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Sharna Pou  
Planning Officer  
Logan City Council  
PO Box 3226  
Logan City DC QLD 4114



**SAQ Consulting Pty Ltd**

ABN 76 864 757 592

P O Box 50

Clayfield QLD 4011

Dear Sharna

**RE: MCUI/23/2024 – Material Change of Use - telecommunications facility  
Springwood Shopping Mall, 34 Fitzgerald Avenue, SPRINGWOOD QLD 4127**

As Council is aware, **SAQ Consulting** acts on behalf of **Waveconn Operations Pty Ltd** ('Waveconn') 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 the Springwood Shopping Mall, 34 Fitzgerald Avenue, SPRINGWOOD.

The proposed facility will allow for significantly improved access to telecommunications in the surrounding commercial/retail area, to the Pacific Motorway and to parts of Springwood, Slacks Creek, Underwood and Rochedale South. In particular, it will improve in-building coverage to the east of the proposed location, where such infrastructure is lacking, and allow much greater access to 5G services.

The subject land is located within the *Centre zone* pursuant to the Logan Planning Scheme and is an impact-assessable form of development.

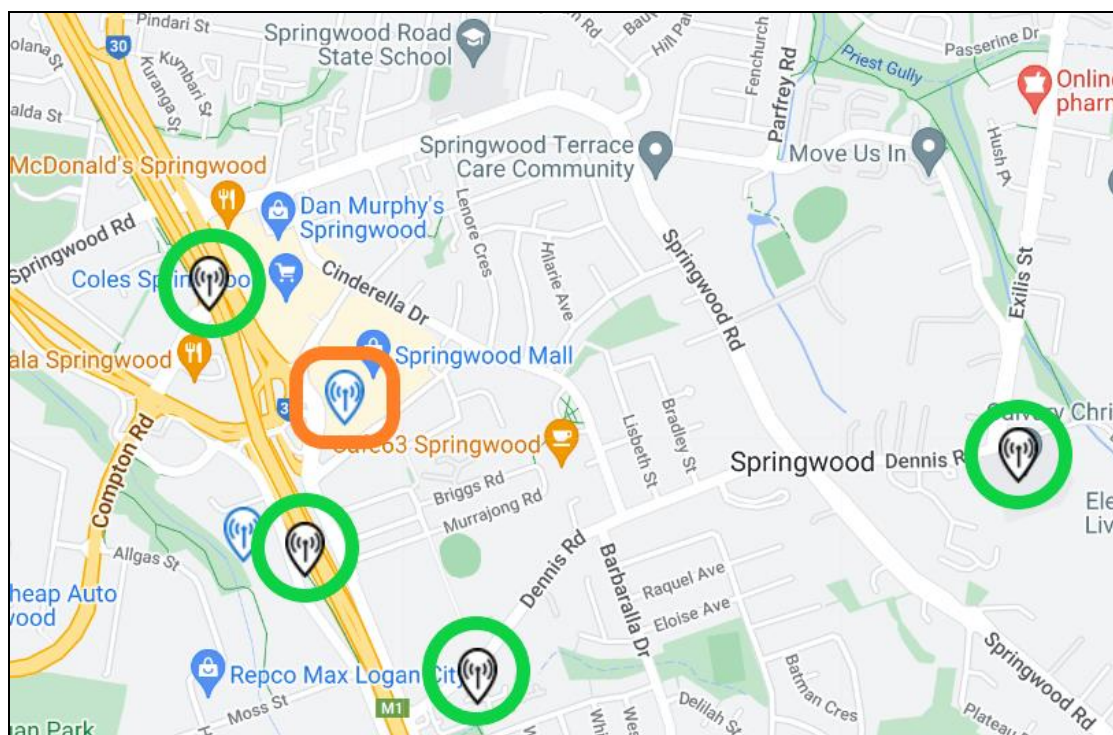
This letter constitutes a detailed planning statement as to the merits of the proposal to assist Council with its determination of the application.

### **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's south-east. 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.

Figure 1 below shows an extract from [www.rfnsa.com.au](http://www.rfnsa.com.au) which is essentially a database of all existing (and proposed) facilities in Australia. The proposed facility is marked with an orange square and all nearby existing facilities are shown in the green circles.



*Figure 1: Proposed and existing facilities at Springwood and surrounds*

The nearest existing facilities are on the western side of the motorway, which is a very busy arterial road in this area and by itself presenting significant demands on the mobile networks in the area. It is noteworthy that the only existing facility to the east is an ‘in-building antenna system’ at 129 Dennis Road and therefore not a tower servicing the area around it.

