

### Application for Planning Approval

#### Land Use Planning and Approvals Act 1993

APPLICATION NO.

#### DA2024/053

LOCATION OF AFFECTED AREA

#### **87 COVE HILL ROAD, BRIDGEWATER**

DESCRIPTION OF DEVELOPMENT PROPOSAL

#### **TELECOMMUNICATIONS FACILITY**

A COPY OF THE DEVELOPMENT APPLICATION MAY BE VIEWED AT www.brighton.tas.gov.au AND AT THE COUNCIL OFFICES, 1 TIVOLI ROAD, OLD BEACH, BETWEEN 8:15 A.M. AND 4:45 P.M, MONDAY TO FRIDAY OR VIA THE QR CODE BELOW. ANY PERSON MAY MAKE WRITTEN REPRESENTATIONS IN ACCORDANCE WITH S.57(5) OF THE LAND USE PLANNING AND APPROVALS ACT 1993 CONCERNING THIS APPLICATION UNTIL 4:45 P.M. ON **09/10/2024**. ADDRESSED TO THE CHIEF EXECUTIVE OFFICER AT 1 TIVOLI ROAD, OLD BEACH, 7017 OR BY EMAIL AT <u>development@brighton.tas.gov.au</u>. REPRESENTATIONS SHOULD INCLUDE A DAYTIME TELEPHONE NUMBER TO ALLOW COUNCIL OFFICERS TO DISCUSS, IF NECESSARY, ANY MATTERS RAISED.

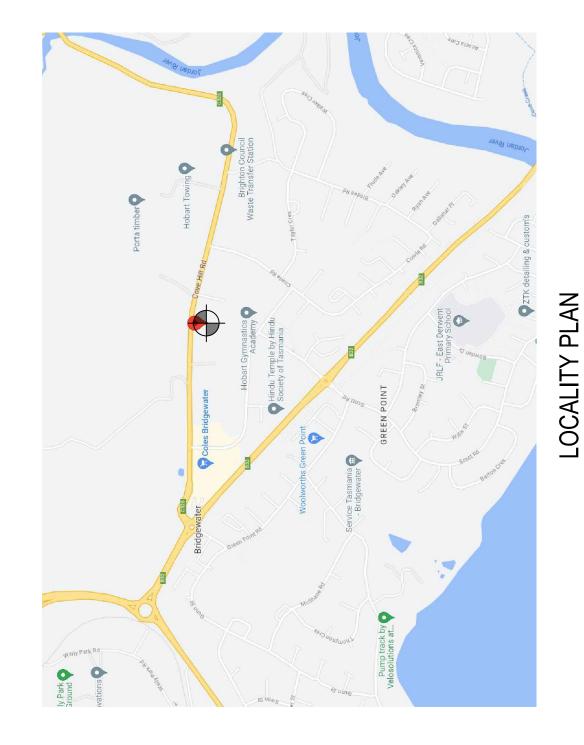
JAMES DRYBURGH Chief Executive Officer





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# **BRIDGEWATER INDUSTRIAL** HOBART -

85 COVE HILL ROAD, **BRIDGEWATER**, TAS 7030

SITE ID: AT7030-003



City West Office Park Suite 3.02, Level 3, Building B 33-35 Saunders Street, Pyrmont, NSW 2009 www.waveconn.com

