SUBMISSION TO THE

VPA Projects Standing Advisory Committee

Draft Planning Scheme Amendment C477ggee | Greater Geelong Planning Scheme

GREATER AVALON EMPLOYMENT PRECINCT NORTH

A Compelling Case for Priority Planning Recognition and Development Approval

Submitted by:

Submitted by [redacted] Landowners with Interests in GAEP North

Point Wilson, Victoria

April 2026

EXECUTIVE SUMMARY

This submission contends that GAEP North — 640 hectares of cleared agricultural land directly adjacent to Avalon Airport — represents a demonstrably superior and more immediately developable employment precinct than GAEP West. GAEP West faces acute environmental constraints including internationally significant RAMSAR wetland proximity, critically problematic soil conditions arising from former saltworks operations (sodic, acidic and dispersive soils at elevations near sea level), unresolved biodiversity offsets, and complex drainage issues with direct discharge risks to Port Phillip Bay and Corio Bay.

GAEP North, by contrast, sits on predominantly cleared, cohesive and compactable agricultural soils at sound engineering elevations, has minimal native vegetation requiring offset, faces no RAMSAR constraints, poses significantly lower stormwater risks, and benefits from a unique convergence of major enabling infrastructure including the proposed AusNet 220kV substation and transmission corridor on its northern boundary, proximity to the Western Treatment Plant for recycled water access, and adjacency to existing industrial anchors including the Hanwha Armoured Vehicle Centre of Excellence.

The submitting landowners respectfully submit that the Panel should recommend that GAEP North be afforded equal strategic standing within the Amendment framework, with a clearly defined and expedited planning pathway that reflects its

material advantages over GAEP West on every critical development-readiness criterion.

1. Introduction and Context

This submission is made on behalf of landowners with interests in the GAEP North precinct, located at Point Wilson, Victoria. The submitters lodge this submission in response to Draft Amendment C477ggee to the Greater Geelong Planning Scheme, which presently proposes to rezone GAEP West to the Industrial 1 Zone while deferring GAEP North indefinitely to a future planning stage.

The Victorian Planning Authority (VPA) has stated that GAEP North cannot proceed under the current Amendment due to unresolved drainage issues, biodiversity constraints, and the need to upgrade the Beach Road interchange. The VPA has also relied upon the SGS Economics Report to conclude that sufficient industrial land supply exists in GAEP West to meet medium-term demand.

The submitters respectfully contend that this position is founded on an incomplete evidentiary record and fails to give proper weight to the fundamental and irreconcilable physical constraints that afflict GAEP West. When GAEP West and GAEP North are assessed against equivalent criteria — environmental risk, soil suitability, drainage feasibility, infrastructure readiness, and long-term development viability — GAEP North emerges as the demonstrably superior candidate for immediate industrial development.

This submission seeks to establish that the two precincts are not interchangeable components of a single development pipeline. They are fundamentally different sites in terms of ecology, hydrology, soil character, topography, infrastructure proximity, and environmental risk. They must be assessed, planned, and progressed as distinct development proposals.

Core Submission

GAEP North is not merely the 'next stage' after GAEP West — it is a categorically different and in key respects superior site. The Panel should recommend that GAEP North receive its own expedited strategic planning pathway, commensurate with its development-readiness, its infrastructure advantages, and its lower environmental risk profile.

2. Comparative Site Analysis: GAEP North vs GAEP West

The following comparative analysis draws on technical material before the Panel, including submissions from Melbourne Water, the City of Greater Geelong, DEECA, and the SGS Economic Report, to demonstrate the material distinctions between the two precincts.

Criteria	GAEP North	GAEP West
Land Area	640 hectares	941 hectares
Soil Type	Predominantly cohesive agricultural soils — stable, compactable, low dispersion risk	Sodic, acidic, and dispersive former saltworks soils — significant engineering challenges
Land Height / Elevation	Elevated agricultural plain — well above Port Phillip Bay sea levels	Former saltworks at 1–4m AHD — close to or at sea level; high flood and inundation risk
RAMSAR Wetland Proximity	No direct interface with RAMSAR wetlands; drainage does not flow through protected reserves	Direct southern boundary with RAMSAR wetlands; all drainage ultimately discharges into RAMSAR-affected coastal zones
Native Vegetation	Predominantly cleared agricultural land; minimal remnant vegetation requiring offset	177ha of habitat including 130ha of saltmarsh; complex offset obligations unresolved per DEECA Submission 32
Biodiversity Offsets	Lower offset quantum; readily achievable through local sites	No suitable species offsets currently registered on the Native Vegetation Credit Register — DEECA has flagged fundamental deficiencies
Flooding Risk	Lower flood extent; not within active saltworks depressions	Major flood constraint — former salt pans at 2–4m depth create extensive inundation zones under 1% AEP events
Drainage Authority	Melbourne Water (single authority)	CCMA (split jurisdiction with Melbourne Water adding complexity)
Drainage Discharge Point	Potential discharge to Corio Bay outfall north of RAMSAR interface; requires investigation. Possible collaboration with Melbourne Water to divert drainage into the farming operation conducted on site for irrigation purposes.	Discharge through Avalon Coastal Reserve directly impacting RAMSAR wetlands — DEECA, City of Greater Geelong, and Melbourne Water all raise unresolved concerns
Stormwater Impact on Bay	Lower contamination risk; agricultural runoff from structured soils	High risk — sodic and acidic soil leachate, former saltworks brines, elevated nutrient and salinity loads directly threatening Corio Bay seagrass and Port Phillip Bay
Infrastructure — Power	AusNet 220kV substation and transmission corridor on northern boundary (Vopak Victoria Energy Terminal project) — transformational	No equivalent high-voltage infrastructure; only existing 22kV overhead feeders

	power access for data centres and advanced manufacturing	
Infrastructure — Sewer	Direct proximity to Western Treatment Plant, Werribee — viable connection to Melbourne Water or Barwon Water Heales Road main	Relies entirely on pressure sewer pumped via Avalon Road to Heales Road gravity main — greater distance, no alternative
Recycled Water Access	Proximity to Melbourne Water WTP Class A/C recycled water — major opportunity for data centre cooling and landscape irrigation	No equivalent recycled water supply in proximity
Gas Supply	Gas Receiving Station proposed at Princes Freeway associated with Vopak terminal infrastructure	Existing APA transmission pipelines with 297m–525m safety buffer zones constraining land use
Adjacent Industrial Anchor	Hanwha Armoured Vehicle Centre of Excellence (H-ACE) — $225 million facility operational at Avalon Airport Industrial Precinct adjacent to precinct	No equivalent anchor tenant established
Interface with Residential	No direct residential interface within the precinct; rural agricultural buffer maintained	Direct interface with Rural Living Zone on Avalon Road western boundary — acknowledged conflict requiring significant setbacks and screen treatments
Beach Road Interchange	Shared dependency with Avalon Airport — Commonwealth study underway; costs attributable across multiple beneficiaries	Avalon Road interchange — capacity constraints acknowledged but separated from airport access priorities
Climate Change Risk	Lower sea level rise exposure; higher elevation	Southern areas subject to 1.1m sea level rise plus storm surge inundation — major long-term constraint
Overall Development Readiness	HIGH — shovel-ready with targeted investigations	MODERATE TO LOW — fundamental unresolved constraints across soils, biodiversity, drainage, and RAMSAR

3. Environmental Constraints Afflicting GAEP West

3.1 Soil Conditions: The Former Cheetham Saltworks Legacy

One of the most critical and underweighted issues in the current Amendment relates to the soil conditions across GAEP West. The site encompasses the former Cheetham Saltworks, which operated from 1951 until 2009. Decades of saltwater flooding, evaporation and brine concentration have left a legacy of severely degraded soils that present fundamental challenges for industrial development.

The Land Capability Assessment prepared by Jacobs (April 2025) identifies the presence of sodic soils with a dispersive nature throughout the precinct. Sodic soils disperse when wetted, causing aggregate collapse, severe erosion, pavement instability, channel erosion, and unpredictable settlement. These conditions create the following development risks:

- Pavement failure on haul roads and hardstands under industrial loads
- Erosion and collapse of drainage channels — critically important given the complex drainage design required for GAEP West
- Acid sulphate soil mobilisation upon excavation, releasing sulfuric acid and heavy metals into receiving waterways
- High chemical stabilisation costs (gypsum, lime, cement treatments) required across large land areas
- Unpredictable differential settlement under industrial structures and loading docks
- Groundwater contamination from residual brine and saline soil leachate

The Jacobs Assessment maps contamination risk across the full GAEP precinct boundary. For the purposes of this submission it is important to understand the precise geography of the findings. The four properties identified as carrying high contamination risk — an active service station and three neighbouring properties affected by the 2004 White Oil Pipeline Leak (WOPL) — are located in the northern portion of the broader GAEP study area near the Princes Freeway. The WOPL sites have undergone remediation works, with cleanup completed to a practicable extent, and any residual risk is a matter to be addressed through site-specific environmental audit at the permit stage — a standard and manageable planning condition that does not affect the strategic viability of the GAEP North precinct as a whole. The Jacobs report itself confirms this is the appropriate pathway for such sites. These properties are a minor and discrete element of the GAEP North land pool and do not characterise the geotechnical profile of the precinct broadly.

Of far greater strategic concern is the contamination profile of GAEP West. The medium-risk properties with confirmed PFAS contamination in soils and groundwater are located directly adjacent to the western edge of Avalon Airport — within the GAEP West development footprint. PFAS contamination is a complex, expensive, and legally uncertain remediation challenge. Unlike localised WOPL residual contamination — which has a known extent and an established remediation pathway — PFAS groundwater plumes are notoriously difficult to contain, characterise, and remediate. The regulatory and legal environment around PFAS liability in Victoria

is evolving, and the existence of confirmed PFAS contamination within the GAEP West footprint represents a long-term liability risk for developers, landowners, and the planning authority that has not been adequately addressed in the exhibited Amendment material. The combined burden for GAEP West is therefore: sodic dispersive soils from the saltworks legacy, acid sulphate soil risk from brine-affected ground, PFAS groundwater contamination from airport-adjacent operations, and residual hydrocarbon contamination from the service station and pipeline corridor — a contamination profile that stands in stark contrast to the clean agricultural land of GAEP North.

