



# NOTICE

of

## COUNCIL ASSESSMENT PANEL MEETING

*Pursuant to the provisions of Section 56A of the Development Act 1993*

TO BE HELD IN

**COUNCIL CHAMBERS  
PLAYFORD CIVIC CENTRE  
10 PLAYFORD BOULEVARD, ELIZABETH**

MEMBERS MAY PARTICIPATE BY ELECTRONIC MEANS

ON

**MONDAY, 20 JULY 2020 AT 6:00PM**

THIS MEETING WILL ALSO BE VIEWABLE AT  
<https://www.youtube.com/user/CityOfPlayford>

A handwritten signature in blue ink that reads "S Green".

**SAM GREEN  
CHIEF EXECUTIVE OFFICER**

Issue Date: Thursday, 16 July 2020

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### MEMBERSHIP

**MR GEOFF PARSONS – PRESIDING MEMBER**

Mr Stephen Coppins

Mr Nathan Grantham

Mr Paul Mickan

Ms Olivia Franco (*Deputy*)



**City of Playford  
Council Assessment Panel Meeting**

**AGENDA**

**MONDAY, 20 JULY 2020 AT 6:00PM**

**1 ATTENDANCE RECORD**

- 1.1 Present
- 1.2 Apologies
- 1.3 Not Present

**2 CONFIRMATION OF MINUTES**

**RECOMMENDATION**

The Minutes of the Council Assessment Panel Meeting held 15 June 2020 be confirmed as a true and accurate record of proceedings.

**3 APPLICATIONS WITHDRAWN**

**4 DECLARATIONS OF INTEREST**

**5 APPLICATIONS FOR CONSIDERATION – PERSONS WISHING TO BE HEARD**

- 5.1 Construction of a telecommunications facility and associated fencing DA  
292/1594/2019 (Attachments) .....6

**Representors:**

**Wishing to be heard**

Andrew Odzierejko and Sandra Schwerdt  
Stephen and Pauline Hart  
Geoffrey Scott (represented by Stephen Hart)  
Metodia Smout  
Denis and Rosemary O'Brien  
Mark and June Holland  
Annette Timpano  
Claire Sutton and Carl Burridge  
Bradley and Renee Possingham (Represented by  
Planning Solutions)  
Andrew Bellamy  
Colin Cameron

**Not wishing to be heard**

Salvatore Papalia  
Tanya Randall  
Ian and Pam Shiels  
Alan and Terrie Cork

**Applicant:**

Telstra Corp Pty Ltd

**6 APPLICATIONS FOR CONSIDERATION – NO PERSONS TO BE HEARD**

Nil

**7 APPLICATIONS FOR CONSIDERATION - CATEGORY 1**

Nil

**8 OUTSTANDING MATTERS – APPEALS AND DEFERRED ITEMS**

Nil

**9 OTHER BUSINESS**

**9.1 STAFF REPORTS**

Nil

**10 CONFIDENTIAL MATTERS**

Nil

**11 DEVELOPMENT PLAN POLICY DISCUSSION FORUM**

Nil

**12 CLOSURE**

# **APPLICATIONS FOR CONSIDERATION**

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## **APPLICATIONS FOR CONSIDERATION – PERSONS WISHING TO BE HEARD**

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## 5.1 CONSTRUCTION OF A TELECOMMUNICATIONS FACILITY AND ASSOCIATED FENCING DA 292/1594/2019

### Snapshot

<b>Author:</b>	Megan Leverington
<b>Proposal:</b>	Construction of a telecommunications facility and associated fencing
<b>Development Number:</b>	292/1594/2019
<b>Date of Lodgement:</b>	10 October 2019
<b>Owner:</b>	Mr and Mrs Lombardo
<b>Applicant:</b>	Telstra Corp Pty Ltd
<b>Location:</b>	286 Craigmore Road, Uleybury
<b>Zone:</b>	Hills Face and Residential Hills
<b>Classification:</b>	Non-Complying
<b>Public Notification Category:</b>	3
<b>Representation Received:</b>	Yes
<b>Development Plan:</b>	Consolidated 29 August 2019
<b>Request for Additional Information Made?</b>	Yes
<b>Recommendation:</b>	To Grant Development Plan Consent

<b>Attachments:</b>	1 <a href="#">↓</a> . Development Application Form
	2 <a href="#">↓</a> . Certificate of Title
	3 <a href="#">↓</a> . Zone Map
	4 <a href="#">↓</a> . Bushfire Protection Area Map
	5 <a href="#">↓</a> . Amended Site Plan
	6 <a href="#">↓</a> . Superseded Site Plan
	7 <a href="#">↓</a> . Elevation Plans
	8 <a href="#">↓</a> . Site Works Plan
	9 <a href="#">↓</a> . Statement of Effect
	10 <a href="#">↓</a> . Reps Received 27 Nov 19 Notification Period
	11 <a href="#">↓</a> . Response to Reps Received 27 Nov 19 Notification Period
	12 <a href="#">↓</a> . Reps Received 19 May 20 Notification Period

### 1. The Subject Land

The subject land is triangular in shape, with a slight western slope and is located on the southern side of Craigmore Road and the western side of Vivian Road, in the suburb of Uleybury. The allotment features a frontage of approximately 260m to Craigmore Road, a frontage of approximately 418m to Vivian Road and an average depth of 150m, with an overall area of approximately 50,000m<sup>2</sup> (Attachment 2).

The subject land is used for rural residential purposes and currently contains a detached dwelling and associated outbuildings. Mature trees, some of which are deceased, are located towards the Vivian and Craigmore Road boundaries, whilst the southern and western portions of the land remain vacant.

## 2. The Locality

Based on the visibility of the allotment, the extent of the locality is considered to include the subject land, the allotments north of Craigmore Road, the allotments east and west of Grandview Place, the allotments east of Craigmore Road, the allotments east of Vivian Road, and the allotments east and west of Birmingham Drive, Manchester Court and Gloucester Drive.

### 2.1 Locality Plan



The locality contains medium sized residential allotments in the Residential Hills Zone and large rural living and vacant grazing allotments in the Hills Face Zone.

The established residential allotments are located in the suburb of Craigmore and range in size from 400m<sup>2</sup> to over 1,000m<sup>2</sup>. They accommodate detached dwellings, swimming pools, ancillary outbuildings and verandahs, with landscaped front and rear yards.

The large rural living allotments range in size from 42,000m<sup>2</sup> to 89,000m<sup>2</sup> and accommodate detached dwellings, ancillary outbuildings and verandahs, small vineyards and animal keeping. Vegetation on these allotments consists of mature trees, which are predominantly located towards the front half of the allotments.

The vacant grazing allotments remain undeveloped and maintain a significant landscape value to the locality.

## 2.2 Zoning

The subject land is depicted on Zone Map Play/23 in the Mapping Section of the Development Plan (Attachment 3).

By virtue of its location, the land is predominantly located within the Hills Face Zone, with a minor portion of the sites western extent located within the Residential Hills Zone.

As the location of the telecommunications facility is contained wholly within the Hills Face Zone, the proposal has been assessed against the provisions of this Zone. Notwithstanding this point, consideration has been given to general interface policies relevant to adjoining properties located within the Residential Hills Zone.

## 3. Background

The proposed development was first publicly notified on 27 November 2019, during which thirteen representations were received by Council, objecting to the development (Attachment 10).

Following interface concerns raised by Council staff, and upon review of the public submissions received from adjoining residential properties, the Applicant submitted amended plans, moving the proposed development a further 50 metres east than what was originally proposed (Attachments 5 and 6).

Due to the amended plans received, Council re-notified the application on the 19 May 2020 and received two new representations objecting to the development (Attachment 12). Seven representors who previously objected to the development also re-submitted representations (Attachment 12) objecting to the amended location (Attachment 5).

Although the application was re-notified, all representations received from the 27 November 2019 and 19 May 2020 public notification period are considered valid and have been considered in the assessment of this proposed development, as well as the Applicant's response to these representations (Attachments 10, 11 and 12).

## 4. The Proposal

It is considered that the proposal is best described as follows:

*“Construction of a telecommunications facility and associated fencing”.*

The facility comprises the following;

- A 30m high concrete monopole, with an overall height no greater than 31.4m (top of antennas);
- A triangular headframe attached to the top of the pole, supporting nine panel antennas (no greater than 2.8m in length);

- Nine Remote Radio Units (RRUs) to be attached to the proposed headframe adjacent to the antennas;
- Ancillary equipment and cabling;
- A 3m high 3.15m x 2.38m equipment shelter;
- A 6m x 10m compound, fenced by 2.4m high chain link mesh security fencing, with a 3m wide double access gates; and
- Associated works such as an access track and minor earthworks for foundations.

The Applicant seeks to provide improved telecommunications and data coverage for the growing needs of the established residential area of Craigmore, as well as providing enhanced in-building coverage to these homes. The coverage zone being targeted in particular is the residential area surrounded by Craigmore and Adams Road.

The proposed facility will add social and economic benefits to the community, ensuring uninterrupted coverage for phone and internet at all times for current and future users. The required objective cannot be achieved using only the existing surrounding telecommunication sites, due to terrain limitations and network constraints.

The proposal will form part of Telstra's NextG network solution to Craigmore and the surrounding areas and will deliver essential mobile services and high-speed wireless internet. Telstra's NextG Network is Australia's largest and fastest national mobile broadband network and due to terrain limitations and network constraints, more network facilities located closer together are required to ensure a high-quality signal strength, in order to achieve reliable service and the fastest possible data transfer rates.

## 5. Procedural Matters

### 5.1 Classification

The Hills Face Zone assigns a transmitting station as a *Non-Complying* form of development, with no exceptions.

This proposal has been determined as *Non-Complying*, as a telecommunications facility is a transmitting station that sends out or transmits radio waves for telephone and internet.

### 5.2 Public Notification

Due to the development not being assigned a Category under paragraph (a) or (b) of Section 38(1) of the *Development Act 1993*, it has been dealt with as a Category 3 development pursuant to Section 38(2)(c) of the *Development Act 1993*.

On the 27 November 2019, fifty four properties were notified of the development and an advertisement was placed in The Advertiser. Thirteen representations objecting to the development were received by Council (Attachment 10) and are summarised as follows:

Representor	Issues Raised
Andrew Odzierenko and Sandra Schwerdt	<ul style="list-style-type: none"> <li>• View will be compromised;</li> <li>• Natural outlook of land will be impacted upon due to height of tower;</li> <li>• Too close to residential properties;</li> <li>• De-value property price;</li> <li>• Concerned about health issues due to radiation.</li> </ul>
Tanya Randall	<ul style="list-style-type: none"> <li>• Property de-value.</li> </ul>

Stephen and Pauline Hart	<ul style="list-style-type: none"> <li>• 10m building exclusion zone at the rear of properties along Birmingham Drive – double standards with rules;</li> <li>• Visual impact from rear of property;</li> <li>• Health impacts;</li> <li>• Property de-value;</li> <li>• Further antenna structures can be added if Council approves this tower.</li> </ul>
Geoffrey Scott	<ul style="list-style-type: none"> <li>• Location should be further away from homes.</li> </ul>
Metodia Smout	<ul style="list-style-type: none"> <li>• Property de-value;</li> <li>• Health implications;</li> <li>• Visual impact on the beautiful landscape.</li> </ul>
Denis and Rosemary O'Brien	<ul style="list-style-type: none"> <li>• Bought property due to no further development allowed in Hills Face Zone – double standards with rules;</li> <li>• Non-Complying means not a structure that should be allowed;</li> <li>• Will have substantial impact on environment and visual landscape;</li> <li>• Existing vegetation will not obscure the 31m tall pole, at least 15m of it will be totally visible due to its height and the existing vegetation is dead or dying;</li> <li>• Property de-value;</li> <li>• Future co-location opportunities will increase visual impact;</li> <li>• Noise impacts from air-conditioning equipment.</li> </ul>
Mark and June Holland	<ul style="list-style-type: none"> <li>• Bought property due to no further development allowed in Hills Face Zone – double standards with rules;</li> <li>• Impact on view of natural landscape;</li> <li>• Property de-value;</li> <li>• Health concerns.</li> </ul>
Ian and Pam Shiels	<ul style="list-style-type: none"> <li>• To close to surrounding residential homes;</li> <li>• Visual impacts;</li> <li>• Was informed no further development could occur behind property – double standards with rules;</li> <li>• Property de-value;</li> <li>• Health concerns.</li> </ul>
Alan and Terrie Cork	<ul style="list-style-type: none"> <li>• Visual impacts;</li> <li>• Property de-value.</li> </ul>
Annette Timpano	<ul style="list-style-type: none"> <li>• Property de-value;</li> <li>• Visual impacts.</li> </ul>
Claire Sutton and Carl Burridge	<ul style="list-style-type: none"> <li>• To close to residential properties;</li> <li>• Property de-value;</li> <li>• Visual impacts on natural landscape;</li> <li>• Potential noise and light impacts from tower and associated infrastructure on residents.</li> </ul>

Bradley and Renne Possingham	<ul style="list-style-type: none"> <li>• Visual impacts;</li> <li>• Impact on natural environment including wildlife;</li> <li>• To close to residential properties;</li> <li>• Property de-value.</li> </ul>
Andrew Bellamy	<ul style="list-style-type: none"> <li>• To close to residential properties;</li> <li>• Negative visual impact;</li> <li>• Another tower is already constructed on Craigmore Road which should provide sufficient coverage for Craigmore;</li> <li>• Council should consider Candidate F as this poses less visual impact.</li> </ul>

The Applicant's Planning Consultant Clinton Northey responded to the representations received (Attachment 11) and this response is summarised as follows:

- Visual impacts cannot be completely mitigated due to clear line of sight being integral to the functioning of the telecommunications facility;
- The height of the tower is at the minimum height capable of achieving technical requirements for the site and cannot be reduced further as the panel antennas must be at a height where there are no obstructions between them and the service area;
- Telstra is willing to paint the facility a colour suitable to Council to further reduce visual impacts;
- The site of the facility has been located to maximise the existing vegetation for screening the facility;
- The telecommunications facility must comply with Australia's Safety Regulations;
- The Environmental Electromagnetic Energy Report for this facility illustrates the estimated maximum radiofrequency levels will be less than 1% of the Australian Standard;
- There is no scientific evidence that exposure to levels below the guidelines carries any known health risks;
- Telstra is not aware of any credible evidence that directly links the siting of a telecommunications facility to an increase or decrease in property prices;
- There will be some low level noise from the air conditioning equipment contained within the equipment shelter however this would be comparable to that of a domestic air conditioning unit and should accord with relevant standards; and
- Numerous sites were considered for the telecommunications facility but all others were ruled out due to unwilling land owners, site constraints and radio frequency coverage.

Due to the amended location of the telco tower, Council re-notified the application.

On the 19 May 2020, fifty four properties were notified of the development and an advertisement was placed in The Advertiser. Nine representations objecting to the development were received by Council (Attachment 12); two new representations and seven previous representations (Attachment 12) and these are summarised as follows:

<b>Representor</b>	<b>Issues Raised</b>
Andrew Odzierenko and Sandra Schwerdt	<ul style="list-style-type: none"> <li>• Additional 50 metres is still not an adequate distance;</li> <li>• View will be compromised;</li> <li>• Natural outlook of land will be impacted upon due to height of tower;</li> <li>• Too close to residential properties;</li> <li>• De-value property price;</li> <li>• Concerned about health issues due to radiation.</li> </ul>
Stephen and Pauline Hart	<ul style="list-style-type: none"> <li>• Previous reasons for objection listed below still stand despite additional distance suggested in the updated application;</li> <li>• While it is located within a residential area it is not acceptable;</li> <li>• Size of tower could increase once initial approval is granted.</li> </ul> <p>Previous reasons for objection:</p> <ul style="list-style-type: none"> <li>• 10m building exclusion zone at the rear of properties along Birmingham Drive – double standards with rules;</li> <li>• Visual impact from rear of property;</li> <li>• Health impacts;</li> <li>• Property de-value;</li> <li>• Further antenna structures can be added if Council approves this tower.</li> </ul>
Denis and Rosemary O'Brien	<ul style="list-style-type: none"> <li>• New sighting/location does not change any of our concerns previously given.</li> </ul> <p>Previous reasons for objection:</p> <ul style="list-style-type: none"> <li>• Bought property due to no further development allowed in Hills Face Zone – double standards with rules;</li> <li>• Non-Complying means not a structure that should be allowed;</li> <li>• Will have substantial impact on environment and visual landscape;</li> <li>• Existing vegetation will not obscure the 31m tall pole, at least 15m of it will be totally visible due to its height and the existing vegetation is dead or dying;</li> <li>• Property de-value;</li> <li>• Future co-location opportunities will increase visual impact;</li> <li>• Noise impacts from air-conditioning equipment.</li> </ul>

Mark and June Holland	<ul style="list-style-type: none"> <li>• Visible from our home;</li> <li>• De-value our home; and</li> <li>• Previous reasons for objection are still relevant.</li> </ul> <p>Previous reasons for objection:</p> <ul style="list-style-type: none"> <li>• Bought property due to no further development allowed in Hills Face Zone – double standards with rules;</li> <li>• Impact on view of natural landscape;</li> <li>• Property de-value;</li> <li>• Health concerns.</li> </ul>
Mark and Annette Timpano	<ul style="list-style-type: none"> <li>• Proposed amended site will still be visible from our property;</li> <li>• Property value and re-sale potential will be impacted by the visible presence of proposed tower.</li> </ul>
Claire Sutton	<ul style="list-style-type: none"> <li>• Moving the tower 50m further east does not alter our reasons for objection;</li> <li>• Not suitable close to residential properties;</li> <li>• Tower will be visible from the street; and</li> <li>• Property de-value and saleability of properties in the vicinity will be negatively impacted.</li> </ul>
Bradley and Renne Possingham	<ul style="list-style-type: none"> <li>• High visual impact;</li> <li>• Impact on native wildlife in the area;</li> <li>• To close to existing house;</li> <li>• Raises health concerns for local residents;</li> <li>• Decreases market value of our properties.</li> </ul>
Colin Cameron	<ul style="list-style-type: none"> <li>• Unsightly impact on community;</li> <li>• Inevitable depreciation of property value.</li> </ul>
Salvatore Papalia	<ul style="list-style-type: none"> <li>• Health concerns.</li> </ul>

Due to these representations mirroring the issues previously raised, the Applicant's Planning Consultant Clinton Northey did not provide a response to these representations as they have already been addressed in his previous response (Attachment 11).

Although the application was re-notified, Council has deemed all representations received from the 27 November 2019 and 19 May 2020 public notification period to be valid and they have been considered in the assessment of this proposed development, as well as the Applicant's response to these representations (Attachments 10, 11 and 12).

During the public notification periods, two common concerns unrelated to a planning consideration were raised in the representations; the impact the proposed telecommunications facility could have on property values and possible health impacts. Whilst Council understands and is empathetic to the perceived concerns raised, these two matters are not valid planning considerations.

In regards to property values, it is not a matter the Environmental, Resources and Development Court (ERDC) would generally entertain and certainly not in the absence of any expert advice or documentation *Lazzarino v Campbell town CC [2015] SAERDC 5 at [71]*. Furthermore, the proposed development does not diminish the representors' prospects of achieving optimal use of their properties in accordance with the relevant

zone policies, the foundation of their land's site value *Lazzarino v Campbell town CC [2015] SAERDC 5 at [71]*.

