

# **Attachment Folder**

## **Item 8.1**

### **Ordinary Meeting**

**Thursday, 24 July 2025**

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## DETAILED ASSESSMENT REPORT

### PROPOSED TELECOMMUNICATIONS FACILITY MCU23/0264

Link to Development.i - [MCU23/0264](#)

<b>SUMMARY SHEET</b>	
<b>Applicant:</b>	Waveconn Operations Pty Ltd
<b>Application No:</b>	MCU23/0264
<b>Consultant:</b>	SAQ Consulting Pty Ltd
<b>Owner:</b>	Mr PG Mahony & Mrs RA Mahony
<b>Proposal:</b>	Development Permit for a Material Change of Use of Premises to Establish a Telecommunications Facility
<b>Properly Made Date:</b>	15 January 2024
<b>Information Request:</b>	6 February 2024
<b>Information Response:</b>	23 July 2024
<b>Further Advice:</b>	14 October 2024
<b>Further Advice Response:</b>	10 December 2024
<b>Decision Due:</b>	25 July 2025
<b>Properly Made Submissions:</b>	443 (including 6 petitions)
<b>State Referral Agencies:</b>	Not applicable.
<b>PROPERTY DETAILS</b>	
<b>Division:</b>	5
<b>Street Address:</b>	1-9 Campbell St WOOMBYE
<b>RP Description:</b>	Lot 794 C 311688
<b>Land Area:</b>	11,410m <sup>2</sup>
<b>Existing Land Use:</b>	Rural
<b>STATUTORY DETAILS</b>	
<b>Planning Scheme:</b>	Sunshine Coast Planning Scheme 2014 (16 May 2022)
<b>SEQRP Designation:</b>	Urban Footprint
<b>Strategic Framework Land Use Category:</b>	Rural Enterprise and Landscape Area
<b>Local Plan Area:</b>	Woombye
<b>Zone:</b>	Rural
<b>Assessment Type:</b>	Impact assessment

## PROPOSAL:

The application seeks approval for a Development Permit for a Material Change of Use of Premises to Establish a Telecommunications Facility.

The proposal seeks to establish a 31.3 metre tall monopole and ground-based equipment, located on land included within the Rural zone at the western edge of the Woombye township. The applicant has acquired Optus as the carrier to provide network services to Woombye and surrounds.

The submitted Site Plan, Site Layout plan and Site Elevation are provided below.

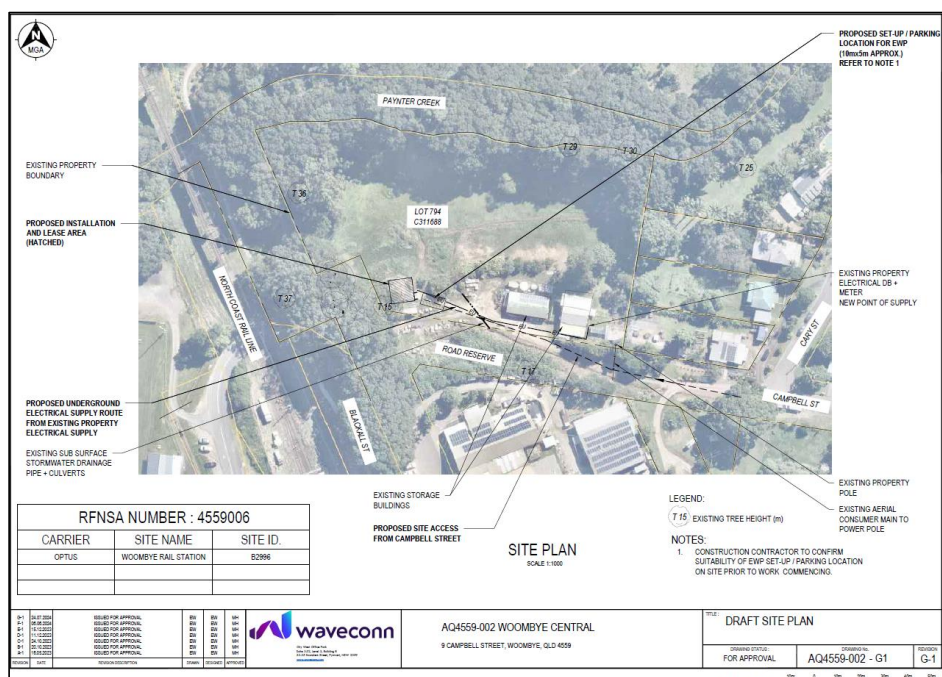
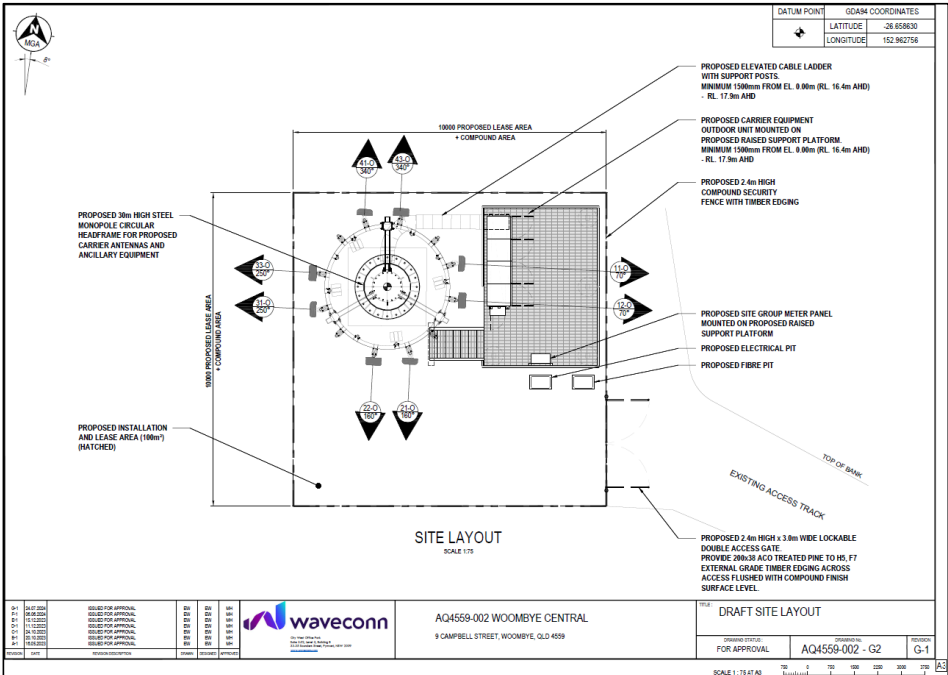


Figure 1: Proposed Site Plan



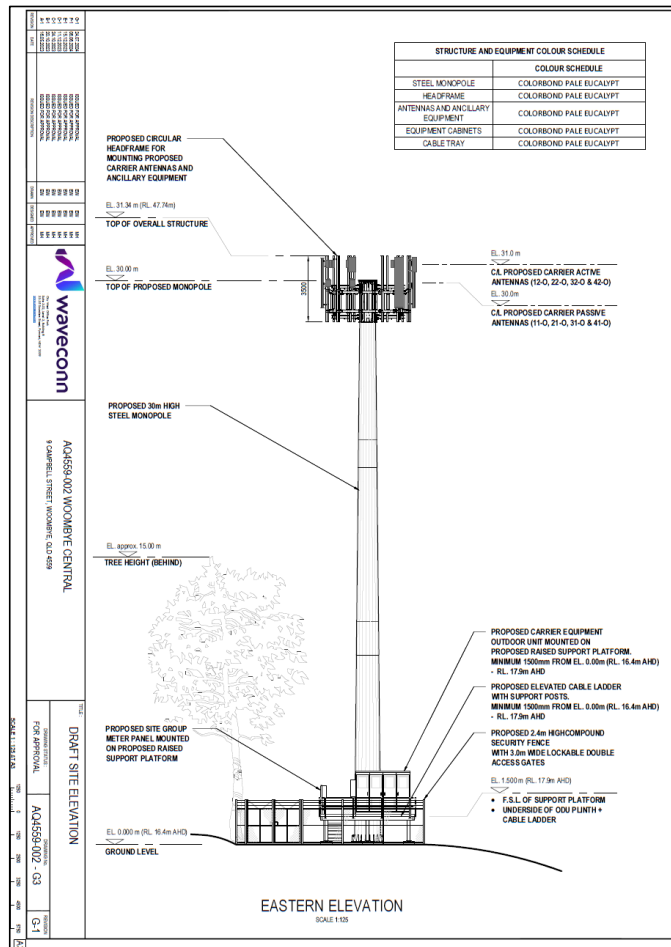


Figure 3: Proposed Elevation

The applicant has provided the following information as the background to the reasoning for the proposal:

*“Waveconn is a licenced carrier for the purposes of the Telecommunications Act 1997 (Cth) and operates as an infrastructure provider or ‘neutral host’, whereby new facilities are sited, designed, acquired, built and maintained by Waveconn but utilised by carriers as part of their respective networks. This proposal will be utilised by Optus to provide network services to Woombye and surrounds.*

*The proposal (as lodged) was to establish a telecommunications facility, in the form of a 40-metre tall monopole, antennas, equipment shelter and ancillary equipment and works at 9 Campbell Street, Woombye (note: this was the former proposal which was properly made on 2 August 2021 and subsequently withdrawn - Council reference no. MCU21/0219). As stated above, Optus will utilise the proposed facility as part of its 4G and 5G network and collocation of at least one additional carrier on the structure will be possible.*

*The subject land is located within the Rural Zone pursuant to the Planning Scheme and is an impact-assessable form of development. The location is also within the Woombye Local Plan Area.*

*A brief cover letter was provided at the time of lodgement. This letter constitutes a detailed planning statement as to the merits of the proposal to assist Council with its determination of the application. Larchus has also completed a detailed visual impact assessment as requested by the Action Notice, which is attached to this planning statement and is relied upon throughout."*

The applicant has provided the following information as the background to the need for the facility and site selection:

***"Need for the Facility***

*The proposed facility will provide new and improved Optus coverage to Woombye main street, township and surrounds, including significant improvements to network coverage and capacity (including indoor coverage) to the residential area, the rail corridor and transport thoroughfares in the area.*

*Woombye is part of the environs of Nambour, which is the nominated major activity centre for the hinterland and lies a relatively short distance to the north. As such, with growth and investment intended to be directed to this area it is inevitable that Woombye and other localities surrounding Nambour will be impacted by that growth. In turn, essential infrastructure, including telecommunications, will need to keep pace with demand.*

*There are very few Optus facilities in the wider area, with the nearest being a facility at the water reservoir on Woombye Palmwoods Road (corner Taintons Road), about 1.94 kilometres from the proposed facility. The next closest Optus facility is located in Nambour, more than 2.2 kilometres away.*

*As a result, the Optus coverage in Woombye is generally poor given the distances to the nearest existing facilities, with undulating topography and vegetation cover also greatly limiting its ability to serve the township. This directly impacts indoor coverage and data speeds in particular.*

*The only other existing facility within two kilometres is a Telstra 'small cell' facility located on a power pole on Hill Street in Woombye, about 300 metres away. Small cells are an entirely different type of facility to the one proposed at Campbell Street and also serves a different function within the Telstra network.*

*The small cell consists of three small and low-powered antennas mounted 6 metres above the ground which provide some level 4G and 5G coverage to the immediate surrounds (up to a few hundred metres at most), primarily Blackall Street, as the closest Telstra facility is more than 2.2 kilometres away in Nambour. However, the undulating nature of the area combined with significant vegetation in some parts will also limit the effectiveness of the small cell and it does not provide an overall solution for Woombye and will not serve the town surrounds or rail corridor. As such, this is not a facility relevant to an assessment of the subject application, nor is it a collocation opportunity.*

*Instead, the proposed facility will allow Optus to provide greatly improved network coverage and access to its full suite of services to a much wider area, with much better indoor coverage and significantly more network capacity, allowing for faster data speeds and a greater number of simultaneous users.*

*Figure 1 below (Figure 4 in Council's report) shows an extract from [www.rfnsa.com.au](http://www.rfnsa.com.au), which is essentially a database of all existing (and proposed) facilities in Australia. The proposed facility is marked in orange, with other existing facilities in the surrounding area shown (all have Optus equipment present) and the Telstra small cell marked.*

*Given Optus is already present at the three closest existing similar facilities, there is no opportunity for collocation to occur in this instance, rather than construct a new facility. The existing Optus facilities are too far away, are primarily designed to serve completely different areas and cannot be upgraded to better service Woombye. Once the proposed structure is in place, it will also be suitable and available for collocation.*

*At distances of more than about 1-1.3 kilometre between base-stations, 4G services are unreliable with generally poor data performance and indoor service. Performance is also affected by local topography, tree cover and other obstructions, as well as the demand on the services from customers.*

*Distance between base-stations is even more problematic for 5G services, which require a greater density of facilities than 4G and as such the proposed facility is well placed to provide high quality 5G services to the township.*



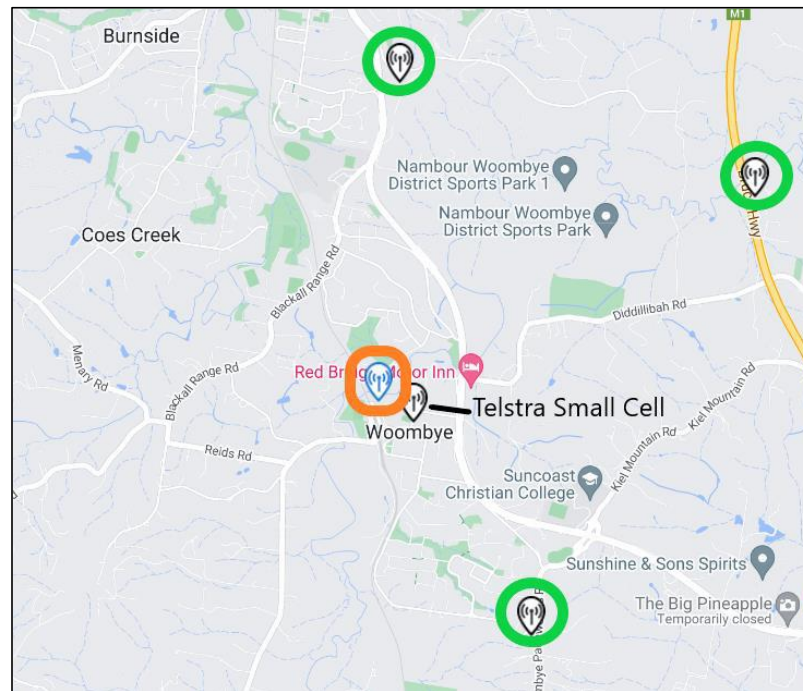


Figure 4: Proposed Location (orange square) and surrounding facilities (green circles)

Given the total lack of existing telecommunications infrastructure and other tall structures in the area, collocation is also not an option for addressing future requirements and a new structure will be required to provide the necessary services and meet customer demand.

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

#### Coverage Area

Coverage analysis has been undertaken by Waveconn's radio-frequency engineers based on Optus 4G coverage at 1800MHz. The 1800 MHz frequency is selected as it is the first frequency 'layer' devices attempt to access and is the one primarily used for high-speed data and so such mapping provides a very likely 'real world' outcome in terms of customer experience and all three of the maps below are directly comparable.

In terms of the colouring, -90dBm (green) is a signal level at which reliable indoor coverage is likely to occur, whilst below -100dBm (yellow) indoor coverage is much less likely, noting the locality is difficult to service in any event due to complex terrain and extensive tree cover.

Figure 2 below (Figure 5 in Council's report) shows the current Optus coverage in Woombye and surrounds. As can clearly be seen, the Woombye township is poorly

served with only patchy outdoor coverage likely to be available. As well as this poor level of service, data speeds would be slow (particularly during peak times), indoor coverage poor to non-existent and drop-outs common.

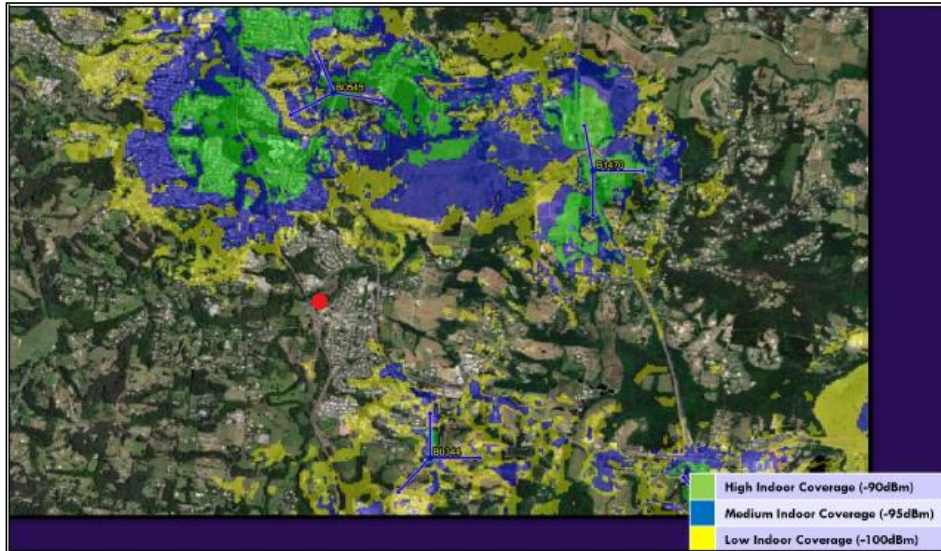


Figure 5: Existing Optus coverage in the area

Figure 1 (Figure 4 in Council's report) also confirms that there is no possibility of collocating on existing facilities in order to service the township (noting that Optus is already present on all of the facilities shown in that figure) as those existing facilities are simply too far away to provide the signal strength improvements needed.

The proposed facility will also provide 5G services to Woombye, the proper operation of which requires even closer spacing between facilities to be effective due to a smaller coverage area. The benefits of 5G include much higher data speeds and network capacity, which allows more users to be served simultaneously and is an important tool in ensuring a high level of service to customers. However, due to the constraints of 5G in terms of its reach there is no feasible way to provide useful and reliable 5G services to Woombye without additional infrastructure much closer to the township and the population that is to be served.

The current level of wireless network service is not consistent with modern customer expectations nor with Council's Smart Cities program or the Strategic Framework as set out at 3.6.7.1 of the Planning Scheme, which state:

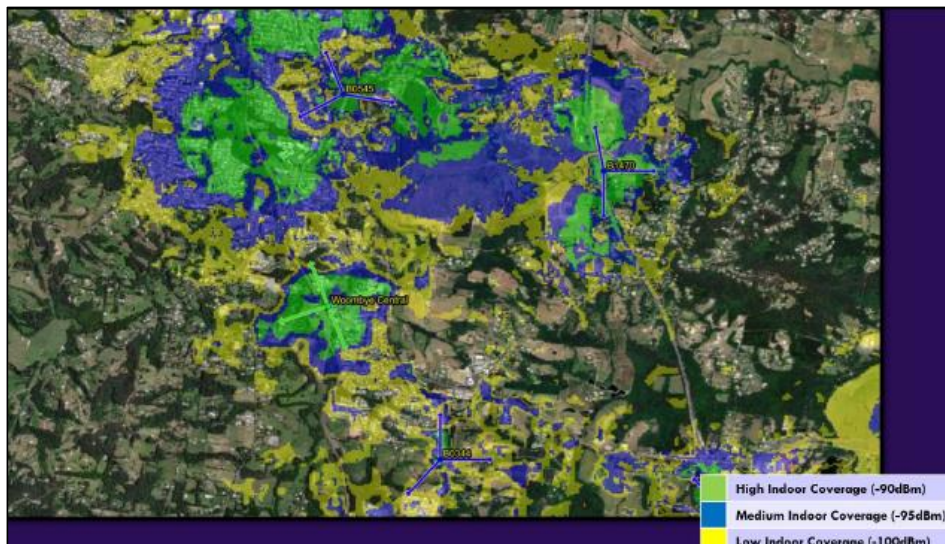
- The Sunshine Coast Region is serviced by telecommunications infrastructure that meets the needs of the community and supports economic development.
- The provision of high speed internet and telecommunications infrastructure is facilitated. Where technically feasible, development provides:-
  - (i) open access broadband telecommunications infrastructure including optic fibre to every premises; and
  - (ii) broadband wireless coverage to every premises.

(emphasis added)

*These outcomes are demonstrably unachievable at Woombye without additional infrastructure and affect both the resident population, businesses and visitors to the town, including those conducting business such as tradies, pop-up shops and other mobile employees who rely on voice and data connectivity as well as for payment systems such as EFTPOS and the like.*

*Without additional infrastructure in or near the town it is also not possible to improve the very poor levels of service experienced along the main trunk railway corridor through the area, including at Woombye Station.*

*Figure 3 (Figure 6 in Council's report) shows the coverage improvements as a result of the proposed facility at Woombye. It can clearly be seen that virtually all of the township proper will see improvements with much of the population receiving reliable and robust indoor service, meaning much better access to high-speed data services.*



*Figure 6: Predicated Optus coverage improvements from the proposed facility*

*Telstra experiences similar issues with coverage and service levels within Woombye as Optus due to Telstra's existing base-stations being similarly distant from the town. In recent years, Telstra has installed a 'small cell' antenna on a utility pole in Hill Street. This small cell facility has three small panel antennas mounted at height of 6 metres and provides 4G and 5G services at 2600 MHz to the immediately surrounding area - up to about 100-200 metres from the facility, but is highly dependent on terrain and obstructions due to much lower power levels. As a result, this 'better than nothing' solution still leaves most of the town un-served by the small cell, which also cannot improve coverage at Woombye Station or along the rail corridor.*

*As such, while the existing small cell provides some improvement it is not a long-term or comprehensive solution for the township, nor does it provide any opportunity for collocation.*



*In contrast, the proposed facility will – as desired by the Strategic Framework - meet the needs of the community for telecommunications services, will support economic development and provide broadband wireless coverage to hundreds of additional premises within the township, thereby providing a comprehensive solution for the township and surrounds as well as ensuring there is an opportunity for a second carrier to collocate.*

*In fact, an analysis of dwelling numbers within the township indicates that around 348 unique dwellings will receive at medium-high levels of indoor coverage from the new facility Figure 4 below, (Figure 7 in Council's report), which is likely to be approaching 1,000 people. Add to this the benefits to businesses and visitors to the town and the impact of the proposed facility and the improved levels of service cannot be understated and are highly consistent with the desired outcomes of the Strategic Framework in that respect."*

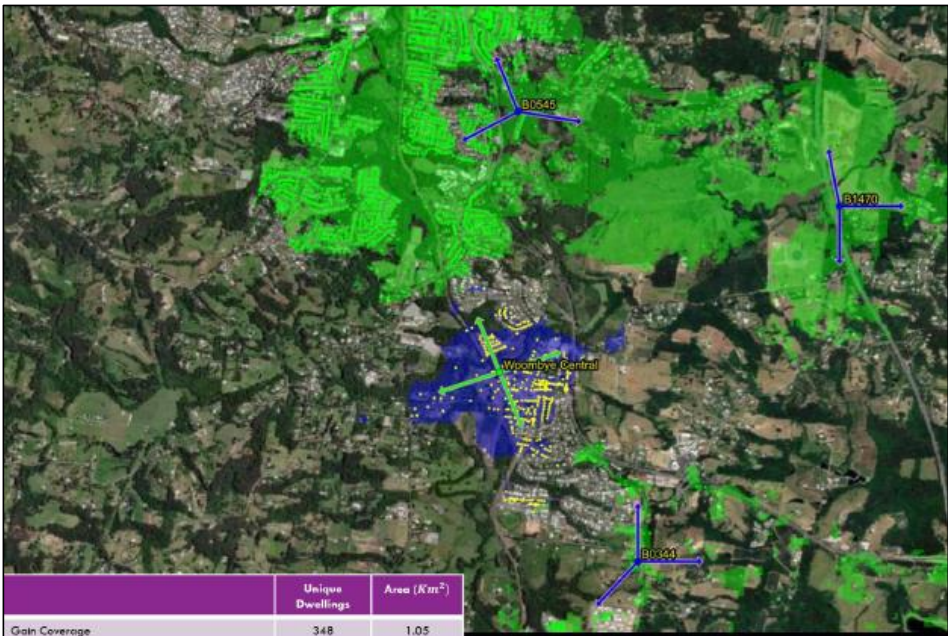


Figure 7: Predicted Optus coverage improvements - dwelling analysis

The applicant has provided the following information on the proposal particulars:

**“The Proposal**

*The proposal is to establish a new telecommunications facility in the form of a monopole and ground-based equipment on the subject land at 1-9 Campbell Street, WOOMBIE. As noted above, subsequent to the lodgement of the original application with a 40m-tall monopole proposed, further consideration of the proposal has resulted in a reduction in height to 31.3 metres.*

*The details of the proposed facility are shown on the amended plans attached but more particularly, the proposal consists of the following elements:*

- a 31.3 metre tall monopole located near the south-western corner of the land in an 100sqm compound (10m x 10m);
- a new circular headframe mounted at the top of the monopole to accommodate eight (8) panel antennas (4 each for 4G and 5G services), giving a maximum overall finished height of 31.34m above ground level;
- a 4-bay equipment cabinet (dimensions 2.33m H x 2.87m W x 0.75m D) located to the east of the proposed monopole and connected to the monopole by an overhead cable tray; and
- security fencing with double gates for access.

