Amendment C447ggee is a Framework Plan which will do nothing more than identify our clients' land as suitable to transition from a Farming Zone to an Employment Zone. The associated policy proposes unwarranted trigger points and timeframes which must be achieved before any rezoning can be advanced.

This process provides no certainty to the landowners because they do not control the rezoning process and cannot appeal either a failure or refusal of the government to instigate a rezoning of their land. This form of planning outcome falls significantly short of the "Fast Track" PSP 2.0 approvals process that our clients funded and commenced in early 2023 with the expectation as provided by the VPA that a rezoning be achieved within 24 months (2 years).

As noted at the outset, the GAEP is a priority precinct for the State of Victoria to transition from its current Farming Zone to an Employment Zone. The introduction of a Framework Plan and a policy does nothing to advance the high priority currently given to the precinct.

Our preferred position is as follows:

- That the rezoning for both precincts comprising GAEP West and GAEP North (West of Pousties Road) proceed concurrently on the basis that a drainage strategy to the satisfaction of the relevant drainage authority must be in place before any development within either precinct can occur.

If our preferred position as outlined above is unable to be achieved then our alternate position is as follows:

- The rezoning of the GAEP North (West of Pousties Road) be split to comprise Amendment C477ggee Part 2 and proceed in a timeframe consistent with the completion of the Melbourne Water drainage work; and
- A directive be provided to Melbourne Water instructing them to complete the drainage work that it says is incomplete as a matter of priority within a specified and agreed timeframe.

We are sure that in the same way that solutions have or will be found for the GAEP West precinct where the issues are the same and potentially greater from a stormwater quality and flooding perspective, solutions will be found for the northern precinct and certainly that part of the precinct that sits within GAEP North (West of Pousties Road). This will ensure a consistent and transparent process and outcome for both the western and northern precincts.

GAEP North (West of Pousties Road) is "shovel ready" and located on the front door of Victoria's second international airport and with direct frontage to Victoria's busiest road, the Princes Freeway. Our clients request to be heard before the Standing Advisory Committee, orally and in writing, to present submissions and evidence in support of their position.

Appendices



Appendix **A**

Avalon 2020 Certificates of Title



Appendix B

Avalon Lodge Certificate of Title



Appendix C

Letter from EPA dated 18 April 2023

18 April 2023

VIVA ENERGY AUSTRALIA PTY LTD

Level 16, 720 Bourke Street,

DOCKLANDS, VIC 3008



Our Ref: REV-90001012

By email: [REDACTED]

Dear [REDACTED]

Re: Revocation of: Clean up Notice 90001012, Princes Highway, Lara, Victoria 3212 (WOPL)

This letter confirms that Clean up Notice 90001012 is revoked as of 18 April 2023.

Reason for revocation:

- Compliance has been achieved

On 1 July 2021 the *Environment Protection Act 2017* (the new Act) came into effect replacing the *Environment Protection Act 1970* (the old Act). The general environmental duty (GED) is at the centre of the *Environment Protection Act 2017* and it applies to all Victorians.

You must continue reduce the risk of harm from your activities:

- to human health and the environment
- from pollution or waste.

This means the approach to protection of human health and the environment has changed. The expectation is that you will manage your activities to avoid the risk of environmental damage. You must also respond if pollution does occur. If you have any questions in relation to your obligations, please contact EPA at contact@epa.vic.gov.au or 1300 EPA VIC

Yours sincerely,

[REDACTED]

[REDACTED]

EPA Authorised Officer
SEPO Contaminated Land and Landfill
South West Victoria Region
Environment Protection Authority Victoria



Appendix D

Avalon City Certificate of Title



Appendix E

Development Plan Overlay and the Design and Development
Overlay proposed for GAEP North (West of Pousties Road)

Proposed
C477ggee**SCHEDULE ~~50~~ TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY**Shown on the planning scheme map as **DPO~~50~~**.**GREATER AVALON EMPLOYMENT PRECINCT NORTH (WEST OF POUSTIES ROAD)~~WEST~~****1.0****Objectives**Proposed
C477ggee

To facilitate the coordinated sustainable development of the Greater Avalon Employment Precinct North~~West~~.

To ensure development does not prejudice or conflict with the ongoing operation of the Avalon Airport ~~and provides an appropriate interface to sensitive uses outside of the development area.~~

To ensure development does not adversely impact existing Ramsar Wetlands ~~to the south, Avalon Coastal Reserve~~ and existing biodiversity values within the development area.

To facilitate a high amenity precinct supported by ancillary services, and a high-quality open space network for workers and visitors.

2.0**Requirement before a permit is granted**Proposed
C477ggee

A permit may be granted to subdivide land or construct a building or carry out works before a development plan has been prepared to the satisfaction of the responsible authority, for the following:

- Subdivision of the land to realign property boundaries, or create a road, or create or remove easements.
- Works required for physical infrastructure or utilities to service the land.
- Extensions or alterations to an existing building or works associated with an existing residential use.
- Extensions or alterations to an existing building or works associated with an existing use that will not prejudice the preparation of a development plan for the site.

Before granting a permit, the responsible authority must be satisfied that the permit will not prejudice:

- the preparation of a development plan; and
- the future use or development of the land in an integrated and orderly manner in accordance with Plan 1 to this schedule and the operation of the State transport system.

Infrastructure Contributions Agreement

Unless otherwise agreed to by the responsible authority, a permit must not be granted to subdivide or develop land until an agreement under Section 173 of the *Planning and Environment Act 1987* has been entered into between the owner of the land and the Greater Geelong City Council which specifies the nature and amount of any infrastructure contributions. The agreement must specify:

- Net developable area for each property.
- Development catchment areas (if applicable).
- Methodology of levies calculated.
- Infrastructure items to be included as shared infrastructure, including relevant triggers or staging based on advice of technical reports.
- Itemised costings of the shared infrastructure items.
- Responsible delivery agency of the shared infrastructure items.
- Details of the future ownership and management arrangements for any shared infrastructure items.
- Operational and administrative provisions.

The owner will pay all costs and expenses of, and incidental to, the execution and recording of the agreement.

Transport Infrastructure Contributions Agreement

Unless otherwise agreed to by the responsible authority and Head, Transport for Victoria, a permit must not be granted to subdivide or develop land until an agreement under Section 173 of the *Planning and Environment Act 1987* has been entered into between the owner of the land, the Greater Geelong City Council and the Head, Transport for Victoria, for the delivery by the developer and / or landowner, at its cost of Transport Infrastructure items between the Greater Avalon Employment Precinct ~~North West~~ and the external road network servicing the use and development.

The agreement must specify:

- The scope of work and location of infrastructure items required as a result of the development, including any land provision or acquisition.
- The expected timing of provision of each infrastructure item and who is responsible for delivery.
- The cost of any items that are the subject of financial contributions rather than direct delivery by the owner.
- The equitable apportionment of costs between the developer, Council and Head, Transport for Victoria for any items which exceed the needs of the development.
- Operational and administrative provisions.

The agreement will apply to the following infrastructure items:

- Upgrades to the ~~Avalon~~ Beach Road and Princes Freeway interchange.
- ~~*— Construction of a new intersection on Avalon Road to provide access into the Greater Avalon Employment Precinct.~~
- Any upgrades to ~~Beach~~Avalon Road to facilitate the increased traffic volumes associated with providing access into the Greater Avalon Employment Precinct.

The owner will pay all costs and expenses of, and incidental to, the execution and recording of the agreement.

3.0

Conditions and requirements for permits

Proposed
C477ggee

The following conditions and/or requirements apply to permits:

A permit must contain conditions or requirements which give effect to the provisions and requirements of an approved Development Plan.

