Moreton Bay Regional Council

SUPPORTING INFORMATION

for respective items considered at

Coordination Committee Meeting

11 June 2019

SUPPORTING INFORMATION
Ref: A18577044, A18577042, A18577039, A18577040, A18577043, A18577123 & A18577122

The following list of supporting information is provided for:

ITEM 2.1 & ITEM 2.1 (CONT'D)
DA/37146/2018/V2U - MATERIAL CHANGE OF USE - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11

#1 Locality Plan

#2 Zoning Map

#3 Plans for Approval

#4 Documents for Approval

#5 Plan to be Amended - Landscaping Plan

#6 State Development, Manufacturing, Infrastructure & Planning Response with conditions

#7 Properly Made Submissions

#8 Not Properly Made Submissions

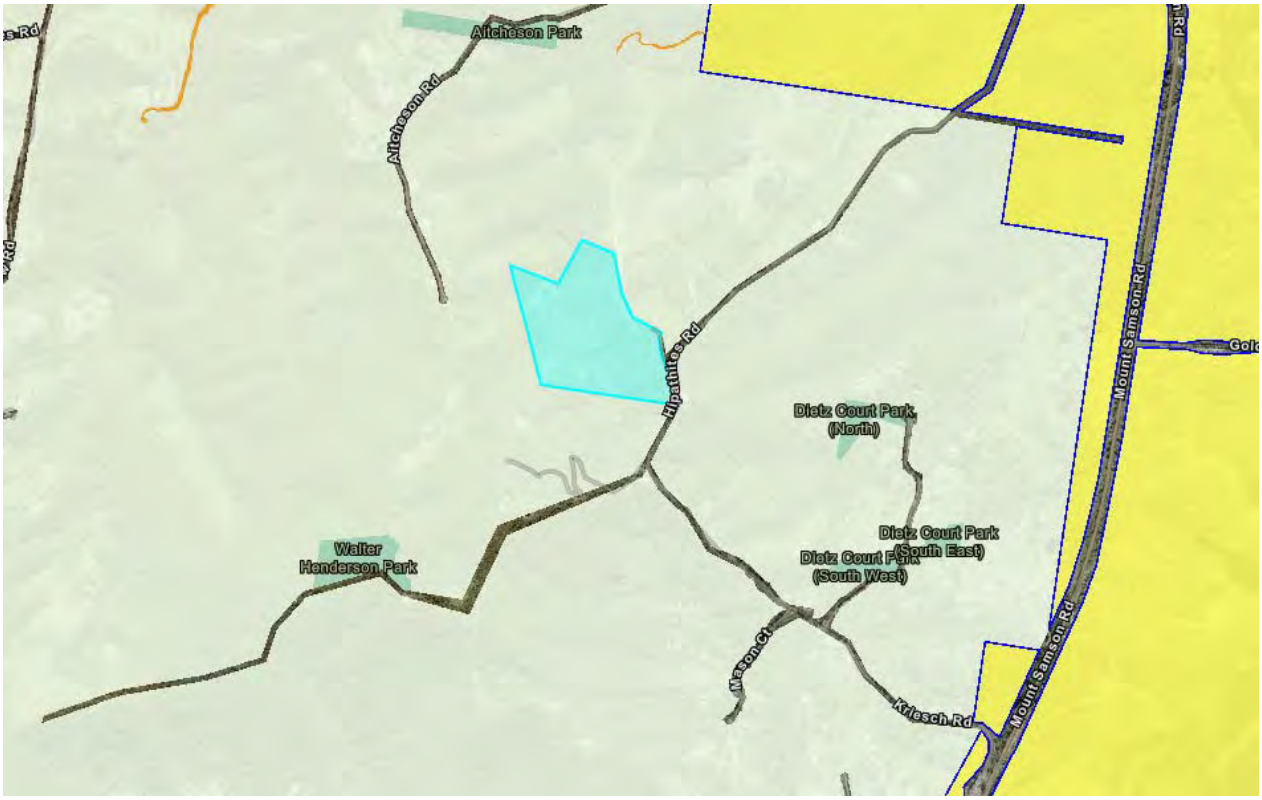
ITEM 2.1 DA/37146/2018/V2U - MATERIAL CHANGE OF USE - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 (Cont.)

#1 Locality Plan



ITEM 2.1 DA/37146/2018/V2U - MATERIAL CHANGE OF USE - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 (Cont.)

#2 Zoning Map



ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

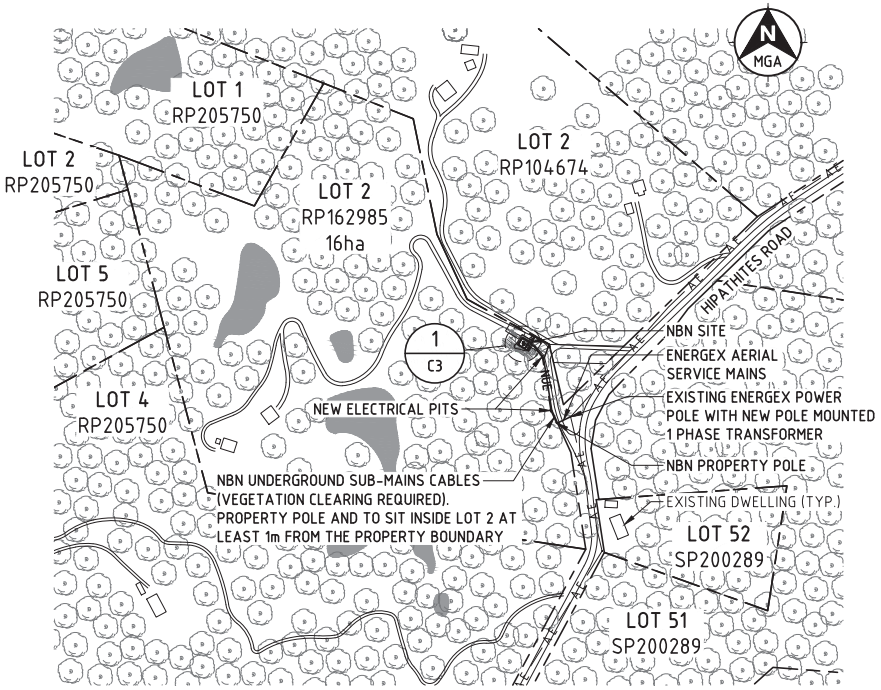
#3 Plans for approval

SITE LOCATION



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SITE CO-ORDINATES	
MONOPOLE LOCATION	
DATUM: MGA (GDA94)	ZONE: 56
LATITUDE	-27.26929°
LONGITUDE	152.83471°
EASTING	483 640
NORTHING	6 983 727



OVERALL SITE PLAN

SCALE 1:5000

LEGEND

- AE — AE — EXISTING AERIAL ELECTRICAL ROUTE
- AE — AE — AERIAL ELECTRICAL ROUTE
- NUE — NUE — NEW NBN UNDERGROUND ELECTRICAL ROUTE
- ——— – – ——— PROPERTY BOUNDARY

NOTES:

1. THE POWER ROUTE SHOWN ON THE DRAWINGS IS INDICATIVE ONLY. ELECTRICAL CONTRACTOR TO DETERMINE EXACT ROUTE. ELECTRICAL CONTRACTOR TO LOCATE AND IDENTIFY EXISTING U/G SERVICES PRIOR TO COMMENCEMENT OF WORK.
2. THE ELECTRICAL PITS SHALL BE PROVIDED EVERY 60m run AND EVERY MAJOR CHANGE IN DIRECTION. THE PITS SHALL BE ACO CABLE MATE TYPE 33 PIT 353 x 353 x 744 (D) PITS WITH AS 3996 CLASS B PIT COVER

Client: nbn

Client: ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

FOR CONSTRUCTION

Rev	Date	Revision Details
A	26.04.19	FOR CONSTRUCTION
03	09.01.19	LANDSCAPING UPDATED
02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

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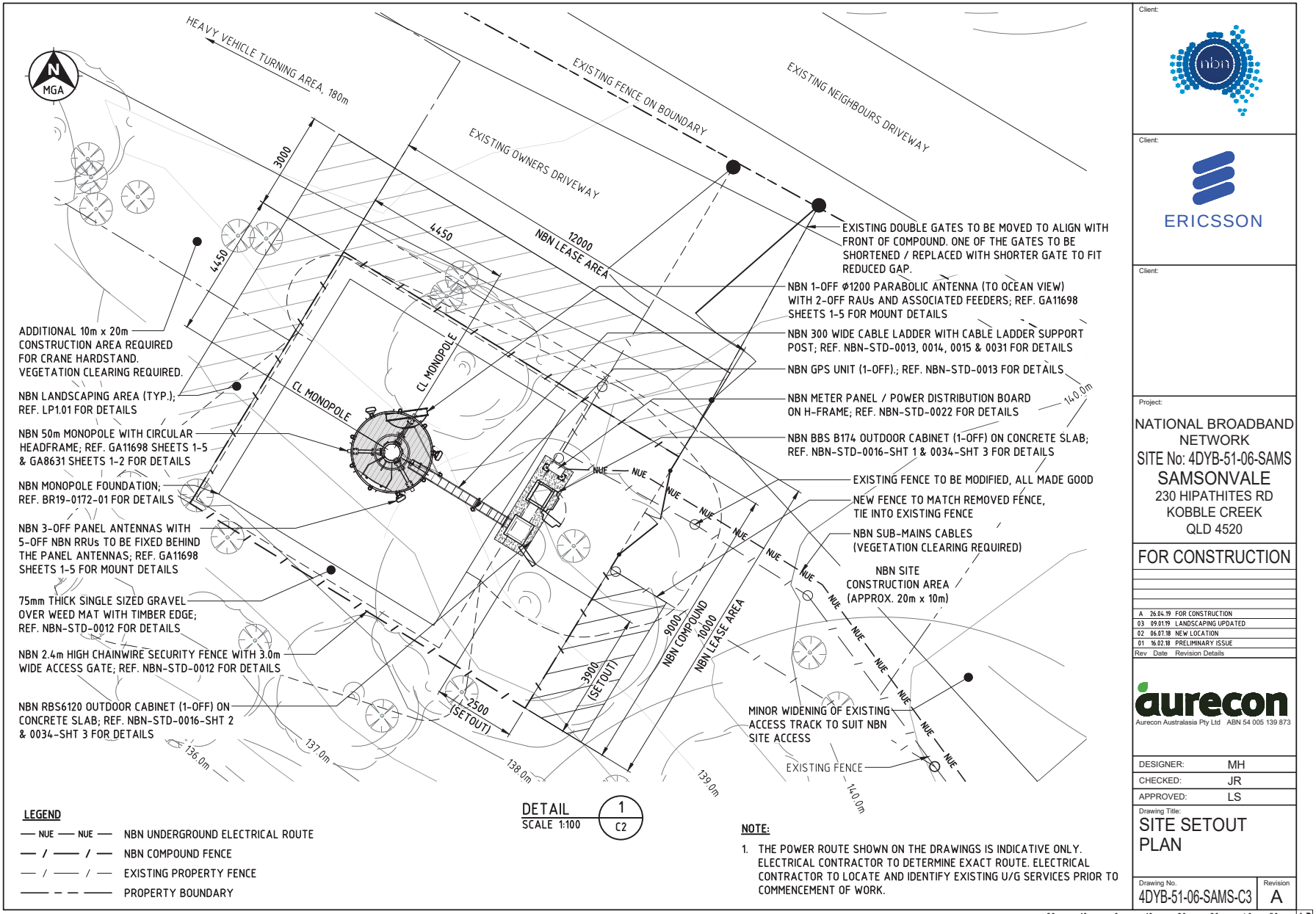
DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

Drawing Title:
OVERALL SITE PLAN

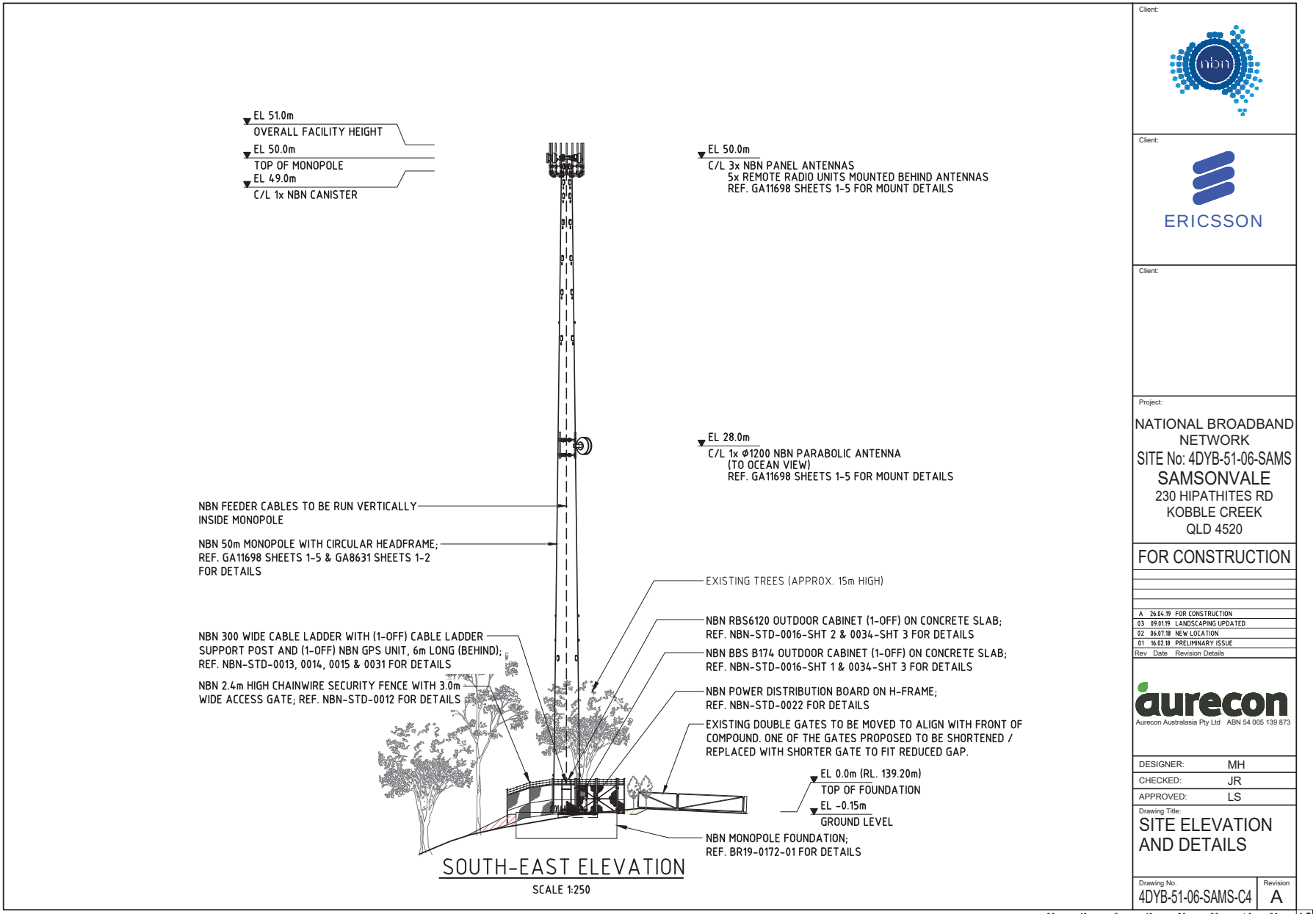
Drawing No.	Revision
4DYB-51-06-SAMS-C2	A

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EL 51.0m
OVERALL FACILITY HEIGHT
EL 50.0m
TOP OF MONOPOLE
EL 49.0m
C/L 1x NBN CANISTER
EL 50.0m
C/L 3x NBN PANEL ANTENNAS
5x REMOTE RADIO UNITS MOUNTED BEHIND ANTENNAS
REF. GA11698 SHEETS 1-5 FOR MOUNT DETAILS
EL 28.0m
C/L 1x Ø1200 NBN PARABOLIC ANTENNA
(TO OCEAN VIEW)
REF. GA11698 SHEETS 1-5 FOR MOUNT DETAILS
NBN FEEDER CABLES TO BE RUN VERTICALLY INSIDE MONOPOLE
NBN 50m MONOPOLE WITH CIRCULAR HEADFRAME; REF. GA11698 SHEETS 1-5 & GA8631 SHEETS 1-2 FOR DETAILS
EXISTING TREES (APPROX. 15m HIGH)
NBN 300 WIDE CABLE LADDER WITH (1-OFF) CABLE LADDER SUPPORT POST AND (1-OFF) NBN GPS UNIT, 6m LONG (BEHIND); REF. NBN-STD-0013, 0014, 0015 & 0031 FOR DETAILS
NBN RBS6120 OUTDOOR CABINET (1-OFF) ON CONCRETE SLAB; REF. NBN-STD-0016-SHT 2 & 0034-SHT 3 FOR DETAILS
NBN BBS B174 OUTDOOR CABINET (1-OFF) ON CONCRETE SLAB; REF. NBN-STD-0016-SHT 1 & 0034-SHT 3 FOR DETAILS
NBN 2.4m HIGH CHAINWIRE SECURITY FENCE WITH 3.0m WIDE ACCESS GATE; REF. NBN-STD-0012 FOR DETAILS
NBN POWER DISTRIBUTION BOARD ON H-FRAME; REF. NBN-STD-0022 FOR DETAILS
EXISTING DOUBLE GATES TO BE MOVED TO ALIGN WITH FRONT OF COMPOUND. ONE OF THE GATES PROPOSED TO BE SHORTENED / REPLACED WITH SHORTER GATE TO FIT REDUCED GAP.
EL 0.0m (RL. 139.20m)
TOP OF FOUNDATION
EL -0.15m
GROUND LEVEL
NBN MONOPOLE FOUNDATION; REF. BR19-0172-01 FOR DETAILS
SOUTH-EAST ELEVATION
SCALE 1:250
Client:
nbn
Client:
ERICSSON
Client:
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
FOR CONSTRUCTION
A 26.04.19 FOR CONSTRUCTION
03 09.01.19 LANDSCAPING UPDATED
02 06.07.18 NEW LOCATION
01 16.02.18 PRELIMINARY ISSUE
Rev Date Revision Details
aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873
DESIGNER: MH
CHECKED: JR
APPROVED: LS
Drawing Title:
SITE ELEVATION AND DETAILS
Drawing No.
4DYB-51-06-SAMS-C4
Revision
A
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20 10 0 10 20 30 40 50mm
A3

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

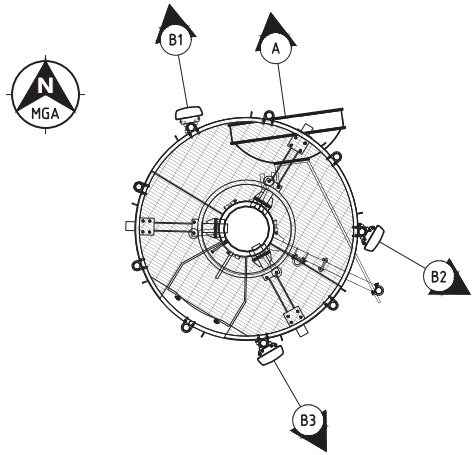
NBN ANTENNA CONFIGURATION – 3400MHz

SECTOR	SYMBOL	PANEL ANTENNA DETAIL								MAIN FEEDER DETAIL					RRU DETAIL						RF TAIL H&S 1/2" BIRD PROOFED LISCA CABLE	RET CABLE 1/TSR 484 21/2000
		TYPE	DIMENSION HxWxD	C/L HEIGHT	AZIMUTH (TN)	P1 & P2 E-TILT	P3 & P4 E-TILT	MECH TILT	ANTENNA ACTION REQ	TYPE	OVERALL LENGTH	CANISTER HEIGHT	CANISTER TO RRU LENGTH	FEEDER ACTION REQ	TYPE	LOCATION	C/L HEIGHT	ANTENNA PORT	RRU ACTION REQ	LENGTH	LENGTH
B1	B1	ARGUS SSPX310R	750x300x115	50m	350°	7°	7°	0°	INSTALL	H&S HYBRID MkII 6x6 (27.5mm)	60m	49m	2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
															RRUS2218	BEHIND	50m	3 & 4	INSTALL	1.5m	
B2	B2	ARGUS SSPX310R	750x300x115	50m	120°	6°	6°	0°	INSTALL				2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
B3	B3	ARGUS SSPX310R	750x300x115	50m	150°	5°	5°	0°	INSTALL				2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
															RRUS2218	BEHIND	50m	3 & 4	INSTALL	1.5m	
B4																					
B5																					
B6																					

NBN TRANSMISSION & GPS ANTENNA CONFIGURATION

ANTENNA	SYMBOL	ANTENNA DETAIL						MAIN FEEDER DETAIL			RAU DETAIL	
		TYPE	DIMENSION	C/L HEIGHT	AZIMUTH (TN)	DESTINATION	ANTENNA ACTION REQ	TYPE	OVERALL LENGTH	FEEDER ACTION REQ	QTY RAU	RAU ACTION REQ
A	A	PARABOLIC	ø1200	28m	352°	OCEAN VIEW	INSTALL	2x LDF1-50	38m	INSTALL	2	INSTALL
B												
GPS		KRE 101 2182/1	ø69x96	2.5m	N/A		INSTALL	LDF1-50	7m	INSTALL		

NOTE:
RRU HEIGHT TO BE +/- 250mm FROM SPECIFIED HEIGHTS. OFFSETS REQUIRED DUE TO MOUNTING ARRANGEMENT BACK TO BACK.



ANTENNA SETOUT PLAN
SCALE 1:50

Client:

Client:

ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

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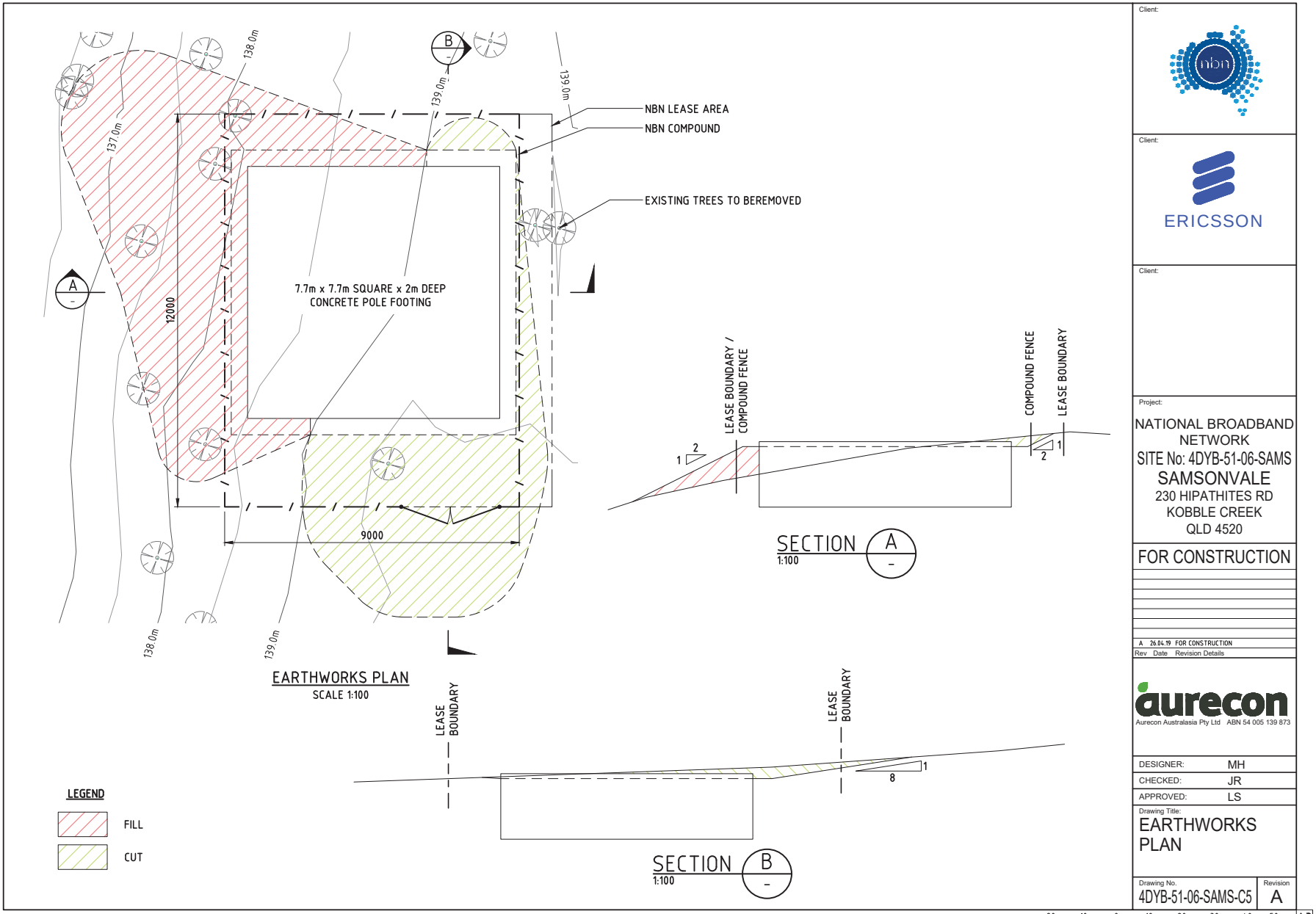
DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

Drawing Title:
NBN ANTENNA CONFIGURATION & SETOUT PLAN

Drawing No. 4DYB-51-06-SAMS-A1
Revision A

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20 10 0 10 20 30 40 50mm A3


138.0m
139.0m
139.0m
137.0m
NBN LEASE AREA
NBN COMPOUND
EXISTING TREES TO BEREMOVED
7.7m x 7.7m SQUARE x 2m DEEP
CONCRETE POLE FOOTING
12000
9000
138.0m
139.0m
EARTHWORKS PLAN
SCALE 1:100
LEASE BOUNDARY / COMPOUND FENCE
COMPOUND FENCE
LEASE BOUNDARY
SECTION A
1:100
LEASE BOUNDARY
LEASE BOUNDARY
SECTION B
1:100
LEGEND
FILL
CUT
Client:
Client:
ERICSSON
Client:
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
FOR CONSTRUCTION
A 26.04.19 FOR CONSTRUCTION
Rev Date Revision Details
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CHECKED: JR
APPROVED: LS
Drawing Title:
EARTHWORKS PLAN
Drawing No.
4DYB-51-06-SAMS-C5
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20 10 0 10 20 30 40 50mm
A3

230 Hipathities Road, Kobble Creek QLD (Lot 2 on RP162985) (Samsonvale)

Property Vegetation Management Plan

NBN Co

Reference: 247473

Revision: 1

14 May 2019

aurecon

Bringing ideas to life

Document control record

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Report title		Property Vegetation Management Plan				
Document code			**Project number**		247473	
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Client		NBN Co				
Client contact		Cezary Szablowski	**Client reference**			
Rev	**Date**	**Revision details/status**	**Author**	**Reviewer**	**Verifier** (if required)	**Approver**
0	2019-02-27	Rev 1	AC	MP		
1	2019-05-14	Rev 2	AC	MP		
Current revision		**1**				

Approval			
Author signature		Approver signature	
Name	Andrew Craig	Name	Max Peel
Title	Senior Ecologist	Title	Town Planner

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Table 7.2 Monitoring schedule of revegetation/restoration works

1 Introduction

1.1 Project background

The National Broadband Network (nbn™) has engaged Ericsson as the equipment vendor and Project Manager to establish the infrastructure required to facilitate the fixed wireless component of the nbn. Ericsson has in turn engaged Aurecon to act on its behalf in relation to the establishment of the required fixed wireless network infrastructure.

The national broadband network (nbn) is an upgrade to Australia's existing telecommunications network. It is designed to provide Australians with access to fast, affordable and reliable internet and landline phone services.

nbn™ plans to upgrade the existing telecommunications network in the most cost-efficient way using best-fit technology and taking into consideration existing infrastructure.

To support the fixed wireless component of this network, nbn™ requires a fixed wireless transmission site to provide fixed wireless internet coverage to the Samsonvale area.

An in-depth site selection process was undertaken in the area prior to confirming the site as the preferred location. This process matched potential candidates against four key factors, namely:

- Town planning considerations (such as zoning, surrounding land uses, environmental significance and visual impact)
- The ability of the site to provide acceptable coverage levels to the area
- Construction feasibility
- The ability for nbn™ to secure a lease agreement with the landowner

The nbn™ is proposing to establish a fixed wireless facility at 230 Hipathities Road, Kobble Creek QLD (Lot 2 on RP162985) (Samsonvale) (refer Figure 1). The proposed "Samsonvale" fixed wireless facility (henceforth referred to as the "the Project") comprises a new 50 m high lattice tower, along with ancillary components. It is proposed that the facility will be located on Lot 2 on RP162985, with entry to the facility through existing access tracks from Hipathaties Road, located to the east of the Project.

1.2 Purpose of the plan

Aurecon, on behalf of nbn™, are responding to information requested by Moreton Bay Regional Council (MBRC) (DA/37146/2018/V2U) dated 14 November 2018.

Specifically the development has requested in condition 5 the following in:

Environmental Planning

5. Performance Outcome PO99 in the Rural zone code requires that *Development avoids locating in a High Value Area or a Value Offset Area. Where it is not practicable or reasonable for development to avoid establishing in these areas, development must ensure that:*
   a. *the quality and integrity of the biodiversity and ecological values inherent to a High Value Area and a Value Offset Area is maintained and not lost or degraded;*
   b. *on-site mitigation measures, mechanisms or processes are in place demonstrating the quality and integrity of the biodiversity and ecological values inherent to a High Value Area and a Value Offset Area are maintained. For example, this can be achieved through replacement, restoration or rehabilitation planting as part of any proposed covenant, the development of a Vegetation Management Plan, a Fauna Management Plan, and any other on-site mitigation options identified in the Planning scheme policy - Environmental areas*.*

   Where the proposed development cannot avoid establishing in a Value Offset Area, mitigation measures need to be adopted which ensure the quality and integrity of the biodiversity and ecological values inherent to the Value Offset Area are maintained. This can be achieved through replacement, restoration or rehabilitation.

   It is necessary that the trees to be removed in the Value Offset Area to facilitate the telecommunication facility are replaced at a ratio of 3:1 (ie for every tree removed it is replaced by 3).

Information Request – Development Application No. DA/37146/2018/V2U **Page 3**

Provide details including a plan that demonstrates how and where this requirement will be delivered.

It is noted that Performance Outcomes PO100, PO102, and PO13 also require replacement and rehabilitation planting to occur.

For any queries in relation to the above matter/s please contact Rick Arnold on (07) 5433 2701.

It is the purpose of this plan to combine the information requested by MBRC as a single document to satisfy their information request.



Figure 1: Proposed development

2 Project layout

The Development Footprint (ie Plan of Layout) is presented in Figure 2. The Development Footprint has been prepared to illustrate:

- The location and extent of the site works
- Areas of proposed infrastructure
- Illustrate the location of vegetation to be cleared or potentially cleared (that within the proposed development and firebreak) and retained (that contained outside of the disturbance footprint)



Figure 2: Tree Plot and Restoration Area

3 Tree species within the area of impact

The location of trees contained within the development footprint and access track is presented in Figure 2. In total, 21 trees with a diameter of breast height (DBH) greater than, or equal to 15 cm are contained within or directly adjacent to the development footprint. Trees identified within the development footprint (including the access track), including comments related to their size and fauna habitat values, are presented in Table 3.1.

Table 3.1 Trees with a DBH > 15 cm, contained within the Development Footprint (refer Figure 2 for a tree plot)

Tree number	Scientific name	Common name	DBH	Height`	Spread	Co-ordinates		Comments/fauna features	Retain/remove
						Latitude	Longitude		
1	*Corymbia citriodora*	Spotted gum	230 mm	14 m	3 m	-27.269241	152.834724	No hollows present	Remove
2	*Eucalyptus propinqua*	Grey gum	250 mm	14 m	3 m	-27.269247	152.83472	Scratches	Remove
3	*Eucalyptus acmenoides*	White mahogany	130 mm	9 m	2 m	-27.269238	152.834663		Remove
4	*Eucalyptus propinqua*	Grey gum	130 mm	9 m	3 m	-27.269238	152.834654	One-sided	Remove
5	*Lophostemon confertus*	Brush box	230 mm	13 m	3 m	-27.269232	152.834622		Remove
6	*Corymbia citriodora*	Spotted gum	310 mm	18 m	5 m	-27.269237	152.834609		Remove
7	*Corymbia citriodora*	Spotted gum	180 mm	12 m	3 m	-27.269229	152.834606	One sided	Remove
8	*Eucalyptus propinqua*	Grey gum	290 mm	17 m	3 m	-27.269224	152.834604		Remove
9	*DEAD*		190 mm	10 m	2 m	-27.269218	152.834579	Termite nest	Remove
10	*Corymbia citriodora*	Spotted gum	280 mm	19 m	4 m	-27.269254	152.834567		Remove
11	*Corymbia citriodora*	Spotted gum	150 mm	12 m	2 m	-27.269301	152.834576		Retain
12	*Eucalyptus acmenoides*	White mahogany	200 mm	14 m	3 m	-27.269325	152.834562		Retain
13	*Eucalyptus acmenoides*	White mahogany	150 mm	11 m	2 m	-27.269337	152.834612	Dieback	Retain
14	*Corymbia citriodora*	Spotted gum	270 mm	14 m	3 m	-27.269347	152.834624		Retain
15	*Eucalyptus microcorys*	Tallowwood	180 mm	14 m	2 m	-27.26935	152.834627		Retain
16	*Eucalyptus acmenoides*	White mahogany	180 mm	13 m	3 m	-27.269312	152.834632		Remove
17	*Corymbia citriodora*	Spotted gum	200 mm	15 m	3 m	-27.269311	152.834653		Remove
18	*Eucalyptus siderophloia*	Northern grey ironbark	130 mm	10 m	2 m	-27.269321	152.834664		Remove
19	*Lophostemon confertus*	Brush box	280 mm	12 m	3 m	-27.269348	152.834678		Remove
20	*Eucalyptus acmenoides*	White mahogany	180 mm	13 m	2 m	-27.269376	152.834659		Retain
21	*Lophostemon confertus*	Brush box	180 mm	10 m	3 m	-27.269377	152.834638		Retain
22	*Eucalyptus propinqua*	Grey gum	760 mm	18 m	4 m	-27.269309	152.83477	3 hollows	Remove
23	*Eucalyptus propinqua*	Grey gum	370 mm	12 m	4 m	-27.269329	152.834847	One sided	Remove
24	*Eucalyptus propinqua*	Grey gum	340 mm	14 m	4 m	-27.269343	152.834858		Remove

Tree number	Scientific name	Common name	DBH	Height`	Spread	Co-ordinates		Comments/fauna features	Retain/remove
						Latitude	Longitude		
25	*Eucalyptus acmenoides*	White mahogany	280 mm	15 m	3 m	-27.26939	152.834875		Retain
26	*Corymbia citriodora*	Spotted gum	420 mm	16 m	5 m	-27.269375	152.834795		Remove
27	*Lophostemon confertus*	Brush box	190 mm	9 m	3 m	-27.269378	152.834769		Remove
28	*Corymbia citriodora*	Spotted gum	390 mm	17 m	2 m	-27.269354	152.834743	Dieback/trunk damage	Remove
29	*Corymbia citriodora*	Spotted gum	170 mm	14 m	2 m	-27.269364	152.83472		Remove

4 Project management

4.1 Key aims and outcomes

- To formulate and implement vegetation management actions
- To clearly identify objectives, methodologies and reporting lines
- To inform all relevant stakeholders of their responsibilities

4.2 Approach

This Property Vegetation Management Plan will form an integral part of the Project's construction phase. Any vegetation clearing works associated with the Project are to follow the measures stipulated in this plan.

Should vegetation clearing works be required to extend beyond the limits specified in this plan (shown on Figure 2 as the Development Footprint), approval must be sought from the appropriate authorities and relevant amendments made to this plan prior to works commencing.

The vegetation management actions and the methods to be employed to monitor the implementation and success of the actions are provided in Section 5 of this plan.

4.2.1 Training and awareness

All staff personnel, contractor staff, consultants and subcontractors will be made aware of their role in vegetation management on the Project site prior to the commencement of clearing activities.

All staff personnel, contractor staff, consultants and subcontractors will be required to complete a site induction prior to commencing any site work. The site induction will include, but will not be limited to, the following points:

- Site personnel will be informed that vegetation clearing must only occur in areas that have been marked for clearing and approved by the relevant agencies
- Site personnel will be advised of areas that are to be retained and remain undamaged by the project activities
- Vehicle traffic must remain on designated tracks only and not disturb surrounding vegetation unless authorised to do so
- Contractors shall not knowingly introduce any Restricted Matter as listed in Schedule 2 of the *Biosecurity Act 2015*. Contractors will be responsible for ensuring all machinery under their control is pest and weed free
- Site personnel will be informed that all native wildlife is protected and shall not be intentionally harmed, stressed or otherwise impacted as a result of works or workers' actions
- Site personnel will not interfere with any fauna in any way. If an animal is impeding project works, staff will not be permitted to interfere with the animal in any way. In such cases staff must wait for the animal to move on or contact a qualified and registered spotter/catcher to relocate the animal.
- Site personnel are to be made aware of the species inhabiting the area and any potential risk the animals may pose (eg snakes)
- Site personnel will be educated in relation to the risks of fauna deaths and how to manage animals that are injured, displaced or orphaned species. Site personnel must contact a certified spotter catcher should the situation arise, and any injured fauna must be safely taken to the nearest vet by the spotter catcher.

- An inspection of any trenches and other structures that have the potential to act as fauna traps, are to be undertaken on a daily basis where applicable, to determine whether there are any trapped or injured fauna species present and employ the relevant action as appropriate to ensure the health/wellbeing of the animal

4.2.2 Point of contact

The contact details of the person nominated to oversee the vegetation clearing works and responsible for implementing the vegetation management actions on site are provided below:

Name: Cezary Szablowski
Position: Field Manager
Company: Visionstream
Telephone: 0429 389 225
Email: Cezary.Szablowski@visionstream.com.au

5 Vegetation protection

5.1 Key aims and outcomes

- To limit vegetation clearing to that which is necessary for the construction of the nbn Project and protect and reduce environmental impacts

5.2 Approach

Table 5.1 presents the vegetation protection measures to be implemented during the Project construction phase.