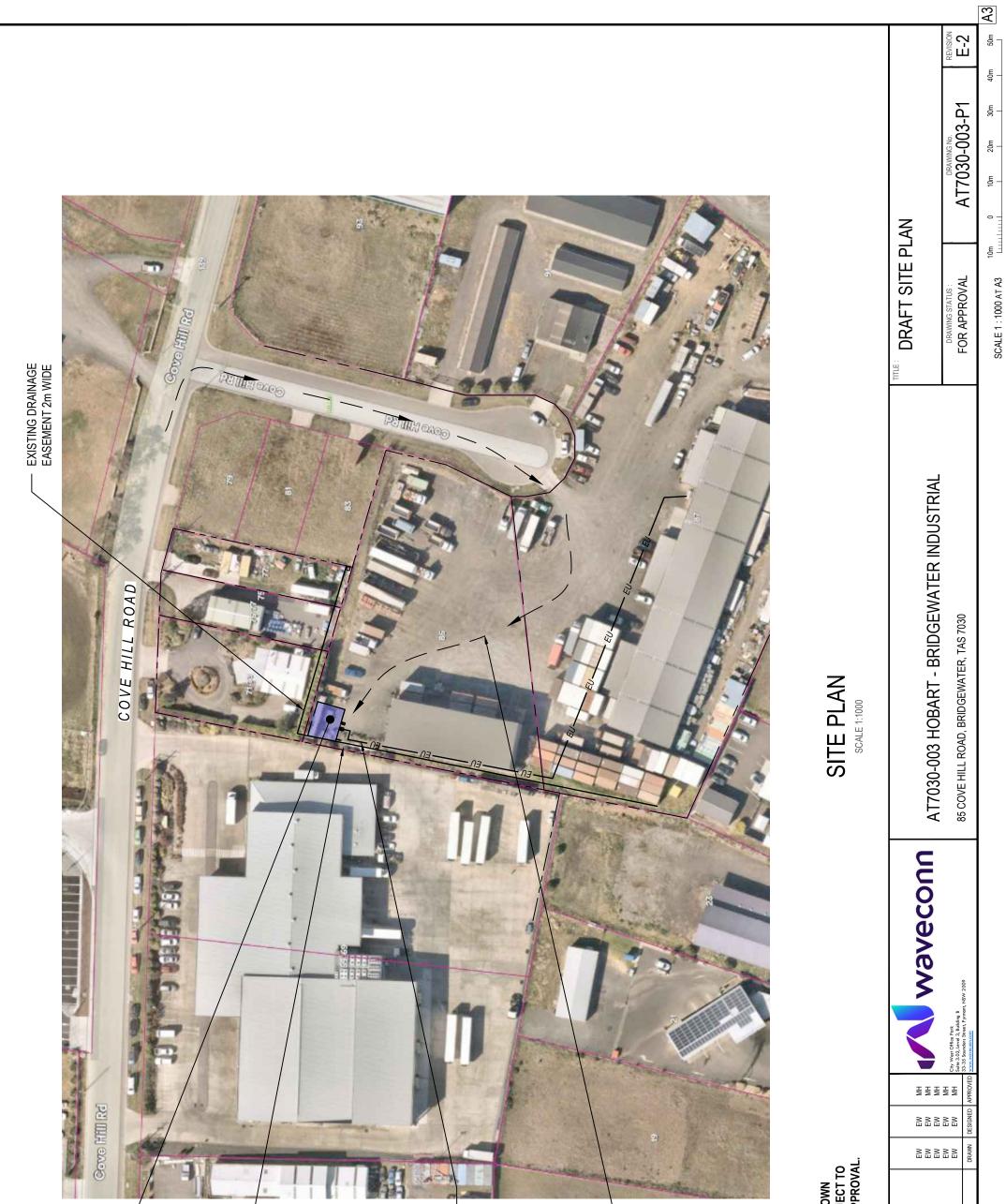
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FOR APPROVAL

AT7030-003 - 00

DATE OF ISSUE	DRAWING PACKAGE VERSION	GENERAL DRAWINGS	AT7030-003-P1   DRAFT SITE PLAN	AT7030-003-P1-2 DRAFT SITE LOCATION
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AT7030-003-P2 DRAFT SITE SETOUT PLAN AT7030-003-P3 | DRAFT SITE ELEVATION