Drainage and stormwater management

- A permit to subdivide land or to undertake works (other than vegetation removal) must include a condition that requires a stormwater management plan be prepared that implements the recommendations identified in the Integrated Water Management Plan (prepared under Clause 4.0 of this Schedule), to the satisfaction of the relevant drainage authority. The plan must include:
 - Consideration of the drainage requirements of any upstream and downstream landholders,
 - Any proposed works and their operational and maintenance arrangements,
 - An agreed schedule and cost apportionment for maintenance of drainage and water quality assets,
 - Assessment of the risks of adverse impact on receiving waters and environment with regard to stormwater volume and water quality,
 - Detailed civil construction plans,
 - Development of lots must be outside the 1% Annual Exceedance Probability (AEP) flood extent for riverine flooding and coastal flooding (with consideration for

climate change scenarios as recommended by the ~~Corangamite Catchment Management Authority~~ [Melbourne Water](#)).

Sodic and dispersive soil site management plan

- ~~▪ A permit to subdivide land or to undertake earthworks must include a condition that requires a site management plan to be prepared that implements the recommendations identified in the sodic and dispersive soil management plan, to the satisfaction of the responsible authority.~~

Construction environmental management plan

- A permit to subdivide land or to undertake earthworks must include a condition that requires a construction environmental management plan to ensure that fill, soil storage and earthworks do not contribute to erosion or cause silt/soil to enter waterways, and dust is managed. Areas to be nominated for storage and vehicle parking are not placed on or near areas nominated as waterways, conservation or open space reserves. It should include specific species/vegetation conservation strategies, daily monitoring, sedimentation management, site specific rehabilitation plans, weed and pathogen management methods. The construction environmental management plan must be prepared to the satisfaction of the responsible authority in consultation with Department of Energy, Environment and Climate Action.

Bushfire hazard site management plan

- A permit to subdivide land must include a condition requiring that prior to commencement of works on site, a Bushfire Hazard Site Management Plan must be submitted to and approved by the responsible authority. The Bushfire Hazard Site Management Plan must:
 - Address and implement any recommendations of the Bushfire Management Plan approved under Clause 4.0 of this schedule.
 - Identify the staging of development. Identify the management of any interim bushfire hazard setbacks and vegetation management.

Gas and oil pipelines

- A permit to subdivide land, construct a building or carry out works on land identified within or adjacent to ~~any~~ the high pressure gas pipeline must include a condition requiring that, prior to the commencement for works, the applicant address the interface treatment of the high pressure gas pipeline throughout the land.
- A permit to subdivide land, construct a building or carry out works on land identified within or adjacent to the measurement lengths of the Westernport Altona-Geelong Pipeline and Black Oil Pipeline, as shown in Plan 1, must include a condition requiring that, prior to the commencement for works, mitigation measures be implemented to safeguard the pipelines to the satisfaction of the Minister administering the *Pipelines Act 2005*.

Preliminary risk screen assessment

- ~~▪ A proposal to subdivide land or to use land for a sensitive use (child care centre or caretakers house), or construct or carry out buildings and works associated with this use, where the land is identified as having a potential risk for contamination in Table 1 must demonstrate the site is suitable by providing:~~
 - ~~— A preliminary risk screen assessment statement has been issued in accordance with the Environment Protection Act 2017 stating that an environmental audit is not required for the proposal; or~~
 - ~~— An environmental audit statement has been issued under Part 8.3 of the Environment Protection Act 2017 stating that the land is suitable for the proposal; or~~
 - ~~— A certificate of environmental audit for the land has been issued in accordance with Part IXD of the Environment Protection Act 1970; or~~
 - ~~— A statement of environmental audit for the land has been issued in accordance with Part IXD of the Environment Protection Act 1970 stating that the environmental conditions of the land are suitable for the proposal.~~

- ~~If an environmental audit statement under Part 8.3 of the Environment Protection Act 2017 has been issued stating that the land is suitable for the proposal, a condition must be included on the planning permit. The responsible authority may waive the requirement for a further preliminary risk screen assessment (or environment audit) where it has already been undertaken for the land, and where it is satisfied that the previous preliminary risk screen assessment (or environment audit) considered the relevant land uses.~~
- ~~This requirement does not apply to the construction or carrying out of buildings and works if:~~
 - ~~— The buildings and works are associated with an existing sensitive use (residential) included in Clause 62.02-1 or 62.02-2 and the soil is not disturbed.~~
 - ~~— The buildings and works are required by the Environment Protection Authority Victoria or an environmental auditor appointed under the Environment Protection Act 2017 to make the land suitable for use; or~~
 - ~~— The buildings and works are reasonably required by the environmental auditor appointed under the Environment Protection Act 2017 or the Environment Protection Act 1970 to undertake a preliminary risk screen assessment or environmental audit.~~

~~This application requirement does not apply to buildings and works associated with a residential use established before the approval date of Amendment C477ggee.~~

TABLE 1: PRELIMINARY RISK SCREEN ASSESSMENT

Address	Lot Number
25 Avalon Road, Avalon	Lot 1 LP76925
255-275 Avalon Road, Avalon	Lot 1,2,3-TP221328 and Lot 1-TP411602

- ~~Any permit to subdivide land, or to use land for a sensitive use (childcare centre or caretakers house), or to construct or carry out buildings and works associated with these uses where an environmental audit statement under Part 8.3 of the Environment Protection Act 2017 has been issued stating that the land is suitable for the use or proposed use subject to recommendations must include the following conditions:~~
 - ~~— The recommendations that relate to the use and development of the land must be complied with to the satisfaction of the responsible authority before the use or development commences; and~~
 - ~~— Written confirmation of compliance with any recommendations in the environmental audit statement must be provided by a suitably qualified environmental professional (with the costs borne by the applicant) to the satisfaction of the responsible authority. Compliance sign-off must be in accordance with any requirements in the environmental audit statement recommendations regarding verifications of works.~~

~~Where recommendations of the Environmental Audit Statement require significant ongoing maintenance and/or monitoring, the applicant must enter into an agreement with the responsible authority under section 173 of the *Planning and Environment Act 1987*. The section 173 agreement must be executed on the title of the relevant land prior to the grant of a permit to develop the land, unless otherwise agreed to by the responsible authority. The applicant must meet all costs associated with the drafting and execution of the agreement, including those incurred by the responsible authority.~~

Transport Infrastructure

An application for the use or development of land that will result in a leasable floor area of 5,000 or more square metres must include a response to matters identified in the Integrated Transport Management Plan, as set out in Clause 4.0 of this schedule.

4.0

Proposed
C477ggee

Requirements for development plan

The development plan must be generally in accordance with Plan 1 and be prepared to the satisfaction of the responsible authority and in consultation with the City of Greater Geelong, and include:

- A **site analysis plan** that identifies the key attributes and constraints of the land its context, the surrounding area and its relationship with existing and proposed uses on adjoining land which includes an accurate description of:
 - Topographical, landscape features and any other relevant elements, as informed by a feature and level survey.
 - Views to and from the site.
 - Provision of services to the land.
 - Flood mapping and analysis for all events up to and including the 1% AEP for climate change (including potential coastal inundation from sea level rise and combined effects of tides, storm surges, coastal processes and local conditions such as topography and geology) or as determined by the floodplain management authority.
 - Surrounding land uses and movement network.
 - Notable areas of Aboriginal cultural values, as informed by a Cultural Values Assessment.
 - Any other notable feature or characteristic of the site deemed necessary to provide a full analysis of the site.
- A **site master plan** that includes:
 - ~~Land uses that reflect the land uses and interface area shown in Plan 1.~~
 - An open space network that where feasible provides for the retention of high and moderate value trees (as identified in *Arboricultural Assessment and Report (Tree Logic, September 2023)* and the retention of native vegetation consistent with Greater Avalon Employment ~~North West~~ Native Vegetation Precinct Plan.
 - A concept plan with indicative locations of key roads, drainage reserves, habitat conservation areas/reserves, distribution of land uses and interface treatments.
 - An indicative movement network, including public and active transport, bus stop locations, road layout, and any intersection treatments required (as determined by a Traffic Impact Assessment).
 - Cross-section details of roads.
 - Details of the extent and location of cut and fill to occur across the site, including site levels.
 - Proposed design responses at key interfaces and along key view lines.
 - Details of how walking and cycling infrastructure integrates with the surrounding existing and planned active transport network.
 - Provision for integrated water management, consistent with the Integrated Water Management Plan recommendations.
 - Provision for stormwater and drainage management, consistent with the Drainage and Stormwater Management Strategy.
 - Any necessary infrastructure required to service the development, including any water sensitive urban design measures.
 - Buffer areas and procedures to protect any areas of Aboriginal cultural values in accordance with the recommendations of a Cultural Values Assessment.

