

Planning Panel Hearing Submission
13/04/2026

Amendments C444 & C453 to the Greater Geelong Planning Scheme

 Submission on behalf of the
Head, Transport for Victoria
Version 1



VICTORIA
State
Government

Department
of Transport
and Planning



Contents

| | |
|--|-----------|
| Introduction | 2 |
| The Head, Transport for Victoria's Role and Legislation | 3 |
| Context | 4 |
| Amendment C444ggee | 4 |
| Amendment C453ggee | 5 |
| Site Context | 6 |
| Policy and Statutory Context | 6 |
| State Transport System | 7 |
| Previous Consultation | 7 |
| Public Exhibition Submissions | 7 |
| Submission | 9 |
| Impact on the State Transport Network | 9 |
| Industrial Traffic Generation Rate | 9 |
| ALCAM Assessment of Canterbury Road East Level Crossing | 13 |
| Conclusion | 14 |



Introduction

1. This submission is made by the Department of Transport and Planning (DTP) under delegation of the Head, Transport for Victoria (Head, TfV).
2. DTP is accountable for designing, planning, and building the State transport system, so that it works well today and in the future. The views of the Head, TfV were sought as Amendments C444 and C453 rely on access to the State transport network.
3. Amendment C444ggee to the Greater Geelong Planning Scheme seeks to facilitate the residential development of land within urban Geelong's Settlement Boundary and identified in the Lara Structure Plan 2011. The proposed amendment does this by rezoning land for residential development from the Farming Zone to General Residential Zone Schedule 1 (GRZ1) and land reserved for open space and drainage from Farming Zone (FZ) to Industrial 3 Zone (IN3Z) to ensure alignment with future surrounding land use. The Amendment applies the Environmental Audit Overlay (EAO) and a new schedule to the Development Plan Overlay (DPO48).
4. Amendment C453ggee to the Greater Gelong Planning Scheme seeks to facilitate the industrial and commercial development of the land in accordance with the objectives sought under the G21 Regional Growth Plan 2013 and Lara Structure Plan 2011. The proposed amendment does this by rezoning the land from the Farming Zone (FZ) to Industrial 3 Zone (IN3Z) and Industrial 1 Zone (IN1Z) and applies the Design and Development Overlay Schedule 55 (DDO55).
5. This is DTP's further submission on behalf of Head, TfV and addresses matters raised in the submissions dated 17 November 2025 to each of the amendments. The key transport related matters outlined in this submission include industrial traffic generation rates and implementation of the ALCAM level crossing risk assessment.
6. DTP requires further work to be undertaken by the proponent to ensure the safety and efficiency of the arterial road network.



The Head, Transport for Victoria's Role and Legislation

7. Ministerial Direction 11 'Strategic Assessment of Amendments' requires the Planning Authority to address the requirements of the *Transport Integration Act 2010* (TIA) and the views of any relevant agency. The TIA establishes a framework for the provision of an integrated and sustainable transport system in Victoria.
8. The Head, TfV is a statutory body established under section 64A of the TIA.
9. The Head, TfV's primary objective is to *"coordinate, provide, operate and maintain the public transport system and the road system"* consistent with the vision statement and transport system objectives.
10. The primary objectives include the following:
 - a. *to ensure, in collaboration with other transport bodies and public entities, that the public transport system and the road system operates as part of an integrated transport system which seeks to meet the needs of all transport system users*
 - b. *to manage the public transport system and the road system in a manner which supports a sustainable Victoria:*
 - i. *by seeking to increase the share of public transport, walking and cycling trips as a proportion of all transport trips in Victoria; and*
 - ii. *by actively promoting public transport to Victorian families and other members of the community as an alternative to travelling by motor car; and*
 - iii. *while seeking to give effect to subparagraphs (i) and (ii), by also seeking to improve the environmental performance and to minimise the adverse environmental impacts of the public transport system and the road system*
 - c. *to contribute to social wellbeing by providing access to opportunities and supporting liveable communities*
 - d. *to promote economic prosperity by facilitating efficient and reliable movement of public transport users, road users and goods while also supporting rail freight services*
 - e. *to improve the safety of the public transport system and the road system for the users of those systems*
11. The vision statement in section 6 of the TIA states:

"The Parliament recognises the aspirations of Victorians for an integrated and sustainable transport system that contributes to an inclusive, prosperous and environmentally responsible State."