Table 5.1 Vegetation management measures

Management measure ID	Control activity	Timing	Responsibility	Monitoring and reporting compliance		
				Activity	Activity timing	Activity performed by
Vegetation management						
VM 1	Comply with the mitigation measures outlined in this Plan	PD	All staff	PI/CL	PD	All staff
VM 2	In the instance where undertaking an action identified in this Plan represents a threat to human safety, the action is not to be undertaken. Records are to be kept detailing why the action was not undertaken and ensure that these records are made available to any relevant administering authority upon request	PD	SM	PI/CL	PD	All staff
VM 3	Ensure that vegetation clearing boundaries are established with visible and physical markings delineating the disturbance footprint and ensure that all contractors are aware of these boundaries	Pre C	SM/HSER	PI	WR	SM/HSER or delegate
VM 4	The clearing of all areas will be restricted to the areas contained within the disturbance footprint as indicated on Figure 2 (also see Appendix A) to enable safe construction, operation and maintenance of the project infrastructure.	PD	SM	PI/CL	PD	SM
VM 5	No vegetation clearing is to take place without the appropriate vegetation clearing permits issued by the relevant government authority in place	PD	SM	PI/VI/CL	PD	SM/PE/HSER
VM 6	No vegetation is to be burned as a form of removal or disposal	PD	PE/HSER/SM	PI	PD	PE/SM
VM 7	Native tree species which are cleared, damaged or unintentionally removed during construction activities, this must be replaced by the proponent or relevant contractor, at a ratio of 3:1. The identification of trees to be removed is provided in Figure 2 and Table 3.1. Vegetation will be planted, where practical, on the subject lot following final profiling. Specimens planted as part of the compensatory planting will be sufficiently watered and maintained until establishment (ie 6 months). Plants that die during this 6-month period are to be replaced (replanted) at a ratio of 1:1.	PD	HSER/SM	PI	WR	HSER/SM
VM 8	Where practical, cleared vegetation will be recycled on site as mulch and used for purposes such as landscaping and rehabilitation	PD	HSER/SM	PI	WR	HSER/SM
VM 9	Rehabilitation monitoring will occur post disturbance, to ensure that ground stability has been achieved with no instances of erosion or scouring. The viability of planted vegetation will be assessed at this time. In instances where planted specimens have died within 6 months of planting, these specimens will be replaced using the same species. Plants will be watered and tendered sufficiently to ensure their establishment. In instances where erosion and/or scouring has occurred remediation works must be undertaken as soon as reasonably practical.	WR	HSER/SM	PI/VI	WR	HSER/SM

Management measure ID	Control activity	Timing	Responsibility	Monitoring and reporting compliance		
				Activity	Activity timing	Activity performed by
Fauna management						
VM 10	All site personnel are to be made aware of local fauna that could occur on site. Fauna are only to be handled by suitably qualified personnel	PD	SM/HSER	PI/VI	WR	HSER
VM 11	Implement fauna escape devices such as planks within trenches where practical to enable fauna to exit hazardous areas within the construction site.	PD	PM/HSER	VI	WR	PM
VM 12	A certified fauna spotter/catcher (ie holding a Damage Mitigation Permit (Removal and Relocation of Wildlife) and/or Rehabilitation Permit (issued by the *Department of Environment and Science* (DES)) will be engaged, as needed (ie where fauna habitat is identified such as trees containing hollows, or in instances where there is a likelihood that fauna may be adversely impacted by the clearing activities). The fauna spotter/catcher is to inspect the project area immediately prior to vegetation clearing. The Contractor will give notice to the Principal prior to commencing any clearing within the project area. The fauna spotter/catcher will: ■ Identify and clearly mark (onsite with flagging tape or similar) and map all hollow bearing and potentially hollow bearing trees, as well as hollow logs, immediately prior to vegetation clearing. These will be retained wherever practicable. Identification of all habitat trees requiring specific management measures will occur prior to developing a clearing schedule for the project so that sufficient time is allowed for removal of hollow bearing trees ■ Clearly identify clearing boundaries within the approved disturbance footprint. No clearing or disturbance is to occur outside these boundaries ■ Where practical, active breeding nests will be relocated prior to clearing ■ Identify infrastructure which is used by fauna (eg culverts may be used by some species for shelter/roosting). This is to be tagged and to remain undisturbed until the spotter/catcher has relocated any fauna inhabiting such areas	Pre C	HSER/SM	PI/CL	WR	HSER

Management measure ID	Control activity	Timing	Responsibility	Monitoring and reporting compliance		
				Activity	Activity timing	Activity performed by
VM 13	Ensure any trees proposed for disturbance containing hollows, have the timber containing hollows removed (as outlined below) by a qualified arborist and a certified spotter/catcher **prior** to the commencement of any clearing in order to safely remove any fauna species which might be located inside. Actions to be implemented include: ■ Hollows identified as containing fauna shall be plugged with a suitable material such as a towel, the section removed from the tree and gently lowered to the ground using ropes. Measures will be taken to avoid injuring animals. ■ Displaced fauna shall then be relocated (within their hollows) to a suitable, previously identified recipient site, provided the animal did not sustain any injuries. Any injured animals (native or introduced) are to be taken to receive veterinary attention immediately. Once recovered, animals will be relocated to an area of similar habitat adjoining the project area ■ All removed hollows not containing fauna shall be reattached to suitable trees in suitable recipient sites or adjacent to the project area ■ In the case of the presence of other fauna species, the spotter/catcher will encourage the fauna to leave by reasonable means or capture and relocate it in the local environment prior to felling and trimming. If the spotter/catcher determines that a fauna species is present in a tree he/she will remove the animal prior to the felling of that tree or any tree of which the crown overlaps that tree. All members of staff have an obligation to report any fauna species seen in areas to be cleared to the fauna spotter/catcher prior to clearing ■ A method of removing the hollows will be implemented which ensures that hollows are gently lowered to the ground and the chance of fauna mortality is minimized	Pre C	HSER/SM	PI/CL	WR	HSER
VM 14	Where practical, any fauna to be relocated will be moved to an area of similar habitat adjoining the project area. Suitable relocation areas will be identified prior to the commencement of clearing	Construction	HSER/SM	PI/CL	WR	HSER
VM 15	The Principal will report any environmental incidents, including those which involve harm to native wildlife, to DES within 24 hours of the incident occurring. The report will include details on the location and cause of the incident, extent of impact and corrective action taken. Report are to be submitted to: wildlife.management@ehp.qld.gov.au	PD	SM	PI	PD	SM
Vehicle movement and storage						
VM 16	All vehicles will remain on designated tracks and roadways within the project footprint	PD	All Staff	PI/CL	PD	SM
VM 17	Exclude parking of vehicles, storage of plant and equipment and stockpiling from the drip zones of trees (to avoid soil compaction)	PD	All Staff	PI/CL	PD	SM

Management measure ID	Control activity	Timing	Responsibility	Monitoring and reporting compliance		
				Activity	Activity timing	Activity performed by
VM 18	Place appropriate signage as required in prominent positions within the project area to reduce speed, promote awareness and provide safety for fauna crossing or inhabiting the area	Pre C	PE/HSER/SM	PI	WR	SM
VM 19	Storage of machinery, materials or equipment shall be within designated areas that have already been disturbed and outside of the drip zone of any trees. Areas outside of the Project footprint must not be disturbed in order to create storage areas	PD	All Staff	PI/CL	PD	SM
VM 20	Ensure all contractors are aware that all waste must be discarded in suitable waste receptacles that cannot be accessed by wildlife and must be removed from site following project completion	PD	SM/PE	VI	Daily	PE
Pest and weed management						
VM 21	Fill and imported soil materials if required for use on site, are to be sourced from weed free areas or suppliers	PD	HSER/SM	PI/VI/CL	Weekly	HSER/SM
VM 22	Weekly visual inspections are to be conducted by the HSER to identify any significant weed infestation. Any restricted matter as identified in Schedule 2 of the *Biosecurity Act 2015*, are to be controlled as necessary and as specified in the approved Ecological Restoration Plan.	PD	HSER	VI	Weekly	HSER
VM 23	Any vehicles or machinery coming onto site from an area known to contain a restricted matter as identified in Schedule 2 of the *Biosecurity Act 2015,* are to be washed down prior to entry to site.	PD	HSER/SM	Monitoring	Daily	HSER/SM
VM 24	A weed audit/inspection will be undertaken at the completion of construction and as specified in the approved Ecological Restoration Plan.	WR	HSER/SM	PI/VI	WR	HSER/SM
Erosion, drainage and sediment control						
VM 25	No stormwater will be discharged from the site without passing through appropriate treatment devices.	PD	HSER/SM	VI	Weekly and daily during rainfall event	PE
VM 26	Material stockpile areas shall be located as far as practicable from sensitive receptors such as drainage lines, creeks and roads	PD	HSER/SM	PI	As required during earthworks	PE and sub-contractors
VM 27	Sediment fences shall be located along the downslope construction boundary fence as required. Sediment fence posts should have maximum spacing of 2m and be installed appropriately.	PD	HSER/SM	VI/PI	Weekly	Sub-contractors PE and HSER

Management measure ID	Control activity	Timing	Responsibility	Monitoring and reporting compliance		
				Activity	Activity timing	Activity performed by
VM 28	Sediment fences must be inspected daily for UV degradation, effectiveness and capacity (maintained at greater than 60%). Sediment fences must not be removed until disturbed areas have been stabilised. Replacement is to occur as required.	PD	HSER/SM	VI/PI	Weekly	HSER/Sub contractor
VM 29	All truck loads will be covered as required for potentially dusty materials exiting the site.	PD	SM	VI	WR	HSER/PE

Table notes:

Pre C Pre Construction
PD Project Duration
WR When Required
SM Site Manager
PE Project Engineer
VI Visual inspection
HSER Environmental Representative
PI Practical Implementation
CL Checklist

6 Clearing and disposal

6.1 Key aims and outcomes

- To minimise the adverse impacts of vegetation clearance
- To maximise recycling or reuse of cleared vegetation

6.2 Approach

Figure 1 illustrates the proposed development area. Figure 2 illustrates the location and extent of the site works, and Table 3.1 identifies trees and their associated habitat features contained within the development area. Table 5.1 provides a number of mitigation measures which will be implemented to minimise adverse impacts associated with vegetation clearing, including the clear demarcation of vegetation clearing limits and the recycling of cleared vegetation on site for mulch where appropriate.

The following sections provide further information relating to the existing vegetation structure and habitat value of the proposed clearing area and the areas of vegetation to be retained on the subject lot.

6.2.1 Proposed clearing area

The subject lot upon which the project is contained is a rural property containing regrowth vegetation described as RE 12.11.5/12.11.3. The vegetation within the project area is described as Category C area containing a least concern regrowth regional ecosystem. Re 12.11.5 is described as "*Corymbia citriodora subsp. variegata* woodland to open forest +/- *Eucalyptus siderophloia/E. crebra*, *E. carnea, E. acmenoides, E. propinqua* on metamorphics +/- interbedded volcanics and RE12.11.3´ *Eucalyptus siderophloia, E. propinqua +/- E. microcorys, Lophostemon confertus, Corymbia intermedia, E. acmenoides* open forest on metamorphics +/- interbedded volcanics (refer Photograph 1 and Photograph 2). A single dwelling and shed infrastructure is located on Lot 2 RP162985. The subject land contains some steep variable topography that slopes towards the south west.

The site is located to the west of Hipathities Road and located within a rural setting (refer Figure 1 and Figure 2). Access to the subject site will be provided via the existing property access from Hipathities Road (refer Photograph 3).

Twenty-one (21) trees are required to be removed for the proposed compound area and access route. These trees are indicated in Figure 2 and identified in Table 3.1. Section 3 provides further details related to trees contained within the disturbance footprint.

6.2.2 Vegetation to be retained

Vegetation to be removed is indicated in Figure 2 as all vegetation located outside of the disturbance footprint will remain untouched (ie vegetation contained outside of the proposed area and associated access routes).



Photograph 1 Location of proposed monopole and associated ancillary components



Photograph 2 Existing grassy access track from Betts Road to proposed compound area.



Photograph 3 Existing access track from Hipathities Road

7 Rehabilitation and maintenance

7.1 Key aims and outcomes

- To restore landforms and topsoil to facilitate natural recruitment processes post construction phase
- To maximise survival opportunities of retained vegetation adjacent to areas disturbed as part of the project construction activities

7.2 Approach

Earth disturbance and vegetation proposed for removal has been limited to that which is considered necessary to facilitate project construction and safe operation (refer Figure 1 and Figure 2).

Areas within the project footprint that are disturbed during construction and do not support infrastructure will be rehabilitated in relation to landform and topsoil to facilitate the natural recruitment of locally occurring flora species. An indicative rehabilitation area has been provided in Figure 2. The proposed rehabilitation area is subject to change and may be relocated if greater rehabilitation value can be obtained by relocating the proposed rehabilitation area.

The following species list, planting densities and numbers are required to be established within a designated rehabilitation area. Based on the Council ratio of 3:1 the number of plants to be planted is 63. The restoration area have been allocated within the project development area and will be planted to not only satisfy the offset requirements but to also provide additional screening to the proposed development area therefore reducing the visual impact of the Project. Species and number for rehabilitation are contained in Table 7.1. The flora species utilized for rehabilitation have been derived from RE 12.11.5/12.11.3.

The vegetation within the project area is described as Category C area containing a least concern regrowth regional ecosystem. Re 12.11.5 is described as "*Corymbia citriodora subsp. variegata* woodland to open forest +/- *Eucalyptus siderophloia/E. crebra*, *E. carnea, E. acmenoides, E. propinqua* on metamorphics +/- interbedded volcanics and RE12.11.3´ *Eucalyptus siderophloia, E. propinqua +/- E. microcorys, Lophostemon confertus, Corymbia intermedia, E. acmenoides* open forest on metamorphics +/- interbedded volcanics

Table 7.1 Species palette for restoration based on RE 12.11.5/12.11.3

Scientific name	Common name	Planting density	Quantity
Canopy Layer			
Eucalyptus siderophloia	Northern grey Ironbark		3
Eucalyptus microcorys	Tallowwood		5
Eucalyptus propinqua	Grey gum	Approximately 1 plant/4 m^2	5
Lophostemon confertus	Brush box		10
Eucalyptus acmenoides	White mahogany		10
Corymbia citriododra	Spotted gum		30

The following maintenance works will be undertaken on site, following construction, to ensure the cleared areas are suitably rehabilitated and maintained:

The revegetation site will be maintained and monitored to assess the success of the restoration works. The monitoring and maintenance schedule has been summarised in Table 7.2.

Table 7.2 Monitoring schedule of revegetation/restoration works

Timing	Task	Remedial Action	Responsibility
Preliminary Pre-planting Phase	1. Undertake preliminary inspection of restoration area to ensure the following:	1. Identify areas for treatment for declared plants and weeds	Restoration Ecologist and Rehabilitation Contractor
	2. Check that the appropriate restricted plant and weed control has been implemented.	2. Undertake these tasks if not appropriately completed	
	3. Check erosion hazards have been repaired and that erosion and sediment control devices are in place as required		
	4. Aquire mulch, fertiliser, sun hardened seedlings etc; and		
	5. Establish exclusion fencing and signage to exclude the area from unauthorised vehicle access		
Initial Restoration	1. Any necessary follow-up restricted plant and weed control.	1. Undertake initial restoration works as per the approved Restoration Plan	Restoration Ecologist and Rehabilitation Contractor
	2. Install plant tubestock, mulch and water.		
First week after planting	1. Water newly installed seedlings DAILY for the first week.	1. Replace damaged seedlings; and	Rehabilitation Contractor
		2. Weak or leaning plants are to be staked.	
Month 1	1. Water newly installed seedlings EVERY SECOND DAY for remainder of the first month.	1. Replace damaged seedlings and stake weak or leaning plants	Rehabilitation Contractor
Month 2	1. Water newly installed seedlings twice each week during month 2 after planting or as required. Additional watering may be required when rainfall is low.	1. Replace damaged seedlings and replace mulch as required	Rehabilitation Contractor
	2. Check exclusion signage is still in place	2. Implement erosion and sediment control ie jute matting, mulch, sediment control fencing in areas suffering erosion.	
	3. Check that erosion and sediment control devices are in place		
	4. Check for disturbances from pests or vandals; and		
	5. Check for signs of soil erosion and instability		
Month 3	1. Check mulch	1. Replace damaged seedlings and replenish mulch where required;	Restoration Ecologist and Rehabilitation Contractor
	2. Check for erosion and sediment control	2. Implement erosion and sediment control ie jute matting, mulch, sediment control fencing in areas suffering erosion.	
	3. Monitor site for presence of restricted plants and weeds.	3. Treat restricted plants and weeds and spray/remove to prevent the spread of other emergent weeds	

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

Timing	Task	Remedial Action	Responsibility
	4. Monitor rehabilitation progress and seedling health.		
Month 6	1. Check for erosion and sediment control	1. Implement erosion and sediment control ie jute matting, mulch, sediment control fencing in areas suffering erosion.	Restoration Ecologist and Rehabilitation Contractor (weed monitoring and control)
	2. Monitor site for presence of restricted plants and weeds.	2. Replace damaged seedlings and replenish mulch where required;	
	3. Monitor rehabilitation progress and seedling health	3. Additional watering when rainfall is low; and	
		4. Treat restricted plants and weeds and spray/remove to prevent the spread of other emergent weeds.	
Month 12	1. Check for erosion and sedimentation;	1. Report restoration progress result to client.	Restoration Ecologist and Rehabilitation Contractor (weed monitoring and control)
	2. Monitor declared plants and weeds, record progress and ongoing weed issues;		
	3. Monitor and record rehabilitation progress and seedling health; and		
	4. Review the first 12 months of the monitoring schedule and assess effectiveness of Restoration Plan		
Month 18	1. Check for erosion and sedimentation;	1. Implement erosion and sediment control ie jute matting, mulch, sediment control fencing in areas suffering erosion.	Restoration Ecologist and Rehabilitation Contractor (weed monitoring and control)
	2. Monitor declared plants and weeds, record progress and ongoing issues; and	2. Replace damaged seedlings and replenish mulch where required;	
	3. Monitor and record restoration progress and seedling health.	3. Additional watering when rainfall is low; and	
		4. Treat restricted plants and weeds and spray/remove to prevent the spread of any other emergent weeds	
Month 24	1. Check for erosion and sedimentation;	1. Replace damaged seedlings and replenish mulch;	Restoration Ecologist and Rehabilitation Contractor (weed monitoring and control)
	2. Monitor declared plants and weeds, record progress and ongoing issues; and	2. Additional watering when rainfall is low; and	
	3. Monitor and record restoration progress and seedling health.	3. Treat restricted plants and weeds and spray/remove to prevent the spread of any other emergent weeds	
	4. Prepare documentation and evidence of restoration works completion for lodgement to Council		

8 Conclusion

This PVMP provides mitigation strategies to reduce impacts to extant flora and fauna species located within and adjacent to the Project area.

Compliance with the mitigations strategies contained within this PVMP will ensure that the proposed works are conducted in a sustainable manner.

Should situations arise in relation to flora and fauna that have not been addressed in this PVMP, works are to cease until such time and this PVMP is amended to address the unforeseen circumstance.

A

General Arrangement Drawing

DATE OF ISSUE		16.02.18	06.07.18	09.01.19	26.04.19		
DRAWING PACKAGE VERSION		1	2	3	4		
GENERAL							
4DYB-51-06-SAMS-T1	COVER SHEET	01	02	03	A		
4DYB-51-06-SAMS-T2	REFERENCE DOCUMENTS				A		
4DYB-51-06-SAMS-C1	SITE SPECIFIC NOTES	01	02	03	A		
4DYB-51-06-SAMS-C2	OVERALL SITE PLAN	01	02	03	A		
4DYB-51-06-SAMS-C3	SITE SETOUT PLAN	01	02	03	A		
4DYB-51-06-SAMS-C4	SITE ELEVATION AND DETAILS	01	02	03	A		
4DYB-51-06-SAMS-C5	EARTHWORKS PLAN				A		
LP1.01	LANDSCAPE PLAN				A		
ELECTRICAL							
4DYB-51-06-SAMS-E0	ELECTRICAL SPECIFICATION				A		
4DYB-51-06-SAMS-E1	ELECTRICAL SINGLE LINE DIAGRAM & PDB SCHEMATIC				A		
4DYB-51-06-SAMS-E2	SITE EARTHING PLAN				A		
RF AND TX CONFIGURATIONS							
4DYB-51-06-SAMS-A1	NBN ANTENNA CONFIGURATION & SETOUT PLAN	01	02	03	A		
STRUCTURAL							
CIVIL							
MONOPOLE DOCUMENTATION							
GA11698 (SHEETS 1-5)	GENERAL ARRANGEMENT OF 50m COMMUNICATION HUB TYPE SPECIAL POLE				0		
	LADDER WITH LADSAF - BASE PLATE MOUNTED						
GA8631 (SHEETS 1-2)	GENERAL ARRANGEMENT OF FOUNDATION BOLT AND TEMPLATE ASSEMBLY				1		
	36 OFF M48 x 1580 LONG BOLTS EQUISPACED ON 1980mm PITCH						
FORM 15	50m COMMUNICATION POLE & FOUNDATION BOLTS - STRUCTURE				/		
FORM 15	50m COMMUNICATION POLE FOOTING - STRUCTURE				/		
JL1025	CERTIFICATE OF COMPLIANCE - DESIGN & MANUFACTURE				1		
BR190172	STRUCTURAL DESIGN CERTIFICATE (14.03.2019)				/		
BR19-0172-01	NBN SAMSONVALE 50m COMMUNICATIONS POLE FOOTING				-		
AZIMUTH LETTER	INGAL EPS LETTER DATE 18 AUGUST 2016				/		
LEASE							
SP301235	PLAN OF LEASE A IN LOT 2 ON RP162985				/		
DISTRIBUTION							
ERICSSON	KATE DOUGHAN	1	1	1	1		
AURECON	LISA SHIELDS	1	1	1	1		

SITE No: 4DYB-51-06-SAMS
SAMSONVALE

230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

RFNSA No.: 4520024

Australia's broadband network

PROJECT SUMMARY

NBN GREENFIELD 50m MONOPOLE
NBN OUTDOOR CABINETS ON CONCRETE SLAB ON THE GROUND

Client:

ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

FOR CONSTRUCTION

Rev	Date	Revision Details
A	26.04.19	FOR CONSTRUCTION
03	09.01.19	LANDSCAPING UPDATED
02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873

DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

Drawing Title: COVER SHEET

Drawing No: 4DYB-51-06-SAMS-T1
Revision: A

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20 10 0 10 20 30 40 50mm A3

SITE INFORMATION:

1. SITE ADDRESS
LOT 2 ON RP162985, 230 HIPATHITES RD, KOBBLE CREEK, QLD 4520.

2. GENERAL
THE CONTRACTOR SHALL COMPLY WITH ALL RELEVANT NBN CONSTRUCTION STANDARDS, CURRENT AUSTRALIAN STANDARDS AND SPECIFICATIONS.

3. SITE ACCESS
ACCESS FROM EXISTING DRIVEWAY OFF HIPATHITES ROAD.

4. EQUIPMENT
NBN OUTDOOR CABINETS TO BE INSTALLED ON CONCRETE SLAB (<7.5m^2 GFA) WITHIN NBN LEASE AREA.

5. STRUCTURE
NBN 50m MONOPOLE BY INGAL EPS

6. ANTENNA ACCESS
ANTENNAS ARE TO BE ACCESSED USING ACCESS LADDER WITH LAD-SAF OR EWP, BY RIGGER QUALIFIED PERSONNEL ONLY.

7. EXISTING SERVICES
THE CONTRACTOR SHALL IDENTIFY AND CONFIRM THE LOCATION OF ALL EXISTING SERVICES AS REQUIRED PRIOR TO COMMENCEMENT OF WORKS.

8. EXISTING SITE HAZARDS
THE FOLLOWING HAZARDS ARE PRESENT ON THIS SITE:
- WORK IN REMOTE AREA
- STEEP SLOPE AT REAR OF SITE
- DENSE VEGETATION

9. ELECTRICAL SUPPLY
REFER TO DRAWINGS 4DYB-51-06-SAMS-C2, C3, E0 & E1 FOR DETAILS. CONDITIONS OF SUPPLY SUBJECT TO ENERGEX OFFER.

10. TRANSMISSION LINK & RF CONFIGURATION
REFER TO TABLE ON DRAWING 4DYB-51-06-SAMS-A1.

11. SITE SPECIFIC INFORMATION
- NO STORMWATER DETENTION IS REQUIRED
- LANDSCAPING REQUIRED. REFER TO LANDSCAPING PLAN LP1.01 FOR DETAILS
- VEGETATION CLEARING TO BE UNDERTAKEN IN ACCORDANCE WITH APPROVED VEGETATION MANAGEMENT PLAN
- REHABILITATION OF VEGETATION REQUIRED. REHABILITATION TO BE UNDERTAKEN IN ACCORDANCE WITH APPROVED VEGETATION MANAGEMENT PLAN
- CONDITIONS OF APPROVAL YET TO BE RECIEVED
- NO EASEMENTS ARE EXISTING OR PROPOSED OVER SITE LOT

12. WIND LOAD PARAMETERS

SITE TOPOGRAPHIC DATA		
REGION	TERRAIN CATEGORY	TOPOGRAPHIC MULTIPLIER (Mt)
B	2.0	1.50

13. SITE SIGNAGE AND LOCATION
- SITE ENQUIRY SIGN, ON THE NBN ODC DOOR
- HAZARDOUS VOLTAGE SIGN, ON NBN METER PANEL/PDB
- CLIMBING FALL ARREST SIGNAGE, CLOSE TO CLIMBING RUNG OR TO LADDER LOCATION (REFER RAN HANDBOOK SECTION 15.4 FOR FURTHER DETAILS)
- EME SIGNAGE, REFER NBN-STD-0025

14. DIAL BEFORE YOU DIG
DBYD JOB NUMBER - 14473718
ENQUIRY DATE: 27/06/2018
CONTRACTOR SHALL REVALIDATE AND VERIFY AT THE TIME OF CONSTRUCTION.

Client:

Client:
ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

FOR CONSTRUCTION

Rev	Date	Revision Details
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aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873

DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

Drawing Title:
SITE SPECIFIC NOTES

Drawing No: 4DYB-51-06-SAMS-C1
Revision: A

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20 10 0 10 20 30 40 50mm A3

SITE LOCATION

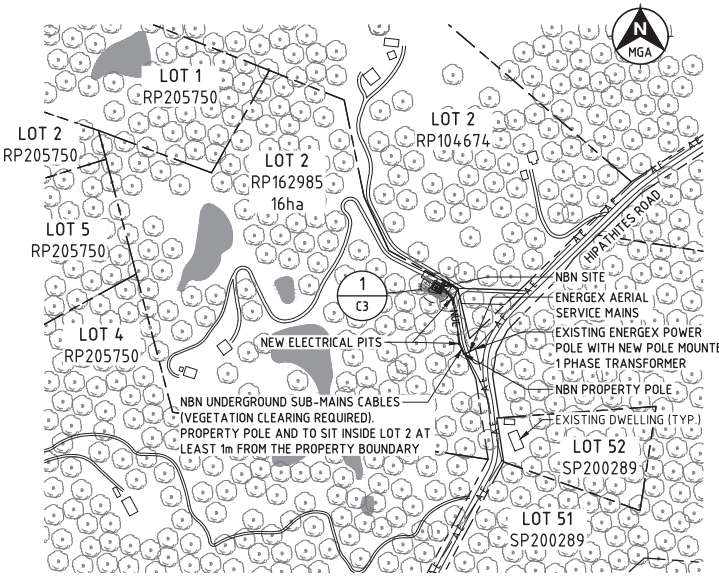


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SITE CO-ORDINATES

MONOPOLE LOCATION

DATUM: MGA (GDA94)	ZONE: 56
LATITUDE	-27.26929°
LONGITUDE	152.83471°
EASTING	483 640
NORTHING	6 983 727



OVERALL SITE PLAN

SCALE 1:5000

LEGEND

- EXISTING AERIAL ELECTRICAL ROUTE
- AERIAL ELECTRICAL ROUTE
- NEW NBN UNDERGROUND ELECTRICAL ROUTE
- PROPERTY BOUNDARY

NOTES:

1. THE POWER ROUTE SHOWN ON THE DRAWINGS IS INDICATIVE ONLY. ELECTRICAL CONTRACTOR TO DETERMINE EXACT ROUTE. ELECTRICAL CONTRACTOR TO LOCATE AND IDENTIFY EXISTING U/G SERVICES PRIOR TO COMMENCEMENT OF WORK.
2. THE ELECTRICAL PITS SHALL BE PROVIDED EVERY 60m run AND EVERY MAJOR CHANGE IN DIRECTION. THE PITS SHALL BE ACO CABLE MATE TYPE 33 PIT 353 x 353 x 744 (D) PITS WITH AS 3996 CLASS B PIT COVER

Client:

Client: ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

FOR CONSTRUCTION

Rev	Date	Revision Details
A	26.04.19	FOR CONSTRUCTION
03	09.01.19	LANDSCAPING UPDATED
02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

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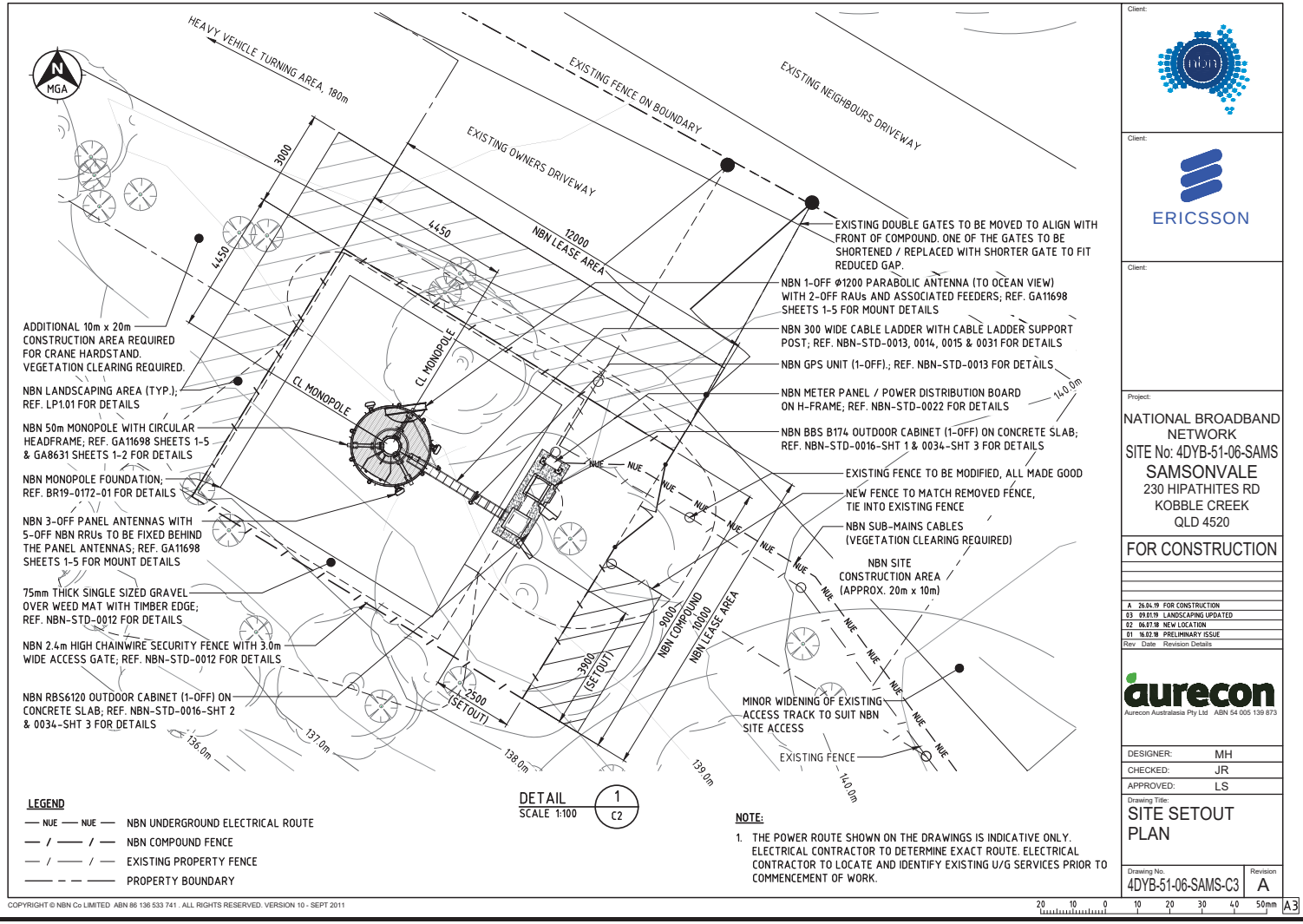
DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

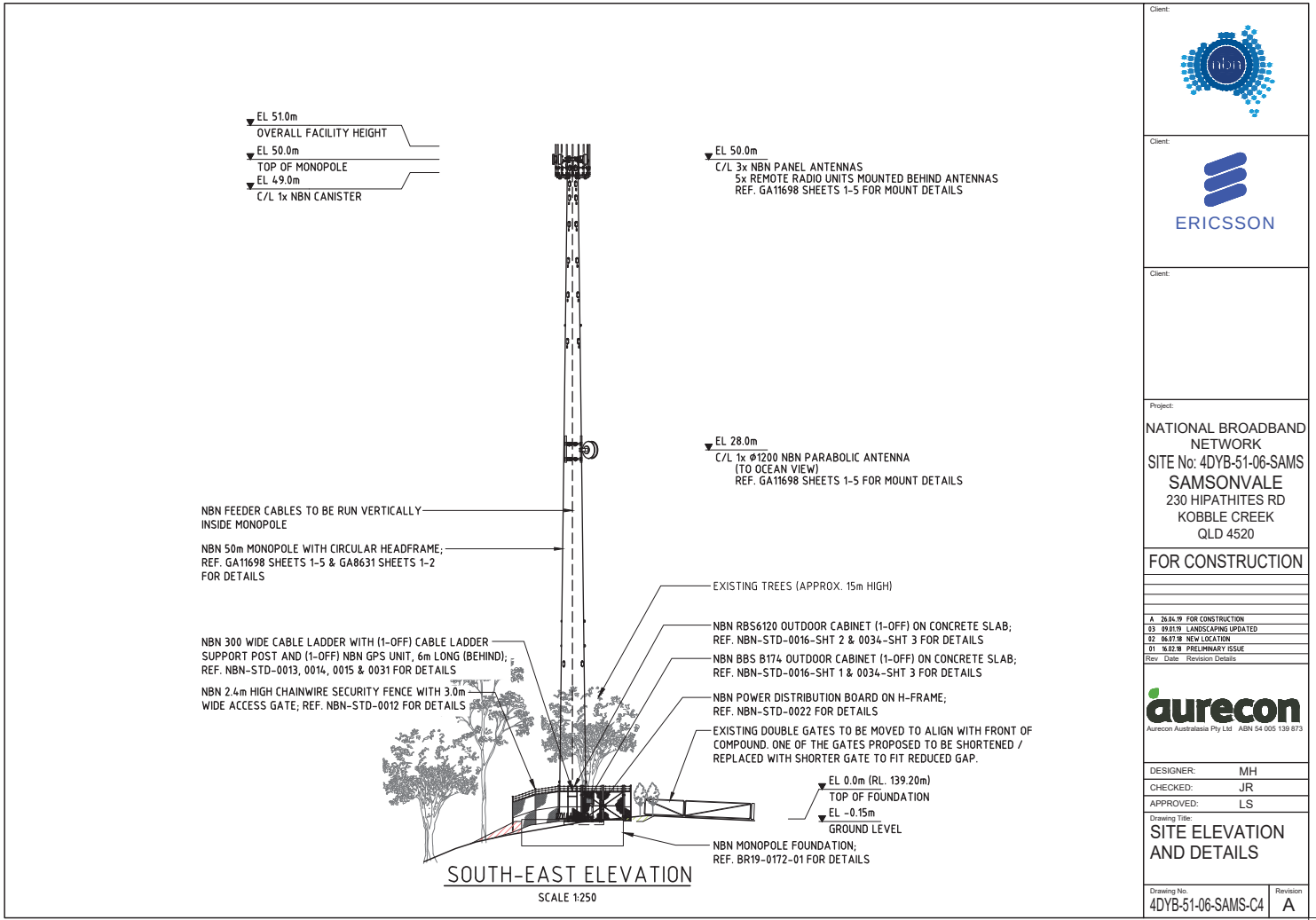
Drawing Title:
OVERALL SITE PLAN

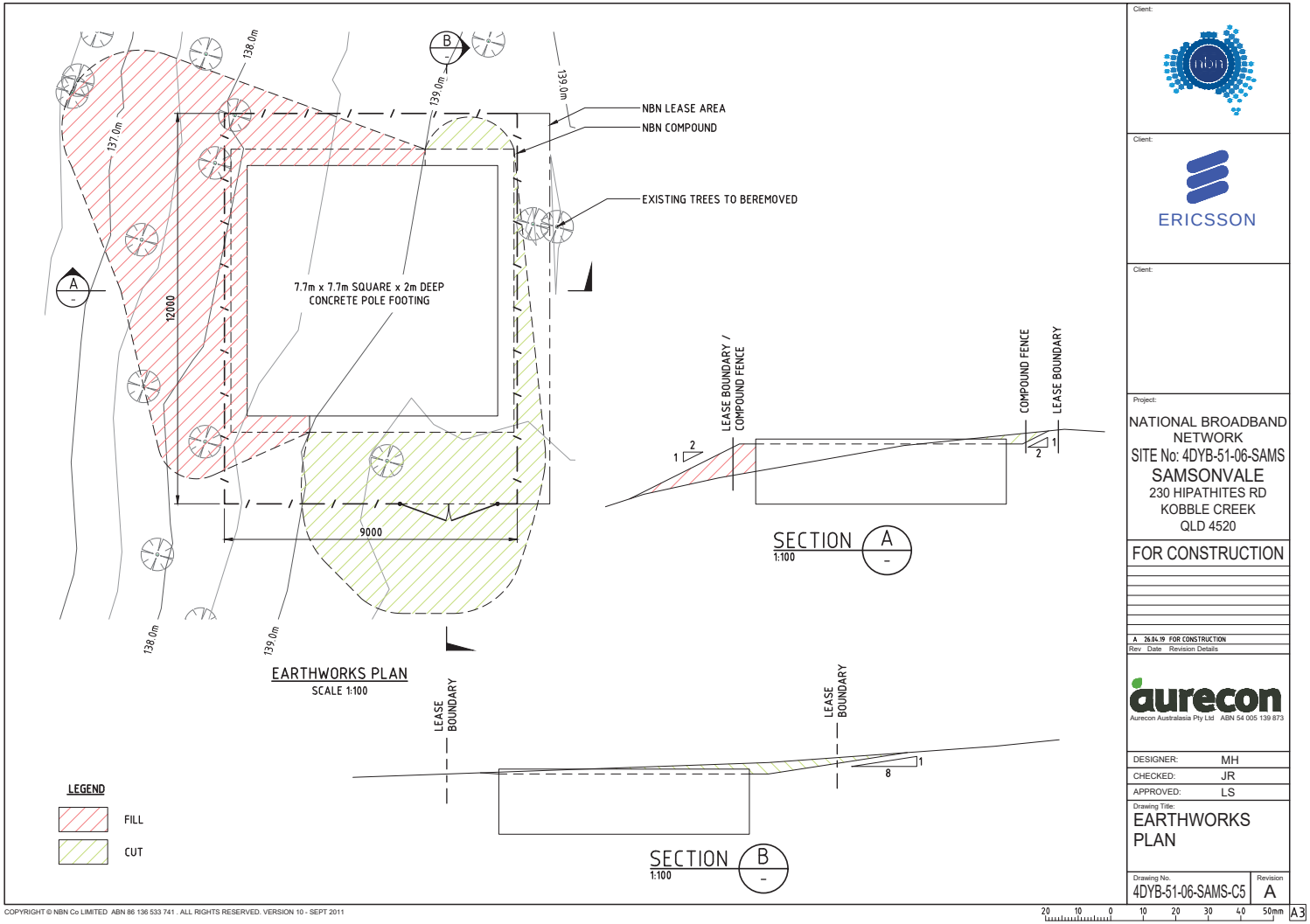
Drawing No.: 4DYB-51-06-SAMS-C2
Revision: A

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20 10 0 10 20 30 40 50mm A3


N
MGA
HEAVY VEHICLE TURNING AREA, 180m
EXISTING FENCE ON BOUNDARY
EXISTING NEIGHBOURS DRIVEWAY
EXISTING OWNERS DRIVEWAY
3000
4450
4450
12000
NBN LEASE AREA
CL MONOPOLE
CL MONOPOLE
ADDITIONAL 10m x 20m CONSTRUCTION AREA REQUIRED FOR CRANE HARDSTAND. VEGETATION CLEARING REQUIRED.
NBN LANDSCAPING AREA (TYP.); REF. LP1.01 FOR DETAILS
NBN 50m MONOPOLE WITH CIRCULAR HEADFRAME; REF. GA11698 SHEETS 1-5 & GA8631 SHEETS 1-2 FOR DETAILS
NBN MONOPOLE FOUNDATION; REF. BR19-0172-01 FOR DETAILS
NBN 3-OFF PANEL ANTENNAS WITH 5-OFF NBN RRUs TO BE FIXED BEHIND THE PANEL ANTENNAS; REF. GA11698 SHEETS 1-5 FOR MOUNT DETAILS
75mm THICK SINGLE SIZED GRAVEL OVER WEED MAT WITH TIMBER EDGE; REF. NBN-STD-0012 FOR DETAILS
NBN 2.4m HIGH CHAINWIRE SECURITY FENCE WITH 3.0m WIDE ACCESS GATE; REF. NBN-STD-0012 FOR DETAILS
NBN RBS6120 OUTDOOR CABINET (1-OFF) ON CONCRETE SLAB; REF. NBN-STD-0016-SHT 2 & 0034-SHT 3 FOR DETAILS
136.0m
137.0m
138.0m
139.0m
EXISTING DOUBLE GATES TO BE MOVED TO ALIGN WITH FRONT OF COMPOUND. ONE OF THE GATES TO BE SHORTENED / REPLACED WITH SHORTER GATE TO FIT REDUCED GAP.
NBN 1-OFF Ø1200 PARABOLIC ANTENNA (TO OCEAN VIEW) WITH 2-OFF RAUs AND ASSOCIATED FEEDERS; REF. GA11698 SHEETS 1-5 FOR MOUNT DETAILS
NBN 300 WIDE CABLE LADDER WITH CABLE LADDER SUPPORT POST; REF. NBN-STD-0013, 0014, 0015 & 0031 FOR DETAILS
NBN GPS UNIT (1-OFF).; REF. NBN-STD-0013 FOR DETAILS
NBN METER PANEL / POWER DISTRIBUTION BOARD ON H-FRAME; REF. NBN-STD-0022 FOR DETAILS
14.0m
NBN BBS B174 OUTDOOR CABINET (1-OFF) ON CONCRETE SLAB; REF. NBN-STD-0016-SHT 1 & 0034-SHT 3 FOR DETAILS
EXISTING FENCE TO BE MODIFIED, ALL MADE GOOD
NEW FENCE TO MATCH REMOVED FENCE, TIE INTO EXISTING FENCE
NBN SUB-MAINS CABLES (VEGETATION CLEARING REQUIRED)
NBN SITE CONSTRUCTION AREA (APPROX. 20m x 10m)
NUE
9000
10000
NBN COMPOUND
NBN LEASE AREA
3900 (SETOUT)
2500 (SETOUT)
MINOR WIDENING OF EXISTING ACCESS TRACK TO SUIT NBN SITE ACCESS
EXISTING FENCE
14.0m
LEGEND
NUE NUE NBN UNDERGROUND ELECTRICAL ROUTE
NBN COMPOUND FENCE
EXISTING PROPERTY FENCE
PROPERTY BOUNDARY
DETAIL 1 C2
SCALE 1:100
NOTE:
1. THE POWER ROUTE SHOWN ON THE DRAWINGS IS INDICATIVE ONLY. ELECTRICAL CONTRACTOR TO DETERMINE EXACT ROUTE. ELECTRICAL CONTRACTOR TO LOCATE AND IDENTIFY EXISTING U/G SERVICES PRIOR TO COMMENCEMENT OF WORK.
Client:
Client:
ERICSSON
Client:
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
FOR CONSTRUCTION
A 26.04.19 FOR CONSTRUCTION
03 09.01.19 LANDSCAPING UPDATED
02 06.07.18 NEW LOCATION
01 16.02.18 PRELIMINARY ISSUE
Rev Date Revision Details
aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873
DESIGNER: MH
CHECKED: JR
APPROVED: LS
Drawing Title:
SITE SETOUT PLAN
Drawing No: 4DYB-51-06-SAMS-C3
Revision A
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20 10 0 10 20 30 40 50mm A3


EL 51.0m
OVERALL FACILITY HEIGHT
EL 50.0m
TOP OF MONOPOLE
EL 49.0m
C/L 1x NBN CANISTER
EL 50.0m
C/L 3x NBN PANEL ANTENNAS
5x REMOTE RADIO UNITS MOUNTED BEHIND ANTENNAS
REF. GA11698 SHEETS 1-5 FOR MOUNT DETAILS
EL 28.0m
C/L 1x Ø1200 NBN PARABOLIC ANTENNA
(TO OCEAN VIEW)
REF. GA11698 SHEETS 1-5 FOR MOUNT DETAILS
NBN FEEDER CABLES TO BE RUN VERTICALLY INSIDE MONOPOLE
NBN 50m MONOPOLE WITH CIRCULAR HEADFRAME; REF. GA11698 SHEETS 1-5 & GA8631 SHEETS 1-2 FOR DETAILS
EXISTING TREES (APPROX. 15m HIGH)
NBN RBS6120 OUTDOOR CABINET (1-OFF) ON CONCRETE SLAB; REF. NBN-STD-0016-SHT 2 & 0034-SHT 3 FOR DETAILS
NBN BBS B174 OUTDOOR CABINET (1-OFF) ON CONCRETE SLAB; REF. NBN-STD-0016-SHT 1 & 0034-SHT 3 FOR DETAILS
NBN 300 WIDE CABLE LADDER WITH (1-OFF) CABLE LADDER SUPPORT POST AND (1-OFF) NBN GPS UNIT, 6m LONG (BEHIND); REF. NBN-STD-0013, 0014, 0015 & 0031 FOR DETAILS
NBN 2.4m HIGH CHAINWIRE SECURITY FENCE WITH 3.0m WIDE ACCESS GATE; REF. NBN-STD-0012 FOR DETAILS
NBN POWER DISTRIBUTION BOARD ON H-FRAME; REF. NBN-STD-0022 FOR DETAILS
EXISTING DOUBLE GATES TO BE MOVED TO ALIGN WITH FRONT OF COMPOUND. ONE OF THE GATES PROPOSED TO BE SHORTENED / REPLACED WITH SHORTER GATE TO FIT REDUCED GAP.
EL 0.0m (RL. 139.20m)
TOP OF FOUNDATION
EL -0.15m
GROUND LEVEL
NBN MONOPOLE FOUNDATION; REF. BR19-0172-01 FOR DETAILS
SOUTH-EAST ELEVATION
SCALE 1:250
Client:
ERICSSON
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
FOR CONSTRUCTION
A 26.04.19 FOR CONSTRUCTION
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01 16.02.18 PRELIMINARY ISSUE
Rev Date Revision Details
aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873
DESIGNER: MH
CHECKED: JR
APPROVED: LS
Drawing Title:
SITE ELEVATION AND DETAILS
Drawing No: 4DYB-51-06-SAMS-C4
Revision A
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20 10 0 10 20 30 40 50mm
A3


138.0m
139.0m
137.0m
NBN LEASE AREA
NBN COMPOUND
EXISTING TREES TO BEREMOVED
7.7m x 7.7m SQUARE x 2m DEEP CONCRETE POLE FOOTING
12000
9000
EARTHWORKS PLAN
SCALE 1:100
LEASE BOUNDARY / COMPOUND FENCE
COMPOUND FENCE
LEASE BOUNDARY
SECTION A 1:100
LEASE BOUNDARY
LEASE BOUNDARY
SECTION B 1:100
LEGEND
FILL
CUT
Client:
ERICSSON
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
FOR CONSTRUCTION
A 26.04.19 FOR CONSTRUCTION
Rev Date Revision Details
aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873
DESIGNER: MH
CHECKED: JR
APPROVED: LS
Drawing Title:
EARTHWORKS PLAN
Drawing No: 4DYB-51-06-SAMS-C5
Revision A
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A3

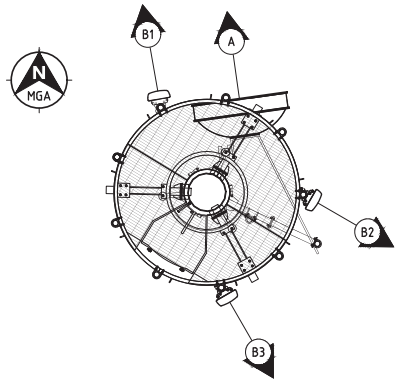
NBN ANTENNA CONFIGURATION – 3400MHz

SECTOR	SYMBOL	PANEL ANTENNA DETAIL								MAIN FEEDER DETAIL					RRU DETAIL					RF TAIL H&S 1/2" BIRD PROOFED LISCA CABLE	RET CABLE 1/TSR 484 21/2000
		TYPE	DIMENSION HxWxD	C/L HEIGHT	AZIMUTH (TN)	P1 & P2 E-TILT	P3 & P4 E-TILT	MECH TILT	ANTENNA ACTION REQ	TYPE	OVERALL LENGTH	CANISTER HEIGHT	CANISTER TO RRU LENGTH	FEEDER ACTION REQ	TYPE	LOCATION	C/L HEIGHT	ANTENNA PORT	RRU ACTION REQ	LENGTH	LENGTH
B1	B1	ARGUS SSPX310R	750x300x115	50m	350°	7°	7°	0°	INSTALL	H&S HYBRID MkII 6x6 (27.5mm)	60m	49m	2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
															RRUS2218	BEHIND	50m	3 & 4	INSTALL	1.5m	
B2	B2	ARGUS SSPX310R	750x300x115	50m	120°	6°	6°	0°	INSTALL				2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
B3	B3	ARGUS SSPX310R	750x300x115	50m	150°	5°	5°	0°	INSTALL				2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
															RRUS2218	BEHIND	50m	3 & 4	INSTALL	1.5m	
B4																					
B5																					
B6																					

NBN TRANSMISSION & GPS ANTENNA CONFIGURATION

ANTENNA	SYMBOL	ANTENNA DETAIL						MAIN FEEDER DETAIL			RAU DETAIL	
		TYPE	DIMENSION	C/L HEIGHT	AZIMUTH (TN)	DESTINATION	ANTENNA ACTION REQ	TYPE	OVERALL LENGTH	FEEDER ACTION REQ	QTY RAU	RAU ACTION REQ
A	A	PARABOLIC	ø1200	28m	352°	OCEAN VIEW	INSTALL	2x LDF1-50	38m	INSTALL	2	INSTALL
B												
GPS		KRE 101 2182/1	ø69x96	2.5m	N/A		INSTALL	LDF1-50	7m	INSTALL		

NOTE:
RRU HEIGHT TO BE +/- 250mm FROM SPECIFIED HEIGHTS. OFFSETS REQUIRED DUE TO MOUNTING ARRANGEMENT BACK TO BACK.