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

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

*The monopole, headframe and antennas are proposed to be finished in Colorbond 'Pale Eucalypt' (or as directed by Council). The location selected for the facility is already clear of vegetation and access is already available via existing arrangements.*

*Whilst not a relevant planning issue, it is worthy of note that the maximum levels of electromagnetic energy from the proposed facility at 1.5m above the ground is estimated at 1.38% of the exposure limits mandated by the Commonwealth Government. A copy of the standard form EME report is attached for Council's information.*

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

The applicant has further provided the following information on the suitability of the chosen site and consideration of alternative sites, in response to Council's Information Request:

***"Site suitability & visual impacts***

*It is relevant to state at the outset that, as a matter of fact, the proposed facility is located in an appropriate zone, being the Rural Zone, whether that is considered in terms of the expectations of the Planning Scheme for this type of infrastructure, the lack of availability of other 'more appropriate' zones within the immediate locality or in terms of the general expectation of the community that such infrastructure is located in non-residential zones.*

As noted above, the proposed facility has been shifted a few metres to the south-east and due to the sensitivity of the potential visual impact on the locality, the Larchus report submitted with the original documentation (dated 14/12/23) has been re-visited by Mr Powell to ensure:

- The revised location is accurately taken into consideration and the analysis and conclusions of the December 2023 Larchus report are updated in respect of this new location; and
- To directly address the matters raised in part 1 (a), (c) and (d) of the Information Request with respect to both a visual impact analysis and the relevant parts of the Planning Scheme – in particular, the Telecommunications facility code and the Scenic amenity overlay code.

The updated and more comprehensive Larchus report (dated 12 July 2024) is attached for Council's perusal and after a lengthy and in-depth expert analysis concludes at paragraph 23:

*"That assessment has been provided above and demonstrates that there are unlikely to be any unreasonable impacts on surrounding residential amenity as a consequence of the proposed development and, for completeness, confirms that there are also unlikely to be any unreasonable impacts on either the scenic route or on other public locations."*

It goes on further to conclude:

- a) The proposed Telecommunications Facility can be seen to meaningfully respond to existing character and amenity via appropriate siting, design and treatment;
- b) there are unlikely to be any unreasonable impacts on the scenic route, other public roads, or on surrounding residential amenity as a consequence of the proposed development; and
- c) The Planning Scheme benchmark raised in the Action Notice is seen to be complied with.

Council's attention is particularly drawn to the analysis of existing character and visual values (paragraph 5 onwards), impact of the proposal on the scenic route (paragraph 10 onwards) and impacts on residential amenity (paragraph 14 onwards).

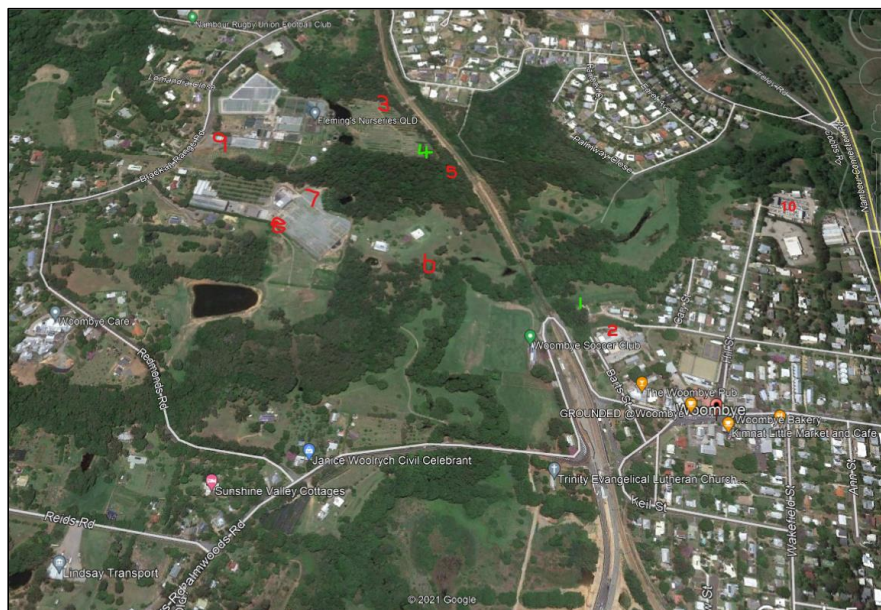
Having visited the subject land and the surrounding area on numerous occasions, I concur with the robust analysis and ultimate conclusion of the Larchus report and commend it to Council.

Further, and deferring of course to Mr Powell's expertise in this area, there is simply nothing in the Larchus report that could reasonably lead to the conclusion that the likely impacts are unreasonable or even particularly material, whilst the benefits of the proposal for the entire township are substantial and demonstrable (see coverage analysis discussion below). It is not a requirement of the Planning Scheme (nor would it be realistic) for such infrastructure to be unseen or have zero visual impact and is not a basis on which such proposals can be reasonably refused. In this instance it is clearly demonstrated that the impacts have been minimised and managed to an acceptable level – even on the nearest residential uses – and that balances the need for service with visual impact.

*In terms of part 1 of the Information Request this leaves only a discussion on alternate sites considered, the colour palette of the infrastructure and whether additional landscaping should be considered.*

*In terms of alternate sites considered, the choices of suitable land were limited by the requirements to be as near the township as possible (in particular the west side to ensure the railway corridor is adequately covered), the undulating topography and the extent of residential uses in the area.*

*Figure 1 (Figure 8 in Council's report) below shows the four properties considered, with further details as follows.*



**Figure 8: Subject site and alternates locations considered**

*Location 1 - Subject land.*

*Location 2 - Industrial/commercial land at the end of Barts Street – owner not interested.*

*Locations 3-9 – various locations at Flemings Nursery, with location 4 preferred. Other locations on the land were dismissed due to lack of access (steep land), requirement to extensively clear vegetation, elevation of the land and distance from the township.*

*Although the nursery land was considered in detail it ultimately became unavailable when one of the owners decided not to proceed with an agreement to lease.*

*Location 10 – industrial/commercial land at the end of Hill Street. This location was deemed unsuitable as it too low and on the 'wrong' side of the hill to provide good levels of coverage to the town centre and in particular to the south-west, which*

*includes the railway station. A facility in this location would also be much more visible to Nambour Connection Road (a designated scenic route) than the subject proposal.*

*Accordingly, the subject proposal is considered suitable and, as confirmed in the Larchus report, is appropriately coloured and finished as well as adequately screened by existing vegetation from most of the residential area and scenic routes.*

*Further, there are no other available and obviously better locations in the area that would minimise impacts further and still achieve the desired service improvements as a similar structure type and height would be required (as would the ability to enter into a commercial leasing arrangement with the landowner). Based on Waveconn's investigations, such an outcome in an alternate location is extremely unlikely and no such location could be identified.*

*In respect of the colour palette, it is proposed to colour the monopole, antennas, headframe and equipment cabinets in a consistent Pale Eucalypt (as noted on the updated proposal plans). This will ensure the monopole and headframe in particular blend as much as possible with the substantial tree cover in the area, as set out in the Larchus report.*

*Given that extensive tree cover and the 'lower in the landscape' position of the base of the monopole and equipment platform/cabinets, additional landscaping is unlikely to have any material effect on the impact of the structure – an opinion shared by the Larchus report. As such, no additional landscaping is proposed but could be included should Council consider it meaningful to do so."*

The following table describes the key development parameters for the proposal:

MATERIAL CHANGE OF USE	DEVELOPMENT PARAMETERS	
	Design solution offered by the codes as an Acceptable Outcome for achieving compliance	Proposed
Building Height/Storeys	Of a similar height to surrounding structures or vegetation (in partial fulfillment of the Performance Outcome)	31.34m
Setback to street boundary	A distance at least equal to the front setback required for the adjoining use	Approximately 3m from road boundary to corner of proposed lease area  Approximately 8m to edge of antennae (top of pole)
Distance from nearest residential use or park	400m	Approximately 90m from proposed lease area to closest residential property at 11-14 Campbell Street (~127m to rear of dwelling)



Distance from nearest public pathway	20m	Approximately 38m east of the north-south path connecting Blackall Street to Paynter Park Drive
Distance from nearest approved telecommunications facility (not including low-impact facilities per the planning scheme definition)	1km (in partial fulfillment of the Performance Outcome)	<p>Corner of Woombye Palmwoods Rd and Taintons Rd (~1.94km)</p> <p>Kelks Hill Rd, Nambour (2.18km) state-owned land with tower.</p> <p>53 Spalls Rd, Rosemount (~2.97km)</p> <p>Next nearest facilities: 8 Church St, Palmwoods (~3.33km)</p> <p>2 Nambour Connection Rd, Woombye (~3.79km)</p> <p>66-90 Ratcliffe Rd, Hunchy (~3.97km)</p>
Landscaping	3m wide landscape strip between any building associated with the use and any street front boundary or adjoining use	Not provided on submitted plans, but landscaping could be conditioned on any approval.

## SITE DETAILS:

### Site Features and Location

SITE AND LOCALITY DESCRIPTION	
Land Area:	11,410m <sup>2</sup>
Existing Use of Land:	Dwelling house
Road Frontage:	215m to Campbell Street & unnamed western reserve
Significant Site Features:	Dwelling house and multiple shed/ancillary structures
Topography:	Decline from southeast corner of site adjacent Campbell Street (19m AHD) to centre of site (14m AHD). Majority of site relatively level, varying between 14m AHD and 15m AHD.
Surrounding Land Uses:	Residential uses to east. Commercial/industrial uses across Campbell Street to the south. Road and rail reserve land to the west.

	Paynter Creek and Drainage Reserve to the north (with Paynter Park Drive residential area further north).
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The location of the subject site in relation to its surrounds is shown below:

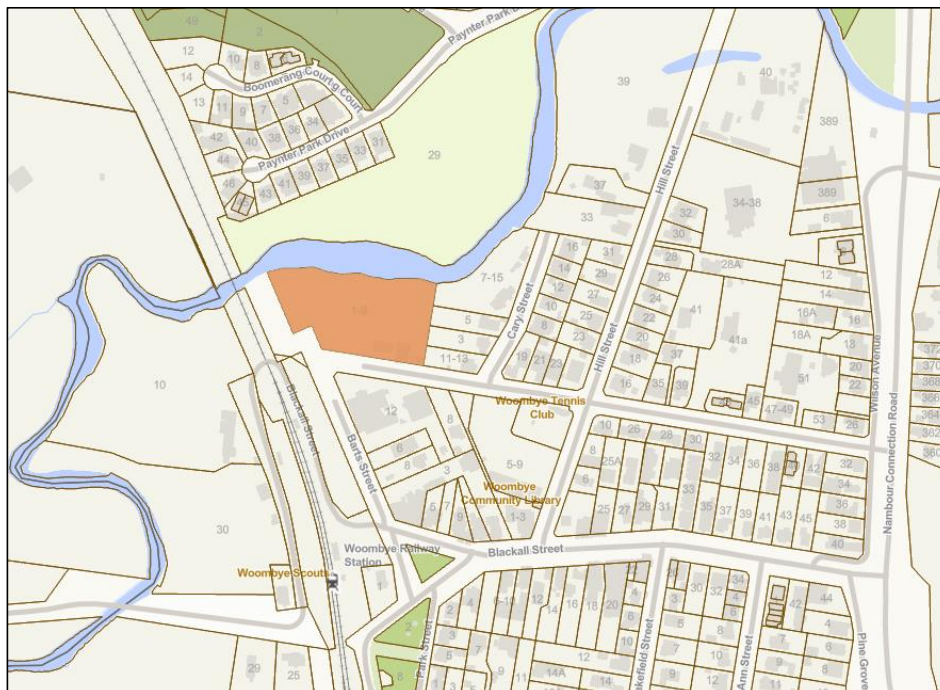


Figure 9: Street location map (site in orange)

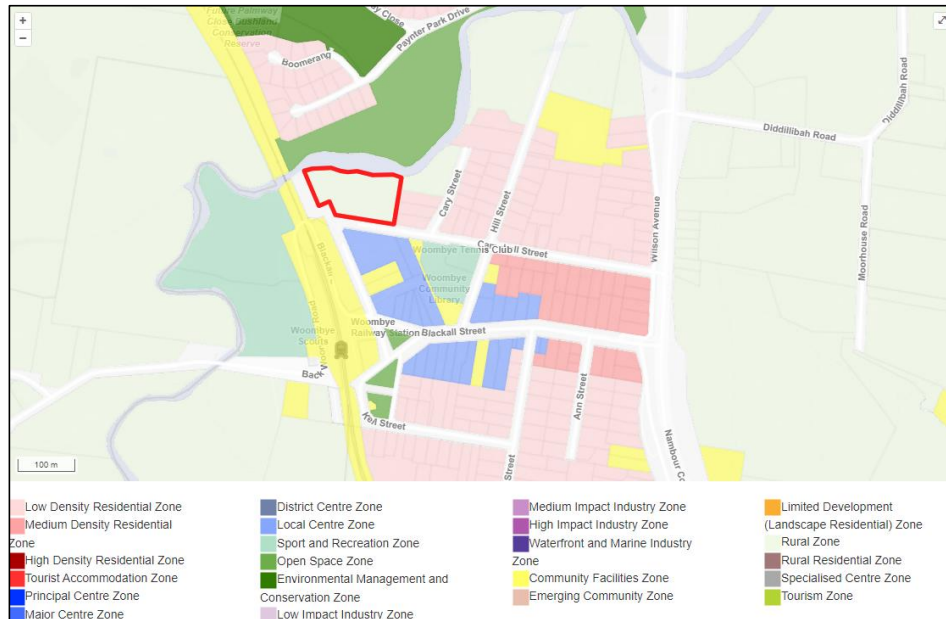


Figure 10: Zoning map (SCC Site Report, February 2025)



Figure 11: Site aerial

## Development History of Site

APPLICATION NO.	DECISION AND DATE
MCU21/0219	Application for a Development Permit for a Material Change of Use to establish Telecommunications Facility. Withdrawn by applicant on 9 December 2021.
PC05/2624	Building Private Certification for Shed, Finalised 26 August 2005.

## ASSESSMENT:

### Framework for Assessment

#### Categorising Instruments for Statutory Assessment

For the *Planning Act 2016*, the following categorising instruments may contain assessment benchmarks applicable to development applications:

- the *Planning Regulation 2017*
- the Planning Scheme for the local government area
- any temporary local planning instrument
- any variation approval

Of these, the planning instruments relevant to this application are discussed in this report.

### Assessment Benchmarks Related to the *Planning Regulation 2017*

The *Planning Regulation 2017* (the Regulation) prescribes assessment benchmarks that the application must be carried out against, which are additional or alternative to the assessment benchmarks contained in council's Planning Scheme. These assessment benchmarks may be contained within:

- the SEQ Regional Plan and Part E of the State Planning Policy, to the extent they are not appropriately integrated into the Planning Scheme; and
- Schedule 10 of the Regulation.

PLANNING REGULATION 2017 DETAILS	
Applicable Assessment Benchmarks:	<u>State Planning Policy</u> <ul style="list-style-type: none"> <li>• Part E</li> </ul>

#### State Planning Policy (SPP), Part E

The assessment benchmarks of the SPP Part E that are relevant to the development proposal do not vary the current provisions of the Planning Scheme.

### Assessment Benchmarks Related to the Planning Scheme

The following sections relate to the provisions of the Planning Scheme.

<b>PLANNING SCHEME DETAILS</b>	
<b>Planning Scheme:</b>	Sunshine Coast Planning Scheme 2014 (16 May 2022)
<b>Strategic Framework Land Use Category:</b>	Rural Enterprise and Landscape Area
<b>Local Plan Area:</b>	Woombye local plan area
<b>Zone:</b>	Rural zone
<b>Consistent/Inconsistent Use:</b>	Potentially Consistent
<b>Applicable Assessment Benchmarks:</b>	<p>The <i>Sunshine Coast Planning Scheme 2014</i> as a whole, including in particular:</p> <ul style="list-style-type: none"> <li>• The Strategic Framework of the <i>Sunshine Coast Planning Scheme 2014</i></li> <li>• <i>Biodiversity, waterways and wetlands overlay code</i></li> <li>• <i>Flood hazard overlay code</i></li> <li>• <i>Scenic amenity overlay code</i></li> <li>• <i>Woombye local plan code</i></li> <li>• <i>Rural zone code</i></li> <li>• <i>Telecommunications facility code</i></li> <li>• <i>Prescribed other development codes</i></li> </ul>

### **Strategic Framework**

The Strategic Framework is an Assessment Benchmark for Impact Assessable applications and considers the following matters:

- Settlement Pattern
- Economic Development
- Transport
- Infrastructure and Services
- Natural Environment
- Community Identity, Character and Social Inclusion
- Natural Resources
- Natural Hazards

The application has been assessed against each of the matters above. Of particular relevance to the application are Theme 4 – Infrastructure and Services and Theme 6 – Community Identity, Character and Social Inclusions. These themes are discussed below.

### **Theme 4 – Infrastructure and Services:**

#### **Strategic Outcomes**

The following Strategic Outcomes for the Infrastructure and Services Theme are applicable to the development:

#### **Strategic Outcome 3.6.1 (a)**

*In 2031, coordinated, timely and efficient infrastructure and services are provided to communities and places on the Sunshine Coast to meet the long-term needs of the*

*community, support growth, maintain a quality lifestyle and facilitate regional economic development.*

**Strategic Outcome 3.6.1 (b)**

*Infrastructure and services are designed to maximise the capacity and flexibility of existing and proposed networks, ensure the efficient use of natural resources and avoid or minimise adverse environmental and community impacts.*

**Strategic Outcome 3.6.1 (h)**

*A high speed digital telecommunications network is in place that supports technology based enterprise on the Sunshine Coast and a broader local economy within a global business and communications environment.*

The following Elements and Specific Outcomes for the Infrastructure and Services Theme are particularly applicable to the proposal:

Element 1 - Coordinated and Sustainable Infrastructure - Specific Outcomes

**Specific Outcome 3.6.2.1 (e)**

*Infrastructure is designed to respond to the needs, scale, character and identity of local communities including coastal urban, rural town and village, rural residential and rural communities*

**Specific Outcome 3.6.2.1 (i)**

*Infrastructure is located and designed to protect the landscape amenity of the Sunshine Coast and make a positive contribution to the landscape character, identity and sense of place of the locality.*

Element 6 – Telecommunications Infrastructure - Specific Outcomes

**Specific Outcome 3.6.7.1 (a)**

*The Sunshine Coast Region is serviced by telecommunications infrastructure that meets the needs of the community and supports economic development.*

**Specific Outcome 3.6.7.1(b)**

*The provision of high speed internet and telecommunications infrastructure is facilitated. Where technically feasible, development provides:-*

- (i) open access broadband telecommunications infrastructure including optic fibre to every premises; and*
- (ii) broadband wireless coverage to every premises.*

**Specific Outcome 3.6.7.1(c)**

*Telecommunications infrastructure is:-*

- (i) located and designed to ensure its safe deployment and operation;*
- (ii) integrated in a sustainable and attractive manner which does not unduly impact on the amenity and landscape values of the area; and*
- (iii) co-located wherever possible.*

Comment

The proposal provides for telecommunications infrastructure to meet the needs of the community and supports economic development, noting the absence of appropriate Optus



mobile service to the Woombye town centre and immediate surrounds. Whilst the proposal would not specifically provide for high speed internet (i.e. by forming part of the NBN fixed wireless network), it would provide for an improvement to the availability of mobile services and an overall improvement to telecommunications infrastructure. The proposal would therefore achieve Strategic Outcomes 3.6.1(a) and 3.6.1(h) and would partially achieve Strategic Outcome 3.6.1(b). The proposal would also achieve Specific Outcomes 3.6.7.1(a) and 3.6.7.1(b).

However, due to the proposed Telecommunications Facility being located in close proximity to a number of residences and the likelihood of impacts upon visual amenity, it is considered that the proposal would not achieve part of Strategic Outcome 3.6.1(b) and Specific Outcomes 3.6.2.1(e), 3.6.2.1(i) and 3.6.7.1(c) because it would not avoid or minimise community impacts, and it would not be integrated in a sustainable and attractive manner that does not unduly impact on the amenity of residents in the area. As visual and amenity impacts are a key consideration in a number of assessment benchmarks for this proposal, this particular issue is discussed in greater detail throughout this report.

### Theme 6 – Community Identity, Character and Social Inclusion

The site is located in the Rural Setting at the periphery of the Rural Town Setting, within the Sub-Regional Inter Urban Break and adjoining the identified Scenic Route (North Coast Rail Line - Purple line), as shown on Strategic Framework Map SFM 6 below.

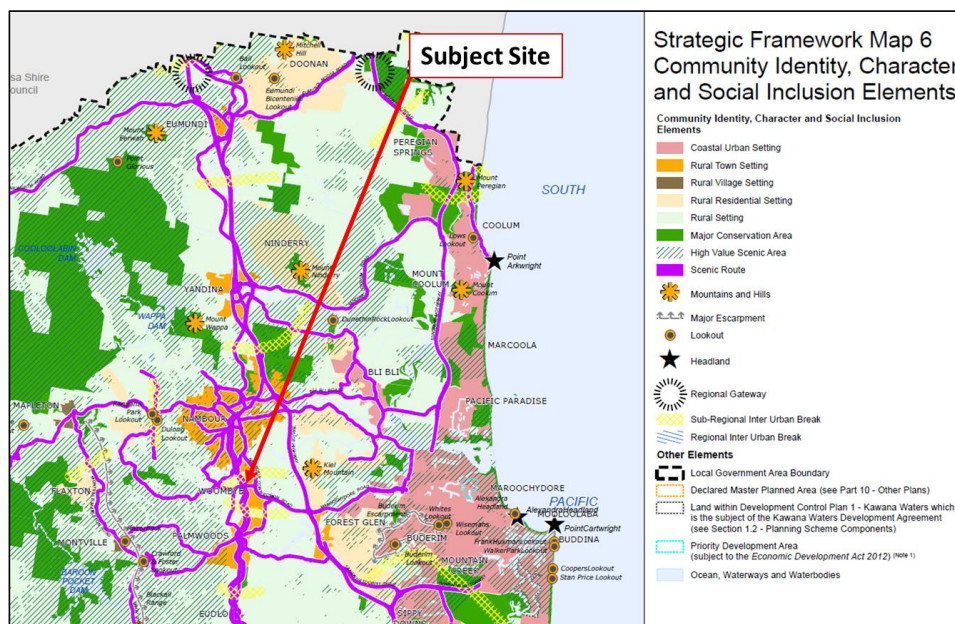


Figure 12: Extract from Strategic Framework Map 6

The following Strategic Outcomes for the Community Identity, Character and Social Inclusion Theme are applicable to the development.

#### Strategic Outcomes

**Strategic Outcome 3.8.1 (d)**

*The Sunshine Coast continues to be renowned for the many important views and vistas which contribute to the identity and attractiveness of the region. Local views of importance to residents are recognised and respected.*

**Strategic Outcome 3.8.1 (e)**

*Greenspace, nature and shaded, leafy places are incorporated within creatively designed built environments producing neighbourhoods, streets and places with a relaxed and settled subtropical ambience.*

**Strategic Outcome 3.8.1 (g)**

*The individual character of urban and rural residential areas is recognised within the context of coastal urban, rural town, rural village and rural residential settings. The diversity of rural settings and communities is also recognised and respected.*

The following Elements and Specific Outcomes for the Community Identity, Character and Social Inclusion Theme are particularly applicable to the proposal:

Element 1 – Landscape Elements and Features – Specific Outcomes

**Specific Outcome 3.8.2.1 (a)**

*The landscape elements identified conceptually on Strategic Framework Map SFM 6 (Community identity, character and social inclusion elements) which include regional and sub-regional inter-urban breaks, high value scenic areas, regional gateways and scenic routes are protected and enhanced.*

**Specific Outcome 3.8.2.1 (d)**

*Scenic routes are protected and enhanced as major transport routes providing a high level of scenic and visual amenity to travellers.*

**Specific Outcome 3.8.2.1 (g)**

*Other views and vistas, including those identified in local plans or which are important in a local context are also protected, particularly from development which exceeds specified building heights.*

Comment

As per Strategic Framework Map 6, the site is located in the Rural Setting (periphery of Rural Town Setting), Sub-regional Inter-urban Break, and adjoining a Scenic Route (North Coast Rail Line). The site is not located within the vicinity of a regionally significant landscape feature listed in Table 3.8.2.1.

The location of the proposed tower, near large mature vegetation allows the tower to be screened when viewed from the North Coast Rail Line scenic route. Images produced in Council's 3D model shows that it would be difficult to observe the proposed facility from the scenic route of the railway (refer to assessment of *Scenic amenity overlay code* in a later section of this report).

The mapped Sub-regional Inter-urban Break adjoining the site relates to Paynter Creek. The facility is unlikely to be highly visible from the Sub-regional Inter-urban Break due to the presence of vegetation within the site between the creek and the site of the proposed



facility. It is therefore considered that the proposed Telecommunications Facility would not significantly impact the Sub-regional Inter-urban Break.

The *Woombye local plan code* identifies a significant view from the intersection of Blackall Street and Keil Street to the Southwest, however the proposed development does not impact upon this significant view as the subject site is located to well the North.

It is therefore considered that the proposed Telecommunications Facility would not significantly impact the Sub-Regional Inter Urban Break, Scenic Routes or Views and thus achieve the intent of Specific Outcomes 3.8.2.1 (a), 3.8.2.1 (d) and 3.8.2.1 (g).

Having regard to the above, the proposal is considered to be consistent with Strategic Outcomes 3.8.1 (d) and (e), and Specific Outcomes 3.8.2.1 (a), (d), and (g) of the Strategic Framework.

However, due to the proposed Telecommunications Facility being located in close proximity to a number of residences, it would not positively contribute to both the residential and rural character intended for the area thus the character and rural setting of Woombye is not respected. As such, it is considered that the proposal would not achieve Strategic Outcome 3.8.1(g).

#### **Planning Scheme Codes**

The application has been found to conflict with one or more elements of the applicable codes of the planning scheme and cannot be conditioned to comply. The pertinent issues arising out of the assessment are discussed below.

##### **Biodiversity waterways and wetlands overlay code**

The proposed Telecommunications facility would be located in an already cleared area, well away from the high bank of Paynter Creek and would have limited impact on ecological connectivity. As such, the proposal is consistent with the Purpose and Overall Outcomes of the code. If approved, the proposal can be conditioned to comply with the requirements of the code.