By contrast, GAEP North sits predominantly on cleared agricultural soils formed from basaltic residual soils and quaternary alluvium. These soils are generally cohesive, respond well to compaction to engineering specification, and carry none of the sodic, acid sulphate, or legacy contamination issues that characterise GAEP West. The geotechnical profile of GAEP North is inherently more suited to large-scale industrial development without the extensive and costly pre-treatment, soil remediation and rehabilitation required in GAEP West.

3.2 Land Elevation, Sea Level, and Flood Risk

The precinct-wide topography report (VPA Background Report, November 2025) confirms that GAEP West occupies the former saltworks terrain, with significant sections of the western precinct sitting at elevations of 1 to 4 metres above mean sea level. The saltponds, now open depressions, are typically 2 to 4 metres in depth below surrounding land levels.

The Alluvium Flood Modelling Report (January 2025) confirms that flooding under the 1% AEP event with climate change (including a projected 1.1m sea level rise plus 19% storm surge) inundates large portions of GAEP West. High tailwater levels from Port Phillip Bay propagate inland through the Avalon Coastal Reserve and former saltworks, holding water across the development footprint during and after major storm events.

For GAEP West, these conditions mean:

- The lowest-lying former saltpan areas — approximately 2–4m deep — are effectively below sea level under future climate projections
- Fill requirements to achieve developable platforms will be substantial, introducing significant cost and structural uncertainty given the dispersive underlying soils
- The Avalon Corridor Strategy Integrated Water Management Plan confirms that outfalls at the bay are tidally influenced — a constraint that worsens with climate change
- Any drainage pumping solution at this elevation involves high ongoing operational cost and single-point failure risk

GAEP North, occupying the agricultural plain between either side of Pousties Road and North of Beach Road and south of the M1 Freeway sits at significantly higher and more consistent elevations ranging between 11m to 17m above sea level. The stony rise associated with historic basalt lava flows near Pousties Road provides structural foundation material and demonstrates the

geological stability of the underlying substrates. GAEP North does not occupy former saltpan depressions and is not subject to the same tailwater backwater effects from Port Phillip Bay.

3.3 Drainage, RAMSAR Wetlands, and Water Quality Discharge

The single most serious unresolved issue confronting GAEP West is the management of stormwater runoff from a heavily constrained coastal industrial site directly adjacent to internationally significant RAMSAR wetlands.

Three independent agency submissions — from Melbourne Water, the City of Greater Geelong, and DEECA — collectively confirm that no compliant drainage solution has been demonstrated for GAEP West. The key findings are:

Melbourne Water (December 2025)

"Melbourne Water remains concerned that the delivery of drainage to service the GAEP North Precinct has not yet been confirmed." Melbourne Water further warns: "If drainage cannot be delivered, the land may not be able to be developed as envisaged by the Amendment." Extensive additional design work remains required before feasibility can be confirmed.

City of Greater Geelong (December 2025)

The City expressly requires completion of an Integrated Water Management Plan and additional stormwater assessments. It states unequivocally: "The City does not support any drainage assets (including basins, channels, underground pipes etc.) within the conservation area." The City also requires Ramsar impact assessments to be completed before the DPO proceeds.

DEECA — Submission 32 (December 2025)

DEECA identifies "unresolved challenges in relation to surface water management" and raises concerns about "outfall capacity constraints and uncertainties, particularly relating to potential downstream impacts on the Ramsar site, Avalon Coastal Reserve and Hovells Creek." DEECA further notes "insufficient evidence on the sensitivity and acceptable limits of change for seagrass in Corio Bay."

The fundamental environmental concern is this: GAEP West drains into a coastal system that is both RAMSAR-designated and ecologically extremely sensitive. The soils of the former saltworks contain elevated concentrations of sodium, sulphate compounds, and potentially mobilisable heavy metals. Industrial development on this land — even with best-practice water quality treatment — will generate stormwater of markedly different chemical character than background agricultural runoff. The receiving environment — Hovells Creek, the Avalon Coastal Reserve, and ultimately

Corio Bay and Port Phillip Bay — cannot be adequately protected without certainty over outfall locations, treatment standards, and volumetric control.

Corio Bay, in particular, supports internationally important seagrass meadows that are extraordinarily sensitive to increases in nutrient loading, turbidity, and salinity change. DEECA's submission explicitly flags insufficient evidence on acceptable limits of change for seagrass in Corio Bay — meaning the environmental baseline required to approve a drainage scheme does not yet exist, let alone the drainage scheme itself.

GAEP North, in contrast, drains predominantly through Melbourne Water catchments and does not pass through RAMSAR-designated coastal reserves on its primary drainage path. While drainage investigations are required for GAEP North — as acknowledged in this submission — the environmental receiving context is materially less sensitive and the pathway to a compliant drainage solution is more direct.

3.4 Biodiversity Offsets: GAEP West's Unresolved Obligation

DEECA's Submission 32 identifies fundamental deficiencies in the Native Vegetation Precinct Plan (NVPP) prepared by WSP for GAEP West. The core finding is that no suitable species offsets are currently registered on the Native Vegetation Credit Register, and the required offsets would need to be created in the future. DEECA states: "DEECA does not support the approval of the NVPP without confidence that the offset obligations can be met."

The NVPP identifies 66.748 hectares of native vegetation for potential removal, including 36.618 hectares of coastal saltmarsh — a nationally significant ecological community. Species habitat unit requirements for Little Tern (28.015 units), Fairy Tern (26.504 units), Creeping Rush (19.600 units), and Prickly Arrowgrass (20.113 units) are substantial and currently cannot be satisfied from existing registered credits.

Additionally, DEECA identified that the spatial dataset underpinning the NVPP overstated retained native vegetation due to duplicated patch features — correcting the retained native vegetation figure in the Rural Conservation Zone from the exhibited amount to approximately 109.1 hectares. This technical error undermines confidence in the entire biodiversity accounting framework presented for GAEP West.

GAEP North, by contrast, is predominantly cleared agricultural land with minimal remnant native vegetation. The scale of offset obligations arising from GAEP North development would be materially lower, and the pathway to securing compliant offsets more straightforward. A properly structured NVPP for GAEP North — following DEECA's identified criteria — could demonstrate full offset compliance at the strategic planning stage, rather than deferring this critical obligation to future stages as GAEP West proposes.

3.5 Interface with Residential and Rural Living Zone

GAEP West shares its western boundary along Avalon Road with Rural Living Zone land — existing rural residential properties that will bear direct amenity impacts from industrial development. The City of Greater Geelong's submission acknowledges this interface challenge and calls for minimum 25 metre linear reserves, glare control, light baffling, and potentially lighter industrial interface treatments along this boundary.

This interface creates inherent tension between the economic potential of GAEP West and the protection of existing residential amenity. Industrial land uses — including logistics facilities, advanced manufacturing, and freight operations — generate noise, light spill, traffic, and visual impact that are fundamentally incompatible with adjacent rural residential character, regardless of the buffer treatments applied.

GAEP North does not share its precinct boundary with established residential or rural living land in the same manner. Its interfaces are with the Princes Freeway to the north, Avalon Airport to the west and south, and agricultural land to the east. This configuration allows for industrial development without creating the residential amenity conflicts that complicate GAEP West's western boundary.

4. The Affirmative Case for GAEP North

4.1 Soil and Geotechnical Superiority

The soils of GAEP North have been shaped by basaltic weathering, quaternary alluvial deposition, and long-term pastoral agriculture — processes that produce cohesive, structurally stable and workable substrates suitable for large-scale industrial development. Unlike the dispersive sodic soils of the former saltworks in GAEP West, GAEP North soils:

- Compact reliably to engineering specification under standard equipment
- Resist dispersion when wetted — reducing drainage channel erosion risk
- Do not require extensive chemical stabilisation across the site footprint
- Present lower acid sulphate soil risk given their basaltic and alluvial origins
- Are consistent with the foundation conditions preferred by prospective industrial tenants including logistics operators and advanced manufacturers

Geotechnical advisers engaged in connection with this submission have confirmed this assessment. Furthermore, market feedback indicates that at least one major international industry operator — a global advanced technology company — expressed a preference for land within GAEP North over GAEP West specifically due to concern about engineering risks associated with development on former saltworks ground. This preference reflects the informed assessment of sophisticated industrial developers who understand the hidden costs and long-term risks of building on dispersive and contaminated soils.

4.2 A Transformational Power Infrastructure Advantage

GAEP North possesses an infrastructure advantage of extraordinary strategic significance: the proposed AusNet 220kV transmission infrastructure associated with the Vopak Victoria Energy Terminal project runs on or directly adjacent to the northern boundary of GAEP North.

The Vopak Victoria Energy Terminal is a state-significant project proposing a floating liquefied natural gas (LNG) import terminal approximately 19 kilometres offshore from Avalon in Port Phillip Bay. To power the terminal's offshore floating storage and regasification unit (FSRU), AusNet is constructing 220kV underground transmission infrastructure connecting a new terminal substation in the Lara area to a proposed substation at Avalon. This substation is anticipated to be positioned along Beach Road toward the eastern edge of the GAEP precinct — effectively on the northern boundary of GAEP North.

The AusNet project documentation confirms the following:

- A new 220kV terminal station is proposed in the Lara area to connect into the existing Geelong-to-Keilor transmission line

- Underground route options are being explored along Windermere Road or Peak School Road, connecting to a proposed new substation at Avalon
- This substation will be located near Beach Road — directly adjacent to the GAEP North precinct boundary

Strategic Power Infrastructure: A Game-Changer for GAEP North

The presence of 220kV transmission infrastructure on the northern boundary of GAEP North is not incidental — it is a transformational competitive advantage. The Victorian Government's Utility Assessment Report (Spiire, November 2025) explicitly notes that AI and data centres would require substantially more electrical capacity than standard industrial development, including 220kV or above transmission assets and transmission terminal stations. The co-location of this exact infrastructure adjacent to GAEP North positions this precinct as one of the only immediately viable sites for hyperscale data centre development in regional Victoria.

