

Our ref: West Coolup

23 November 2023

Shire of Murray
P O Box 21
PINJARRA WA 6208

Email: info@sjshire.wa.gov.au

Attention: Planning Department

RE: Planning Application - P272/2023
Proposed telecommunications facility - 230 Brownes Road, WEST COOLUP WA 6214

As previously advised, **SAQ Consulting Pty Ltd** acts on behalf Waveconn Operations ('Waveconn') in respect of this application.

Waveconn is a licenced carrier for the purposes of the *Telecommunications Act 1997 (Cth)* and operates as an infrastructure provider or 'neutral host', whereby new facilities are sited, designed, acquired, built and maintained by Waveconn but utilised by carriers - such as the mobile carriers - as part of their respective networks.

The proposal by Waveconn is to establish a telecommunications facility, in the form of a mobile telephone base station (including 40m-tall monopole, antennas and ground-based equipment cabinets) at 230 Brownes Road, WEST COOLUP. The specific location is near the existing driveway from Brownes Road, approximately 770m south of Hart Road, as shown on the attached proposal plans.

The subject land is located within the *Rural Zone* of the Shire of Murray Planning Scheme.

A cover letter was provided at the time of lodgement and this letter constitutes a detailed planning statement as to the merits of the proposal to assist Council in its assessment of the application. The fees have been paid.

Need for the Facility

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

However, it is critical to note that as Waveconn is an infrastructure owner and provider it will not build the structure until a carrier elects to locate on it – that is, the structure will not be speculatively built in the hope it will be collocated on. As such, there will be no impact – visual or otherwise - from the structure until there is a need for it to be constructed. To that end,



SAQ Consulting Pty Ltd

ABN 76 864 757 592

P O Box 50
Clayfield QLD 4011

neither Council nor the community need to be concerned that unnecessary structures will be constructed, regardless of whether there is an approval in place. Notwithstanding, Waveconn is confident that there will be a demand in the near term and seeks an approval on that basis.

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

Figure 1 below shows an extract from www.rfnsa.com.au, which is essentially a database of all existing (and proposed) facilities in Australia and gives a snapshot of existing facilities in the wider area. In short, there are very few facilities serving this area.