- Identification of bushfire hazard areas and relevant setbacks.
- ~~— Provisions for land to be set aside for a Victoria State Emergency Services facility and a fire services facility generally in accordance with the locations shown in Plan 1.~~
- Any recommendations or requirements in the Avalon Airport Impact Assessment Report prepared under this schedule and including but not limited to:
 - The configuration of any Protected Airspace applicable to the environs of the Avalon Airport, consistent with the Avalon Airport Impact Assessment Report.
 - Recommended maximum heights for buildings and landscaping located within Protected Airspace as it extends to ground level, to ensure the obstacle limitation surface (OLS) and Procedures for Air Navigational Services – Aircraft Operations (PANS-OPS) is not penetrated, as recommended in the Avalon Airport Impact Assessment Report.
- A staging plan of the subdivision, buildings and works.
- An **Environment Protection and Biodiversity Conservation Report** that shows how the proposal meets any commonwealth conditions stipulated in an approval under the *Environment Protection and Biodiversity Conservation Act 1999* including how those conditions will continue to be met over the long term with regard to climate change and degradation of assets over time which should inform the maintenance schedule.
- A **Site Servicing Report** that addresses the infrastructure and utilities servicing requirements for the precinct. Where the need for above-ground utilities (such as electricity substations, sewer pump stations, telecommunications facilities and overhead powerlines) is identified, the report must provide indicative locations for these to inform the future subdivision layout.
- An **Avalon Airport Impact Assessment Report** prepared in consultation with the Avalon Airport, having regard to the National Airports Safeguarding Framework, and associated guidelines, and the Avalon Airport Master Plan 2015 (or any superseding master plan). Any recommendations or requirements of this assessment must be incorporated into the development plan, with particular emphasis on:
 - any recommendations required for wildlife strike management,
 - ensuring airport safety is prioritised, including no negative impacts to the runway operations,
 - any recommendations required to ensure buildings and works do not conflict with the Obstacle Limitations Surface (OLS) and Procedures for Air Navigational Services Aircraft Operations (PANs OPS) guidelines.
- An **Integrated Water Management Plan** prepared to the satisfaction of the responsible authority and ~~Melbourne Water~~ **Corangamite Catchment Management Authority** and in consultation with, Parks Victoria, Barwon Water, the Department of Energy, Environment and Climate Action and City of Greater Geelong that includes:
 - A concept design for an integrated water management system, with particular emphasis on:
 - The treatment, discharge, storage and reuse of stormwater (as per the Drainage and Stormwater Management Strategy).
 - The potential to store, treat and reuse wastewater.
 - The approach to offsetting the use of potable water.
 - Considerations of the full water cycle and merits of possible options.
 - Future ownership and responsibility for the long term maintenance and management of stormwater and wastewater storage and reuse infrastructure.
 - Details of how the harvesting and reuse of stormwater and treated wastewater will be appropriately managed, as required by the relevant authority.

- Appropriate links to the Drainage and Stormwater Management Strategy.
- **A Drainage and Stormwater Management Strategy**, prepared to the satisfaction of [Melbourne Water](#) ~~Corangamite Catchment Management Authority~~ and Greater Geelong City Council and in consultation with Parks Victoria, Barwon Water and the Department of Energy, Environment and Climate Action that includes:
 - A concept design for an integrated water management system, with particular emphasis on:
 - The treatment, discharge, storage and reuse of stormwater, including an approach to managing the impact of stormwater on the ecological needs of the onsite and downstream receiving environment.
 - Details of any stormwater detention basins, including the location, asset reserve area, sections, and approximate volume and surface area.
 - Location of stormwater discharge points (outfall) including determination of the appropriate discharge quantity and water quality treatment requirements to manage the risk of adverse impact on environmental values to ~~the Avalon Coastal Reserve~~, Hovells Creek and Ramsar site.
 - Management of upstream flows to maintain the hydrological regime in the existing watercourse.
 - Consideration of the priority areas volume reduction as contained in the *Urban Stormwater Management Guidance* (Environment Protection Authority, 2021).
 - The impacts of sea level rise and climate change.
 - A drainage management strategy section that includes consideration of:
 - A slope analysis and direction of major and minor overland flowpaths, including consideration of any future earthworks on the site.
 - The agreed points of discharge/s for the site for major and minor drainage and the approach to manage or convey existing upstream flows.
 - Integration of drainage works with upstream and downstream land, including any required maintenance plan.
 - A Flood Impact and Risk Assessment to the satisfaction of the ~~Corangamite Catchment Management Authority~~ [Melbourne Water](#) and the Greater Geelong City Council that includes flood mapping and analysis for all events up to and including the 1% AEP under future climate change.
 - Detailed investigation and risk assessment of the impact of the proposed works on environmental values of the receiving waters, ~~Avalon Coastal Reserve~~ and Ramsar wetland values, particularly seagrass. This should include consideration of the advice in the *Environmental Reference Standard for Geelong Arm and the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site Management Plan Summary* (Department of Environment, Land, Water and Planning, 2018 and future climate conditions).
 - Details on the existing freshwater flow regime and modelling to demonstrate that any proposed onsite system will provide adequate protection of downstream values ~~and maintain the existing freshwater flows to the Avalon Coastal Reserve.~~
 - Details of any storage basins associated with the harvesting and reuse of stormwater, including the location, sections, and approximate volume and surface area.
 - Water sensitive urban design (WSUD) stormwater management measures to maintain water quality and environmental flows.
 - Future ownership and responsibility for the long term maintenance and management of stormwater and reuse infrastructure.
 - Demonstration of how a future drainage scheme considers the requirements of the ~~Avalon Coastal Reserve~~ [Melbourne Water Western Treatment Plan](#) and has no adverse impact on existing Ramsar wetlands

- Management of birdstrike risk on Avalon Airport operations associated with stormwater quality treatment measures, particularly those that utilise permanent standing water.
- ~~— Details of the upstream freshwater flows versus the coastal influence of Port Phillip Bay on the existing waterway along the western boundary (see Plan 1) which contains sensitive high value saltmarsh habitat so an appropriate water management regime can be implemented to retain and enhance this habitat.~~
- ~~— Details of the appropriate outfall location(s) for the site to minimise impacts on Ramsar values including avoiding impacts on the intertidal reefs within the Point Wilson / Limeburner's Bay. Site selection should be based on existing conditions at the selected locations as well as consideration of future climate conditions in which sea level rise may alter the values and change the hydrology conditions.~~
- Details of the existing waterway values including the values associated with the different channels and how the water management regime will maintain these values.
- Details of groundwater levels and its salinity on the site and how the potential impacts on drainage and stormwater assets and interaction with surface runoff will be managed.
- ~~— The plan must be guided by the Greater Avalon Employment Precinct – West Position Paper 03 by HARC, November 2025 and Existing Conditions Flood Modelling Report by Alluvium, 31 May 2024 and include reference to:

