

SUBMISSION TO THE VPA PROJECTS STANDING ADVISORY COMMITTEE

Draft Greater Geelong Planning Scheme Amendment C477ggee

Greater Avalon Employment Precinct

Submitted to:

Victorian Planning Authority Projects Standing Advisory Committee
Planning Panels Victoria

[REDACTED]

Date: 16/03/2026

Introduction

This submission relates to Draft Amendment C477ggee to the Greater Geelong Planning Scheme, which seeks to facilitate development within the Greater Avalon Employment Precinct (GAEP), primarily through rezoning land west of Avalon Airport to the Industrial 1 Zone and Rural Conservation Zone and the introduction of new planning controls including Development Plan Overlay Schedule 50 (DPO50) and Design and Development Overlay Schedule 53 (DDO53).

The Amendment is strategically significant for Victoria. The GAEP represents one of the largest proposed employment precincts in regional Victoria and sits at a critical intersection of transport infrastructure including Avalon Airport, the Princes Freeway, rail infrastructure and the broader Geelong metropolitan region.

The submitter is a prospective co-venturer for the following landowners in the GAEP North component of the future PSP:

- [REDACTED]
- [REDACTED]

The submitter seeks consideration of GAEP North within the current planning scheme amendment process and will structure the submission around the Key Issues identified in Table 1 of the exhibited material, applying those issues specifically to the GAEP North precinct.

The submission also responds to the statement made by the Victorian Planning Authority (VPA) on 13 November 2025, which provides:

“The VPA cannot go ahead with GAEP North now because further investigations are needed to resolve complex drainage issues, biodiversity constraints and upgrades to Beach Road Interchange. A detailed economics assessment has also found that with GAEP West (and Airport land coming online) there is enough industrial land to meet medium-term demand.”¹

The submitter contends that this position has been reached without the benefit of detailed technical investigations specific to GAEP North, including drainage and engineering assessments and a comparative biodiversity analysis between GAEP North and GAEP West. In the absence of such investigations, the current position risks limiting the Panel’s ability to consider the precinct on the basis of a complete evidentiary record.

Further, the economic conclusions relied upon, primarily derived from the SGS Economic Report, appear to rely on theoretical industrial land supply rather than deliverable market supply. The submission will examine whether the concentration of land ownership in GAEP West may affect the timing and availability of industrial land to the market, and whether this has implications for the assessment of medium-term employment land demand.

In order to assist the Panel, this submission will address the **Key Issues identified in Table 1** and apply them to GAEP North through the preparation of supporting technical material, including:

1. **Biodiversity and Native Grassland Assessment** prepared in accordance with DEECA vegetation and offset principles.
2. **Flooding, drainage and water management strategy**, addressing catchment hydrology and potential outfall solutions that bypass critical RAMSAR wetlands.
3. **Development Plan Overlay (DPO) pathway** for the orderly planning of GAEP North.
4. **Planning Scheme implementation steps** required should the precinct proceed to the next stage of strategic planning.

The purpose of this submission is to ensure that the Panel and the VPA will subsequently have the benefit of a complete technical and strategic assessment of GAEP North, allowing the precinct to be considered alongside GAEP West on a transparent and evidence-based basis. It is intended that the future investigations in the short-term will enable the Panel to determine whether GAEP North should proceed within the planning framework for the Greater Avalon Employment Precinct.

The strategic framework for the future rezoning of GAEP North is currently underdeveloped, despite the potential for GAEP North to provide a more environmentally and infrastructurally appropriate location for employment land. The planning scheme controls proposed by the Amendment for GAEP West may prematurely facilitate development outcomes before key environmental and infrastructure issues are fully resolved.

¹ Victorian Planning Authority, *What is Happening to Greater Avalon Employment Precinct North?* (Web Page) <https://vpa.vic.gov.au/fag/what-is-happening-to-greater-avalon-employment-precinct-north/>.

1. Biodiversity

The Department of Energy, Environment and Climate Action (DEECA) released Submission 32 on 10 December 2025 in response to the Native Vegetation Precinct Plan (NVPP) prepared for the Greater Avalon Employment Precinct West (GAEP West)². DEECA is the Victorian Government agency responsible for administering the Native Vegetation Removal Regulations and the Native Vegetation Guidelines, and its submission was commissioned to review whether the exhibited biodiversity assessment and offset framework complied with those regulatory requirements.

