

Our Ref: Nome South

1 April 2024

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Dear Jake

**RE: MCU23/0138 - telecommunications facility
9 Serene Court, NOME QLD 4816**

As Council is aware, **SAQ Consulting Pty Ltd** acts on behalf of Waveconn Operations in respect of this application. Waveconn is a licenced carrier for the purposes of the *Telecommunications Act 1997 (Cth)* and operates as an infrastructure provider or 'neutral host', whereby new facilities are sited, designed, acquired, built and maintained by Waveconn but utilised by mobile carriers as part of their respective networks.

The proposal by Waveconn is to establish a telecommunications facility, in the form of a mobile telephone base station at 9 Serene Court, NOME. The proposed facility will be located at the rear of the property and accessed off Kalka Parade.

The proposed facility will allow for significantly improved access to telecommunications to Nome and Julago (including the new development area) and the Bruce Highway. The subject land is located within the *Rural residential zone* pursuant to the Townsville City Plan and is an impact-assessable form of development pursuant to table 5.5.5.

I am in receipt of Council's Information Request (IR) dated 30 January 2024 and pleased to provide this planning statement to address the IR.

Need for the Facility

Waveconn is proposing the facility to cater for a projected future need by the carriers in this area as part of a larger strategic program across Queensland. As such, the proposal represents strategic and practical forward planning based on projected future need - an approach which, for this type of infrastructure, has generally not occurred in the past.

However, it is critical to note that as Waveconn is an infrastructure owner and provider it will not build the structure until a carrier elects to locate on it – that is, the structure will not be speculatively built in the hope it will be collocated on. As such, there will be no impact – visual or otherwise - from the structure until there is a need for it to be constructed. To that end, Council and the community do not need to be concerned that unnecessary structures will be constructed, regardless of whether there is an approval in place but in this instance

Waveconn is confident there will be a demand in the short term for the proposed structure and seeks an approval on that basis. It is noted that there is already a substantial rural residential area established and a developing housing area in the 'Emerging Community Zone', which is at a much higher density. As such, demand for improved service in this area is not only immediate but will continue to grow over time as the urban zone continues to develop.

Once the structure is in place with the first carrier, it will also be suitable and available for collocation by a second (and potentially third) carrier. This preference and preparation for collocation will also help to minimise the number of such structures in the area.

In terms of future requirements, the coverage in the area is generally poor with the nearest existing telecommunications facility located about 2.4 kilometres to the north-west at Sunnyside Street. This is a shared facility between Telstra and Optus. The next nearest facility is 4.65 kilometres to the east, further along the Bruce Highway.

As such, it is not possible to service the area from existing facilities as they are simply too far away, particularly as the population and demand grows. Data services in the area will already be unreliable and throughput speeds slow, with this also set to worsen.

Figure 1 below shows an extract from www.rfnsa.com.au which is essentially a database of all existing (and proposed) facilities in Australia. As indicated on the extract the proposed facility (marked with an orange square) is sited well away from existing facilities and close to the urban and rural residential areas of Nome.