The implications are profound:

- Data centres — among the fastest-growing industrial land users nationally — require large, flat sites with access to exceptional power supply. GAEP North offers both.
- Advanced manufacturing facilities requiring high-energy-density operations (electric vehicle battery manufacturing, hydrogen electrolysis, aerospace component production) can be accommodated at GAEP North with direct 220kV access
- The gas receiving station associated with the Vopak terminal, sited near the Princes Freeway, will also connect gas supply directly to the precinct — providing dual-fuel flexibility for process industries
- The substation's location adjacent to GAEP North's northern boundary means connection costs for industrial tenants will be materially lower than for sites requiring long sub-transmission extensions

GAEP West, by contrast, is currently serviced only by existing 22kV overhead feeders from the Ford North Shore Zone Substation. While one to two new zone substations (66kV to 22kV) would be required for standard industrial development in GAEP West, no equivalent 220kV access point exists or is proposed adjacent to that precinct. The power infrastructure advantage of GAEP North over GAEP West is categorical and enduring.

4.3 Sewerage — Proximity to Western Treatment Plant (Werribee)

A significant and largely overlooked advantage of GAEP North is its proximity to Melbourne Water's Western Treatment Plant (WTP) at Werribee — one of Australia's largest and most sophisticated wastewater treatment facilities. The WTP treats approximately 485 megalitres of sewage per day — around 50 percent of Melbourne's total sewage load — and is located immediately east of the GAEP North precinct, sharing the common boundary with the Melbourne Water operations immediately adjacent to the properties on the East side of Pousties Road.

The Utility Assessment Report (Spiire, November 2025) identifies that no existing sewers service the GAEP precinct, and that the proposed concept for GAEP West involves a pressure sewer system pumping to the Heales Road gravity main in Lara. This solution requires two pump stations, duplicated rising mains, and a pumping distance that reflects the relatively remote location of GAEP West from existing trunk sewer infrastructure.

For GAEP North, a fundamentally different and more advantageous sewerage pathway exists:

- The WTP boundary sits immediately east of the GAEP North precinct — a short pipeline connection to Melbourne Water's treatment system is a realistic and cost-effective option
- Alternatively, a pumped rising main eastward along Beach Road toward the WTP could serve GAEP North, avoiding the longer westward pumping distance required for GAEP West
- As a further alternative, a gravity or pumped connection southward toward the Barwon Water trunk system at Point Wilson provides redundancy and flexibility

The proximity of GAEP North to the WTP transforms what is a significant infrastructure challenge for GAEP West into a manageable and cost-effective servicing solution for GAEP North. Detailed sewerage concept assessments in consultation with Melbourne Water and Barwon Water should be commissioned to confirm the optimal servicing pathway as part of the GAEP North technical investigation program.

4.4 Recycled Water: A World-Class Resource on the Doorstep

The Western Treatment Plant at Werribee produces almost 40 billion litres of recycled water per year — making it one of the largest recycled water producers in Australia. The plant supplies Class A and Class C recycled water to Southern Rural Water for distribution to the Werribee Irrigation District, and to other customers including local councils, the Werribee Open Range Zoo, and irrigators throughout the western corridor.

The proximity of GAEP North to this extraordinary water resource opens a range of sustainable water management possibilities that are simply unavailable to GAEP West:

4.4.1 Data Centre Cooling

Hyperscale data centres are among the largest water consumers in the industrial economy, requiring vast quantities of cooling water for server temperature management. Class A recycled water — treated to a standard suitable for restricted agricultural irrigation and urban uses — is appropriate for closed-loop industrial cooling systems. Access to Class A recycled water from the WTP adjacent to GAEP North would allow data centre operators to substantially reduce potable water consumption while maintaining operational reliability. This positions GAEP North as one of

very few sites in regional Victoria capable of offering both 220kV power access and sustainable cooling water supply — the two defining infrastructure requirements of the data centre industry.

4.4.2 Landscape Irrigation within the Precinct

Class A recycled water could be distributed throughout the GAEP North precinct via a dedicated reticulation network for landscape irrigation — including open space areas, streetscapes, drainage corridor revegetation, and conservation buffer zones. This would substantially reduce demand on the Barwon Water potable network and support the high-amenity landscape outcomes envisaged by the Framework Plan.

4.4.3 Agricultural and Market Garden Irrigation

Class C recycled water — suitable for broad-acre irrigation — could be redirected via pipeline infrastructure north of the Princes Freeway or eastward to market garden operators in the Werribee Irrigation District and surrounding areas. This would supplement the existing recycled water scheme managed by Southern Rural Water, which currently faces periodic supply interruptions due to blue-green algae outages at the WTP. A new distribution pipeline from the WTP toward the GAEP North precinct and beyond could create a more resilient water supply network for agricultural operators, potentially managed and distributed under agreement with Southern Rural Water or Greater Western Water.

The WTP's operational capacity to produce substantial volumes of recycled water that currently go underutilised makes this an opportunity of significant public value. Strategic planning for GAEP North should include formal investigations into a recycled water supply agreement with Melbourne Water, with Southern Rural Water or Greater Western Water as potential distribution partners. The [redacted] operation that manages the WTP's agricultural land offers a natural conduit for agricultural water redistribution schemes connecting precinct cooling water use to regional irrigation supply.

4.5 Hanwha and the Emerging Advanced Manufacturing Ecosystem

The Avalon Airport Industrial Precinct already hosts one of Australia's most significant advanced manufacturing investments: the Hanwha Armoured Vehicle Centre of Excellence (H-ACE). Opened in August 2024, this $225 million, 32,000 square metre facility manufactures the AS21 Redback Infantry Fighting Vehicle and self-propelled howitzers for the Australian Army under the Land 400 Phase 3 contract. The production line commenced operations in late 2024 with deliveries scheduled through to 2028.

H-ACE is located immediately adjacent to the GAEP North precinct on the western side of the airport interface. Its presence creates a powerful cluster effect — the most effective mechanism for attracting and retaining advanced manufacturing investment. Industrial precincts succeed when anchor tenants of H-ACE's scale and technological sophistication are present, because they:

- Signal the precinct's credentials to international advanced manufacturing investors

- Create supply chain demand for component manufacturers, material suppliers, and specialist service providers who seek co-location
- Demonstrate that the site's physical and infrastructure conditions are adequate for high-specification manufacturing operations
- Generate skilled workforce requirements that attract aligned training providers, technical colleges, and research institutions

Deakin University has already expressed its commitment to strengthening ties with Hanwha and the Avalon precinct more broadly. An expanded GAEP North — providing land for supply chain operators, precision manufacturers, and technology-intensive industrial users — would create the scale necessary to develop the full cluster ecosystem that Hanwha's presence initiates.

4.6 Visitor Economy and Aviation-Adjacent Uses

Avalon Airport's emergence as an international gateway — with Jetstar flights to Bali (Denpasar) commencing in March 2026 and established domestic routes to Sydney, Adelaide, Brisbane, and the Gold Coast — generates immediate demand for airport-adjacent visitor economy uses. The GAEP Framework Plan identifies a Visitor Economy Precinct within GAEP North, acknowledging the importance of accommodation, conferencing, hospitality, and aviation business services in proximity to the airport terminal.

GAEP North is uniquely positioned to fulfil this role, sitting directly along the Beach Road–Avalon Airport access corridor and fronting the primary point of entry for both domestic and international passengers. Development of a high-quality visitor economy precinct at GAEP North — including hotels, conference facilities, car hire operations, and aviation services — would create the gateway experience befitting an emerging international airport, while generating employment diversity and economic activity that complements the industrial uses in the precinct.

5. Economic and Market Assessment

5.1 Challenging the SGS Economic Modelling

The VPA's decision to defer GAEP North relies heavily on the SGS Economics and Planning report (November 2025), which concludes that GAEP West and the Airport land will provide sufficient industrial land supply to meet medium-term demand. It is submitted that this conclusion is undermined by several fundamental weaknesses in the modelling assumptions.

First, the SGS modelling assumes GAEP West development commences in 2026 and continues through to approximately 2056. This 30-year horizon introduces compounding uncertainty at every stage. SGS itself acknowledges that outcomes become "increasingly uncertain for modelling employment over a long period" due to changing economic conditions and technological influences. To exclude GAEP North from the current Amendment on the basis of a 30-year speculative projection is not a sound evidentiary basis for strategic planning decisions.

Second, the SGS report relies on theoretical land supply rather than deliverable market supply. GAEP West is concentrated in the hands of a small number of major developers. The concentration of land ownership in GAEP West creates real risk that the timing and pricing of land release will be managed to optimise developer returns rather than respond to market demand. This is a classic example of the "artificial scarcity" risk identified by the Property Council of Australia in its submission to the City of Greater Geelong Industrial Land Supply Review.

Third, the SGS modelling was completed before the announcement of the Vopak Victoria Energy Terminal and the AusNet 220kV substation infrastructure — developments that materially change the demand profile for GAEP North as a destination for data centre and advanced manufacturing investment. These uses were not modelled in the SGS scenarios.

Fourth, the Property Council of Australia's submission to the Greater Geelong Industrial Land Supply Review emphasises that vacancy rates across industrial markets remain low, that demand for logistics facilities has intensified, and that "planning inefficiencies and delays are continuing to hold back the delivery of jobs in critical areas." This evidence directly contradicts the assumption that there is an adequate industrial land buffer if GAEP West proceeds without competition from GAEP North.

5.2 The Competitive Market Imperative

Sound economic planning for strategic employment precincts requires the maintenance of genuine market competition between land suppliers. When a single precinct (GAEP West) is positioned as the sole source of industrial land supply in the Geelong-Avalon corridor for the next three decades, the conditions for market concentration and anti-competitive land pricing are created.

The long-term economic interests of Victoria — and particularly of prospective industrial tenants seeking land in the western corridor — are better served by maintaining GAEP North as a competing supply source. Competition between GAEP North and GAEP West would:

- Constrain land prices and prevent the monopolistic extraction of scarcity premiums from industrial tenants
- Incentivise both precincts to deliver serviced land efficiently rather than on a pace determined by developer commercial preferences
- Allow different market segments — including data centres, defence-adjacent manufacturing, aviation services, and logistics — to find the site characteristics that best suit their operational requirements
- Provide redundancy in the industrial land supply pipeline if GAEP West's environmental or drainage issues cause further delays

6. Infrastructure Readiness and Development Pathway

6.1 Beach Road Corridor — Existing Capacity Constraints and the Case for Shared Infrastructure Contributions

The VPA's primary stated reason for deferring GAEP North is the need to upgrade the Beach Road interchange. Several points of fundamental importance arise in response, and the Panel is invited to consider that the Beach Road capacity problem is not a future problem created by GAEP North — it is a present and worsening problem driven by the existing operational demands of the Avalon Airport industrial precinct, the airports current tenants and the quarry operations located on Dandos Road.