Context

Amendment C444ggee

- 12. Amendment C444ggee rezones land to facilitate the residential development of the land in accordance with the objectives sought under the G21 Regional Growth Plan 2013, City of Greater Geelong Settlement Strategy 2020 and Lara Structure Plan 2011.
- 13. The amendment rezones at 76-156 Canterbury Road East (part), 705-765 Princes Highway (part) and 785-805 Princes Highway (part) from Farming Zone (FZ) to General Residential Zone Schedule 1 (GRZ1) and Industrial 3 Zone (INZ3); applies the Development Plan Overlay Schedule 48 (DPO48); and applies the Environmental Audit Overlay (EAO).

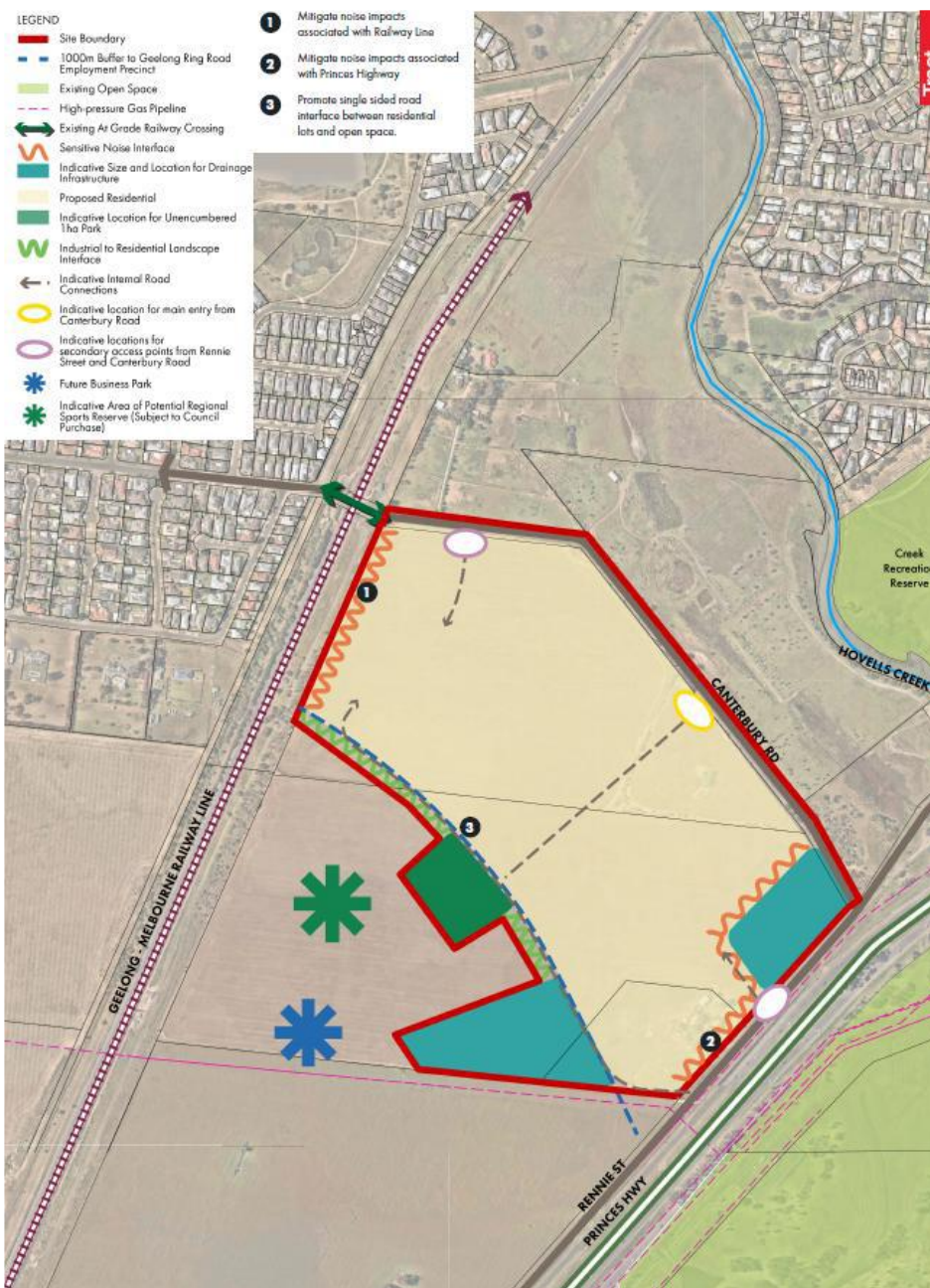


Figure 1: South-East Lara Framework Plan (Tract – November 2024)

Amendment C453ggee

14. Amendment C453ggee rezones land 76-156 Canterbury Road East (part), 785-805 Princes Highway (part), 705-765 Princes Highway (part) and 610 Rennie Street to facilitate the development of an industrial/commercial Business Park in accordance with the objectives sought under the G21 Regional Growth Plan 2013 and Lara Structure Plan 2011.
15. The amendment rezones land from Farming Zone (FZ) to Industrial 1 Zone (IN1Z) and Industrial 3 Zone (INZ3); and applies the Design and Development Overlay Schedule 55 (DDO55).