Fear of, and even actual, reductions in property value are rarely relevant in deciding a development application: *St Raphael's School v Unley CC [1995] EDLR 113; (1995) 2 SAPED 24; Heard v Doncaster and Templestowe CC (1986) 23 APA 139*. It has been held that, where a Development Plan referred to land values only in an oblique and inferential way, any attempt to link development proposals and the likely value of nearby properties if development consent were to be granted would, if it were at all possible, need specialised evidence from experts, including planners, valuers and land economists: *Meyer v Northern Areas C [1998] EDLR 182; (1998) 5 SAPED 38; Lazzarino v Campbell town CC [2015] SAERDC 5 at [71]*  
*Presidian. 2020. Planning Law SA. [ONLINE] Available at: <https://www.presidian.com.au/plsa/annotated-development-act-1993-3/part-4-development-assessment/division-1-general-scheme/subdivision-1-approvals#toc129>. [Accessed 23 June 2020].*

In regards to health impacts, Telecommunication facilities must comply with Australia's Safety Regulations RPS3 set by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA). These Regulations have adopted an environmental standard that limits the network signal strength to a level low enough to protect all people, in all environments, 24 hours a day.

The maximum radiofrequency (RF) electromagnetic energy (EME) levels of the proposed facility at the surrounding areas are estimated to be only 1% of this standard. The maximum EME level is calculated on a worst case scenario that assumes the facility is operating at maximum power.

There is also no scientific evidence to state that exposure to EME levels below the standard carries any known health risk to adults or children, the facility does comply with relevant standards and there is no expert advice to the contrary.

### 5.3 Statutory Referrals

No Statutory Referrals were triggered by the proposed development.

## 6. Key Issues

The following matters are considered pertinent in reaching a recommendation for the proposal:

- Whether the proposed development is consistent with the Desired Character of the Hills Face Zone;
- Whether the proposed development will have a visual impact on the locality;
- Whether the proposed development meets the communication needs of the community;
- Whether alternative sites or co-location opportunities were considered for the proposed development; and
- Whether the proposed development creates an unacceptable risk in the event of a bushfire.

## **7. Planning Assessment**

### **7.1 Consistency with Desired Character of Hills Face Zone**

Development undertaken in the Hills Face Zone should not only preserve, but should also enhance the natural character of the zone or assist in the re-establishment of a natural character. The term “natural character” refers to the natural topography, native vegetation and colours, such as greens and browns of non-reflective earthen tones, normally associated with a natural landscape. Additionally, natural character refers to the open character of the land in those areas of the zone, where open grazing currently predominates.

The subject land does not have an open character and it is not an open grazing allotment. It is currently used for rural residential purposes and contains a detached dwelling and associated outbuildings, with mature trees located towards the Vivian and Craigmore Road boundaries. Notwithstanding this, the surrounding land to the north and east is open in nature, against which the development will have a level of visual impact.

Whilst the construction of a telecommunications facility will not assist in re-establishing an open character for the land, the facility is proposed to be located amongst the existing mature trees towards Craigmore Road, where there is not currently an open character. The development will not require the clearance of any existing vegetation and will utilise the existing mature trees to assist in providing screening to the plant equipment and fencing. It should also be noted that there are existing power poles along this side of Craigmore Road, which further impede on the open character of the subject land.

The proposed monopole will comprise of a galvanised steel finish, which will fade to a non-reflective light grey colour within approximately twelve months from construction. This colour is considered to be similar to the earthy tones found throughout the colour palette of the existing landscape and will ensure the natural character is maintained. Although Council is satisfied with this fading due to a more natural colour and less maintenance, the Applicant has offered to paint the monopole a colour of Council's choosing, should this be deemed a more appropriate way to reduce the immediate visual impact of galvanised steel and ensure the natural character is maintained.

The natural topography of the land will also not be altered as a result of the proposed development. There is no cut or fill of the land proposed and the crossover and access track to the proposed facility will be constructed of compacted rubble, similar to driveways in the locality and will follow the natural contours of the land.

Whilst the proposed development will be an additional element on the subject land, on balance, the proposal is not significantly inconsistent with the Desired Character of the Hills Face Zone.

### **7.2 Visual impact on the locality**

Telecommunication facilities should be sited and designed to minimise the visual impact on the amenity of the local environment. They should use materials and finishes that minimise visual impact and incorporate landscaping to screen the development, particularly equipment shelters and huts.

Due to the undulating topography of the locality, the Applicant is limited in their ability to lower the height of the facility. This is because the panel antennas must be at a height where there are no obstructions between the antenna and the service area. In order to achieve the technical requirements for the targeted coverage area, a 30m tower is considered to be the minimum height capable of achieving this.

The Applicant has sought to balance the need for the height with the amenity of the local environment, by using a slimline monopole design, over a broad triangle lattice tower to further reduce the visual impact. The proposed monopole will comprise of a galvanised steel finish, which will fade to a non-reflective light grey colour within approximately twelve months from construction. This colour is considered to reflect similar earthy tones found throughout the colour palette of the existing landscape.

The site of the proposed telecommunications facility will also assist in reducing the visual impact to the amenity of the locality. The proposed location provides natural screening opportunities due to the existing mature trees and whilst it is acknowledged that these trees are not of a height to screen the 30m monopole, they will assist in screening the equipment shelter and fenced compound.

On balance, the proposal is considered to satisfy Objective 2 and PDC 1(b), (f) and (g) of the Telecommunications Facilities Section of the General Section of the Development Plan.

### **7.3 Meets the communication needs of the community**

The Applicant seeks to provide improved telecommunications and data coverage within an established residential area of Craigmore, as well as providing enhanced in-building coverage to these homes. The coverage zone being targeted in particular is the residential area surrounded by Craigmore and Adams Road.

The proposed facility will add social, economic and personal benefits to the community within the locality by providing the opportunity to work and study from home, ensuring uninterrupted coverage for phone and internet for home businesses, ensuring access to phone services at all times, especially for emergencies and providing greater accessibility to the internet, particularly for educational purposes.

The proposed site was chosen because of its suitable proximity and being able to fully cover the target area, whilst at the same time having the least visual impact from all alternative sites.

Accordingly, this development is considered to meet Objective 1 and PDC 1(a) of the Telecommunications Facilities General Section of Council's Development Plan.

### **7.4 Alternative sites and co-location opportunities**

Principle of Development Control (PDC) 1(e) of the Telecommunications Facilities General Section of Council's Development Plan encourages telecommunication facilities, where technically feasible, to be co-located with other telecommunication facilities.

The Applicant investigated and identified two possible co-location sites, located within close proximity to the targeted coverage area. Unfortunately, it was determined that the two identified sites, being Telstra and Optus facilities, were not suitable. The Telstra facility was discounted as it was not capable of achieving the coverage requirements and the Optus facility is no longer being developed and did not provide room on the allotment for a new facility.

A representor also highlighted an existing facility on Craigmore Road where they believed co-location could occur. Unfortunately, this site was discounted due to the topography of the area, creating network constraints and the facility not being able to meet the coverage requirements. In order to meet the coverage requirements, the tower would need to be significantly increased in height to ensure the panel antennas are at a height where there are no obstructions between the antenna and the service area. This would result in a substantial increase in its visual impact and was considered inappropriate for the locality.

Thirteen other locations were also considered as possible sites for the proposed telecommunications facility. These have been identified in the application as A,B,C,D,E,F,G,H,I,J,K,L and M (Attachment 9).

Sites A, B, C, D, E, F and G were discounted due to unwilling land owners and site H was not selected due to its close proximity to residential dwellings and the resultant visual impact, in comparison to the chosen site. Site I, which is located across the road from the chosen site, was not selected due to the slope of the land and the resultant visual impact, in comparison to the chosen site.

Site J is the chosen site and has been deemed the most appropriate in order to achieve the required coverage requirements, as well as being located the furthest away from residential dwellings and resulting in the least visual impact, compared to the other sites.

The remaining sites, K, L and M were discounted due to not meeting the coverage requirements.

The proposed site, identified as J, is deemed the most appropriate in this instance and provides an acceptable balance between required coverage requirements and impacts on the locality.

### **7.5 Risk in the event of a bushfire**

The subject land is depicted on BPA Map Play/8 in the Mapping Section of the Development Plan (Attachment 4). By virtue of its location, the land is entirely within the high bushfire risk area.

Objective 5 of the Hazards General Section of Council's Development Plan states development should be located to minimise the threat and impact of bushfires on life and property. The proposed telecommunications facility will provide improved mobile telecommunications and data coverage for the established suburb of Craigmore, which abuts the high bushfire risk area. This will assist in minimising the threat and impact of bushfires by providing an effective telecommunications network that will allow emergency services to be alerted to fire or medical emergencies, as well as notifying residents of nearby fire threats, updates or emergency announcements.

The Australian Communications and Media Authority reported that in 2014 – 2015, 66.9% of calls to 000 were made from mobile phones and previous bushfire incident reviews have demonstrated that effective telecommunications networks are essential for disaster response management.

PDC 17 of the Hazards General Section of Council's Development states buildings and structures should be designed and configured to reduce the impact of bushfire through using simple designs, which reduce the potential for trapping burning debris against the building or structure. The proposed telecommunications facility meets PDC 17 as it will not be constructed of flammable material, which could increase or affect the bushfire risk to the area and the design of a slim monopole and chain and wire fencing reduces the potential for trapping burning debris.

## 8. Conclusion

Despite the application being a *Non-Complying* form of development within the Hills Face Zone, the proposed development is considered appropriate in this instance.

Although the proposed telecommunications facility will be a new visual element in the locality, the Applicant has sought to balance technical need with amenity by offsetting its visual impacts through incorporating a slimline monopole design, appropriate colours and materials and siting. The natural topography of the land will not be altered, no vegetation will be removed and the existing mature trees will assist in screening the facility.

Even though numerous representors raised the matter of property value impacts as a result of the proposed telecommunications facility, this is not a planning consideration and is not relevant in deciding on this development application.

The concerns raised by the representations have been addressed by the planning consultant and in the body of this report.

On balance, the proposal does not detrimentally affect the amenity of the area and is not seriously at variance with Council's Development Plan. On this basis I recommend that the application be granted Development Plan Consent, subject to the concurrence of the State Planning Commission and conditions below.

## 9. Recommendation

### STAFF RECOMMENDATION

That pursuant to the authority to the Council Assessment Panel by the Council, it is recommended that the Council Assessment Panel:

- A. DETERMINES that the proposed development is not seriously at variance with the policies in the Playford Council Development Plan; and
- B. GRANTS Development Plan Consent, subject to the concurrence of the State Planning Commission, to the application by Telstra Corp Pty Ltd for construction of a telecommunications facility and associated fencing at 286 Craigmere Road, Uleybury as detailed in Development Application 292/1594/2019 subject to the following conditions:
  1. The development must be undertaken, completed and maintained in accordance with the plan(s) and information detailed in this application.
  2. Any proposed new crossing place shall meet the minimum standard of design and construction as detailed on City of Playford drawings.

These are available from Councils website under:  
[www.playford.sa.gov.au/standarddrawings](http://www.playford.sa.gov.au/standarddrawings)

*Reason: To maintain consistency of the streetscape and protect the infrastructure within the road verge.*

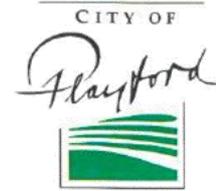
**CALL**  
(08) 8256 0333

**POST**  
12 Bishopstone Road  
Davoren Park SA 5113

**EMAIL**  
playford@playford.sa.gov.au

**VISIT**  
Playford Civic Centre  
10 Playford Boulevard  
Elizabeth SA 5112

Stretton Centre  
307 Peachey Road  
Munno Para SA 5115



# DEVELOPMENT APPLICATION FORM

1. Application type	
<input type="checkbox"/> Planning and building consent	<input type="checkbox"/> Building consent privately certified
<input checked="" type="checkbox"/> Planning consent only	<input type="checkbox"/> Residential Code (Council assessed)
<input type="checkbox"/> Building consent only (Schedule 1A)	

2. Applicant details	
Family name: <i>Telstra Corporation Pty Ltd</i>	Given name/s: <i>J. Vironvirean Australian Pty Ltd</i>
Postal address: <i>Locked Bag 4001 Moorabbin Vic</i>	Post code: <i>5114</i>
Email: <i>clinton.northey@viconvirean.com.au</i>	Phone: <i>(03) 8547 7911</i>

3. Owner details		<input type="checkbox"/> As above
Family name: <i>hombardo</i>	Given name/s: <i>Frank + Antonella</i>	
Postal address: <i>286 Cragmore Rd, Weyburn</i>	Post code: <i>5114</i>	
Email:	Phone:	

4. Contact person for further information		<input checked="" type="checkbox"/> As per applicant/owner
Family name: <i>Northey</i>	Given name/s: <i>Clinton</i>	
Postal address: <i>Locked Bag 4001 Moorabbin</i>	Post code: <i>3189</i>	
Email: <i>clinton.northey@viconvirean.com.au</i>	Phone: <i>(03) 8547 7911</i>	

5. Description of proposed development	
Description of development: <i>Construction of 30m Telstra Telecommunications monopole</i>	
Intended use: <i>Telecommunications Base Station</i>	
Floor area (Sqm): <i>60 sqm</i>	Building rules classification sought: <i>(eg. 1a, 10a)</i>
Development cost: \$ <i>250,000.00</i>	

6. Location of proposed development			
House No: <i>286</i>	Lot No: <i>100</i>	Title Volume/Folio: <i>DP 92156</i>	
Street: <i>Cragmore Road</i>	Suburb: <i>Weyburn</i>	Post code: <i>5114</i>	



7. Work type	
<input type="checkbox"/> New build	<input type="checkbox"/> Addition or alteration
<input type="checkbox"/> Demolition	<input checked="" type="checkbox"/> Other (Please specify) <i>Telecommunications facility</i>
Wall / Wall Cladding	
<input type="checkbox"/> Brick veneer	<input checked="" type="checkbox"/> Colorbond or steel
<input type="checkbox"/> Fibro-cement	<input type="checkbox"/> Not applicable
<input type="checkbox"/> Other (Please specify)	
Floors	
<input checked="" type="checkbox"/> Concrete	<input type="checkbox"/> Timber
<input type="checkbox"/> Other (please specify)	
Roof	
<input checked="" type="checkbox"/> Colorbond or steel	<input type="checkbox"/> Tiles
<input type="checkbox"/> Not applicable	<input type="checkbox"/> Other (please specify)
Frame	
<input checked="" type="checkbox"/> Steel	<input type="checkbox"/> Timber
<input type="checkbox"/> Other (please specify)	

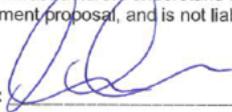
8. Builder/supervisor details		Registration no:	
Family name:		Given name/s:	
Postal address:		Post code:	
Email:		Phone:	

**9. Applicant Declaration**

**Building Near Power Lines and Underground Cables**  
 I declare that the proposed development will involve the construction of a building which would, if constructed in accordance with the plans submitted, not be contrary to the regulations prescribed for the purposes of section 86 of the *Electricity Act 1996*. I make this declaration under clause 2A(1) of Schedule 5 of the *Development Regulations 2008*.  
 NB: If this declaration is not made, a referral to the Office of the Technical Regulator is required.

**Copyright of Plans**  
 I acknowledge that copies of this application and supporting documentation may be provided to interested persons in accordance with the *Development Act 1993* and *Regulations 2008*. This includes display on Council's website and electronic media.

**Street Infrastructure and Driveways / Entrancesways**  
 I declare that I have examined the site of the application and drafted site plans and drainage plans for my proposal and to the best of my understanding acknowledge the proposed entrancesways, crossways and driveways are not less than one (1) metre from existing or proposed street infrastructure. In the event that a proposed entrancesway, crossway and/or driveway is less than 1 metre from existing or proposed street infrastructure, I will amend any such proposal to comply with the one (1) metre clearance required from such street infrastructure. I understand that the City of Playford is not obligated to relocate any street infrastructure as a result of my development proposal, and is not liable to meet any costs associated with the relocation of any street infrastructure.

Applicant's Signature:  Date: 3/10/19

**10. Payment information**

**CREDIT CARD PAYMENT – CARD TYPE:**  Visa  Mastercard

Card number:

Expiry Date: \_\_\_\_/\_\_\_\_/\_\_\_\_ Cardholder's Name: \_\_\_\_\_

Amount: \_\_\_\_\_ Signature: \_\_\_\_\_



**Product** Register Search (CT 6128/566)  
**Date/Time** 03/07/2020 03:29PM  
**Customer Reference** Telstra SN07420.01  
**Order ID** 20200703007876

REAL PROPERTY ACT, 1886



South Australia

The Registrar-General certifies that this Title Register Search displays the records maintained in the Register Book and other notations at the time of searching.



