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22 December 2025

Doc No: D25-613003
Our Ref: PRJ-21-240

Dear [REDACTED],

Re: Council submission to the Greater Avalon Employment Precinct engagement

The City of Greater Geelong is pleased to provide a submission to Planning Scheme Amendment C477ggee. We would like to acknowledge all the work done by the VPA to progress the Greater Avalon Employment Precinct and the collaborative approach taken.

There is high level support for the precinct objectives to create a significant employment precinct while ensuring areas of ecological value are protected. The precinct is located in a highly complex and sensitive environment, and these characteristics pose considerable challenges when trying to plan for future industrial development.

However, after thorough review, the City cannot support the amendment as exhibited. We maintain that the Minister for Planning should serve as the Responsible Authority for all approvals within the GAEP, with the City acting as a referral agency. This approach will ensure effective resourcing and coordination throughout the approvals process.

Our submission highlights several unresolved issues that must be addressed prior to rezoning. Many of the concerns have been raised consistently by council officers. The draft development plan requires substantial further work. Completing these tasks upfront will streamline subsequent approvals. Additionally, the City seeks greater clarity regarding the delivery and long-term management of stormwater and conservation assets likely to be vested to Council. Support for the amendment is contingent upon effective mitigation and management of identified environmental, financial, and social risks.

In summary, the City considers it premature to rezone the land without resolving these matters. Proceeding without a clear approval pathway poses significant risks to all stakeholders. We welcome continued collaboration with the VPA to address the issues outlined in our submission.

If you require further information please contact [REDACTED]
[REDACTED]
[REDACTED]
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Yours sincerely,

[REDACTED]
[REDACTED]
Manager Planning and Growth
City of Greater Geelong
[REDACTED]
[REDACTED]

Attachment: City of Greater Geelong Submission to GAEP amendment C477

Copy to:

Mayor and Councillors

██████████, Interim Executive Director Placemaking, City of Greater Geelong

██████████, Acting Executive Director City Infrastructure, City of Greater Geelong

██████████, Manager Planning and Growth, City of Greater Geelong

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██████████, Manager City Development, City of Greater Geelong

SUBMISSION



Greater Avalon Employment Precinct

City of Greater Geelong

Submission to Planning Scheme Amendment C477ggee

Date: 22 December 2025

SUBMISSION



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1 Executive Summary

The City is pleased to provide this submission to Planning Scheme Amendment C477ggee. The City acknowledges and appreciates the collaborative approach taken by the VPA/DTP. Regular meetings, the opportunity to provide feedback on drafts and attendance at the conclave sessions has ensured stakeholder's expertise and feedback have been communicated.

The City notes most of the issues raised in this submission have been previously identified. We refer to correspondence provided on 28/08/2024, 25/03/2025, 16/05/2025 and 11/12/2025. A summary of this submission is set out below:

The City:

- Provides in principle support to the strategic direction of the GAEP as a significant precinct, that can deliver major investment and employment to the State of Victoria.
- Requests the Minister to be the Responsible Authority (RA) for the Precinct, including for Development Plan (DP) approval and future permit applications of all types, with Council as referral authority.
- Requests that given the environmental intricacies and complexities of the area, the following outstanding issues be resolved prior to the amendment progressing (rather than being deferred to the Development Plan approval or permit process):
 - i. Completion of an Integrated Water Management Plan and additional stormwater assessments.
 - ii. Revised Native Vegetation Precinct Plan (NVPP) and biodiversity reports to identify all conservation reserves, and further investigation into drainage flow paths and stormwater, with zone selection reconsidered on this basis.
 - iii. The development of appropriate agreement mechanisms (e.g. Heads of Agreement/Section 173's), to ensure effective mechanisms can be developed that will govern infrastructure maintenance and management of conservation areas appropriately manage risk to Council.
- Requests appropriate consideration be given to how the significant environmental, economic and social risks associated with the development will be managed, including how future infrastructure is maintained and managed by Council and landowners.

It should be an ambition to simplify the DPO schedule to enable the further simplification of the Development Plan and future permits to efficiently deliver coordinated development of this precinct.

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2 STRATEGIC SUPPORT

The City supports the strategic justification for the amendment.

The Lara Structure Plan 2011 supported 'investigations into the opportunities and constraints on land adjoining the airport' (now the west precinct of GAEP).

The Avalon Corridor Strategy was adopted by the City of Greater Geelong and the City of Wyndham in late 2022. Both Councils wrote to the Minister for Planning on 14th February 2023 to request the Department of Transport and Planning (DTP) prepare and lead the amendment to implement the final strategy into the planning policy framework of each respective planning scheme.

In November 2024 the City provided feedback to DTP on the draft policy to introduce the strategy into the planning schemes. As at the time of writing, the Avalon Corridor Strategy is yet to be implemented into the planning scheme. This strategy should be implemented prior to a decision on this amendment.

The City's draft Industrial Land Supply Review (draft 2025) identifies a need for additional industrial zoned land in the municipality of which GAEP could contribute.

The City's Economic Development team support the findings of the *Greater Avalon Employment Precinct Economic & Scoping Study and Planning Framework* prepared by SGS Economics & Planning. In particular, the:

- provision of varied lot sizes (2–15 and 5–20 hectares) to meet operator needs.
- incorporation of sustainable design principles, circular economy opportunities, and adequate utility capacity, including grid readiness for electric fleets.
- limiting of retail uses to avoid competition with existing centres, consistent with the City's Retail Strategy 2020–2036.
- recognition of data centres as a growth industry, requiring robust power and water infrastructure.
- importance of limiting non-compatible uses to preserve the industrial focus of the precinct.

In 2025 the City identified the Avalon Airport Precinct as a [priority project](#) with state and federal funding identified to deliver the precinct.

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3 RESPONSIBLE AUTHORITY DELEGATION

The City requested the Minister for Planning assume the role of Responsible Authority (RA) for both Development Plan approvals and subsequent planning permit applications for the GAEP area in a letter dated 28 August 2025. It subsequently requested (3 September 2025) this extends to permit applications lodged prior to the approval of a Development Plan.

On 10 October 2025 the Department confirmed that the Victorian State Government will assume responsibility for Development Plan (cl 72.01-2) requirements (cl 43.04-4) and permit applications under Clause 53.22 (Significant Economic Development) of the Greater Geelong Planning Scheme for GAEP West. However, this does not extend to other permits outside the scope of Clause 53.22.

The City welcomes the Minister assuming responsibility for clause 43.04-4, in relation to Schedule 50 to the Development Plan Overlay (Greater Avalon Employment Precinct West).

Clause 53.22 enables, but does not require, planning permit applications to be made to the Minister for Planning (rather than the local council). It seems that the cost thresholds for the Minister taking responsibility for permits will translate to more City led processes.

The Minister, through DTP, is best placed to resource and coordinate the approvals processes which include several state and federal departments.

The City requires additional changes to clause 72.01 to specify:

'The Minister for Planning is the responsible authority for the land at Map 2 (Greater Avalon Employment Precinct Framework Plan).'

[insert the Framework Plan as Map 2].

If the Minister is the RA for precinct, clause 66.04 - Referral of permit applications should be amended under local provisions to add the Greater Geelong City Council as a recommending referral authority for an application to subdivide, use or to construct a building or construct or carry out works.

RECOMMENDATION

1. Amend clause 72.01-2 to include the Minister as the Responsible Authority for the Framework Plan Area.
2. Amend clause 66.04 to include the Greater Geelong City Council as a referral authority.

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4 BACKGROUND / TECHNICAL REPORTS

The City appreciates the opportunity it has had to review many briefs and draft reports that have been prepared and provide feedback. The City however requests that all technical work relied upon for the amendment is made available for review prior to the amendment progressing.

The City notes several technical reports refer to reports prepared by the developer. These reports are not available to view in full and do not form part of the amendment. The full context of these reports, including methodology, is required to understand if the conclusions and recommendations that they draw can be supported. There have also been numerous report revisions, and it has not always been clear why changes have been made or what they are based on.

RECOMMENDATION

1. Make available all background documents to all parties to ensure transparency and full sharing of information.
2. Provide advice on report versions and changes to assist understanding of rationale for changes.

5 DETAILED ORDINANCE REVIEW

GAEP Policy

The precinct policy, 11.03-6L-06 Greater Avalon Employment Precinct is supported subject to the following changes to the Framework Plan map:

- Change the hatching over the 'potential industry' area to differentiate it from 'industry', they currently have the same or very similar colouring.
- Add 'indicative' to the conservation reserve.
- Reference vegetation areas, subject to further work – refer to DPO Plan 1 comments.

RECOMMENDATION

1. Amend the Framework Plan map as per the above.

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6 ZONING

The City supports the use of industrial zones to facilitate employment uses in the precinct. If the identified further work is not completed, the City recommends the entire precinct being zoned industrial (no use of the Rural Conservation Zone at this time). The conservation areas should be rezoned when all the conservation areas have been identified and the relationship between stormwater management, conservation and open space is understood, and ongoing management and ownership responsibilities are clear.

The City is not satisfied the area proposed to be zoned RCZ accurately reflects the ultimate conservation area(s). The City does not want to lock-in this expectation when the biodiversity technical work and NVPP make it clear there are moderate and high value biodiversity and habitat areas beyond what is captured in the scope of the NVPP. See appendix 2 for further information.

Once all the conservation areas have been strategically identified and confirmed through the DPO requirements (including how they relate to drainage and open space reserves) they can be rezoned. The Rural Conservation Zone is appropriate if the reserves are retained in private ownership (with an ESO). If reserves are handed over to Council, they can be rezoned to Public Conservation and Resource Zone. This is consistent with the PSP approach and the use of the UGZ, with land rezoned once land use/areas are confirmed.

Greater consideration should be given to the interface treatments between the residential uses in the rural living zone (RLZ) and farming zone (FZ) and the proposed industrial precinct. This could be via the use of zones, overlays or open space.

If our recommendation is not supported, the RCZ schedule (35.06-16) should be updated to provide more detail about the conservation values in line with other schedules under the zone.

RECOMMENDATION

1. Rezone the entire precinct to industrial.

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2. Provide additional guidance in the DPO or DDO to provide greater clarity around the residential/farming/industrial interface (see DPO and DDO sections).
3. Ensure rural living interface is appropriate – if required, consider lighter industrial zone (I3Z) as a buffer, with reference to PPN92: Managing buffers for land use compatibility.
4. The zoning map greater-geelong-c477ggee-003znmaps19-20-27-28 should include the northern section of Gillets Road in the RCZ as per the southern section, if this zone is pursued (not recommended).

7 DEVELOPMENT PLAN OVERLAY

Whilst the City would have preferred a PSP approach that would have ensured less complexity in the DP approval process, and/or further work being undertaken prior to the amendment progressing to simplify the DPO requirements, the City accepts that the VPA has determined to utilise the DPO conditions and requirements in this draft amendment to address information gaps in technical reports so far prepared.

Due to the complex and sensitive nature of the site, the City believes all the work identified in the DPO as drafted by the VPA is required to mitigate the social, environmental and financial risks to the City as a potential future asset owner and manager and does not support removal of any conditions or requirements contained within the DPO unless further work is undertaken prior to the amendment progressing.

Alongside the wording changes identified in appendix 1, map changes are also identified in the recommendations under section 10 - Further work before progressing amendment.

RECOMMENDATION

1. Revise DPO schedule in accordance with Appendix 1 to improve clarity, readability and better reflect information contained in background reports.
2. Alternatively, complete all technical work prior to the amendment, enabling a simplification of the DPO schedule.
5. Show areas on DPO Plan 1:
 - Indicative conservation reserve, subject to further work

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- Vegetation high retention priority area, subject to further work
- Vegetation retain if possible area, subject to further work

8 OPEN SPACE CONTRIBUTION

The City requires an open space contribution of 5% unencumbered (unless otherwise negotiated) to be inserted into the clause 53.02 Public Open Space Contribution and Subdivision schedule. The Armstrong Creek Urban Growth Area – North East Industrial Precinct requirement was 3.1% and is significantly smaller in area (70 hectares developable area). The GAEP is isolated from the nearest township and therefore existing open space cannot be relied upon for future workers in the precinct.

Recreation/open space areas must be excluded from any conservation areas and located in land nominated for industry unless otherwise agreed by the Greater Geelong City Council. Open space (and drainage) reserves should be utilised as buffers to conservation and residential areas where possible.

RECOMMENDATION

1. Amend Clause 53.02 Public Open Space Contribution and Subdivision schedule to nominate a 5% unencumbered open space contribution requirement for the precinct.

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9 DESIGN AND DEVELOPMENT OVERLAY

The City is generally supportive of the DDO schedule and its conditions and requirements subject to the recommendations below.

RECOMMENDATION

1. Add design objectives under 1.0:
 - To ensure adequate interfaces and buffers are provided to adjoining residential and farming areas and conservation areas to minimise adverse amenity and environmental impacts.
 - To ensure development responds to the operational and safety requirements of an airport-adjacent environment.
2. Amend Buildings and Works 2.0 Site Layout and Design which currently includes: *'Ensure front setback of new buildings are consistent with the setbacks of existing buildings in the area and set aside for landscaping and car parking.'* This could be difficult when development is first commencing. Building setbacks should be specified (see DDO18). Generous setbacks should be provided to buildings that front Avalon Road adjacent to the residential area to provide an adequate interface/buffer. Setbacks should also be considered to buffer development that adjoins conservation areas.
3. Amend Buildings and Works 2.0 Car Parking and Access – *'Incorporate landscaped island beds if more than 10 car spaces are provided to separate the hard surface area and improve visual amenity [add: including the provision of canopy trees.]'*
4. Amend Buildings and works 2.0 Building Design:

'Buildings and works (including a television antenna and a flagpole) must not exceed the height of the most recent approved Obstacle Limitation Surface (OLS) or Procedures for Air Navigational Services - Aircraft Operations (PANS-OPS) surface prepared for an airport in accordance with the Commonwealth Airports (Protection of Airspace) Regulations 1996 or a [add: as] shown in the Avalon Airport Masterplan.'
5. In relation to the above, consider referencing the maximum height (to trigger a referral) and provide guidance to developers on preferred heights to avoid interference with aircraft

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operations. Consider Avalon Airport (like Melbourne Airport) being a recommending or determining authority.