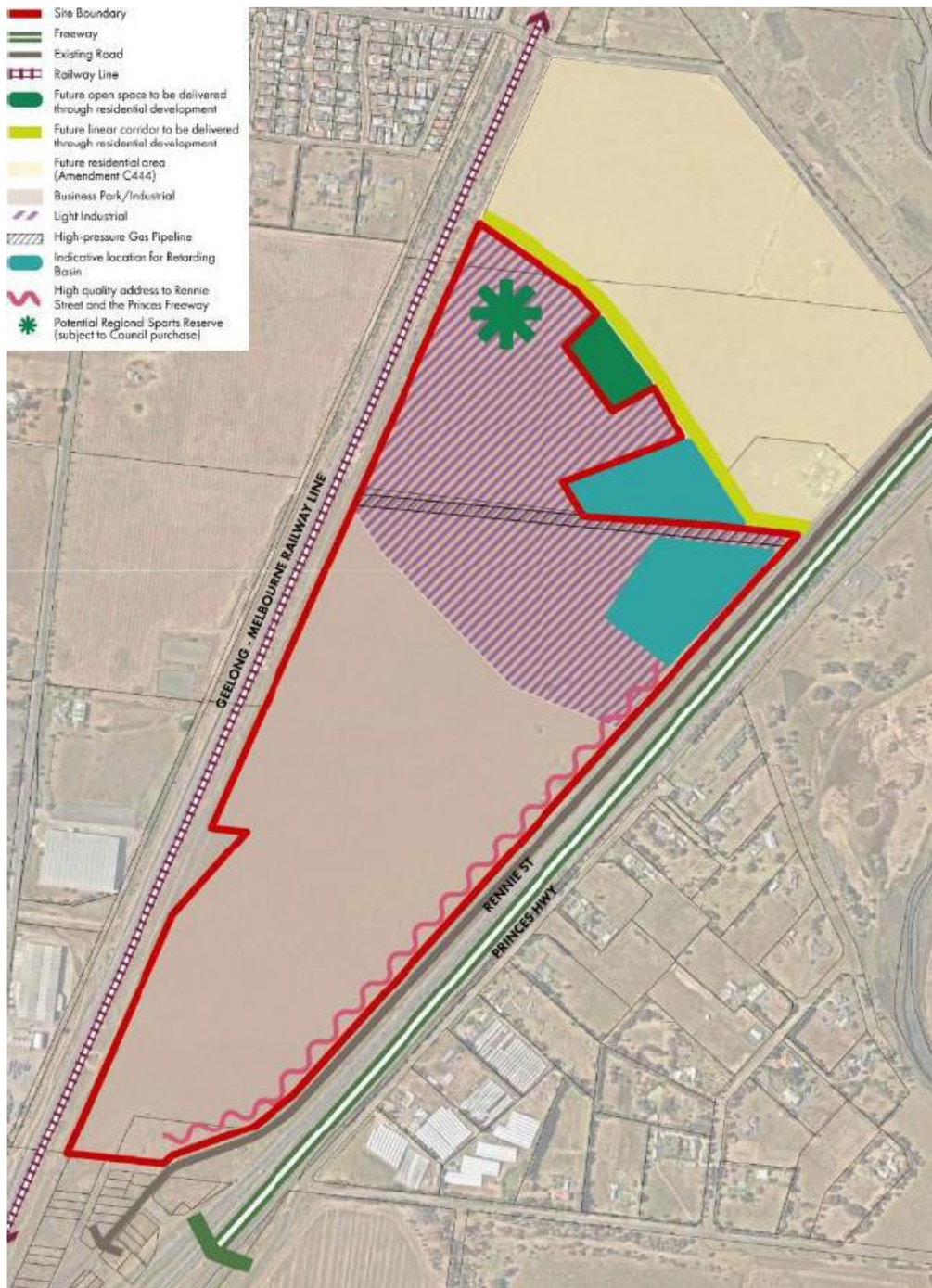


Figure 2: Amendment C453 – Business Park Amendment Concept Plan (Tract – November 2024)

Site Context

16. Clause 11.01-1L-03 'Lara' of the Greater Geelong Planning Scheme implements the Lara Structure Plan Map (Figure 3). The subject land attributed to C444ggee is identified as "Conventional Residential" in the Lara Structure Plan. The subject land attributed to C453ggee is identified as "buffer zone to Geelong Ring Road Employment Precinct", with a "potential open space opportunity" and "potential business park opportunity" in the Lara Structure Plan.

