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ABN 25 600 688 604  
Level 2  
22 Kings Place  
South Melbourne, VIC 3205  
[pro-urban.com.au](http://pro-urban.com.au)

██████████  
Strategic Planning Manager  
Department of Transport and Planning  
GPO Box 2392  
Melbourne, VIC 3001

Email: ██████████  
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Dear ████████,

### **340 PLAINS ROAD, LARA GREATER AVALON EMPLOYMENT PRECINCT SUBMISSION**

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proUrban, Advisory, Planning & Management ('proUrban') act on behalf of ██████████, the contracted purchaser in relation to the land at 340 Plains Road, Lara ('the site').

██████████ purchased the site in early 2025 and with consent from 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 the Avalon Corridor Growth Area and is proximate to the Greater Avalon Employment Precinct (GAEP) and represents a logical inclusion into the broader employment precinct.

██████████ 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 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 within proximity to the GAEP North and shares many of its strategic advantages 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 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 **Environmental Significance Overlay – Schedule 4 ('ES04')**.

The current zoning of the land within the FZ, primarily encourages agricultural and farming-related uses. The 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 purpose of the FZ is to preserve land for agricultural purposes, there is a 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.

There is no relevant planning history associated with the subject land.

## Site Context and Surrounding Area

The subject site comprises an irregularly shaped parcel of land with a total area of approximately 58.64 hectares. The property benefits from a primary frontage to Plains Road along its northern boundary, as well as a direct interface to the railway line to the northwest. The site represents a fragmented parcel of farmland, that is small in scale and combined with the railway and residential interfaces is not conducive to productive agricultural use.

The site is well located in proximity to the Old Melbourne Road, Princes Freeway and Public Acquisition Overlay – Schedule 14 (PAO14) identified for the future airport rail link. This strategic positioning provides the site with convenient access to key regional transport corridors, enhancing its suitability for employment and industrial based uses.



Figure 1 | Subject site (Source: Landchecker)

The surrounding area consists of a mix of residential, agricultural and commercial/industrial land uses which reflect the evolving nature of the precinct. Directly to the south and west, the site adjoins commercial nurseries, which include a number of sheds and greenhouses. Further to the south and west the area is characterised by a mix of low density residential properties within the Rural Living Zone (RLZ).

The area includes a number of commercial enterprises including nurseries and pet boarding. To the north and east, the surrounding area is predominantly farmland, with a mix of other uses including the Avalon Raceway and Sycle materials recycling facility, which specialises in the processing of construction and demolition materials, which contribute to the area's semi-rural yet evolving character. 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.

## **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 (Economic development - 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.

Although the site is not explicitly zoned for industrial use, its position in proximity to major transport corridors and adjoining the existing rail line strongly aligns with the MSS objective of directing industrial development toward areas supported by key infrastructure. In addition, the site is in proximity to the future rail corridor identified by the Public Acquisition Overlay on the land at 375 Plains Road, Lara, which is intended to support the expansion of Avalon Airport. Infrastructure of this scale will require additional industrial land beyond the current GAEP North and West areas to accommodate future airport-related growth. In this context, the site enhances both the diversity and overall supply of industrial land in the region, supporting the broader policy aim of ensuring adequate industrial land to meet emerging and long-term industry needs.

Clause 14.01-1L-01 of the Geelong Planning Scheme, seeks to preserve the productive agricultural capacity of the land and where possible enhance the environmental condition of the land. As noted above, the site is not considered to be productive agricultural land.

### 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 340 Plains 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.
- 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 GAEP, 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 appropriately consider the future land use potential of the land at 340 Plains Road, Lara and does not include it within any designated industrial precinct boundary. Noting the scale and location



of the subject site in proximity to residentially zoned land, this omission risks constraining the potential of the land for future employment land easily accessible to Lara's growing residential population. The site's location within the Avalon corridor, as identified within the Avalon Corridor Strategy, its alignment with the G21 Regional Growth Plan and Clause 02.03 and Clause 02.07 of the Greater Geelong Planning Scheme, demonstrate the sites strategic alignment and appropriateness for accommodating coordinated industrial and employment growth.

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

- The draft amendment C477ggee establishes future employment and industrial precincts but does not explicitly recognise or test the inclusion of larger, strategically located parcels already identified in earlier planning as integral to the Avalon Corridor, such as the subject site. The site is located in a pocket of land bound by the railway to the north, Princes Freeway to the south and residential areas of Lara to west. This pocket will be further contained once the Avalon Rail Link connection to the east is realised. The small size of the site and rail and residential interfaces make the site un conducive to productive agricultural use and instead, the site represents a logical extension of the Avalon Airport employment precinct. Despite the FZ zoning, the pocket already contains a variety of industrial and commercial land uses including a materials recycling facility, raceway and commercial scale nurseries. The omission of the site and adjoining land parcels is inconsistent with the Avalon Corridor Strategy's identification of the North Precinct as part of a coordinated employment and infrastructure node. The site represents a logical extension to the precinct and would enable additional industrial and employment opportunities in proximity to the residential areas of Lara.
- The amendment's precinct design approach appears to prioritise readily developable, contiguous industrial areas (such as GAEP West and airport-adjacent land) but gives insufficient weight to larger surrounding parcels that remain strategically vital to the long-term employment and logistics functions of the corridor. The site's scale, access, proximity to key transport connections (including the existing rail corridor and future rail alignments) and relatively unconstrained status compared to other land in the region (unaffected by significant flooding or designated Extractive Industries Interest Areas) make it complementary to the broader industrial and freight network. The site is of an appropriate scale, configuration and locational advantage to meaningfully contribute to future industrial and employment supply within GAEP. 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 340 Plains 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. As GAEP North has not progressed to draft amendment or public exhibition, there is ample opportunity at this stage to incorporate the land at 340 Plains Road within the precinct. The planning outcomes for GAEP North remain unfixed, and including the site now would appropriately recognise its strategic location and suitability for future employment purposes.

## Conclusion

For the above reasons we submit that the land at 340 Plains 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 Greater Avalon Employment Precinct in further detail. Should you have any further questions, please don't hesitate to contact the undersigned on [REDACTED] or via email at [REDACTED].

Yours sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]