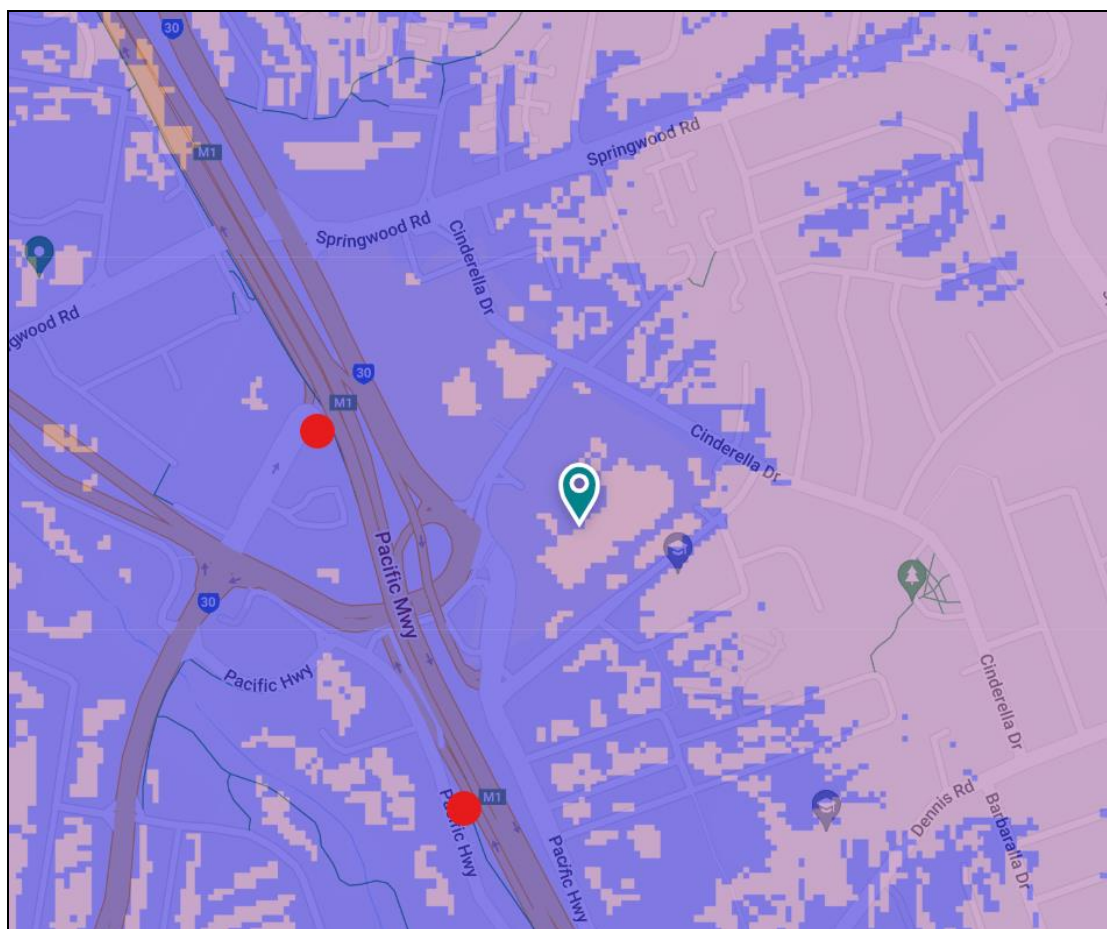
The nearest facility is a Telstra 20m-tall monopole at 3359 Pacific Highway, Slacks Creek, which due to its height has limited collocation opportunity and is too far south and west to provide the desired improvements to the shopping area, commercial uses and suburban uses further east.

The next nearest facility is a 25m-tall monopole shared by Optus (at 25m) and Vodafone (at 19m) and located on Lexington Road, Underwood. Due the amount of existing equipment and heights available (which are further complicated by its very close proximity to new motorway infrastructure), there is no additional collocation capacity at this location, which is similarly too far north from the shopping/commercial area to be of use.

In any event, the improvements sought on the eastern side of the motorway could not be achieved by each of the carriers collocating on the structure they are not already on.

Further, as there are no other similar facilities to the east of the shopping area, coverage in this area is generally poor and access to 5G services very limited.

Figure 2 shows the existing Optus 5G coverage in the area (sourced from [www.optus.com.au/coverage](http://www.optus.com.au/coverage)) and demonstrates the limited reach of 5G into this area, which has both coverage and capacity implications – capacity being the ability of the network to service customers simultaneously, with the most noticeable impact that of reliable data access and speeds.



**Figure 2:** Existing Optus 5G coverage in the area (subject location marked)

As such, there is not only no opportunities for collocation to solve the issue identified and to that end a new structure is required. Once the proposed structure is in place, it will also be suitable and available for collocation by up to 3 carriers.

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 ground-mounted equipment cabinets in a fenced compound on the subject land.

The details of the proposed facility are shown on the plans lodged with the application but more particularly, the proposal consists of the following key elements:

- a 30-metre tall monopole located near the south-western corner of the property, at the rear of the carpark off the Rochedale Road frontage. Due to the constraints of the carpark, the proposed compound is an irregular shape and is approximately 83 sqm in size. Up to three existing carparks will be needed to accommodate the facility;
- a new headframe mounted at the top of the monopole to accommodate up to nine panel antennas;
- a new 6-bay equipment cabinet (dimensions 2.32m H x 0.75m D x 4.27m L) and 4-bay equipment cabinet (dimensions 2.33m x 2.87m x 0.75m) located at the base of the monopole and connected by way of an overhead cable tray; and
- timber paling fencing (visually permeable) with gates.