6. Amend Buildings and works 2.0 Building Design: *Larger buildings address bulk and massing through using a range of building [add: modulation], materials, [add: roof forms], finishes and colours.*
7. Amend Buildings and works 2.0 Building Design: *Lighting in proximity to Avalon Road is designed to be baffled to prevent light spill and glare to dwellings on the west side of Avalon Road [add: and conservation reserves in accordance with National Light Pollution Guidelines for Wildlife and EPBC policy statement 3.21].*
8. Amend Buildings and works 2.0 Landscaping to include landscape buffers (as an example refer DDO18 Geelong Rong Road Employment Precinct). This will ensure a consistent landscape treatments within the precinct.
9. Amend Buildings and works 2.0 Landscaping: *To assist in minimising headlight glare to the dwellings on the west side of Avalon Road [add: and conservation areas] where possible.*
10. Amend Buildings and Works 2.0 Sustainable Design requirement to the following:
 - Best practice Environmentally Sustainable Development provisions that ~~encourage~~ [require]:
 - i. Measures that reduce the urban heat island effect.
 - ii. Material re-use and recycling (use of materials with reduced embodied energy).
 - iii. Renewable energy generation and battery storage.
 - iv. Electric vehicle charging.
 - v. Increased pervious surfaces to allow for the filtration and retention of water to support establishment of vegetation.
11. Add requirement under 3.0 Subdivision - provide a road frontage to open space and conservation reserves.

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10 FURTHER WORK PRIOR TO AMENDMENT PROGRESSING

Drainage and interface issues

Appendix 1 (DPO - Table of Recommended Changes) and Appendix 2 (Biodiversity and NVPP Feedback) provide detailed review of relevant documents, and make suggestions for how stormwater, drainage, drainage reserve, buffers, conservation areas, the NVPP and flow paths should be considered and reflected in the DPO and zoning before the amendment progresses. We also draw your attention to Attachment 1 (Drainage Authority letter) which outlines several key concerns in relation to stormwater management for the precinct.

Further to the detail at Appendix 1 and 2, it is also noted that:

- The City does not support DPO Plan 1 showing the drainage flow path on the northern part of the precinct terminating at Dandos Road opposite the conservation reserve. The City does not support any drainage assets (including basins, channels, underground pipes etc.) south of Dandos Road within the conservation area (indicative). The flow path for drainage south of Dandos Road needs to be shown as being within the industrial area. The exhibited HARC report's Figure 1: Proposed MAB major drainage layout shows significant drainage infrastructure south of Dandos Road in the proposed conservation area and not the industrial area, which is concerning.
- The DPO Plan 1 shows a 25m linear reserve at the northern end of the precinct along the eastern boundary. The purpose of this reserve is not clear and should be confirmed. The City requires a (minimum) 25m linear reserve is provided along Avalon Road to provide an appropriate interface and buffer between the residential/farming and industrial uses.
- The preference for a linear reserve along Avalon Road was raised in previous open space advice. It was recommended the residential/industrial interface comprise of a linear reserve consisting of a separated shared path incorporating landscaping (including canopy trees), path, landscaping. This path would form part of a loop trail around the precinct and connect to local parks. This solution combined with some built form requirements under the DDO would contribute to an appropriate buffer to residential and farming properties.
- All interface hatching on the DPO Plan 1 should be amended so it is shown on the subject land.

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- The City has consistently raised concerns around the stormwater management for this site.

There is currently a limited understanding on:

- The legal point of discharge
- RAMSAR impacts and approvals
- How changes to hydrology will impact the ecology of the area
- The impact of sea level rise
- The complexity of the stormwater scheme required to address these issues and the ongoing cost and environmental risks associated with the management and maintenance of such a scheme.

The City has experienced many of these challenges as part of the Sparrovale stormwater management system and wants to mitigate against similar risks posed by this precinct (see appendix 2 for more information).

- The City requires additional stormwater assessments to be carried out prior to the land being rezoned. This will provide greater certainty around the potential impacts. Amendment C453 - Lara Business Park (which is significantly smaller in scale compared to GAEP) included a 'Limeburners Bay Ramsar Wetland Impact Assessment Report' and a 'Stormwater Management Strategy' to inform and support the rezoning. In this case, similar reports are included as a DPO requirement and will not be prepared until after the land is rezoned.

Conservation Areas and the Native Vegetation Precinct Plan

The City has consistently raised concerns in relation to biodiversity and environmental matters.

These are explained in detail at Appendix 2.

A key issue is the adequacy of the Biodiversity and NVPP technical reports. A detailed assessment of these reports is provided in Appendix 2. The City does not believe these reports meet the standards required to support the amendment.

- The biodiversity report does not adequately explain survey areas and methodology, includes conclusions based on other consultant's work (which has not been made available) and contains conclusions that are not supported by evidence.
- The NVPP areas are unclear due to the scale of the maps.

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- The NVPP offset statement does not demonstrate offsets are available for species specific offsets.
- The NVPP timeframe of 15 years is not appropriate given the dynamic natures of the EVC's (such as saltmarsh and plains grasslands). DEECA guidance notes that a 15-year timeframe may unreasonably prevent changes in circumstances being considered.
- The NVPP does not meet the guidelines as it does not quantify the indirect impacts from hydrology changes, infrastructure and service provision and edge effects. The avoid, minimise or offset requirements in the native vegetation regulations cannot be met without understanding these impacts. The native vegetation impact is likely to be far greater than the NVPP states for this reason.

It is premature to 'lock- in' conservation reserves by rezoning some land to RCZ prior to DPO requirements such as conservation, stormwater and open space requirements being approved. Other state and federal approvals are also required. Unless the further work recommended is undertaken, the City's preference is to zone the whole precinct industrial with indicative conservation reserves and high/moderate value areas shown, to be determined subject to further work. See appendix 2 for more information.

The final configuration of the reserve/s should consider their establishment and future management. Ideally, reserves should be 'squared off' to consider practical matters such as fencing, mowing and the layout of future lots, open spaces or roads that abut the reserve and whether these are practical.

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RECOMMENDATION

1. Drainage reserves/infrastructure must be excluded from any indicative conservation reserves and only located in land nominated for industry.
2. The areas required for drainage, open space and conservation should be rezoned to Public Park and Recreation Zone and Public Conservation and Resource Zone (if they are to become Council assets) following the approval of the Development Plan and remain in the industrial zone in the meantime.
3. Recreation/open space areas should be excluded from any conservation areas and located in land nominated for industry unless otherwise agreed by the Greater Geelong City Council.
4. Confirm and include the drainage flow path south of Dandos Road on DPO Plan 1, preferably to a known discharge point.
5. Complete additional stormwater and Ramsar impact assessments to inform the DPO. This work should allow the DPO to be simplified and streamline future approvals.
6. Update the Flood Impact and Risk Assessment to include 10%, 1%, 0.5% with climate change to the year 2100 for SSP3-7.0.
7. Confirm the purpose of the 25m linear reserve alongside Gillets Road.
8. Include a 25m linear reserve (minimum) along the Avalon Road frontage on DPO Plan 1 to provide an appropriate residential and rural interface/buffer and to provide for a landscaped off-road shared path.
9. Add the off-road active transport corridor strategic cycling route identified in the Background Report (pg 75) taken from the Strategic Cycling Corridors (DTP, 2020) on DPO Plan 1.
10. Update the Transport Infrastructure Contributions Agreement to include reference to municipal roads, the Strategic Cycling Corridor and Avalon Road shared path.
11. Reconsider the configuration of the reserve so future land abutting the reserve and the reserve itself can be practically used and maintained.
12. Amend the reserve where it abuts Dandos Road so it aligns across the road.
13. Amend the ESD Assessment requirement wording – refer Appendix 1.
14. Include an ESD Assessment permit condition – refer Appendix 1.

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15. Amend DPO sections 3 and 4 in accordance with Appendix 1 to include Open Space Contributions (3.0) and an Open Space and Landscape Masterplan (4.0).
16. Update the Biodiversity Assessment to address the matters raised in Appendix 2.
17. Update the NVPP to address the matters raised in Appendix 2.
18. Update the DPO in accordance with the other proposed changes identified in appendix 1 and 2.

11 HEADS OF AGREEMENT CONTENT

The City seeks further work to be undertaken on the heads of agreement, including the content and purpose of the agreement prior to the amendment progressing. This will ensure clarity in responsibilities, maintenance obligations and risk for both Council and private landowners.

The City seeks clarity around the use of the section 173 agreements. Proponent led amendment applications submitted to the City are required to prepare a Shared Infrastructure Funding Plan (SIFP). Section 173 agreements are then linked to the delivery of the SIFP. In this case there is no understanding of the items and costs and what is shared (including apportionment) and what would be standard developer works.

Leaving these matters to the permit stage without linking them to a Shared Infrastructure Funding Plan risks inconsistencies across permits/landowners. These agreements are also voluntary which creates financial and legal risk to the City.

It is not clear from the amendment if the proposed conservation areas will be handed over to the City and under what circumstances and conditions. The reserve areas are significant (256 hectares) and based on recommendations in the NVPP, additional areas may be identified following additional work under the DPO (noting the City's preference for all reserves to be identified prior to rezoning). Under City administered amendments, reserves would be vested to Council at subdivision permit stage subject to conditions being met.

There are likely to be ongoing costs for the City associated with stormwater and environmental asset management of the waterways and conservation reserves. Given the complex nature of the precinct, the City is concerned the rates generated from any development will not adequately meet these

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costs. This is a significant financial and environmental risk to the City. The City is keen to explore mechanisms to reduce this risk.

There is potential for legal agreements to address some the City's concerns in relation to future asset ownership and ongoing management. The City is keen to explore these options with the state and the developers prior to the approval of an amendment.

RECOMMENDATION

1. Undertake further work on the Heads of Agreement or other forms of agreement prior to progressing the amendment.

12 CONCLUSION

While the City supports the strategic directions for the precinct, the rezoning is premature. Our concerns relate primarily to process, our role as the Responsible Authority, and information gaps. Further information is important to ensure the environmental, stormwater and transport uncertainties are clarified before this amendment moves forward. Our lack of insight into our future obligations as drainage authority, land manager and potential Responsible Authority are still not appropriately addressed by the draft Amendment.

We encourage this submission to be read in conjunction with the detailed appendices.

Appendix 1: Development Plan Overlay - Table of Recommended Changes

Legend:

~~Red/Red with strikethrough~~ = proposed deletion

Blue = proposed addition/change

Blue Highlight = All the provisions highlighted should be placed under Site Master Plan section of DPO

SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY		
	Section	Recommendation
1.0	<p>Objectives</p> <p>To facilitate the coordinated sustainable development of the Greater Avalon Employment Precinct West.</p> <p>To ensure development does not prejudice or conflict with the ongoing operation of the Avalon Airport and provides an appropriate interface to sensitive uses outside of the development area.</p> <p>To ensure development does not adversely impact existing Ramsar Wetlands to the south, Avalon Coastal Reserve and existing biodiversity values within the development area.</p> <p>To facilitate provide a high amenity industrial precinct supported by essential infrastructure, ancillary services, and a high-quality usable open space network for workers and visitors</p>	
2.0	<p>Requirement before a permit is granted</p> <p>A permit may be granted to subdivide land or construct a building or carry out works before a development plan has been prepared to the satisfaction of the responsible authority, for the following:</p> <ul style="list-style-type: none"> Subdivision of the land to realign property boundaries, or create a road, or create or remove easements. Minor works required for physical infrastructure or utilities to service the land. 	<p>Sub-clause 2.0 gains its power from the parent clause 43.04-2: <i>A permit must not be granted to use or subdivide land, construct a building or construct or carry out works until a development plan has been prepared to the satisfaction of the responsible authority.</i> <i>This does not apply if a schedule to this overlay specifically states that a permit may be granted before a development plan has been prepared to the satisfaction of the responsible authority.</i></p> <p>The purpose of this section is to allow minor buildings and works that logically should be permitted before a DP is approved. If these permits are to be issued by Council (which is not the City's preference) this should not</p>

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> • Extensions or alterations to an existing building or works associated with an existing residential use. • Extensions or alterations to an existing building or works associated with an existing use that will not prejudice the preparation of a development plan for the site. • Before granting a permit, the responsible authority must be satisfied that the permit will not prejudice: • the preparation of a development plan; and • the future use or development of the land in an integrated and orderly manner in accordance with Plan 1 to this schedule and the operation of the State transport system. 	<p>be confused with the 'responsible authority' (i.e. the Minister) for approving the DP under DPO50.</p> <p>In the context of the DPO50 drafting, reference to 'responsible authority' should be clarified.</p> <p>Remove ability for subdivision prior to development plan and the SIFP (or similar) being approved/issued. Minor changes to existing lots allowable but subdivision is the trigger for payment of levies; levies cannot be calculated/collected until the SIFP has been approved.</p>
	<p>Infrastructure Contributions Agreement</p> <p>Unless otherwise agreed to by the responsible authority, a permit must not be granted to subdivide or develop land until an agreement under Section 173 of the Planning and Environment Act 1987 has been entered into between the owner of the land and the Greater Geelong City Council which specifies the nature and amount of any infrastructure contributions. The agreement must be informed by the approved Development Plan and must specify:</p> <ul style="list-style-type: none"> ▪ Net developable area for each property. ▪ Development catchment areas (if applicable). ▪ Methodology of levies calculated. 	<p>Listing the agreement under Sub-clause 2.0 is not appropriate and should be moved to Sub-clause 3.0. It does not comply with the Ministerial Direction on the form and content of planning schemes.</p> <p>The agreement should not be entered into until the DP has been approved because the DP is needed to inform the terms of the agreement.</p> <p>As currently drafted, the provision can be interpreted to mean that the agreement will be (or can be) entered into before a DP is approved.</p> <p>New heading required under 4.0 Requirements for development plan to include the preparation of an Infrastructure Contributions Plan.</p>