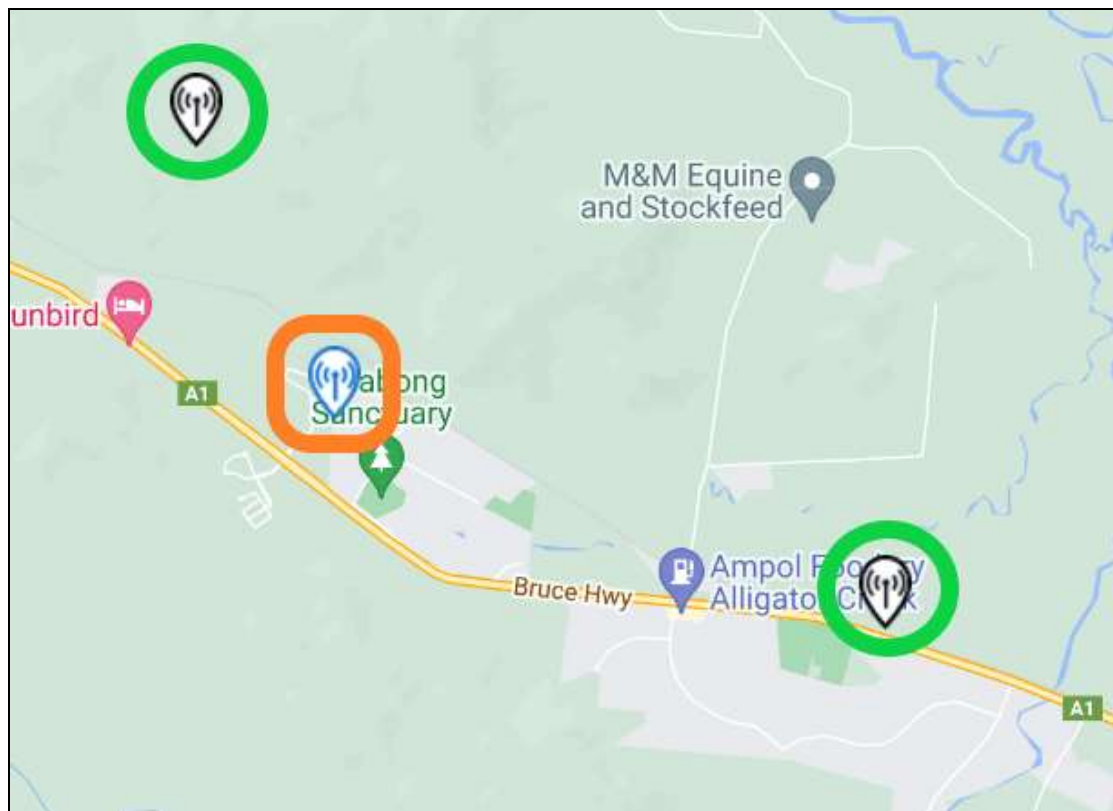


Figure 1: Proposed Location (orange square) with existing facilities shown (green circles)



As noted above, the proposed Waveconn facility is well placed to allow for new and significantly improved coverage and services to Nome and Julago, the rural surrounds and the Bruce Highway and North Coast railway.

Given the total lack of existing telecommunications infrastructure and other tall structures in the area, collocation is not an option for addressing future requirements and a new structure will be required.

In selecting a suitable location for a new facility, Waveconn has had regard to the 'precautionary principle' as set out in Appendix A of the Industry Code C564:2020 for mobile phone base station deployment.

The Proposal

The proposal is to establish a new telecommunications facility in the form of a monopole, and equipment shelter on the subject land.

The details of the proposed facility are shown on the attached proposal plans, but more specifically the proposal is comprised of the following elements:

- a 30-metre tall monopole located in a 10m x 10m compound (100sqm total) near the south-western corner of the property, about 30 metres back from the Kalka Parade frontage;
- a new headframe mounted at the top of the monopole to accommodate up to nine panel antennas;
- new equipment cabinets (one 4-bay and one 6-bay) connected to the monopole by an overhead cable tray; and
- security fencing with double gates for access.

There will also be a need for ancillary equipment associated with the antennas such as remote radio units (RRUs), tower mount amplifiers (TMAs) and various cables. These pieces of ancillary equipment will generally be mounted within the proposed headframe or behind proposed antennas and will not materially alter the appearance or increase the bulk of the installation.

All cables connecting the antennas to the various cable trays will be internal to the monopole, except where they exit the monopole to connect to the relevant antennas. The monopole does not have any provision to allow it to be climbed and specifically has the capacity to accommodate collocation.

The area required for the facility, its compound and access are within a relatively clear area and any vegetation clearance required will be minimised to the extent possible. Access to the facility will be from Kalka Parade.

The proposed facility will comply with Australian Government regulations in relation to emission of electromagnetic energy (EME) - specifically being Australian Standard Radiation Protection Series S-1 Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to

300 GHz published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in 2021.

Subject Land

The subject land is a large rural residential allotment located at the end of Serene Court and backing on to Kalka Parade. The subject land is a ‘hammerhead’ allotment, with an access handle from the Serene Court cul-de-sac to the main part of the land where there is a dwelling, outbuildings and a mix of cleared and vegetated areas. The land is formally described as lot 66 on RP748776 and is about 2.84 hectares in size. The subject land and the location of the proposed facility are shown in Figure 2 below.