 - ~~— WSUD Engineering Procedures: Stormwater CSIRO Publishing 2005.~~
 - ~~— Clause 56.07 of the Greater Geelong Planning Scheme.~~
 - ~~— The Infrastructure Design Manual and associated Design Notes (City of Greater Geelong Design Notes).~~
 - ~~— Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site Management Plan.~~
 - ~~— The Avalon Coastal Reserve Conservation Action Plan, Parks Victoria (or subsequent version).~~
 - ~~— Environment Protection Authority guidelines for best practice sedimentation and pollution control measures for waterways and wetlands.~~~~
- ~~A Drainage and Conservation Area Asset Management Plan to the satisfaction of Greater Geelong City Council that includes details of drainage assets, including where these assets are proposed to be privately owned and managed.~~
- An **Integrated Transport Management Plan** prepared to the satisfaction of the responsible authority, Greater Geelong City Council and Head, Transport for Victoria and that includes:
 - An assessment of traffic generation and the impact on the adjoining road network, including consideration of impacts to the State transport system, Avalon Airport Master Plan 2015 (or subsequent version) and development of the [north-west](#) precinct.
 - Identification of any upgrade work required on the adjoining road network, including the State transport system, including the staging of any works.
 - Conceptual traffic access plans and cross-sections, showing all proposed new or upgraded intersections, crossovers and street frontages.
 - Identification of a bus capable road network including integration with the broader public transport network.
 - Identification of the active transport network including pedestrian and cycling links and access improvements including both internal and external connections
 - Consideration of operation of the road network during events such as the Avalon Airshow.
- A **Staging Plan** that includes:

- The proposed provision, staging and timing of the various development plan projects requirements including:
 - stormwater drainage works in accordance with the approved Drainage and Stormwater Strategy and Integrated Water Management Plan.
 - reticulated water, sewerage, gas and any other infrastructure, linked to stages of development.
 - road and intersection upgrades in accordance with the approved Integrated Transport Management Plan.
 - open space and conservation areas.
 - the identification of any agency or person responsible for provision of particular items of infrastructure.
 - the indicative development commencement location and direction of the development pattern across the precinct.
 - a provision that any out-of-sequence development can only be supported by negotiation and agreement between a developer and the impacted infrastructure providers and not impose unreasonable additional burden on infrastructure providers.

~~*— A **Geotechnical Report** including details of the fill to be placed on the site.~~

~~*— A precinct wide **Coastal Acid Sulfate Soil Management Plan (CASSMP)** be prepared by a suitably qualified and experienced practitioner, to the satisfaction of Greater Geelong City Council. Such a person is a professionally accredited soil scientist or a person with five or more years recognised experience in acid sulfate soil assessment and management. The CASSMP should include:~~

- ~~— An overview of the physical characteristics and environmental attributes of the site.~~
- ~~— Detailed CASS mapping including the vertical and spatial distribution of CASS on-site and off-site with chemical testing results and interpretations.~~
- ~~— Overview of proposed works including detailed descriptions of any dewatering and drainage works, any soil excavations, delineation of geological lenses and horizons that may affect dewatering, plans for temporary above ground storage of CASS and plans for reuse/disposal of CASS.~~
- ~~— A description of the management strategies that will be used to minimise impacts from the oxidation of sulphides including the possibility of redesigning layout of the excavations to limit oxidation (e.g. avoid disturbing CASS materials, minimising disturbance to groundwater, trenchless technology), planned treatment (in situ or ex situ liming) and containment strategies of CASS and leachate, water table management.~~
- ~~— Details on how the planned management activities integrate with different components of the project including construction and other environmental management activities.~~
- ~~— Performance criteria for monitoring the effectiveness of the CASS management strategies during construction.~~
- ~~— Monitoring program which includes proposed location of monitoring points and frequency of monitoring, details of sampling and analytical parameters and details of procedures to be undertaken in the event that monitoring indicates that thresholds are being exceeded.~~
- ~~— Contingency procedures need to be developed as part of the CASSMP in order to manage impacts in the event of management strategies failure.~~
- ~~— The CASSMP should generally align with:~~

- the *Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils* (Victorian Government Department of Sustainability and Environment, October 2010); and
- the *National Acid Sulfate Soils Guidance* (Water Quality Australia, 2018).
- A precinct wide **Sodic and Dispersive Soils Assessment and Management Plan** prepared by a suitably qualified and experienced soil scientist, to the satisfaction of Greater Geelong City Council, that includes:
 - Assessment of existing site conditions (topsoils and sub-soils), including assessment of the extent of sodic and dispersive soils (including laboratory analysis of Exchangeable Sodium Percentage and soil dispersion). Sample locations should consider land gradient, erosion risk mapping, the extent of any existing erosion, landslip or other land degradation, potential surface water receptors and the proposed locations of surface water and stormwater features.
 - Assessment of soils collected from the soil profile, including from the anticipated depth of excavations/land disturbance.
 - Soil assessment at a sufficient frequency to distinguish areas of low sodicity risk (if any) from areas that will require sodicity management and/or further assessment.
 - Presentation of site specific data which links soil and landscape characteristics to the sodic soil risks and the potential for sub-surface erosion (sub-surface structure decline).
 - Risk Assessment. Identification and assessment of risks of sodic and dispersive soils to the environment from proposed development activities (including but not limited to surface water and buildings and structures).

If sodic soils are present, development of a Sodic and Dispersive Soils management plan is required including recommendations on:

- Planning approaches to minimise disturbance and/or risks from sodic soils at the precinct scale, with consideration of:
 - Proposed staging of the precinct,
 - Soil management practices (including fill) with consideration of anticipated sodic and dispersive soil exposure,
 - Potential need for baseline assessment (i.e. baseline turbidity) of surface water features (where risk assessment indicates potential for impact to surface water features);
 - Potential need for further soil assessment.
- Management and mitigation measures for potential erosion and dispersion risks.
- Management of drainage (interim and permanent) during all stages of development (including run-off).
- Any post-construction monitoring and/or management requirements (soil and/or water).
- Potential need for soil treatment and amelioration.
- Any treatment of soil proposed to be reused onsite or removed from the site.
- Any training and supervisions processes proposed for construction contractors to ensure compliance with the sodic and dispersive soils management plan. Consider management requirements at the individual lot level which could be provided by the Greater Geelong City Council to inform landowners if their site contains potential sodic soils and outline their responsibilities for minimising disturbance and implementing mitigation measures.
- A **Bushfire Management Plan** prepared in consultation with the relevant fire authority and Greater Geelong City Council that achieves development that is bushfire

resilient for both the completed development and during any staging of the development. The Bushfire Management Plan must address the following requirements:

- The provision of a perimeter road on all interfaces with a permanent bushfire hazard.
 - Identification and mapping of setbacks from classified vegetation that will lead to exposure of radiant heat no greater than 12.5kW/m².
 - Recommendations for any vegetation management requirements to achieve acceptable level of defensible space.
 - Identify areas where the bushfire hazard requires specific bushfire management measures for subdivision and building works to be implemented (such as static water supply requirements and bushfire emergency management plans).
- A **Landscape Concept Plan**, prepared to the satisfaction of Greater Geelong City Council that includes:
- An overall landscape master plan for the land in the Development Plan.
 - A survey of existing vegetation to be retained and/or removed, including an arborist assessment for the identification and assessment of trees within the precinct including tree species, health, structure, estimated lifespan, amenity value, retention value, tree retention zones and anticipated mature height of all vegetation.
 - Details of any shared paths, bike paths or walking trails.
 - Details of likely impacts to native fauna resulting from the modification of land form and disturbance of surface soils and rocks.
 - Details of vegetation to be retained and recommendations for management and retention vegetation.
 - Details of how areas of biodiversity and conservation significance will be addressed including any proposed landscape buffers or treatments at the interface of the precinct and adjacent conservation areas.
 - Details of understory flora, tree and shrub species suitable for planting within any Protected Airspace as it extends to ground level area applicable to the environs of the Avalon Airport, such that the anticipated mature height of plants must not exceed the height of any applicable Protected Airspace. Trees and shrubs should be of local indigenous plant species relevant to the Ecological Vegetation Class (EVC) throughout the development area.
 - Details of how vegetation will be ecologically restored consistent with local EVC characteristics to include habitat features such as stags, sock or hollow logs,
 - Details of irrigation systems provided to service proposed plantings.
 - A written description of the management of all reserves, landscaping areas and water sensitive urban design treatments.
 - Details of the interface and buffer treatments between industrial uses and the conservation and open space areas and land set aside for drainage purposes.
 - An assessment of the impact of the landscaping concept on airport safety including instruction into Protected Airspace and details on whether the landscaping concept will attract more birdlife to the area.
- ~~A **Conservation Management Plan** prepared by a suitably qualified consultant and in consultation with the Department of Energy, Environment and Climate Action and Greater Geelong City Council outlining vegetation management, fencing and access and pest plant and animal management, inclusive of:~~
- ~~Identification of any areas to be retained outside of the Rural Conservation Zone. Measures for the long-term conservation, and maintenance and enhancement of native vegetation and habitat values within the precinct.~~