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> ▪ Infrastructure items to be included as shared infrastructure, including relevant triggers or staging based on advice of technical reports. ▪ Itemised costings of the shared infrastructure items. ▪ Responsible delivery agency of the shared infrastructure items. ▪ Details of the future ownership and management arrangements for any shared infrastructure items. ▪ Operational and administrative provisions. <p>The owner will pay all costs and expenses of, and incidental to, the execution and recording of the agreement.</p>	
	<p>Transport Infrastructure Contributions Agreement Transport Shared Infrastructure Funding Agreements.</p> <p>Unless otherwise agreed to by the responsible authority and Head, Transport for Victoria, a permit must not be granted to subdivide or develop land until an agreement under Section 173 of the Planning and Environment Act 1987 has been entered into between the owner of the land, the Greater Geelong City Council and the Head, Transport for Victoria, for the delivery by the developer and / or landowner, at its cost of Transport Infrastructure items between the Greater Avalon Employment Precinct West and the external road network servicing the use and development.</p>	<p>As above. Move to sub-clause 3.0 and re-word to Transport – Shared Infrastructure Funding Agreements.</p>

SUBMISSION



SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p>The agreement must be informed by the approved Development Plan and must specify:</p> <ul style="list-style-type: none"> • The scope of work and location of infrastructure items required as a result of the development, including any land provision or acquisition. • The expected timing of provision of each infrastructure item and who is responsible for delivery. • The cost of any items that are the subject of financial contributions rather than direct delivery by the owner. • The equitable apportionment of costs between the developer, Council and Head, Transport for Victoria for any items which exceed the needs of the development. • Operational and administrative provisions. The agreement will apply to the following infrastructure items: • Upgrades to the Avalon Road and Princes Freeway interchange. • Construction of a new intersection on Avalon Road to provide access into the Greater Avalon Employment Precinct. • Any upgrades to Avalon Road and other municipal roads to facilitate the increased traffic volumes associated with providing access into and egress out of the Greater Avalon Employment Precinct. • Strategic Cycling Corridor and Avalon Road shared path, including the McClelland Avenue section to Lara Station. 	

SUBMISSION



SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	The owner will pay all costs and expenses of, and incidental to, the execution and recording of the agreement.	
3.0	<p>Conditions and requirements for permits</p> <p>The following conditions and/or requirements apply to permits:</p> <p>A permit must contain conditions or requirements which give effect to the provisions and requirements of an approved Development Plan</p>	<p>Add:</p> <p>Infrastructure Contributions Agreement</p> <p>Transport Infrastructure Contributions Agreement</p>
	<p>Drainage and stormwater management</p> <p>A permit to subdivide land or to undertake works (other than vegetation removal) must include a condition that requires a stormwater management plan be prepared that implements the recommendations identified in the Integrated Water Management Plan (prepared under Clause 4.0 of this Schedule), to the satisfaction of the drainage authority. The plan must include:</p> <ul style="list-style-type: none"> • Consideration of the drainage requirements of any upstream and downstream landholders. • Any proposed works (including interim works) and their operational and maintenance arrangements, - An agreed schedule and cost apportionment for maintenance of drainage and water quality assets. • Assessment of the risks of adverse impact on receiving waters and environment with regard to stormwater volume and water quality. 	

SUBMISSION



SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> • Detailed civil construction plans. • Development of lots must be outside the 1% Annual Exceedance Probability (AEP) flood extent for riverine flooding and coastal flooding (with consideration for climate change scenarios as recommended by the Corangamite Catchment Management Authority). 	
	<p>New: Open Space Contribution</p> <p><i>Unless a contribution has already been made under any other provision of the scheme, any development of land (whether or not it is subdivided) must make an open space contribution equal to 5% (unencumbered) unless otherwise agreed, not in a conservation reserve of the net developable land (unencumbered) or in lieu cash payment or a combination of both subject to equalisation.</i></p> <p><i>Encumbered land for the purposes of the public open space contribution is land required for one or more of the following purposes:</i></p> <p>Stormwater drainage reserves (including retarding basins, wetlands, sediment ponds and associated sediment drying and access/maintenance areas as approved within the Integrated Water Management Plan inclusive of functional layout plan designs);</p> <ul style="list-style-type: none"> • <i>Any waterway corridor reserve which consists of the hydraulic width (1% AEP channel), riparian zone and vegetated buffer zone;</i> • <i>Land area required for conservation reserves;</i> 	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> • <i>Land area required for the protection of remnant vegetation and scattered native trees (to be transferred to Council as road or conservation reserve); and</i> • <i>Land set aside in Aboriginal cultural heritage reserves.</i> <p><i>Encumbered Land is not to be credited for the purposes of the open space contribution.</i></p>	
	<p><i>New: Environmentally Sustainable Development</i></p> <p><i>Any permit for the subdivision of land must include within it a condition that provides that, prior to the certification of the plan of subdivision, it must be demonstrated to the satisfaction of the Responsible Authority how any relevant Environmentally Sustainable Development Assessment that is approved as part of any approved Development Plan for that land will be given effect.</i></p>	
	<p>New: Shared Infrastructure Funding Agreements</p> <p>Unless otherwise agreed to by the City of Greater Geelong, a permit must not be granted to subdivide or develop land until an agreement under Section 173 of the Planning and Environment Act 1987 has been entered into between the owner of the land and the City of Greater Geelong which specifies:</p> <ul style="list-style-type: none"> • Net developable area for each property (within the permit). 	<p><i>Previously Infrastructure Contributions Agreement in 2.0.</i></p>

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> Levies payable. Applicable shared infrastructure items to be delivered (by the landowner within the permit area), including relevant triggers or staging based on advice of technical reports. Itemised costings of the applicable shared infrastructure items. Operational and administrative provisions. The owner will pay all costs and expenses of, and incidental to, the execution and recording of the agreement. <p>Note: Infrastructure consists of on and off-site infrastructure for drainage, waterways and waterbodies, conservation and other public open space areas and improvements, off-road shared user paths and trails, and associated land as necessary. It does not include shared transport infrastructure and associated land, or service infrastructure delivered by developers</p>	
4.0	<p>Requirements for development plan</p> <p>The development plan must be generally in accordance with Plan 1 and be prepared to the satisfaction of the responsible authority and in consultation with the City of Greater Geelong, and include:</p> <p>A site analysis plan that identifies the key attributes and constraints of the land its context, the surrounding area and its relationship with existing and proposed uses on adjoining land which includes an accurate description of:</p>	<p><i>This section should clarify several aspects of the preparation, assessment and approval of the DP as follows:</i></p> <p>The Development Plan must be generally in accordance with Plan 1 to this Schedule.</p> <p>Only one Development Plan may be prepared for all the land applied with DPO50.</p>

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> – Topographical, landscape features and any other relevant elements, as informed by a feature and level survey and a digital surface model. – Views to and from the site. – Provision of services to the land. – Flood mapping and analysis for all events up to and including the 1% AEP for climate change (including potential coastal inundation from sea level rise and combined effects of tides, storm surges, coastal processes and local conditions such as topography and geology) or as determined by the floodplain management authority. – Surrounding land uses and movement network. 	<p>The Minister for Planning is the responsible authority for the approval of the Development Plan. In deciding whether the Development Plan should be approved, the responsible authority must consider the views of, as relevant:</p> <ul style="list-style-type: none"> ▪ Greater Geelong City Council ▪ Head, Transport for Victoria ▪ Department of Energy, Environment and Climate Action ▪ Corangamite Catchment Management Authority ▪ Country Fire Authority ▪ Environment Protection Authority ▪ Parks Victoria ▪ Barwon Region Water Corporation ▪ The Minister administering the Pipelines Act <p>Any plan forming part of the Development Plan that requires Greater Geelong City Council to be the asset owner and manager (such as for road, drainage, conservation and open space reserves), must be prepared to the satisfaction of Council before the Development Plan is approved by the responsible authority.</p> <p>The Development Plan must include the following requirements:</p>
	<p>A site master plan that includes:</p> <ul style="list-style-type: none"> – Land uses that reflect the land uses and interface area shown in Plan 1. – An open space network that where feasible practical provides for the retention of high and moderate value trees (as identified in Arboricultural Assessment and Report (Tree Logic, September 2023) identified outside of conservation reserves. and the retention of native vegetation 	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p>consistent with Greater Avalon Employment West Native Vegetation Precinct Plan.</p> <ul style="list-style-type: none"> – A concept plan with indicative locations of key roads, drainage reserves, habitat conservation areas/reserves, public parks, distribution of land uses and interface treatments. – An indicative movement network, including public and active transport, bus stop locations, road layout, and any intersection treatments required (as determined by a Traffic Impact Assessment). – Cross-section details of roads. - Details of the extent and location of cut and fill to occur across the site, including site levels. – Proposed design responses at key interfaces and along key view lines. – Details of proposed treatments to manage sensitive interfaces between residential and industrial land uses including widths of any buffer areas, planting species list and their future ownership and management. A minimum 25 metre linear reserve should be provided on the eastern side of Avalon Road. – Details of how walking and cycling infrastructure integrates with the surrounding existing and planned active transport network. – Provision for integrated water management, consistent with the Integrated Water Management Plan recommendations. – Provision for stormwater and drainage management, consistent with the Drainage and Stormwater Management Strategy. – Any necessary infrastructure required to service the development, including any water sensitive urban design measures. 	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> – Buffer areas and procedures to protect any areas of Aboriginal cultural values in accordance with the recommendations of a Cultural Values Assessment. – Identification of bushfire hazard areas and relevant setbacks. – Provisions for land to be set aside for a Victoria State Emergency Services facility and a fire services facility generally in accordance with the locations shown in Plan 1. – Any recommendations or requirements in the Avalon Airport Impact Assessment Report prepared under this schedule and including but not limited to: – The configuration of any Protected Airspace applicable to the environs of the Avalon Airport, consistent with the Avalon Airport Impact Assessment Report. × Recommended maximum heights for buildings and landscaping located within Protected Airspace as it extends to ground level, to ensure the obstacle limitation surface (OLS) and Procedures for Air Navigational Services – Aircraft Operations (PANS-OPS) is not penetrated, as recommended in the Avalon Airport Impact Assessment Report. – A staging plan of the subdivision, buildings and works. 	
	<p>A Site Servicing Report that addresses the infrastructure and utilities servicing requirements for the precinct. Where the need for above-ground utilities (such as electricity substations, sewer pump stations, telecommunications facilities and overhead powerlines) is identified, the</p>	<p>The biodiversity assessment and NVPP were not integrated with servicing report. External works to service GAEP not included in NVPP or impact assessments. Details in appendix 2.</p>

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	Section	Recommendation
	<p>report must provide indicative locations for these to inform the future subdivision layout.</p> <p>Details of how site serving impacts the Biodiversity and NVPP assessment (on-site and offsite) and whether any amendments need to be made.</p>	
	<p>An Integrated Water Management Plan prepared to the satisfaction of the responsible authority and Corangamite Catchment Management Authority and in consultation with, Parks Victoria, Barwon Water, the Department of Energy, Environment and Climate Action and City of Greater Geelong that includes: - A concept design for an integrated water management system, with particular emphasis on: × The treatment, discharge, storage and reuse of stormwater (as per the Drainage and Stormwater Management Strategy). × The potential to store, treat and reuse wastewater. × The approach to offsetting the use of potable water. × Considerations of the full water cycle and merits of possible options. - The approach to eliminating or mitigating identified risks on receiving waters and environment with regard to stormwater volume and water quality - Future ownership and responsibility for the long term maintenance and management of stormwater and wastewater storage and reuse infrastructure. - Details of how the harvesting and reuse of stormwater and treated wastewater will be appropriately managed, as required by the relevant authority.</p> <p>- Appropriate links to the Drainage and Stormwater Management Strategy.</p>	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p>A Drainage and Stormwater Management Strategy, prepared to the satisfaction of Corangamite Catchment Management Authority and Greater Geelong City Council and in consultation with Parks Victoria, Barwon Water and the Department of Energy, Environment and Climate Action that includes:</p> <ul style="list-style-type: none"> – A concept design for an integrated water management system, with particular emphasis on: – The treatment, discharge, storage and reuse of stormwater, including an approach to managing the impact of stormwater on the ecological needs of the onsite and downstream receiving environment. – Details of any stormwater detention basins, including the location, asset reserve area, sections, and approximate volume and surface area. – Location of stormwater discharge points (outfall) including determination of the appropriate discharge quantity and water quality treatment requirements to manage the risk of adverse impact on environmental values to the Avalon Coastal Reserve, Hovells Creek and Ramsar site. – Proposed co-location of harvesting, water quality and detention assets adjacent to the conservation area. <p>Management of upstream flows to maintain the hydrological regime in the existing watercourse.</p> <ul style="list-style-type: none"> – Details on the potential impact of filling the land, or increasing impervious surfaces on groundwater hydrology and the impact on 	<p>The plan must address the limitations in the Existing Conditions Flood Modelling Report by Alluvium, 31 May 2024 including:</p> <ul style="list-style-type: none"> – Address the limitations applied to the Western treatment Plant and Lara Flood Model – Survey the GAEP to create a current comprehensive Digital surface model including the 791ha excluded from the two models report and external works required through transport needs including the Avalon link. – Produce new a flood model/s of the catchments based on the current and developed topography for current rainfall intensities and 2100 rainfall intensities. – Show Hazard, depth, velocity, water surface elevations, and total energy level. – Include sea level rise mapping and analysis based on Updated Sea-level projections for Victoria CSIRO November 2024 to 2120 – Utilise current 2025 Hovells Creek flood model; parameters, climate change factors and developed conditions assumptions. – Provide emphasis for asset and environmental impacts on 2120 scenario asset renewal for protection from inundation, abandonment of impacted assets and migration of habitat. <p>The plan must address the limitations in the Greater Avalon Employment Precinct – West Position Paper 03 by HARC, November 2025 defining additional common strategic objectives including;</p> <ul style="list-style-type: none"> – Required design rainfall intensities