Figure 2: Subject land and proposed facility location (red dot)

The Locality

The locality, shown in Figure 3 below, has the following key features:

- Established rural residential area, generally of Coast Road, and includes the subject land. This area is heavily vegetated and dwellings are scattered;
- Developing residential area (suburb of Julago and within the *Emerging Community Zone*), generally west of Coast Road and both sides of the Bruce Highway. The density of dwellings is suburban in nature and there is little vegetation in this newer area;
- The Bruce Highway;
- North Coast Railway corridor; and
- The rural hinterland, including Special Purpose zoning

The nearest dwellings to the proposed location are approximately 60 metres to the north-west and are within the more recent residential development. As noted above, there are no existing telecommunications facilities in the locality.



Figure 3: Locality and proposed facility location (red dot)

Assessment against the Townsville City Plan

As noted above, the subject land and proposal is located in the *Rural residential zone* pursuant to the Townsville City Plan. In this zone, a telecommunications facility is an impact-assessable form of development.

The location is also subject to two overlays, which are summarised and briefly assessed as their applicability in the table below:

Overlay	Location Affected?	Comment
Bushfire hazard (medium)	Yes	See comments below
Development constraints – flood hazard	No	Not applicable

As well as the zone code and overlays, an assessment against the following codes is also required:

- Telecommunications facilities and utilities code
- Healthy waters code
- Landscape code
- Transport impact, access and parking code
- Works code

All of the relevant provisions are discussed below.



Strategic Framework

The Strategic intent of the City Plan is strongly focussed on Townsville's size and key importance as the major economic and service centre for the region – the northern/second capital of Queensland. There is a major focus on growth more generally and whilst Nome is not specifically mentioned the development of the community at Julago features prominently and is intended to be an important part of Townsville's future growth.

As such, access to essential services for this area is strongly desired by the Strategic Framework to ensure a '*strong and connected community*' and as set out above, network coverage in this area is poor. Julago will also boast '*ample local services and jobs*', which are both difficult to achieve without sufficient levels of essential services, including telecommunications.

Connectivity is also an essential requirement for tourism as well as other economic outcomes such as running small businesses and working from home and meeting the communications needs of the community more generally, including traffic on the Bruce Highway. These themes are broadly touched on in 3.3.6 – Integrated infrastructure planning and provision, although telecommunications are not specifically mentioned.

As such, the proposed facility is generally aligned with the Strategic framework within the City Plan.

Rural Residential Zone Provisions

The purposes set down for the *Rural Residential Zone* are as follows:

1. *The purpose of the Rural residential zone code is to provide for residential development on large lots where the intensity of residential development is dispersed.*
2. *The particular purpose of the code is to:*
 - a) *provide for semi-rural lifestyles in which the primary use is dwelling houses on large lots which may have limited access to infrastructure and services;*
 - b) *provide for some subordinate, and generally domestic scale, rural activities and home based business to occur;*
 - c) *ensure development maintains the character and amenity of the rural residential locality; and*
 - d) *ensure any intensification of impacts on nearby ecological values or natural resources is avoided.*
3. *The purpose of the zone will be achieved through the following overall outcomes:*
 - a) *residential development occurs in the form of dwelling houses, to the general exclusion of other more intensive residential uses;*
 - b) *reconfiguration creates large lots which support a semi-rural lifestyle and avoid intensification of impacts on on-site and on nearby ecological values, natural resources or rural activities;*
 - c) *lot sizes are sufficient to ensure the protection of environmental values and water quality objectives;*
 - d) *further expansion of existing rural residential areas does not occur beyond those areas zoned for this purpose;*

- e) *home businesses occur to an extent that does not unduly diminish the semi-rural residential amenity, having regard to noise, odour, dust, traffic and other impacts;*
- f) *roadside stalls and other sales of produce produced on the site are of a limited scale that is consistent with the semi-rural lifestyle;*
- g) *non-residential uses occur within the zone where they primarily support the day-to-day needs of the immediate residential community and do not unreasonably detract from the residential amenity of the area;*
- h) *development is buffered from nearby rural land such that the productive use of the rural land is not constrained;*
- i) *residential development is protected from the impacts of nearby industrial activities, transport corridors and infrastructure installations and major facilities such as Department of Defence landholdings;*
- j) *the natural bushland setting and village character of Balgal Beach and the Magnetic Island townships are maintained. Tourism accommodation in these communities is of a house compatible scale; and*
- k) *development does not diminish water quality and does not intensify impacts on other environmental values including remaining areas of ecological significance within the zone.*

With respect to the above provisions, the following comments are made:

