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17 April 2026

City of Greater Geelong  
Statutory Planning Department  
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<b>Planning Permit No.</b>	No. PP-461-2020
<b>Proposal</b>	Section 72 Amendment to allow buildings and works and native vegetation removal associated with the existing SSAA Eagle Park Shooting Range
<b>Address</b>	165-315 Gifkins Road, Little River

Dear Planning Department

Please find enclosed an application under Section 72 of the Planning and Environment Act 1987 to amend Planning Permit PP-461-2020 for the above property. The existing permit authorises the use and development of the land for a training centre and shooting range shelter, and the removal of native vegetation.

This amendment seeks approval for buildings and works and limited native vegetation removal associated with the continued operation of the SSAA Eagle Park Shooting Complex. The proposal involves the establishment of an additional shooting range within the existing approved complex. The new range will operate under the management and safety accreditation of SSAA Victoria and forms part of the ongoing authorised use of the land as a shooting range.

The works include construction of the new range area and berms, installation of range safety signage, provision of spill control and waste containment measures, delineation of a small crushed-rock car park, and installation of two shipping containers for storage and administration. Limited native vegetation removal is required to facilitate these works within a previously disturbed portion of the site.

Access to the new range will occur solely via the existing main entrance from Gifkins Road and the internal road network serving the wider SSAA facility. There is no separate entry point or independent operation proposed. The range will be managed in accordance with SSAA Victoria's existing operational, environmental, and safety protocols.

The activity undertaken by Proxenus Services Pty Ltd involves controlled ballistic testing within the approved range environment. These activities are ancillary to the existing use and occur entirely within the complex under SSAA Victoria's supervision. The amendment does not alter the nature or intensity of the approved use but provides an additional facility to support the safe and efficient operation of the complex.

The accompanying planning report and supporting documentation provide a full assessment of the amendment against the relevant provisions of the Greater Geelong Planning Scheme, including the Farming Zone, Bushfire Management Overlay, Significant Landscape Overlay – Schedule 1, and Clause 52.17 (Native Vegetation).

The following documents are submitted in support of this amendment request:

- SSAA Victoria letter of support (12 May 2025)
- Development plans (SSAA drawings, [REDACTED], 16 April 2026)
- Ecological Assessment ([REDACTED], March 2026)
- Bushfire Emergency Management Plan (SSAA Victoria, February 2026)



The proposal represents a modest and appropriate evolution of the existing complex, consistent with the purpose of the Farming Zone and relevant State and Local Planning Policies. It maintains the established recreational use of the land, operates under strict management and environmental controls, and achieves compliance with Clause 52.17 through the avoidance, minimisation, and offsetting of native vegetation removal.

We respectfully request that Council consider the enclosed information and progress the Section 72 amendment to approval.

Regards,



**Andrew Stubbings**

Director

AS Planning



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# 1. SUBJECT SITE

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The subject site is located at 165–315 Gifkins Road, Little River, and is formally described as Lot 1 on Plan of Subdivision 344713 (Volume 10334 Folio 651).

The land forms part of the established SSAA Victoria Eagle Park Shooting Complex, located on the southern side of Gifkins Road near the You Yangs Regional Park. The broader site accommodates multiple established shooting ranges, associated training facilities, club buildings, and internal access roads, all managed by the Sporting Shooters Association of Australia (Victoria).

The land is rural in character and gently undulating, containing a mix of cleared areas and remnant native vegetation. Existing improvements include range shelters, target mounds, fencing, and access infrastructure associated with the ongoing operation of the SSAA facility.

Vehicle access is provided via an established entrance from Gifkins Road, which serves the wider SSAA complex. Internal roads extend through the property to the various range areas and associated parking and service spaces.

The land is zoned Farming Zone (FZ) under the Greater Geelong Planning Scheme and is affected by the Bushfire Management Overlay (BMO) and the Significant Landscape Overlay – Schedule 1 (SLO1).

The Register Search Statement confirms ownership by SSAA Victoria and does not identify any restrictive covenants or agreements that would prevent the continued use and development of the land for recreational purposes.



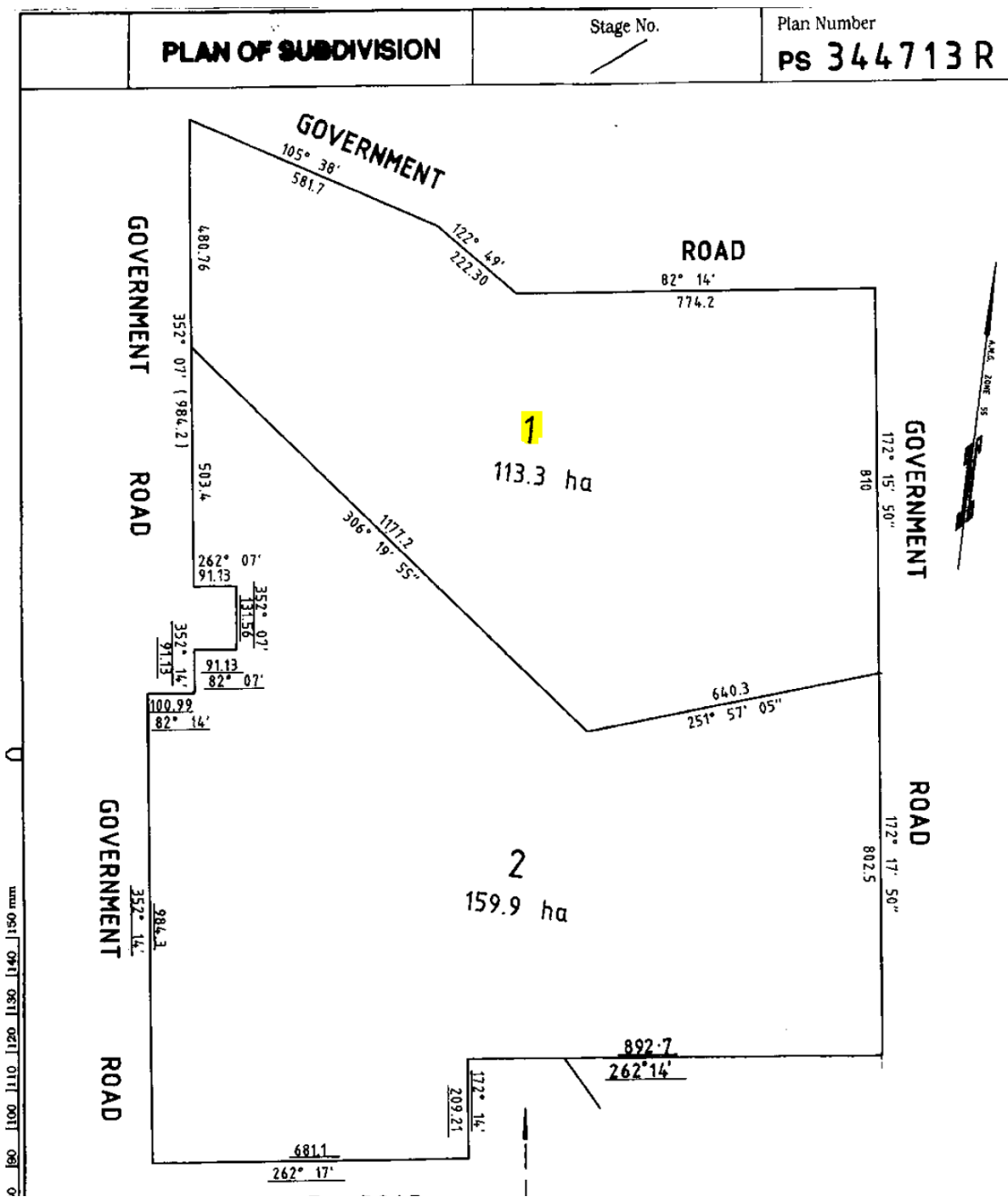


Figure 1: Plan of Subdivision, Lot 1 on Plan of Subdivision 344713 (Volume 10334 Folio 651).





