

Telstra C/- Visionstream Pty Ltd

Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2 metres and associated ancillary cabling and equipment located to the Henley Beach Road boundary

2 May Terrace (Kooyonga Golf Course), Lockleys

211/L025/18

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OVERVIEW

Application No	211/L025/18
Unique ID/KNET ID	#13641151 / 2018/22448/01
Applicant	Telstra C/- Visionstream Pty Ltd
Proposal	Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2 metres and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Subject Land	2 May Terrace (Kooyonga Golf Course), Lockleys
Zone/Policy Area	Community Zone / Recreation Policy Area 8 / Open Space Precinct 8
Relevant Authority	State Commission Assessment Panel
Lodgement Date	19 November 2018
Council	City of West Torrens
Development Plan	West Torrens Council Development Plan consolidated 12 July 2018
Type of Development	Merit
Public Notification	Category 3
Representations	Eighteen (18) representations, seven (7) wishing to be heard
Referral Agencies	Commissioner of Highways, Adelaide Airport Limited
Report Author	Ben Williams, Planning Officer
RECOMMENDATION	Development Plan Consent subject to conditions

EXECUTIVE SUMMARY

The proposal seeks Development Plan Consent to construct a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2 metres and associated ancillary cabling and equipment located at 2 May Terrace, Lockleys (Kooyonga Golf Course).

Pursuant to Schedule 10 Clause 10 of the *Development Regulations 2008*, the State Commission Assessment Panel (SCAP) is the relevant authority for the development application because the proposal would be undertaken on land which is subject to a proclamation by virtue of the *Statutes Repeal and Amendment (Development) Act 1993*.

The subject land is located wholly within the Community Zone, Recreation Policy Area 8 and Open Space Precinct 8 of the West Torrens Council Development Plan. The application is a merit form of development as a 'telecommunications facility' is not listed as either a complying or a non-complying form of development within the zone.

The development application was assigned to Category 3 for the purposes of public notification pursuant to Section 38 of the *Development Act 1993* with eighteen (18) representations received, 1 in support and 17 objections raised as a result of notification.

The applicant has responded to comments from the City of West Torrens regarding the location of the proposed telecommunications facility, however Council does not raise any serious objections with the proposal. In addition, the Commissioner of Highways and Adelaide Airport Limited have not fundamentally objected to the proposal.

It is considered that the proposed telecommunications facility is appropriately designed and sited to minimise visual impact in the locality and will not prejudice the continuance of the existing use or future development on the subject land. Overall, it is considered that the proposal is not seriously at variance with the relevant provisions of the West Torrens Development Plan and warrants the granting of Development Plan Consent.

ASSESSMENT REPORT

1. BACKGROUND

1.1 Strategic Context

The development is proposed to be undertaken within the grounds of the Kooyonga Golf Course. The Golf Club is a longstanding community use (paid membership) offering golfing activities since 1923 within the suburb of Lockleys.

The zoning of the subject land has varied over time, however the prevailing zoning has retained policy that ensures the continuance of private recreation land for golfing activities. The current zoning was established through the Better Development Plan (BDP) and General Development Plan Amendment (DPA) consolidated on 18 August 2011.

1.2 Reason for Application

The applicant has advised the proposed telecommunications facility is intended to replace the existing Telstra telecommunications facility located at 1 May Terrace, Brooklyn Park (Anglican Church), which will be decommissioned in the event planning approval is obtained for the new facility.

The applicant undertook investigations into five (5) alternate candidate sites, including one (1) potential co-location option as part of the process. The location of the proposed development has been chosen by the applicant as the preferred location to replace the coverage of the existing facility at 1 May Terrace, Brooklyn Park and will provide for a greater range of coverage to the area of Lockleys at the new site location.

2. DESCRIPTION OF PROPOSAL

Application details are contained in **Attachment 3**. The proposal is for the following:

- Install one (1) 25m Monopole, with an overall height no greater than 26.2m;
- Installation of a triangular headframe;
- Install nine (9) new panel antennas (no greater than 2.8m in length);
- Installation of one (1) Telstra Equipment Shelter, that is not more than 3m high with a base area of not more than 7.5m² at the base of the aforementioned monopole;
- Installation of associated ancillary cabling and equipment; and
- Install a new 2.4m high chain-link mesh fence (dimensions 6m x 10m) surrounding the Telstra compound, with a 3m wide access gate.

Access to the proposed development will be via Henley Beach Road via a new crossover and access gate. No lighting or illumination is proposed to be installed as part of the development

No regulated or significant trees will be removed a part of the proposal. Minor pruning of existing vegetation will be required and is not considered to be substantial.

3. SITE AND LOCALITY

3.1 Site Description

Lot No	Plan No	Street	Suburb	Hundred	Title
A72	FP13171	May Terrace	Lockleys	Adelaide	CT 5323/509

The telecommunications facility is proposed to be located on privately-owned land at 2 May Terrace, Lockleys SA 5032. The proposed development would occur within the grounds of the Kooyonga Golf Course and would be located to the north/north east of the existing built form on site within a well-established vegetation screen (large trees), adjacent Henley Beach Road.

The subject land comprises (56.3 hectares), is of an irregular shape and is considered to be predominately flat at the specific site of the proposed telecommunications facility. The subject land has frontage to Henley Beach Road (approx. 455m), May Terrace (approx. 475m) and Sir Donald Bradman Drive (approx. 634m).

The Adelaide Airport is located approximately 800 metres south of the proposed location of the monopole and the immediate locality is characterised by residential development and commercial land uses.

The subject land is currently used for recreational purposes as a golf course. Built form on the site includes two sets of outbuildings including clubrooms and storage areas to support existing recreational activities on site. The outbuildings on site are located approximately 350m from the proposed facility.

The site is not located in an area of environmental significance as defined by *The Telecommunications (Low-Impact Facilities) Determination 1997*. Access to the site is currently via May Terrace only to the west.

The proposed development would be sited on the subject land behind existing large trees and electricity infrastructure as shown in Figures 1 & 2 below and **Attachment 2**. Further detailed site photos provided by the applicant are contained within the application details provided in **Attachment 3**.



Figure 1: Location of proposed facility



Figure 2: Photo Montage Example

3.2 Locality

Development in the locality comprises:

- **North**
Predominantly residential development including a local shopping precinct (Local Centre Zone) on the corner of Henley Beach Road and Torrens Avenue. The proposed monopole would be located approximately 50m from the nearest residential property to the north.
- **East**
Predominantly residential development including a Commercial Zone and Local Centre Zone on the corner of Henley Beach Road and May Terrace.
- **South**
The subject land is adjacent to the Adelaide Airport, with the proposed facility approximately 800m from Airport operations.
- **West**
Residential development abuts the site at Willingale Avenue and Henley Beach Road. The proposed monopole would be located approximately 30m from the nearest residential property to the west.

It is acknowledged that the upper portion of the facility would be visible from adjoining residential development. The presence of existing vegetation on site would assist with minimising any potential visual impact when viewed from adjoining residential uses.

Figure 3 (below), identifies the subject land within the context of the local area as well as the location of the proposed facility.



Figure 3 – Location Map within the context of wider locality

4. STATUTORY REFERRAL BODY COMMENTS

Full copies of referral agency responses are contained in **Attachment 4**.

4.1 Safety and Services Division, DPTI

DPTI is a mandatory referral in accordance with Schedule 8 of the *Development Regulations 2008*. The State Commission Assessment Panel must have **regard** for the advice provided.

The Transport Assessment and Policy Reform section of DPTI provided advice on the application on 4 January 2019 and indicated its general support for the proposal, subject to the following conditions and advisory notes:

- All vehicles shall enter and exit the site in a forward direction.
- Stormwater run-off shall be collected on-site and discharged without jeopardising the safety and integrity of Henley Beach Road. Any alterations to the road drainage infrastructure required to facilitate this shall be at the applicant's expense.
- Should traffic flows on Henley Beach Road be expected to be impacted during construction, the applicant must contact DPTI's Traffic Management Centre on telephone 1800 013 313 to obtain the necessary permit for works on/or adjacent to the arterial road. A Traffic Management Plan may be required in order to safely manage traffic flows along this section of the road.

Accordingly, conditions and advisory notes as recommended will be attached to any consent granted.

4.2 Adelaide Airport Limited

The Commonwealth Secretary for the Department of Transport and Regional Services is a mandatory referral in accordance with Schedule 8 of the *Development Regulations 2008*. The State Commission Assessment Panel must follow the **direction** of this advice.

Adelaide Airport Limited, on behalf of the Commonwealth Secretary for the Department of Transport and Regional Services, provided advice on the application on 17 December 2018 raising no objections to the proposed development subject to the following advisory notes being attached to any approval:

- The monopole at a height of RL32.2m Australian Height Datum (AHD) as described would not penetrate the Adelaide Airport Obstacle Limitation Surface (OLS) airspace protected for aircraft operations. Any further proposed addition to the structure, including aerials, masts and vent/exhaust stacks, must be subject to a separate assessment.
- Crane operations associated with construction shall be the subject of separate application. Adelaide Airport Limited requires 48 days prior notice of any crane operations during the construction. Assessment of associated crane operations may also have to be conducted by the Civil Aviation Safety Authority (CASA).

- Restrictions may apply to lighting illumination. Any lighting proposed shall conform to airport lighting restrictions and shall be shielded from aircraft flight paths.

The applicant provided a response to the referral advice provided by Adelaide Airport Limited on 11 February 2019 and confirmed that no lighting is proposed to be installed as part of the development. Accordingly, the recommended advisory notes will be attached to any consent granted.

5. COUNCIL COMMENTS

5.1 City of West Torrens

The application was referred to the City of West Torrens for comment. Council provided a response on 30 November 2018 and did not object to the proposed development, providing the following comments:

- From a visual perspective, Council would prefer to see the tower located further into the site and away from public space along Henley Beach Road, notwithstanding the options considered for co-location and other candidate sites that need to satisfy the requirements of the installation.
- Council concurs that the existing vegetation will screen the equipment shelter and ground infrastructure as well as the lower portion of the proposed monopole to some degree, however given the 26 metre overall height there will be unavoidable visual impact on the locality. Relocating the monopole an additional 10-15m further south into the site, if possible, would assist in further screening the infrastructure from public spaces.

On 12 December 2018, the applicant provided a response to Council's request to reposition the facility 10-15m to the south of the proposed location:

In regards to Council's comments on the proposal for a telecommunications tower at 2 May Terrace, Lockleys, the facility has been moved as far as practical away from the road frontage as possible. This has been previously negotiated with the land owner, as the tower being pushed any further south would encroach on the golf course area/general play area- which is not supported by the land owner as it would create a much larger visual impact upon the established recreational area.

Furthermore, the movement of the facility away from the road would create very little further screening from the public spaces from the north, but create a great impact upon the recreational area of the golf courses playing area.

The proposed detailed siting seeks to achieve the best balance between minimising the potential visual impact of the proposal, while not detracting from the established use of the land while remaining capable of achieving the coverage objectives necessary for the proposal. On balance, it is my view that the proposed location successfully balances these objectives.

Council formally provided a second response on 12 December 2018 and had no further comment to make regarding the proposed development. Full copies of Council responses are contained in **Attachment 5**.

6. PUBLIC NOTIFICATION

The application was notified as a Category 3 development (pursuant to Section 38(2)(c) of the Development Act 1993 – i.e. neither Category 1 or 2). Public notification was undertaken (by directly contacting adjoining owners and occupiers of adjacent land, those potentially affected to a significant degree and via public notice in *The Advertiser* on 21 December 2018) and 18 valid representations were received as shown below in Figure 4.



Figure 4 – Representation Map

Concerns raised by the 18 valid representors, and responses provided by the applicant are outlined in the table below (complete copies of the representations are provided in **Attachment 6**):

Representor ID	Issue
R1	<ul style="list-style-type: none"> Supports the proposed development
R2	<ul style="list-style-type: none"> Concerns regarding health impacts associated with the proposed development Visually unappealing Suggests relocating the facility
R3	<ul style="list-style-type: none"> Negative impact on visual amenity Concerns regarding health impacts associated with the proposed development Located too close to residential development
R4	<ul style="list-style-type: none"> Location of tower too close to Henley Beach Road Will not add to the desired character of the area Suggests relocating the facility
R5	<ul style="list-style-type: none"> Oppose the development

Representor ID	Issue
R6	<ul style="list-style-type: none"> • Concerns regarding health impacts associated with the proposed development • Reconsider the location of the proposed tower • Concerns regarding the visual impact of the proposal
R7	<ul style="list-style-type: none"> • Concerns regarding health impacts associated with the proposed development
R8	<ul style="list-style-type: none"> • Lists the proposed development as dangerous • Proposal is considered to be unsightly • Concerns regarding health impacts associated with the proposed development
R9	<ul style="list-style-type: none"> • Concerns regarding health impacts associated with the proposed development • Lists the proposed development as dangerous
R10	<ul style="list-style-type: none"> • Concerns with the visual impact of the proposed development • Incompatible with surrounding environment • No positive contribution to the character of the area • Proposed facility should only be located in residential areas if appropriately designed and sited to minimise visual impact • Inconsistent with the Development Plan
R11	<ul style="list-style-type: none"> • Traffic hazards will arise as a result of the proposed development • Consideration should be given to an alternate location
R12	<ul style="list-style-type: none"> • Views are obstructed • Reduces property value • Concerns regarding health impacts associated with the proposed development
R13	<ul style="list-style-type: none"> • Concerns regarding health impacts associated with the proposed development • Negative impact on the aesthetics of the area
R14	<ul style="list-style-type: none"> • Not an appropriate location for the proposed development • Unpleasant to view and considered to be an eyesore • Will not add value to the area • Property values will be affected • Consideration should be given to relocating the tower
R15	<ul style="list-style-type: none"> • The proposed location of the tower will be an eyesore on the area • Consideration should be given to relocating the tower
R16	<ul style="list-style-type: none"> • Construction/height and health risks associated with the proposed development • Outlined that an existing tower is already located at 1 May Terrace, Brooklyn Park
R17	<ul style="list-style-type: none"> • Oppose the development
R18	<ul style="list-style-type: none"> • Concerns regarding health impacts associated with the proposed development • The proposed location of the tower will be an eyesore on the area • Consideration should be given to relocating the tower
Applicant's Response to Representations	
<p>The applicant has provided a very extensive and detailed response to all matters raised by representors. It is noted that most representors held similar concerns with respect to the proposal, with the primary concerns relating to:</p> <ul style="list-style-type: none"> • Health impacts associated with the proposed development; • The proposed facility is not an appropriate location and will impact the character and amenity of the area; • Consideration should be given to relocating the tower in an alternate location; • Traffic hazard to motorists on Henley Beach Road; and 	

Representor ID	Issue
	<ul style="list-style-type: none"> • Devaluation of property. <p>A summary of the applicant's responses are provided below:</p> <p><u>EME & Health</u></p> <p>The Electromagnetic Energy (EME) report available on the Radio Frequency National Site Archive site advises that the maximum predicted EME level following the installation of the proposed telecommunication facility located at 2 May Terrace, Lockleys will be 2.23% of the Australian RPS3 safety standard. Previous EME measurement surveys for other areas have shown that actual EME levels are significantly below the predicted levels.</p> <p>All mobile phone base stations must adhere to strict safety regulations set by the Australian Communications and Media Authority. The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) standard provides reference levels for the safety of all people, including children. These levels are determined to be safe for 24-hour, 365 days a year exposure.</p> <p>The applicant relies on the expert advice of international and national health authorities including the World Health Organization (WHO) and ARPANSA for overall assessments of health and safety impacts. The International Commission on Non-Ionizing Radiation Protection has issued guidelines on levels of allowable public exposure to Radio Frequency (RF) fields, including guidelines on RF from mobile phones and base stations that Telstra adheres to.</p> <p><u>Visual Impact</u></p> <p>The location of telecommunications facilities to service urban and suburban communities is nowadays commonplace. The applicant respectfully disagrees with representors' argument that the proposal unreasonably impacts the locality of the area.</p> <p>Telstra seriously considers the visual impact when siting and designing telecommunications facilities. Given that clear line of sight is integral to the functioning of any telecommunications facility, it is not possible to completely mitigate all impacts on surrounding view sheds. The applicant asserts that a balance must be struck between amenity and service, without undue compromise to either. Accordingly, the proposal has sought to implement a balance at The Kooyonga Golf Club by choosing a location that best minimises the potential visual impact of all identified candidates investigated and outlined in summary above.</p> <p>In addition, the site has been located to maximise existing vegetation screening of the facility while locating as far as practically possible away from sensitive land uses.</p> <p><u>Property Value</u></p> <p>Some submissions have raised potential impact on property values as grounds for objection. While this concern is not a ground for town planning compliance/assessment it is clearly a consideration for some members of the community. The issue of property value is an extremely complex one, with fluctuations in price being subject to a vast number of factors – many of which are subjective such as amenity, access to transport, condition of land improvements, views and increasingly the quality/availability telecommunications services.</p> <p>The issue of property value is an extremely complex one, with fluctuations in price being subject to a vast number of factors – many of which are subjective such as amenity, access to transport, condition of land improvements, views and increasingly the quality</p>

Representor ID	Issue
	/availability telecommunications services. However, often more significant are broader market forces affecting supply and demand for housing. Unlike a transmission line or power easement, utility installations such as telecommunications facilities do not materially affect the ability of adjoining landowners to develop or enjoy the use of their properties.
	It is further noted that since the mid 1990's, there have been thousands of telecommunications facilities developed throughout Australian metropolitan and regional areas. During this period, property values across the board have continued to increase, showing no sign of deterioration as a result of specific factors such as the location of telecommunications base stations. The improvements to mobile network connectivity resulting from improved service coverage is likely to be very significant, which will in turn support business, health, education and a range of other sectors.
	Notwithstanding, Telstra is not aware of any credible evidence that directly links the siting of a telecommunications facility to either an increase or a decrease in property prices.
	Traffic Hazards
	In regard to the monopole being a distraction to drivers, Telstra respectfully disagrees with this line of argument. It is common place for monopoles to be located within proximity to roads such as Henley Beach Road, in saying this, the facility is set back from the road front and does not impact upon the road reserve. Additionally, with there being a number a vertical structures along the road reserve, the monopole does not unreasonably impact on the surrounding environment and particularly when viewed from along Henley Beach Road.
	While the access route will be utilised approximately 3-4 times annually for maintenance purposes, the crossover will not be subject to significant traffic generation. The entry point and driveway has also been designed for vehicles to enter and exit in a forward direction, to ensure safe access to and from the facility.
	Alternate Sites
	The Development Application identified five (5) alternative candidate locations investigated as part of the site selection process before determining that the proposed location is the only practicable and viable option available to meet the need for the service.
	In summary, of the five candidates, four (4) of the candidates had the same land owner, being The Kooyonga Golf Club (2 May Terrace, Lockleys) which is not interested in any of the alternate candidates, being candidates C1, C2, C4. Additionally, Candidate C4, which was located on the Sir Donald Bradman Drive, was too far south and outside the coverage area, failing to meet RF requirements. The other candidate (candidate A) failed to meet the structural design with the available space on the rooftop.
	Possible locations were raised within the representations which included locations along Sir Donald Bradman drive and the Ikea Car park. These locations are both too far south of the targeted coverage area and did not meet the RF requirements for the area; this was reflected as option C4 (located on Sir Donald Bradman Drive) did not meet the coverage requirements.
	The preferred location (the subject of the development application), including the above-mentioned design changes, seeks to balance potential visual impacts as much as technically feasible while maintaining the necessary coverage objectives necessitating

Representor ID	Issue
	<p>the development. The proposed location is considered a satisfactory balance of these requirements. In particular, the development site is already located as far as practicably away from more sensitive land uses, will be very well screened by existing tall trees on the subject site and the structure will be as small as practically necessary.</p> <p><u>Need for the Facility</u></p> <p>The primary objective of the facility is to replace coverage from an existing monopole site at Brooklyn Park West and expand coverage to surrounding areas. The facility will also extend the coverage of the original facility and bring enhanced performance to the target area. The performance objectives include strengthening depth of coverage and future expansion/technology, and preventing interference and dropouts.</p> <p>Telstra asserts it works diligently to find a balance between providing high quality services and minimising our impact on the community and the local environment. In addition to technical requirements, Telstra has taken into account a number of other important non-technical criteria when selecting the site, including the potential to co-locate at an existing telecommunications facility; the potential to locate on an existing building or structure; the minimisation of EME from the facility, the visual impact on the surrounding area and the need to obtain relevant town planning approvals; the proximity to community-sensitive locations and areas of environmental heritage or significance; and the type of and ability to secure tenure at the site. The tower height is to ensure the optimum coverage for the area, being what is required to service the target coverage area. Additionally, with the surrounding area consisting of substantial vegetation the antennas must be able to service the area without interference or disturbance.</p>

A total of seven (7) representors wish to be heard by the State Commission Assessment Panel.

One (1) representation was also received by the State Commission Assessment Panel, but was assessed as being invalid (in accordance with the *Development Regulations 2008*) as it was received after the close date.

A complete copy of the applicant's response document is included in **Attachment 7**.

7. POLICY OVERVIEW

The subject site is within the Community Zone, Recreation Policy Area 5 and as described within the West Torrens Development Plan consolidated 12 July 2018.

Relevant planning policies are contained in **Attachment 8** and are summarised below.

7.1 Recreation Policy Area 5 / Open Space Precinct 8

The subject land is located within the Recreation Policy Area 5, a policy area which seeks to provide for sporting, entertainment, cultural and recreational activities and associated spectator and administrative facilities. The policy area seeks integrated recreational areas and facilities that accommodate a range of activities accessible to the community.

Furthermore, the subject land is located within Open Space Precinct 8 which accommodates private recreation land and open space for a range of active and passive recreational land uses. This precinct envisages the continued development of the existing golf courses for active recreation as international and national championship private courses with associated ancillary facilities.

7.2 Community Zone

The subject land is located within the Community Zone, a zone which seeks to provide for community, educational, recreational and health care facilities for the general public's benefit. Development should contribute to the desired character of the zone. In addition, the zone outlines that development should not be undertaken if it would inhibit or prejudice the integrated development of land within the zone for further community and institutional uses.

The Community Zone is silent on the Development Plan's expectations regarding telecommunications facilities and therefore policies contained within the General Section (Telecommunications Facilities) module are considered to be pertinent for the assessment of this proposal.

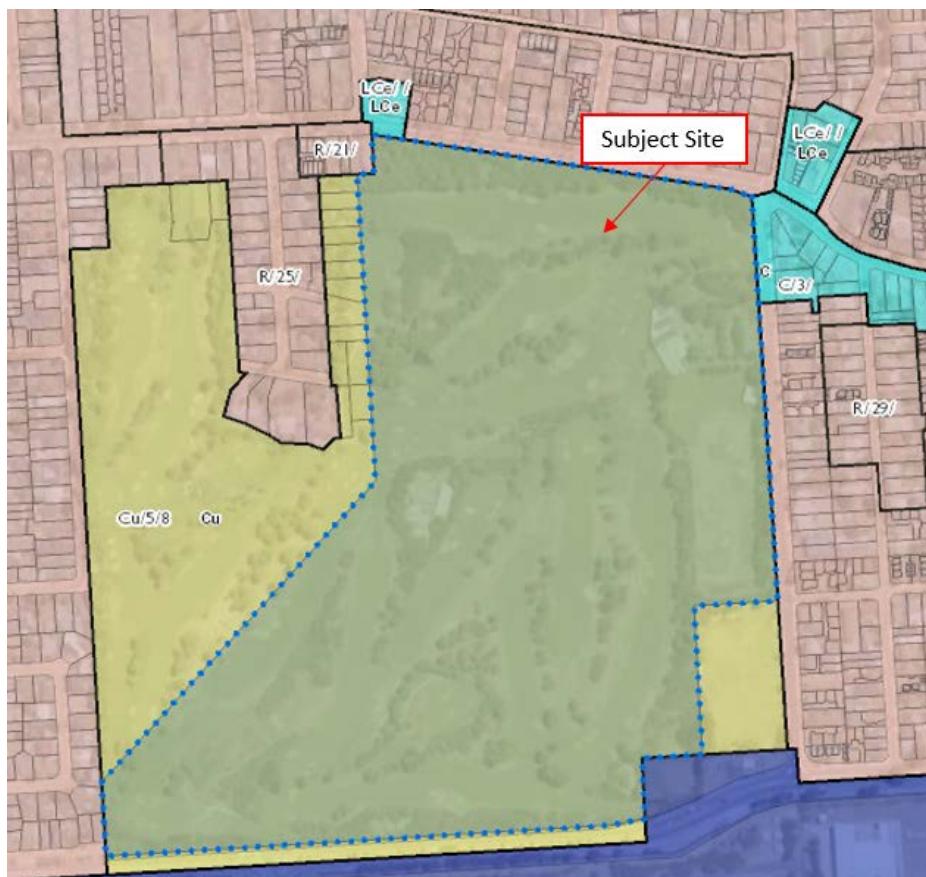


Figure 5 – Zoning Map

7.3 Council Wide

General Section provisions of relevance provide guidance related to the requirement and location for a telecommunications facility, design and appearance, infrastructure, interface between land uses, orderly and sustainable development, siting and visibility. The following objectives from the General Section (Telecommunications Facilities) module are of particular relevance:

- Objective 1 – Telecommunications facilities provided to deliver communication services to the community
- Objective 2 – Telecommunications facilities sited and designed to minimise visual impact on the amenity of the local environment.

7.4 Overlays

7.4.1 Airport Building Heights

The subject land is located within 'Zone C' on Overlay Map WeTo/3 - Development Constraints, requiring all proposed structures exceeding 15 metres above existing ground level to be referred to The Commonwealth Secretary for the Department of Transport and Regional Services.

8. PLANNING ASSESSMENT

The application has been assessed against the relevant provisions of the West Torrens Council Development Plan (consolidated 12 July 2018), which are contained in **Attachment 8**.

8.1 Land Use and Zoning

The application seeks development plan consent for the construction of a 26.2m monopole, with associated ancillary cabling and equipment located within the grounds of the Kooyonga Golf Course. The subject land is within the Community Zone which seeks to provide for recreational facilities for the general public's benefit.

In considering the suitability of the proposal in the context of the Community Zone, the following matters are considered to be relevant when undertaking the assessment:

- Whether the proposed development is necessary for community needs; and
- Whether the proposed development inhibits or restricts the existing land use.

Need for the facility

Although the proposed development is not specifically envisaged within the zone, the Development Plan seeks appropriately sited Telecommunications Facilities to meet the needs of the community and to be co-located where technically feasible. The proposed facility is required to provide for essential communications services to the area of Lockleys and would have a considerable public benefit when operational.

The facility is required to replace an existing facility located at 1 May Terrace, Brooklyn Park (located on the site of the Anglican Church) which is proposed to be decommissioned if planning consent is granted to the subject application. In addition to the improved coverage, the applicant has indicated that the new facility will allow for improved network access for future use and co-location opportunities in accordance with PDC 1(a) of the General Section (Telecommunications Facilities) module.

Furthermore, it is considered that the applicant has undertaken sufficient investigations into alternate locations for the facility (discussed further in Section 8.3) and the proposed facility/shelter would be appropriately located on the subject land to assist in minimising visual impact on the surrounding residential area. On this basis it is considered that the proposal is in accordance with Objective 1 of the Community Zone and Objective 1 & 2 of the General Section (Telecommunications Facilities) module.

Impact on existing land use

The proposed telecommunications facility would be located in the north/north-east portion of the Kooyonga Golf Course (allotment size 56.3ha). The facility is proposed to be housed within a 10m x 6m standard security fence with 3m wide double access gates, which is considered to be of a small size in the context of the overall allotment.

The site selection is considered to be appropriate, within a well-established area of vegetation and in close proximity to the perimeter of the allotment adjacent the boundary of Henley Beach Road.

The site of the development is considered likely to deliver optimum telecommunications coverage to the area of Lockleys and will not prejudice the continuance of the existing use or future development on site in accordance with Objective 2 of the Community Zone. Accordingly the proposal is seen to be suitable with respect to land uses envisaged for this location.

8.2 Appearance and Visual Impact

A key planning consideration relates to the visual impact of the proposed facility and the need to ensure the structure would not dominate or detract from the prevailing character and amenity of the locality. It is acknowledged that the proposed telecommunications facility will inevitably introduce a visual presence in the locality, however it has been sited and designed to minimise the expected visual impact as much as technically possible without compromising the facility's functional performance and operability.

The proposed development would be sited approximately 30m from the nearest residential property to the west and approximately 50m from the nearest residential property to the north, which the applicant argues is as far as feasibly possible away from sensitive land uses while being able to utilise established vegetation to assist in visual screening for the development.

In support of its proposal the applicant has made reference to several Court rulings which outlined how a relevant authority is to consider minimisation of the visual amenity impact of telecommunication facilities including ERDC Telstra LTD v City of Onkaparinga (2013) SAERDC 28, Telstra Ltd v Town of Gawler (2009) SAERDC 2 and FCSC in Hutchison 3G Australia Pty Ltd v City of Mitcham (2005).

In addition to Case Law referred to by the applicant, ERD Court decision of Bettcher v City of Charles Sturt & ANOR [2013] SAERDC 39 (14 August 2013) is also of relevance to this application as it related to a third party appeal against approval of a telecommunications facility within a Mixed Use Zone adjacent to a Residential Zone. In that matter, the Court's deliberations involved consideration of similar issues to the subject application including the recognised need for the facility and the perceived visual impact in close proximity to a Residential Zone.

The Commissioner's finding stated:

'That the proposed facility is required to meet the needs of the community for telecommunications services. I am further satisfied that the Mixed Use Zone is an appropriate zone for such a facility and that the location for the proposed facility in this Zone is preferable to a location within the Residential Zone. I acknowledge that the site selected is very close to the Residential Zone boundary, but I accept the evidence, largely unchallenged by the Appellant, that there is no available alternative site which is suitable from a radio engineering perspective.'

'Given the required height of the proposed monopole and its associated antennae, it will inevitably be visibly intrusive and is likely to impact adversely on the amenity of the Appellant's properties and of the locality more generally. However, I am satisfied that some visual impact is unavoidable and that, in the design of the proposed facility, all that is possible has been done to minimise this impact.'

In short, the Courts have resolved that the extent of visual impact associated with telecommunications infrastructure proposals needs to be considered relative to the

availability of alternative sites, including low impact facilities. The applicant has considered five (5) alternate locations which are further discussed below.

Furthermore, a number of representors raised concerns regarding the visual impact of the monopole when viewed from Willingale Avenue. In response, the applicant has provided the following photo montage for the Panel's consideration:



Figure 6: View from Willingale Avenue towards proposed development

In having regard to the development's physical appearance, it is considered that appropriate materials and colours would be used to minimise the visual impact on the locality. The monopole is proposed to remain unpainted (being a concrete non-reflective colour), the fencing/entry gate will replace like for like with the existing perimeter fence and the equipment shelter is proposed to have a green finish to complement the existing vegetation on site.

On balance, it is considered that the proposed facility is appropriately designed and sited to provide for optimal service provision to the Lockleys area whilst adequately minimising visual impact on the surrounding locality in accordance with Objective 2 of the General Section (Telecommunications Facilities) module.

8.3 Alternate Locations

General Section (Telecommunications Facilities) module PDC1(e) states that 'Telecommunications Facilities should where technically feasible, be co-located with other telecommunications facilities'. The applicant has carefully examined a range of possible alternate sites in the immediate locality to replace the existing facility at 1 May Terrace, Brooklyn Park including one (1) potential co-location option.