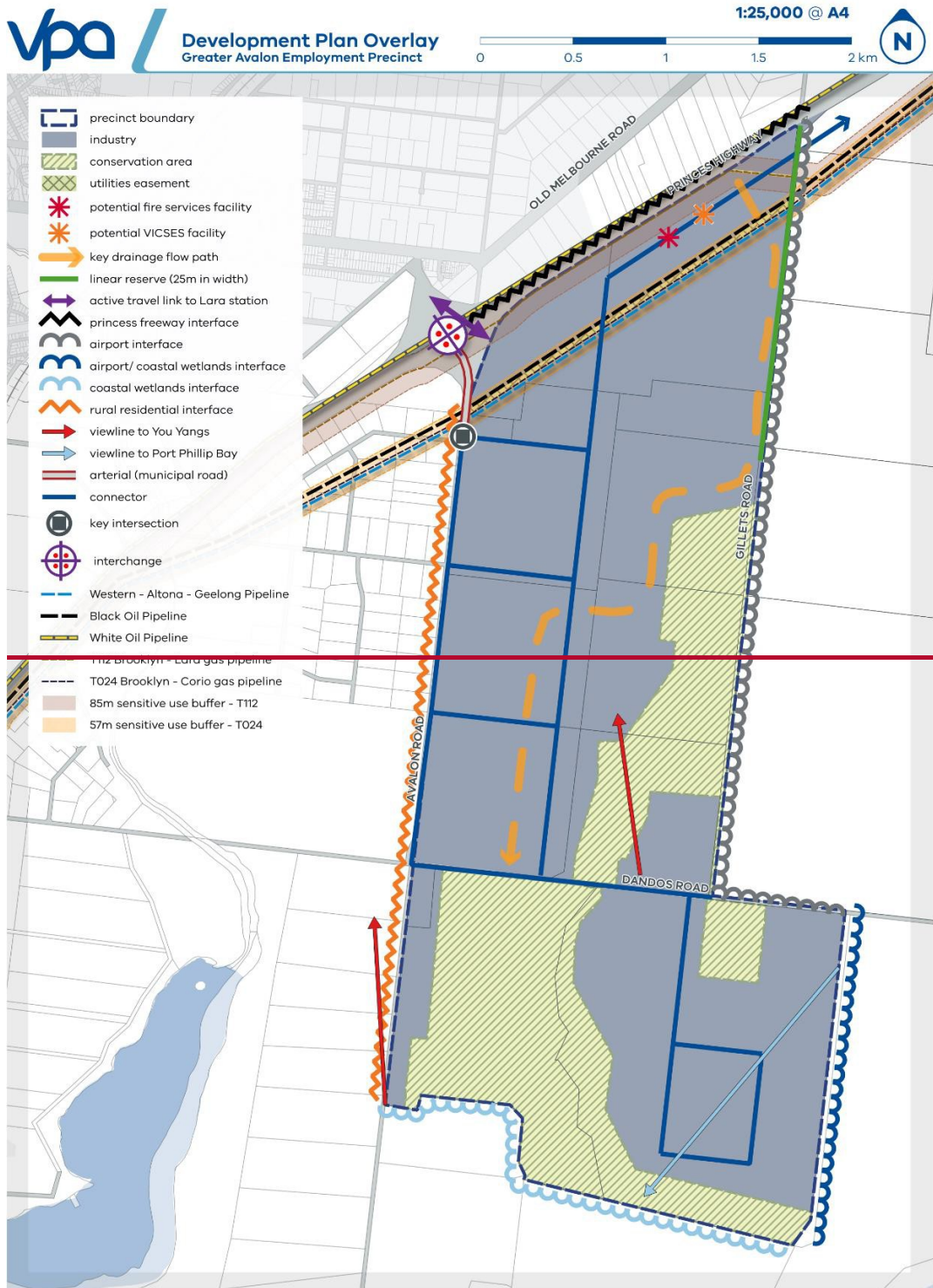
- ~~— Details on how management of the land is compatible with the long term conservation, and maintenance of native vegetation and habitat values within the precinct.~~
- ~~— The avoidance and minimisation of destruction of habitat for native fauna resulting from the modification of land form and disturbance of surface soils and rocks.~~
- ~~— Costing of conservation management plan, and a financial plan for execution of the conservation management plan.~~

- An **Environmentally Sustainable Development (ESD) Assessment** that includes:
 - An assessment of the nature of the proposed development, and the site conditions which present opportunities or constraints for achieving sustainable design outcomes.
 - A framework which identifies how the use and development of the land can achieve ESD outcomes in accordance with any relevant policies and strategies developed by the City of Greater Geelong and the Victorian Government.
- Details of how areas of Aboriginal cultural values, as informed by a Cultural Values Assessment, are addressed within the precinct.
- Design guidelines that address the *Greater Avalon Employment Precinct Landscape and Visual Impact Assessment Report*.
- Details of how the development will treat the interfaces and respond to the key view lines as identified on Plan 1 and in the *Greater Avalon Employment Precinct Landscape and Visual Impact Assessment Report*.
- Details of how all foreseeable threats to existing gas and / or liquid hydrocarbons transmission pipelines subject to the *Pipelines Act 2005* which may be affected by use and development of the precinct are identified and managed through protection measures in accordance with safety obligations of the *Australian Standard A2885 Pipelines – Gas and liquid petroleum*.
- Details of how all required existing and proposed utilities are provided for within the precinct and are consistent with the Site master plan and Landscape concept plan.
- Details of how the physical infrastructure meets City of Greater Geelong standards or if not defined, be subject to the approval of the responsible authority and be generally in accordance with the following:
 - *City of Greater Geelong Infrastructure Development Guidelines* (IDG) 2010.
 - *City of Greater Geelong adopted Infrastructure Design Manual* (IDM) 2010.