The WSP report, dated November 2025, proposes a strategic native vegetation removal framework to facilitate industrial development within GAEP West through the NVPP mechanism. Under this approach, native vegetation removal across the precinct can occur without individual planning permits where removal is consistent with the NVPP and where the associated biodiversity offset obligations have been appropriately accounted for and secured³. The integrity of this system therefore depends on the NVPP demonstrating that the biodiversity impacts of development have been properly assessed and that the required offsets are available and deliverable.

DEECA's review identifies several fundamental deficiencies in the exhibited NVPP material. In particular, DEECA concludes that the Native Vegetation Precinct Plan does not yet demonstrate that the offset obligations generated by the proposed vegetation removal can be met in accordance with the Native Vegetation Guidelines. As DEECA states:

*"DEECA does not support the approval of the NVPP without confidence that the offset obligations can be met and that the requirements in NVG are met."*⁴

A central concern raised by DEECA relates to the absence of available species offsets required to compensate for impacts on threatened flora and fauna associated with the GAEP West development footprint. The WSP report itself acknowledges that no suitable species offsets are currently registered and that the required offsets would need to be created in the future⁵. DEECA considers this approach inconsistent with the requirements of the Native Vegetation Guidelines, which require that offset solutions be clearly identified and demonstrably achievable before approval of a precinct-scale removal framework⁶.

² Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025).

³ WSP Australia Pty Ltd, *Greater Avalon Employment Precinct West Native Vegetation Precinct Plan* (Report prepared for the Victorian Planning Authority, November 2025), 4.

⁴ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 2.

⁵ WSP Australia Pty Ltd, *Greater Avalon Employment Precinct West Native Vegetation Precinct Plan* (Report prepared for the Victorian Planning Authority, November 2025), 16.

⁶ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 1-2.

DEECA also identifies a number of technical deficiencies in the ecological accounting presented in the WSP report. For example, DEECA found that the spatial dataset underpinning the NVPP overstated the extent of retained native vegetation due to duplicated patch features. After reviewing the shapefiles, DEECA determined that the correct figure for retained native vegetation within the Rural Conservation Zone is approximately 109.1 hectares, requiring correction of the NVPP documentation⁷.

More broadly, DEECA raises concerns that the ecological and hydrological consequences of development within GAEP West have not been adequately resolved at the strategic planning stage. The submission notes that the exhibited material does not include a completed drainage strategy and that critical matters affecting wetland hydrology and conservation outcomes are intended to be addressed only at the Development Plan stage⁸. Given the sensitivity of coastal saltmarsh ecosystems to hydrological change and freshwater incursion, DEECA warns that the long-term conservation outcomes for retained vegetation within the precinct remain uncertain⁹.

Taken together, DEECA's submission demonstrates that the WSP NVPP for GAEP West relies on a number of unresolved assumptions regarding offset availability, ecological impacts and hydrological management. These issues raise significant doubt as to whether the biodiversity framework underpinning GAEP West is sufficiently robust to support the proposed industrial rezoning without further investigation and resolution of the identified deficiencies.

In contrast to the unresolved offset framework identified by DEECA in relation to GAEP West, [REDACTED] would endeavour to prepare a NVPP for GAEP North that would allow the offset requirements of the Native Vegetation Guidelines to be addressed in a clear and compliant manner. Given that GAEP North largely comprises cleared agricultural land with limited remnant native vegetation, the scale of offsets required would be materially lower and therefore more readily secured. A compliant offset statement could be prepared consistent with the criteria identified by DEECA by: first, identifying the boundaries of proposed offset sites within or adjacent to the precinct where ecological restoration or enhancement could occur; second, obtaining at least in-principle agreement from the relevant landowners willing to host those offset sites; third, undertaking habitat hectare assessments to confirm that the expected generation of Species Habitat Units (SHUs) would be sufficient to meet the NVPP offset obligations arising from any vegetation removal; and fourth, demonstrating through ecological assessment that the proposed offset sites satisfy the eligibility criteria in section 9 of the Native Vegetation Guidelines¹⁰. By structuring the NVPP in this way, the GAEP North precinct would be capable of presenting a fully substantiated offset framework at the strategic planning stage, thereby avoiding the uncertainty identified by DEECA in relation to GAEP West and ensuring that biodiversity obligations are transparently addressed prior to rezoning.