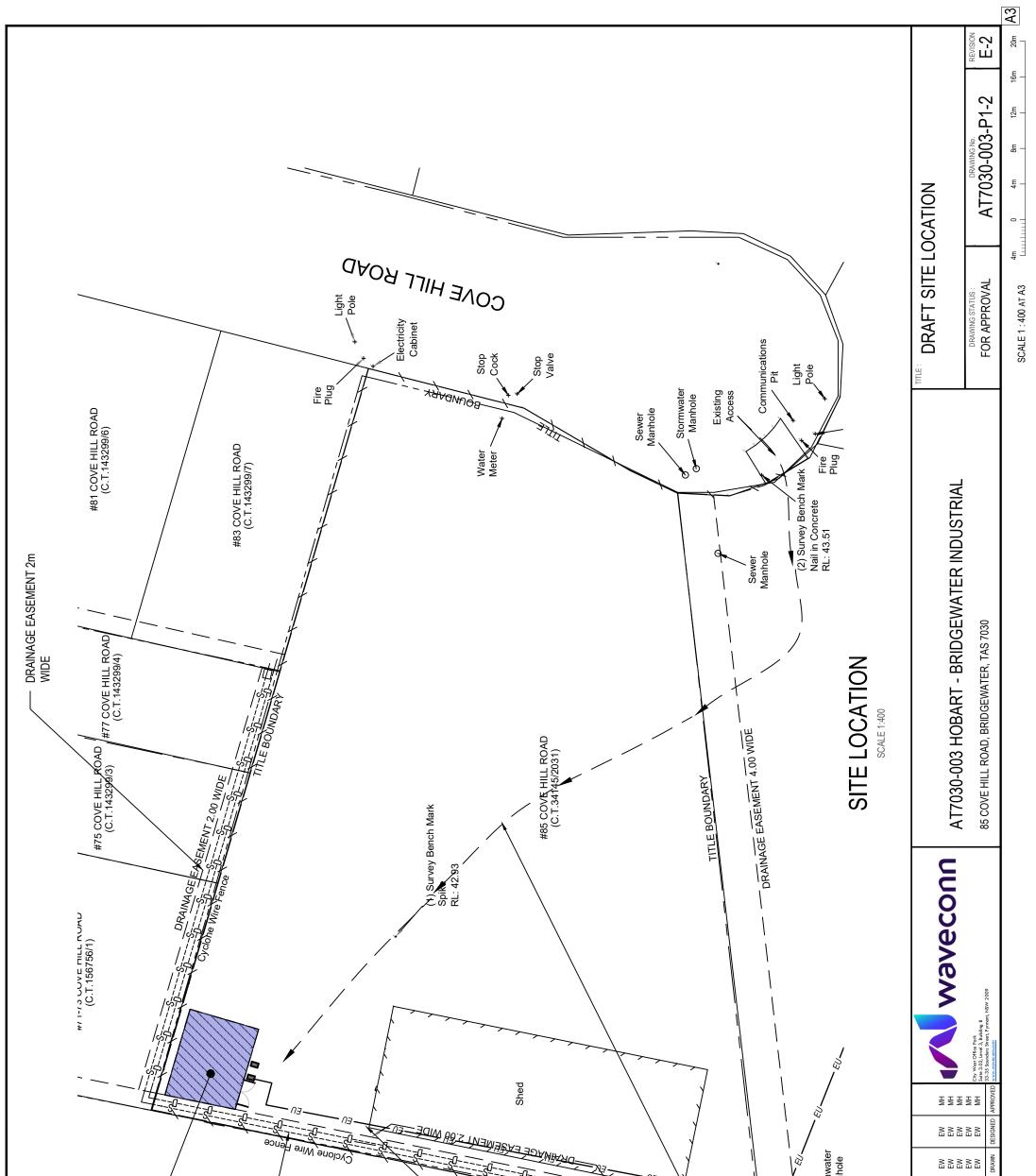
# PROPOSED INSTALLATION — AND LEASE AREA (HATCHED)

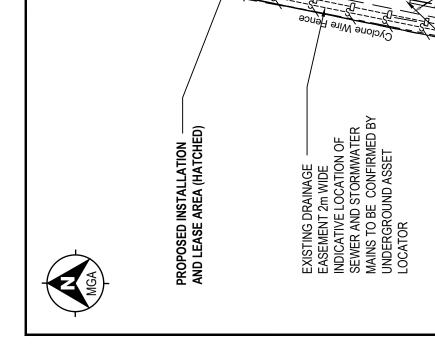
EXISTING DRAINAGE EASEMENT 2m WIDE INDICATIVE LOCATION OF SEWER AND STORMWATER MAINS TO BE CONFIRMED BY UNDERGROUND ASSET LOCATOR PROPOSED ELECTRICAL SUPPLY ROUTE REFER TO NOTE 1

PROPOSED SITE ACCESS

## NOTES: 1. PROPOSED POWER ROUTE SHOWN INDICATIVELY ONLY AND IS SUBJECT TO POWER AUTHORITY DESIGN & APPROVAL.

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PROPOSED ELECTRICAL SUPPLY ROUTE

