

10 December 2025

ABN 25 600 688 604

Level 2

22 Kings Place

South Melbourne, VIC 3205

pro-urban.com.au

Regional Victoria | New Communities | Spatial Planning
Department of Transport and Planning
GPO Box 2392
Melbourne, VIC 3001

Dear [REDACTED],

**1-45 BEACH ROAD, LARA
GREATER AVALON EMPLOYMENT PRECINCT SUBMISSION**

proUrban, Advisory, Planning & Management ('proUrban') act on behalf of *Avalon Industrial Landholding Pty Ltd*, the owner of the land at 1-45 Beach Road, Lara ('the site').

The landowner has requested that proUrban prepare and submit a written submission to the draft plans for the Greater Avalon Employment Precinct released on 14 November 2025. The site is within proximity to the Greater Avalon Employment Precinct identified within the 'Future Precincts & Investigation Areas' however, is not identified as an area able to accommodate for demand or support increased development.

The landowner is broadly supportive of the GAEP and the associated proposed planning scheme amendment and planning framework. This submission is seeking to ensure the site's inclusion within the Greater Avalon Employment Precinct boundary area. By seeking the site's inclusion, it allows for an appropriate level of development to occur on the site, reflective of the objective to provide a sufficient support of industrial land in locations with high amenity and access to logistics infrastructure.

Executive Summary

To support the sustained economic growth of the region and ensure sufficient industrial land supply for future employment and investment, the Victorian Planning Authority (VPA) has prepared draft amendment C477ggee to the Greater Geelong Planning Scheme to deliver the Greater Avalon Employment Precinct (GAEP). The draft amendment sets out the intention to delivery capacity for 8,000 new jobs of an estimated 26,500 jobs at full build out of GAEP including at Avalon Airport.

The subject site is located directly across Princess Freeway, within close proximity to the GAEP North and shares many of its strategic advantages, including access to major road and freight corridors and potential synergies with existing and emerging industrial uses. Given this proximity and the complementary role the land can play in supporting the region's industrial and employment objectives, it is considered appropriate that the site be included within the broader GAEP framework or acknowledged as a logical extension of it.

Accordingly, this submission has been prepared to ensure that the site is accurately represented within draft amendment C477ggee, and to advocate for its inclusion within, or direct alignment to, the Geelong Ring Road

Employment Precinct, thereby reinforcing its strategic role in supporting Geelong's industrial land supply and economic development objectives.

Current Planning Controls

The site is situated within Greater Geelong City Council and subject to the following planning scheme controls:

- The site is located within the **Farming Zone ('FZ')**.
- The site is subject to the following overlays:
 - **Environmental Significance Overlay – Schedule 4 ('ESO4')**.
 - **Land Subject to Inundation Overlay – Schedule 10 ('LSIO1')**.

Based on the current planning scheme controls applicable to the subject site, it is acknowledged that the Farming Zone (FZ) primarily encourages agricultural and farming-related uses. However, the relevant provisions of the FZ also allow for consideration of planning permission for certain complementary or transitional land uses, including warehousing, storage facilities, and industrial activities, where these are deemed appropriate in context.

While the overarching intent of the FZ is to preserve land for agricultural purposes, there is a discernible and progressive transition occurring within this locality toward industrial and employment-generating land uses. This shift reflects broader strategic trends in land use and development within the surrounding area.

Although the site is located outside the boundary of the Greater Avalon Employment Precinct, it is currently being developed in accordance with Planning Permit No. PP-746-2022/A (the 'Permit'). A detailed summary of the permit history of the land is provided as follows:

PP-852-2015	<i>Use and development of the land for a materials recycling facility in a farming zone subject to an environmental significance overlay; reduction in the number of car parking spaces required under Clause 52.06-5 generally in accordance with the endorsed plans.</i>
PP-498-2021	<i>Removal of Native Vegetation.</i>
PP-1537-2021	<i>Use and Development of a Store, including the Construction of a Storage Pad, Storage of Site Sheds and associated Building Materials.</i>
PP-746-2022	<i>Use and development for a warehouse and store, reduction of carparking and removal of native vegetation generally in accordance with endorsed plans.</i>

Further to the above, it is important to note that road upgrades along the site boundary at Beach Road were undertaken as part of the initial planning permit, ensuring development of this nature was able to be accommodated. These approvals signify a recognition by the responsible authority of the evolving land use character of the area and the appropriateness of such development in supporting the ongoing economic and industrial transition of the precinct.