##### **Flood hazard overlay code**

The site is mapped as subject to flooding from Paynters Creek during the defined flood event with a level of 17.88m AHD, which is approximately 1.5 meters above the ground surface level. The figure below shows the depth of flooding over the site during the defined flood event.

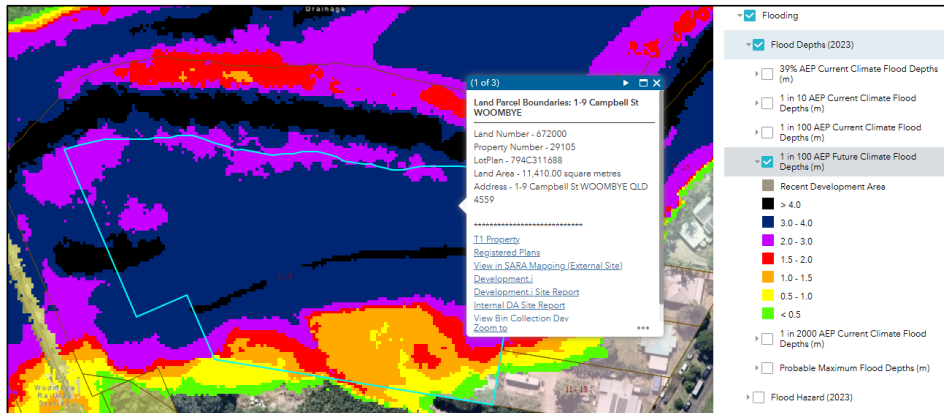


Figure 13: Depth of Flooding during the 1% AEP 2100 Flood Event

In response to Council's information request the proposal plans were amended, and a Flood Report was submitted.

Council's Principal Development Engineer (Hydraulics) concluded that the proposed Telecommunications facility would not result in any adverse flood impacts, and in the event of an approval conditions relating to flood immunity and flood management would be included. As such, compliance with the *Flood hazard overlay code* can be achieved with reasonable and relevant conditions.

#### Scenic amenity overlay code

The purpose of the *Scenic amenity overlay code* is to ensure that development does not adversely affect scenic amenity and landscape values within the Sunshine Coast. The subject site is located within the North Coast Rail Line scenic route. Overall Outcome 2(a) and Performance Outcome PO1 of the Code are as follows:

#### **Overall Outcome 2(a)**

*Development protects the significant landscape elements and features which contribute to the unique character and identity of the Sunshine Coast, including:-*

- (i) *the scenic amenity values visible from scenic routes.*

#### **Performance Outcome PO1**

*Development does not detract from the visual amenity of a scenic route and:-*

- (a) *is visually unobtrusive, relative to its urban or nonurban setting and surroundings, when viewed from the scenic route;*
- (b) *maintains or enhances important view corridors or distance views from the scenic route to significant landscape features; and*
- (c) *is low key, both visually and in scale, so as not to detract from the scenic amenity offered from the scenic route.*

As already discussed in the Strategic Framework section of this report, due to the proposed location of the Telecommunications facility on the site being screened from the rail line by mature vegetation on the site and within the road reserve, the tower would not be highly visible or dominant in the landscape, or impact on the scenic amenity of the scenic route and the landscape values of the area, when viewed from the scenic route. As

shown in the figures below, the view from the Woombye Soccer Club is indicative of what would be seen from a distance farther than the rail line - any passengers on the train would be located much closer to the tower and would not be able to see the proposal over the trees in the foreground.



*Figure 14: View from Woombye Soccer Club - Council 3D Model View Analysis*



Figure 15: Visual Assessment Photomontage view from Woombye Soccer Club (Source: Mark Elliott Illustrations)

Further, when viewed from the identified scenic route on Blackall Street, the proposal would be low-key and unobtrusive due to the presence of electrical infrastructure (power lines) and large mature vegetation (refer to the figure below). Blackall Street is considered a scenic route due to views of Blackall Range to the west/southwest. The proposed Telecommunications facility is located to the north of Blackall Street and thus it is considered that the development would not detract from the scenic route in any significant way.



Figure 16: Visual Assessment Photomontage view from Blackall Street North towards subject site  
(Source: Mark Elliott Illustrations)

In this regard, it is considered that the proposed Telecommunications facility would not detract from the existing scenic amenity offered from the scenic route in this particular location and would be consistent with the abovementioned Overall Outcome and Performance Outcome of the *Scenic amenity overlay code* in this instance.

#### Rural zone code

The Telecommunications facility is proposed to be located within the Rural zone. A material change of use for a Telecommunications facility is identified as a "potentially consistent use" within the Rural zone in the *Rural zone code*. Overall Outcome 2(v) of the zone code states that a potentially consistent use is "to occur in the Rural zone only where further assessment has determined that the use is appropriate in the zone having regard to such matters as its location, nature, scale and intensity."

The purpose of the *Rural zone code* is to provide for a wide range of rural activities and a limited range of non-rural activities which complement, value add or provide a service to rural areas. Activities in rural areas should maintain and enhance the character, visual amenity and rural production capability of the area.

The proposed facility would comply with some of the applicable Overall Outcomes of the *Rural zone code* which advance the purpose of the code in that:-

- The proposed facility would not compromise the use of the land for existing and future rural activities on either the subject site or adjoining sites as it does not occupy a large proportion of the site and would not interfere with rural activities on adjoining sites.

Further, it is noted that no rural activities are currently occurring on site or on the adjoining site. Additionally, it is considered that the proposal would have a limited impact on the rural amenity of the surrounding area as noise and traffic generation would be minimal [Overall Outcomes 2(e) and 2(f)].

- As discussed above in the Strategic Framework and *Scenic amenity overlay code* sections of this report, it is considered that the proposal does not detract from the existing scenic amenity offered from the adjacent scenic route [Overall Outcome 2(n)]
- As discussed in the Strategic Framework section, it is considered that the proposed facility would not adversely impact upon the Sub Regional Inter-urban Break [Overall Outcome 2(p)].
- The proposed facility minimises and mitigates impacts on ecologically important areas, subject to the imposition of conditions on any approval granted [Overall Outcome 2(q)].
- The proposed facility has been located to respond to the flooding constraint over the site [Overall Outcome 2(r)].

However, the proposed Telecommunications facility is a non-rural activity which would provide a service to the rural area and surrounding residential areas. The purpose of the zone code seeks for activities to maintain and enhance the character and visual amenity of the area. These requirements must be considered in balance with the acceptance that consistent uses would form part of the character and visual amenity of the area. With that consideration, and as discussed in a subsequent section of this report, assessment has determined that the use in its current form, is not appropriate in the proposed location due to the likely significant effect on visual amenity, specifically the visual amenity presently enjoyed by the adjoining residences immediately east of the proposed facility. The proposal would therefore be inconsistent with the purpose of the *Rural zone code*, and Overall Outcome 2(l), which is listed below.

- (l) *the built form of development integrates with and complements the predominant rural character intended for the zone and sensitively responds to the environmental and topographic features of the landscape.*

#### Woombye local plan code

The purpose of the *Woombye local plan code* is to provide locally relevant planning provisions for the assessment of development within the Woombye local plan area. Figure 7.2.26A of the *Woombye local plan code* below depicts the site's location within the local plan area, noting that the northern boundary of the site is mapped as containing Character Vegetation and adjoins Paynters Creek (a Local Ecological Linkage).



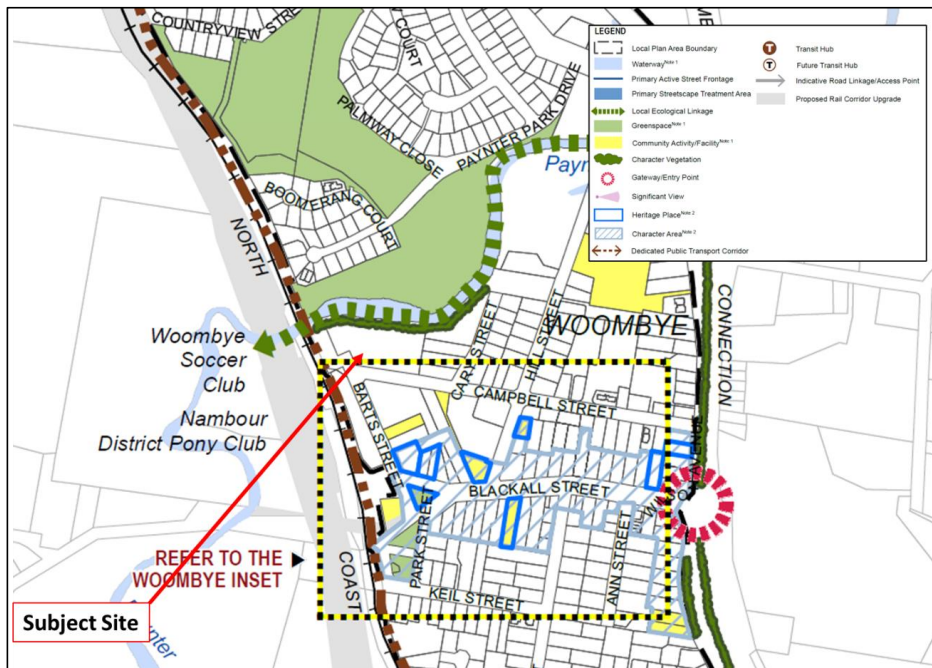


Figure 17: Extract of Figure 7.2.26A of the Woombye Local Plan Code (Woombye local plan elements)

Acceptable Outcome AO1.2 of the code states:

**AO1.2** “Buildings and structures incorporate traditional external building materials, such as timber cladding and corrugated iron roofs.”

The proposed development is telecommunications infrastructure and therefore cannot readily incorporate traditional building materials. As such, assessment against Performance Outcome PO1 is required, which states:

**PO1** “Development provides for buildings, structures and landscaping that is consistent with and reflects the traditional streetscape and architectural character of Woombye in terms of scale, siting, form, composition and use of materials.”

As noted, it would be difficult for the development to be designed in a traditional architectural manner given that is infrastructure. It is considered that the related Overall Outcome 2(c) is more pertinent to the proposal, which states:

**2(c)** “Development retains important built form, streetscape, landscape character and natural environment elements that contribute to the character, setting, and identity of Woombye as a rural town with a strong sense of place and associations with the past.”

As discussed above in the *Rural zone code* and Strategic framework sections, the proposal is likely to have an adverse impact on the visual amenity presently enjoyed by surrounding residential uses and thus would not positively contribute to both the residential

and rural character intended for the area. It is therefore considered that the proposal would not achieve Overall Outcome 2(c) of the *Woombye local plan code*.

In relation to the mapped Character Vegetation element, Acceptable Outcome AO2.3 states:

**AO2.3** “Development provides for the retention and enhancement of existing mature trees and character vegetation contributing to the vegetated backdrop and streetscape character of the local plan area, including where identified on **Figure 7.2.26A**. Note—in some circumstances, the eradication of weed species and planting of locally native species that make a comparable contribution to local character may also satisfy the Acceptable Outcome.”

To ensure this outcome is achieved, Council’s Landscape Officer has recommended conditions to be implemented in the event of an approval being issued, which would require the retention of existing endemic trees and the removal of weed species in accordance with the invasive plants listed in the *Biosecurity Act 2014* and the *Sunshine Coast Local Government Area Pest Management Plan 2012-2016*.

Additionally, in relation to the mapped Local Ecological Linkage, assessment against Performance Outcome PO6 (with no corresponding Acceptable Outcome) is required and is as follows:

**PO6** “Development on land with frontage to Paynter Creek, or on land otherwise identified as a local ecological linkage on **Figure 7.2.26A (Woombye local plan elements)**, facilitates the provision of the local ecological linkage.”

As discussed above, in the event of an approval the proposal could be conditioned to ensure the ecological linkage is maintained/enhanced.

#### Telecommunications Facility Code

The purpose of the *Telecommunications facility code* is to ensure that telecommunications facilities are developed in a manner which protects public health, the environment and the amenity of surrounding premises.

An assessment of the Performance Outcomes and Acceptable Outcomes of the Code, and where relevant, the Overall Outcomes, is provided below.

#### Proximity to residential uses and public spaces

The following Overall Outcome, Performance Outcome and Acceptable Outcome relate to proximity to residential uses and public spaces, and consequential impacts upon visual amenity.

##### **Overall Outcome 2(a)**

“a telecommunications facility does not adversely affect the amenity of surrounding premises.”

##### **Performance outcome PO1**

“The telecommunications facility is located so as to minimise any adverse impacts on the amenity of nearby residential uses and public spaces.”

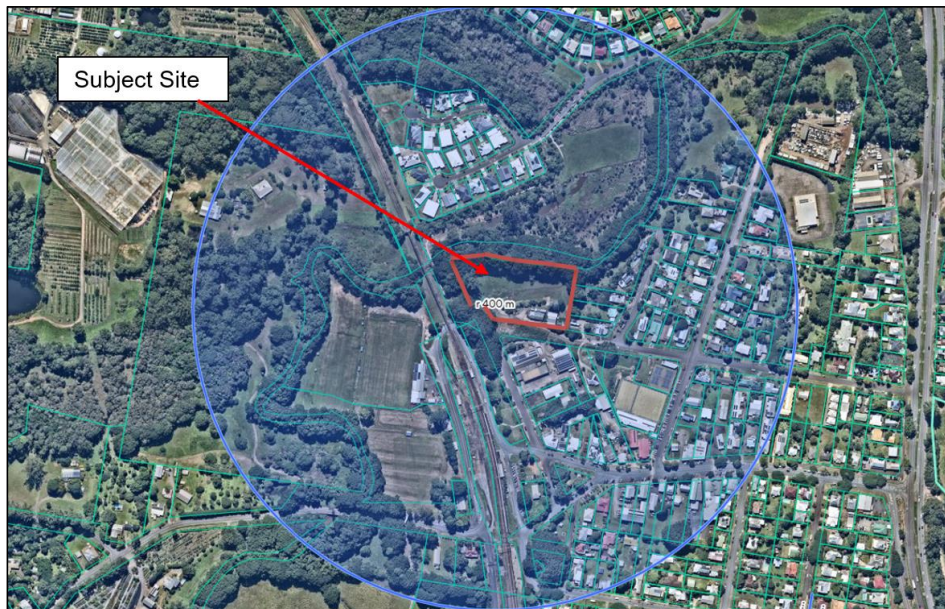


**Acceptable Outcome AO1**

*"The telecommunications facility is located at least:- (a) 400 metres from any residential use, or park; and (b) 20 metres from any public pathway."*

Comment:

As shown in the figure below, the proposed facility is within 400 metres of more than 100 residences, preventing it from achieving the acceptable outcome described in AO1 of the *Telecommunications facility code*. The closest dwellings are located approximately 100m to the east on Cary Street, 140m to the north in a residential estate and 116m south-east of the subject location.



*Figure 18: 400m radius from proposed facility*

As the proposed facility cannot adopt Acceptable Outcome AO1 as its complying solution, the proposal is required to be assessed against Performance Outcome PO1. PO1 of the *Telecommunications facility code* requires that the telecommunications facility be located so as to minimise any adverse impacts on the amenity of nearby residential uses and public spaces.

The visual impact of the proposed facility on nearby residential uses has been assessed by viewing the proposed tower in Council's 3D model software. Sunshine Coast Council's Urban Design Specialist has inserted the proposed tower into the 3D model of the area to ascertain points from which the tower would be visible. The analysis includes features such as:

- Light detection and ranging (LiDAR) point cloud;
- Wide angle views;
- Directional arrows; and

- Colour coding arrows for view impact, with white being least impacted and red being the worst impacted.

Council's 3D model view analysis includes data from Council's Aerial Laser Survey of 2022, in the form of a point cloud model. The point cloud model, which is represented in images as floating points, represents reflections of physical objects in the location where they were measured by the survey. While not as complete as physical models, the point cloud provides a good representation of the extent of objects and vegetation that can be seen by each vantage point.

Council's 3D model view analysis includes an additional image for each vantage point to provide a complementary wide angle view to each image. The main 'Natural View' images in the 3D model view analysis represent an image taken with a 35mm film camera with a 50mm lens, this is widely considered to provide a magnification which closely resembles the view as seen by the naked eye. The 'Wide Angle' views provide additional context to the main views.

A Vantage Point Key Map is shown below with arrows indicating public and private vantage points. All areas/properties within the yellow circle (400m radius) were analysed for views. Where there was evidence that a view might be possible, it was tested in the 3D model. For completeness, where there are no arrows, there was no evidence that a view of the proposed facility would be possible, however it can't be definitively concluded that there was no view in these locations due to the infinite number of possible locations/view angles and not all of these can be practically tested. The colour coded arrows indicate views from which the proposed tower can be seen, with severity of view impacts being as follows:

- White = no discernible impact
- Yellow = minimal degree of impact
- Orange = moderate degree of impact
- Red = high degree of impact

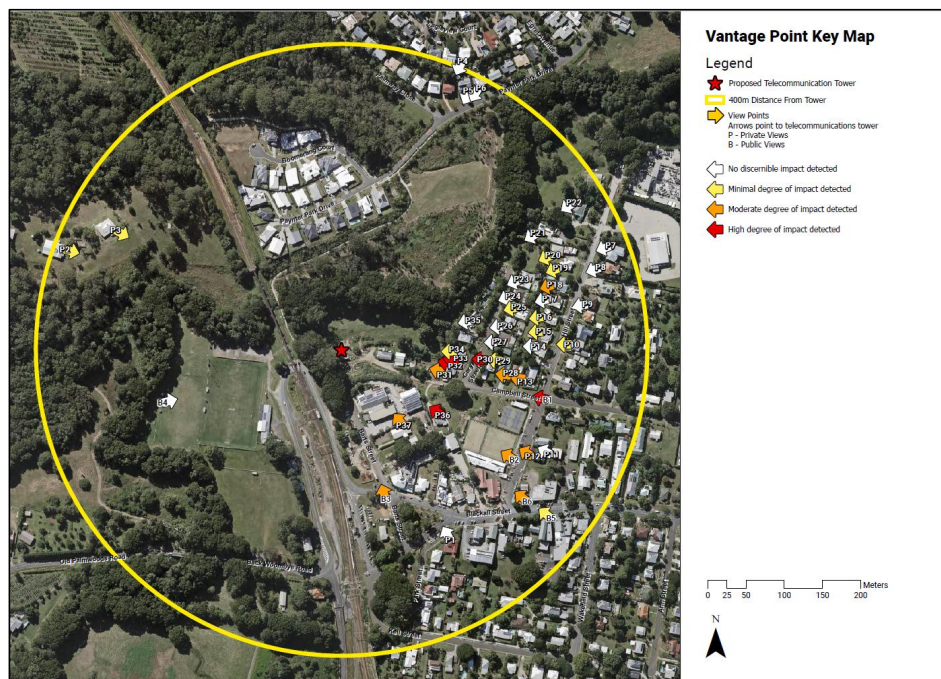


Figure 19: Vantage Point Key Map

The 3D analysis shows that from some public viewpoints and from many private viewpoints, in particular, residential viewpoints, the proposed Telecommunications facility would be clearly visible and not integrated with the surrounding visual landscape and vegetated background. Extracts from the 3D analysis are provided below.