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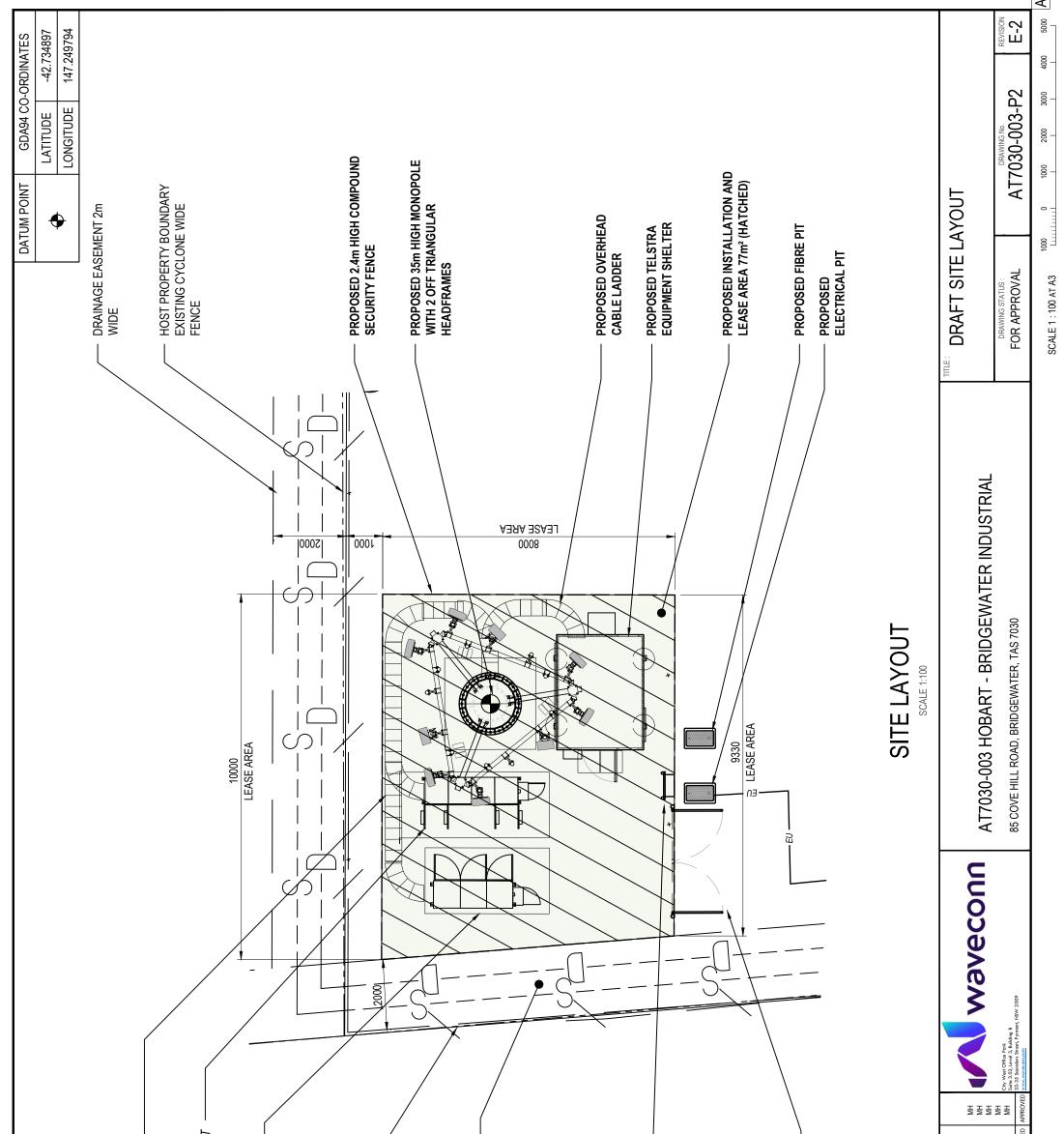
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PROPOSED SITE ACCESS

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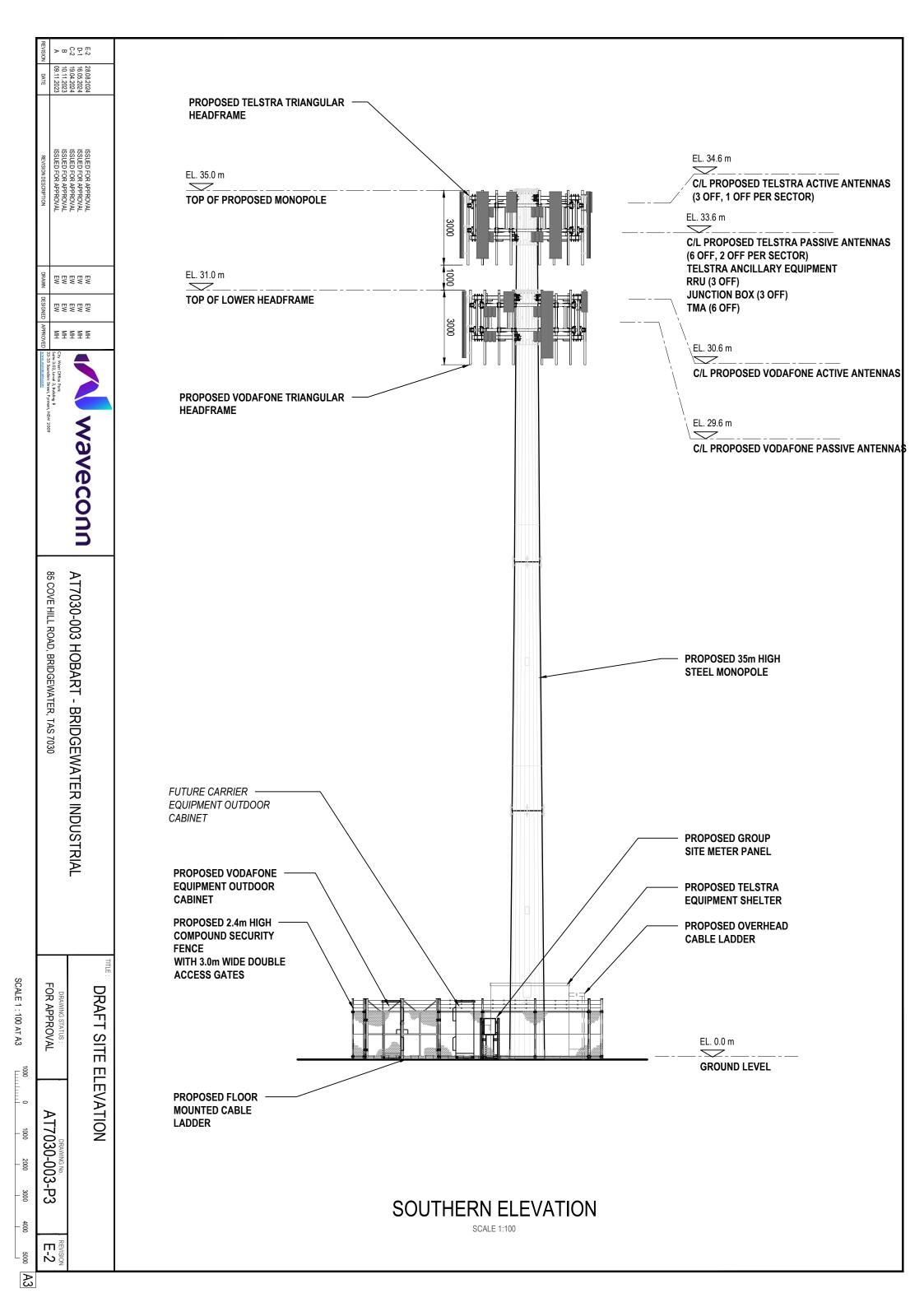
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Our ref: Bridgewater SLB