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 headframes or behind proposed antennas and will not materially alter the appearance or increase the bulk of the installation.

All cables connecting the antennas 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 but does have the capacity to accommodate collocation.

The area required for the facility and its compound is generally clear of vegetation and the removal of only one tree is required, including to access the location. The location will be accessed via the existing access and carpark off Rochedale Road.

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 an irregularly-shaped allotment of some 5.6 hectares located on the eastern side of Rochedale Road and the Pacific Motorway at Springwood, with a second frontage to Fitzgerald Avenue and a small rear frontage to Tina Avenue. The land's formal description is lot 1 on RP 193124.

The land is located within the *Centre zone* and within the Springwood local plan area, within which it is designated as 'Centre Core'. The land is shown in Figure 3 below.

The land accommodates a large shopping mall along most of the rear boundary with carparking towards Fitzgerald Avenue. A separate building, used as a restaurant, and a small, separate carpark are located in the southern corner of the land and effectively operate independently to the rest of the centre. It is in this area the proposed facility will be located and as such it will have no material impact on the operation of either the main shopping centre building or the adjacent restaurant.



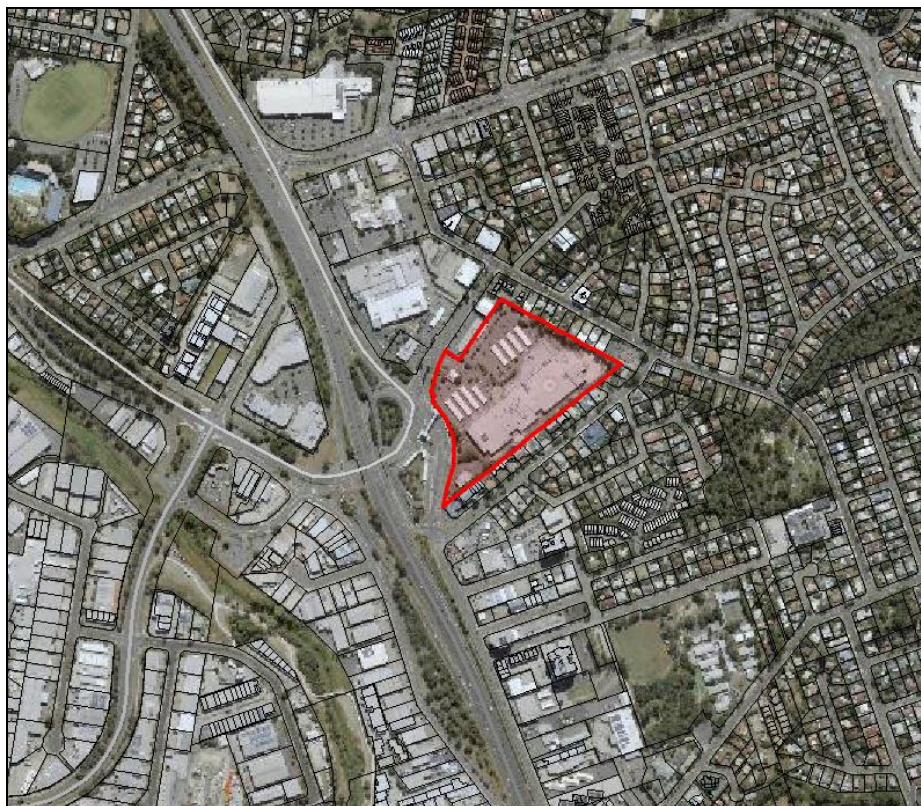
*Figure 3: Subject Land and proposed facility location*

The proposed facility will be located predominantly in a garden bed area and a small section of the existing carpark, with the monopole approximately 60 metres back from Rochedale Road (to which the subject land has a frontage) and 50 metres from Vanessa Boulevard (to which the subject land does not have a frontage and is separated by the properties on the northern side of that street).