⁷ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 3.

⁸ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 2-3.

⁹ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 2.

¹⁰ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 4.

In summary, WSP's November 2025 NVPP is not a completed biodiversity solution. It is an aspirational framework that defers critical matters to later stages, despite GAEP West being a highly constrained coastal wetland interface with biodiversity, hydrology, offsets and indirect loss risks.

2. Drainage Strategy

i) Flooding, Drainage and Integrated Water Management

Flooding, drainage and integrated water management are central considerations in the planning of the Greater Avalon Employment Precinct (GAEP). The submissions of Melbourne Water¹¹, the City of Greater Geelong¹² and the Department of Energy, Environment and Climate Action (DEECA)¹³ collectively demonstrate that significant uncertainty remains regarding drainage outcomes for the currently exhibited GAEP West precinct. Those same submissions also indicate that further technical work is required before drainage feasibility can be confirmed. In this context, it is both reasonable and prudent that GAEP North be afforded the opportunity to develop a standalone drainage strategy that complies with the Native Vegetation Precinct Plan (NVPP), avoids as much Ramsar wetlands as possible, and identifies a legally and environmentally acceptable point of discharge.

ii) Melbourne Water: Drainage Feasibility Remains Unresolved

Melbourne Water, as the designated drainage authority for much of the GAEP North catchment, emphasises that drainage feasibility has not yet been demonstrated. In its submission, Melbourne Water notes that the ability to deliver drainage services to GAEP North has not yet been confirmed and requires further investigation. Melbourne Water states that:

*"Melbourne Water remains concerned that the delivery of drainage to service the GAEP North Precinct has not yet been confirmed."*¹⁴

The submission further warns that without a confirmed drainage solution the precinct may not be capable of development as envisaged:

*"If drainage cannot be delivered, the land may not be able to be developed as envisaged by the Amendment."*¹⁵

Importantly, Melbourne Water does not conclude that drainage is impossible. Rather, it states that additional investigation and design work is required:

*"Extensive additional design work will be required to confirm that the GAEP North Precinct is able to be drained."*¹⁶

¹¹ Melbourne Water, *Submission – Draft Planning Scheme Amendment C477ggee* (Submission to the Department of Transport and Planning, 18 December 2025) 1.

¹² City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025) 3.

¹³ Department of Energy, Environment and Climate Action (Vic), *Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review* (Submission to the Victorian Planning Authority, December 2025).

¹⁴ Melbourne Water, *Submission – Draft Planning Scheme Amendment C477ggee* (Submission to the Department of Transport and Planning, 18 December 2025) 1, 1.

¹⁵ Ibid.

¹⁶ Ibid.

The drainage issue is therefore not insurmountable; there has simply been insufficient technical work having been undertaken to date. GAEP North landholders were not advised as to the importance of undertaking these technical studies. Now that they are aware, it is entirely reasonable that proponents of GAEP North be permitted to undertake the necessary engineering and hydrological investigations, so that both Geelong Council and the VPA can make a better-informed decision.

iii) City of Greater Geelong: Stormwater and Ramsar Impacts Must Be Investigated

The City of Greater Geelong similarly identifies unresolved stormwater and flood management issues and calls for additional studies to be completed before development proceeds. The City expressly requires additional stormwater analysis and integrated water management planning.

The City's submission recommends:

*"Completion of an Integrated Water Management Plan and additional stormwater assessments."*¹⁷

The City also emphasises that drainage flow paths must be properly investigated and confirmed¹⁸.

The submission is particularly clear that drainage infrastructure must not encroach upon conservation land or Ramsar-sensitive areas. The City states:

*"The City does not support any drainage assets (including basins, channels, underground pipes etc.) within the conservation area."*¹⁹

Similarly, the City requires that drainage infrastructure be excluded from conservation reserves entirely²⁰.

The City also emphasises that Ramsar impacts must be assessed before development proceeds:

*"Complete additional stormwater and Ramsar impact assessments to inform the DPO."*²¹

The submission further requires that the Flood Impact and Risk Assessment be expanded to consider additional flood events and climate change:

*"Update the Flood Impact and Risk Assessment to include 10%, 1% and 0.5% events with climate change scenarios."*²²

Taken together, these requirements demonstrate that the drainage framework for GAEP remains incomplete and subject to further investigation.