Figure 2: Aerial photograph of the subject site.



## 2. SUBJECT SURROUNDS

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The subject site forms part of the established SSAA Victoria Eagle Park complex on Gifkins Road, Little River, located within a rural landscape at the northern foothills of the You Yangs. The area is characterised by a mix of large rural lots, agricultural uses, extractive industry operations, and public recreation reserves.

Immediately to the west, south and south-east of the site are various established shooting ranges and associated infrastructure forming part of the broader Eagle Park facility. To the east and north, the surrounding land comprises cleared grazing paddocks and rural allotments with sparse vegetation. Further to the south-west lies the Wurdi Youang Bushland Reserve and the You Yangs Regional Park, both forming part of a significant regional conservation and recreation landscape.

Gifkins Road provides the primary access to the site and connects to the broader rural road network serving Little River and Lara. The road is of a standard suitable for rural traffic volumes and provides direct access to the SSAA complex for members, visitors, and authorised users.

The locality maintains a distinctly rural and open character, with shooting, training, and recreational activities forming a recognised and long-established land use within the area. The existing SSAA Eagle Park Shooting Range is compatible with the surrounding rural and recreational context. The buildings and works and limited native vegetation removal proposed under this amendment will occur entirely within the boundaries of the existing complex and will not alter the overall use, appearance, or function of the wider site or its landscape setting.



### 3. PROPOSAL

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This Section 72 amendment seeks approval to amend Planning Permit PP-461-2020 for buildings and works and limited native vegetation removal associated with the continued operation of the SSAA Eagle Park Shooting Complex at 165–315 Gifkins Road, Little River.

The amendment provides for the establishment of an additional shooting range within the existing, lawfully approved complex. The new range will form part of the existing authorised use of the land and will operate under the same management, governance, and safety accreditation of SSAA Victoria. The proposal supports the ongoing safe and efficient operation of the wider facility.

The works include construction of a new range area, installation of range safety signage, minor earthworks to form protective berms, provision of spill control and waste containment facilities, delineation of a small crushed rock car park, and installation of two ancillary shipping containers to be used for storage and administration. Limited native vegetation removal is required to enable the works within a previously disturbed section of the complex.

The new range occupies an area of approximately 3,660 square metres, comprising a 3,045 square metre firing zone, a 360 square metre car parking area, and a 255 square metre utilities area. The range orientation, berm locations, and safety zones have been designed in accordance with SSAA Victoria's operational and safety standards. Two shipping containers, each measuring approximately 6 metres by 2.4 metres by 2.6 metres, will be positioned adjacent to the range for storage and administrative purposes.

All activities will continue to be accessed via the existing main entry point from Gifkins Road and the established internal road network. There is no separate access or independent operation proposed. The range will operate under SSAA Victoria's existing environmental and safety management framework, consistent with the range's current Victoria Police accreditation.

The activity undertaken by Proxenus Services Pty Ltd involves controlled ballistic testing to evaluate projectile performance and material response within the new range area. These activities are ancillary to the existing shooting range use and occur under SSAA Victoria's supervision. The amendment does not alter the nature or intensity of the approved use but adds a new range area that complements and supports the ongoing operations of the complex.

Operations will continue on non-public range days (Tuesday to Thursday) during daylight hours between 8:00 am and 6:00 pm. The range will typically accommodate up to ten personnel on site at any one time, including SSAA Victoria representatives, range management, and testing staff.

Car parking will be provided within the existing SSAA Eagle Park facility, with five designated spaces adjacent to the range area. This provision is sufficient for the scale of operations and will not affect parking availability elsewhere within the complex.

The amendment maintains the low-impact and rural character of the land and represents a modest extension of the existing facility. It ensures the continued safe and compliant operation of the SSAA complex without altering the overall land use, function, or appearance of the site.







## 4. ZONE

### 4.1. Clause 37.07 Farming Zone

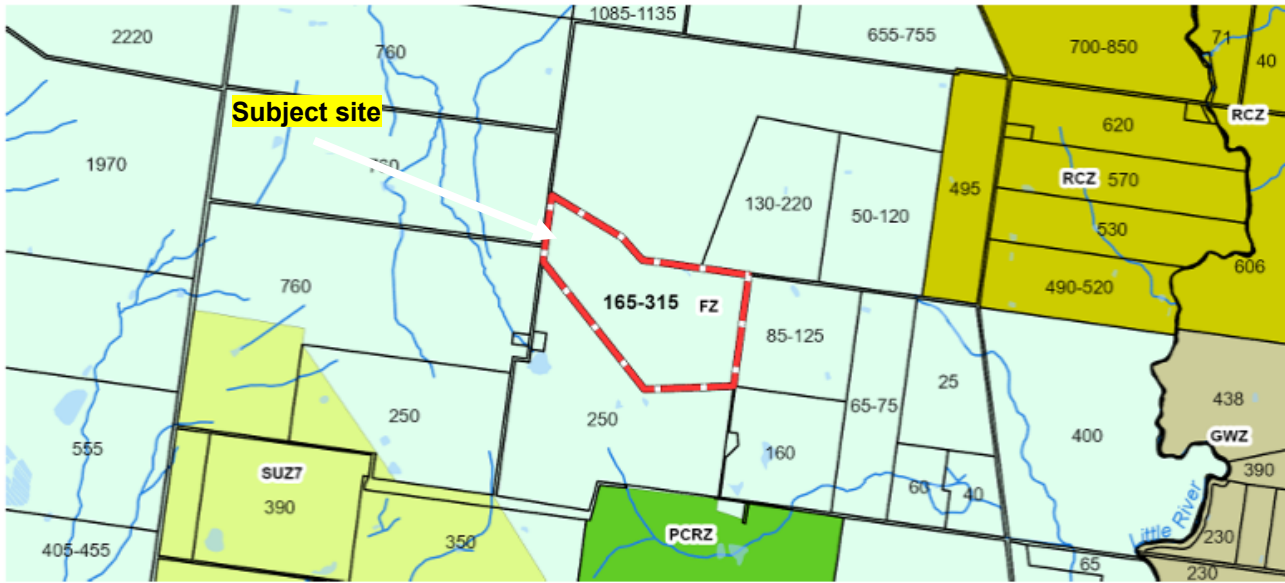


Figure 7: Zoning map.