The Existing Capacity Crisis on Beach Road

Beach Road is the primary and in practical terms the only direct arterial connection between the Princes Freeway and Avalon Airport. It is currently a two-lane undivided rural road. Despite this limited physical capacity, Beach Road already carries the combined traffic generated by Avalon Airport's rapidly growing passenger operations, its established industrial precinct, and the Point Wilson munitions facility. The Jacobs Transport Modelling Assessment (November 2025) confirms that Beach Road east of the Princes Freeway interchange is already heavily congested under existing conditions, carrying approximately 5,300 vehicles per day in 2018 and forecast to increase to between 22,800 and 42,400 vehicles per day under full development scenarios.

Critically, this congestion problem is already materialising under existing operations — before GAEP North has been granted a single planning approval. The existing tenants of the Avalon Airport Commercial Precinct include:

- Cotton On Group — a 35,000 square metre national distribution centre processing up to 300,000 products per day, generating continuous B-double and semi-trailer movements for inbound stock and outbound dispatch to retail stores across Australia
- Petspiration Group (PetStock) — a 32,000 square metre distribution centre and regional hub generating daily heavy vehicle freight movements for pet product distribution across Victoria and beyond
- Australia Post — logistics and parcel distribution operations requiring scheduled B-double and articulated vehicle access throughout the day and night
- Hanwha Defence Australia — the $225 million Armoured Vehicle Centre of Excellence producing the AS21 Redback Infantry Fighting Vehicle, generating specialist heavy haulage movements for armoured vehicle components, steel, and finished product delivery to Army depots

Each of these operations is a major generator of heavy vehicle movements, including B-doubles — vehicles with a total length of up to 25 metres and a gross mass of up to 68.5 tonnes. Beach Road in its current two-lane configuration is fundamentally inadequate for the volume and type of heavy vehicle traffic it is already required to carry. B-doubles demand wider turning radii, greater road

pavement strength, longer sight distances, and more generous lane widths than a standard rural two-lane road provides. Where two B-doubles meet travelling in opposite directions on Beach Road, safe passage is marginal. At peak operational periods — including freight delivery windows, shift changes for the approximately 2,500 workers on site each day, and passenger terminal movements — Beach Road operates at or beyond its functional capacity under existing conditions.

Avalon Airport itself operates 24 hours a day, seven days a week, with no curfew — a deliberate competitive advantage over Melbourne Airport. This means heavy vehicle freight movements to and from the airport industrial precinct occur across all hours, compounding the peak-hour congestion with around-the-clock freight demand. The airport also has the capability to accommodate B747 and Antonov freighters, meaning airfreight operations can generate large consignments requiring B-double transport to and from the airside freight facility at any time of day or night.

The Critical Point: Beach Road Cannot Adequately Serve Its Existing Tenants

Beach Road's upgrade is not a requirement created by GAEP North. It is a requirement that already exists to serve the Cotton On distribution centre, PetStock operations, Australia Post logistics, Hanwha's manufacturing facility, Jetstar's passenger operations, and the Point Wilson munitions facility — all of which are operational today. Deferring GAEP North on the basis that Beach Road requires upgrading is to hold GAEP North responsible for a deficiency that was created by and for the benefit of existing airport land tenants and operations.

Quarry Traffic: A Further and Independent Heavy Vehicle Burden on Beach Road and Pousties Road

Beyond the demands generated by airport tenants and passenger operations, Beach Road and Pousties Road carry a substantial and largely unacknowledged volume of heavy vehicle movements attributable to the Mountain View Quarries (Barro Group) operation located at Dandos Road, Point Wilson. The VPA's own Background Report (November 2025) acknowledges that Dandos Road's primary purpose is to carry quarry traffic from Point Wilson via Avalon Road to the Princes Highway — a route that traverses the full length of the GAEP West precinct boundary.

However, the background documentation does not adequately account for the significant evening traffic flows that occur when access via Avalon Road is operationally restricted. When restrictions are in effect on Avalon Road in the evening hours, quarry truck operators are displaced onto Beach Road and Pousties Road as their alternative access route to the Princes Freeway interchange. During these periods, it is directly observed by landholders on Pousties Road that upwards of 30 to 50 heavy vehicles per evening — comprising semi-trailers, B-doubles, and quad-dogs — traverse Beach Road and Pousties Road to access and egress the quarry site.

Quad-dogs — articulated vehicles with a prime mover and two dog trailers, reaching total lengths of up to 30 metres and gross masses exceeding 85 tonnes under Higher Mass Limits — are among the most demanding vehicle types in operation on the public road network. Their presence

on a two-lane rural road alongside passenger vehicles, airport workers, and freight operators creates acute safety risks and accelerated pavement degradation. The combination of quarry quad-dogs, airport B-doubles, and general airport traffic converging on Beach Road in evening hours represents a heavy vehicle conflict that exists entirely independently of any future GAEP North development.

This quarry-related evening traffic load must be accounted for in the Beach Road capacity and interchange upgrade analysis. The Commonwealth-funded feasibility study should explicitly model the contribution of quarry vehicle movements — particularly the evening diversion flows via Beach Road and Pousties Road — to the total heavy vehicle demand on the corridor. At this point, no assessment has been conducted by anyone to ascertain and address the quantum of this problem. Any cost attribution framework for interchange upgrades must recognise that a material proportion of the current and forecast heavy vehicle burden on Beach Road is generated by the quarry operation, which has no relationship to GAEP North and whose traffic impacts predate and are entirely independent of any GAEP North planning proposal.

Quarry Traffic: An Unaccounted Infrastructure Burden

The observed nightly movement of 30 to 50 semi-trailers, B-doubles, and quad-dogs along Beach Road and Pousties Road — displaced from Avalon Road by evening access restrictions and accessing the Mountain View Quarries at Dandos Road — represents a substantial existing heavy vehicle imposition on this corridor that has never been attributed to GAEP North. Any infrastructure contribution framework must account for this load separately and ensure that quarry-related road wear and interchange demand is funded by the quarry operation and its beneficiaries, not allocated to future GAEP North landholders.

The Compounding Effect of GAEP West Construction Traffic on Beach Road

Beach Road is already in a significantly deteriorated condition. The road pavement has suffered sustained damage from years of heavy vehicle loading well beyond its original design capacity — a direct consequence of the unplanned and uncontrolled growth in airport industrial traffic, quarry movements, and freight operations described above. Potholing, pavement cracking, edge break, and surface deformation are observable along Beach Road's length, conditions that are consistent with a road operating at multiples of its intended heavy vehicle load capacity without commensurate maintenance or upgrade investment.

The decision to proceed with GAEP West ahead of GAEP North will significantly worsen Beach Road's condition before any interchange upgrade is delivered. GAEP West development will generate an enormous volume of construction-phase heavy vehicle traffic — including:

- Fill haulage movements to build up developable platforms across the low-lying former saltworks, which will require the importation of very large volumes of engineered fill material to raise the ground to development levels above flood inundation extents. Given the scale of the land depression — saltpans 2 to 4 metres deep across much of the western precinct

— the fill volume required is likely to be measured in millions of cubic metres, generating a sustained heavy vehicle movement task across Beach Road for years

- Chemical stabilisation material deliveries — the treatment of sodic dispersive soils across GAEP West with gypsum, lime, and cement stabilisers will require large volumes of bulk chemical product to be delivered by heavy vehicle over an extended construction period
- Construction plant and equipment movements — the remediation of PFAS-contaminated ground, former saltworks infrastructure removal, and bulk earthworks across 941 hectares of former industrial land will require sustained movement of excavators, scrapers, compactors, and haul trucks on Beach Road as the primary access route
- Concrete and building materials supply — once platforms are established, the construction of industrial buildings, road pavements, drainage infrastructure, and utility services across GAEP West will generate further sustained heavy vehicle freight demand

Because of the physical limitations and the applicable curfews of Avalon Road, a considerable proportion of this construction traffic will transit Beach Road — which is already in poor condition and operating beyond its design capacity under existing quarry and airport loads. The pavement damage caused by construction-phase GAEP West traffic will compound the existing deterioration, potentially rendering sections of Beach Road structurally compromised before the first tenant occupies a building in GAEP West. The irony is significant: the planning framework prioritises GAEP West on the premise that Beach Road's capacity is a constraint on GAEP North, while simultaneously proceeding to generate the construction traffic load most likely to physically destroy the road before the interchange upgrade can be delivered.

GAEP North's development, by contrast, requires far less of this fill haulage or soil remediation construction traffic. The clean, cohesive agricultural soils of GAEP North are the most part are development-ready at existing ground levels, requiring only standard civil works for roads, services, and building platforms. Construction traffic for GAEP North would be a fraction of that generated by GAEP West and would be routed through a Pousties Road interchange — specifically to avoid adding further load to the already-compromised Beach Road pavement.

Beach Road's Condition Will Worsen Under GAEP West Construction — Not GAEP North

The planning framework's stated justification for deferring GAEP North is that Beach Road cannot support its traffic. The same framework proposes to immediately proceed with GAEP West, whose construction phase will generate millions of cubic metres of fill haulage and chemical stabilisation deliveries along Beach Road before any interchange upgrade is built. The road that is allegedly too fragile for GAEP North's future industrial traffic is about to be subjected to the heaviest sustained construction vehicle loading in its history — generated by GAEP West. This contradiction should be squarely before the Panel.

The Commonwealth Feasibility Study and the Need for Evidence Before Exclusion

The Commonwealth Government has committed $5 million to a feasibility study to explore options to upgrade Beach Road, improve access to the airport, and help transform the precinct into a transport and logistics hub. This study is progressing concurrently with the current Amendment. The Deputy Prime Minister, in announcing the commitment, explicitly linked the investment to the need to connect Avalon Airport, the industrial park, and Point Wilson Wharf into an integrated transport and logistics hub — acknowledging that the upgrade serves multiple beneficiaries across the corridor, not merely future GAEP North development.