¹⁷ City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025), 3.

¹⁸ Ibid.

¹⁹ City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025), 12.

²⁰ City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025), 15.

²¹ City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025), 15.

²² City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025), 15.

iv) DEECA: Risks to Ramsar Wetlands and Hydrological Systems

DEECA's submission raises significant concerns regarding the hydrological implications of the currently proposed GAEP West drainage approach. DEECA highlights that unresolved water management issues present a material environmental risk.

DEECA identifies:

*"Unresolved challenges in relation to surface water management."*²³

Among the key concerns identified are the potential impacts on nearby Ramsar wetlands²⁴.

DEECA also highlights uncertainty regarding the capacity of proposed outfalls and downstream environmental effects:

*"Outfall capacity constraints and uncertainties, particularly relating to potential downstream impacts on the Ramsar site, Avalon Coastal Reserve and Hovells Creek."*²⁵

The submission further notes that hydrological modelling and water quality analysis remain incomplete:

*"The exhibited material does not include a drainage strategy."*²⁶

DEECA also identifies uncertainty regarding the sensitivity of marine ecosystems in Corio Bay:

*"Insufficient evidence on the sensitivity and acceptable limits of change for seagrass in Corio Bay."*²⁷

These findings reinforce that robust hydrological modelling and drainage design remain outstanding tasks.

v) Opportunity for a GAEP North Drainage Strategy

Taken together, the submissions of Melbourne Water, the City of Greater Geelong and DEECA demonstrate that drainage feasibility across the broader GAEP remains unresolved and subject to further investigation. Rather than treating this uncertainty as a reason to defer GAEP North, it should instead be recognised as an opportunity to undertake the necessary technical work for GAEP North and GAEP West *concurrently*, and then relevant authorities could make an informed decision based on comparative drainage strategies and respective biodiversity effects.

²³ Department of Energy, Environment and Climate Action (Vic), Submission 32: Greater Avalon Employment Precinct – Native Vegetation Precinct Plan Review (Submission to the Victorian Planning Authority, December 2025), 3.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Ibid.

A dedicated drainage investigation for GAEP North could be undertaken within a relatively short timeframe by hydrological engineers commissioned by [REDACTED]. Such work would involve:

- hydrological modelling of catchments and flood behaviour
- identification of gravity-based drainage flow paths
- assessment of legally permissible points of discharge
- Ramsar impact assessment
- water quality treatment design
- Integrated Water Management planning

Importantly, a drainage solution for GAEP North could be designed to avoid conservation land and Ramsar wetlands where possible, consistent with the requirements expressed by both DEECA and the City of Greater Geelong.

One potential option requiring investigation is a discharge to Corio Bay at a location outside Ramsar-affected areas, subject to detailed hydrological modelling and environmental approvals. Council itself recognises that outfall investigations to Corio Bay may be required, including:

“Bathymetry survey of outfall to Corio Bay and flood modelling extending to Corio Bay.”²⁸

The key point is that GAEP North has not yet been given the opportunity to demonstrate a compliant drainage solution. To deny landowners this right so late in the PSP process is to deny them natural justice/procedural fairness. Australian administrative law principles presume that where a decision affects a person’s interests, the decision-maker must provide a meaningful opportunity for those to present their case unless the statute clearly excludes that requirement.

In *Kioa v West Mason J* affirmed that the hearing rule applies whenever a statutory power affects a person’s interests or legitimate expectations. His Honour stated that *“a statutory authority having power to affect the rights of a person is bound to hear him before exercising the power”²⁹*. This principle is directly relevant to planning processes such as a planning scheme amendment: where landowners’ development rights or economic interests may be curtailed, fairness ordinarily requires that they be given the opportunity to respond to the issues relied upon by the decision-maker.

Therefore, the VPA ought to give the GAEP North landowners the opportunity to bring in the requisite information to present their case for a planning scheme amendment. With focused technical investigations, a draft concept drainage strategy could realistically be prepared and presented to the Victorian Planning Authority and the City of Greater Geelong within a short time frame. The GAEP North precinct has not yet had an opportunity to present modelling from suitable hydrological and geotechnical engineers. In those circumstances, the appropriate planning response is not to exclude GAEP North from consideration, but to allow the necessary engineering, hydrological and environmental investigations to proceed, which will be commissioned by [REDACTED].