## Certificate of Title - Volume 6128 Folio 566

**Parent Title(s)** CT 5358/735  
**Creating Dealing(s)** RTD 12059827  
**Title Issued** 16/01/2014      **Edition** 2      **Edition Issued** 19/08/2019

### Estate Type

FEE SIMPLE

### Registered Proprietor

FRANK LOMBARDO  
 ANTONELLA LOMBARDO  
 OF LOT 5 CRAIGMORE ROAD ULEYBURY SA 5114  
 AS JOINT TENANTS

### Description of Land

ALLOTMENT 100 DEPOSITED PLAN 92156  
 IN THE AREA NAMED ULEYBURY  
 HUNDRED OF MUNNO PARA

### Easements

NIL

### Schedule of Dealings

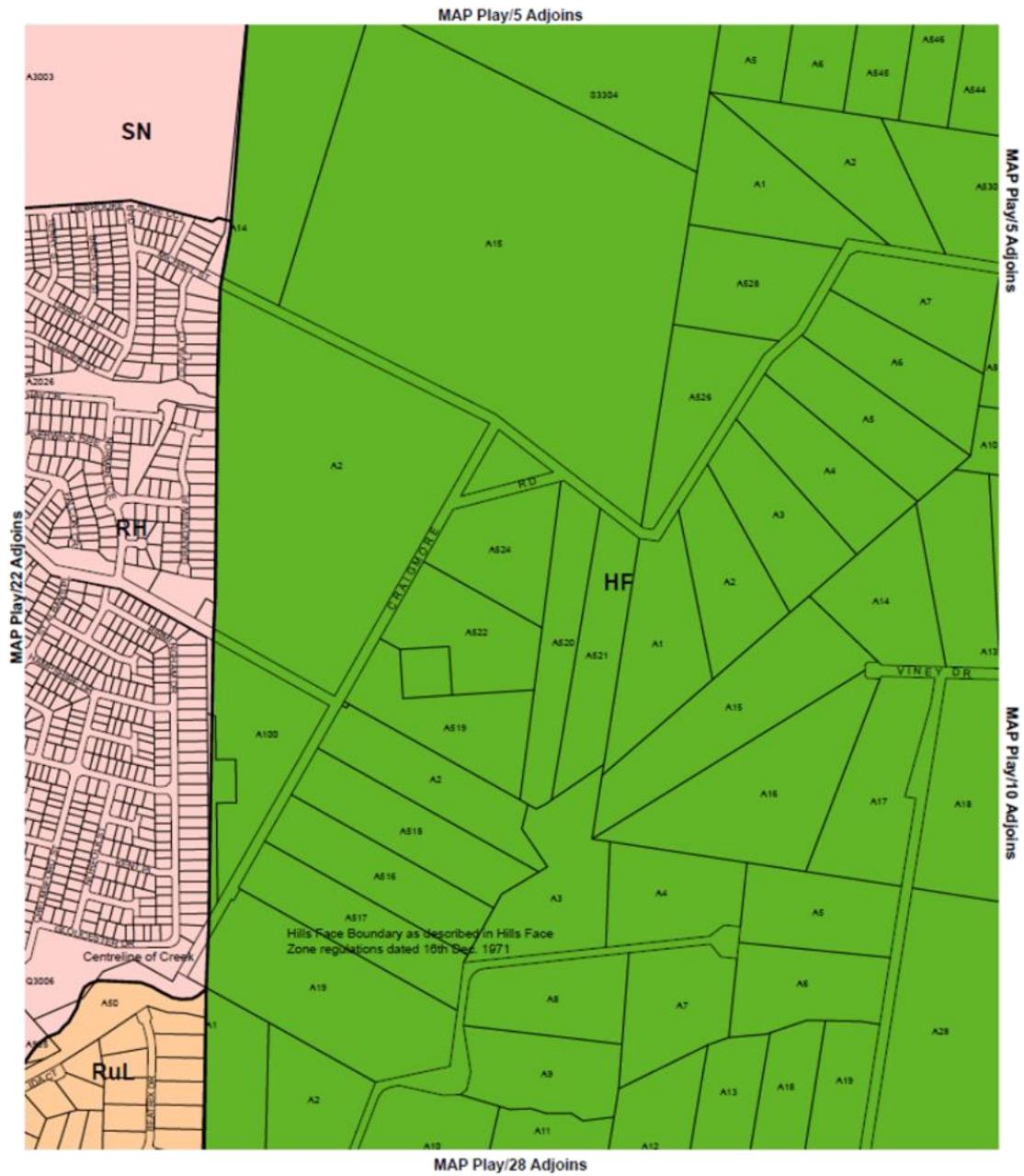
NIL

### Notations

**Dealings Affecting Title** NIL  
**Priority Notices** NIL  
**Notations on Plan** NIL  
**Registrar-General's Notes** NIL  
**Administrative Interests** NIL

PURPOSE: DIVISION  MAP REF: 6628/18/R  LAST PLAN:	AREA NAME: ULEYBURY  COUNCIL: CITY OF PLAYFORD  DEVELOPMENT NO:	APPROVED: GARY WOODCOCK 19/08/2013  DEPOSITED: MARK MCNEIL 31/12/2013	  <h2 style="margin: 0;">D92156</h2> SHEET 1 OF 2 <small>38439_text_01_v03_Version_3</small>																				
AGENT DETAILS: LESTER FRANKS 1ST FLOOR 22 CHANCERY LANE ADELAIDE SA 5000 PH: 08 8223 5220 FAX: 08 8223 5226  AGENT CODE: LFSG REFERENCE: FQFP0003		SURVEYORS CERTIFICATION: I DYLAN LUKE GATHERCOLE , a licensed surveyor do hereby certify - 1) That this plan has been made from surveys carried out by me or under my personal supervision and in accordance with the Survey Act 1992. 2) That the field work was completed on the 2nd day of August 2013 5th day of August 2013 Dylan Gathercole Licensed Surveyor																					
SUBJECT TITLE DETAILS: <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">PREFIX</th> <th style="text-align: left;">VOLUME</th> <th style="text-align: left;">FOLIO</th> <th style="text-align: left;">OTHER</th> <th style="text-align: left;">PARCEL</th> <th style="text-align: left;">NUMBER</th> <th style="text-align: left;">PLAN</th> <th style="text-align: left;">NUMBER HUNDRED / IA / DIVISION</th> <th style="text-align: left;">TOWN</th> <th style="text-align: left;">REFERENCE NUMBER</th> </tr> </thead> <tbody> <tr> <td>CT</td> <td>5358</td> <td>735</td> <td></td> <td>ALLOTMENT(S)</td> <td>181</td> <td>F</td> <td>162530 MUNNO PARA</td> <td></td> <td></td> </tr> </tbody> </table> OTHER TITLES AFFECTED:				PREFIX	VOLUME	FOLIO	OTHER	PARCEL	NUMBER	PLAN	NUMBER HUNDRED / IA / DIVISION	TOWN	REFERENCE NUMBER	CT	5358	735		ALLOTMENT(S)	181	F	162530 MUNNO PARA		
PREFIX	VOLUME	FOLIO	OTHER	PARCEL	NUMBER	PLAN	NUMBER HUNDRED / IA / DIVISION	TOWN	REFERENCE NUMBER														
CT	5358	735		ALLOTMENT(S)	181	F	162530 MUNNO PARA																
EASEMENT DETAILS: <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">STATUS</th> <th style="text-align: left;">LAND BURDENED</th> <th style="text-align: left;">FORM</th> <th style="text-align: left;">CATEGORY</th> <th style="text-align: left;">IDENTIFIER</th> <th style="text-align: left;">PURPOSE</th> <th style="text-align: left;">IN FAVOUR OF</th> <th style="text-align: left;">CREATION</th> </tr> </thead> <tbody> <tr> <td colspan="8" style="height: 100px;"> </td> </tr> </tbody> </table>				STATUS	LAND BURDENED	FORM	CATEGORY	IDENTIFIER	PURPOSE	IN FAVOUR OF	CREATION												
STATUS	LAND BURDENED	FORM	CATEGORY	IDENTIFIER	PURPOSE	IN FAVOUR OF	CREATION																
ANNOTATIONS: NO OCCUPATION ON SUBJECT LAND UNLESS OTHERWISE SHOWN ALLOTMENT 101 IS TO BE ACQUIRED BY THE COUNCIL FOR THE AREA																							





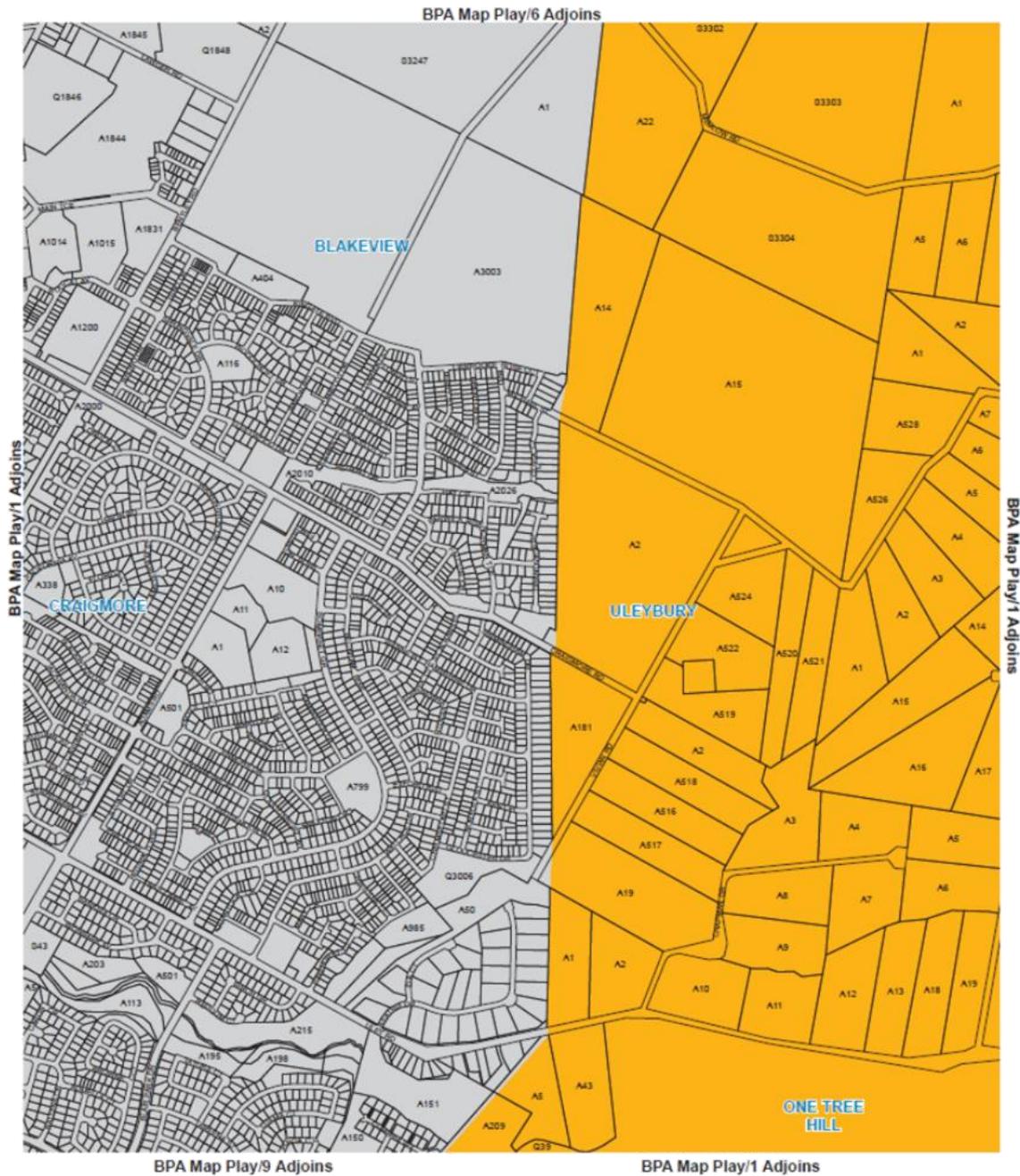
Lamberts Conformal Conic Projection, GDA84



- Zones**
- HF Hills Face
  - RH Residential Hills
  - SN Suburban Neighbourhood
  - RuL Rural Living
  - Zone Boundary

# Zone Map Play/23

PLAYFORD COUNCIL  
Consolidated - 29 August 2019



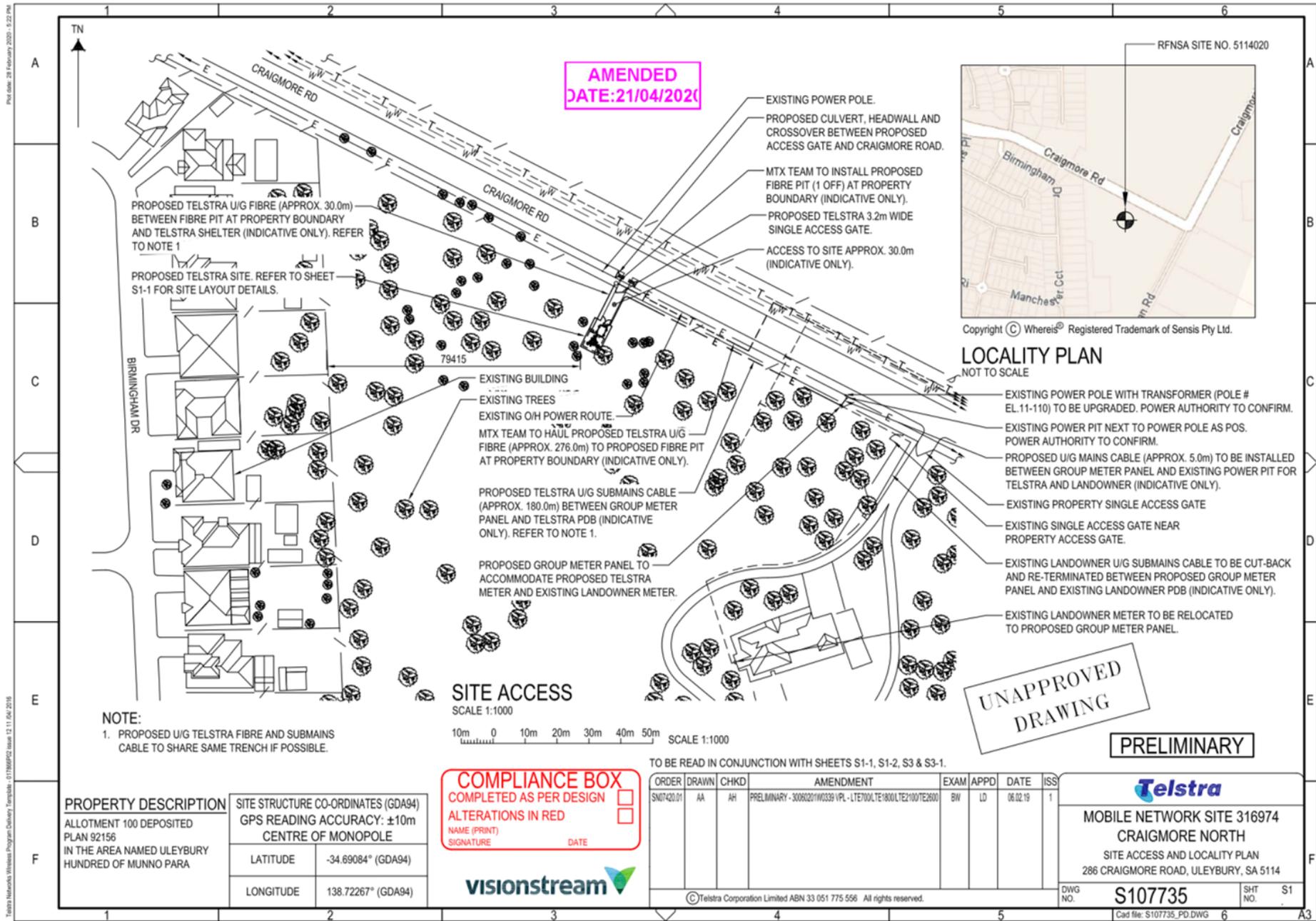
# Bushfire Protection Area

## BPA Map Play/8

### BUSHFIRE RISK

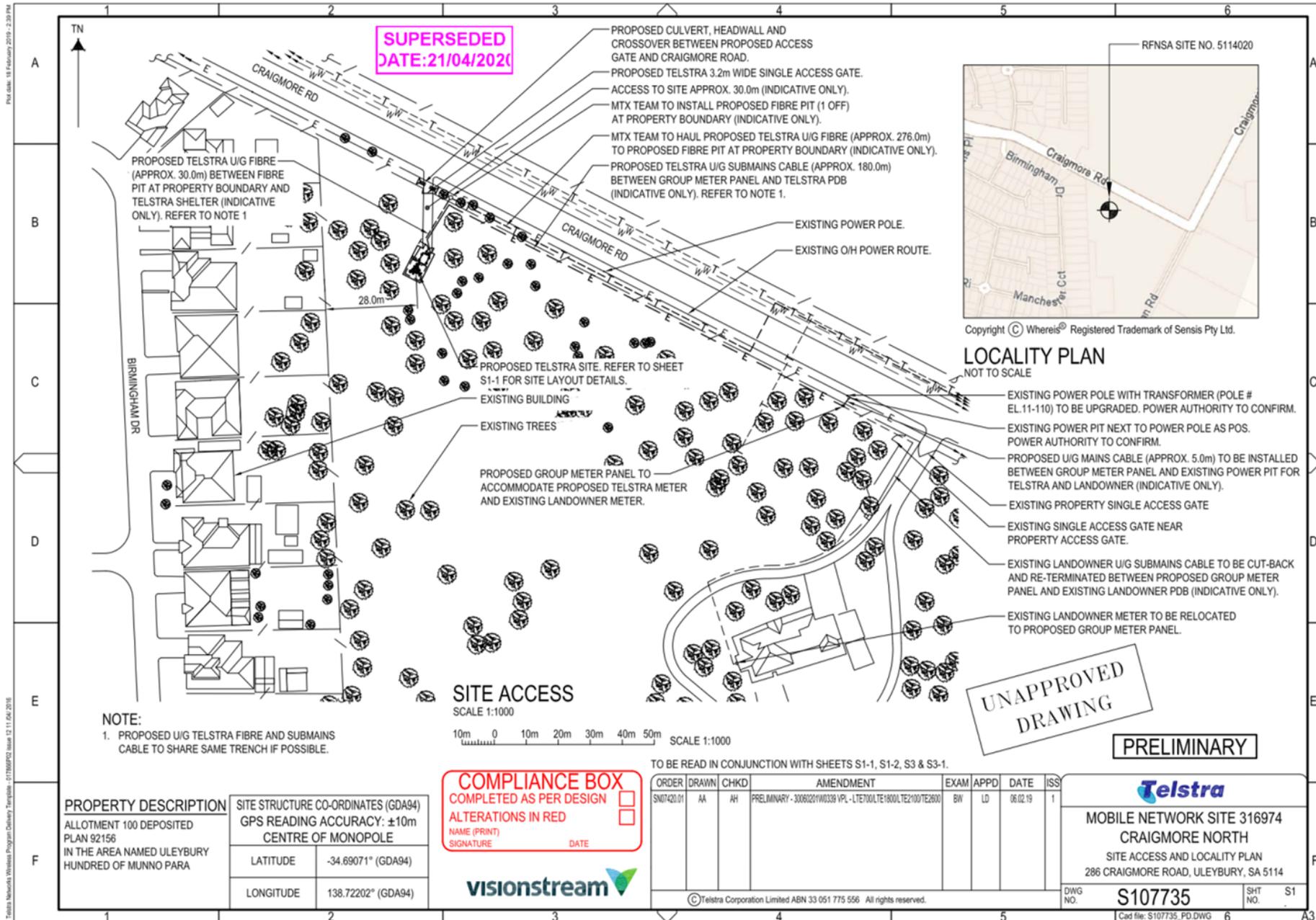
-  High Bushfire Risk
-  Excluded area from bushfire protection planning provisions