The applicant has indicated that the first preference for any new proposal is to utilise, where possible, any existing infrastructure or co-location opportunities as required by the Mobile Phone Base Station Deployment Industry Code (C564:2011).

The applicant has indicated that during the site selection process, existing facilities in the immediate locality were analysed to determine whether any presented viable co-location options. As shown in Figure 7 below, there are two (2) nearby sites within the search area, specifically, the existing Telstra site proposed to be decommissioned and an existing rooftop site which would be a co-location option.

The applicant has advised that the co-location site at 388 Henley Beach Road has very little structural security on the rooftop and is unable to provide for an appropriate structural design. As a result of the investigations, the applicant has advised that no suitable co-location opportunities are available to provide for the required RF coverage objectives.



Figure 7: Location of nearby existing telecommunications facilities

In summary, the following candidate sites as depicted overleaf in Figure 8 in were investigated:

Candidate	Location	Proposal	Zoning	Description
A	388 Henley Beach Road, Lockleys, SA 5032	Co-Location rooftop	Residential Zone	Unable to structurally design
C1	2 May Terrace, Lockleys SA 5032	25m Greenfield Monopole	Community Zone	Land Owner not interest in location
C2	2 May Terrace, Lockleys SA 5032	25m Greenfield Monopole	Community Zone	Land Owner not interest in location
C3	2 May Terrace, Lockleys SA 5032	25m Greenfield Monopole	Community Zone	Preferred candidate
C4	2 May Terrace, Lockleys SA 5032	25m Greenfield Monopole	Community Zone	Coverage objectives not met



Figure 8: Location of proposed candidates

The applicant has undertaken sufficient investigations into alternate sites and co-location options within the locality to replace the existing telecommunications facility at 1 May Terrace, Brooklyn Park. Having identified no feasible co-location opportunities in the immediate locality, a location within a non-residential zone has been identified by the applicant that is unlikely to cause any adverse impacts to the existing land use.

The applicant has advised that Candidate C3 is considered to be the preferred option for the following reasons:

- The site will achieve the required coverage objectives for the area;
- The site will meet design and construction considerations; and
- The proposal operates within the regulatory frameworks of Commonwealth, State and Local Government jurisdictions.

The preferred candidate site selected (C3) will ensure that optimal service provision is delivered to the area and on this basis is considered to be appropriately sited on the subject land.

8.4 Electromagnetic Energy (EME) & Health

Genuine community concern exists around the establishment of telecommunications facilities and the impact of EME on public health.

The applicant has advised that the WHO and ARPANSA routinely review the medical research and science relevant to the EME generated by radio communications services.

The WHO advises that all expert reviews on the health effects of exposure to RF fields have concluded that no adverse health effects have been established from exposure to RF fields at levels below the international safety guidelines that have been adopted in Australia.

Furthermore, the maximum environmental EME level predicted from the proposed facility is within the allowable limit under the ARPANSA standard. The EME report indicates that the maximum EME level calculated at the location of the proposed facility is 2.23% out of 100% of the public exposure limit, when measured approximately 110.48m from the proposed location.

The applicant has clearly demonstrated that the proposed development and any associated infrastructure would comply with these guidelines, as detailed in the EME report contained in **Attachment 3**.

8.5 Heritage

The subject land does not have any local or state heritage items on site or in the immediate vicinity and as a result, there are no heritage implications associated with the proposed development.

8.6 Traffic Impact, Access and Parking

Access to the proposed site would be via a new proposed access gate and crossover via Henley Beach Road. In this regard, there is no requirement for special access to the site. Further information detailing this arrangement is contained in **Attachment 3**.

During the proposed construction phase various vehicles would require access to the site to deliver equipment and to construct the facility. Any traffic impacts associated with construction and establishment of the facility will be of a short-term duration (estimated to be approximately five (5) weeks over non-consecutive periods) and would not be expected to adversely impact on the surrounding road network.

The applicant has indicated that adequate parking would be available in the vicinity for vehicles used during construction and these movements would not impact upon local traffic. Should a road closure be required, the applicant will seek approval from DPTI.

The proposal was referred to the Transport Assessment and Policy Reform section of DPTI and indicated its general support for the proposal, subject to recommended conditions and advisory notes which are to be incorporated in any consent granted.

It is considered that the proposal will not impact on existing traffic and access arrangements on Henley Beach Road during construction or when operational.

8.7 Environmental Factors

8.7.1 Noise Emissions

In having regard to noise emissions affecting the subject land and locality, the only noise generated by the proposal beyond the construction works would be through the operation of air conditioning units located within the proposed equipment shelter. The applicant has advised that noise emanating from the air conditioning equipment is at a comparable level to a domestic air conditioning installation and will generally accord with the background noise levels prescribed by Australian Standard AS1055.

It is considered that the proposal is sufficiently setback from residential properties so that any noise related impacts are expected to be negligible.

8.7.2 Existing Vegetation

The applicant has advised that the development does not necessitate the removal of any substantial vegetation. It is expected that any required clearing would be limited to minor pruning and will not impact on the aforementioned flora or detrimentally impact the visual appearance of the site.

8.7.3 Waste Management

No additional waste is expected to be generated on site as a result of the development.

8.7.4 Energy Efficiency

The proposal is not envisaged to have unreasonable energy consumption.

9. CONCLUSION

The Development Plan envisages telecommunications facilities to be appropriately designed and sited to deliver communication services to the community. Whilst the proposed development is not specifically located within a Residential Zone, a key consideration is to balance the impact of the development on the nearby residential areas with the needs of the broader community who will benefit from the improved coverage.

It is considered that the applicant has sufficiently demonstrated a need for the facility and has undertaken an extensive site selection process in the immediate locality as envisaged by the Development Plan's General Section (Telecommunications Facilities) module.

In considering the suitability of the proposal in the context of the Community Zone, the applicant has demonstrated the proposed facility will not be likely to prejudice the continuance of the existing recreational use on the subject land or restrict future development opportunities on site.

In having regard to health impacts, the applicant has demonstrated that the predicted emission of EME levels from the operating monopole tower would be well within the allowable limit under the ARPANSA standards, and would not create any health impacts to residents within the immediate or wider locality based on WHO findings.

In regard to visual impact, it is acknowledged that the proposed facility will be visible from surrounding residential areas, however, it is considered that the monopole and shelter would be appropriately sited and screened by well-established vegetation to assist in minimising the visual impact on the locality and associated residential amenity.

Alternate sites for the facility were carefully considered by the applicant, with the chosen location selected as it is considered to achieve optimal network coverage whilst having no greater visual impact when compared to alternate sites investigated within the locality.

Referral agencies and Council are generally supportive of the location of the facility, site access and height of the structure.

On balance, it is considered that the proposed development is not seriously at variance with the relevant provisions of the West Torrens Council Development Plan and warrants Development Plan Consent, subject to conditions.

10. RECOMMENDATION

It is recommended that the State Commission Assessment Panel:

- 1) RESOLVE that the proposed development is NOT seriously at variance with the policies in the Development Plan.
- 2) RESOLVE that the State Commission Assessment Panel is satisfied that the proposal generally accords with the related Objectives and Principles of Development Control of the West Torrens Development Plan (consolidated 12 July 2018); and

- 3) RESOLVE to grant Development Plan Consent to the proposal by Telstra C-/Visionstream Pty Ltd for the construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2 metres and associated ancillary cabling and equipment located at 2 May Terrace, Lockleys, subject to the following conditions of consent.

PLANNING CONDITIONS

1. The development granted Development Plan Consent shall be undertaken and completed in accordance with the stamped plans and documentation, except where varied by conditions below (if any).
2. All utility or state agency-maintained infrastructure that is demolished, altered, removed or damaged during the construction of the development shall be reinstated to Council, utility or state-agency specifications. All costs associated with these works shall be met by the proponent.
3. If the approved development ceases operation, the monopole and associated infrastructure (including all equipment, fencing, shelter, footings etc) shall be removed from the site, with the land remediated and made suitable for recreational purposes.
4. The external finish of the telecommunications monopole, shelter and any equipment cabinets shall comprise natural, non-reflective, compatible colours to complement the natural environment and to minimise visual impact.
5. All vehicles shall enter and exit the site in a forward direction.
6. Stormwater run-off shall be collected on-site and discharged without jeopardising the safety and integrity of Henley Beach Road. Any alterations to the road drainage infrastructure required to facilitate this shall be at the applicant's expense.

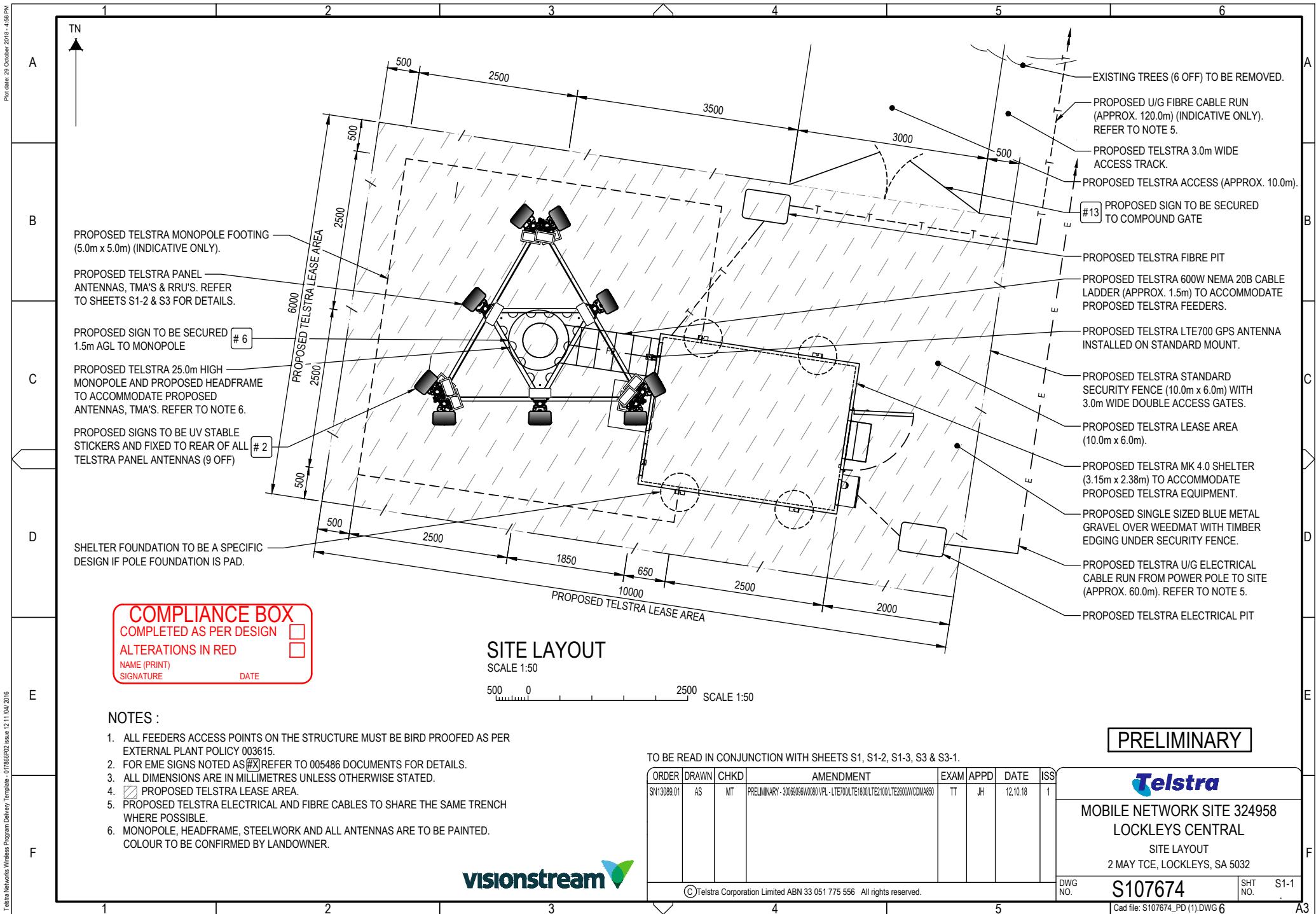
ADVISORY NOTES

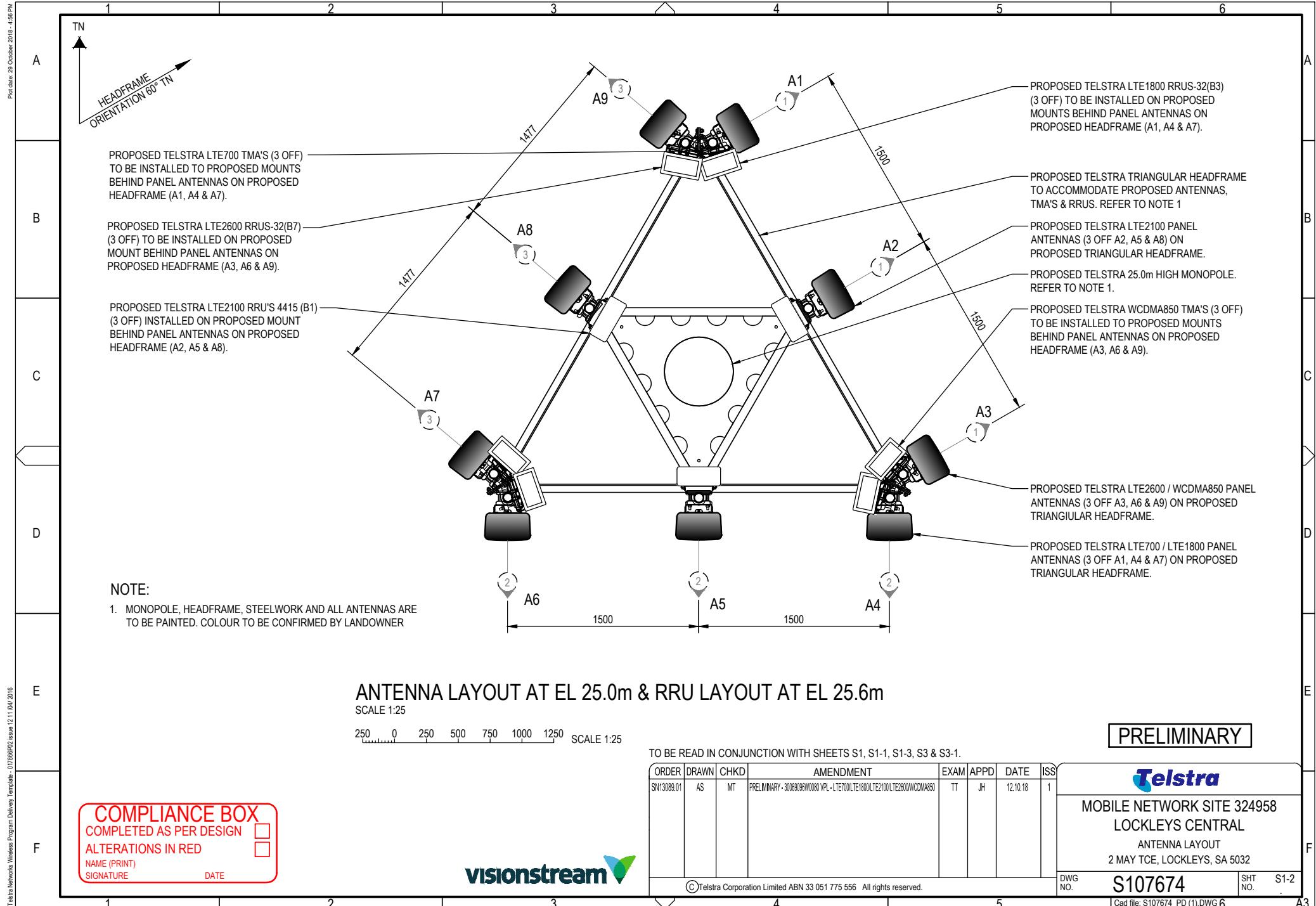
- a. This Development Plan Consent will expire after 12 months from the date of this Notification, unless final Development Approval from Council has been received within that period or this Consent has been extended by the State Commission Assessment Panel.
- b. The applicant is also advised that any act or work authorised or required by this Notification must be substantially commenced within 1 year of the final Development Approval issued by Council and substantially completed within 3 years of the date of final Development Approval issued by Council, unless that Development Approval is extended by the Council.
- c. The applicant has a right of appeal against the conditions which have been imposed on this Development Plan Consent. Such an appeal must be lodged at the Environment, Resources and Development Court within two months from the day of receiving this notice or such longer time as the Court may allow. The applicant is asked to contact the Court if wishing to appeal. The Court is located in the Sir Samuel Way Building, Victoria Square, Adelaide (telephone number 8204 0289).
- d. Should traffic flows on Henley Beach Road be expected to be impacted during construction, the applicant must contact DPTI's Traffic Management Centre on telephone 1800 013 313 to obtain the necessary permit for works on/or adjacent to the arterial road. A Traffic Management Plan may be required in order to safely manage traffic flows along this section of the road.

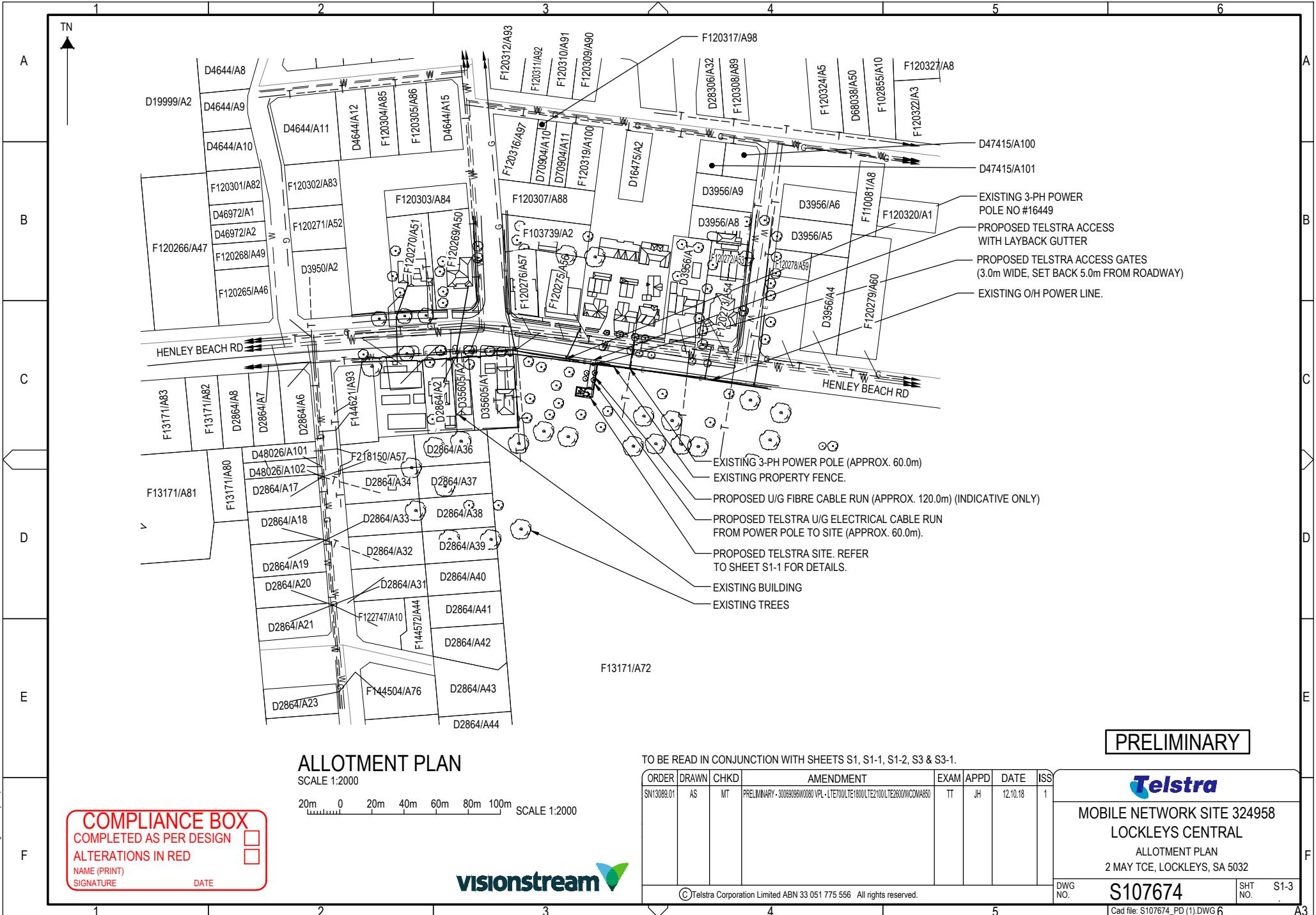
- e. The monopole at a height of RL32.2m Australian Height Datum (AHD) as described does not penetrate the Adelaide Airport Obstacle Limitation Surface (OLS) airspace protected for aircraft operations. Any further proposed addition to the structure, including aerials, masts and vent/exhaust stacks, must be subject to a separate assessment.
- f. Crane operations associated with construction shall be the subject of separate application. Adelaide Airport Limited requires 48 days prior notice of any crane operations during the construction. Crane assessment may also have to be conducted by the Civil Aviation Safety Authority (CASA).
- g. Restrictions may apply to lighting illumination. Any lighting proposed shall conform to airport lighting restrictions and shall be shielded from aircraft flight paths.

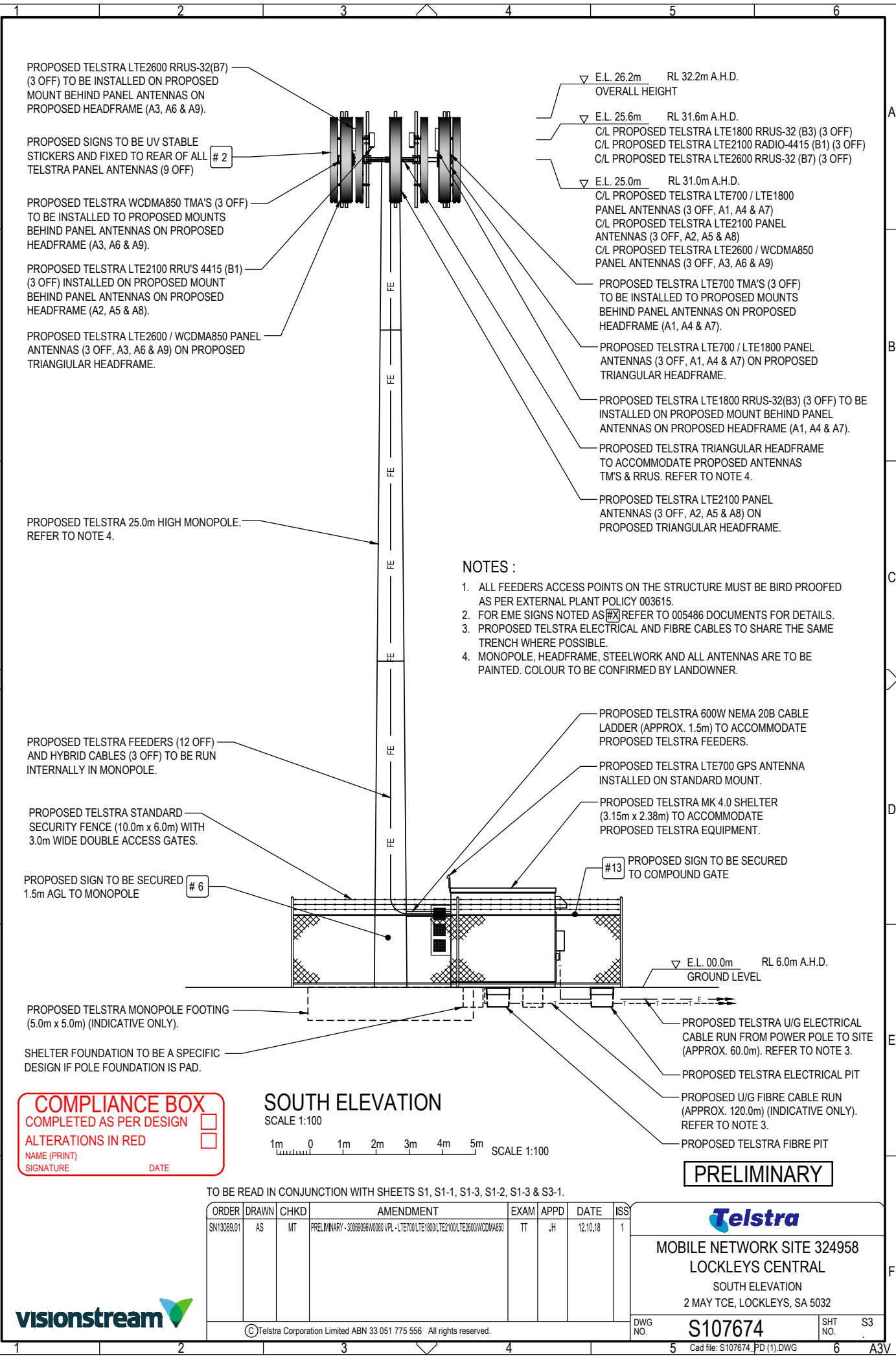


BEN WILLIAMS
PLANNING OFFICER
PLANNING AND LAND USE SERVICES
DEPARTMENT OF PLANNING, TRANSPORT and INFRASTRUCTURE









1 2 3 4 5 6

TELSTRA ANTENNA CONFIGURATION TABLE

ANTENNA No	ANTENNA TYPE & SIZE H x W x D	ANTENNA ACTION REQUIRED	ANTENNA HEIGHT C/L A.G.L.	ANTENNA BEARING (x°T)	SECTOR NO. & TECHNOLOGY
A1	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	60°	S1: LTE700 S1: LTE700 S1: LTE1800 S1: LTE1800 S1: LTE1800 S1: LTE1800
A2	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	60°	SPARE SPARE S1: LTE2100 S1: LTE2100 S1: LTE2100 S1: LTE2100
A3	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	60°	S1: WCDMA850 S1: WCDMA850 S1: LTE2600 S1: LTE2600 S1: LTE2600 S1: LTE2600
A4	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	180°	S2: LTE700 S2: LTE700 S2: LTE1800 S2: LTE1800 S2: LTE1800 S2: LTE1800
A5	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	180°	SPARE SPARE S2: LTE2100 S2: LTE2100 S2: LTE2100 S2: LTE2100
A6	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	180°	S2: WCDMA850 S2: WCDMA850 S2: LTE2600 S2: LTE2600 S2: LTE2600 S2: LTE2600
A7	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	310°	S3: LTE700 S3: LTE700 S3: LTE1800 S3: LTE1800 S3: LTE1800 S3: LTE1800
A8	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	310°	SPARE SPARE S3:LTE2100 S3:LTE2100 S3:LTE2100 S3:LTE2100
A9	ARGUS RVVPX310.11B-T2 PANEL 2533 x 350 x 208mm	INSTALL	25.0m	310°	S3: WCDMA850 S3: WCDMA850 S3: LTE2600 S3: LTE2600 S3: LTE2600 S3: LTE2600
A200	GPS ANTENNA KRE 101 2082/1 Ø68 x 96	INSTALL	BASE OF GPS 3.0m	0°	-

COMPLIANCE BOX
COMPLETED AS PER DESIGN ALTERATIONS IN RED

NAME (PRINT)

SIGNATURE

DATE

PRELIMINARY

TO BE READ IN CONJUNCTION WITH SHEETS S1, S1-1, S1-2, S1-3 & S3.