ANTENNA SETOUT PLAN
SCALE 1:50

Client:

Client:
ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

FOR CONSTRUCTION

Rev	Date	Revision Details
A	26.04.19	FOR CONSTRUCTION
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02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

aurecon
Aurecon Australasia Pty Ltd ABN 54 005 139 873

DESIGNER: MH
CHECKED: JR
APPROVED: LS

Drawing Title:
NBN ANTENNA CONFIGURATION & SETOUT PLAN

Drawing No: 4DYB-51-06-SAMS-A1
Revision: A

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20 10 0 10 20 30 40 50mm A3

LANDSCAPE SPECIFICATION NOTES:

EARTH WORKS
CLEARING: Clear areas indicated on the drawings of trees, stumps, shrubs, slab foundations, paving and other surface debris.

EXCAVATION: Excavate or fill areas to dimensions as shown on the drawings. All debris and material not suitable for backfill shall be removed from the site. Ensure caution when excavating near services. Consolidate areas of fill.

TREE PROTECTION:
MARKING: Mark all trees to be retained with a zincanneal tag, painted yellow. Secure the tag to the tree with a loose galvanised steel wire band. At the end of the Contract, the Superintendent will check and remove the tags.

TREE PROTECTION ZONES:Trees to be retained are to be protected within tree protection zones (TPZs) as follows -
- The perimeter of TPZs must be outside the existing canopy of the vegetation or as specified by the Arboricultural Consultant.
- All TPZs are to be fenced with Temporary Fencing Panels (TFP) or Arboricultural Consultant approved alternative.
- No person, vehicles or machinery are to enter the TPZs except with the written consent of Council
- Any underground service installations must be bored and utility authorities must utilise a common trench where possible.
-No fuel, oil dumps or chemicals are allowed to be used or stored within TPZs and the servicing and re-fueling of equipment and vehicles must be carried out away from the root zones.
- No storage of material, equipment or temporary building is to take place within the TPZs.
- Nothing whatsoever is to be attached to any tree including temporary services wires, nails, screws or any other fixing device.
-TPZ fencing is not to be relocated without specific approval from the Consulting Arboriculturist and the Ecologist or Landscape Architect.

EXCAVATION: Do not remove topsoil from within the drip line of trees to be retained unless otherwise specified. If it is necessary to excavate within the drip line, use hand methods such that root systems are preserved intact and undamaged. Open up excavations under tree canopies for as short a period as possible. Do not place spoil from excavations against tree trunks, even for short periods. All care shall be taken to avoid damage to the bark of trees.

TREE ROOT TREATMENT: Do not cut tree roots exceeding 50 mm diameter unless permitted by the Superintendent. Where it is necessary to cut tree roots, use a chain saw or similar means such that the setting does not unduly disturb or rock the remaining root system. Immediately after cutting, apply an approved fungicidal sealant to the cut surface.
BACKFILL to excavation around tree roots with an imported topsoil mixture as specified. Add fertilizer at the rate of 0.9kg/m3 as specified in PLANTING. Place the backfill in layers not exceeding 150 mm maximum depth, solidly compacted to eliminate voids. Do not backfill around tree trunk to a height greater than 150 mm above the original ground surface.

WATERING: Immediately after backfilling, thoroughly water the root zone surrounding the tree.

DECOMPACTION: If the ground under the tree canopies has been unduly compacted during the work under the Contract, for example by the operations of heavy constructional plant, loosen the soil to a depth of 150 mm.

STOCKPILES: Do not stockpile materials near trees to be retained.

RETAINED TREES Where pruning of retained trees is required it is to be undertaken in accordance with AS4373/96 and the "three-cut" method is to be utilised.

DAMAGE TO EXISTING TREES: Should any tree be damaged during the work under the Contract, and if the Superintendent permits repair work to be done, such repair work should be performed by an approved tree surgeon at no extra cost.

REMOVAL: If repair work is considered impracticable, or is attempted and fails, if so directed, remove the tree and root system, make good as necessary, and either replace the tree or pay damages, as determined by the Superintendent.

REPLACEMENT: Provide, plant and establish as part of the works, at no extra cost to the Principal, a replacement tree of the same species and similar size or as approved by the Superintendent.

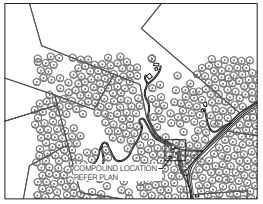
DAMAGE ASSESSMENT: If replacement as part of the works is not approved, pay for any tree removed pursuant to the above, damages assessed by the Superintendent as the cost of replacement by others or to a maximum cost of $3,000 unless otherwise specified.

CULTIVATION Cultivate all new planting areas to a minimum depth of 200mm.

TOPSOIL & MULCHING
TOPSOILING
TYPE : Imported topsoil from an approved supplier to AS 4419 2003. Ensure soil is free of stones, weeds, sticks, roots and other deleterious material toxic to plant growth.
DEPTH
Planting areas: 300mm

SPREADING:Spread topsoil to the depths indicated and lightly compact so that the surface is smooth, free from hollows and has even grade falls. Spread the soil flush with any abutting surfaces generally, but allow for the depth of mulch as necessary.

MULCHING
Mulch from an approved supplier to AS 4454 2003
Place a 1m dia. mulch ring to each plant at time of planting.
TYPE: Forest Litter mulch to a depth of 75mm to each tree indicated on the drawings. Pull mulch away from stem of plants. The mulch must be free from soil, weed growth and other deleterious material harmful to the plants and finished 25mm below the final surface levels of adjacent surfaces.



LOCATION PLAN
N.T.S

PLANTING
PLANT MATERIAL: Only use vigorous, well established plants of local provenance with large healthy root systems that show no evidence of having been restricted or damaged. Plants must be free from any pests and disease, well hardened off and of a good form consistent with their species or variety.

PLANT SIZES: Where a minimum plant height is specified in the 'PLANT SCHEDULE' the height shall be the vertical distance between the top of the pot and the natural top of the plant whilst standing vertically in the pot.

SUBSTITUTIONS: Make no substitutions unless provided in writing. Substitutions will not be approved if plants have not been made available for inspection at the Nursery within 30 days of the Contract being awarded.

REPLACEMENTS: Replace, with plants of the same specified type, quality and size, any plants which fail or are damaged during the work under the Contract.

WARRANTY: Furnish a warranty from the supplier attesting that the plants are true to the specified species and type, and free from diseases, pests, weeds and the like.

STORAGE: Wherever possible, plants shall be planted immediately after delivery to the site. If this is not possible, keep them in good condition by appropriate storage methods, or as may be directed. Prevent theft, drying out or damage from any cause including frost, wind, sun, vermin, animals and the like. Provide an on, site nursery for holding plant stock on site for more than 48 hours, of sufficient size, with provision for watering.

POTTING ON: If directed, pot plants into larger soil-filled containers to prevent them becoming root bound if there is an unforeseen delay. The Contractor shall bear the cost of potting on. Do not carry out potting on unless authorised.

POT SIZES: Supply plants in weed-free containers of the sizes specified in the 'PLANT SCHEDULE' shown on the drawings.

PLANT TYPES: Refer Plant Schedule.

PLANTING: Water the plant and the planting areas thoroughly before planting begins. The planting holes should be large enough to allow the placement of the plant without damaging its root system. Remove plants carefully from container ensuring minimum soil loss and root disturbance. Root prune any root bound plants. Place plants centrally in their holes and so that the top of the soil level in the pot is 20mm below the finished surrounding soil level. Fertilize with a slow release tablet form of fertilizer. Backfill all holes using imported topsoil as specified. Water plants thoroughly.

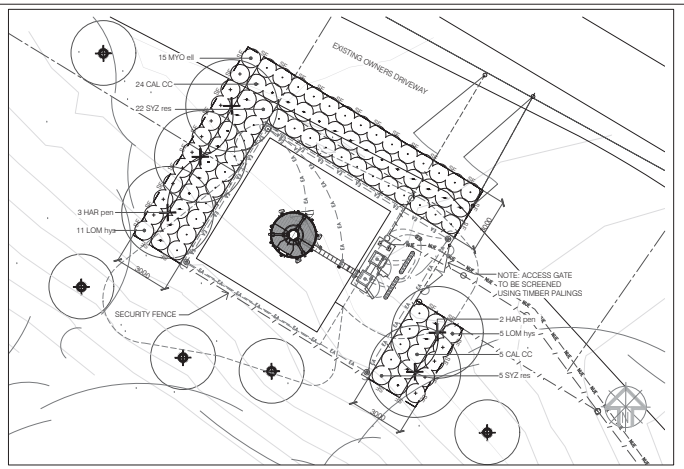
Tree Planting & Staking: Refer DETAIL LD01.

SPADE EDGE:
To each individual planting, provide a Spade Cut Edge to the perimeter of the mulch ring as per DETAIL LD02.

ESTABLISHMENT & MAINTENANCE
General
Landscaped areas shall be maintained by the Contractor from the time of installation until the end of the Landscape Establishment Period. The Landscape Establishment Period shall be 12 weeks. Maintenance shall include watering, fertilizing, mowing, weeding, pruning, pest and disease management, plant replacement, site drainage and general tidying of the treated areas.

Watering
Watering shall be carried out at sufficient frequency to ensure establishment of the plants and to achieve the specified acceptance criteria. Notwithstanding this requirement, watering shall be carried out at the minimum frequency stated in below. The stated rate of watering shall include any rainfall.

Watering of plants shall be directed at the base of the plant to thoroughly water the root ball.
Watering shall not cause erosion or displacement of treated areas.
No water shall be allowed to spray onto, flow across or pond on paved areas including roadways, bikeways and footpaths.



PLAN
SCALE 1:100 @A1

Pest and Disease Management
Plants shall be monitored for pest and disease incidence on a weekly basis. Acceptable plant protection techniques shall be employed to manage any infestations.

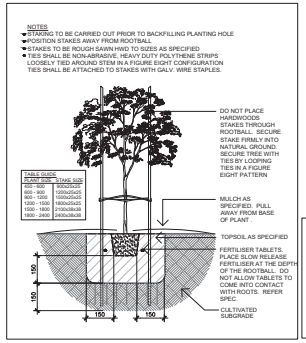
Site Drainage
All landscape areas shall be maintained with sound drainage principles and the avoidance of runoff from the Site shall be enforced. Each irrigation of the Site shall be over a period of time that allows water infiltration (percolation) via the soil and does not produce run-off water.

Tidying
All landscaped areas shall be kept in a neat and tidy condition during the Landscape Establishment Period.
Tidying shall include but not be limited to: the collection and removal of litter, plant prunings and dead plants; removal of mulch from roads and pathways; checking and adjusting plant support stakes and ties; and making good any disturbance to the surface of mulches.

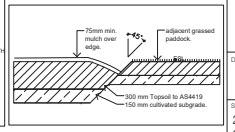
Plant Replacement
Replace at no extra cost, any plant which dies from the cause whatsoever during the Establishment period. Plant replacements shall be of the same size and species and equal to size and similar plants at the time of death.

PLANT SCHEDULE

CODE	BOTANICAL NAME	NO.	SIZE	HEIGHT	SPREAD	STAKING / GUYING
CAL CC	CALLISTEMON 'Captain Cook'	29	200mm	500mm	-	-
HAR pen	HARPULLIA pendula	5	25Li	1200mm	700mm	s
LOM hys	LOMANRA hystrix	16	140mm	300mm	-	-
MYO ell	MYOPORUM ellipticum	15	140mm	-	250mm	-
SYZ Res	SYZYGIUM Resilience	27	200mm	400mm	-	-



DETAIL LD01 TREE PLANTING & STAKING
Scale NTS



DETAIL LD02 SPADE CUT EDGE
Scale 1:20 @ A1; 1:40 @ A3

0 1 2 3 4 5 6 7 8 9 10 [m]
SCALE 1:100 @ A1

LEGEND
- EXISTING TREE TO BE RETAINED
- TREES As Spec.
- SPADE EDGE AS SPEC.
- PLANTING AS SPEC.

ISSUE	DATE	AMENDMENT
C	13.05.2019	APPROVAL
B	13.03.2019	APPROVAL
A	27.02.2019	APPROVAL

FIGURED DIMENSIONS TAKE PREFERENCE TO SCALE.
VERIFY AND CHECK ALL DIMENSIONS ON SITE.
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West End QLD 4101
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CLIENT:
NBN Co. Ltd.

PROJECT:
NATIONAL BROADBAND NETWORK SAMSONVALE

DRAWING:
LANDSCAPE PLAN

SITE:
230 HIPATHITES RD KOBBLE CREEK QLD 4520

DATE: MAY 2019
SCALE: AS SHOWN
DRAWN: ww
APPROVED: JF
PROJECT NO: 2019.011
DWG NO: LP1.01
ISSUE: C

Document prepared by

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Bringing ideas to life

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National Broadband Network Fixed Wireless Project

4DYB-51-06-SAMS-Samsonvale Landslide Risk Assessment Report

Ericsson Australia Pty Ltd

2019-03-14

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Bringing ideas to life

Document control record

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Client	Ericsson Australia Pty Ltd					
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Current revision	**0**					

Approval			
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1 Introduction

Aurecon Australia Pty Ltd was commissioned by Ericsson Australia Pty Ltd to undertake a Landslide Risk Assessment for the mobile network site at Samsonvale, at Kobble Creek, Queensland 4520 (4DYB-51-06-SAMS) as part of the National Broadband Network Fixed Wireless project.

The site was identified on the Morton Bay Regional Council Planning Scheme, Landslide Hazard – Overlay Map as a location of concern based on a site slope angle of 15% (or more). Therefore, an assessment was required to determine the landslide risks and potential mitigation measures (if applicable) as per the Moreton Bay Regional Council's Planning Scheme Policy, Landslide Hazard (2015)

It is understood that the following structures are proposed at the site based on the preliminary drawings provided (refer Appendix A):

- 50 m monopole
- Outdoor cabinet on concrete slab on ground
- Access track works to facilitate construction and allow access for maintenance in the future

This report summarizes the findings of a landslide risk assessment carried out for the site considering the development referenced above.

2 Scope of Assessment

The scope of the assessment presented in this report is limited to a landslide risk assessment for the proposed works and its potential impact on surrounding infrastructure. This is to satisfy the requirements of Moreton Bay Regional Council's Planning Scheme Policy, Landslide Hazard (2015).

The assessment was carried out in accordance with Australian Geomechanics Society, Practice Note Guidelines for Landslide Risk Management (AGS 2007). It includes recommendations on additional works that, where deemed necessary, should be included as part of the development to mitigate the landslide risk at the site.

The assessment does not include assessment of other aspects such as footing capacity (geotechnical or structural), retaining wall stability or site erosion characteristics unless they relate to the landslide risk.

3 Methodology

The landslide risk assessment was carried out in accordance with AGS, Practice Note Guidelines for Landslide Risk Management (AGS 2007).

The assessment was carried out using the "Degree of Belief" methodology based on qualitative terminology due to the lack of quantitative data available. A qualitative approach was also deemed appropriate as the structure was not deemed to be of a high importance level and was also at a reasonable offset from existing infrastructure.

4 Information Used in Assessment

The following information was used in the assessment:

- Drawings 4DBY-51-06-SAMS- (refer to Appendix A)
- 4DBY-51-06-SAMS – Samsonvale - Geotechnical Investigation Report (Rev 0, 21/01/2019) (Aurecon 2019) (refer to Appendix B)
- Aerial photography available via QLD Globe
- Site inspection/mapping was carried out on the 07/03/2019 by a suitably qualified geotechnical engineer (mapping results are included in Appendix C)

No historical information describing or categorising past landslides at the site was made available at the time of this assessment. It should be noted that according to the Moreton Bay Regional Council's Planning Scheme Policy, Landslide Hazard (2015) (Section 1.1 and 2) that a site is classified as a "Landslide Hazard Area" when the land has a slope of 15% (1V:6.6H) or greater. Therefore, the site doesn't necessarily have a history of landslides if it has been identified as a "Landslide Hazard Area".

5 Site Characterization

5.1 Desktop Study

5.1.1 General Site Description

The proposed site is located on a private property with residential address 230 Hipathites Rd, Kobble Creek, QLD 4520.

The property is located approximately 10km south of the Dayboro Township. The surrounding region predominantly consists of farmland and densely vegetated forests. The regional topography is typically hilly terrain.

The proposed NBN lease area is situated just off to the side of a private road on the crest of a hill, sloping down towards the south-west at an average gradient of around 15%, becoming slightly steeper downhill away from the lease. Rock outcrops along parts of the road and rock was also observed in road cuttings and clearings with limited vegetation cover within 10m of the borehole location. The rock was observed as being a phyllite. At the time of the geotechnical investigation, the site was covered with short to tall grass, small to large shrubs, and small to tall trees up to approximately 30m in height.

Trafficability across the site was found to be sufficient for light vehicles (4WD) and the track mounted drilling rig at the time of the investigation. Caution should be taken when considering access for heavy machinery, particularly after rainfall.

Site photographs of key features at around the site are included in Appendix C.

5.1.2 Geological Setting

The 1:100,000 scale geology map of the site (Department of Mines and Energy website, www.minesonline.buisness.qld.gov.au) indicates that the site is underlain by the Bunya Phyllite Formation of Devonian - Carboniferous age. The Bunya Phyllite formation typically consists of slate, phyllite, arenite and metabasalt.



Map Symbol	Rock Unit Name	Age	Lithological Summary
Qa	Qa-Qld	Quaternary	Clay, silt, sand and gravel; flood-plain alluvium
	Mount Samson Granodiorite	Late Triassic	Granodiorite, diorite, gabbro, granite, microgranite
	Bunya Phyllite	Devonian – Carboniferous	Slate, phyllite, arenite, metabasalt

Figure 1: 1:100,00 Detailed Surface Geology Map Extract (Department of Mines and Resources)



Figure 2: Site photograph showing view of lease area, facing north west



Figure 3: Location of where the geotechnical boreholes was drilled, facing south west and showing depicting road and fence

5.2 Existing Geotechnical Investigation Data

An investigation was carried out by Aurecon on the 21/01/19 to inform the design of the monopole footing and outdoor cabinet on concrete slab on ground located within the main lease area. This consisted of borehole drilling and resistivity testing.

The site investigation found that the subsurface profile at the Samsonvale site comprised residual regolith and soil (phyllite) described as gravelly clayey sand from surface, grading into weathered PHYLLITE bedrock at approximately 3.6m bgl. The upper bedrock formation was typically extremely weathered to highly weathered, with very low strength, becoming typically slightly weathered with high strength below 6.5m to the depth of investigation (9.0m). It is noted that the bedrock was variable, with weathered zones and significant core loss observed.

Groundwater seepage was not observed during the investigation.

The results of the borehole investigation are summarized in Table 1. The location of the geotechnical investigation is within the main lease area and is shown in plans in Appendix B as part of the original geotechnical investigation report which includes more details.

Table 1: Summary of borehole investigation

Origin	Material	Depth (m) bgl		Consistency / Strength [1]	SPT 'N' (blows)
		From	To		
Residual	Gravelly Clayey SAND	0.0	3.6	Very Dense	N* = 100 @ 0.5m N* = 80 @ 2.0m N* = 45 @ 3.5m
Bedrock	PHYLLITE	3.6	6.5	Very Low to Low Strength	-
		6.5	9.0 (TD)	High Strength	-

Notes: TD – Termination Depth; **N*** - Extrapolated SPT N value, [1]: Where no in situ testing available for granular material, the strength has been inferred from engineering judgement.

5.3 Site Inspection

A site inspection was carried out by Aurecon on the 07/03/19 as part of the landslide risk assessment. This consisted of a walk-over of the site to map the key features (e.g. geology, existing features, surface hydraulics) that could be observed at surface. Weather conditions during the inspection was cloudy but warm with no rain and no wind. The results of this mapping are summarized below and presented in Appendix C.

5.3.1 Typical Topography

The regional topography is typically hilly terrain, with the proposed NBN lease area situated just off to the side of a private road on the crest of a slope which slopesdown toward the south-west at an average gradient of 50%.

The topography within the main lease area is slightly hummocky with a small fall downslope to the south. The slope then increases away from the lease area starting at an initial~15° slope angle that steepens to ~25° (approximately 1:2 to 1:3, V:H).

5.3.2 Inferred Subsurface Conditions

Prevailing ground conditions were observed to consist of regolith and residual soil (phyllite) that was a gravelly clayey sand from the surface, grading into weathered PHYLLITE bedrock at approximately 3.6m bgl (BH SAM-01).

Exposed weathered phyllite outcrops was observed along within the road cuttings, within the private road surface and downslope of the lease area in the incised gully. No evidence of rock defect controlled stability was observed at the site during the inspection and no signs of previous failure (tension cracks, previous slips, etc.) were observed. Washout gullies were observed downslopes, where regolith had been washed away. These may have formed from a depression in the slope caused by fallen trees.

5.3.3 Vegetation Characteristics

The main lease area is vegetated, with the vegetation characterised predominantly by a high tree density. Straight-standing gumtrees and eucalypts measuring approximately 15m to 30m high populate the vicinity of the lease area. Some fallen trees and branches were observed, which may be the result of lightning strikes. Tree regrowth measured 10m high. A very large, mature tree was observed near the siteof the proposed monopole. Several trees were marked with ribbons, presumably identified for removal.

Refer to Appendix C.

5.3.4 Surface Drainage Characteristics

The site walkover found drainage to be a key issue for the site. A rock outcrop was discovered in a large gully down the slope, as well as an area of deep scouring within the slope. The site is located up the road and on the right of a drainage feature that subject to visibly deep scouring down the middle. As the scour within the slope measures approximately 0.75m in depth, it could potentially affect the drainage of the lease area.

A hole measuring 1m wide and 0.7m deep was found in the slope, approximately 25 m from the lease area. The hole may have likely been caused by the displaced tree trunk of a fallen tree. Rainwater may collect in these holes left behind by the fallen trees, thus it is imperative that appropriate control measures are put in place to manage drainage in this site, and to keep the slope dry.

The thick layer of colluvial, regolith debris on the slope may further add to the site's drainage issues, due to the generally sodic and highly dispersive nature of high sediment delivery and low coherence soil regoliths that lack coherence especially when wet.

Refer to Appendix C.

5.3.5 Surrounding Infrastructure/Property

Infrastructure/property surrounding the development is not extensive. The site is on a private property located approximately 10km south of the Dayboro Township, with the proposed NBN lease area situated just off to the side of a private road on the crest of a hill.

Dial Before You Dig plans did not indicate the presence of underground services within the general vicinity of the subject NBN site. Overhead powerlines exist along the existing road to the property, and height clearance should be ensured for construction plant and equipment.

The impact of the proposed works on this infrastructure is nil to negligible.

Refer to Appendix C.

6 Landslide Risk Assessment

6.1 Overview

The landslide risk assessment was carried out in accordance with AGS, Practice Note Guidelines for Landslide Risk Management (AGS 2007).

The assessment was carried out using the “Degree of Belief” methodology based on qualitative terminology due to the lack of quantitative data available. A qualitative approach was also deemed appropriate as the structure was not deemed to be of a high importance level and was at also at reasonable offset from existing infrastructure

6.1.1 Key Assumptions

Key assumptions are described below; reference should also be made to the scope in Section 2.

- This assessment is based on the development drawings provided to date (refer to Appendix A)
- A design life of 50 years for the development was assumed
- The qualitative descriptors for “Importance Level of Structure”, “Likelihood”, “Consequence”, and “Risk” provided in the AGS, Practice Note Guidelines (2007) are assumed to be acceptable for this assessment (refer to Appendix D)
- A “Tolerable Risk Level” of “Low” was assumed to be acceptable for the works
- No information was provided which indicates significant development immediately surrounding the site

6.2 Key Site Features Considered & Control Measures

Based on the proposed development and the site mapping the following key feature were assessed:

- Feature A (Main Lease Area) – Main lease area, monopole, outdoor cabinets

6.3 Assessed Landslide Risk Level

The assessed landslide risk levels for Feature A is summarised in Table 2. These risk levels were based on the qualitative risk classifications presented in AGS, Practice Note Guidelines (2007) and included in Appendix D.

The results of the assessment indicate the following:

Features A (Main Lease Area) – A “Low” risk rating was determined for the main lease area. This was based on borehole investigations and site mapping/inspections which indicated prevailing shallow bedrock and no evidence of a history of landslides or slope failures (of significant magnitude) at the site.

Table 2: Summary of landslide risk assessment

Feature	Likelihood	Consequence	Risk Rating	Comment
A – Main Lease Area	D – Unlikely	4 – Minor	L – Low	Care should be taken to ensure storm water is appropriately managed to reduce soil erosion on the western slope

Notes: a. Refer Section 6.2 for description of features

7 Conclusions and Recommended Controls

A landslide risk assessment was carried out as per the Moreton Bay Regional Council’s Planning Scheme Policy, Landslide Hazard (2015) for the proposed mobile network site at Samsonvale, at Kobble Creek, Queensland 4520 (4DYB-51-06-SAMS). This was in accordance with the AGS, Practice Note Guidelines for Landslide Risk Management (AGS 2007) and based on the development drawings appended to this report.

The landslide risk ratings and proposed controls from this process are summarised below.

7.1 Landslide Risk Rating

The following risk ratings were determined for key features related to the development based on the AGS, Practice note Guidelines (2007) presented in Appendix D.

- Main Lease Area, Monopole and Cabinet Footing – A “Low” risk rating was determined for the main lease area. This was based on borehole investigations and site mapping/inspections which indicated prevailing shallow bedrock and no evidence of a history of landslides or slope failures (of significant magnitude) at the site.

7.2 Controls to Reduce Landside Risk

As per the project drawings, (4DBY-51-06-SAMS-; refer Appendix A), the project works are required to comply with all relevant NBN construction standards, current Australian standards and specifications. These controls were deemed to be adequate and no further controls are recommended as the landslide risk rating was determined to be “Low” for the project works described.

Given that the monopole will constructed near the crest of the slope, the designer should account for sloping ground when assessing the geotechnical capacity of the pile.

Care should be taken to control stormwater drainage away from the site as the field inspection recorded localised washouts of the soil and regolith mantling the slope, which indicates the surface soils are susceptible to erosion. However, small locailsed erosion of the surface soils should not imact the stability fo the proposed monopole.

8 References

- AGS 2007, Practice Note Guidelines for Landslide Risk Management, Australian Geomechanics Society (AGS), Vol 42, No 1.
- Aurecon 2018, 4DYB-51-06-SAMS-Samsonvale – Geotechnical Investigation Report, Ericsson Australia Pty Ltd.
- Moreton Bay Regional Council 2015, Planning Scheme Policy – Landslide Hazard

9 Limitations

This report has been prepared for the use of the client, Ericsson Australia Pty Ltd. This report has not been prepared for use by parties other than the client, and the client's respective consulting advisors. The landslide risk assessment has been based on experience and understanding of the geotechnical processes relevant to the site, bearing in mind the practical limitations of acquiring information including the frequency of inspections, cost and time constraints. Should conditions exposed at the site vary significantly from the interpretation provided in this report during construction works, or the works themselves vary significantly from those considered in this report it is requested that Aurecon be informed and have the opportunity to review any of the findings of this report.

This report has been written with the express intent of providing sufficient information for assessing the landslide risk at the site. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual and perform any additional tests as necessary for their own purposes.

It is strongly recommended that any plans and specifications prepared by others and relating to the content of this report or amendments to the original plans and specifications be reviewed by Aurecon to verify that the intent of our recommendations is properly reflected in the design.

There are always some variations in subsurface conditions across a site that cannot be defined even by exhaustive investigation. Hence, it is possible that the measurements and values obtained from sampling, testing and site mapping may not represent the extremes of conditions which exist within the site.

Further conditions may change at the site over time, including subsurface conditions, groundwater levels, vegetation coverage or surrounding development/infrastructure. This should be borne in mind, particularly if the report is used after a protracted delay.

Appendix A
Site Plans and Development Drawings

Table A3: List of Development Drawings

Drawing Number	Title	Revision	Date
4DYB-51-06-SAMS-T1	Cover Sheet	02	06/07/2018
4DYB-51-06-SAMS-C1	Site Specific Notes	02	06/07/2018
4DYB-51-06-SAMS-C2	Overall Site Plan	02	06/07/2018
4DYB-51-06-SAMS-C3	Site Setout Plan	02	06/07/2018
4DYB-51-06-SAMS-C4	Site Elevation and Details	02	06/07/2018
4DYB-51-06-SAMS-A1	NBN Antenna Configuration & Setout Plan	02	06/07/2018

		16.02.18	06.07.18				
DATE OF ISSUE							
DRAWING PACKAGE VERSION		1	2				
GENERAL							
4DYB-51-06-SAMS-T1	COVER SHEET	01	02				
4DYB-51-06-SAMS-C1	SITE SPECIFIC NOTES	01	02				
4DYB-51-06-SAMS-C2	OVERALL SITE PLAN	01	02				
4DYB-51-06-SAMS-C3	SITE SETOUT PLAN	01	02				
4DYB-51-06-SAMS-C4	SITE ELEVATION AND DETAILS	01	02				
ELECTRICAL							
RF AND TX CONFIGURATIONS							
4DYB-51-06-SAMS-A1	NBN ANTENNA CONFIGURATION & SETOUT PLAN	01	02				
STRUCTURAL							
CIVIL							
MONOPOLE DOCUMENTATION							
LEASE							
DISTRIBUTION							
ERICSSON	KATE DOUGHAN	1	1				
AURECON	LISA SHIELDS	1	1				

SITE No: 4DYB-51-06-SAMS
SAMSONVALE

230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

RFNSA No.: 4520024

Australia's broadband network

PROJECT SUMMARY

PROPOSED NBN GREENFIELD 50m MONOPOLE
PROPOSED NBN OUTDOOR CABINETS ON CONCRETE SLAB ON THE GROUND

Client: nbn

Client: ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

PRELIMINARY

Rev	Date	Revision Details
02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

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Aurecon Australia Pty Ltd ABN 54 005 139 873

DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

Drawing Title: COVER SHEET

Drawing No.: 4DYB-51-06-SAMS-T1
Revision: 02

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20 10 0 10 20 30 40 50mm A3

SITE INFORMATION:

1. SITE ADDRESS
LOT 2 ON RP162985, 230 HIPATHITES RD, KOBBLE CREEK, QLD 4520.

2. GENERAL
THE CONTRACTOR SHALL COMPLY WITH ALL RELEVANT NBN CONSTRUCTION STANDARDS, CURRENT AUSTRALIAN STANDARDS AND SPECIFICATIONS.

3. SITE ACCESS
PROPOSED ACCESS FROM EXISTING DRIVEWAY OFF HIPATHITES ROAD.

4. EQUIPMENT
PROPOSED NBN OUTDOOR CABINETS TO BE INSTALLED ON CONCRETE SLAB (<7.5m^2 GFA) WITHIN NBN LEASE AREA.

5. STRUCTURE
PROPOSED NBN 50m MONOPOLE.

6. ANTENNA ACCESS
ANTENNAS ARE PROPOSED TO BE ACCESSED USING ACCESS LADDER WITH LAD-SAF OR EWP, BY RIGGER QUALIFIED PERSONNEL ONLY.

7. EXISTING SERVICES
THE CONTRACTOR SHALL IDENTIFY AND CONFIRM THE LOCATION OF ALL EXISTING SERVICES AS REQUIRED PRIOR TO COMMENCEMENT OF WORKS.

8. EXISTING SITE HAZARDS
THE FOLLOWING HAZARDS ARE PRESENT ON THIS SITE:
- WORK IN REMOTE AREA
- STEEP SLOPE AT REAR OF SITE
- DENSE VEGETATION

9. ELECTRICAL SUPPLY
REFER TO DRAWINGS 4DYB-51-06-SAMS-C2 & C3 FOR DETAILS. CONDITIONS OF SUPPLY SUBJECT TO ENERGEX OFFER.

10. TRANSMISSION LINK & RF CONFIGURATION
REFER TO TABLE ON DRAWING 4DYB-51-06-SAMS-A1.

11. SITE SPECIFIC INFORMATION
- NO RETAINING WALLS ARE PROPOSED
- NO STORMWATER DETENTION IS REQUIRED
- VEGETATION CLEARING IS REQUIRED FOR COMPOUND AND CONSTRUCTION AREA
- NO EASEMENTS ARE EXISTING OR PROPOSED OVER SITE LOT

12. DIAL BEFORE YOU DIG
DBYD JOB NUMBER - 14473718
ENQUIRY DATE: 27/06/2018
CONTRACTOR SHALL REVALIDATE AND VERIFY AT THE TIME OF CONSTRUCTION.