PLAYFORD COUNCIL  
Consolidated - 29 August 2019

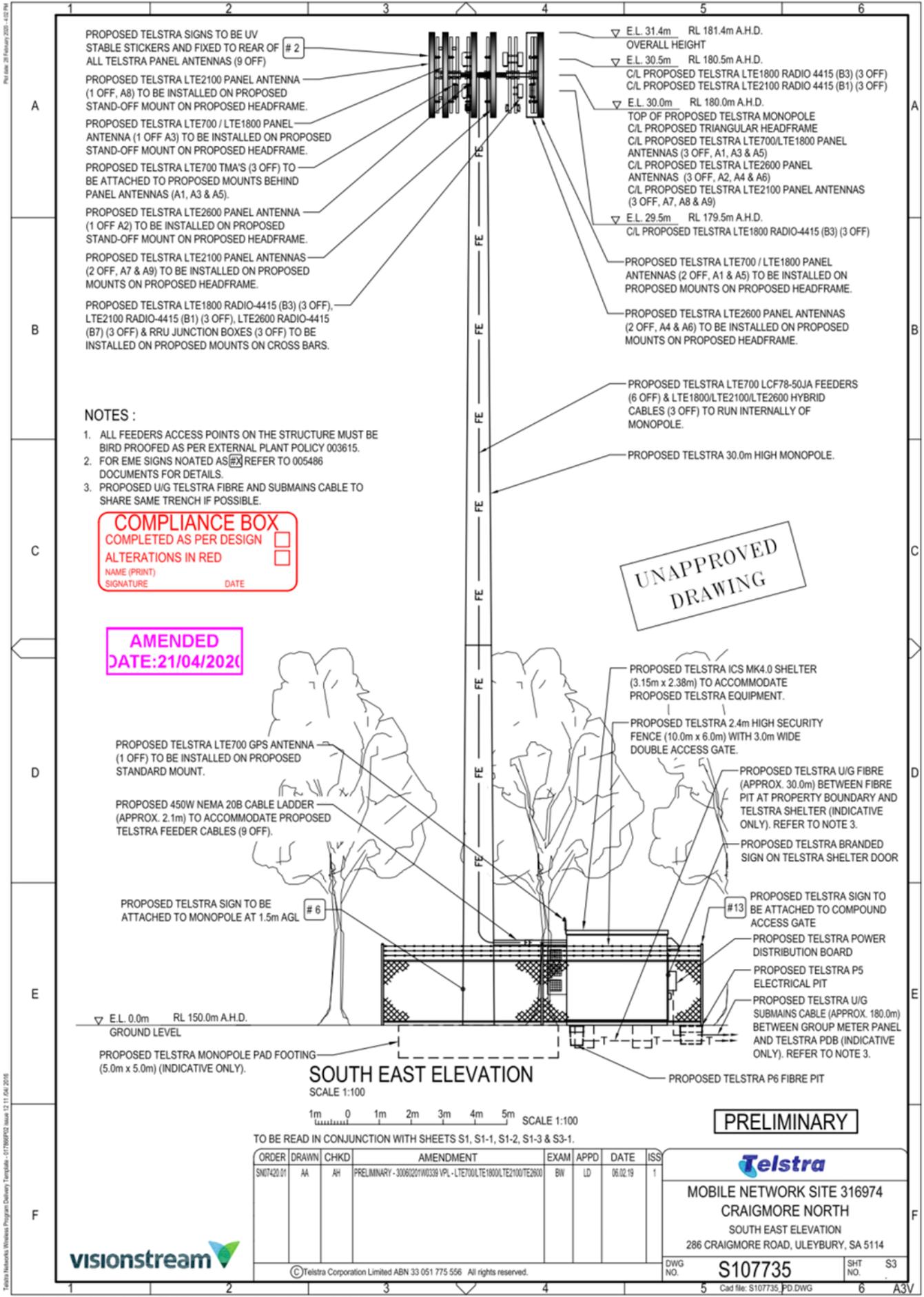


Telstra Networks Wireless Program Delivery Template - 011969P23 Issue 12 11/04/2016  
 Plot date: 28 February 2020 - 5:22 PM

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- PROPOSED TELSTRA SIGNS TO BE UV STABLE STICKERS AND FIXED TO REAR OF ALL TELSTRA PANEL ANTENNAS (9 OFF) # 2
- PROPOSED TELSTRA LTE2100 PANEL ANTENNA (1 OFF, A8) TO BE INSTALLED ON PROPOSED STAND-OFF MOUNT ON PROPOSED HEADFRAME.
- PROPOSED TELSTRA LTE700 / LTE1800 PANEL ANTENNA (1 OFF A3) TO BE INSTALLED ON PROPOSED STAND-OFF MOUNT ON PROPOSED HEADFRAME.
- PROPOSED TELSTRA LTE700 TMA'S (3 OFF) TO BE ATTACHED TO PROPOSED MOUNTS BEHIND PANEL ANTENNAS (A1, A3 & A5).
- PROPOSED TELSTRA LTE2600 PANEL ANTENNA (1 OFF A2) TO BE INSTALLED ON PROPOSED STAND-OFF MOUNT ON PROPOSED HEADFRAME.
- PROPOSED TELSTRA LTE2100 PANEL ANTENNAS (2 OFF, A7 & A9) TO BE INSTALLED ON PROPOSED MOUNTS ON PROPOSED HEADFRAME.
- PROPOSED TELSTRA LTE1800 RADIO-4415 (B3) (3 OFF), LTE2100 RADIO-4415 (B1) (3 OFF), LTE2600 RADIO-4415 (B7) (3 OFF) & RRU JUNCTION BOXES (3 OFF) TO BE INSTALLED ON PROPOSED MOUNTS ON CROSS BARS.

- E.L. 31.4m RL 181.4m A.H.D. OVERALL HEIGHT
- E.L. 30.5m RL 180.5m A.H.D.
- C/L PROPOSED TELSTRA LTE1800 RADIO 4415 (B3) (3 OFF)
- C/L PROPOSED TELSTRA LTE2100 RADIO 4415 (B1) (3 OFF)
- E.L. 30.0m RL 180.0m A.H.D.
- TOP OF PROPOSED TELSTRA MONOPOLE
- C/L PROPOSED TRIANGULAR HEADFRAME
- C/L PROPOSED TELSTRA LTE700/LTE1800 PANEL ANTENNAS (3 OFF, A1, A3 & A5)
- C/L PROPOSED TELSTRA LTE2600 PANEL ANTENNAS (3 OFF, A2, A4 & A6)
- C/L PROPOSED TELSTRA LTE2100 PANEL ANTENNAS (3 OFF, A7, A8 & A9)
- E.L. 29.5m RL 179.5m A.H.D.
- C/L PROPOSED TELSTRA LTE1800 RADIO-4415 (B3) (3 OFF)

- NOTES :**
- ALL FEEDERS ACCESS POINTS ON THE STRUCTURE MUST BE BIRD PROOFED AS PER EXTERNAL PLANT POLICY 003615.
  - FOR EME SIGNS NOTATED AS #2 REFER TO 005486 DOCUMENTS FOR DETAILS.
  - PROPOSED U/G TELSTRA FIBRE AND SUBMAINS CABLE TO SHARE SAME TRENCH IF POSSIBLE.

**COMPLIANCE BOX**  
 COMPLETED AS PER DESIGN   
 ALTERATIONS IN RED   
 NAME (PRINT) \_\_\_\_\_  
 SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

**UNAPPROVED DRAWING**

**AMENDED DATE: 21/04/2020**

- PROPOSED TELSTRA LTE700 GPS ANTENNA (1 OFF) TO BE INSTALLED ON PROPOSED STANDARD MOUNT.
- PROPOSED 450W NEMA 20B CABLE LADDER (APPROX. 2.1m) TO ACCOMMODATE PROPOSED TELSTRA FEEDER CABLES (9 OFF).
- PROPOSED TELSTRA SIGN TO BE ATTACHED TO MONOPOLE AT 1.5m AGL # 6

- PROPOSED TELSTRA ICS MK4.0 SHELTER (3.15m x 2.38m) TO ACCOMMODATE PROPOSED TELSTRA EQUIPMENT.
- PROPOSED TELSTRA 2.4m HIGH SECURITY FENCE (10.0m x 6.0m) WITH 3.0m WIDE DOUBLE ACCESS GATE.
- PROPOSED TELSTRA U/G FIBRE (APPROX. 30.0m) BETWEEN FIBRE PIT AT PROPERTY BOUNDARY AND TELSTRA SHELTER (INDICATIVE ONLY). REFER TO NOTE 3.
- PROPOSED TELSTRA BRANDED SIGN ON TELSTRA SHELTER DOOR
- PROPOSED TELSTRA SIGN TO BE ATTACHED TO COMPOUND ACCESS GATE # 13
- PROPOSED TELSTRA POWER DISTRIBUTION BOARD
- PROPOSED TELSTRA P5 ELECTRICAL PIT
- PROPOSED TELSTRA U/G SUBMAINS CABLE (APPROX. 180.0m) BETWEEN GROUP METER PANEL AND TELSTRA PDB (INDICATIVE ONLY). REFER TO NOTE 3.
- PROPOSED TELSTRA P6 FIBRE PIT

**SOUTH EAST ELEVATION**  
SCALE 1:100

1m 0 1m 2m 3m 4m 5m SCALE 1:100

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

ORDER	DRAWN	CHKD	AMENDMENT	EXAM	APPD	DATE	ISS
S107420.01	AA	AH	PRELIMINARY - 30060201W0338 VPL - LTE700/LTE1800/LTE2100/TE2600	BW	LD	06.02.19	1

**PRELIMINARY**



MOBILE NETWORK SITE 316974  
 CRAIGMORE NORTH  
 SOUTH EAST ELEVATION  
 286 CRAIGMORE ROAD, ULEYBURY, SA 5114

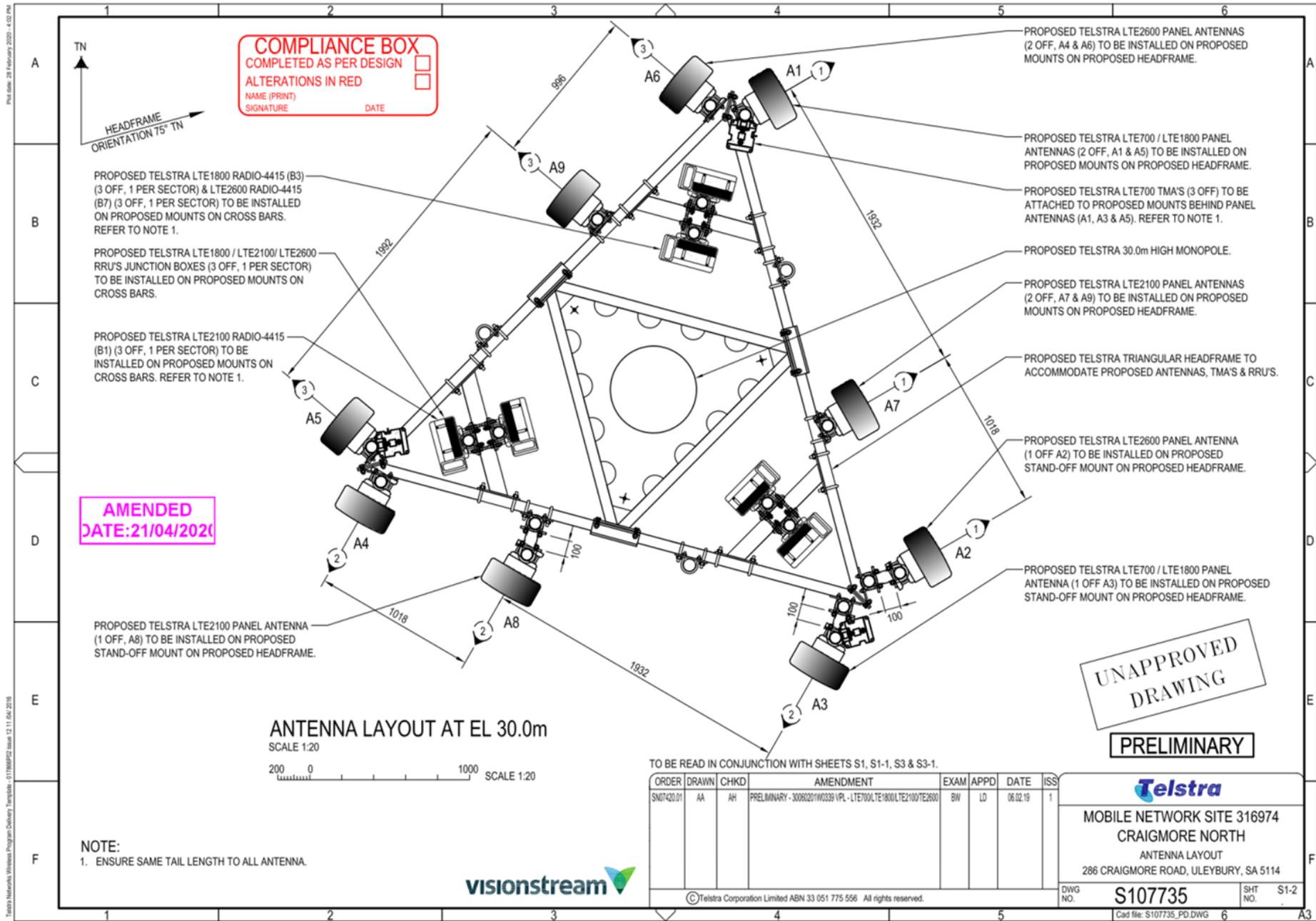


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DWG NO. **S107735** SHT NO. S3

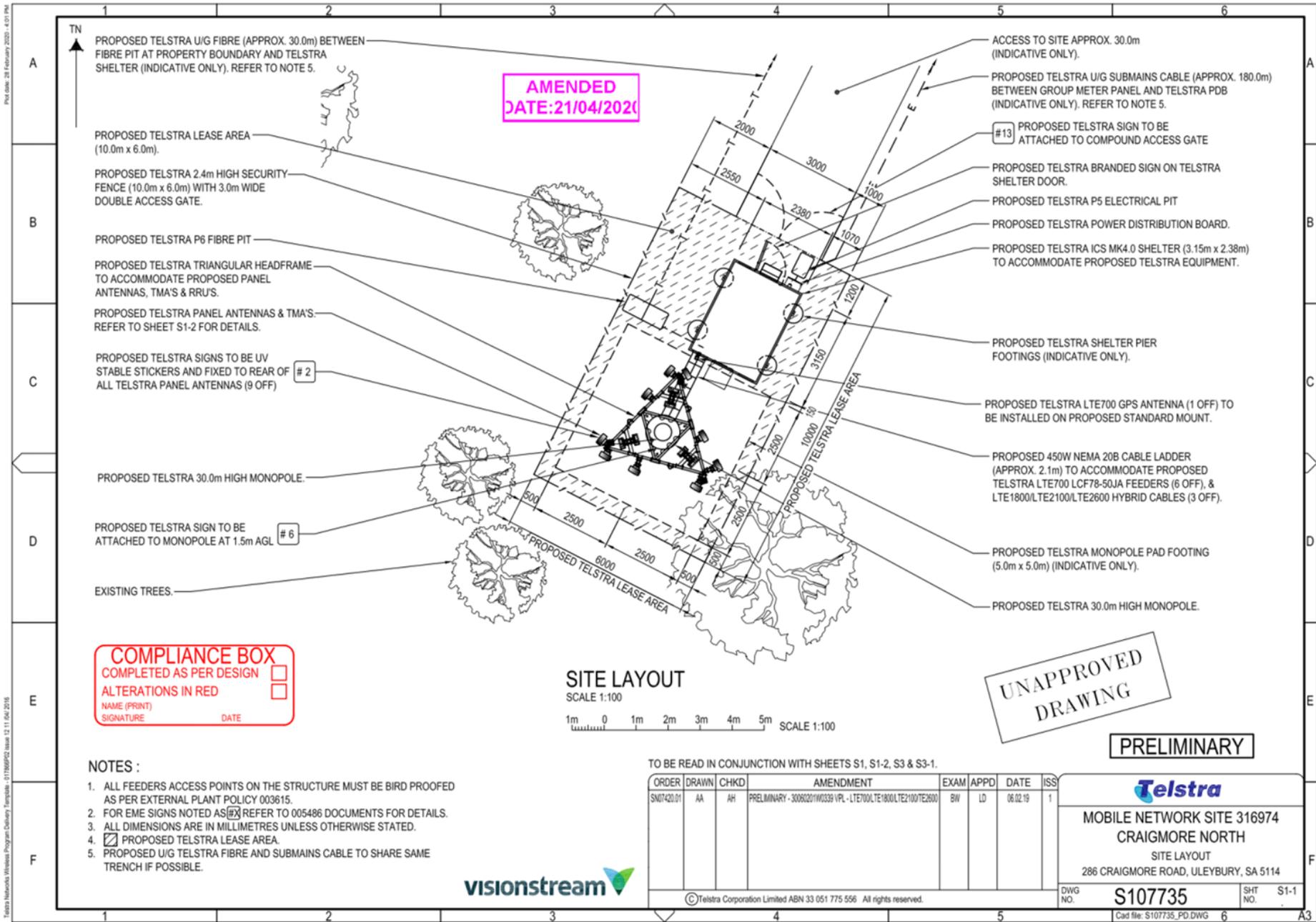
Telstra Networks Wireless Program Delivery Template - 07/08/2012 Issue 11.11.04.2018

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Telstra Networks Wireless Program Delivery Template - 011969P23 Issue 12 11 Feb 2016

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# Statement of Effect

## Development Application (Amended Report) for

The installation of a Telecommunications Facility at  
286 Craigmores Road, Uleybury, SA 5114

Document prepared by Visionstream Pty Ltd

On behalf of Telstra Corporation Ltd

Project Name: CRAIGMORE NORTH

Project No.: SN07420.01

Amendment 08/04/2020



**AMENDED**  
**DATE:21/04/2020**



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AMENDED  
DATE: 21/04/2020



## Document Control

This Development Application is prepared by:

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ABN 85 093 384 680

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Heatherton VIC 3202

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Document Control				
Rev	Date	Status	Prepared by	Reviewed by
1.0	24/03/2020	Draft	Patrick Armstrong	Clinton Northey

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**AMENDED  
DATE: 21/04/2020**



## Executive Summary

### Site and Proposal Details

<b>Address of Site</b>	286 Craigmores Road, Uleybury SA 5114
<b>Legal Property Description</b>	Lot 100 DP 92156 in the area named Uleybury, Hundred of Munno Para
<b>Local Authority</b>	City of Playford
<b>Planning Instrument</b>	Playford Council Development Plan, consolidated 27 June 2017
<b>Zone and Overlay</b>	Hills Face Zone
<b>Use</b>	Telecommunications Facility – non-complying development
<b>Owner</b>	City of Playford

### Applicant Details

<b>Applicant</b>	Telstra Corporation Limited ABN 051 775 556 C/- Visionstream Pty Ltd	
<b>Contact Person</b>	Clinton Northey	clinton.northey@visionstream.com.au
<b>Our Reference</b>	SN07420.01 CRAIGMORE NORTH	

**AMENDED**  
**DATE: 21/04/2020**



## 1 Introduction

This Statement of Effects has been prepared by Visionstream on behalf of Telstra as supporting information to a Development Application for the installation of a 30m high telecommunications facility at 286 Craigmere Road, Uleybury SA 5114. In accordance with Item (5) (a) – (e) of the *Development Regulations 2008*, the following information is hereby provided to assist Council in its assessment of this non-complying development. The proposed facility, granted it having non-complying status, is considered to have overwhelming positive effects on the surrounding locality, despite bringing a new element into the environment. The purpose of the development is to provide improved coverage for the growing needs of the established residential area of Craigmere. The proposed facility will ensure uninterrupted coverage for the present and future, which is an essential need for the community especially in regard to work, education and safety.

All mobile phone network operators are bound by the operational provisions of the federal *Telecommunications Act 1997* ("The Act") and the *Telecommunications Code of Practice 1997*. The *Telecommunications (Low-Impact Facilities) Determination 2018* allows for the upgrade of existing mobile phone network infrastructure without the consent of a relevant statutory authority.

In this instance the proposed development does not comply as a "Low Impact facility" under the definitions contained in the Commonwealth legislation. Therefore, it is subject to the provisions of the South Australian *Development Act, 1993* and the provisions of *The City of Playford Development Plan, consolidated 27 June 2017*.