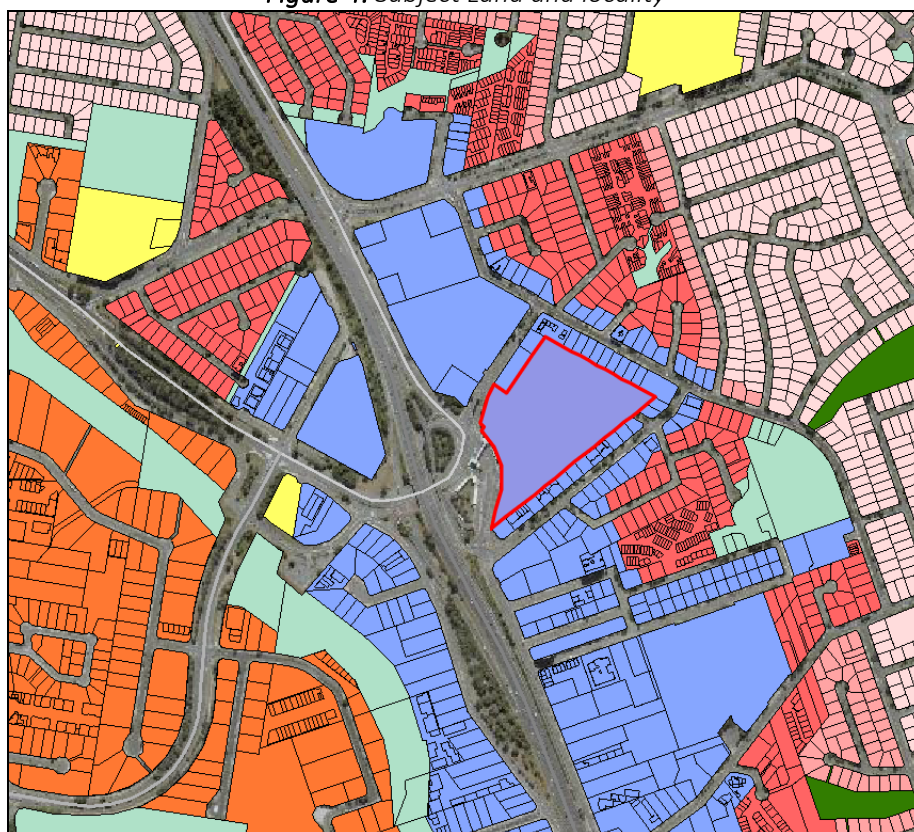
### **The Locality**

The locality around the subject land is mixed, with a large commercial area along both sides of the Pacific Motorway (particularly on the eastern side, amongst which the subject land is located) with residential uses and open space surrounding the commercial uses, as shown in Figure 4. The Pacific Motorway is the main thoroughfare along with its associated interchange ramps and other infrastructure make it a particularly dominant feature in this area and contributing to the high activity nature of the locality.

The zoning generally reflects the existing land uses, as shown in Figure 5, although there are some residential uses within the *Centre zone*.



*Figure 4: Subject Land and locality*



*Figure 5: Subject Land and Zoning*



As noted above, there are two existing telecommunication facilities within the locality but both have limited collocation capacity which would not, in any event, solve the issue identified with in-building coverage in the centre zone and coverage and network capacity in the suburban areas to the east in particular.

The subject proposal is sited in an appropriate zone and sufficiently set back and screened from roadways, dwellings and more sensitive land uses. There is no obviously better zone in which the facility could be placed and still meet the network objectives sought.

### **Assessment against the Planning Scheme**

As noted above, the subject land and proposal is located in the *Centre zone* pursuant to the City of Logan Planning Scheme and within the Springwood local plan area. The centre is designated as the highest order 'principal' centre and is one of only two in the City of Logan.

Pursuant to the Tables of Assessment, a telecommunications facility is not specifically mentioned in table 5.5.1.1 and is therefore an impact-assessable form of development by default.

The subject land is also affected by a number of overlays, most of which are not applicable to the selected location, which is free of flood risk in particular, but close to the edge of the landslide overlay. There are no issues arising with respect to airport or noise overlays.

As well as the zone, local plan and overlay codes, there are relevant development codes for consideration, the most relevant of which are:

- 9.3.7 Telecommunications facility code
- 9.4.2 Filling and Excavation code
- 9.4.3 Infrastructure code
- 9.4.4 Landscape code
- 9.4.7 Servicing, access and Parking code

All of the above matters are discussed in detail below.

### Strategic Framework

The Planning Scheme's Strategic Framework does not specifically reference telecommunications in its infrastructure section, but as the proposed facility is an essential type of infrastructure it is given it will be required and therefore necessary to read down the Strategic Framework in such a way.

The following comments are also made with respect to the Strategic Framework:

- The Strategic Framework seeks to have efficient, cost-effective, functional and sustainable infrastructure networks, which are provided and integrated with development, which in this area is a large commercial area (a designated principal centre) and key transport route with residential uses surrounding. Not only is this area an appropriate area in which to place such infrastructure, the diverse types of land uses existing and envisaged to occur in this principal centre will rely on access to essential services, such as high-quality telecommunication services;



- In this instance, the proposed facility will provide improved telecommunications services to the principal centre and underserved suburban area to the east; and
- The proposal is consistent with the strategic outcomes for infrastructure set out at 3.13.1.

Accordingly, the proposed facility is generally aligned with the intent of the Strategic Framework provisions.

#### Centre Zone Code

The purpose of the Centre zone code is set out at 6.2.1.2 and states:

1. *The purpose of the Centre zone is to provide for a variety of uses and activities to service all or part of the local government area, including, for example, administrative, business, community, cultural, entertainment, professional, residential or retail uses or activities.*
2. *The local government purpose of the Centre zone code is to:*
  - a. *protect the centre hierarchy;*
  - b. *provide a vibrant mix and intensity of uses;*
  - c. *provide a built form that provides visual interest and a sense of place while being compatible with the surrounding area;*
  - d. *provide development that is compatible with adjoining uses and protects amenity.*
3. *The purpose of the Centre zone code will be achieved through the following overall outcomes:*
  - a. *development protects the Centre hierarchy being:*
    - i. *principal centres as the dominant centres;*
    - ii. *major centres that complement and are subordinate to the principal centres;*
    - iii. *district centres that complement and are subordinate to major and principal centres;*
    - iv. *local centres that complement and are subordinate to district, major and principal centres;*
    - v. *neighbourhood centres that complement and are subordinate to local, district, major and principal centres.*
  - b. *development ensures that positive social and health impacts are enhanced and negative impacts are mitigated or avoided;*
  - c. *development in a principal centre:*
    - i. *provides a diverse mix of Principal centre activities;*
    - ii. *has the highest concentration and intensity of centre activities in Logan*



As per the Editor's note within the text, the subject land is located in the Springwood principal centre and is therefore subject to the Springwood local plan.