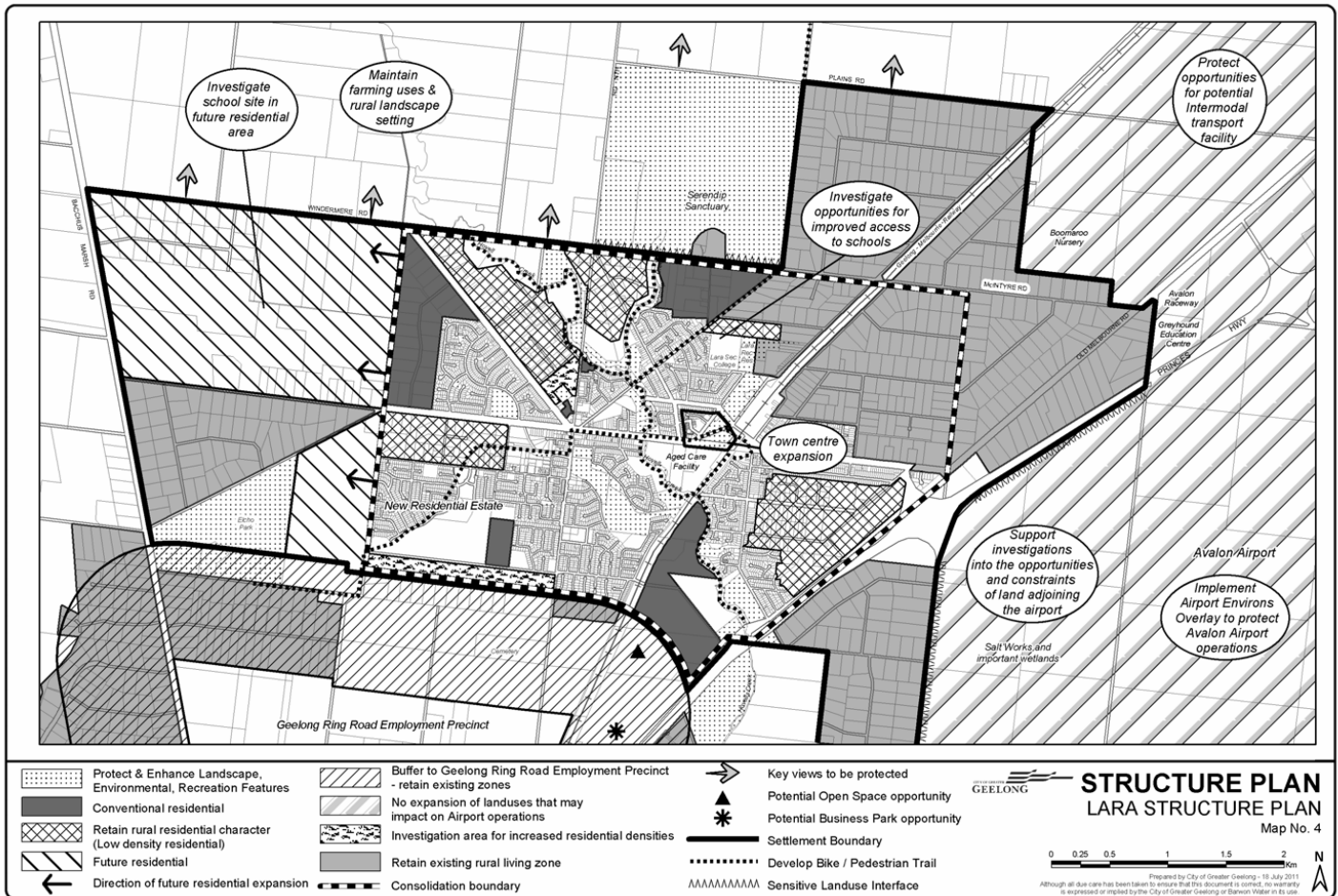


Figure 3: Lara Structure Plan in Clause 11.01-1L-03

Policy and Statutory Context

17. The Lara Structure Plan Map (Figure 3) is embedded in Clause 11.01-1L-03 of the Greater Geelong Planning Scheme. The broader Lara Structure Plan is not an incorporated document to the Greater Geelong Planning Scheme but provides relevant policy context. The Lara Structure Plan identifies improvements to the Canterbury Road East level crossing are required to improve safety.
18. Clause 18 'Transport' of the Planning Scheme states that planning should ensure a safe, integrated and sustainable transport system that:
- Provides access to social and economic opportunities to support individual and community wellbeing.
 - Facilitates economic prosperity.
 - Actively contributes to environmental sustainability.
 - Facilitates network-wide efficient, coordinated and reliable movements of people and goods.