- Residential development within the rural residential zone is already well established and cannot be affected by the subject proposal. The lots are large, there is significant amounts of vegetation and the proposed facility occupies only 100 sqm.
- The proposal does not adversely impact on semi-rural lifestyles (although there will be improvements to essential services), does not impact on the continuing use of the subject land or adjoining land, has virtually no impact on the character and amenity of the rural residential locality due to its siting, physical separation from other uses in the zone and existing screening from vegetation and there are no impacts on ecological or natural resource values.
- The proposed facility is not for a residential use, does not require the reconfiguration of a lot, supports home businesses and the day-to-day communication needs of the community, does not interfere with rural uses and there is no impact on quality of water or environmental values generally.

For these reasons, the proposed facility is consistent with the purposes and desired outcomes as set out in the zone code and can comfortably be sited within the *Rural residential zone*.

With respect to Table 6.2.4.3 (Assessable development), the following comments are made against the relevant provisions:

- PO1** - The proposed facility will be 30 metres tall, which is a necessary requirement to ensure a suitable coverage area can be achieved and obstructions (such as trees) do not unduly interfere with the service provided. The proposed facility's location is set well away from residential uses within the zone and screened by vegetation from residential uses to the west. As such, the impact on amenity has been appropriately minimised in this instance.



- PO2** - Once constructed and operational, there will be no parking of heavy vehicles on the site and maintenance visits are generally infrequent (perhaps 2-4 times a year).
- PO3** - not applicable.
- PO4** - not applicable.
- PO5** - not applicable.
- PO6** - not applicable.
- PO7** - Although a new element, the proposed facility occupies a very small part of the subject land, zone and locality and is well screened by vegetation in all directions. It is also a type of infrastructure commonly seen in rural areas and is, in any event, needed to improve telecommunications access in the area. The impacts on local character and amenity are minimal.

The proposed facility is of the minimum height required for operational purposes and will provide the day-to-day telecommunications needs of the local community (both existing and future), as well as allow for collocation to minimise the amount of such infrastructure in the locality.

The proposed facility is located in the *Rural Residential Zone*, with the *Emerging Community Zone* the only other zone available (noting the *Rural Zone* parcels are too far away or not readily accessible). As such, the selected zoning is the most appropriate in this instance.

- PO8** - not applicable.
- PO9** - as noted above, the proposed facility requires sufficient height to ensure proper and efficient operation, needing to be clear of trees and able to 'see' as much of the primary coverage area as possible. As such, height restrictions clearly aimed at more 'traditional' building forms are not appropriate and given the low overall bulk of the proposed facility, the proposed height is considered acceptable.
- PO10** - The proposed facility's impacts, particularly in this location well away from dwellings and sensitive land uses, are as follows:
- it will not generate any noise issues (only noise is from air-conditioning for the cabinets)
 - its 24/7 operation is necessary and has no adverse impact arising
 - once constructed, the facility will be visited infrequently (4-6 times a year) and therefore generate minimal traffic
 - as set out above, its visual impact has been minimised by its location and the screening provided by the existing vegetation
 - no odours are generated and electromagnetic emissions are well within the public safety limit
 - there is no lighting associated with the facility
 - there are privacy issues arising



- the location of the facility does not materially impact the outlook from any other land

PO11 - the proposed facility (nor the subject land) is not located on a major road and is set well inside the property, with screening from vegetation already in place. As such, no landscaping is proposed as it would have no practical effect.

PO12 - the proposed facility is more than 400 metres from the nearest rural uses and will have no adverse impact on them.

PO13 - the proposed use is not a sensitive land use.

PO14 - the proposed facility requires minimal earthworks (the excavation of the monopole footing will be the key requirement), will not interfere with drainage patterns or drainage capacity, does not require any substantial removal of vegetation, is not located near a waterway and generates minimal runoff.

Accordingly, it is considered the proposed facility sits comfortably within the zone and its location has minimised its impact on the surrounding area.

Overlays

With respect to the applicable overlays, the following comments are made:

Bushfire hazard (medium)

The proposed facility does not increase the severity of bushfire hazard nor the risk to life, property, community or the environment. It operates unmanned, does not increase the risk of bushfire occurring and provides essential communications during times of emergency or natural disaster.

As such, the proposal is compatible with the bushfire hazard for the area and serves an important role in emergency management (which includes battery backup for times when mains power is cut).