ORDER	DRAWN	CHKD	AMENDMENT	EXAM	APPD	DATE	ISS
SN13089.01	AS	MT	PRELIMINARY-30069095W0080VPL-LTE700 LTE1800 LTE2100 LTE2600 WCDMA850	TT	JH	12.10.18	1

Telstra

MOBILE NETWORK SITE 324958
LOCKLEYS CENTRAL
ANTENNA CONFIGURATION TABLE
2 MAY TCE, LOCKLEYS, SA 5032

DWG NO.	S107674	SHT NO.	S3-1
---------	---------	---------	------

visionstream

1 2 3 4 5 6 A3V

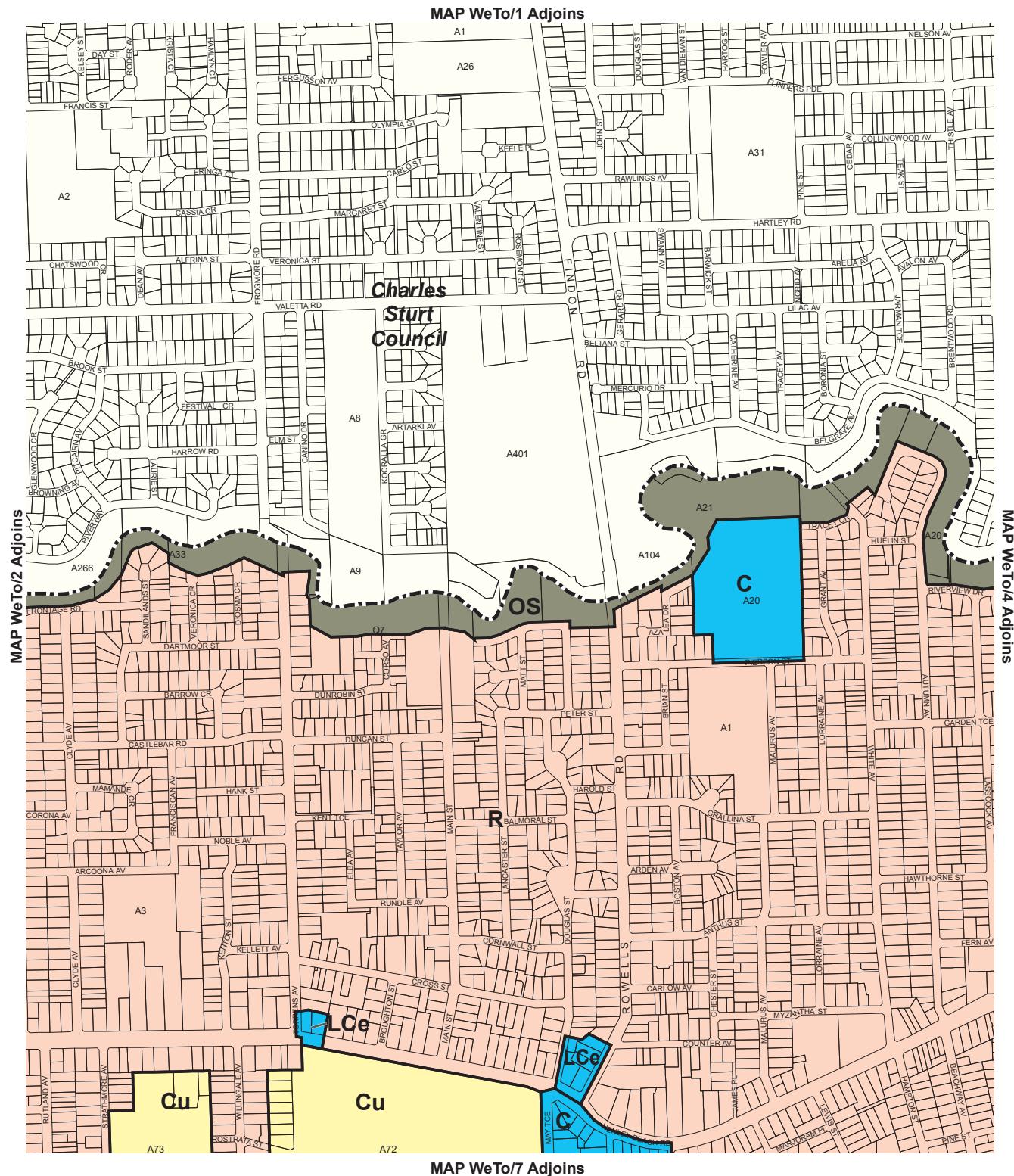
Site Photography



View looking east (Henley Beach Road) - towards proposed site



View of established vegetation on site



Lamberts Conformal Conic Projection, GDA94

0 500m

Zones

C Commercial

Cu Community

LCe Local Centre

OS Open Space

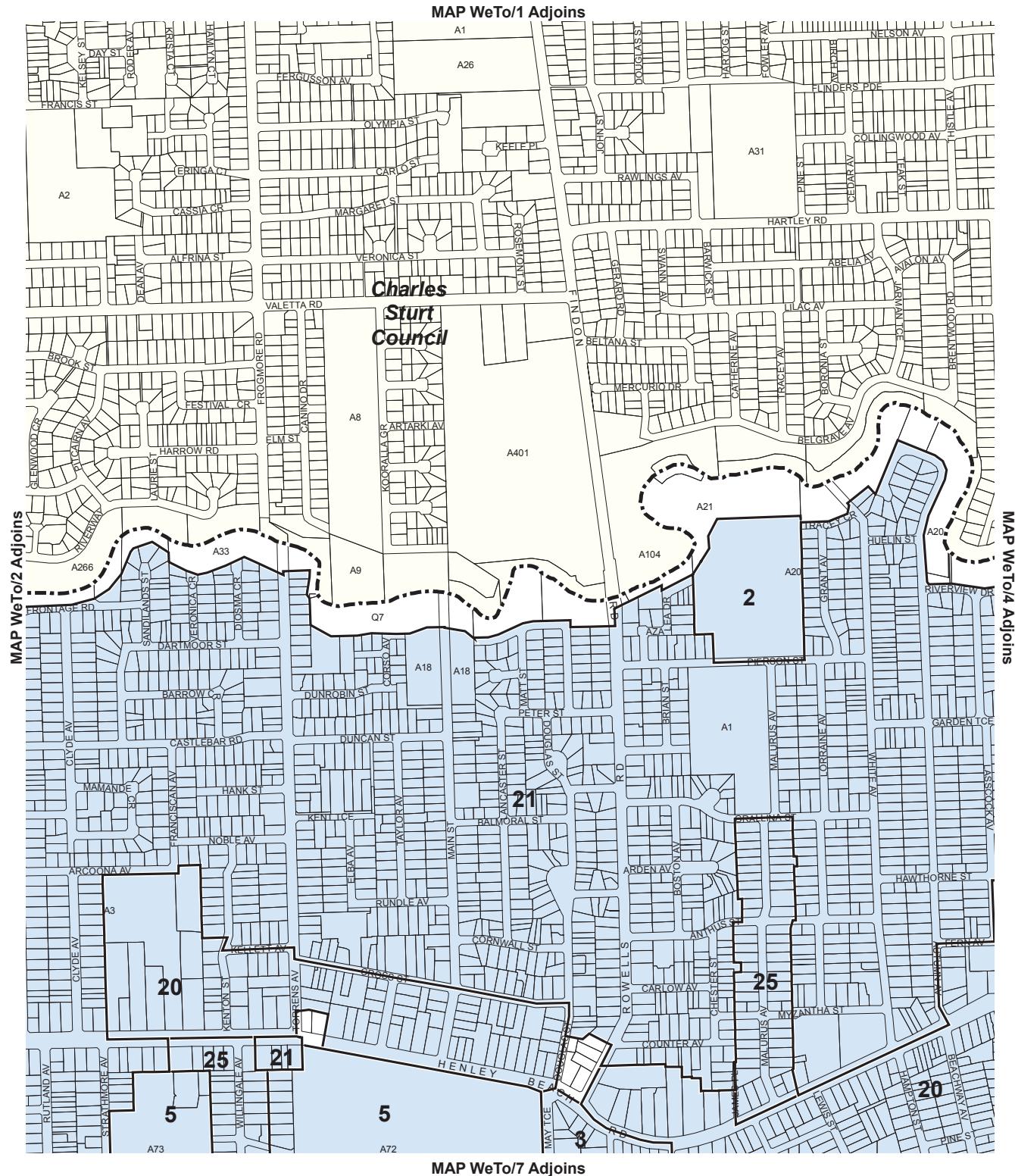
R Residential

Zone Boundary

Development Plan Boundary

Zone Map WeTo/3

WEST TORRENS COUNCIL
Consolidated - 12 July 2018



Lamberts Conformal Conic Projection, GDA94

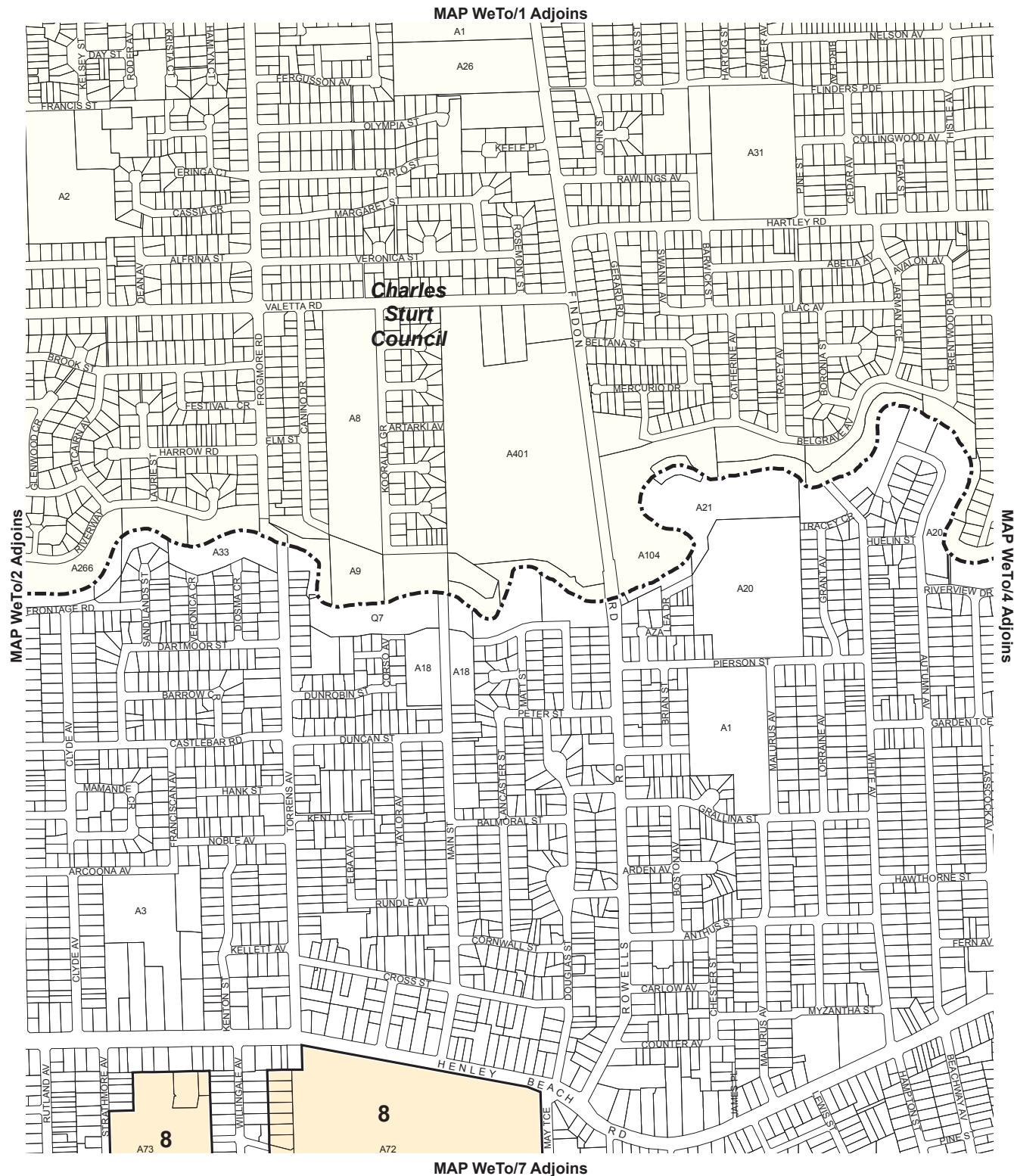
- Policy Area**
- 2 District Commercial
 - 20 Low Density
 - 21 Low Density
 - 25 Lockleys Character
 - 3 Local Commercial
 - 5 Recreation

0 500m



Policy Area Map WeTo/3

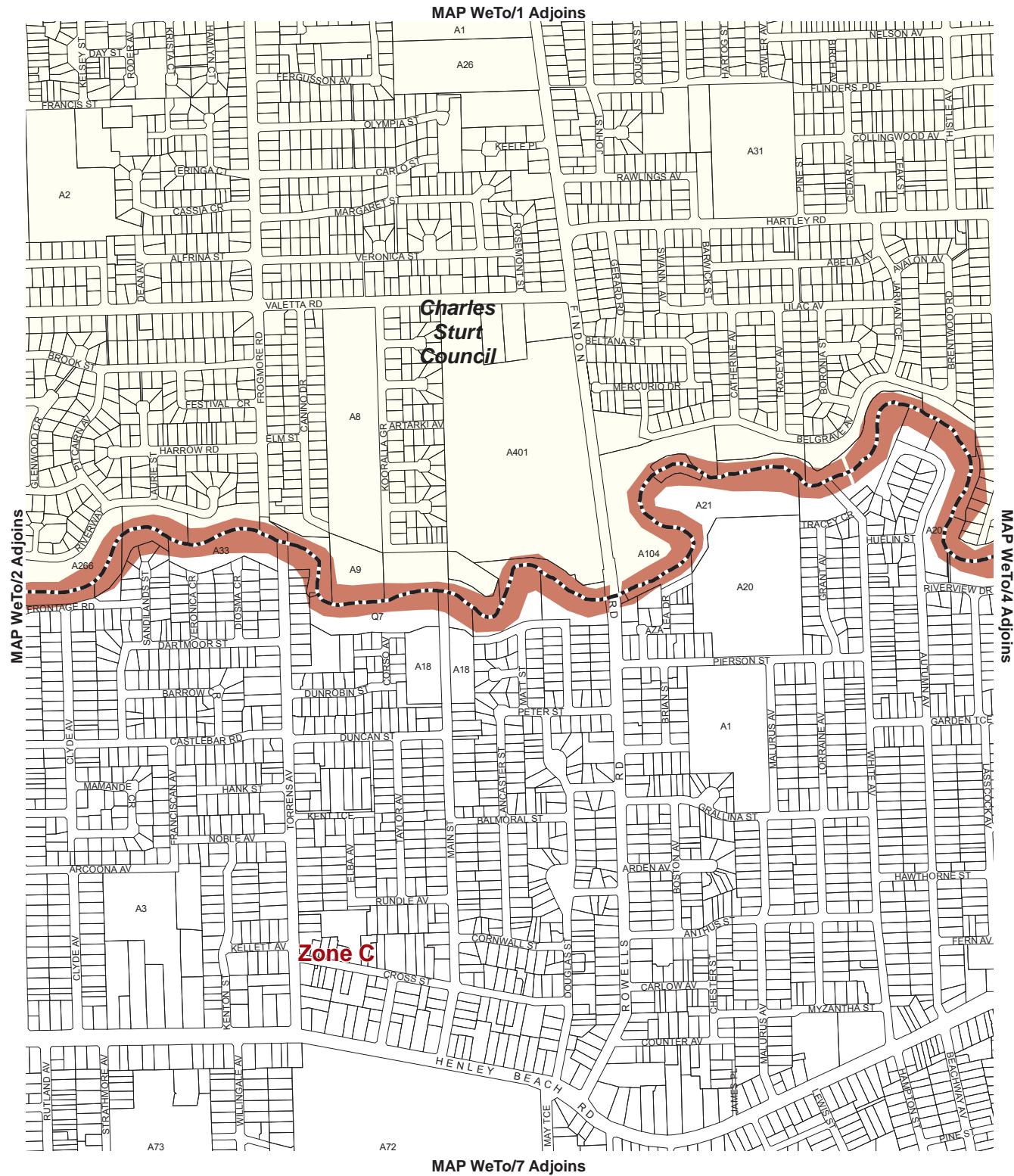
Policy Area Boundary
 Development Plan Boundary



Precinct Map WeTo/3

Precinct Boundary
--- Development Plan Boundary

WEST TORRENS COUNCIL
Consolidated - 12 July 2018



Airport Building Heights

Zone C All Structures Exceeding 15 metres above existing ground level

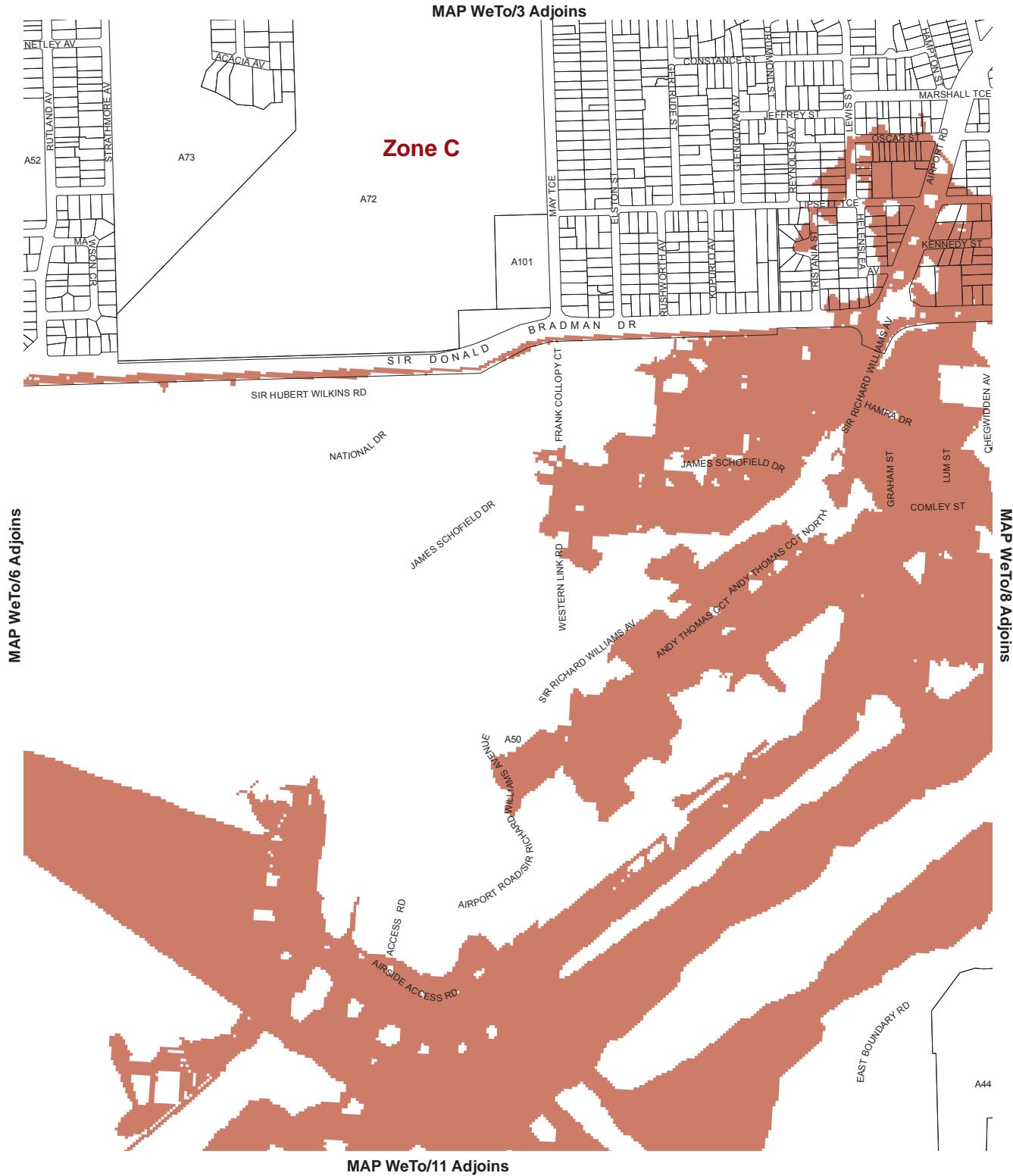
0 500m



Overlay Map WeTo/3 DEVELOPMENT CONSTRAINTS

- Airport Building Heights
- Flood Hazard
- Development Plan Boundary

WEST TORRENS COUNCIL
Consolidated - 12 July 2018



Airport Building Heights

Zone C All Structures Exceeding 15 metres above existing ground level

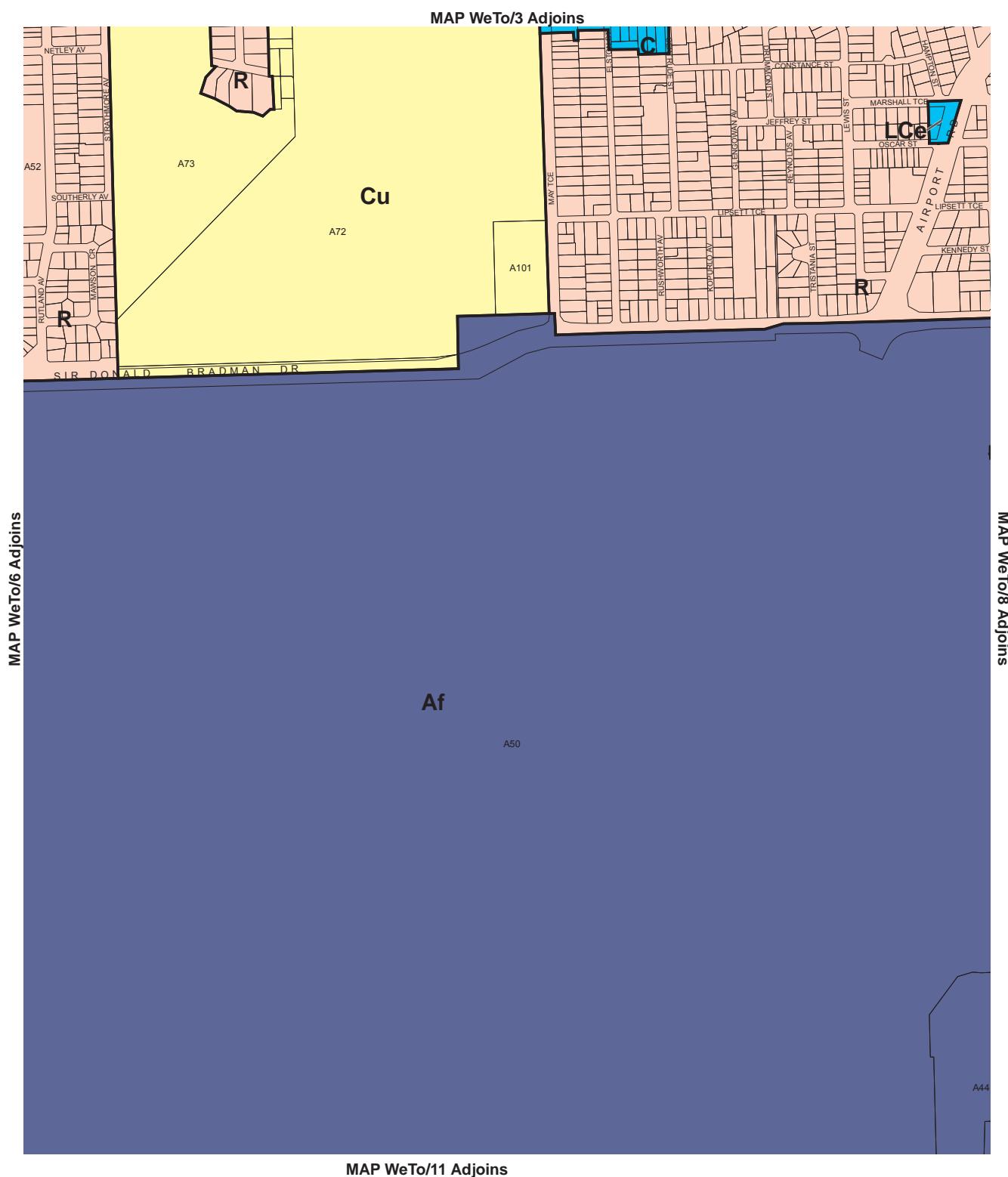
0 500m



Overlay Map WeTo/7 DEVELOPMENT CONSTRAINTS

Airport Building Heights
 Flood Hazard

WEST TORRENS COUNCIL
Consolidated - 12 July 2018



Lamberts Conformal Conic Projection, GDA94

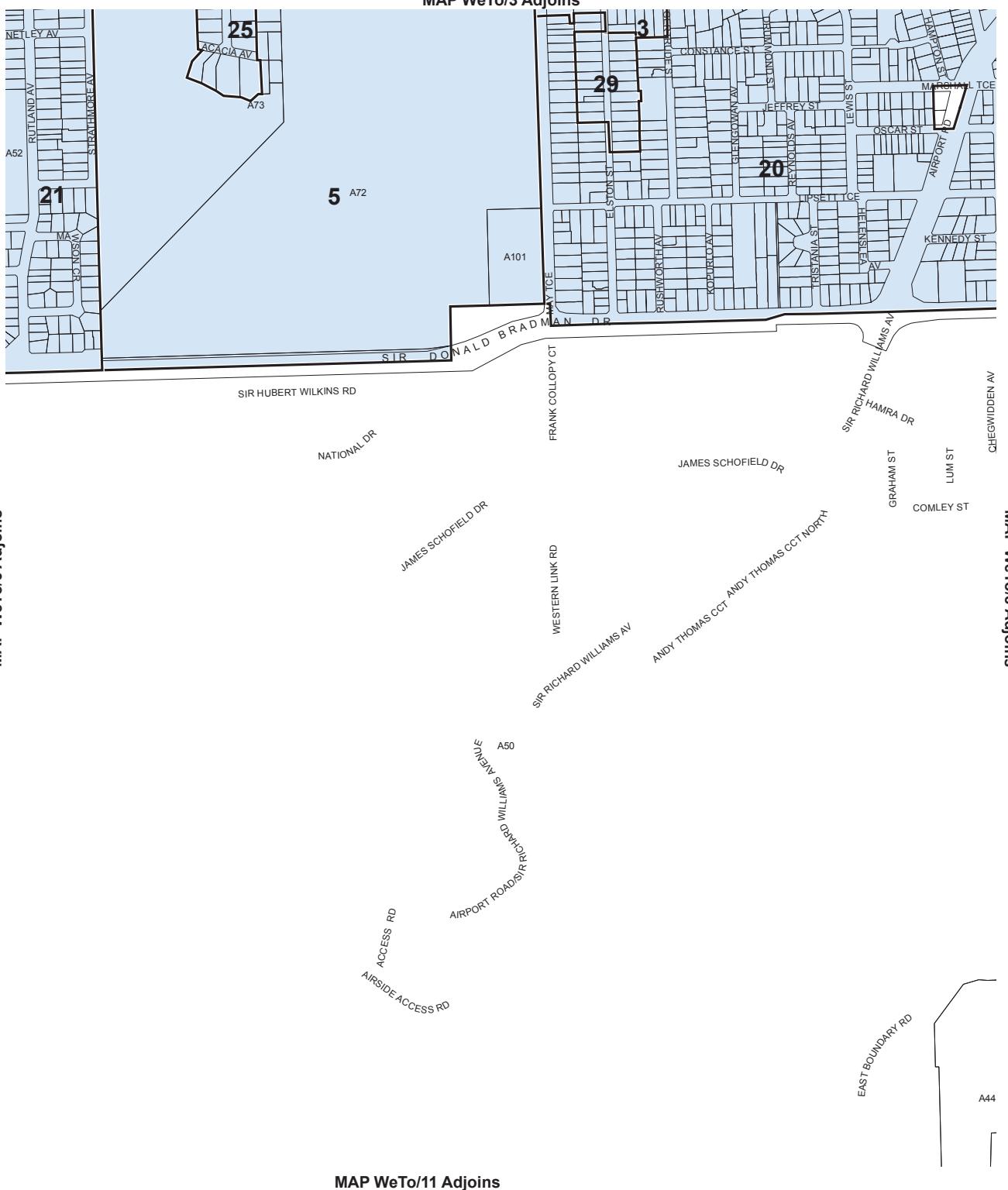


Zones

	Airfield
	Commercial
	Community
	Local Centre
	Residential
	Zone Boundary

Zone Map WeTo/7

MAP WeTo/6 Adjoins

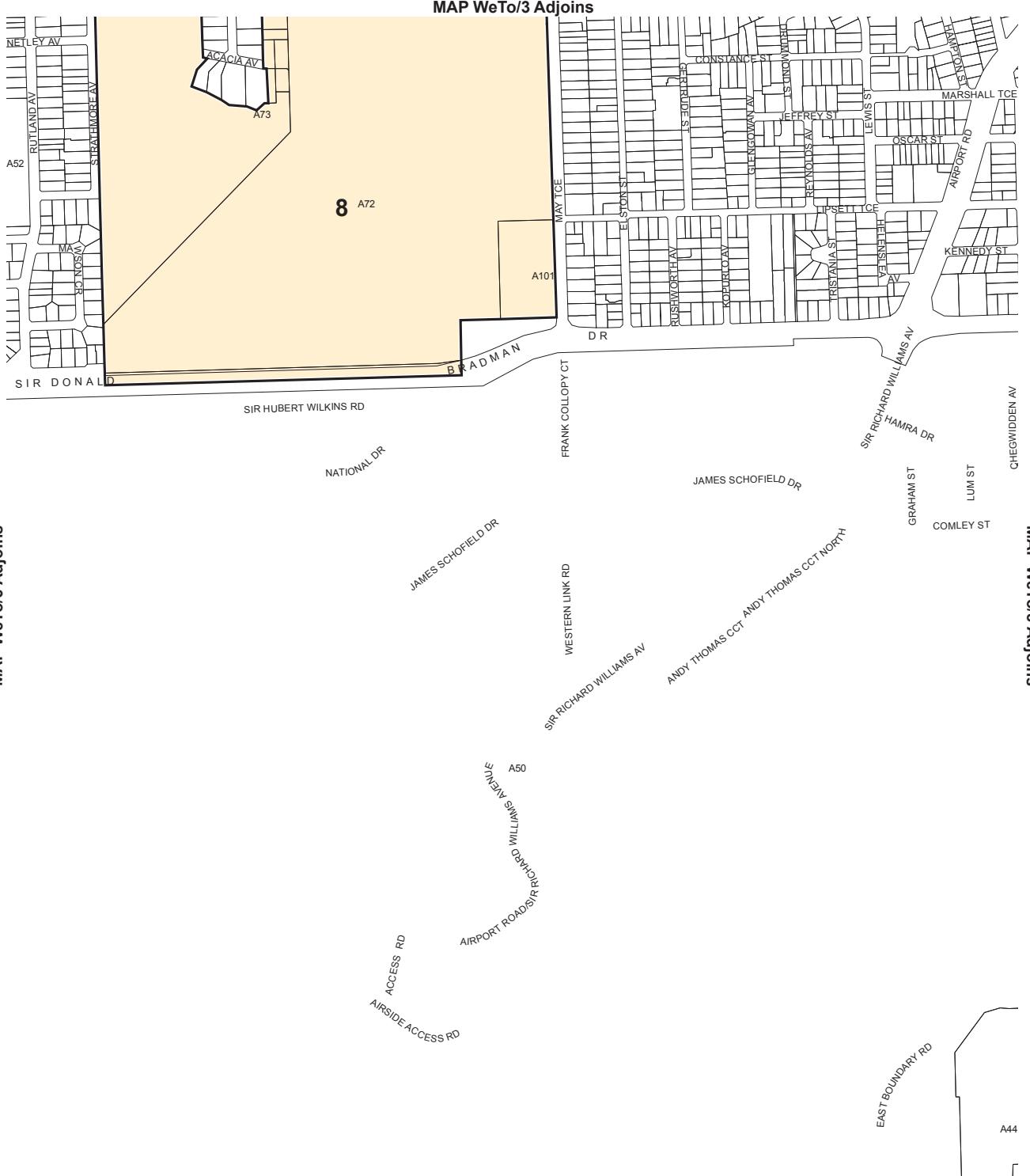


Policy Area Map WeTo/7

Policy Area Boundary

WEST TORRENS COUNCIL
Consolidated - 12 July 2018

MAP WeTo/6 Adjoins



MAP WeTo/11 Adjoins

Lamberts Conformal Conic Projection, GDA94

Precinct

8 Open Space

0 500 m



Precinct Map WeTo/7

Precinct Boundary

WEST TORRENS COUNCIL
Consolidated - 12 July 2018

Development Application form

Civic Centre: 165 Sir Donald Bradman Drive, Hilton SA 5033. Office hours: Mon - Fri 8.30am - 5pm.
Phone: (08) 8416 6333. Email: development@wtcc.sa.gov.au. Web: westtorrens.sa.gov.au.



Section 1- correspondence method

By selecting '**I ACCEPT**' below, you agree (as the applicant, the owner and/or the authorised agent) to be legally bound by the 'Terms and conditions' of this service and you consent that all correspondence relevant to this application, or which is otherwise required to be provided to you under the *Development Act 1993* - including Decision Notification forms, stamped plans and relevant documents, be provided to you in **electronic format** only. Please tick ONLY one of the following boxes.

I ACCEPT

or, if you do not wish to correspond electronically, three complete sets of hardcopy documents will be required

I choose only to receive general assessment correspondence via email. All stamped plans and Decision Notification forms must be sent by hardcopy mail.

Email address:

Section 2 - consent sought

Select **one** type of consent you wish to apply for:

Development Plan consent
(Planning only)

Building Rules consent
(Building only)

Development Approval
(Planning and building)

If unsure what type of consent is needed, contact Council on 8416 6333.

Section 3 - location of proposed development

2	72	13171	5323	509
House number	OR	Lot number	DP	CT volume
				Folio

May Terrace	Lockleys
-------------	----------

Street name Suburb

SA	5032
----	------

State Post code

Section 4 - applicant details

Please note that all correspondence will be sent to the applicant (this section must be completed).

Visionstream (On Behalf of Telstra)		
-------------------------------------	--	--

Given names Surname Phone

72 Kinkaid Avenue	North Plympton
-------------------	----------------

Postal address Suburb

SA	5037	
----	------	--

State Post code Email

Section 5 - owner's details of the subject land

If same as applicant details, please leave blank and go to section 6.

The Kooyonga Golf Club INC		08 8352 5444
----------------------------	--	--------------

Given names Surname Phone

2 May Terrace,	Lockleys
----------------	----------

Postal address Suburb

SA	5032	
----	------	--

State Post code Email

Section 6 - contact for further information

Please note - this section is to be completed if the contact person is not the applicant.

Stefan	Kaldis
--------	--------

Given names

Surname

Stefan.Kaldis@visionstream.com.au

08 8406 0982

Email

Phone

Section 7 - builder's details

This section must be completed by the applicant for Building and Development approval.