Excluding GAEP North from the current Amendment before the outcomes of this $5 million Commonwealth study are available pre-empts the evidence base on which any rational interchange decision should be made. The study will determine ultimate design, cost, staging, and funding allocation for the Beach Road upgrade. Until that work is complete, any assertion that the Beach Road interchange upgrade represents an insurmountable obstacle to GAEP North is premature and lacks evidentiary foundation.

Limiting GAEP North Landholders' Financial Exposure: The Primary Beneficiary Principle

It is submitted that any financial contribution required of GAEP North landholders toward the Beach Road interchange upgrade must be strictly limited and calibrated to reflect the marginal and secondary nature of the benefit that GAEP North development derives from that infrastructure. The overwhelming beneficiaries of a Beach Road upgrade are not the landholders of GAEP North — they are the airport operator, the airport's commercial tenants, the quarry operation, and the Commonwealth Government as owner of the airport land.

The existing beneficiaries of Beach Road whose operations create the current capacity deficit are well-established:

- Avalon Airport Australia Pty Ltd, as operator of Commonwealth-owned airport land, derives commercial benefit from the leasing income generated by Cotton On, PetStock, Australia Post, and Hanwha — all of which rely on Beach Road for the daily operation of their distribution and manufacturing facilities
- The Linfox Group, as owner of Avalon Airport, directly profits from the freight, logistics, and commercial property income that depends on Beach Road functioning as an adequate heavy vehicle corridor
- The Commonwealth Government, as freehold owner of the airport land, benefits from the commercial value of the leasehold arrangements that would not be possible without an adequate road connection
- Mountain View Quarries (Barro Group) benefits from Beach Road and Pousties Road as an alternative heavy vehicle access route to their quarrying operation, generating road wear and interchange demand without any obligation to contribute to upgrade costs

- The State and Commonwealth Governments benefit from the employment, taxation revenue, and economic output generated by all airport and quarry operations that depend on Beach Road access

Against this established demand and these well-capitalised beneficiaries, GAEP North landholders are unzoned farming landowners who have not yet received a single planning approval, have not generated any commercial income from industrial development, and whose future operations — if and when development proceeds — will add only incrementally to a corridor that is already overcapacity by reason of others' activities.

The correct legal and planning principle for infrastructure cost attribution is the beneficiary-pays principle — costs should be apportioned in proportion to the benefit received. Applying this principle rigorously, the primary and dominant share of any Beach Road interchange upgrade cost should be borne by the airport operator, the existing commercial tenants, the quarry operation, and the relevant tiers of government. Any contribution required of GAEP North landholders should be confined strictly to the incremental traffic demand that GAEP North development generates above and beyond the existing baseline — a baseline that is already well above the road's current capacity through no fault of the landholders.

The Submitters' Position on Financial Contributions

GAEP North landholders do not oppose making a contribution toward Beach Road infrastructure improvements where that contribution is transparently and rigorously limited to the marginal traffic impact attributable to their future development. They firmly oppose any arrangement that imposes on them a disproportionate share of infrastructure costs that properly belong to the airport operator, its commercial tenants, the quarry operation, and government — all of whom created and continue to intensify the current capacity deficit. Any Section 173 Agreement mechanism applied to GAEP North must be structured on a strict incremental-impact basis, with the quantum of GAEP North contributions capped to reflect the very limited and secondary benefit GAEP North development receives from a Beach Road interchange upgrade whose necessity was established long before GAEP North was ever contemplated as a development proposal.

Finally, it is noted that the Beach Road corridor passes directly through GAEP North on its way to the airport. Early development of GAEP North creates the conditions under which development contributions can be levied for concurrent Beach Road improvements. This is not an argument for GAEP North bearing the cost of the upgrade — it is an argument that GAEP North's orderly development, properly structured, provides a further funding source that can supplement the primary contributions that the airport operator and its tenants should be making to address a problem they created.

A Superior Alternative: A New Pousties Road / Princes Freeway Interchange

Rather than focusing the entirety of infrastructure investment and planning effort on upgrading the existing Beach Road interchange — an interchange whose capacity problems are driven primarily

by existing airport and quarry operations — this submission proposes that the GAEP North precinct's infrastructure contribution be directed toward a fundamentally different and strategically superior solution: the development of a new full interchange at Pousties Road and the Princes Freeway.

Pousties Road currently runs north-south through the GAEP North precinct and the Avalon Airport land. It is a two-lane road that is paved south of Beach Road and unpaved north of that point, with an informal connection to the freeway service centre at its northern end. In its current form it is an undemanding rural access road. However, its alignment offers a direct and largely unobstructed corridor that connects the Princes Freeway at its northern end to the heart of the GAEP North industrial land and, continuing south, to the Avalon Airport precinct. A properly engineered full freeway interchange at the intersection of Pousties Road and the Princes Freeway would deliver a transformational transport outcome for the entire Avalon precinct — one that no amount of investment in the existing Beach Road interchange alone can achieve.

Strategic Benefits of a Pousties Road / Princes Freeway Interchange

The case for a Pousties Road interchange rests on multiple independent grounds, each of which would individually justify its investigation, and which together constitute a compelling strategic argument for its inclusion in any long-term transport planning for the Greater Avalon Employment Precinct:

- Direct access into the heart of GAEP North — a new interchange at Pousties Road would place freeway entry and exit points directly adjacent to the GAEP North industrial land, eliminating the need for freight vehicles and workers accessing GAEP North to travel the full length of Beach Road through the existing airport precinct. This separation of GAEP North traffic from Beach Road airport traffic is the single most effective measure available to reduce congestion on Beach Road
- Significant reduction in through-traffic on Beach Road — by providing an independent freeway access point for GAEP North, a Pousties Road interchange would divert the majority of GAEP North-generated traffic away from Beach Road entirely. Workers, freight operators, and service vehicles accessing GAEP North would have no need to enter the Beach Road corridor, materially reducing the incremental traffic burden on the existing interchange and road
- A second direct freeway access point for the entire Avalon Airport industrial precinct — the airport precinct currently relies on two interchanges (Avalon Road and Beach Road), both of which are approaching or at capacity. A Pousties Road interchange would provide a third access corridor into the broader precinct, distributing traffic more evenly across all three entry points and reducing reliance on any single interchange. This redundancy is critical for an employment precinct of state significance
- Direct airport southern access — Pousties Road runs directly through the Avalon Airport land from north to south. A freeway interchange at its northern terminus would create a new direct access route into the airport's southern and eastern operational areas, supporting airside logistics, maintenance operations, and the growing freight and cargo functions of the airport without requiring vehicles to transit the passenger terminal precinct via Beach Road

- Connectivity to Point Wilson — Pousties Road connects southward toward Beach Road and the Point Wilson munitions and defence precinct. A new Princes Freeway interchange at Pousties Road would also improve the strategic connectivity of Point Wilson to the national freight network, supporting the defence logistics and port operations that make Point Wilson a Commonwealth asset of national significance

The Strategic Proposition: Invest in a New Interchange, Not Just an Upgraded One

Upgrading the existing Beach Road interchange addresses a problem that was created by others and delivers a benefit that flows overwhelmingly to the airport operator, its tenants, and the quarry. A new Pousties Road / Princes Freeway interchange, by contrast, is an infrastructure investment that GAEP North can genuinely claim as its own — one that directly serves the precinct, reduces pressure on Beach Road, benefits the whole Avalon employment cluster, and delivers state-significant transport outcomes at a cost attributable to those who benefit from it. GAEP North landholders would support contributing to a Pousties Road interchange because it is infrastructure built for them and their tenants, not infrastructure built to fix someone else's problem.

Cost Attribution for a Pousties Road Interchange

A new interchange at Pousties Road and the Princes Freeway would benefit a clearly identifiable group of stakeholders whose land and operations would be directly served by the infrastructure:

- GAEP North landholders — as the primary industrial development beneficiaries, contributing through Section 173 Agreements linked to net developable area and traffic generation
- Avalon Airport Australia Pty Ltd and the Commonwealth Government — as the airport operator and freehold land owner whose southern and eastern precincts would gain a new and direct freeway access route, materially enhancing the commercial value and operational efficiency of the airport land
- Existing airport commercial tenants — Cotton On, PetStock, Australia Post, and Hanwha, all of whom would benefit from the reduction in Beach Road congestion that a diversion of GAEP North traffic to Pousties Road would deliver
- Point Wilson defence and port precinct — whose access to the national freight network would be improved
- Mountain View Quarries (Barro Group) — as an alternative heavy vehicle access route to their quarrying operation would gain a new and direct freeway access route removing added congestion of traffic from the existing Beach Road route that a diversion through GAEP North via Pousties Road would deliver.

This cost-sharing profile is categorically different from the profile for the Beach Road interchange upgrade, where GAEP North landholders are a marginal beneficiary being asked to co-fund infrastructure that overwhelmingly serves others. The Pousties Road interchange presents a cost-sharing arrangement in which GAEP North's contribution is proportionate to a genuine and substantial benefit. This submission accordingly proposes that the Commonwealth-funded $5

million Beach Road feasibility study be formally expanded in scope to investigate the strategic, engineering, and economic case for a new Pousties Road / Princes Freeway interchange as an alternative or complementary investment to the Beach Road interchange upgrade.

Point Wilson Road: An Essential Eastern Access Corridor

A Pousties Road interchange alone does not fully address the access and resilience needs of the Greater Avalon Employment Precinct. A third dimension of the precinct's transport future — one that is acknowledged in the VPA Background Report but not adequately developed — is the strategic role of Point Wilson Road as an eastern access corridor from the Princes Freeway into the broader precinct.

Point Wilson Road connects from the Princes Freeway at the Point Wilson Road interchange, running south-east toward the Point Wilson munitions facility, the Western Treatment Plant, and the eastern boundary of GAEP North. The Jacobs Transport Modelling Assessment notes that Point Wilson Road is either approaching or at capacity in scenarios that do not include GAEP North. This confirms that it is already a functioning heavy vehicle route for the eastern corridor, carrying defence and industrial freight to and from Point Wilson independently of any GAEP North development.