SAQ

SAQ Consulting Pty Ltd

ABN 76 864 757 592

P O Box 50 Clayfield QLD 4011

12 March 2024

Brighton Council 1 Tivoli Road **OLD BEACH** TAS 7017

#### Attention: Planning Department

#### RE: Proposed telecommunications facility 85-87 Cove Hill Road, BRIDGEWATER

I advise **SAQ Consulting Pty Ltd** acts on behalf of Waveconn Operations (Waveconn) in respect of this application.

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

The proposal by Waveconn is to establish a telecommunications facility, in the form of a mobile telephone base station at 85-87 Cove Hill Road, BRIDGEWATER (specifically on lot 2031 on SP 34145). The location selected is located in the north-western corner of the land, as shown on the attached proposal plans. The subject land is located within the *Light Industrial Zone* pursuant to the Tasmanian Planning Scheme.

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

#### Need for the Facility

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

However, it is critical to note that as Waveconn is an infrastructure owner and provider it <u>will</u> <u>not</u> build the structure until a carrier elects to locate on it – that is, the structure <u>will not</u> be speculatively built in the hope it will be collocated on. As such, there will be no impact – visual or otherwise - from the structure until there is a need for it to be constructed. To that end, Council and the community do not need to be concerned that unnecessary structures will be constructed, regardless of whether there is an approval in place. Notwithstanding, Waveconn is confident that there will be a demand in the short term for the proposed structure and seeks an approval on that basis.



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

Figure 1 below shows an extract from <u>www.rfnsa.com.au</u> which is essentially a database of all existing (and proposed) facilities in Australia. The proposed location is indicated by the orange outline.

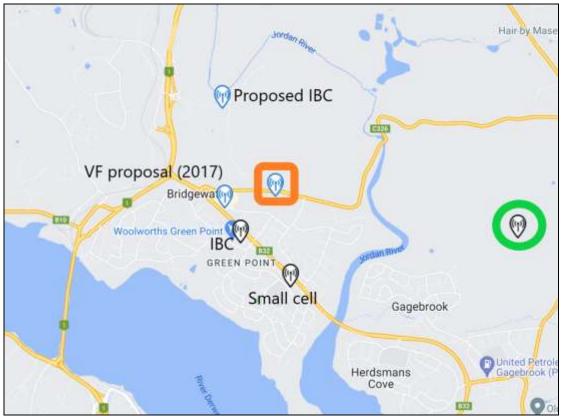


Figure 1: Proposed Location (orange square) and existing facilities in surrounding area

The closest existing base station to the proposed location is located at Gagebrook about 2.4 kilometres east (green circle). This existing location consists of two monopoles (one 25m tall and one 30m tall) utilised by Telstra and Optus respectively.