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	Section	Recommendation
	<p>groundwater dependant aquatic and terrestrial ecosystems and how these will be mitigated.</p> <ul style="list-style-type: none"> Existing ground water table levels, water quality and influence on underground asset design <p>Consideration of the priority areas volume reduction as contained in the Urban Stormwater Management Guidance (Environment Protection Authority, 2021).</p> <ul style="list-style-type: none"> The impacts of sea level rise and climate change including for whole of asset life cycle 80+ years using rainfall intensity SSP3 2100. A drainage management strategy section that includes consideration of: A slope analysis and direction of major and minor overland flowpaths, including consideration of any future earthworks on the site. The agreed points of discharge/s for the site for major and minor drainage and the approach to manage or convey existing upstream flows. Details of the downstream biodiversity values (Avalon Coastal Reserve and the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar site) and the potential impacts from the proposal. <p>Integration of drainage works with upstream and downstream land, including any required maintenance plan.</p> <ul style="list-style-type: none"> A Flood Impact and Risk Assessment to the satisfaction of the Corangamite Catchment Management Authority and the Greater Geelong City Council that includes flood mapping and analysis for all 	<ul style="list-style-type: none"> Annual exceedance of major and minor storm events for infrastructure design Model selection in line with ARR2019 Modelling technique in line with ARR 2019 Connections to existing roads and footpath networks, including identifying and possible scale of the WSUD at the proposed locations Bathometry survey of outfall to Corio Bay Inclusion of works to enable outfall/s hydraulic requirements as part Parks Victoria land management and maintenance agreement Council Stormwater systems will be gravity controlled at grades that allow self-cleaning and not requires pumps or mechanical management. <p>Jacobs report identifies presence of PFAS within the Airport which has the potential to impact on land and water quality within the GAEP. The scope did not include testing of surface waters (noted as the likely primary migration pathway for PFAS) which represents a data gap. Recommend that this data gap is addressed specifically in the DPO schedule.</p>

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	Section	Recommendation
	<p>events up to and including the 0.5%, 1% and 10% AEP under future climate change to the year 2100 for SSP3-7.0.</p> <ul style="list-style-type: none"> – Flood modelling and analysis report extending to Corio Bay, detailing hydraulic mapping all frequent and infrequent rainfall events including; climate change factors SSP5 2100, coastal inundation from sea level rise and combined effects of tides, storm surges, coastal processes, and rare events including PMF, or as determined by the floodplain management authority. – Detailed investigation and risk assessment of the impact of the proposed works on environmental values of the receiving waters, Avalon Coastal Reserve and Ramsar wetland values, particularly seagrass. <p>This should include consideration of the advice in the Environmental Reference Standard for Geelong Arm and the Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site Management Plan Summary (Department of Environment, Land, Water and Planning, 2018 and future climate conditions).</p> <ul style="list-style-type: none"> – Details on the existing freshwater flow regime and modelling to demonstrate that any proposed onsite system will provide adequate protection of downstream values and maintain the existing freshwater flows to the Avalon Coastal Reserve. – Details of any storage basins associated with the harvesting and reuse of stormwater, including the location, sections, and approximate volume and surface area. – Water sensitive urban design (WSUD) stormwater management measures to maintain water quality and environmental flows. 	

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	Section	Recommendation
	<ul style="list-style-type: none"> – Future ownership and responsibility for the long term maintenance and management of stormwater and reuse infrastructure. – Demonstration of how a future drainage scheme considers the requirements of the Avalon Coastal Reserve and has no adverse impact on existing Ramsar wetlands – Management of birdstrike risk on Avalon Airport operations associated with stormwater quality treatment measures, particularly those that utilise permanent standing water. - Details of the upstream freshwater flows versus the coastal influence of Port Phillip Bay on the existing waterway along the western boundary (see Plan 1) which contains sensitive high value saltmarsh habitat so an appropriate water management regime can be implemented to retain and enhance this habitat. – Details of the appropriate outfall location(s) for the site to minimise impacts on Ramsar values including avoiding impacts on the intertidal reefs within the Point Wilson / Limeburner's Bay. Site selection should be based on existing conditions at the selected locations as well as consideration of future climate conditions in which sea level rise may alter the values and change the hydrology conditions. – Details of the existing waterway values including the values associated with the different channels and how the water management regime will maintain these values. – Details of groundwater levels and its salinity on the site and how the potential impacts on drainage and stormwater assets and interaction with surface runoff will be managed. 	

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	Section	Recommendation
	<ul style="list-style-type: none"> – Demonstration that PFAS testing of surface waters has concluded no contamination or levels that will not impact on land and water quality. – The plan must be guided by the Greater Avalon Employment Precinct – West Position Paper 03 by HARC, November 2025 and Existing Conditions Flood Modelling Report by Alluvium, 31 May 2024 and include reference to: – WSUD Engineering Procedures: Stormwater CSIRO Publishing 2005. – Clause 56.07 of the Greater Geelong Planning Scheme. – The Infrastructure Design Manual and associated Design Notes (City of Greater Geelong Design Notes). – Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site Management Plan. – The Avalon Coastal Reserve Conservation Action Plan, Parks Victoria (or subsequent version). – Environment Protection Authority guidelines for best practice sedimentation and pollution control measures for waterways and wetlands 	
	<p>A Drainage and Conservation Area Asset Management Plan to the satisfaction of Greater Geelong City Council that includes details of drainage assets and conservation reserves, including where these assets are proposed to be privately owned and managed.</p>	

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	Section	Recommendation
	<p>An Integrated Transport Management Plan prepared to the satisfaction of the responsible authority, Greater Geelong City Council and Head, Transport for Victoria and that includes:</p> <ul style="list-style-type: none"> – An assessment of traffic generation and the impact on the adjoining road network, including consideration of impacts to the State transport system, Avalon Airport Master Plan 2015 (or subsequent version) and development of the north precinct. – Identification of any upgrade work required on the adjoining road network, including the State transport system, including the staging of any works. – Conceptual traffic access plans and cross-sections, showing all proposed new or upgraded intersections, crossovers and street frontages. – Identification of a bus capable road network including integration with the broader public transport network. – Identification of the active transport network including pedestrian and cycling links and access improvements including both internal and external connections – Consideration of operation of the road network during events such as the Avalon Airshow. 	
	<p>A Staging Plan that includes: The proposed provision, staging and timing of the various development plan projects requirements including:</p>	

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	Section	Recommendation
	<ul style="list-style-type: none"> – stormwater drainage works in accordance with the approved Drainage and Stormwater Strategy and Integrated Water Management Plan. – reticulated water, sewerage, gas and any other infrastructure, linked to stages of development. – road and intersection upgrades in accordance with the approved Integrated Transport Management Plan. – open space and conservation areas. – the identification of any agency or person responsible for provision of particular items of infrastructure. – the indicative development commencement location and direction of the development pattern across the precinct. – a provision that any out-of-sequence development can only be supported by negotiation and agreement between a developer and the impacted infrastructure providers and not impose unreasonable additional burden on infrastructure providers. 	
	A Geotechnical Report including details of the fill to be placed on the site.	
	<p>A precinct wide Coastal Acid Sulfate Soil Management Plan (CASSMP) be prepared by a suitably qualified and experienced practitioner, to the satisfaction of Greater Geelong City Council.</p> <p>Such a person is a professionally accredited soil scientist or a person with five or more years recognised experience in acid sulfate soil assessment and management.</p>	

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	Section	Recommendation
	<p>The CASSMP should include:</p> <ul style="list-style-type: none"> – An overview of the physical characteristics and environmental attributes of the site. – Detailed CASS mapping including the vertical and spatial distribution of CASS onsite and offsite with chemical testing results and interpretations. – Overview of proposed works including detailed descriptions of any dewatering and drainage works, any soil excavations, delineation of geological lenses and horizons that may affect dewatering, plans for temporary above ground storage of CASS and plans for reuse/disposal of CASS. – A description of the management strategies that will be used to minimise impacts from the oxidation of sulphides including the possibility of redesigning layout of the excavations to limit oxidation (e.g. avoid disturbing CASS materials, minimising disturbance to groundwater, trenchless technology), planned treatment (in-situ or ex-situ liming) and containment strategies of CASS and leachate, water table management. – Details on how the planned management activities integrate with different components of the project including construction and other environmental management activities. – Performance criteria for monitoring the effectiveness of the CASS management strategies during construction. 	

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	Section	Recommendation
	<ul style="list-style-type: none"> – Monitoring program which includes proposed location of monitoring points and frequency of monitoring, details of sampling and analytical parameters and details of procedures to be undertaken in the event that monitoring indicates that thresholds are being exceeded. – Contingency procedures need to be developed as part of the CASSMP in order to manage impacts in the event of management strategies failure. <p>The CASSMP should generally align with:</p> <ul style="list-style-type: none"> – The Victorian Best Practice Guidelines for Assessing and Managing Coastal Acid Sulfate Soils (Victorian Government Department of Sustainability and Environment, October 2010); and × the National Acid Sulfate Soils Guidance (Water Quality Australia, 2018). 	
	<p>A precinct wide Sodic and Dispersive Soils Assessment and Management Plan prepared by a suitably qualified and experienced soil scientist, to the satisfaction of Greater Geelong City Council, that includes:</p> <ul style="list-style-type: none"> – Assessment of existing site conditions (topsoils and sub-soils), including assessment of the extent of sodic and dispersive soils (including laboratory analysis of Exchangeable Sodium Percentage and soil dispersion). <p>Sample locations should consider land gradient, erosion risk mapping, the extent of any existing erosion, landslip or other land degradation, potential surface water receptors and the proposed locations of surface water and stormwater features.</p>	

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	Section	Recommendation
	<ul style="list-style-type: none"> – Assessment of soils collected from the soil profile, including from the anticipated depth of excavations/land disturbance. – Soil assessment at a sufficient frequency to distinguish areas of low sodicity risk (if any) from areas that will require sodicity management and or further assessment. - Presentation of site-specific data which links soil and landscape characteristics to the sodic soil risks and the potential for sub-surface erosion (sub-surface structure decline). – Risk Assessment. Identification and assessment of risks of sodic and dispersive soils to the environment from proposed development activities (including but not limited to surface water and buildings and structures). If sodic soils are present, development of a Sodic and Dispersive Soils management plan is required including recommendations on: <ul style="list-style-type: none"> ○ Planning approaches to minimise disturbance and or risks from sodic soils at the precinct scale, with consideration of: <ul style="list-style-type: none"> ▪ Proposed staging of the precinct, ▪ Soil management practices (including fill) with consideration of anticipated sodic and dispersive soil exposure, ▪ Potential need for baseline assessment (i.e. baseline turbidity) of surface water features (where risk assessment indicates potential for impact to surface water features), ▪ Potential need for further soil assessment. ▪ Management and mitigation measures for potential erosion and dispersion risks. 	