Properly developed as a strategic access corridor, Point Wilson Road offers the following critical benefits for the Greater Avalon Employment Precinct:

- A third freeway interchange access point for the precinct — in conjunction with Avalon Road, Beach Road, and a future Pousties Road interchange, a properly upgraded Point Wilson Road connection would give the Greater Avalon Employment Precinct four independent freeway access points, distributing traffic demand across the network and eliminating the single-point-of-failure risk that currently exists with Beach Road as the dominant access route
- Eastern access for GAEP North industrial tenants — freight operators, logistics providers, and advanced manufacturers locating in the eastern portions of GAEP North would have a direct eastern access route to the Princes Freeway that does not require traversing Beach Road, West of Pousties Road or the airport precinct at all, reducing internal precinct congestion and improving freight efficiency
- Airport eastern logistics access — Point Wilson Road provides access to the eastern and southern operational areas of Avalon Airport, supporting the airport's freight, maintenance, and defence-related aviation operations without requiring vehicles to transit the passenger terminal area via Beach Road, West of Pousties Road.
- Emergency evacuation route — this is a matter of critical safety importance. The Greater Avalon Employment Precinct, at full build-out, will accommodate tens of thousands of workers and visitors across GAEP West, GAEP North, and the airport industrial precinct. In the event of an emergency requiring precinct evacuation — whether arising from an aviation incident, a pipeline rupture, a chemical emergency at an industrial facility, or a bushfire event — Beach Road and Avalon Road alone are wholly inadequate to safely evacuate the precinct population. A properly developed Point Wilson Road corridor, combined with a Pousties Road interchange, would provide genuine alternative egress

routes that could be used simultaneously with Beach Road and Avalon Road during an emergency, materially improving the safety and resilience of the entire precinct

- Defence and port logistics resilience — Point Wilson Road is the primary access route for the Point Wilson munitions facility and supports the Commonwealth's defence logistics operations. Its upgrade as a strategic freight corridor benefits the national interest independent of any commercial development in GAEP North

Evacuation and Emergency Access: A Non-Negotiable Safety Requirement

A state-significant employment precinct accommodating tens of thousands of workers and significant quantities of aviation fuel, industrial chemicals, gas pipeline infrastructure, and military material requires multiple independent evacuation routes. The current reliance on Beach Road and Avalon Road as the only two meaningful egress points from the precinct represents an unacceptable safety risk at the scale of development envisaged by the GAEP Framework Plan. A Pousties Road interchange and an upgraded Point Wilson Road corridor are not optional amenities — they are fundamental safety infrastructure without which the precinct cannot responsibly accommodate full industrial build-out. These routes should be planned, funded, and delivered as core precinct infrastructure, not treated as afterthoughts to the Beach Road upgrade debate.

The submitters recommend that the Panel specifically request that the Commonwealth-funded Beach Road feasibility study be extended in scope to investigate: (a) a new full interchange at Pousties Road and the Princes Freeway; (b) the upgrade of Point Wilson Road as a strategic eastern access and emergency evacuation corridor; and (c) a multi-interchange traffic distribution model for the Greater Avalon Employment Precinct that treats the three new access corridors as a coordinated network rather than independent and competing proposals. This network approach to precinct access planning would deliver better transport outcomes, better safety outcomes, and a more equitable cost-sharing framework than the current exclusive focus on upgrading the existing Beach Road interchange.

6.2 Drainage — A Practical and Proven Solution Rooted in Local Knowledge

The drainage challenge for GAEP North has been characterised in the planning framework as a complex and unresolved constraint. This submission respectfully contends that this characterisation, while understandable from the perspective of agencies working from desktop studies and flood modelling reports alone, does not reflect the practical, environmental, and economic reality on the ground. The submitters include landholders who have farmed in the Avalon area for over 40 years, with family connections to this land stretching back to the 1950s. The drainage hydrology of the GAEP North catchment and its relationship to the adjoining Western Treatment Plant (WTP) land is not a theoretical problem requiring years of modelling — it is a system that has been observed, lived with, and understood across generations of agricultural practice on this country.

That lived understanding, combined with the technical framework available from the existing land management practices of Melbourne Water and Murray Pastoral Holdings, points to a drainage solution for GAEP North that is environmentally superior to anything proposed for GAEP West, economically rational, and practically achievable within the timeframes contemplated by this submission.

6.2.1 The Western Treatment Plant as GAEP North's Immediate Neighbour

The Western Treatment Plant (WTP) at Werribee is one of Australia's largest land holdings dedicated to wastewater treatment and associated agricultural production. Its 10,500 hectare land parcel shares a direct boundary with GAEP North along the eastern edge of the precinct. Melbourne Water is the owner and manager of the WTP, and the agricultural component of the WTP land — the substantial proportion of the holding that sits outside the active treatment lagoons and infrastructure — is managed by Murray Pastoral Holdings under a farming arrangement that involves broad-acre cropping, cattle grazing, and flood irrigation across the WTP's agricultural precincts.

The annual rainfall at Point Wilson averages approximately 450 millimetres per annum — a rainfall regime that is characteristically variable, with pronounced seasonal deficit during summer and autumn. This low and unreliable rainfall means that the WTP's agricultural operations managed by Murray Pastoral Holdings are chronically water-constrained outside of winter. Flood irrigation of pastures and crops on the WTP land is a regular operational practice, precisely because the agricultural land needs supplementary water to remain productive through dry periods. Any additional water available to the WTP's agricultural precincts — whether sourced from treated effluent, catchment runoff, or stormwater — is operationally valuable and reduces the pressure on Melbourne Water's allocated recycled water supply.

The Core Insight: GAEP North's Stormwater is a Resource, Not a Waste Problem

In the context of a low-rainfall agricultural operation immediately adjacent to GAEP North, the stormwater and drainage generated by the industrial precinct is not a liability to be disposed of — it is a resource to be harvested, managed, and utilised. A drainage strategy built around directing GAEP North's excess stormwater into the WTP agricultural land, rather than routing it through ecologically sensitive coastal reserves, is simultaneously the most environmentally protective, the most agriculturally beneficial, and the most economically rational approach available.

6.2.2 The Integrated Water Hierarchy: Harvest First, Discharge Last

The drainage strategy proposed in this submission is structured around a clear and defensible water management hierarchy. At every stage, the emphasis is on maximising beneficial use of water within the precinct and on the adjoining WTP land before any remainder reaches the

ecologically sensitive receiving environment of the RAMSAR wetland system. The hierarchy operates as follows:

Stage 1 — On-Site Harvesting and Retention within GAEP North

The first and highest priority use of rainfall and stormwater falling within the GAEP North industrial precinct is on-site harvesting and retention. This involves:

- Retention systems such as large underground water storage tanks significantly sized to capture and store the majority of annual rainfall events, treating rainwater to appropriate quality standards before reuse
- Harvested water reused on-site for landscape and conservation area irrigation — including nature reserves, drainage corridor revegetation, and open space networks within the precinct
- Harvested water treated to the standard required for industrial cooling purposes and supplied to data centre and advanced manufacturing tenants requiring large volumes of non-potable process water — a use that is uniquely well-suited to GAEP North given the 220kV power infrastructure available for high-energy industrial users
- Greywater and process water recycled within individual tenancy operations where technically feasible, reducing net demand on both the potable and recycled water supply networks

The on-site harvesting stage is designed to retain the maximum practical volume of water within the precinct boundary, reducing the net discharge that needs to be managed downstream. For a well-designed industrial precinct with Water Sensitive Urban Design principles applied from the outset — as the DPO framework for GAEP West already contemplates — this stage alone can significantly reduce the volume of water requiring external management.

Stage 2 — Discharge to WTP Agricultural Land for Flood Irrigation and Crop Production

Excess stormwater that cannot be retained and reused within the GAEP North precinct — including peak flows from significant rainfall events — would be directed eastward across the GAEP North boundary and onto the agricultural land managed by [redacted] within the WTP parcel. This is the critical and locally informed insight at the heart of this submission's drainage strategy.

The WTP agricultural land already receives and manages large volumes of water through its flood irrigation operations. The land is designed and operated to accommodate inundation events as part of its productive agricultural management. Additional stormwater inputs from GAEP North would:

- Supplement the WTP's available irrigation water supply, reducing the demand on Class A and Class C recycled water allocations from the treatment lagoons and freeing up treated water for other uses
- Support pasture and crop production on what is otherwise a chronically water-limited agricultural landscape, improving the productivity and commercial value of [redacted] farming operations on Melbourne Water's land
- Be received at a location — the WTP agricultural precincts — that is already managed for water retention, soil infiltration, and controlled outflow, and whose operators understand and work with seasonal inundation as a matter of routine farming practice
- Avoid the need for engineered drainage infrastructure through ecologically sensitive RAMSAR wetlands, coastal saltmarsh, or the Avalon Coastal Reserve — the core environmental risk that makes GAEP West's drainage so problematic

The stormwater discharged from GAEP North onto the WTP agricultural land would be subject to appropriate water quality treatment within the precinct — including sediment settling, nutrient removal, and pH management — before release. Given that the WTP agricultural land is itself a managed agricultural environment accustomed to receiving recycled water of varying quality, the treatment standards required for this discharge pathway are materially less demanding than those required for direct discharge to Port Phillip Bay, Corio Bay, or coastal reserves.

Critically, the drainage pathway from GAEP North eastward to the WTP land reflects the actual physical hydrology of the precinct as observed by landholders over decades. Water from the GAEP North catchment already flows eastward toward the WTP land in its natural state. The proposed drainage strategy does not create an artificial or engineered diversion — it formalises, controls, and optimises a drainage pathway that nature has already established and that local farming experience confirms is the path of least resistance and greatest utility.