Site Context and Surrounding Area

The subject site comprises an irregularly shaped parcel of land with a total area of approximately 44.43 hectares. The property benefits from a primary frontage to Beach Road along its western boundary, with additional interfaces to Old Melbourne Road to the north and the Princes Freeway to the east and south. This strategic positioning provides the site with convenient access to key regional transport corridors, enhancing its suitability for employment and industrial based uses.

The surrounding locality is predominantly characterised by agricultural land uses, which currently accommodates a mix of farming and rural activities, including crop production and livestock grazing. Notable nearby uses include the Geelong Motorsport Complex and the Avalon Raceway, both of which contribute to the area's semi-rural yet evolving

character.

While these uses align with the traditional intent of the FZ, recent planning approvals within the broader precinct indicate a discernible transition towards industrial and employment generating land uses. This emerging trend is consistent with the strategic direction to support and expand nearby industrial precincts, particularly the Geelong Ring Road Employment Precinct (GRREP), and to facilitate the region's long-term economic growth.

At present, the site is occupied and operated by Sycle, a waste management and resource recovery enterprise that specialises in the processing of construction and demolition materials into reusable products. In support of this use, the site is undergoing development in accordance with Planning Permit No. PP-746-2022/A. These works are intended to enhance the operational capacity of the facility and ensure the site's long-term contribution to the region's growing industrial framework.



Figure 1 | Subject site (Source: Landchecker)

Strategic and Policy Context

Local Planning Policy – Greater Geelong Planning Scheme

At the local level, the City of Greater Geelong's Municipal Strategic Statement (MSS) and Municipal Planning Strategy sets out detailed policies for economic development and industry. Notably, Clause 02.03-7 (Industry) of the Greater Geelong Planning Scheme highlights the need to provide for ongoing employment growth and industrial land supply. It states the importance of "maintaining and improving infrastructure including roads, rail and Avalon Airport" to support industry. The clause gives strategic directions to:

- Provide an adequate supply of industrial land that meets industry needs.
- Focus new industrial development around major transport routes and infrastructure (such as Avalon Airport and the freeway network).
- Encourage growth of new and sustainable industry sectors.
- Provide a diverse range of high-quality industrial land for different uses.

Whilst the site is not clearly identified as industrial land through its zoning, the existing warehouse/store land use lends itself to its operational industrial character. Its location adjacent to major transport routes, including the Princes Highway and nearby rail corridor, directly aligns with the MSS strategic direction to focus industrial development around transport infrastructure. Furthermore, the site contributes to the diversity and capacity of industrial land in the region, reflecting the Clause's broader objective of delivering sufficient industrial land to meet current and future industry needs.

G21 Regional Growth Plan (2013)

The G21 Regional Growth Plan provides a long-term strategic framework for managing population, economic, and employment growth across the Geelong region. It identifies Avalon Airport and its surrounding corridor as a strategically significant economic and employment node, with the potential to accommodate industries such as manufacturing, logistics, freight, and aviation. While the Plan does not specifically reference 1–45 Beach Road, Lara, the site is located within this corridor and is therefore subject to the broader strategic intentions of the Plan.

Policy guidance referenced in the G21 Regional Growth Plan relevant to the site is as follows:

- Recognizes Avalon Airport and surrounding areas as a major regional employment node.
- Emphasizes the use of existing infrastructure and transport assets to support growth.
- Prioritizes development in strategically significant locations rather than dispersed rural areas.
- Supports the consolidation of industrial and employment uses within the corridor.
- Highlights the importance of concentrating growth around Avalon to protect landscapes and avoid inefficient use of land elsewhere.

Avalon Corridor Strategy (2022)

The Avalon Corridor Strategy (ACS) is a high-level land use strategy prepared by the City of Greater Geelong and Wyndham City with the Victorian Government. It seeks to manage growth in the Avalon Airport corridor while preserving the “green break” between Melbourne and Geelong. The ACS identifies the North Precinct, which includes the site, as part of the Greater Avalon Employment Precinct, a state-significant industrial and commercial district designed to leverage Avalon Airport’s strategic role.

Policy guidance referenced in the ACS relevant to the site is as follows:

- The site is identified as part of the Study Area boundary.
- Recognizes the area as suitable for coordinated industrial and employment-generating development.
- Encourages avoidance of ad-hoc or fragmented development that could preclude future large-scale employment uses.
- Supports protection of potential future transport corridors, including a rail link to Avalon Airport.
- Reinforces the corridor’s role as a strategic location for industrial and commercial activity while maintaining landscape and environmental values.
- Highlights the need for coordinated precinct planning rather than piecemeal rezoning.