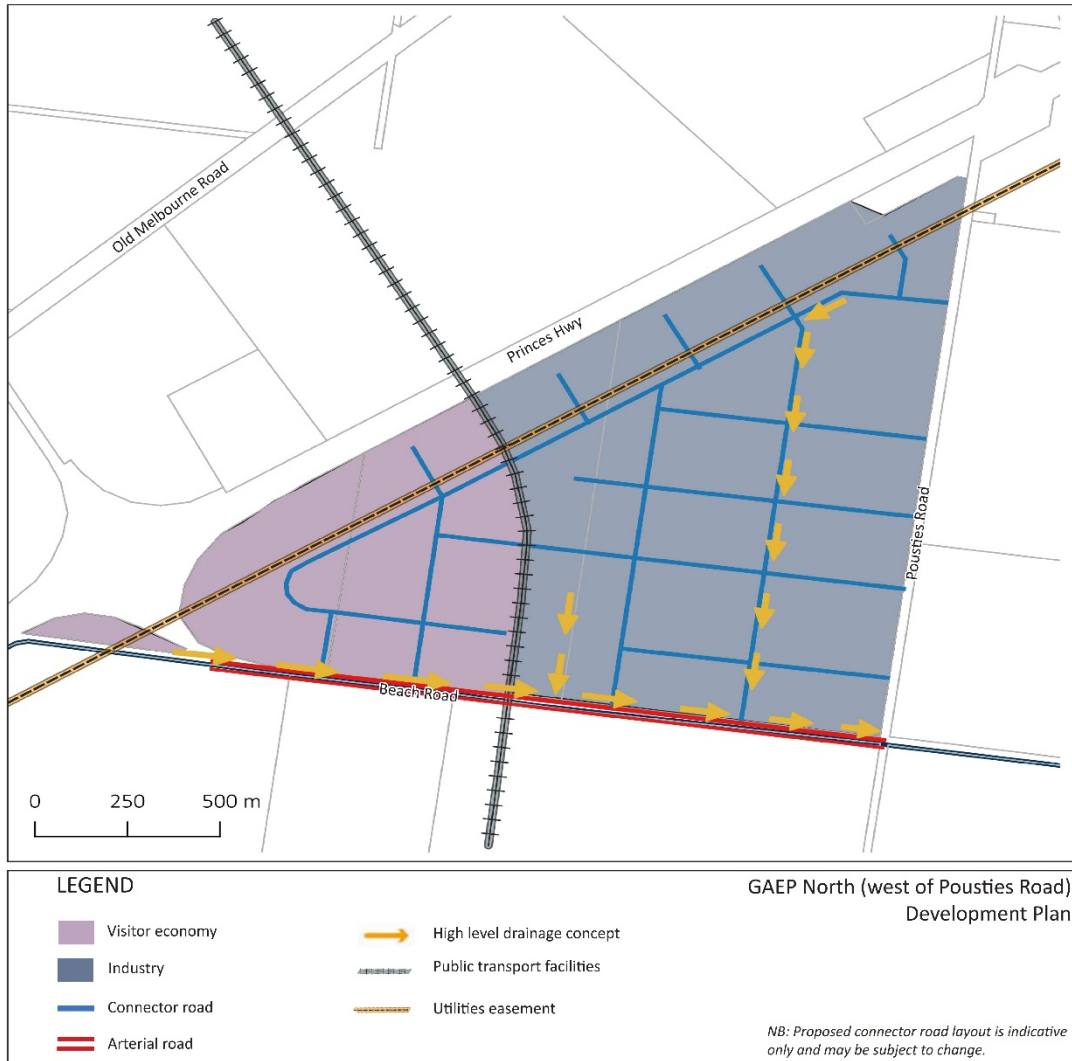
In deciding whether the Development Plan is satisfactory the responsible authority must consider the views of:

- Greater Geelong City Council
- Head, Transport for Victoria
- [Department of Energy, Environment and Climate Action](#)
- [Melbourne Water](#)
- ~~▪ [Corangamite Catchment Management Authority](#)~~
- Parks Victoria
- The relevant water, drainage and sewerage authority

Plan 1 – Greater Avalon Employment Precinct **West** **North** Concept Plan



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xx/xx/2025

SCHEDULE ~~53~~ TO CLAUSE 43.02 DESIGN AND DEVELOPMENT OVERLAY

Shown on the planning scheme map as **DDO53**.

GREATER AVALON EMPLOYMENT PRECINCT ~~NORTHWEST~~

1.0 Design objectives

xx/xx/2025

To facilitate the development of the Greater Avalon Employment Precinct ~~NorthWest~~ as a high amenity national, state and regionally significant industrial ~~and commercial~~ area suited to the needs of advanced manufacturing, freight, logistics, ~~and~~ production, support industries ~~and visitor economy land uses~~.

To ensure development provides a high level of visual amenity when viewed from major transport routes and surrounding non-industrial land uses.

To provide a high level of amenity for workers and visitors to industrial areas.

To promote best practice sustainable design including storm water quality and reuse measures.

2.0 Buildings and works

xx/xx/2025

A permit is required for a fence where the fence is located along a boundary that has a frontage to a street and is:

- Visually impermeable and greater than 1.5 metres in height above natural ground level; or
- Constructed of unpainted galvanised steel or uncoated wire.

Requirements

The following buildings and works requirements apply to construct a building or construct or carry out works.

Front and Side (fronting a street) Fences

Fences should be:

- Constructed of materials other than unpainted galvanised steel and wire;
- Constructed of materials that complement the building and surrounding area and painted a muted colour; and
- Screened by vegetation planting.

Site Layout and Design

Ensure front setback of new buildings are consistent with the setbacks of existing buildings in the area and set aside for landscaping and car parking.

Ensure the site layout, built form and location of any open space considers the protection of key view lines to prominent surrounding features such as the You Yangs and Port Phillip Bay.

Avoid potential conflict between pedestrian and vehicle movement through the design of the site, including provision of pedestrian links through car parking areas.

Provide physical infrastructure such as water, power, reticulated sewage and constructed sealed roads to new buildings.

Car Parking and Access

Provide car parking at the front of the site.

Ensure all vehicle crossings, accessways and parking areas are sealed with an all-weather coat.

Incorporate lighting to car parking areas where required.

Incorporate landscaped island beds if more than 10 car spaces are provided to separate the hard surface area and improve visual amenity.

Building Design

Design buildings to ensure:

- Buildings and works (including a television antenna and a flagpole) must not exceed the height of the most recent approved Obstacle Limitation Surface (OLS) or Procedures for Air Navigational Services - Aircraft Operations (PANS-OPS) surface prepared for an airport in accordance with the Commonwealth Airports (Protection of Airspace) Regulations 1996 or as shown in the Avalon Airport Masterplan.
- Buildings provide an appropriate response to any recommendation of a written aviation impact report required under clause 5.0 of this schedule.
- Buildings address the street frontage or open space area by including the following elements in the design:
 - Front facades that include design elements that add visual interest.
 - Locating office components in a visible location at the front of the building.
 - Incorporating facades that address both frontages where the site is located on a corner.
 - The location of office or showroom components on the side(s) of the building facing a street or open space area, or the incorporation of windows or articulation of the facade to avoid blank facades facing the public realm.
 - Clearly delineated visitor access points to the building.
- Buildings, works, plant and machinery are constructed, housed and maintained in a manner that minimises the visual impact.
- Larger buildings address bulk and massing through using a range of building materials, finishes and colours.
- High standards of design quality and building appearance in all locations, particularly on all lots that are directly adjacent to the Princes Freeway, Avalon Road, conservation reserves as well as wetland and coastal areas.
- A unified architectural treatment for the office and industrial parts of buildings, or designs that make an architectural feature of the office component and a neutral backdrop of the industrial component.
- Massing and articulation, window and door treatments, materials and colours to create attractive public facades which avoid unrelieved and/or blank facades facing street frontages.
- Use of low-maintenance external materials.
- Avoidance of highly reflective roof and wall materials.
- Avoidance of exposed plain concrete block walls.
- Integration of service equipment within the design of the building or its screening from view.
- Energy efficient building design and orientation.
- ~~Lighting in proximity to Avalon Road is designed to be baffled to prevent light spill and glare to dwellings on the west side of Avalon Road.~~

Landscaping

Retain existing vegetation where practical.

Provide landscaping:

- Within the front setback.
- Along boundaries which adjoin an ~~an sensitive land use or~~ environmental feature (such as creek or reserve) or where the site is visually prominent.
- ~~To assist in minimising headlight glare to the dwellings on the west side of Avalon Road where possible.~~

Ensure landscaping areas are:

- Designed to be low maintenance, including selection of hardy landscape species that require minimal ongoing maintenance and have low water usage. Where practical and consistent with this requirement, landscaping species should be locally indigenous or native; and
- Protected from vehicle damage by incorporating protective design features.

The quality and quantity of landscaping should reflect the scale of the building and car park area in order to address screening and softening of visual bulk.

Ensure any landscaping location and species selection will not encroach the protected airspace of Avalon Airport at mature height and will not attract wildlife relative to bird-strike risk.

Sustainable Design

Incorporate:

- Best practise storm water quality and reuse measures considered as part of the design for larger developments and on sites where it is practical to implement.
- To reduce the potential for contaminated runoff loading bays should be covered, active work areas should be contained internally within buildings and waste disposal areas should be appropriately located.
- Best practice Environmentally Sustainable Development provisions that encourage:
 - Measures that reduce the urban heat island effect.
 - Material re-use and recycling (use of materials with reduced embodied energy).
 - Renewable energy generation and battery storage.
 - Electric vehicle charging.