## 2 Proposed Scope of Works

The proposal is inclusive of the following scope of works:

- Install one (1) 30m Monopole, with an overall height no greater than 31.4m (top of antennas);
- Installation of a triangular headframe;
- Install nine (9) new panel antennas (no greater than 2.8m in length);
- Install nine (9) Remote Radio Units (RRUs);
- Installation of one (1) Telstra Equipment Shelter, that is not more than 3m high with a base area of not more than 7.5m<sup>2</sup> at the base of the aforementioned monopole;
- Installation of associated ancillary cabling and equipment;
- Install a new 2.4m high chain-link mesh fence (dimensions 6m x 10m) surrounding the Telstra compound, with a 3m wide access gate;

**Refer to Plans attached for further details.**

## 3 Mobile Telecommunications Networks

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

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



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

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

#### 4 Site Parameters

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

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

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

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

In making the proposal for this site at 286 Craigmore Road, Uleybury, Telstra has carefully weighed all of the aforementioned criteria. This analysis is detailed in the next section.

#### 5 Development Regulations Compliance

##### Nature of the Development & nature of the locality

The Proposal, as previously mentioned, consists of a 30m Monopole, with a triangular headframe. Additionally, having an equipment shelter being 3.28m x 2.28m x 3m at the base of the pole, being surrounded by a chain link fence. The total area covered by the compound being 60m<sup>2</sup>. The locality that the facility is being proposed for is zoned as a Hills face zone. The site is with a rural residential allotment that consists of a number of existing trees. The closest residential dwelling being over 30m to the west of the proposed site. Due to the setting and large nature of the allotment and the small area being taken up by the compound area, it is Telstra’s view that the proposal does not unreasonably impact upon the locality.



### **Social, Economic and Environmental effects of the development on its Locality**

The proposed facility, granted it having non-complying status, is considered to have overwhelming positive effects on the surrounding locality, despite bringing a new element into the environment. The purpose of the development is to provide improved coverage for the growing needs of the established residential area of Craigmore. With the growing need for users of the Telstra network and the introduction of advancing technology, the proposal not only will ensure the ongoing coverage in the area but will also strengthen network access for future use. Additionally, this uninterrupted coverage for the present and future is an essential need for the community especially in regard to work, education and safety. The proposed facility introducing the ability for enhanced and uninterrupted coverage adds substantial social, economic and personal benefits to the community within the locality, such as:

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

As stated above, the Proposed Facility, despite being a non-complying development, will provide essential coverage for uninterrupted access for education and work purposes for the surrounding community. With the inclusion of additional native vegetation into the area, Telstra has ensured the appropriate assessment of all social, economic and environmental impacts of the facility on the locality.

## **6 Candidate Sites**

Telstra carefully examined a range of possible deployment options in the area before concluding that a new telecommunications facility at 286 Craigmore Road, Uleybury would be the most appropriate solution to provide necessary mobile phone coverage to the residential area of Craigmore.

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

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

### Colocation opportunities

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

Below is a map of existing and proposed telecommunications facilities surrounding the Craigmore area. The blue marker indicates the location of the proposed telecommunications facility at 286 Craigmore road, Uleybury, while the targeted coverage area is marked within the red area.

As shown below there is no facilities that are located within close proximity to the search area; The two facilities to the east being closest to the search area are Telstra and Optus facilities. The Telstra facility was discounted due to this facility being not capable of achieving the coverage requirements for the area. While the Optus facility is no longer being developed and there is no room for a new facility on the allotment.



No other existing facilities are within the required coverage area, hence there were no suitable colocation opportunities to provide the required radio frequency coverage objectives.

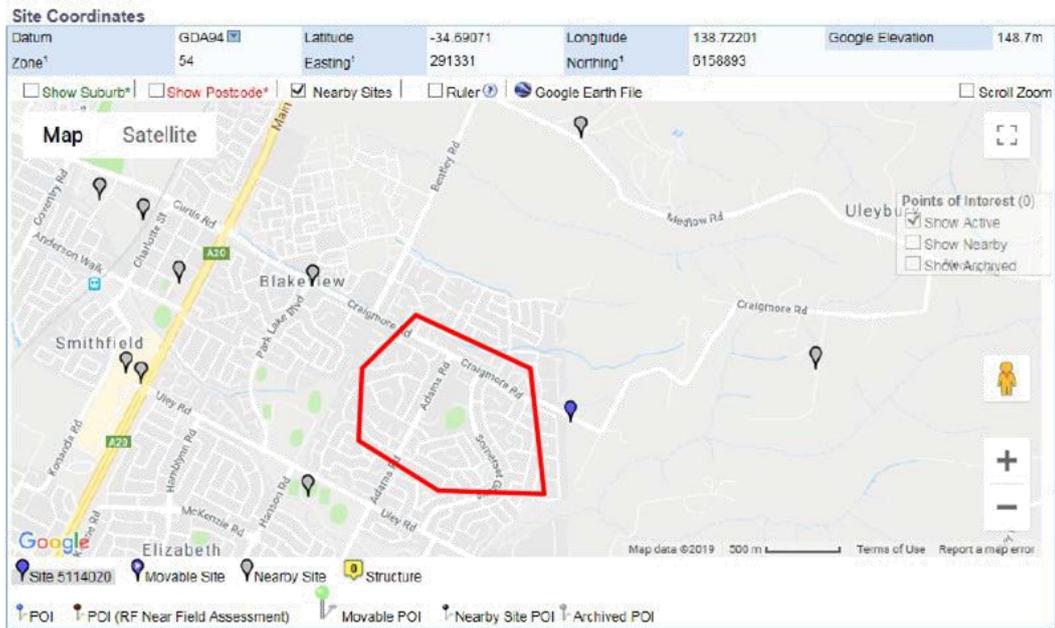


Figure 1: Location of nearby existing telecommunications facilities – Source: RFNSA, www.rfnsa.com.au

Candidates considered

Investigations into the installation of a new telecommunications facility within the Craigmore area have been ongoing to improve mobile coverage to this region.

Twelve (12) candidates were investigated. Candidates A, B, C, D, E, F and G were discounted with issues of having a willing landowner. Candidates K, L and M were discounted due to being too close to an existing Telstra facility causing interference and not meeting the coverage requirements.

Of the three remaining candidates, Candidate I, which is located across the road from the preferred candidate at Lot 2 Craigmore Road, Uleybury. The land being sloped makes design difficult and has visual impact concerns. The facility will be very visually prominent from this location and therefore was discounted on these grounds.

Candidate H is located at Lot 905 Grandview Place, Blakeview and was not selected as the preferred candidate due to the close proximity to residential dwellings and the resultant visual impact of a tall structure on surrounding residents in comparison to the preferred candidate.

Therefore, Candidate J was the preferred candidate as it is deemed to be the most optimal location to achieve the required coverage requirements and is also considered a stronger candidate from a planning merit perspective and was therefore nominated as the preferred candidate.

Candidate J is located within the Hills Face Zone and while Telecommunications Facilities are defined as non-complying development, due to the discounting of the previous candidates as well as Telstra's obligation to maintain and enhance the mobile telecommunication services, it has been decided to apply for a telecommunications facility in this location.

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Figure 2: Map of Candidates (Google Earth).



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Candidate	Location	Proposal	Description
Candidate A – (CO-LO)	SA Water Tank site & Pumping Station Cnr Craigmores Rd & Adams Rd, Craigmores 5114	Co-location/Greenfield	The Landowner has advised that there is no space on site and Optus facility will no longer be going ahead. Hence discounted on unwilling landowner.
Candidate B	<b>Council Reserve</b> - off Fleetwood Drive, Blakeview 5114	Greenfield Monopole	Council advised site is in an area for drainage and is not suitable for a tower. Hence discounted on design and unwilling owner.
Candidate C	<b>Council Reserve</b> - off Regent Grove, Blakeview 5114	Greenfield Monopole	Council advised site is in an area for drainage and is not suitable for a tower. Hence discounted on design and unwilling owner.
Candidate D	<b>Council Reserve</b> - Lot 987, Ferguson Bowl, Craigmores SA 5116	Greenfield Monopole	The council advised site will be sold and will be on the market for 18 months. Unavailable to use land.
Candidate E	<b>Council Reserve</b> - Lot 987, Ferguson Bowl, Craigmores SA 5116	Greenfield Monopole	The council advised site will be sold and will be on the market for 18 months. Unavailable to use land.
Candidate F	<b>Council Reserve</b> - Lot 1011, Craigmores Road, Craigmores SA 5116	Greenfield Monopole	The site had considerable visual impact from the location. Council unwilling to have site on this land.
Candidate G	<b>Resthaven Aged Care Facility</b> - 200-208 Adams Rd, Craigmores 5114	Greenfield Monopole	The Landowner was not interested.
Candidate H	<b>Council Reserve</b> – Lot 905 Grandview Place, Blakeview, SA 5114	Greenfield Monopole	Excessive sloping site being unsuitable site for build and ongoing maintenance. Close proximity to housing, including high visual impact. Discounted due to design for site being unachievable.



Candidate I	Lot 2 Craigmores Road, Uleybury, SA 5114	Greenfield Monopole	This candidate is within the same zone to the preferred candidate, but has a higher visual impact, additionally only position offered by landowner is on the road front. Therefore, this candidate was discounted on lack of town planning merit grounds.
Candidate J	<b>286 Craigmores Road, Uleybury, SA 5114</b>	Greenfield Monopole	<b>Preferred candidate. – Subject of Development Application</b>
Candidate K	Lot 338 California Avenue, Craigmores, SA 5114	Greenfield Monopole	This candidate's location is too close to other Telstra sites, resulting in the candidate being discounted on coverage requirements.
Candidate L	Lot 551 California Avenue, Craigmores, SA 5114	Greenfield Monopole	This candidate's location is too close to other Telstra sites, resulting in the candidate being discounted on coverage requirements.
Candidate M	Lot 339 California Avenue, Craigmores, SA 5114	Greenfield Monopole	This candidate's location is too close to other Telstra sites. Hence, resulting in the candidate being discounted on coverage requirements.

**Figure 3: Details of Alternative Candidates.**

### 6.1 Nominated Candidate

A preferred nominated candidate was selected for the proposed facility based on the radiofrequency objectives, planning and environmental issues, potential community sensitive uses and engineering criteria, as noted above. In this case, **Candidate J** (a new 30m Monopole located at 286 Craigmores Road, Uleybury) was considered the best option. This was based on the following:

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

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



The proposed Telstra site has been located and designed to minimise impact on the amenity of the surrounding area. The site has been located within a rural-residential property. The allotment is very well vegetated, creating a strong screening for the facility on the property. The allotment sits outside of the residential area of Craigmores, which is the targeted area for the facility, being situated approx. 90 meters to the east of the residential zone.

### 6.2 The Site and Surrounding Area

The subject site is located at 286 Craigmores Road, Uleybury. The legal description of the property is Allotment 100 Deposited Plan 92156 in the area named ULEYBURY Hundred of Munno Para (CT Volume 6128 Folio 566). A copy of the Certificate of Title has been attached for information purposes.

The land is owned by Frank and Antonella Lombardo.

The aforementioned land is zoned 'Hills Face' under the provisions of the Playford Council Development Plan, consolidated 27 June 2017 – refer to **Section 6** for additional information on Development Plan and map images.

The site is currently used as a rural residential property. The site will be accessed off Craigmores Road. The surrounding land is characterised by residential, rural residential and agricultural land uses.

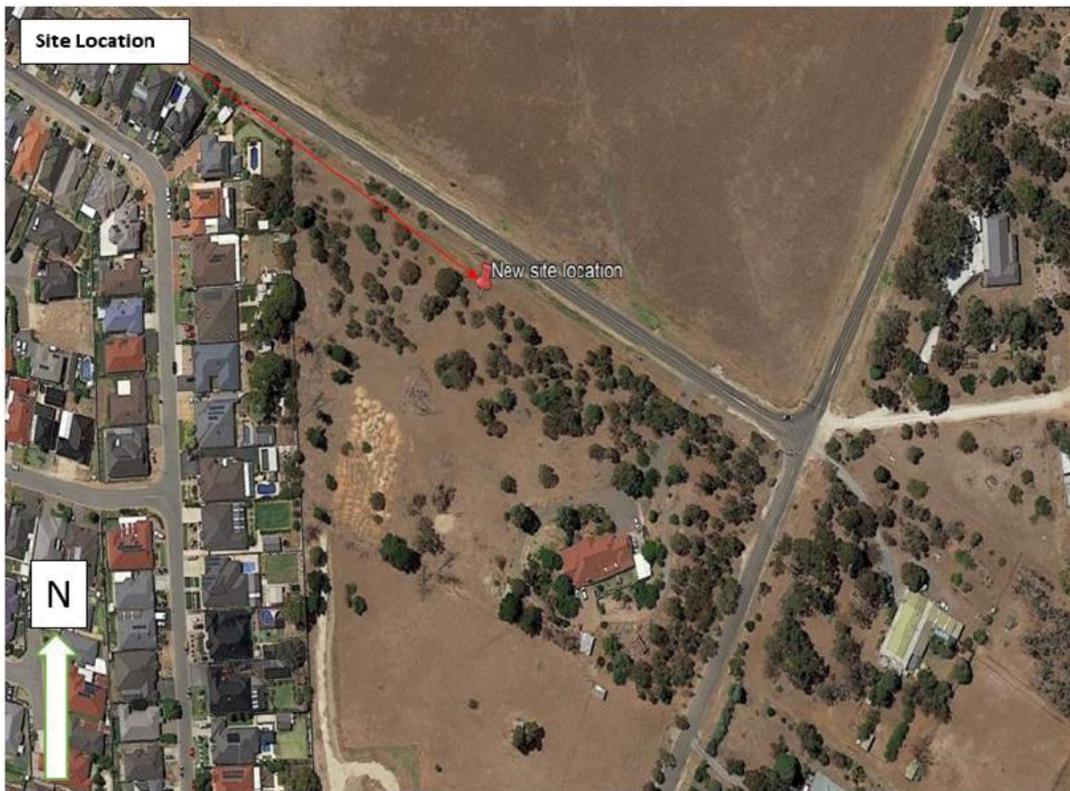


Figure 4: Proposed Telstra Site – 286 Craigmores Road, Uleybury (Source: Google Earth)

The subject Lot is 5.073 hectares in size, maintaining a frontage to Craigmores road. The land is a large allotment with a range of trees varying in height throughout, with the proposed site location being setback some 18m from both Craigmores Road in an open portion of the well vegetated reserve, at a high point in the land.

The proposed telecommunications facility is set well within the allotment to ensure there is enough space to avoid removing vegetation, while still utilising the natural screening and staying adjacent to the target



coverage area. The established landscaped locality comprising large (up to 15m in height) trees and power lines running along Craigmores road.

Appropriate setbacks to any identified 'Sensitive Sites' have been considered and achieved during the detailed siting of the facility. The closest residential property is approximately 80m west of the site location.

The site is not located in an area of environmental significance as defined by The *Telecommunications (Low-Impact Facilities) Determination 2018*.

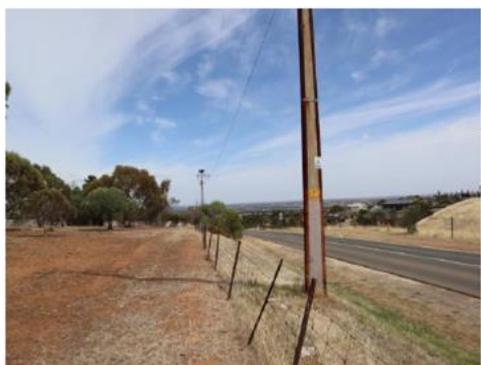
### 6.3 Photos of Site and Locality



View from site location looking north.



View from site looking South



View from the site access looking west towards nearest residences.



View from site looking east along Craigmores Road.



Figure 5: Indicative view of proposed monopole from Craigmore Road, approx. 320m west from the proposed site.

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**Figure 6: Indicative view of proposed monopole from corner of Birmingham Drive and Manchester Circuit, approx. 170m South-West from the proposed site.**

## 7 The Development Plan

The Playford Council Development Plan consolidated 27 July 2017 provides the planning basis for the Playford Council Local Government Area.

The proposed site is zoned *'Hills Face'* and surrounding areas are zoned Residential as shown in **Figure 7** below.

It has been determined that a Telecommunications Facility is a 'non-complying' form of development within the Hills Face Zone. The general intent of this zone is to provide natural backdrop to the Adelaide plain, and to ensure to preserve and restore indigenous vegetation.

The Desired Character Statement envisages the enhancing the natural character of the native landscape, using vegetation and colours such as green, brown and non-reflective tones. The development will occupy only a small portion of the Hills Face zone.

The detailed siting does not restrict the established use of the land or neighbouring land to attain the zone objectives.



Consideration of the development and potential visual impact is acknowledged as an important factor when considering the design and siting of a new facility and is discussed in detail below.



Figure 7: Zoning Map (Government of South Australia)

### 7.1 Relevant Assessment Provisions

#### Hills Face Zone

It is acknowledged that the development will have elements of visual impacts within this zone, adding to the fact it is not envisaged development within the Hills face zone, being non-complying, as stated in PDC 2. However, the proposed location of the facility has been chosen due to a number of reasons to minimise any impacts to the zone, locality and residents. The site is located as far away from residents as possible, while still meeting the coverage needs of the area. In terms, of screening the facility, the existing vegetation that existing on the allotment surrounds the proposed site protecting the view of the equipment shelter and bottom of the tower. The proposed site has vegetation that incorporates existing screening to comply with PDC 3(a). Although being, a non-complying development, the proposed facility is required infrastructure that meets the needs of the community in the Hill Face zones.

The facility will not have any impact on desired uses in the present or the future within the Hills Face zone. The facility will also remain unpainted as the natural colouring.

#### Telecommunications Facilities

The purpose of the proposed Telstra telecommunications facility aims to provide new technology to improve the existing coverage for the present and the exponentially increasing needs for the future. The site ensures to balance this need to bring coverage to the community, whilst minimising the visual impact as much as possible, especially due to being within the Hills Face zone and close to the Residential zone to the west. This has been achieved through utilising the existing vegetation within the proposed site. Due to this the proposal is considered to be compliant with Objectives 1 and 2, and PDC 1(a), (b), (f), 3(a) and 4.



## 8 Planning Assessment

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

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

### 8.1 Community and Facility Need

The purpose of the development is to provide improved coverage and data coverage within the established residential area of Craigmore as well as providing enhanced in-building coverage to these homes. The coverage zone being targeted particularly at the residential area surrounded by Craigmore and Adams Road. There is a need to improve the mobile telecommunications services within the designated area to meet the increasingly growing demands of new mobile service users as well as the need for future users of the expanding urban area. A new site is required to improve Telstra mobiles services and enhance capacity to meet growing demand in the target area around Craigmore. The required objective cannot be achieved using only the existing surrounding sites due to terrain limitations and network constraints.

The proposed site location was chosen because it has good proximity and is able to fully cover the target area. This is an important consideration for location selection as the mobiles site can only provide service to the area immediately surrounding.

The proposed height of the new Telstra site is 30m in height. Sufficient height is required to overcome limitations imposed by surrounding terrain. Reduction from the proposed height will result in corresponding reduction of the area that is serviceable by the new site.

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



## 8.2 Minimisation of Visual Amenity Impact

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

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

In this instance, there are no existing co-location opportunities that will achieve the need of the facility. The Optus telecommunications facility near the search area will no longer be being built, as the site can no longer accommodate the space for a telecommunications facility. No other sites within the area, where able to achieve the coverage requirements of the proposal. This is explained in detail above in **Section 5**. Accordingly, a greenfield facility is considered the only feasible means of achieving the coverage objectives noted within this report.

