

16/07/2026

Attention: Sally Beers

Greater Geelong Statutory Planning Department

Subject: PP-194-2021/A

Land: 125-135 Argyle Street, Little River

[REDACTED] continues to act on behalf of the landowner. This submission has been prepared in response to Council's request for further information dated 20 May 2026 in relation to the above planning permit application. Below are a list of attached documents and a written response to this request:

- Revised Application Plans;
- Revised Planning Report;
- Revised Whole Farm Plan;
- S50 Amendment Form;
- Below Written Response:

RFI Item	Response
Item 1a	The existing shed is not plumbed or connected to an existing wastewater management system.
Item 1b	The area set aside for effluent disposal is not intended to be used for grazing. A post and wire fence is to be provided around the circumference of this area.
Item 1c	The previously submitted LCA report correctly identifies the daily wastewater flow based on a two bedroom dwelling. This is referenced on Pg. 1 in bold text and at the beginning of Page 7 under Section 5.5
Item 2	Floor plans, elevations and photographs of the proposed shipping containers and structures are provided.
Item 3	The shipping containers proposed for removal are identified on the application plans.
Item 4	See Page 2 for response
Item 6	See Page 3 for response
Item 7	See revised neighbourhood and site description plan

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Item 4

A biodiversity report is not considered necessary in this instance.

The request appears to be based on the possibility that associated works, including the driveway, domestic area, effluent disposal area, fencing and service connections, may impact remnant vegetation or habitat within an area mapped as supporting Plains Grassy Woodland. However, the relevant area proposed to accommodate the effluent disposal field has been inspected and is characterised by very short, regularly maintained grass. There is no evident presence of native vegetation, larger remnant grasses, or other vegetation features that would reasonably indicate the presence of remnant Plains Grassy Woodland within this part of the site.

The photographic evidence provided demonstrates the existing condition of this area, which does not present as an area of remnant native vegetation or habitat requiring assessment under Clause 52.17. On this basis, the preparation of a biodiversity assessment would be disproportionate to the circumstances and is not warranted.

It is therefore requested that Council accept the photographic evidence provided and remove the requirement for a biodiversity report, noting that the proposal does not seek to remove native vegetation and the effluent disposal area is to be located within a maintained grassed area that does not exhibit characteristics of remnant native vegetation.



Item 6

The characterisation of the land as being used for “rural lifestyle purposes” is not accepted. The Farming Zone does not include a minimum land size that determines whether land is, or is not, capable of being used for farming purposes. While the Schedule to the Farming Zone identifies circumstances where a dwelling may be used without a permit on land exceeding 80 hectares, this does not operate to prohibit or discourage a dwelling on a smaller farming property where a dwelling is otherwise a permissible use and can be demonstrated to support the ongoing agricultural use of the land.

The submitted Whole Farm Plan confirms that the land is used as a working rural property, including for grazing, agistment, animal husbandry, feed and equipment storage, fencing and paddock maintenance, and general farm management. The plan also explains that the farming use requires regular attendance for animal care, feeding, monitoring, security and land management.

The need for a dwelling is directly linked to the operational requirements of the farm. The site accommodates upwards of 60 animals, including goats, sheep, alpacas and cattle, which require ongoing supervision, daily feeding and watering, monitoring of animal welfare, response to veterinary or emergency needs, and protection from predators or adverse weather conditions. The Whole Farm Plan specifically identifies that an on-site dwelling would support daily feeding and watering, animal welfare monitoring, emergency response, maintenance of farm infrastructure, supervision of stored materials and fodder, and general land management.

The proposed dwelling is therefore not sought as an isolated rural lifestyle outcome. It is intended to provide a permanent on-site management presence that supports the responsible and productive operation of the land. This is particularly important given that a lack of continuous livestock management has previously contributed to a decline in animal numbers on the site.

The requirement for shipping containers and ancillary shelters (see images in Appendix A) is also directly related to the farming use. There are currently five animal shelters on the land, together with shipping containers used to store hay, feed, equipment, tools, fencing materials and other items required for the management of livestock. The Whole Farm Plan makes clear that these structures are not proposed for any separate commercial, habitable or unrelated purpose, but are ancillary to and supportive of the farming use of the land.

Accordingly, the proposal should be understood as a consolidated rural land use outcome in which the dwelling and ancillary structures support the existing farming activity. The dwelling is proposed within part of the existing approved shed, rather than as a separate new dwelling elsewhere on the land, which limits the spread of built form and maintains the broader rural function of the property.

On this basis, the Whole Farm Plan is considered to adequately demonstrate the functional relationship between the farming use, the need for on-site management, and the supporting rural infrastructure proposed on the land.

The shipping containers are required to provide additional secure and weather-protected storage for materials associated with the farming use of the land. While the site contains an existing shed, part of that shed is now proposed to be retrofitted to accommodate the dwelling, which reduces the amount of internal floor area available for farm storage. The containers are therefore necessary to supplement the remaining storage capacity and ensure that feed, hay, equipment, tools, fencing materials and other livestock management supplies can continue to be stored on site in an organised and functional manner.

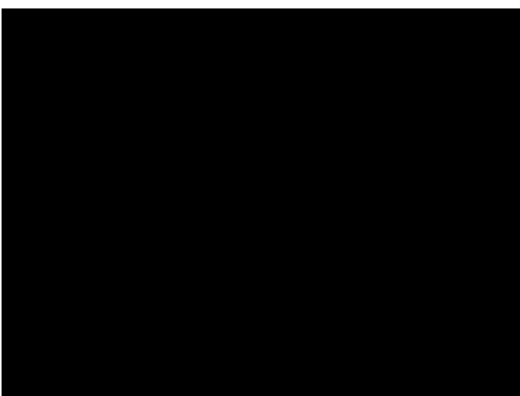
The location of the containers near the existing animal shelters is also operationally efficient. Their placement allows feed, bedding, tools and animal care materials to be stored close to the areas where they are regularly required, reducing unnecessary movement across the site and improving the day-to-day management of livestock.

It is also relevant that a number of the existing containers are proposed to be removed as part of the revised arrangement. This will rationalise the extent of container storage on the land and ensure that only the containers required to support the farming operation are retained. In this respect, the proposal represents a more orderly and consolidated arrangement of farm infrastructure, rather than an unnecessary proliferation of structures across the site.

Council should assess the proposal on the basis of the information and justification provided. Where we have clearly explained the functional relationship between the containers, the animal shelters, the storage needs of the farm and the proposed partial conversion of the shed, it is not appropriate to continue speculating as to the legitimacy of that operational need in the absence of contrary evidence. The explanation provided is reasonable, internally consistent and directly related to the farming use of the land. It should therefore be accepted at face value for the purpose of assessing the planning merits of the application.

Should any further information be required to process this application, or if there are any queries relating to this submission, please contact this office.

Per:



Appendix A – Shelter Images



Figure 1 – Shelter Example 1



Figure 2 - Shelter Example 2



Figure 3 - Shelter Example 3



Figure 4 - Shelter Example 4



Figure 5 - Storage Example