Client:

Client:
ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

PRELIMINARY

Rev	Date	Revision Details
02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

aurecon
Aurecon Australia Pty Ltd ABN 54 005 139 873

DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

Drawing Title:
SITE SPECIFIC NOTES

Drawing No.	Revision
4DYB-51-06-SAMS-C1	02

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20 10 0 10 20 30 40 50mm A3

SITE LOCATION

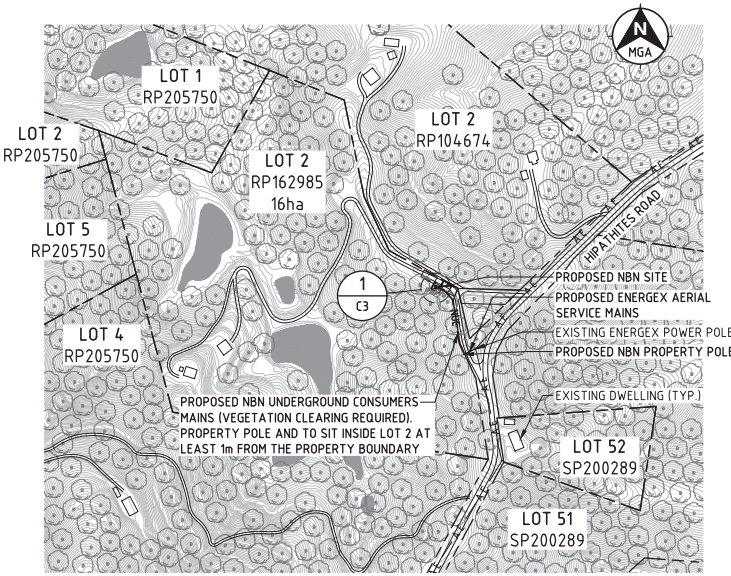


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SITE CO-ORDINATES

MONOPOLE LOCATION

DATUM: MGA (GDA94)	ZONE: 56
LATITUDE	-27.26923°
LONGITUDE	152.83476°
EASTING	483 644
NORTHING	6 983 733



OVERALL SITE PLAN

SCALE 1:5000

LEGEND

- EXISTING AERIAL ELECTRICAL ROUTE
- PROPOSED AERIAL ELECTRICAL ROUTE
- PROPOSED NBN UNDERGROUND ELECTRICAL ROUTE
- PROPERTY BOUNDARY

NOTES:

1. THE POWER ROUTE SHOWN ON THE DRAWINGS IS INDICATIVE ONLY. ELECTRICAL CONTRACTOR TO DETERMINE EXACT ROUTE. ELECTRICAL CONTRACTOR TO LOCATE AND IDENTIFY EXISTING U/G SERVICES PRIOR TO COMMENCEMENT OF WORK.
2. ENERGEX MAY REJECT NEW SERVICE MAIN FOR NBN AND MAY REQUIRE NBN TO UTILISE EXISTING POINT OF SUPPLY AT EXISTING HOUSE (TBC)

Client:

Client: ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

PRELIMINARY

Rev	Date	Revision Details
02	06.07.18	NEW LOCATION
01	16.02.18	PRELIMINARY ISSUE

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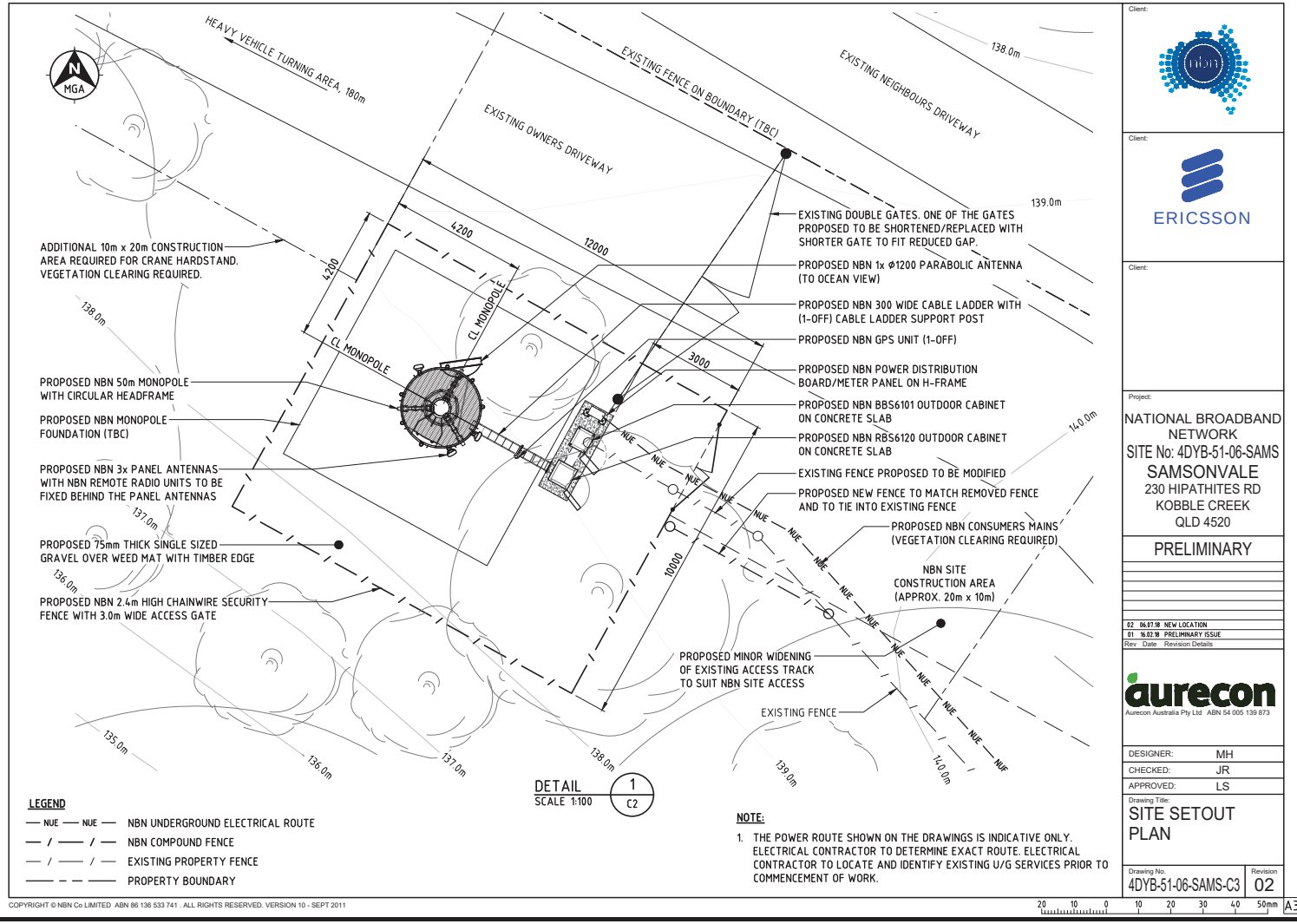
DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

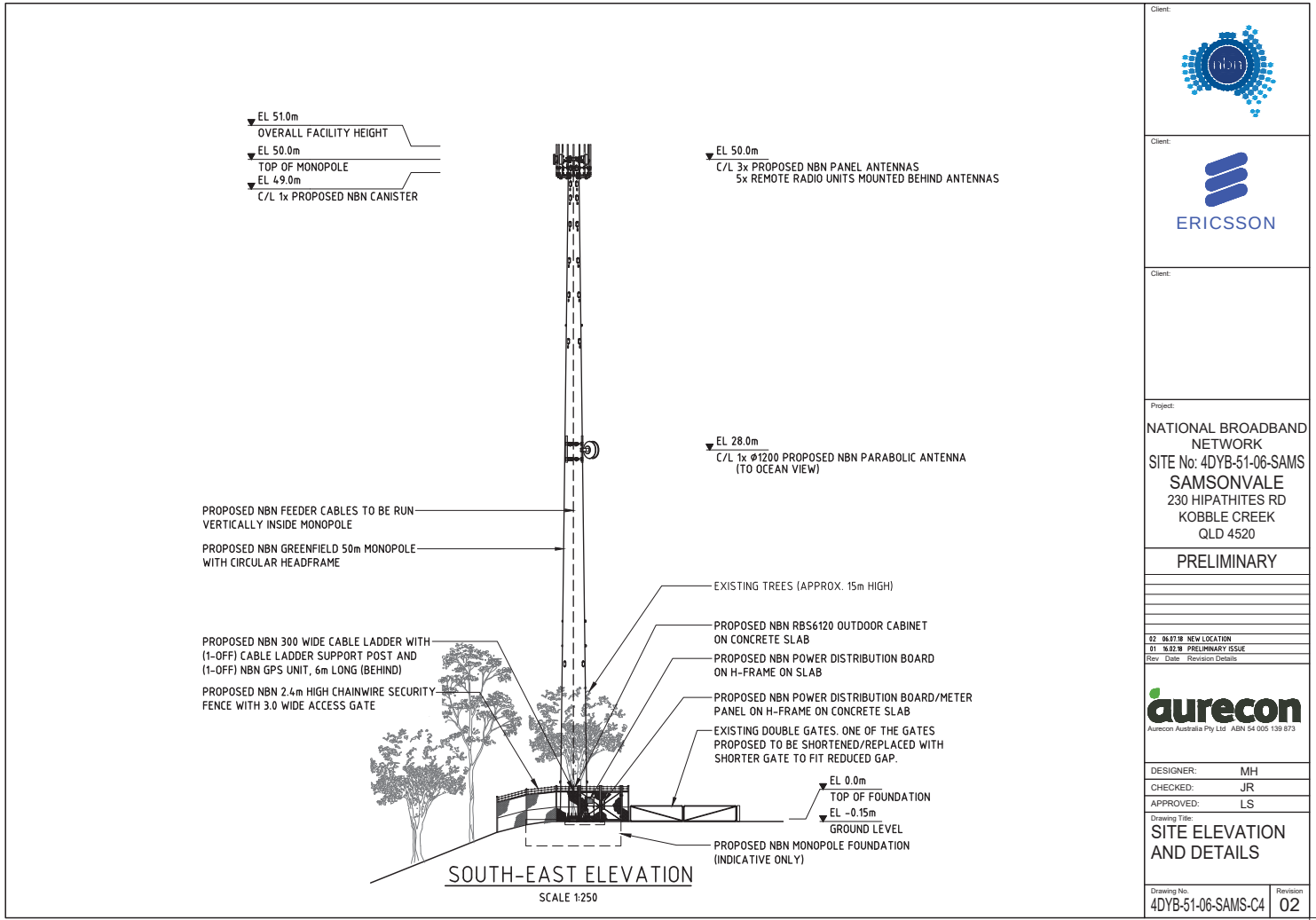
Drawing Title:
OVERALL SITE PLAN

Drawing No: 4DYB-51-06-SAMS-C2
Revision: 02

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20 10 0 10 20 30 40 50mm A3


HEAVY VEHICLE TURNING AREA. 180m
EXISTING FENCE ON BOUNDARY (TBC)
EXISTING NEIGHBOURS DRIVEWAY
EXISTING OWNERS DRIVEWAY
MGA
138.0m
139.0m
ADDITIONAL 10m x 20m CONSTRUCTION AREA REQUIRED FOR CRANE HARDSTAND. VEGETATION CLEARING REQUIRED.
4200
12000
4200
CL MONOPOLE
CL MONOPOLE
3000
10000
EXISTING DOUBLE GATES. ONE OF THE GATES PROPOSED TO BE SHORTENED/REPLACED WITH SHORTER GATE TO FIT REDUCED GAP.
PROPOSED NBN 1x Ø1200 PARABOLIC ANTENNA (TO OCEAN VIEW)
PROPOSED NBN 300 WIDE CABLE LADDER WITH (1-OFF) CABLE LADDER SUPPORT POST
PROPOSED NBN GPS UNIT (1-OFF)
PROPOSED NBN POWER DISTRIBUTION BOARD/METER PANEL ON H-FRAME
PROPOSED NBN BBS6101 OUTDOOR CABINET ON CONCRETE SLAB
PROPOSED NBN RBS6120 OUTDOOR CABINET ON CONCRETE SLAB
EXISTING FENCE PROPOSED TO BE MODIFIED
PROPOSED NEW FENCE TO MATCH REMOVED FENCE AND TO TIE INTO EXISTING FENCE
PROPOSED NBN CONSUMERS MAINS (VEGETATION CLEARING REQUIRED)
NBN SITE CONSTRUCTION AREA (APPROX. 20m x 10m)
PROPOSED NBN 50m MONOPOLE WITH CIRCULAR HEADFRAME
PROPOSED NBN MONOPOLE FOUNDATION (TBC)
PROPOSED NBN 3x PANEL ANTENNAS WITH NBN REMOTE RADIO UNITS TO BE FIXED BEHIND THE PANEL ANTENNAS
PROPOSED 75mm THICK SINGLE SIZED GRAVEL OVER WEED MAT WITH TIMBER EDGE
PROPOSED NBN 2.4m HIGH CHAINWIRE SECURITY FENCE WITH 3.0m WIDE ACCESS GATE
PROPOSED MINOR WIDENING OF EXISTING ACCESS TRACK TO SUIT NBN SITE ACCESS
EXISTING FENCE
NUE
135.0m
136.0m
137.0m
138.0m
139.0m
140.0m
137.0m
136.0m
DETAIL 1 C2
SCALE 1:100
LEGEND
NUE NUE NBN UNDERGROUND ELECTRICAL ROUTE
NBN COMPOUND FENCE
EXISTING PROPERTY FENCE
PROPERTY BOUNDARY
NOTE:
1. THE POWER ROUTE SHOWN ON THE DRAWINGS IS INDICATIVE ONLY. ELECTRICAL CONTRACTOR TO DETERMINE EXACT ROUTE. ELECTRICAL CONTRACTOR TO LOCATE AND IDENTIFY EXISTING U/G SERVICES PRIOR TO COMMENCEMENT OF WORK.
Client:
nbn
Client:
ERICSSON
Client:
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
PRELIMINARY
02 06.07.18 NEW LOCATION
01 16.02.18 PRELIMINARY ISSUE
Rev Date Revision Details
aurecon
Aurecon Australia Pty Ltd ABN 54 005 139 873
DESIGNER: MH
CHECKED: JR
APPROVED: LS
Drawing Title:
SITE SETOUT PLAN
Drawing No: 4DYB-51-06-SAMS-C3
Revision 02
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20 10 0 10 20 30 40 50mm
A3


EL 51.0m
OVERALL FACILITY HEIGHT
EL 50.0m
TOP OF MONOPOLE
EL 49.0m
C/L 1x PROPOSED NBN CANISTER
EL 50.0m
C/L 3x PROPOSED NBN PANEL ANTENNAS
5x REMOTE RADIO UNITS MOUNTED BEHIND ANTENNAS
EL 28.0m
C/L 1x Ø1200 PROPOSED NBN PARABOLIC ANTENNA
(TO OCEAN VIEW)
PROPOSED NBN FEEDER CABLES TO BE RUN
VERTICALLY INSIDE MONOPOLE
PROPOSED NBN GREENFIELD 50m MONOPOLE
WITH CIRCULAR HEADFRAME
EXISTING TREES (APPROX. 15m HIGH)
PROPOSED NBN RBS6120 OUTDOOR CABINET
ON CONCRETE SLAB
PROPOSED NBN POWER DISTRIBUTION BOARD
ON H-FRAME ON SLAB
PROPOSED NBN 300 WIDE CABLE LADDER WITH
(1-OFF) CABLE LADDER SUPPORT POST AND
(1-OFF) NBN GPS UNIT, 6m LONG (BEHIND)
PROPOSED NBN 2.4m HIGH CHAINWIRE SECURITY
FENCE WITH 3.0 WIDE ACCESS GATE
PROPOSED NBN POWER DISTRIBUTION BOARD/METER
PANEL ON H-FRAME ON CONCRETE SLAB
EXISTING DOUBLE GATES. ONE OF THE GATES
PROPOSED TO BE SHORTENED/REPLACED WITH
SHORTER GATE TO FIT REDUCED GAP.
EL 0.0m
TOP OF FOUNDATION
EL -0.15m
GROUND LEVEL
PROPOSED NBN MONOPOLE FOUNDATION
(INDICATIVE ONLY)
SOUTH-EAST ELEVATION
SCALE 1:250
Client:
Client:
ERICSSON
Client:
Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
PRELIMINARY
02 06.07.18 NEW LOCATION
01 16.02.18 PRELIMINARY ISSUE
Rev Date Revision Details
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Aurecon Australia Pty Ltd ABN 54 005 139 873
DESIGNER: MH
CHECKED: JR
APPROVED: LS
Drawing Title:
SITE ELEVATION AND DETAILS
Drawing No.
4DYB-51-06-SAMS-C4
Revision
02
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A3

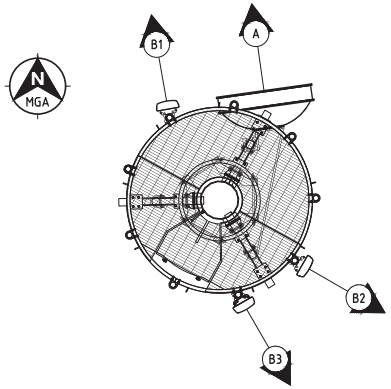
NBN ANTENNA CONFIGURATION - 3400MHz

SECTOR	SYMBOL	PANEL ANTENNA DETAIL								MAIN FEEDER DETAIL					RRU DETAIL						RF TAIL H&S 1/2" BIRD PROOFED LISCA CABLE	RET CABLE 1/TSR 484 21/2000
		TYPE	DIMENSION HxWxD	C/L HEIGHT	AZIMUTH (TN)	P1 & P2 E-TILT	P3 & P4 E-TILT	MECH TILT	ANTENNA ACTION REQ	TYPE	OVERALL LENGTH	CANISTER HEIGHT	CANISTER TO RRU LENGTH	FEEDER ACTION REQ	TYPE	LOCATION	C/L HEIGHT	ANTENNA PORT	RRU ACTION REQ	LENGTH	LENGTH
B1	B1	ARGUS SSPX310R	750x300x115	50m	350°	7°	7°	0°	INSTALL	H&S HYBRID MkII 6x6 (27.5mm)	60m	49m	2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
															RRUS2218	BEHIND	50m	3 & 4	INSTALL	1.5m	
B2	B2	ARGUS SSPX310R	750x300x115	50m	120°	6°	6°	0°	INSTALL				2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
B3	B3	ARGUS SSPX310R	750x300x115	50m	150°	5°	5°	0°	INSTALL				2m	INSTALL	RRUS2218	BEHIND	50m	1 & 2	INSTALL	1.5m	2m
															RRUS2218	BEHIND	50m	3 & 4	INSTALL	1.5m	
B4																					
B5																					
B6																					

NBN TRANSMISSION & GPS ANTENNA CONFIGURATION

ANTENNA	SYMBOL	ANTENNA DETAIL						MAIN FEEDER DETAIL			RAU DETAIL	
		TYPE	DIMENSION	C/L HEIGHT	AZIMUTH (TN)	DESTINATION	ANTENNA ACTION REQ	TYPE	OVERALL LENGTH	FEEDER ACTION REQ	QTY RAU	RAU ACTION REQ
A	A	PARABOLIC	ø1200	28m	352°	OCEAN VIEW	-	2x LDF1-50	38m	-	2	-
B												
GPS		KRE 101 2182/1	ø69x96	2.5m	N/A		-	LDF1-50	7m	-		

NOTE:
RRU HEIGHT TO BE +/- 250mm FROM SPECIFIED HEIGHTS. OFFSETS REQUIRED DUE TO MOUNTING ARRANGEMENT BACK TO BACK.



ANTENNA SETOUT PLAN
SCALE 1:50

Client:

Client:
ERICSSON

Client:

Project:
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520

PRELIMINARY

02 06.07.18 NEW LOCATION
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Rev Date Revision Details

aurecon
Aurecon Australia Pty Ltd ABN 54 005 139 873

DESIGNER:	MH
CHECKED:	JR
APPROVED:	LS

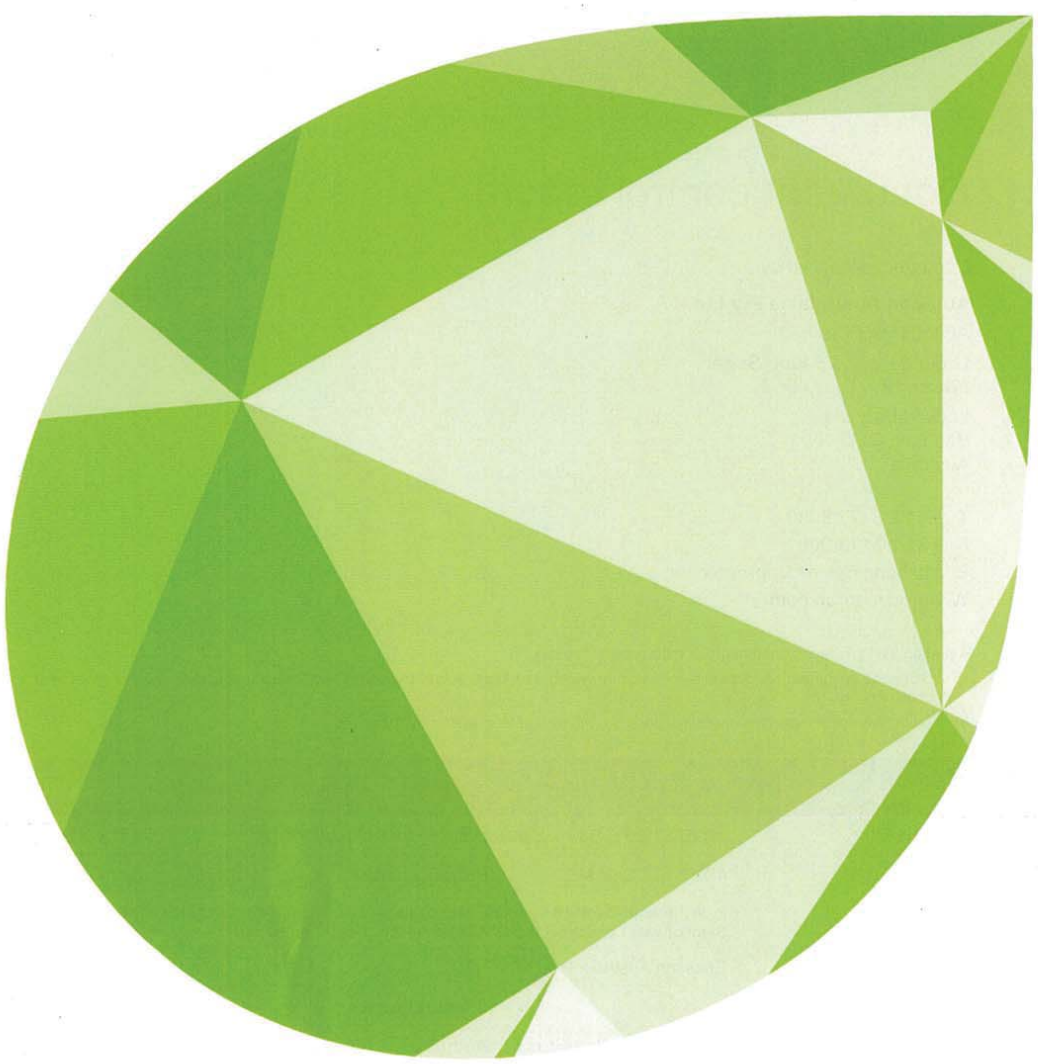
Drawing Title:
NBN ANTENNA CONFIGURATION & SETOUT PLAN

Drawing No.: 4DYB-51-06-SAMS-A1
Revision: 02

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Aooendix B
Geotechnical Investigation Report



aurecon

National Broadband Network Fixed Wireless Project

4DYB-51-06-SAMS – Samsonvale – Geotechnical Report

Ericsson Australia Pty Ltd

21 January 2019
Revision: 0
Reference: 247473

Bringing ideas to life

Document control record

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Title	Engineering Geologist	Title	Project Manager

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Borehole location plan
Appendix B
Borehole logs
Appendix C
Site photos

1 Introduction

Aurecon Australia Pty Ltd was commissioned by Ericsson Australia Pty Ltd to undertake a geotechnical investigation for the mobile network site titled Samsonvale, at Kobble Creek, Queensland 4520 (4DYB-51-06-SAMS) as part of the National Broadband Network Fixed Wireless project. It is understood that the following structures are proposed at the site:

- Construction of a 50m monopole,
- Outdoor cabinets on concrete slab on ground.

This report summarises the findings of a geotechnical investigation carried out at the site on the 19th of December 2018. Geotechnical recommendations have been provided based on the investigation.

The location of the site and borehole undertaken is presented on the site plan included as Appendix A.

2 Objectives

The scope of the site investigation included the following:

- Drilling of 1 exploratory boreholes to a minimum depth of 8.5m, or 3m of bedrock along with in-situ testing (SPT)
- Collection of bulk (disturbed) soil samples for visual examination
- Summarise findings of the geotechnical investigation including borehole logs, SPT
- Provide a geotechnical model for the site associated with engineering parameters
- Characterisation of the subsurface conditions on site;
- Classification of the site according to AS2870-2011: Residential Slabs and Footings;
- Obtaining in situ earth resistivity measurements at the proposed location of the monopole;
- Provision of a preliminary acid sulphate assessment; and
- Provide geotechnical parameters for foundation design for the proposed monopole and outdoor cabinet.

3 Methodology

The site investigation was carried out on the 19th of December 2018 under the full-time supervision of an Aurecon Engineering Geologist. The site investigation comprised one borehole drilled to a depth of 6.7m below the existing ground level (bgl) using a Boart Longyear DB520 E-Spec track mounted drill rig.

Earth resistivity testing was undertaken with the R1 and R2 traverses heading perpendicular in general north to south and east to west directions, adjacent to the borehole drilled. The location of the earth resistivity testing and borehole are shown on the site plan included in Appendix A.

Soil descriptions have been determined by an experienced Engineering Geologist in the field by tactile assessments and in situ testing results during the investigation.

No laboratory testing was conducted as part of the investigation.

3.1 Borehole drilling

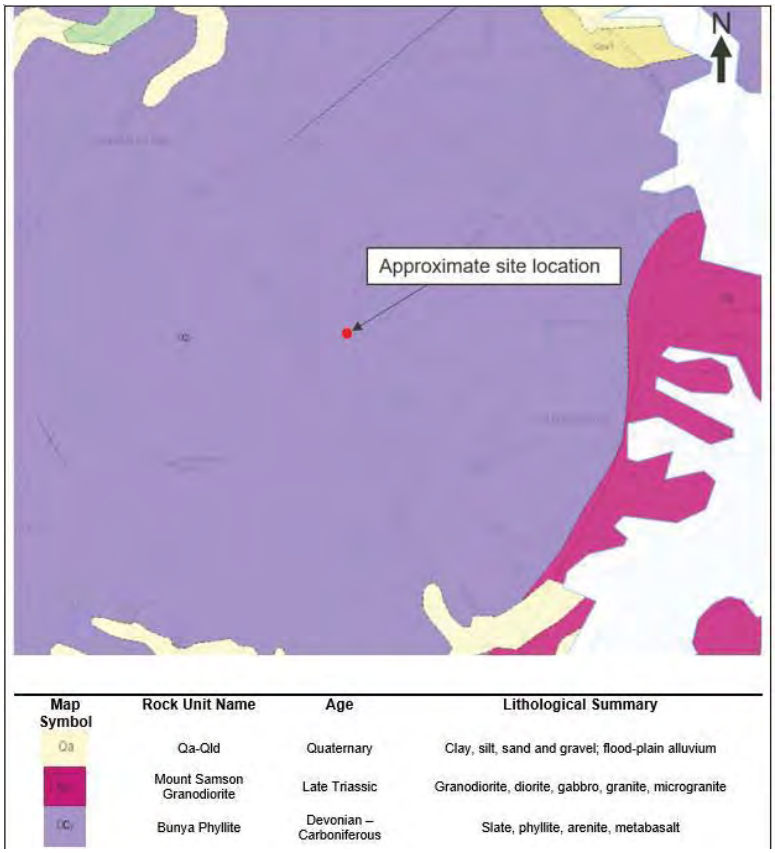
The borehole was advanced to 3.6 m bgl using solid flight augers equipped with a tungsten-carbide drill bit, followed by NMLC rock coring which extended to the termination depth of 9.0m bgl. In situ Standard Penetration Tests (SPTs) were conducted at 0.5m, 2.0m, and 3.5m bgl, in accordance with AS1289.6.3.1-2004.

The borehole log and accompanying explanatory notes are presented in Appendix B.

4 Results of the investigation

4.1 Site geology

The 1:100,000 detailed surface online geology map extracted from the Department of Mines and Energy website indicates that the site is likely to be underlain by Bunya Phyllite formation from the Devonian – Carboniferous age. The Bunya Phyllite formation typically consists of slate, phyllite, arenite and metabasalt.



Map Symbol	Rock Unit Name	Age	Lithological Summary
Qa	Qa-Qld	Quaternary	Clay, silt, sand and gravel; flood-plain alluvium
	Mount Samson Granodiorite	Late Triassic	Granodiorite, diorite, gabbro, granite, microgranite
	Bunya Phyllite	Devonian – Carboniferous	Slate, phyllite, arenite, metabasalt

Figure 1: 1:100,000 Detailed Surface Geology Map Extract (Department of Mines and Resources)

4.2 Site description

The proposed site is located on a private property with residential address 230 Hipathites Rd, Kobble Creek, QLD 4520.

The property is located approximately 10km south of the Dayboro Township. The surrounding region predominantly consists of farmland and densely vegetated forests. The regional topography is typically hilly terrain.

The proposed NBN lease area is situated just off to the side of a private road on the crest of a hill, sloping down towards the south-west at an average gradient of 15%. Phyllite rock outcrops were visible along parts of the road, evident in road cuttings and clearings with limited vegetation cover within 10m of the borehole location. At the time of the investigation, the site was covered with short to tall grass, small to large shrubs, and small to tall trees up to approximately 15m in height.

Trafficability across the site was found to be sufficient for light vehicles (4WD) and the track mounted drilling rig at the time of the investigation. Caution should be taken when considering access for heavy machinery, particularly after rainfall.

Dial Before You Dig plans did not indicate the presence of underground services within the general vicinity of the subject NBN site. Overhead powerlines exist along the existing road to the property, and height clearance should be ensured for construction plant and equipment.

A photograph taken at the time of investigation is provided below in Figure 1 for reference. Additional photographs of the site are included as Appendix C.



Figure 2: Site location facing south-east

4.3 Sub-surface profile

The borehole logs indicate that the subsurface profile at the Samsonvale site comprised residual soil (phyllite) that was a gravelly clayey sand from surface, grading into weathered PHYLLITE bedrock at approximately 3.6m bgl. The upper bedrock formation was typically extremely weathered to highly

weathered, with very low strength, becoming typically slightly weathered with high strength below 6.5m to the depth of investigation (9.0m). It is noted that the bedrock was variable, with weathered zones and significant core loss observed.

Groundwater seepage was not observed during the investigation.

The subsurface profile encountered within the borehole is summarised in Table 1 and the borehole log is included in Appendix B.

Table 1: Summary of ground conditions

Origin	Material	Depth (m) bgl		Consistency / Strength[1]	SPT 'N' (blows)
		From	To		
Residual	Gravelly Clayey SAND	0.0	3.6	Very dense	N* = 100 @ 0.5m N* = 80 @ 2.0m N* = 45 @ 3.5m
Bedrock	PHYLLITE	3.6	6.5	Very Low to Low Strength	-
		6.5	9.0 *(TD)*	High Strength	-

*Notes: **TD** – Termination Depth; N* - Extrapolated SPT N value, [1]: Where no in situ testing available for granular material, the strength has been inferred from engineering judgement.*

4.4 Earth resistivity testing

Earth resistivity testing was undertaken on site with a DET5/4R Megger Earth Tester using the Wenner Array method. A series of electrodes (steel spikes) were inserted into the ground along two orthogonal traverse lines (R1) and (R2), with a total length of 24 m. The electrode spacing along R1 and R2 ranged between 1 m and 8 m.

The soil resistivity testing traverses, R1 and R2, are indicated on the site plan included as Appendix A. The results of the earth resistivity testing are presented in Table 2.

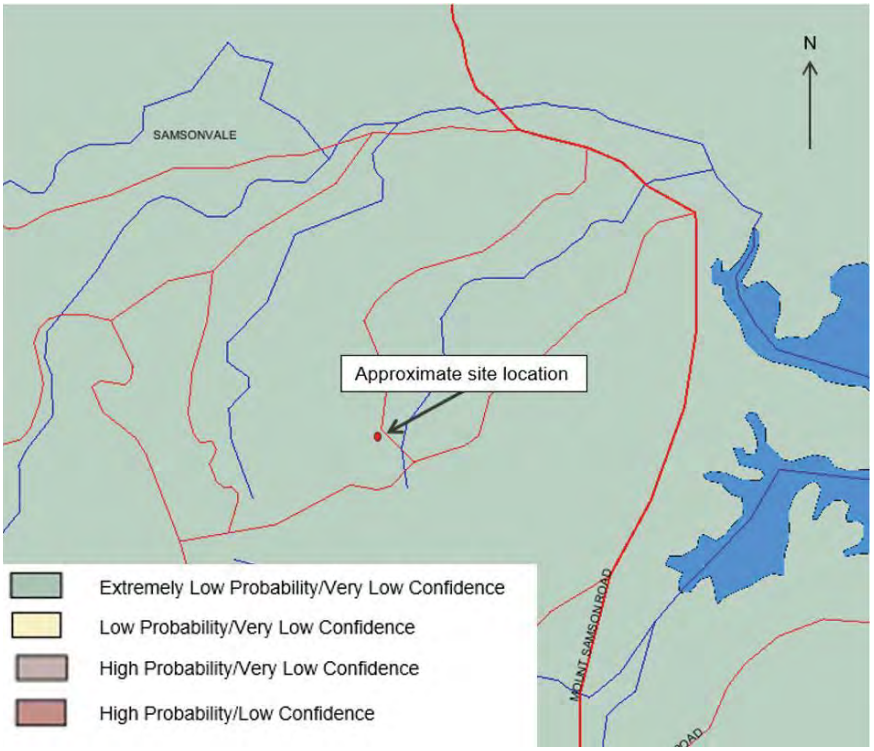
Table 2: Earth resistivity test results

Test	Electrode spacing (m)	Resistance R (Ω)		Resistivity ρ (Ω-m)	
		R1	R2	ρ1	ρ2
1	1.0	1,400	2,200	8,792	13,816
2	2.0	2,800	250	35,168	3,140
3	4.0	178	120	4,471	3,014
4	8.0	90	43	4,522	2,160

Note: Resistivity is calculated assuming homogeneous ground $\rho = 2\pi aR$, where 'a' is in metres and 'R' is in ohms (Wenner Array method)

The calculated earth resistivity values are based on the assumption of homogeneous ground conditions from the surface to a depth approximately equal to the electrode spacing. Non-homogeneous ground conditions may affect the calculated earth resistivity values. The electrical resistance of the ground can also be affected by moisture.

At the time of geotechnical investigations, the ground conditions were typically described as dry. Resistivity of the upper soil profile may change according to the prevailing moisture condition.



4.5 Acid Sulphate Soils

A desktop study was conducted to establish whether acid sulphate soils (ASS) may be present within the area. The ASS risk map (Figure 3), as published by the Australian Soil Resource Information System, showed the site to have an Extremely Low Probability of Occurrence for ASS. Thus, ASS sampling and testing was not undertaken for this site.

Should subsurface profile conditions change from those encountered during the investigation, further advice should be sought from Aurecon's ground engineering team.

Geotechnical Assessment

4.6 Site classification

The characteristic surface movement (y_s) has been calculated in accordance with AS 2870-2011 'Residential Slabs and Footings' in order to determine the site classification.

Soil classifications and plasticity's were based on qualitative descriptions as recorded on the borehole logs. The soil within the depth of design soil suction change (H_s) was identified as:

- Gravelly Clayey SAND, with low plasticity fines (0.0 – 3.6 m bgl)

Climate zone was selected using the Thornwaite Moisture Index (TMI) map of Queensland by Fox (2002). Depth of design soil suction change (H_s) was determined based on AS 2870-2011 Table 2.5.

Figure 3: Australian Soil Resource Information System Acid Sulphate Soils Map

The following parameters have been utilised in the calculation of characteristic surface movements:

- Climate Zone 1
- Depth of design soil suction change (H_s) 1.5m
- Change in suction at soil surface (Δu) 1.2 pF
- Maximum design drying depth close to trees (H_t) 3.0 m
- A maximum extra suction change due to tree group influences (Δu_{base}) 0.38 pF

Due to the surrounding trees, allowances for additional tree inducted suction effects have been factored in the characteristic surface movement calculations. Taking into consideration tree effects, the site is found to have a site classification of Class S. As a Class S site, the site may experience slight ground movement from moisture changes. Ground movements due to changes in moisture condition less than 20mm are expected.

4.7 Geotechnical design parameters

Geotechnical soil and rock parameters were derived from typical values, empirical formulae and correlations. Methods used for obtaining parameters are outlined below.

Bulk unit weights of soil layers (γ) were based on AS 4678-2002 Table D1 'Unit weights of soils (and similar materials)', whilst rock unit weights were based on Look (2014, Table 9.2).

The effective friction angle (ϕ') in non-cohesive soil types have been estimated with respect to angularity, grading and relatively density (AS4678-2002), based on a visual description of the soil.

The recommended value for Poisson's ratio, for both undrained and drained conditions (υ_u, υ'), were taken from typical values with respect to the observed soil plasticity (Look, 2014, Table 11.17).

The undrained and drained modulus of elasticity have been estimated with respect to strength of soil, from both a tactile assessment and in-situ testing (Look, 2014, Table 11.7).

Using the methods outlined, the recommended soil design parameters obtained are shown in Table 3.

Table 3: Recommended design geotechnical parameters

Material	Depth (m bgl)		Consistency / Strength	γ (kN/m³)	c_u (kPa)	c' (kPa)	ϕ' (deg)	E_u (MPa)	E' (MPa)	υ_u	υ'
	From	To									
PHYLLITE (recovered as Gravelly Clayey SAND)	0.0	3.6	Very dense (1)	20	-	-	36	-	70	0.30	0.30
PHYLLITE	3.6	6.5	Very Low strength	20	-	-	38	-	70	0.30	0.30
	6.5	9.0 *(TD)*	High strength	*See Table 4 for rock parameters.*							

*Notes: **γ**: Bulk unit weight; **Cu:** undrained shear strength; **c'**: drained cohesion; **ϕ'**: drained friction angle; **Eu**: undrained elastic modulus; **E**: drained elastic modulus; **υ_u**: undrained Poisson's ratio; **υ'**: drained Poisson's Ratio, **TD**: Termination Depth. (1): inferred strength based on engineering judgement*

Should the horizontal modulus of subgrade reaction (k_s) be required, it can be calculated using parameters as provided in Table 3 by the following formula (Bowles, 1997):

$$k_s = E / (B (1-\upsilon^2))$$

Where: E = Young's modulus

B = Pile diameter

υ = Poisson's ratio

A value of B=1 would be appropriate assuming a spring spacing of 1 m. The appropriate value of E will depend on the nature of the loading and whether it is a sustained load or transient load.

Please note this provides a lower bound for the horizontal modulus of subgrade reaction and the designer should consider a range of k values for determination of worst case due to soil variability. It is recommended to consider +30% when checking deflection, bending and shear forces.

The estimated Point Load Strength Index, Is(50), was interpreted based on the SPT data and field observations in accordance with in house site investigation manual (Aurecon, 2012). The Unconfined Compressive Strength (UCS) has been estimated to be 10 times the Is(50) value, in accordance with Look (2014).

Recommended values of Poisson's ratio for rock are based on Look (2014) Table 11.23 'Poisson's ratio for rock' using a correlation of rock type.

The deformation modulus (E) of the rock mass was based on the following relationship from Tomlinson (1996): $E = j \cdot M_r \cdot q_{uc}$

Where: j = Mass factor related to the discontinuity spacing in the rock mass, adopted as 0.2 for RQD < 50%

M_r = Modulus ratio, adopted as 300 for metamorphic rocks

q_{uc} = Unconfined Compressive Strength (MPa)

Recommended rock design parameters are shown in Table 4.

Table 4: Recommended design geotechnical parameters - rock

Material	Depth (m) bgl		Rock Strength	γ (kN/m³)	υ	RQD (%)	Is(50) (MPa)	UCS (MPa)	*E* (MPa)
	From	To							
PHYLLITE	3.6	6.5	Very Low strength	23	0.3	0 - 10	0.1	1	60
	6.5	9.0 *(TD)*	High strength	25	0.25	20	1	10	600

Notes: γ : Bulk unit weight; υ_u: Undrained Poisson's ratio; **υ'**: Drained Poisson's Ratio; Cu: undrained shear strength; ***c***': drained cohesion; **ϕ'**: drained friction angle; **E**: Elastic modulus; **Eu**: Undrained elastic modulus; *: Inferred SPT value due to refusal

4.8 Foundation design parameters

For the prevailing site conditions, a pad footing / shallow foundation has been considered as founding system for the monopole and capacities are indicated in the proceeding sections. Where pull out and lateral resistance is found to be inadequate with a shallow pad footing, rock anchors can be implemented in the design.

The following section presents a preliminary assessment of foundation parameters. At the time of detailed design, these analyses may need to be revised to reflect actual loading conditions and construction preferences.

The foundation should be designed in accordance with applicable Australian/New Zealand standards including *AS/NZS 4676-2000: Structural Design Requirements for Utility Services Poles*.

Groundwater was assumed to exist from surface level for the purposes of bearing capacity calculations.

4.8.1 Shallow foundation

Shallow foundations have been considered for the monopole and the outdoor cabinet. Where a shallow footing is not feasible, bored piles or rock anchors shall be considered.

Where a shallow pad footing is adopted, the designer shall carry out analyses on overturning and sliding stability in addition to long-term settlement, in accordance with AS/NZS 4676-2000. If the analyses show excess deformation or overturning instability a more deeply embedded or larger foundation shall be considered.

Typical footing size for a monopole foundation is considered to be 5.0 x 5.0 m, and when calculating the bearing capacity, the depth of the pad footing is assumed to be at the top of each respective soil layer. For the cabinet structure, a standard size of 1.0 x 2.4 m (W x L), embedded at a depth of 0.3 m is assumed. The load applied to the footing is taken to be in the vertical direction only.

Lateral restraint from the soils (passive resistance) should be ignored in shallow foundation design calculations due to the degree of movement necessary to fully mobilise passive resistance.

For long-term loads, the ultimate sliding resistance at the base of the foundation was estimated based on Das (2007) Section 8.6 'Checks for sliding along the base', using the following equation:

$$R_{ugs} = (V) \tan (k_1 \phi') + k_2 c' A$$

Where:

R_{ugs} = Unfactored ultimate sliding resisting friction (kN)

V = Unfactored vertical load on footing (kN)

k_1, k_2 = range from $^1/_2$ to $^2/_3$ (k_1 and k_2 are assumed to be both $^2/_3$)

c' = Effective cohesion (kPa)

A = Contact area (sq.m)

Estimated values for the ultimate unfactored bearing capacity (q_b) and sliding resistance (R_{ugs}) are presented in Table 5. Where appropriate, the effect of the weaker strata below has been taken into account to arrive at an appropriate design value.

Overturning or lateral pile loads need to be considered by the designer once the structural (wind load) forces are known.

Table 5: Estimated design parameters – Shallow pad footing

Material	Depth (m bgl)		Ultimate Unfactored Bearing Capacity, q_b (kPa)	Ultimate Unfactored Sliding Resistance, R_{ugs} (kN)
	From	To		
PHYLLITE (recovered as Gravelly Clayey SAND)	0.0	3.6	**Monopole** – 1,000 **Cabinet** – 350	0.45·V
PHYLLITE	3.6	5.2	1,000	0.47·V

The ultimate unfactored bearing capacity of the bedrock formation from depths 3.6m to 6.5m bgl has been limited to 1 MPa to account for the weathered zones and core loss observed. Founding level more than 3.5m is not recommended due to large excavation.

For limit state design, a geotechnical strength reduction factor of 0.35 and 0.45 should be applied to the ultimate unfactored bearing capacity and sliding resistance, respectively.

Under working stress analysis, a factor of safety of 3 would be appropriate for both cases.

AS5100.3-2004 'Bridge design – foundations and soil supporting structures' and AS2159 'Piling – Design and installation' were utilised to obtain geotechnical strength reduction factors (ϕ_g) for shallow pad footings.

If the footing size or shear strength of substrata material is different from the assumptions discussed in this report, or if during the excavation phase the ground conditions vary from those indicated at the time of investigation, further advice should be sought from Aurecon's ground engineering team.

4.8.2 Piled Foundation

This report provides capacity values for bored piles at the Samsonvale site. The designer may consider raking piles for lateral stability if required.

Piles should have an embedded length of at least 4 x pile diameter (D/B=4) to allow distribution of both vertical and horizontal loads to the ground and be designed in accordance with the requirements of AS2159-2009. It is recommended that each pile be inspected by a geotechnical professional to confirm the geotechnical profile and pile capacity.

Bored pile capacity calculations consider single pile theory only. Where more than one pile is required to achieve capacity, a minimum centre-to-centre spacing of 3 x pile diameter, D, is recommended.

To allow for gapping, in accordance with AS 2159, side friction capacities shall be ignored to a depth which is equal to the greater of 1.5 times the pile diameter below the pile cap or 0.5 m bgl.

Values for the ultimate unfactored bearing capacity (q_b) and side friction (q_s) are provided in Table 6 for a bored pile foundation design. These values provided assume pile depth to be at the top of the respective layer, and where required, have taken into account the effect of the weaker strata below to arrive at an appropriate design value.

Table 6: Recommended design parameters – Bored Piled foundation

Material	Depth (m bgl)		Ultimate Unfactored Bearing Capacity, q_b (kPa)	Ultimate Unfactored Side friction, q_s[(1)] (kPa)
	From	To	D/B > 4	
PHYLLITE (recovered as Gravelly Clayey SAND)	0	3.6	Not recommended	
PHYLLITE	3.6	5.2	3600	30
	5.2	6.5	5200	30
	6.5	9.0 *(TD)*	6500	630

Notes: [(1)] Where piles are to develop resistance to pull out then the ultimate shaft capacity should be factored down in accordance with the relevant standard. [(2)] shaft friction for about top 0.9m pile length is excluded to place the pile top cap.

1.1.1 Rock anchors

If resistance to pull out and lateral force is not adequate using a shallow pad footing, rock anchors can be used to provide non-vertical load resistance and adhesion between the concrete footing and the bedrock. The depth, spacing, and size of the anchors shall be designed with consideration to the rock mass condition, strength, fracture intensity and condition, and properties of the anchors. The rock anchors should be designed in accordance with applicable Australian/New Zealand standards including AS/NZS 4678-2002: Earth Retaining Structures.

A minimum fixed anchor length is recommended to be 3.0 m in accordance with AS 4678-2002 to account for variable rock quality and constructional imperfections. Ultimate unfactored bond adhesion is recommended in Table 6 for rock anchor design. It should be noted that cone pull-out may control anchor capacity and should also be checked.

The designer should apply reduction factors to the ultimate unfactored strength for the importance category, material factor, and structure classification in accordance with AS 4678-2002.

Table 6: Recommended design parameters – Rock anchors

Material	Depth (m bgl)		Ultimate Unfactored Bond adhesion, F_s[(1)] (kPa)
	From	To	
PHYLLITE	3.6	5.2	30
	5.2	6.5	30
	6.5	9.0 *(TD)*	630

Notes: (1) Where piles are to develop resistance to pull out then the ultimate shaft capacity should be factored down in accordance with the relevant standard.

