

Enquiries To: [REDACTED]

11 December 2025

[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED],

Re: Barwon Water Submission - Amendment C477ggee (Greater Avalon Employment Precinct)

Barwon Water provides the following response to the above mentioned Amendment C477ggee for the Greater Avalon Employment Precinct (GAEP). Our previous letter, dated 15 May 2025, (attached) remains relevant to the exhibited documentation. This submission reiterates the key points and provides some context to consider as part of the amendment.

1. Planning and approvals remain uncertain, so a negotiated NCC framework is still appropriate.

We reaffirm our position that negotiated New Customer Contributions (NCC) should apply to GAEP given the scale, isolation and timing uncertainty associated with essential infrastructure. This approach provides the most flexibility to enable progress, protects existing customers and provides a transparent pathway for proponents during detailed design and approvals. All assets will need to be delivered to Barwon Water standards, with the potential for special design requirements to mitigate risks associated contaminants of concern.

2. Barwon Water has progressed its servicing strategy and notes alignment with the exhibited Utility Assessment work.

Since May, we have continued to advance work on water and sewer servicing options for GAEP and the broader Avalon Airport area. This includes upsizing an additional water connection across the Princes Fwy. The exhibited material prepared by Spiire reflects the current understanding of constraints and servicing challenges, and we support continued integration of this work in the DPO schedule.

3. Recycled water: concept pathway via the Northern Water Plant (NWP) to Avalon.

To meet potential large-volume demands without relying on drinking water, Barwon Water has developed a concept to supply fit-for-purpose recycled water to Avalon. The initial pathway would utilise spare capacity at the Northern Water Plant in Corio, with subsequent connections to future alternative water infrastructure as regional growth proceeds. We would welcome discussion with key developers or customers as the development proceeds.



4. Integrated Water Management (IWM) remains essential.

We continue to support a whole-of-precinct IWM approach. We recommend clear requirements for a coordinated (whole of precinct) drainage and IWM strategy that addresses environmental values and long-term resilience.

Conclusion

Barwon Water supports the Amendment C477, on the basis outlined below.

In order to provide flexibility and enable progress within the uncertainties of hydrology, stormwater, biodiversity, integrated water management, developable land and discharge points within the precinct, Barwon Water proposes that negotiated New Customer Contributions should be utilised for the precinct. Under this approach developers would be required to fund and deliver all water and sewerage servicing assets required to service the precinct to Barwon Water standards beyond designated supply / connection nodes. This will mean that the risks associated with the current uncertainties and timing of servicing



infrastructure provision are managed by the developers who are in the best position to do so, rather than being carried by Barwon Water's existing customers.

Yours sincerely,

[Redacted signature]

[Redacted name]

Attach: Barwon Water Submission May 2025

Enquiries To: [REDACTED]

15 May 2025

[REDACTED]

[REDACTED]

Victorian Planning Authority

Dear [REDACTED],

Re: Agency Validation – Greater Avalon Employment Precinct (GAEP)

I refer to the letter received on the 15th April 2025 regarding the above mentioned Avalon Agency Validation. Barwon Water has reviewed the draft documentation to support planning for the precinct and provides the following response.

VPA Queries & General Feedback

1. *Do you support the drainage position paper?*
2. *Does the DPO schedule address all of the documentation requirements for the drainage and servicing elements of the future development plans?*
3. *Does the draft DPO provide sufficient opportunity for Barwon Water to provide comment on future development plan applications?*

Barwon Water is the authority responsible for water, sewerage and recycled water services in the region. Drainage and stormwater management is not within Barwon Water's jurisdiction, however, we work closely with our agency partners, such as City of Greater Geelong, to ensure that future development is underpinned by integrated water management considerations. Barwon Water supports City of Greater Geelong's position in relation drainage and stormwater management in the GAEP.

The reports prepared by HARC, Alluvium and Water Technology identify a number of key aspects in relation to drainage, stormwater management and integrated water management (IWM) that need to be resolved to protect environmental values and support resilient, liveable urban development outcomes, including potential impacts on RAMSAR-listed wetlands and compliance with key legislation such as the EPBC Act, Marine and Coastal Act, and relevant state coastal policy. While we acknowledge that some of these may be addressed at later planning stages, until these are explored and resolved, there remains uncertainty as to the developable land within the proposed DPO. An understanding of the developable land within

the DPO is important for Barwon Water's planning of infrastructure to service the land in an efficient, timely and sustainable manner.

Water Supply and Sewerage Infrastructure

From a water and sewerage infrastructure servicing perspective, the scale and isolation of the Avalon precinct means that infrastructure planning will require a long lead time. With this in mind we have invested in infrastructure upgrades upstream in our network to better facilitate a future water connection.

To best manage the current level of uncertainty of the developable area, and consistent with the Negotiation Framework in Barwon Water's New Customer Contributions Guidelines, developers within the GAEP will be responsible for designing, funding and delivering all necessary water and sewerage infrastructure to service their development within the precinct, including pipeline connections across to Barwon Water's network in Lara. In accordance with standard developer works practices, this infrastructure will need to be designed and delivered to meet Barwon Water's standards and requirements and then vested to Barwon Water. Negotiated New Customer Contributions will also be applicable, consistent with ESC pricing principles.

This approach is necessary to manage uncertainty associated with the timing, scale and feasible areas of the development and to ensure that Barwon Water's existing customers are not exposed to risks associated with servicing of the GAEP. We also note that, due to potential legacy contamination issues within the GAEP, and risk of saline water ingress to sewers due to low elevation of the GAEP, there may be special design measures required to be implemented by developers to manage these risks and possible limitations on the quality and volume of sewage that can be received into the broader Geelong network. This will need to be considered in more detail as part of any future servicing strategy.

Conclusion

Barwon Water supports the development of Avalon, on the basis it is underpinned by the necessary strategies to protect the natural assets of the area and support the effective delivery of essential infrastructure. While we acknowledge the progress made to date, we remain aware that key strategic issues—particularly around drainage and integrated water management—have not yet been resolved.

We emphasise the importance of a coordinated drainage and IWM strategy to provide the certainty required for infrastructure planning and environmental protection. In our view,

finalising such a strategy is a critical next step and should preferably occur prior to any further advancement of the DPO to give greater certainty to Barwon Water's infrastructure planning. We remain committed to working collaboratively with the VPA, councils, and IWM Forum partners to address these challenges and support integrated, sustainable outcomes for this significant growth area.

Yours sincerely,

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Barwon Water