Owner builder OR Builder

TBC	
-----	--

Name of builder (company)

Licence number

--	--

Postal address

Suburb

--	--	--

State

Post code

Email

Section 8 - description of development and associated details

Please describe the development (eg single storey detached dwelling, domestic garage, warehouse with office, tree removal).

Telecommunications Facility

Existing site use: Community/ recreational open space

Does the proposal affect a regulated or significant tree?

Yes No

Note: a regulated or significant tree may be on the adjoining land that may be affected (including damage to tree roots) by the proposed development. If unsure what a regulated or significant tree is, visit Council's website for more information.

Is there a brush fence within three metres of the proposed building work? Yes No

Are there any easements on the land? Yes No

Section 9 - costing and floor area

Council may require written justification to verify costs (this section must be completed).

\$200, 000	m ²
------------	----------------

Estimated total cost of works (excluding fitout)

Estimated floor area of work

Section 10 - building classification

If unsure, contact Council on 8416 6333 or visit the Council office during business hours.

--	--

Current classification

Classification sought

If Class 5, 6, 7, 8, or 9, state number of employees: Male Female

Section 11 - declaration

Council is required by the *Development Act 1993* to make Category 2 and 3 Developments available for public inspection and the public may obtain copies of this material for a fee. If you have concerns over the confidentiality or security content of such documents, you should discuss these with a member of Council's planning staff before lodging.

I declare that the information I have provided on this application form is correct to the best of my knowledge and give permission to make this information available for public inspection.

Signature Date: 30/10/18

Applicant Owner Authorised agent

Powerline Clearance Declaration form

Development Regulations 2008



Civic Centre: 165 Sir Donald Bradman Drive, Hilton SA 5033. Office hours: Mon - Fri 8.30am - 5pm.
Phone: (08) 8416 6333. Email: development@wtcc.sa.gov.au. Web: westtorrens.sa.gov.au

Date of Application: 30 / 10 /2018

Applicant:	Given Name: Visionstream (on Behalf of Telstra)		Family Name:
Address:	Lot No: 72	House No: 2	Street: May Terrace
	Suburb: Lockleys		
Volume: 5323	Folio: 509		

Nature of proposed development: Telecommunications Facility

I Stefan Kaldis being the applicant / a person acting on behalf of the applicant (delete the inapplicable statement) for the development described above declare that the proposed development will involve the construction of a building which would, if constructed in accordance with the plans submitted, not be contrary to the regulations prescribed for the purposes of section 86 of the *Electricity Act 1996*. I make this declaration under clause 2A(1) of Schedule 5 of the *Development Regulations 2008*.

Date: 30 / 10 / 18

Signature: SK



Product	Title Details
Date/Time	20/04/2018 02:34PM
Customer Reference	Brkln Park West Relo
Order ID	20180420008683
Cost	\$21.20

Certificate of Title

Title Reference CT 5323/509
Status CURRENT
Easement YES
Owner Number 80190800
Address for Notices PO BOX 119 BROOKLYN PARK 5032
Area NOT AVAILABLE

Estate Type

Fee Simple

Registered Proprietor

THE KOONYONGA GOLF CLUB INC.
OF LOCKLEYS SA 5032

Description of Land

ALLOTMENT 72 FILED PLAN 13171
IN THE AREA NAMED LOCKLEYS
HUNDRED OF ADELAIDE

Last Sale Details

There are no sales details recorded for this property

Constraints

Encumbrances

Dealing Type	Dealing Number	Beneficiary
MORTGAGE	2709876	NATIONAL AUSTRALIA BANK LTD.

Stoppers

NIL

Conditions

DECLARED OPEN SPACE VIDE PROCLAMATION IN GOVERNMENT GAZETTE DATED 31.10.1957 PAGE 1008

Valuation Numbers

Valuation Number	Status	Property Location Address
2122433057	CURRENT	2 MAY TERRACE, LOCKLEYS, SA 5032

Notations

Dealings Affecting Title

NIL



Product	Title Details
Date/Time	20/04/2018 02:34PM
Customer Reference	Brkln Park West Relo
Order ID	20180420008683
Cost	\$21.20

Notations on Plan

NIL

Registrar-General's Notes

SUBJECT TO OPEN SPACE PROCLAIMED VIDE GAZETTE DATED 31/10/1957
AMENDMENT TO DIAGRAM VIDE 2/2001

Administrative Interests

NIL

FILED PLAN NUMBER

FP 13171

ACCEPTED FOR FILING

J. Baker

Pro Registrar-General
4 / 8 / 1981

Reference Map No. 6628-41-j & k

COUNCIL

CITY OF WEST TORRENS

NARRATIVE FILE R.T. 4759846

THIS IS SHEET 1 OF 2 SHEETS

~~AMENDMENT TO ALLOTMENT IDENTIFIER
VIDE DKT. 207 / 2000~~
~~PRO R.G. 15 / 9 / 2000~~

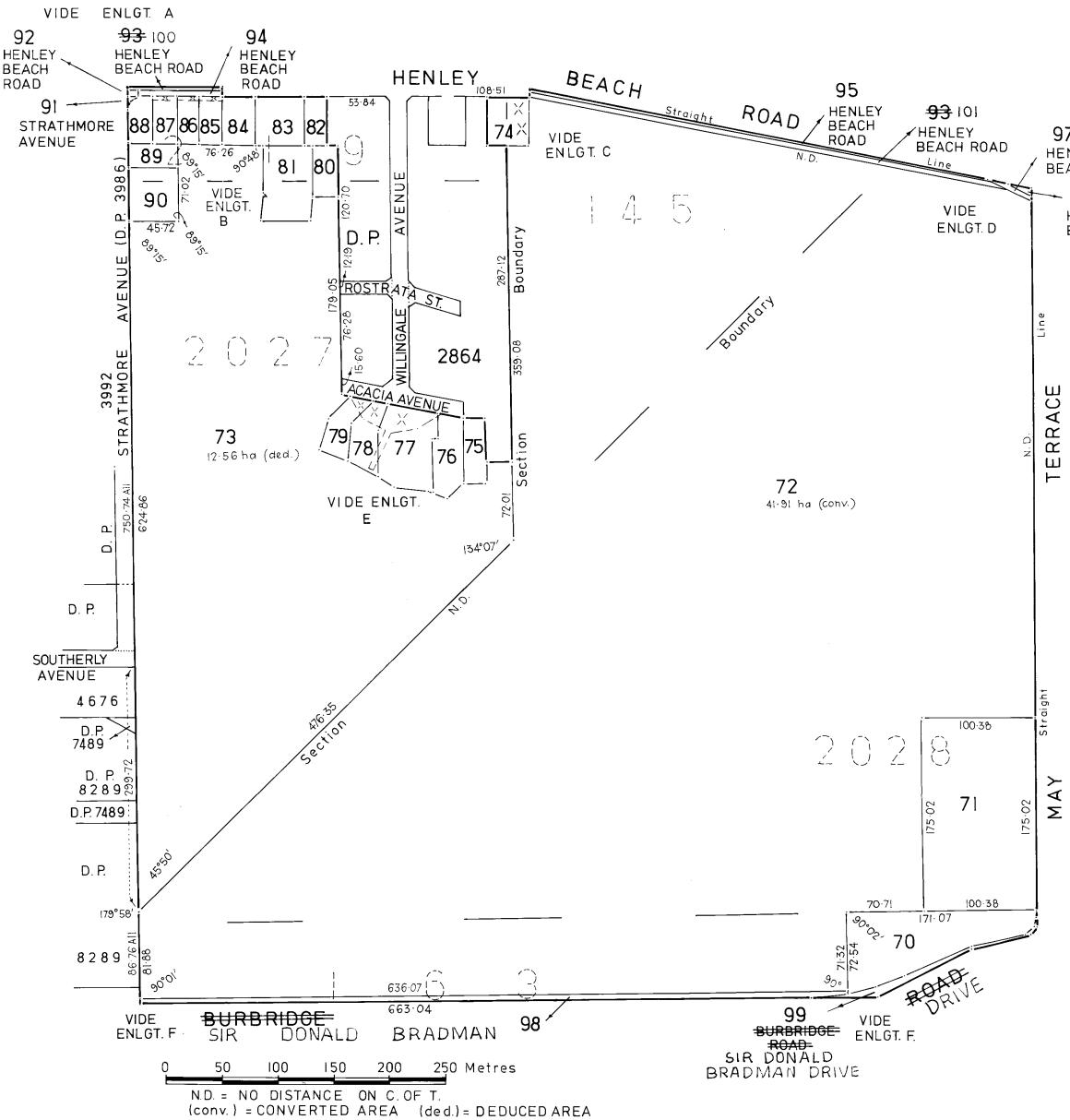
SIR DONALD BRADMAN DRIVE VIDE DKT
2/2001 APR 06 3/1/2000

COMPILED PLAN

PORTION OF SECTIONS 145, 163, 219, 2027, AND 2028
ALLOTMENTS 1, 9, 10, 11, 12, 13, 14, 48, 49, 50, 51, 52 AND 53 IN D.P. 2864
5 IN F.P. 2029 AND PORTION OF ALLOTMENT 4 IN D.P. 4312

CLOSED ROADS B AND C IN R.P. 1375, A AND B IN R.P. 1845,
C IN R.P. 7772 D AND PORTION OF B IN R.P. 2677

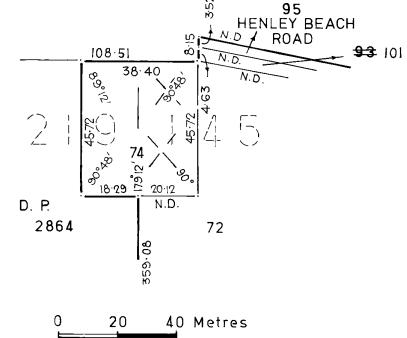
OF PORTION OF SECTIONS 145, 163, 219, 2027, 2028 AND CLOSED ROADS
HUNDRED OF ADELAIDE IN THE AREA NAMED LOCKLEYS



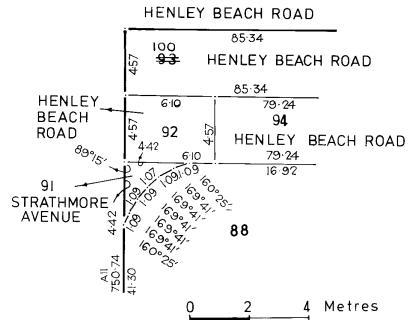
THIS PLAN WAS DRAWN IN THE
REGISTRAR GENERAL'S OFFICE
DEPARTMENT OF LANDS

FILED PLAN NUMBER
FP 13171
ACCEPTED FOR FILING
J. Jones,
Pro Registrar-General
4 / 8 / 1981
Reference Map No. 6628-41-j & k
COUNCIL
CITY OF WEST TORRENS
NARRATIVE FILE R.T. 4759846
THIS IS SHEET 2 OF 2 SHEETS

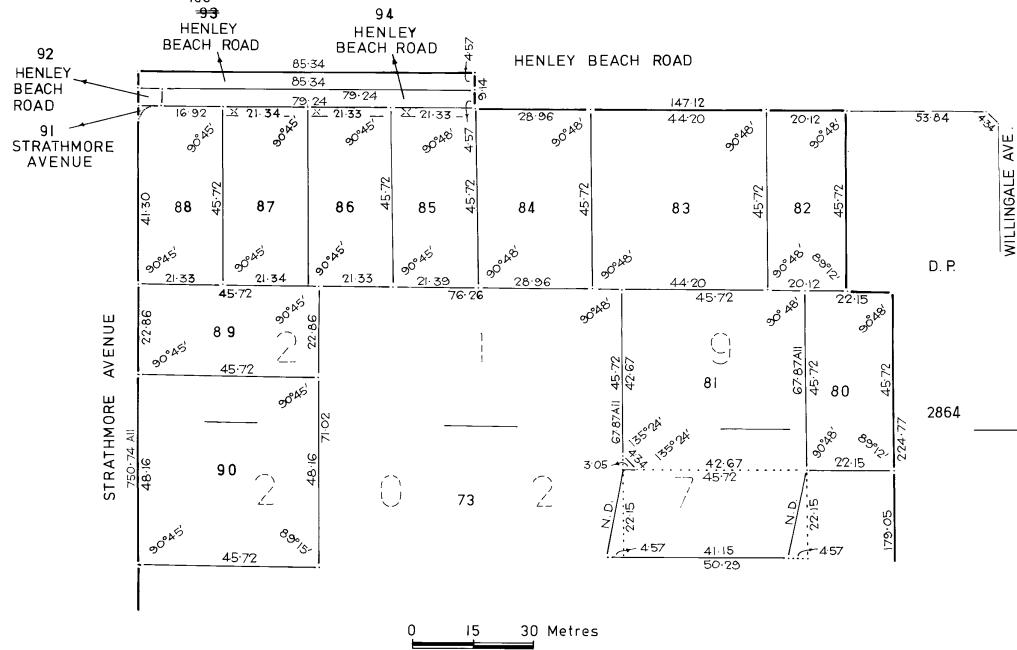
ENLARGEMENT C



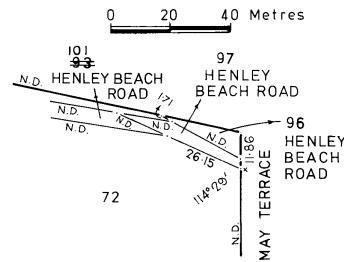
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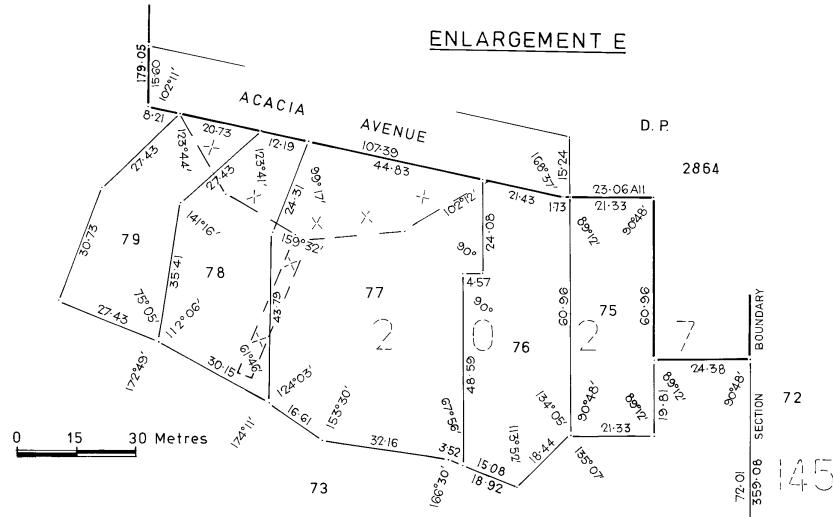
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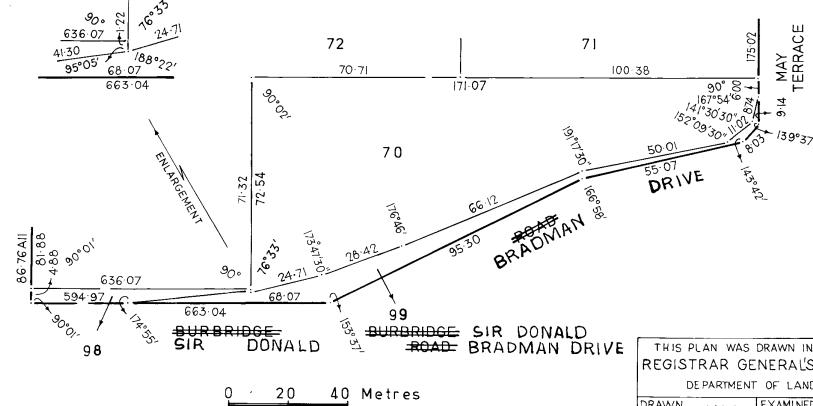
ENLARGEMENT D



ENLARGEMENT E



ENLARGEMENT F



THIS PLAN WAS DRAWN IN THE
REGISTRAR GENERAL'S OFFICE
DEPARTMENT OF LANDS
DRAWN J.M.J. EXAMINED A.B.B.

PLANNING ASSESSMENT REPORT

Development Application for

The installation of a Telecommunications Facility at

2 May Terrace, Lockleys SA 5032

(Lot 72 on Filed Plan 13171)

Document prepared by **Visionstream Pty Ltd**

On behalf of **Telstra Corporation Ltd**

Project Name: Lockleys Central Relocate Brooklyn Park West

Project No.: SN13089.02

October 2018



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Document Control

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1.0 Executive Summary

1.1 Site and Proposal Details

Address of Site	2 May Terrace, Lockleys SA 5032
Legal Property Description	Lot 72 on Filed Plan 13171
Local Authority	West Torrens
Planning Instrument	West Torrens Development Plan, consolidated 12 July 2018
Zone and Overlay	Community Zone
Use	Telecommunications Facility
Owner	The Kooyonga Golf Club Inc.

1.2 Applicant Details

Applicant	Telstra Corporation Limited ABN 051 775 556 C/- Visionstream Pty Ltd	
Contact Person	Stefan Kaldis	(08) 8406 0982 Stefan.Kaldis@Visionstream.com.au
Our Reference	SN13089.02 Lockleys Central Relocate Brooklyn Park West	

2.0 Introduction

This report has been prepared by Visionstream on behalf of Telstra as supporting information to a Development Application for the installation of a 25.0 metre high telecommunications facility at 2 May Terrace, Lockleys SA 5032 which is more formally known as Lot 72 on Filed Plan 13171.

Refer to Appendix 1 for Title details

All mobile phone network operators are bound by the operational provisions of the federal *Telecommunications Act 1997* ("The Act") and the *Telecommunications Code of Practice 1997*. The *Telecommunications (Low-Impact Facilities) Determination 1997* allows for the upgrade of existing mobile phone network infrastructure without the consent of a relevant statutory authority.

In this instance the proposed development does not comply as a "Low Impact facility" under the definitions contained in the Commonwealth legislation. Therefore it is subject to the provisions of the South Australian *Development Act, 1993* and the provisions of West Torrens Development Plan, consolidated 12 July 2018.

3.0 Proposed Scope of Works

The proposal is inclusive of the following scope of works:

- Install one (1) 25m Monopole, with an overall height no greater than 26.2m
- Installation of a triangular headframe;
- Install nine (9) new panel antennas (no greater than 2.8m in length);
- Installation of one (1) Telstra Equipment Shelter, that is not more than 3m high with a base area of not more than 7.5m² at the base of the aforementioned monopole;
- Installation of associated ancillary cabling and equipment;
- Install a new 2.4m high chain-link mesh fence (dimensions 6m x 10m) surrounding the Telstra compound, with a 3m wide access gate;

Refer to Plans attached in Appendix B for further details.

4.0 Purpose of the Proposal

The purpose of the application is to receive development plan consent for the installation of a telecommunications facility at 2 May Terrace, Lockleys SA 5032 on behalf of Telstra to provide mobile telecommunications capacity to the residential area of Lockleys. This site is to replace/relocate the existing Telstra facility located at 1 May Terrace, which will be decommissioned when the proposed site is active.

5.0 Mobile Telecommunications Networks

A mobile telecommunications network is made up of multiple base stations covering a geographic area. They work by sending and receiving radio signals from their antennas to mobile phones and other mobile devices such as tablets, wireless dongles etc. Base stations are designed to provide service to the area immediately surrounding their location, which can measure up to several kilometres. Depending on the technical objectives of a base station, the physical characteristics of each telecommunications facility; such as its height, number and size of antennas, equipment, cabling etc., will vary.

As a general rule, the higher the antennas at a base station are, the greater its range of coverage and its ability to relieve capacity issues. If this height is compromised then additional facilities, and thus more infrastructure, will be required for any given locality. The further a facility is located away from its technically optimum position, the greater the compromise of service. This may result in coverage gaps and require additional or taller base stations to provide adequate service.

Each base station transmits and receives signals to and from mobile devices in the area. As the mobile device users moves around their devices will communicate with the nearest mobile base station facility at all times. If they cannot pick up a signal, or the nearest base station is congested then the users may not be able to place a call, they may experience a call "drop out" or a slowing of their data rate while attempting to download content.

The current proposal will form part of Telstra's NextG network solution to lockleys and surrounding areas and will deliver essential mobile services (voice calling, SMS), as well as live video calling, video-based content including; news, finance and sports highlights, and high-speed wireless internet. With a coverage footprint of more than 2.1 million square kilometres and covering more than 99% of the Australian population, Telstra's NextG Network is Australia's largest and fastest national mobile broadband network and, therefore, requires more network facilities located closer together to ensure a high quality signal strength in order to achieve reliable service and the fastest possible data transfer rates.

6.0 Site Parameters

Telstra commences the site selection process with a search of potential sites that meet the network's technical requirements, with a view to also having the least possible impact on the amenity of the surrounding area. Telstra applies and evaluates a range of criteria as part of this site selection process.

Telstra assesses the technical viability of potential sites through the use of computer modelling tools that produce predictions of the coverage that may be expected from these sites, as well as from the experience and knowledge of the radio engineers.

There are also a number of other important criteria that Telstra uses to assess options and select sites that may be suitable for a proposed new facility. These take into account factors other than the technical performance of the site and include:

- The potential to co-locate on an existing telecommunications facility.
- The potential to locate on an existing building or structure.
- Visual impact and the potential to obtain relevant town planning approvals.
- Proximity to community sensitive locations and areas of environmental heritage.
- The potential to obtain tenure at the site.
- The cost of developing the site and the provision of utilities (power, access to the facility and transmission links).

In making the proposal for this site at 2 May Terrace, Lockleys, Telstra has carefully weighed all of the aforementioned criteria. This analysis is detailed in the next section.

7.0 Candidate Sites

Telstra carefully examined a range of possible deployment options in the area before concluding that a new telecommunications facility at 2 May Terrace, Lockleys would be the most appropriate solution to provide necessary mobile phone coverage to the Lockleys area.

Accordingly, this section of the report will demonstrate the following:

- Colocation opportunities and existing telecommunications infrastructure within proximity to the proposed installation; and
- An analysis of the locations considered when determining an appropriate location for a new telecommunications installation within the required coverage area.

Colocation opportunities

The Communications Alliance Ltd. (formerly Australian Communications Industry Forum Ltd. - ACIF) *Industry Code C564:2011 – Mobile Phone Base Station Deployment* promotes the use of existing sites in order to mitigate the effects of facilities on the landscape. It should also be noted that as a first preference Telstra attempts to utilise, where possible, any existing infrastructure or co-location opportunities.

Below is a map of existing and proposed telecommunications facilities surrounding the Lockleys area. The blue marker indicates the location of the proposed telecommunications facility at 2 May Terrace, Lockleys SA 5032.

As shown below there is two nearby identified sites within the search area. The first site is the existing Telstra site that is to be decommissioned. The other existing site being a rooftop which would be a co-site, but there is very little structural security on the rooftop, being a very undesirable option. Therefore, there were no suitable colocation opportunities to provide the required radio frequency coverage objectives.

Candidate	Location	Proposal	Zoning	Description
Candidate A	388 Henley Beach Road, Lockleys, SA 5032	Co-Site rooftop	Residential Zone	Unable to structurally design.
Candidate C 1	2 May Terrace, Lockleys SA 5032.	25m Greenfield Monopole	Community Zone	Land Owner not interest in location
Candidate C 2	2 May Terrace, Lockleys SA 5032.	Greenfield 25m Monopole	Community Zone	Land Owner not interest in location
Candidate C 3	2 May Terrace, Lockleys SA 5032.	25m Greenfield Monopole	Community Zone	Preferred candidate
Candidate C 4	2 May Terrace, Lockleys SA 5032.	25m Greenfield Monopole	Community Zone	Coverage objectives not met

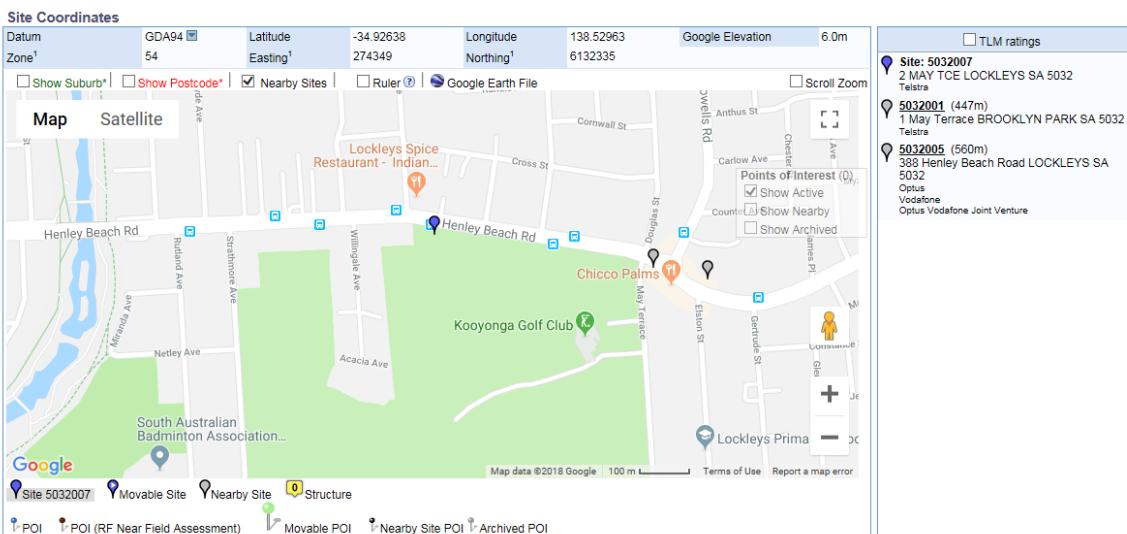


Figure 1: Location of nearby existing telecommunications facilities – Source: RFNSA, www.rfnsa.com.au

Candidates considered

Investigations into the installation of a new telecommunications facility within the Lockleys area have been ongoing, to replace the existing Telstra facility to be decommissioned. These investigations have been to ensure the new facility will replace the coverage of the old facility, while also bring an improved and greater range of coverage.

Five (5) candidates were investigated, including one potential co-site option. Candidate's C4 (Greenfield) was discounted as it could not achieve the necessary RF objectives. Candidate's C1 and C2 (greenfield)

were discounted as the land owner was not interested in pursuing sites in these locations. Candidate A (co-site) was discounted as site could not achieve safe structural design.

This left candidate C3 as the remaining candidate that achieved the RF objectives and had a willing landlord. Therefore candidate C3 was the prime candidate.

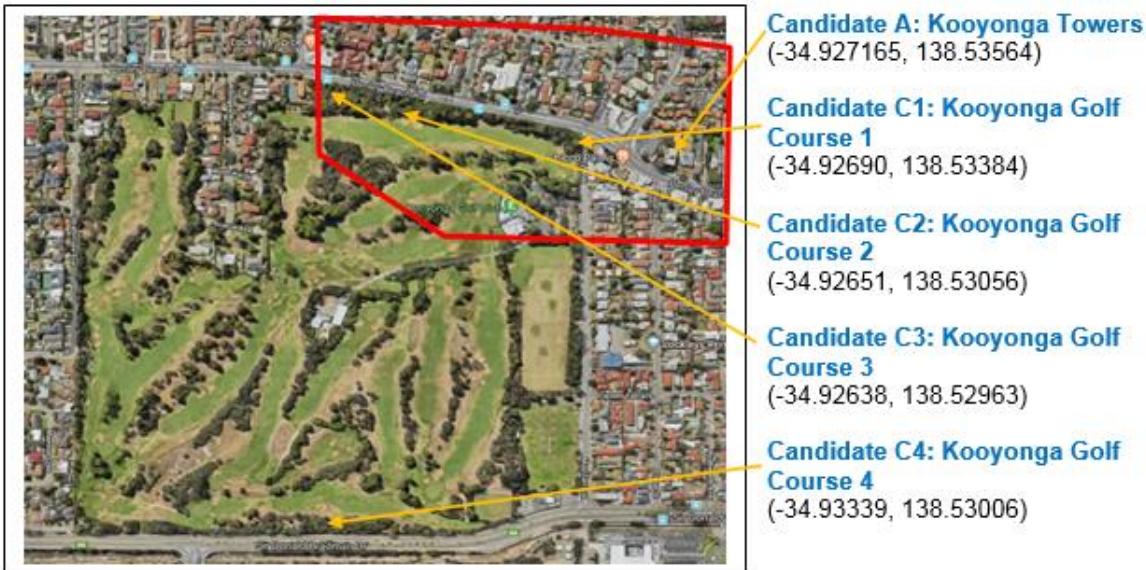


Figure 2: Location of Proposed Candidates

7.1 Nominated Candidate

A preferred nominated candidate was selected for the proposed facility based on the radiofrequency objectives, planning and environmental issues, potential community sensitive uses and engineering criteria, as noted above. In this case, **Candidate C3** (a new 25m Monopole located at 2 May Terrace, Lockleys) was considered the best option. This was based on the following:

- The site will achieve the required coverage objectives for the area;
- The site will meet design and construction considerations; and
- The proposal operates within the regulatory framework of Commonwealth, State and Local Government.

As stated previously, the site selection process carefully considered environmental and visual constraints, existing and future land use characteristics, the orderly planning of the area and the design of the facility. On balance, it is considered that the location and height of the facility ensure optimal service provision to the area whilst careful consideration of the location and design elements have sought to minimise any perceived visual impacts.

The proposed Telstra site has been located and designed to minimise any adverse impact on the amenity of the surrounding area. The site is located 20m from Henley Beach Road (North) and 50m from the western neighbouring residential dwelling.

7.2 The Site and Surrounding Area

The subject site is located at 2 May Terrace, Lockleys SA 5032. The legal description of the property is allotment 72 filed plan 13171 in the area named Lockleys Hundred of Adelaide, Volume 5323 Folio 509. A copy of the Certificate of Title has been attached for information purposes (**Appendix 1 – Certificate of Title**).

The land is on the Kooyonga Golf Club Inc.

The aforementioned land is zoned ‘community’ under the provisions of the West Torrens Council development plan, consolidated 12 July 2018 – refer to **Section 8.1** for additional information on Development Plan and map images.

The site is currently used for recreational purposes as a golf course. The site will be accessed from Henley Beach Road via the a new crossover and access gate. The surrounding land is characterised by residential and minor commercial land uses. More specifically, land within the proposal area is defined as community.