Where rock anchors are to develop resistance to pull out then the ultimate shaft capacity shall be based on 35% of the values given for F_s above. The total uplift capacity should also consider an upper bound to uplift capacity based on a pullout cone with an apex angle of 60°.

5 Construction considerations

Trafficability should be assessed prior to heavy vehicles and machinery accessing the site, particularly in wet weather conditions.

Allowances for groundwater seepage and the effects of pore water pressure should be considered during the constructability assessment. If groundwater is encountered temporary shoring, and/or dewatering may be required. Materials, plant and equipment should not be located behind the crest of any excavation within an offset from the crest that is equal to the depth of the excavation, since surcharging effects may reduce slope instability.

It is expected that excavatability may be an issue due the presence of high strength bedrock within close proximity to the site surface. In this regard, rock-breaking equipment may be required. It is recommended that the geotechnical information be provided to the potential contractor to assist them in choosing the appropriate construction plant and methodologies for the project.

Excavation work should be conducted in accordance with Safe Work Australia Code of Practice for Excavation (2012). Open trench type excavations deeper than 1.5 m deep should be stepped, battered, or appropriately shored in accordance with the requirements by the Code of Practice.

It is recommended that the ground stratification and materials encountered during installation of the foundation(s) be inspected and approved by an experienced geotechnical professional to confirm the design intent and provided geotechnical design parameters.

6 References

AS 1289.6.3.1-2004. Australian Standard: Methods of Testing Soils for Engineering Purposes – Soil Strength and Consolidation Tests – Determination of the Penetration Resistance of a Soil – Standard Penetration Test. Standards Australia.

AS 2159-1978. Australian Standard: SAA Piling Code. Standards Australia.

AS 2159-2009. Australian Standard: Piling Design and Installation. Standards Australia, Sydney, NSW, Australia.

AS 2870-2011. Australian Standard: Residential Slabs and Footings. Standards Australia, Sydney, NSW, Australia.

AS 4676-2000. Australian/New Zealand Standard: Structural Design Requirements for Utility Services Poles. Standards Australia, Sydney, NSW, Australia.

AS 5100.3-2004. Australian Standard: Bridge Design Part 3 Foundations and Soil-Supporting Structures. Standards Australia, Sydney, NSW, Australia.

Aurecon Australia Pty Ltd, 2012: Geotechnical Site Investigation Manual. Revision No. 5. Aurecon Australia, Neutral Bay, NSW, Australia

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Department of Mines and Resources. (2017). 1:100 000 Detailed Surface Geology Map Extract, Available: http://minesonlinemaps.business.qld.gov.au.

Fox, E. 2002. Development of a Map of Thornthwaite Moisture Index Isopleths for Queensland. Australian Geomechanics.

Look, B.G. 2014: Handbook of Geotechnical Investigation and Design Tables. 2nd edition. Taylor & Francis.

Mitchell, P.W. 1984: The Design of Shallow Footings on Expansive Soil, PhD thesis, Department of Civil Engineering, University of Adelaide, Australia.

7 Limitations

This report has been prepared for the use of the client, Ericsson Australia Pty Ltd. This report has not been prepared for use by parties other than the client, and the client's respective consulting advisors. As subsurface conditions may vary, the borehole log(s) represents subsurface conditions at the specific test location only. The interpretation has been based on experience and understanding of the geotechnical processes relevant to the site, bearing in mind the necessary limitations in frequency of drilling and sampling due to cost and time constraints. Should conditions exposed at the site during excavation vary significantly from the interpretation provided in this report based on the project specific factors cited in the introductory scope of the report, it is requested that Aurecon be informed and have the opportunity to review any of the findings of this report.

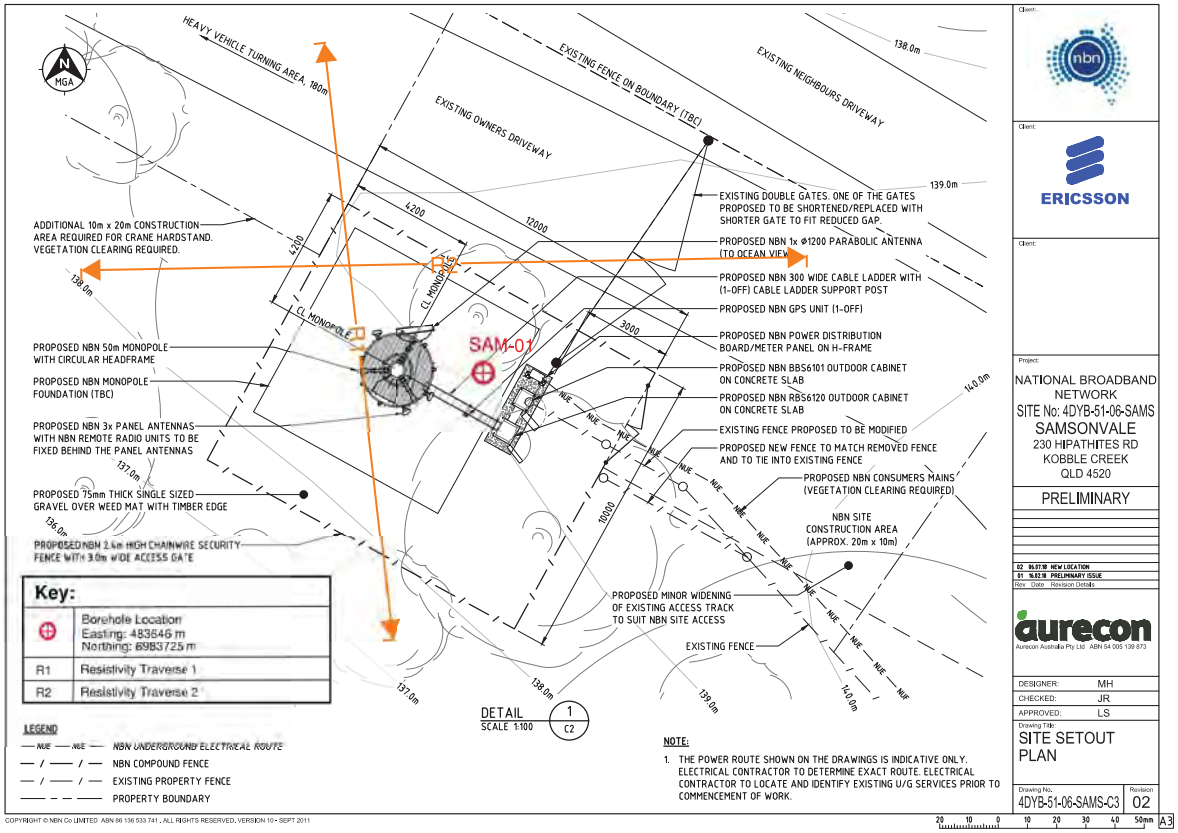
This report has been written with the express intent of providing sufficient information for design purposes. Subsurface conditions relevant to construction works should be assessed by contractors who can make their own interpretation of the factual data provided as a borehole log and perform any additional tests as necessary for their own purposes.

It is strongly recommended that any plans and specifications prepared by others and relating to the content of this report or amendments to the original plans and specifications be reviewed by Aurecon to verify that the intent of our recommendations is properly reflected in the design.

There are always some variations in subsurface conditions across a site that cannot be defined even by exhaustive investigation. Hence, it is unlikely that the measurements and values obtained from sampling and testing during the investigation will represent the extremes of conditions which exist within the site.

Further, subsurface conditions, including groundwater levels and apparent resistivity, can change over time. This should be borne in mind, particularly if the report is used after a protracted delay.

Appendix A
Borehole location plan


HEAVY VEHICLE TURNING AREA, 180m
EXISTING FENCE ON BOUNDARY (TBC)
EXISTING NEIGHBOURS DRIVEWAY
EXISTING OWNERS DRIVEWAY
138.0m
139.0m
ADDITIONAL 10m x 20m CONSTRUCTION AREA REQUIRED FOR CRANE HARDSTAND. VEGETATION CLEARING REQUIRED.
4200
12000
4200
CL MONOPOLE
EXISTING DOUBLE GATES. ONE OF THE GATES PROPOSED TO BE SHORTENED/REPLACED WITH SHORTER GATE TO FIT REDUCED GAP.
PROPOSED NBN 1x Ø1200 PARABOLIC ANTENNA (TO OCEAN VIEW)
PROPOSED NBN 300 WIDE CABLE LADDER WITH (1-OFF) CABLE LADDER SUPPORT POST
PROPOSED NBN GPS UNIT (1-OFF)
PROPOSED NBN POWER DISTRIBUTION BOARD/METER PANEL ON H-FRAME
PROPOSED NBN BBS6101 OUTDOOR CABINET ON CONCRETE SLAB
PROPOSED NBN RBS6120 OUTDOOR CABINET ON CONCRETE SLAB
EXISTING FENCE PROPOSED TO BE MODIFIED
PROPOSED NEW FENCE TO MATCH REMOVED FENCE AND TO TIE INTO EXISTING FENCE
PROPOSED NBN CONSUMERS MAINS (VEGETATION CLEARING REQUIRED)
NBN SITE CONSTRUCTION AREA (APPROX. 20m x 10m)
PROPOSED NBN 50m MONOPOLE WITH CIRCULAR HEADFRAME
PROPOSED NBN MONOPOLE FOUNDATION (TBC)
PROPOSED NBN 3x PANEL ANTENNAS WITH NBN REMOTE RADIO UNITS TO BE FIXED BEHIND THE PANEL ANTENNAS
PROPOSED 75mm THICK SINGLE SIZED GRAVEL OVER WEED MAT WITH TIMBER EDGE
PROPOSED NBN 2.4m HIGH CHAINWIRE SECURITY FENCE WITH 3.0m WIDE ACCESS GATE
SAM-01
3000
10000
14.0m
137.0m
136.0m
PROPOSED MINOR WIDENING OF EXISTING ACCESS TRACK TO SUIT NBN SITE ACCESS
EXISTING FENCE
Key:
Borehole Location
Easting: 483546 m
Northing: 6983725 m
R1 Resistivity Traverse 1
R2 Resistivity Traverse 2
DETAIL 1/C2 SCALE 1:100
LEGEND
NBN UNDERGROUND ELECTRICAL ROUTE
NBN COMPOUND FENCE
EXISTING PROPERTY FENCE
PROPERTY BOUNDARY
NOTE:
1. THE POWER ROUTE SHOWN ON THE DRAWINGS IS INDICATIVE ONLY. ELECTRICAL CONTRACTOR TO DETERMINE EXACT ROUTE. ELECTRICAL CONTRACTOR TO LOCATE AND IDENTIFY EXISTING U/G SERVICES PRIOR TO COMMENCEMENT OF WORK.
COPYRIGHT © NBN Co LIMITED ABN 86 136 533 741. ALL RIGHTS RESERVED. VERSION 10 - SEPT 2011
ERICSSON
NATIONAL BROADBAND NETWORK
SITE No: 4DYB-51-06-SAMS
SAMSONVALE
230 HIPATHITES RD
KOBBLE CREEK
QLD 4520
PRELIMINARY
02 06.07.19 NEW LOCATION
01 16.02.19 PRELIMINARY ISSUE
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DESIGNER: MH
CHECKED: JR
APPROVED: LS
SITE SETOUT PLAN
4DYB-51-06-SAMS-C3
02
A3

Appendix B
Borehole logs

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EXPLANATORY NOTES AND ABBREVIATIONS

The following information provides the terms and abbreviations used in Aurecon geotechnical borelogs and reports. Description of soil and rock are generally in accordance with the Unified Soil Classification System and Australian Standard AS1726-1993, Geotechnical Site Investigations. Soil and rock descriptions using established field techniques have been recorded independent of any laboratory test results. As far as is practicable the data contained on the log sheets is factual. Some interpretation is inevitable in the assessment of conditions between samples and of the origin of the materials. Standard colour charts have not been used.

Assessment of potential site contamination does not form part of this geotechnical report. Any reference to potential contaminants is for information only, and does not necessarily indicate the presence or absence of soil or groundwater contamination.

Soil Description

Soils are generally described in the borelog using the following sequence of terms:

[Drilling Information]; [USC Symbol]; [Soil Type, Colour, Plasticity/Particle Description, Structure]; [Moisture Condition]; [Consistency]

Unified Soil Classification Group Symbols

Typical Names	USC Symbol
Well graded gravels	GW
Poorly graded gravels	GP
Silty gravels	GM
Clayey gravels	GC
Inorganic silts of low plasticity.	ML
Inorganic silts of high plasticity	MH
Organic silts of low plasticity	OL
Organic clays of high plasticity	OH

Typical Names	USC Symbol
Well graded sands	SW
Poorly graded sands	SP
Silty sands	SM
Clayey sands	SC
Inorganic clay of low plasticity	CL
Inorganic clay of medium plasticity	CI
Inorganic clays of high plasticity	CH
Peat and other highly organic soils	Pt

Soil Type and Particle Size

Major Divisions		Symbols	Subdivision	Particle Size
Coarse Grained Soils (more than half of material is larger than 0.075mm)	Boulders			> 200 mm
	Cobbles			63 mm – 200 mm
	Gravels (more than half of coarse fraction is larger than 2.36mm)	G	Coarse	20 mm – 63 mm
			Medium	6 mm – 20 mm
			Fine	2.36 mm – 6 mm
	Sands (more than half of coarse fraction is smaller than 2.36mm)	S	Coarse	0.6 mm – 2.36 mm
			Medium	0.2 mm – 0.6 mm
			Fine	75 μm – 0.2 mm
Fine Grained Soils (more than half of material is smaller than 0.075mm)	Silts	M		< 75 μm
	Clays	C		
	Organic	O		

Soil Plasticity

Term	Symbol	Field Assessment	
Low Plasticity	L	Cannot be rolled into threads when moist	
Medium Plasticity	I ; L / H	Can be rolled into threads when moist.	Shows some shrinkage on drying
High Plasticity	H		Considerable shrinkage on drying. Greasy to touch. Cracks in dry material

Moisture Content

Term	Symbol	Field Assessment	
		Cohesive Soils	Granular Soils
Dry	D	Hard and friable or powdery	Runs freely through hands.
Moist	M	Feels cool, darkened in colour	
		Can be moulded	Tend to cohere.
Wet	W	Feels cool, darkened in colour	
		Free water forms on hands when handling	Tend to cohere

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Consistency of Cohesive Soil

Term	Symbol	Field Assessment	Undrained Shear Strength (kPa)
Very Soft	VS	Exudes between fingers when squeezed.	< 12
Soft	S	Can be moulded by light finger pressure.	12 – 25
Firm	F	Can be moulded by strong finger pressure.	25 – 50
Stiff	St	Cannot be moulded by fingers. Can be indented by thumb pressure.	50 – 100
Very Stiff	VSt	Can be indented by thumb nail.	100 – 200
Hard	H	Difficult to indented by thumb nail.	> 200

Consistency of Non-cohesive Soil

Term	Symbol	Field Assessment	SPT N – Value	Density Index (%)
Very Loose	VL	Foot Imprints easily.	< 4	< 15
Loose	L	Can be excavated with spade. 50mm peg easily driven	4 – 10	15 –35
Medium Dense	MD	Shovelling difficult	10 – 30	35 – 65
Dense	D	Needs pick for excavation. 50mm peg hard to drive.	30 – 50	65 – 85
Very Dense	VD	Picking difficult	> 50	> 85
Cemented	C	Cemented, indurated or large size particles	> 50	N / A

Rock Description

Rocks are generally described in the borelog using the following sequence of terms:

[Drilling Information]; [Weathering]; [Rock Type, Colour, Structure]; [Rock Quality Designation]; [Strength]; [Defects]

Rock Weathering Classification

Term	Symbol	Field Assessment
Residual Soil	RS	Soil developed on extremely weathered rock; the mass structure and substance fabric are no longer evident; there is a large change in volume but the soil has not been significantly transported.
Extremely Weathered	XW	Soil is weathered to such an extend that it has 'soil' properties ie it either disintegrates or can be remoulded, in water.
Distinctly Weathered	DW	Rock strength usually changed by weathering. The rock may be highly discoloured, usually by ironstaining. Porosity may be increased by leaching, or may be decreased due to deposition of weathering products in spores.
Slightly Weathered	SW	Rock is slightly discoloured but shows little or no change of strength from fresh rock.
Fresh	FR	Rock shows no sign of decomposition or staining.

Rock Strength

Strength	Symbol	Field Assessment		Point Load Index $I_s(50)$ (MPa)
		By Hand	Hammer with Hand Held Specimen	
Extremely Low	EL	Easily remoulded to a material with soil properties.		< 0.03
Very Low	VL	Easily crumbled in 1 hand.		0.03 – 0.1
Low	L	Broken into pieces in 1 hand.		0.1 – 0.3
Medium	M	Broken with difficulty in 2 hands.	Easily broken with light blow (thud).	0.3 – 1.0
High	H		1 firm blow to break (rings).	1.0 – 3.0
Very High	VH		> 1 blow to break (rings)	3.0 – 10
Extremely High	EH		Many blows to break (rings).	> 10

Notes on rock strength

1. These items refer to the strength of the rock material and not to the strength of the rock mass which may be considerably weaker due to the effect of rock defects.
2. Anisotropy of rock material samples may affect the field assessment of strength
3. The unconfined compressive strength is typically about 20 x I_s (50), but the multiplier may vary widely for different rock types.

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Rock Defects

Defects are generally described using the following sequence of terms: *[Defect Spacing]; [Depth (metres from surface), Defect Type, Defect Angle (degrees from horizontal), Surface roughness, Infill, Defect thickness (mm)*]

Defect Spacing

Description	Spacing
Extremely closely spaced	< 20mm
Very closely spaced	20mm to 60mm
Closely spaced	60mm to 200mm
Medium spaced	0.2m to 0.6m
Widely spaced	0.6m to 2.0m
Very widely spaced	2.0m to 6.0m
Extremely widely spaced	> 6.0m

Defect Description

Defect Type	Surface Roughness		Coating or Infill
	Macro-surface geometry	Micro- surface geometry	
Bp – Bedding Parting	St – Stepped	Ro – Rough	cn – clean
Fp – Foliation Parting	Cu – Curved	Sm – Smooth	sn – stained
Jo – Joint	Un – Undulating	Sl – Slickensided	vn – veneer
Sh – Sheared Zone	Ir – Irregular		cg – coating
Cs – Crushed Seam	Pl – Planar		
Ds – Decomposed seam			
Is – Infilled Seam			

Water

▼	Measurement standing water level and date
▽	Water Noted
►	Water inflow
◄	Water / drilling fluid loss

Support

C	Casing
M	Mud
W	Water

Method

BH EX	Backhoe bucket (rubber tyred machine) Excavator bucket (tracked machine)
HA	Hand Auger
AV	Auger drilling with steel "V" bit
AT	Auger drilling with Tungsten Carbide (TC) bit
HOA	Hollow Auger

RA RM RC	Rotary drilling with flushing of cuttings using - air circulation - bentonite or polymer mud circulation - water circulation
NMLC	Coring using an NMLC core barrel
RR	Tricone (Rock Roller) Bit
DB	Drag(Blade) Bit

Field Sampling and Testing

Symbol	Sample or Test
W	Water Sample
D	Disturbed Sample
B	Bulk Disturbed Sample
SPT	Standard Penetration Test
- 7, 11, 12 (eg)	Example of blows per 150mm penetration
- N = 23 (eg)	Penetration Resistance (blows for 300mm penetration following 150mm seating drived, Example of 11 + 12 = 23
- 25/20mm (eg)	Partial Penetration, example of blow for the measured penetration
- N*	Inferred SPT Value

Symbol	Sample or Test
- RW	Rod Weight only causing penetration (N < I)
- HW	Hammer and rod weight only causing full penetration (N < I)
- HB	Hammer Bouncing (N* > 50)
U (50)	Undisturbed Sample (50mm diameter tube)
PP	Pocket Penetrometer Test (kPa)
FV	Field Shear Vane (kPa)
RQD	Rock Quality Designation expressed as : $\frac{\text{Sum of lengths of sound core pieces > 100mm}}{\text{Total Length of core section considered}}$
DCP	Dynamic Cone Penetrometer measured in blows / 100mm

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

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Leading, Vibrant, Global.
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Brisbane QLD 4000
ph: +61 7 3173 8000
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SOIL SAM-01

Client: **Ericsson**
Project: **NBN Fixed Wireless**
Location: **Samsonvale**
Project Number: **247473**

Driller: **Numac**
Rig: **DB520 E-Spec**
Easting: **483646 m**
Northing: **6983725 m**
Elevation: **(Unknown) mAHD**

Commenced:**19/12/2018**
Completed: **19/12/2018**

Sheet:1 of 3

Drilling Information				Soil Description				Testing		Strata Information			
Groundwater	Drilling Method	Sample Type	Depth (m)	MATERIAL DESCRIPTION Soil Type, Colour, Plasticity or Particle Characteristic, Secondary and Minor Components	USC	Moisture Content	Consistency / Relative Density VS VL, S L, F MD, St D, VSt VD, H C	Comments / Origin Note: Pocket Penetrometer Results in kg/cm2	In-situ Testing	Graphic Log	Elevation (mAHD)	Depth (m)	Installation
	AD/T	D	0.5	**0 m: Gravelly clayey SAND** Grey brown, fine to coarse with angular gravel (phyllite), low plasticity clay fines, dry	SP	D		Residual Soil (Phyllite)				0.5	
		SPT		**0.7 m:** Very dense, becoming brown grey, mottled orange brown					SPT@ 0.50 to 0.94m 5 / 8, 30/135mm (N*=100)				
			1.0	**1 m: Gravelly clayey SAND** Grey, fine - medium sand, fine to coarse angular gravel, low plasticity clay, dry	SP			Material is extremely weathered phyllite				1.0	
			1.5									1.5	
		SPT	2.0						SPT@ 2.00 to 2.26m 23 / 30/110mm (N*=80)			2.0	
			2.5									2.5	
			3.0									3.0	
		SPT	3.5	**3.5 m:** Becoming brown, increased clay fines					SPT@ 3.50 to 3.60m 30/100mm (N*=) HB			3.5	
				Continued as Cored Drill Hole									
			4.0									4.0	
			4.5									4.5	

Remarks:
1. Borehole coordinates obtained using handheld GPS with accuracy +/- 6m.
2. Borehole backfilled with cuttings immediately upon completion of drilling.
3. No groundwater encountered during augering.
4. Ground elevation not recorded.

Logged: **TL**
Logged Date: **19/12/2018**
Checked: **JB**
Checked Date: **8/01/2019**

File Name: P:\WP\ADMIN\GEOTECH\TENDERS\ PROPOSALS AND PRO_TECTS\247473 NBN SAMSONVALE LANDSLIDE AND GI ASSESSMENT\5_REPORTING\APRENDIXES\2_BOREHOLE LOGS\SAMSONVALE.GDT

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CORED SAM-01

Client: **Ericsson**
Project: **NBN Fixed Wireless**
Location: **Samsonvale**
Project Number: **247473**

Driller: **Numac**
Rig: **DB520 E-Spec**
Easting: **483646 m**
Northing: **6983725 m**
Elevation: **(Unknown) mAHD**

Commenced:**19/12/2018**
Completed: **19/12/2018**

Sheet:2 of 3

Drilling Information						Rock Description	Intact Strength			Rock Mass Defects		Strata Information		
Groundwater	Drilling Method	TCR (%)	SCR (%)	RQD (%)	Depth (m)	MATERIAL DESCRIPTION Rock Type; Colour; Grain Size; Mineralogy Characteristics; Fracture Details; Strength	Weathering	$Is_{(50)}$ A/Ir/D (MPa)	UCS (MPa)	ESTIMATED STRENGTH Is(50) ● - Axial ○ - Diametral (EL, VL, L, M, H, VH, EH; -0.03, -0.1, -0.3, -1, -3, -10)	Defect Spacing (mm) (20, 40, 100, 300, 1000)	Defect Description (depth, type, angle, shape, roughness, infill)	Graphic Log	Elevation (mAHD)	Depth (m)
					0.5									0.5
					1.0									1.0
					1.5									1.5
					2.0									2.0
					2.5									2.5
					3.0									3.0
					3.5	*Start Coring at 3.60m*								3.5
	NMLC	92		10	4.0	**3.6 m: Phyllite** Grey, some light brown, fine grained, low strength, foliated, frequent quartz veins rubble at base of core	XW MW					4.10m: JT, 80°, PL, SM, CN 4.26m: JT, 80°, PL, SM, CN 4.31m: JT, 60°, PL, SM, CN			4.0
		48		0	4.5	**4.4 m: CORE LOSS** (0.45m) Core loss likely attributed to rock quality	XW					4.95m: VN, Qz			4.5

Remarks:
1. Borehole coordinates obtained using handheld GPS with accuracy +/- 6m.
2. Borehole backfilled with cuttings immediately upon completion of drilling.
3. No groundwater encountered during augering.
4. Ground elevation not recorded.

Logged: **TL**
Logged Date: **19/12/2018**
Checked: **JB**
Checked Date: **8/01/2019**

Plot File Name: P:\WP\ADMIN\GROUP\TEMPLATES AND PROJECTS\PROJECTS\247473 NBN SAMSONVALE LANDSLIDE AND GT ASSESSMENT\5_REPORTING\APPENDICES\2_BOREHOLE LOGS\SAMSONVALE.GPJ

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

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CORED SAM-01

Client: **Ericsson**
Project: **NBN Fixed Wireless**
Location: **Samsonvale**
Project Number: **247473**

Driller: **Numac**
Rig: **DB520 E-Spec**
Easting: **483646 m**
Northing: **6983725 m**
Elevation: **(Unknown) mAHD**

Commenced:**19/12/2018**
Completed: **19/12/2018**

Sheet:3 of 3

Drilling Information						Rock Description		Intact Strength			Rock Mass Defects			Strata Information		
Groundwater	Drilling Method	TCR (%)	SCR (%)	RQD (%)	Depth (m)	MATERIAL DESCRIPTION Rock Type; Colour; Grain Size; Mineralogy Characteristics; Fracture Details; Strength	Weathering	$Is_{(50)}$ A/Ir/D (MPa)	UCS (MPa)	ESTIMATED STRENGTH Is(50) ● - Axial ○ - Diametral EL VL L M H VH EH -0.03 -0.1 -0.3 -1 -3 -10	Defect Spacing (mm) 20 40 100 300 1000	Defect Description (depth, type, angle, shape, roughness, infill)		Graphic Log	Elevation (mAHD)	Depth (m)
	NMLC	48		0		**4.85 m: Phyllite** Dark grey, extremely weathered, very low strength, Rubbled quartz veins *(continued)*	MW XW									
						5.2 m: CORE LOSS (1.37m) Core loss likely attributed to rock quality										
		42		40	6.5	**6.57 m: PHYLLITE** Dark grey, some brown, fine grained, slightly weathered, highly fractured, high strength, foliated, frequent quartz veins, Iron stained	SW					6.76m: VN, 60°, PL, SM, Qz FILLED 6.96m: FC, PL, SM 6.98m: VN, PL, SM, Qz FILLED 7.07m: FL, 30°, PL, SM, CN 7.08m: FL, 30°, PL, SM, CN 7.15-7.19m: VN, Qz 7.20m: JT, PL, SM 7.49m: VN, Qz 7.77m: VN, Qz 7.91-7.99m: JT, 60°, UN, SM, Fe SN 8.01m: JT, 40°, UN, SM, CN 8.05-8.10m: JT, 40°, IR, SM, CN 8.10-8.13m: JT, 40°, IR, SM, CN 8.19m: JT, 45°, IR, RO, Fe FILLED 8.35-8.60m: VN, Qz SN 8.64m: FL, 45°, PL, SM, Fe SN			
		100		20	8.0											
		100		20	8.5											
					9.0	***SAM-01 Terminated at 9.00 m*** ***(Target depth)***										
					9.5											

Remarks:
1. Borehole coordinates obtained using handheld GPS with accuracy +/- 6m.
2. Borehole backfilled with cuttings immediately upon completion of drilling.
3. No groundwater encountered during augering.
4. Ground elevation not recorded.

Logged: **TL**
Logged Date: **19/12/2018**
Checked: **JB**
Checked Date: **8/01/2019**

Log File Name: P:\WP\ADMIN\GROTECH\TENDERS_PROPOSALS_AND_PROJECTS\2247473 NBN SAMSONVALE LANDSLIDE AND GT ASSESSMENT\5_BOREHOLE_LOGS\SAMSONVALE.GPJ

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Grey Scale

Colour Scale

Location		Samsonvale	
Borehole Number		SAM-01	
Box	1	of	1
Depth	3.6m	to	9.0m

Project	National Broadband Network Fixed Wireless
Number	247473
Client	Ericsson



Appendix C
Site photos

Site Pictures
Samsonvale 19/12/2019



Figure 1: Borehole location, facing south west, depicting road and fence



Figure 2: West of the borehole location, facing north, depicting vegetation within the proposed lease area.



Figure 3: Rock outcrop in road cutting along access track approximately 50m south of lease area



Figure 4: Rock outcrop along road ~10m from borehole location



Figure 5: View of lease area, facing north west



Figure 6: View of lease area and drill rig, facing south east

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Appendix C
Site Mapping, Sketches and Photographs



SITE LOCATION PLAN
(~1:2,500)

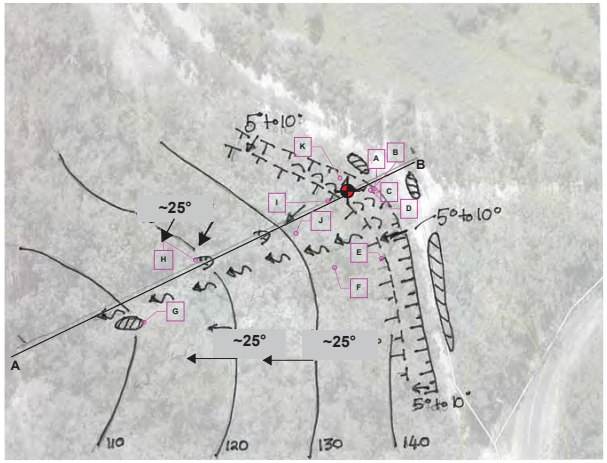
LEGEND:

- Main Lease Area
- Existing Access Track Route (to be upgraded)
- Property Boundary
- Contours from QLD Globe
- Approx. Location of BH Investigation "SAM-01"
- Gate

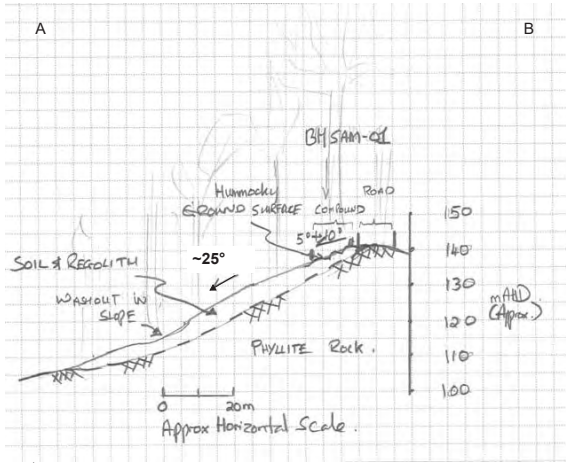
Notes:
1. Inspection completed on 07/03/19
2. Mapping and property boundary limited to area of concern (i.e. plan does not show all features beyond area of concern)

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PROJECT: 4DYB-51-06-SAMS-Samsonvale		DRAWN: MG	DATE: 14/03/2019
CLIENT: Ericsson Australia Pty Ltd			
TITLE: Landslide Risk Assessment Site Mapping		SCALE: AS SHOWN	SHEET SIZE: A3
	PROJECT NO: 247473	REV: A	FIGURE NO: 1 of 5



INSET, SITE MAPPING OF KEY FEATURES, PLAN (~1:750)



INTERPRETED GEOLOGICAL CROSS SECTION

LEGEND:

- Approx. Location of BH Investigation "SAM-01"
- Photograph Location, Orientation & ID
- 30 — Slope Dip Direction (Approx Angle Degrees)
- Gate
- Surface Flow Direction
- Rock Outcrop
- Gradual Break in Slope
- Minor gully
- Sharp Break in Slope (Crest)
- 100 — Contours from QLD Globe

Notes:
1. Inspection completed on 07/03/19
2. Mapping and property boundary limited to area of concern (i.e. plan does not show all features beyond area of concern)
3. Recorded slope angles and locations are approximate only

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PROJECT: 4DYB-51-06-SAMS-Samsonvale		DRAWN: BIT	DATE: 14/03/2019
CLIENT: Ericsson Australia Pty Ltd			
TITLE: Landslide Risk Assessment Site Mapping		SCALE: AS SHOWN	SHEET SIZE: A3
	PROJECT NO: 247473	REV: A	FIGURE NO: 2 of 5



PHOTOGRAPH B. View of the lease area, looking west. Note marked trees, presumably to be removed.



PHOTOGRAPH D. Loose rock and soil of the ground surface in the lease area.



PHOTOGRAPH A. View of the entrance to the site, looking north west.



PHOTOGRAPH C. Another view of the lease area, showing the approximate 5° to 10° slope. Note the slightly hummocky ground.

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CLIENT:	Ericsson Australia Pty Ltd
TITLE:	Landslide Risk Assessment Site Mapping
DRAWN:	MG
DATE:	14/03/2019
SCALE:	NTS
SHEET SIZE:	A3
PROJECT NO:	247473
REV:	A
FIGURE NO:	3 of 5

Note: Refer to Figure 01 & 02 for location and orientation of photographs



PHOTOGRAPH F. Looking down the eroding gully or drainage channel



PHOTOGRAPH H. Example of small washouts in the slope



PHOTOGRAPH E. View of the sharp break in the slope next to the access road, looking south



PHOTOGRAPH G. Rock outcrop in the gully or drainage channel

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CLIENT:	Ericsson Australia Pty Ltd
TITLE:	Landslide Risk Assessment Site Mapping
DRAWN:	MG
DATE:	14/03/2019
SCALE:	NTS
SHEET SIZE:	A3
PROJECT NO:	247473
REV:	A
FIGURE NO:	4 of 5

Note: Refer to Figure 01 & 02 for location and orientation of photographs

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)



PHOTOGRAPH J. View of the slope to the south of the lease, looking west. The slope grading is ~25°



PHOTOGRAPH L. Rock outcrop in the road



PHOTOGRAPH I. Small hole in the slope, south of the lease, probably caused by the roots of a fallen tree



PHOTOGRAPH K. View of the lease area, looking east

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CLIENT:	Ericsson Australia Pty Ltd
TITLE:	Landslide Risk Assessment Site Mapping
DRAWN:	MG
DATE:	14/03/2019
SCALE:	NTS
SHEET SIZE:	A3
PROJECT NO:	247473
REV:	A
FIGURE NO:	5 of 5

Note: Refer to Figure 01 & 02 for location and orientation of photographs

Appendix D
Excerpt from AGS 2007

PRACTICE NOTE GUIDELINES FOR LANDSLIDE RISK MANAGEMENT 2007

Importance Level of Structure	Explanation	Examples (Regulatory authorities may designate any structure to any classification type when local conditions make such desirable)
1	Buildings or structures generally presenting a low risk to life and property (including other property).	Farm buildings. Isolated minor storage facilities. Minor temporary facilities. Towers in rural situations.
2	Buildings and structures not covered by Importance Levels 1, 3 or 4.	Low-rise residential construction. Buildings and facilities below the limits set for Importance Level 3.
3	Buildings or structures that as a whole may contain people in crowds, or contents of high value to the community, or that pose hazards to people in crowds.	Buildings and facilities where more than 300 people can congregate in one area. Buildings and facilities with primary school, secondary school or day-care facilities with capacity greater than 250. Buildings and facilities for colleges or adult education facilities with a capacity greater than 500. Health care facilities with a capacity of 50 or more residents but no having surgery or emergency treatment facilities. Jails and detention facilities. Any occupancy with an occupant load greater than 5,000. Power generating facilities, water treatment and waste water treatment facilities, any other public utilities not included in Importance Level 4. Buildings and facilities not included in Importance Level 4 containing hazardous materials capable of causing hazardous conditions that do not extend beyond property boundaries.
4	Buildings or structures that are essential to post-disaster recovery, or with significant post-disaster functions, or that contain hazardous materials.	Buildings and facilities designated as essential facilities. Buildings and facilities with special post-disaster functions. Medical emergency or surgery facilities. Emergency service facilities: fire, rescue, police station and emergency vehicle garages. Utilities required as back-up for buildings and facilities of Importance Level 4. Designated emergency shelters. Designated emergency centres and ancillary facilities. Buildings and facilities containing hazardous (toxic or explosive) materials in sufficient quantities capable of causing hazardous conditions that extend beyond property boundaries.

(from BCA Guidelines)

Practitioner – A specialist Geotechnical Engineer or Engineering Geologist who is degree qualified, is a member of a professional institute and who has achieved chartered professional status – being either Chartered Professional Engineer (CPEng) within the Institution of Engineers Australia, Chartered Professional Geologist (CPGeo) within the Australasian Institute of Mining & Metallurgy, or Registered Professional Geoscientist (RPGeo) within the Australian Institute of Geoscientists – specifically with Landslide Risk Management as a core competency.

A Practitioner will include persons qualified under the Institution of Engineers Australia NPER – LRM register.

It would normally be required that the Practitioner can demonstrate an appropriate minimum period of experience in the practice of landslide risk assessment and management in the geographic region, or can demonstrate relevant experience in similar geological settings.

Regulator – The regulatory authority [Federal Government/ State Government/ Instrumentality/ Regional/Local.

PRACTICE NOTE GUIDELINES FOR LANDSLIDE RISK MANAGEMENT 2007

APPENDIX C: LANDSLIDE RISK ASSESSMENT

QUALITATIVE TERMINOLOGY FOR USE IN ASSESSING RISK TO PROPERTY

QUALITATIVE MEASURES OF LIKELIHOOD

Approximate Annual Probability		Implied Indicative Landslide Recurrence Interval		Description	Descriptor	Level
Indicative Value	Notional Boundary					
10^{-1}	$5x10^{-2}$	10 years	20 years	The event is expected to occur over the design life.	ALMOST CERTAIN	A
10^{-2}	$5x10^{-3}$	100 years	200 years	The event will probably occur under adverse conditions over the design life.	LIKELY	B
10^{-3}	$5x10^{-4}$	1000 years	2000 years	The event could occur under adverse conditions over the design life.	POSSIBLE	C
10^{-4}	$5x10^{-5}$	10,000 years	20,000 years	The event might occur under very adverse circumstances over the design life.	UNLIKELY	D
10^{-5}	$5x10^{-6}$	100,000 years	200,000 years	The event is conceivable but only under exceptional circumstances over the design life.	RARE	E
10^{-6}		1,000,000 years		The event is inconceivable or fanciful over the design life.	BARELY CREDIBLE	F

Note: (1) The table should be used from left to right; use Approximate Annual Probability or Description to assign Descriptor, not *vice versa*.

QUALITATIVE MEASURES OF CONSEQUENCES TO PROPERTY

Approximate Cost of Damage		Description	Descriptor	Level
Indicative Value	Notional Boundary			
200%	100%	Structure(s) completely destroyed and/or large scale damage requiring major engineering works for stabilisation. Could cause at least one adjacent property major consequence damage.	CATASTROPHIC	1
60%	40%	Extensive damage to most of structure, and/or extending beyond site boundaries requiring significant stabilisation works. Could cause at least one adjacent property medium consequence damage.	MAJOR	2
20%	10%	Moderate damage to some of structure, and/or significant part of site requiring large stabilisation works. Could cause at least one adjacent property minor consequence damage.	MEDIUM	3
5%	1%	Limited damage to part of structure, and/or part of site requiring some reinstatement stabilisation works.	MINOR	4
0.5%		Little damage. (Note for high probability event (Almost Certain), this category may be subdivided at a notional boundary of 0.1%. See Risk Matrix.)	INSIGNIFICANT	5

Notes: (2) The Approximate Cost of Damage is expressed as a percentage of market value, being the cost of the improved value of the unaffected property which includes the land plus the unaffected structures.

(3) The Approximate Cost is to be an estimate of the direct cost of the damage, such as the cost of reinstatement of the damaged portion of the property (land plus structures), stabilisation works required to render the site to tolerable risk level for the landslide which has occurred and professional design fees, and consequential costs such as legal fees, temporary accommodation. It does not include additional stabilisation works to address other landslides which may affect the property.

(4) The table should be used from left to right; use Approximate Cost of Damage or Description to assign Descriptor, not vice versa

PRACTICE NOTE GUIDELINES FOR LANDSLIDE RISK MANAGEMENT 2007

APPENDIX C: – QUALITATIVE TERMINOLOGY FOR USE IN ASSESSING RISK TO PROPERTY (CONTINUED)

QUALITATIVE RISK ANALYSIS MATRIX – LEVEL OF RISK TO PROPERTY

LIKELIHOOD		CONSEQUENCES TO PROPERTY (With Indicative Approximate Cost of Damage)				
	Indicative Value of Approximate Annual Probability	1: CATASTROPHIC 200%	2: MAJOR 60%	3: MEDIUM 20%	4: MINOR 5%	5: INSIGNIFICANT 0.5%
A – ALMOST CERTAIN	10^{-1}	VH	VH	VH	H	M or **L** (5)
B - LIKELY	10^{-2}	VH	VH	H	M	**L**
C - POSSIBLE	10^{-3}	VH	H	M	M	**VL**
D - UNLIKELY	10^{-4}	H	M	**L**	**L**	**VL**
E - RARE	10^{-5}	M	**L**	**L**	**VL**	**VL**
F - BARELY CREDIBLE	10^{-6}	**L**	**VL**	**VL**	**VL**	**VL**

Notes: (5) For Cell A5, may be subdivided such that a consequence of less than 0.1% is Low Risk.
(6) When considering a risk assessment it must be clearly stated whether it is for existing conditions or with risk control measures which may not be implemented at the current time.

RISK LEVEL IMPLICATIONS

Risk Level		Example Implications (7)
VH	VERY HIGH RISK	Unacceptable without treatment. Extensive detailed investigation and research, planning and implementation of treatment options essential to reduce risk to Low; may be too expensive and not practical. Work likely to cost more than value of the property.
H	HIGH RISK	Unacceptable without treatment. Detailed investigation, planning and implementation of treatment options required to reduce risk to Low. Work would cost a substantial sum in relation to the value of the property.
M	MODERATE RISK	May be tolerated in certain circumstances (subject to regulator's approval) but requires investigation, planning and implementation of treatment options to reduce the risk to Low. Treatment options to reduce to Low risk should be implemented as soon as practicable.
L	LOW RISK	Usually acceptable to regulators. Where treatment has been required to reduce the risk to this level, ongoing maintenance is required.
VL	VERY LOW RISK	Acceptable. Manage by normal slope maintenance procedures.