Figure 20: Council 3D Modelling Private View 12 - 6 Hill St



Figure 21: Council 3D Modelling Private View 13 - 19-21 Hill St

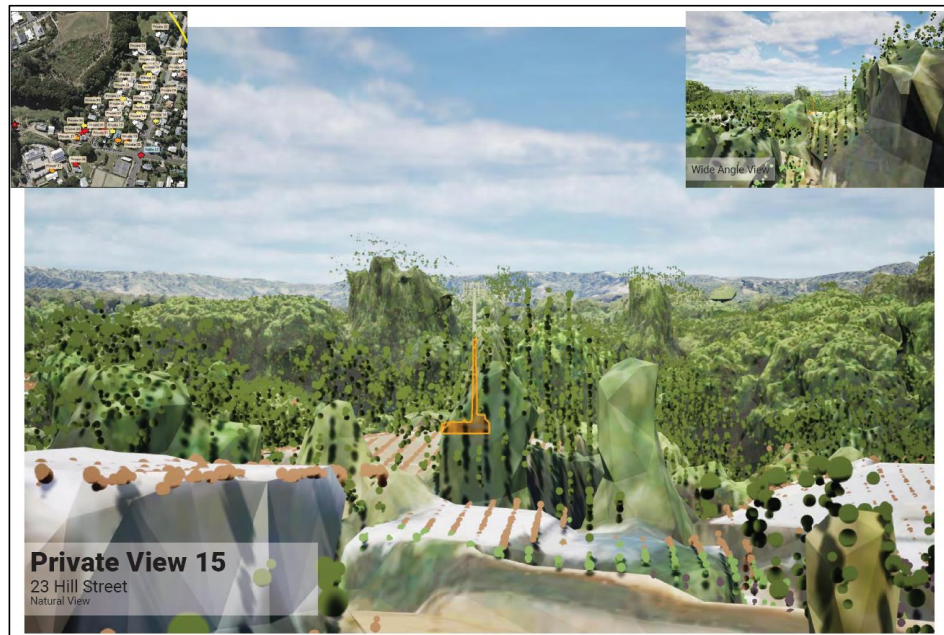


Figure 22: Council 3D Modelling Private View 15 - 23 Hill St



Figure 23: Council 3D Modelling Private View 16 - 25 Hill St





Figure 24: Council 3D Modelling Private View 18 - 31 Hill St



Figure 25: Council 3D Modelling Private View 19 - 33 Hill St



Figure 26: Council 3D Modelling Private View 30 - 19 Campbell St

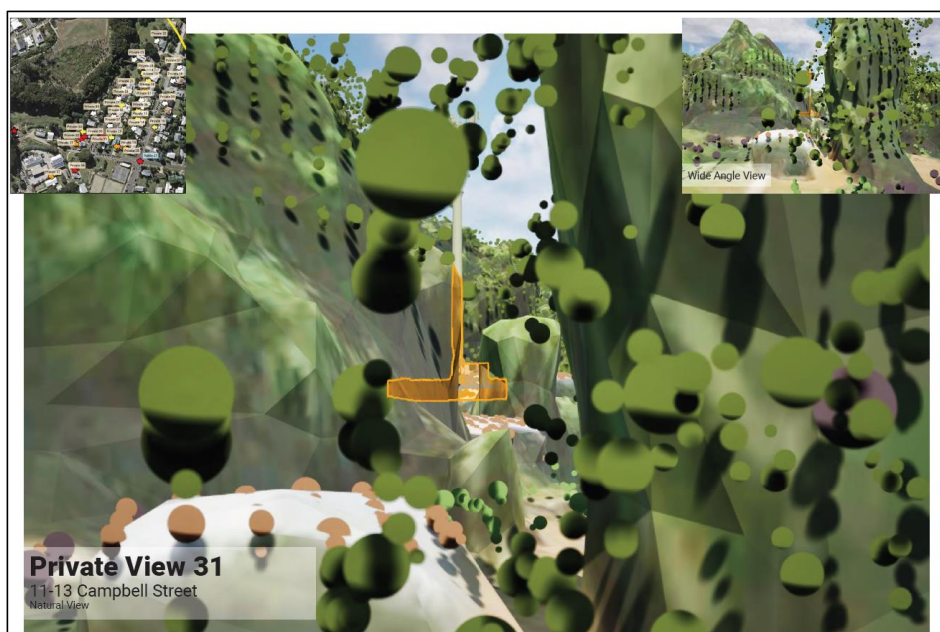


Figure 27: Council 3D Modelling Private View 31 - 11-13 Campbell St





Figure 28: Council 3D Modelling Private View 32 - 11-13 Campbell St



Figure 29: Council 3D Modelling Private View 33 - 3 Cary St

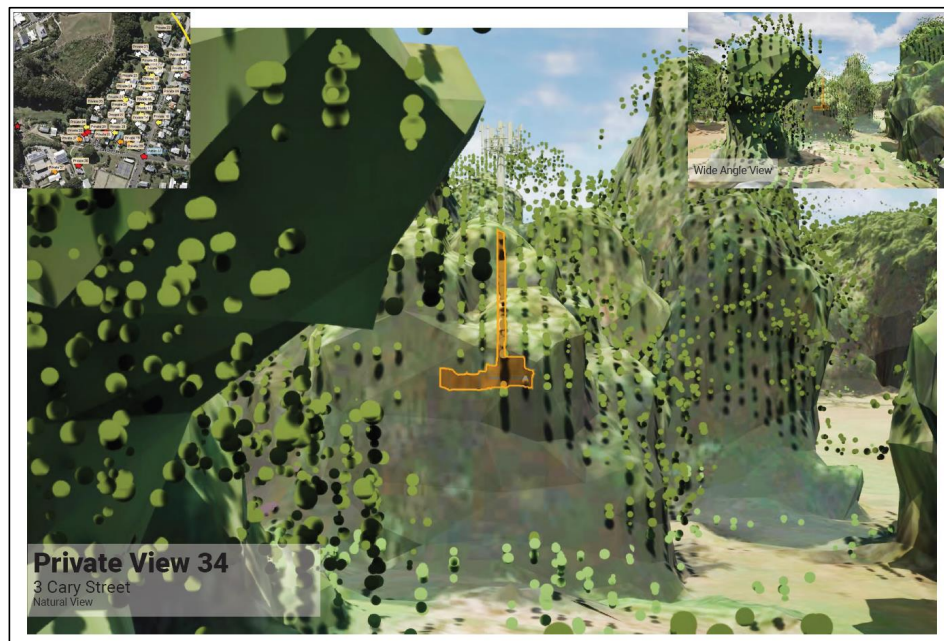


Figure 30: Council 3D Modelling Private View 34 - 3 Cary St

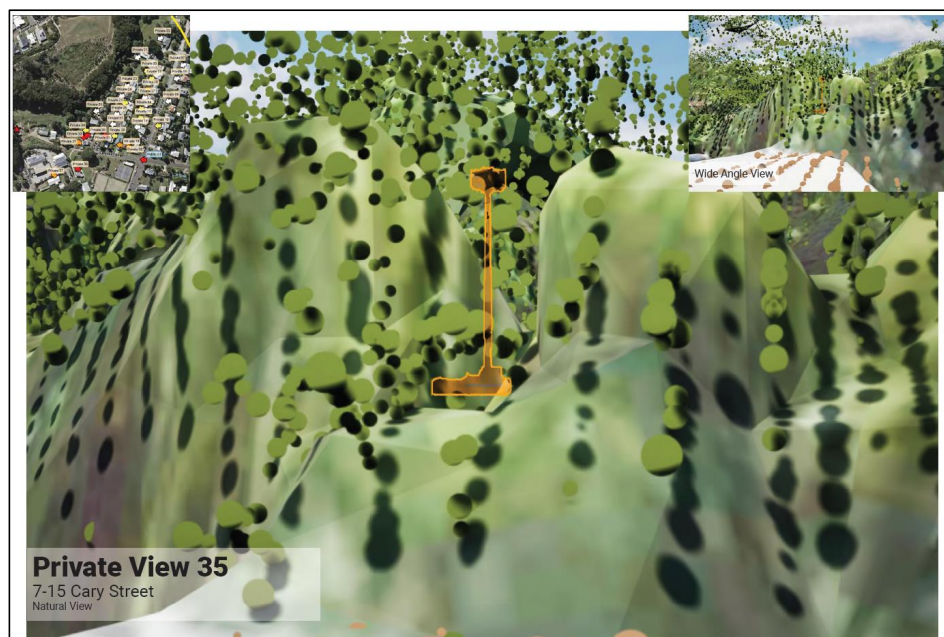


Figure 31: Council 3D Modelling Private View 35 - 7-15 Cary St



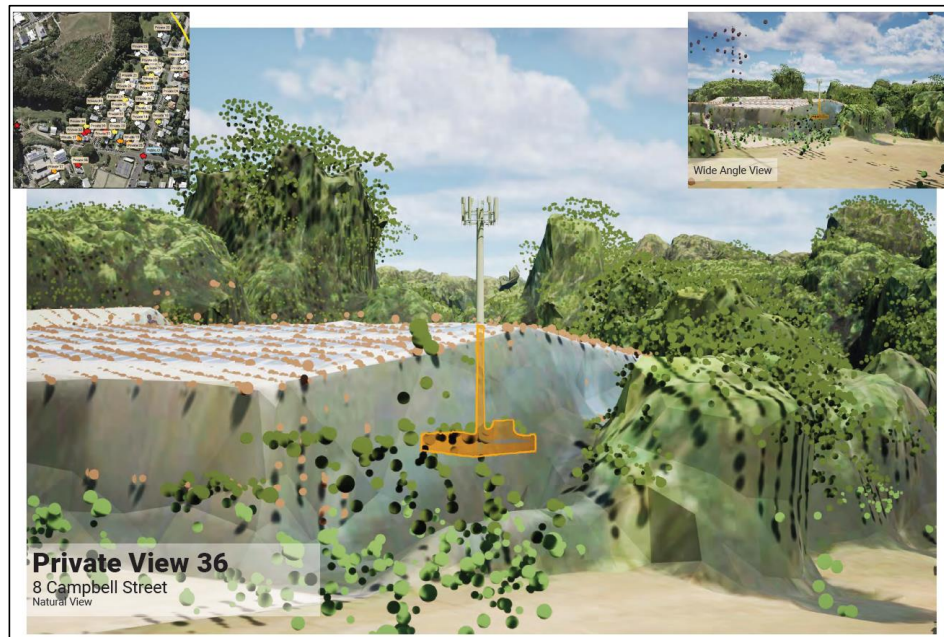


Figure 32: Council 3D Modelling Private View 36 - 8 Campbell St



Figure 33: Council 3D Modelling Public View 01 - Corner of Campbell St & Hill St



*Figure 34: Council 3D Modelling Public View 03 - Corner of Barts St & Blackall St*

In response to Council's 3D Modelling, the applicant provided a "Digital Photography and Photomontage Methodology Report" Prepared by Mark Elliott Illustrations.

Extracts from the applicant's report are included below. These are all public views.





**Figure 35: Applicant's Visual Assessment Photomontage - Bowls Club**



**Figure 36: Applicant's Visual Assessment Photomontage - Corner of Barts St & Blackall St**

Following a review of this report, Council's Urban Design Specialist concluded that the photomontages submitted by the applicant are considered to be accurate and closely reflect the findings of Council's 3D Model View Analysis. However, the number of vantage points is significantly reduced in comparison to Council's extensive range. Furthermore, the location of the provided vantage points is limited to the public realm.

The ability of Council to simulate the experience of residents from their private property, from within Council's 3D model, allows for a detailed assessment to be undertaken against Performance Outcome PO1 of the *Telecommunications facility code*, which seeks that *"The telecommunications facility is located so as to minimise any adverse impacts on the amenity of nearby residential uses and public spaces."* Due to their location in the public realm, the photomontages provided by the applicant can only provide an ambiguous sense of the impacts which would be felt by the residents within their dwellings. It is the private residential views sourced from Council's 3D model view analysis which illustrate the adverse impacts on the amenity of nearby residential uses, and which demonstrate, in Council officers' opinion, that the proposal would not achieve PO1 of the code.

As the images above show, the majority of residences impacted the greatest are from dwelling houses located to the east on Campbell Street and Cary Street. Residents of these streets would likely be able to see the proposal from their windows, balconies and private open spaces. The topography of the area surrounding the proposed facility causes many of these residences to look towards it because land slopes down/away from Hill Street to the east of the site towards the site. Although established vegetation and buildings prevent the tower from being visible to some properties, more than 19 residences were found to be capable of viewing portions of the proposed tower, with most of these residences located within 300 metres of the facility. In addition to being visible to some properties, residents of Cary Street would have direct views of the tower when travelling home along Campbell Street. It is important to note that during the public notification period, submissions were received from residents on both Campbell Street and Cary Street, citing that visual impacts to their properties would be unacceptable, including residents of properties referenced in Private Views 30-34 and 36. Council has mapped the location of submitters and an extract from that map, identifying the location of submissions within 400m of the facility, is included in the figure below.



Figure 37: Submitters within 400m of subject site

The proximity of the proposed facility to dwellings and public places in conjunction with the topography of the surrounds prevents the proposal from being capable of minimising adverse visual impacts on the amenity of nearby residential uses. As such, it is considered that the proposal does not meet Overall Outcome 2(a) and Performance Outcome PO1 of the *Telecommunications facility code*.

#### Visual Amenity and Landscape Character

The following Overall Outcome, Performance Outcome and Acceptable Outcomes relate to visual amenity and landscape character and setting more broadly.



**Overall Outcome 2(b)**

*"a telecommunications facility is integrated with its natural, rural or townscape setting and does not detract from the visual amenity of scenic routes."*

**Performance Outcome PO2**

*"The telecommunications facility is integrated with its natural, rural or townscape setting and is not visually dominant or obtrusive."*

*In partial fulfilment of Performance Outcome PO2*

**Acceptable Outcome AO2.1**

*"The telecommunications facility:-*

- (a) is of a similar height to surrounding structures or vegetation;*
- (b) has a colour and finish that reduces visual recognition in the landscape; and*
- (c) is unobtrusive when viewed from any scenic route identified on a Scenic Amenity Overlay Map."*

**Acceptable Outcome AO2.2**

*"The telecommunications facility is located at least 1 kilometre from any other existing or approved telecommunications facility."*

**Acceptable Outcome AO2.3**

*"Any building associated with the telecommunications facility is setback from any street front boundary a distance at least equal to the front setback required for the adjoining use."*

**Acceptable Outcome AO2.4**

*"A 3 metre wide landscape strip is provided between any building associated with the telecommunications facility and any street front boundary or adjoining use."*

Comment:

The proposed facility generally achieves the outcomes described in AO2.1 of the *Telecommunications facility code*, in that it is of a similar height to surrounding vegetation, it can be conditioned to have a colour and finish which reduces visual recognition, and is unobtrusive when viewed from the scenic route. However, it is considered that the facility would not achieve PO2, as it is not integrated with its setting when viewed from all locations it is visible to and is considered to be visually obtrusive from some locations (note that achievement of AO2.1-AO2.4 only partially fulfills PO2).

The proposal would be located approximately 2 kilometres from the nearest Telecommunication Facilities, therefore adopting the Acceptable Outcome AO2.2 solution of the Code.

With regards to Acceptable Outcome AO2.3 of the Code, the subject site adjoins residential uses which would require a minimum 4.5m setback to the road and minimum 1.5m setback to any side or rear boundary. The proposal would be set back less than this from the road reserve (3m) as such would not adopt the solution offered by Acceptable Outcome AO2.3.

With respect to landscaping, the proposal could be conditioned to adopt Acceptable Outcome AO2.4.

As the Acceptable Outcomes are only partial fulfilment of Performance Outcome PO2, assessment against the corresponding Performance Outcome is required.

The visual impact assessment and supplementary visual amenity advice provided by Larchus have been submitted by the applicant as a means of demonstrating that the proposal would not result unreasonable visual impacts from the surrounding residential areas. The application also proposes the planting of screening species on the site to ameliorate any perceived loss of visual amenity. The images within the applicant's visual impact assessment and supplementary visual amenity advice, superimpose the proposed tower onto photographs taken by residents from their viewpoints used in submissions to the development application. For example, the image below (Figure 38) presents a wide angle view. A wide angle view is not regarded as representing how items in a landscape are perceived because, by including a broader view, individual items are made to appear as further away and therefore viewed smaller. Standard practice for visual impact assessment reports is to use the equivalent of a 50mm lens on a 35mm film camera. This lens sits between wide angle and telephoto lenses and is considered to represent items in a view as they are perceived by the naked eye. In comparison, the images prepared by Council's 3D model provide a natural view, in terms of magnification, of the scale of the proposed telecommunications facility and depict what would be visible with a 50mm lens on a 35mm film camera. Refer to Figure 39 which an equivalent view in Council's 3D model.



Figure 38: (Above) Figure 2 of Larchus Supplementary Visual Amenity Advice - "Composite image of proposal from northern end of west-facing verandah at 19 Campbell St (approximately 195m east of proposal), looking west."

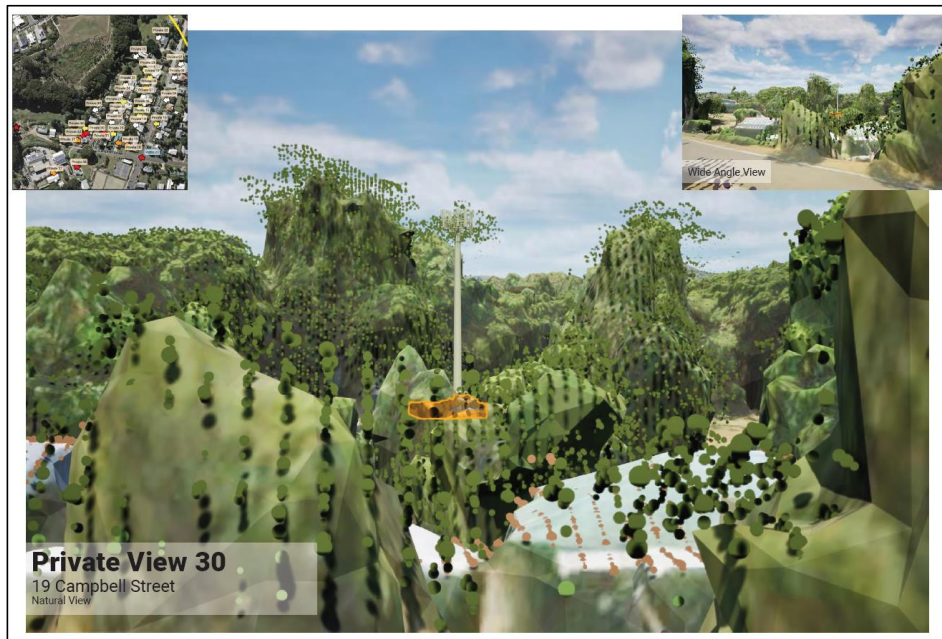


Figure 39: Council 3D Modelling Private View 30 - 19 Campbell St

Overall Outcome 2(b) of the Code requires a similar outcome to Performance Outcome PO2 of the Code. The figures immediately above and the extracts from Council's 3D Modelling combine to demonstrate that the development would in fact create tangible impacts, considering the visual amenity of neighbouring residential sites would be affected, exacerbated due to the infrastructural nature of the development not integrating with the leafy hinterland town character.

In conclusion, it is considered that the proposal would be visually dominant when viewed from a number of adjoining and surrounding properties and would not be integrated with its setting. Accordingly, it is considered that the proposal would not achieve Overall Outcome 2(b) and Performance Outcome PO2 of the *Telecommunications Facility code*.

#### Health and Safety

Acceptable Outcome AO3 of the Code requires that the Telecommunications Facility is designed and operated to restrict human exposure to electromagnetic radiation in accordance with the *Radio Communications (Electromagnetic Radiation – Human Exposure) Standard 2003*, and, the *Radio Protection Standard for Maximum Exposure Levels to Radiofrequency Fields*.

The standards referenced in Acceptable Outcome AO3 have been superseded by the *Standard for Limiting Exposure to Radiofrequency Fields – 100 KHz to 300 GHz' (RPS S-1)* developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), a federal government agency.

In response to Council's Information Request, the applicant submitted an indicative electromagnetic energy (EME) report. Referring to the figure below, the report concluded

that the maximum electromagnetic energy levels 100-300m from the facility are expected to represent 1.38% of the Australian Standard, where facilities operating at up to 100% of the limit set by the standard are considered to meet the standard. The proposal therefore adopts Acceptable Outcome AO3 solution of the Code and achieves compliance.

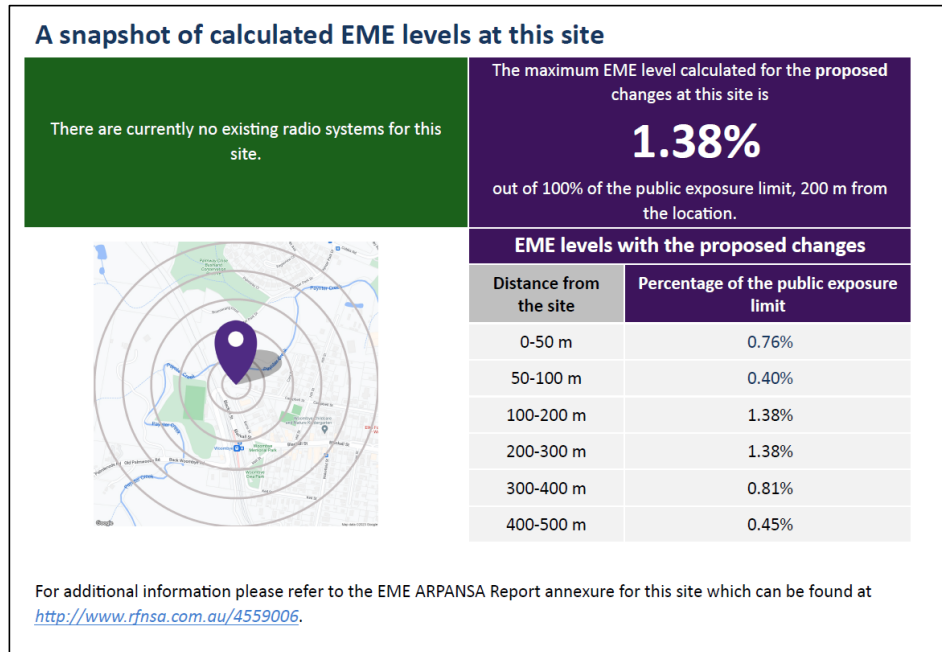


Figure 40: Environmental EME Report for 9 Campbell St

Acceptable Outcomes AO4.1 and 4.2 of the Code seek to ensure that security fencing is provided around the facility, in addition to safety and warning signage. Should the application be approved, fencing and signage could be conditioned, therefore adopting the Acceptable Outcomes as compliant solutions.

#### Facility co-location

Acceptable Outcome AO5 of the Code seeks to ensure that the structural elements of the Telecommunications Facility be designed to support co-masting or co-siting with other carriers. The applicant has advised that the proposed facility has been specifically designed to facilitate co-location of at least one (1) other carrier, therefore adopting the Acceptable Outcome to achieve compliance.

#### Summary of Telecommunications Facility Code Assessment

The stated purpose of the Telecommunications Facility Code is *to ensure telecommunications facilities are developed in a manner which protects public health, the environment and the amenity of surrounding premises.*

The purpose of the code is achieved by meeting the Overall Outcomes of the code. As discussed in the previous sections, it is considered that the proposed Telecommunications

facility would not meet Overall Outcome 2(a) of the code because the proposal would have a significant adverse impact upon the amenity of adjoining and surrounding premises, particularly residential premises located on Cary Street and Campbell Street. Furthermore, it is considered that the proposed Telecommunications facility would not meet Overall Outcome 2(b) of the code because the proposal would not be integrated with its setting.

Given that the proposal does not accord with the Purpose and Overall Outcomes of the *Telecommunications facility code*, the proposal is considered to be in conflict with the *Sunshine Coast Planning Scheme 2014*.

Prescribed development codes

- *Nuisance Code* – Council's Principal Environment Officer has advised that in the event of an approval, the proposal can comply with the code with the inclusion of conditions requiring noise impacts to be certified to meet *Nuisance code* requirements.
- *Stormwater management code* - Council's Principal Development Engineer (Hydraulics) has advised that the proposal results in a minimal change in the impervious area of the site or change in ground surface levels. The site discharges directly to Paynters Creek which is a lawful point of discharge. In the event of an approval, stormwater can be conditioned to be disposed of onsite.

**Planning Scheme Assessment Conclusion**

As discussed in this report, the proposed Telecommunications facility would be highly visible from numerous residential properties in close proximity to the site. As such, the proposal is considered to be inconsistent with the following outcomes of the Strategic Framework and the planning scheme codes:-

- Part of Strategic Outcome 3.6.1(b) and Specific Outcomes 3.6.2.1(e), 3.6.2.1(i) and 3.6.7.1(c) and Strategic Outcome 3.8.1(g) of the Strategic Framework;
- The Purpose and Overall Outcome 2(l) of the *Rural zone code*;
- The Purpose and Overall Outcome 2(c) and Performance Outcome PO1 of the *Woombye local plan code*; and
- The Purpose and Overall Outcomes 2(a) and 2(b), and Performance Outcomes PO1 and PO2 of the *Telecommunications facilities code*.

In light of these conflicts, and in accordance with the *Planning Act 2016*, Council needs to consider if there are other relevant matters (such as an overriding need in the community interest) that would justify an approval of the application.

The applicant submitted coverage maps (refer to Figures below) indicating that there is a reception gap and that the proposal development would improve Optus mobile coverage (and coverage for any other carrier that decides to collocate on the facility) in the area. The applicant's analysis concluded that "*approximately 348 dwellings or approximately 1000 people would receive medium-high levels of indoor coverage*", in addition to businesses in the area and visitors to the area. As such, the proposal would result in a benefit to the community.



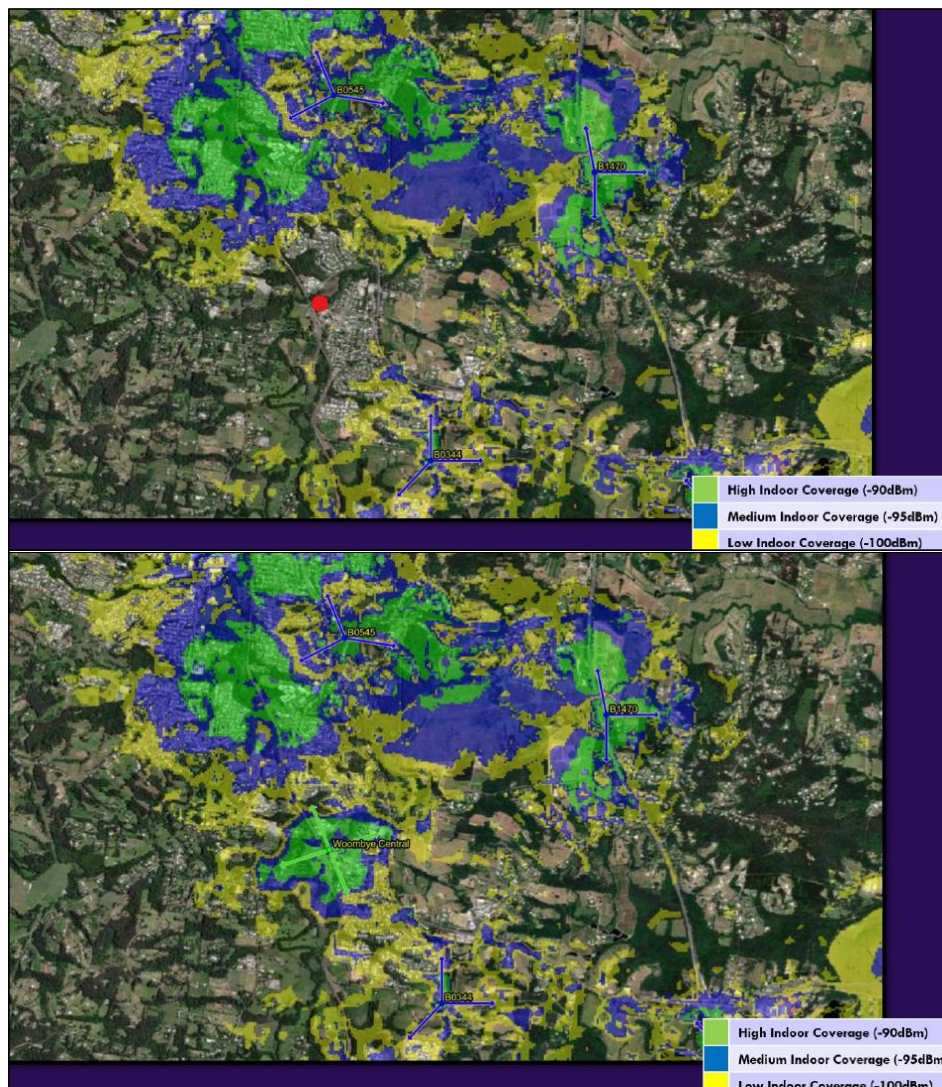


Figure 41: Predicted Optus coverage improvements from the proposed facility

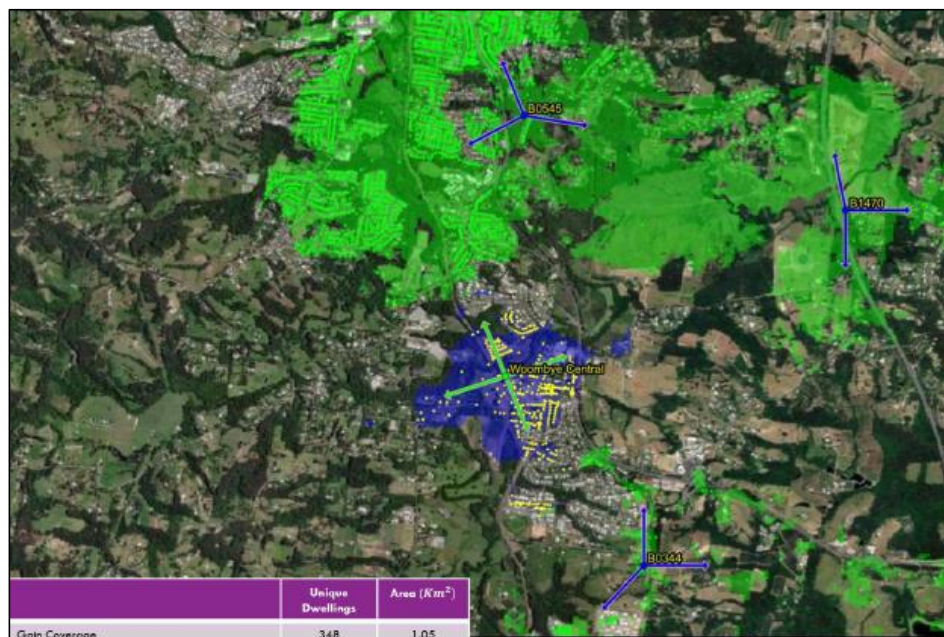


Figure 42: Predicted Optus coverage improvements - dwelling analysis

However, recognising the potential community benefits that the proposed development could provide does not clearly demonstrate a community need. This is evident in the fact that over 400 submissions, including 6 petitions with over 200 signatures, were received opposing the proposal, from residents who would ultimately benefit from the infrastructure were the application to be approved. The Figure below illustrates that all submitters within 400m of the subject site oppose the proposed development, while two submitters in the Woombye area have expressed support for the proposal.