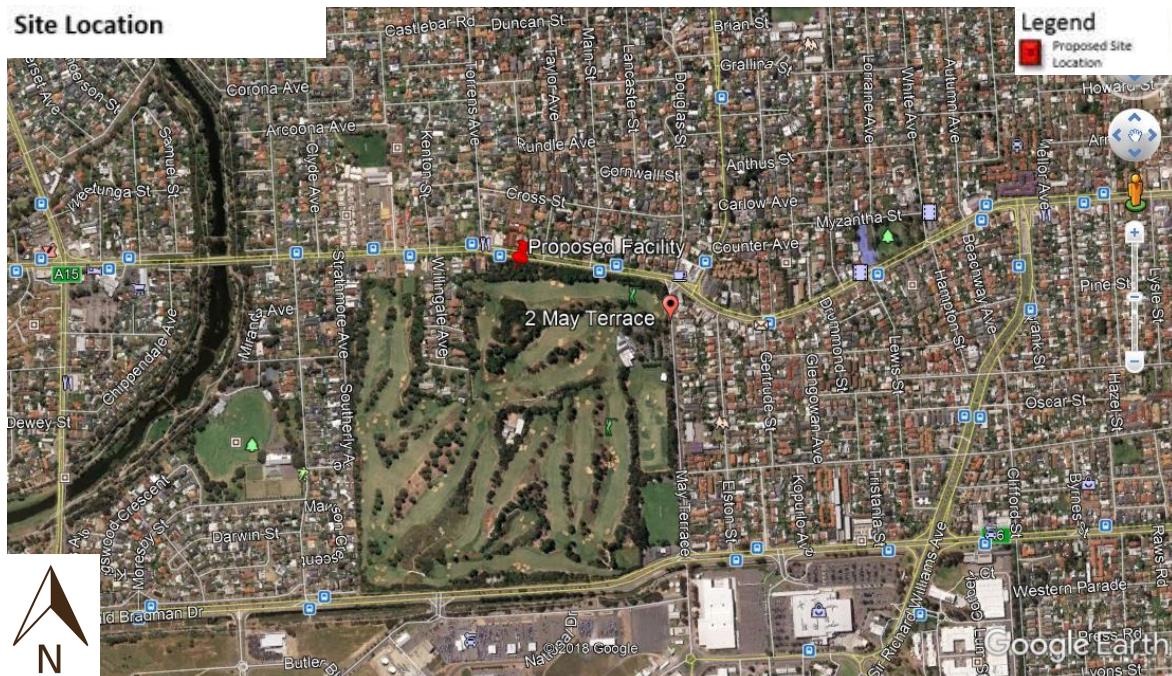


Figure 3: Proposed Telstra Site – 2 May Terrace, Lockleys (Source: Google Earth)

The subject Lot is 58 hectares in size, maintaining a 450m frontage to Henley Beach Road. The land houses two sets of outbuildings utilised for recreational purposes for the Golf Course. The site has up until now operated as a community Golf club.

The proposed telecommunications facility is located to the north/north east of the outbuildings set within an established landscaped perimeter comprising large (up to 20m in height) bushes and trees.

Appropriate setbacks to any identified ‘Sensitive Sites’ have been considered and achieved during the detailed siting of the facility. The closest residential property is approximately 50m west and north of the site location.

The site is not located in an area of environmental significance as defined by *The Telecommunications (Low-Impact Facilities) Determination 1997*.

7.3 Photos of Site and Locality



Proposed site entrance



View of site looking west



View of site looking to east towards site



View of site looking north



Looking towards site from 50m to the west (example site montage)

8.0 The Development Plan

The West Torrens Council Development Plan, consolidated 12 July 2018 provides the planning basis for the West Torrens Council Local Government Area.

The proposed site and surrounding areas are zoned ‘Community’ within the ‘Recreation’ Policy Area 5, Precinct 8 Open Space as shown in **Figure 4** below.

Telecommunications Facilities are a merit form of development within the Community Zone. The general intent of this zone is to benefit the general public with the facilitation of community and recreational facilities.

The Desired Character Statement envisages the accommodation of a variety of recreational, sporting and associated spectator and administrative facilities. Furthermore, the Development will provide a contrast to the open recreational golf course, but will not be impacting on the existing uses of the area by maintaining the open space of the course.

The development will occupy only a small portion of the community zoned land, set within a well-established vegetative screen.

The detailed siting does not restrict the established use of the land (recreational) to attain the zone objectives.

Consideration of the development and potential visual impact is acknowledged as a contributing factor of the zone intent and is discussed in detail below.



Figure 4: Zoning Map (Government of South Australia)

9.0 Planning Assessment

The ERD Court of South Australia has well tested and defined the pathway to which the proper assessment for telecommunications facilities should be undertaken. Principles to that proper assessment include:

- a. that the Development Plan expressly recognises in its objectives, that telecommunications facilities are essential infrastructure required to meet the rapidly increasing community demand for communication technology, and that demand is assumed;
- b. the Development Plan assumes that telecommunications facilities will be constructed in the Council area in order to satisfy the community need for such relevant telecommunication technology;
- c. it is appropriate to ensure that the necessary facilities are constructed in a manner which ensures that coverage is available to satisfy the need (in the target search area and the radio frequency (RF hereafter) technology need in the context of surrounding facilities and demand growth), but in a way which minimises the visual impact of those facilities on the amenity of the local environment.

9.1 Community and Facility Need

In this instance, the need for the facility has been outlined in detail in Part 4 Purpose of the Proposal section of this report. In brief, the development is necessary for Telstra to provide an improved mobile telecommunications capacity to the residential area of Lockleys. This site is to replace/relocate the existing Telstra facility located at 1 May Terrace, which will be decommissioned when the proposed site is active.

Accordingly, the development is considered to be in accordance with Objective 1 and PDC 1(a) of the *Telecommunications Facilities* policy in The West Torrens Council Development Plan.

9.2 Minimisation of Visual Amenity Impact

Several Court Rulings outline how the authority is to consider minimisation of the visual amenity impact of telecommunication facilities, including ERDC Telstra LTD v City of Onkaparinga (2013), Telstra Ltd v Gawler, 2009, SAERDC 2 and FCSC in Hutchison 3G Australia Pty Ltd v City of Mitcham (2005) to name a few.

The courts have resolved that the extent of the visual impact needs to be considered in comparison to the alternative available sites, including low impact facilities. In essence, the authority must consider whether minimisation of visual impact can be better achieved by installation of a facility at some other site or sites. The proviso being that the alternative site must meet the facility demand (*the need*). For the purpose of this proposal, the Council Wide and Zone-specific policies relating to visual impact minimization should be deemed achieved where the above criteria have been demonstrated.

In this instance, there are no existing co-location opportunities that will achieve the need of the facility. The co-site rooftop facility at 388 Henley Beach Road, Lockleys (Candidate A) the design was not structurally possible with the remaining roof space at the site. This is explained in detail above in **Section 7.0**. Accordingly, a greenfield facility is considered the only feasible means of achieving the coverage objectives noted above in Part 4 of this report.

Of the four (4) potentially viable candidates (C1, C2, C3 & C4) Candidate C3 (The Preferred Candidate) is best in terms of minimising the potential visual impact within the locality, along with the land owner agreeing to the site being positioned here (balance of Candidates discounted for not having a willing landlord or failing RF coverage objections as detailed in **Section 7**).

The development is sited as far as feasibly possible away from the more sensitive land uses while being sited away from major vantage points and utilises established vegetation to help screen much of the development.

It is acknowledged that the proposed telecommunications facility will unavoidably have a visual presence in the landscape, however, the structure has been sited and designed to reduce the impacts of the facility as much as technically possible while not compromising the overall need for the facility.

Notwithstanding, Telstra makes every effort to design base station infrastructure that is visually unobtrusive; in this regard, Telstra is proposing to install a 25m monopole which has been sited to maintain the primary use of the land whilst considering the visual impact to the surrounding area. The specific site location was selected as it is maximise the available vegetative screening, whilst also being able to achieve the required coverage objectives. The site carefully considered environmental and visual constraints, existing and future land use characteristics, the orderly planning of the area and the design of the facility. On balance, it is considered that the location and height of the facility ensures optimal service provision to the area whilst minimizing any perceived visual impact.

The monopole in this instance was seen as the preferred structure type due to the overall height required for the facility as well as being the most slimline structure available.

In addition, the site has been set back from as many residential properties as possible and in an area that impacts least on primary view-sheds so that any potential visual impact is minimised as much as technically possible upon the amenity of the surrounding area.

Accordingly, the proposal is considered to be consistent with the relevant Council Wide Telecommunications Facilities Objective 2, PDC 1 (b), (c), (d), (f) and (g), together with the recreational policy area 5 Objective 3.

10.0 EME AND HEALTH

Telstra acknowledges some people are genuinely concerned about the possible health effects of electromagnetic energy (EME) from mobile phone base stations and is committed to addressing these concerns responsibly.

Telstra, along with the other mobile phone carriers, must strictly adhere to Commonwealth Legislation and regulations regarding mobile phone facilities and equipment administered by the Australian Communications and Media Authority (ACMA).

In 2003 the ACMA adopted a technical standard for continuous exposure of the general public to RF EME from mobile base stations. The standard, known as the Radiocommunications (Electromagnetic Radiation – Human Exposure) Standard 2003, was prepared by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and is the same as that recommended by ICNIRP (International Commission for Non- Ionising Radiation Protection), an agency associated with the World Health Organisation (WHO). Mobile carriers must comply with the Australian Standard on exposure to EME set by the ACMA.

The Standard operates by placing a limit on the strength of the signal (or RF EME) that Telstra can transmit to and from any network base station. The general public health standard is not based on distance limitations, or the creation of “buffer zones”. The environmental standard restricts the signal strength to a level low enough to protect everyone at all times. It has a significant safety margin, or precautionary approach, built into it.

In order to demonstrate compliance with the standard, ARPANSA created a prediction report using a standard methodology to analyse the maximum potential impact of any new telecommunications facility. Carriers are obliged to undertake this analysis for each new facility and make it publicly available.

Importantly, the ARPANSA-created compliance report demonstrates the maximum signal strength of a proposed facility, assuming that it's handling the maximum number of user's 24-hours a day.

In this way, ARPANSA requires network carriers to demonstrate the greatest possible impact that a new telecommunications facility could have on the environment, to give the community greater peace of mind. In reality, base stations are designed to operate at the lowest possible power level to accommodate only the number of customers using the facility at any one time. This design function is called "adaptive power control" and ensures that the base station operates at minimum, not maximum, power levels at all times.

Using the ARPANSA standard methodology, Telstra is required to complete and make available an EME report which predicts the maximum environmental EME level the facility will emit. Telstra has undertaken a compliance report that predicts the maximum levels of radiofrequency EME from the proposed installation at the subject site. The maximum environmental EME level predicted from this proposed facility is substantially within the allowable limit under the ARPANSA standard.

Refer to the EME Report attached at Appendix 3.

Telstra relies on the expert advice of national and international health authorities such as the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organisation (WHO) for overall assessments of health and safety impacts.

The WHO advises that all expert reviews on the health effects of exposure to radiofrequency fields have concluded that no adverse health effects have been established from exposure to radiofrequency fields at levels below the international safety guidelines that have been adopted in Australia.

Telstra has strict procedures in place to ensure its mobile phones and base stations comply with these guidelines. Compliance with all applicable EME standards is part of Telstra's responsible approach to EME and mobile phone technology.

11.1 Flora and Fauna

In order to determine any possible natural flora and fauna significance associated with the site, a search was conducted through the relevant environmental searches.

Searches identified the potential of 9 threatened and 13 migratory species of Flora and Fauna significance located in the vicinity of the proposed site. See **Appendix D – Environment Analysis Report** for further information.

The development does not necessitate the removal of any substantial vegetation. It is expected that any required clearing would be minor pruning and will not impact on the aforementioned flora and fauna or impact the visual perceptions of the site.

The site is not located in an area of environmental significance as defined by *The Telecommunications (Low-Impact Facilities) Determination 1997*.

11.2 Access

Access to the proposed site will be via a newly proposed access gate and crossover off Henley Beach Road. In this regard, there is no requirement for special access to the site. (Refer to **Appendix B – Proposal Plans (S1)** for more information)

The proposed site access is considered to be appropriate given the Telstra facility will not be a significant generator of traffic. Once operational the facility will require maintenance visits approximately 3 to 4 times per year as required but will remain unattended at all other times. As the facility generates minimal visits per year it is considered that traffic interference will be negligible.

During the construction phase various vehicles will be used to deliver equipment and construct the Telstra Mobile Base Station Facility. Any traffic impacts associated with construction and establishment will be of a short-term duration (i.e. approximately five weeks over non-consecutive periods) and are not anticipated to adversely impact on the surrounding road network. Adequate parking would be available in the vicinity for vehicles used during construction and these movements would not impact upon local traffic. In the unlikely event that a road closure is required Telstra will apply to the relevant authorities for permission.

11.3 Utilities

An application has been made to the local utility company confirming route and availability of power supply for this site. The proposed site does not require any additional permits for the connection of a sewer/roadway.

11.4 Construction

The construction of the mobile base station will take approximately 5 weeks over non-consecutive periods, subject to weather.

Noise and vibration emissions associated with the Telstra Mobile Base Station Facility will be limited to the construction phase. Noise generated during the construction phase will be of short duration and will be in accordance with the standards outlined in the *Environmental Protection (Noise) Regulations 2007*. Construction works will only occur between the hours of 7am and 6pm.

There will be some low level noise from the ongoing operation of air conditioning equipment associated with the equipment shelter once it is installed. Noise emanating from the air conditioning equipment is at a comparable level to a domestic air conditioning installation and will generally accord with the background noise levels prescribed by Australian Standard AS1055.

The proposed site is appropriately setback from residential properties so that the noise related impacts will be negligible.

11.5 Bushfire

The specific site location is not identified as a Bushfire Protection Area (See **Figure 5**).

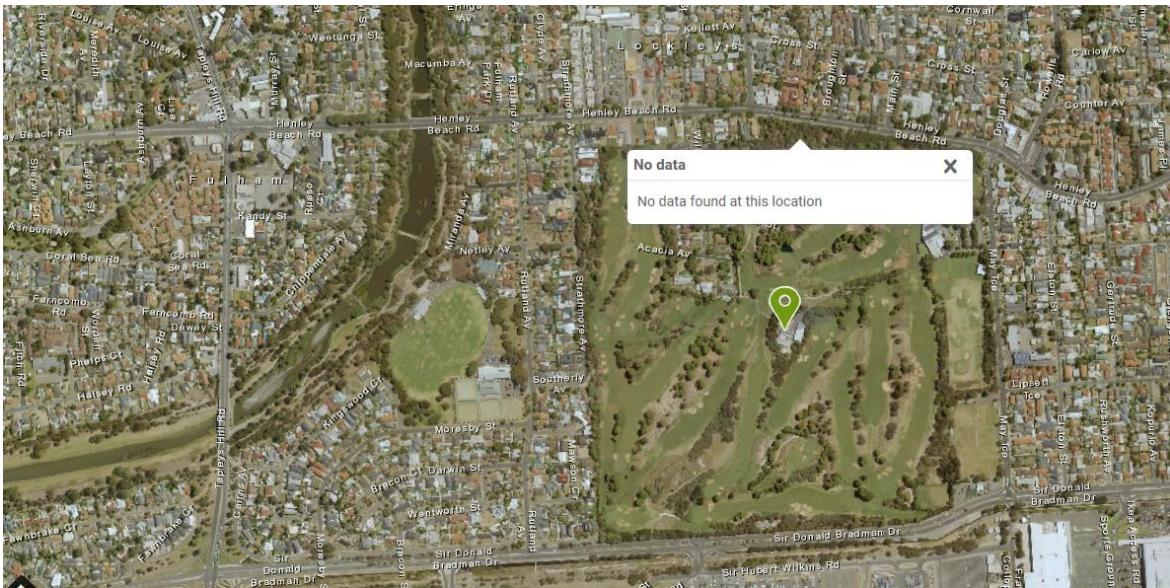


Figure 5 – Bushfire Prone Areas Mapping (Government of South Australia)

Natural disasters, including the continuing threat of bushfires, have served to highlight the critical importance of effective telecommunications. Previous bushfire incident reviews have demonstrated effective telecommunications networks are essential for disaster response management, allowing emergency services providers to be alerted to medical or fire emergencies.

In its *Communications Report 2014-2015* the Australian Communications and Media Authority reported that in 2014 -15, 66.9% of calls to the 000 emergency number were made from mobile phones. Therefore, in addition to day-to-day, personal and business applications, effective telecommunications networks can be the difference between life and death in disaster situations.

While the development is located close to existing vegetation, this need is considered appropriate in this instance to balance the need to minimise potential visual impact. Moreover, the entirety of the facility will be earthed in accordance with the Australian Standard. Earthing draws any lightning strike underground and away from combustible material. It is submitted that contrary to being a risk factor for fires, the site in this case could reduce the risk of fires caused by lightning strikes, by attracting the lightning strike and earthing it underground.

12.0 Conclusion

This application seeks to facilitate the development of telecommunications infrastructure within the Lockleys area, comprising community/recreational land uses by seeking planning consent of a new Telstra 25m monopole as well as the installation of antennas and ancillary equipment.

The facility has been strategically sited and designed to balance the need for the facility and minimise potential visual impact within broader environment as much as practicable. In this regard, Telstra considers that the proposal satisfies the requirements of the Development Plan, whilst also addressing coverage deficiencies within the local area.

In summary, the proposal is considered to warrant the granting of Development Plan Consent by the West Torrens Council for the following reasons:

- a. The proposed telecommunication facility is needed to provide improved capacity to area of Lockleys and to fill in coverage after the decommissioning of the existing Lockleys site.
- b. The proposal is the best candidate in terms of achieving all coverage objectives (the need), buildability, acquisition and town planning considerations of the viable candidates identified;
- c. The development will not prejudice the existing or future development of land within the Community Zone;
- d. The visual impacts of the proposal have been minimised, in particular:
 - i. Detailed siting adequately maximises use of screening by established vegetation
 - ii. The site is located as far away as practical from neighbouring more sensitive land uses
 - iii. The site is appropriately located on high land, yet away from major view-sheds – particularly from residential land uses.
 - iv. The monopole is the most slimline structure available to minimise the bulk of the proposal
- e. The proposed facility will not have a significant adverse environmental impact on the subject site and the surrounding area;
- f. The proposal will be available for future co-location purposes should other carriers wish to pursue the option as envisaged in the development plan; and,
- g. There will be no material impact on the established land use of the land or the intention of the Community Zone policies.

On balance, the proposed development is generally consistent with all relevant policies in the West Torrens Council Development Plan and warrants the granting of Development Plan Consent.



Appendix C – Environmental EME Report

Environmental EME Report

Location	2 MAY TCE, LOCKLEYS SA 5032	
Date	23/08/2018	RFNSA No. 5032007

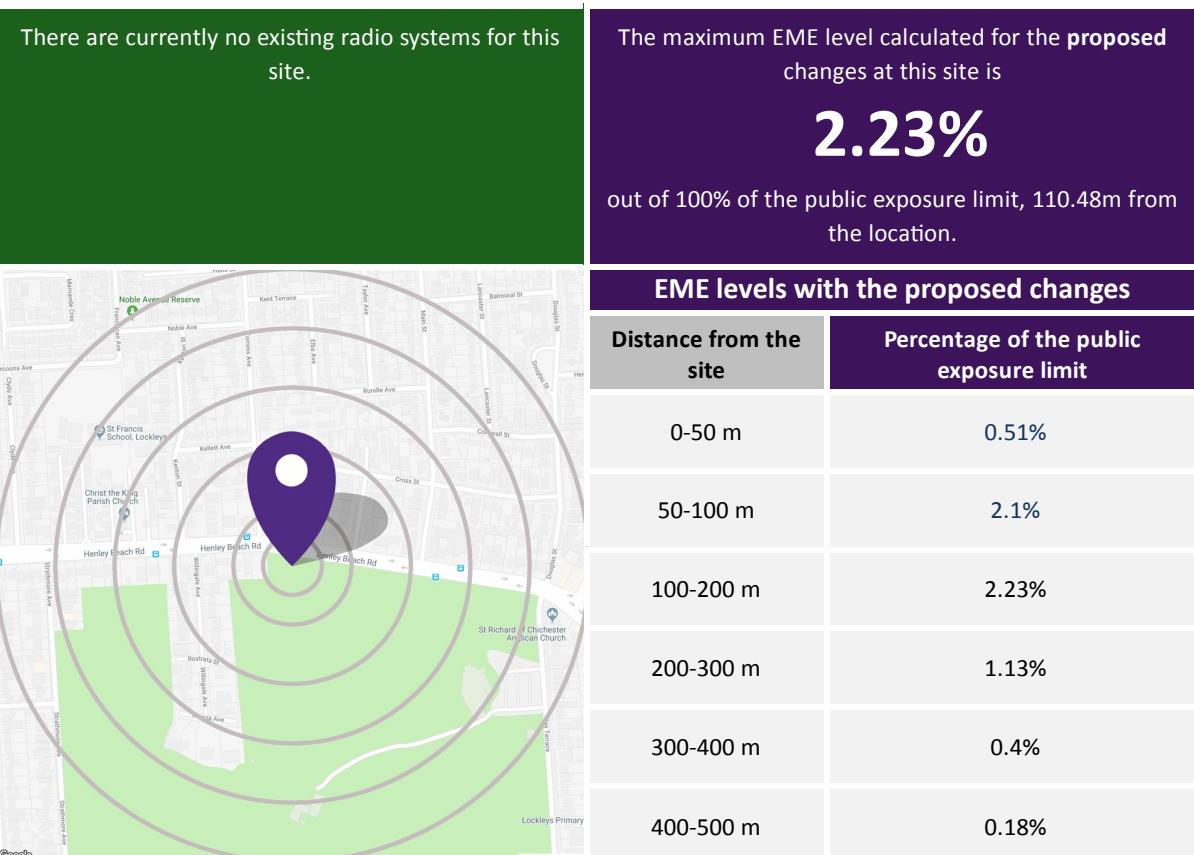
How does this report work?

This report provides a summary of levels of radiofrequency (RF) electromagnetic energy (EME) around the wireless base station at 2 MAY TCE, LOCKLEYS SA 5032. These levels have been calculated by Telstra using methodology developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).

A document describing how to interpret this report is available at ARPANSA's website:

[A Guide to the Environmental Report.](#)

A snapshot of calculated EME levels at this site



For additional information please refer to the EME ARPANSA Report annexure for this site which can be found at <http://www.rfnsa.com.au/5032007>.

Radio systems at the site

This base station currently has equipment for transmitting the services listed under the existing configuration. The proposal would modify the base station to include all the services listed under the proposed configuration.

Carrier	Existing		Proposed	
	Systems	Configuration	Systems	Configuration
Telstra			3G, 4G, 4GX	WCDMA850 (proposed), LTE700 (proposed), LTE1800 (proposed), LTE2100 (proposed), LTE2600 (proposed)

An in-depth look at calculated EME levels at this site

This table provides calculations of RF EME at different distances from the base station for emissions from existing equipment alone and for emissions from existing equipment and proposed equipment combined. All EME levels are relative to 1.5 m above ground and all distances from the site are in 360° circular bands.

Distance from the site	Existing configuration			Proposed configuration		
	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
0-50m				4.27	48.47	0.51%
50-100m				7.25	139.41	2.1%
100-200m				7.81	161.73	2.23%
200-300m				5.88	91.76	1.13%
300-400m				3.55	33.5	0.4%
400-500m				2.4	15.23	0.18%

Calculated EME levels at other areas of interest

This table contains calculations of the maximum EME levels at selected areas of interest, identified through consultation requirements of the [Communications Alliance Ltd Deployment Code C564:2011](#) or other means. Calculations are performed over the indicated height range and include all existing and any proposed radio systems for this site.

Maximum cumulative EME level for the proposed configuration

Location	Height range	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
No locations identified				



Appendix D – Environment Analysis Report (EPBC)



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected.

Information on the coverage of this report and qualifications on data supporting this report are contained in the caveat at the end of the report.

Information is available about [Environment Assessments](#) and the EPBC Act including significance guidelines, forms and application process details.

Report created: 16/10/18 15:53:15

[Summary](#)

[Details](#)

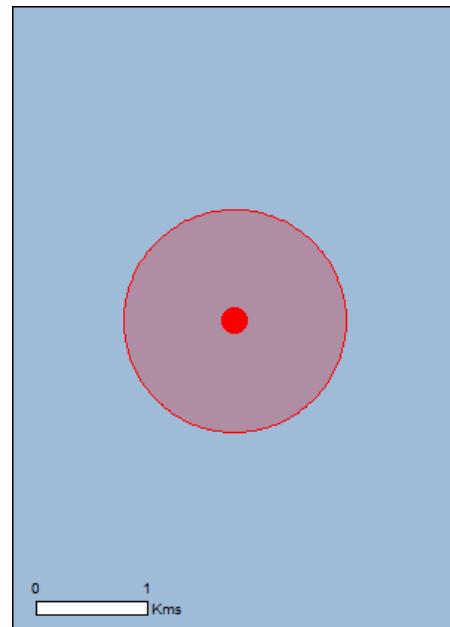
[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

[Acknowledgements](#)



This map may contain data which are
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[Coordinates](#)

[Buffer: 1.0Km](#)



Summary

Matters of National Environmental Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	None
National Heritage Places:	None
Wetlands of International Importance:	None
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	None
Listed Threatened Ecological Communities:	None
Listed Threatened Species:	9
Listed Migratory Species:	13

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <http://www.environment.gov.au/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Land:	1
Commonwealth Heritage Places:	None
Listed Marine Species:	19
Whales and Other Cetaceans:	None
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	None

Extra Information

This part of the report provides information that may also be relevant to the area you have nominated.

State and Territory Reserves:	None
Regional Forest Agreements:	None
Invasive Species:	37
Nationally Important Wetlands:	None
Key Ecological Features (Marine)	None

Details

Matters of National Environmental Significance

Listed Threatened Species		[Resource Information]	
Name	Status	Type of Presence	
Birds			
<u><i>Botaurus poiciloptilus</i></u>			
Australasian Bittern [1001]	Endangered	Species or species habitat known to occur within area	
<u><i>Calidris canutus</i></u>			
Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area	
<u><i>Calidris ferruginea</i></u>			
Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area	
<u><i>Grantiella picta</i></u>			
Painted Honeyeater [470]	Vulnerable	Species or species habitat may occur within area	
<u><i>Numenius madagascariensis</i></u>			
Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area	
<u><i>Pedionomus torquatus</i></u>			
Plains-wanderer [906]	Critically Endangered	Species or species habitat may occur within area	
<u><i>Rostratula australis</i></u>			
Australian Painted-snipe, Australian Painted Snipe [77037]	Endangered	Species or species habitat may occur within area	
Mammals			
<u><i>Pteropus poliocephalus</i></u>			
Grey-headed Flying-fox [186]	Vulnerable	Foraging, feeding or related behaviour likely to occur within area	
Plants			
<u><i>Caladenia tensa</i></u>			
Greencomb Spider-orchid, Rigid Spider-orchid [24390]	Endangered	Species or species habitat likely to occur within area	
Listed Migratory Species		[Resource Information]	
* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.			
Name	Threatened	Type of Presence	
Migratory Marine Birds			
<u><i>Apus pacificus</i></u>			
Fork-tailed Swift [678]		Species or species habitat likely to occur within area	
Migratory Terrestrial Species			

Name	Threatened	Type of Presence
<i>Motacilla cinerea</i> Grey Wagtail [642]		Species or species habitat may occur within area
<i>Motacilla flava</i> Yellow Wagtail [644]		Species or species habitat may occur within area
<i>Myiagra cyanoleuca</i> Satin Flycatcher [612]		Species or species habitat may occur within area
Migratory Wetlands Species		
<i>Actitis hypoleucus</i> Common Sandpiper [59309]		Species or species habitat known to occur within area
<i>Calidris acuminata</i> Sharp-tailed Sandpiper [874]		Species or species habitat known to occur within area
<i>Calidris canutus</i> Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
<i>Calidris ferruginea</i> Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
<i>Calidris melanotos</i> Pectoral Sandpiper [858]		Species or species habitat likely to occur within area
<i>Gallinago hardwickii</i> Latham's Snipe, Japanese Snipe [863]		Species or species habitat may occur within area
<i>Numenius madagascariensis</i> Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
<i>Pandion haliaetus</i> Osprey [952]		Species or species habitat may occur within area
<i>Tringa nebularia</i> Common Greenshank, Greenshank [832]		Species or species habitat likely to occur within area

Other Matters Protected by the EPBC Act

Commonwealth Land	[Resource Information]	
The Commonwealth area listed below may indicate the presence of Commonwealth land in this vicinity. Due to the unreliability of the data source, all proposals should be checked as to whether it impacts on a Commonwealth area, before making a definitive decision. Contact the State or Territory government land department for further information.		
Name		
Commonwealth Land -		
Listed Marine Species	[Resource Information]	
* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.		
Name	Threatened	Type of Presence
Birds		
<i>Actitis hypoleucus</i> Common Sandpiper [59309]		Species or species habitat known to occur within area

Name	Threatened	Type of Presence
<i>Apus pacificus</i> Fork-tailed Swift [678]		Species or species habitat likely to occur within area
<i>Ardea alba</i> Great Egret, White Egret [59541]		Species or species habitat known to occur within area
<i>Ardea ibis</i> Cattle Egret [59542]		Species or species habitat may occur within area
<i>Calidris acuminata</i> Sharp-tailed Sandpiper [874]		Species or species habitat known to occur within area
<i>Calidris canutus</i> Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
<i>Calidris ferruginea</i> Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
<i>Calidris melanotos</i> Pectoral Sandpiper [858]		Species or species habitat likely to occur within area
<i>Chrysococcyx osculans</i> Black-eared Cuckoo [705]		Species or species habitat likely to occur within area
<i>Gallinago hardwickii</i> Latham's Snipe, Japanese Snipe [863]		Species or species habitat may occur within area
<i>Haliaeetus leucogaster</i> White-bellied Sea-Eagle [943]		Species or species habitat likely to occur within area
<i>Merops ornatus</i> Rainbow Bee-eater [670]		Species or species habitat may occur within area
<i>Motacilla cinerea</i> Grey Wagtail [642]		Species or species habitat may occur within area
<i>Motacilla flava</i> Yellow Wagtail [644]		Species or species habitat may occur within area
<i>Myiagra cyanoleuca</i> Satin Flycatcher [612]		Species or species habitat may occur within area
<i>Numenius madagascariensis</i> Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
<i>Pandion haliaetus</i> Osprey [952]		Species or species habitat may occur within area
<i>Rostratula benghalensis (sensu lato)</i> Painted Snipe [889]	Endangered*	Species or species habitat may occur within area
<i>Tringa nebularia</i> Common Greenshank, Greenshank [832]		Species or species habitat likely to occur within area

Extra Information

Invasive Species	[Resource Information]	
Name	Status	Type of Presence
Birds		
<i>Acridotheres tristis</i> Common Myna, Indian Myna [387]		Species or species habitat likely to occur within area
<i>Alauda arvensis</i> Skylark [656]		Species or species habitat likely to occur within area
<i>Anas platyrhynchos</i> Mallard [974]		Species or species habitat likely to occur within area
<i>Carduelis carduelis</i> European Goldfinch [403]		Species or species habitat likely to occur within area
<i>Carduelis chloris</i> European Greenfinch [404]		Species or species habitat likely to occur within area
<i>Columba livia</i> Rock Pigeon, Rock Dove, Domestic Pigeon [803]		Species or species habitat likely to occur within area
<i>Passer domesticus</i> House Sparrow [405]		Species or species habitat likely to occur within area
<i>Pycnonotus jocosus</i> Red-whiskered Bulbul [631]		Species or species habitat likely to occur within area
<i>Streptopelia chinensis</i> Spotted Turtle-Dove [780]		Species or species habitat likely to occur within area
<i>Sturnus vulgaris</i> Common Starling [389]		Species or species habitat likely to occur within area