In terms of the performance outcomes:

- Safety of people and property is not compromised
- The development is not a type that is highly vulnerable
- The development is sited in a cleared compound and can operate during power outages
- Water supply is available on the subject and in the nearby residential area
- There is no storage of hazardous materials
- No new lot is created
- The location is readily accessible from Kalka Parade and Serene Court

Flood Hazard

Location is not affected and therefore this overlay is not relevant.



Other Relevant Codes

As noted above the relevant table of assessment identifies five codes applicable to the assessment of the proposal, as set out below.

9.2.1 - Telecommunications facilities and utilities code

The purpose of the Telecommunications facilities and utilities code is set out at 9.2.1.2, which states:

1. *The purpose of the Telecommunications facilities and utilities code is to ensure that facilities are located, designed and managed to be compatible with the locality in which they are established.*
2. *The purpose of the code will be achieved through the following overall outcomes:*
 - a) *development avoids or minimises adverse impacts on the natural environment;*
 - b) *development does not unreasonably impact on the character and amenity of the locality;*
 - c) *risks to public health and safety are minimised and contained to acceptable levels; and*
 - d) *development facilitates co-location of infrastructure wherever possible.*

With respect to these provisions, the following comments are made:

- the siting of the proposed facility away from the Kalka Parade boundary, well away from any dwelling in the *Rural Residential Zone* and the extensive screening provided by vegetation throughout the locality will ensure the facility has minimised its impacts on the character and amenity of the area;
- the proposal minimises its impacts on the natural environment by occupying only a small area that is relatively clear of vegetation;
- the proposed location, appearance and operation of the proposed facility does not unreasonably impact on the character and amenity of the locality as it is located well away from dwellings and sensitive land uses and can be further minimised by the appropriate painting/finishing of the structure;
- there are no risks to public health and safety arising from the proposed facility, which will be securely fenced and operate at all times within the mandated EME safety limits; and
- the proposed facility will specifically allow for collocation of future and additional infrastructure to occur.

As such, the proposal is highly consistent with the purpose of the code.

Turning to the relevant performance outcomes set out in table 9.2.1.3:

PO1 - not applicable.

PO2 - for the reasons set out the proposed facility is setback from the road boundary and screened extensively by vegetation. It is well separated from all the dwellings within the *Rural Residential Zone* and approximately 50 metres from all residential



allotments in the adjacent zone (*Emerging Community*, which it is noted is not a residential zone category).

- PO3** - a telecommunications facility such as the type proposed must have sufficient height for the antennas in order to work efficiently and minimise the number of additional facilities required. The proposed facility's location is set away from existing dwellings, other sensitive land uses and roads and is screened substantially by existing vegetation. As such, there is no material detracting from the scenic amenity and character of the locality.
- PO4** - the proposed facility is comprised of a steel monopole (which can be painted to minimise its glare and reflectivity, with 'Pale Eucalyptus' or similar finish suggested) and prefabricated equipment cabinets. Given the location selected none of the ground-based components will be visually prominent.
- PO5** - not applicable.
- PO6** - not applicable.
- PO7** - as set out above, the proposed facility has been sited such that the nearest residential use is approximately 60 metres away (to the north-west) and as a result the amenity and continued use and enjoyment of the residential area is not unduly compromised.
- PO8** - The development is set back from the Kalka Parade (Coastal Road) boundary by about 40 metres. There will not be any unreasonable impacts on adjoining land as a result of noise, glare, overshadowing, loss of privacy or visual obtrusiveness.
- PO9** - No landscaping is proposed in this instance and given the location of the facility would have little impact on the public realm.
- PO10** - apart from the noise of air-conditioners attached to the shelter (which are typical domestic-style units), the proposed facility makes no noise. Given it is well away from the nearest sensitive receiver, it can easily comply with the requirements of AO10.
- PO11** - the proposed facility will comply with the relevant EME standard – a mandatory requirement. The current applicable standard is *Radiation Protection Series – S1 (Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz)* or RPS S-1, thereby complying with AO11 (noting that the standards set out in the AO are outdated).
- PO12** - the proposed facility's compound will be securely fenced along all boundaries and complies with AO12.
- PO13** - the proposed facility and its compound will have the normal regulatory warning signs as required. There will be a single entry point to the compound and safe vehicle access will be constructed as part of the proposal.
- PO14** - the location selected is relatively clear of vegetation and minimises its overall impact on the natural environment. Once constructed and operational, the facility's impact will be limited to that of visual impact and infrequent maintenance visits.