#### Purpose:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To provide for the use of land for agriculture.
- To encourage the retention of productive agricultural land.
- To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.
- To encourage the retention of employment and population to support rural communities.
- To encourage use and development of land based on comprehensive and sustainable land management practices and infrastructure provision.
- To provide for the use and development of land for the specific purposes identified in a schedule to this zone.overlay

**Response:** The land is within the Farming Zone (FZ) under the Greater Geelong Planning Scheme. The existing SSAA Eagle Park Shooting Complex is a long-established and lawfully approved recreational and training facility operating within a managed rural environment.

This amendment seeks approval for buildings and works under Clause 37.07-4 and native vegetation removal under Clause 52.17 associated with the continued operation of the complex. No change to the existing approved use is proposed. The additional range forms part of the existing authorised use of the land for a shooting range and will operate under the management, safety accreditation, and governance of SSAA Victoria. The controlled ballistic testing undertaken by Proxenus Services Pty Ltd is ancillary in nature, occurring entirely within the existing complex under SSAA supervision.

The proposed works are modest in scope and include the development of an additional range area with associated berm formation, range safety signage, spill control and waste containment facilities, and a small car parking area. All works are confined within the boundaries of the existing complex and previously disturbed land. The amendment will not affect the site's agricultural potential, rural character, or compatibility with surrounding land uses.

The proposal satisfies the purpose of the Farming Zone by maintaining an established rural-based recreational facility that operates compatibly with nearby agricultural and open space uses. The amendment



supports the continued safe and environmentally responsible operation of the complex without introducing any new land use, building scale, or activity intensity that could compromise the objectives or landscape values of the zone.

## 4.2. Clause 42.03 – Significant Landscape Overlay Schedule 1 (SLO1)

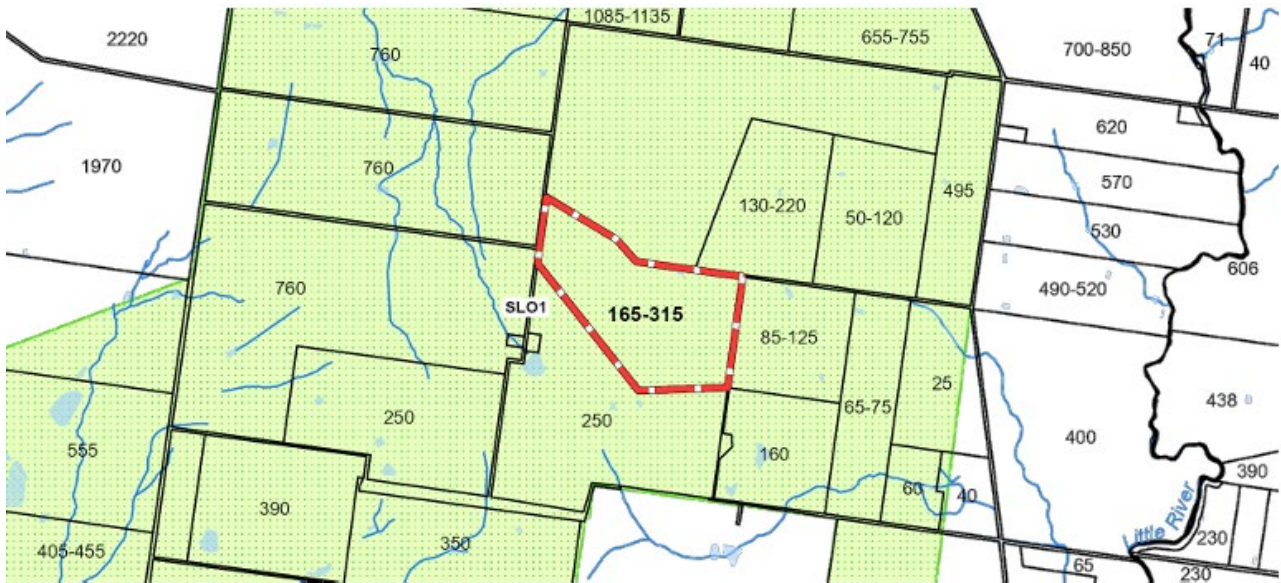


Figure 8: SLO1 Overlay map.

### Purpose

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To identify significant landscapes.
- To conserve and enhance the character of significant landscapes.

**Response:** The land is affected by the Significant Landscape Overlay – Schedule 1 (SLO1) under the Greater Geelong Planning Scheme. The overlay identifies the You Yangs and surrounding foothill areas as significant for their scenic and environmental values, including open rural views, remnant vegetation, and natural topography.

A planning permit is required under Clause 42.03-2 to construct a building or carry out works and to remove vegetation, unless exempted. This amendment includes buildings and works and limited native vegetation removal associated with the addition of an extra range within the existing SSAA Eagle Park Shooting Complex and therefore triggers a permit under this provision.

The proposed works are modest in extent and involve construction of the new range area, associated berm formation, range safety signage, provision of spill control and waste containment facilities, and delineation of a small crushed-rock car park. Two shipping containers will be installed adjacent to the range for administrative and storage purposes. All works are contained within a previously cleared and visually contained part of the established complex and will not introduce new built form, bulk, or scale that alters the existing landscape character.



Vegetation removal is confined to the minimum area necessary to accommodate the range footprint, safety berms and access, as quantified in the Ecological Assessment. The proposal avoids the removal of mature trees or vegetation that contribute to the landscape setting (the assessment confirms no large trees are affected), and offsets will be secured in accordance with the native vegetation credits identified at Appendix 3 of that report.

The proposal maintains the open rural character of the site and the wider You Yangs landscape. The works are low-scale, finished in natural tones, and screened by existing berms and vegetation. The amendment will not create visual intrusion or diminish the environmental or scenic qualities identified in Schedule 1 to the overlay. The buildings and works are compatible with the existing use and appearance of the land and are considered to satisfy the purpose and decision guidelines of Clause 42.03.

schedule 1 to clause 42.03 significant landscape overlay

#### Foothills of the You Yangs; statement of nature and key elements of landscape

This area is comprised of treeless foothills and plains at the base of the You Yangs. The You Yangs are the most prominent landscape feature in the northern area of the municipality, providing panoramic views of Geelong. The surrounding foothills and plains create an open view path to the You Yangs, visually exposing them when viewed from the surrounding basalt plains.

The key element of the landscape is its open character and contrast with the You Yangs.

#### Landscape character objectives to be achieved (Clause 2.0 of Schedule 1)

To protect and enhance the open character, contrast and scenic quality of the landscape.

To maintain an open view path to the regionally significant You Yangs.

To ensure that buildings and works are sited and designed to be non-reflective and finished in colours complementary to the natural landscape.

**Response:** The land is affected by the Significant Landscape Overlay – Schedule 1 (SLO1) under the Greater Geelong Planning Scheme, which applies to the foothills and plains surrounding the You Yangs. This area is recognised for its open rural landscape, visual contrast with the You Yangs, and its role in maintaining uninterrupted views toward the regionally significant ridgeline and granite peaks.

A planning permit is required under Clause 42.03-2 to construct buildings and works and to remove vegetation unless exempted under the schedule. The amendment involves buildings and works and limited native vegetation removal associated with the establishment of an additional range within the existing, lawfully approved SSAA Eagle Park Shooting Complex, and therefore triggers a permit under this overlay.

