

11 December 2025

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Department of Transport and Planning
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Melbourne VIC 3000

Dear [REDACTED]

Submission to draft Planning Scheme Amendment C477ggee

1 Introduction

We act for 55 Beach Road Pty Ltd, the owner of land at 55 Beach Road, Avalon, within the Greater Avalon Employment Precinct (**GAEP**) North precinct.

We welcome the opportunity to provide a submission to draft Amendment C477ggee (**Amendment**). Our client supports the strategic vision for the GAEP as a nationally significant employment, aviation and visitor-economy precinct centred around Avalon Airport.

In this context, our client seeks the inclusion of 55 Beach Road within the current rezoning. This request is based on the strategic intent expressed in the exhibited material, the defined role of the Visitor Economy Precinct, and the technical investigations that demonstrate the site can progress in an orderly and coordinated manner alongside GAEP West.

2 Overview of the Amendment as relevant to 55 Beach Road

Amendment C447ggee proposes to:

- Rezone GAEP West to the Industrial 1 Zone and Rural Conservation Zone Schedule 16, and apply the Development Plan Overlay Schedule 50 (**DPO5**) and other overlays.
- Introduce a new Framework Plan into Clause 11.03-6L-04 to guide the development within the GAEP.
- Retain GAEP North, including the Visitor Economy Precinct and 55 Beach Road, within the Farming Zone.

The exhibited background reports contain technical and strategic assessments relevant to both GAEP West and North. Within this material:

- The Framework Plan identifies a clearly defined Visitor Economy Precinct within GAEP North.

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- The Visitor Economy Precinct is shown to have a direct functional relationship with Avalon Airport, supporting tourism, visitor services, business travel and aviation workforce needs.
- The technical reports indicate that the land use characteristics and infrastructure demands of visitor economy uses are distinct from those of industrial development and may be capable of progressing on a separate pathway.

Together, the exhibited materials present a reasonable basis for including the Visitor Economy Precinct, particularly 55 Beach Road which has the clearest airport interface, to progress concurrently with GAEP West.

3 Why 55 Beach Road should be included in the current rezoning

The exhibited Framework Plan and supporting technical reports identify a coherent planning basis for progressing the Visitor Economy Precinct, including 55 Beach Road, as part of the Amendment. Throughout the GAEP planning process, the Visitor Economy Precinct has been consistently recognised as having a distinct role, particularly in relation to Avalon Airport and the broader visitor and worker catchment.

Three overarching considerations support its inclusion at this stage:

1. The Visitor Economy Precinct has a defined land use function that is separate from industrial land use considerations.
2. Its infrastructure requirements and staging profile operate independently from GAEP West.
3. Its strategic purpose directly aligns with Avalon Airport's role as a major regional gateway.

Together, these considerations indicate that the Visitor Economy Precinct can be incorporated into the rezoning in a coordinated and orderly manner.

3.1 A distinct land use function

The Framework Plan identifies a Visitor Economy Precinct within GAEP North and distinguishes it from the industrial land emphasis of the remainder of GAEP. The Visitor Economy Precinct's intended purpose – to accommodate airport supported visitor, tourism, business and worker focused services – is reinforced by both the SGS economic assessment and the preceding GAEP planning process.

The anticipated land uses for the Visitor Economy Precinct differ materially from industrial land and may include:

- Accommodation and short stay options.
- Conference and meeting facilities.
- Business services and worker amenities.
- Tourism and visitor supporting uses.
- Mixed commercial and hospitality uses.

These uses respond to airport generated demand and broader regional visitation patterns rather than industrial supply dynamics. As such, their progression is not dependent on industrial staging criteria or the provision of freight related infrastructure.

Including 55 Beach Road within the Amendment would allow the rezoning to reflect the distinct planning purpose articulated for this part of GAEP North.

3.2 Alignment with Avalon Airport's regional gateway role

The Visitor Economy Precinct is positioned at the interface of Avalon Airport, the Princes Freeway and the Geelong – Werribee corridor. This presents a unique opportunity to accommodate land uses that directly support Avalon's passenger movements, business travel and aviation workforce and visitor activity.

The exhibited Framework Plan highlights this strategic interface, and the background assessments identify airport related economic activity as a major influence on GAEP North. The land at 55 Beach Road is particularly well placed to contribute to this outcome, given its:

- Visibility from the Princes Freeway.
- Proximity to the airport entry.
- Function as a gateway into the precinct.
- Ability to accommodate visitor services, tourism and supporting commercial uses.

Including 55 Beach Road in the current rezoning would enable airport related land uses to progress coherently with the broader GAEP structure and Avalon's developing regional role.

3.3 Manageable infrastructure requirements and low technical burden

The technical reports exhibited with the Amendment indicate that the infrastructure and servicing profile of the Visitor Economy Precinct differs from that of industrial land and can be addressed through targeted, localised responses.

Transport:

The Jacobs Integrated Transport Assessment (**ITA**) identifies that industrial activity within the GAEP will generate substantial heavy vehicle volumes and therefore requires a series of significant road and interchange upgrades. In contrast, the anticipated uses within the Visitor Economy Precinct, such as hotel accommodation, conferencing, worker services, retail and tourism-serving activities, produce a very different demand profile. These uses generate minimal freight movements, typically peak outside industrial operating hours, and align with the existing airport access patterns associated with passenger, staff and visitor activity. Accordingly, the **ITA** does not identify transport constraints that would necessitate linking the precinct to significant interchange upgrades, with expected impacts able to be managed through localised access and intersection treatments.

Drainage:

We understand Melbourne Water is progressing its Development Services Scheme for GAEP North, and it is reasonable that drainage for the Visitor Economy Precinct would adopt the same overarching approach applied to GAEP West via DPO50.