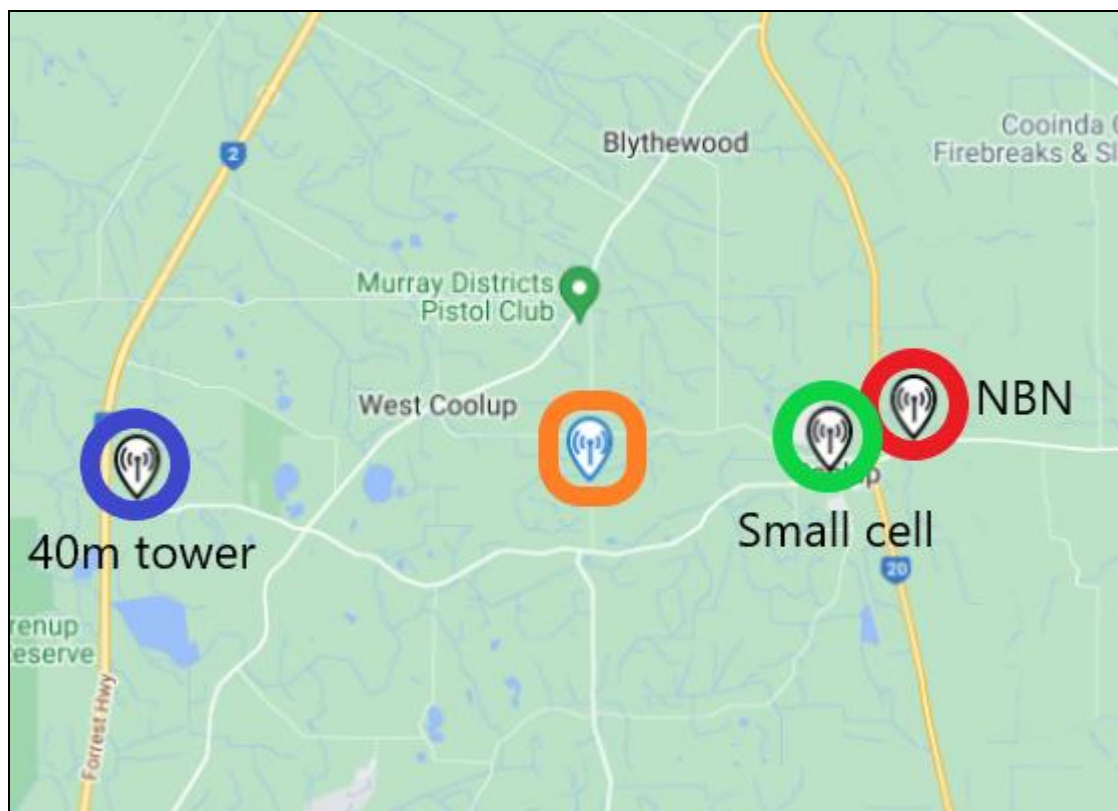


Figure 1: Proposed Location and existing facilities in the surrounding area

In Figure 1, the proposed facility is marked in orange, with the following colours corresponding as follows:

- The green circle is a Telstra 'small cell' mounted on the Coolup Exchange, located approximately 4 kilometres east at 76 Murray Street. Small cells have limited range (up to about 400m) and limited capacity and in this instance would provide some level of service to most of the township. Little if any material coverage would be provided to the rural surrounds from this facility.
- The red circle is an NBN wireless internet facility situated about 1.3 kilometres north-east of Coolup on a 45m-tall monopole. This facility does not provide mobile phone services and is more than five kilometres to the east of the proposed location on Brownes Road.

- The blue circle is a 40m-tall lattice tower located at 284 Herron Point Road, where Telstra, Optus and Vodafone are collocated and from where most of the coverage to the West Coolup rural area is provided. This location is more than seven kilometres from the Brownes Road proposal.

As such, based on the location of the existing facilities the coverage in West Coolup is generally very poor and there will be significant improvements to service in the area through the establishment of the proposed facility. Given there are no existing structures or buildings in the area on which to collocate a new structure is required in this instance.

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

The Proposal

The proposal is to establish a new telecommunications facility in the form of a monopole and ground-based equipment (shelter and cabinets) at the rear of the northern piece of the subject land.

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

- a 40-metre tall monopole located adjacent the existing Brownes Road driveway into the property, about 770 metres south of the Hart Road intersection. The monopole stands within a 12m x 8m compound (96sqm);
- a new triangular headframe mounted at the top of the monopole to accommodate up to nine panel antennas to provide both 4G and 5G services to the area;
- a new 6-bay equipment cabinet (dimensions 2.32m H x 0.75m D x 4.3m L) and a 4-bay equipment cabinet (dimensions 2.32m H x 0.75m D x 2.87m L), both connected to the monopole by a cable tray; and
- stock fencing.

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

No vegetation will be removed as part of the proposal, which benefits from substantial trees alongside Brownes Road the property driveway.

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

The proposed infrastructure will be in compliance with the ACMA EME regulatory arrangements. The facility will also comply with Australian government regulations in relation to emission of electromagnetic energy (EME), this specifically being Australian Standard Radiation Protection Series S-1 Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in 2021.

The Subject Land

The subject land is located at 230 Brownes Road, West Coolup. The land is rectangular in shape, 64.7 hectares in size with a frontage to Brownes Road of about 1.6 kilometres. The land consists of mostly cleared farming land (part of a larger farm over adjoining lots), with a dwelling, outbuildings and farm buildings located roughly in the centre of the Brownes Road frontage.

The subject land's formal description is Lot 72 on Deposited Plan 235004 with Certificate of Title details of 1096/57. The land is located in the *Rural Zone* and the land is partly affected by a Western Power easement, although not the location selected by for the telecommunications facility.

The proposed facility will be near the Brownes Road frontage a short distance to the east of the dwelling, as indicated by Figure 2 below.

