

11 December 2025

[REDACTED]
[REDACTED]
Housing, Building and Land Delivery
Department of Transport and Planning

Email: GAEP@transport.vic.gov.au

Dear [REDACTED],

GREATER AVALON EMPLOYMENT PRECINCT – DRAFT AMENDMENT C477GGEE

Thank you for the notification of the proposed Planning Scheme Amendment C477ggee to deliver the Greater Avalon Employment Precinct. This submission is made by Parks Victoria in its relevance as the land manager for the adjacent Avalon Coastal Reserve (the Reserve).

Parks Victoria's interest relates to the risks and opportunities associated with the changes in stormwater volume, quality and timing from the development to the Reserve.

Parks Victoria has been actively engaged in discussions with Victorian Planning Authority (VPA) and have provided advice and input into the proposed development.

Land management legislative context

Parks Victoria is a statutory authority of the Victorian Government, established by the *Parks Victoria Act 2018* (PV Act).

As prescribed in the PV Act, Parks Victoria's objectives are to manage land for protection and enhancement; support Traditional Owner knowledge and interests; and to provide for community enjoyment and wellbeing.

Parks Victoria is responsible for managing a diverse public land estate of approximately 4 million hectares, including more than 3,000 land and marine park and reserves that make up 18 per cent of Victoria's area and 70 per cent of its coastline.

As relevant to the proposed Greater Avalon Employment Precinct, Parks Victoria manages the Avalon Coastal Reserve, which is reserved under the *Crown Land Reserves Act 1978*.

Proposed Planning Scheme Amendment

Stormwater management remains an area of interest for Parks Victoria, with some issues unresolved in the documents exhibited. Of relevance to Parks Victoria are the uncertainties related to potential impacts to the

Reserve and associated biodiversity values, as outlined in the HARC Position Paper (HARC, 2025). For example, the absence of comprehensive hydrological modelling of the upstream catchment and flows through to the Reserve. It would be ideal if these uncertainties can be dealt with now, to provide for a level of confidence for the proposed development and protection for the Reserve.

Irrespective of sequencing, Parks Victoria recommends that any Drainage and Stormwater Management Strategy that is prepared also explore a broad range of stormwater management options, given this dynamic environment has a level of uncertainty.

Parks Victoria also suggests separating out the assessment of ecological impacts of the receiving environment from the Drainage and Stormwater Management Strategy. Having this as a separate piece of work may provide for a more comprehensive and robust assessment.

Thank you for the opportunity to provide a further submission.

Should you require further information in relation to this matter, please contact me via email at

[REDACTED]

Yours sincerely

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Director Management Planning and Effectiveness