



VNPA submission regarding
Greater Avalon Employment Precinct
November 2025 public consultation



18 December 2025



1. Executive summary

1.1. Who we are

The Victorian National Parks Association (VNPA) is one of Victoria's leading nature conservation organisations. It is an independent, non-profit, membership-based group, which for 70 years has existed to protect Victoria's unique natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

1.2. Key messages

1.2.1. Impacts to MNES and state-significant values

- Numerous matters of international, national and state significance will be impacted by any development within GEAP. At a minimum:

International: The Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site.

Between the Avalon Saltworks and the Western Treatment Plant is one of Australia's richest saltmarshes. Its flora is of national significance. It is the best development of dry saltmarsh and the largest area of *Teticornia halocnemoides* marsh in coastal Victoria. Significant plant species include brittle greenhood and tiny arrowgrass.

National: Natural Temperate Grassland of the Victorian Volcanic Plain, Grassy Eucalypt Woodland of the Victorian Volcanic Plain, Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains, Spiny Rice-flower, Blue-winged Parrot, Curlew Sandpiper, Common Greenshank, Sharp-tailed Sandpiper, Double-banded Plover, Growling Grass Frog, Golden Sun Moth. The site is also significant for the Orange-bellied Parrot as winter habitat, and there are breeding colonies of the Fairy Tern and Pied Cormorant.

State: Western (Basalt) Plains Grassland Community, Western Basalt Plains (River Red Gum) Grassy Woodland, Saltmarsh, Tussock Skink, Fat-tailed Dunnart, Little Eagle.

1.2.2. Poor sequencing

- The development of the draft amendment C477ggee to the Greater Geelong Planning Scheme is premature.
- It is important to resolve the extent of impacts to environmental matters and how to avoid, mitigate and minimise these impacts across the whole of the precinct prior to proceeding further with the PSP process, any planning panels and any approvals by the Victorian Minister for Planning.
- To that end an Environmental Effects Statement or a Strategic Assessment would be the most appropriate mechanism for determining appropriate outcomes. This should happen prior to planning amendments being finalised.
- Any development in the precinct will in any case require a referral under the EPBC Act, which will inevitably lead to an EES given the very high conservation values being threatened.

- The best planning pathway is to engage in discussions with DCCEEW and to determine the appropriate federal process to undertake prior to progressing the PSP.
- This precinct needs an EES, not planning amendments, rezoning and the removal of the ESO.

1.2.3. Undermining confidence in good planning and environmental governance

- It is very questionable for this PSP process to be opening the door to floodplain development that will not only directly impact coastal and Ramsar wetlands but severely restrict their capacity to adapt to climate change.
- Confidence in this planning process has been significantly undermined by the revision of the planning pathway for GEAP, which only contributes to a sense of a rushed and somewhat secretive pro-development approach by government.
- Why is the state government rushing such a high-risk planning proposal?
- It appears the precautionary principle has been abandoned.
- The logic behind DEECA's declassification of the Cheetham Salt Works as wetlands is poor and subject to legal challenge. Given we have wetlands of international significance that are former saltworks and that are protected as such by international conventions, it seems illogical to have conceded to developers the wetland status of land proposed to be developed in GAEP. VPA's proceeding with the PSP given the risk that a legal challenge poses is irresponsible.

1.2.4. Climate change risk

- Any development that impacts potential sea level rise migration, or removes saltmarsh, is unacceptable. Both these are likely to happen.

1.2.5. Too much uncertainty, questionable data

- Major uncertainties exist that put into question the viability of the GAEP to deliver good planning outcomes.
- Issues are being ignored or deferred to post-PSP decision-making processes ill-suited to the scale, policy implications and complexity under consideration.
 - For example, while the DPO may specify that such matters as water quality targets must be met, there is a real risk that it will be the City of Greater Geelong that determines the acceptability of the Drainage Scheme, which in this case should be a matter for state or federal consideration, not for an LGA.
 - The DPO includes a key objective to ensure development does not adversely impact existing Ramsar wetlands to the south, as well as the Avalon Coastal Reserve and existing biodiversity values within the development area. But, again, who will monitor this and ensure compliance and adaptive management? It is naïve to think any developer will, and equally naïve to think that the City of Greater Geelong has the will and capacity to undertake this.
- The third catchment below Avalon Airport, in the south-eastern portion of the west side of GAEP, has not been modelled at all.

- Much hydrological data in the HARC report has only been extrapolated from historic data. The quality of this report needs independent verification.
- Little solid information is provided on what various water quality treatment levels and flow rates will have on the wetlands and the bay, including its seagrass. We have no information on how localised impacts will be. This uncertainty is recognised in the HARC report.
- The Cheetham Saltworks salt pans are undergoing environmental succession towards having excellent environmental values. Their future quality if given sensitive management has been completely ignored.
- We do not have a clear understanding of all the environmental values present. Surveys have been insufficient.
- A great deal of data relevant to making good environmental and planning decisions is outstanding in this documentation.
- The Flora and Fauna survey is inadequate and flawed.
 - The consultants failed to find the known Growling Grass Frog population or even a single plant species of state significance.
 - The Biosis report on 75-95 Avalon Road found Grassy Eucalypt Woodland of the Victorian Volcanic Plain and Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains, both of which the E&H Flora and Fauna Assessment claims are not present.
 - No information was provided on the extent of the known Fat-tailed Dunnart population.
 - Former site assessments relied on by the consultants were in some cases conducted at inappropriate times of year or included provisos that detailed site assessments still needed to occur.
- Key documents are not available for public scrutiny, e.g.
 - The Avalon Coastal Reserve Conservation Action Plan
 - The survey of 75-95 Avalon Road by Biosis, 2023

1.2.6. Insufficient, poorly-frames public consultation

- Public consultation has been inadequate and has not framed the major issues appropriately. There is a feeling in the community that business interests are succeeding in doing deals behind closed doors, when the outcomes of those deals will have irreversible impacts on environmental matters of international importance.
- No independent environmental organisations have been asked to contribute to this process to date.

1.2.7. Major unanswered questions

- Three underlying questions need to be further investigated and given appropriate airing in the public domain before approval of this PSP.
 1. Is it in our long-term interests to fill-in the Cheetham Salt works in the western portion of GAEP, given their functional ecological significance now and in a future beset by climate change?
 2. Is it even possible to have development in the western portion of GAEP, which is a floodplain, that would not have unacceptable impacts to either the Ramsar and other wetland systems or to the seagrass meadows and associated ecologies of the immediate coastal waters?
 3. Should Avalon Airport expand given the clear conflict between the need for air safety and the international significance of the Ramsar and other wetland systems that surround it on three sides? Bluntly, is this an airport in the right place? Is it even possible for Avalon Airport to expand given the constrained nature of its surrounding context. And even if it can expand, can it expand enough to meet the strategic goals it is claimed will follow from its expansion?

1.2.8. The drainage technical papers fail to acknowledge high priority threats to the Ramsar wetland

- The project is proposed within the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site. A major gap in the documents is they lack recognition of major high priority threats. The drainage technical study by HARC acknowledges some high priority threats, however it leaves out 'Toxicants from catchment inflows and stormwater', which is specifically mentioned in the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site Management Plan (Table 5, page 14) as being a high threat.
- The drainage reports fail to mention any impact on other Ramsar site values such as migratory birds and the impact from drainage works on these important values.

1.2.9. Light on marine ecological information and Ramsar values

- Generally, the reports are light on assessment of impact on marine ecological values within and outside the Ramsar site. The impact that the outfalls would have on migratory and shorebirds is a gap. The planning amendment should not proceed without thorough assessment.