Plan for Victoria

Plan for Victoria is the Victorian Government’s overarching state planning strategy that sets out a long-term vision for land use, growth, and development across the state. It provides the strategic framework to guide regional and local planning, ensuring alignment between population growth, housing, employment, infrastructure, and environmental outcomes.

In relation to industrial land in Geelong and the broader region, Plan for Victoria emphasizes the importance of maintaining an adequate and well-located supply of employment land to support regional economic growth and investment attraction. It identifies regional cities such as Geelong as key locations for industrial and logistics development due to their strategic transport connections, skilled workforce, and proximity to Melbourne and key freight corridors. Further, Geelong is identified as one of the three major regional cities that is anticipated to accommodate the most homes thus, access to employment is paramount to the success of the area.

As it relates to Greater Geelong City Council, Plan for Victoria provides the following strategic policy guidance:

- Reinforces the role of regional cities such as Geelong as critical hubs for job creation, advanced manufacturing, and logistics activity, complementing Melbourne's metropolitan economy.
- Identifies Geelong as a key regional city with capacity to accommodate significant employment and population growth.
- Supports the provision of well-located, serviced industrial land to meet long-term regional and state economic needs.
- Recognises the dwindling supply of affordable industrial land across Victoria, emphasising the need for proactive land supply management in growing regional centres such as Geelong.
- Encourages coordinated precinct planning to deliver large-scale, employment-generating industrial development rather than ad hoc or fragmented rezonings.
- Promotes integration with freight and transport networks, supporting strategic connections between Geelong, Avalon Airport, and Melbourne.

Assessment and Strategic Justification

Draft amendment C477ggee fails to acknowledge the existing and approved industrial uses of 1–45 Beach Road, Lara and does not include it within any designated GAEP North industrial precinct boundary. This omission risks constraining existing businesses, creating a misalignment between land use policy and existing activity, and undermines the Review's stated objective of accurately assessing the region's industrial land supply. The site's location within the Avalon corridor and the North Precinct, as identified in the Avalon Corridor Strategy, and its alignment with the G21 Regional Growth Plan and Clause 02.03-7 of the Greater Geelong Planning Scheme, demonstrate that it falls within the strategic intent for coordinated industrial and employment growth. Further, its location situated in close proximity to GAEP North makes the site a logical inclusion into the precinct, ensuring the existing industrial character is appropriately tied to the intention of the precinct.

The following summary outlines how draft C477ggee overlooks the strategic and practical suitability of the site for inclusion in GAEP North:

- The existing industrial use of the land suggests the land is already operating in an industrial capacity, demonstrating an established pattern of industrial activity and functional alignment with the employment outcomes sought by GAEP. By leaving the land out of the GAEP North boundary, the amendment does not acknowledge existing non-rural land use nor the strategic employment function already occurring on site.
- In failing to account for the established industrial use and the long-recognised strategic suitability of this land for employment and logistics activity, draft amendment C477ggee neither recognises nor responds to the site's demonstrated role within the Avalon employment corridor. Its omission from the designated industrial precinct boundary results in a planning outcome that is inconsistent with previous strategic direction, including work that identified GAEP North as necessary future employment land once servicing and infrastructure issues were resolved.
- The land at 1–45 Beach Road is of an appropriate scale, configuration and locational advantage to meaningfully contribute to future industrial and employment supply within GAEP North. Its proximity to Beach Road, the Princes Freeway, Avalon Airport and future freight/transport infrastructure makes it well-suited to support industrial, logistics, warehousing and service-industry uses. Excluding the land unnecessarily constrains the future growth capacity of the precinct and risks shifting industrial demand to less strategically suitable locations.

- The site forms part of the broader Avalon Corridor where coordinated planning for employment, freight, drainage and transport infrastructure has long been anticipated. Inclusion of 1–45 Beach Road within GAEP North would support more coherent integration of land use, transport interfaces and servicing outcomes, consistent with the overarching intent for the Greater Avalon precinct.

Finally, as GAEP North has not progressed to draft amendment or public exhibition, there is ample opportunity at this stage to incorporate the land at 1-45 Beach Road within the precinct. The planning outcomes for GAEP North remain unfixed, and including the site now would appropriately recognise its existing industrial use, strategic location and suitability for future employment purposes.

Conclusion

For the above reasons we submit that the land at 1-45 Beach Road, Lara should be incorporated into the Greater Avalon Employment Precinct and draft amendment C477ggee be amended accordingly.

Accordingly, we request the opportunity to discuss the inclusion of the site within the Industrial Land Supply Review in further detail. Should you have any further questions, please don't hesitate to contact the undersigned on [REDACTED]

[REDACTED]
Yours sincerely,

[REDACTED]
Director