The nature and key elements of the landscape are defined by the open and treeless character of the foothills and plains that provide a visual foreground to the You Yangs. The proposal maintains this openness, with all works contained within an existing cleared and visually enclosed section of the complex where screening is achieved through existing berms, vegetation, and topography. The range structures are low in height, finished in natural tones, and will not interrupt view lines or introduce reflective or visually intrusive materials.

The landscape character objectives of SLO1 seek to maintain open views toward the You Yangs and to ensure that development does not compromise the scenic quality or rural landscape values of the area. The proposed amendment satisfies these objectives by:

- Locating all works within a previously disturbed and visually contained section of the complex, well removed from public vantage points.
- Avoiding new built form, bulk, or visual elements that would alter the rural openness or introduce visual intrusion.



- Confining vegetation removal to the minimum area necessary for the safety-critical range template, as detailed in the ecological report, with offsets to be secured in accordance with the native vegetation credit register.
- Ensuring that all materials and finishes are non-reflective and consistent with the natural tones of the surrounding environment.

The decision guidelines at Clause 42.03 and Schedule 1 have been considered. The proposal does not affect any high-quality vantage points, remnant indigenous vegetation of significance, or natural landforms that define the foothills of the You Yangs. No changes are proposed to the siting, height, or massing of existing infrastructure. The low-scale and well-contained nature of the works ensures that the visual and natural significance of the landscape is preserved.

The amendment maintains the existing rural landscape qualities and reinforces the visual dominance of the You Yangs within the broader view shed. The proposal therefore achieves the objectives of the Significant Landscape Overlay – Schedule 1 and represents an appropriate and low-impact continuation of the established use.

### Landscape Plan

A landscape plan is not considered necessary or appropriate for this proposal. The SLO1 schedule describes the landscape as “treeless foothills and plains at the base of the You Yangs”, with the key element being its “open character and contrast with the You Yangs”. The landscape character objectives at Clause 2.0 of SLO1 seek to protect and enhance the open character, contrast and scenic quality of the landscape, and to maintain an open view path to the regionally significant You Yangs.

The proposed works are located approximately 775 metres south-west of Gifkins Road, deep within the operational footprint of the existing SSAA Eagle Park complex. The works are not visible from Gifkins Road or any identified public viewing corridor, and do not affect the open view path to the You Yangs. The range is sited below, and visually contained by, the natural escarpment that forms the southern edge of the site. The two shipping containers are single-storey and low-profile (2.6 metres high) and are finished in non-reflective earth-tone colours (Dulux Oyster Linen and Dulux Hog Bristle), consistent with the SLO1 decision guideline regarding non-reflective materials in colours complementary to the natural landscape.

The introduction of new ornamental or screen planting in the vicinity of the proposed range is not appropriate, for the following reasons:

- Dense screen planting would work against, rather than reinforce, the open and treeless landscape character that SLO1 seeks to protect.
- The site is an approved firing range. Range safety templates require a clear, unobstructed line of fire and rely on the natural escarpment as the projectile containment feature. New canopy or mid-storey planting within or adjacent to the range footprint would compromise the safety function of the range.
- The site is within the Bushfire Management Overlay and a Bushfire Prone Area. The Bushfire Emergency Management Plan (February 2026) relies on maintaining a low fuel load across the facility and identifies a bare-earth shelter-in-place location on the Main Range. Additional landscape planting in the operational area would be contrary to these fuel management measures.
- The proposal is surrounded by retained native vegetation (including Red Box Eucalyptus polyanthemos woodland and native grassland) across the broader Eagle Park site. The SLO1 landscape character is already achieved by the retained surrounding native vegetation, which will remain unaffected by the proposed works.

Clause 5.0 of SLO1 expressly identifies “the benefit of conditions requiring the landscaping of buildings and works, while also having regard to the maintenance of existing viewlines” as a decision guideline. Should Council consider that any landscaping is required, we would welcome this being resolved by way of a permit condition, limited to planting that is consistent with the open character and open view path objectives of SLO1, compatible with the range safety requirements of the facility, and compatible with the fuel management measures of the Bushfire Emergency Management Plan.



### Range Safety Signage

The signage associated with this Section 72 amendment is limited to internal wayfinding signage within the operational range area. No business identification signage, advertising signage, or promotional signage is proposed as part of this application. The signage will not be visible from Gifkins Road or any other public road, and serves only to direct range users to the correct firing positions and assembly/muster points for operational and safety purposes. To the extent that Clause 52.05 applies, the signage is considered to fall within the exemption at Clause 52.05-10(a) as a sign providing information, warning or direction about public safety at an approved shooting range facility. We would be content for any permit issued to include a condition limiting signage to internal wayfinding signage only, with any future business identification or advertising signage being the subject of a separate planning permit application.

## 4.3. Clause 44.06 Bushfire Management Overlay

### Purpose

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.
- To identify areas where the bushfire hazard warrants bushfire protection measures to be implemented.
- To ensure development is only permitted where the risk to life and property from bushfire can be reduced to an acceptable level.

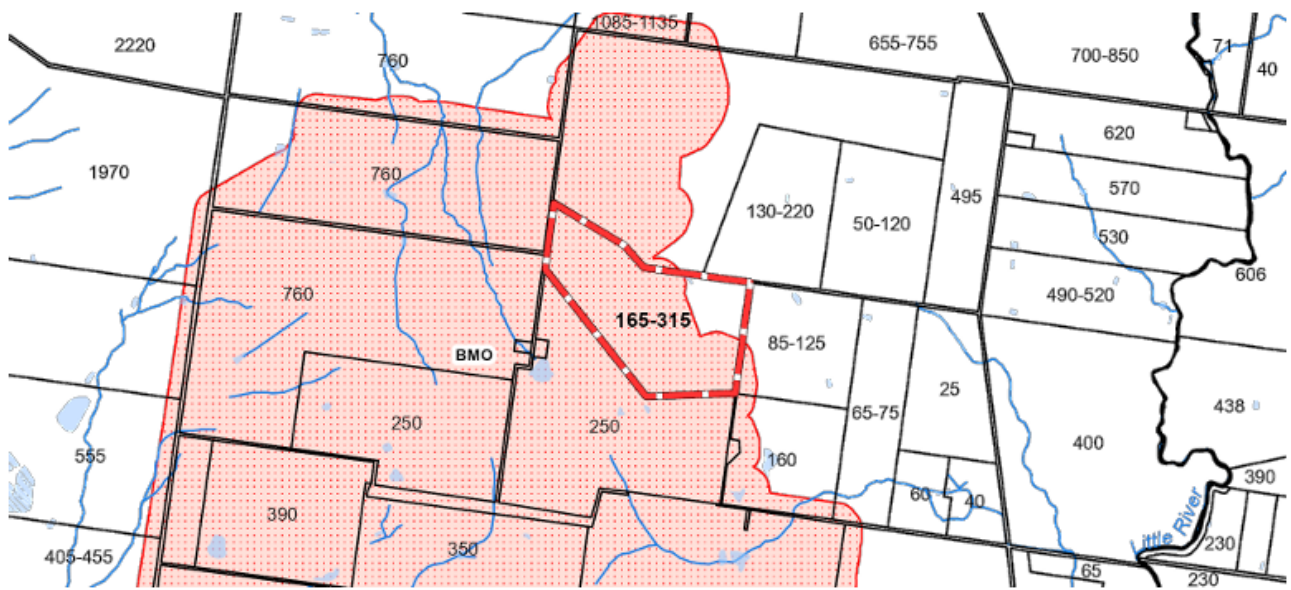


Figure 9: BMO Overlay map.