Exemption of notice and review

An application to construct a building or to construct or carry out works is exempt from the notice requirements of Section 52(1)(a), (b) and (d), the decision requirements of Section 64(1), (2) and (3) and the review rights of Section 82(1) of the Act.

3.0

xx/xx/2025

Subdivision

Requirements

Subdivision within the precinct should ensure:

- An appropriate range of lot types and settings.
- Lot configurations that facilitate energy efficient site and building design.
- ~~No lots have a rear aspect to the Princes Freeway, Avalon Road or conservation reserves.~~
- All lots are outside the 1% Annual Exceedance Probability flood event and have safe vehicular accessways provided to each lot where depth is no greater than or equal to 0.3 metres.
- A perimeter road is provided on all interfaces with a permanent bushfire hazard.
- A road network that complies with the relevant fire service requirements for emergency access and egress where appropriate.

Design of new local streets within the precinct should:

- Provide footpaths on both sides of every street.
- Provide generous street tree planting (clear-stemmed to 2 metres) in conformance with a consistent 'language' that reinforces the identity of the precinct and specific sub-precincts within it.
- Locate all services, including electricity supply, underground, wherever possible.
- Provide sufficient lighting to ensure pedestrian security.
- Use of lights that minimise glare.

4.0

Signs

xx/xx/2025

Sign requirements are at Clause 52.05 All land located within the Industrial 1 Zone is in Category 2. All other land is in Category [TBC4](#).

Requirement

Signage should be co-located on sites which have more than one tenant so as to avoid sign clutter.

5.0

Application requirements

xx/xx/2025

The following application requirements apply to an application for a permit under Clause 43.02, in addition to those specified elsewhere in the scheme and must accompany an application, as appropriate, to the satisfaction of the responsible authority:

- A written aviation impact report prepared by a suitably qualified person assessing the proposal against the National Airports Safeguarding Framework (NASF) Guidelines A to I inclusive and details of measures to respond to airport safeguarding risks and including:
 - A wildlife strike management assessment prepared by a suitably qualified person, demonstrating the impact of the proposal on wildlife strike risk and details of measures that respond to the findings and recommendations of the wildlife strike management assessment to prevent increased risk of wildlife strike.
 - A safety case prepared by a suitably qualified person, demonstrating the impact of the proposal on public safety risk at the end of runways and details of measures that respond to the findings and recommendations of the safety case to prevent increased risk to public safety at the end of runways.

6.0

Decision guidelines

xx/xx/2025

The following decision guidelines apply to an application for a permit under Clause 43.02, in addition to those specified in Clause 43.02 and elsewhere in the scheme which must be considered, as appropriate, by the responsible authority:

- The location and height of the proposed development with consideration of Avalon Airport's Obstacle Limitation Surfaces plan.
- The need to prevent buildings or structure and landscaping from being built which could interfere with and cause a safety hazard on aircraft operations such as height, lighting, built form layout, wind tunnels and bird strike impacts.
- City of Greater Geelong Sign Guidelines (February 2024).



Appendix F

Amended Policy associated with the GAEP Framework Plan

Greater Avalon Employment Precinct

Policy Application

This policy applies to land identified within the Greater Avalon Employment Precinct North and West areas as identified in the Greater Avalon Employment Precinct Framework Plan in this clause.

Objectives

To support the coordinated development of the Greater Avalon Employment Precinct as a significant employment precinct.

To ensure areas of high biodiversity and ecological value are protected.

Strategies

Direct land use, development and provision of infrastructure in accordance with the Greater Avalon Employment Precinct Framework Plan.

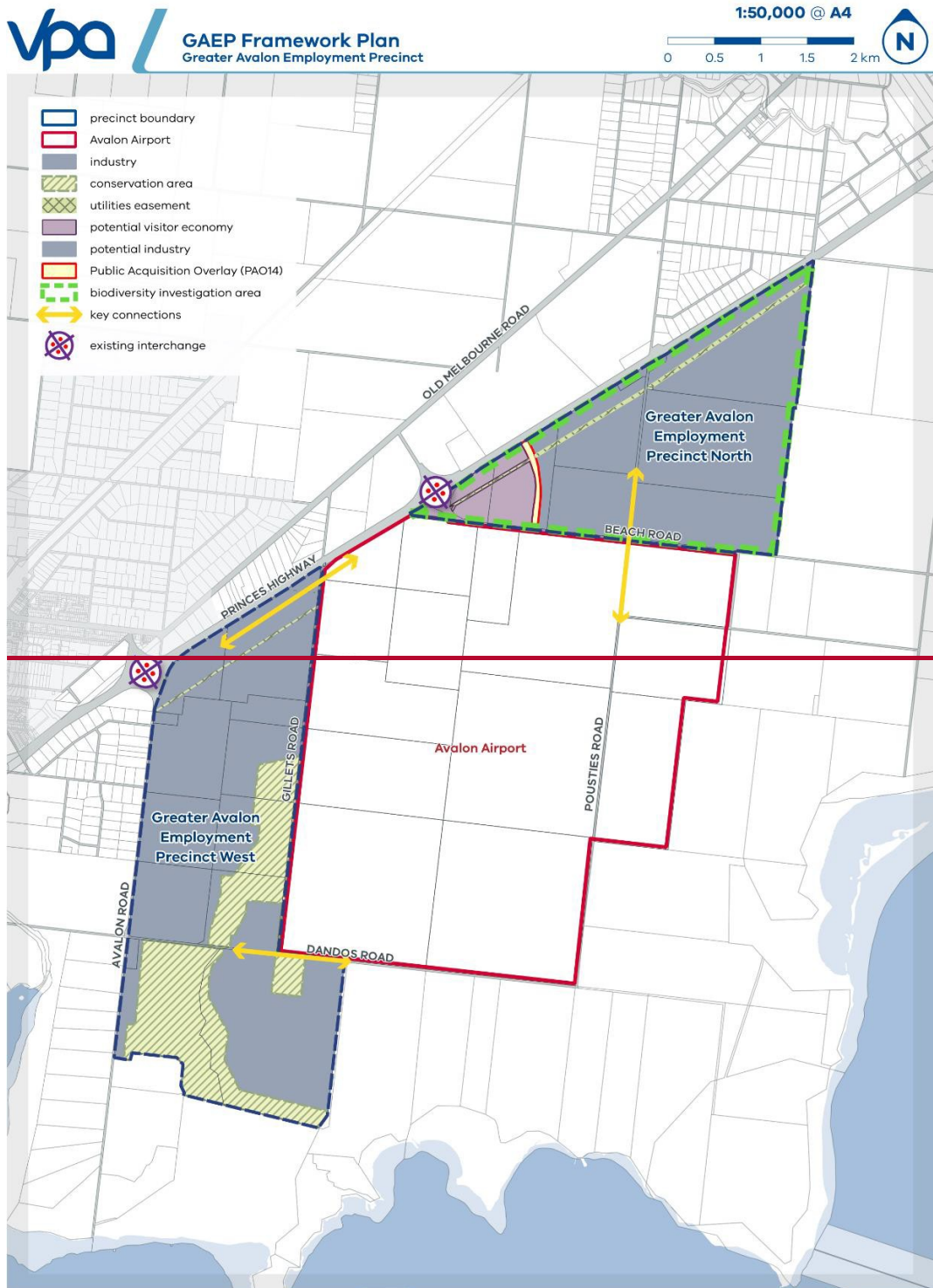
Support key industry sectors which complement Avalon Airport including freight and visitor economy ~~uses such as car hire, service stations, and accommodation~~ and development for retail and commercial uses.

Identify conservation areas to protect and enhance identified flora and fauna species and prevent off-site impacts to the Ramsar wetlands and Avalon Coastal Reserve.