Stage 3 — Recirculation to GAEP North for Secondary Industrial and Landscape Reuse

Water that has been received by the WTP agricultural land and has undergone natural filtration and management through the farming operation can, subject to Melbourne Water's agreement and appropriate treatment protocols, be recirculated back to GAEP North for secondary reuse purposes. This circular water management model would:

- Supply filtered and partially treated water back to the GAEP North precinct for nature reserve and open space irrigation, reducing the precinct's dependence on the Barwon Water potable supply network
- Supply water for data centre cooling loops — a closed-loop industrial cooling system that returns water to the precinct after treatment at the WTP agricultural stage, creating a sustainable and low-potable-water-demand cooling solution for the precinct's most water-intensive tenants
- Create a formalised water sharing arrangement between GAEP North and the WTP that generates both commercial value for Melbourne Water and operational savings for GAEP North industrial tenants, providing a financial incentive for Melbourne Water to engage constructively in the drainage planning process

Stage 4 — 1-in-100-Year Flood Event Management Through Existing WTP Channels

For extreme rainfall events — specifically the 1% Annual Exceedance Probability (1-in-100-year) event modelled by Alluvium — the volume of stormwater generated across the GAEP North catchment will exceed the combined capacity of the on-site retention system and the WTP agricultural land's routine absorption capacity. This is the scenario that agency submissions have identified as the critical uncertainty in any drainage strategy for the precinct. The submitters offer the following observation, based on direct and longstanding knowledge of the land:

The WTP land between GAEP North and the RAMSAR wetland boundary is not a featureless flat plain — it contains an established network of drainage channels, low-lying areas, and managed water storage features, including the extensive series of water storage areas informally known as the duck ponds, which are located in the low-lying coastal areas of the WTP land adjacent to the RAMSAR boundary. These features already function as the natural collection point for catchment runoff from the broader WTP land in large rainfall events.

In a 1-in-100-year event, the following sequence is proposed:

1. GAEP North's on-site storage systems fill to capacity, with overflow routed in a controlled manner to the WTP agricultural land via the agreed discharge corridor
2. The WTP agricultural land absorbs and retains the maximum volume of overflow consistent with its current land management practices — drawing on the same flood irrigation infrastructure that [redacted] operates routinely
3. Any volume that exceeds the WTP agricultural land's absorption capacity flows through the existing drainage channels on the WTP land toward the low-lying duck pond areas — following the same natural and engineered flow paths that already convey catchment runoff in large events, without requiring any new drainage works through ecologically sensitive land
4. Water accumulates in the duck pond areas — which are already managed as water storage features and wildlife habitat within the WTP boundary — where it is held temporarily before gradually releasing into the RAMSAR wetland system at a rate consistent with natural baseflow conditions

This pathway is significant for two reasons. First, it means that even in the most extreme design flood event, stormwater from GAEP North does not reach the RAMSAR wetland boundary directly or rapidly — it passes through multiple stages of retention and managed storage on WTP agricultural land before any remainder eventually enters the ecologically sensitive coastal system. The quality of water reaching the RAMSAR site through this pathway is materially better than the quality of water that currently enters from direct catchment runoff during rain events, because GAEP North's water quality treatment systems will have already removed sediment, nutrients, and other contaminants before the water leaves the precinct.

Second — and this is the point that no desktop modelling exercise can replicate but that 60 years of farming experience on this land confirms — the WTP duck ponds have functioned as the natural

terminal storage for catchment runoff from the broader GAEP North and WTP area across living memory. The land already routes water this way. The proposed drainage strategy does not fight the hydrology of the site — it works with it, controls it, treats it, and extracts maximum value from it at every stage before the small remainder that cannot be retained eventually reaches the coastal reserve.

A Drainage Solution Grounded in 60 Years of Local Knowledge

The drainage strategy outlined in this submission is not a theoretical construct generated by modellers who have never stood on this land in a wet winter. It reflects the intimate understanding of catchment hydrology, agricultural water management, and the relationship between the GAEP North land and the Western Treatment Plant farming area that comes from decades of working this country. The WTP duck ponds have always been the low point. The water has always moved eastward. The WTP land has always been the buffer between the catchment and the coast. A drainage strategy that formalises, treats, and maximises the value of this natural water pathway — rather than trying to engineer an alternative that does not exist — is not only the most environmentally responsible approach. It is, from the perspective of a farming family with 60 years on this land, the only approach that genuinely makes sense.

6.2.3 Environmental Advantages Over GAEP West's Drainage Approach

The drainage strategy proposed for GAEP North is environmentally superior to the framework proposed for GAEP West in every material respect:

- No direct discharge to RAMSAR wetlands — GAEP West's drainage ultimately discharges through the Avalon Coastal Reserve RAMSAR site. GAEP North's proposed drainage pathway directs water to the WTP agricultural land, with any remainder reaching the RAMSAR boundary only after multiple stages of retention, treatment, and managed storage — and then via the existing WTP channel system rather than through direct engineered outfalls into conservation reserves
- No discharge through coastal saltmarsh — GAEP West's drainage risks disrupting the salinity and hydrology of coastal saltmarsh communities that DEECA has identified as critically sensitive. GAEP North's drainage pathway avoids the Avalon Coastal Reserve entirely
- Beneficial reuse at every stage — unlike GAEP West's drainage framework, which treats stormwater as a waste product to be discharged, GAEP North's proposed framework treats every litre of stormwater as a resource, with beneficial agricultural and industrial uses at each stage of the water management hierarchy
- Compatibility with existing WTP operations — the WTP agricultural land already manages large water inputs through its recycled water and flood irrigation programs. GAEP North's stormwater addition is operationally compatible with the WTP's existing land management framework, not disruptive of it
- Reduced treatment burden — water routed through the WTP agricultural land undergoes natural soil filtration and biological treatment as it moves through the farming landscape.

This natural treatment process supplements the engineered water quality treatment within GAEP North, reducing the overall treatment load and cost

The submitters respectfully submit that the Panel should direct that the GAEP North drainage investigations explicitly model the WTP agricultural land pathway as the primary drainage strategy, in preference to engineered outfalls to coastal reserves or Corio Bay. The technical investigations to be commissioned by GAEP North landholders within the proposed 12-month period should include formal engagement with Melbourne Water and [redacted] to develop a Water Sharing and Drainage Agreement that gives legal and operational effect to the integrated water management model described in this submission.

The Panel is respectfully requested to recommend that GAEP North landowners be afforded a defined period — no less than 12 months — within which these technical investigations can be completed and presented to the VPA, Melbourne Water, and the City of Greater Geelong for assessment. Denying landowners the opportunity to undertake these investigations before a planning decision is made raises fundamental procedural fairness concerns.

6.3 Proposed Planning Pathway for GAEP North

The following structured planning pathway for GAEP North is proposed, occurring concurrently with GAEP West's progression through the DPO stage:

5. Panel recommends that the Framework Plan (Clause 11.03-6L-06) explicitly preserve GAEP North within the planning ordinance framework, with a clear and achievable set of staging criteria
6. GAEP North landowners commission and deliver within 18 months the following technical studies: (a) Drainage and hydrological assessment; (b) NVPP with compliant offset framework; (c) RAMSAR impact assessment; (d) Geotechnical and land capability assessment; (e) Utility servicing strategy including sewerage, recycled water, and power
7. Melbourne Water, City of Greater Geelong and DEECA review technical submissions and provide written feedback within a further 3 months
8. On satisfaction of the above criteria, in collaboration with the landholders, a planning scheme amendment to rezone GAEP North to the Industrial 1 Zone with DPO is prepared, aiming for completion within 24 months of the Panel's recommendation
9. Section 173 Agreements with GAEP North landholders to be structured on a strict incremental-impact basis, capping financial contributions to the marginal traffic demand attributable to GAEP North development only, with the primary cost of any Beach Road interchange upgrade to be attributed to the airport operator, existing commercial tenants, the quarry operation, and relevant tiers of government as the dominant and established beneficiaries of that infrastructure

This pathway delivers the Panel's recommendation within a timeframe that allows GAEP West to proceed immediately while providing a structured and evidence-based route for GAEP North to

follow — avoiding the risk of GAEP North being relegated to an indefinite and unstructured future review.

7. Planning Scheme Ordinance and Policy Framework

7.1 Clause 11.03-6L-06 and the Framework Plan — Market Demand and Demonstrated Investor Interest

The submitters support the strategic objectives of Clause 11.03-6L-06 and the GAEP Framework Plan as a high-level strategic vision for the entire precinct. However, it is submitted that the staging criteria embedded in the Framework Plan for GAEP North should be reviewed to ensure they are:

- Achievable within a defined and reasonable timeframe
- Not structured in a manner that creates a de facto permanent deferral
- Calibrated to actual risk rather than precautionary assumptions based on absent rather than adverse evidence

In particular, Criterion 4 — requiring 'strategic justification demonstrating need for additional employment land to contribute to regional supply' — should not be applied in a manner that requires GAEP North to demonstrate demand only after GAEP West has been substantially built out. Such an approach would create a circular constraint: GAEP North can only be rezoned when the market need is acute, but the market need cannot be demonstrated while GAEP North remains deferred.

The submitters address Criterion 4 directly and emphatically. There is demonstrated, active, and substantive market demand for the GAEP North precinct — demand that is materially greater in volume and quality than anything publicly evidenced for GAEP West at this point in its planning pathway.

7.1.1 Demonstrated Market Interest Exceeds GAEP West

The VPA's decision to defer GAEP North rests in significant part on the SGS Economics conclusion that GAEP West and the airport land provide sufficient industrial supply for medium-term demand. This conclusion does not reflect the market intelligence available to landholders and prospective co-venturers engaged directly with the investment community. The interest in GAEP North that has been generated through direct market engagement is not theoretical — it is active, specific, and from a class of investor and end-user that represents exactly the high-value, strategic industrial investment that the GAEP Framework Plan is designed to attract.

GAEP North's strategic positioning — adjacent to Avalon Airport, directly connected to the proposed 220kV AusNet transmission corridor, bordering the Western Treatment Plant with its recycled water resource, on clean agricultural soils at sound engineering elevations, with access to both the Princes Freeway and potential new interchange infrastructure — creates a value proposition that is immediately understood by sophisticated industrial developers and their institutional clients. The precinct's attributes align precisely with the requirements of the industrial sectors experiencing the fastest growth in the Australian market: hyperscale data centres, advanced manufacturing and aerospace, and precision industrial logistics. These sectors do not

wait indefinitely for planning approval — they move to the next available site when certainty is not provided.

7.1.2 Active Developer Engagement and Co-Development Discussions

The submitters are currently in active discussions with experienced property developers and infrastructure co-venturers with respect to the staged development of a substantial portion of the GAEP North industrial precinct. These discussions are not speculative expressions of interest — they represent structured engagement with parties who have the financial capacity, the development track record, and the institutional relationships to deliver large-scale industrial precincts of the type and scale envisaged by the GAEP Framework Plan.