**Response:** The land is affected by the Bushfire Management Overlay (BMO) under the Greater Geelong Planning Scheme. The overlay identifies areas where the potential bushfire hazard requires additional consideration for siting, design, and access to ensure acceptable levels of risk to life and property.

A planning permit is required under Clause 44.06-2 to construct a building or carry out works associated with a leisure and recreation use. The amendment therefore triggers a permit under this provision, as it includes the installation of two shipping containers and associated works within the existing SSAA Eagle Park Shooting Complex.

The shipping containers will provide administrative, storage, and operational support functions for activities associated with the new range and controlled ballistic testing undertaken by Proxenus Services Pty Ltd. Both containers are modest in size, finished in non-reflective materials, and located within the existing cleared and



managed range area surrounded by earthen berms. Their siting within a gravelled and open area ensures adequate separation from vegetation and compliance with general defendable space principles.

The SSAA Eagle Park facility already operates under a bushfire-resilient layout with wide all-weather internal roads, managed grass cover, and substantial cleared zones that function as effective fuel breaks. The proposed buildings and works are contained entirely within this managed environment and will not increase site occupancy or bushfire exposure.

A Bushfire Emergency Management Plan (SSAA Victoria, Version 1, February 2026) has been prepared for the site and accompanies this application. The BEMP sets out site closure protocols for Catastrophic and Total Fire Ban days, pre-fire-season maintenance obligations, evacuation and shelter-in-place procedures, and fuel management measures across the facility. Fire Rescue Victoria and Council have indicated they are satisfied with the approach. The proposal maintains an acceptable level of safety consistent with Clause 44.06 and Clause 53.02 and does not increase the level of bushfire risk to life or property.

#### 4.4. Clause 12.01-2S (Native vegetation management)

##### Objective

- *To ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation.*

**Response:** The amendment seeks approval for the removal of native vegetation associated with the establishment of an additional range within a previously disturbed and partially cleared area of the SSAA Eagle Park Shooting Complex. The vegetation to be removed has been identified, quantified and assessed within the Ecological Assessment prepared by [REDACTED] (March 2026). The assessment quantifies the proposed removal as 0.371 hectares of patch vegetation (Habitat Zone 1A, EVC 72 Granitic Hills Woodland), of low condition (habitat score 0.44, with no large trees and high cover of introduced weeds including Boneseed, Phalaris, Galenia and Paterson's Curse).

The proposal has been designed to avoid and minimise vegetation removal wherever possible, consistent with the three-step approach outlined in the Guidelines for the Removal, Destruction or Lopping of Native Vegetation (DELWP, 2017). The range layout and associated works have been positioned within previously disturbed land, and only a small area of scattered native vegetation requires removal to accommodate the range footprint, safety berms, and vehicle access.

To offset the biodiversity impact of this limited removal, the Ecological Assessment (Appendix 3) identifies native vegetation credits available for purchase through the Native Vegetation Credit Register, providing the necessary credits to achieve the no-net-loss outcome required by policy.

The proposal therefore satisfies the objectives and strategies of Clause 12.01-2S by:

- Avoiding vegetation removal where practicable through the use of existing clearings and previously disturbed land.
- Minimising impacts to the extent necessary for safe site operation and access.
- Providing an appropriate offset in accordance with the Guidelines for the Removal, Destruction or Lopping of Native Vegetation (DELWP, 2017).

Overall, the proposal represents an acceptable and low-impact planning outcome that maintains the biodiversity values of the area while supporting the continued lawful use of the site for recreational and range activities.





## 4.5. Clause 13.02-1S (Bushfire planning)

### Objective

- *To strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life.*

**Response:** The land is affected by the Bushfire Management Overlay and is located within a designated bushfire-prone area. The site forms part of the established SSAA Eagle Park Shooting Complex, which operates under strict safety, access, and land-management arrangements, including wide gravel access roads, low-fuel cleared zones, and managed grass cover throughout the active range areas.

The amendment seeks approval for buildings and works associated with the establishment of an additional range within the existing cleared and managed portion of the complex. No change is proposed to the intensity, scale, or nature of the approved use. The new range and associated structures, including two small shipping containers for storage and administration, are located within an open, gravelled area surrounded by substantial setbacks from vegetation, consistent with defendable-space principles.

In accordance with Clause 13.02-1S, the proposal:

- Gives clear priority to the protection of human life by ensuring that all works occur within a controlled, low-fuel environment managed under SSAA Victoria's operational protocols.
- Avoids any increase in bushfire exposure, with all new structures sited within cleared areas maintaining adequate separation from vegetation and safe egress routes.
- Ensures that the development can continue to implement existing bushfire protection measures without additional vegetation clearance or biodiversity impact.
- Maintains safe vehicle access from Gifkins Road and through the internal road network, supporting emergency response access and site evacuation.

The SSAA Eagle Park facility has an established bushfire-resilient layout that already achieves the intent of the Bushfire Management Overlay through active fuel management and ongoing compliance with defendable-space requirements.

Given the contained nature of the proposal and its siting within a well-managed, low-fuel environment, the risk to life and property from bushfire remains acceptable. The amendment therefore satisfies the objectives and strategies of Clause 13.02-1S by maintaining a resilient and low-risk operating environment without intensifying development or population exposure in a bushfire-prone area.

## 4.6. Clause 14.01-1S (Protection of agricultural land)

### Objective

- *To protect the state's agricultural base by preserving productive farmland.*

**Response:** The subject land is zoned Farming Zone (FZ) but has long been developed and used as part of the SSAA Eagle Park Shooting Complex, an established and lawful recreational facility operating under existing permits. The site does not contain active agricultural uses, and the land's characteristics — including constructed range mounds, internal access roads, gravel surfaces, and cleared open areas — mean it is not currently used or suited for productive agriculture.



The amendment seeks approval for buildings and works associated with the establishment of an additional shooting range within the existing cleared portion of the complex. No change is proposed to the approved use of the land, and the development will remain entirely within an area previously modified for non-agricultural purposes. The proposal will not fragment or constrain adjoining rural land or diminish its ongoing agricultural potential.

The proposal is consistent with the objectives of Clause 14.01-1S, as it:

- Avoids the permanent removal of productive agricultural land from the state's agricultural base.
- Maintains the existing rural landscape character and open setting of the site.
- Does not introduce sensitive uses or dwellings that could conflict with agricultural activity in the surrounding area.
- Ensures that the established recreational use continues in a manner compatible with nearby farming and open space land.

The works are small in scale, reversible, and entirely contained within an area already developed for non-agricultural purposes. The amendment therefore does not compromise the availability or productive capacity of agricultural land in the region and is consistent with the purpose and strategies of Clause 14.01-1S.