Of the six (6) other potentially viable candidates (D, E, F, H, I & J) Candidate J (The Preferred Candidate) is best in terms of minimising the potential visual impact within the locality (balance of Candidates discounted for not having an achievable design, poor visual impact minimisation or failing RF coverage objections as detailed in **Section 5**).

The development is sited at the 286 Craigmores Road, Uleybury, placing the facility within a rural/residential area (Hills face zone adjacent to Residential), being located near housing and open rural allotments. The subject site is located on the western side of the allotment and is approximately 80 metres from the western boundary and 12 metres from the northern Craigmores road boundary. Candidate I is well visible from the established residential area surrounding and has no existing measures of visual impact minimisation (being required to be placed close to the road boundary). While Candidate H, also having the same visual issues as candidate I, due to the slope of the land of allotment, the construction and on-going maintenance creates many design issues. Three candidates (D, E & F) were discounted due to the design being unachievable, large vegetation removal required and within the middle of the residential zone creating high visual impact.

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

Notwithstanding, Telstra makes every effort to design base station infrastructure that is visually unobtrusive; in this regard, Telstra is proposing to install a 30m monopole which has been sited to maintain the primary use of the land whilst considering the visual impact to the surrounding area. The site carefully considered environmental and visual constraints, existing and future land use characteristics, the orderly planning of the area and the design of the facility. On balance, it is considered that the location and height of the facility ensures optimal service provision to the area whilst minimizing any perceived visual impact.

The monopole in this instance was seen as the preferred structure type due to the overall height required for the facility as well as being the most slimline structure available. The structure will remain unpainted which has been proven to effectively blend in with the sky backdrop.

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



Accordingly, the proposal is considered to be consistent with the relevant Council Wide Telecommunications Facilities Objective 2, PDC 1 (b), (c), (g) and PDC 3(a) together with the Hills Face Zone PDC 23 & 26.

### 8.3 EME and Health

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

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

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

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

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

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

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

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

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

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



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

#### 8.4 Access

Access to the proposed site will be via a new vehicle crossover from Craigmores road. This will be situated north from the facility, to ensure easy access to the facility without the removal of vegetation. (Refer Proposal Plans (S1) for more information)

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

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

#### 8.5 Utilities

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

#### 8.6 Construction

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

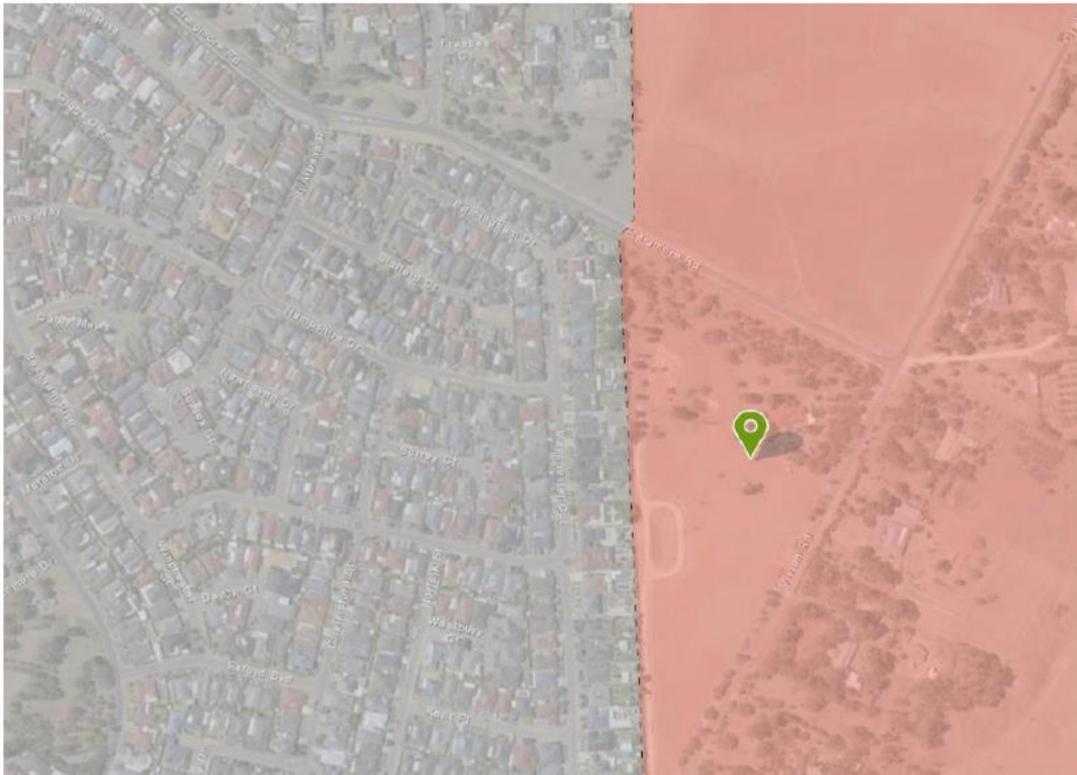
Noise and vibration emissions associated with the Telstra Mobile Base Station Facility will be limited to the construction phase. Noise generated during the construction phase will be of short duration and will be in accordance with the standards outlined in the *Environmental Protection (Noise) Regulations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

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

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

#### 8.7 Bushfire

The specific site location is identified as a high Bushfire Protection Area (See **Figure 9**).



**Figure 9 – Bushfire Prone Areas Mapping (Government of South Australia)**

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

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

With the area being classified as high bushfire risk, Visionstream, on behalf of Telstra, ensures that all necessary design measures have been undertaken to ensure the facility does not increase or affect the bushfire risk to the area.

### 8.8 Flora and Fauna

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

Searches identified the potential of 18 threatened and 13 migratory species of Flora and Fauna significance located in the vicinity of the proposed site.

The development does not necessitate the removal of any substantial vegetation.

The site is also not located in an area of environmental significance as defined by The *Telecommunications (Low-Impact Facilities) Determination 2018*.



## 9 Conclusion

This application seeks to facilitate the development of telecommunications infrastructure within the Craigmore area, comprising rural residential, residential and agriculture uses by seeking planning consent of a new Telstra 30m monopole as well as the installation of antennas and ancillary equipment.

Following an extensive site selection process, the facility has been strategically sited and designed to balance the need for the facility and minimise potential visual impact within broader environment as much as practicable. The initial siting of the facility was set back from residential properties to the west at a distance of 30metres (approximately), however to allow for an increased setback as well as a further reduction in siting, the proposed facility has been moved further to the east of the land at a distance of 80metres.

In this regard, Telstra considers that the proposal satisfies the requirements of the Development Plan, whilst also addressing coverage deficiencies within the local area.

In summary, the proposal is considered to not be seriously at variance to the relevant policies in the Development Plan and worthy of consent for the following reasons:

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

On balance, the proposed development is generally consistent with all relevant policies in the Playford Council Development Plan and warrants the granting of Development Plan Consent and concurrence of the Development Assessment Commission.



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### Proposed 30m Monopole Installation - Craigmore North

Indicative view from Craigmore Road, approximately 320m west from the proposed site.



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DATE:21/04/2020

### Proposed 30m Monopole Installation - Craigmore North

Indicative view from corner of Birmingham Drive and Manchester Circuit, approximately 170m south-west from the proposed site.

# Environmental EME Report

<b>Location</b>	286 Craigmores Road, ULEYBURY SA 5114		
<b>Date</b>	18/01/2019	<b>RFNSA No.</b>	5114020

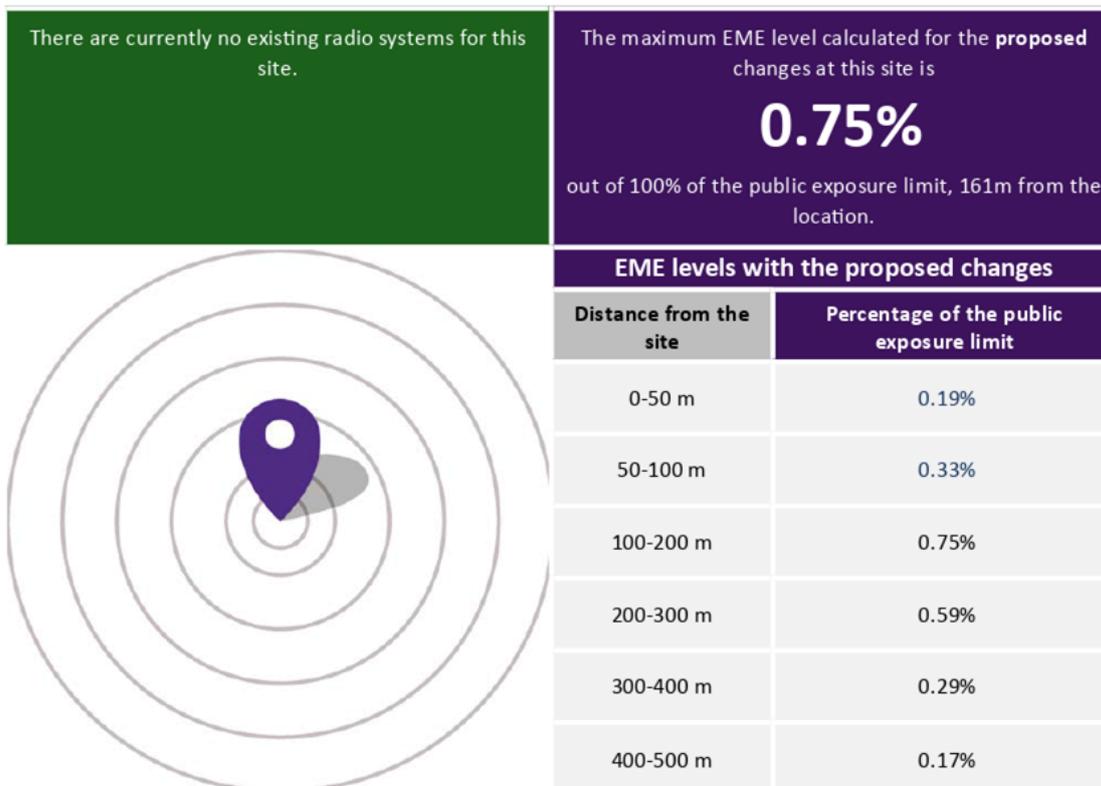
## How does this report work?

This report provides a summary of levels of radiofrequency (RF) electromagnetic energy (EME) around the wireless base station at 286 Craigmores Road, ULEYBURY SA 5114. These levels have been calculated by Telstra using methodology developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).

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

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

## A snapshot of calculated EME levels at this site



For additional information please refer to the EME ARPANSA Report annexure for this site which can be found at <http://www.rfnsa.com.au/5114020>.

## Radio systems at the site

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

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

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

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

Distance from the site	Existing configuration			Proposed configuration		
	Electric field (V/m)	Power density (mW/m <sup>2</sup> )	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m <sup>2</sup> )	Percentage of the public exposure limit
0-50m				2.22	13.058	0.19%
50-100m				2.24	13.34	0.33%
100-200m				4.51	53.89	0.75%
200-300m				4.23	47.47	0.59%
300-400m				2.9	22.26	0.29%
400-500m				2.2	12.89	0.17%

## Calculated EME levels at other areas of interest

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

### Maximum cumulative EME level for the proposed configuration

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

## PROPOSED TELSTRA MOBILE TELECOMMUNICATIONS BASE STATION AT 286 CRAIGMORE ROAD, ULEYBURY SA 5114



Figure 1: (Map Description)

### What is the proposal for Uleybury?

Telstra is writing to inform you about an important improvement to our mobile telecommunications service with the proposed installation of a mobile telecommunications base station at 286 Craigmore Road, Uleybury SA 5114 (Proposed Facility).

The Proposed Facility will comprise the following:

- 30m high Monopole with a headframe;
- Six (6) panel antennas (to be attached to the headframe);
- Nine (9) Remote Radio Units (RRUs);
- 3 TMS's
- An (equipment shelter) located at the base of

*This Proposal will require a Development Application to be submitted to the Playford Council in accordance with the Playford development plan and will undergo the public consultation process in accordance with the South Australian Development Regulations 2008 under the Development Act, 1993.*

The location of the Proposed Facility is consistent with the relevant provisions of the Playford Development plan and is considered to be appropriate for the following reasons:

- It will provide new and improved Telstra mobile services in the Craigmore and Uleybury areas to our existing base stations.
- The site is set within private property.



viewed from the surrounding street network and will reduce the potential visual impact;

- The subject site is zoned 'Hills Face Zone' and as such the Proposed Facility is considered to be consistent with the subject lot and surrounding land uses.

#### Why does Telstra need a new facility at Uleybury?

Telstra constantly monitors our network for usage and performance. The Proposed Facility is an important part of Telstra's infrastructure upgrade program in the Adelaide Metro which includes both adding capacity to the existing sites which serve the area and introducing new sites.

A new facility in Uleybury, will provide added capacity to the network to improve and maintain local mobile network services (including voice calling and SMS), as well as video calling, video-based content services (like news, finance and sports highlights) and internet browsing.

It will also cater for the increasing demand being placed on our network by our customers, ensuring they enjoy the same experience as they do today.

Telstra understands that some locations where we need to place our facilities are more sensitive than others. Telstra works diligently to find a balance between providing high quality services and minimising our impact on the community and the local environment. In addition to technical requirements, Telstra has taken into account a number of other important non-technical criteria when

selecting a site, including:

- the potential to co-locate at an existing telecommunications facility;
- the potential to locate on an existing building or structure;
- the visual impact on the surrounding area and the need to obtain relevant town planning approvals;
- the proximity to community-sensitive locations and areas of environmental heritage or significance; and
- the type of and ability to secure tenure at the site.

#### How do Mobile Phone Networks Work?

A mobile communications network is made up of a patchwork of cells covering a geographic area. When you make a call or try to download content, your device will pick up low-power radio signals, usually from the nearest base and then send and receive data. As you move outside of that cell, the phone will "talk" to adjoining cells from different facilities.

Telstra's network is made up of many low-powered facilities located on rooftops of commercial buildings, apartments, hospitals, sports complexes and on existing infrastructure such as light poles and telecommunications towers that are positioned throughout the community to provide reliable, continuous network coverage for both local customers and those travelling through the area.

There are many factors that may cause a call drop-out or slow data speeds while you are transferring content. First, you may be too far away from a facility to pick up a signal, or there may be objects blocking the signal from your nearest facility – such as hills, large buildings or even trees. Second, the facility may be handling as many calls as it can manage – cell drop-outs and slower data speeds can occur when too many customers are using the available resources of a facility at once. Third, the depth of coverage (which affects the ability to make calls inside buildings) may be insufficient.





Figure 2: Example photomontage of the proposal from Craigmore Road (looking east)

**Base Stations and Health**

Telstra understands that some people have genuine concerns about the levels of Electromagnetic Fields (EMF) that the Proposed Facility will emit and is committed to addressing those concerns responsibly. EMF is sometimes known as electromagnetic radiation (EMR) or electromagnetic energy (EME). Electromagnetic fields are present everywhere in our environment – the earth, sun and ionosphere are all natural sources of EMF.

We rely on the expert advice of international and national health authorities including the World Health Organization (WHO) and the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) for overall assessments of health and safety impacts.

The International Commission on Non-Ionizing Radiation Protection (ICNIRP) has issued guidelines on levels of allowable public exposure to Radio Frequency (RF) fields, including guidelines on RF from mobile phones and base stations that Telstra complies with. These guidelines have a

large safety margin built into them.

In addition, further information is available at: [www.telstra.com.au/eme](http://www.telstra.com.au/eme) and EMF Explained Series [www.emfexplained.info](http://www.emfexplained.info)

**Does the Proposed Facility meet the ARPANSA safety limit?**

It is Telstra's responsibility to comply with the mandated standard (RPS3) for EMF set by ARPANSA, which is based on the safety guidelines recommended by the WHO. The safety standard works by limiting the network signal to a level low enough to protect all people, in all environments, 24 hours a day. The safety limit itself has a significant safety margin built into it.

To demonstrate compliance with the safety standard, an Environmental EME Report is available via the RFNSA website:

[www.rfnsa.com.au/5114020](http://www.rfnsa.com.au/5114020)

This report predicts that the maximum signal strength from the Proposed Facility at 1.5m above ground level, is well within the allowable limit that it is permitted to transmit over a 24 hour period. This is typical of Telstra's responsible approach to network performance and environmental compliance. \*



*"Health authorities, including ARPANSA and the WHO have examined the scientific evidence regarding possible health effects from base stations. Current research indicates that there are no established health effects from the low exposure to the RF EME exposure from mobile phone base station antennas."*

ARPANSA Fact sheet "Mobile Base Stations and Health" March 2015

**Further information about EMF**

Commonwealth Department of Health (ARPANSA) [www.arpansa.gov.au](http://www.arpansa.gov.au)

Australian Communications and Media Authority (ACMA) [www.acma.gov.au](http://www.acma.gov.au)

World Health Organisation (WHO) [www.who.int/en/](http://www.who.int/en/)

**Consultation and Having Your Say**

Telstra has lodged a Development Application with Playford Council for the Proposed Facility.

The DA number is 292/1594/2019

The proposal is a category 3 form of development and the Playford Council will be responsible for the necessary public notification. Telstra understands this notification will occur over the period 2<sup>nd</sup> December 2019 until 13<sup>th</sup> December 2019.

Enquiries on how to lodge a representation about the proposal should be directed to Council on (08) 8256 0333 .

**Contacts**

Any questions in relation to the Proposed Facility can be directed in writing to Clinton Northey at the address below or via email to [clinton.northey@visionstream.com.au](mailto:clinton.northey@visionstream.com.au)

20 Corporation Drive, Heatherton Vic 3202

Your comments will be forwarded to Playford Council. You will also have the opportunity to provide feedback directly to the Council as part of the development approval process.



4 | Version 2 29 March 2019

DEVELOPMENT ACT, 1993

**STATEMENT OF REPRESENTATION**

Pursuant to Section 38 of the Development Act, 1993

Development Application No: **292/1594/2019**

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

MRS. SANDRA SCHWERDT

Name of Person(s) making representation: MR. ANDREW ODIEREJKO

Postal address: 18 MANCHESTER CIRCUIT CRAIGMORE

Contact telephone No. 0425353772

Nature of Interest / Affected by Development OWNER OF LAND IN VICINITY.  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Reasons for representation (please attach  
additional sheet(s) if required)

AS PER ATTACHED DOCUMENT

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

AS PER ATTACHED DOCUMENT

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: ANDREW ODZIEREJKO

Signed: *A. Odziejko*

Date: 8/12/19

To the CEO of City Of Playford Council.

I am writing to you today to voice my concerns about the Category 3 development application 292/1594/2019, construction of a telecommunications facility at 286 Craigmore Road Uleybury. As my understanding is, the area is still zoned as a Hills-face zone. This is one of the reasons for purchasing the land and establishing a home there for the outlook from the backyard and surrounding area of farmland and the natural outlook of the area. This view will be compromised and the natural look of the land will be changed with a massive 31.4 metre tower to be constructed towering over current vegetation and trees currently establishing the area. As the owners realised due to this zoning restriction council did not permit the building of a structure over 1 meter high in the area due to a nature set-back so land owners were forced to build sheds and other structures 10 metres off the fence line due to the hills face zoning. But now council seeks residential approval for a similar issue regarding a 31 meter tower in the same area by a billion \$\$\$ company. If this approval is accepted then what next? Subdivision of the hills face area? More mobile towers when OPTUS or another Telecommunications company wants to expand their 5G network. I do not have an issue with the technology just with it in such close proximity to housing in the area for various reasons.