In terms of other telecommunications infrastructure, Telstra has a 'small cell' installation at its Bridgewater Exchange on Albion Road, with a single 4G antenna at a height of 9 metres. Small cells cover only a few hundred metres around them and cannot provide the full suite of services, nor are they suitable for collocation.

Optus has an 'in-building' system, sometimes known as an IBC, at Greenpoint Plaza, providing coverage inside some of the buildings at that location, but no outdoor coverage.

Typically, small cells and IBCs are installed where coverage levels are poor and there are no existing facilities near enough to be effective.

There is also another proposed Optus IBC at 288 Midland Highway which is also not designed to provide outdoor coverage) and a 2017 Vodafone proposal at 11 Cove Hill Road, which has not been pursued further.



There are no other base stations within 3.2 kilometres (next nearest is a 25m-tall Telstra monopole on Cobbs Hill Road, Bridgewater) and as such, with the growing population in the area, the increasing reliance on mobile devices, the increasing activity in the industrial area (particularly in the large general industrial area to the north) and the important road corridors in the area, it is clear that additional infrastructure is required.

As a general rule, at distances of more than 1-1.5 kilometre between base-stations, 4G services are unreliable with generally poor data performance and indoor service. The situation is even more so for 5G services, which require a greater density of base-stations than 4G in order to provide the much higher data speeds and greater network capacity. As such, based on the location of existing facilities and the nature and extent of urban uses in the locality, there is a clear need for an additional facility in the area.

The proposed facility is well placed to significantly improve coverage and network capacity to the surrounding areas of Bridgewater, including the Green Point locality, Highway 1, the East Derwent Highway, Cove Hill Shopping and the existing and future industrial area along Cove Hill Road. Reliable mobile connectivity is important for the types of businesses established and likely to be established in this area and, given the likely prevalence of large, industrial buildings and sheds, sufficient signal levels to achieve indoor coverage will be critical.

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

#### The Proposal

The proposal is to establish a new telecommunications facility in the form of a monopole, antennas, and equipment cabinets at 85-87 Cove Hill Road, Bridgewater. The details of the facility are shown on the plans lodged with the application.

More particularly, the proposal consists of the following elements:

- a 30-metre tall monopole and compound (approximately 10m x 5m in size) located in the north-western corner of the land;
- a new headframe mounted at the top of the monopole to accommodate up to nine (9) panel antennas;
- a new 4-bay equipment cabinet (dimensions 2.32m H x 0.75m D x 2.87m L), connected to the monopole by a cable tray; and
- security fencing with double gates for access.

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 will be specifically designed to allow for collocation to occur.

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.

Access to the proposed facility will be via the existing entrance from the Cove Hill Road culde-sac and across the yard. The existing storage shed currently located in the north-western corner of the land will be removed and it will not be necessary to remove any vegetation to access, install, operate or maintain the facility. No carparking is affected.

#### Subject Land

The subject land is located on the southern side of Cove Hill Road between Hurst Street and Cowle Road, as shown in Figure 2 below. The land consists of two lots with the proposed facility located on the northern-most lot (lot 2031), with access via the existing cul-de-sac from Cove Hill Road and across part of lot 1.



Figure 2: Subject land with proposed facility compound marked (yellow)

The land is used for transport and logistics, storage (associated with a removal business) and gas cylinder storage and distribution. The land accommodates a number of existing sheds near the southern and western boundaries as well as open air storage of goods and vehicles and large areas for parking and manoeuvring of large vehicles.



The land is irregularly shaped, is 1.53 hectares in size and located in the *Light Industrial Zone*. There are three overlays affecting the land.

The proposed facility is located in the north-western corner of the land, requiring the removal of an existing shed currently storing gas bottles. The gas bottles will be accommodated elsewhere on the land.

#### The Locality

The locality is at the edge of the urbanised area as shown in Figure 3 below. The key features are the industrial area to the north and south of Cove Hill Road, a general business area along Hurst Street and part of the East Derwent Highway and community uses and residential areas in the southern part of the locality. Highway 1 runs along the western edge of the locality and there are also several shopping centres, schools and religious organisations in the area.



Figure 3: Locality with proposed facility marked (red dot)

The pattern of land use is particularly well demonstrated by the zoning map for the area and is actually very consistent with its intent, as shown in Figure 4 below. The subject proposal (red dot) is located well inside the *Light Industrial Zone* and is buffered from the residential area by the *General Business Zone*. The nearest residential dwelling to the proposed facility is about 200 metres to the south, at the corner of Paice and Hurst Streets. Given the zoning in the area it is almost certain that any future dwellings will not be closer than 200 metres.

The large *General Industrial Zone* to the north will further ensure impacts are minimised while allowing for more appropriate levels of service are available to this important development area which will be a key employment and economic activity contributer.