²⁸ City of Greater Geelong, *Submission to Planning Scheme Amendment C477ggee: Greater Avalon Employment Precinct* (Submission to the Victorian Planning Authority, 22 December 2025), Attachment 1.

²⁹ *Kioa v West* (1985) 159 CLR 550, 584-585.

3. Market Feedback & Economics

i) Soil Conditions and Operators

On the issue of drainage and subgrade performance, the submitter's geotechnical advisers have noted that the soils within the GAEP North precinct are generally more cohesive and easier to compact to engineering specification than highly sodic soils. By contrast, sodic soils are known to disperse when wet due to elevated sodium levels, resulting in reduced aggregate stability, poor infiltration, subgrade weakening and unpredictable settlement behaviour. Such soils can present challenges for large-scale industrial development because they may lead to pavement failure, erosion of drainage channels, waterlogging and the need for extensive chemical stabilisation (such as gypsum or lime treatment).

The submitter is nevertheless confident that experienced developers such as ██████████ ██████████, with their multigenerational experience delivering major industrial estates, are capable of remediating these conditions should they arise in GAEP West. However, market feedback suggests that geotechnical certainty remains an important factor for prospective end users. Notably, the owner of ██████████ was recently approached by a global defence contractor who expressed a preference for land within GAEP North over GAEP West specifically due to concerns about the potential engineering risks associated with development on a former salt works.

ii) A Rebuttal of the SGS Report

The decision to defer GAEP North is heavily influenced by the industrial land demand and supply modelling contained in the *Greater Avalon Employment Precinct Economic and Scoping Study* prepared by SGS Economics and Planning³⁰. However, a close reading of the report reveals that its conclusions are highly contingent on modelling assumptions that are inherently uncertain and are contradicted by industry evidence regarding the availability of industrial land in the broader Geelong and western metropolitan corridor³¹.

The SGS report itself acknowledges that the modelling of future land consumption is uncertain and dependent on numerous variables including infrastructure delivery, market demand and the release of additional industrial land elsewhere in the corridor. In particular, SGS notes that the timing of GAEP North is based on assumptions that may change significantly over time, stating that "take up estimates are based on the best available assumptions... GAEP North... could be accelerated and come to market earlier if demand warrants and appropriate infrastructure is able to be provided"³². This acknowledgement significantly weakens the argument that GAEP North should be excluded from the current planning scheme amendment on the basis that demand will not arise until the mid-century period.

³⁰ SGS Economics and Planning, *Greater Avalon Employment Precinct Economic & Scoping Study and Planning Framework* (Report prepared for the Victorian Planning Authority, November 2025).

³¹ Charter Keck Cramer, *Greater Geelong Industrial Land Supply Review 2025* (Report prepared for the City of Greater Geelong, October 2025); Property Council of Australia, *Industrial Land Supply Review: Submission to the City of Greater Geelong* (Submission, 13 November 2025).

³² SGS Economics and Planning, *Greater Avalon Employment Precinct Economic & Scoping Study and Planning Framework* (Report prepared for the Victorian Planning Authority, November 2025), 54.

Further, the modelling assumes that GAEP West would commence development in 2026 and continue until approximately 2056, with GAEP North only coming online thereafter³³Such assumptions rely on a highly speculative projection of industrial land consumption over a period exceeding thirty years. Long-term economic modelling of this nature is inherently uncertain, particularly in a rapidly evolving logistics and advanced manufacturing economy. The report itself acknowledges this uncertainty, noting that outcomes become “increasingly uncertain for modelling employment over a long period” due to changing economic conditions and technological influences³⁴. **Accordingly, to remove GAEP North from the current amendment based on such speculative long-term modelling is unsound, particularly where the assumptions extend over a thirty-year horizon and are themselves acknowledged to be subject to significant uncertainty.**

Industry evidence also suggests that the assumption of abundant industrial land supply may be unrealistic. The Property Council of Australia, in its submission to the City of Greater Geelong Industrial Land Supply Review, emphasises that demand for industrial land has intensified significantly in recent years. The submission notes that demand for logistics facilities surged during the COVID-19 period and that “vacancy rates remain low” across industrial markets.³⁵ The submission further warns that as industrial land becomes scarce, “the cost of available land rises sharply”, increasing operational costs for businesses and constraining economic growth³⁶.