## 4.7. Clause 15.01-6S (Design for rural areas)

Objective

- *To ensure development respects valued areas of rural character.*

**Response:** The land forms part of the SSAA Eagle Park Shooting Complex, located within a broad rural setting at the foothills of the You Yangs. The existing complex has an established recreational and training character, incorporating open range areas, berms, access tracks, and modest range structures that are visually recessive within the landscape.

The amendment provides for the establishment of an additional shooting range within an existing cleared and managed section of the site. The associated works include berm formation, range signage, a small gravel car park, and the installation of two shipping containers for storage and administrative purposes. The containers are of standard dimensions and will be finished in non-reflective, earth-toned colours consistent with the surrounding environment and existing structures.

The range has been designed and positioned to integrate with the established complex layout, maintaining the open visual character of the site. Existing berms, vegetation, and topography provide effective screening from external viewpoints, ensuring that the new range facilities are visually contained and sympathetic to the broader rural setting.

The proposal meets the objectives and strategies of Clause 15.01-6S by:

- Ensuring the new works are modest in scale, functional in design, and sympathetic to the rural landscape.
- Maintaining the open rural character of the area and protecting key views toward the You Yangs.
- Siting all structures within previously disturbed areas and avoiding intrusion into sensitive or prominent landscape features.

The design response is low-impact, visually unobtrusive, and fully consistent with the rural character objectives of the Farming Zone and the Significant Landscape Overlay (Schedule 1).



## 4.8. Clause 52.06 Car parking

### Purpose

- *To ensure that car parking is provided in accordance with the Municipal Planning Strategy and the Planning Policy Framework.*
- *To ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality.*
- *To support sustainable transport alternatives to the motor car.*
- *To promote the efficient use of car parking spaces through the consolidation of car parking facilities.*
- *To ensure that car parking does not adversely affect the amenity of the locality.*
- *To ensure that the design and location of car parking is of a high standard, creates a safe environment for users and enables easy and efficient use.*

**Response:** The proposed amendment seeks approval for buildings and works associated with the continued use of the SSAA Eagle Park Shooting Range. The amendment introduces a new crushed rock car parking area measuring approximately 30 metres by 12 metres, providing five delineated parking spaces together with associated turning, manoeuvring and service vehicle access areas required for safe operation adjacent to the range.

The site is accessed via the existing SSAA Eagle Park entrance from Gifkins Road and is supported by a well-established internal access network that connects to extensive parking facilities serving the wider complex. These existing facilities accommodate members, visitors, and staff during public operation days and are designed for a substantially higher parking demand than that generated by the proposed ancillary activity.

The Proxenus Services activity operates only when the SSAA Eagle Park range is closed to the public, ensuring there is no concurrent use of facilities or overlap in parking demand. SSAA public range operations occur Friday to Monday, while the Proxenus testing operations are scheduled for the remaining days (Tuesday to Thursday) under controlled supervision. This scheduling avoids cumulative impacts on vehicle circulation and ensures that the existing car parking capacity within the complex remains more than adequate.

The operation will typically involve up to ten personnel on-site at any one time, comprising testing staff, support personnel, and SSAA range officers. The activity will occur within the existing approved operational framework of Planning Permit PP-461-2020 and does not extend beyond the hours authorised for use of the land.

The additional car park ensures adequate provision for the limited staff and visitor demand associated with the use. When considered alongside the existing SSAA complex parking capacity, the site comfortably meets the intent of Clause 52.06. There will be no saturation or overflow of car parking demand, as the use operates independently of public shooting activities and within a confined area of the site already serviced by internal access roads and designated parking.

The proposal therefore complies with the objectives of Clause 52.06 by:

- Ensuring sufficient off-street car parking is available for staff and visitors.
- Locating the new parking area safely within the site and away from range operations.
- Maintaining safe and efficient access from Gifkins Road without any need for new crossovers.
- Avoiding any increase in traffic generation or pressure on existing on-site parking facilities.

The amendment represents a low-intensity, ancillary use that is well accommodated within the existing SSAA infrastructure. The overall parking provision is appropriate for the scale and frequency of activities proposed and consistent with the amenity and functional objectives of the overlay and zone controls applying to the site.



## 4.9. Clause 52.17 Native Vegetation

### Purpose

- *To ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation. This is achieved by applying the following three step approach in accordance with the Guidelines for the removal, destruction or lopping of native vegetation (Department of Environment, Land, Water and Planning, 2017) (the Guidelines):*
- *1. Avoid the removal, destruction or lopping of native vegetation.*
- *2. Minimise impacts from the removal, destruction or lopping of native vegetation that cannot be avoided.*
- *3. Provide an offset to compensate for the biodiversity impact if a permit is granted to remove, destroy or lop native vegetation.*
- *To manage the removal, destruction or lopping of native vegetation to minimise land and water degradation.*

**Response:** A planning permit is required under Clause 52.17 to remove, destroy, or lop native vegetation. The provision aims to ensure there is no net loss to biodiversity through application of the three-step approach outlined in DELWP's Guidelines for the Removal, Destruction or Lopping of Native Vegetation (2017).

The amendment involves limited native vegetation removal required to accommodate the establishment of an additional shooting range, associated accessway, and car parking area within the existing SSAA Eagle Park complex. The extent of removal has been minimised through careful siting and design, with all works positioned within previously disturbed and partially cleared areas of the site wherever practicable.

An Ecological Assessment prepared by [REDACTED] (March 2026) quantified the vegetation loss and confirmed that the removal of native vegetation triggers an offset requirement in accordance with Clause 52.17-5. The assessment identified a total offset requirement of 0.241 General Habitat Units (GHU) with a minimum Strategic Biodiversity Value of 0.7696.

The Ecological Assessment at Appendix 3 confirms the availability of suitable native vegetation credits through the Native Vegetation Credit Register. This offset arrangement will be secured in accordance with the requirements of Clause 52.17 and ensures that the biodiversity impacts associated with the proposal will be appropriately compensated in accordance with the Guidelines.

The proposal has therefore applied the required three-step approach as follows:

- **Avoid:** The range and access layout utilise existing disturbed and cleared areas to avoid removal of high-value vegetation.
- **Minimise:** The 0.371 ha of patch vegetation affected is confined to the minimum area necessary to accommodate the safety-critical range template and to utilise the natural escarpment as the projectile containment feature. The vegetation is of low condition (habitat score 0.44, no large trees, high weed cover) as detailed in the Ecological Assessment. The Avoid and Minimise Statement at Section 6.1 of the assessment demonstrates that no feasible alternative location exists within the Eagle Park complex that would deliver the required safety template without greater environmental impact.
- **Offset:** A compliant offset arrangement will be secured through the Native Vegetation Credit Register in accordance with the credits identified at Appendix 3 of the Ecological Assessment, achieving a no-net-loss biodiversity outcome.

Accordingly, the proposal satisfies the objectives and requirements of Clause 52.17 by ensuring that unavoidable vegetation loss is appropriately offset and that the biodiversity values of the area are maintained while allowing for the continued lawful and managed use of the site.

## 4.10. Clause 52.34 Bicycle facilities

### Purpose



- *To encourage cycling as a mode of transport.*
- *To provide secure, accessible and convenient bicycle parking spaces and associated shower and change facilities.*

**Response:** The amendment seeks approval for buildings and works associated with the establishment of an additional shooting range within the existing SSAA Eagle Park Shooting Complex. The proposal includes the formation of the new range area, berm construction, range management infrastructure, a small gravel car park, and the installation of two shipping containers for storage and administrative purposes.