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	Section	Recommendation
	<ul style="list-style-type: none"> Management of drainage (interim and permanent) during all stages of development (including run-off). Any post-construction monitoring and/or management requirements (soil and or water). Potential need for soil treatment and amelioration. Any treatment of soil proposed to be reused onsite or removed from the site. - Any training and supervisions processes proposed for construction contractors to ensure compliance with the sodic and dispersive soils management plan. Consider management requirements at the individual lot level which could be provided by the Greater Geelong City Council to inform landowners if their site contains potential sodic soils and outline their responsibilities for minimising disturbance and implementing mitigation measures. 	
	<p>A Bushfire Management Plan prepared in consultation with the relevant fire authority and Greater Geelong City Council that achieves development that is bushfire resilient for both the completed development and during any staging of the development.</p> <p>The Bushfire Management Plan must address the following requirements:</p> <ul style="list-style-type: none"> The provision of a perimeter road on all interfaces with a permanent bushfire hazard. Identification and mapping of setbacks from classified vegetation that will lead to exposure of radiant heat no greater than 12.5kW/m2. 	<p>Consider this as a permit requirement to apply to buildings and works permit, as this site is not covered by the BMO and these will not be captured if development occurs prior to subdivision.</p> <p>Included recommendations from the technical report.</p>

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	Section	Recommendation
	<ul style="list-style-type: none"> – Recommendations for any vegetation management requirements to achieve acceptable level of defendable space. – Identify areas where the bushfire hazard requires specific bushfire management measures for subdivision and building works to be implemented (such as static water supply requirements and bushfire emergency management plans). – Staging plans that demonstrate non-developed areas can be managed as low threat, excluding conservation land. – Ensure defendable space obligations are ruled out from being provided on conservation land. 	
	<p>An Open Space and Landscape Concept Plan, prepared to the satisfaction of Greater Geelong City Council that includes:</p> <ul style="list-style-type: none"> – An overall landscape master plan for the land in the Development Plan. – A survey of existing vegetation to be retained and/or removed, including an arborist assessment for the identification and assessment of trees within the precinct including tree species, health, structure, estimated lifespan, amenity value, retention value, tree retention zones and anticipated mature height of all vegetation. – Recommendations of how the retained trees and vegetation should be managed. – Details of the form and location of public parks and public urban squares distributed across the precinct to provide recreational and amenity benefits for precinct users. Any land reserved for such purpose must be configured to be usable open space (generally square or 	

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	Section	Recommendation
	<p>rectangular shape), sited on developable land, and vested in the Greater Geelong City Council at the subdivision stage.</p> <ul style="list-style-type: none"> – Details of any shared paths, bike paths or walking trails. – Details of likely impacts to native fauna resulting from the modification of land form and disturbance of surface soils and rocks. – Details of vegetation to be retained and recommendations for management and retention vegetation. – Details of how areas of biodiversity and conservation significance will be addressed including any proposed landscape buffers or treatments at the interface of the precinct and adjacent conservation areas. × – Details of understory flora, tree and shrub species suitable for planting within any Protected Airspace as it extends to ground level area applicable to the environs of the Avalon Airport, such that the anticipated mature height of plants must not exceed the height of any applicable Protected Airspace. <p>Trees and shrubs should be of local indigenous plant species relevant to the Ecological Vegetation Class (EVC) throughout the development area. ·</p> <p>Details of how vegetation will be ecologically restored consistent with local EVC characteristics to include habitat features such as stags, sock or hollow logs, - Details of irrigation systems provided to service proposed plantings.</p> <ul style="list-style-type: none"> – A written description of the management of all reserves, landscaping areas and water sensitive urban design treatments. 	

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	Section	Recommendation
	<ul style="list-style-type: none"> – Details of the interface and buffer treatments between industrial uses and the conservation and open space areas and land set aside for drainage purposes. – An assessment of the impact of the landscaping concept on airport safety including instruction into Protected Airspace and details on whether the landscaping concept will attract more birdlife to the area. 	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p>A Conservation Management Plan prepared by a suitably qualified consultant and in consultation with the Department of Energy, Environment and Climate Action and Greater Geelong City Council outlining vegetation management, fencing and access and pest plant and animal management, inclusive of:</p> <ul style="list-style-type: none"> – Identification of any areas to be retained outside of the Rural Conservation Zone. – Identification of the buffer zones required to conservation areas in accordance with EPBC Act Policy Statement 3.21 and other best practice recommendations. – Identification of corridors for Kangaroo mobility throughout the precinct and into the broader landscape. <p>Measures for the long-term conservation, and maintenance and enhancement of native vegetation and habitat values within the precinct.</p> <ul style="list-style-type: none"> – Details on how management of the land is compatible with the long-term conservation, and maintenance of native vegetation and habitat values within the precinct. – The avoidance and minimisation of destruction of habitat for native fauna resulting from the modification of land form and disturbance of surface soils and rocks. – Costing of conservation management plan, and a financial plan for execution of the conservation management plan. 	

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	<p>An Environmentally Sustainable Development (ESD) Assessment that includes:</p> <p>An assessment of the nature of the proposed development, and the site conditions which present opportunities or constraints for achieving sustainable design outcomes.</p> <p>A framework which identifies how the use and development of the land can achieve ESD outcomes in accordance with any relevant policies and strategies developed by the City of Greater Geelong and the Victorian Government.</p> <p>Add:</p> <p>An Environmentally Sustainable Development (ESD) Assessment that includes:</p> <p>An assessment of the nature of the proposed development, and the site conditions which present opportunities or constraints for achieving sustainable design outcomes.</p> <p>A framework which identifies how the subdivision, use and development of the land can achieve ESD outcomes in accordance with any relevant policies and strategies developed by the City of Greater Geelong and the Victorian Government, including but not limited to:</p> <p>Opportunities for the subdivision and infrastructure to minimise greenhouse gas emissions and encourage renewable energy generation.</p> <p>Opportunities to reduce greenhouse gas emission from the construction and ongoing operation of any buildings toward net zero.</p>	
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	<p>Opportunities for renewable energy and battery energy storage systems (BESS) to be maximised at precinct and lot scale.</p> <p>Encourage tree canopy coverage in the public realm including streets.'</p>	
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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p>Details of how areas of Aboriginal cultural values, as informed by a Cultural Values Assessment, are addressed within the precinct.</p> <p>Design guidelines that address the Greater Avalon Employment Precinct Landscape and Visual Impact Assessment Report.</p> <p>Details of how the development will treat the interfaces and respond to the key view lines as identified on Plan 1 and in the Greater Avalon Employment Precinct Landscape and Visual Impact Assessment Report.</p> <p>Details of how all foreseeable threats to existing gas and / or liquid hydrocarbons transmission pipelines subject to the Pipelines Act 2005 which may be affected by use and development of the precinct are identified and managed through protection measures in accordance with safety obligations of the Australian Standard A2885 Pipelines – Gas and liquid petroleum.</p> <p>Details of how all required existing and proposed utilities are provided for within the precinct and are consistent with the Site master plan and Landscape concept plan.</p> <p>Details of how the physical infrastructure meets City of Greater Geelong standards or if not defined, be subject to the approval of the responsible authority and be generally in accordance with the following:</p> <p>City of Greater Geelong Infrastructure Development Guidelines (IDG) 2010. - City of Greater Geelong adopted Infrastructure Design Manual (IDM) 2010.</p>	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p>Details of how areas of Aboriginal cultural values, as informed by a Cultural Values Assessment, are addressed within the precinct.</p> <p>Design guidelines that address the Greater Avalon Employment Precinct Landscape and Visual Impact Assessment Report.</p> <p>Details of how the development will treat the interfaces and respond to the key view lines as identified on Plan 1 and in the Greater Avalon Employment Precinct Landscape and Visual Impact Assessment Report.</p> <p>Details of how all foreseeable threats to existing gas and / or liquid hydrocarbons transmission pipelines subject to the Pipelines Act 2005 which may be affected by use and development of the precinct are identified and managed through protection measures in accordance with safety obligations of the Australian Standard A2885 Pipelines – Gas and liquid petroleum.</p> <p>Details of how all required existing and proposed utilities are provided for within the precinct and are consistent with the Site master plan and Landscape concept plan.</p> <p>Details of how the physical infrastructure meets City of Greater Geelong standards or if not defined, be subject to the approval of the responsible authority and be generally in accordance with the following:</p> <p>City of Greater Geelong Infrastructure Development Guidelines (IDG) 2010. - City of Greater Geelong adopted Infrastructure Design Manual (IDM) 2010.</p>	<p>All the provisions highlighted should be placed under Site Master Plan</p>

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<p><i>New: Open Space and Landscape Masterplan</i></p> <p><i>to the satisfaction of the City of Greater Geelong and includes:</i></p> <ul style="list-style-type: none"> <i>• Identification of all areas and location of public open space.</i> <i>• A Public Open Space Table showing the land size and the percentage of each land parcel that will be provided for unencumbered public open space contribution (5%).</i> <i>• Plans of all encumbered land reserves, identifying vegetation and fauna retention and management, re-establishment of local indigenous plant species, and any other rehabilitation works.</i> <i>• A tree canopy plan that demonstrates how the Plan Victoria tree canopy target of 30% (excluding areas dedicated to biodiversity, native vegetation conservation, and drainage assets) in the public realm will be met and which identifies the number and type of trees to be delivered.</i> <i>• Landscaping treatment concepts proposed to provide an attractive entrance to the precinct using local indigenous plant species where appropriate.</i> <i>• The provision of local parks that are configured to be usable space (generally square or 2:1 rectangular shape unless an alternative configuration is agreed by the City of Greater Geelong) and edged by roads or other reserve frontage.</i> <i>• The provision of a linear loop trail around the precinct connecting to local parks (co-location within drainage or conservation areas encouraged and a combination of separated shared paths located next to existing roads and dedicated shared trails preferred) with connections to the Lara Train Station and the Bay Trail considered.</i> 	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY

	Section	Recommendation
	<ul style="list-style-type: none"> • <i>All open space areas must be separated from industrial development by road frontages or other active interfaces such as pedestrian paths and/or a shared path.</i> • <i>Concept plans to the satisfaction of the City of Greater Geelong for each of the following:</i> <ul style="list-style-type: none"> ○ <i>Local parks.</i> ○ <i>Linear trails.</i> • <i>Parks should be located to maximise significant tree or biodiversity retention.</i> • <i>The required concept plans should show the general layout and indicative landscape treatments (such as paths, seating, lighting, drinking fountains, shading structures, play spaces and paving materials) in accordance with Council infrastructure standards, and the use of local indigenous plant species where appropriate. Utility kiosks/cabinets must not be located in any open space.</i> 	
	<p>New: Infrastructure Contributions Plan:</p> <p><i>to the satisfaction of the City of Greater Geelong and includes:</i></p> <ul style="list-style-type: none"> • <i>Net developable area for each property.</i> • <i>Development catchment areas (if applicable).</i> • <i>Methodology of levies calculated.</i> • <i>Infrastructure items to be included as shared infrastructure, including relevant triggers or staging based on advice of technical reports (note: includes transport).</i> 	

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY		
	Section	Recommendation
	<ul style="list-style-type: none"> • <i>Itemised costings of the shared infrastructure items.</i> • <i>Responsible delivery agency of the shared infrastructure items.</i> • <i>Details of the future ownership and management arrangements for any shared infrastructure items.</i> <i>Operational and administrative provisions.</i>	
	Relocated: Transport Shared Infrastructure Funding Agreements	Moved from 2.0

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SCHEDULE 50 TO CLAUSE 43.04 DEVELOPMENT PLAN OVERLAY		
	Section	Recommendation
	<p>In deciding whether the Development Plan is satisfactory the responsible authority must consider the views of:</p> <ul style="list-style-type: none"> ▪ Greater Geelong City Council ▪ Head, Transport for Victoria ▪ Department of Energy, Environment and Climate Action ▪ Corangamite Catchment Management Authority ▪ Parks Victoria ▪ The relevant water, drainage and sewerage authority 	<p>Relocated to start of 4.0</p>

Appendix 2: Biodiversity and NVPP Feedback

Executive Summary

This appendix provides a detailed overview of the exhibited information in the context of biodiversity and environmental considerations for the Greater Avalon Employment Precinct. It identifies critical gaps and risks to highlight issues with the proposal and seeks to confirm obligations for the protection of significant ecological values present. It is noted many of these issues were previously identified.

1. Key information gaps

- Stormwater Management: No viable outfall identified; hydrology constraints and downstream Ramsar wetlands are at risk of significant detrimental impacts.
- Indirect Impacts: Altered hydrology is likely to compromise retained native vegetation and saltmarsh ecosystems, including critical migratory bird habitat.
- Offset Availability: NVPP does not demonstrate species-specific offsets are achievable, rendering the plan non-compliant with native vegetation policy and unable to be approved in its current form.
- Artificial salt pans within GAEP form part of a nationally important shorebird wetland, this information is omitted from the exhibition.

2. Significant biodiversity values under threat

- Significant native grasslands, wetlands, and habitat for threatened species (e.g., Victorian Grassland Earless Dragon, Orange-bellied Parrot) are proposed for removal or inadequately assessed.
- Salt pans within GAEP are nationally important shorebird habitat, yet this is omitted from assessments.

3. Technical Reporting

- Incomplete biodiversity assessment - poorly justified conclusions, omission of key data, and lack of indirect impact analysis.
- High likelihood of Coastal Acid Sulphate Soils and sodic soils pose potentially catastrophic biodiversity risks if mobilised.

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- PFAS contamination risk not fully assessed; surface water migration pathway from Airport into precinct requires investigation.
- NVPP contains errors, unclear mapping, and unrealistic 15-year timeframe.
- Proposed conservation areas and buffer widths lack scientific basis.
- Planning Pathway Concerns
- DPO and DDO schedules fail to resolve conflicts between industrial development and biodiversity protection.
- The proposed Rural Conservation Zone and NVPP seek to provide certainty in terms of land use available for industry, yet the DPO requires additional avoidance of conservation values at a later stage. This creates a confusing planning pathway moving forwards, with unclear obligations for proponents and the RA.

4. Conclusion

The City requires the additional further work to be completed prior to the amendment progressing to demonstrate biodiversity objectives can be achieved:

- Identifying an outfall
- Quantifying indirect impacts (hydrology, servicing, transport).
- Revising the NVPP to ensure offset availability and correct errors.
- Appropriately demonstrating EPBC and FFG Act obligations, buffer zones, and adequately protected conservation areas.
- Demonstrating integrated water management and drainage strategies before rezoning.
- Align planning controls (DPO, DDO) with biodiversity objectives and providing a clear pathway forward for proponents and the RA.

Further work is required to demonstrate local, state, and federal policy or legislation has been complied with and biodiversity values will be protected. The exhibited amendment defers too much work to the Development Plan creating uncertainty for all parties. If the further work is undertaken, a refined DPO could be achieved by resolving several of the current knowledge gaps. Completing more work at the amendment phase will streamline future approval processes.

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Exhibited Documentation

Background report VPA November 2025

The overarching requirement relating to biodiversity within the background report states that precinct must address the protection of environmental and biodiversity values, including native grasslands and habitat for threatened species such as Victorian Grassland Earless Dragon (VGED). Further noting it must address protection of Ramsar wetlands, coastal saltmarsh and the Western Treatment Plant (WTP) from stormwater runoff from proposed development. These requirements conflict with the proposed land use and Native Vegetation Precinct Plan (NVPP) which seek the removal of significant areas of native grassland and habitat for threatened species. As all detail regarding stormwater is deferred to the Development Plan (including identifying an outfall) phase it is unclear if stormwater management is viable, or how altered hydrology may detrimentally impact the environment.