Importantly, the Property Council also highlights that planning delays and infrastructure staging can artificially restrict industrial land delivery. It notes that “planning inefficiencies and delays [are] continuing to hold back the delivery of jobs in critical areas” and that rigid staging mechanisms can create “artificial scarcity by constraining the market’s ability to develop”³⁷. These observations directly challenge the staged delivery assumptions underlying the SGS modelling.

Taken together, these factors suggest that the SGS modelling should not be interpreted as a definitive justification for excluding GAEP North from the current amendment. Rather, the evidence indicates that industrial land demand in the western corridor is dynamic and that delaying GAEP North may risk constraining supply, limiting competition in the industrial land market, and undermining the long-term economic potential of the Greater Avalon Employment Precinct.

Furthermore, within GAEP North there is a strong visitor economy component essential to support the evolving role of Avalon Airport as a regional and international gateway. The GAEP Framework Plan itself recognises a Visitor Economy Precinct within GAEP North intended to support tourism, visitor services and business travel associated with Avalon Airport. With Avalon Airport (AVV) reviving international connectivity through Jetstar flights to Bali (Denpasar) commencing in March 2026, alongside existing domestic routes to Sydney, Adelaide, Brisbane and the Gold Coast, passenger volumes are expected to increase significantly. This growth will generate demand for airport-serving uses such as hotels, conferencing facilities, hospitality and short-stay

³³ SGS Economics and Planning, *Greater Avalon Employment Precinct Economic & Scoping Study and Planning Framework* (Report prepared for the Victorian Planning Authority, November 2025), 54.

³⁴ SGS Economics and Planning, *Greater Avalon Employment Precinct Economic & Scoping Study and Planning Framework* (Report prepared for the Victorian Planning Authority, November 2025), 56.

³⁵ Property Council of Australia, *Industrial Land Supply Review: Submission to the City of Greater Geelong* (Submission, 13 November 2025), 3.

³⁶ *Ibid.*

³⁷ Property Council of Australia, *Industrial Land Supply Review: Submission to the City of Greater Geelong* (Submission, 13 November 2025), 4 & 7.

accommodation³⁸. The planning framework already anticipates such uses, noting that visitor economy activities may include “accommodation and short stay options, conference and meeting facilities, business services and tourism supporting uses.”³⁹ From both a planning and regional development perspective, it would be incongruous for an emerging international airport gateway to lack appropriate visitor infrastructure. Travellers arriving at Avalon should be welcomed by a high-quality precinct with appropriate accommodation, hospitality and public realm outcomes rather than being forced to navigate potholed rural roads or rely on roadside motels. Establishing a properly planned visitor economy precinct adjacent to the airport would create the necessary spectacle and gateway experience befitting Avalon’s role between Melbourne and Geelong, while supporting tourism, aviation workforce needs and broader regional economic activity.

4. Strategies under Clause 11.03-6L-06

While █████ supports the strategic objectives of Clause 11.03-6L-06, it submits that the same strategic framework should apply equally to GAEP North.

The Framework Plan clearly identifies the Greater Avalon Employment Precinct as a single strategic employment area, with both GAEP West and GAEP North forming part of the long-term development structure.

Excluding GAEP North from the current planning scheme amendment risks undermining the integrated planning approach envisaged by the Framework Plan. Strategic planning for infrastructure, drainage and environmental management is most effective when applied across the entire precinct rather than fragmented into separate planning processes.

A further practical consideration arises in relation to the Beach Road interchange and corridor upgrades identified in Clause 11.03-6L-06. The background report notes that Beach Road, which services Avalon Airport, Point Wilson and GAEP North, will experience significant traffic demand and requires duplication and interchange upgrades.⁴⁰ █████ is awaiting the Commonwealth-commissioned traffic report for Beach Rd and it will inform future traffic and road design.

At present, the Beach Road corridor within the GAEP North area is in poor physical condition, with sections of the road surface deteriorated and affected by potholing. This reflects the fact that the corridor was originally designed as a rural access road rather than a strategic employment corridor serving a major airport precinct.

In this context, the most efficient infrastructure funding approach would be to upgrade Beach Road concurrently with development of GAEP North, using development contributions or infrastructure agreements levied on benefiting landowners. Delivering the upgrades in this way would ensure that the cost of improving the corridor is shared by those developments that directly generate the traffic demand, while also providing a timely infrastructure outcome that supports Avalon Airport operations.