In terms of zone's stated purpose, the proposed facility:

- is a type of land use that could be entirely expected in a centre zone, particularly in the highest-order centre zone such as the case here;
- is a type of land use that provides essential infrastructure (especially 5G), reliable access to which is critical for the types of land uses within the centre zone and necessary for the surrounding suburban area;
- has not impact on the centre hierarchy;
- occupies only a very small area and has no impact on them mix and intensity of uses within the zone; and
- is sited away from the main activity of the shopping centre on the subject land, away from public roads and dwellings and is therefore is compatible with the surrounding area insofar as such infrastructure can be (as opposed to it being located on a road frontage, residential zone or allotment boundary or otherwise prominently on the site) and also appropriately protecting amenity, particularly of adjoining uses.

In terms of the relevant assessment benchmarks contained in Table 6.2.1.3.1:

PO1 - it is noted that none of the centre zones in the hierarchy list telecommunications facilities in the 'defined activity group' lists, but it is obvious that no policy intent can be drawn from that given the generally suitable nature of centre zones and that essential infrastructure must be provided to these high-activity areas for their proper functioning. Further, an analysis of the types of land uses envisaged in the principal centre makes it entirely clear that a telecommunications facility is a compatible use and would have much less impact than some of the uses listed. As such, despite not appearing in the use list, the principal centre is an appropriate location for the proposed facility.

PO2 – PO4 – not applicable

PO5 - the proposed facility does not adjoin a residential zone or allotment and the only noise from the facility will be from air-conditioning associated with the cabinets, which does not run constantly, and their noise levels meet the required standards.

The facility does not produce any air emissions, is not lit and does not vibrate.

The radiation emissions referred to in the planning scheme do not relate to non-ionizing radiation (they relate to radiation emitted by radioactive decay of a substance), such as that used by the facility. In any event, as stated above, the proposed facility will and must comply with the relevant public safety standard for electromagnetic emissions, which is RPS S-1 and administered by ARPANSA.

PO6 - the proposed facility is not a sensitive land use.

PO7 - not applicable.

PO8 - the proposed facility is not a sensitive land use.



PO9/10 – the proposed facility’s location is suitably setback and meeting AO9 and AO10.

PO11-PO13 – not applicable.

PO14 – this PO is clearly targeted at ‘traditional’ styles of buildings and not infrastructure. In any even the proposed facility is well set back from the primary road frontage and away from the main activity area of the shopping centre as well as residential land uses in the locality.

PO15 - not applicable.

PO16 - not applicable.

PO17 - the visually permeable nature of the fenced compound will allow for casual surveillance, does not create any confusion for pedestrians and limits the opportunity for graffiti and vandalism.

PO18 - the setback of the proposed facility from Rochedale Road and all surrounding roads as well as its position on the subject land will ensure there is minimal, if any, impact on any streetscape.

PO19 - no new servicing areas or parking or proposed.

PO20 - not applicable.

PO21-22 – not applicable.

Based on the above assessment, the proposed facility is a suitable type of land use within the zone and its siting on the subject land will ensure its impacts are suitably minimised.

#### Springwood Local Plan Code

The subject land is located in the Springwood Local Plan area. The subject land is located in the CC- Centre core precinct, which covers a large area of the north-eastern part of the precinct on the eastern side of the Pacific Motorway and between Springwood Avenue and Vanessa Boulevard.

As with the zone code section above, a telecommunications facility is not a specifically listed land use within the local plan area or any of the precincts. However, in my view, there is no policy inference to be drawn from this as clearly essential infrastructure to properly service this important economic, employment and activity area – which is of the highest order within the City of Logan – will be required. Instead, it is a question of not whether the proposed facility is appropriate but whether it has been sited and designed to minimise both its impact on the locality and its impact on the functioning of the subject land and desired outcomes set down in the local plan.