Note: (7) The implications for a particular situation are to be determined by all parties to the risk assessment and may depend on the nature of the property at risk; these are only given as a general guide.

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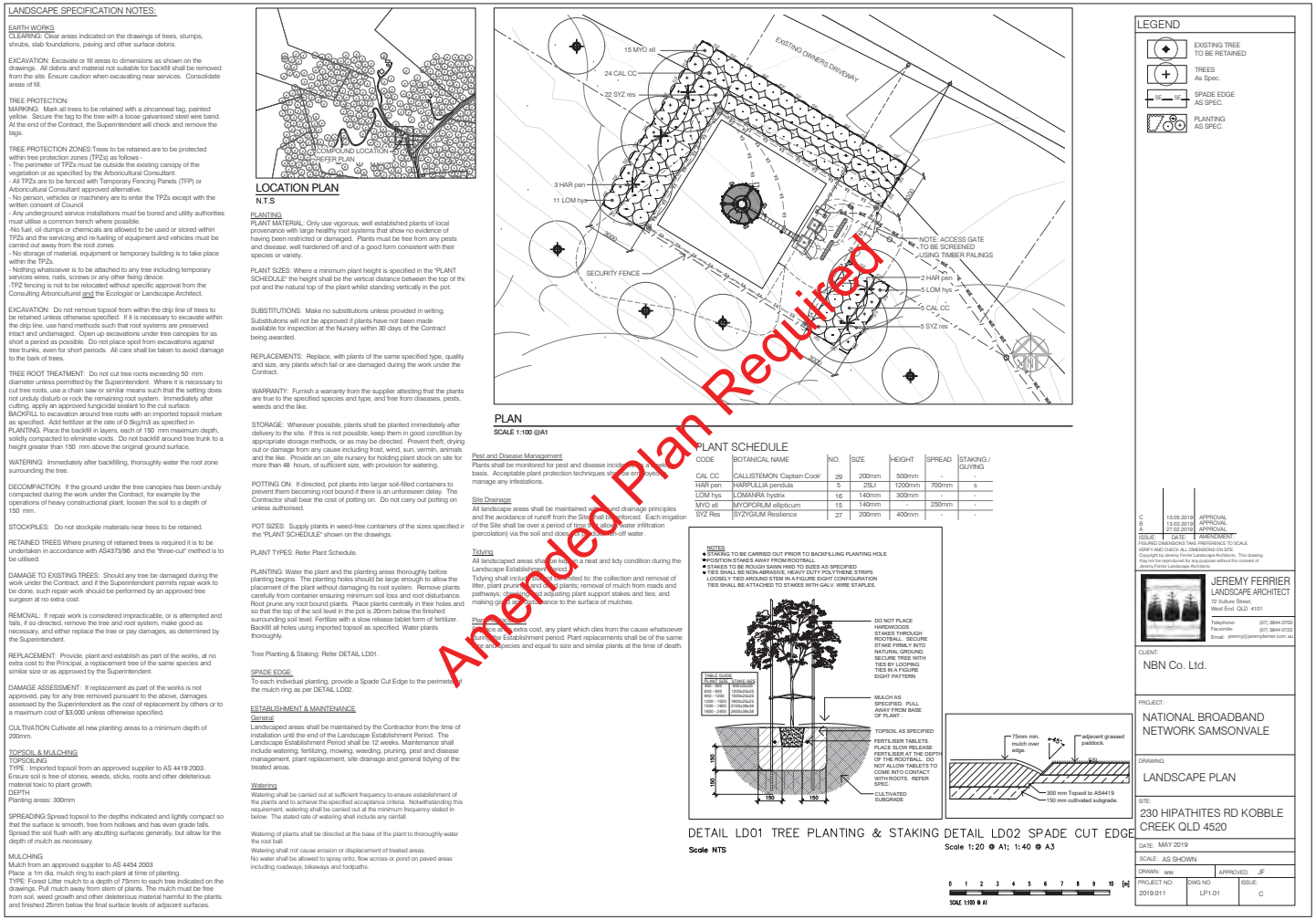
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ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

#5 Plan to be Amended - Landscaping Plan



LANDSCAPE SPECIFICATION NOTES:

EARTH WORKS
CLEARING: Clear areas indicated on the drawings of trees, stumps, shrubs, slab foundations, paving and other surface debris.

EXCAVATION: Excavate or fill areas to dimensions as shown on the drawings. All debris and material not suitable for backfill shall be removed from the site. Ensure caution when excavating near services. Consolidate areas of fill.

TREE PROTECTION:
MARKING: Mark all trees to be retained with a zincanneal tag, painted yellow. Secure the tag to the tree with a loose galvanised steel wire band. At the end of the Contract, the Superintendent will check and remove the tags.

TREE PROTECTION ZONES:Trees to be retained are to be protected within tree protection zones (TPZs) as follows -
- The perimeter of TPZs must be outside the existing canopy of the vegetation or as specified by the Arboricultural Consultant.
- All TPZs are to be fenced with Temporary Fencing Panels (TFP) or Arboricultural Consultant approved alternative.
- No person, vehicles or machinery are to enter the TPZs except with the written consent of Council
- Any underground service installations must be bored and utility authorities must utilise a common trench where possible.
-No fuel, oil dumps or chemicals are allowed to be used or stored within TPZs and the servicing and re-fueling of equipment and vehicles must be carried out away from the root zones.
- No storage of material, equipment or temporary building is to take place within the TPZs.
- Nothing whatsoever is to be attached to any tree including temporary services wires, nails, screws or any other fixing device.
-TPZ fencing is not to be relocated without specific approval from the Consulting Arboriculturist and the Ecologist or Landscape Architect.

EXCAVATION: Do not remove topsoil from within the drip line of trees to be retained unless otherwise specified. If it is necessary to excavate within the drip line, use hand methods such that root systems are preserved intact and undamaged. Open up excavations under tree canopies for as short a period as possible. Do not place spoil from excavations against tree trunks, even for short periods. All care shall be taken to avoid damage to the bark of trees.

TREE ROOT TREATMENT: Do not cut tree roots exceeding 50 mm diameter unless permitted by the Superintendent. Where it is necessary to cut tree roots, use a chain saw or similar means such that the setting does not unduly disturb or rock the remaining root system. Immediately after cutting, apply an approved fungicidal sealant to the cut surface.
BACKFILL to excavation around tree roots with an imported topsoil mixture as specified. Add fertilizer at the rate of 0.5kg/m3 as specified in PLANTING. Place the backfill in layers, each of 150 mm maximum depth, solidly compacted to eliminate voids. Do not backfill around tree trunk to a height greater than 150 mm above the original ground surface.

WATERING: Immediately after backfilling, thoroughly water the root zone surrounding the tree.

DECOMPACTION: If the ground under the tree canopies has been unduly compacted during the work under the Contract, for example by the operations of heavy constructional plant, loosen the soil to a depth of 150 mm.

STOCKPILES: Do not stockpile materials near trees to be retained.

RETAINED TREES Where pruning of retained trees is required it is to be undertaken in accordance with AS4373/96 and the "three-cut" method is to be utilised.

DAMAGE TO EXISTING TREES: Should any tree be damaged during the work under the Contract, and if the Superintendent permits repair work to be done, such repair work should be performed by an approved tree surgeon at no extra cost.

REMOVAL: If repair work is considered impracticable, or is attempted and fails, if so directed, remove the tree and root system, make good as necessary, and either replace the tree or pay damages, as determined by the Superintendent.

REPLACEMENT: Provide, plant and establish as part of the works, at no extra cost to the Principal, a replacement tree of the same species and similar size or as approved by the Superintendent.

DAMAGE ASSESSMENT: If replacement as part of the works is not approved, pay for any tree removed pursuant to the above, damages assessed by the Superintendent as the cost of replacement by others or to a maximum cost of $3,000 unless otherwise specified.

CULTIVATION Cultivate all new planting areas to a minimum depth of 200mm.

TOPSOIL & MULCHING
TOPSOILING
TYPE - Imported topsoil from an approved supplier to AS 4419 2003. Ensure soil is free of stones, weeds, sticks, roots and other deleterious material toxic to plant growth.
DEPTH
Planting areas: 300mm

SPREADING:Spread topsoil to the depths indicated and lightly compact so that the surface is smooth, free from hollows and has even grade falls. Spread the soil flush with any abutting surfaces generally, but allow for the depth of mulch as necessary.

MULCHING
Mulch from an approved supplier to AS 4454 2003
Place a 1m dia. mulch ring to each plant at time of planting.
TYPE: Forest Litter mulch to a depth of 75mm to each tree indicated on the drawings. Pull mulch away from stem of plants. The mulch must be free from soil, weed growth and other deleterious material harmful to the plants and finished 25mm below the final surface levels of adjacent surfaces.

LOCATION PLAN
N.T.S

PLANTING
PLANT MATERIAL: Only use vigorous, well established plants of local provenance with large healthy root systems that show no evidence of having been restricted or damaged. Plants must be free from any pests and disease, well hardened off and of a good form consistent with their species or variety.

PLANT SIZES: Where a minimum plant height is specified in the 'PLANT SCHEDULE' the height shall be the vertical distance between the top of the pot and the natural top of the plant whilst standing vertically in the pot.

SUBSTITUTIONS: Make no substitutions unless provided in writing. Substitutions will not be approved if plants have not been made available for inspection at the Nursery within 30 days of the Contract being awarded.

REPLACEMENTS: Replace, with plants of the same specified type, quality and size, any plants which fail or are damaged during the work under the Contract.

WARRANTY: Furnish a warranty from the supplier attesting that the plants are true to the specified species and type, and free from diseases, pests, weeds and the like.

STORAGE: Wherever possible, plants shall be planted immediately after delivery to the site. If this is not possible, keep them in good condition by appropriate storage methods, or as may be directed. Prevent theft, drying out or damage from any cause including frost, wind, sun, vermin, animals and the like. Provide an on site nursery for holding plant stock on site for more than 48 hours, of sufficient size, with provision for watering.

POTTING ON: If directed, pot plants into larger soil-filled containers to prevent them becoming root bound if there is an unforeseen delay. The Contractor shall bear the cost of potting on. Do not carry out potting on unless authorised.

POT SIZES: Supply plants in weed-free containers of the sizes specified in the "PLANT SCHEDULE" shown on the drawings.

PLANT TYPES: Refer Plant Schedule.

PLANTING: Water the plant and the planting areas thoroughly before planting begins. The planting holes should be large enough to allow the placement of the plant without damaging its root system. Remove plants carefully from container ensuring minimum soil loss and root disturbance. Root prune any root bound plants. Place plants centrally in their holes and so that the top of the soil level in the pot is 20mm below the finished surrounding soil level. Fertilize with a slow release tablet form of fertilizer. Backfill all holes using imported topsoil as specified. Water plants thoroughly.

Tree Planting & Staking: Refer DETAIL LD01.

SPADE EDGE:
To each individual planting, provide a Spade Cut Edge to the perimeter of the mulch ring as per DETAIL LD02.

ESTABLISHMENT & MAINTENANCE
General
Landscaped areas shall be maintained by the Contractor from the time of installation until the end of the Landscape Establishment Period. The Landscape Establishment Period shall be 12 weeks. Maintenance shall include watering, fertilizing, mowing, weeding, pruning, pest and disease management, plant replacement, site drainage and general tidying of the treated areas.

Watering
Watering shall be carried out at sufficient frequency to ensure establishment of the plants and to achieve the specified acceptance criteria. Notwithstanding this requirement, watering shall be carried out at the minimum frequency stated in below. The stated rate of watering shall include any rainfall.

Watering of plants shall be directed at the base of the plant to thoroughly water the root ball.
Watering shall not cause erosion or displacement of treated areas.
No water shall be allowed to spray onto, flow across or pond on paved areas including roadways, bikeways and footpaths.

PLAN
SCALE 1:100 @A1

Pest and Disease Management
Plants shall be monitored for pest and disease incidence on a regular basis. Acceptable plant protection techniques shall be employed to manage any infestations.

Site Drainage
All landscape areas shall be maintained with good drainage principles and the avoidance of runoff from the Site shall be enforced. Each irrigation of the Site shall be over a period of time that allows water infiltration (percolation) via the soil and does not result in run-off water.

Tidying
All landscaped areas shall be kept in a neat and tidy condition during the Landscape Establishment Period.
Tidying shall include but not be limited to: the collection and removal of litter, plant prunings and dead plants; removal of mulch from roads and pathways; cleaning and adjusting plant support stakes and ties; and making good any disturbance to the surface of mulches.

Replacements
Replace at no extra cost, any plant which dies from the cause whatsoever during the Establishment period. Plant replacements shall be of the same or similar species and equal to size and similar plants at the time of death.

PLANT SCHEDULE

CODE	BOTANICAL NAME	NO.	SIZE	HEIGHT	SPREAD	STAKING / GUYING
CAL CC	CALLISTEMON 'Captain Cook'	29	200mm	500mm	-	-
HAR pen	HARPULLIA pendula	5	25Lt	1200mm	700mm	s
LOM hys	LOMANRA hystrix	16	140mm	300mm	-	-
MYO ell	MYOPORUM ellipticum	15	140mm	-	250mm	-
SYZ Res	SYZYGIUM Resilience	27	200mm	400mm	-	-

DETAIL LD01 TREE PLANTING & STAKING
Scale NTS

DETAIL LD02 SPADE CUT EDGE
Scale 1:20 @ A1; 1:40 @ A3

0 1 2 3 4 5 6 7 8 9 10 [m]
SCALE 1:100 @ A1

LEGEND
EXISTING TREE TO BE RETAINED
TREES As Spec.
SPADE EDGE AS SPEC.
PLANTING AS SPEC.

ISSUE	DATE	AMENDMENT
C	13.06.2019	APPROVAL
B	13.03.2019	APPROVAL
A	27.02.2019	APPROVAL

FIGURED DIMENSIONS TAKE PREFERENCE TO SCALE.
VERIFY AND CHECK ALL DIMENSIONS ON SITE.
Copyright by Jeremy Ferrier Landscape Architects. This drawing is the property of the author and may not be used without the consent of Jeremy Ferrier Landscape Architects.

JEREMY FERRIER LANDSCAPE ARCHITECT
72 Vulture Street, West End QLD 4101
Telephone: (07) 3844 0700
Facsimile: (07) 3844 0722
Email: jeremy@jeremyferrier.com.au

CLIENT: NBN Co. Ltd.
PROJECT: NATIONAL BROADBAND NETWORK SAMSONVALE
DRAWING: LANDSCAPE PLAN
SITE: 230 HIPATHITES RD KOBBLE CREEK QLD 4520
DATE: MAY 2019
SCALE: AS SHOWN
DRAWN: ww | APPROVED: JF
PROJECT NO: 2019.011 | DWG NO: LP1.01 | ISSUE: C

Amended Plan Required

Not Approved DA/37146/2018/V2U 20/05/2019

RA6-N

Queensland Government

Department of
State Development, Manufacturing, Infrastructure and Planning

Our reference: 1811-8286 SRA
Your reference: DA/37146/2018/V2U
Applicant reference: NBN-4NIZ-4DYB-5106-SAMSONVALE

30 November 2018

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510
mbrc@moretonbay.qld.gov.au

Attention: Mr Clancy Sloan

Dear Mr Sloan

Referral agency response—with conditions
(Given under section 56 of the *Planning Act 2016*)

The development application described below was properly referred to the Department of State Development, Manufacturing, Infrastructure and Planning on 7 November 2018.

Applicant details

Applicant name:	Nbn Co. c/- Aurecon Australasia Pty Ltd.
Applicant contact details:	Locked Bag 331 Brisbane QLD 4001 melita.brown@aurecongroup.com

Location details

Street address:	230 Hipathites Road, Kobble Creek
Real property description:	Lot 2 on RP162985
Local government area:	Moreton Bay Regional Council

Application details

Development permit	Material change of use for telecommunications facility

South East Queensland (North) regional office
Mike Ahern Building, Level 3, 12 First Avenue, Maroochydore
PO Box 1129, Maroochydore QLD 4558

1811-8286 SRA

Referral triggers

The development application was referred to the department under the following provisions of the Planning Regulation 2017:

- 10.3.4.3.1 Clearing native vegetation

Conditions
Under section 56(1)(b)(i) of the *Planning Act 2016* (the Act), the conditions set out in Attachment 1 must be attached to any development approval.

Reasons for decision to impose conditions
The department must provide reasons for the decision to impose conditions. These reasons are set out in Attachment 2.

Advice to the applicant
The department offers advice about the application to the applicant—see Attachment 3.

Approved plans and specifications
The department requires that the plans and specifications set out below and enclosed must be attached to any development approval.

Drawing/report title	Prepared by	Date	Reference no.	Version/issue
Aspect of development: Material change of use				
Technical Agency Response (Vegetation) Plan	Queensland Government	15 November 2018	TARP 1811-8286 SRA	-

A copy of this response has been sent to the applicant for their information.

For further information please contact Candace Mitchell, Senior Planning Officer, on 5352 9708 or via email SEQNorthSARA@dsdmip.qld.gov.au who will be pleased to assist.

Yours sincerely



Garth Nolan
Manager (Planning)

cc Nbn Co. c/- Aurecon Australasia Pty Ltd., melita.brown@aurecongroup.com

enc Attachment 1—Conditions to be imposed
Attachment 2—Reasons for decision to impose conditions
Attachment 3—Advice to the applicant
Approved plans and specifications

1811-8286 SRA

Attachment 1—Conditions to be imposed

No.	Conditions	Condition timing
Development permit for material change of use		
10.3.4.3.1 – Clearing native vegetation—The chief executive administering the *Planning Act 2016* nominates the Director-General of the Department of Natural Resources, Mines and Energy to be the enforcement authority for the development to which this development approval relates for the administration and enforcement of any matter relating to the following condition(s):		
1.	The clearing of vegetation under this development approval is limited to the area identified as Area A as shown on attached Technical Agency Response (Vegetation) Plan (TARP) 1811-8286 SRA dated 15 November 2018.	At all times
2.	Any person(s) engaged or employed to carry out the clearing of vegetation under this development approval must be provided with a full copy of this development approval, and must be made aware of the full extent of clearing authorised by this development approval.	At all times

1811-8286 SRA

Attachment 2—Reasons for decision to impose conditions

The reasons for this decision are:

- To ensure the development minimises clearing of native vegetation and is restricted to the area identified on the Technical Agency Response (Vegetation) Plan (TARP).
- To ensure any person(s) carrying out clearing of native vegetation is compliant with the development approval.

Decision

- The development application is for material change of use for a telecommunications facility.
- The proposed development site is identified as containing vegetation shown on the vegetation management supporting mapping as Category B area containing least concern regional ecosystems.
- Clearing of vegetation as a result of the development, including essential management (e.g. firebreaks), will cover an area of 0.2 hectares.
- Date of the referral agency response, with conditions: 30 November 2018.

Relevant material

- Submitted development application material
- Section 22A determination provided by the Department of Natural Resources, Mines and Energy on 16 October 2018
- State Development Assessment Provisions published by the Department of State Development, Manufacturing, Infrastructure and Planning, version 2.3
- *Planning Act 2016*
- Planning Regulation 2017

1811-8286 SRA

Attachment 3—Advice to the applicant

General advice	
1.	Clearing of vegetation has the potential to disturb the roots of the trees of proposed retained vegetation thereby resulting in the death of trees not approved to be cleared under this development approval. It is recommended clearing and excavation activities be undertaken in accordance with the 'Australian Standards for the Protection of Trees on Development Sites (AS4970-2009)' to avoid any consequential unauthorised clearing.

GE78-N

Queensland Government

Department of
State Development, Manufacturing, Infrastructure and Planning

Department of State Development, Manufacturing, Infrastructure and Planning
Statement of reasons for application 1811-8286 SRA
(Given under section 56 of the *Planning Act 2016*)

Departmental role:	Referral agency

Applicant details

Applicant name:	Nbn Co. c/- Aurecon Australasia Pty Ltd.
Applicant contact details:	Locked Bag 331 Brisbane QLD 4001 melita.brown@aurecongroup.com

Location details

Street address:	230 Hipathites Road, Kobble Creek
Real property description:	Lot 2 on RP162985
Local government area:	Moreton Bay Regional Council

Development details

Development permit	Material change of use for telecommunications facility

Assessment matters

Aspect of development requiring code assessment	Applicable codes
Planning Regulation 2017, Schedule 10, Part 3, Division 4, Table 3, Item 1 – Clearing native vegetation	State Development Assessment Provisions (SDAP), version 2.3, State Code 16: Native vegetation clearing

Reasons for the department's decision
The reasons for the decision are:

- To ensure the development minimises clearing of native vegetation and is restricted to the area identified on the Technical Agency Response (Vegetation) Plan (TARP).
- To ensure any person(s) carrying out clearing of native vegetation is compliant with the development approval.

Decision

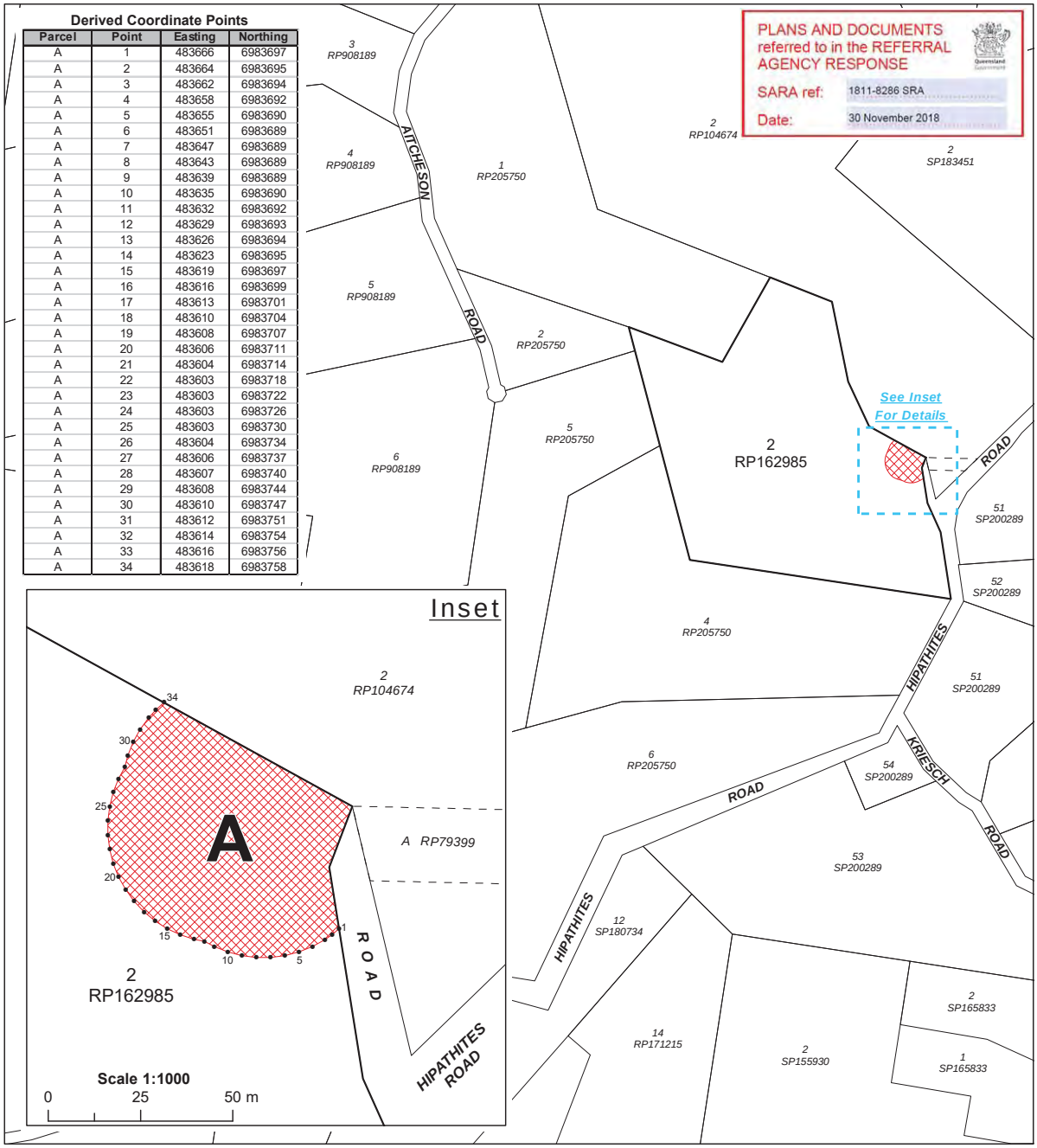
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South East Queensland (North) regional office
Mike Ahern Building, Level 3, 12 First Avenue, Maroochydore
PO Box 1129, Maroochydore QLD 4558

1811-8286 SRA

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- State Development Assessment Provisions published by the Department of State Development, Manufacturing, Infrastructure and Planning, version 2.3
- *Planning Act 2016*
- Planning Regulation 2017



Note: *The property boundaries shown on this plan are* ***APPROXIMATE ONLY.*** *They are* ***NOT*** *an accurate representation of the legal boundaries.*
Note: *Derived Coordinate Points are provided to aid in the location of the Technical Agency Response boundaries. Responsibility for locating these boundaries lies solely with the landholder and delegated clearing contractor(s).*
Note: *All Derived Coordinate Points continue sequentially when labels are missing.*
Note: *This is a colour plan and should be reproduced in colour.*
Note: This plan must be read in conjunction with Technical Agency Response 1811-8286-SRA.

Catherine Louise Smit
306 Aitcheson Road,
Kobble Creek. 4250

19tharch 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

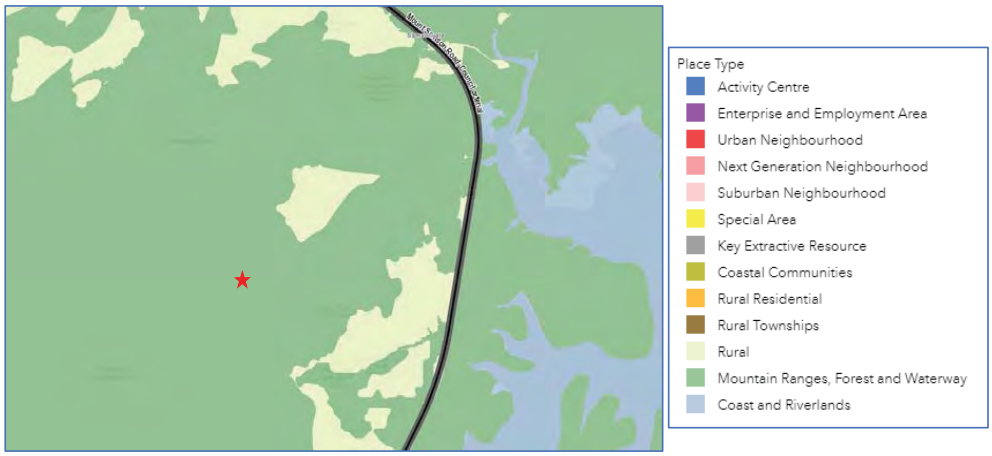
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location “restricts” the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than “minor” clearing and “trimming”.

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council’s planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council’s planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

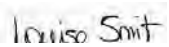
The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure or amend the proposal to be fully compliant with the requirements of its planning scheme .

Should you require any further information about this submission I/we can be contacted on 32899164 or 0438899164

Yours faithfully,



Catherine Louise Smit

CHEYNE CIKOJA
251 HIPATHITES RD
KOBBLE CREEK
QLD, 4520

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
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The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

1. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

*The purpose of the **Rural zone** code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.

0466 998 89

Yours faithfully,

CHEYNE CIKOJA.

Chrystiene Hetherman
222 Hipathites Road
Kobble Creek 4520

19 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

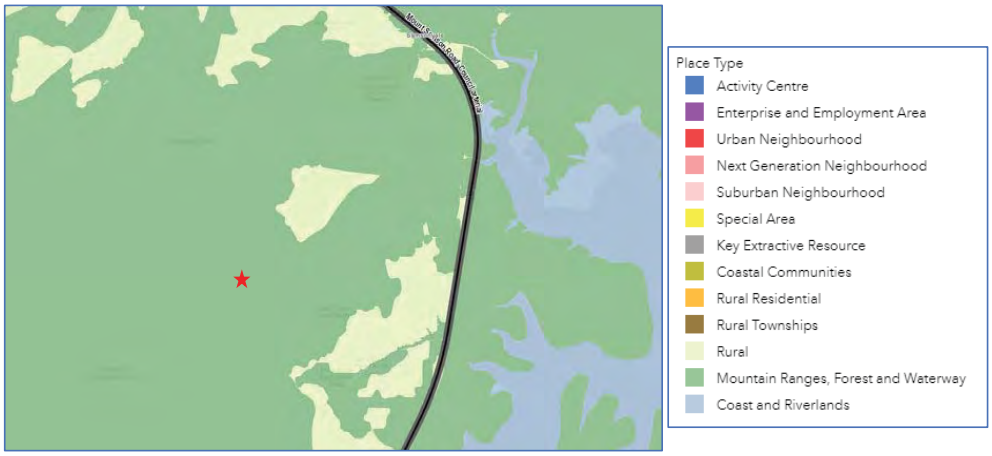
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

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1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

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Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

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The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

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e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction of a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

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Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
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  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
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- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

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Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Coments from Chrystiene Hetherman property owner lot 2 rp104674

The visual impact of the tower being 51 meters high and under 10 meters from the northern boundary conflicts with the requirement of the rural zone code item K **"development does not result in adverse or Nuisance impacts on adjoining properties or the wider rural environment.''**

The nuisance to our rural way of life is that there is no screening that can hide a 50 metre tall tower that is 3 meters at its base and less than the required 10 meters from the property entry gate at 222 Hipathites rd which is the adjoining northern boundary.

As mentioned earlier the development applications fails to meet the required 3 meters of dense screening. The dense screening that has been offered in the revised landscaping plan, at only one meter wide and is an to attempt to appease the requirement rather than to provide a satisfactory out come

In the photo provided by Aurecon on page 5, the minimum of 500m2 of trees and scrub that will be removed, including the 21 trees to be removed are still in shot and are being used to hide the overall impact, of not only the height of the tower but does not show ground or aerial equipment listed in the development application. Therefore this photo montage misrepresents the reality of the overall impact of the tower to the northern boundary.

I have attached a photograph taken at the same location as the photo supplied by the NBN showing a White motor vehicle at the proposed location of the tower. The second Photo shows a truer indication of the visual impact of the ground Buildings caused by this development. I have deleted the trees that will be removed and added a representation of the tower. The tower representation stops at the current tree line, the tower will be at least twice the tree line height.

Before





After

Dept of State development, manufacturing, infrastructure and planning response dated 15 November 2018 ref number TARP 1811-8286 SRA states that the area identified as area A is the allowable area to be cleared of vegetation, this area as stated is .02 of a hectare which is an area of 2000 m2. This is in direct conflict with the Rural Zone Code.

The overall outcomes put forward in support of the NBN, proposed Fixed Wireless Network is the guarantee of fast internet. It has been recently reported that the network is not able to provide the speeds suggested in the planning report, It has also been reported that the ACCC in investigating NBN CO for failing to supply basic internet speeds and is considering imposing fines. The council has an obligation to protect the Rural Zone yet this development is in breach of the Rural Zone Codes and the Strategic Framework and will not be able to fulfil its overall outcome.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I/we can be contacted on

stevechrys222@hotmail.com or 0422 864 549

Yours faithfully,

Chrystiene Hetherman

Danial Hetherman
11 Moonya street
Kingaroy 4610

17 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

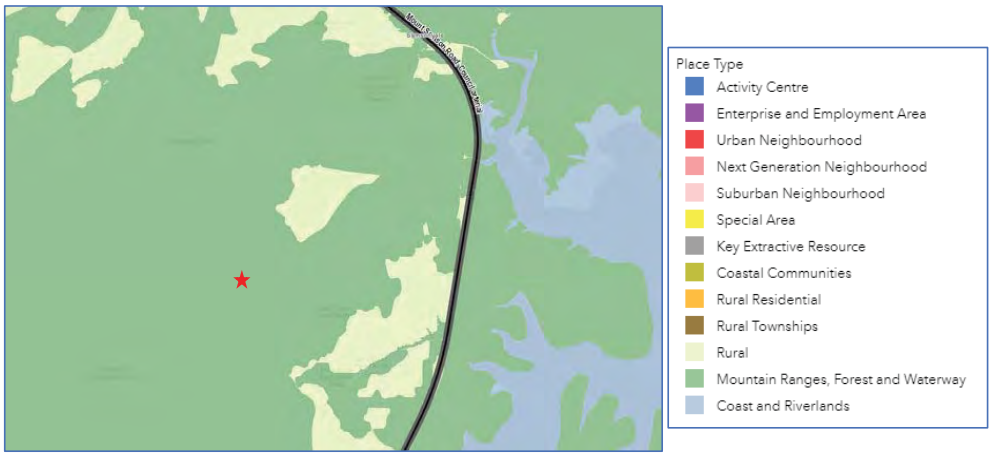
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location “restricts” the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than “minor” clearing and “trimming”.

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council’s planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council’s planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on 0425131467 or dandan289@live.com

Yours faithfully,

Danial Hetherman
Property owner
222 hipathites rd Kobble Creek

Darryl Clarke
96 Kriesch Road
Samsonvale Qld 4520

19 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
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- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

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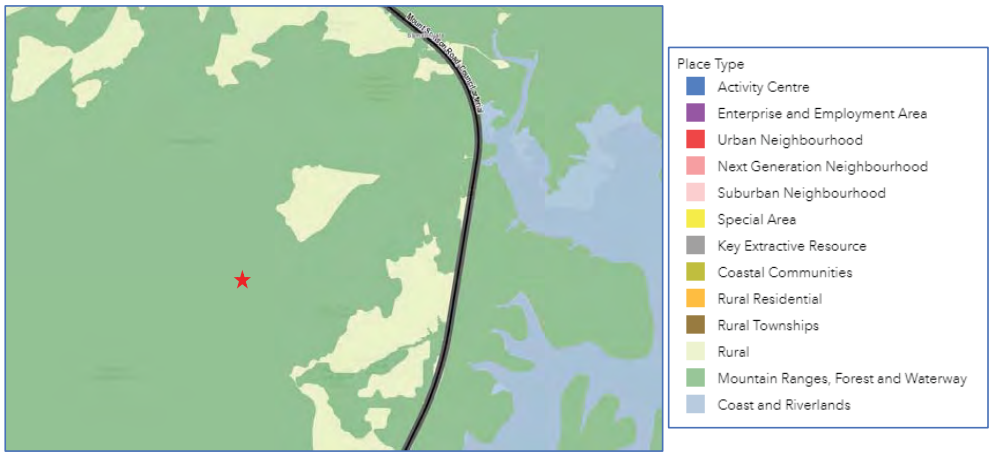
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



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> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
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The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

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Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

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d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

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a. A wide range of rural uses, as identified in the table below, are established.

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i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

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Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
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- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
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  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location “restricts” the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than “minor” clearing and “trimming”.

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council’s planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council’s planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Yours faithfully,

D Clarke

Darryl Clarke

From: DONNA CLARICE MERRITT
To: MBRC Incoming Mail
Subject: Attention: Clancy Sloan NBN Case #DA/37146/2018/V2U
Date: Monday, 18 March 2019 7:37:54 AM

18.03.19 David and Donna Merritt
230 Hipathites Road
Kobble Creek
QLD, 4520
Moreton Bay Regional Council
Attention: CLANCY SLOAN
DA/37146/2018/V2U
230 Hipathites Road, Kobble Creek, QLD, 4520 (Lot 2 RP 162985)

We as the land owner's to where this NBN Facility is being installed, would like to state that we "Fully Support This Proposal" as out "ADSL" service is of a very poor quality and has been for many years in our area.
Improved Broadband is a significant priority in this area with many people, businesses currently having insufficient and low quality "ADSL" Broadband options. The NBN Fixed Wireless facility offers speeds of 50Mbps downloads and 20Mbps upload, which will offer a signifficant improvement to the current services.
We understand that the site for the NBN facility is ideally suited to meeting the required NBN radio coverageand service levels, whilst minimising the impact on the surrounding landscape.

Regards

David and Donna Merritt

EMILY CIKOJA
251 HIPATHITES ROAD
KOBBLE CREEK
QLD 4520

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

*The purpose of the **Rural zone** code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
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The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.
0478 900 977

Yours faithfully,

EMILY CIKOJA.

Scanned By:TYRRELL@MBRCDOM On: 19/03/2019 PM Moreton Bay Regional Council

Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

G. J. GOEBEL
70 SADDLEBACK DVE
DAYBORO
4521

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
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The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

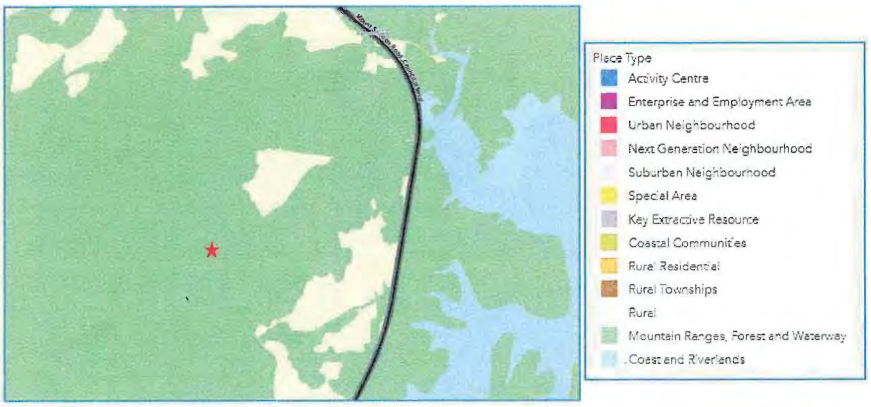
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A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



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The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.
0412 932288

Yours faithfully,
Gordon J. Goebel
Gordon J. Goebel

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

MRS. L. Goebel-Brown
70 Saddleback Drive
Dayboro Q 4521

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

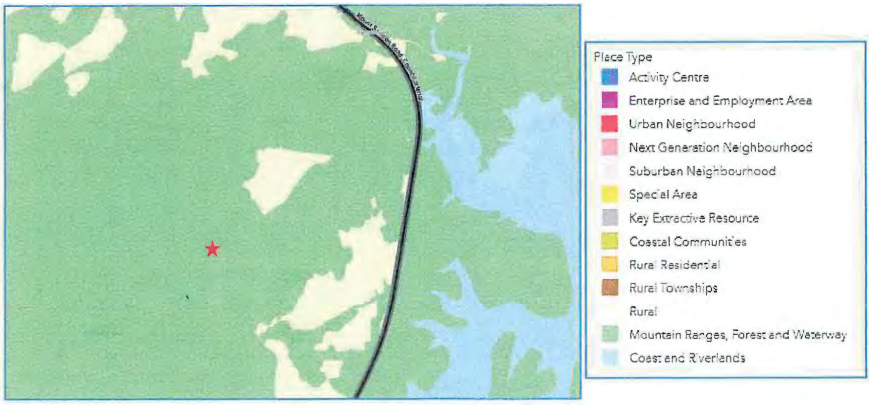
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

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Residential development will be in the form of dispersed dwellings and farm buildings ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
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d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

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   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
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     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
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   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
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- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



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One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.
0448 932 436

Yours faithfully,
L Goebel-Brown
L. Goebel-Brown.

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

TOM & PAT HEIGHWAY.
198 HIPATHITES RD.
KOBBLE CREEK.
4520

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

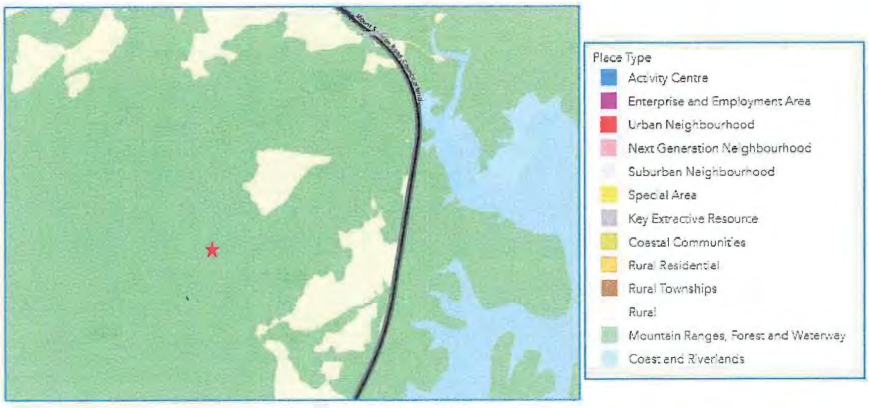
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

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Residential development will be in the form of dispersed dwellings and farm buildings ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.