Name	Status	Type of Presence
<i>Turdus merula</i> Common Blackbird, Eurasian Blackbird [596]		Species or species habitat likely to occur within area
Mammals		
<i>Bos taurus</i> Domestic Cattle [16]		Species or species habitat likely to occur within area
<i>Canis lupus familiaris</i> Domestic Dog [82654]		Species or species habitat likely to occur within area
<i>Capra hircus</i> Goat [2]		Species or species habitat likely to occur within area
<i>Felis catus</i> Cat, House Cat, Domestic Cat [19]		Species or species habitat likely to occur within area
<i>Lepus capensis</i> Brown Hare [127]		Species or species habitat likely to occur within area
<i>Mus musculus</i> House Mouse [120]		Species or species habitat likely to occur within area
<i>Oryctolagus cuniculus</i> Rabbit, European Rabbit [128]		Species or species habitat likely to occur within area
<i>Rattus norvegicus</i> Brown Rat, Norway Rat [83]		Species or species habitat likely to occur within area
<i>Rattus rattus</i> Black Rat, Ship Rat [84]		Species or species habitat likely to occur within area
<i>Sus scrofa</i> Pig [6]		Species or species habitat likely to occur within area
<i>Vulpes vulpes</i> Red Fox, Fox [18]		Species or species habitat likely to occur within area
Plants		
<i>Asparagus asparagoides</i> Bridal Creeper, Bridal Veil Creeper, Smilax, Florist's Smilax, Smilax Asparagus [22473]		Species or species habitat likely to occur within area
<i>Chrysanthemoides monilifera</i> Bitou Bush, Boneseed [18983]		Species or species habitat may occur within area
<i>Chrysanthemoides monilifera</i> subsp. <i>monilifera</i> Boneseed [16905]		Species or species habitat likely to occur within area
<i>Cylindropuntia</i> spp. Prickly Pears [85131]		Species or species habitat likely to occur within area
<i>Genista linifolia</i> Flax-leaved Broom, Mediterranean Broom, Flax Broom [2800]		Species or species habitat likely to occur within area
<i>Genista monspessulana</i> Montpellier Broom, Cape Broom, Canary Broom, Common Broom, French Broom, Soft Broom		Species or species habitat likely to occur

Name	Status	Type of Presence within area
[20126] Lantana camara Lantana, Common Lantana, Kamara Lantana, Large-leaf Lantana, Pink Flowered Lantana, Red Flowered Lantana, Red-Flowered Sage, White Sage, Wild Sage [10892]		Species or species habitat may occur within area
Lycium ferocissimum African Boxthorn, Boxthorn [19235]		Species or species habitat likely to occur within area
Nassella neesiana Chilean Needle grass [67699]		Species or species habitat likely to occur within area
Opuntia spp. Prickly Pears [82753]		Species or species habitat likely to occur within area
Rubus fruticosus aggregate Blackberry, European Blackberry [68406]		Species or species habitat likely to occur within area
Salix spp. except S.babylonica, S.x calodendron & S.x reichardtii Willows except Weeping Willow, Pussy Willow and Sterile Pussy Willow [68497]		Species or species habitat likely to occur within area
Solanum elaeagnifolium Silver Nightshade, Silver-leaved Nightshade, White Horse Nettle, Silver-leaf Nightshade, Tomato Weed, White Nightshade, Bull-nettle, Prairie-berry, Satansbos, Silver-leaf Bitter-apple, Silverleaf-nettle, Trompillo [12323]		Species or species habitat likely to occur within area
Tamarix aphylla Athel Pine, Athel Tree, Tamarisk, Athel Tamarisk, Athel Tamarix, Desert Tamarisk, Flowering Cypress, Salt Cedar [16018]		Species or species habitat likely to occur within area
Ulex europaeus Gorse, Furze [7693]		Species or species habitat likely to occur within area

Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

Coordinates

-34.92638 138.52963

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [Office of Environment and Heritage, New South Wales](#)
- [Department of Environment and Primary Industries, Victoria](#)
- [Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [Department of Environment, Water and Natural Resources, South Australia](#)
- [Department of Land and Resource Management, Northern Territory](#)
- [Department of Environmental and Heritage Protection, Queensland](#)
- [Department of Parks and Wildlife, Western Australia](#)
- [Environment and Planning Directorate, ACT](#)
- [Birdlife Australia](#)
- [Australian Bird and Bat Banding Scheme](#)
- [Australian National Wildlife Collection](#)
- Natural history museums of Australia
- [Museum Victoria](#)
- [Australian Museum](#)
- [South Australian Museum](#)
- [Queensland Museum](#)
- [Online Zoological Collections of Australian Museums](#)
- [Queensland Herbarium](#)
- [National Herbarium of NSW](#)
- [Royal Botanic Gardens and National Herbarium of Victoria](#)
- [Tasmanian Herbarium](#)
- [State Herbarium of South Australia](#)
- [Northern Territory Herbarium](#)
- [Western Australian Herbarium](#)
- [Australian National Herbarium, Canberra](#)
- [University of New England](#)
- [Ocean Biogeographic Information System](#)
- [Australian Government, Department of Defence](#)
- [Forestry Corporation, NSW](#)
- [Geoscience Australia](#)
- [CSIRO](#)
- [Australian Tropical Herbarium, Cairns](#)
- [eBird Australia](#)
- [Australian Government – Australian Antarctic Data Centre](#)
- [Museum and Art Gallery of the Northern Territory](#)
- [Australian Government National Environmental Science Program](#)
- [Australian Institute of Marine Science](#)
- [Reef Life Survey Australia](#)
- [American Museum of Natural History](#)
- [Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact Us](#) page.

In reply please quote 2018/01931, Process ID: 551707
Enquiries to Reece Loughron
Telephone (08) 7109 7876
E-mail dpti.luc@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure

DEVELOPMENT DIVISION
Transport Assessment
and Policy Reform

4 January 2019

GPO Box 1533
Adelaide SA 5001

ABN 92 366 288 135

Mr Benjamin Williams
State Commission Assessment Panel
GPO Box 1815
ADELAIDE SA 5001

Dear Mr Williams,

SCHEDULE 8 - REFERRAL RESPONSE

Development No.	211/L025/18
Applicant	Visionstream
Location	2 May Terrace, Lockleys (CT 5323/509, Lot 72 in FP 13171)
Proposal	Construction of a telecommunications tower

I refer to the above development application forwarded to the Commissioner of Highways (CoH) in accordance with Section 37 of the *Development Act 1993*. The proposed development involves development adjacent a main road as described above.

The following response is provided in accordance with Section 37(4)(b) of the *Development Act 1993* and Schedule 8 of the *Development Regulations 2008*.

CONSIDERATION

The telecommunications tower is located on portion of Lot 72 in FP 13171 adjacent Henley Beach Road and is proposed to be accessed from Henley Beach Road via a new crossover and gate. The adjacent section of Henley Beach Road is under the care, control and management of the CoH and is identified as a Priority Public Transport Corridor and Major Cycling Route under the Department of Planning, Transport and Infrastructure's (DPTI's) '*A Functional Hierarchy for South Australia's Land Transport Network*'. At this location, Henley Beach Road carries approximately 20,900 vehicles per day (3.5% commercial vehicles) and has a posted speed limit of 60 km/h.

Access and Road Safety

Visionsteam Site Access and Locality Plan (Drawing No. S107674, Sheet 1, Issue 1, dated 12 October 2018), indicates that the proposed access will be located approximately 12 metres east of bus stop 15 and will be within a dedicated bus zone as delineated by a bus zone sign. As the proposed access location may interfere with the operation of the bus stop, especially during the construction period, it is recommended that the access be relocated to be outside the bus zone. Accordingly, the access should be a minimum of 20 metres east of the bus stop.

The Plan shows that the access is proposed to be 3.0 metres in width at the property boundary and be flared to the kerbline. Furthermore, the access gates are proposed to be setback 5.0 metres from the roadway. Whilst the access width is acceptable given the low traffic use expected, DPTI require the access gates to be setback 5.0 metres from the Henley Beach Road property boundary to enable a car to be located clear of the footpath whilst the gates are being opened/closed.

The Planning Assessment Report (Project No. SN13089.02 dated October 2018) indicates that the traffic impacts associated with the construction phase will be short term and that once the facility is operational it will require maintenance visits approximately 3 to 4 times per year. Accordingly, the proposed development is not expected to unduly impact Henley Beach Road. However, sufficient on-site manoeuvring areas should be provided to ensure all vehicles can enter and exit the site in a forward direction during typical maintenance periods.

It is likely that large vehicles will require access to the site during the construction phase of the project. Subsequently, should traffic flows on Henley Beach Road be expected to be affected during construction, the applicant must contact DPTI's Traffic Management Centre on telephone 1800 018 313 to arrange for the necessary permit/approvals. A suitable Traffic Management Plan may be required in order to safely manage traffic flows along this section of road.

Aviation

In accordance with the Adelaide Airport Obstacle Limitation Surface (OLS) and Part 139 of the Civil Aviation Regulations 1998 (CASR), the monopole is under the height restrictions as specified. However, it would be advisable for the applicant to notify Adelaide Airport Limited, as the appropriate Aeronautical Information Service provider, of the location and height of the monopole.

CONCLUSION

Whilst no in-principle objections are raised to the proposed development, the proposed access is located within a dedicated bus zone as delineated by a bus zone sign and thus may interfere with the operation of the bus stop, especially during the construction period. It is recommended that the access be relocated to be outside the bus zone. Accordingly, the access should be a minimum of 20 metres east of the bus stop. Furthermore, any approval granted should include the following conditions:

1. All vehicles shall enter and exit the site in a forward direction.
2. Stormwater run-off shall be collected on-site and discharged without jeopardising the safety and integrity of Henley Beach Road. Any alterations to the road drainage infrastructure required to facilitate this shall be at the applicant's expense.

The following notes provide important information for the benefit of the applicant and are required to be included in any approval:

- Should traffic flows on Henley Beach Road be expected to be impacted during construction, the applicant must contact DPTI's Traffic Management Centre on telephone 1800 018 313 to obtain the necessary permit for works on/or adjacent to the arterial road. A Traffic Management Plan may be required in order to safely manage traffic flows along this section of road.

- The applicant should notify Adelaide Airport Limited, as the appropriate Aeronautical Information Service provider, of the location and height of the monopole.

Yours sincerely,



for **MANAGER, TRANSPORT ASSESSMENT AND POLICY REFORM**
for **COMMISSIONER OF HIGHWAYS**

A copy of the decision notification form should be forwarded to dpti.developmentapplications@sa.gov.au

Our Reference: 3.38.03.01
Application Reference:

17 December 2018

Department of Planning, Transport & Infrastructure
GPO Box 1815
ADELAIDE SA 5001

DEVELOPMENT NO: 211/L025/18
APPLICANT: Visionstream
NATURE OF DEVELOPMENT: installation of one (1) 25m Monopole
SUBJECT LAND: 2 MAY TCE LOCKLEYS SA 5032

Adelaide Airport Limited has no objection to the above proposal.

The Owner/Developer need to be advised of the following:

- a) The monopole at a height of RL32.2m Australian Height Datum (AHD) as described does not penetrate the Adelaide Airport Obstacle Limitation Surface (OLS) airspace protected for aircraft operations. Any further proposed addition to the structure, including aerials, masts and vent/exhaust stacks, must be subject to a separate assessment.
- b) Crane operations associated with construction shall be the subject of separate application. Adelaide Airport Limited requires 48 days prior notice of any crane operations during the construction. Crane assessment may also have to be conducted by the Civil Aviation Safety Authority (CASA).
- c) Restrictions may apply to lighting illumination. Any lighting proposed shall conform to airport lighting restrictions and shall be shielded from aircraft flight paths.

Should you require any additional information or wish to discuss this matter further please contact the undersigned on 8308 9245.

Yours faithfully



Brett Eaton
AIRSIDE OPERATIONS MANAGER
ADELAIDE & PARAFIELD AIRPORTS



Adelaide Airport Limited
1 James Schofield Drive
Adelaide Airport
South Australia 5950

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adelaideairport.com.au
ABN 78 075 176 653



30 November 2018

State Commission Assessment Panel
GPO Box 1815
ADELAIDE SA 5001

Dear Sir / Madam

COUNCIL APPLICATION: 211/1168/2018
APPLICANT: VISIONSTREAM
SCAP APPLICATION: 211/L025/18
SUBJECT LAND: 2 May Terrace, LOCKLEYS SA 5032
PROPOSAL: Construction of a telecommunications tower

Pursuant to Regulation 38 (2)(b) of the Development Regulations 2008, we advise that Council wishes to make the following comments on the proposed development described above:

From a visual perspective, Council would prefer to see the tower located further into the site and away from public space along Henley Beach Road, notwithstanding the options considered for colocation and other candidate sites that need to satisfy the requirements of the installation. Council concurs that the existing vegetation will screen the equipment shelter and ground infrastructure as well as the lower portion of the proposed monopole to some degree, however given the 26 metre overall height there will be unavoidable visual impact on the locality. An additional 10-15m further south into the site, if possible, would assist in further screening the infrastructure from public spaces.

Please contact the Council if further information regarding this advice is required.

Yours faithfully

A handwritten signature in black ink, appearing to read "Josh Banks".

Josh Banks
Senior Development Officer
City Development



12/12/18

City of West Torrens
165 Sir Donald Bradman Drive
Hilton SA 5033

Dear Josh,

Council Application: 211/1168/2018
SCAP Application: 211/L025/18
Subject land: 2 May Terrace, Lockleys SA 5032
Proposal: Construction of a Telecommunications Tower

In regards to councils comments on the proposal for a telecommunications tower at 2 May Terrace, Lockleys, the facility has been moved as far as practical away from the road frontage as possible. This has been previously negotiated with the land owner, as the tower being pushed any further south would encroach on the golf course area/general play area- which is not supported by the land owner as it would create a much larger visual impact upon the established recreational area. Furthermore, the movement of the facility away from the road would create very little further screening from the public spaces from the north, but create a great impact upon the recreational area of the golf courses playing area.

The proposed detailed siting seeks to achieve the best balance between minimising the potential visual impact of the proposal, while not detracting from the established use of the land while remaining capable of achieving the coverage objectives necessary for the proposal. On balance, it is my view that the proposed location successfully balances these objectives.

Please do not hesitate to contact me if you have any further enquiries.

Kind Regards,

Stefan Kaldis
Town Planner

Visionstream Australia Pty Ltd ABN 85 093 384 680
72 Kinkaid Avenue, North Plympton SA 5037
T 08 8406 0982
M 0423 237 920



E Stefan.Kaldis@visionstream.com.au
W www.visionstream.com.au

Williams, Ben (DPTI)

From: Josh Banks <jbanks@wtcc.sa.gov.au>
Sent: Wednesday, 12 December 2018 1:34 PM
To: Williams, Ben (DPTI)
Subject: RE: Application 211/L025/18

Hi Benjamin,

Thanks for the correspondence. Council has no further comment to make.

Regards,

Josh Banks
Senior Development Officer - APPS
City of West Torrens
165 Sir Donald Bradman Drive
Hilton SA 5033

Ph: (08) 8416 6333
Email: jbanks@wtcc.sa.gov.au

From: Williams, Ben (DPTI) [mailto:Ben.Williams2@sa.gov.au]
Sent: Tuesday, 11 December 2018 5:14 PM
To: Josh Banks <jbanks@wtcc.sa.gov.au>
Subject: FW: Application 211/L025/18

Hi Josh,

For reference – the response from applicant regarding your referral advice.

Please confirm if you have any further comment to make.

Kind regards,

Benjamin Williams
Planning Officer
Planning and Development Section
Development Division
Department of Planning, Transport and Infrastructure
T 7109 7023 • E ben.williams2@sa.gov.au
Level 5, 50 Flinders Street Adelaide SA 5000 • GPO Box 1815 Adelaide SA 5000 • DX 171
www.dpti.sa.gov.au • view the [SA Planning Portal](#) • subscribe to our [newsletters](#)



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From: Stefan Kaldis [<mailto:Stefan.Kaldis@visionstream.com.au>]

Sent: Tuesday, 11 December 2018 4:45 PM

To: Williams, Ben (DPTI) <Ben.Williams2@sa.gov.au>

Subject: RE: Application 211/L025/18

Hi Ben,

Thanks for that – I have attached our response for the councils RFI above.

Kind Regards

Stefan Kaldis
Town Planner

Visionstream Australia Pty Ltd ABN 85 093 384 680

72 Kinkaid Avenue, North Plympton SA 5037

T 08 8406 0982

M 0423 237 920



E Stefan.Kaldis@visionstream.com.au

W www.visionstream.com.au

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**South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3**

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Alex Marinos (Kavatol's) **My phone number:** 0417 815850

Primary method(s) of contact: **Email:** amarinos0212@gmail.com
Postal Address: 8/432 Henley Bch Rd. **Postcode:** 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:** (please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

8/432 Henley Bch Rd, Lockleys SA

Postcode

5032

- My interests are:** (please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are: It's unclear exactly where the facility will be placed on the golf course at the boundary & what this will visually look like. Also what are the effects of living so close to the tower?

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)

- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature:

Date:

26/12/18

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scareps@sa.gov.au

Williams, Ben (DPTI)

From: DPTI:scapreps
Sent: Monday, 7 January 2019 12:23 PM
To: Williams, Ben (DPTI)
Subject: FW: telecommunications facility - 2 May Terrace, Lockleys - Kooyonga
Attachments: Alex Marinos - Lockleys Tower.pdf

From: Alexandra Marinos [mailto:amarinos0212@gmail.com]
Sent: Wednesday, 2 January 2019 9:15 AM
To: DPTI:scapreps <scapreps@sa.gov.au>
Cc: Chris Marinos <c_marinos@hotmail.com>
Subject: telecommunications facility - 2 May Terrace, Lockleys - Kooyonga

Hello, please find attached my completed form regarding the construction of a telecommunications facility comprising of a mono-pole and associated antennas etc at 2 May Terrace, Lockleys - Kooyonga Golf Course) - Henley Beach Rd boundary.

Please note I am happy to discuss the facility given the opportunity and I am opposed to the location for a number of reasons including:-

- the unknown effects of living so close to a tower medically (I have a young family)
- visually unappealing and may affect the value of our home - who will compensate this?
- there are a number of telecommunications towers already in the vicinity, is another really required?
- Why is it not possible to place the facility Sir Donald Bradman Drive end where there is no residential only businesses and airport facing?

I understand we must progress with technology but given there are a number of these facilities already in VERY close vicinity, I question its placement.

I would strongly like to be contacted regarding this matter.

Regards
Alex Marinos (nee Karatolis)
0417815850

Williams, Ben (DPTI)

From: Bethany Nottage <b.nottage@gmail.com>
Sent: Friday, 11 January 2019 6:46 PM
To: DPTI:scapreps
Cc: colton@parliament.sa.gov.au; Development@charlessturt.sa.gov.au; csu@wtcc.sa.gov.au; mayorcoxon@wtcc.sa.gov.au; jwood@wtcc.sa.gov.au; gvlahos@wtcc.sa.gov.au; dhuggett@wtcc.sa.gov.au; Cr Kym McKay; breynolds@wtcc.sa.gov.au; jwoodward@wtcc.sa.gov.au; gnitschke@wtcc.sa.gov.au
Subject: Opposition to Telecommunications Facility 211/L025/18
Attachments: Opposition to Phone Tower Jan 19.docx

Dear Sir/Madam,

Please find attached my opposition to the proposed Telecommunications facility 211/L025/18 proposed at Kooyonga Gold Course, 2 May Terrace, Lockleys SA, 5032 by Visionstream.

I have lived at 448 Henley Beach Road for almost 14 years and think that a 26.2 metre tower at May Terrace will have a huge impact on the suburb and is a risk to the health of my two growing children. My husbands family have been living on the Henley Beach Road for 5 generations and are upset at the proposition of this development in Lockleys.

Please oppose this development for the sake of the residents and our health,

Kind regards,
Bethany Nottage

Applicant: Visionstream
Development Number: 211/L025/18

Bethany Nottage
448 Henley Beach Road
Lockleys SA 5032
0421 641 323

11 January 2019

Development Division
Department of Planning, Transport and Infrastructure
Level 5, 50 Flinders Street
Adelaide SA 5000

By Email: scapreps@sa.gov.au
Cc: colton@parliament.sa.gov.au, Development@charlessturt.sa.gov.au,
csu@wtcc.sa.gov.au, mayorcoxon@wtcc.sa.gov.au, jwood@wtcc.sa.gov.au, jylahos@wtcc.sa.gov.au,
dhuggett@wtcc.sa.gov.au, kmckay@wtcc.sa.gov.au, breynolds@wtcc.sa.gov.au, jwoodward@wtcc.sa.gov.au,
gnitschke@wtcc.sa.gov.au

Dear Sir / Madam

Re: Development Application for new Telecommunications Facility (Visionstream)

Development Number	211/L025/18
Nature of Development	Construction of a telecommunications facility comprising a monopole and associated antennas, 26.2m and cabling and equipment.
Subject Land	2 May Terrace Lockleys, SA, 5032 (Kooyonga Golf Course)
Zone	Community Zone: PA5 (Recreation)

I request the consideration of this submission by the State Commission Assessment Panel, Department of Planning, Transport and Infrastructure and the West Torrens and Charles Sturt Councils and its officers, as relevant, to the assessment of **211/L025/18: Development Application for new Telecommunications Facility (Visionstream)**.

This application has been clearly made with Telstra's preferred outcome in mind. Government representatives and Councillors have a clear obligation to consider the concerns and wellbeing of the many residents who may be impacted. I was notified of this issue by a neighbour yesterday, and living at 448 Henley Beach Road, just down the road from this development, I am disappointed that I was not notified by the responsible body earlier.

This proposal must be rejected on grounds of:

- **Negative Impact on Visual amenity and Diminishing value to property;**
- **Location close to residential premises, and workplaces which are actively occupied;**
- **Concerns regarding Electromagnetic Energy (EME);**
- **Health Concerns – potential for illness or harm.**

The primary objective of the development is noted to *replace the existing Telstra facility to be decommissioned*' and to '*bring an improved and greater range of coverage*.

There are no detailed discussions as to whether this objective is indeed driven or justified by current residents experience or desires (for which this Council must be concerned) only that Telstra has identified a need for a new tower and expected demand for need of service in the targeted coverage area. There is no evidence that enhanced telecommunications services are *essential* to the liveability of the surrounding communities or that the residences and local economies will benefit from improved communications services.

- There is no evidence of a community need, behind a statement that there is an *identified significant demand for coverage*. Only general, nationwide statistics are used in this application.
- The suggestion of a *significant benefit for local residents and businesses* (noted but not evidenced) must be balanced and correlated to a community desire for those services.
- Councillors have an obligation to represent its people, not Telstra's commercial focus and expansion or Kooyonga's potential financial benefit.

There are limited discussions as to why alternative sites are not viable or indeed that they do not exist at all. Why has the Sir Donald Bradman Drive side of the Golf Course not been considered? Why not West Beach, where the hockey fields are?

- Has the applicant has undertaken best practice investigations under the *Telecommunications Code of Practice 1997* (the Code) to ensure the location is suitable?
 - There is no detailed consideration of additional alternative sites, or discussions re avoiding community sensitive locations; minimising exposure to public; availability of land and public utilities; radio interference of the planned service to other services.
 - Rejection of all other options does NOT represent thorough examination of potential telecommunications base-station sites in the surrounding area.

The proposal suggests it will install one (1) monopole and associated antennas with a total height of 26.2 metres.

- The level and effect of **exposure to EME emitted from telecommunications towers** remains subject to debate. The long term impacts of exposure (**including leukaemia, cancer, increased rate of miscarriages etc**) **remains unproven and yet to be fully studied**.
- Alternative locations and possibly alternative levels of EME exposure have not been considered or presented in the application.

The comparative height of current power poles to the towering 26.2 metre telecommunications facility is utterly preposterous.

The site has open and clear frontage to Henley Beach Road and it will clearly be **unsightly and visible to all visitors and locals of the region**. This is a huge visual impact and is degrading the reputation and quality of the beautiful suburb of Lockleys. I have been living on Henley Beach Road for almost 14 years. My husband has been living on Henley Beach Road his whole life, 40 years. It is really upsetting that our children's health is at risk by the erection of the huge 26 metre tower, so close to our home.

Visual impacts of a 26.2m high tower are unacceptable to road users and anyone driving from the city to the beach. There will be no possibility for screening to reinstate the amenity and rural character of the locality and preserve any possible degradation to the value of nearby suburbs.

Under the Commonwealth legislation *Telecommunications Act 1997* which establishes the criteria for 'low impact' telecommunication facilities, the proposed facility is **not low impact** under the definitions as legislated, and therefore Council planning approval is required in the first place.

Council have an obligation to its residents to ensure the retention of surrounding amenity (and property values) and must reject such an unsightly tower, which will have impact. A primary school and child care centre are right across the road.

The council planning scheme includes desired environmental outcomes guiding development.

- **Retention and enhancement** of the residential and architectural style of the towns and suburbs, including scale, intensity built form, visual impacts and environmental impacts. The site proposed is on the main road linking the city to the sea. Henley Beach Road is a major thoroughfare. Standing at a height of 26m, it will be visible from all surrounding perspectives and with slight tree screening; it can have nothing but **maximum negative visual impact**.
 - Even at approximately 5-10m from the road frontage as planned, it is impossible to have a setback from site boundaries so as to ensure that the amenity of adjoining land and the character of the locality are maintained.
 - Landscaping/tree coverage could not provide for anything other than coverage at ground level.
 - It will NOT enhance the surroundings in any way and will be significantly taller than any other nearby natural or built structure and therefore dramatically imposing.
 - The site **will detract from the scenic landscape** of this area and clearly visible from a high use, public (national) road and present a constant visual reminder of the radiation effect that may be possible.
- The proposed facility is **NOT appropriate in its suggested location**.

The *Communications Alliance Limited Mobile Phone Base Station Deployment C564:2011* (the 'Deployment Code') code of practice requires the completion of precautionary approach checklists for site selection, design and site operation and for ARPANSA-format electromagnetic energy (EME) reports to be prepared for all new sites. The tower will emit radio frequencies, causing health concerns.

- The level and effect of **exposure to EME emitted from telecommunications towers** remains subject to debate. The long term impacts of exposure (**including leukaemia, cancer, increased rate of miscarriages etc**) remain unproven and yet to be fully studied. These concerns cannot be dismissed as they relate to feelings and perception, not just science.
- Health Concerns have been discussed in a well-researched submission **opposing CONS16/0018** Material Change of Use for a Telecommunications Facility 357 Beach Road, Ayr, QLD and will not be repeated here.
- Simple internet searches find articles noting that even old studies have revealed health symptoms warranting further exploration – an extract below from an article in 2007¹ reveals concerns about EME levels are not new, nor unfounded.

- The EME Report associated with this site shows the maximum predicted EME levels will equate to 0.23% of the maximum exposure limit under the Australian Standard. A further response to information has upgraded this EME level to 0.36%.

Full article available:

http://www.google.com.au/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwiGnuDX_qzSAhWLa7wKHci0Bt0QFg.ghMAA&url=http%3A%2F%2Fwww.emraustralia.com.au%2F_literature_74859%2FArticle_-Mobile_Phone_Towers%2C_the_price_of_connectivity_-Living_Now_Magazine_Nov_2004&usg=AFQjCNEfxcuNUWzhe3dLCuM3a5gi1wlrMQ

Only a few studies have been conducted specifically on mobile phone antennas themselves. In France, Dr Roger Santini conducted a survey of people living near mobile phone antennas. He found an increased rate of unpleasant symptoms within 300 metres of the antennas. People living within 10m of an antenna experienced symptoms of nausea, loss of appetite, visual disruptions and difficulty in moving. People living within 100m of an antenna experienced symptoms of irritability, depression, concentration problems, memory loss, dizziness and reduced libido. People living 100-200m from an antenna experienced headaches, sleep problems, "feelings of discomfort" and skin problems. People living between 200 and 300m from an antenna experienced a high rate of fatigue.²

A study in Spain produced similar results. Dr Gerd Oberfeld and his team assessed the impact of two GSM antennas on the population of the town of Murcia. They found that exposure resulted in increased reports of fatigue, irritability, headaches, nausea, loss of appetite, sleeping disorders, depression, feelings of discomfort, difficulty in concentration, memory loss, visual disorder, dizziness and cardiovascular problems.³

It is concerning that further upgrades and **increases to exposure levels** may not necessarily be made by application to Council. The council are also aware re proposal **211/L025/18** of the children attending ***Lockleys Primary School*** and ***Precious Cargo*** childcare centre, and how they will be affected by radiation levels.

Has the school and childcare community been consulted in this decision?

This application has the making of being mass produced, without care for the residents impacted. For example, it relies on limited occupancy as defence for limited impact, yet denotes the reason for its build is to increase coverage to increasing demand (implies residencies) in the area;

Councillors must reject this application **211/L025/18**. Council must have regard for the:

- Negative Impact on Visual amenity and Diminishing value to property;**
- Location close to residential premises, and workplaces which are actively occupied;**
- Concerns regarding Electromagnetic Energy (EME);**
- Health Concerns – potential for illness or harm.**

How could you consider a proposal for this application **211/L025/18** across the road from ***Lockleys Primary School*** and the child care centre ***Precious Cargo*** and near so many residents homes?

We request advanced warning as to when this matter will be presented to Councillors (time and date of meeting) to allow the respondent and others to attend in person.

Regards
Bethany Nottage

**South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3**

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Betty Vasiliki Stavrou My phone number: 0412 923 633

Primary method(s) of contact: Email: betty.stavrou@optusnet.com.au
Postal Address: 402 Henley Beach Rd
Lockleys SA Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:** (please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

402 Henley Beach Rd Lockleys SA

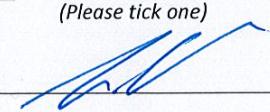
Postcode 5032

- My interests are:** (please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are: 1) the location of the tower is too close to Henley Beach Road; 2) it will not add to the desired character of the area; 3) it will detrimentally impact the amenity of nearby residents; 4) suggest to relocate closer to airport & not on Henley Beach

- I: wish to be heard in support of my submission airport & not on Henley Beach road.
(please tick one) do not wish to be heard in support of my submission (Please tick one)

- By: appearing personally
(please tick one) being represented by the following person Arthur Stavrou

Signature:  Date: 30/12/18



Our Ref: 2018/21042/01

Level 5, 50 Flinders Street
Adelaide SA 5000

GPO Box 1815
Adelaide SA 5001

Telephone: 08 7109 7060
ABN 92 366 288 135

<http://www.saplanningcommission.sa.gov.au/scap>

17 December 2018

B V*STAVROU
402 HENLEY BEACH RD LOCKLEYS SA 5032

Applicant: Visionstream (on behalf of Telstra)
Application Number: 211/L025/18
Proposed Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary

Subject Land: 2 May Terrace, Lockleys (Kooyonga Golf Course)

As an adjoining owner/person potentially affected by the application listed above, your attention is drawn to the attached copy of the notice which is to appear in The Advertiser on 21 December 2018.

The application may be examined during normal business hours at the office of the State Commission Assessment Panel (SCAP), Level 5, 50 Flinders Street, Adelaide and at the office of the West Torrens Council. The application documentation is also available on the SCAP website http://www.saplanningcommission.sa.gov.au/scap/public_notices.

If you wish to comment on the application please complete the attached form. This must reach the Secretary, State Commission Assessment Panel, GPO BOX 1815, Adelaide SA 5001 by no later than **close of business** 11 January 2019.

You may be given an opportunity to appear before the SCAP to further explain your views. You will be contacted should a hearing be arranged.