The shipping containers are non-habitable structures used solely for equipment storage and operational support. They do not provide additional floor area accessible to staff or the public in a way that would generate demand for bicycle parking or end-of-trip facilities. The activity undertaken by Proxenus Services Pty Ltd is ancillary to the existing SSAA range operations and occurs on days when the public range is closed (Tuesday to Thursday), ensuring no overlap in attendance or site access demand.

Staff attendance is limited to approximately ten personnel on site during operational periods, with all access via vehicle. The site is located in a remote rural area with no existing or planned bicycle infrastructure and no practical means of access for cyclists. The established internal road and parking network adequately supports the operational requirements of both the existing and proposed activities.

Given that the amendment does not increase staff numbers or accessible floor area, and the proposed works are ancillary in nature, a waiver of the bicycle parking requirements under Clause 52.34-2 is appropriate. There is no realistic or practical demand for bicycle parking or related facilities at this rural location.

The proposal therefore satisfies the purpose and intent of Clause 52.34 by maintaining facilities appropriate to the scale, function, and rural context of the site, without necessitating the provision of additional bicycle infrastructure.

## 4.11. Clause 65 Decision guidelines

**Response:** The proposal has been assessed against the decision guidelines of Clause 65.01 and is considered appropriate for approval.

The amendment seeks approval for buildings and works and limited native vegetation removal associated with the establishment of an additional shooting range within the existing SSAA Eagle Park Shooting Complex. The activity undertaken by Proxenus Services Pty Ltd involves controlled ballistic testing to evaluate projectile performance and material response. It is ancillary in nature and occurs entirely under the management, accreditation, and governance of SSAA Victoria.

The proposal is consistent with the Municipal Planning Strategy, the Planning Policy Framework, and the purpose of the Farming Zone, which seeks to ensure that non-agricultural uses do not adversely affect agricultural land while supporting compatible rural-based recreation and employment activities. The range forms part of a long-established facility operating in a managed rural environment, well separated from sensitive land uses.

The works are modest in scale and include berm formation, range safety signage, the installation of two small shipping containers for secure storage and administration, delineation of a gravel car parking area, and limited native vegetation removal. All works are confined to previously disturbed and cleared areas and will not affect agricultural capability, landscape character, or the open rural views toward the You Yangs.

Environmental impacts have been quantified in the Ecological Assessment, which identifies 0.371 ha of patch vegetation (EVC 72 Granitic Hills Woodland) to be removed. The vegetation is of low condition (habitat score 0.44), contains no large trees, and has high cover of introduced weeds. The Avoid and Minimise Statement at Section 6.1 of the Ecological Assessment sets out the site selection rationale and demonstrates that no feasible alternative location exists within the Eagle Park complex that would deliver the safety-critical range template with lesser environmental impact. An approved offset will be secured through the Native Vegetation Credit Register to ensure compliance with Clause 52.17 and achieve a no-net-loss biodiversity outcome. The



works will be managed to ensure compliance with environmental protection and stormwater management requirements. The proposed shipping containers are not connected to any wastewater system. There is no septic, no sewer connection, and no wastewater-producing fixtures (such as toilets, sinks or showers) proposed within or connected to the containers. Toilet facilities for users of the range will be accessed via existing amenities elsewhere on the site. No new discharge points, wastewater generation, or erosion risks are introduced.

Traffic movements associated with the ballistic testing operations are limited and occur only on days when the range is closed to the public (Tuesday to Thursday). Existing access and parking arrangements within the SSAA complex adequately accommodate the anticipated level of use, ensuring there is no increase in off-site traffic or parking impacts.

The proposal represents an orderly and proper use and development of the land, enabling the continued safe and efficient operation of a well-established facility while maintaining the environmental, visual, and functional integrity of the surrounding rural landscape.

Accordingly, the proposal satisfies the decision guidelines of Clause 65.01 and represents an acceptable planning outcome consistent with the purpose of the zone, the overlay objectives, and the broader policy framework of the Greater Geelong Planning Scheme.



## 5. ASSESSMENT

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The following assessment considers the proposal against the relevant planning controls and policy objectives of the Greater Geelong Planning Scheme, with a particular focus on the Farming Zone (FZ), the Bushfire Management Overlay (BMO), the Significant Landscape Overlay – Schedule 1 (SLO1), Clause 52.17 (Native Vegetation), and applicable State and Local Planning Policies. The application seeks approval under Section 72 of the Planning and Environment Act 1987 for buildings and works and limited native vegetation removal associated with the established SSAA Eagle Park Shooting Complex at 165–315 Gifkins Road, Little River.

### Farming Zone (FZ)

The subject site is located within the Farming Zone, which seeks to ensure that non-agricultural uses do not adversely affect the use of land for agriculture while supporting appropriate rural-based and ancillary activities. The SSAA Eagle Park Shooting Complex is a long-established recreational and training facility operating within a managed rural environment.

The amendment does not introduce a new land use. The ballistic testing activities undertaken by Proxenus Services Pty Ltd are ancillary in nature, forming part of the existing range operations under the management and accreditation of SSAA Victoria. The works are modest in scale and include construction of an additional shooting range, associated berm formation, safety signage, and the installation of two shipping containers for secure storage and administration.

The proposal satisfies the purpose of the Farming Zone by maintaining an established rural-based recreational activity that coexists compatibly with surrounding agricultural and open space uses. The amendment promotes the safe and efficient ongoing use of the land without introducing new intensity or sensitive uses that could compromise agricultural potential or rural landscape character.

### Native Vegetation

The site contains areas of remnant native vegetation typical of the open woodland landscape of the Little River area. The amendment involves the removal of a small area of native vegetation to enable the construction of the additional range, associated accessway, and car parking area within the existing SSAA Eagle Park complex.

An Ecological Assessment prepared by [REDACTED] (March 2026) confirmed that a permit is required under Clause 52.17 to remove native vegetation. The removal is limited in scale and largely confined to previously disturbed areas, with the siting and design of the works informed by the three-step approach outlined in the Guidelines for the Removal, Destruction or Lopping of Native Vegetation (DELWP, 2017). These steps involve avoiding removal where possible, minimising impacts where avoidance is not practicable, and offsetting any residual biodiversity loss.

The assessment identified a total offset requirement of 0.241 General Habitat Units with a minimum Strategic Biodiversity Value of 0.7696. The necessary offsets will be secured through the approved process under Clause 52.17 once the amended permit is issued by Council. This ensures compliance with the Guidelines for the Removal, Destruction or Lopping of Native Vegetation (DELWP, 2017) and achieves a no-net-loss biodiversity outcome.

The vegetation removal has been justified on environmental and operational grounds and represents a balanced response that allows for the safe and compliant use of the range while maintaining the broader environmental values of the site.

### State and Local Planning Policy Compliance

The proposal aligns with the Municipal Planning Strategy and the Planning Policy Framework by supporting the ongoing use of rural land for compatible, low-impact recreational and ancillary commercial purposes. It responds to Clause 14.01-1S (Protection of Agricultural Land) by ensuring that the site remains available for long-term rural and recreational use, and to Clause 15.01-6S (Design for Rural Areas) by maintaining the open and visually unobtrusive rural character of the landscape.