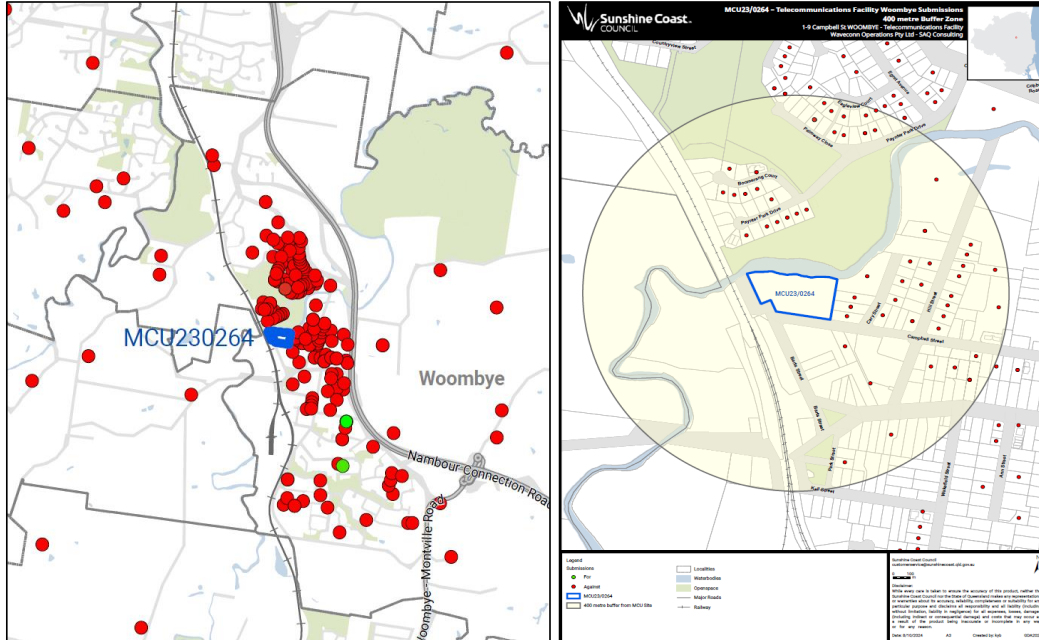


Figure 43: Woombye area Submitter Map (Left) and 400m Buffer Submitter map (Right)

It is therefore considered that the proposal has not demonstrated sufficient grounds in the public interest/planning need to justify or override the identified conflicts with the Planning Scheme. Had Council received a large number of submissions in support of the proposal from residents and businesses located within the predicted coverage area, then the weighting of the benefits versus the conflicts with the planning scheme would be more finely balanced. As such, Council received just five (5) submissions (three properly made) in support of the application from residents located within the predicted coverage area. It is therefore considered that the likely benefit to the community associated with improving local network services is outweighed by the significant community opposition to the proposal, and the identified conflicts with the planning scheme are not overcome by a demonstrated overriding need in the community's interest.

As previously mentioned in this report regarding site selection, the applicant investigated ten (10) alternative sites for the facility, located on four (4) properties. The Figure below depicts these alternative sites.

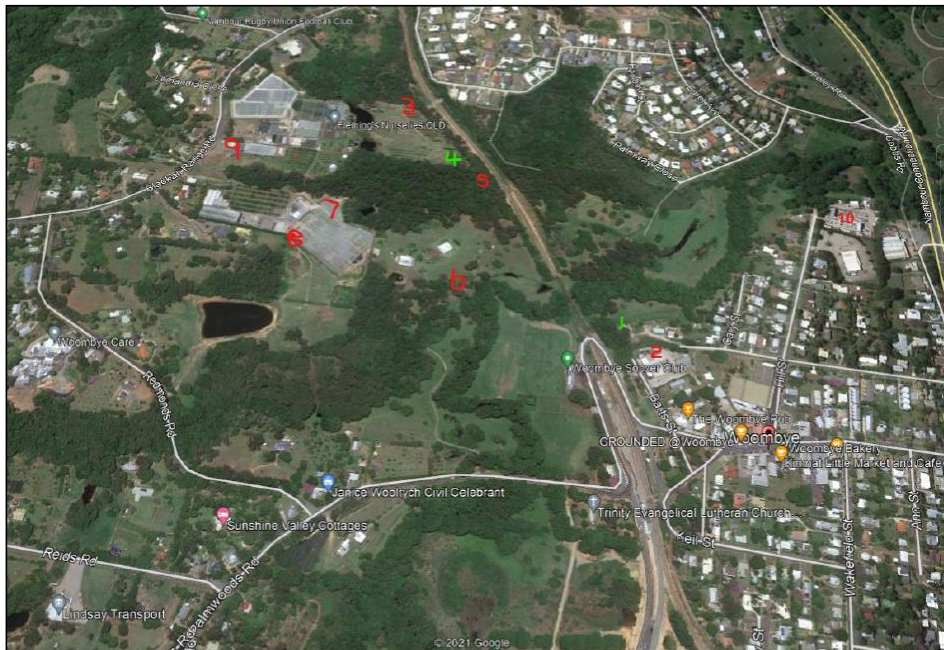


Figure 44: Alternative locations

Seven (7) of these of the alternative sites are located on “Flemings Nursery”, situated at 71-73 and 87 Blackall Range Road and 42 Old Palmwoods Road. Two of the ten (10) sites were deemed suitable by the applicant for the proposed tower, being the subject site and location 4 situated on Flemings Nursery (shown in green in the figure above). It is noted that the applicant’s alternative locations provided for this application, is identical to the information provided in September 2021 for withdrawn application No. MCU21/0219. In response to Council’s Further Advice Request, the applicant provided the following response:

*“Most of the alternate locations set out in the application material were located on the Flemings Nursery Land. Attached is an email from the Nursery Manager received on 25 November 2024 confirming they remain uninterested in hosting the proposed facility. The potential location at the end of Barts Street is certainly more prominent and visible than the subject site and was dismissed on that basis (a position supported by the public reaction to the less intrusive subject proposal) and the industrial land at the far end of Hill Street was discounted as not being able to meet the technical requirements. As such, Waveconn has re-investigated the alternate locations to a suitable degree and none are available and/or obviously better. No additional locations have been investigated as there are simply no other locations nearby that would present obviously better outcomes, particularly when the zoning of the subject land is suitable and the expert visual impact assessment clearly shows the impacts are not unreasonable (further analysis on this below). Accordingly, I remain of the view the applicant has been sufficiently diligent in its site selection and no other obviously better site is available in the locality, nor has one (that is within the area it is needed) been suggested despite hundreds of objections, which also suggests there simply isn’t one.”*

The applicant's site selection process is acknowledged, and the improvements to coverage are not disputed, however as outlined within this report, it is considered that the proposal in its current form and location would conflict with several outcomes of the planning scheme due to the likely adverse impacts on visual amenity of adjoining and surrounding residential premises. The proposal has been strongly opposed by the community it would benefit. The absence of community support indicates that the existence of an overriding need in the community interest that would overcome the conflicts with the planning scheme, has not been demonstrated.

### **Assessment Benchmarks Related to a Variation Approval**

Not applicable.

### **Assessment Benchmarks Related to a Temporary Local Planning Instrument**

Not applicable.

### **Other Assessment Matters**

In addition to the assessment benchmarks referred to above, the *Planning Regulation 2017* requires that impact assessment must be carried out having regard to:

- the regional plan for a region; and
- the State Planning Policy, to the extent the State Planning Policy is not identified in the planning scheme as being appropriately integrated in the planning scheme.

#### South East Queensland Regional Plan (SEQRP)

The development is located within the Urban Footprint of the SEQRP. Having regard to the SEQRP, the development is consistent with the outcomes expressed and sought to be achieved by the SEQRP.

#### State Planning Policy (SPP)

Since the time the *Sunshine Coast Planning Scheme* commenced on 21 May 2014, a new SPP came into effect on 3 July 2017 and must be considered for development assessment to the extent the SPP is inconsistent with the planning scheme.

The proposal is consistent with the policy intent of the SPP and does not conflict with any of the identified state interests.

### **CONSULTATION:**

#### **Referral Agencies**

The application did not require referral to any Referral Agencies.

#### **Other External Referrals**

The application did not require any other external referrals.

Public Notification

The application was publicly notified for 15 business days between 5 August 2024 and 26 August 2024 in accordance with the requirements of the *Planning Act 2016*. A total of 453 submissions were received, of which 443 were determined to be ‘properly made’ in accordance with the *Planning Act 2016*. Most of the submissions received oppose the proposed development. A map identifying the location of submitters in relation to the proposal is included below, with an additional map showing the location of submitters within a 400m radius from the site.

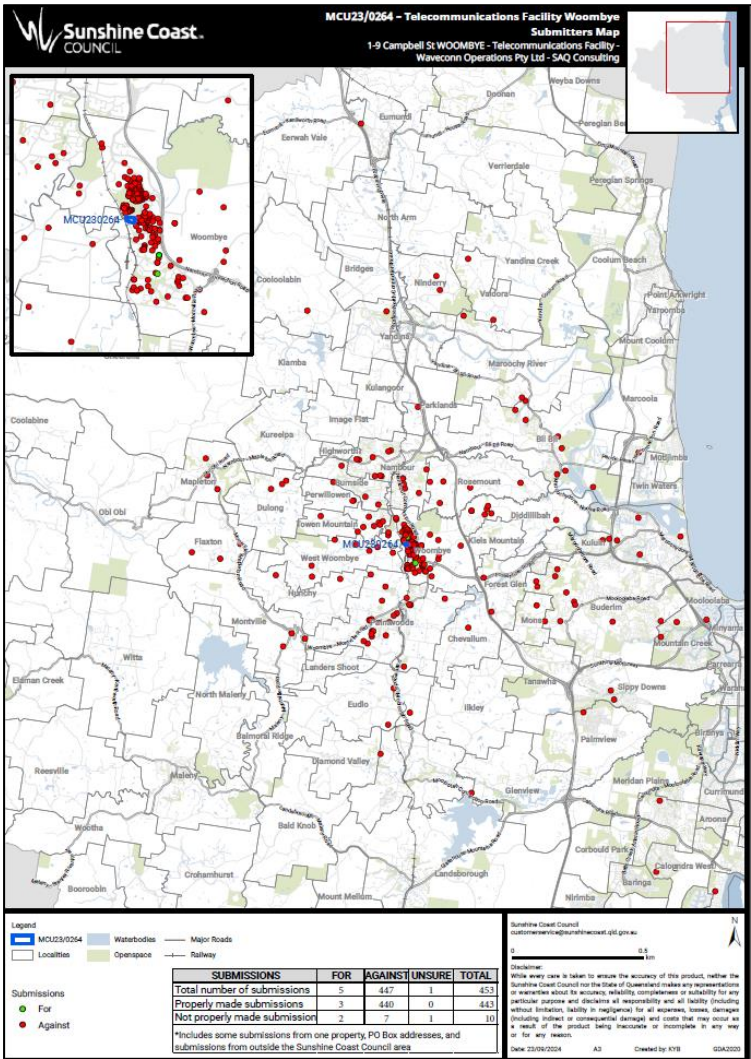


Figure 45: Submitters map



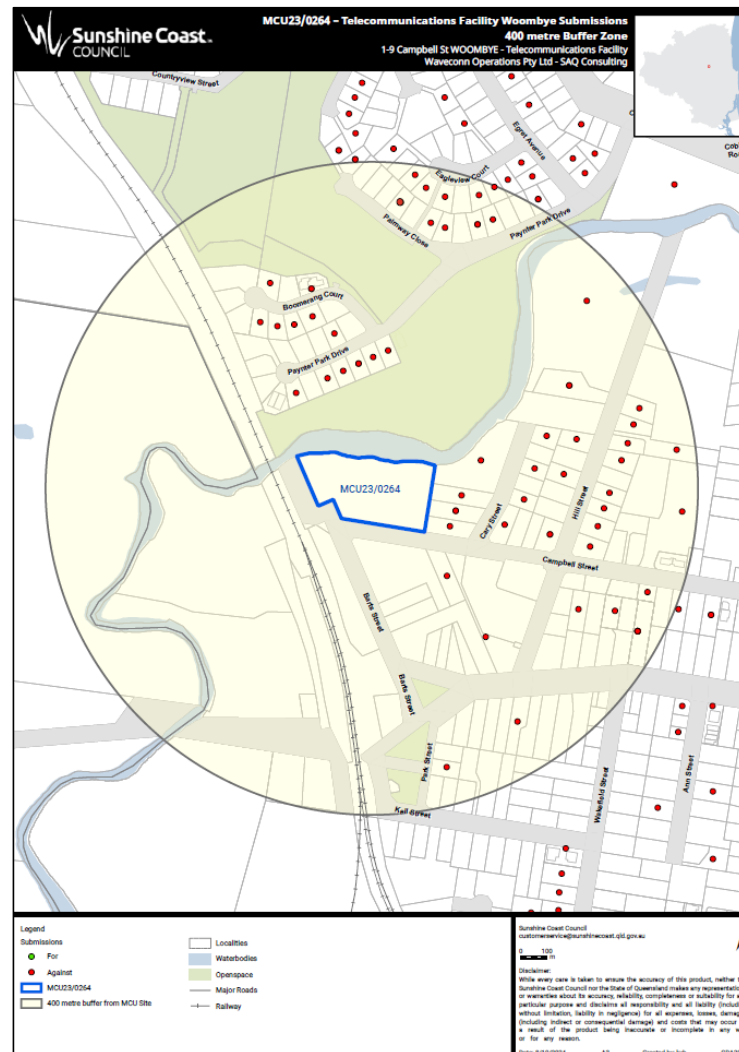


Figure 46: Submitters map with 400m radius

The properly made submissions included 6 petitions, all opposing the development, which contained a total of 253 signatures. Approximately 50 of the signatories for the petitions also lodged individual submissions.

The following table provides a description of the matters raised in submissions received about the application, together with a statement of how those matters were dealt with in reaching a decision.

#### Submissions supporting the development:

A total of 3 properly made submissions support the development.

ISSUES / COMMENTS	COMMENTS
Woombye has poor mobile reception, and some residents cannot get a signal indoors.	The applicant has provided a coverage analysis that demonstrates that if approved, the proposed development would result in an improvement in coverage for Optus customers.
The proposed location / site is the most suitable.	The application has not demonstrated that the proposal has been located so as to minimise impacts on the amenity of nearby residential uses.
The proposed tower hasn't impacted on recent property sales.	The potential for impacts upon property values is not considered in the planning scheme, rather, the scheme seeks to minimise the adverse impacts of development on the existing and planned future character and amenity of an area. In this instance, the application has not demonstrated that the proposal will not have a significant impact on the amenity of the nearby residential properties.
Electromagnetic radiation safety would have been addressed.	<p>The regulation of electromagnetic energy including minimising the risk of exposure to unsafe electromagnetic energy levels is the responsibility of both the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA, an agency of the Commonwealth Department of Health) and the Australian Communications and Media Authority (ACMA).</p> <p>The Australian Radiation Protection and Nuclear Safety Agency establishes the limits at which public and occupational exposure to electromagnetic fields is considered safe. These limits are set out in the <i>Standard for Limiting Exposure to Radiofrequency Fields – 100 KHz to 300 GHz</i> (RPS S-1).</p> <p>The applicant has submitted an indicative electromagnetic energy report based on the usual equipment that is deployed by Optus. The maximum electromagnetic energy levels on the facility are expected to represent 1.3% out of the 100% public exposure limit, 200m from the site. The proposal therefore meets the relevant Australian standard.</p>
Don't see how it would impact people in town.	The application has not demonstrated that the proposal has been located so as to minimise impacts on the amenity of nearby residential uses.

### Submissions opposing the development:

A total of 440 properly made submissions opposing the development.

ISSUES / COMMENTS	COMMENTS
This application is a recycled version of the previous application MCU21/0219.	The previous application was withdrawn by the applicant. The current proposal is a new application. It is noted that the current proposal seeks a height approximately 9m lower than the previous application.
Proposal conflicts with the Strategic Framework / and aspects of the Planning Scheme including the <i>Telecommunications facility code</i> and <i>Height of buildings and structures overlay code</i> .	It is agreed that the proposal does not meet parts of the Strategic Framework and parts of the purpose and Overall Outcomes, the <i>Rural zone code</i> and the <i>Telecommunications facility code</i> .  In accordance with Table 5.10.1 of the <i>Sunshine Coast Planning Scheme</i> , The Height of Buildings and Structures Overlay does not apply to development if involving erecting a structure for a telecommunications tower in the Rural zone.
Visual Impact / Character Impact / Impact to businesses / Amenity Impacts	Council's assessment of the proposal's likely impacts is discussed at length in the detailed assessment report.
Impact on Blackall St Scenic Route	Council's 3D Modelling and the applicant's Visual Assessment Photomontage indicate that when viewed from the identified scenic route on Blackall Street, the proposal is considered to be low-key and unobtrusive due to the presence of electrical infrastructure (power lines) and large mature vegetation
Failure to address strong community opposition. The applicant has made no effort to engage with locals to understand their concerns.	Public notification occurred in accordance with the legislative requirements of the <i>Planning Act 2016</i> and the <i>Development Assessment Rules 2017</i> .  Although additional community consultation is not required under the <i>Planning Act 2016</i> , if the applicant had undertaken additional consultation with the community to understand community sentiment and concerns, this <u>may</u> have resulted in fewer submissions and/or an altered proposal.
Potential street connection Campbell St to Bart St and potential new western Woombye gateway	The proposal is unlikely to impact upon any future road connections.
The height of the proposed tower and the topography of the subject site would affect the tower's effectiveness.	The applicant has undertaken a coverage analysis which concluded that, were the proposal to be approved in its current form



	and location, coverage in the area would be improved.
Electromagnetic radiation safety	<p>The regulation of electromagnetic energy including minimising the risk of exposure to unsafe electromagnetic energy levels is the responsibility of both the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA, an agency of the Commonwealth Department of Health) and the Australian Communications and Media Authority (ACMA).</p> <p>The Australian Radiation Protection and Nuclear Safety Agency establishes the limits at which public and occupational exposure to electromagnetic fields is considered safe. These limits are set out in the <i>Standard for Limiting Exposure to Radiofrequency Fields – 100 KHz to 300 GHz</i> (RPS S-1).</p> <p>The applicant has submitted an indicative electromagnetic energy report based on the usual equipment that is deployed by Optus. The maximum electromagnetic energy levels on the facility are expected to represent 1.3% out of the 100% public exposure limit, 200m from the site. The proposal therefore meets the relevant Australian standard.</p>
The applicant should consider alternate sites.	<p>The applicant investigated ten (10) alternative sites for the proposed facility, located on four (4) properties. Two (2) of the ten (10) sites were deemed suitable by the applicant for the proposed tower, being the subject site and a location on Flemings Nursery. The applicant provided evidence that the owner of Flemings Nursery was not interested in hosting the proposed facility.</p> <p>However, as discussed within this report, the applicant has not sufficiently demonstrated that the proposal, in its current form, on the subject site would, not have a significant impact on the amenity of the nearby residential properties.</p>
Proposed development threatens Woombye's charm, character and tranquil atmosphere	Assessment has concluded that the proposal would not contribute to the character, setting and identity of Woombye as a rural town, and thus has not sufficiently addressed Overall Outcome 2(c) of the <i>Woombye local plan code</i> .

The applicant has not provided any images of the visual impact on the residential properties in the Paynter Park development.	Council 3D modelling has determined that residential properties to the North of the subject site are unlikely to have an adverse visual impact due to the large mature vegetation that is present along Paynter Creek.
Impact on Riparian zone / biodiversity / flooding.	<p>The proposed Telecommunications facility would be located in an already cleared area, well away from the high bank of Paynter Creek and would have limited impact on ecological connectivity. As such, the proposal is consistent with the purpose and Overall Outcomes of the code. If approved, the proposal can be conditioned to comply with the requirements of the code.</p> <p>Council's Principal Development Engineer (Hydraulics) concluded that the proposed telecommunications tower would not result in any adverse flood impacts, and in the event of an approval conditions relating to flood immunity and flood management would be included.</p>
Avian mortality.	Council's Principal Biodiversity Officer has advised that the proposed telecommunications facility is not expected to affect avian mortality. The tower would be a stationary object lacking features that are often linked to bird-strike such as glass or other transparent surfaces, moving parts such as wind turbines or lights that can confuse birds that are active at night and cause them to collide with structures. There is also evidence that some birds, particularly raptors, use telecommunications facilities towers for nesting and perching.
Loss of green space.	The proposed facility is located on private land and would be located in an already cleared area.
May limit density / population growth in the area.	As discussed in this report, the proposed development meets the Strategic Outcomes 3.6.1(a) 3.6.1(b) and 3.6.1(h) in relation to providing the Sunshine Coast with telecommunications infrastructure to meet long-term needs and support growth.
Fails to address heritage character overlay of Woombye.	The site is not included in the Heritage character overlay.

## CONCLUSION:

The proposed development does not comply with, nor can it be conditioned to comply with, the requirements of the Planning Scheme. In particular, the proposed Telecommunications facility conflicts with the outcomes in the Strategic Framework, the *Rural zone code*, the *Woombye local plan code* and the *Telecommunications facility code*, as detailed in the assessment section of this report. There are no other relevant matters applicable to the application that justify approving the proposed development despite the non-compliances described in this report. As such, the application is recommended for refusal.

The application is recommended for refusal for the following reasons:

### Rural character, amenity and landscape values

1. The proposal has not been designed and located to minimise community impacts, in particular, visual amenity on nearby residences.
2. The proposal has not been integrated in a sustainable and attractive manner and therefore would unduly impact upon the character of the local area.
3. The built form of the proposal does not integrate with or complement the predominant rural character intended for the zone.
4. The proposal is not integrated with its natural and rural setting.
5. The proposal would not contribute to the character, setting and identity of Woombye as a rural town.
6. The proposal has not demonstrated achievement of Strategic Outcomes 3.6.1(b) and 3.8.1(g) and Specific Outcomes 3.6.2.1(e), 3.6.2.1(i) and 3.6.7.1(c) of the Strategic Framework of the *Sunshine Coast Planning Scheme 2014*.
7. The proposal has not demonstrated achievement of the following Assessment Benchmarks of the *Sunshine Coast Planning Scheme 2014*:
  - (a) Purpose and Overall Outcome 2(l) of the *Rural zone code*;
  - (b) The Purpose and Overall Outcome 2(c) and Performance Outcome PO1 of the *Woombye local plan code*; and
  - (c) Purpose and Overall Outcomes 2(a) and 2(b) and Performance Outcomes PO1 and PO2 of the *Telecommunications facilities code*.

### Relevant matters

8. The proposed development cannot be conditioned to comply with the assessment benchmarks.
9. The application has not demonstrated that there is an overriding need in the community interest sufficient to justify approval of the proposal despite the conflicts with planning scheme.
10. There are no discretionary matters which warrant approval of the proposed development.



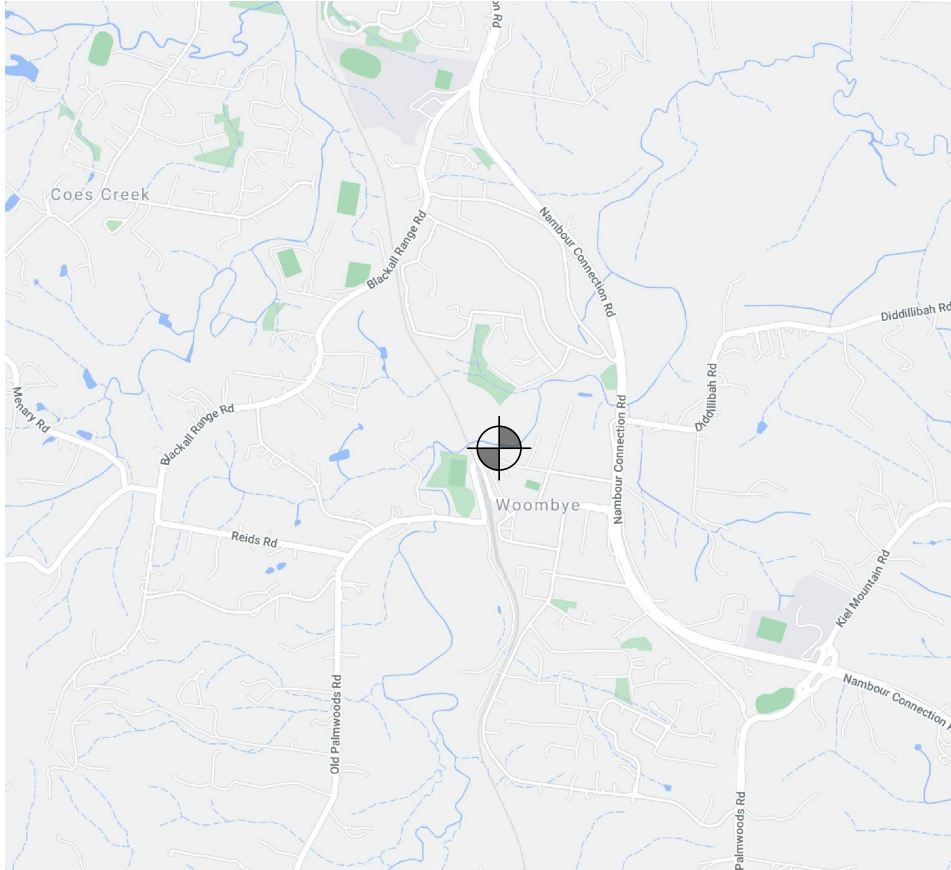
DATE OF ISSUE	16.05.2023	20.10.2023	24.10.2023	11.12.2023	15.12.2023	06.06.2024	24.07.2024		
DRAWING PACKAGE VERSION	1	2	3	4	5	6	7		

DRAWING REGISTER

AQ4559-002 - 00	COVER SHEET + DRAWING REGISTER + LOCALITY PLAN	A-1	B-1	C-1	D-1	E-1	F-1	G-1	
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GENERAL DRAWINGS

AQ4559-002 - G1	DRAFT SITE PLAN	A-1	B-1	C-1	D-1	E-1	F-1	G-1	
AQ4559-002 - G2	DRAFT SITE LAYOUT	A-1	B-1	C-1	D-1	E-1	F-1	G-1	
AQ4559-002 - G3	DRAFT SITE ELEVATION	A-1	B-1	C-1	D-1	E-1	F-1	G-1	