The purpose of the Springwood local plan code is set out at 7.2.10.3, with those relevant to the subject land set out as follows and discussed further below:

1. *The purpose of the Springwood local plan code is to:*

- a. *develop the local plan area as a dominant principal centre within the Logan urban area, serving its primary trade area;*
  - b. *establish the highest concentration and intensity of Centre activities in Logan, equal only to the other principal centre at Beenleigh;*
  - c. *develop and enhance the local plan area as Logan's pre-eminent commercial centre;*
  - d. *establish a highly urbanised built form, character and level of amenity that reflects a mix of high intensity uses including quality high rise buildings;*
  - e. *establish transit oriented development with intensive retail, commercial and residential uses in a walkable catchment of the Springwood transit hub;*
  - f. *create a fine grain movement network that gives priority to walking, cycling and public transport over private vehicles;*
  - g. *enhance and develop the identity and distinctive character of the Springwood local plan area and its precincts.*
2. *The Springwood local plan comprises five precincts identified on the Springwood local plan map LPM-10.00 in Schedule 2 - Mapping and Figure 7.2.10.4.1 - Springwood local plan precincts being the:*
- a. *Centre core precinct;*
3. *The purpose of the code will be achieved through the following overall outcomes:]*
- a. *The local plan area is a mixed use residential and employment area supporting a range of Principal centre activities;*
  - b. *A town square on Murrabung Road provides a vibrant focus for the community;*
  - c. *Small-scale ground floor tenancies adjoining the town square or active frontage streets enable multiple uses, animate the streets and enhance engagement;*
  - d. *Public transport, cycling and walking are given priority over motor vehicles by:*
    - i. *streetscape improvements and new pedestrian connections that create legible, safe, comfortable and interesting routes;*
    - ii. *pedestrian permeability:*
      - A. *along existing road network and new roads;*
      - B. *through lots connecting Rochedale Road to Carol Avenue, Fitzgerald Avenue and Cinderella Drive;*
      - C. *between Fitzgerald Avenue, through the existing Shopping Centre to Springwood Road;*
      - D. *in access laneways through the Commercial precinct;*
      - E. *to and through Springwood Park, Slacks Creek and Park on Dennis Road;*
    - iii. *wide footpaths and dedicated pedestrian networks along roads;*
    - iv. *establishing the new access laneways as shared zones;*
    - v. *cycle networks along the roads connecting to the SEQ principal cycle network and to the major cycle network along Logan Road and Vanessa Boulevard and to cycle networks outside the local plan area;*
    - vi. *vehicle access to premises adjoining the town square not detracting from the pedestrian and shopping environment of the town square;*
    - vii. *concealing car parking on private land from the town square and active frontage streets;*
    - viii. *the transit hub being integrated with adjacent development;*

- e. *Built form facilitates a safe and interesting public realm by:
 
  - i. *stimulating activity at ground level on active frontage streets;*
  - ii. *assisting in wayfinding;*
  - iii. *enabling positive casual surveillance and engagement in and around the town square and long active frontage streets;*
  - iv. *enabling casual surveillance of Slacks Creek Park corridor, Springwood Park and the Park on Dennis Road;*
  - v. *defining and supporting a human scale on active frontage streets;*
  - vi. *integrating seamlessly pedestrian areas within development sites with the streetscape;**
- f. *Built form facilitates wayfinding and provides a sense of place by defining key destinations and streets, including the town square, transit hub, civic and community buildings and active frontage streets;*
- g. *Built form adjoining or with frontage the town square and active frontage streets creates a visually attractive streetscape by presenting a range of building materials, distinctive entrances and quality street furniture and landscape treatments;*
- h. *Built form adjoining the Slacks Creek park corridor, Springwood Park or the Park on Dennis Road is visually attractive and establishes a positive interface with the Parks;*
- i. *Building heights:
 
  - i. *create interest along active frontage streets with the tallest and most prominent buildings sited at key intersections and around the town square and transit hub;*
  - ii. *where a landmark building and exceeding the building height identified on Figure 7.2.10.4.3 - Springwood building heights, the landmark building demonstrates design excellence, enhanced identity and wayfinding and acts as a visual marker;*
  - iii. *are the greatest in the Centre core precinct and avoid unacceptable impacts on adjacent residential development by transitioning down in height towards residential zone category land, while responding to the topography of individual sites;**
- j. *The visual presentation of the local plan area from the Pacific Highway is of a high quality with articulated building forms, minimal blank facades, varied building materials and colour or texture, screened rooftop plant and a landscape setting;*
- k. *In the Centre core precinct land uses are Principal centre activities other than Adult store or an Adult store in a Shopping centre;*

With respect to the local plan code desired outcomes set out above:

- The proposed facility is without doubt a type of land use that must occur in both the local plan area (and in particular the precinct in which the subject land is located) in order for adequate essential services infrastructure to support the land uses envisaged (both type and intensity) in this pre-eminent commercial centre;

- None of the outcomes sought in (3) are compromised in any way by the subject proposal as the proposed facility is well set back from road frontages, is well below the maximum building height and does not interfere with pedestrian network, cycle networks or access through the subject land; and
- The view from the Pacific Highway in the context of a range of existing built form and, once painted, a narrow, transitory element likely to go unnoticed by motorists.

The Springwood local area code is accompanied by a series of maps, against which the proposal has been assessed and the following comments are made:

Figure No.	Figure Title	Comments
7.2.10.4.1	Precincts	Located in the Centre core precinct
7.2.10.4.2	Place making and movement	Not relevant as the proposed facility is well inside the property boundary and does not interfere with any of the desired outcomes of this figure
7.2.10.4.3	Building heights	Maximum building height is mapped as 90m, which, at 30m, the proposed facility is well below
7.2.10.4.4	Streetscape (overall)	The only relevant map to the subject land is 7.2.10.4.8
7.2.10.4.8	Streetscape – Fitzgerald Ave West	The proposed facility is more than 6 metres from Fitzgerald Avenue and therefore complies with the building height and streetscape outcomes shown on this figure

In terms of the relevant assessment benchmarks contained in Table 7.2.10.4.1:

PO1 – not applicable.