The report acknowledges flooding and water flow are significant constraints for the precinct to be addressed in “future drainage designs”. The work undertaken to date identifies significant biodiversity values downstream, along with valid constraints surrounding hydrology management, geotechnical issues, acid sulphate and sodic soils and land contamination. The *‘HARC work demonstrates... through coordinated planning between landowners, water quality treatment, volumetric flow control, and strategic outfall placement, the precinct can be developed while protecting environmental values’*. This conclusion is not justified with the constraints, errors and information gaps identified in this appendix. Demonstrating the land can drain is a critical factor in determining if land is suitable for a change in use.

Bushfire Development Report Terramatrix November 2025

Section 7.3.1 (areas of high biodiversity conservation values) states there are no apparent biodiversity impacts associated with the findings of the assessment.

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However, the report notes that if development is staged then non developed areas need to be managed as low threat. The report needs to specify should not apply to conservation land. Potential defendable space obligations on conservation land also need to be ruled out.

Land Capability Assessment Jacobs 09 April 2025 (Rev 6)

Acid Sulphate Soils

Jacobs identify a high likelihood of Coastal Acid Sulphate Soils (CASS) across the majority of the GAEPW area. When disturbed, CASS react with oxygen to form sulphuric acid. According to the Victorian Coastal Acid Sulphate Soils Strategy, this acid can trigger the release of other toxic elements (heavy metals and other contaminants) and when combined with acid kills plants and animals, contaminating water and food and corroding concrete and steel. The strategy notes development should be avoided in areas containing acid sulphate soils. It's important to highlight mobilisation of CASS in GAEP has the potential to have catastrophic impacts on biodiversity values of international significance within and downstream to the precinct. Strategies to address this risk are embedded in the draft DPO schedule, but these ignore the best way to avoid potential impacts resulting from CASS; to not disturb the soils.

Sodic Soils

Jacobs identify a high likelihood of sodic soils across much of the precinct. These are described as being susceptible to waterlogging and erosion because of their physical structure and chemical composition. Like potential CASS, risks increase when surface soils are removed, and subsoils are exposed. Mobilisation of sodic soils into conservation areas within and downstream of the precinct would result in detrimental biodiversity impacts. The further work identified in the DPO schedule addresses the need to adequately identify the presence of sodic soils and manage them, though the simplest way to eliminate the risk to waterways and habitat is to avoid mobilisation.

Contamination

Several properties are noted within the precinct as having potential for contamination and are appropriately addressed in the conditions in section 3.0 of the DPO schedule, with one exception. Jacobs note the confirmed presence of PFAS within the Airport which has the potential to impact on land and water quality within the GAEP. The scope did not include testing of surface waters (noted as

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the likely primary migration pathway for PFAS) which represents a data gap. Recommend that this data gap is addressed specifically in the DPO schedule.

PFAS migrating into proposed conservation areas and the downstream environs is a biodiversity risk not noted in the exhibited documentation. The City, as potential future land manager of conservation areas, notes this as a consideration that requires further work. This work may impact the viability of conservation reserves.

Groundwater and Groundwater Dependant Ecosystems

A shallow groundwater table is noted within the precinct, flowing generally north to south. Potential groundwater dependant aquatic and terrestrial ecosystems are identified in Figures 5-13 and 5-14 within and external to the precinct. These correspond broadly to proposed RCZ locations, though it is hard to be sure as the data is not included on any other map or report exhibited. The report notes that the primary recharge mechanism for local aquifers is to be via diffuse rainfall and surface infiltration, with shallow groundwater likely to contribute baseflow to surface waters. There is no analysis on the potential impact of filling the land, or increasing impervious surface, on groundwater related hydrology or groundwater dependant ecosystems.

This represents a data gap in exhibited documentation and results in uncertainty about the viability of potential groundwater dependant ecosystems proposed for retention within and external to the GAEP.

Strategic Transport Modelling Assessment Report – Jacobs No 3 Rev 004 5/11/2025

This report identifies key road upgrade requirements overtime, the NVPP doesn't attempt to consider these requirements. Additional impacts to biodiversity than described may result from upgrading these roads.

The key connection along Dandos road may impact biodiversity values noted for retention in conservation areas in Gillets Road and south of Dandos Road. Duplication or widening of this road is not discussed. From a biodiversity perspective it is recommended that Dandos Road terminate at Gillets Road so Gillets Road can be connected to the proposed reserve on the south side of Dandos Road (unlabelled in the NVPP).

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Utility Assessment Report – Spiire November 2025

The biodiversity assessment and NVPP are not integrated with proposed servicing strategy. External works to service GAEP not included in NVPP or impact assessments, include -

1. *Proposed sewer infrastructure from GAEP (across Hovells Creek per figure 5 or across conservation reserves per figure 6)*
2. *Potable water per figure 7 and 8*
3. *Electricity easements or substation (required land take unclear).*

Biodiversity impacts associated with servicing should be included in the NVPP to reduce the need for additional assessments and approvals in the future. Not including these requirements in the NVPP also results in biodiversity impacts being underrepresented.

Arboricultural Assessment and Report – Tree Logic Ref. 012925 15/09/2023 (pts 1-3)

The report does not utilise the updated Australian Standard, AS4970-2025, this doesn't result in an issue for this process but would note any future planning process would need to reference the amended standard, this should be referenced in section 4.0 of the development plan schedule.

The findings of the report are broadly supported, including recommendations to retain medium and high value trees. Additionally, it is recommended that opportunities are explored to retain trees along the east side of Avalon Road to retain habitat and assist in screening proposed development from existing dwellings on the West side of the road.

The report notes that established trees will be adversely impacted should adjoining wetlands drained and filled. This concern needs to be considered during the development plan and permit phases to ensure that tree retention is viable ongoing.

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Alluvium Existing Conditions Flood Modelling Report 31 May 2024. Deliverable 4

This report is labelled as deliverable 4/4 for the GAEP project. The City was provided with other deliverables by Alluvium (GAEP Existing Conditions Situational Analysis July 2024, by Alluvium and EcoFutures) for the project as a part of earlier consultation.

For transparency, the City believes the Alluvium work should have been exhibited with the amendment. This report has informed a number of the DPO requirements. The views within this report, while critical, discuss the scale of the issues required to be resolved along with the risks associated with developing the site. The key recommendation of this work was *“to resolve the conflict between future development and the Ramsar site. There is no single option that is preferred, and it is likely all options will cause significant ecological loss and impact. Resolution on whether the level of impact is deemed acceptable needs to be resolved prior to the investigation taking place. The outfall from the GAEP will be the key driver for the future strategy of the GAEP”*. The City does not support the rezoning prior to this conflict being resolved and the impacts being understood.

HARC position paper Rev 03 November 2025

This paper acknowledges this it is not a drainage strategy, nor does it identify an outfall or address issues previously identified by Alluvium.

The paper suggests that additional freshwater may be good for saltmarsh and the Avalon Coastal Reserve (ACR) without justification, inferring similarly that the risk of ‘too little or inappropriate water regimes in the salt pans’ identified by Parks Victoria means that increases to volume associated with development might be beneficial.

The paper considers volume reduction unnecessary south of Dandos Road without justification.

In section 2.2 (separation of flows) it notes that concern regarding changes to hydrology impacting the ACR are offset by the fact that climate change and sea level rise will inundate the reserve anyway. This view writes off the biodiversity values of both the ACR and the precinct, ignoring the potential role the precinct and ACR will play for migration of habitat inland as sea levels rise.

It notes that the Ramsar management plan does not indicate stormwater leading to decreased salinity and altered water regimes as a priority threat. That statement applies to existing conditions

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at the time the plan was written, it does not mean that altering water regimes will not become a threat in a changing or developing catchment.

Comparisons to other development requirements within the Paper are not useful and should not be used to justify a business-as-usual stormwater strategy in such a significant landscape, nor does the fact that the upstream catchment is large and developed.

The paper incorrectly notes there are no direct comparisons or examples that can be used for previous developments upstream of a Ramsar Site. The City can share its experience in the Armstrong Creek Growth area which is located upstream of the Lake Connewarre Ramsar Complex. Significant investment has occurred to divert additional stormwater from the Ramsar complex to maintain wetland complexity and habitat attributes present. Specifically, this resulted in the acquisition of the 500ha parcel at Sparrovale Wetlands. Similar saline dependant biodiversity values are present within the Sparrovale property, and the City has recorded over time the decline in biodiversity occurring within the land from increased freshwater inputs.

The paper notes that if the development was in a different location in the catchment (i.e. further upstream) it would not be subject to similar levels of scrutiny. Publicly available information can be provided on the Armstrong Creek and North and Western Growth area projects that talk to similar considerations of stormwater impacts downstream during strategic planning processes.

The Paper infers that Ramsar values are within the Ramsar spatial extent only. This approach fails to consider significant habitat for migratory birds present within the precinct and the ACR. Both these areas would be under threat by altered hydrology.

The wildlife management requirement to reduce wildlife strike for the airport set out in the paper conflict with conservation land use designation of waterway and saltpans. It is unclear how this conflict can be resolved.

Landscape and Visual Impact Assessment (LVIA) Report – Frank Hanson Urban Design September 2024

The LVIA relies on the Landscape Character Assessment (Hansen Partnership, 2021) prepared for the Avalon Corridor Strategy, to form the basis for its Landscape Character Areas. The Hansen assessment has not been exhibited but the Avalon Corridor Strategy summarises the key findings.

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From a biodiversity perspective there was no mention of the internationally significant landscape of the Corio Bay foreshore or the Ramsar site.

The exhibited LVIA briefly references the Ramsar Wetlands within the study area in Section 3.4 as part of the Physical Site Context section of the report. This section is limited to identifying the location, noting that they are of international significance for their diverse ecosystem and migratory shorebirds.

Section 4.7 notes that the Draft Existing Ecological Conditions for Greater Avalon Employment Precinct (EHP, 2024) highlights species diversity, native vegetation, wetlands, significant ecological communities, significant flora species and significant fauna species of the study area however does not include any maps to show the extent or locations. Whilst the recommendations further down in the report talk to retaining areas of native vegetation or high significant ecological value it is unclear how these have been incorporated into the Landscape Character Areas and the Visual Quality of the site. The landscape values assigned to the landscape character areas identified for the study area are:

- Agricultural Plains – Moderate value
- Airport – Low value
- Former Salt Works – Low value

Emphasis has been placed on retaining the sparse number of existing trees, and windrows, and their importance to the landscape character of the site, but not the existing grasslands/ecological values or how the development should respond to the Ramsar site or Avalon Coastal Reserve.

It is recommended that the LVIA is revised to consider the ecologically significant landscape elements as high value features of the area and provide guidance on how development should respond.

Biodiversity Assessment – EHP October 2025 Final V3

Older versions of the EHP report were provided to the City during previous consultation. Part of ongoing feedback to VPA was that the report had key gaps, incorrectly interpreted policy and underrepresented biodiversity values within and adjoining the precinct. The current version partially addresses some of these issues with the use of work undertaken by other ecology consultants (Biosis on behalf of MAB). Notably, while the conclusions of the Biosis work have been incorporated into the

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EHP work, the Biosis work is not exhibited. It is not possible to determine if the Biosis conclusions referenced are supported. The Biosis work should be provided as part of the amendment package given it has informed the DPO.

Issues previously identified include:

Section 1.1 Study Area

The report does not identify if road reserves within the precinct are included in the assessment. The NVPP is similarly unclear due to the spatial scale of the maps and the inclusion of some, but not all roads, in the NVPP area table 2.1.

It is important adjoining road reserves are included in biodiversity assessments and NVPPs for greenfield projects as these roads are typically required to be upgraded to facilitate development. Not accounting for adjoining roads and other ancillaries associated with the project results in poor biodiversity planning, resulting in additional impacts, permit obligations and associated delays during the permit phase.

Downstream biodiversity values have not been identified in the context of potential impacts from development. The values downstream of GAEP are significant, providing critical habitat of international importance within the Avalon Coastal Reserve and Port Phillip Bay (Western Shoreline) and Bellarine Peninsula Ramsar Site. Reference to the Ramsar site, along with the need to quantify stormwater impacts and changes to hydrology are discussed in section 7.2. This section also accurately notes that the 'saline environment creates foraging habitat for significant migratory and marine avian fauna, which is at risk of being compromised if the ecological character of the Ramsar Site is altered'. The finding is also applicable to saline dependant ecosystems in the Avalon Coastal Reserve and within GAEP.

Altering hydrology is identified as an indirect impact in the native vegetation regulations. Therefore, areas supporting native vegetation that are subject to altered hydrology must be assumed as lost. Areas nominated as being retained within the GAEP, along with downstream areas (not adequately assessed) are likely to be lost if development proceeds. For these reasons, impacts to native vegetation and habitat as described in the report are likely to be underrepresented and the report should be updated to consider indirect impacts.

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Section 2 Methods

The assessment should have included reference to the National Directory of Important Migratory Shorebird Habitat - [National Directory of Important Migratory Shorebird Habitat - DCCEEW](#) and EPBC Act Policy Statement 3.21 – Industry Guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species [EPBC Act Policy Statement 3.21 - Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species - DCCEEW](#).

Based on this work the conclusions regarding potential impacts to shorebirds and habitat made at section 3.6.4 should be updated to note the presence of ‘important habitat’ across the salt pan areas resulting in likely significant impacts and EPBC approval requirements under the legislative implications section of the report.