LOCALITY PLAN  
NOT TO SCALE

WOOMBYE CENTRAL

9 CAMPBELL STREET,  
WOOMBYE,  
QLD 4559

SITE ID: AQ4559-002

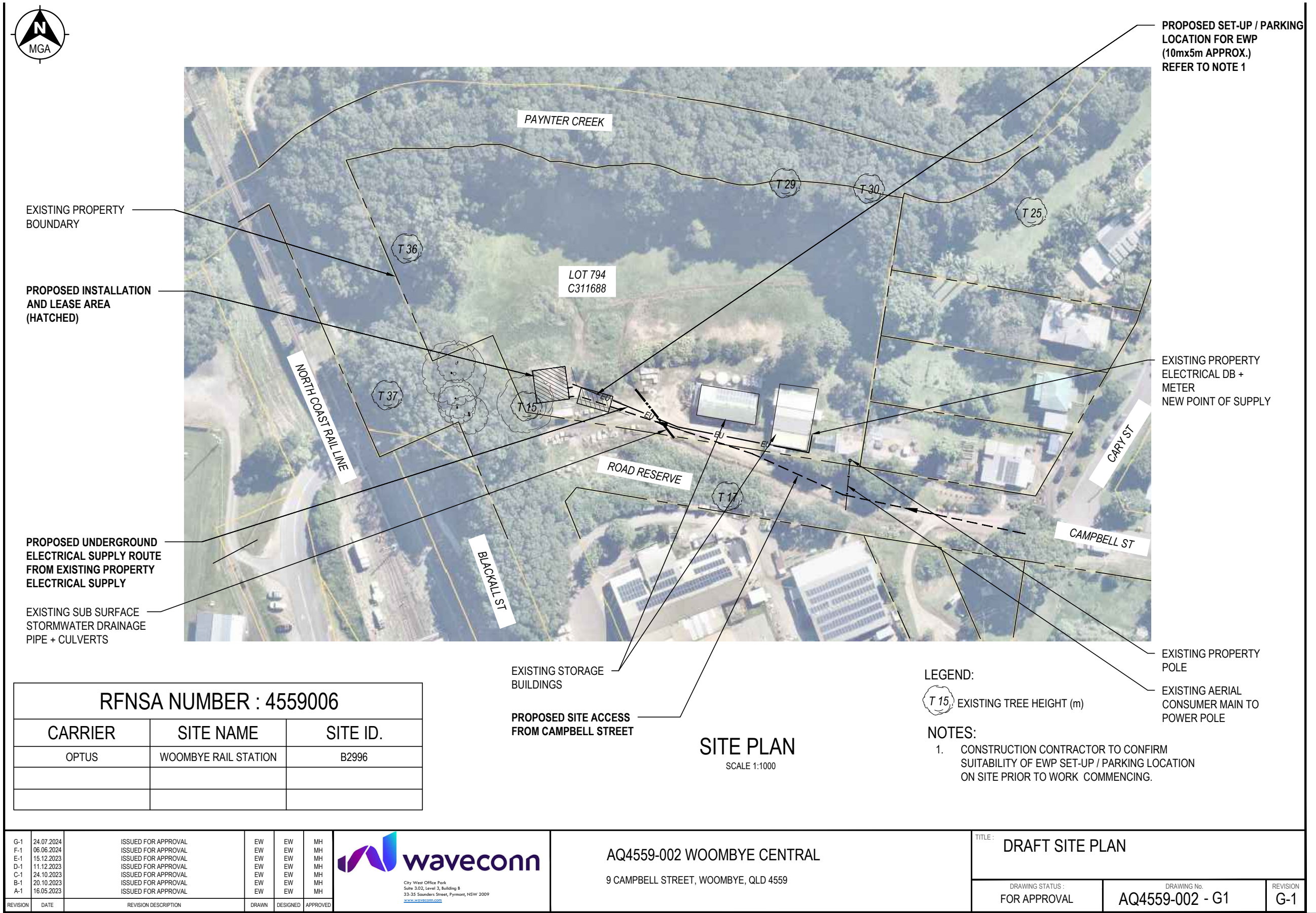


City West Office Park  
Suite 3.02, Level 3, Building B  
33-35 Saunders Street, Pyrmont, NSW 2009  
[www.waveconn.com](http://www.waveconn.com)

FOR APPROVAL

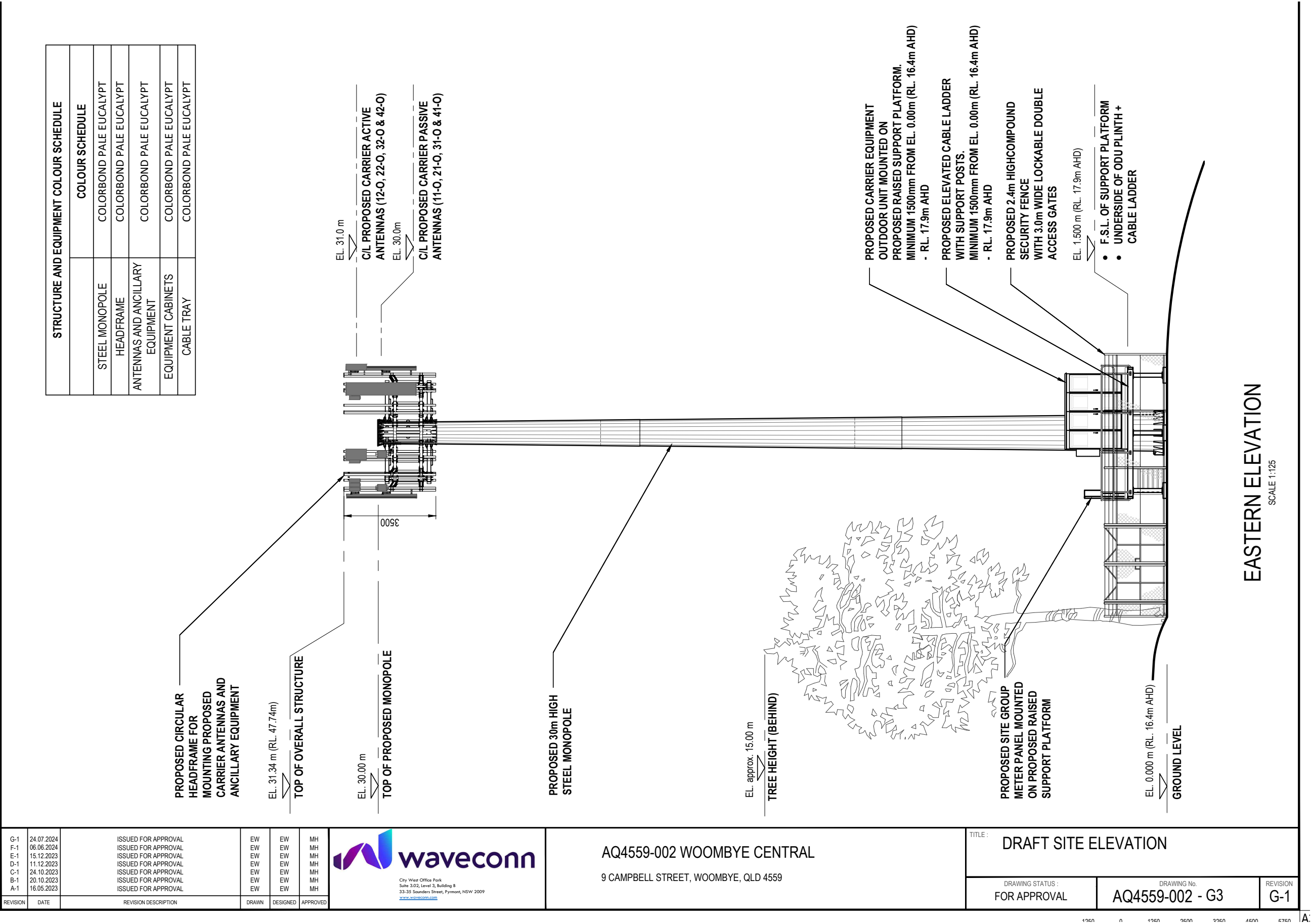
DRAWING No.  
AQ4559-002 - 00













MARK ELLIOTT ILLUSTRATIONS

# Digital Photography and Photomontage Methodology Report

for:

## **Proposed Telecommunications Facility**

at:

9 Campbell Street, Woombye

described as,

Lot 794 on C311688

April 2025

Monday, 28 April 2025

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## Statement

My name is Mark Earnshaw Elliott.

I work at 31 Meta Place Fig Tree Pocket, Queensland.

I have an Associate Diploma Built Environment Technician from the Queensland University of Technology (1984).

I started this architectural illustration practice in 1991. Before this I worked for various architectural businesses in Southeast Queensland and the UK as an architectural draftsman and in-house illustrator, These included:

- Lund Hutton Ryan Morton
- Goodsir Baker Wilde
- Noel Robinson Built Environments
- Robert Cottee Architects
- Media 5

In the United Kingdom;

- Westwood, Piet, Poole and Smart (Haymarket, London)
- Boyer Design Group (Berkshire)

In 1996 I developed a method of preparing survey accurate photomontages using computers and a variety of 3D modelling and photo manipulation software. I use this technique to produce survey accurate realistically portrayed developments to assist visual amenity assessment.

As a sole practitioner I am responsible for the entire production of the photomontages from start to finish. This includes;

- attending briefings
- site meetings and inspections
- liaising with experts and proposal designers
- site photography
- 3D modelling and forensic drawing interpretation from many built environment disciplines. This includes landform modelling and reshaping, proposed built form and landscape concept modelling, civil and structural engineering design modelling, acoustic barrier design interpretation and lighting engineering design.
- 3D model rendering
- digital photo manipulation
- page layout
- reporting

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- providing evidence for the Planning and Environment Court.

My report follows.

Mark Earnshaw Elliott.

31 META PLACE  
FIG TREE POCKET QLD 4069  
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ABN: 45 362 515 586

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## 01 - INTRODUCTION:

1. I have been engaged by the applicant to produce a series of survey accurate photomontages of a proposed telecommunications facility.
2. These photomontages are to assist in visually describing the extent and visibility of the proposed facility from vantage point locations surrounding the subject site.
3. These vantage points were nominated by Mr Powell. His reasons for the selections are explained in his letter in ***Response to Council 3D Modelling pertaining to Proposed Telecommunication Facility located at Campbell Street, Woombye***, dated Sunday, 27 April 2025.
4. The address of this proposal is 9 Campbell Street Woombye.
5. I visited the vantage points on the 5th and 8th of April 2025 between 10.30am and 11.30am. At that time I took the photographs at the locations capturing the view towards the proposal using a full frame single lens reflex digital camera.
6. The camera was fitted with a 28mm to 300mm zoom lens.
7. All of the photographs were captured by me.
8. The lens was set at a focal length of 28mm.
9. In this instance the 28mm focal length (FOV 75.4°) is a wide angle. This setting captures more of the location's context and is more informative rather than a 50mm focal length (FOV 39.6°) which tends to hood much of that surrounding information due to the lesser angle.
10. The locations of the vantage points are identified on the first page of the photomontage series.
11. The locations are as follows;
  - VP 01** - A view from the playing fields looking north-east.
  - VP 02** - A view from the corner of Blackall and Barts Streets looking north-west.
  - VP 03** - A view from the bowls club footpath looking north-west.

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**VP 04** - A view from 6 Hill street footpath looking north-west.

**VP 05** - A view from the corner of Hill and Campbell Streets looking north-west.

**VP06** - A view from 20 Hill Street footpath looking West.

**VP 07** - A view from 19 Cary Street footpath looking west.

12. The proposal is either visible or partially visible from all the vantage points except VP06. From this location the proposed facility is blocked from view by intervening vegetation.
13. A detailed explanation of the process used to produce these survey accurate photomontages follows.

## 02 - 3D COMPUTER MODELLING:

14. The photomontage process starts by generating a computer model based on the drawings supplied to me by the applicant (Waveconn Pty Ltd).
15. These drawings show the plans and elevations of the proposal.
16. Using that information I created a 3D model of the project using a solid geometry 3D modelling software, Archicad 28.
17. The designers, (Waveconn Pty. Ltd.) provided the content for the landform, the siting of the proposed telecommunications facility pole, head frame, antennae locations and the monopole mounting height in relation to the Australian Height Datum AHD.
18. To ensure accuracy, I also add to this model the information captured by the surveyor which includes;
  - a. The vantage point locations,
  - b. The visible points of the surrounding built form nominated by me, including;
    - i. roof apexes,
    - ii. fascia edges,
    - iii. telegraph poles,

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iv. wire spreaders and,

v. anything else that assists in accurately locating the subject site into its context.

19. These control locations are also captured in AHD.

20. All that survey control information is related to the cadastral boundaries of the subject site that the proposed facility is to be situated within.

21. The drawings and documents provided are identified specifically in Appendix 01 of this report.

### 03 - PHOTOMONTAGE:

22. Computer Photomontage is a combination of the 3D computer modelling and photography, which when used together via a computer process produces a photo realistic impression of the development application proposal. .

23. The following points set out the methodology used to depict the proposed development in its surroundings;

- a. Photographs are taken at the various locations around the site.
- b. The location of these vantage points (VP) are marked on an aerial photograph, Page 01 of the photomontage series.
- c. The camera used for these photographs is a full frame digital single-lens reflex type and has a 28-300mm focal length zoom lens fitted. The vantage point photographs were taken using a 28mm focal length. The photographs are then digitally imported into the computer and form the background of the final images.
- d. The next phase of the photomontage preparation is locating the vantage point cameras within the 3D rendering software. The software is Artlantis 2021. The following procedure takes place in preparation for the final renderings;
  - i. A virtual camera is positioned at each of the vantage point markers located in the 3D model.

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- ii. The focal length is set to 28mm.
- iii. A virtual sun is set to the date and time of day to match the photograph capture time.
- iv. The virtual camera orientation is set using the vantage point photograph as the base.
- v. The 3D model is aligned over the photograph so that the virtual control markers coincide with the photographic control context markers.
- vi. Each scene is then rendered.
- e. These rendered images are then imported to the software Photoshop Creative Cloud 2025.
- f. The following compositing procedure is used to complete the images.
  - i. Import and overlay the rendering of proposal and control markers over the existing photograph.
  - ii. Align rendered image with base photograph using control markers so that they line up with the surveyed objects in the photographs.
  - iii. Digitally remove redundant foreground information.
  - iv. Splice in the rendered image of the proposal between foreground and background.
  - v. Digitally correct image information to reflect landscape concept and plant species.
  - vi. Generally correct any splicing anomalies to ensure a natural photographic image.
- 24. These photomontages represent a reasonable and accurate interpretation of the proposed telecommunications facility in its proposed location and in context with its surroundings.

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## APPENDIX 01: DOCUMENTS RELIED ON:

Document description

drawing number	revision	issue date	description	author
project number AQ4559-002			Communication facility	WAVECONN PTY LTD
G1	G-1	12-07-2024	DRAFT SITE PLAN	
G2	G-1	12-07-2024	DRAFT SITE LAYOUT	
G3	G-1	12-07-2024	DRAFT SITE ELEVATION	



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VISUAL ASSESSMENT PHOTOMONTAGE


project	for	at	description	designer	 <div>Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au</div>		scale :	issue date :
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE	AERIAL VIEW SHOWING VANTAGE POINT LOCATIONS.	WAVECONN			1:2000	22/4/2025
				development approval			job number WAV 0425	vantage point AERIAL

page number  
01






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE	VP 01 - VIEW FROM THE PLAYING FIELDS LOOKING NORTHEAST	WAVECONN		photograph	22/4/2025	
				development approval		job number	vantage point	page number
						WAV 0425	VP 01	02






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE	VP 01 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST	WAVECONN		photograph	22/4/2025	
				development approval		job number	vantage point	page number
						WAV 0425	VP 01	03






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 02 - VIEW FROM THE THE CORNER OF BLACKALL AND BARTS STREETS LOOKING NORTHWEST	development approval		job number WAV 0425	vantage point VP 02	page number 04






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 02 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST	development approval		job number	vantage point	page number
						WAV 0425	VP02	05






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 03 - VIEW FROM THE BOWLS CLUB FOOTPATH LOOKING NORTHWEST	development approval		job number WAV 0425	vantage point VP 03	page number 06






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 03 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST (CB Pale Eucalypt)	development approval		job number WAV 0425	vantage point VP 03	page number 07





VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 03 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST (CB Wilderness)	development approval		job number WAV 0425	vantage point VP 04	page number 08






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer		Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN			photograph	22/4/2025	
				development approval			job number	vantage point	page number
							WAV 0425	VP 04	09






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 04 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST	development approval		job number	vantage point	page number
						WAV 0425	VP 04	10






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE	VP 05 - VIEW FROM THE CORNER OF HILL AND CAMPBELL STREETS LOOKING NORTHWEST	WAVECONN		photograph	22/4/2025	
				development approval		job number WAV 0425	vantage point VP 05	page number 11






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer		Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :		issue date :		
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN			photograph	22/4/2025			
				development approval			job number	vantage point	page number		
							WAV 0425	VP 05	12		






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :		issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025		
				development approval		job number	vantage point	page number	
						WAV 0425	VP 06	13	





VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 06 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST (not visible)	development approval		job number	vantage point	page number
						WAV 0425	VP 06	14






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE	VP 07 - VIEW FROM 19 CARY STREET FOOTPATH LOOKING WEST	WAVECONN		photograph	22/4/2025	
				development approval		job number WAV 0425	vantage point VP 07	page number 15






VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE		WAVECONN		photograph	22/4/2025	
			VP 07 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST (CB Pale Eucalypt)	development approval		job number	vantage point	page number
						WAV 0425	VP 07	16





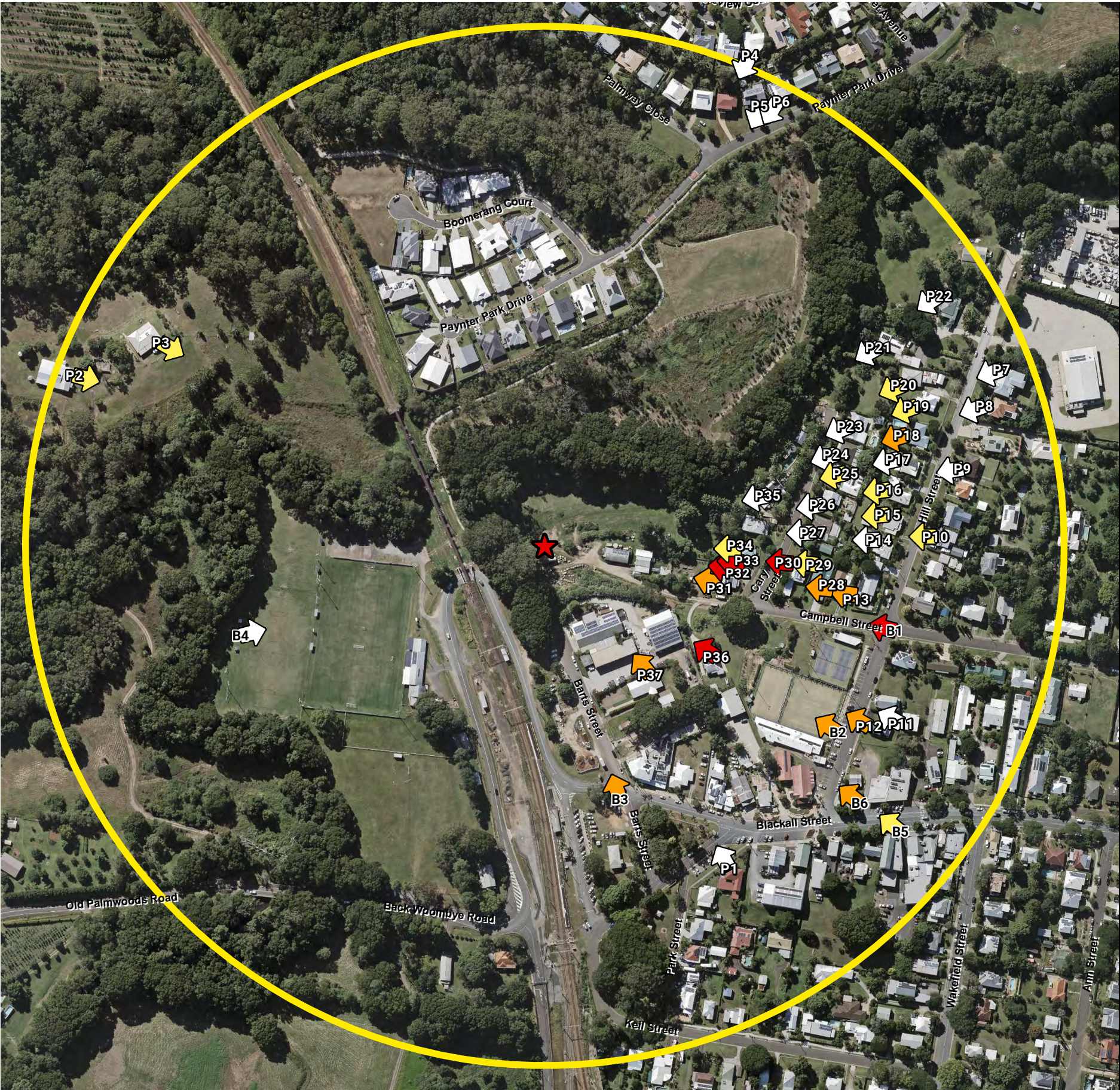
VISUAL ASSESSMENT PHOTOMONTAGE

project	for	at	description	designer	 Design + Visual Communication 31 Meta Place Fig Tree Pocket Q 4069 tel: 3378 3700 m: 0412 545 265 email: mark@markellott.com.au	scale :	issue date :	
PROPOSED TELECOMMUNICATIONS TOWER	WAVECONN	9 CAMPBELL STREET WOOMBYE	VP 07 - VIEW SHOWING THE LIKELY VISUAL OUTCOME OF THE PROPOSED TELECOMMUNICATIONS MAST(CB Wilderness)	WAVECONN		photograph	22/4/2025	
				development approval		job number WAV 0425	vantage point VP 04	page number 17





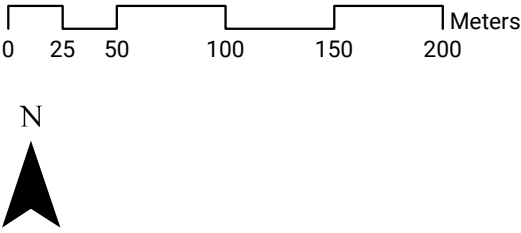




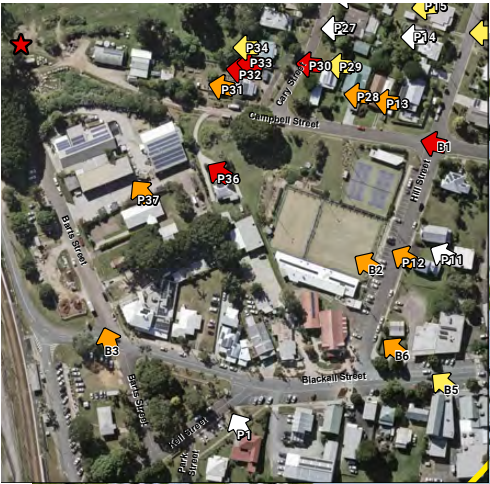
Vantage Point Key Map

Legend

- Proposed Telecommunication Tower
- 400m Distance From Tower
- View Points  
Arrows point to telecommunications tower  
P - Private Views  
B - Public Views
- No discernible impact detected
- Minimal degree of impact detected
- Moderate degree of impact detected
- High degree of impact detected