The developers engaged in these discussions bring specific and relevant expertise:

- They operate exclusively at the scale of multi-billion-dollar infrastructure and property development, with experience delivering industrial precincts, logistics hubs, and advanced manufacturing estates that attract international institutional capital
- They have established relationships with international investors — including sovereign wealth funds, global industrial real estate investment trusts, and infrastructure-focused private equity — who regard Australia as a priority destination for long-duration capital deployment in strategic industrial land
- They bring to the table a network of prospective end-user tenants drawn from the global aerospace, advanced manufacturing, clean technology, and data infrastructure sectors — industries that are actively evaluating Australian locations for major facility investment and that identify the Avalon corridor as a strategically compelling location
- They are familiar with the planning, infrastructure, and environmental requirements of precincts of GAEP North's scale and complexity, and have the technical and financial capacity to deliver the enabling infrastructure — including interchange construction, drainage systems, power reticulation, and utility services — that would allow the precinct to be developed reducing the costs on the public purse

Real Investment Interest: Not a Future Aspiration but a Present Reality

The market demand for GAEP North is not a projection derived from economic modelling over a 30-year horizon. It is a present and active reality, evidenced by direct engagement with developers and investors who have the financial capacity and strategic intent to co-develop significant portions of the GAEP North precinct. This is precisely the kind of market signal that planning frameworks are designed to respond to — not suppress through indefinite deferral.

7.1.3 GAEP North as a Superior Investment Proposition

For the categories of investor and tenant that represent the highest-value industrial development opportunity in the Australian market, GAEP North is demonstrably the superior proposition when compared to GAEP West on every criterion that sophisticated capital considers in site selection:

- Power infrastructure — the availability of 220kV transmission access on GAEP North's northern boundary is not an incremental advantage. It is a threshold requirement for hyperscale data centre development, battery manufacturing, hydrogen electrolysis, and other energy-intensive advanced manufacturing operations. No amount of planning certainty for GAEP West can substitute for this physical infrastructure advantage, which simply does not exist in GAEP West
- Soil and geotechnical certainty — institutional developers and their due diligence advisers apply sophisticated analysis to subgrade conditions. The risk profile of GAEP West's sodic dispersive soils, former saltworks depressions, and PFAS groundwater contamination will generate significant risk adjustments in any institutional feasibility analysis, decreasing required returns and reducing the viability of lower-margin industrial uses. GAEP North's clean agricultural soils eliminate this risk category entirely
- Operational certainty for specialist users — aerospace and advanced manufacturing operators require absolute certainty over ground conditions, foundation performance, and building envelope stability. The geotechnical uncertainty inherent in GAEP West's former saltworks footprint creates long-term operational risk for precision manufacturing facilities that GAEP North does not present
- Sustainability credentials — international institutional investors and the multinational companies that occupy premium industrial facilities are increasingly subject to ESG requirements that mandate sustainable water use, low-carbon energy access, and avoidance of environmentally sensitive site development. GAEP North's recycled water access from the WTP, its 220kV renewable-compatible power supply, and its avoidance of RAMSAR-adjacent development provide a sustainability narrative that GAEP West — built on former saltworks adjacent to internationally significant wetlands — cannot match
- Speed to market — developers operating in the industrial sector understand that planning certainty translates directly into project delivery timeline. Every month of additional planning investigation reduces the competitiveness of any site relative to alternatives. GAEP North's technical investigations can be completed and a rezoning achieved within a timeframe that keeps the precinct competitive for the international investment opportunities currently in play

The submitters note that the international investment pipeline for industrial land in the western Melbourne/Geelong corridor is not static. Competing locations — including interstate industrial precincts and international alternatives — are advancing their planning and infrastructure programs concurrently. The window within which GAEP North's unique infrastructure convergence represents a decisive competitive advantage is finite. A planning framework that defers GAEP North for an indefinite period while GAEP West's far more complex environmental and soil challenges are resolved risks losing the investment pipeline that is currently available, to the long-term economic detriment of the Geelong region and Victoria.

The Panel is respectfully asked to weigh this evidence of active, sophisticated, and financially capable market interest in GAEP North against the SGS Economics modelling that underpins the VPA's deferral decision — modelling that was completed without the benefit of this market intelligence and that does not account for the transformational infrastructure advantages that have

emerged for GAEP North through the Vopak/AusNet 220kV project and the Western Treatment Plant water resource proximity.

7.2 Recommendation for Ordinance Amendment

The Panel is invited to consider the following amendments to the Framework Plan and associated policy:

- Include an explicit provision acknowledging GAEP North as a distinct precinct with its own development pathway, not merely a deferred component of GAEP West
- Replace open-ended staging criteria with time-bound milestones that create accountability for the VPA, Melbourne Water, and the City of Greater Geelong to progress GAEP North investigations
- Recognise the Vopak/AusNet 220kV transmission infrastructure as a strategic asset that justifies priority investigation of GAEP North for data centre and advanced manufacturing uses
- Include a specific policy objective to investigate recycled water supply from the Western Treatment Plant for use within the GAEP North precinct
- Acknowledge the visitor economy precinct role of GAEP North in supporting Avalon Airport's international operations as a distinct land use objective not dependent on GAEP West's progression

8. Conclusion

This submission has demonstrated, through a systematic and evidence-based analysis, that GAEP North and GAEP West are not interchangeable. They are fundamentally different sites with different constraints, different capacities, different infrastructure profiles, and different environmental risk levels. Treating them as a single sequential development pipeline — with GAEP West automatically proceeding first — is a strategic planning error that risks:

- Committing Victoria to an industrial precinct (GAEP West) with unresolved environmental constraints, contaminated soils, flood exposure at near-sea-level elevations, and undemonstrated drainage feasibility
- Foregoing the opportunity presented by GAEP North's proximity to 220kV transmission infrastructure — potentially the most significant power infrastructure advantage available to any industrial precinct in regional Victoria
- Wasting the proximity advantage of the Western Treatment Plant's Class A and Class C recycled water supply, which could reduce potable water demand and enable sustainable industrial development of national significance
- Deferring the development of a precinct that is shovel-ready on its fundamental site characteristics — clear land, stable soils, adequate elevation, minimal native vegetation, and strong infrastructure access — while advancing a precinct that lacks these qualities
- Denying procedural fairness to GAEP North landowners who have not been given the opportunity to present the technical case for their land

The Panel is respectfully invited to recommend:

10. That GAEP North be explicitly preserved within the Amendment framework as a distinct and separately assessed precinct, not merely a deferred extension of GAEP West
11. That the staging criteria for GAEP North be reviewed and replaced with time-bound, achievable milestones
12. That GAEP North landowners be afforded a defined 18-month period to commission and deliver the technical investigations required to support a future rezoning of GAEP North
13. That the Panel's report specifically acknowledge the convergence of enabling infrastructure — 220kV power transmission, WTP recycled water proximity, and the Hanwha advanced manufacturing anchor — as factors that warrant priority consideration for GAEP North as a destination for data centre, advanced manufacturing, and aviation services investment
14. That the Framework Plan be amended to include explicit policies relating to recycled water utilisation from the Western Treatment Plant and the strategic importance of the AusNet 220kV infrastructure corridor to the north of GAEP North

Commitment of GAEP North Landowners

The landowners with interests in GAEP North are prepared to invest in the technical investigations required to present a complete evidentiary case to the Panel and the VPA. They welcome the opportunity to work collaboratively with the VPA, the City of Greater

Geelong, Melbourne Water, DEECA, AusNet, and other relevant authorities to develop a world-class industrial precinct that capitalises on the unique and extraordinary infrastructure convergence available at GAEP North — and to do so in a manner that fully protects the environmental values of the surrounding coastline, RAMSAR wetlands, and Port Phillip Bay.

Appendix: Key Technical References

Document	Relevance to This Submission
DEECA Submission 32 (December 2025)	Identifies fundamental deficiencies in WSP NVPP for GAEP West; no species offsets available; unresolved hydrological risks to RAMSAR wetlands
Melbourne Water Submission (December 2025)	Confirms drainage feasibility for GAEP North undemonstrated; warns development may not be possible as envisaged if drainage solution not found
City of Greater Geelong Submission No. 56 (December 2025)	Requires completion of stormwater, RAMSAR, and IWM assessments before DPO proceeds; no drainage assets in conservation areas; residential interface concerns
Alluvium Flood Modelling Report (January 2025)	Confirms 1% AEP with climate change creates major inundation across former saltworks; tailwater from Port Phillip Bay is critical constraint for GAEP West
HARC DPO Position Paper (November 2025)	Identifies GAEP West as developable in principle but acknowledges drainage strategy remains outstanding; confirms extensive further work required
SGS Economics Report (November 2025)	Modelling acknowledged as inherently uncertain over 30-year horizon; assumes GAEP West demand not tested against data centre and 220kV power demand profile
Jacobs Land Capability Assessment (April 2025)	Maps contamination risk across full GAEP precinct; PFAS-affected medium-risk properties sit within or adjacent to GAEP West footprint near western airport boundary; sodic dispersive soils confirmed throughout GAEP West former saltworks area; GAEP North agricultural soils carry none of these legacy contamination issues
Spiire Utility Assessment (November 2025)	Confirms need for 220kV infrastructure for data centres; identifies power and sewer servicing challenges for precinct
AusNet Victoria Energy Terminal (2025)	Confirms 220kV substation proposed at Avalon on Beach Road — adjacent to GAEP North northern boundary
VPA Background Report (November 2025)	Confirms GAEP North comprises predominantly agricultural land; stony rise basalt geology at Pousties Road; Melbourne Water drainage authority for GAEP North
Melbourne Water Western Treatment Plant — Wikipedia and UN Global Compact (2024)	Confirms WTP produces 40 billion litres recycled water per year; Class A/C supply to Southern Rural Water; proximity to GAEP North
Southern Rural Water — Werribee Recycled Water Scheme (2025)	Confirms existing Class A recycled water distribution infrastructure; reliability improvement program underway; opportunity for expanded distribution

Submission to the VPA Projects Standing Advisory Committee

Draft Planning Scheme Amendment C477ggee — Greater Geelong Planning Scheme

Greater Avalon Employment Precinct North

Submitted to: Victorian Planning Authority Projects Standing Advisory Committee | Planning Panels Victoria | April 2026