The assessment should note that the artificial salt pans within GAEP are defined as a wetland of national importance (Reference VIC121 Werribee-Avalon Area). Relative to the importance of this wetland to Victoria, *“the State’s small size and high population density places considerable pressure on coastal shorebird habitats.”* Intertidal areas near the City (of Melbourne) provide limited shorebird habitat with the exception of the Western Treatment Plant and Avalon Coastal Reserve. The Avalon Salt Works area is referenced as being part of the Key Biodiversity Area of Werribee and Avalon and noted as being *‘regularly used by shorebirds for ‘top-up’ foraging at high tide’*. It forms part of a broader ecosystem critical to migratory shorebirds which has supported aggregate shorebird numbers exceeding the numbers required to define the area as ‘important habitat’ under the EPBC Act.

Advice within Policy Statement 3.21 should be used to inform setbacks and buffer zones to areas supporting shorebird habitat. The Policy notes that to avoid disturbance to shorebirds the use of buffer zones is recommended with widths ranging between 165-255 metres. Buffers should be considered as part of the amendment.

Section 2.2.3 – Targeted Flora Studies

Seventeen listed species (5 EPBC and 12 FFG) were noted as having at least a moderate likelihood of occurrence with the study area. Targeted studies were undertaken for the 5 EPBC listed species,

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though areas subject to surveys are not shown, and it can't be determined if all potential habitat was considered.

The methodology for Matted Flax Lily notes that a reference site was checked for Spiny Rice Flower (SRF) as a part of the survey, though this is likely a copy paste error. EHP appear to rely heavily on surveys from Biosis (Biosis results not included). The SRF records included in Figure 2G appear to utilise data provided by the City.

The methodology for surveying State Listed plants is described at section 2.3.2.6, noting generally that surveys were undertaken as a part of habitat hectare assessments though not confirming what areas were surveyed or if survey timing aligned with timeframes allowing detectability.

The uncertainty resulting from unclear methodology and survey effort, along with the use of third-party conclusions in the report results in the findings for Listed Flora being unclear.

Section 2.3.3 Nationally Significant Fauna Surveys

Excluding Striped Legless Lizards (SLL), Golden Sun Moth (GSM) and Growling Grass Frog (GGF), it's unclear where surveys were undertaken or if all suitable habitat was considered. For the three species where survey locations are shown, it's also unclear why certain areas of native vegetation or potential habitat were excluded, or how the results have informed figure 8. Other matters that require consideration include –

- Areas of confirmed GSM habitat south of the waterway do not appear to be surveyed. If suitable habitat has been confirmed the area should have been included in the survey effort. The qualification regarding GSM at section 2.4.3 acknowledges that weather in the survey season resulted in suboptimal survey conditions. This qualification does not explain the approach shown in figure 8.
- Growling Grass Frog records and habitat aren't shown on any figure, though the NVPP references 'confirmed present in the EHP assessment in the central unnamed waterway'.
- Tussock Skink (TS) habitat is noted as aligning with that described for SLL but no habitat for SLL is shown in figure 8. Large areas of confirmed habitat for TS are located south of Dandos

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Road which have not been surveyed for SLL or subject to any other targeted survey. This also applies to the description of habitat for Fat-tailed Dunnart.

- SLL surveys have not been undertaken in accordance with published conservation advice.
- Locations of avifauna surveys are not shown.

It is unclear how EHP has determined the confirmed and potential habitat. There is uncertainty about the validity of survey effort, including why areas of potentially suitable habitat were excluded. This undermines the conclusions of the biodiversity assessment and introduces uncertainty regarding the assumptions that informed the approach to biodiversity planning in the precinct. Further information should be provided in the assessment.

Section 3 – Existing Ecological Conditions

The issues highlighted about the methodology and survey effort undermine the conclusions made in this section. It is not possible to support conclusions regarding species, habitat or community presence or absence due to this uncertainty.

Additional comments regarding conclusions for fauna and ecological communities are provided where these do not align with published conservation advice or cannot be justified based on the exhibited information.

Section 3.6.2.1 Victorian Grassland Earless Dragon

The conclusions in this section are mostly informed by a survey effort from Biosis (results not included in this assessment). The potential habitat description appears to align with the best available information, but this cannot be verified without provision of the Biosis report/s.

Section 3.6.2.3 Blue-winged Parrot (BWP) and Orange-bellied Parrot (OBP)

The survey confirms presence of approximately 40 BWP within the survey window, noting that the survey effort is unclear. OBP was not observed.

The conclusions for these two species have been combined, with EHP concluding that no habitat categorised as essential for survival of the species is located within the study area, though habitat is present within the broader landscape. The conclusion for both species appears to have been made

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from review of the conservation advice for the OBP only and is considered inaccurate. The two species need to be separated in the report.

The National Recovery Plan for OBP notes that throughout the non-breeding range the OBP requires a diversity of foraging opportunities, in saltmarshes, dunes and adjacent shrubby areas and weedy pastures, within 10km of the coast and 200m of coastal wetlands and waterbodies, but more than 2km from developed areas. At a minimum, all non-breeding locations occupied since 2000 are considered essential for the survival of the species. The restricted population size, along with paucity in records is not enough to exclude the significant areas of habitat for this species. Given the cryptic nature of the OBP recommend instead that a conservative approach is taken, and all saltmarsh habitat with the precinct is considered critical to the survival of the species.

Conservation Advice for BWP defines habitat critical to the survival of the species as foraging and staging habitat found from coastal, sub-coastal and inland areas and wetlands both near the coast for foraging and staging. Given the confirmed presence of BWP in the survey window and confirmed presence of habitat it is clear the precinct supports habitat critical to the survival of the species.

Significant impacts to both OBP and BWP are considered likely based on the intended land use.

Section 3.6.2.4 Waterbirds, Migratory Birds and Raptors

Omissions of key data from the desktop assessment combined with uncertainty in survey effort results in limited confidence in the description for existing conditions.

Section 3.6.2.5 Latham's Snipe and Curlew Sandpiper

Omissions of key data from the desktop assessment combined with uncertainty in survey effort results in limited confidence in the description for existing conditions.

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Section 3.6.2.6 Striped Legless Lizard

Survey effort did not align with published survey guidance and does not appear to have considered all potential habitat for the species. Conclusions that the species is unlikely to be present in the precinct cannot be supported based on the exhibited information.

Section 3.6.2.7 Growling Grass Frog

This section concludes that the GGF was not recorded, though the survey effort does not appear to have considered all potential habitat. The assessment concludes that the precinct is considered to contain current or future potential aquatic and terrestrial habitat for the species. It is unclear what this means, and this habitat is not shown in the assessment.

Section 3.6.2.8 Golden Sun Moth

The survey effort did not align with published survey guidance (weather conditions) and does not appear to have considered all potential habitat for the species, the report maps suitable habitat where surveys have not been undertaken.

Section 3.6.3 Ecological Communities

The assessment notes presence of the nationally significant Natural Temperate Grassland of the Victorian Volcanic Plain (4.75 ha) though fails to note that the area bound by Dandos Road, Gillets Road and the unnamed waterway in 85-225 Avalon Road were recently mapped as supporting significant areas of this community in one of the previous assessments. The area was noted as being overrun by weeds, verbally by WSP in previous consultation with the City, though it is likely that the seed bank of native grasses is still present, and that a plains grassland community could likely re-establish if appropriate land management occurred.

Similarly, Seasonal Herbaceous Wetland (Freshwater) of the Temperate Lowland Plains are previously recorded by Biosis in 2023. EHP have excluded this community due to the presence of weeds. This approach fails to consider that wetland communities are dynamic and change in quality and extent with changes in land management and weather patterns.

Subtropical and Temperate Coastal Saltmarsh was also recorded by Biosis in 2023 but has been excluded by EHP due to the seawall associated with the saltworks disconnecting the area from tidal

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influence. This conclusion fails to acknowledge the tidal intrusion noted by Alluvium in Figure 23 of the Existing Conditions Flood Modelling Report, nor the uncertain role that groundwater plays as a part of maintaining abiotic conditions necessary for this community. If groundwater tidal influence is evident then the community should not be excluded.

Section 4 Legislative and Policy Implications

Section 4.1 Environment Protection and Biodiversity Conservation Act 1999

The uncertainty and issues present throughout the report undermine confidence in the description of potential impacts to Matters of National Environmental Significance at table 25. A more robust assessment which addresses the issues and gaps would likely result in an expanded table of impacts and better inform the potential regulatory requirements for proceeding with an industrial precinct in GAEP.

Section 4.3.1 Environmental Effects Act 1978 (Victoria) Implications

The assessment incorrectly notes in the executive summary and this section that development in accordance with a DPO exempts developers from EES requirements. There is no such exemption in the Act. The requirement for an EES is more accurately described in the VPA background report, and is tied to impacts, not planning processes. This section should be updated.

Appendix 1.2 Habitat Hectare Assessment

Landscape context scores in the habitat hectare assessment require review. These should be allocated in accordance with the direction in the Vegetation Quality Assessment Manual (Version 1.3). Scores for Neighbourhood and Distance to Core Area appear lower than what they should be. Notably all patches were given a score of 1 out of 5 for 'distance to core area' (a core area is an area of native vegetation greater than 50ha). Many of the patches mapped in the biodiversity assessment are arguable contiguous with a 'core area', being connected to the Avalon Coastal Reserve and Ramsar site, as well as forming part of the modelled wetland layer. Both scores will have implications for overall quality score of patches and may impact offset amounts in the NVPP. This was raised with VPA and WSP prior to an NVPP being developed.

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Other matters -

Kangaroos are noted as being present within the precinct, however important habitat has not been spatially mapped. Recommendations for a Kangaroo Management Plan is made in the report, but this has not translated into any biodiversity corridor or requirements in the NVPP or DPO schedule.

Failing to address corridors for Kangaroo mobility throughout the landscape will result in the population being squeezed out and or impacted directly by vehicle strike and loss of habitat. A Kangaroo Management Plan in isolation of appropriate corridors embedded in the rezoning process ultimately leads to the same outcome.

NVPP – WSP November 2025

The City has consistently raised concerns regarding the approach undertaken in the NVPP for the project. Many of these concerns remain in the exhibited version. Critical issues include the level of impact proposed, unachievable native vegetation offsets and the lack of consideration for indirect impacts. There are also errors and departures from legislative requirements throughout the document. The key issues are identified below.

Section 1 – Introduction

The document sets out requirements an NVPP must include to meet obligations of the Native Vegetation Regulations. These are accurately stated, however

- The area to which the plan applies is unclear due to the scale of the maps. The addresses conflict with the maps.
- The document fails to provide an offset statement demonstrating offsets are available for species specific offsets.
- The timeframe of 15 years selected is excessively long for an NVPP, particularly one containing EVCs that are dynamic (such as saltmarsh and plains grasslands). DEECA guidance notes that a 15-year timeframe may unreasonably prevent changes in circumstances being considered.

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Section 1.1 – Purpose of the NVPP

The third dot point refers to accordance with the GAEPW PSP, no such PSP is proposed. The GAEPW DPO is the correct reference.

The fourth dot point notes that it sets out actions to offset the removal of native vegetation, this is inaccurate.

The final dot point notes that the NVPP will streamline the planning approvals process through a precinct wide landscape approach to native vegetation protection and management. The exhibited NVPP establishes requirements that could significantly delay and impede implementation of development within the precinct though a lack of clarity or because they are not achievable.

Section 1.2 Vegetation protection objectives to be achieved

The first objective is not met due to the lack of offset availability for the proposed removal.

Areas set aside to protect native vegetation are unlikely to be conserved in the long term due to the combination of indirect impacts inherent with any industrial development, particularly alterations to hydrology.

Section 2 Area to which the NVPP applies

It is unclear if the document applies to Dandos and Avalon Roads. The maps appear to include these areas, but these roads are excluded from table 2.1.

Section 2.1.1 Ecological Values

The NVPP relies on the EHP Biodiversity Assessment to inform this section of the document, though notes they undertook a high-level verification of the results. It's unclear how rigorous the verification process was or if WSP accessed the land. Concerns around the conclusions of the biodiversity assessment are addressed elsewhere in the appendix but highlight that WPS reiterates the statement that 'the study area is not classified as 'important habitat' as per the EPBC Act Significant Impact Guidelines (DEWHA 2009)'.

This statement is considered inaccurate as the EHP report fails to include publicly available information demonstrating that the site is a wetland of national importance. The salt pans are

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specifically referenced in the National Directory of Important Migratory Bird habitat as areas that migratory birds will 'top-up forage at high tide'. These areas provide contiguous, available habitat to that present within the adjoining Ramsar site and ACR. Abundances of waterbirds across this combined area have exceeded the abundance (20000 birds) required to be considered internationally important.

As sea levels rise, and less habitat is available within the Ramsar site and Avalon Coastal Reserve these salt pans have the potential to provide a more important role in ensuring aggregate migratory bird numbers retain carrying capacity and to ensure obligations under EPBC and international treaty can be met.

2.1.2.1 Rural Conservation Zone

There is inconsistent reference between the exhibited material regarding the size of the RCZ. This section references 256.486ha (which aligns with explanatory report), however section 5.1 of the NVPP states the area is 224.82ha. This 31.67 ha difference appears to be an error.

The rationale informing corridor and buffer widths set out in this section appear to be arbitrary rather than based on published conservation advice.

Significant impact guidelines for Growling Grass Frog

(<https://www.dcceew.gov.au/sites/default/files/documents/significant-impact-guidelines-litoria-raniformis.pdf>) recommend incorporating buffer zones of at least 200m and 350m around water bodies in temperate and semi-arid zones respectively and maintaining dedicated terrestrial habitat corridors a minimum width of 100m to avoid impacts.