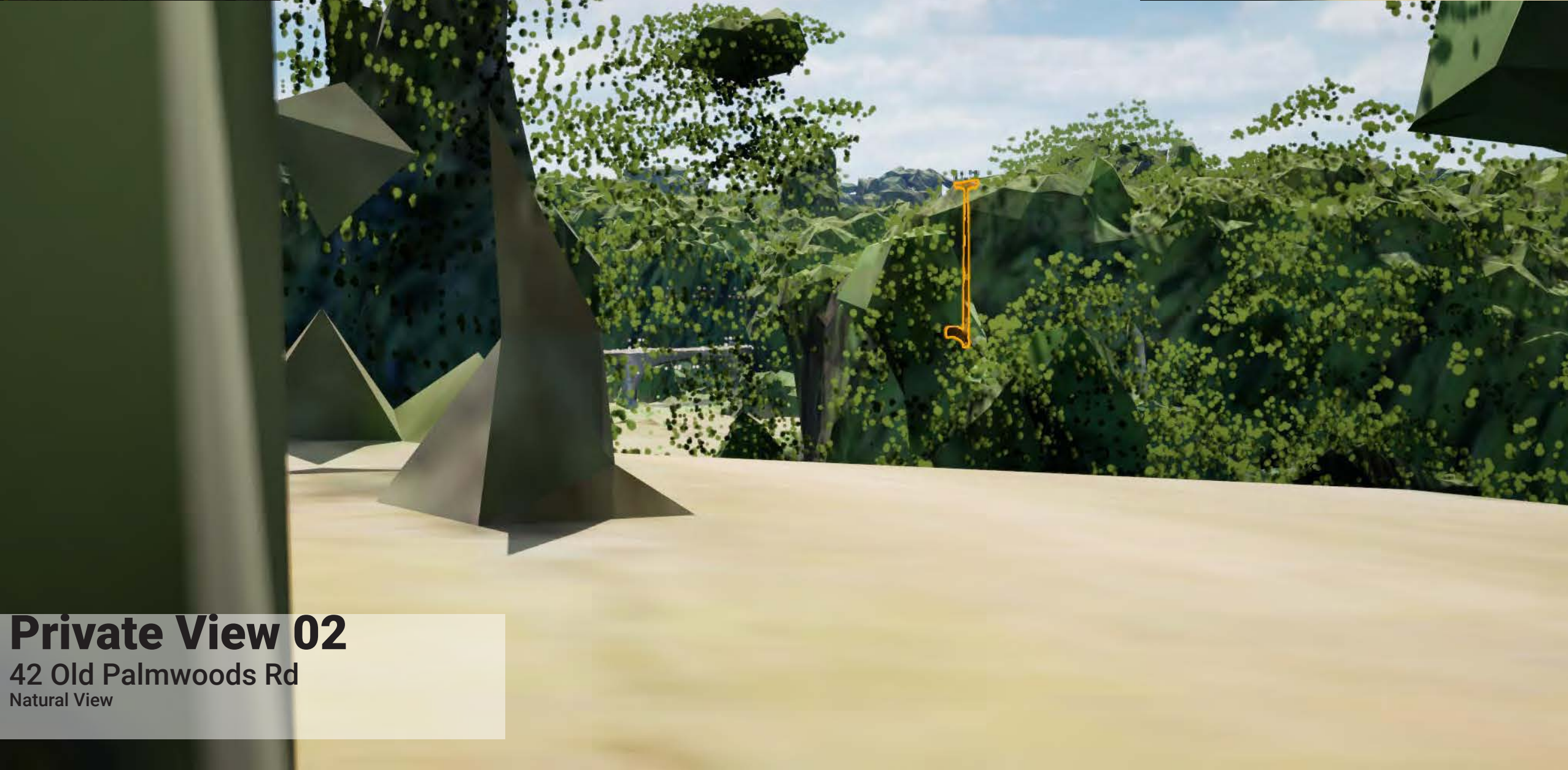








Wide Angle View



**Private View 02**  
42 Old Palmwoods Rd  
Natural View









Wide Angle View



**Private View 04**  
8 Eagleview Ct  
Natural View





Wide Angle View

**Private View 05**  
16 Paynter Park Dr  
Natural View



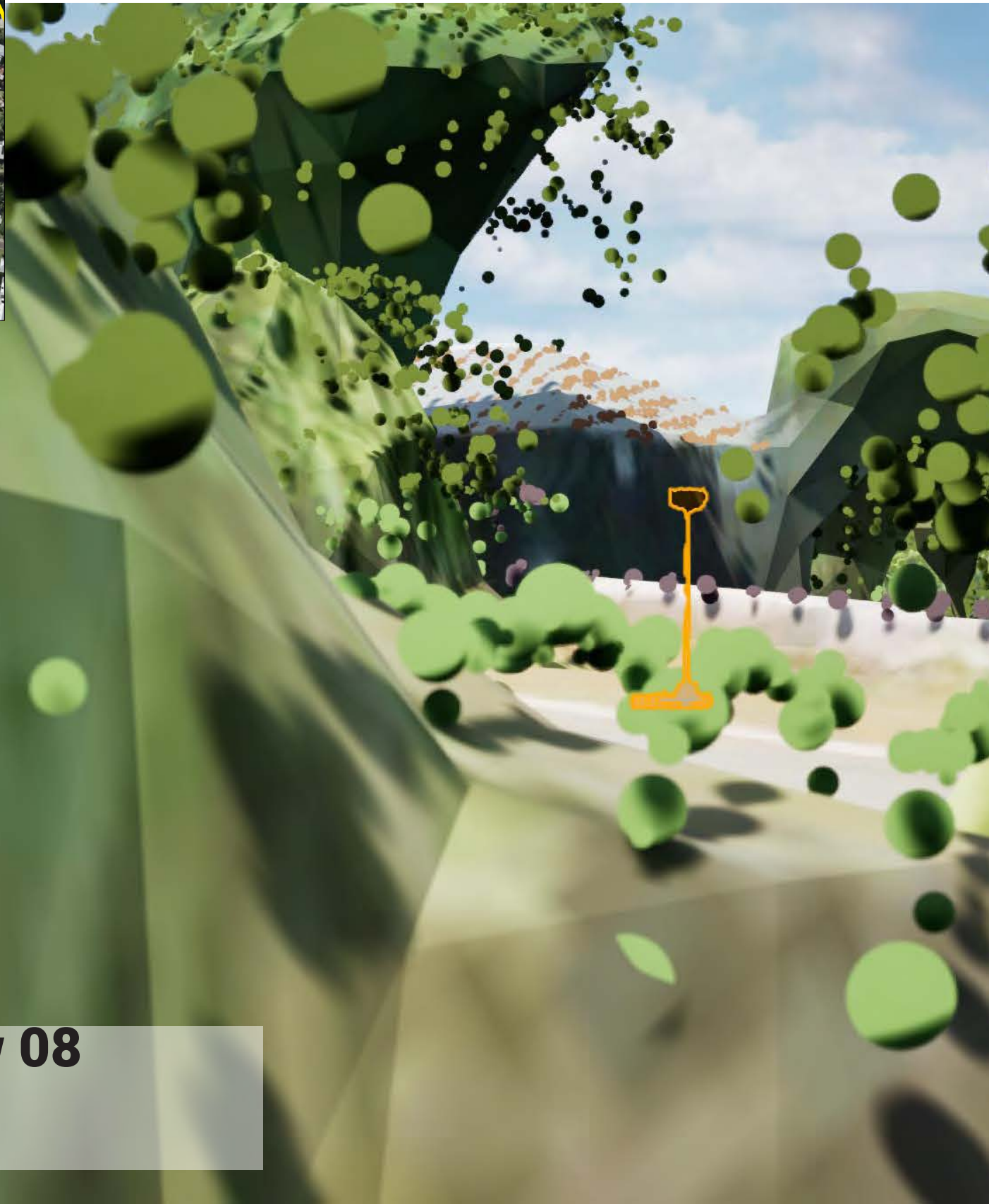


**Private View 06**  
18 Paynter Park Dr  
Natural View





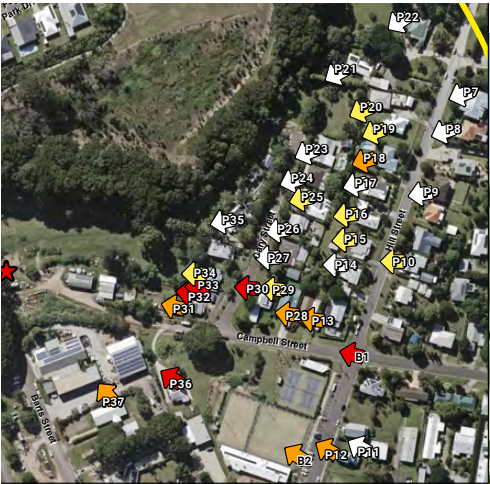




## 30 Hill Street

### Natural View





**Private View 09**  
26 Hill Street  
Natural View



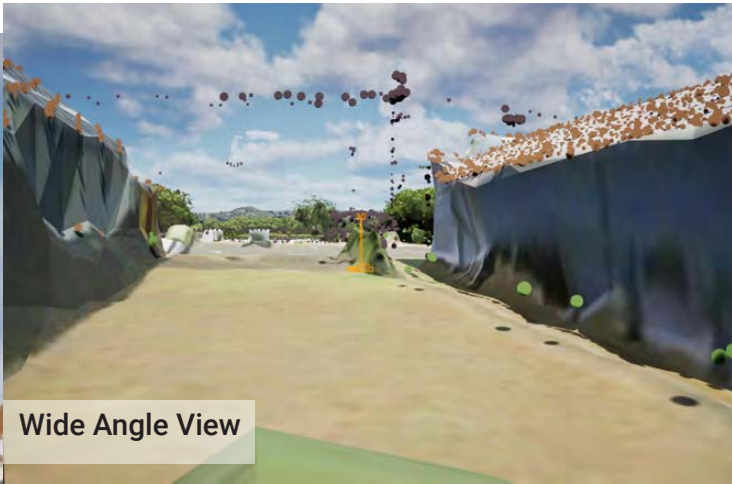
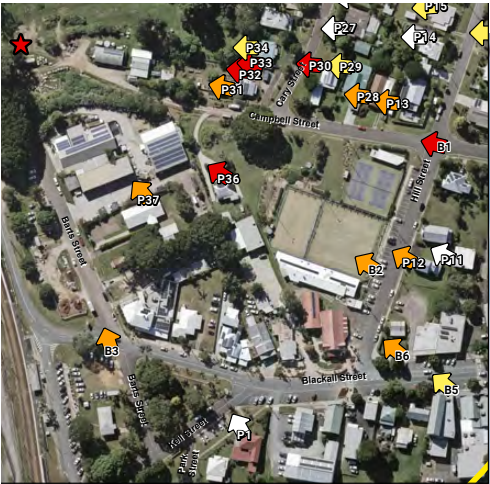


Wide Angle View



**Private View 10**  
20 Hill Street  
Natural View



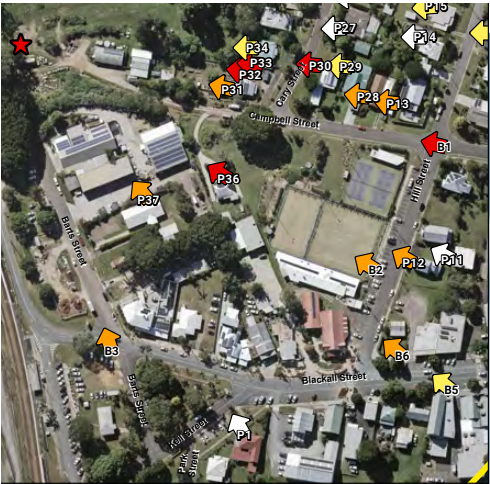


Wide Angle View

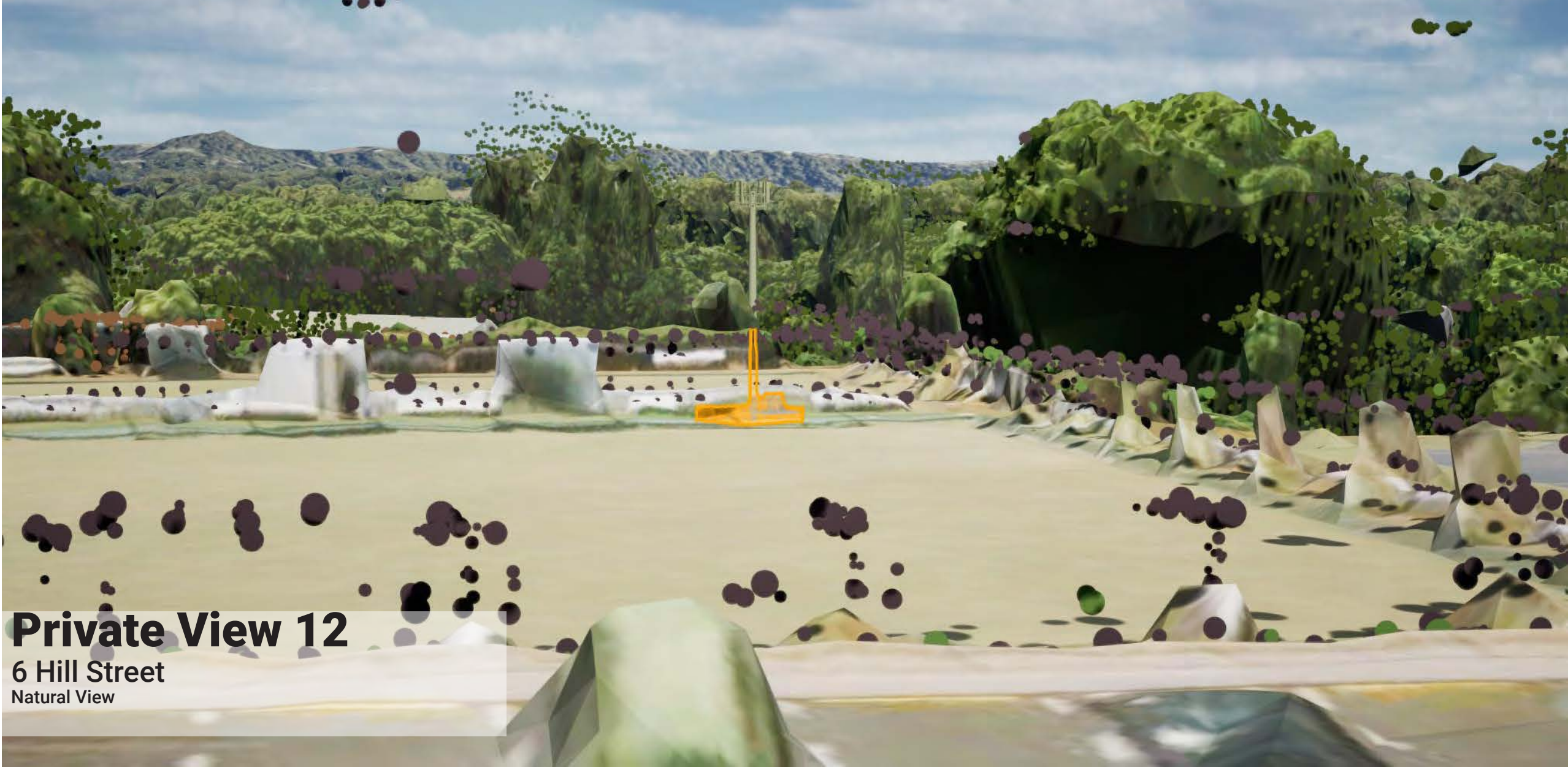


**Private View 11**  
25A Blackall St  
Natural View



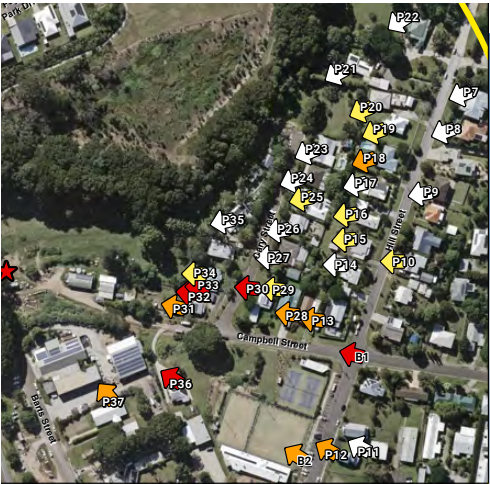


Wide Angle View



**Private View 12**  
6 Hill Street  
Natural View









**Private View 14**  
19-21 Hill Street  
Natural View









Wide Angle View



**Private View 16**  
25 Hill Street  
Natural View













Wide Angle View



**Private View 19**  
33 Hill Street  
Natural View









**Private View 21**  
37 Hill Street  
Natural View



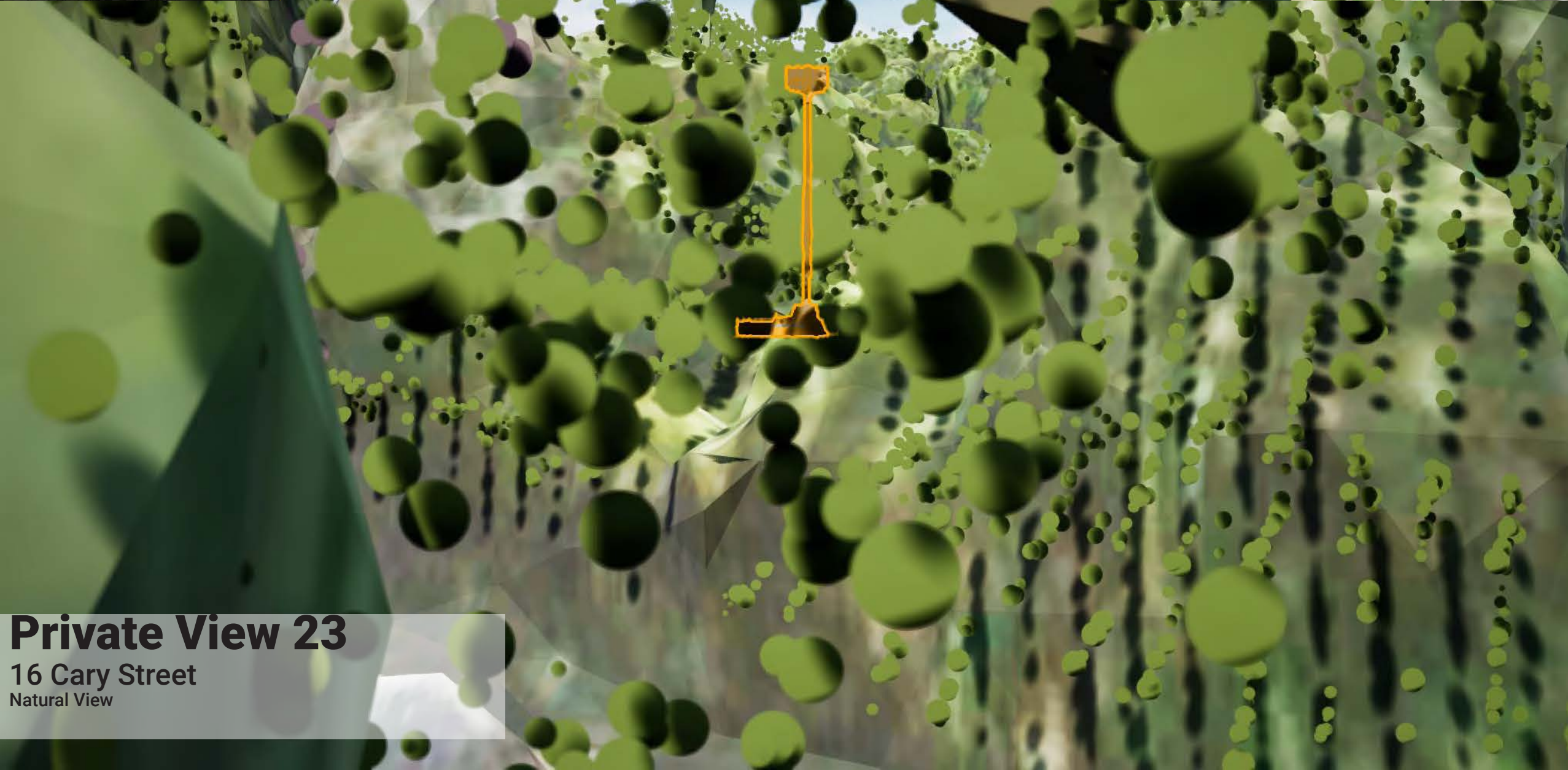
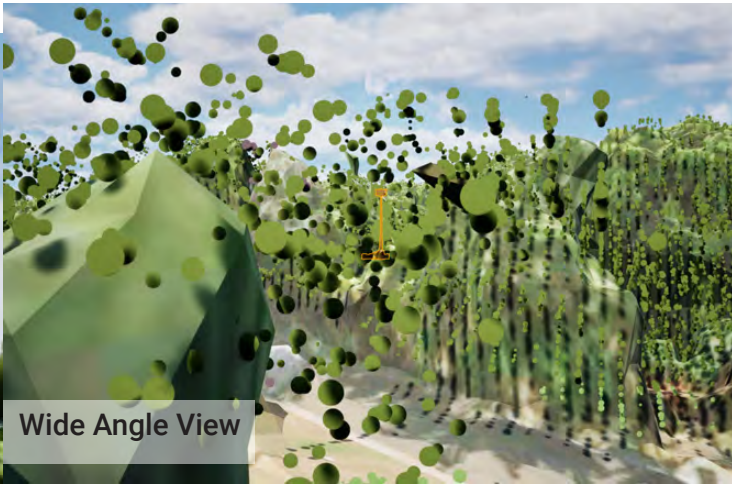
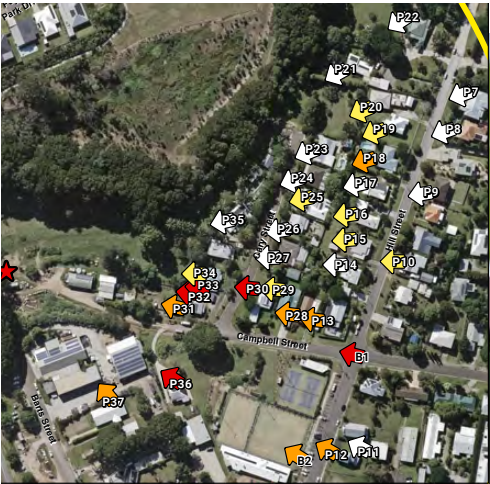


Wide Angle View



**Private View 22**  
39 Hill Street  
Natural View





**Private View 23**  
16 Cary Street  
Natural View



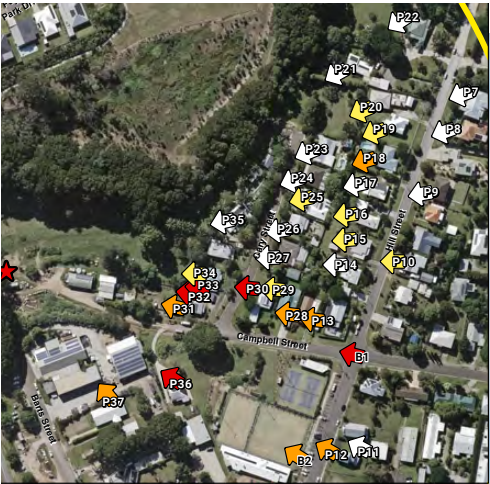




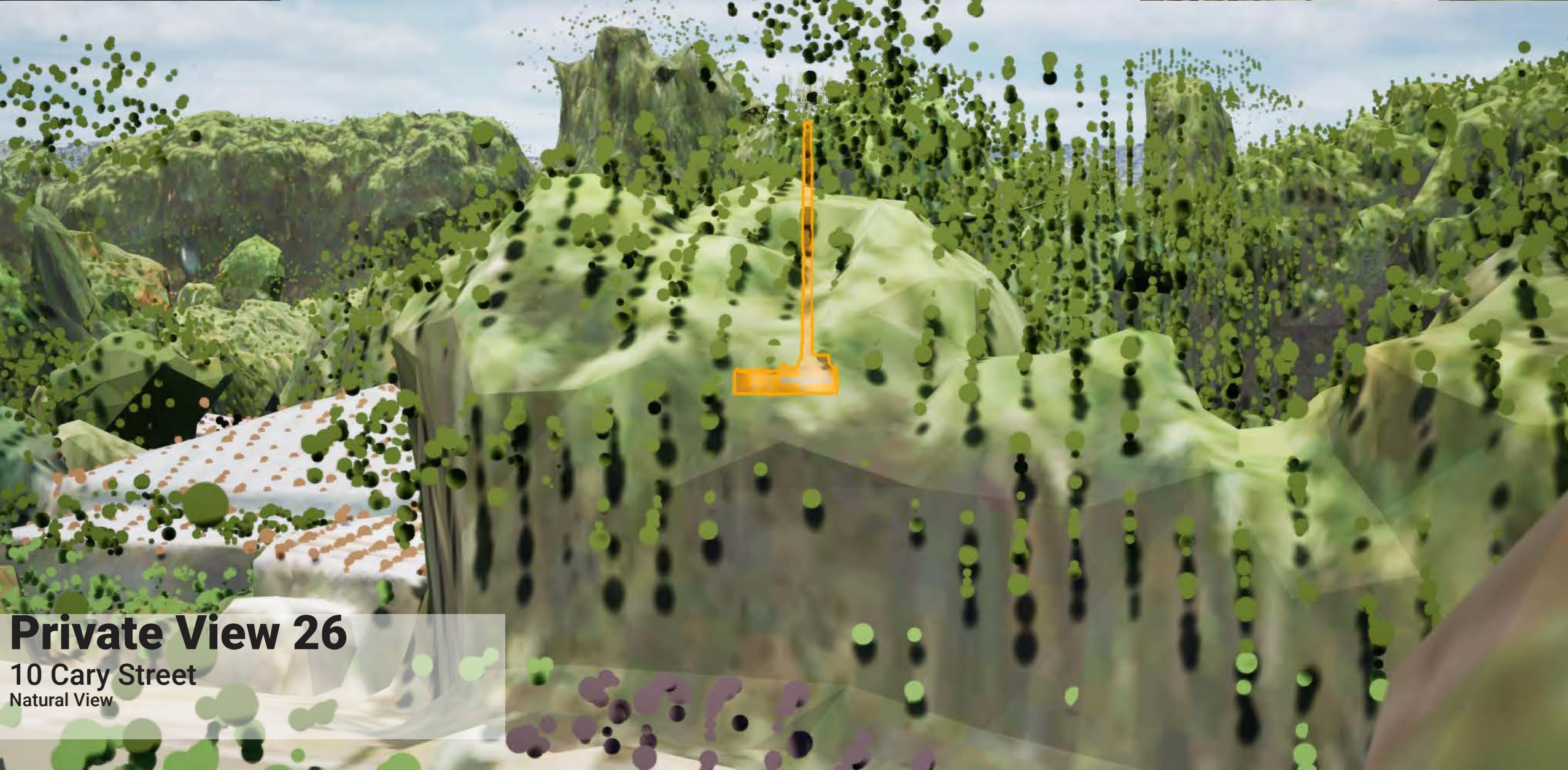


**Private View 25**  
12 Cary Street  
Natural View



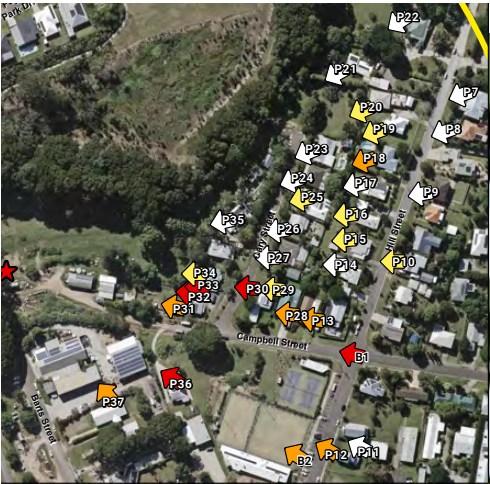


Wide Angle View



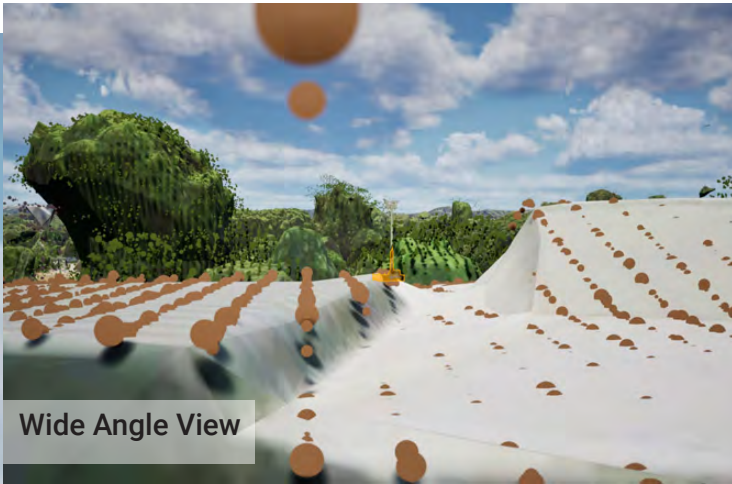
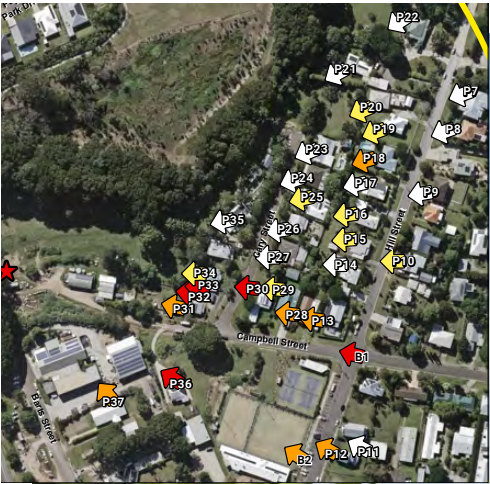
**Private View 26**  
10 Cary Street  
Natural View