PO2 – the proposed facility has a maximum height of 30 metres, which is well below the maximum building height set out in Figure 7.2.10.4.3 of 90 metres; therefore AO2 is achieved.

PO3 – the proposed facility exceeds all desired boundary clearances.

POs 4-7 – not applicable.

PO8 – the monopole is behind the existing building line and more than 60 metres from Rochedale Road.

POs 9-14 – not applicable.

PO15 – as discussed above, although the proposed facility, which is an essential service, is not a land use specifically listed as a ‘principal centre activity’, it is obviously a type of land use required in the zone and precinct to allow for the proper functioning of the range and intensity of desired land uses in the area. Accordingly, it is an acceptable type of land use with an assessment required of its appropriateness in terms of design and siting, which in this instance is acceptable.

POs 16-17 – not applicable.

POs 18-28 – not applicable.



PO11 - not applicable.

Based on the assessment against the Springwood local plan code set out above, the proposed facility is generally consistent, is a type of land use most certainly required (and should be reasonably assumed) and, importantly, does not interfere with any of the desired outcomes for the plan or relevant precinct area.

#### Overlays

There are a number of overlays listed as affecting the subject land as set out below.

Overlay	Location Affected?	Comment
Local and state environmental significance polygons	No	Not applicable
Flood Risk (several categories)	No	Not applicable
High flow area	No	Not applicable
Landslide =>15%	Yes	No excavation is proposed of the existing landform is proposed, with the facility placed on level ground. As such, no measures are required with respect to landslide.
Strategic Airport	Yes	Given the proposed facility is only one-third of the maximum building height allowable, there is unlikely to be any aircraft or airport safety issues arising. The land use is not one that attracts birds or bats.
Transport Noise Corridor	Yes	The proposed facility is not a land use sensitive to transport noise.

#### Development Codes

There are a number of development codes applicable to the subject land and proposal, which are set out and discussed below.

##### *9.3.7 Telecommunications Facility Code*

The proposal is subject to the Planning Scheme's Telecommunications facility code, the purpose of which states:

- (1) *The purpose of the code is to protect the amenity of the surrounding area.*
- (2) *The purpose of the code will be achieved through the following overall outcomes:*
  - a. *A Telecommunications facility:*
    - i. *Is integrated with the natural and built environment;*
    - ii. *Supports collocation;*
    - iii. *Minimises adverse amenity impacts on development in a residential zone category.*

With respect to the proposed facility:

- Impacts on the amenity of the surrounding area has been minimised through the siting of the facility on the subject land, which places is well away from the main activity of the shopping centre building, does not interfere with the separate



restaurant building, has been set back from all road frontages and is well separated and/or screened from residential land uses;

- To further integrate it into its surrounds, the monopole can also be treated/painted to ensure it is non-reflective and minimises any residual impact;
- The proposed facility supports collocation; and
- As set out above, the impact on the nearest residential area (noting it is set well away from most residential areas) has been minimised through its separation of more than 80 metres with intervening non-residential buildings and changes in levels.

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

With respect to the Performance outcomes:

PO1 – the proposed facility has, for the reasons set out above, minimised its impact to an appropriate extent within the *Centre* zone. It is also located on a lot wholly inside the *Centre zone* and does not adjoin any lots within a residential zone category, with the nearest residentially-zoned lot about 140 metres to the east on Laurinda Crescent. The proposed facility is well separated, including by other non-residential buildings, from the nearest residential area.

PO2 – as noted above, the proposed facility has been sited and designed to integrate with the built environment in which it is located and uses the subject land and other land within the *Centre zone* to adequately minimise its impacts on residential uses. It is well set back from Rochedale Road and in an overall sense is unlikely to be perceived as visually obtrusive. It is well below the maximum building height set out for the applicable local plan precinct.

PO3 – as set out above there are no suitable collocation opportunities in this instance but the proposed facility provides for future collocation of telecommunications facilities and therefore complies with AO3 and this performance outcome.

PO4 – a security fence will surround the proposed facility's compound, which will effectively exclude fauna.

Accordingly, the proposed facility is highly consistent with the purpose, desired outcomes and intent set down by the Telecommunications facility code.

#### *9.4.2 Filling and excavation code*

The construction of the proposed facility will necessarily involve excavation in order to construct the footing for the monopole and, to a lesser extent, the foundations for the cabinets. Once constructed, it is not anticipated that any retaining will be required.

With reference to the filling and excavation code:



- Excavation necessary for the proposed facility will form part of a Construction and Environment Management Plan (CEMP) to ensure excavated materials are appropriately managed and there is no discharge of sediments etc.
- Excavated material will not be stored on the subject land.
- The footing for the monopole is constructed of concrete and only minimal fill will be required in the area.
- The CEMP will ensure no existing infrastructure is affected by the construction or is appropriately relocated where necessary.