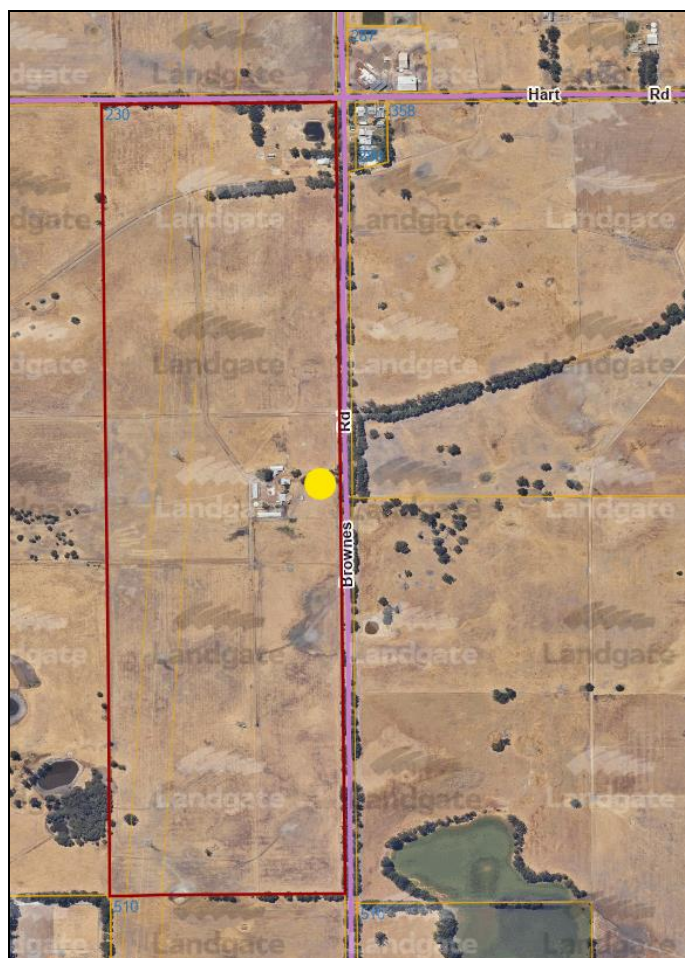


Figure 2 – Subject land and proposed facility location (shown in yellow)

No vegetation requires removal for the establishment of the facility and the location occupied by the proposed facility is not currently used for any particular purpose. Access will be via the existing arrangements from Brownes Road.

The Locality

The locality is a vast farming area stretching from the township of Coolup in the east to Nine Mile Lake and the Forrest Highway in the west. Dwellings (and buildings generally) are sparse and scattered and most of the land used for farming and agricultural is cleared.

As noted above, there are no existing telecommunications facilities in the locality.

Assessment against the Shire of Murray Local Planning Scheme No.4

The subject land and proposed facility are located within the *Rural Zone* pursuant to the local planning scheme, LPS No. 4.

Although a commonly used term, ‘telecommunications infrastructure’ (or similar) is not defined by the Shire’s planning scheme.

However, the proposed facility does fit within the definition of ‘radio/television installation’, which is defined by the planning scheme as meaning the following:

“.....land, structures and buildings used for the relay or transmission of radio, telephone and television signals and includes provision for the generation of, or conversion of power supplies for these purposes.”

The proposed facility is clearly used for the transmission of signals for the purposes of telephone services and therefore comfortably fits within this definition.

The zoning table does not identify the permissibility or other of the definition ‘radio/television installation’, which means Council may decide, pursuant to subclause 5.2.3, if the proposed facility is consistent with the objectives of the *Rural Zone* and must also determine whether advertising procedures (subclause 5.2.2) are applicable.

The Rural Zone does not have any specific provisions within the planning scheme and in fact there are exemptions for rural-type/minor development where no clearing is required (as is the case here) and no specific approval is required.

However, a reading of the planning scheme as a whole makes it plain that the Shire’s objectives are to ensure the agricultural area is protected and ensure the orderly and proper development of the zone.

The planning scheme also sets out the re-zoning process from ‘rural’ to ‘special rural’, but this is not considered necessary for such a straightforward application and land use.