Utilities:

Spiire's servicing assessment identifies no systemic constraints that differentiate GAEP North from GAEP West in terms of its ability to support non-industrial development. Visitor economy uses generally impose moderate and predictable servicing demands that can be staged in alignment with development.

Biodiversity:

The EHP assessments do not identify any biodiversity issues for 55 Beach Road nor the broader Visitor Economy Precinct.

Collectively, the technical assessments indicate that the infrastructure and environmental considerations for 55 Beach Road can be managed through established development processes and do not present a barrier to its inclusion in the current rezoning.

3.4 Logical and orderly staging

The Visitor Economy Precinct has the capacity to advance as a self-contained early stage of GAEP North. Its access, drainage and servicing requirements can be coordinated through a site specific DPO or equivalent controls, without reliance on the more extensive infrastructure required for industrial development.

Progressing 55 Beach Road at this stage would:

- Provide early activation at the precinct's gateway.
- Support Avalon Airport's visitor and workforce functions.
- Maintain consistency with the strategic direction outlined in the Framework Plan.
- Ensure the Amendment reflects the distinct staging considerations of airport serving land uses.

The exhibition materials do not provide any reasonable justification for the exclusion of GAEP North from the current rezoning, and the references within the exhibition materials to a potential 2056 timeframe are unrealistic and misaligned with the balance of the strategic work underpinning the Framework Plan. Moreover, in the period since the Amendment was put on exhibition, DTP has openly advised landowners that:

"DTP remains committed to delivering the planning framework to guide the sequenced development of the entirety of the Greater Avalon Employment Precinct by June 2026, supporting the job creation and economic growth for the region."

To the extent that DTP intends to deliver the planning framework for the development of the entirety of GAEP within the next 6 months, this only lends further support for rezoning GAEP North, and particularly the Visitor Economy Precinct, as part of the Amendment. It will be inefficient to persist with a staggered rezoning process where there is little that can, or even needs to, be achieved in the intervening period between this Amendment and June 2026. The delay will only serve to create unnecessary uncertainty for landowners and development in GAEP North.

On this basis, inclusion of (at least) the Visitor Economy Precinct and 55 Beach Road in the current rezoning is considered orderly, coordinated and consistent with the purpose of the Amendment.

4 Pathway to include 55 Beach Road in the Amendment

To give effect to the strategic intent identified in the exhibited material and support coordinated progression of the GAEP, we request inclusion of the Visitor Economy Precinct, including 55 Beach Road, within the current rezoning. Several implementation pathways are available.

4.1 Apply the exhibited land use intent through rezoning

The Framework Plan already identifies a Visitor Economy Precinct in GAEP North. Applying an appropriate zone to the Visitor Economy Precinct as part of this Amendment would ensure the planning scheme reflects this strategic direction.

Potential zoning approaches include:

- A Commercial or Mixed Use Zone which will support visitor-economy and airport-supporting uses; or
- An Industrial 3 Zone with a site-specific schedule that provides for airport-related tourism, business services and associated uses.

Both approaches can be supported by site-specific built form and interface controls.

4.2 Apply a tailored Development Plan Overlay

A tailored DPO schedule can address all technical matters raised in technical reports, modelled on the structure of DPO50. This approach allows the rezoning to occur now, while retaining full control over implementation.

4.3 Suggested amendments to Clause 11.03-6L-06

To provide clarity regarding staging expectations for the Visitor Economy Precinct, minor amendments to the local policy should be made to recognise that it is on a different staging pathway with different land use expectations to freight and industrial development. The following two amendments are considered appropriate for this purpose:

- Amending the current strategy as follows:

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

- Inserting a new strategy:

The Visitor Economy Precinct in GAEP North may progress independently of industrial staging considerations.

The existing strategies contained in Clause 11.03-6L-06 are too confined and do not have regard to the intent of the Framework Plan to facilitate broader land uses in addition to freight and industrial development, particularly in the Visitor Economy Precinct. These amendments reflect the distinct land-use role identified in the Framework Plan and supported by the exhibited SGS assessment, and provide policy support for the Visitor Economy Precinct to advance where appropriate planning controls are in place.

4.4 Suggested amendments to Design and Development Overlay – Schedule 53

Development should respond to the broader role that GAEP North and particularly the Visitor Economy Precinct will play a role as a gateway to the Avalon precinct and the Avalon Airport. To this end, the development of the Visitor Economy Precinct, including 55 Beach Road, can be facilitated efficiently and simply by with the following amendment to the design objectives set out in clause 1.0 of the exhibited DDO53:

To facilitate the development of the Greater Avalon Employment Precinct North 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.

5 Conclusion

Our client supports the long-term vision for the GAEP and the establishment of a Visitor Economy Precinct.

Based on the exhibited Framework Plan and technical assessments:

- The Visitor Economy Precinct performs a distinct role not governed by industrial staging.
- Infrastructure and servicing requirements for visitor economy uses are manageable.
- 55 Beach Road is strategically positioned to support Avalon Airport's gateway function.
- The Visitor Economy Precinct can be progressed in an orderly manner through appropriate planning controls.

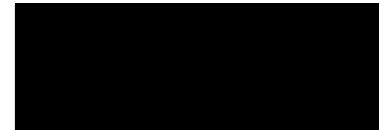
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On this basis, we request that 55 Beach Road be included in the current rezoning as part of the Visitor Economy Precinct. Moreover, whilst this submission advocates for the inclusion of 55 Beach Road due to its role as part of the Visitor Economy Precinct, our client also supports the inclusion of the balance of GAEP North located west of Pousties Road in the current rezoning process.

Please contact me on [REDACTED] should you have any questions regarding this matter.

Yours faithfully



Norton Rose Fulbright Australia