**Private View 27**  
8 Cary Street  
Natural View

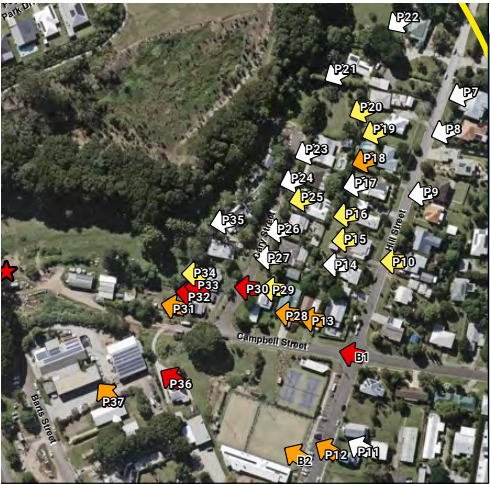
























Wide Angle View

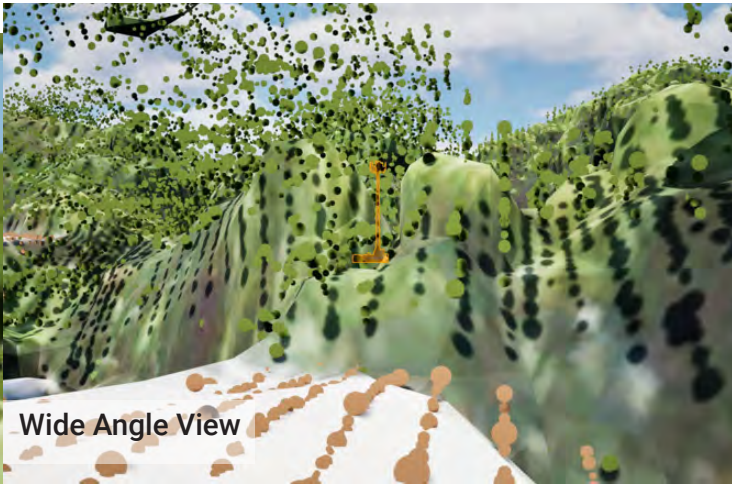
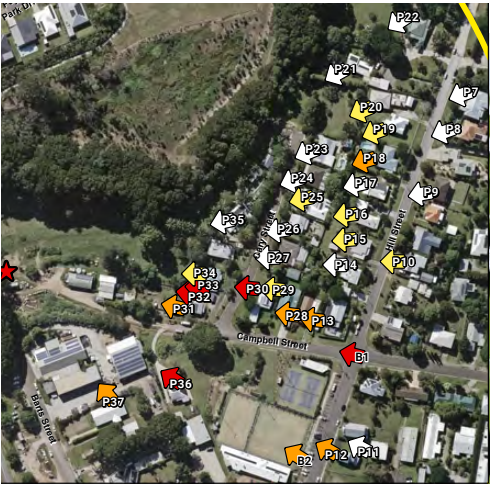


**Private View 33**  
3 Cary Street  
Natural View



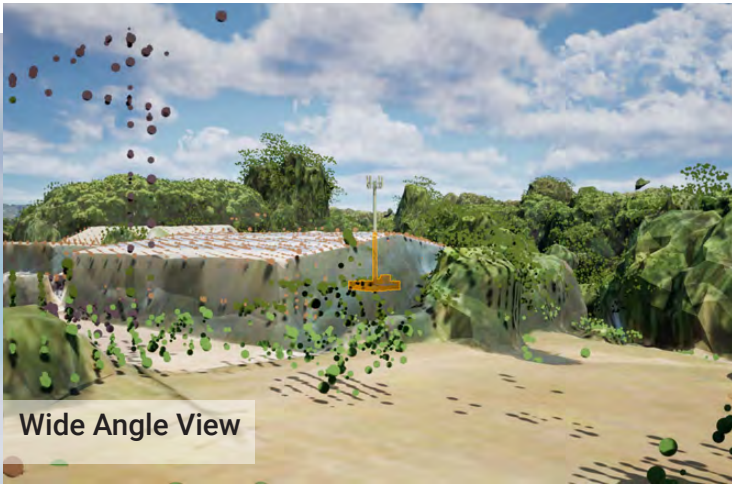




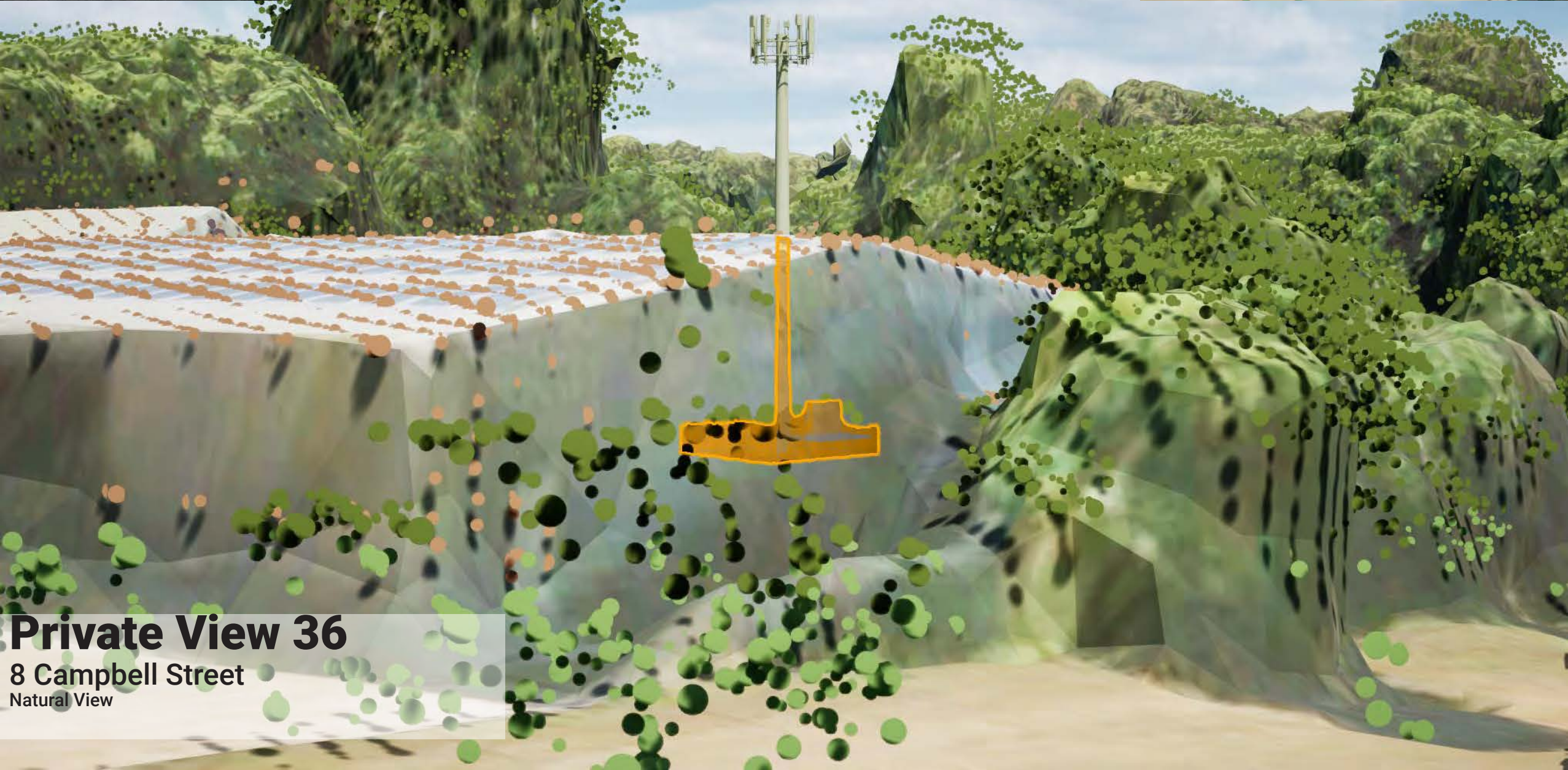


**Private View 35**  
7-15 Cary Street  
Natural View



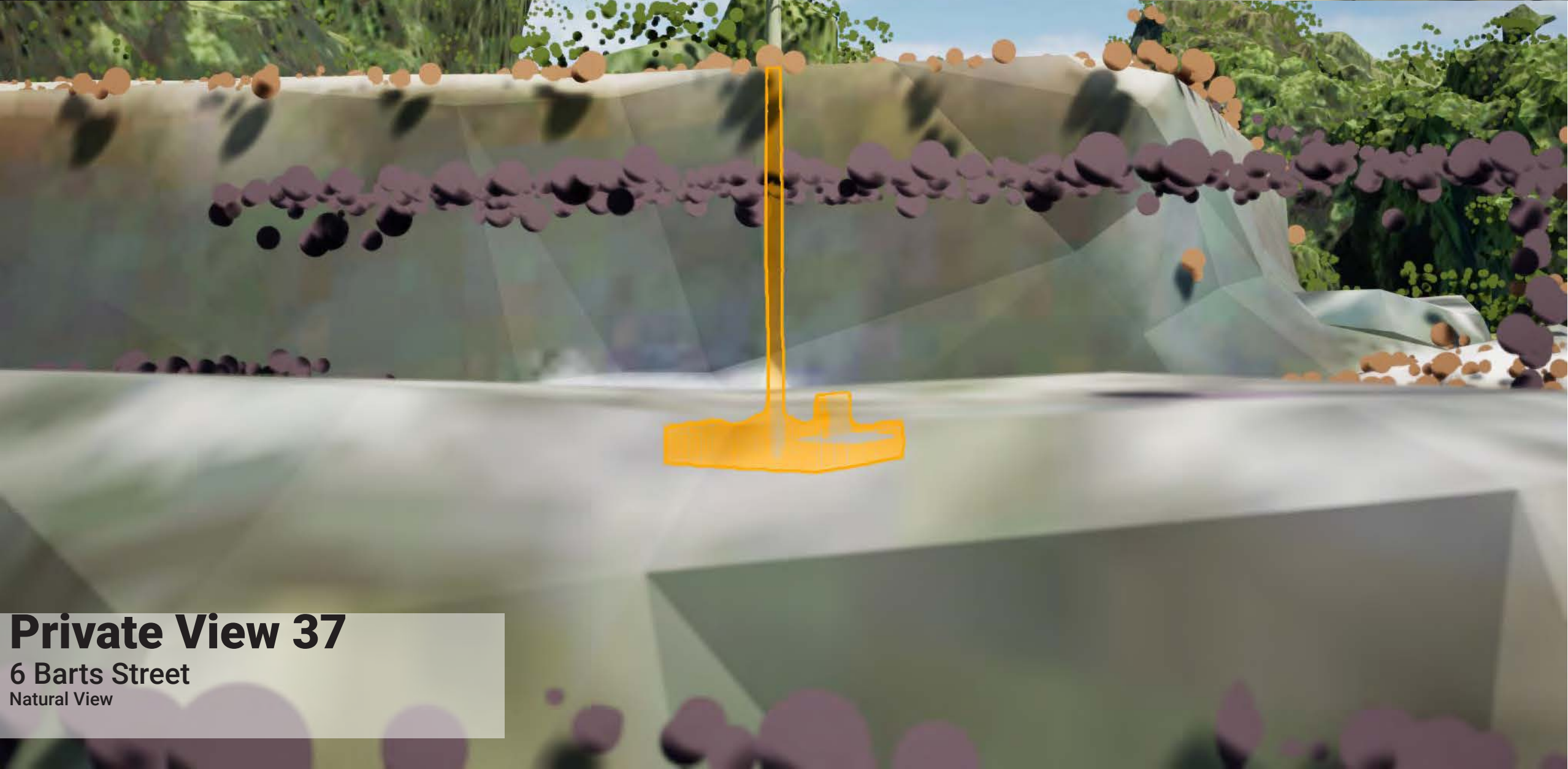
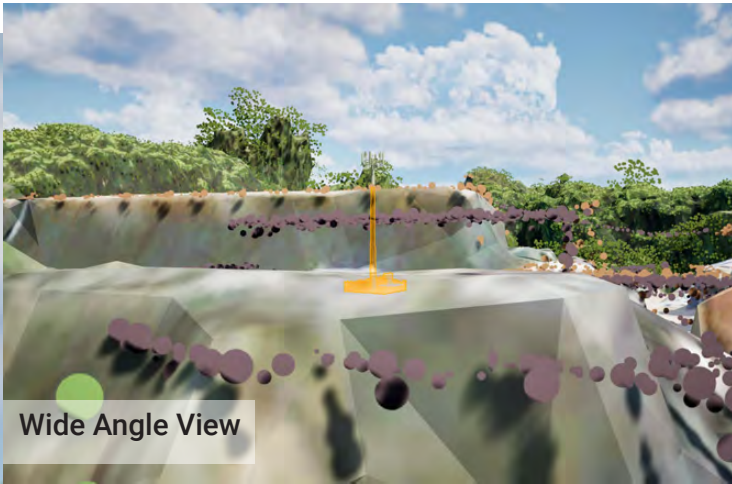


Wide Angle View



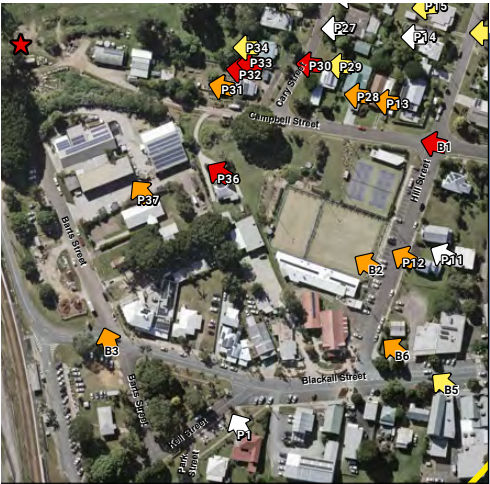
**Private View 36**  
8 Campbell Street  
Natural View





**Private View 37**  
6 Barts Street  
Natural View



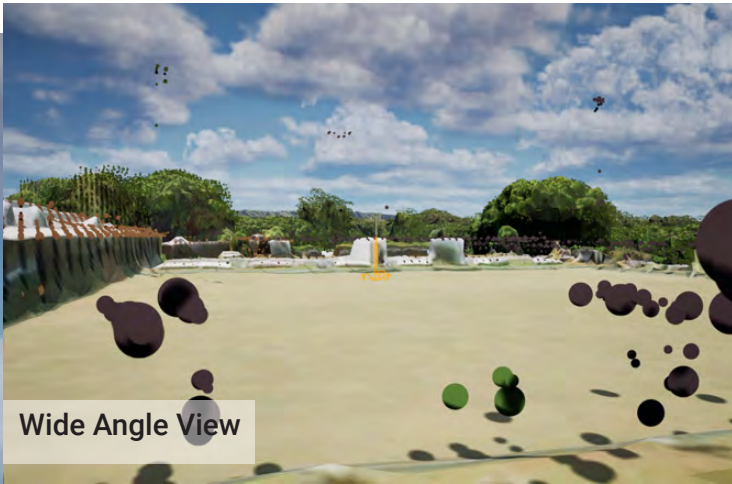
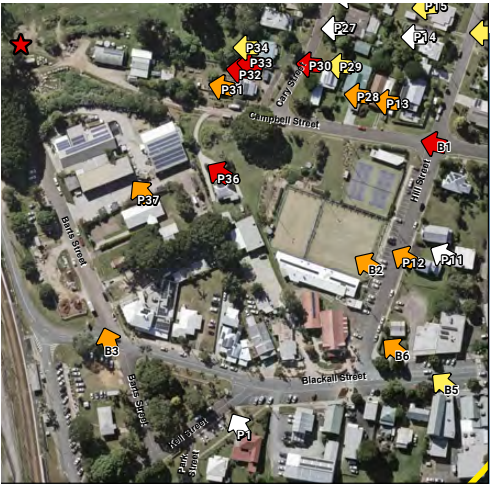


Wide Angle View



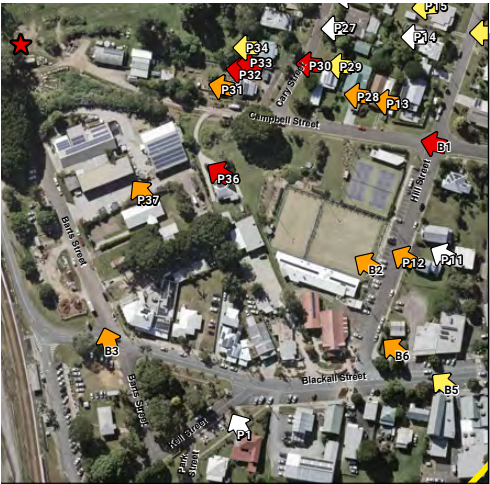
**Public View 01**  
Corner of Campbell Street and Hill Street  
Natural View



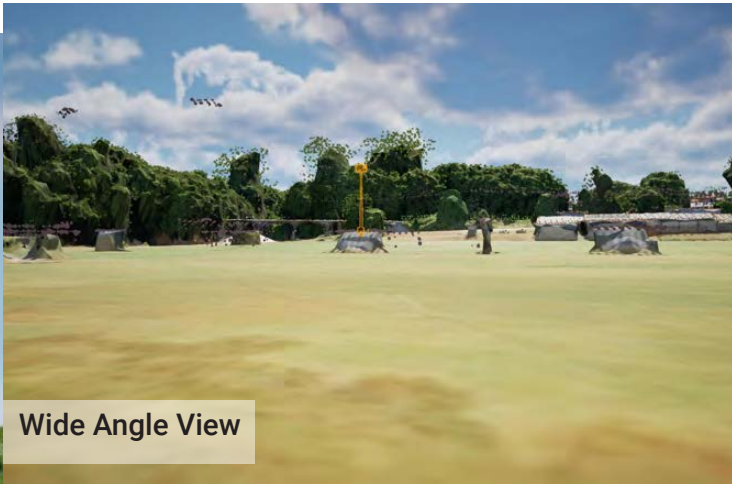


**Public View 02**  
Hill Street, looking over bowling green  
Natural View







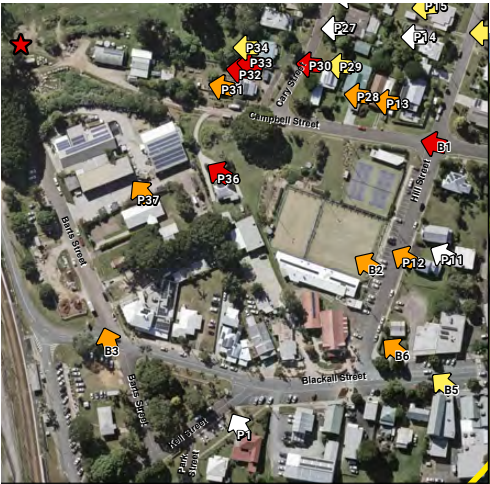


Wide Angle View



**Public View 04**  
Woombye Soccer Club  
Natural View



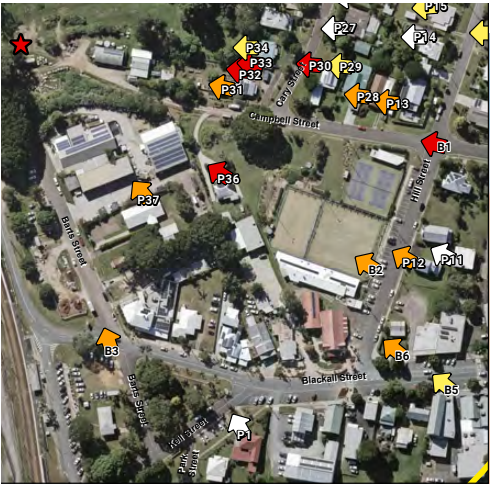


Wide Angle View



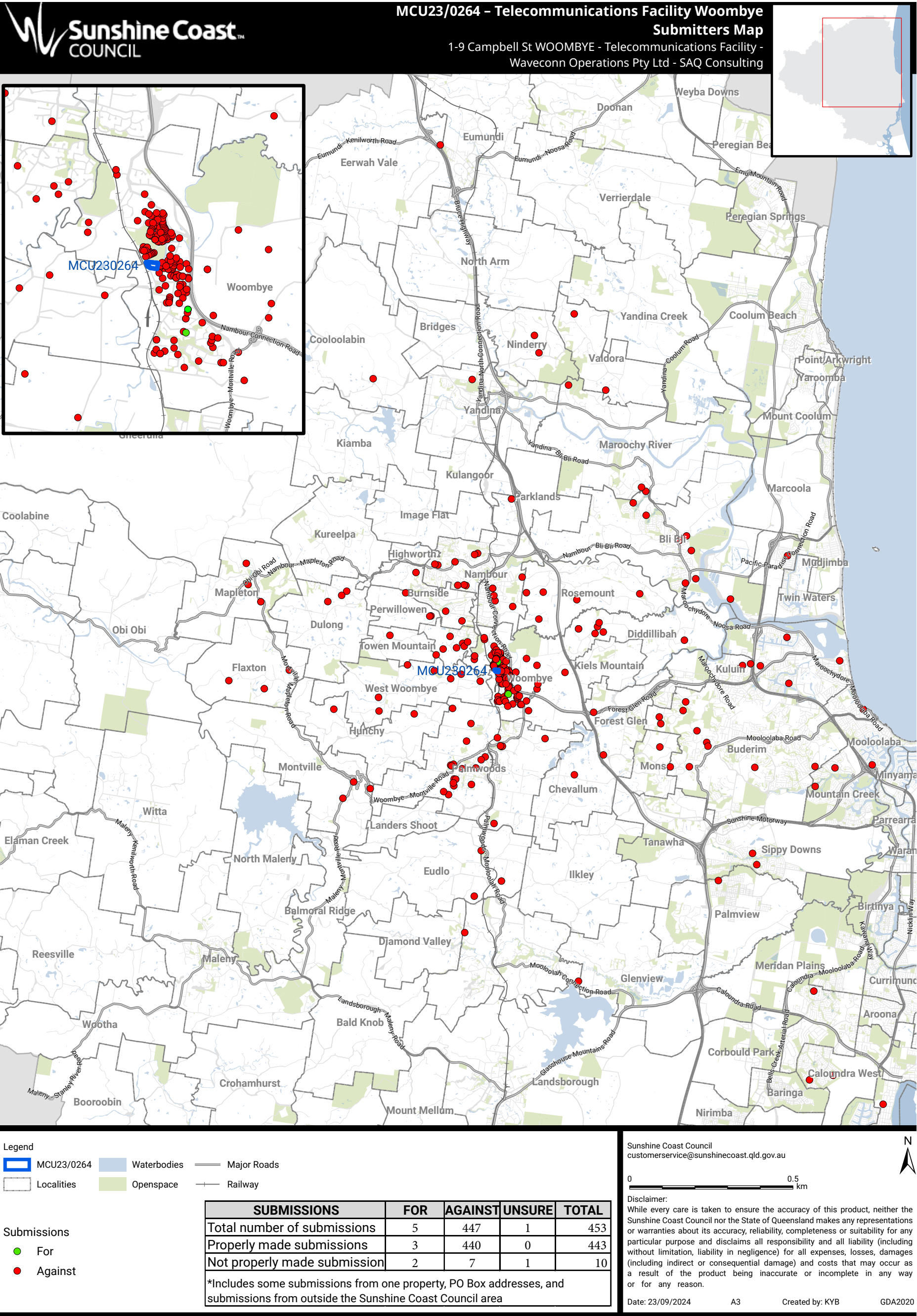
**Public View 05**  
20 Blackall Street  
Natural View





**Public View 06**  
2-4 Hill Street  
Natural View





Legend

MCU23/0264

Localities

Waterbodies

Openspace

Major Roads

Railway

Submissions

For

Against

SUBMISSIONS	FOR	AGAINST	UNSURE	TOTAL
Total number of submissions	5	447	1	453
Properly made submissions	3	440	0	443
Not properly made submission	2	7	1	10

\*Includes some submissions from one property, PO Box addresses, and submissions from outside the Sunshine Coast Council area

Sunshine Coast Council

customerservice@sunshinecoast.qld.gov.au

0

0.5 km

Disclaimer:

While every care is taken to ensure the accuracy of this product, neither the Sunshine Coast Council nor the State of Queensland makes any representations or warranties about its accuracy, reliability, completeness or suitability for any particular purpose and disclaims all responsibility and all liability (including without limitation, liability in negligence) for all expenses, losses, damages (including indirect or consequential damage) and costs that may occur as a result of the product being inaccurate or incomplete in any way or for any reason.

Date: 23/09/2024

A3

Created by: KYB

GDA2020

North Arrow

N