- Supports health and wellbeing.
19. The Geelong to Melbourne rail line is zoned Transport Zone 1 (TRZ1 - state transport infrastructure). The Princes Freeway and Forest Road South are both zoned Transport Zone 2 (TRZ2 – principal road network). Clause 36.04 of the Planning Scheme includes the purpose for Transport Zone land:
- To implement the Municipal Planning Strategy and the Planning Policy Framework.
 - To provide for an integrated and sustainable transport system.
 - To identify transport land use and land required for transport services and facilities.
 - To provide for the use and development of land that complements, or is consistent with, the transport system or public land reservation.
 - To ensure the efficient and safe use of transport infrastructure and land comprising the transport system.

State Transport System

20. The subject site is bordered to the west by the Geelong-Melbourne rail line. This corridor has both broad- and standard-gauge track, accommodating V/Line passenger services between Warrnambool, Geelong and Melbourne, as well as freight services.
21. The Princes Freeway lies to the east of the subject site, running parallel to Rennie Street, which borders the subject site. Adjacent to the subject site, Princes Freeway has four traffic lanes in the north-east direction of travel, merging into three lanes approximately 800m south of Hovells Creek. In the south-west direction of travel there are three traffic lanes. The posted speed limit is 100km/h. It is part of the Principal Freight Network (PFN). Its Movement and Place (M&P) classification is Place (P) 5, Movement (M) 1, General Traffic (GT) 1, Freight (F) 1 and Cycling (C) 4. Access to the subject site is reliant on the freeway ramps that connect to Rennie Street just south of the site.
22. Forest Road South lies further west of the site, beyond the Geelong-Melbourne rail line. It is a two-lane arterial road, with a posted speed limit of 60km/h within the vicinity of the roundabout intersection with Canterbury Road East and Canterbury Road West. Its Movement and Place (M&P) classification is Place (P) 5, Movement (M) 3, General Traffic (GT) 3, Bus (B) 4, Walking (W) 3, Cycling (C) 4 and Freight (F) 3.

Previous Consultation

23. On 1 August 2022, DTP (then known as Department of Transport (DoT)) provided referral comments to City of Greater Geelong regarding Amendment C444ggee.
24. On 19 February 2024, DTP provided referral comments to City of Greater Geelong regarding Amendment C453ggee.

Public Exhibition Submissions

25. On 17 November 2025, the Head TfV lodged submissions to the public exhibition of amendments C444ggee & C453ggee. The key issues outlined in these submissions included:
- The requirement for a combined Traffic Impact Assessment (TIA) to assess the total impact of both amendments on the surrounding transport network
 - Further information required on the distribution of traffic towards the Avalon Road interchange
 - The impact of traffic generated from both amendments on the Canterbury Road East level crossing
 - The need for the future internal road network of the site to support active transport connectivity, including to the future sports reserve
 - The need for a more comprehensive shared path network



-
- The need for bus capable roads to accommodate expansion of nearby routes to service the subject site
 - Drafting changes to DPO48
 - Drafting changes to DDO55.
26. Post exhibition DTP engaged in further discussions with City of Greater Geelong and the proponent regarding matters raised in submissions made to both Amendments on 17 November 2025.
27. Council agreed to undertake additional work on key matters raised in DTP's submission, this included:
- DTP's request for a combined Traffic Impact Assessment (TIA) that accounts for the subject sites of both Amendments, to understand the cumulative traffic impact of both rezonings on the surrounding transport network.
 - DTP's request for further work to be completed to understand and manage risks associated with the Canterbury Road East level crossing, with respect to the proposed increase in traffic from the subject site.
28. DTP continued to engage with Council and the proponent regarding these matters post exhibition. It was agreed that a combined TIA would be produced by the proponent. It was also agreed that an Australian Level Crossing Assessment Model (ALCAM) assessment would be prepared by the proponent for the Canterbury Road East level crossing.
29. The combined TIA was provided to DTP on 16 March 2026. The ALCAM assessment was provided to DTP on 7 April 2026.



Submission

30. DTP remains generally supportive of both Amendments, subject to changes outlined in this submission on matters relating to State transport infrastructure.
31. Regarding the key issues submitted on during exhibition of the amendments, DTP:
- Accepts the justification provided for the distribution of traffic in the TIA, particularly as it relates to the Avalon Road interchange
 - Accepts that matters relating to the design of the future internal road network and provision of active transport connections will be addressed at a detailed level during future development plan and planning permit stages.
 - Notes that greater share path connectivity will be addressed via revisions to sections 4.12.1 and 4.12.2 of DPO48
 - Notes that all internal roads relating to C453ggee are to be bus capable and addressed accordingly in DDO55.
 - Notes Council's general acceptance of DTP's submitted drafting changes to both DPO48 and DDO55.
32. DTP will review Council's 'Day 1' versions of the amendment documentation including DPO48 and DPO55 and provide any additional commentary on the schedules as required.