As such, there are no specific provisions or policies to assess the proposed facility directly against, but in a more general sense, the following comments are made to assist Council in its task:

- Telecommunications facilities are essential infrastructure

- Telecommunications facilities are regularly found in rural zones and areas
- The provision of improved telecommunications arising from the proposed facility is consistent with both the General Objectives (set out at subclause 2.1) and the Specific Objectives (set out at subclause 2.2) of the Planning Scheme
- The proposed facility is set back from Brownes Road, is screened to some extent by roadside vegetation and is more than 600 metres from the nearest dwelling (not on the subject land) – as such, its visual impact on adjoining properties has been minimised
- The proposed facility occupies a very small part of the subject land and has no impact on the on-going agricultural viability of the subject land or any nearby land
- No clearing of vegetation is necessary to establish, operate or maintain the proposed facility
- There is no impact on water resources, waterways or the like

As such, it is considered that the proposed use is consistent with the *Rural Zone* and given the large separation from more sensitive land uses (more than 600 metres), it is open to Council to grant approval without the need for advertising procedures – although if these were to occur it is unlikely any material concerns would be raised by the community.

There are no provisions with part 7 of the planning scheme (general provisions) that are directly relevant to the proposal, but subclause 7.1.2 allows Council to consider the merits of such matters as setback, site coverage etc. as it sees fit.

State Planning Policy 5.2 – Telecommunications Infrastructure

Western Australia has a State Planning Policy relating to telecommunications known as SPP 5.2, the background to which states:

Adequate and reliable telecommunications are essential for all aspects of contemporary community life, from supporting the State's economy to creating and maintaining connected and cohesive social networks. Contact between emergency services and the community increasingly relies on the telecommunications networks.

The importance of telecommunications services in Western Australia is recognised in the Western Australian Planning Commission's (WAPC's) State Planning Strategy 2050 (2014), which advocates for the provision of an effective state-wide telecommunications network. This network includes both above and below ground infrastructure to support both fixed line and wireless telecommunications.

(emphasis added)

The proposal and its rationale set out above is consistent with the policy principles set out in the SPP, which seeks to minimise the visual impact of such facilities through siting and design and facilitate improved telecommunications services to the community.

The assessment of the proposal against SPP5.2 is as follows:

5.1.1 The benefit of improved telecommunications services should be balanced with the visual impact on the surrounding area.

This outcome has generally been achieved as set out above. Further:

- the visual impact has been assessed with specific regard to this proposal and surrounding land uses;
- the location selected is not prominently visible from a significant viewing location, including scenic routes, lookouts and recreation sites;
- the proposal does not detract from heritage items or landmarks and has been sited to minimise its impacts on streetscapes, particularly those in the residential areas to the east;
- the proposal is not located on land where environmental, cultural heritage, social and visual landscape values are compromised;
- the external colours and finishes can be selected to be sympathetic to the surrounding landscape, which in this location is at the commercial/residential interface;
- the location selected will facilitate new and improved telecommunications services to the community; and
- no collocation opportunities are available (but the facility will be designed to facilitate collocation).

All application requirements set out under 6.3.1 have been addressed.

As such, the proposed facility demonstrates a high level of compliance and consistency with SPP5.2, which is the pre-eminent document against which such infrastructure must be assessed in Western Australia.

Other State Planning Policies

The land is subject to SPP2.1 Peel-Harvey Coastal Plain Catchment Policy and SPP2.4 Basic Raw Materials Policy. Neither of these are relevant in this instance.

Conclusion

The proposed facility at 230 Brownes Road, West Coolup will provide significantly improved network coverage in the rural areas of West Coolup, which is currently inadequately served due to the distant location of existing infrastructure in the wider area.

The current arrangement and amount of telecommunications infrastructure in the wider locality is not consistent with meeting modern demands for telecommunications and existing facilities cannot be upgraded or expanded to improve the situation. The need for the facility has been set out above and it has been demonstrated there are no suitable collocation opportunities in the area.

The proposed facility has been designed and sited to minimise its impact on the locality through its setback from Brownes Road and more sensitive land uses and the use of existing vegetation for screening.

The *Rural Zone* is an appropriate zone type for the facility both in terms of typical zone hierarchy and the proposal also demonstrates consistency with the stated objectives for the planning scheme.

The proposed use will have no material impact on the use of the subject land or the use of adjoining land. The proposal is also consistent with the policy outcomes desired by the State as set out in State Planning Policy 5.2

Accordingly, the proposal represents an orderly placement and development of what is now an essential piece of modern infrastructure and I consider the subject proposal warrants planning consent.

Should you have any questions, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Baade', is positioned below the 'Yours sincerely' text.

MARK BAADE

B. Plan (Hons)

M: 0417 088 000

mark@sagconsulting.com.au