The distance of 28 metres to the closest neighbouring buildings fence lines is not an adequate distance away for many reasons as I will discuss further. This Telecommunications tower will not only impede views from homes in the area but will also de-value property prices of homes directly affected by the towers close proximity to adjacent and near-by properties. There is a stigma around 5G Telecommunication towers causing serious health risks from the Radio Frequency Radiation it produces on a 24 hr/ 7 days a week, 365 day a year timeframe. These levels of radiation from the higher frequency milli-wave forms produced by the 5G towers maybe classed as acceptable in low doses ( ie. Walking past it won't kill you) but under the conditions it's designed for and the location that's proposed is highly disputed as being a possible carcinogenic causing serious health concerns.

Many studies have associated low-level Radio Frequency Radiation exposure with a litany of health effects, including:

- DNA single and double-strand breaks (which leads to cancer)
- oxidative damage (which leads to tissue deterioration and premature ageing)
- disruption of cell metabolism
- increased blood-brain barrier permeability
- melatonin reduction (leading to insomnia and increasing cancer risks)
- disruption of brain glucose metabolism
- generation of stress proteins (leading to myriad diseases)

As mentioned, the new 5G technology utilizes higher-frequency MMW bands, which give off the same dose of radiation as airport scanners. The effects of this radiation on public health

have yet to undergo the rigours of long-term testing. Adoption of 5G will mean more signals carrying more energy through the high-frequency spectrum, with more transmitters located closer to people's homes and workplaces—basically a lot more (and more potent) RFR flying around us. Remember when cigarette smoking was deemed healthy ??? When asbestos was used without the public knowing full well of its deadly properties ??? It took time for these deadly findings to be publicly released even though the manufacturers already knew what diseases could be caused by their products.

I plan to live in this area for probably most of my remaining years which I hope is a good 25+ years without the threat of one day waking up to news of health conditions caused by long term exposure to RFR. I'm sure there are more adequate areas further up the hill and around the corner of Craigmore Road that would suit this development better for all concerned.

So I ask council one simple question would you want a telecommunications tower in your backyard ???

Regards,

Andrew Odzierejko.

DEVELOPMENT ACT, 1993

**STATEMENT OF REPRESENTATION**

Pursuant to Section 38 of the Development Act, 1993

Development Application No: **292/1594/2019**

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation: Tanya Randall

Postal address: 26 Birmingham Drive  
Craigmore SA 5114

Contact telephone No. 0402787979

Nature of Interest / Affected by Development (eg adjoining resident, owner of land in vicinity, or on behalf of an organisation or company) Property Devalue.

Reasons for representation (please attach additional sheet(s) if required) Property Devalue.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I support the proposal  I do not support the proposal

My representation would be overcome by: \_\_\_\_\_  
(state action sought) (please attach additional sheet(s) if required)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed:



Date:

06/12/2019

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

Stephen & Pauline Hart

Postal address:

41 Birmingham Drive (Bigmore) 5114

Contact telephone No.

0409285820 (Steve)

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Owner & adjoining land

Reasons for representation (please attach  
additional sheet(s) if required)

Please refer to additional attachments.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

None - we do not want the  
application approved.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

[Signature] [Signature]

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: Stephen Hart

Signed:



Date: 11/12/20

In reference to the development application No 292/1594/2019

Proposed Telecommunications 30m Phone Tower

In reference to the proposed development application number 292/1594/2019 for planning consent for a phone tower to be erected at 286 Craigmores Road, Uleybury.

We wish to oppose this structure being built on the following grounds:

- 1 This is a hills face zone and so cannot be built on. All the houses along Birmingham Drive have a 10m exclusion zone at the back of their blocks and we cannot build in this zone, therefore it would be reasonable to expect that neither can anyone else.
- 2 The photos in the document show a super imposed phone tower offering a softened look by taking the pictures a distance away from the homes, so that it appears as less of an impact on the surrounding homes. We refer you to photo's attached of a front view of my own property and rear garden view. In addition the last photo is one taken at Craigmores shops which we are standing approximately the same distance from our rear boundary. As you can see the visual impact is a lot more considerable if the phone tower were to go ahead.
- 3 Health impacts - Phone towers have not been around long enough to get a true indication on any long term health risks by living so close to a tower. A reasonable example of this would be the use of asbestos many years ago in the building industry, where it was deemed to be no health risks, but as time went on it become one of the worst health disasters we have seen.
- 4 Property values - Speaking to a real estate agent, it would be fair to say that our property could devalue by between \$10,000 and \$30,000 by having this tower overlooking our property.
- 5 Should this tower be erected, there is no guarantee that Telstra would not add further antenna infrastructures.
- 6 I would like our elected councillors to put themselves in our shoes and consider what their view of this tower going ahead would be.

I refer you to the photos in this document as to what the true visual impact would be on not only my property but all the other ones in close proximity.











DEVELOPMENT ACT, 1993



STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019



To: Chief Executive Officer
City of Playford
12 Bishopstone Road
DAVOREN PARK SA 5113

Name of Person(s) making representation:

G. SCOTT
34 BIRMINGHAM DRIVE
CRAIGMORE

Postal address:

Contact telephone No.

0417851540

Nature of Interest / Affected by Development
(eg adjoining resident, owner of land in vicinity,
or on behalf of an organisation or company)

OWNER OF LAND IN VICINITY

Reasons for representation (please attach
additional sheet(s) if required)

LARGE TOWER OPPOSITE HOME

I support the proposal [ ]

I do not support the proposal [x]

My representation would be overcome by:
(state action sought) (please attach additional
sheet(s) if required)

MOVE AWAY FROM HOMES IN AREA

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: MR S. HART

Signed:



Date: 2-12-19



28 Birmingham Drive  
CRAIGMORE SA 5114  
4 December 2019  
Phone: 82142017  
Mobile: 041 787 1275

The Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Dear Sir/Madam

RE: PUBLIC NOTIFICATION OF CATEGORY 3 DEVELOPMENT  
Construction of a telecommunications facility and associated fencing at 286  
Craigmore Road, ULEYBURY SA 2114

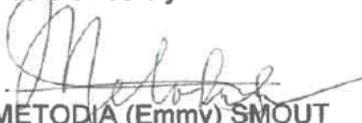
Thank you for your letter detailing the proposed development at the site mentioned above.

I hereby express my heartfelt feedback and vehemently wish to be heard by Council in respect to said submission due to the following reasons:

- 1) I believe that it would devalue my property as the general population would not like to face the big tower close to my property. It is a joint discussion in our neighbourhood that it would devalue our properties.
- 2) I have been informed by several professional people that a facility similar to the development as described would affect the brains of the people residing in the area.
- 3) It is considered an eyesore to our well-loved and expensive residential area. I personally identify this telecommunications facility will ruin the beauty of the landscape that we are very proud of.

Thank you very much for considering my views and feeling to the matter and in anticipation for a favourable outcome.

Yours sincerely

  
METHODIA (Emmy) SMOUT  
Resident



DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer
City of Playford
12 Bishopstone Road
DAVOREN PARK SA 5113

Name of Person(s) making representation:

DENIS + ROSEMARY O'BRIEN

Postal address:

37 BIRMINGHAM DRIVE

CRAIGMORE SA 5114

Contact telephone No.

0413021140

Nature of Interest / Affected by Development
(eg adjoining resident, owner of land in vicinity,
or on behalf of an organisation or company)

ADJOINING RESIDENT.

Reasons for representation (please attach
additional sheet(s) if required)

OBJECTION TO VISIONSTREAM

DEVELOPMENT PROPOSAL FOR TELECOMMUNICATION TOWER

SEE ATTACHED.

I support the proposal [ ]

I do not support the proposal [X]

My representation would be overcome by:
(state action sought) (please attach additional
sheet(s) if required)

RELOCATION OF TOWER

TO NON RESIDENT LOCATION

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

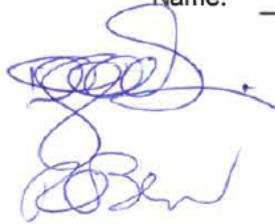
(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed:



Date:

11/12/19

Visionstream Development Application submission- Proposed 30 metre Telecommunication facility at 286 Craigmere Road, Uleybury SA 5114.

**Objections and questions regarding proposed facility.**

We were advised at time of purchasing our land that area where development is proposed was described as "Hills Face Zone" and no further buildings or constructions would take place on this land. This was a very important part of our decision to purchase our property. We have a 10 metre easement on our property restricting us from building any permanent structures on the rear of our land adjacent to proposed development site. It seems unfair that the current proposal should be allowed to proceed in this zone.

In documentation received by us it mentions often that development is a "non-complying development" which tells us that it is not a normal structure allowed in Council area and therefore will have a substantial impact on environment and visual landscape especially from our adjacent property.

In documentation received by us developer concedes that it is not an ideal position because of impact on environment and visual positioning but it does suit Telstra needs. (page 15 & 16)

Monopole is to be 31.4 metres high with attached antennas and will not be obscured by existing vegetation as suggested (page 11) from our property. At least the top 15 metres will be totally visible. Existing suggested vegetation mentioned is currently dying or dead.

We consider that due to this visual impact from our property that we will have considerable devaluation of our properties value as a result.

We have spent nearly \$80k landscaping our property to a very high standard and consider that this construction WILL devalue our property. Land agents have been consulted and it has been advised that there will be an impact on the resale value of our property. Will we be given any compensation as a result?

Document mentions that structure is 30 metres from dwellings yet maps show 28 metres. Substantially closer given proximity to houses.

Photos provided to support low impact on visual appearance do not appear accurate. (pg. 13 figure 5) and do not show impact from our dwelling. Structure will be very visible from many kilometres.

Document page 21 "Conclusion" paragraph f. suggests that proposal will be available for future co-location. Does this mean that tower will be added to with possible 5G facilities? What impact will this have on any services that we have in our residence e.g. internet, mobile phone reception etc.? Are there any health concerns if this should occur?

Page 18 suggest that there will be some low- level noise from the ongoing operation of air conditioning equipment. It is mentioned that this constant noise related impact will be negligible. We do not want this to impact on our noise level inside our house given the close proximity of our property.

We do not want any fauna especially birds to be deterred from our area as we have developed our property to encourage them.

We are totally against this development and consider it will be a blight on the visual aspect from our property and surrounding landscape and request that Playford Council reject this application.



DEVELOPMENT ACT, 1993

**STATEMENT OF REPRESENTATION**  
Pursuant to Section 38 of the Development Act, 1993

Development Application No: **292/1594/2019**

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

Mark & June Holland

Postal address:

39, Birmingham Drive  
Craigmore 5114

Contact telephone No.

0401 275 261

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

OWNER OF HOUSE / LAND IN  
VICINITY

Reasons for representation (please attach  
additional sheet(s) if required)

AS PER ATTACHED  
LETTER

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

AS PER ATTACHED  
LETTER

ALSO

\* facebook petition STOP the Telstra Tower!

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: Mark Holland

Signed: M Holland

Date: 9-12-19

To the CEO of Playford City Council

I am writing to voice my concerns about the category 3 development application 292/1594/2019 to construct a telecommunication tower at 286 Craigmere Road, Uleybury.

When we purchased our property we were strongly told that there would be no future development behind us as it is a hills faced zone. The proposed tower is 20 meters from my back fence which is an eye sore to an area that has nature, trees, birds and hill face to admire. This would greatly impede the view from our home and neighbouring properties. Who wants to swap that for a 30 metre invasive tower.

We feel that this tower could potentially devalue ours and our neighbours properties and also make the sale more difficult and a longer process to finalise. The properties on Birmingham Drive and Manchester circuit are all well maintained and property sales are in high demand.

We believe the farm land behind us was refused permission to sub-divide and also several homes were severely flooded due to lack of correct drainage, but now you are considering building a 30 metre tower on this land. You have previously rejected several inadequately drained sites so WHY accept this one after previous flooding issues. This is on your application site **Hills Face Zone** It is acknowledged that the development will have elements of visual impacts within this zone, adding to the fact it is not envisaged development within the Hills face zone, being non-complying, as stated in PDC 2. However, the proposed location of the facility has been chosen due to a number of reasons to minimise any impacts to the zone, locality and residents. The site is located as far away from residents as possible, while still meeting the coverage needs of the area. In terms, of screening the facility, the existing vegetation that existing on the allotment surrounds the proposed site protecting the view of the equipment shelter and bottom of the tower. The proposed site has vegetation that incorporates existing screening to comply with PDC 3 (a). Although being, a non complying development, the proposed facility is required infrastructure that meets the needs of the community in the Hill Face zones. Has this location been chosen due to the fact that Mr & Mrs Lombardo are the only ones in the area willing to accept your proposal at the resident expense!!!

You say that there are no health risks but that was also said about asbestos, roundup and Johnson baby products. These are only a few products that years later have come to the publics attention It may not be me that suffers but it may be my future family members that suffer health issues. Go online there are plenty of reviews that say there are health risks to vegetation, animals and humans. If you have proven evidence from an independent body that there are no health risks is this available for the public to view as we would be very interested in seeing this evidence.

We **strongly oppose** the construction of this tower for the above reasons. What next for the residents of surrounding areas more Telecommunication towers from Optus or permission to sub divide this land.

We are not opposed to future technology we are against this tower being so close to our homes. Would you want this in your back garden!!

Regards

Mark & June Holland



~~XXXXXX~~ CEO Playford Council

We would like to strongly disapprove the future construction of a telecommunication facility and associated fencing at 286 Craigmere Road Ulebury 5114.

We feel the proposed position is detrimental to the value and sale of the properties in the area due to the close proximity to the houses. When we purchased our home we were told that there would not be any housing or development to the rear of our property, this is a large reason why we purchased at all. The proposed tower is 40 metres from us and would have a visual impact as well as being extreme and unsightly.

Many people argue over health risks, which we have not been given any reassurance that this will not happen for us or our future family members.

This petition is agreed upon by the following signatures of residents and community members surrounding Birmingham Drive and Manchester Circuit. Contact Mark Holland 0413114065 OR June Holland 040127526

Name	Signature	Address	Date
June Holland	[Signature]	39 Birmingham Drive, Craigmere	9-12-19
Mark Holland	[Signature]	39 Birmingham Drive Craigmere	9-12-19
Renee Possingham	[Signature]	35 Birmingham Drive, Craigmere	9.12.19
Brad Possingham	[Signature]	35 Birmingham Drive, Craigmere	9/12/19
Daniel Chadwich	[Signature]	33 Birmingham Drive, Craigmere	9/12/19
Sandra Thornton	[Signature]	29 Birmingham Dr, Craigmere	9/12/19
PIANE-SWEET	[Signature]	25 BIRMINGHAM DRIVE CRAIG.	9/12/19.
Tonya Khebaty	[Signature]	15 Birmingham Drive Craigmere	9/12/19
Colin Cameron	[Signature]	9 " " " "	9/12/19
Deb Bell	[Signature]	7 Birmingham Dr	9/12/19
Lew Bell	[Signature]	7 Birmingham Dr	9/12/19
Dejan Bell	[Signature]	7 Birmingham Dr	9/12/19
Kayleen Bell	[Signature]	7 Birmingham Dr	9/12/19
Michael [Name]	[Signature]	5 Birmingham Dr	9.12.19
John [Name]	[Signature]	3 Birmingham Drive	9/12/19
Glen Clark	[Signature]	1 Birmingham Drive	9/12/19
Sill Bwes	[Signature]	4 Birmingham Drive	9/12/19
Rosanne Hockstep	[Signature]	15 Stafford Ct	9/12/19
Tyler Gillins	[Signature]	13 Stafford ct	9/12/19
Schulley [Name]	[Signature]	12 Stafford Ct Craigmere	9-12-19
Anthony [Name]	[Signature]	10 Stafford ct	9/12/19
Tone [Name]	[Signature]	9 Stafford crt craigmere	9-12-19
Sana Ayaz	[Signature]	7 Stafford Court Craigmere	9/12/19
Michael Rowen	[Signature]	5 Stafford Court, Craigmere	9/12/19

Developmental Application Number 292/1594/2019

To Chief Executive Officer

City of Playford

12, Bishopstone Road

Daveron Park

( December 2019

We the undersigned object to the proposal construction of a telecommunication facility and associated fencing at the proposed site of 286 Craigmores Road Ulebury Sa 5114

We feel the proposed position is detrimental to the value and sale of the properties in the area due to the close proximity to the houses.

The visual impact is overpowering to surrounding resident and the community.

Potential health risks are also a concern to us .

This petition is agreed upon by the following signatures of residents and community members surrounding Birmingham Drive and Manchester Circuit.

Name	Signature	Address	Date
Denis O'Brien		37 BIRMINGHAM DRIVE CRAIGMORE SA	9/12/19
Steve Hart		41 Birmingham Drive Craigmores	9/12/19
Pauline Hart		41 Birmingham Drive Craigmores	9/12/19
Leon Stanley		43 Birmingham Drive Craigmores	9/12/19
Mark Timpani		45 Birmingham Drive Craigmores	9/12/19.
Julie Smith		32 Manchester Ct Craigmores	9/12/19
Katrina Purdy		12 STAFFORD CRT CRAIGMORE	9/12/19.
Matt Tindley		30 Manchester Ct Craigmores	9/12/19.
Claire Sutton		22 Manchester Ct, Craigmores	9/12/19
Carl Bunnage		22 Manchester Ct Craigmores	9/12/19
TERRIE CORK		20 Manchester circuit Craigmores	9/12/19
ANDREW ODIERNEJO		18 Manchester circuit Craigmores	9/12/19
Ndene Bryant		1 Gloucester Drive Craigmores	
Daniel Ward		5 Gloucester Drive Craigmores	9-12-19
Kevin Poller		9 Gloucester Drive Craigmores	7.12.19
Mr Cooramus		17 Gloucester Dr. Craigmores	9/12/19.
Mr Cooramus		22 Gloucester Drive Craigmores	9/12/19.

Developmental Application Number 292/1594/2019

To Chief Executive Officer

City of Playford

12, Bishopstone Road

Daveron Park

( December 2019

We the undersigned object to the proposal construction of a telecommunication facility and associated fencing at the proposed site of 286 Craigmore Road Ulebury Sa 5114

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Potential health risks are also a concern to us .

This petition is agreed upon by the following signatures of residents and community members surrounding Birmingham Drive and Manchester Circuit.