POs 15-17 relate to electricity infrastructure and are not applicable to the proposal.

As such, it is considered the proposed facility demonstrates a high level of consistency with the Telecommunications facilities and utilities code and has been sited and designed to minimise its impact, particularly on sensitive land uses.

9.3.2 Healthy waters code

With respect to the Healthy waters code provisions:

- the proposed facility has little surface area and will not contribute in any material way to stormwater runoff, flow or natural hydrological processes; and
- no waste is generated by the proposed facility.

Accordingly, the proposed facility will have negligible impacts on the quantity or quality of water on the subject land and is consistent with the desired outcomes of the Healthy waters code.

9.3.3 Landscape code

As noted above, no landscaping is proposed in this instance.

9.3.5 Transport impact, access and parking code

With respect to the Transport impact, access and parking code provisions:

- All vehicles associated with the construction of the facility can be accommodated on the subject land;
- There is sufficient space for parking of maintenance vehicles (which normally consist of a SUV or similar), with such visits to the facility infrequent;
- Access to the land will be from Kalka Parade and can readily be established, with no parking impacts on that roadway; and
- There are no adverse impacts on traffic flow or parking on Kalka Parade nor on the safety of the corridor and no unreasonable impacts on sensitive land uses.

As such, the proposed facility, its location and access are consistent with the outcomes of the Transport impact, access and parking code.

9.3.6 Works code

With respect to the Works code provisions:

- The proposed infrastructure will significantly improve access to telecommunications within the Nome/Julago area, Bruce Highway and surrounds, to improve the reliability and availability of such services;
- The proposed facility will comply with relevant EME standards and is located in a secure compound;
- The proposed facility has no need for a water supply or wastewater connection and electricity and optic fibre can be brought to the location;
- The proposed facility is sited in an area mostly clear of vegetation with only minor impacts expected in this respect. There will not be any impact on the quality of water;
- The proposed facility has been set back from the road boundary, residential uses and main traffic thoroughfares to minimise impacts on character and amenity;



- The proposed facility will facilitate the efficient provision of infrastructure, with the monopole suitable for collocation by others;
- The proposed facility will be constructed and operated at no financial cost to the community;
- Access and parking provisions will be fit for purpose and commensurate with the on-going requirements of the facility;
- Excavation, primarily for the purposes of constructing the monopole footing, will be managed on the subject land to ensure no environmental harm is caused; and
- Waste and construction management plans will be prepared prior to the commencement of construction.

As such, the proposed facility is consistent with the outcomes of the Works code.



Conclusion

The proposal by Waveconn is to construct a new telecommunications facility in the form of a 30m-tall monopole and equipment cabinets at the rear of 9 Serene Court, Nome.

There are no existing telecommunications facilities within 2.4 kilometres of the selected location, which is adjacent the growing Julago development area. As such, there is a requirement for additional infrastructure to both meet existing and future demand and supply reliable telecommunications services, primarily to the nearby rural residential areas of Nome, the residential areas of Julago as well as the Bruce Highway, rail corridor and rural surrounds.

Access from Kalka Parade will be established to access the facility and there is adequate space on the land for parking and there will be no impact on public road movement systems or safety. The location selected is mostly clear of vegetation and only minimal additional clearance is anticipated, which is unlikely to have any noticeable impact on amenity or the appearance of the subject land.

The proposal demonstrates a high level of consistency with the relevant City Plan provisions, including those contained with the *Rural residential zone* code and the Telecommunications facilities and utilities code.

I consider the subject proposal sufficiently accords with the strategic and practical intent of both the City Plan and the realities of the subject land and surrounds. In particular, the proposed facility will meet the general expectation of the City Plan that such infrastructure will be provided to meet the communication needs of the community whilst minimising any significant or adverse impacts. The proposed facility is also consistent with and supports the infrastructure and economic outcomes sought by the Scheme's Strategic Framework, particularly given the importance of the Julago area.

Accordingly, the application warrants a planning permit. Should Council require any additional information prior to making its determination, please do not hesitate to contact the undersigned.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Baade', is positioned above the printed name.

MARK BAADE

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