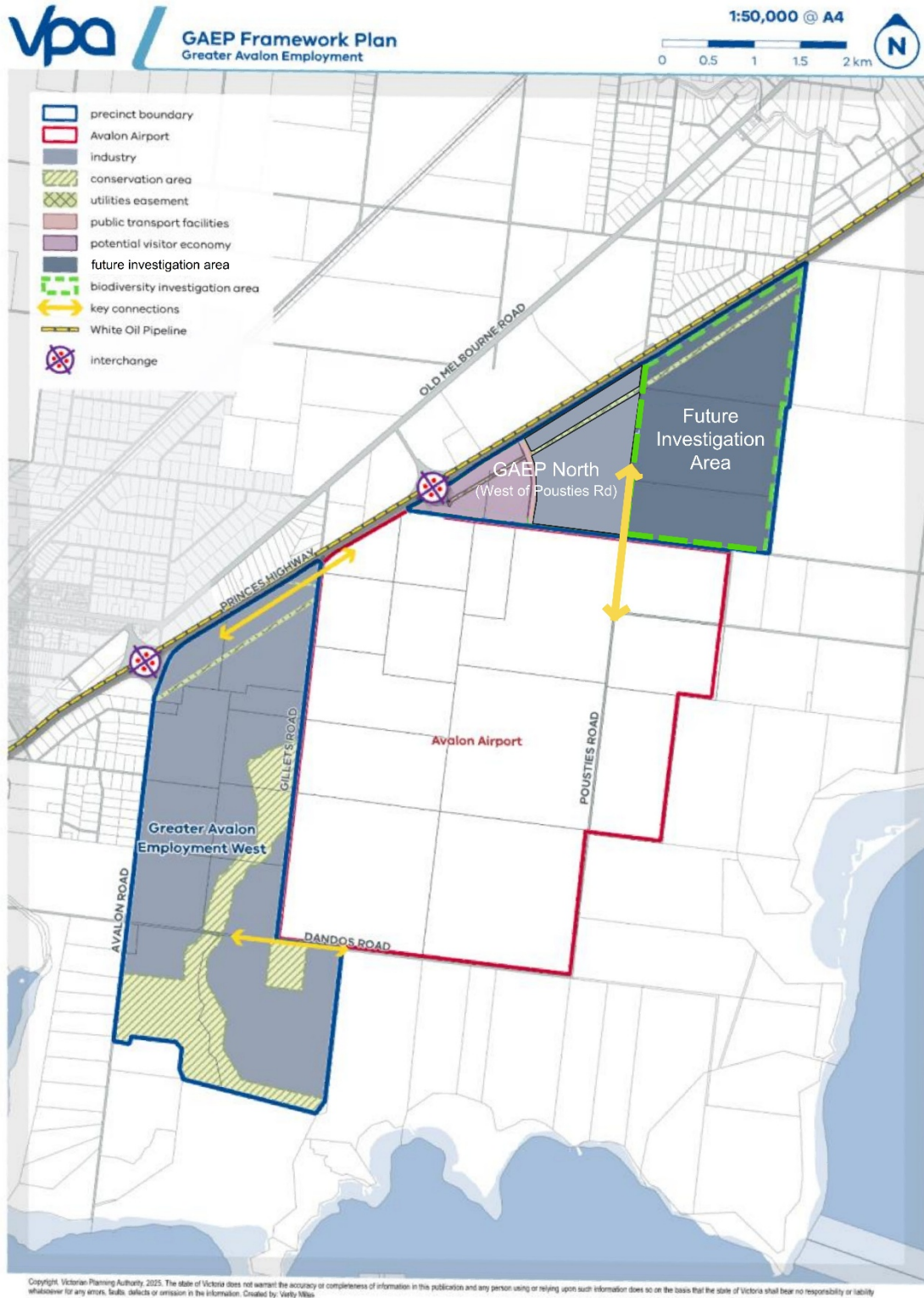
~~Ensure that planning of the Greater Avalon Employment Precinct North is supported by:~~

- ~~• Beach Road interchange being upgraded to provide additional capacity to meet the needs of Avalon Airport, and that any necessary additional freeway and interchange capacity is available or can be constructed for the Greater Avalon Employment Precinct North.~~
- ~~• Confidence in the ability to deliver a drainage development services scheme including obtaining the relevant environmental approvals and obligations under state and federal legislation.~~
- ~~• Arrangements being in place to construct utility infrastructure to service the Greater Avalon Employment Precinct North.~~
- ~~• Strategic justification demonstrating the need for additional employment land within the Greater Avalon Employment Precinct North to contribute to the regional employment land supply.~~
- The preparation of a Precinct Structure Plan or other suitable strategic plan.

Greater Avalon Employment Precinct Framework Plan map



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Appendix G

Site Specific Control Overlay proposed to apply to all landholdings within GAEP North (West of Pousties Road)

STATE INFRASTRUCTURE
GREATER AVALON ~~NORTH~~
EMPLOYMENT PRECINCT
NORTH (WEST OF POUSTIES
RD)

Draft Incorporated Document
November 2025

1. INTRODUCTION

- 1.1 This document is an incorporated document in the Greater Geelong Planning Scheme (the **Planning Scheme**) pursuant to section 6(2)(j) of the *Planning and Environment Act 1987*.
- 1.2 Despite any provision to the contrary in the Planning Scheme, pursuant to clause 45.12 of the Planning Scheme, the land identified in this document may be developed in accordance with the specific controls contained in this document. If there is any inconsistency between the specific controls contained in this document and the general definition provisions of the Planning Scheme, the specific controls in this document prevail.
- 1.3 In this document the following terms are defined as follows:
- 1.4 **Infrastructure Item** means an upgrade to the Beach Road/Princes Freeway interchange.
- 1.5 **Permitted Development** means any development that is permitted under a planning permit.
- 1.5 **Permitted Use** means any use that is permitted under a planning permit.
- 1.6 **The Precinct** means the Greater Avalon Employment Precinct [North](#) (West of Pousties Road) as shown on Map 1 of this document.
- 1.7 **Upgrade** shall mean an increase in the capacity of the Beach Road/Princes Freeway interchange to safely accommodate a daily volume of traffic of greater than _____ vehicles.

2. THE LAND TO WHICH THIS INCORPORATED DOCUMENT APPLIES

- 2.1 The land is all of that land to which the Greater Avalon Employment Precinct North (West of Pousties Road) Development Plan Overlay applies. This is identified as Greater Avalon Employment Precinct North (West of Pousties Road) on Map 1 of this document and mapped SCO by Clause 45.12 Specific Controls Overlay within the Planning Scheme.

3. BACKGROUND AND PURPOSE

- 3.1. The background to this document is that:
 - a. As at the date of this document, the existing road network does not have sufficient capacity to accommodate the additional traffic demand that is anticipated to be generated from new development within the Greater Avalon Employment Precinct West, the Precinct, the Avalon Airport and [the](#) Avalon Airport employment land when fully developed.
 - b. The Infrastructure Item will ultimately be required as part of a safe and efficient road network, which provides access to the Greater Avalon Employment Precinct West, the Precinct and Avalon Airport.
 - c. Absent or in addition to any other infrastructure improvements approved by the Responsible Authority, the delivery of the Infrastructure Item will ensure development within the Greater Avalon Employment Precinct West, the Precinct and Avalon Airport is supported by adequate transport infrastructure and avoids inappropriate and unsafe traffic impacts.

4. SPECIFIC CONTROLS

- 4.1 Prior to the issue of a statement of compliance, or occupation of any permitted development, or commencement of any permitted use in respect of any land in the Precinct, unless the Responsible Authority and Head, Transport for Victoria are both satisfied that the permitted development or use will not unreasonably impact upon the operations of Avalon

| Airport, an Upgrade to the Beach Road/Princes Freeway interchange must have been completed to the satisfaction of the Responsible Authority and Head, Transport for Victoria.

5. REQUIREMENTS FOR PERMITS

None specified.

6. EXPIRY OF THIS DOCUMENT

- 6.1. This incorporated document will expire on the delivery of the Infrastructure Item Identified in this document.



LEGEND

- | | |
|---|--|
| Visitor economy | High level drainage concept |
| Industry | Public transport facilities |
| Connector road | Utilities easement |
| Arterial road | |

GAEP North (west of Pousties Road) Development Plan

NB: Proposed connector road layout is indicative only and may be subject to change.