0405 706 214

Yours faithfully,

J. E. Heighway.

P. Heighway.

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ.ID:

Ann Hetherman,
222, Hipathites Road,
Kobble Creek,
QLD 4520

18th March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

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ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

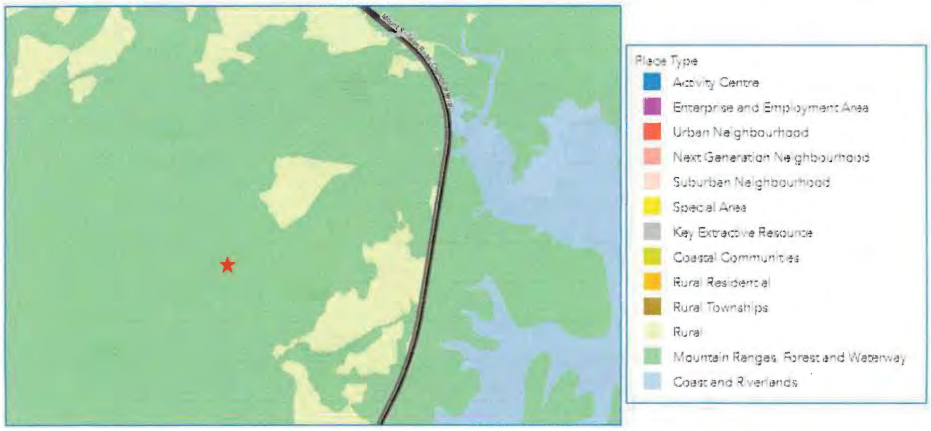
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
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> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

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The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

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Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

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The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

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e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

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term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

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Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

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   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
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     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
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Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

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The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

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- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

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The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



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One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

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forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

We note that the photograph included does show the tower protruding above the tree line excessively, it does not include the solid clump of Aerials at the top of the pole nor does it show the dish Aerial to be mounted upon the pole approx. two thirds of distance from the ground. Neither does the photograph show the base infrastructure required to house associated electronic and support equipment, Thus the photograph illustration is intentionally misleading.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I can be contacted on 32899804

Yours faithfully

Ann Hetherman

Ann Hetherman

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Patrick A Hetherman,
222, Hipathites Road,
Kobble Creek,
QLD 4520

Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

17th March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

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ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

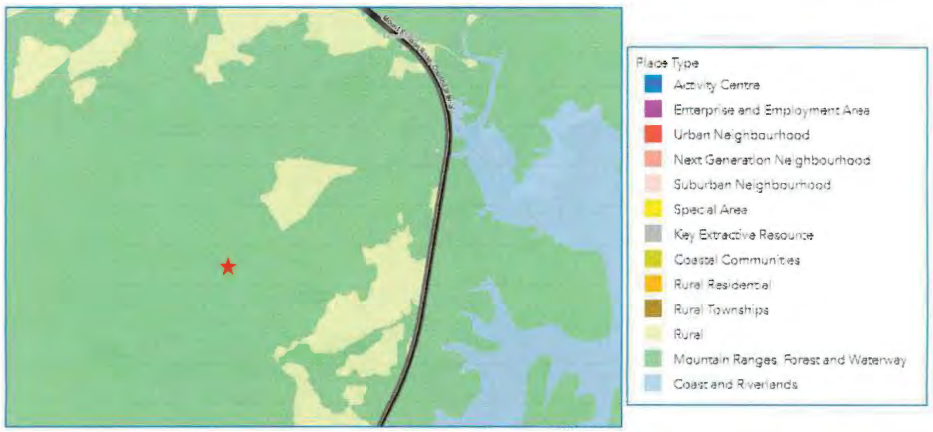
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

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The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme.**

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

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term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

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The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

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at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

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In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

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I strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I can be contacted on 32899804

Yours faithfully

Patrick A Hetherman

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

SARAH HETHERMAN
222 Hipathites Rd
Kobble Creek

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

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The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

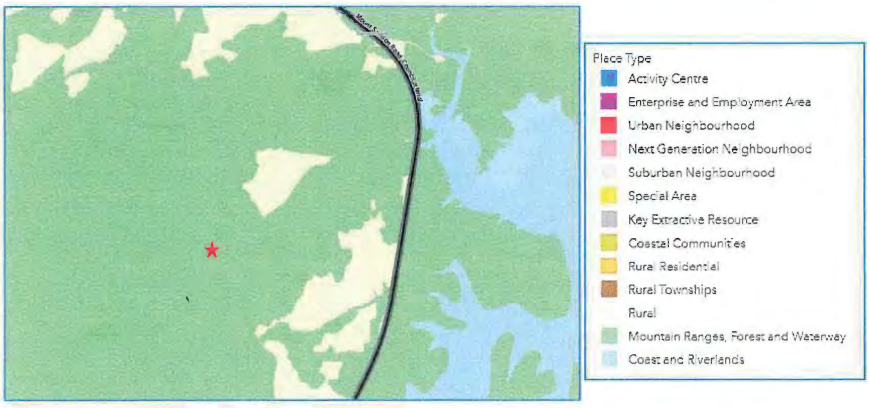
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A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

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f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

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Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
      A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
      B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
      C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.

0411 106 742

Yours faithfully,

SARAH HETHERMAN.

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Sheridan Hetherman,
222, Hipathites Road,
Kobble Creek,
QLD 4520

Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

17th March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

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ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

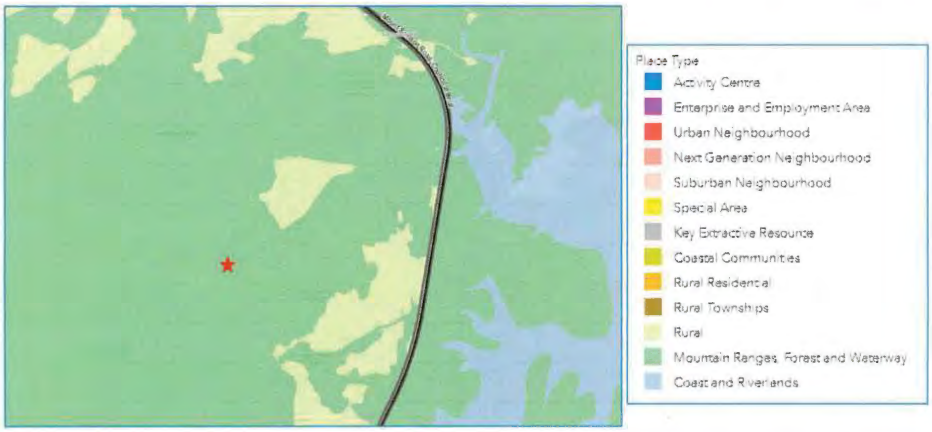
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

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The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

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term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
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   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

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The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



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at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

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forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

We note that the photograph included does show the tower protruding above the tree line excessively, it does not include the solid clump of Aerials at the top of the pole nor does it show the dish Aerial to be mounted upon the pole approx. two thirds of distance from the ground. Neither does the photograph show the base infrastructure required to house associated electronic and support equipment, Thus the photograph illustration is intentionally misleading.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I can be contacted on 0434202644

Yours faithfully

Sheridan Hetherman

John Hoffman
611 Mt Samson Road
Kobble Creek 4520

17 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

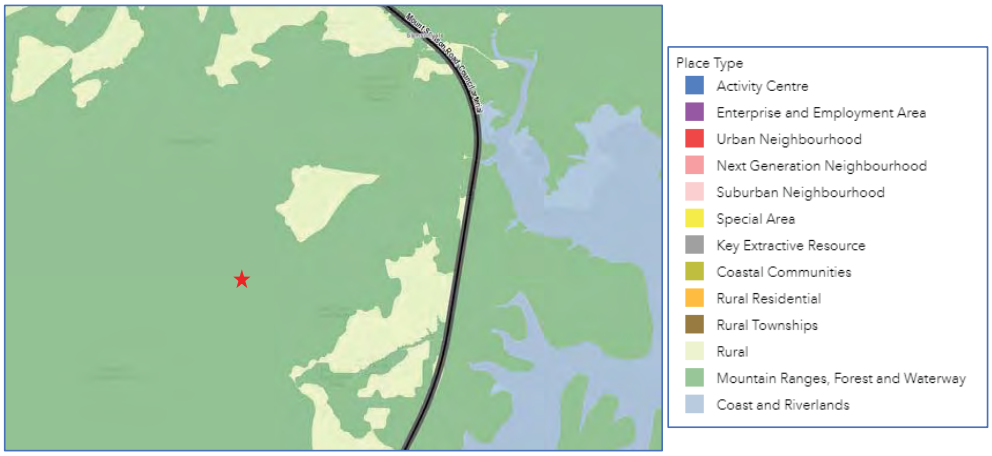
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

*The purpose of the **Rural zone** code is to:*

a. *provide for a wide range of rural uses including cropping [(19)], intensive horticulture[(40)], intensive animal industries[(39)], animal husbandry[(4)], animal keeping[(5)] and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I/we can be contacted on

hoffsare@bigpond.com

0457530509

Yours faithfully,

John Hoffman

From: DONNA CLARICE MERRITT
To: MBRC Incoming Mail
Subject: NBN case # DA/37146/2018/V2U
Date: Monday, 18 March 2019 7:48:00 AM

18.03.19 Joshua and Joanne Hawton
230 Hipathites Road
Kobble Creek
QLD, 4520
Moreten Bay Regional Council
Attention: CLANCY SLOAN
NBN Case # DA/37146/2018/V2U
230 Hipathites Road, Kobble Creek, Qld, 4520

My husband and I believe the NBN tower being installed at the above address to be a massive potitive advantage for home owners and business people in our community as it will increase our internet speeds.
The site itself makes sense as it will only slightly impact the surrounding environment while still being in an area to meet the required radio and service levels needed.
We are completely for the tower to go ahead and can't wait for the advantages the tower can bring to our internet uses.

Regards

Joshua and Joanne Hawton

Justin Hunter and Sandra Ellis
260 Hipathites Road
Kobble Creek QLD 4520

17 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

We refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. It is noted that the facility proposed is for a facility with an overall height of 51 m above natural ground level and is to be located within a secure compound having an area of 120 m^2 and comprising:

- 50m monopole with circular headframe.
- 1 x parabolic dish (1.2 m diameter).
- 3 x panel antennas (0.75 m long).
- 5 x Remote Radio Units (1.5 m long).
- 2 x outdoor cabinets at ground level.
- ancillary equipment.

The development application is on a 16 ha property that is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

1. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

2. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

3. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

4. Loss of significant native vegetation in the rural setting;

5. The application material supporting the development misrepresents information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The whole subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.

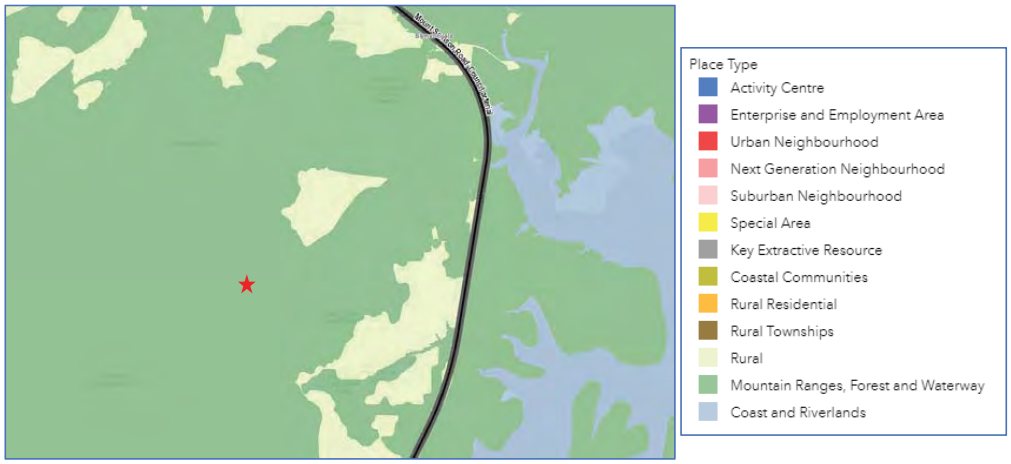


Figure 1 Place Type Zoning of the Moreton Bay Regional Council Planning Scheme

Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1 to 9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst Specific Outcome No.3 does look for high speed broadband services in the area, Specific Outcome No.2 reinforces that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone, the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

*The purpose of the **Rural zone** code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50 m high structure with antennas that increase the overall height of the facility to 51 m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and garish.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The location of the facility includes a compound with dimensions of 10 m x 12 m (120 m^2) for the monopole and ancillary equipment. Notes on the Site Setout Plan states that additional clearing of vegetation is required for a construction area crane

hardstand with dimensions of 10 m x 20 m (200 m^2). Plus, vegetation clearing for the proposed underground electrical route and minor widening of the existing access track to suit NBN site access are required. We conclude that a cleared area of up to 500 m^2 may be required for this facility. Also, the applicant has yet to provide an earthworks plan for this development application. The property and broader locality already contain cleared areas for development and additional clearing of vegetation should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that co-location with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10 m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3 m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The height of the structure is excessively high and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, blatantly towering over the natural landscape. The monopole is proposed to be positioned on the edge of a ridgeline with the surrounding area generally being of lower topography. It will be more than double the height of the existing tree canopy. This means that the monopole will become a prominent feature on the skyline from our house as shown in Figures 2 to 5. We have serious concerns that the information and photomontages provided by the applicant are misleading. The applicant has been invited on numerous occasions to take photos from our house. As can be seen by the images in Figures 2 to 5, there is no mature vegetation that could obscure the proposed facility, which the applicant's photomontages typically depicts. The proposed tower significantly impacts on the view and rural character of our home.

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)



Figure 2 Monopole shown in red impacts outlook from front verandah



Figure 3 Monopole shown in red is more than double height of existing tree canopy



Figure 4 Monopole shown in red visually impacts the skyline



Figure 5 Monopole shown in red can be seen from inside the house

The height and location of the telecommunications facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impact on the rural landscape character that is required to be protected. The tower should not significantly impact and totally disregard the rural character and amenity that our community lives in.

Alternative Locations

We strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted Planning Report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole*. As detailed above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

An alternative site would be co-location at the nearby existing Optus telecommunications facility. This co-location opportunity has already been identified as Candidate C and has been classified as "technically feasible". Based on the conflict with the planning scheme and additional land clearing requirements identified in this development application, it is suggested that the applicant is asked to demonstrate that there is no other suitable location for the facility. Other than for minimising expenditure, it is hard to believe that the facility cannot be positioned at another location that will impact the community less in terms of the visual impact and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme looks to protect and maintain areas of high value vegetation. A Property Vegetation Management Plan, Revision A dated 27-Feb-2019, was not made available to the public until 15-Mar-2019, when it was placed on Council's PD Online portal. The Property Vegetation Management Plan document provided is incomplete as it does not include Figure 1, Proposed Development, or Figure 2, Tree Plot and Restoration Area, or a General Arrangement Drawing referenced in Appendix A. The Property Vegetation Management Plan states twenty-one (21) trees with a Diameter of Breast Height (DBH) greater than, or equal to 15 cm, are contained within or directly adjacent to the development footprint and will be removed. The number of trees to be removed has doubled since the applicant's Response to Information Request on 21-Jan-2019 stated removal of only ten (10) trees and some tree trimming will be required, pending completion of the Geotechnical Investigation. The Geotechnical Investigation report (Reference 247473), Revision 0 dated 21-Jan-2019, was not made available to the public until 15-Mar-2019, when it was placed on Council's PD Online portal as Appendix B in the Landslide Risk Assessment Report, Rev 0 dated 14-Mar-2019. The Property Vegetation Management Plan document states a total of eight (8) trees in the surrounding area will be retained. Without the Tree Plot and Restoration Area figure, it is not clear if the twenty-one (21) trees to be removed are only within the 120 m^2 compound area of the facility, and if additional trees for the construction works, widening of the access track and underground electrical route will also need to be removed. Additionally, without the Tree Plot and Restoration Area figure, it is not known where the replacement trees, at a ratio of 3:1, will be planted. The proposal does not accurately reflect the loss of vegetation required in an area mapped as having high ecological value. Insufficient information to support the development has been provided and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We propose that suitable alternate locations for the facility have not been sufficiently considered and would have less impacts on the ecological values of the area.

We also note that an amended Landscape Plan has only recently been made available to the public on 13-Mar-2019. The Landscape Plan shows that the landscaping is deficient in terms of meeting the minimum 3 m landscaped buffer required by the planning scheme. Plus, there is no indication of any screening on the access gates to the compound.

Misrepresentation of Information

The process undertaken by the applicant for the proposed development has fractured our community. An information session was held on 11th October 2018 at the Dayboro Bowls Club in regard to this development application for a telecommunications facility. Not all adjoining neighbours, or even nearby neighbours, were notified about this information session. It appears that the applicant selected the neighbours that were notified about the information session to increase the likelihood of receiving positive feedback about the proposed development.

As outlined above, the photomontages provided by the applicant typically depict mature vegetation obscuring a proposed facility. As shown in the images, there is no mature vegetation that can obscure the monopole, which will become a prominent feature on the skyline. The typical photomontages provided by the applicant do not show balanced viewpoints as the monopole tower will have significant visual impact and totally disregard the rural character and amenity that our community lives in.

The applicant has not released complete reports and information in a timely manner. For example, the Property Vegetation Management Plan detailing the loss of significant native vegetation in a rural setting was not made available to the public until the third last working day, 15-Mar-2019, before the end of the public notification period and relevant figures have not been included in the issued report. Review of the Response to Information Request, made by the applicant on 21-Jan-2019, stated the expected number of trees to be removed pending completion of the Geotechnical Investigation. However, review of the Landslide Risk Assessment Report, issued to the public on 15-Mar-2019, shows that the Geotechnical Investigation was first issued on 21-Jan-2019. The number of high value trees (DBH ≥15 cm) required to be removed has doubled from ten (10) to twenty-one (21) as a result of the Geotechnical Investigation. This additional information was not provided to the public in a timely manner.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51 m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity

and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

We strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission, we can be contacted on 0429 899 040.

Yours sincerely,



Justin Hunter and Sandra Ellis

Kristiaan Amos and Aamee Hetherman
222 Hipathites road Kobble Creek 4520

18 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

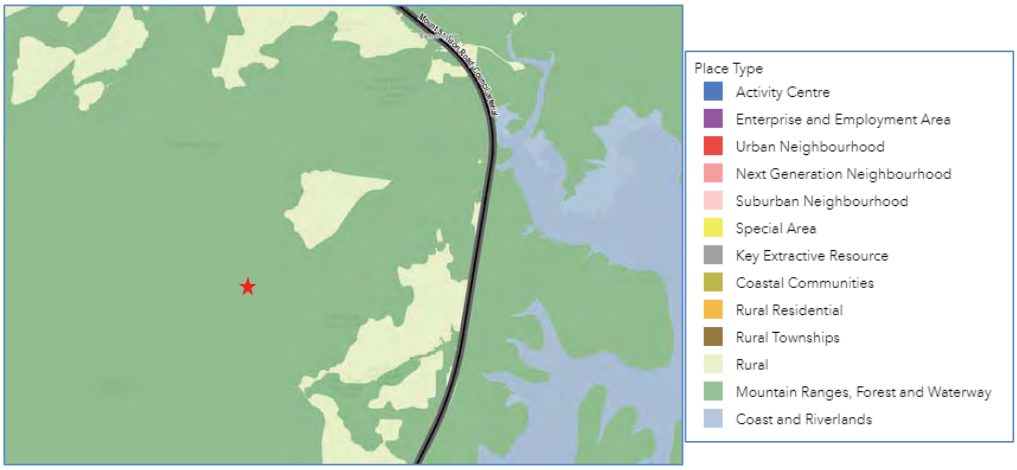
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping [19], intensive horticulture[40], intensive animal industries[39], animal husbandry[4], animal keeping[5] and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, sitting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The sitting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
  PO73: insufficient information has been provided to demonstrate that co location with other existing facilities is not an option. There are several facilities in the 4520 postcode which have been approved by mbrc which include extensions of existing towers and footing upgrades to accommodate the extension. E.g. 191 Old mount Samson road. Why couldn't these techniques be used in this instance and use the existing area at 113 Kriesch Road.

  PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area

which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 21 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. There is also no mention of the clearing required to connect the facility to mains power. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Misrepresentation of Information

I refer to the Response to Information dated the 21 January 2019. In this document there was photomontages presented as request by mbrc to indicate the visual impact from dwellings on 222 Hipathites Road Kobble creek. I refer to images in attachment B, view 3 and view 4. These photomontages are not an accurate indication of what the facility would look like for the following reasons

Firstly they are not in the proposed lease area. In both photomontages the tower position is substantially left of the actual proposed location.

Secondly No tree clearing has been shown in the images.

Thirdly no ground equipment has been shown in the images, e.g. ground cabinets, fencing.

The visual impact from 222 Hipathites Road has not been demonstrated accurately in these photomontages.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- Performance outcomes of the Rural Zone Code,
- The Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- The Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photomontages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

We strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure or amend the proposal to be fully compliant with the requirements of its planning scheme.

Should you require any further information about this submission we can be contacted on 0403127794

Yours faithfully,

Kristiaan Amos and Aamee Hetherman

From:	Kathryn Thomson
To:	MBRC Incoming Mail
Cc:	Clancy Sloan
Subject:	Submission in Support of Telecommunication Facility as follows: DA/37146/2018/V2U 230 Hipathities Road Kobble Creek qld 4520 lot 2 RP 162985
Date:	Monday, 18 March 2019 11:29:35 AM

To Whom it May Concern,

RE: Telecommunication Facility
at 230 Hipathities Road
Kobble Creek 4520
DA application No. DA/37146/2018/V2U

We have read all of the information provided RE: tower to be situated on the above site. I did want to provide my feedback, as I have had people ringing me with false information encouraging me to submit a submission to get the tower stopped.

I have done my own research and would like to put forward a **submission in support FOR the Telecommunication Facility** to go ahead.

Our property directly backs onto the property at 230 Hipathities Road Kobble Creek. My husband and I are small business owners and rely heavily on the internet for communication for our business. The area of Samsonvale and Kobble Creek have large numbers of small business people which this will also benefit. Presently we have a very unreliable service and know that we will greatly benefit from anything that will support better and more reliable internet services for us and our community. We also use the internet for socializing for both us and our family.

So improved broadband should be a significant priority in this area with many people currently having insufficient quality ADSL broadband options. The NBN fixed wireless facility offers speeds of 50Mbps download and 20 Mbps upload, which will offer a significant improvement to current services.

We understand that the site for the facility is ideally suited to meeting the required NBN radio coverage and service levels, whilst minimising the impact on the surrounding landscape. We do understand that people are complaining that they will see the tower. Around our and the Dayboro area there are also towers that are visible if you are specifically looking for them, but with the colour of the towers being green, they blend in very well and are only noticeable if they are directly pointed out. I did have this discussion with people that rang me and they were unaware of the other towers around our area, so I don't believe that the tower will negatively effect there or our outlook. Presently the tower will be more visible from our home than any of the other neighbours around the property that the tower will be constructed on, and we definitely think that the benefits to our community far outweigh the fact that the tower will be visible from our home.

Our area is a growing area and definitely need all resources added to support the growing

population. I have been a part of this community for all of my life and believe that the NBN would definitely be an asset to our community.

Thanking You
Lyle & Kathryn Thomson
271 Aitcheson Road
Kobble Creek
4520
0413121360

Scanned By:TYRRELL@MBRCDOM On: 19/03/2019 [illegible]

Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

David and Amanda Massey
1132 Winn Rd
Mt Samson
4520

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

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- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
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- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

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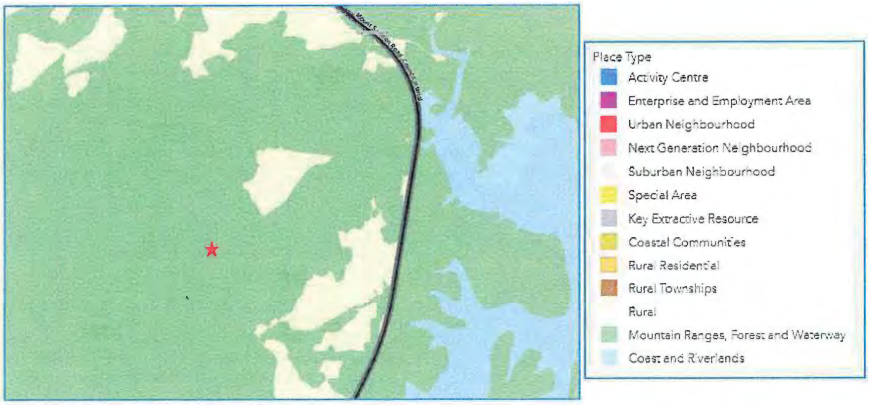
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

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The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

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Scanned By:TYRRELL@MBRCDOM On: 19/03/2019 PM Moreton Bay Regional Council

Residential development will be in the form of dispersed dwellings and farm buildings ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*
2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*
3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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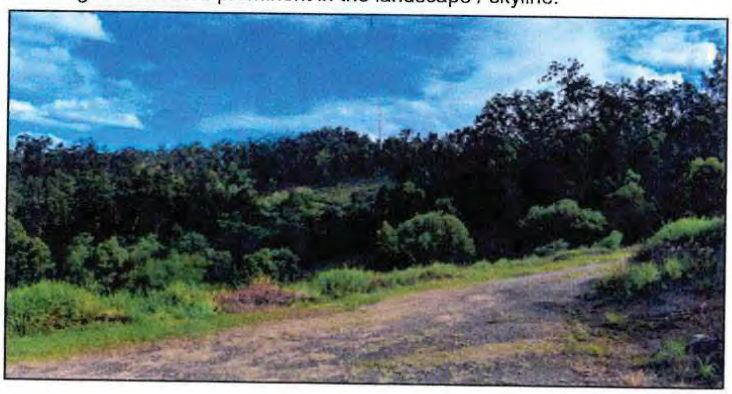
The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.

0415957408 davemassey1repairs@gmail.com

1132 WINN RD.
MT SAMSON. 4520.
QLD.

Yours faithfully,

DAVID MASSEY
AMANDA MASSEY

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

GARRY WAYNE
11 KRIESCH RD
SAMSONVALE 4520.

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

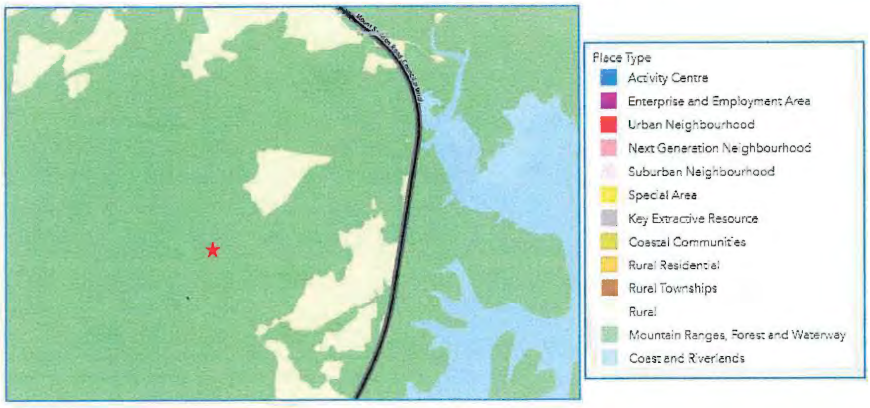
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

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The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

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Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

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The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

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Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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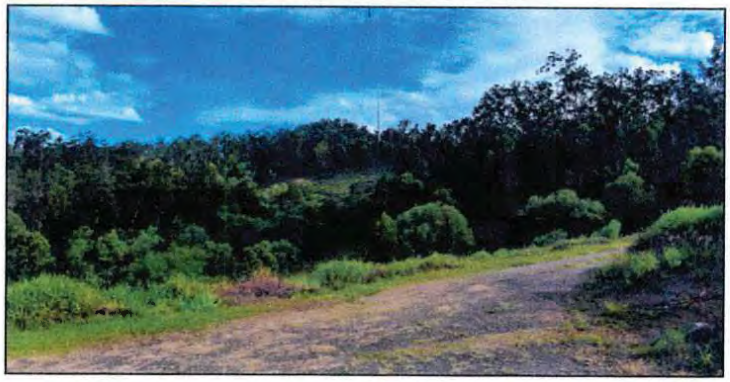
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Summary & Conclusions

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- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.
0428 624 969.

Yours faithfully,

GARRY W. MAYNE.

24

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID: _____

JENNIFER MAYNE
77 KRIESCH RD,
SAMSONVALE. 4520

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

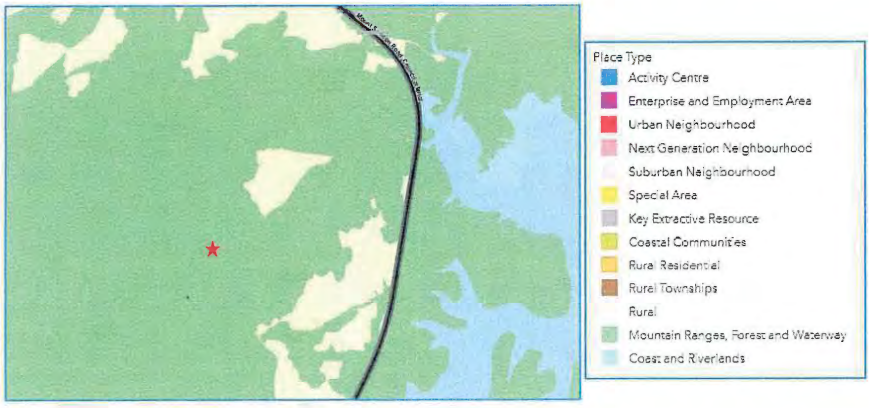
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

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- *Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

  *The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

*The purpose of the **Rural zone** code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

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value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.
07 32899254

Yours faithfully,

J. M. Mayne
JENNIFER MAYNE.

16

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Moreton Bay Regional Council
RECORDS MANAGEMENT
19 MAR 2019
OBJ ID:

STUART O'CONNELL
142 KRIESCH RD
SAMSONVALE QLD
4520

16/March/2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

MORETON BAY
REGIONAL COUNCIL
19 MAR 2019
CABOOLTURE CUSTOMER
SERVICE CENTRE

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m² and comprising:

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The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

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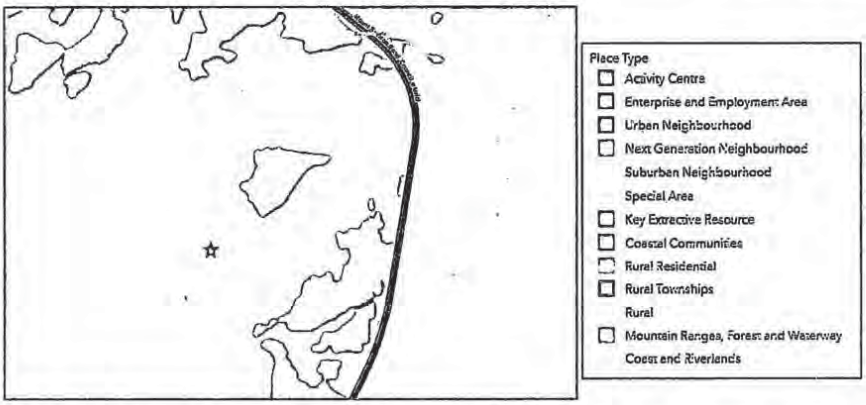
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



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e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

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Comment: The proposal is not for a rural use.

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     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
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Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

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clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline..



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

Scanned By:TYRRELL@MBRCDOM On: 19/03/2019 PM Moreton Bay Regional Council

value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on.

0412652949
FLATHEADBB@GMAIL.COM.

Yours faithfully,

64

Paul Smith
113 Kriesch Road
Samsonvale Qld 4520

18 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

We refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

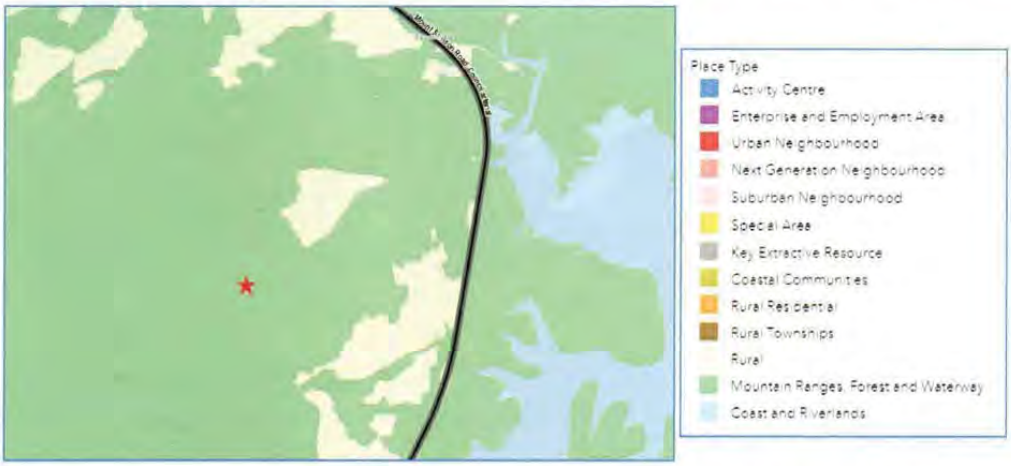
v. Removal of koala habitat

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape

character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for

Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Removal of Koala Habitat

The proposed site is situated in an area of Priority Koala Assessable Development Area. Per the Queensland Government mapping, it is likely Medium Value Bushland, or is otherwise Medium Value Rehabilitation. Other location options proposed by the application are in a lower value koala habitat classification. Locating the tower adjacent to the existing telecommunications facility at 113 Kriesch Road, Samsonvale, would see it placed within Low Value Koala Habitat Bushland.

We have enclosed as Annexure A to this letter Queensland Government mapping that includes both locations.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

The proposal is in medium value koala habitat areas where other options are available in low value koala habitats.

We strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

We propose that the tower should be co located on, or adjacent to, the existing tower approximately 500m south of the proposed tower, on 113 Kriesch Road Samsonvale.

Should you require any further information about this submission We can be contacted on 0428 844 083.

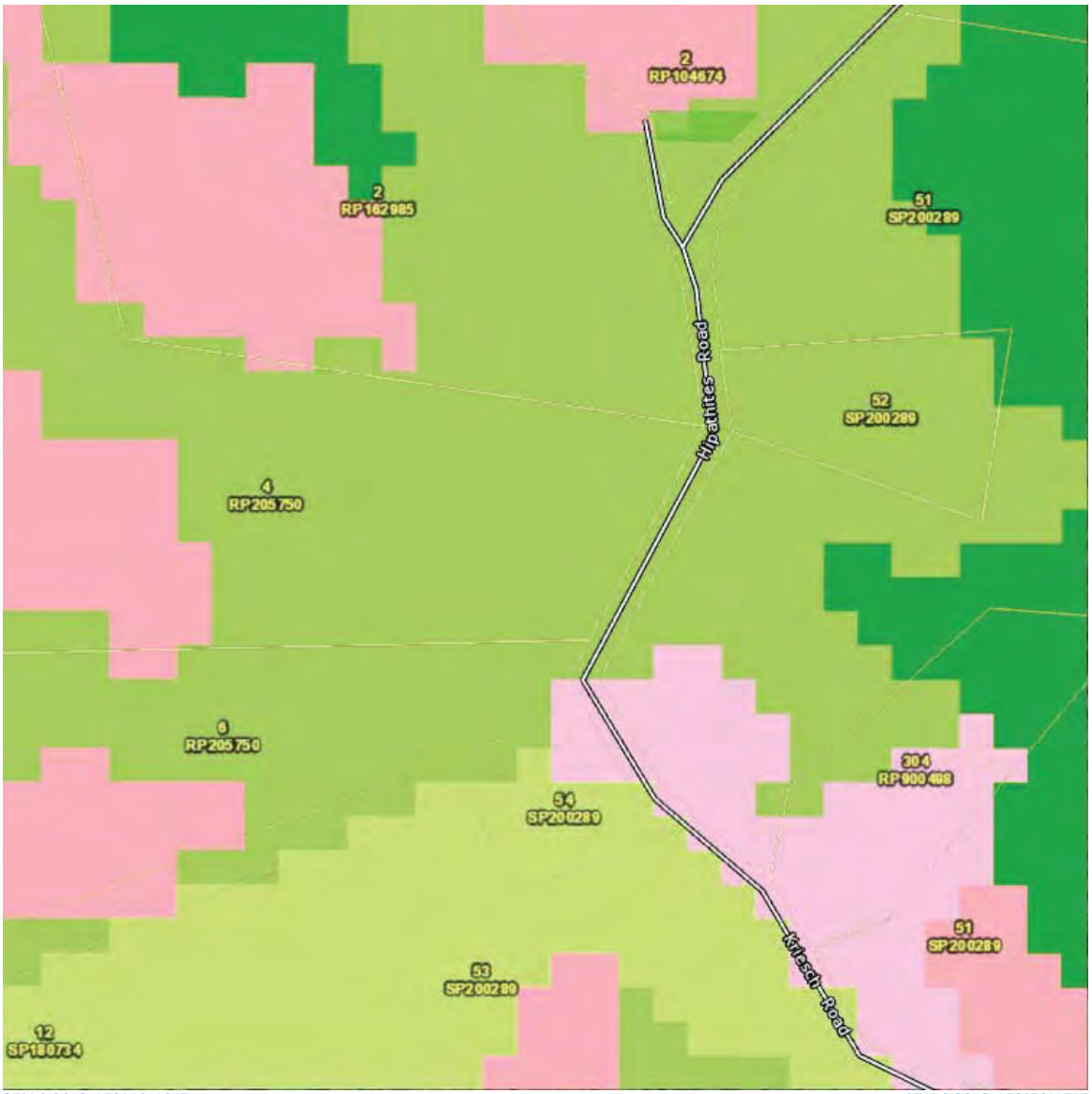
Yours faithfully,

Paul Smith
Encl,

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

Annexure A

27°16'6"S 152°49'48"E 27°16'6"S 152°50'17"E



27°16'32"S 152°49'48"E 27°16'32"S 152°50'17"E

A product of Queensland Globe



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100 metres

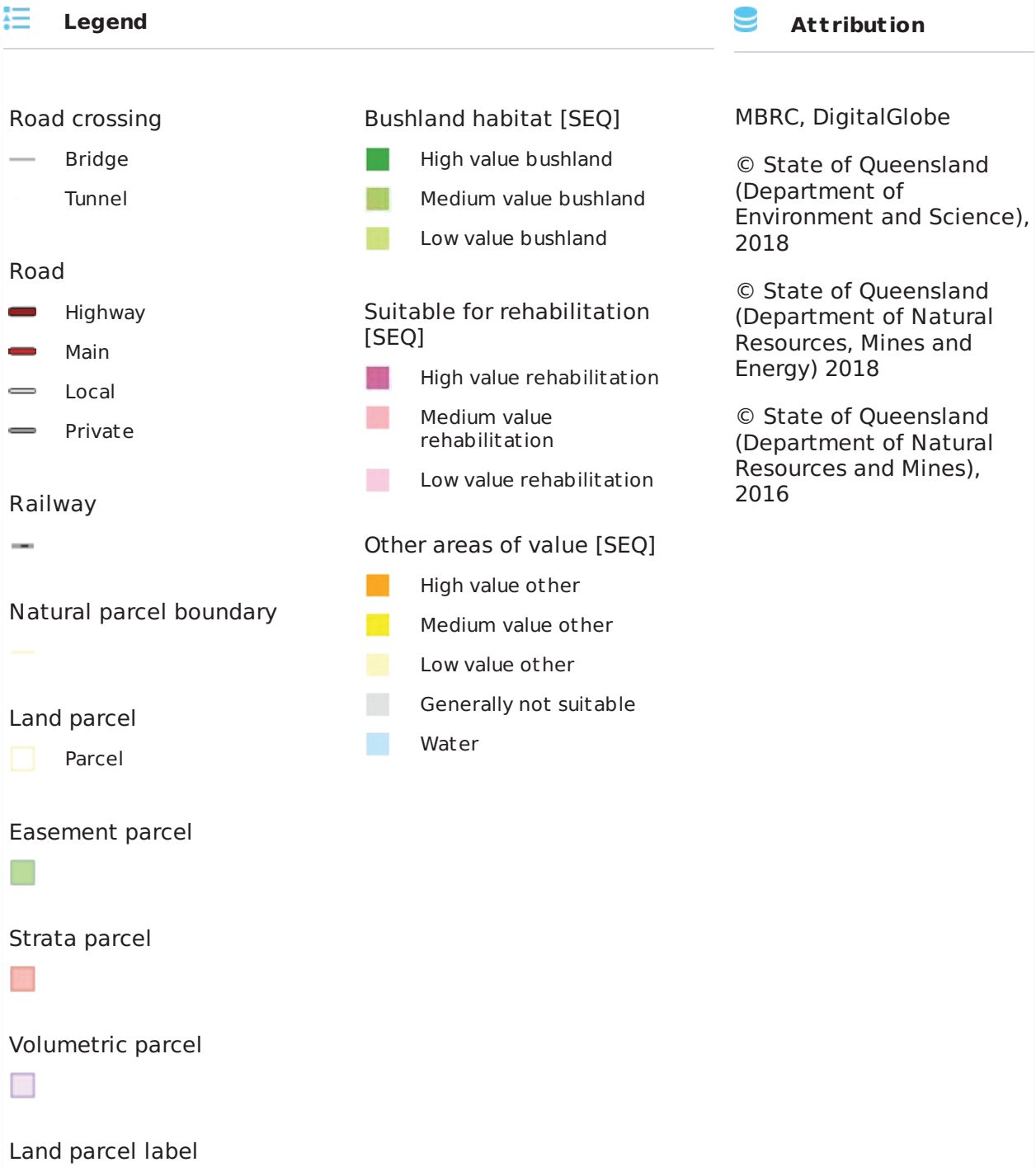
Print Date: 19/3/2019
Paper Size: A4

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Queensland Government

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ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)



From:	Pete Smit
To:	MBRC Incoming Mail
Subject:	Assessment Manager , APPLICATION NUMBER: DA/37146/2018/V2U
Date:	Tuesday, 19 March 2019 2:27:25 PM
Attachments:	1c1e762c.jpg

Attn: Assessment Manager
MBRC
PO Box 159
Caboolture. Qld. 4510

Re: Council Ref. DA/37146/2018/V2U

Dear Sir,

I must preface this objection by stating that it is not my want to oppose any development that is for the betterment of the community at large.

Sadly, it is acknowledged that the NBN is, and always was going to be, a dud.

The proposed tower (on land at 230 Hipathites Rd, Kobble Creek, Qld, 4520), to which this submission relates is further testimony to the lack of clear vision that NBN Co has shown.

If the proposed tower needed to be located in suburbia, I readily accept that it would be very difficult to relocate from a chosen site due to land scarcity issues. However, there is an abundance of vacant land in the proposed zone, where the tower could be relocated to the appeasement of all residents.

I have enough faith in the MBRC to believe that no way in this wide world would they approve a structure that will cause heartache and uncalled for stress to those adversely affected by its proximity.The diabolical financial effect this tower will have on affected landowners is surely not acceptable to our elected representatives.

This ill planned and ill placed tower has pitted neighbour against neighbour, friend against friend. The ill feeling generated by this proposed tower is perhaps another fine example of NBN Co`s failing on the human front.

Thank you.