As noted above, there are no similar facilities within the locality, with the nearest at Gagebrook. The Optus IBC and Telstra small cell are such that they are do not contribute to the coverage in the industrial area in particular.



*Figure 4: Zoning Map with proposed facility marked (red dot)* 

#### Assessment against the Planning Scheme

As noted above, the subject land and proposal is located in the *Light Industrial Zone* of the Tasmanian Planning Scheme.

Telecommunications facilities are addressed by the Tasmanian Planning Scheme and State Planning Provisions where they are grouped in the use class 'Utilities' (clause 6.2). The subject land is located in the *Light Industrial Zone* with a telecommunications facility listed (under Utilities) as a discretionary use within the zone and can therefore be granted a permit pursuant to clause 6.8.

The State Planning Provisions also contain a *Telecommunications Code*, against which the proposed facility is to be assessed. There are no clauses within part 7 (general provisions) that apply to the proposal or require further discussion for the purposes of this assessment.

Three overlays affect the land:

- Bridgewater Quarry Specific Plan Area
- Brighton Industrial Hub Specific Plan Area
- General Business Zone Local Area Objective

The location selected for the proposed facility is <u>not</u> within the General Business Zone Local Area Objective overlay.

The proposal is also subject to the Brighton Local Provisions Schedule.

#### State Planning Provisions – 18.0 Light Industrial Zone

The purpose of the *Light Industrial* zone is set out at 18.1 of the State Planning Provisions and is as follows:



- 18.1.1 To provide for manufacturing, processing, repair, storage and distribution of goods and materials where off site impacts are minimal or can be managed to minimise conflict with, or unreasonable loss of amenity to, any other uses.
- 18.1.2 To provide for use or development that supports and does not adversely impact on industrial activity.

The off-site impacts of the proposed facility are limited only to visual impact and having considered the nature of those adjacent land uses (particularly the existing land uses to the north and west in this instance) but the layout of those adjacent sites, the proposed facility will not have any unreasonable impact on those properties that would impact on their ability to continue functioning within the *Light Industrial Zone*. There are no land use conflicts arising and those adjacent land uses will have significantly improved telecommunications access as a result of the facility.

The proposed facility is a type of land use and has been sited on the subject land to ensure it has no impact on the primary use of the subject land or the industrial activity in the surrounding area.

As per 18.2, a planning permit is required for the development of a telecommunications facility in this zone and is listed as a discretionary use (defined under "utilities").

<u>18.3 Use Standards</u> 18.3.1 All Uses

#### Objective: That uses do not cause an unreasonable loss of amenity to residential zones.

The proposed facility is located about 200 metres away from both the nearest residential zone and the nearest residential use, is separated by the *General Business Zone* and is on the far side of the subject land, with a number of intervening large buildings. As such, the proposed facility will not cause any unreasonable loss of amenity to the residential zones.

The facility is a type of land use that needs to operate 24 hours a day, 7 days a week and the impact of its operation does not change at different times of the day. The only operational impact will be that of air-conditioning within the equipment cabinet, which will not be heard appreciably at any location, let alone the residential area. There is no lighting associated with the proposal and all electromagnetic emissions are well within the mandatory public safety standard.

Once constructed, the facility requires only infrequent maintenance visits – perhaps 2-4 times a year. This will typically require an SUV or similar to visit the facility, which will have no material impacts on local traffic. On-site parking and space is available for both the construction and operational aspects of the proposal.

#### 18.3.2 Discretionary Uses

Objective: That uses listed as Discretionary do not compromise the use or development of the land for industrial activities with minimal or managed off site impacts.

The proposed facility occupies a very small part of one corner of the land (about 50sqm) and has been sited to ensure there is no impact on the use of the balance of the subject land nor



the functioning of the industrial area. The off-site impacts are limited to visual impact, arising only from the required operational height of the facility, with this impact considered acceptable in this setting with no unreasonable impact on residential zones or uses.

18.4 Development Standards for Buildings and Works 18.4.1 – Building Height

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Objective: To provide for a building height that:

- (a) Is necessary for the operation of the use; and
- (b) Minimises adverse impacts on adjoining properties

The proposed facility is a type of land use that requires sufficient height to operate effectively and provide appropriate levels of coverage and network capacity to the surrounding area. The proposed 30-metre height is typical of such structures in urban areas, particularly nonresidential zones such as is the case here.

The off-site impacts are limited to visual impact only and given the structure's low bulk there will be no unreasonable impacts on overshadowing or similar, nor will it interpret any views. The location selected is about 200 metres from the nearest residential zone.