³⁸ Norton Rose Fulbright Australia, *Submission to Draft Planning Scheme Amendment C477ggee on behalf of 55 Beach Road Pty Ltd* (Submission to the Victorian Planning Authority, 11 December 2025), 1-2.

³⁹ *Ibid.*

⁴⁰ Victorian Planning Authority, *Greater Avalon Employment Precinct Background Report* (Draft, November 2025), 48.

By contrast, prioritising development in GAEP West does little to address the transport corridor most closely associated with airport access. GAEP West is located further from the core Avalon Airport interface, whereas the GAEP North land directly fronts the Beach Road–Avalon Airport corridor. Upgrading this corridor through development contributions associated with GAEP North would therefore deliver both the infrastructure upgrade and the strategic airport interface improvements contemplated by Clause 11.03-6L-06, rather than deferring those upgrades indefinitely.

5. Drafting of Planning Scheme Ordinance

In principle, the use of a Development Plan Overlay schedule for GAEP West is an appropriate statutory mechanism for an employment precinct of this scale, provided the control is drafted and supported by adequate technical work.

The exhibited material makes clear that DPO50 is intended to require a development plan before permits are granted for use, development or subdivision, and to ensure coordinated outcomes for airport protection, biodiversity, drainage, transport and amenity. The VPA's own background report states that the amended pathway for GAEP West is to proceed by Framework Plan, rezoning, DPO50, DDO53 and NVPP, while GAEP North is deferred pending further drainage, transport, biodiversity and strategic work⁴¹. However, as the City of Greater Geelong emphasises, the ordinance should not defer so much unresolved work to the later development plan stage that the rezoning occurs without a clear evidentiary basis.

On the question of the type and nature of permits that may be granted before approval of a development plan, a limited capacity to allow genuinely minor works before development plan approval is sensible. Appendix 1 to Submission 56 recognises that some minor buildings and works may logically proceed before a development plan, but objects to any drafting that would allow substantive subdivision or prematurely lock in infrastructure obligations before the development plan and funding framework are settled⁴².

Clause 4.0 of the development plan addresses the site master plan, airport impact assessment, integrated water management, drainage and stormwater strategy, staging, landscape, conservation and ESD. Those matters correspond with the known state interests and technical constraints identified in the Background Report, especially airport operations, biodiversity, drainage/flooding/water quality and transport⁴³. HARC's paper expressly says the DPO is not itself the drainage solution, but rather the mechanism to require the investigations and coordinated framework needed to achieve one⁴⁴. [REDACTED] agrees with Geelong council that all technical work should be completed prior to the amendment, which enables simplification of the DPO schedule⁴⁵. Deferring key matters such as drainage investigations risks allowing the amendment to proceed on the assumption that a satisfactory drainage solution exists when this has not yet been demonstrated.

⁴¹ Victorian Planning Authority, *Greater Avalon Employment Precinct Background Report* (Draft, November 2025), 42; 49-53.

⁴² City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 18-21.

⁴³ Victorian Planning Authority, *Greater Avalon Employment Precinct Background Report* (Draft, November 2025), 43-48.

⁴⁴ Hansen Partnership Pty Ltd and Ratio Consultants Pty Ltd, *Greater Avalon Employment Precinct: Development Plan Overlay Position Paper* (Report prepared for Victorian Planning Authority, November 2025), 3-4.

⁴⁵ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 8.

Geelong's submission is clear that, given the "environmental intricacies and complexities of the area", key outstanding issues should be resolved prior to the amendment progressing, rather than deferred to later development plan approval⁴⁶. Geelong specifically calls for completion of additional stormwater and Ramsar impact assessments, revision of the NVPP and biodiversity work, and clearer agreement mechanisms before rezoning.⁴⁷ That position is especially important because Appendix 1 contains detailed recommended changes to the DPO to improve clarity and relocate or expand critical requirements, including the Drainage and Stormwater Management Strategy, asset management, open space, ESD and infrastructure contributions material⁴⁸.