Yours faithfully,

Pete Smit

[]

PO Box 11, Dayboro. Qld.4521
Ph 07 - 3289 9164
Mob. 043 8899164
www.cobblecastaustralia.com

Sarah Smith
113 Kriesch Road
Samsonvale Qld 4520

18 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

We refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

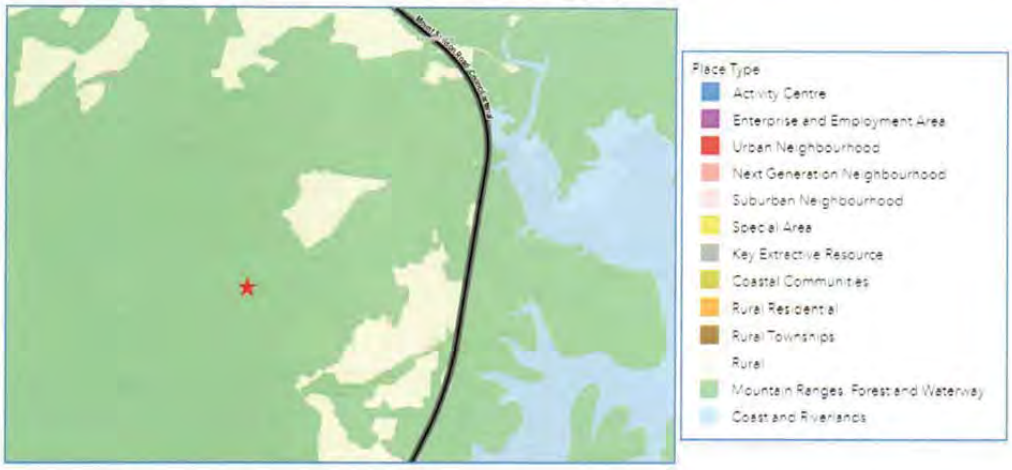
v. Removal of koala habitat

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
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The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
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c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape

character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. *A wide range of rural uses, as identified in the table below, are established.*

Comment: The proposal is not for a rural use.

i. *Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.*

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. *Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.*

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. *Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:*
   - i. *adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
   - ii. *ensuring no further instability, erosion or degradation of the land, water or soil resource;*
   - iii. *when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
   - iv. *maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
     - A. *the provision of replacement, restoration, rehabilitation planting and landscaping;*
     - B. *the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
     - C. *the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
   - v. *protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for

Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Removal of Koala Habitat

The proposed site is situated in an area of Priority Koala Assessable Development Area. Per the Queensland Government mapping, it is likely Medium Value Bushland, or is otherwise Medium Value Rehabilitation. Other location options proposed by the application are in a lower value koala habitat classification. Locating the tower adjacent to the existing telecommunications facility at 113 Kriesch Road, Samsonvale, would see it placed within Low Value Koala Habitat Bushland.

We have enclosed as Annexure A to this letter Queensland Government mapping that includes both locations.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

The proposal is in medium value koala habitat areas where other options are available in low value koala habitats.

We strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

We propose that the tower should be co located on, or adjacent to, the existing tower approximately 500m south of the proposed tower, on 113 Kriesch Road Samsonvale.

Should you require any further information about this submission We can be contacted on 0428 844 083.

Yours faithfully,

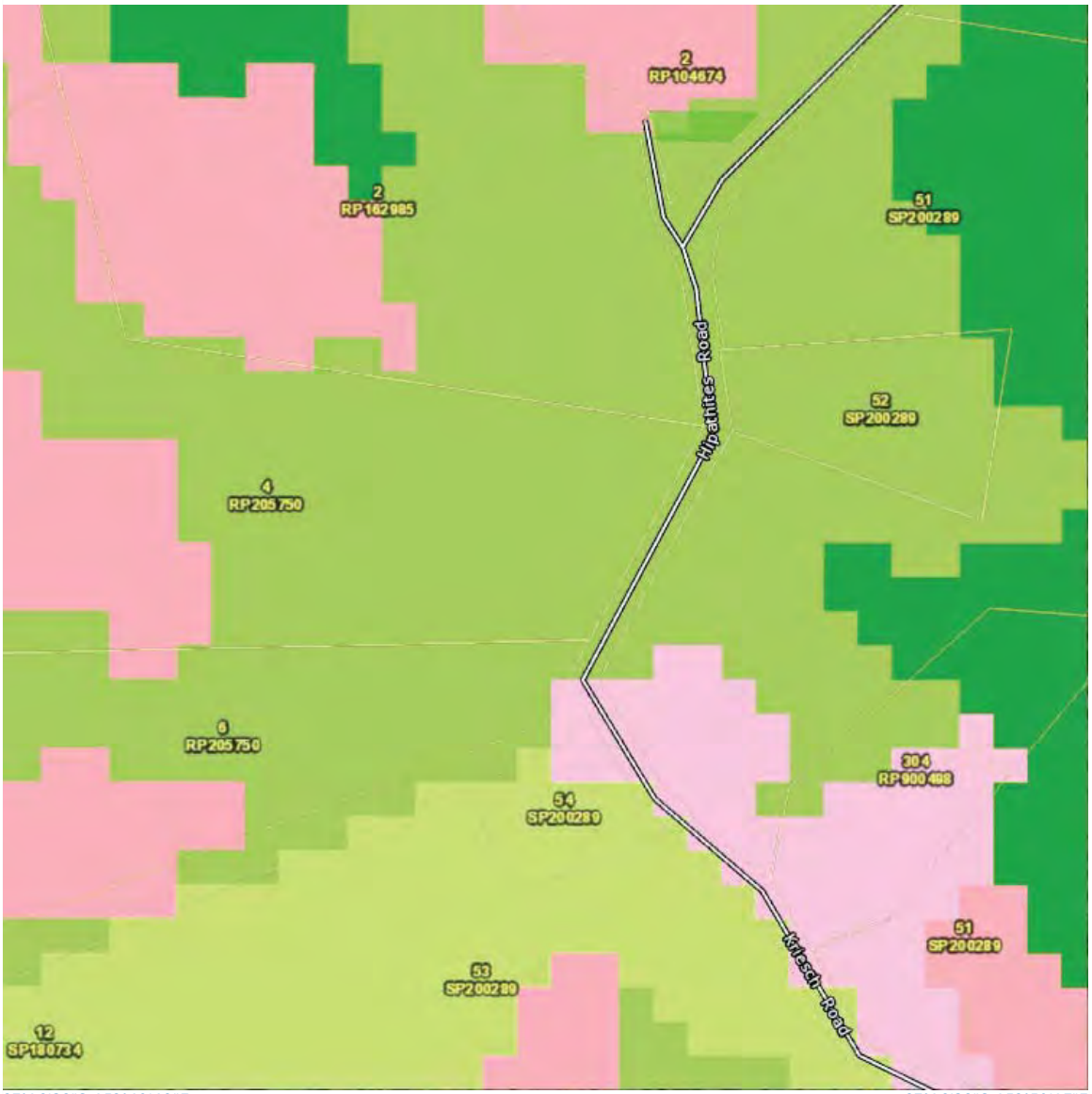
Sarah Smith
Encl.

8

ITEM 2.1 DA/37146/2018/V2U - MCU - DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY AT 230 HIPATHITES ROAD, KOBBLE CREEK -DIVISION 11 - A18576724 (Cont.)

Annexure A

27°16'6"S 152°49'48"E 27°16'6"S 152°50'17"E



27°16'32"S 152°49'48"E 27°16'32"S 152°50'17"E

A product of Queensland Globe



N

100 metres

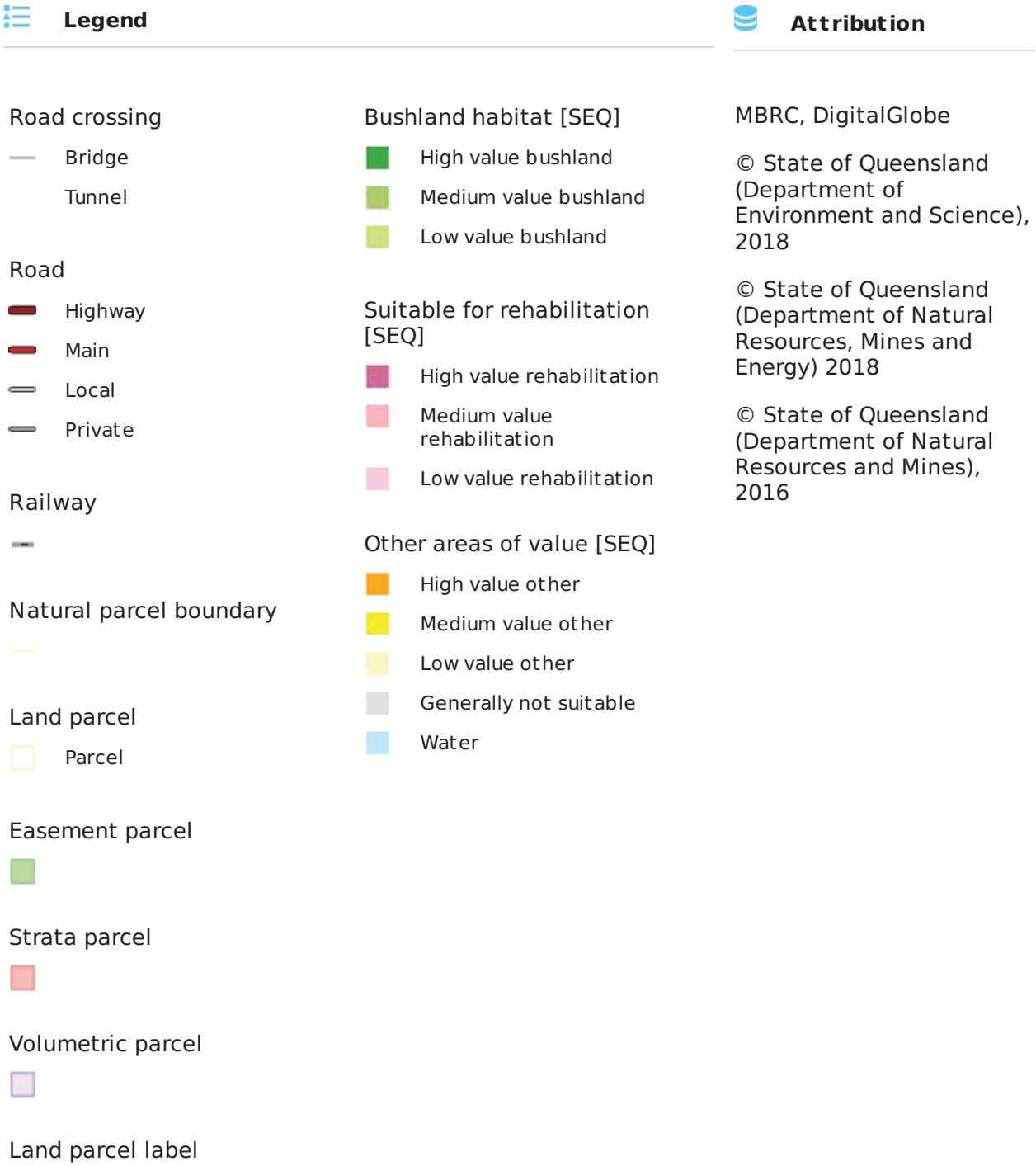
Print Date: 19/3/2019
Paper Size: A4

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Shaylene Hoffman
611 Mt Samson Road
Kobble Creek 4520

17 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

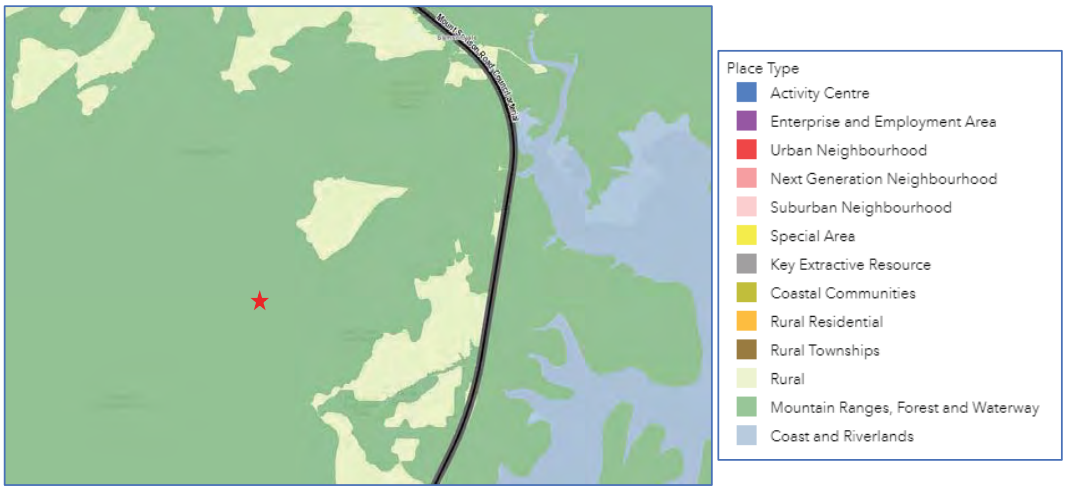
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

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In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure
Should you require any further information about this submission I/we can be contacted on

hoffsare@bigpond.com

0488777610

Yours faithfully,

Shaylene Hoffman

Stephen Hetherman
222 Hipathites rd
Kobble creek 4520

17 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the

Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

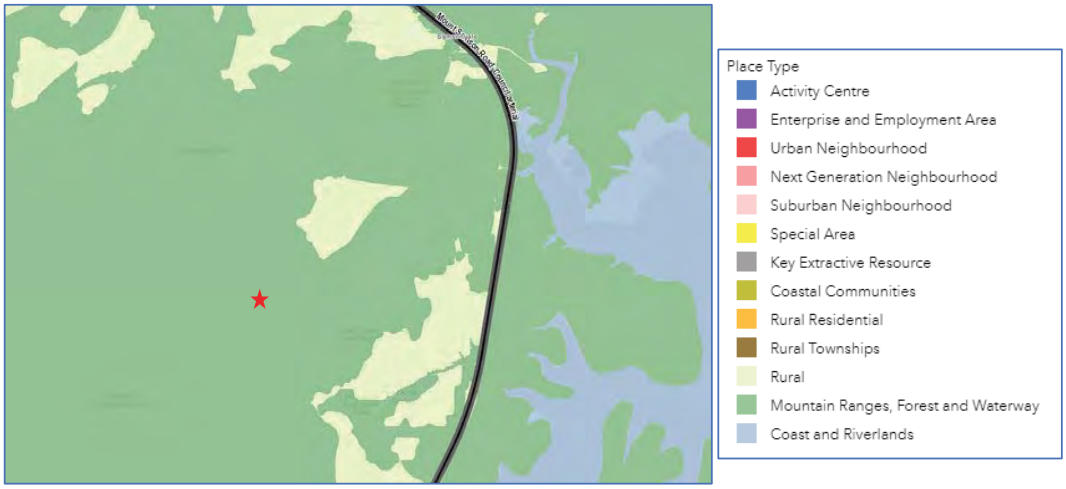
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*

*Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

*The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. **The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

*The purpose of the **Rural zone** code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction of a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional

clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

<u>Height / Visual Impacts / Scenic Amenity</u>

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole*.

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological

value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Coments from Stephen Hetherman property owner lot 2 rp104674

The visual impact of the tower being 51 meters high and under 10 meters from the northern boundary conflicts with the requirement of the rural zone code item K **''development does not result in adverse or Nuisance impacts on adjoining properties or the wider rural environment.''**

The nuisance to our rural way of life is that there is no screening that can hide a 50 metre tall tower that is 3 meters at its base and less than the required 10 meters from the property entry gate at 222 Hipathites rd which is the adjoining northern boundary.

As mentioned earlier the development applications fails to meet the required 3 meters of dense screening. The dense screening that has been offered in the revised landscaping plan, at only one meter wide and is an to attempt to appease the requirement rather than to provide a satisfactory out come

In the photo provided by Aurecon on page 5, the minimum of 500m2 of trees and scrub that will be removed, including the 21 trees to be removed are still in shot and are being used to hide the overall impact, of not only the height of the tower but does not show ground or aerial equipment listed in the development application. Therefore this photo montage misrepresents the reality of the overall impact of the tower to the northern boundary.

I have attached a photograph taken at the same location as the photo supplied by the NBN showing a White motor vehicle at the proposed location of the tower. The second Photo shows a truer indication of the visual impact of the ground Buildings caused by this development. I have deleted the trees that will be removed and added a representation of the tower. The tower representation stops at the current tree line, the tower will be at least twice the tree line height.

Before





After

Dept of State development, manufacturing, infrastructure and planning response dated 15 November 2018 ref number TARP 1811-8286 SRA states that the area identified as area A is the allowable area to be cleared of vegetation, this area as stated is .02 of a hectare which is an area of 2000 m2. This is in direct conflict with the Rural Zone Code.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I/we can be contacted on

stevechrys222@hotmail.com or 0407 172 997

Yours faithfully,



Stephen Hetherman
222 hipathiteis rd
Kobble Kreek 4520

Tammy Clarke
96 Kriesch Road
Samsonvale Qld 4520

18 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

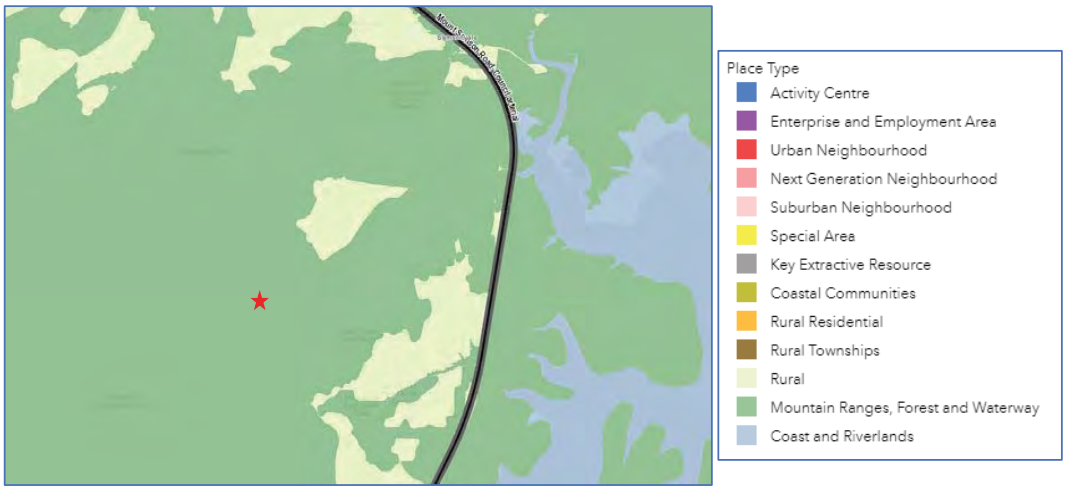
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

> *The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality.* ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

> ***3.14.2.8 Specific Outcomes - Infrastructure***
> 1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*
>
> 2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*
>
> 3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

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The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

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> - *b. provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
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> - *f. implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

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Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

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- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Yours faithfully,

T Clarke

Tammy Clarke

Paul Terrett
47 Dietz Court
Samsonvale. QLD. 4520

19 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER)
230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985)
APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.
ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

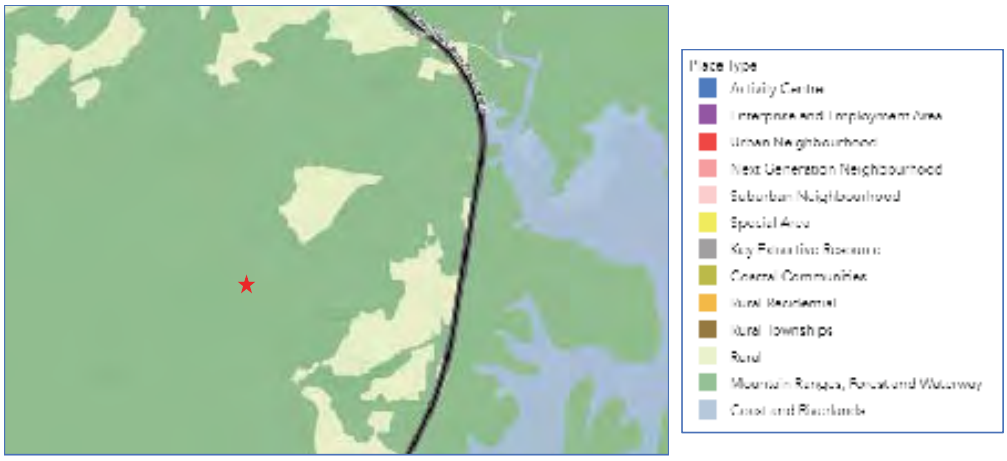
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*
>
> *The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving*

downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.

- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look

for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Misrepresentation of Information

Discuss points raised by Kris in his email…

[residents can add any additional concerns]

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I/we can be contacted on 0418453866

Yours faithfully,

Paul Terrett

Susan Terrett
47 Dietz Court
Samsonvale. QLD. 4520

19 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
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The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.
ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

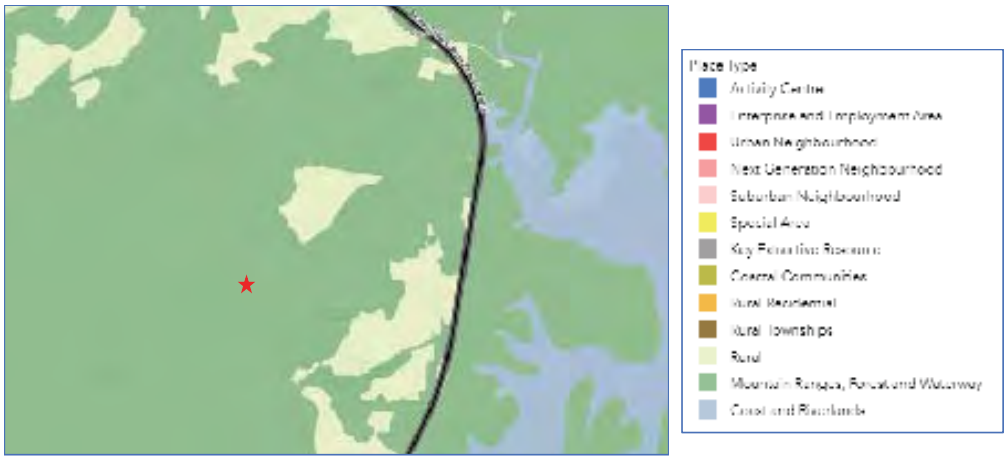
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A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



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The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

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2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

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The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.

- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look

for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Misrepresentation of Information

Discuss points raised by Kris in his email…

[residents can add any additional concerns]

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure.

Should you require any further information about this submission I/we can be contacted on 0407962264

Yours faithfully,

Susan Terrett

Zoe Hetherman
11 Moonya street
Kingaroy 4610

17 March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

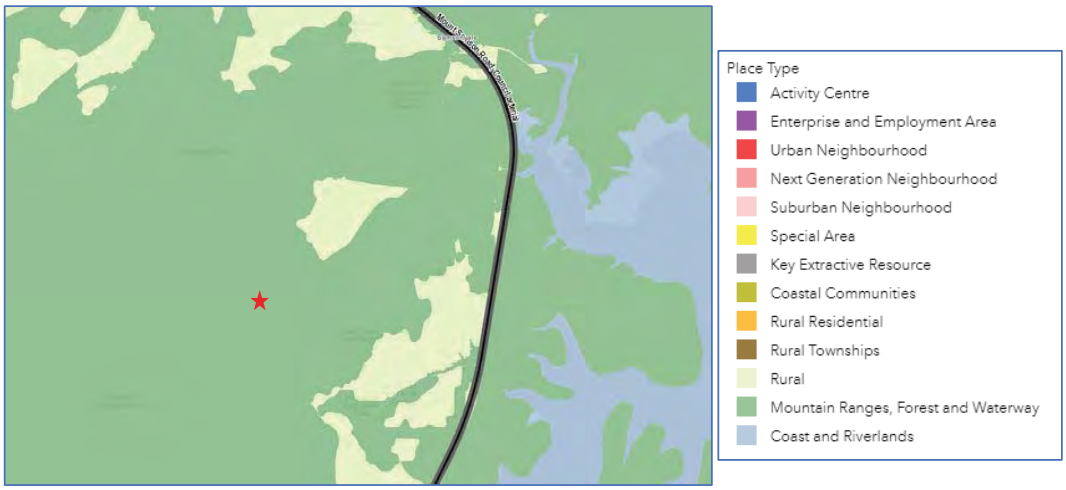
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings* ***with limited infrastructure services provided****. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

> *The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality.* ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

> ***3.14.2.8 Specific Outcomes - Infrastructure***
> 1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*
>
> 2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*
>
> 3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

> *The purpose of the* ***Rural zone*** *code is to:*
> - *a. provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
> - *b. provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
> - *c. protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
> - *d. ensure the rural area remains a pleasant place for people to work, live and recreate;*
> - *e. restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
> - *f. implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure

Should you require any further information about this submission I/we can be contacted on 0425 149 482 or zoed89@hotmail.com

Yours faithfully,

Zoe Hetherman
Property owner
222 hipathites rd Kobble Creek

INSERT: NAME

ADDRESS

XXX March 2019

The Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
CABOOLTURE QLD 4510

Attention: Clancy Sloan – Development Services

Dear Clancy,

RE: DEVELOPMENT APPLICATION FOR MATERIAL CHANGE OF USE – DEVELOPMENT PERMIT FOR TELECOMMUNICATIONS FACILITY (NBN TOWER) 230 HIPATHITES ROAD, KOBBLE CREEK (LOT 2 RP162985) APPLICATION NUMBER: DA/37146/2018/V2U

SUBMISSION AGAINST PROPOSED DEVELOPMENT

I/we refer to the above development application that has been submitted to Council for a proposed Telecommunications Facility (on behalf of NBN for a Fixed Wireless Facility) over Lot 2 on RP162985 and being located at 230 Hipathites Road, Kobble Creek. Specifically, it is noted the facility is proposed with an overall height of 51m above natural ground level and is to be located within a secure compound having an area of 120m^2 and comprising:

- 50m monopole;
- 1 x parabolic dish;
- 3 x panel antennas;
- 5 x Remote Radio Units (RRUs);
- 2 x outdoor cabinets at ground level; and
- Ancillary equipment

The property is 16ha and is located in the Rural Zone and Mountain Ranges, Forest and Waterways Place Type under the *MBRC Planning Scheme 2016*. The information presented by the applicant is not sufficient in demonstrating compliance with the relevant aspects of the relevant planning documents in the context of the rural setting within which it is proposed.

In accordance with the relevant provisions of the *Planning Act 2016* and the accompanying *Development Assessment Rules*, we write in **strong objection** to the proposed development. As a properly made submitter, we note our rights to appeal to the Planning and Environment Court against any decision made by Council on this application.

The grounds of objection follow in detail, and are summarised as follows:

i. The proposal conflicts with elements of the *Moreton Bay Regional Council Planning Scheme 2016*, including the Purpose of the Rural Zone Code and components of the Strategic Framework, and there are insufficient planning grounds to support the development despite the conflict.

ii. The proposal will have a significant adverse impact on the residential amenity of the surrounding community and will result in an unacceptable level of nuisance.

iii. The height of the pole is excessive and there is a lack of information in the common material to confirm that alternative locations have been properly investigated with a view to reduce the height and visual impacts of the monopole;

iv. Loss of significant native vegetation in the rural setting;

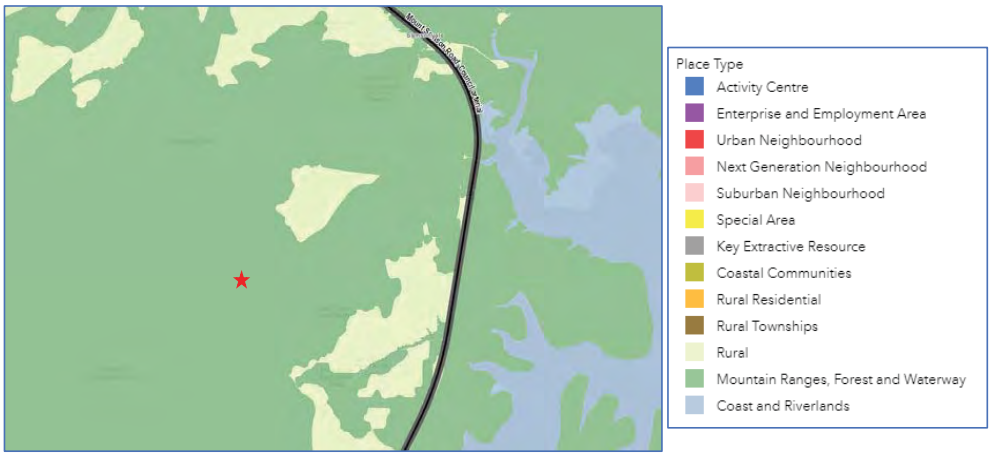
v. The application material supporting the development presents false and misleading information.

A detailed summary of concerns relevant to each of these aspects, including how the proposed development does not address the relevant parts of the *MBRC Planning Scheme 2016* are provided in detail under each point below.

Conflict with MBRC Planning Scheme 2016

1. Conflict with Strategic Framework

The entirety of the subject site is located in the Rural Zone under the *MBRC Planning Scheme 2016*. As shown in the figure below, the site is also located in the Mountain Ranges, Forest and Waterway Place Type as are all the surrounding properties.



Importantly, an Impact Assessable application is assessable against the whole of the Planning Scheme. It is therefore considered relevant to consider how the proposed development complies with the Strategic Framework, particularly given the development also conflicts with parts of the Rural Zone Code. The Strategic Framework contains the broader intent for development in an area, reflected by outcomes in the MBRC Place Type Model.

The intent of the place type, as outlined in section *3.14.2 Element – Mountain ranges, forests and waterways place type* states:

> *The mountain ranges, forests and waterways place type consists of protected areas, private lands which are more than 80% forests; ridge lines and steep slopes, Council managed natural reserves, and flood plains associated with waterways.*
>
> *Residential development will be in the form of dispersed dwellings and farm buildings **with limited infrastructure services provided**. Non-residential development is provided in appropriate locations but is small in scale with a particular focus on tourism activities.*

The protected areas within the Mountain ranges, forests and waterways place type are the cornerstones upon which the Council's strategy for protection of the Region's green infrastructure is founded. The place type also contains the headwater of the Region's drinking water supply catchments. Protection of water quality in these upper catchment areas is critical to achieving downstream water quality. ***The environmental values in these areas are given preference over development that would impact on these values.***

The intent of the Place Type as expressed above notes that infrastructure is limited and that the environmental values of the area are given preference over development. The infrastructure may be necessary as outlined in the information presented by the applicant, but the Region's green infrastructure should be given priority.

The intent of the Place Type is further expressed through the Strategic Outcomes which follow in section 3.14.2.1-9 of the Strategic Framework. The most relevant of the Specific Outcomes for Infrastructure state:

3.14.2.8 Specific Outcomes - Infrastructure

1. *The Mountain ranges, forests and waterways place type is provided with limited Infrastructure services;*

2. *Infrastructure, including public utilities and major telecommunication facilities, are designed and located to mitigate detrimental impacts on the visual quality and environmental values, character and amenity of the place type; and*

3. *Access to high speed broadband is provided to support residential and business needs.*

Whilst outcome (3) does look for high speed broadband services in the area, outcome (3) reiterates that the infrastructure must not compromise the visual quality and environmental values, character and amenity of the place type.

The proposed 51m high facility which extends an excessive distance beyond the height of the existing tree line having detrimental impacts on the visual quality of the rural landscape and requires the removal of native vegetation in an area where the environmental values take priority. The proposal **does not satisfy the relevant components of the Strategic Framework and is therefore in conflict with the Planning Scheme**.

2. Conflict with Rural Zone Code

The proposal seeks approval for a Development Permit for Telecommunications Facility which although we note is a land use anticipated in the Rural Zone (Overall outcome t), the proposal must still demonstrate that it is consistent with the Purpose of the Rural Zone Code.

The purpose of the ***Rural zone*** *code is to:*

a. *provide for a wide range of rural uses including cropping (19), intensive horticulture(40), intensive animal industries(39), animal husbandry(4), animal keeping(5) and other primary production activities;*
b. *provide for non-rural uses that are compatible with agriculture, the environment, and the landscape character of the rural area where they do not compromise the long-term use of the land for rural purposes;*
c. *protect and manage significant natural features, resources, and processes, including the capacity for primary production;*
d. *ensure the rural area remains a pleasant place for people to work, live and recreate;*
e. *restrict further encroachment of urban and rural residential activities into rural areas and reinforce the Regions' identified urban footprint;*
f. *implement the policy direction set in Part 3, Strategic Framework.*

The proposal does not achieve compliance with the above. In particular, the development is not for a rural use and whilst it could be argued it does not significantly compromise the long-

term use of the land for rural purposes, it is incompatible with the environment and landscape character (with respect to visual impacts), threatens the viability of the rural area to remain a pleasant place to live and does not implement the policy direction set out in the Strategic Framework as discussed above.

In addition to the above, the Purpose of the Rural Zone Code is expressed through a number of Overall Outcomes. The proposal is considered to be in conflict with the following Overall Outcomes:

a. A wide range of rural uses, as identified in the table below, are established.

Comment: The proposal is not for a rural use.

i. Development maintains the open area character and scenic amenity, including the low density, low intensity and dispersed built form which defines the rural place type.

Comment: The proposal involves the construction a 50m high structure with ancillary antennas increasing the overall height of the facility to 51m. The height of the structure is excessive and more than double the height of the existing tree canopy. In addition, the structure is situated on the edge of a ridgeline and high point in the locality, somewhere in the vicinity of RL 135m AHD to 140m AHD with the surrounding area generally being of lower topography. The built form in the locality is generally not visible, being low density and integrated within the landscaping. The proposal is completely out of character and inconsistent with the outcome being highly visible and obtrusive.

k. Development does not result in adverse or nuisance impacts on adjoining properties or the wider rural environment. Any adverse or nuisance impacts are contained and internalised to the lot through location, design, operation and on-site management practices.

Comment: The proposed development will result in significant adverse and nuisance impacts on the adjoining properties and wider rural environment mostly in relation visual impacts and loss of vegetation. These matters are discussed in further detail below.

s. Development avoids areas subject to constraint, limitation, or environmental value. Where development cannot avoid these identified areas, it responds by:
- *i. adopting a 'least risk, least impact' approach when designing, siting and locating development in any area subject to a constraint, limitation or environmental value to minimise the potential risk to people, property and the environment;*
- *ii. ensuring no further instability, erosion or degradation of the land, water or soil resource;*
- *iii. when located within a Water buffer area, complying with the Water Quality Vision and Objectives contained in the Seqwater Development Guidelines: Development Guidelines for Water Quality Management in Drinking Water Catchments 2012.*
- *iv. maintaining, restoring and rehabilitating environmental values, including natural, ecological, biological, aquatic, hydrological and amenity values, and enhancing these values through the provision of planting and landscaping, and facilitating safe wildlife movement and connectivity through:*
  - *A. the provision of replacement, restoration, rehabilitation planting and landscaping;*
  - *B. the location, design and management of development to avoid or minimise adverse impacts on ecological systems and processes;*
  - *C. the requiring of environmental offsets in accordance with the Environmental Offsets Act 2014.*
- *v. protecting native species and protecting and enhancing species habitat;*

Comment: The siting of the facility includes a compound with dimensions of 10m x 12m for the facility and ancillary equipment however the notes on the proposal plans state that additional clearing of vegetation is required for access to the facility as well as an additional area of 10m x 20m for construction purposes. We conclude that a cleared area of up to 500sqm may be required. The property and broader locality already contain cleared areas for development and the additional clearing should be avoided. It is anticipated that a more appropriate location for the facility could be chosen that would have lesser impacts in terms of clearing of vegetation.

The proposal also does not comply with the following Performance Outcomes of the Rural Zone Code or insufficient information has been provided to support the proposal:

- PO1: the development does not complement the low-intensity and landscaped character of the zone and the structure is obtrusive and visually dominant in its context.
- PO3: the height of the development is excessive and well beyond the expectations of height in the locality, even for telecommunication facilities which would typically be designed to sit just beyond the height of the tree canopy.
- PO73: insufficient information has been provided to demonstrate that colocation with other existing facilities is not an option.
- PO76: the height of the facility is excessive, more than double the height of the canopy and is positioned on a high point in the context of the immediate surrounding topography. The facility is visually dominant and intrusive in the locality and is not visually integrated with the surrounding area. The compound is sited less than 10m from the closest side boundary and due to its position alongside the existing driveway does not allow for 3m of dense landscaping which is required to sufficiently screen the structures on the ground level.
- PO99: insufficient information has been provided in terms of investigating suitable alternate sites for the facility which could avoid clearing in a high value area (Environmental Areas Overlay). PO99 seeks to avoid clearing in a high value area in the first instance and only contemplates clearing where it is not practical or reasonable to locate the development in an existing cleared area. Insufficient information has been provided by the application in this regard and as a result, we put forward the proposal does not satisfy PO99.

The proposed development is in conflict with several of the Performance Outcomes and Overall Outcomes and as such, the development is inconsistent with the Purpose of the Rural Zone Code and cannot be supported on merit.

Height / Visual Impacts / Scenic Amenity

The excessive height of the structure and the negative visual impacts associated with it are a significant concern for our community. The structure seriously threatens our rural amenity and landscaped outlook, towering over the natural landscape in the most obtrusive way. We have serious concerns that the information provided by the applicant is misleading however the image below confirms that the tower sits significantly higher than (more than double) the tree canopy. The image also shows that the structure is located in an area of higher ground on a ridgeline making it even more prominent in the landscape / skyline.



We have done some research on Council's Planning Development Online (PD Online) records system, looking at other similar applications – our research dates back to around 2013, looking

at the height of telecommunication towers in the Moreton Bay region over the last 5 years. PD Online revealed approximately 50 records of Development Applications for Telecommunication Facilities. Out of the 50 records, only five (5) of those have been proposed at 50m high and all of those were put forward by the *National Broadband Network*. Notably, NBN themselves have several facilities in rural areas proposed at around 40m high and the majority of monopoles during that time were proposed with an average height of 35m. Whilst it is accepted that technology needs change and develop over time, the height and location of the facility must be reconsidered. The applicant should be required to look for alternative locations for the facility that would result in a lower height which would in turn have less impacts on the rural landscape character that is required to be protected.

One can only assume that the height of the structure allows the facility to service a broader area and in turn reduces the amount of facilities required in that area. Whilst it is understood all tiers of Government have an obligation to provide necessary infrastructure to our communities, it cannot be at the expense of and blatant disregard of the rural character and amenity within which we reside.

Alternative Locations

As touched on above, we strongly believe Council should ask the applicant to look for an alternative location which would allow the facility to be lower in height and have less impact on the rural landscape and our community. Section 5.2 of the submitted town planning report touches on the reasons for the proposed location. It states that the proposal requires *only **minor** vegetation clearing and trimming* and that the *location enables the height of the proposed facility to be **restricted** to a 50m slimline monopole* [bolding added for emphasis].

Based on the research undertaken, a 50m high monopole is the highest of its kind in this region; to state that the location "restricts" the height of the structure is false and a misrepresentation of the issue. NBN itself have many facilities with a height of just over 41m so the location chosen requiring a 50m high pole is considered to be one of the poorest choices of location. As has been outlined above, a significant amount of native vegetation is to be removed for the facility, its compound and site access and certainly requires much more than "minor" clearing and "trimming".

In the first instance, the proposal should be refused for its conflict with the planning scheme as already outlined above. But secondly, we would put forward that in considering whether there are sufficient grounds to support the proposal, Council must ask the applicant to demonstrate there is no other suitable location for the facility. Other than for cost efficiencies to the Government, we find it hard to accept the facility could not be relocated to an area which has less impact to our community, both in terms of its visual impacts and loss of high value vegetation.

Loss of Vegetation

Despite the advice from the Department of State Development, Manufacturing, Infrastructure and Planning, Council's planning scheme in its own right looks to protect and maintain areas of high value vegetation. The proposal does not accurately consider the loss of vegetation required and there is insufficient information to support the development in this regard. The latest information provided by the applicant suggests that the removal of just 10 trees is required, however the photos provided and plans both indicate that additional clearing is required. The proposal plans show an area of 120sqm for the compound itself however the notes on the plan suggest than an additional cleared area of 200sqm is required during construction of the facility as well as additional clearing for driveway/site access. We estimate this could require a cleared area of up to 500sqm in an area mapped as having high ecological value. Little to no information is available on the loss of this vegetation and Council's planning scheme requires that clearing of high value vegetation is avoided in the first instance. We put

forward there would be suitable alternate locations for the facility which would have less impacts on the ecological values of the area.

In addition, we note that Council has requested the applicant provide additional information. The applicant states that Council has accepted this information could be provided at a later date, prior to the conclusion of the public notification period. At the time of writing this submission, the information is still not available for the public to review.

We note a landscape plan has been submitted recently. The landscape plan confirms the landscaping is deficient in terms of meeting the minimum 3m landscaped buffer required by the planning scheme and provides very limited information around exactly how many trees need to be removed on the premises.

Summary & Conclusions

The proposed development is inconsistent with purpose of the *MBRC Planning Scheme 2016*, being inconsistent with:

- performance outcomes of the Rural Zone Code,
- the Purpose of the Rural Zone Code (reflected by the Overall Outcomes), and
- the Strategic Framework (and in particular the Mountain Ranges, Forest and Waterway Place Type provisions)

The proposed telecommunication tower is completely out of character with its rural setting. At 51m total height, it sits significantly higher than other telecommunication towers in similar landscapes. In addition, it is positioned on high ground on the edge of a ridgeline at the highest point of the property and requires significant clearing of high value vegetation. The facility will be visually dominant and intrusive in the landscape and photo montages and material put forward by the applicant misrepresents the visual impacts of the structure in the locality.

The proposal conflicts with multiple parts of the MBRC Planning Scheme and whilst telecommunication facilities and broadband services are an essential part of infrastructure in our communities, the proposed facility does not in any way respond to or respect the amenity and values of our region's rural landscape. Council has an obligation to uphold these values as outlined in the relevant policy documents.

I/we strongly object to the proposed development in its entirety and recommend that Council refuse the application and require the applicant to consider a more suitable location for this infrastructure or amend the proposal to be fully compliant with the requirements of its planning scheme.

Dylan Clarke

From: harry thomson
To: MBRC Incoming Mail
Subject: Nbn tower
Date: Monday, 18 March 2019 7:19:24 PM

To Clancy Sloan
This email is in regards to the nbn tower at 230 hipathites road, kobble creek qld 4520 (lot 2 RP162985

I am fully in support of the nbn tower as without it I am not able to get internet access and I know I am not the only person in this situation.

I know the site where the tower is proposed and I believe it is in the best position for the nbn service, and for minimal impact on surrounding residents as it is amongst the trees and nobody can see it from their house except for the people who are having it on there property.

Kind regards
Harry Thomson
0448277492

Sent from my Samsung Galaxy smartphone.

From: Michaela Thomson
To: MBRC Incoming Mail
Subject: NBN tower.
Date: Monday, 18 March 2019 7:23:07 PM

To Clancy Sloan

This email is in regards to the nbn tower at 230 hipathites road, kobble creek qld 4520 (lot 2 RP162985)

I am fully in support of the nbn tower as without it I am not able to get internet access and I know I am not the only person in this situation.

I know the site where the tower is proposed and I believe it is in the best position for the nbn service, and for minimal impact on surrounding residents as it is amongst the trees and nobody can see it from the house except for the people who are having it on there property.

Regards Michaela Thomson.