As such, the proposed facility can readily be constructed (with the appropriate construction management plan/s) in accordance with the Filling and excavation code.

#### 9.4.3 Infrastructure Code

The proposal is subject to the Planning Scheme's Infrastructure Code.

The purpose of the Infrastructure Code (as relevant to the proposed development) is stated as:

1. *The purpose of the code is to ensure that infrastructure is provided to service development.*
2. *The purpose of the code will be achieved through the following overall outcomes:*
  - a. *development protects the existing infrastructure and planned infrastructure networks...(includes telecommunications)*
  - b. *development other than operational work provides infrastructure that is necessary to service the development, including elements of:*
    - i. *safe and efficient other networks including electricity, gas and telecommunications;*
  - c. *development integrates with existing and planned infrastructure networks;*
  - d. *infrastructure is designed and constructed to deliver a standard of service that is efficient and equitable;*
  - e. *the cost to the community for the life of the infrastructure is minimised by providing for a suitable design life, ease of maintenance and ease of replacement;*
  - f. *infrastructure protects personal health and safety and premises;*
  - g. *infrastructure protects environmental values.*

With respect to the purposes of the code, the following comments are made:

- The proposed facility is a type of land use required in this pre-eminent commercial area to ensure adequate levels of service are provided within the precinct and the residential areas adjoining;
- The proposed facility will have no adverse impact on existing or planned infrastructure networks;
- The proposed facility will provide telecommunications to the surrounding area and in particular improve existing coverage and expand 5G availability to the area, particularly to the east;
- The proposed facility has been sited and designed to serve as large an area as practical, which ensures an efficient and equitable provision of service that minimises the need for additional infrastructure;



- There is no financial cost to the community as the infrastructure will be owned, operated and maintained by a private company;
- The infrastructure is designed to ensure the protection of health and safety to both persons and the premises; and
- The proposed facility will be located in an existing carpark area with only minimal disturbance to existing landscape vegetation.

With respect to the Performance outcomes:

PO1 – the proposed facility requires only connection to electricity and optical fibre, both of which are already available on the subject land.

PO2 – the proposed facility will result in the necessary infrastructure to provide telecommunications services to the surrounding area.

PO3 – the proposed facility will have no impact existing or planned infrastructure networks.

PO4/PO5 – the proposed facility will have no impact on fire-fighting provisions on the subject land.

PO6 – not applicable.

PO7 – the monopole and equipment cabinets have minimal surface area to generate runoff and it is anticipated the surrounding land can cope with any such runoff.

PO8 – the proposed facility's location will have no impact on the natural flow of surface water.

PO9 – not applicable.

PO10/PO11/PO12 – not applicable.

Accordingly, it is considered the proposed facility adequately meets the intent and requirements of the Infrastructure code.

#### *9.4.4 Landscape Code*

The proposed facility is well set back from road frontages and is within a carpark area. No additional landscaping is proposed or considered practical in this instance, with appropriate fencing likely the most effective way to screen the base of the facility. In this case, a timber paling fence is proposed (as opposed to the standard chain-mesh security fence) which will provide an adequate treatment for this location.

#### *9.4.7 Servicing, Access and Parking Code*

The proposed facility, once constructed, will be visited infrequently – perhaps four to six times per year and usually by a single person in a vehicle, such as a ute or SUV. As such, a dedicated car-parking space is not reasonably required, with such a vehicle easily able to be accommodated on the subject land.

The existing driveway and crossover from Rochedale Road and carpark circulation areas will be utilised and as such no new potential conflict points or safety issues arise.



Accordingly, given the circumstances it is not considered the proposal needs to provide any specific components to comply with the Servicing, access and parking code as all requirements can easily be accommodated within the subject land.

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## Conclusion

The proposal by Waveconn is to construct a new telecommunications facility in the form of a 30m-tall monopole and ground-based equipment in the existing carpark at 34 Fitzgerald Avenue, Springwood.

The proposed facility will significantly improve the level of service to this large commercial area and residents in the nearby residential areas, particularly to the east. The proposed facility is specifically designed to facilitate collocation.

The siting on the subject land is set well back from road frontages and behind the existing building line. The location has minimal impact on the carparking provisions on this part of the land and only a small amount of landscaping will need to be removed.

The overlays applicable to the subject land are either not relevant to the location selected or are not materially impacted by the proposal.

For the reasons set out above, the proposed facility shows a high level of consistency with both the Centre zone code and the Springwood local plan code. There is also a high level of compliance with the Telecommunications facility code and the proposal does not affect or materially undermine any other applicable overlay or development code.

The subject proposal is designed and sited to deliver an improved telecommunication service to the surrounding area while minimising its impact through design and siting to the extent it can, which in this instance is to a more than adequate level.

As such, having regard for all the relevant issues I am of the view the proposed facility demonstrates sufficient merit and should be granted 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 be 'Mark Baade', written over a faint circular stamp.

### **MARK BAADE**

Planning Consultant

B. Plan (Hons)

M: 0417 088 000

[mark@saqconsulting.com.au](mailto:mark@saqconsulting.com.au)