EPBC Policy Statement 3.21 Industry Guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species recommends a range of 165m-255m to avoid disturbance.

The use of the RCZ is not supported, see the main submission.

2.1.2.2 ESO4 Removal

The key objective of ESO4 is to prevent a decline in the extent and quality of native vegetation and native fauna habitat of the Victorian Volcanic Plain. Some of the objectives of this schedule are

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proposed to be translated as requirements of a conservation management plan in the DPO schedule. However, the NVPP and broader amendment seeks to permit the removal of significant areas of native vegetation and habitat, including EVCs and habitat specifically referenced in the schedule. It's unclear how the objectives of the ESO are being achieved in the exhibited document. Realistically the proposal contributes to the decline in biodiversity values intended to be protected by Schedule 4 to the ESO.

Section 2.1.2.3 Development Plan Overlay

The proposal includes rezoning of land to INZ and RCZ. The NVPP permits the removal of all native vegetation within INZ, and retention within RCZ. Both the proposed zoning and NVPP are tools intended to provide certainty regarding biodiversity obligations and development potential of the land.

The NVPP then notes further avoidance of biodiversity values is required in the next phase of approvals. Our consistent feedback is that should the RCZ be utilised, then all conservation areas need to be appropriately identified now. Expecting the RA and proponents to undertake additional avoidance and provide new conservation reserves within INZ land where no native vegetation is identified to be retained is unrealistic and will result in an inferior outcome for the site.

To avoid an outcome where biodiversity impacts are 'locked in' prior to the further work identified as being required in the amendment, the RCZ and NVPP should be expanded to appropriately protect all conservation areas. If this is not done the RCZ should be abandoned and indicative reserves identified and appropriately zoned at a later stage.

The NVPP references "areas outside of the RCZ will be identified for removal in the NVPP unless to be retained in Industrial Zone Schedule 1 (INDZ1)". It is unclear how a schedule to INZ1 would specify the retention of native vegetation. This may be referring to the DPO schedule and the additional conservation requirements set out there.

Section 3.2 Description of native vegetation to be removed

The first paragraph in this section notes that all native vegetation outside of the RCZ is "removed or potentially retained". To meet its objectives and requirements, the NVPP needs to provide certainty about retention and removal.

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The description of ecological values outside of the proposed RCZ notes a trend in native vegetation and habitat within retired salt pans. The suggestion that this native vegetation and habitat is 'transitioning firstly to low quality Coastal Saltmarsh EVC 9, and then to native and exotic grassland' has not been supported by appropriate evidence or survey effort. Datasets informing NVPPs are intended to be a snapshot in time, speculating about trend in habitat quality is not appropriate.

Section 4 Native vegetation offsets

Table 4.1 Total Offset requirements for NVPP area

The table provides a non-binding recommendation to source offsets from the Victorian Volcanic Plain to meet objectives of the ESO4. From a local biodiversity perspective, the preference is to offset removals as close to the subject land as possible to retain local floristic communities and genetic diversity, along with habitat availability. The VVP is larger than the CCMA and allowing offsets to be obtained further afield compounds local biodiversity losses. The recommendation is non-binding and does not align with current native vegetation policy, it should be deleted.

The species offset amounts are:

- 20.113 species units of habitat for Prickly Arrowgrass, *Triglochin mucronate*
- 28.015 species units of habitat for Little Tern, *Sterna albifrons sinensis*
- 26.504 species units of habitat for Fairy Tern, *Sterna nereis nereis*
- 19.600 species units of habitat for Creeping Rush, *Juncus revolutus*

The NVPP confirms that these species offsets are not available on the Native Vegetation Credit Register, nor are any potential offset sites identified. Investigating establishment of first party offset sites is recommended across native vegetation areas nominated for retention. This approach fails to meet the requirement to demonstrate offset availability for vegetation proposed for removal making approval of the NVPP unlikely. As discussed in the comments for the Biodiversity Assessment, there are questions regarding how the habitat hectares scores have been allocated that need to be resolved. This could result in a higher offset requirement than the NVPP suggests.

The City has experience in administering NVPPs containing unavailable species offsets. The Armstrong Creek Town Centre and Horseshoe Bend NVPPs (C399ggee) require species units of

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habitat for Bellarine Yellow Gum. Over almost a decade, this issue has plagued implementation, required considerable resourcing, and resulted in lengthy development delays and the illegal removal of native vegetation. The requirement to demonstrate the availability of offsets under the native vegetation guidelines should apply to this NVPP.

It is unclear if first party offsets within the precinct would be viable based on the vegetation condition and the willingness or otherwise of the landowner to offset in these locations. Standard offset agreements include obligations to maintain threats, this includes altering hydrology. Securing offsets within the proposed conservation area may further compound the complexities regarding stormwater and integrated water management discussed elsewhere in this submission.

WSP has not divided offset figures across property boundary areas. This will result in unnecessary administrative burden for both proponents and the RA at the time of development. The report should be amended to address this.

Table 4.2 Offset requirements per patch identified for potential removal as per NVR at Appendix A

All patches excluding 1B-12B and 35A-99A trigger species offsets. It is impossible to determine where patches are located on the maps provided at figure 2 (see section 8.1) due to their spatial scale. The City is unable to advise if there are any logical areas containing native vegetation that could be developed without the need to obtain species offsets. If there is no such area, development will halt at the first stage where native vegetation is impacted. The provision of a set of maps that enables the reader to clearly identify the spatial location of native vegetation is required. It is noted further avoidance of native vegetation may be the only realistic way to address the issue of species offsets.

Section 5.1 Description of native vegetation to be retained

As discussed earlier, there are contrasting figures in the exhibited documentation regarding native vegetation and proposed conservation areas. In addition to the conflicting conservation areas already highlighted, this section states that 212.261ha of native vegetation will be retained. The biodiversity assessment informing this NVPP identifies a total extent of 177.4 ha within the GAEP DPO area. There is a 101.625ha discrepancy between the biodiversity assessment and NVPP. The NVPP needs to correct this issue.

The reference to Gillies Road in the second paragraph should be Gillets Road.

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Section 6 Conditions for the removal of native vegetation

Condition b. is subjective and would be difficult for the RA to enforce or administer.

Condition c. is a standard requirement that needs to be included, but species offsets are not available, rendering this condition unachievable for proponents at this time.

Section 7 Recommendations

The recommendations suggest that 'particular caution around ecological values present is taken' around a variety of other matters that the rezoning has not adequately considered. It is unclear what the NVPP intends by recommending caution around identified values. If avoidance or other requirements are necessary, these should be specified with clear direction.

The recommendations regarding indirect impacts from hydrology changes identifies a key gap in the NVPP approach. Indirect impacts are required to be quantified and then appropriately avoided, minimised or offset in accordance with the three-step approach underpinning the native vegetation regulations. Indirect impacts have not been considered in this NVPP, and native vegetation nominated for retention is likely to be removed over time by edge effects and altered hydrology. Similarly, the NVPP has not attempted to consider identified transport and servicing upgrade connections exhibited along with the document. The native vegetation impact associated with GAEPW is likely far greater than the NVPP states.

The final recommendation is listed as a condition in the DEECA Native Vegetation Precinct Plan Template. This should be redrafted to a condition and included in section 6, along with all the other standard conditions in the NVPP template that have been omitted from this NVPP.

DPO50 Draft

Section 1.0 – Objectives

It is unclear how the third objective can be met based on current plan. DPO50 objectives to facilitate industrial development while protecting significant biodiversity values are mutually exclusive.

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Section 2.0 – Requirement before a permit is granted

- Allowing roads to be constructed before a development plan is an unusual approach and, given gaps in data, is not supported.
- Infrastructure contributions agreement – include reference to conservation land establishment and management costs.

Section 3.0 – Conditions and requirements for permits

- Drainage and stormwater management. Section including “assessment of the risks of adverse impact on receiving waters and environment with regard to stormwater volume and water quality”. Recommend including a requirement for IWMP to eliminate or mitigate identified risks.

Section 4.0 Requirements for development plan

- Site masterplan – second dot point implies that the open space network will be used to retain native vegetation in accordance with the NVPP, all vegetation for retention is in conservation reserves. Open space in terms of recreation needs to be separate to prevent unintended impacts to biodiversity values.
- EPBC report – it is unclear how timing of approvals is intended to work or how this requirement is achievable for a proponent. An EPBC approval would have to be in place prior to a development plan being lodged to inform this requirement and the masterplan. However, to get an EPBC approval they’ll need a masterplan to refer. Which is intended to take precedence?
- Avalon Airport Impact Assessment Report – wildlife strike management conflicts with proposed conservation land use.
- Bushfire management plan to exclude conservation areas from defendable space obligations.
- Landscape Concept Plan – unclear what dot point ‘details of vegetation to be retained and recommendations for management and retention vegetation’ means.

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- Conservation Management Plan – Highlight the need to integrate this with the NVPP, Biodiversity Assessment and requirements for IWMP and Drainage Plan requirements.

DDO53 Draft

Recommend adding reference to ACR and Ramsar areas to second dot point at design objectives.

Section 2.0

- Fencing requirement – update to ensure they are unenforceable and include wildlife friendly design (including macropods).
- Include reference to buffers and setbacks to ACR and avifauna habitat.
- Building design adjacent ACR, Conservation areas and the waterways should be muted and screened.
- Light baffle should be expanded to include areas adjoining conservation in accordance with National Light Pollution Guidelines for Wildlife and EPBC policy statement 3.21.
- Headlight glare landscape requirement to be similarly expanded.
- Landscaping requirement to be indigenous or native conflicts directly with requirement to not attract wildlife for the Airport.

Section 3.0 Subdivision

Include requirement to include a road frontage to all conservation reserves.

THE CITY OF
GREATER GEELONG

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Attachment 1 – Drainage Authority Letter

CITY OF GREATER GEELONG

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Director Regional Victoria
Victorian Planning Authority

22 December 2025

Doc No: D25-612854
Our Ref: PRJ-21-240

Dear [REDACTED],

Re: Geelong Avalon Employment Precinct Stormwater Management

In relation to the Geelong Avalon Employment Precinct (GAEP) project which the City has been working on collaboratively, with the Victorian Planning Authority (VPA), now Department Transport and Planning (DTP) The City writes to raise the following:

As the drainage authority and future custodian of civil stormwater assets, the City wishes to raise several concerns regarding the proposed rezoning and development within the Greater Avalon Employment Precinct.

The City's preliminary assessment has identified a number of matters that may materially affect the ecological integrity of the area, as well as hinder the City's ability to sustain the performance of stormwater infrastructure for perpetuity through our current funding structure.

Based on the information made available to date, the below items are the areas where we remain dissatisfied that sufficient evidence and due consideration has been afforded to allay concerns.

a) Altered Surface Water Regimes and Ecological Function

It is reasonable to consider that the proposed development will significantly modify existing sheet flow patterns, concentrating runoff into defined channels. This change risks altering soil moisture regimes, reducing habitat suitability for existing flora and fauna, and potentially diminishing ecological functions across the site and/or introducing undesirable fauna to the local environment.

b) Financial Sustainability

Transitioning from dispersed overland flows to concentrated drainage pathways within this ecologically sensitive area will most likely necessitate complex supplementary treatment measures along with mechanical aids be adopted. Such infrastructure is expected to impose higher stormwater management costs. As detail has been sparse, our concerns regarding The City's ability to sustain the ongoing performance of these systems through traditional rateable income streams remains unanswered.

c) Infrastructure Land Management Access

The City anticipate that stormwater infrastructure required to deliver the developments planning objectives will likely rely on a combination of City managed infrastructure on crown land, public land and supplemented by shared infrastructure on private property. With such a diverse spread of land management we are seeking consideration for the following:

- **Crown Land** - We consider it prudent that pre-negotiated permit conditions and access arrangements for crown landholdings are formalised as part of the development planning of the stormwater system.
- **Avalon Airport** - Infrastructure is to maintain clear separation from the existing airport gas main. We would seek that the design for infrastructure inclusive on stormwater within the vicinity of the existing gas pipeline be considerate of not only maintenance obligations but equally infrastructure renewal obligations and measures be put in place to ensure

activities, such as sediment removal, excavation works etc can be undertaken with limited restrictions imposed.

- **Private property** – Pending completion of the overarching stormwater strategy for the precinct, it is conceivable that supplementary stormwater quality and volume treatment infrastructure be located within private properties. To ensure that private landowners are aware of their obligations toward either allowing access to or the management of, shared public stormwater infrastructure, it is considered necessary that Section 173 agreements or a similar instrument be applied to each relevant property.

We also recognise that through the diverse ecological sensitivities of the site, consideration be made for exemptions relating to EPBC approvals to facilitate unencumbered infrastructure management where management responsibility lies with The City.

d) Climate Change

The City request that the GAEP stormwater management strategy be designed to SSP3 2100 climate modelling parameters with sensitivity testing to SSP5 2100. The modelling should consider measures needed to achieve requirements for pre-development discharge volumes and rates.

Having our teams collaborate in more detail early in the design refinement process and embed appropriate outcomes to mitigate the items highlighted above within the Development Plan would be seen favourably.

Recognising the collaborative nature of this development to date, the City respectfully requests further consideration of these matters and welcome the opportunity for the Civil Infrastructure team to work with DTP to realise favourable outcomes for all.

The City can be contacted should more information be required.

Yours sincerely



MANAGER CIVIL INFRASTRUCTURE
CITY OF GREATER GEELONG

Copy to:

[REDACTED], Acting Executive Director City Infrastructure, City of Greater Geelong
[REDACTED], Coordinator Civil Infrastructure Planning, City of Greater Geelong