If you have any questions relating to this matter please contact Benjamin Williams of this office by telephone on 08 7109 7023 or email Ben.Williams2@sa.gov.au.

Yours sincerely,

Ben Williams
On behalf of
STATE COMMISSION ASSESSMENT PANEL

Williams, Ben (DPTI)

From: brenda mcdonough <brenda.mcdonough51@gmail.com>
Sent: Thursday, 10 January 2019 9:54 PM
To: DPTI:scapreps
Subject: 2 May Tce, Lockleys SA 5032 Development No 211/L025/18

My name is Brenda McDonough and I live at 4 Broughton St, Lockleys SA 5032.

My husband and I are totally opposed to the Mobile Tower to be located to the Henley Beach Road boundary, which is about 200-300 metres from our house.

Regards
Brenda and Mark McDonough
4 Broughton St,
Lockleys SA 5032

The Secretary
State Commission Assessment Panel
GPO Box 1815
Adelaide, 5001

RECEIVED 11 JAN 2019

B. Notage
451 Henley Beach Road
Lockleys SA 5032

Dear Sir/Madam,

As a resident of 451 Henley Beach Road, I wish to make it known that I am absolutely opposed to the location of the Proposed Mobile Tower to be installed within the boundary of the Kooyonga Golf Course at the Henley Beach Road boundary end - Development Number: 211/L025/18.

I was only made aware of this proposal yesterday and I ask that the location proposed be rejected.

My greatest concerns are for the health and well being of the Lockleys community and the alteration of the aesthetics of the area that this horrendous tower would have on this old established residential suburb.

This 26.2m tower would have a huge impact on the skyline and in turn adversely effect the residents in the area and the value of the homes would be severely affected by this eyesore.

I suggest there are more appropriate areas not zoned residential where this vulgar tower could be placed and I find this proposal shameful, reprehensible and deplorable with a total lack of understanding of the impact such a structure will have on us as residents.

My grandchildren are 6th generation residents of this beautiful suburb and my wish is for them to continue to live and thrive and contribute to this area and its community but I feel our surrounds are slowly being eroded away by these heinous developments.

I implore you to reconsider the placement of this Mobile Tower in the proposed location for the sake of our children and their children's future and our community in this unique residential zone.

Sincerely . . .

RECEIVED 11 JAN 2019

State Commission Assess. Board
GPO. Box 1915
ADELAIDE. SA 5001

Mrs C. STEVENS
2A Willingate Ave
Lockleys 5032.
2nd January 2019.

I am putting this in writing after having spoken to Benjamin Williams with the express purpose of objecting to the Tower proposed on Kooyonga GOLF COURSE.

I think it absolutely disgusting that you can instal something like this so close to our houses.

I have been living here for 20 years - my grandchildren are often here - and the house will go to them when I pass on.

You have no idea how concerned I am - you don't let people know how much radiation is coming from these installations or if there are any health concerns.

I object strenuously having this Tower placed anywhere near where I live.

Farlen Stevens,

**South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3**

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: CHARLES VINCENT **My phone number:** 0412 207 205

Primary method(s) of contact: Email: charles.vincent@optusnet.com.au
Postal Address: PO Box 500
Address: BROOKLYN PARK Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:** (please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is: 439A HENLEY BEACH RD
LOCKLEYS

Postcode 5032

- My interests are:** (please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are:

Dangerous + Unlikely + Unknown long term effect on residences

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)
- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature: G A Vincent

Date: 11.1.2019

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: charles.vincent@optusnet.com.au

RECEIVED 11 JAN 2019

South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3

Applicant: Visionstream (on behalf of Telstra) RECEIVED 11 JAN 2019
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: MRS. D. M. RUSSIAN My phone number: 0401 498 125

Primary method(s) of contact: Email:
Postal Address: 6 ROSTRATA ST.
Lockleys Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are: (please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

Postcode _____

- My interests are: (please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are: NOT NEAR OUR HOMES.
DANGEROUS HEALTH RISK + RADIATION CLOSER TO US FROM TOWER,
IF YOU BELIEVE THERE IS NO RISK LET SOME OTHERS HAVE IT
NEAR THEIR HOME. WE HAVE CANCER IN OUR FAMILY ALREADY,
I: wish to be heard in support of my submission WHAT WITH WI-FI ETC. WHO NEEDS THIS?
(please tick one)

- do not wish to be heard in support of my submission
(Please tick one)

- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature: D. M. Russian Date: 8 TH JANUARY 2019

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scapreps@sa.gov.au

**442 Henley Beach Road
Lockleys SA 5032**

The Secretary
State Commission Assessment Panel

10 January 2019

By email: scapreps@sa.gov.au

Attention: Mr Benjamin Williams

Dear Sir

Development Number 211/L025/18

As owner and occupier of 442 Henley Beach Road, Lockleys, we wish to record our objection to the above mobile phone tower development to be sited in close proximity to our property.

In our submission the proposal is significantly at odds with a number of relevant principles of development control and therefore should not be approved.

Firstly, we submit that the proposal is inconsistent with the principles of development control in relation to Telecommunications Facilities as identified in the Development Plan for West Torrens (**Development Plan**).

We note that such facilities *should be designed and sited to minimise the visual impact on the character and amenity of the local environment, in particular visually prominent areas, main focal points and significant vistas.*

Noting that the height of the intended structure is 26.2m, the assertion in the Planning Assessment Report (provided by Visionstream) accompanying the Development Application (**PAR**) that the facility is to be set within well-established vegetation is patently inaccurate. The assertion gives the impression that vegetation screening will mask the tower - plainly it will not, in that the tower will be approximately 2-3 times the maximum height of any surrounding vegetation (some of which will presumably be removed to accommodate the tower). We note that no visual representation of the tower by reference to the surrounding vegetation is provided in the PAR, as that would no doubt identify the magnitude of the incompatibility between the tower and its surrounding environment.

We also note from these principles of development control that facilities should *positively contribute to the character of the area*. Siting a 26.2m tower directly opposite a local centre and in immediate proximity to numerous residential premises clearly makes no positive contribution to the character of the area.

Furthermore, the principles of development control identify that telecommunications facilities should be located in residential zones only if sited and designed to minimise visual impact. Whilst located within a Community Zone, the visual impact most directly affects the residential zone opposite and we would submit therefore that considerations relative to a residential zone should apply in the assessment of this application.

Clearly, the tower is not proposed to be located to minimise visual impact and will stand in stark contrast to its surroundings.

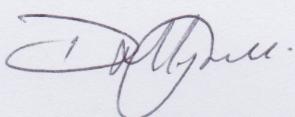
In terms of neighbourhood amenity, it is relevant to also note that the tower will be in the order of 50m from a small local centre, which includes a number of small independent shops and a café. One presumes that Council is cognisant of the likely effect of such a prominent and "out of character" structure on the amenity (and therefore the viability) of this centre - a centre which contributes significantly to the (very desirable) community "feel" of the area and one which, if affected, would not only be detrimental to the traders of that centre, but to the members of the community who enjoy its amenity.

We have also considered the principles of development: control relevant to Recreation Policy Area 5 and note that an Objective (#4) is that a development should *contribute to the desired character of the policy area*. It is difficult to imagine a development which would contribute less, being 2-3 times the maximum height of any surrounding vegetation and fundamentally contrasting to the essential "natural" environment of a golf course.

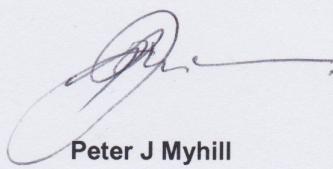
We also note from the PAR that the site is asserted to represent the *best* candidate for the location of a tower. The PAR does not, however, give any basis for this assertion other than by contrast to the limited number of candidates referred to, the majority of the alternatives being rejected by the landowner. In our view this in itself is instructive as, plainly, it must be the view of Kooyonga Golf Club as the land owner that, in most instances, the location of a 26.2m mobile tower is fundamentally anathema to the natural environment of a golf course - and, so it should be considered, in our view, wherever sited within the golf course.

The PAR concludes with a view that the proposed development is generally consistent with all relevant policies of the West Torrens Council Development Plan. It is our submission that the proposed development is, in fact, fundamentally inconsistent with the principles of development control within the Plan and should be rejected.

Yours faithfully



Deborah J Myhill



Peter J Myhill

Williams, Ben (DPTI)

From: fiona.clarke1@internode.on.net
Sent: Friday, 11 January 2019 4:55 PM
To: DPTI:scapreps
Subject: Lockleys Telstra tower

Att: Benjamin Williams

Dear Benjamin

I live closely to the proposed Telstra Tower, on Henley Beach Road.
At the risk of calling me a NIMBY, I can see traffic hazards caused by the construction and maintenance of the proposed tower.
There have already been quite a few accidents on Henley Beach Road, along and near this section.
I realise there might be problems placing it closer to 2 May Terrace (which was a little misleading) and understand if the nearby school does not want it close to them.

Is the Golf Course profiting from this? I really think there could be an alternate site within their boundaries, with safer access.

Please take some consideration about this, I realise there is a need for communications infrastructure.

Thank you for reading this input.

Yours sincerely

Fiona Clarke

**South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3**

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: JASON + LAURA BOOI **My phone number:** 0438 070119.

Primary method(s) of contact: Email: lauracgrillo@gmail.com
Postal Address: 5 Willingale Avenue Postcode: SA 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:** (please tick one) owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

5 Willingale Avenue Lockleys SA Postcode 5032

- My interests are:** (please tick one) I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are: reduce property value + health concerns from radiation being omitted from tower. obstructing view +

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)

- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature: A Booi Date: 9/1/2019

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scapreps@sa.gov.au

South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3

Applicant: Visionstream (on behalf of Telstra) RECEIVED 03 JAN 2019
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: JOSEPH MAMMONE My phone number: 0422 359 449

Primary method(s) of contact: Email: jimammone@hotmail.com.au
Postal Address: U3/ 408 HENLEY BEACH ROAD LOCKLEYS Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:
(please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

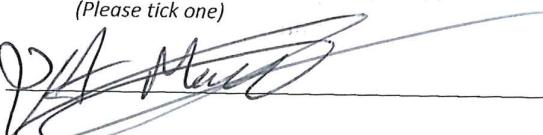
The address of the property affected is:

HENLEY BEACH ROAD LOCKLEYS Postcode U3/ 408 5032.

- My interests are:
(please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are: CONCERNED ON HEALTH IMPACT
IE RADIATION FROM TOWER, THE NEGATIVE IMPACT OF THE TOWER ON THE
AESTHETICS OF THE AREA (SEE ACCOMPANYING COMMENTS NEXT PAGE)

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)
- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature:  Date: 29/12/2018

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scapreps@sa.gov.au

DEVELOPMENT NUMBER - 2111 LO25/18.

DEAR SIR / MADAME

I AM TOTALLY CONCERNED AND VEHMENTLY OPPOSED TO THIS
LARGE AND UNSIGHTLY,
WHICH HAS BEEN PROPOSED TO BE ERECTED ON 2 MAY TERRACE
LOCKLEYS S.A. 5032 KNOWN AS THE KOONYONGA GOLF COURSE
BELLO ARE MY REASONS.

1. I AM EXTREMELY WORRIED ABOUT THE NEGATIVE AND DETRIMENTAL IMPACT ON HEALTH DUE TO THE ELECTROMAGNETIC WAVES AND THE ELECTRICAL CURRENTS EMINATING FROM THESE STRUCTURES INTO THE SURROUNDING ENVIRONMENT AND ITS RESIDENTS ONCE IN OPERATION.
2. THIS STRUCTURE WILL BE AN UNSIGHTLY AND INAPPROPRIATE INTRUSION INTO THE CURRENT NATURAL LANDSCAPE OF THIS HIGHLY VISIBLE AND WELL KNOWN SITE
THE STRUCTURES VISIBILITY COULD ALSO BE A HAZARD TO PASSING MOTORISTS WHO COULD POSSIBLY TAKE THEIR "EYES OF THE ROAD" AND LOSE CONCENTRATION WHILST DRIVING ON THE VERY BUSY HENLEY BEACH ROAD THOROUGHFARE.
3. A VERY CONCERNING THOUGHT WHICH SHOULD KEEP NEARBY RESIDENTS AWAKE AT NIGHT LIKE IT WOULD TO ME IS THAT THIS PROPOSED UNWANTED, UNSIGHTLY AND DANGEROUS PIECE OF INFRASTRUCTURE COULD SET A PRECEDENT FOR FURTHER SUCH TOWERS TO BE BUILT ON THE KOONYONGA GOLF COURSE SITE, WHICH IS CURRENTLY ONE OF THE WORLDS BEST KNOWN GOLF COURSES.
4. SURROUNDING AND NEIGHBOURING LAND VALUATIONS WOULD BE NEGATIVELY IMPACTED DUE TO THIS TOWER
5. AND FINALLY WOULD ANYONE ON THE STATE COMMISSION ASSESSMENT PANEL BE TRULY HAPPY IF ONE OF THESE TOWERS WERE TO BE BUILT NEAR THEIR PROPERTY? IF THE ANSWER IS YES, PLEASE ASK TELSTRA TO BUILD THIS ONE IN YOUR AREA, BUT I DEFINATELY DON'T WANT THIS IN MINE.

THANK YOU.

KIND REGARDS, JOSEPH MCKEE



South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Katherine A. Stavrov

My phone number: 0434313494

Primary method(s) of contact: Email: Kats-stav@hotmail.com

Postal Address: 1 Verdun Street
Bekal Park SA Postcode: 5067

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:
(please tick one)
- owner of local property
 - occupier of local property
 - a representative of a company/other organisation affected by the proposal
 - a private citizen

The address of the property affected is:

2/418 Henley Beach Road, Lockleys

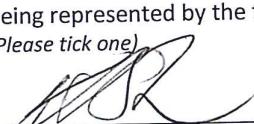
Postcode 5032

- My interests are:
(please tick one)
- I support the development
 - I support the development with some concerns
 - I oppose the development

The specific aspects of the application to which I make comment on are: ① not appropriate to install a tower in such a key area like Lockleys. ② will be very unpleasant to view; an eyesore. ③ will not add value to the area and will affect the value of nearby properties.

- I:
(please tick one)
- wish to be heard in support of my submission
 - do not wish to be heard in support of my submission
(Please tick one)
- By:
(please tick one)
- appearing personally
 - being represented by the following person
(Please tick one)

④ Possibly relocate closer to Sir Donald Bradman Drive in a position where there are less properties.

Signature: 

Date: 8/1/18

Williams, Ben (DPTI)

From: Lisa Adey <lisaadey@hotmail.com>
Sent: Friday, 11 January 2019 2:16 PM
To: DPTI:scapreps
Subject: Representation on Application - Catergory 3 Development number 211/L025/18
Attachments: 20190111_113302.pdf

Hi Benjamin

My name is Lisa Adey from Lockleys. Attached is my opposition to the proposed telephone tower in the North West corner of Kooyonga golf course.

This would be an eye sore on the Lockleys area.

Apparently the tower on the corner of May Tce and Henley Beach road is being decommissioned, surely the tower could be erected across the road on the North East corner. Or even on the side of May Tce and Sir Donald Bradman Dr, where there is an industrial park. There are better options than the one proposed.

I can be contacted on 0417 082 060

Yours Truly
Lisa Adey

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

Adobe, the Adobe logo, Acrobat, the Adobe PDF logo, and Reader are registered trademarks or trademarks of Adobe Systems Incorporated in the United States and other countries.

<http://www.adobe.com/>

South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Lisa Adey My phone number: 0417 082060

Primary method(s) of contact: Email: lisaaadey @ hotmail.com
Postal Address: 9 Willingale Ave Lockleys Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:** (please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

2 MAY TCE LOCKLEYS

Postcode

- My interests are:** (please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are: *The position on the golf course that has been chosen will be an eye sore on the area, can the position of corner of May Tce + Henley Rd be looked at over corner of May Tce + Burbidge Rd.*

I: wish to be heard in support of my submission
 do not wish to be heard in support of my submission
(Please tick one)

By: appearing personally
 being represented by the following person
(Please tick one)

Signature:

Lisaa Adey

Date:

11/11/19

South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
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Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Mary Roumeliotis My phone number: 0408 833 283

Primary method(s) of contact: Email: lpmroum@tpg.com.au
Postal Address: 11A MAY TCE BROOKLYN PARK Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:
(please tick one)
- owner of local property
 - occupier of local property
 - a representative of a company/other organisation affected by the proposal
 - a private citizen

The address of the property affected is:

11A May Tce BROOKLYN PARK Postcode 5032

- My interests are:
(please tick one)
- I support the development
 - I support the development with some concerns
 - I oppose the development

The specific aspects of the application to which I make comment on are:

- ~~Already have one tower on Henley Beach Road (on Cnr Henley Beach and May Tce) in Anglican Church grounds.~~
- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)
- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature: M. Roumeliotis Date: 6/1/2019

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scapreps@sa.gov.au

**South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3**

RECEIVED

28 DEC 2018

State Commission
Assessment Panel

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
Development Type: Merit
Zone / Policy Area: Community Zone (PA 5 Recreation)
Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Melissa Portdesi My phone number: 0420 726 960

Primary method(s) of contact: Email: melissa.portdesi@sa.gov.au
Postal Address: _____ Postcode: _____

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:
(please tick one)
- owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

443 Henley Beach Rd Lockleys

Postcode 5032

- My interests are:
(please tick one)
- I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are:

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)

- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature: M.J. Date: 21/12/18

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scapreps@sa.gov.au

**South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3**

Applicant: Visionstream (on behalf of Telstra)

Development Number: 211/L025/18

Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary

Development Type: Merit

Zone / Policy Area: Community Zone (PA 5 Recreation)

Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)

Contact Officer: Benjamin Williams

Phone Number: 08 7109 7023

Close Date: 5:00 PM 11 January 2019

My Name: RODNEY + SANDRA MARTIN My phone number: 0414 823 423

Primary method(s) of contact: Email: ROD@ERAPUBLICATIONS.COM.AU
Postal Address: Po Box 231 BROOKLYN PARK Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:** (please tick one) owner of local property
 occupier of local property
 a representative of a company/other organisation affected by the proposal
 a private citizen

The address of the property affected is:

7 WILLINGALE AVZ, LOCKLEYS Postcode 5032

- My interests are:** (please tick one) I support the development
 I support the development with some concerns
 I oppose the development

The specific aspects of the application to which I make comment on are:

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)
- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature: Rodney Martin Date: 23-12-2018

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide, SA 5001 / or
Email: scapreps@sa.gov.au

South Australian
DEVELOPMENT ACT, 1993
REPRESENTATION ON APPLICATION – CATEGORY 3

ED 10/1/2019

Applicant: Visionstream (on behalf of Telstra)
Development Number: 211/L025/18
Nature of Development: Construction of a telecommunications facility comprising a monopole and associated antennas with an overall height of 26.2m and associated ancillary cabling and equipment located to the Henley Beach Road boundary
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Subject Land: 2 May Terrace, Lockleys SA 5032 (Kooyonga Golf Course)
Contact Officer: Benjamin Williams
Phone Number: 08 7109 7023
Close Date: 5:00 PM 11 January 2019

My Name: Steve & Kris Smith My phone number: 0413 596 447

Primary method(s) of contact: Email: kris.3@optusnet.com.au
Postal Address: 16 Willingale Ave
Lockleys Postcode: 5032

You may be contacted via your nominated PRIMARY METHOD(s) OF CONTACT if you indicate below that you wish to be heard by the State Commission Assessment Panel in support of your submission.

- My interests are:
(please tick one)
- owner of local property
 - occupier of local property
 - a representative of a company/other organisation affected by the proposal
 - a private citizen

The address of the property affected is:

16 Willingale Ave Lockleys Postcode 5032

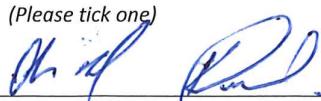
- My interests are:
(please tick one)
- I support the development
 - I support the development with some concerns
 - I oppose the development

The specific aspects of the application to which I make comment on are: Health Aspects, It will be a viewing eye sore at 26m high Devaluation of property.
My opinion is place it in the Airport or behind IKEA use it as a plane beacon for all I care but don't place it where it is going to stick out and be so close to residents homes,

- I: wish to be heard in support of my submission
(please tick one) do not wish to be heard in support of my submission
(Please tick one)

- By: appearing personally
(please tick one) being represented by the following person
(Please tick one)

Signature:



Date: 8/1/19



29 January 2019

Ben Williams
Planning Officer
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5000

Dear Ben,

**RE: Applicant Response to Public Notice Submissions to Development Application 211/L025/18.
2 May Terrace, LOCKLEYS SA 5032**

We refer to your recent email dated 14 January 2019 regarding Telstra's proposal to install a new Telecommunications Facility at 2 MAY TCE LOCKLEYS SA 5032. We have reviewed the 18 representations made as part of Council's public notification process and have provided a written response to each key matter raised at the end of this letter.

Please do not hesitate to contact Stefan Kaldis on Stefan.Kaldis@Visionstream.com.au or 08 8406 0982 should you require any further clarification on this matter.

Kind Regards

A handwritten signature in black ink, appearing to read 'SK'.

Stefan Kaldis
Town Planner
Visionstream Australia



Summary of Representors: SN13089.02 Lockleys Central

Number of Representors in opposition: 17

Number of Representors in support: 1

Location map of Representors in opposition:



Figure 1: Location of all representors in objection to the facility.

Summary of all concerns raised by the community:

1. EME Health Concerns
2. Visual Impact
3. Property values
4. Alternate sites
5. Provides a traffic hazard – for the new entry point along Henley beach road this could be a potential hazard for traffic.
6. Need for the facility



EME & Health

The EME report that is available on the RFNSA site (www.rfnsa.com.au/5032007) has been attached to this letter for your reference, advises that the maximum predicted EME level following the installation of the proposed telecommunication facility located at 2 May Terrace, Lockleys will be 2.23% of the Australian RPS3 safety standard. Previous EME measurement surveys for other areas have shown that actual EME levels are significantly below the predicted levels.

All mobile phone base stations must adhere to strict safety regulations set by the Australian Communications and Media Authority (ACMA). The APRANSA standard mentioned above provides reference levels for the safety of all people, including children. These levels are determined to be safe for 24-hour, 365 days a year exposure.

We rely on the expert advice of international and national health authorities including the World Health Organization (WHO) and the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) for overall assessments of health and safety impacts. The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has issued guidelines on levels of allowable public exposure to Radio Frequency (RF) fields, including guidelines on RF from mobile phones and base stations that Telstra adheres to.

It is Telstra's responsibility to comply with the mandated standard for RF EME set down by ARPANSA, which is the safety standard recommended by the World Health Organisation (WHO). The safety standard works by limiting the network signal to a level low enough to protect all people – including children, pregnant individuals, those with medical illnesses and the elderly – in all environments, 24 hours a day. The safety limit itself is precautionary, in that it has a significant safety margin built into it. All mobile phone base stations such as Wi-Fi devices, panel antennas, omni-rod antennas, all must adhere to strict safety regulations set by the Australian Communications and Media Authority (ACMA).

For further reference on Mobile Phone Base Stations and Health, please find attached relevant Fact Sheet, produced by the Australian Government, Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the Department of Communications.

We hope that the information provided can provide concerned residents with a much greater peace of mind regarding the safety, regulation and operation of radio networks general, and specifically the proposed Telstra Telecommunications Facility.

ARPANSA states that the standards which protect people from EME exposure do not set any distances between mobile base station locations and areas which may be sensitive. ARPANSA highlights that:

'Similarly, the Deployment Code does not specify arbitrary distances at which infrastructure must be sited from community sensitive locations, because arbitrary distances do not necessarily reflect a precautionary approach. In fact, infrastructure sited further from a community sensitive area may need to operate at a higher power and may result in higher EME exposures in that sensitive area. Furthermore, it must be remembered that evidence gathered by ARPANSA confirms that exposure levels in public areas are typically hundreds or thousands of times less than the exposure limit set by the ACMA.'



Visual Impacts

Telstra advises that the location of telecommunications facilities to service urban and suburban communities is nowadays commonplace. We respectfully disagree with this line of argument that the proposal unreasonably impacts the locality of the area.

Nevertheless, Telstra does seriously consider visual impact when siting and designing telecommunications facilities. Given that clear line of sight is integral to the functioning of any telecommunications facility, it is not possible to completely mitigate all impacts on surrounding view sheds. Telstra appreciates that a balance must be struck between amenity and service, without undue compromise to either. Accordingly, we have sought to implement this balance at The Kooyonga Golf Club by choosing a location that best minimises the potential visual impact of all identified candidates investigated and outlined in summary above.

Telstra endeavours to minimise the visual prominence of the facility wherever it is possible to do so. There are restrictions in lowering the height of a telecommunications facility, as the panel antennas must be at a height where there are no obstructions between the antenna and the service area, Telstra has proposed the facility at the minimum height capable of achieving the technical requirements for the site.

Telstra appreciates that the construction of a monopole introduces a new element to the environment, however we maintain it is not unreasonable to propose such infrastructure in a community and residential setting, and that we have sought to minimise the impact of the proposal as best as possible.

It is noteworthy that the ERD Court has continuously ruled it is unavoidable that telecommunications facilities will have a visual impact – the test however is to minimise the impacts via investigating alternative locations, while these ‘alternative’ locations must first be viable from a coverage, access and construction viability perspective. It has been well documented above that candidates investigated originally and following the representations, either do not achieve the necessary radiofrequency objectives, have non-interested land owners or the visual impact at the alternative locations are greater in comparison to the preferred location.

The site has been located to maximise existing vegetation screening of the facility while locating as far as practically possible away from sensitive land uses.

Three (3) photomontages have previously been provided indicating a visual representation of the proposal from within the locality. These vantage points included Henley beach Road (east of the site), Henley beach road (west of the site) and Willingale Road.



Property Value

Some submissions have raised potential impact on property values as grounds for objection. While this concern is not a ground for town planning compliance/assessment it is clearly a consideration for some members of the community.

The issue of property value is an extremely complex one, with fluctuations in price being subject to a vast number of factors – many of which are subjective such as amenity, access to transport, condition of land improvements, views and increasingly the quality /availability telecommunications services. However, often more significant are broader market forces affecting supply and demand for housing.

Unlike a transmission line or power easement, utility installations such as telecommunications facilities do not materially affect the ability of adjoining landowners to develop or enjoy the use of their properties.

It is further noted that since the mid 1990's, there have been thousands of telecommunications facilities developed throughout Australian metropolitan and regional areas. During this period, property values across the board have continued to increase, showing no sign of deterioration as a result of specific factors such as the location of telecommunications base stations. The improvements to mobile network connectivity resulting from improved service coverage is likely to be very significant, which will in turn support business, health, education and a range of other sectors.

Notwithstanding, Telstra is not aware of any credible evidence that directly links the siting of a telecommunications facility to either an increase or a decrease in property prices.

Alternative Sites

The Development Application identified five (5) alternative candidate locations investigated as part of the site selection process before determining that the proposed location is the only practicable and viable option available to meet the need for the service.

In summary, of the five candidates, four (4) of the candidates had the same land owner, being at The Kooyonga Golf Club (2 May Terrace, Lockleys) were not interested in any of the alternate candidates, being candidates C1, C2, C4. Additionally, Candidate C4, which was located on the Sir Donald Bradman Drive, was too far south and outside the coverage area, failing to meet the radiofrequency (RF) requirements. The other candidate (candidate A) failed to meet the structural design with the available space on the rooftop.

Possible locations where raised within the representations which included locations along Sir Donald Bradman drive and the Ikea Car park. These locations are both too far south of the targeted coverage area and did not meet the RF requirements for the area, this was reflected as option C4 (located on Sir Donald Bradman Drive) did not meet the coverage requirements.



The preferred location (the subject of the development application), including the above-mentioned design changes, seeks to balance that potential visual impacts as much as technically feasible while maintaining the necessary coverage objectives necessitating the development. The proposed location is considered a satisfactory balance of these requirements. In particular, the development site is already located as far as practically possible from more sensitive land uses, will be very well screened by existing tall trees on the subject site and the structure will be as small as practically necessary.

RF Need for the Facility

The primary objective of the facility is to replace coverage from existing Brooklyn Park West site and expand coverage to surrounding areas. The facility will also extend the coverage of the original facility and bring enhanced performance to the target area. The performance objectives include strengthening and preventing: depth of coverage, interference, dropouts, and future expansion/technology.

Telstra works diligently to find a balance between providing high quality services and minimising our impact on the community and the local environment. In addition to technical requirements, Telstra has taken into account a number of other important non-technical criteria when selecting the site, including the potential to co-locate at an existing telecommunications facility; the potential to locate on an existing building or structure; the minimisation of EME from the facility, the visual impact on the surrounding area and the need to obtain relevant town planning approvals; the proximity to community-sensitive locations and areas of environmental heritage or significance; and the type of and ability to secure tenure at the site. The tower height is to ensure the optimum coverage for the area, being what is required to service the target coverage area. Additionally, with the surrounding area consisting of substantial vegetation the antennas must be able to service the area without interference or disturbance.



VISIONSTREAM 

Photo Montage examples



Figure 1: View of the facility from Corner of Henley Beach Road/Broughton Street



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Figure 2: View of the facility from the corner of Henley Beach Road/Torrens Ave



Figure 3: View towards proposal on Willingale Avenue



Figure 4: Locations of proposed facility and locations of each photo

These photomontages have been prepared by a third party (Mackinlay Mackenzie) for the use of Visionstream Australia Pty Ltd, on behalf of Telstra Corporation Ltd as supporting information with respect to a proposed Telecommunications Facility to be located at 2 May Terrace Lockleys. The information provided within this report has been prepared by Mr. Thomas Mackenzie of Mackinlay Mackenzie with support and imagery provided by Visionstream Australia Pty Ltd.

The resulting montages are considered to be artist impression only and may not fully represent the final product or views. Notwithstanding, the images have been presented to show as accurately as possible the proposal.

The images contained within the photomontage were taken by Mr. Stefan Kaldis of Visionstream Australia Pty Ltd. The images were collected on Monday 21st of January 2019 and have sought to locate a nominal area where the site could potentially be viewed.

Figure one is located approximately 120m north east of the proposed facility. Figure two is located approximately 80 north west of the proposed facility. Figure three is taken approximately 220m south west from Willingale avenue, displaying how the facility will be hidden from site (proposed facility indicated by the red arrow).



Character and Zoning

The facility is located within the *Community zone; Recreation policy Area 5; Precinct 8 open space*. The proposal is not considered to be non-complying development within the zone, and it is the opinion of Telstra that the facility is not seriously at variance with the development plan and objectives and character of the zone. Objectives 1 & 2 state “a zone accommodating community, educational, recreational and health care facilities for the general public’s benefit” and “development that is integrated in function and provides a co-ordinated base to promote efficient service delivery”. Hence the facility will allow appropriate efficiency within the area and add public benefit from replacing the existing facility and enhancing that service. With the growing need for users of the Telstra network and the introduction of advancing technology, the proposal not only will ensure the ongoing coverage in the area but will also strengthen network access for future use. Additionally, this uninterrupted coverage for the present and future is an essential need for the community especially regarding work, education and safety. The proposed facility introducing the ability for enhanced and uninterrupted coverage adds substantial social, economic and personal benefits to the community within the locality, such as:

- Providing the opportunity to work and study from home;
- Ensure the accessibility of uninterrupted coverage for phone and internet for local business.
- Ensure access to phone services at all times especially for emergencies; and
- Providing greater accessibility to the internet for young people, particularly for educational purposes.