Impact on the State Transport Network

33. The following matters that impact the State transport network are discussed in the submission below:
- Industrial traffic generation rate
 - ALCAM assessment of Canterbury Road East level crossing.

Industrial Traffic Generation Rate

34. Amendment C453ggee proposes to apply Industrial 1 Zone (IN1Z) and Industrial 3 Zone (IN3Z) to the subject land for this Amendment, as per the exhibited planning scheme maps (Figure 4).

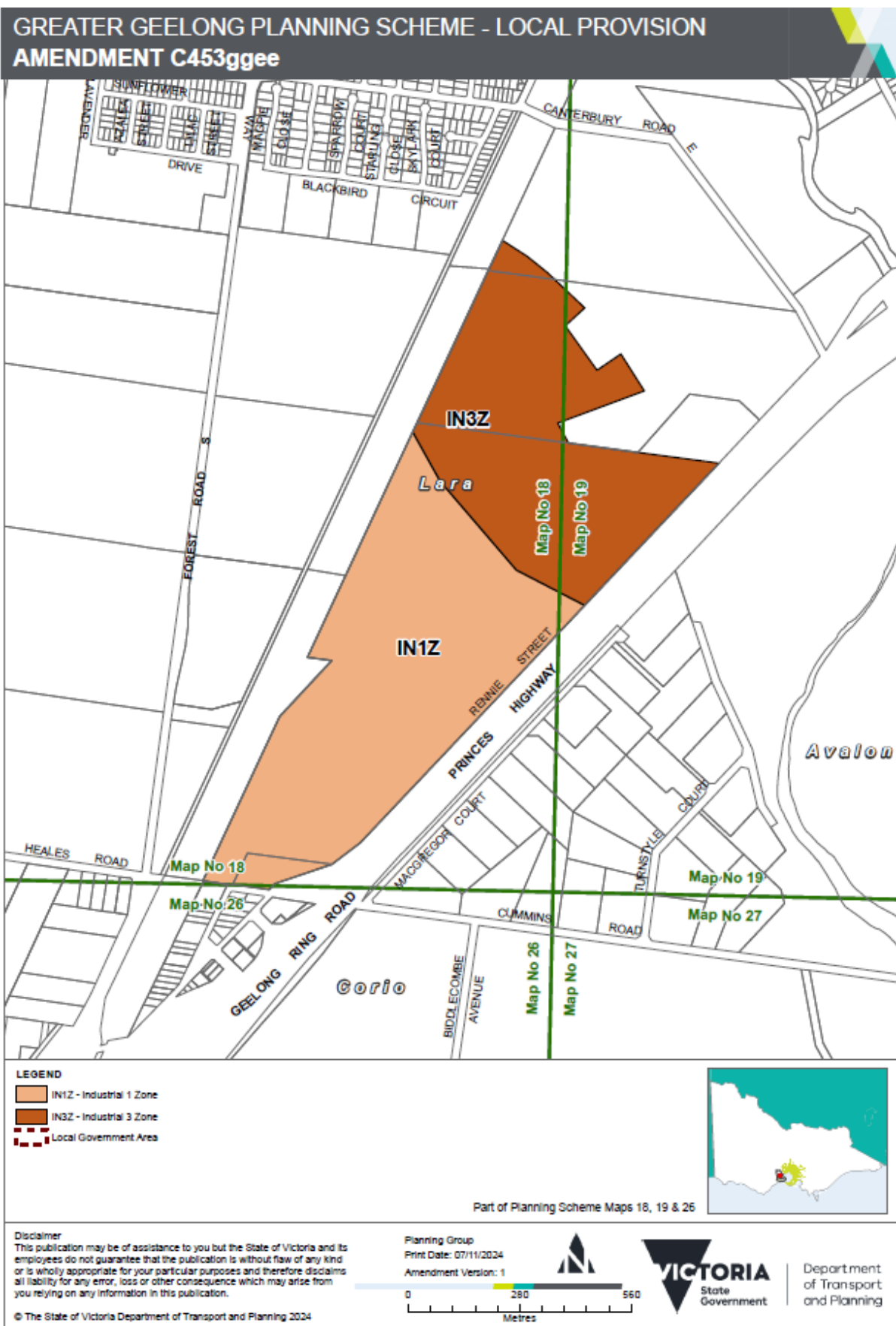



Figure 4: C453gee Planning Scheme Maps

- 
-
35. The total subject site is approximately 80 hectares in area. Of this, approximately 46.5 hectares (59%) is proposed to be rezoned to the IN1Z, and 33.5 hectares (41%) rezoned to the IN3Z. It should also be noted that approximately 4.5 hectares of land in the IN3Z is expected to be utilised for drainage purposes, reducing the developable size of IN3Z land to approximately 29 hectares (36%) of the total subject site.
 36. The purpose of the IN1Z in the Greater Geelong Planning Scheme is “to provide for manufacturing industry, the storage and distribution of goods and associated uses in a manner which does not affect the safety and amenity of local communities.” The IN1Z is a standard industrial zone that provides for a wide range of industrial uses. This can range from larger uses such as warehousing, shipping container storage, and transfer stations, to smaller uses such as offices and restricted retail, subject to planning permit requirements.
 37. The IN3Z is generally used to create an amenity buffer between the IN1Z and residential areas. IN3Z provides for industries and uses that are “compatible with the nearby community”. This includes uses such as service industries, warehousing and offices. This is the manner in which DTP understands the IN3Z has been applied via Amendment C453ggee.
 38. The IN3Z is typically applied to cater for ‘lighter’ industrial operations, often characterised by the ‘business park’ type use. The IN1Z can also be used to cater for business park type uses, subject to permit requirements.