In relation to urban design, subdivision and design outcomes, it is appropriate that GAEP West be controlled through both DPO50 and DDO53. The DPO should do the strategic and integrated work; the DDO should control permit-stage built form, landscaping, setbacks, lighting and site layout. That division appears sensible. Geelong generally supports the DDO subject to stronger design objectives, clearer setbacks, landscape buffers, canopy planting, light spill control, and more explicit protection of residential, farming and conservation interfaces⁴⁹.

Appendix 1 also proposes a new Open Space and Landscape Masterplan, including a 30 per cent public realm canopy target, local parks, linear trails, landscape entrance treatments and usable open space design⁵⁰. Those recommendations materially improve the ordinance and better align it with the objective of a high amenity employment precinct, rather than a utilitarian industrial estate.

On interface outcomes for Rural Living Zone land west of Avalon Road, Geelong expressly seeks greater clarity around the residential/farming/industrial interface, including a minimum 25 metre linear reserve along Avalon Road, landscaped off-road shared path, stronger setbacks, glare control, light baffling and, if necessary, consideration of a lighter industrial interface treatment⁵¹. Geelong highlights that through these refinements the current controls can be acceptable.

⁴⁶ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 12-15.

⁴⁷ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 3, 15-17.

⁴⁸ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 18-34.

⁴⁹ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 10-11.

⁵⁰ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 49-50.

⁵¹ City of Greater Geelong, *Submission to Victorian Planning Authority: Greater Avalon Employment Precinct (GAEP) Amendment C477ggee* (Submission No 56, November 2025), 8-27.

GAEP North should be treated similarly in principle but not excluded in practice. The planning logic that supports a DPO pathway for GAEP West also supports a staged DPO or equivalent strategic control for GAEP North once further technical work is done. The present amendment should not treat GAEP North as permanently beyond the ordinance framework. Rather, it should preserve a clear statutory pathway for GAEP North to be brought in once drainage, biodiversity and transport investigations are completed, specifically as GAEP West itself has not undertaken all of these investigations.

In principle, the ordinance framework should factor in the recommendations of Geelong council. GAEP North should be treated as a candidate for the same DPO-based approach.

6. Conclusion

The evidence before the Panel demonstrates that the planning framework for the Greater Avalon Employment Precinct remains incomplete in several respects. Submissions from Melbourne Water, the City of Greater Geelong and the Department of Energy, Environment and Climate Action collectively confirm that key matters including drainage feasibility, hydrological impacts and biodiversity offsets remain unresolved even for the currently exhibited GAEP West precinct. In those circumstances it would be premature to treat GAEP West as the sole viable employment land supply while excluding GAEP North from further consideration in the short term.

The central issue raised by this submission is not whether GAEP North should immediately proceed to rezoning, but whether the precinct should be excluded from the current planning scheme amendment before the necessary technical investigations have been undertaken. At present, GAEP North has not been afforded the opportunity to demonstrate a compliant drainage solution, undertake a detailed biodiversity assessment or present a structured Development Plan Overlay framework comparable to that proposed for GAEP West. The absence of such investigations should not be interpreted as evidence that the precinct is unviable or incapable of development.

Planning decisions affecting strategic employment land should be based on a complete evidentiary record. As currently framed, the Amendment relies heavily on long-term economic modelling assumptions and unresolved environmental frameworks while simultaneously deferring investigation of the GAEP North precinct. Such an approach risks constraining future industrial land supply and limiting the ability of the planning system to respond to changing market demand and regional economic conditions.

The Greater Avalon Employment Precinct has been strategically identified as a single integrated employment area supporting Avalon Airport and the broader Geelong region. Sound strategic planning therefore requires that the precinct be considered holistically rather than in a fragmented manner that advances one component while indefinitely deferring another. For these reasons, the submitter respectfully requests that the Panel recommend that GAEP North remain within the current planning scheme amendment for the Greater Avalon Employment Precinct and that the necessary technical investigations relating to drainage, biodiversity and infrastructure be undertaken so that the precinct may be assessed on a transparent and evidence-based basis alongside GAEP West. Allowing those investigations to occur will ensure that the ultimate planning outcome for the Greater Avalon Employment Precinct reflects a balanced assessment of environmental constraints, infrastructure feasibility and economic opportunity across the entire precinct. [REDACTED] would welcome the opportunity to commission and provide the VPA with detailed technical investigations prepared by suitably qualified consultants in order to address the current evidentiary gaps and assist the Authority and the Panel in undertaking a fully informed assessment of the GAEP North precinct.