Traffic Hazards

Within the representations there were concerns raised in regards to the monopole being a distraction to drivers on Henley beach road, and that the new crossover and entry point could possibly provide a traffic hazard.

In regard to the monopole being a distraction to drivers, we respectfully disagree with this line of argument. It is common place for monopoles to be located within proximity to roads such as Henley Beach Road, in saying this, the facility is set back from the road front and does not impact upon the road reserve. Additionally, with there being a number a vertical structure along the road reserve, the monopole does not unreasonably impact on the surrounding environment. In particular, when viewed from along Henley Beach Road.

While the access route will be utilised approximately 3-4 times annually for maintenance purposes, the crossover will not be subject to significant traffic generation. The entry point and driveway has also been designed for vehicles to enter and exit in a forward direction, to ensure safe access to and from the facility.

Design and Appearance

OBJECTIVES

- 1 Development of a high **design** standard and appearance that responds to and reinforces positive aspects of the local environment and built form.
- 2 Roads, open spaces, paths, buildings and land uses laid out and linked so that they are easy to understand and navigate.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Buildings should reflect the desired character of the locality while incorporating contemporary designs that have regard to the following:
 - (a) building height, mass and proportion
 - (b) external materials, patterns, colours and decorative elements
 - (c) roof form and pitch
 - (d) façade articulation and detailing
 - (e) verandas, eaves, parapets and window screens.
- 2 The external walls and roofs of buildings should not incorporate highly reflective materials which will result in glare to neighbouring properties or drivers.
- 3 Where a building is sited on or close to a side boundary, the side boundary wall should be sited and limited in length and height to minimise:
 - (a) the visual impact of the building as viewed from adjoining properties
 - (b) overshadowing of adjoining properties and allow adequate sun light to neighbouring buildings.
- 4 Structures located on the roofs of buildings to house plant and equipment should be screened from view and should form an integral part of the building design in relation to external finishes, shaping and colours.
- 5 Balconies should:
 - (a) be integrated with the overall form and detail of the building
 - (b) include balustrade detailing that enables line of sight to the street
 - (c) be recessed where wind would otherwise make the space unusable
 - (d) be self-draining and plumbed to minimise runoff.
- 6 Transportable buildings and buildings which are elevated on stumps, posts, piers, columns or the like, should have their suspended footings enclosed around the perimeter of the building, and the use of verandas, pergolas and other suitable architectural detailing to give the appearance of a permanent structure.

Development Adjacent Heritage Places

- 7 The design of multi-storey buildings should not detract from the form and materials of adjacent State and local heritage places listed in [Table WeTo/5 – State Heritage Places](#) or in [Table WeTo/4 – Local Heritage Places](#).
- 8 Development on land adjacent to a State or local heritage place, as listed in [Table WeTo/5 – State Heritage Places](#) or in [Table WeTo/4 – Local Heritage Places](#), should be sited and designed to reinforce the historic character of the place and maintain its visual prominence.

Overshadowing

- 9 The design and location of buildings should enable direct winter sunlight into adjacent dwellings and private open space and minimise the overshadowing of:
 - (a) windows of main internal living areas
 - (b) ground-level private open space
 - (c) upper-level private balconies that provide the primary open space area for a dwelling
 - (d) solar collectors (such as solar hot water systems and photovoltaic cells).

Visual Privacy

- 10 Development should minimise direct overlooking of the habitable rooms and private open spaces of dwellings through measures such as:
 - (a) appropriate site layout and building orientation
 - (b) off-setting the location of balconies and windows of habitable rooms with those of other buildings so that views are oblique rather than direct to avoid direct line of sight
 - (c) building setbacks from boundaries (including building boundary to boundary where appropriate) that interrupt views or that provide a spatial separation between balconies or windows of habitable rooms
 - (d) screening devices (including fencing, obscure glazing, screens, external ventilation blinds, window hoods and shutters) that are integrated into the building design and have minimal negative effect on residents' or neighbours' amenity.
- 11 Permanently fixed external screening devices should be designed and coloured to complement the associated building's external materials and finishes.

Relationship to the Street and Public Realm

- 12 Buildings (other than ancillary buildings, group dwellings or buildings on allotments with a battle axe configuration) should be designed so that the main façade faces the primary street frontage of the land on which they are situated.
- 13 Buildings, landscaping, paving and signage should have a co-ordinated appearance that maintains and enhances the visual attractiveness of the locality.
- 14 Buildings should be designed and sited to avoid extensive areas of uninterrupted walling facing areas exposed to public view.
- 15 Building design should emphasise pedestrian entry points to provide perceptible and direct access from public street frontages and vehicle parking areas.

- 16 In mixed use and medium and high density residential areas, development facing the street should be designed to provide interesting and pedestrian friendly street frontages by:
 - (a) including features such as frequent doors and display windows, retail shopfronts and/or outdoor eating or dining areas
 - (b) minimising the frontage for fire escapes, service doors, plant and equipment hatches
 - (c) avoiding undercroft, semi-basement or ground floor vehicle parking that is visible from the primary street frontage
 - (d) using colour, vertical and horizontal elements, roof overhangs and other design techniques to provide visual interest and reduce massing
 - (e) including awnings, eaves, verandahs or similar, to the street where setbacks and ground floor uses allow.
- 17 Where zero or minor setbacks are desirable, development should incorporate shelter over footpaths to enhance the quality of the pedestrian environment.
- 18 Multi level vehicle parking areas within buildings should be designed, sited and screened from public view by an appropriate combination of built form, landscaping and/or visual art while still allowing for natural ventilation within these structures.

Outdoor Storage and Service Areas

- 19 Outdoor storage, loading and service areas should be:
 - (a) screened from public view by a combination of built form, solid fencing and/or landscaping
 - (b) conveniently located and designed to enable the manoeuvring of service and delivery vehicles
 - (c) sited away from sensitive land uses.

Building Setbacks from Road Boundaries

- 20 Except in areas where a new character is desired, the setback of buildings from public roads should:
 - (a) be similar to, or compatible with, setbacks of buildings on adjoining land and other buildings in the locality
 - (b) contribute positively to the function, appearance and/or desired character of the locality.
- 21 Except where specified in a particular zone, policy area or precinct, the main face of a building should be set back from the primary road frontage in accordance with the following table:

Setback difference between buildings on adjacent allotments	Setback of new building
Up to 2 metres	The same setback as one of the adjacent buildings, as illustrated below:
	<p>When $b - a \leq 2$, setback of new dwelling = a or b</p>

- 22 Except in areas where a new character is desired or where specified in a zone, policy area or precinct, the setback of development from a secondary street frontage should reflect the setbacks of the adjoining buildings and other buildings in the locality.
- 23 All setbacks from the road frontage should be additional to the road widening setback established under the *Metropolitan Adelaide Road Widening Plan Act 1972*.

Building Setback from River Torrens

- 24 Buildings and structures should be set back a minimum of 8 metres from the boundary of the **Open Space Zone** plus an additional 1 metre for every metre of vertical wall height above 5 metres.
- 25 Development should not impair, disfigure, interfere with or detrimentally affect the amenity, aesthetic appearance or scenic beauty of:
 - (a) the River Torrens
 - (b) land within 60 metres of either side of the River Torrens
 - (c) the landscape visible from the River Torrens.

Infrastructure

OBJECTIVES

- 1 Infrastructure provided in an economical and environmentally sensitive manner.
- 2 The visual impact of infrastructure facilities minimised.
- 3 The efficient and cost-effective use of existing infrastructure.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should only occur where it has access to adequate utilities and services, including:
 - (a) electricity supply
 - (b) water supply
 - (c) drainage and stormwater systems
 - (d) garbage disposal and recycling collection
 - (e) effluent disposal systems
 - (f) formed all-weather public roads
 - (g) telecommunications services
 - (h) gas services.
- 2 Development should incorporate any relevant and appropriate social infrastructure, community services and facilities.
- 3 Development should only occur where it provides, or has access to, relevant easements for the supply of infrastructure.
- 4 Development should incorporate provision for the supply of infrastructure services to be located within common service trenches where practicable.
- 5 Development should not occur until adequate and coordinated drainage of the land is provided.
- 6 Development in urban areas should not occur without provision of an adequate reticulated domestic quality mains water supply and an appropriate waste treatment system.
- 7 In areas where no reticulated water supply is available, buildings whose usage is reliant on a water supply should be equipped with an adequate and reliable on-site water storage system.
- 8 Urban development should have a direct water supply.
- 9 Electricity infrastructure should be designed and located to minimise visual and environmental impacts.
- 10 Utilities and services, including access roads and tracks, should be sited on areas already cleared of native vegetation. If this is not possible, their siting should cause minimal interference or disturbance to existing native vegetation and biodiversity.

- 11 Utility buildings and structures should be grouped with non-residential development where possible.
- 12 Development in proximity to infrastructure facilities should be sited and be of a scale to ensure adequate separation to protect people and property.
- 13 Incompatible uses should not encroach upon the easements of infrastructure corridors for existing and proposed transmission lines.
- 14 In urban areas, electricity supply (except transmission lines) serving new development should be installed underground, excluding lines having a capacity greater than or equal to 33kV.
- 15 Provision should be made for new transmission and distribution substations and overhead major electricity line corridors (having a capacity greater than or equal to 33kV) in areas which have the required buffer distance to protect people and allow for adequate access.
- 16 Land division for the purpose of residential and other sensitive land uses should not occur within electricity line corridors or existing electricity easements unless the resultant allotments are large enough to enable accommodation of safe clearances and expected structures.

Interface between Land Uses

OBJECTIVES

- 1 Development located and designed to minimise adverse impact and conflict between land uses.
- 2 Protect community health and amenity from adverse impacts of development.
- 3 Protect desired land uses from the encroachment of incompatible development.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should not detrimentally affect the amenity of the locality or cause unreasonable interference through any of the following:
 - (a) the emission of effluent, odour, smoke, fumes, dust or other airborne pollutants
 - (b) noise
 - (c) vibration
 - (d) electrical interference
 - (e) light spill
 - (f) glare
 - (g) hours of operation
 - (h) traffic impacts.
- 2 Development should be sited and designed to minimise negative impacts on existing and potential future land uses desired in the locality.
- 3 Development adjacent to a **Residential Zone** should be designed to minimise overlooking and overshadowing of nearby residential properties.
- 4 Residential development adjacent to non-residential zones and land uses should be located, designed and/or sited to protect residents from potential adverse impacts from non-residential activities.
- 5 Sensitive uses likely to conflict with the continuation of lawfully existing developments and land uses desired for the zone should be designed to minimise negative impacts.
- 6 Non-residential development on land abutting a residential zone should be designed to minimise noise impacts to achieve adequate levels of compatibility between existing and proposed uses.
- 7 Non-residential buildings and structures in zones other than the **Urban Corridor Zone** should be set back from boundaries of the site where its abuts the **Residential Zone**:
 - (a) a minimum of 5 metres from the front property boundary
 - (b) a minimum of 3 metres from side or rear property boundaries where the vertical wall height (from natural ground level) is 4 metres or less, plus an additional 0.6 metres for every metre that the vertical wall height (from natural ground level) exceeds 4 metres.

Noise Generating Activities

- 8 Development that emits noise (other than music noise) should include noise attenuation measures that achieve the relevant *Environment Protection (Noise) Policy* criteria when assessed at the nearest existing noise sensitive premises.
- 9 Development with the potential to emit significant noise (e.g. industry) should incorporate noise attenuation measures that prevent noise from causing unreasonable interference with the amenity of noise sensitive premises.
- 10 Outdoor areas (such as beer gardens or dining areas) associated with licensed premises should be designed or sited to minimise adverse noise impacts on adjacent existing or future noise sensitive development.
- 11 Development proposing music should include noise attenuation measures that achieve the following desired noise levels:

Noise level assessment location	Desired noise level
Adjacent existing <i>noise sensitive development</i> property boundary	<p>Less than 8 dB above the level of background noise ($L_{90,15\text{min}}$) in any octave band of the sound spectrum</p> <p>and</p> <p>Less than 5 dB(A) above the level of background noise ($LA_{90,15\text{min}}$) for the overall (sum of all octave bands) A-weighted level</p>
Adjacent <i>land</i> property boundary	<p>Less than 65dB(Lin) at 63Hz and 70dB(Lin) in all other octave bands of the sound spectrum</p> <p>or</p> <p>Less than 8 dB above the level of background noise ($L_{90,15\text{min}}$) in any octave band of the sound spectrum and 5 dB(A) overall (sum of all octave bands) A-weighted level</p>

Air Quality

- 12 Development with the potential to emit harmful or nuisance-generating air pollution (including gaseous odours) should incorporate air pollution control measures to prevent harm to human health or unreasonable interference with the amenity of sensitive uses within the locality.
- 13 Chimneys or exhaust flues associated with commercial development (including cafes, restaurants and fast food outlets) should be designed to ensure they do not cause a nuisance or health concerns to nearby sensitive land uses by:
 - (a) incorporating appropriate treatment technology before exhaust emissions are released to the atmosphere
 - (b) ensuring that the location and design of chimneys or exhaust flues maximises dispersion and takes into account the location of nearby sensitive uses.

Orderly and Sustainable Development

OBJECTIVES

- 1 Orderly and economical development that creates a safe, convenient and pleasant environment in which to live.
- 2 Development occurring in an orderly sequence and in a compact form to enable the efficient provision of public services and facilities.
- 3 Development that does not jeopardise the continuance of adjoining authorised land uses.
- 4 Development that does not prejudice the achievement of the provisions of the Development Plan.
- 5 Urban development located only in zones designated for such development.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should not prejudice the development of a zone for its intended purpose.
- 2 Land outside of townships and settlements should primarily be used for primary production and conservation purposes.
- 3 Urban development should form a compact extension to an existing built-up area.
- 4 Ribbon development should not occur along the coast, water frontages or arterial roads shown in *Overlay Maps - Transport*.
- 5 Development should be located and staged to achieve the economical provision of public services and infrastructure, and to maximise the use of existing services and infrastructure.
- 6 Where development is expected to impact upon the existing infrastructure network (including the transport network), development should demonstrate how the undue effect will be addressed.
- 7 Vacant or under utilised land should be developed in an efficient and co-ordinated manner to not prejudice the orderly development of adjacent land.
- 8 Development should be undertaken in accordance with the following concept plan maps:
 - (a) [Concept Plan Map WeTo/1 - Mile End South Bulky Goods Zone](#)
 - (b) [Concept Plan Map WeTo/2 - Prominent Development Sites](#)
 - (c) [Concept Plan Map WeTo/3a - Sir Donald Bradman Drive & Marion Road Intersection Commercial](#)
 - (d) [Concept Plan Map WeTo/3b - Marion Road & Richmond Road Intersection Commercial](#)
 - (e) [Concept Plan Map WeTo/3c - Richmond Road & South Road Intersection Commercial](#)
 - (f) [Concept Plan Map WeTo/4a - Richmond Road \(Marleston\) Commercial](#)
 - (g) [Concept Plan Map WeTo/4b - Richmond Road \(Richmond\) Commercial](#)
 - (h) [Concept Plan Map WeTo/4c - Richmond Road \(Keswick/Mile End South\) Commercial](#)

- (i) [Concept Plan Map WeTo/5 - Sir Donald Bradman Drive \(Mile End\) Commercial](#)
- (j) [Concept Plan Map WeTo/6 - South Road \(Keswick\) Commercial](#)
- (k) [Concept Plan Map WeTo/7 - South Road \(Mile End\) Commercial](#)
- (l) [Concept Plan Map WeTo/8 - South Road \(Mile End South\) Commercial](#)
- (m) [Concept Plan Map WeTo/9 - Office Park Commercial](#)
- (n) [Concept Plan Map WeTo/10 - Mile End Recreation](#)
- (o) [Concept Plan Map WeTo/11 - Mile End South Recreation](#)
- (p) [Concept Plan Map WeTo/12 - Adelaide Shores](#)
- (q) [Concept Plan Map WeTo/13 - Brickworks District Centre](#)
- (r) [Concept Plan Map WeTo/14 - Kurralta Park District Centre](#)
- (s) [Concept Plan Map WeTo/15 - Former Apollo Stadium Industry](#)
- (t) [Concept Plan Map WeTo/16 - North Plympton/Camden Park Industry](#)
- (u) [Concept Plan Map WeTo/17 - Novar Gardens Industry](#)
- (v) [Concept Plan Map WeTo/18 - Netley Industry](#)
- (w) [Concept Plan Map WeTo/19 - Hilton Neighbourhood Centre](#)
- (x) [Concept Plan Map WeTo/20 - Marleston Neighbourhood Centre](#)
- (y) [Concept Plan Map WeTo/21 - Novar Gardens Neighbourhood Centre](#)
- (z) [Concept Plan Map WeTo/22 - Richmond Neighbourhood Centre](#)
- (aa) [Concept Plan Map WeTo/23 - Tennyson Street Neighbourhood Centre](#)
- (bb) [Concept Plan Map WeTo/24 - Residential Promenade](#)
- (cc) [Concept Plan Map WeTo/25 - Underdale Urban Renewal.](#)

Siting and Visibility

OBJECTIVES

- 1 Protection of scenically attractive areas, particularly natural coastal landscapes.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should be sited and designed to minimise its visual impact on:
 - (a) the natural, rural or heritage character of the area
 - (b) areas of high visual or scenic value, particularly and coastal areas
 - (c) views from the coast, near-shore waters, public reserves, tourist routes and walking trails
 - (d) the amenity of public beaches.
- 2 Buildings should be sited in unobtrusive locations and, in particular, should:
 - (a) be grouped together
 - (b) where possible be located in such a way as to be screened by existing vegetation when viewed from public roads.
- 3 Buildings outside of urban areas and in undulating landscapes should be sited in unobtrusive locations and in particular should be:
 - (a) sited below the ridgeline
 - (b) sited within valleys or behind spurs
 - (c) sited in such a way as to not be visible against the skyline when viewed from public roads
 - (d) set well back from public roads, particularly when the allotment is on the high side of the road.
- 4 Buildings and structures should be designed to minimise their visual impact in the landscape, in particular:
 - (a) the profile of buildings should be low and the roof lines should complement the natural form of the land
 - (b) the mass of buildings should be minimised by variations in wall and roof lines and by floor plans which complement the contours of the land
 - (c) large eaves, verandas and pergolas should be incorporated into designs so as to create shadowed areas that reduce the bulky appearance of buildings.
- 5 The nature of external surface materials of buildings should not detract from the visual character and amenity of the landscape.
- 6 The number of buildings and structures on land outside of urban areas should be limited to that necessary for the efficient management of the land.

- 7 Driveways and access tracks should be designed and surfaced to blend sympathetically with the landscape and to minimise interference with natural vegetation and landforms.
- 8 Development should be screened through the establishment of landscaping using locally indigenous plant species:
 - (a) around buildings and earthworks to provide a visual screen as well as shade in summer, and protection from prevailing winds
 - (b) along allotment boundaries to provide permanent screening of buildings and structures when viewed from adjoining properties and public roads
 - (c) along the verges of new roads and access tracks to provide screening and minimise erosion.

Telecommunications Facilities

OBJECTIVES

- 1 Telecommunications facilities provided to deliver communication services to the community.
- 2 Telecommunications facilities sited and designed to minimise visual impact on the amenity of the local environment.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Telecommunications facilities should:
 - (a) be located in a co-ordinated manner to deliver communication services efficiently
 - (b) use materials and finishes that minimise visual impact
 - (c) have antennae located as close as practical to the support structure
 - (d) be located primarily in industrial, commercial, business, office, centre and rural zones
 - (e) where technically feasible, be co-located with other telecommunications facilities
 - (f) incorporate landscaping to screen the development, particularly equipment shelters and huts
 - (g) be designed and sited to minimise the visual impact on the character and amenity of the local environment, in particular visually prominent areas, main focal points and significant vistas.
- 2 Telecommunications facilities in areas of high visitation and community use should use innovative design techniques (eg sculpture and other artworks) where possible and where the resulting design would positively contribute to the character of the area.
- 3 Telecommunications facilities should be located in residential zones only if sited and designed to minimise visual impact by:
 - (a) using existing buildings and vegetation for screening
 - (b) incorporating the facility within an existing structure that may serve another purpose
 - (c) taking into account the size, scale, context and characteristics of existing structures, landforms and vegetation so as to complement the local environment.
- 4 Telecommunications facilities should not have a direct or significant effect on the amenity, character and settings of Historic Conservation Areas, local heritage places, State heritage places or State Heritage Areas.

Community Zone

Refer to the [Map Reference Tables](#) for a list of the maps that relate to this zone.

OBJECTIVES

- 1 A zone accommodating community, educational, recreational and health care facilities for the general public's benefit.
- 2 Development that is integrated in function and provides a co-ordinated base to promote efficient service delivery.
- 3 Development that contributes to the desired character of the zone.

PRINCIPLES OF DEVELOPMENT CONTROL

Land Use

- 1 The following forms of development are envisaged in the zone:
 - cemetery
 - community centre
 - consulting room
 - educational establishment
 - emergency services facility
 - hall
 - health facility
 - hospital
 - library
 - office associated with community service
 - place of worship
 - public administration office
 - recreation centre
 - theatre
 - welfare institution.
- 2 Development listed as non-complying is generally inappropriate.
- 3 Development should not be undertaken if it would inhibit or prejudice the integrated development of land within the zone for further community and institutional uses.

Recreation Policy Area 5

Refer to the [Map Reference Tables](#) for a list of the maps that relate to this policy area.

OBJECTIVES

- 1 A policy area accommodating sporting, entertainment, cultural and recreational activities and associated spectator and administrative facilities.
- 2 Development of integrated recreational areas and facilities that accommodate a range of activities accessible to the community.
- 3 Buildings, facilities and car parks located and designed to blend in with existing or additional trees, vegetation and landscaping.
- 4 Development that contributes to the desired character of the policy area.

DESIRED CHARACTER

This policy area will accommodate a variety of sporting, entertainment, cultural and recreational activities and associated spectator and administrative facilities.

Precinct 7 Mile End

The section of the precinct north of Hilton Bridge, Sir Donald Bradman Drive is located in a highly visible position. Development will achieve a visual integration of all elements and uses in this section, in keeping with the city edge location. This part of the precinct accommodates an athletics complex which consists of club rooms, administrative facilities, training rooms, gym facilities, kiosk, officials rooms, lighting and terraced viewing areas. A range of other active recreation and ancillary uses are also appropriate and opportunity for passive recreation, integrated pedestrian access, bikeways and public transport is available. Areas for passive recreation will be available for shared use, being accessible to the public when not being used for athletics.

The design of development will be of a high quality. The form, scale and materials of the built form will visually integrate the uses for the site with existing features and the nearby park lands. The design will also enable future improvement of the athletics stadium and facilitate safe pedestrian and cycle links to the athletics stadium, and adjacent areas.

Ancillary commercial development and shops associated with the operation of the stadium will be incorporated into the overall design theme for the precinct.

That part of the policy area south of Hilton Bridge, Sir Donald Bradman Drive, will accommodate sporting and recreation facilities focused on netball and associated activities. Development will rehabilitate this area and achieve visual integration of all elements and uses on the site in keeping with the city edge location. A range of other active recreation and ancillary uses are also appropriate and opportunity for passive recreation, integrated pedestrian access, bikeways and public transport is available.

Lighting should be focused as far as possible on the stadium and should minimise light spill to adjoining residential areas.

Landscaping should be provided along the western perimeter of the site to form a buffer between the recreation area and the new arterial road.

Car parking and access areas should be co-ordinated with development within the section located to the north of the site to optimise layout and opportunities for shared use.

Precinct 8 Open Space

This precinct will accommodate private recreation land and open space for a range of active and passive recreational land uses. This precinct envisages the continued development of the existing golf courses for active recreation as international and national championship private courses with associated ancillary facilities. Horses often access the site.

Development will be of a high architectural standard, designed and landscaped to enhance the amenity of the locality.

Internal roadways, driveways and paths, other than for private golf course pathways, should be sealed in bitumen, concrete or similar impervious materials.

PRINCIPLES OF DEVELOPMENT CONTROL

Land Use

- 1 The following forms of development are envisaged in the policy area:
 - car parking
 - clubroom associated with a sports facility
 - community centre
 - community hall
 - entertainment, cultural and exhibition facility
 - golf course
 - indoor and outdoor recreation facility
 - lighting for night use of facilities
 - meeting hall
 - office associated with community or recreation facility
 - playground
 - shops or groups of shops ancillary to recreation development
 - showground
 - sports ground and associated facility
 - special event
 - spectator and administrative facilities ancillary to recreation development
 - swimming pool.
- 2 A shop or group of shops should only be developed where:
 - (a) it is ancillary to recreation and sport development
 - (b) the total gross leasable area is 250 square metres or less.

Form and Character

- 3 Development should not be undertaken unless it is consistent with the desired character for the policy area.
- 4 Strong thematic landscaping should be planted and maintained on individual sites to improve the amenity of the area, provide shade and shelter, create interest, provide habitat, retain existing native vegetation, use locally indigenous plant species in plantings where possible and define different activity areas.
- 5 All car parking areas should be shaded and screened with vegetation to improve the amenity of the zone.

Land Division

- 6 Land division or the rearrangement of existing allotment boundaries should take place as part of a co-ordinated development scheme, or as a rationalisation of land holdings that is designed to allow more efficient and economic use of land consistent with the objectives of the zone.

PRECINCT SPECIFIC PROVISIONS

Refer to the [Map Reference Tables](#) for a list of the maps that relate to the following precincts.

Precinct 7 Mile End

- 7 The following forms of development are envisaged specifically within the precinct:
- sports facility
 - small scale commercial activity associated with the sports facility
 - small scale retail activity associated with the sports facility.
- 8 Development should not be undertaken unless it is consistent with the desired character for the precinct.
- 9 Development should occur in accordance with [Concept Plan Map WeTo/10 - Mile End Recreation](#) and in particular:
- (a) should be developed with recreation facilities focused on athletics, with areas for passive recreation available for shared use, being accessible to the public when not being used for athletics
 - (b) the athletics complex should consist of club rooms, administration facilities, training rooms, gym facilities, kiosk, officials rooms, lighting and terraced viewing areas
 - (c) should provide integrated pedestrian access and bikeways to the athletics stadium, public transport and adjacent areas
 - (d) should provide off street parking for visitor, employee and services vehicles at the rate of one car parking space per 2.7 persons
 - (e) should incorporate commercial and retail development associated with the operation of the stadium
 - (f) the combined total floor area for retail development should not exceed 250 square metres.
- 10 Development should occur in accordance with [Concept Plan Map WeTo/11 - Mile End South Recreation](#) and in particular should:
- (a) be developed for indoor and outdoor netball facilities and associated sporting and recreation uses
 - (b) provide sufficient car parking for visitor, employee and service vehicles at the rate of one car parking space per 3.4 persons
 - (c) incorporate landscaping on the western perimeter of the site.
- 11 Development should be of a form, scale and constructed of materials to visually integrate development with existing features and the nearby Adelaide Park Lands.
- 12 The athletics stadium to the north of Hilton Bridge, and the netball facility to the south of Hilton Bridge should form high quality cohesive design elements at the entry to the City of Adelaide.
- 13 Stormwater drainage swales and detention areas should be designed to facilitate multiple use.

Precinct 8 Open Space

- 14 The following forms of development are envisaged specifically in the precinct:
- sports facility
 - small scale commercial activity associated with the sports facility

- car park
- club room associated with a golf club
- golf course
- shop or group of shops ancillary to a golf club.

Form and Character

15 Development should not be undertaken unless it is consistent with the desired character for the precinct.

PROCEDURAL MATTERS

Complying Development

Complying developments are prescribed in Schedule 4 of the *Development Regulations 2008*.

In addition, the following forms of development are designated as complying subject to the conditions contained in [Table WeTo/1 - Conditions for Complying Development](#):

- recreation area within **Precinct 8 Open Space**.

Non-complying Development

Development (including combinations thereof, or more than one of a particular kind, alterations, extensions and/or additions to existing buildings or structures building work, a change in the use of land, or division of an allotment) for the following is non-complying:

Form of development	Exceptions				
Advertisement and/or advertising hoarding	Except where: (a) it measures 6 metres or less in height (b) the advertisement area satisfies the following criteria: <table border="1"><thead><tr><th>Advertisement area (square metres)</th><th>Additional area per metre of site frontage with a public road or public thoroughfare (square metres)</th></tr></thead><tbody><tr><td>2</td><td>0.1</td></tr></tbody></table>	Advertisement area (square metres)	Additional area per metre of site frontage with a public road or public thoroughfare (square metres)	2	0.1
Advertisement area (square metres)	Additional area per metre of site frontage with a public road or public thoroughfare (square metres)				
2	0.1				
Auction room within Precinct 7 Mile End .					
Bus depot					
Bus station within Precinct 8 Open Space					
Caravan park within Precinct 7 Mile End					
Community centre within Precinct 8 Open Space					
Consulting room where located within the Recreation Policy Area 5					
Crematorium where located within the Recreation Policy Area 5					
Demolition of all or part of a building identified as a State heritage place within the Recreation Policy Area 5					
Dwelling where located within the Recreation Policy Area 5					
Emergency services facility within Precinct 8 Open Space					
Fuel depot					
Hall within Precinct 7 Mile End and/or within Precinct 8 Open Space					

Form of development	Exceptions
Hospital where located within the Recreation Policy Area 5	
Horticulture	
Hotel within Precinct 8 Open Space	
Industry	
Indoor recreation centre within Precinct 8 Open Space	
Intensive animal keeping	
Land division where located within the Recreation Policy Area 5	Except where no additional allotments are created partly or wholly within the policy area.
Library within Precinct 8 Open Space.	
Motel where located within the Recreation Policy Area 5	
Major public service depot	
Motor repair station	
Nursing home where located in the Recreation Policy Area 5	
Office where located within Precinct 8 Open Space	Except where associated with community or recreation facilities.
Petrol filling station	
Place of worship	
Plant nursery within Precinct 7 Mile End	
Prescribed mining operations	Except within Precinct 8 Open Space .
Primary school within Precinct 8 Open Space.	
Public service depot within the Recreation Policy Area 5.	
Radio studio within Precinct 8 Open Space	
Residential flat building where located within the Recreation Policy Area 5	
Road transport terminal	
Service trade premises	
Shop or group of shops	Except where located within Precinct 7 Mile End and either (a) or (b) is satisfied: (a) the premises will be used as a restaurant (b) the gross leasable area of a shop (except a restaurant) is 250 square metres or less.
Stock sales yard	
Stock slaughter works	

Form of development	Exceptions
Store	
Supported accommodation	
Television studio within Precinct 8 Open Space	
Warehouse	
Waste reception, storage, treatment or disposal	
Wrecking yard	

Public Notification

Categories of public notification are prescribed in Schedule 9 of the *Development Regulations 2008*.

Further, the following forms of development (except where the development is non-complying) are designated:

Category 1	Category 2
Netball facility within Precinct 7 Mile End . Stadium within Precinct 7 Mile End . Within the Precinct 7 Mile End , the following forms of development where ancillary to a stadium or netball facility: (a) club room (b) consulting room (c) gymnasium (d) office (e) recreation area (f) shop measuring 250 square metres or less in gross leasable floor area (g) training and seminar room (h) stadium for sport and spectator event.	Within the Precinct 7 Mile End : (a) community centre (b) exhibition centre (c) meeting hall.