18.4.2 Setbacks

Objective: The building setbacks:

- (a) are appropriate for the site; and
- *(b) do not cause an unreasonable loss of residential amenity to adjoining residential zones*

The proposed facility will be located in the rear corner of the subject land and therefore exceeds the front setback requirements. Its siting in this location, well out of the way of the day-to-day operations of the land, is considered appropriate for the site.

Neither the subject land nor the site of the proposed facility adjoins a residential-type zone.

18.4.3 Fencing

Objective: That fencing does not cause an unreasonable loss of residential amenity to adjoining residential zones.

Neither the subject land nor the site of the proposed facility adjoins a residential-type zone.

18.4.4 Outdoor storage areas

Objective: Outdoor storage areas do not detract from the appearance of the site or surrounding area.

The proposed facility does not incorporate any outdoor storage areas.

18.4.5 Landscaping

Objective: That landscaping enhances the amenity and appearance of the streetscape where buildings are setback from the frontage.

The proposed facility is set back in a rear corner, well away from the street frontage. No landscaping is required in this instance as it cannot contribute to the streetscape.

18.5 Development Standards for Subdivision

No subdivision is required or proposed.

<u>State Planning Provisions – C5.0 Telecommunications Code</u> The Telecommunications Code sets out its purpose as follows:

- *C5.1.1* To provide for telecommunication networks as a service for the community.
- *C5.1.2* To ensure that facilities are co-located where practicable.
- C5.1.3 To ensure that facilities use mitigation measures to avoid an unreasonable loss of visual amenity

The code applies to the proposal pursuant to C5.2 and is defined as per C5.3 as both a facility and a tower. As per C5.5 there are no use standards applicable to the code.

C5.6.1 Visual Amenity

*Objective* That facilities do not cause an unreasonable loss of visual amenity.

The proposed facility is <u>not</u> located within an existing utility corridor, nor is there an existing facility on the site.

The proposed facility's impacts are limited to that of visual impact, with the location selected well away from the main thoroughfare of Cove Hill Road and street frontages. The impacts are limited to those on the existing industrial properties to the north and west, the current use and layout of both will ensure the impacts are not unreasonable, given the location within an industrial area well away from residential uses and there are no views or other relevant matters to consider.

The location selected is well inside the industrial area amongst existing building and there is no clearing of vegetation required.

The height of 30 metres is required for proper and efficient operation of the proposed facility and given it is set well away from residential zones and uses and nearby a general industrial zone this height is considered acceptable in this instance. The need for a facility in this area has been clearly set out above.

Having regard for the requirements of the Telecommunications Code, it is considered the proposed facility demonstrates a suitable level of compliance.



#### Brighton Local Provisions Schedule

The Brighton LPS contains two specific area plans applicable to the subject land and proposal, which are the:

- BRI-S4.0 Bridgewater Quarry Specific Plan Area
- BRI-S10.0 Brighton Industrial Hub Specific Plan Area

#### Bridgewater Quarry Specific Plan Area

The purpose of the Bridgewater Quarry Specific Plan Area is to protect the operations of the Bridgewater Quarry from incompatible or conflicting use or development.

The proposed facility is not a sensitive land use, is not affected by the operations of the quarry, nor is it incompatible its operations. As such, the proposal is consistent in this respect.

#### Brighton Industrial Hub Specific Plan Area

The purpose of the Brighton Industrial Hub Specific Plan Area is to protect the area from sensitive land uses being established.

The proposed facility is not a sensitive land use and is therefore consistent with the requirements.

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#### Conclusion

The proposal by Waveconn is to construct a new telecommunications facility in the form of a 30m-tall monopole and associated equipment at the rear of 85-87 Cove Hill Road, Bridgewater.

The proposed facility has been identified as being required to meet the current and future projected need for improved telecommunications in this area and forms part of a larger program of forward planning for expanding and improving telecommunications services across Tasmania.

There are no similar existing facilities within 2.4 kilometres of the selected location and given the importance of the area as an industrial and employment hub there will be a requirement for an additional structure as demand for telecommunications services continues to increase.

The proposed facility is appropriately located both within a light industrial zone and on the subject land itself. It is well away from residential and other sensitive land uses. There is no impact on vegetation or carparking and the impact is limited to that of visual on the industrial properties to the north and west.

As set out above, the proposed facility is generally in accordance with the relevant State Planning Provisions, including those contained in the *Light Industrial Zone* and the applicable Codes, and in particular is consistent with the requirements and standards set out in the Telecommunications Code. The proposal does not unreasonably interfere with the subject land and has no material impact on adjoining land for the reasons set out above.

Accordingly, having had regard for all relevant matters the application warrants a planning permit.

Should Council require any additional information prior to making its determination, please do not hesitate to contact the undersigned.

Yours sincerely

MARK BAADE B. Plan (Hons) M: 0417 088 000 mark@saqconsulting.com.au