 39. DTP are not aware of a development plan or any other documentation specifying particular industrial uses being proposed for either the IN1Z or IN3Z portions of the subject site for Amendment C453ggee. On this basis, DTP must assess the Amendment and the associated impact to the state transport network based on the allowable uses in the Greater Geelong Planning Scheme relevant to the proposed zoning.
 40. The TIA prepared by Traffix Group dated March 2026 which covers both Amendments C444ggee and C453ggee, proposes the traffic generation rates shown in Figure 5 for the industrial component of the subject site.

Given the proposed industrial estate on the subject site is estimated to have an overall floor area of 335,290m², the following rates⁴ apply:

- **AM Peak Vehicle Movements: 0.14 vehicle movements per 100m² GFA**
- **School Peak Vehicle Movements: 0.14 vehicle movements per 100m² GFA (conservatively assumed to be the same as the PM peak vehicle movements)**
- **PM Peak Vehicle Movements: 0.14 vehicle movements per 100m² GFA**
- **Daily Vehicle Movements: 1.94 vehicle movements per 100m² GFA**

Figure 5: Traffic generation rates for the industrial development (Traffix Group, March 2026)

41. These rates are adopted from Section 5.6.4 of the Transport for New South Wales (TfNSW) Guide to Transport Impact Assessment Version 1.1 (the Guide). Specifically, they are derived from the section that relates to large format warehousing. Section 4.1.2 of the TIA assumes that large format warehousing “will most likely be the predominant use of the industrial land”.
42. As is acknowledged earlier in this submission, warehousing is a permitted use in both IN1Z and IN3Z. Therefore, if warehousing is the known use of the land, this section of the Guide is relevant to apply. However, it is reiterated that DTP are not aware of a development plan or any other documentation specifying that large format warehousing, or any other particular industrial uses being proposed for



either the IN1Z or IN3Z portions of the subject site.