The proposal also meets the objectives of Clause 12.01-2S (Native Vegetation Management) through avoidance, minimisation, and offsetting, and Clause 13.02-1S (Bushfire Planning) by ensuring that all works occur safely within a managed, low-fuel environment that does not increase bushfire risk.

#### Amenity and Interface Considerations

The proposed range is contained entirely within the existing complex and will not alter the established pattern of land use or built form. The facility will continue to operate under SSAA Victoria's existing management structure, which includes strict operational, safety, and environmental controls.

All ballistic testing will occur on non-public range days (Tuesday to Thursday) and within the designated safety template of the approved range. No overlap will occur with public range operations, ensuring there are no cumulative amenity, noise, or traffic impacts.

#### Traffic and Car Parking (Clause 52.06)

Vehicle movements will be limited to staff and authorised personnel associated with the testing program. A maximum of ten persons will be present on site at any one time, including SSAA representatives. Operations will occur between 8:00 am and 6:00 pm, Tuesday to Thursday.

The existing access and internal road network within the SSAA Eagle Park facility provides ample capacity for staff vehicles. A small gravel parking area with five marked spaces will be provided adjacent to the new range. As activities occur on non-public range days, there will be no overlap in demand or conflict in vehicle circulation.

#### Bicycle Facilities (Clause 52.34)

Given the rural context, the small number of staff, and the nature of the operations, cycling access is highly impractical. Bicycle facilities are therefore not required, and a waiver under Clause 52.34-2 is appropriate.

#### Environmental Management

The proposed works include berm construction, installation of range safety signage, and placement of shipping containers for secure equipment storage. The berms form a key part of the ballistic safety system at the SSAA Eagle Park facility, ensuring all projectiles are contained within the designated range area. Berm formation and reshaping will occur only within previously disturbed areas and will not alter drainage or surface conditions.

No new buildings, drainage infrastructure, or stormwater works are proposed. The limited vegetation removal required for safety and access purposes will be undertaken in accordance with the approved offset and ecological recommendations. The works maintain the environmental condition of the land and continue the long-established safety and management practices of the facility.

#### Existing Permit Conditions

The application does not seek to alter any of the existing conditions of Planning Permit PP-461-2020 (issued 12 October 2020). It is acknowledged, however, that certain existing conditions will require amendment, and additional conditions will be required, to accompany the buildings, works and native vegetation removal proposed under this Section 72 amendment.

The existing conditions identified as requiring amendment are Condition 1 and Condition 2 (Amended Plans and Endorsed Plans) to reference the revised plans prepared by [REDACTED] (Drawings 2025-001-A02 to A05, dated 16 April 2026), Condition 3 (no vegetation removal other than as marked on the endorsed plan) to reflect the updated vegetation removal shown on the revised plans and addressed in the Ecological Assessment ([REDACTED], March 2026), and Conditions 11 and 12 (Native Vegetation Offset Requirement and General Offset) to reflect the additional offset obligation of 0.241 General Habitat Units with a minimum Strategic Biodiversity Value of 0.7696.

Conditions 6 to 10 (Vegetation Protection), Conditions 13 to 15 (Offset evidence, timing and monitoring), Condition 16 (Fauna Protection), and Conditions 17 and 18 (Construction Environmental Management Plan) remain appropriate and will continue to apply to the works proposed under this amendment without further amendment. Conditions 19 and 20 (ESD) were drafted for the original training centre building and address habitable rooms, a rainwater tank connected to toilets, and double glazing. As the proposed shipping containers are non-habitable ancillary structures used for storage and administration, those specific ESD



measures are not physically applicable to the new works. We would be content for any appropriate ESD measures suited to the non-habitable nature of the containers to be imposed at Council's discretion.

Where new conditions are required to accompany the matters proposed under this amendment, these would include a condition limiting signage to internal wayfinding signage only (with any future business identification or advertising signage to be the subject of a separate planning permit application), and a condition requiring the Bushfire Emergency Management Plan (SSAA Victoria, Version 1, February 2026) to be endorsed as forming part of the permit.

For clarity, the operational characteristics of the new range (Tuesday to Thursday, 8:00 am to 6:00 pm, up to ten personnel on site) are described in this report and shown on the plans as contextual information supporting the amenity, traffic, car parking and bushfire assessments.

Subject to the above, any further conditions the Responsible Authority or referral authorities consider necessary can be imposed at Council's discretion.

### Overall Planning Considerations

The proposal represents an appropriate and low-impact amendment to an existing permit, enabling the continued safe operation of an established recreational facility. The works are compatible with the intent of the Farming Zone and relevant overlays and will not result in any material change to the site's environmental or visual character.

The amendment satisfies the objectives of the Greater Geelong Planning Scheme and represents a sound and proper planning outcome that should be supported accordingly.



## 6. CONCLUSION

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The proposal is considered appropriate for the following reasons:

- The proposal represents a modest and appropriate amendment to an existing planning permit, enabling the continued safe operation and managed evolution of a long-established recreational facility within a rural setting. It demonstrates a balanced response to environmental, operational, and policy considerations.
- The application seeks approval for buildings and works and limited native vegetation removal within the established SSAA Eagle Park Shooting Complex, which has been lawfully operating for many years. The proposed works are low-impact and support the continued safe, compliant, and efficient operation of the facility.
- The ballistic testing activities undertaken by Proxenus Services Pty Ltd are ancillary to the existing use of the land for a shooting range. The activity is conducted under the management, accreditation, and operational governance of SSAA Victoria, ensuring full compliance with range safety, environmental, and regulatory standards.
- The proposed works, including the establishment of an additional range, installation of range safety signage, placement of small storage and administrative containers, and berm formation, are confined to previously disturbed and managed areas. These works will not alter the site's environmental condition, landscape presentation, or the established rural character of the area.
- The limited vegetation removal required to facilitate the works has been justified and will be appropriately offset in accordance with Clause 52.17 and the Guidelines for the Removal, Destruction or Lopping of Native Vegetation (DELWP, 2017). The necessary biodiversity offsets will be secured through the approved process once the amended permit is issued by Council, ensuring compliance with the no-net-loss objectives of Clause 12.01-2S (Native Vegetation Management).
- The proposal satisfies the purpose and decision guidelines of the Farming Zone, the Bushfire Management Overlay, and the Significant Landscape Overlay – Schedule 1. It maintains the open, unobtrusive, and managed rural character of the locality while supporting the safe and ongoing operation of an established recreational use.
- The activity operates on non-public range days (Tuesday to Thursday) with limited staff attendance and no public interface. The existing SSAA facility provides adequate access, car parking, and safety management capacity, ensuring there are no adverse off-site impacts on amenity, traffic, or environmental quality.

In view of the above, the proposal achieves an acceptable and balanced planning outcome consistent with the objectives and policies of the Greater Geelong Planning Scheme. Council's support is therefore sought for the Section 72 amendment to Planning Permit PP-461-2020 to allow buildings and works and limited native vegetation removal associated with the continued and compliant operation of the SSAA Eagle Park Shooting Complex.