43. As there is no specific proposal for the industrial land, the TIA must be prepared assuming that the industrial land can be developed for any permissible use in accordance with the proposed zones.
44. In addition to the large format warehousing, Section 5.6.4 of the Guide provides traffic generation rates for other industrial land uses, including offices and business parks, which are both permitted uses of the IN1Z and IN3Z.
45. The traffic generation rates for office blocks in the Guide for regional areas are:
 - 0.99 vehicle trips/100m² Gross Floor Area (GFA) in the AM peak hour;
 - 0.96 vehicle trips/100m² GFA in the PM peak hour;
 - 9.87 vehicle trips/100m² GFA per day.
46. The traffic generation rates for business parks in the Guide for regional areas are:
 - 0.69 vehicle trips/100m² GFA in the AM peak hour;
 - 0.78 vehicle trips/100m² GFA in the PM peak hour.
47. The traffic generation rates noted above are significantly higher than the traffic generation rates adopted for the proposed IN1Z and IN3Z land for Amendment C453ggee. Because offices and business parks are permitted uses for IN1Z and IN3Z land, traffic generation rates relevant to these uses must also be considered by the combined TIA.
48. DTP recognises that it would be unreasonable to assume that the entirety of the IN1Z and IN3Z land will be comprised of higher traffic-generating industrial land uses such as office blocks and business parks, and therefore does not propose that the entirety of the proposed IN1Z and IN3Z land adopt the maximum traffic generation rates for an industrial use from the Guide (that is, the rates for office blocks) across the entire subject site. On the same basis, DTP considers it unreasonable to assume that the entirety of the IN1Z and IN3Z land will be comprised of lower traffic-generating land uses such as large format warehousing. DTP therefore submits that it is inappropriate for the combined TIA to adopt the minimum traffic generation rates from the Guide for an industrial use (that is, the network peak rates for large format warehousing) across the entire subject site.
49. The TIA prepared by Ratio (dated 31 October 2024) originally exhibited as part of Amendment C453ggee adopted the following industrial traffic generation rates:
 - 0.5 vehicle movements/100m² in the AM peak hour;
 - 0.5 vehicle movements/100m² in the PM peak hour;
 - 5 vehicle movements/100m² per day.
50. These rates are derived from a case study conducted by Ratio in 2019 of a comparable industrial estate in Truganina. The total area of the site surveyed in this study was approximately 92.2ha, "with a range of warehouse and light industrial uses occupying approximately 385,840sqm".
51. The industrial traffic generation rates in the Ratio TIA are higher than the currently proposed rates in the combined TIA for C444ggee and C453ggee, but less than the suggested rates for office block or business parks in the Guide.
52. Noting the views expressed in paragraph 47, and the potential for the IN1Z and IN3Z land to be developed for any permissible use under each zone, it is the view of DTP that higher traffic generation rates are adopted for the purpose of understanding the traffic impacts of the rezoning on the broader transport



network.

53. DTP requires further work to be undertaken by the planning authority to assess the potential impacts on the State Transport System by adopting a higher industrial traffic generation rate as outlined above.
54. Table 10 in the Traffix TIA summarises the post-development daily traffic volumes and typical road characteristic volumes for the road network surrounding the subject site. Canterbury Road East and Rennie Street south of McClelland Avenue are expected to marginally exceed their characteristic volume based on the analysis currently presented in the TIA. Adopting a more conservative industrial traffic generation rate will increase the weekday daily average traffic volume on the surrounding road network, further exacerbating the current exceedances of the key characteristic volumes, and potentially causing additional exceedances.
55. DTP seek to understand the potential impact to traffic conditions and levels of service that the exceedances of road characteristic volumes have at intersections with the state arterial network. The potential impact needs to be assessed by the TIA at the intersection of Canterbury Road East and Forest Road South, the Rennie Street freeway ramps and the intersection of McClelland Avenue and Avalon Road as it relates to the function of the freeway interchange. The TIA must then outline any required mitigation measures for locations where the traffic impact may exceed acceptable levels of service.

ALCAM Assessment of Canterbury Road East Level Crossing

56. The proposed rezoning of land under C444ggee and C453ggee will result in a significant increase in traffic volumes at the level crossing on Canterbury Road East. As a result of this increase, an ALCAM Assessment was undertaken to determine the level of risk at the site and any appropriate safety mitigation measures required.
57. DTP received the ALCAM risk report conducted by Nelson-Furnell for the Canterbury Road East level crossing on 7 April 2026. DTP accepts the methodology undertaken to assess the level of risk at the crossing.
58. To align with DTP's submission regarding traffic generation rates, the road traffic summary in section 5.1 of the report must be updated to reflect a higher traffic generation rate. The findings and recommendations of this report should then also be updated accordingly.
59. The findings of the ALCAM assessment must be incorporated into the future development plans for the site, including lot triggers for the required upgrades to the crossing.
60. Upgrades to the Canterbury Road East level crossing identified in the report are required to be completed in full by the developer at no cost to, and to the satisfaction of the Head, TfV.



Conclusion

61. DTP on behalf of Head, TfV supports Amendments C444ggee and C453ggee to rezone land for residential and industrial uses. DTP requires further work to be undertaken by the proponent to the satisfaction of Head, TfV.
62. DTP submits that:
- In the absence of a known development proposal to which a specific traffic generation rate can be applied, the industrial traffic generation rate in the combined Transport Impact Assessment be revised to consider all permissible uses of the IN1Z and IN3Z land.
 - The recommendations of the ALCAM assessment prepared by Nelson-Furnell for the Canterbury Road East level crossing must be addressed through the development plan process, and delivered by the developer at no cost to, and to the satisfaction of the Head, TfV.



Jozef Vass

Under delegation, the Head, Transport for Victoria

Associate Director Transport Strategy

Barwon South West & Grampians

Department of Transport and Planning

Date: 13/04/2026



Department
of Transport
and Planning