Name	Signature	Address	Date
Kylie C. Cuyenduk		4 Stafford Ct Craigmore	9/12/19
Colin Frick		3 Stafford Court Craigmore	9/12/19
Wendy Mc Colton		13 STAFFORD CT CRAIGMORE	9/12/19
Malanne Collins		13 STAFFORD CT CRAIGMORE	9/12/19
Tru Collins		13 Stafford Ct Craigmore	9/12/19
Janet Clayton		2 Stafford Ct Craigmore	9/12/19
Trevor Clayton		2 Stafford Ct Craigmore	9/12/19
Stacy Kraatz		1 Stafford Ct Craigmore	9/12/19
Cara Langford		12 BIRMINGHAM DRIVE	9/12/19
Amy McKee		14 Birmingham Drive	9/12/19
Michelle Neuse		16 Birmingham Drive	9/12/19
L. Coard		18 BIRMINGHAM DRIVE	9/12/19
Mary McGee		20 BIRMINGHAM DRIVE	9/12/19
Jessie Spore		22 Birmingham Drive	9/12/19
MICK COARD		26 BIRMINGHAM DRIVE	9/12/19
T. Randall		26 Birmingham Dr.	9/12/19
L. COAD		26 Birmingham Dr	9/12/19
Emily Coad		26 Birmingham Dr	9-12-19
Cassidy Randall		26 Birmingham Dr	9/12/19
Jessie Spore		32 Birmingham Dr	9/12/19
Amy Brennan		32 Birmingham Drive	9/12/19
G. SCOTT		34 BIRMINGHAM DRIVE	9-12-19
M. SCOTT		34 BIRMINGHAM DRIVE	9-12-19

Developmental Application Number 292/1594/2019

To Chief Executive Officer

City of Playford

12, Bishopstone Road

Daveron Park

( December 2019

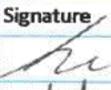
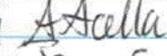
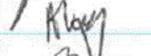
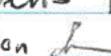
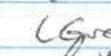
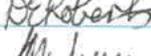
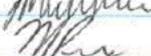
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This petition is agreed upon by the following signatures of residents and community members surrounding Birmingham Drive and Manchester Circuit.

Name	Signature	Address	Date
Sharon		36 Birmingham drive	9.12.19.
Alison Acella		Playford Primary School	11.12.19
Jacqui Jones		Playford School	11.12.19
Dylan		Playford Primary School	11.12.19
Tori		Playford primary school	11.12.19
Courtney		Playford primary school	11.12.19
Renee Demitt		c/- Playford PS	11.12.19
Grant Pepper		4 Ballard St, Eliz East	11-12-19
Tania Charley		22 Blackwood Drive, Craigmore	11.12.19
Bev Fisher		12 Tatura Ct Craigmore	11.12.19
Kerry Wood		30 Autumn Ave, Craigmore	11.12.19.
Stacy Leech		7 Florida Court Craigmore	11.12.19.
Angela King		39 Oxford Terrace Blakeview	11.12.19
G. MENZ		Walker Heights	11/12/19
Karen Roberts		Playford PS	11/12/19
Micarda Cichon		Playford Primary School	11/12/19
LEA Gray		PPS	11/12/19
Penny Park		PPS	11/12/19
Di Roberts		15 NORFOLK ST CRAIGMORE	11/12/19
Amy Muchara		PPS	11/12/19
Marg Pinney		P. P. S.	11-12-19.
A. Biernaux		P. P. S	11-12-19
R. Farnworth		P. P. S	11-12-19
K Dickinson			



Developmental Application Number 292/1594/2019

To Chief Executive Officer

City of Playford

12, Bishopstone Road

Daveron Park

( December 2019

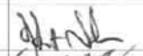
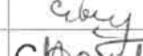
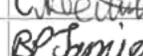
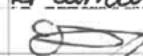
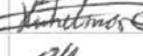
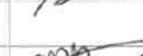
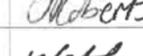
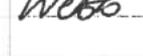
We the undersigned object to the proposal construction of a telecommunication facility and associated fencing at the proposed site of 286 Craigmere Road Ulebury Sa 5114

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The visual impact is overpowering to surrounding resident and the community.

Potential health risks are also a concern to us .

This petition is agreed upon by the following signatures of residents and community members surrounding Birmingham Drive and Manchester Circuit.

Name	Signature	Address	Date
John		18 Tooling Court G12 PARK	9/12/19
Les		33 Canillebank Court Craigmere	9/12/19
Linda		" " " "	9/12/19
Cheryl		4 Wecoma Court, Craigmere.	9/12/19
BRAD		10 GARRAD ST BLAKEVIEW	
Emma		4 Windsor ort Craigmere	9-12-19
Sonia		24 FINNIS ST, BLAKEVIEW	9-12-19
Jessica		145 Kingale Blvd Blakeview	9-12-19
Christine		27 Needlewood court Craigmere	9/12/19
Carla		6 Langhorne st Andrews farm	9/12/19
Nicole		12 Small crescent Smithfield Plains	9/12/19
Beth		7 Phillip Avenue, Craigmere	9/12/19
Louise		42 Flynnst Munnapara west	9/12/19
Kirra		15 Norfolk Street, Craigmere	9/12/19
Zoe		Charleston Cres Blakeview	9/12/19
Ruby		15 Emmeral Craigmere	9/12/19
Ashlee		95 Beckham rise Craigmere	9/12/19
Jen		36 Somerset Grove Craigmere	04/12/19
Mike		9 Leckie Lane Greenwith	9/12/19

**change.org**

Recipient: Telstra, Playford City Council

Letter: Greetings,

STOP the Telstra Tower!

# Signatures

Name	Location	Date
June Holland	Adelaide, Australia	2019-12-10
Todd McGuigan	Adelaide, Australia	2019-12-10
Rhiannon Styles	Australia	2019-12-10
Jamie Gordon-Edwards	Gawler, SA, Australia	2019-12-10
Kerin Matz	Hewett, Australia	2019-12-10
Amanda Douglas	Australia	2019-12-10
Renee Pobke	Adelaide, Australia	2019-12-10
Storm Andrews	Craigmore, Australia	2019-12-10
Krystal Findlay	Australia	2019-12-10
Rebecca Powell	Campbelltown, Australia	2019-12-10
Analicia Anderson	Cape Town, South Africa	2019-12-10
Shawna Stringer	Adelaide, Australia	2019-12-10
Mandi Thompson	Australia	2019-12-10
kim sawyers	Chch, New Zealand	2019-12-10
Emily Trevena	Adelaide, Australia	2019-12-10
Sandra Capasso	Australia	2019-12-10
Paula Malkin	Australia	2019-12-10
Mel Butler	Adelaide, Australia	2019-12-10
Mel Gore	Happy Valley, Australia	2019-12-10
Lyndal Barrett	Elizabeth park, Australia	2019-12-10

<b>Name</b>	<b>Location</b>	<b>Date</b>
Sharna Butler	Hilton, Australia	2019-12-10
Tamara Alexander	Australia	2019-12-10
Leisa Hunter	Melbourne, Australia	2019-12-10
Courtney Munro-Thompson	North Adelaide, Australia	2019-12-10
Di Scott	Australia	2019-12-10
Benjamin Wileman	Adelaide, Australia	2019-12-10
Bradley Packham	Adelaide, Australia	2019-12-10
Peter Butler	Adelaide, Australia	2019-12-10
Brooke Watson	Craigmore, Australia	2019-12-10
Narelle Penhall	Australia	2019-12-10
Adam Powell	Findon, Australia	2019-12-10
rebecca myers	Australia	2019-12-10
Renee Bennett	Para Hills West, Australia	2019-12-10
Jayden Keys	Adelaide, Australia	2019-12-10
Steven Thompson	Adelaide, Australia	2019-12-10
Lynette Deakin	Craigmore, Australia	2019-12-11
John McGuigan	Adelaide, Australia	2019-12-11
Anne Lockwood	Elliston, Australia	2019-12-11
Sean McKibbin	Craigmore, Australia	2019-12-11
Karen Gams	Ridleyton, Australia	2019-12-11
Leeanne Bloor	Adelaide, Australia	2019-12-11

<b>Name</b>	<b>Location</b>	<b>Date</b>
Fiona Reid	Adelaide, Australia	2019-12-11
Sharna Butler	Hilton, Australia	2019-12-11
Wendy Lockyer	Angle vale, Australia	2019-12-11
jai Butler	Broadview, Australia	2019-12-11
Jodie Hooer	Angle vale, Australia	2019-12-11
John Croft	Craigmore, Australia	2019-12-11
Vicki Mysko	Elizabeth North, Australia	2019-12-11
Karlee Burge	Blakeveiw, Australia	2019-12-11
Joanne Bourke	Australia	2019-12-11
Philip Holland	Gawler, Australia	2019-12-11
Denise Hayward	Craigmore, Australia	2019-12-11
Jenny Conn	Payneham, Australia	2019-12-11
Shane ROSENGREN	Footscray, Australia	2019-12-11
Wendy Gaborit	Adelaide, Australia	2019-12-11
gerard rafferty	Windsor Gardens, Australia	2019-12-12
Kylie McGuigan	Cronulla, Australia	2019-12-12
Joanne Campione	Gold Coast, Australia	2019-12-12
Daniel Cross	Gawler, Australia	2019-12-12
Paul Miranda	Adelaide, Australia	2019-12-12
Julie Evans	Barnsley, England, UK	2019-12-12
S St Ange	Barnsley, England, UK	2019-12-12
Luke Holland	Craigmore, Australia	2019-12-13

<b>Name</b>	<b>Location</b>	<b>Date</b>
Yasmin Wildman	Manningham, Australia	2019-12-13
Paul Todd	Craigmore, Australia	2019-12-13
Shain May	Australia	2019-12-13
Jaye Nichols	Elizabeth Downs, Australia	2019-12-13
Peter Zervas	Adelaide, Australia	2019-12-13
Karin Synnett	Para Hills, Australia	2019-12-13
Ian Barges	Australia	2019-12-13



2:22pm

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

IAN Shields + Pam Shields

Postal address:

29 Manchester Circuit  
Craigmore SA 5114

Contact telephone No.

0437 290 290

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

adjoining Residents

Reasons for representation (please attach  
additional sheet(s) if required)

To close to surrounding houses needs  
to be a distance away from homes. Besides this an eyesore, told  
when we bought land nothing was going to be built on around  
area. Its not acceptable close to homes with so much empty  
land elsewhere. It would also lower house prices. Why should  
we be paying high rates for a nice area to be split. I also  
have medical reasons - diagnosed with a tumour

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed: 

Date: 12/12/19

DEVELOPMENT ACT, 1993



STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer
City of Playford
12 Bishopstone Road
DAVOREN PARK SA 5113

Name of Person(s) making representation:

AIAN THOMAS CORK

Postal address:

TERRIE LYNNE CORK
20 MANCHESTER CIRCUIT
CRAIGMORE 5114.

Contact telephone No.

Nature of Interest / Affected by Development
(eg adjoining resident, owner of land in vicinity,
or on behalf of an organisation or company)

OWNER OF LAND IN
VICINITY OF TOWER.

Reasons for representation (please attach
additional sheet(s) if required)

THE TOWER WILL BE
AN EYESORE AND VISABLE FROM MY GARDEN,
IT WILL ALSO BRING THE VALUE OF MY
PROPERTY DOWN

I support the proposal [ ]

I do not support the proposal [x]

My representation would be overcome by:
(state action sought) (please attach additional
sheet(s) if required)

Blank lines for providing details on how the representation would be overcome.

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: ALAN CORK

Signed: *[Signature]*

Date: 6-12-2019

DEVELOPMENT ACT, 1993

**STATEMENT OF REPRESENTATION**  
Pursuant to Section 38 of the Development Act, 1993

Development Application No: **292/1594/2019**

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation: Annette Timpano  
Postal address: 45 Birmingham Drive  
Craigmore 514  
Contact telephone No. 0431 087 045

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company) Adjoining Resident +  
owner of land in vicinity

Reasons for representation (please attach  
additional sheet(s) if required) Depreciation of  
value of our property due to proximity to  
proposed tower location + visual distraction  
of way tower from all sections of our  
backyard.

I support the proposal  I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required) Selecting another  
appropriate location.

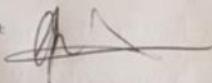
playford.sa.gov.au

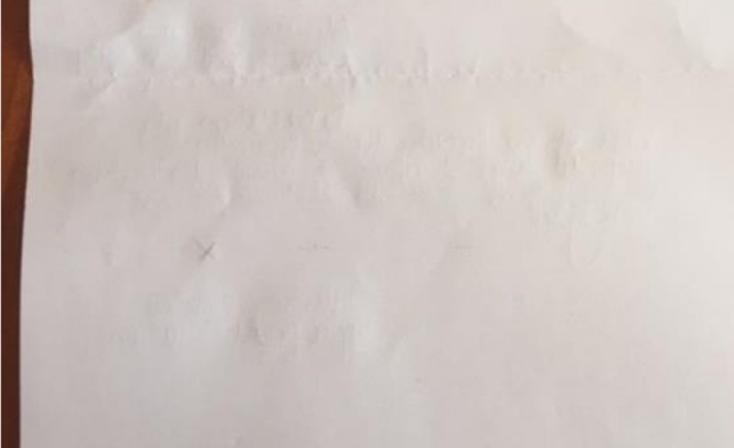
Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY   
(If more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:   
Name: \_\_\_\_\_

Signed:  Date: 12/12/19



 playford.sa.gov.au

**Megan Leverington**

---

**From:** Claire Sutton <clairejsutton@gmail.com>  
**Sent:** Thursday, 12 December 2019 4:29 PM  
**To:** Plan  
**Subject:** [SUSPICIOUS] Statement of Representation for Development Application 292/1594/2019

**This Message originated outside your organization and sent from a freemail service.**

---

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

**Name of person(s) making representation:** Claire Sutton & Carl Burridge

**Postal Address:** 22 Manchester Circuit, Craigmore SA 5114

**Contact telephone No.** 0406 763 929

**Nature of Interest / Affected by Development (eg adjoining resident, owner of land in vicinity, or on behalf of an organisation or company):** Owner of land in vicinity

**Reasons for representation:**

A 30m comms tower is not suitable to be positioned so close to residential properties. The value of properties in the vicinity and the saleability of them will be significantly negatively impacted.

The street and area is a very neat, tidy, well looked after, quiet residential area. Everyone is proud of the look of their properties and have worked hard to achieve that. The houses all fall under conditions to keep the uniformity of the street looking nice and consistent, such as roof colours and fencing. To put a huge, ugly tower directly behind them will ruin the natural setting and detract from the overall look of the area. It's completely unfair that residents have been in-keeping and on board with the restrictions of the development of their properties, only to have the whole look of the street impacted by a tower development.

I know the comms towers also emit a pretty loud humming noise and have lights at night, this is not suitable to be positioned so close to residential properties.

I do not support this proposal.

**My representation would be overcome by:**

The location being in a more suitable place - further away from residential properties. Like other comms towers I have seen, these are positioned in parks/ovals/commercial areas, not on a beautiful residential street.

---

I DESIRE TO BE HEARD PERSONALLY (Y)

Signed: Claire Sutton  
12/12/2019



Bradley and Renee Possingham  
35 Birmingham Drive  
CRAIGMORE SA 5114  
Email: renpos79@hotmail.com

12 December, 2019

Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Dear Sir / Madam,

Please find enclosed our 'Written Representation' in regards to **Development Application Number: 292/1594/2019 (Non-Complying)** for the construction of a telecommunications facility and associated fencing located at 286 Craigmores Road, ULEYBURY SA 5114.

It should be noted that we may be overseas when this development is presented to Council's CAP for consideration. Therefore, a representative from Planning Solutions (SA) Pty Ltd will attend the meeting to address the Panel on our behalf.

The contact details for Planning Solutions (SA) Pty Ltd are as follows:

Mr Trevor White

Phone: 08 8523 3890

Email: [trevor@planningsolutionssa.com.au](mailto:trevor@planningsolutionssa.com.au)

It would be appreciated if future correspondence regarding this matter be made to us via both email and postal mail as we may not be able to be contacted by phone. Our email address is [renpos79@hotmail.com](mailto:renpos79@hotmail.com).

Yours sincerely,

Bradley and Renee Possingham

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

Bradley and Renee Possingham

Postal address:

35 Birmingham Drive, Craigmore SA 5114

Contact telephone No.

0419 853 863

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Adjoining resident

Reasons for representation (please attach  
additional sheet(s) if required)

\* Please see attached sheets \*

- High visual impact
- Impact on natural environment, including native wildlife
- Close proximity to existing residential properties
- Impact on property valuation

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

State action sought

---



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Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: Planning Solutions (SA) Pty Ltd

Signed: *B.P. Passingham*  
*R. Pomoy*

Date: *12/12/2019*

Bradley and Renee Possingham  
35 Birmingham Drive  
CRAIGMORE SA 5114  
Phone: 0419 853 863  
Email: renpos79@hotmail.com

12 December, 2019

Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

**Re: Development Application Number: 292/1594/2019 (Non-Complying) for the construction of a telecommunications facility and associated fencing located at 286 Craigmere Road in the Area known as Craigmere.**

Dear Sir / Madam,

We are the owners of a property located at 35 Birmingham Drive in Craigmere, where the location of the development is located within 30 metres from our rear boundary, and as such we strongly oppose the proposed construction of a telecommunications facility located at 286 Craigmere Road, Uleybury SA 5114. We request that the members of CAP refuse the application regarding this proposed development for the following reasons.

**Nature of Proposed Development:**

The 'subject land' of the proposed development is located within the Hills Face Zone of the Playford Council Development Plan (21 April 2016 – consolidation) where all development, except where located within the Watershed Policy Area 2, is a non-complying form of development.

Reference to the Desired Character for the Hills Face Zone, which is focused on ensuring that development within the zone not only preserves but also enhances the natural character of the zone or in the re-establishment of the natural character. A 30 metre high monopole tower can hardly be argued to be enhancing or re-establishing the natural character of the zone.

**Visual Impact:**

Reference has also been made to the policy provisions within the Zone with reference to the following PDC.

**PDC 23** *Communication towers and masts should be sited and designed to minimise their visual impact. The number of masts should be contained by shared use of facilities.*

Council's Development Plan has regard to telecommunication towers in the Hills Face Zone through PDC 23 by referencing siting of the tower, minimising their visual impact and limiting the number of masts or towers through co-existing with other telecommunication providers.

The applicant states that the proposed tower will "be located and designed to minimise impact on the amenity and the surrounding area" (page 11) and claims that "the proposal does not unreasonably impact upon the locality" (page 5). We argue that the construction of a 30 metre high telecommunications monopole will have a significant impact on the local environment and residents of both Birmingham Drive and Manchester Circuit, Craigmore. The semi-rural location was the main reason we purchased our property back in 2014. We remember viewing our property for the first time and admiring the natural environment that was both to the side and rear of the house.

The real estate agent stressed to us that these rural properties were never to be developed, yet we are now being presented with a proposal to develop this site. We never would have purchased this property had we known that a telecommunications facility was to be built on the adjoining property in the future.

It does not matter how you try and sugar coat the argument that the tower will not unreasonably impact on the locality as the proposed tower is located extremely close to dwellings (sensitive receptors), you cannot hide it and the fact remains it is an intrusion on the amenity of the locality and has an impact on the adjoining residential properties.

**PDC 2** *Development listed as non-complying is generally inappropriate.*

This proposal is located in the Hills Face Zone where the construction of a telecommunications tower is a non-complying form of development, where PDC 2 which reinforces our view that the development is inappropriate for the location and therefore should not be supported.

Reference has also been made to PDC 1 of the Hills Face Zone, which states the following:

**PDC 1** *Development should not be undertaken unless it is associated with a low intensity agricultural activity, a public open space area or a private use of an open character, or is a detached single storey dwelling, including outbuildings and structures normally associated with such dwellings, on a single allotment.*

The proposal fails to satisfy any of the envisage uses in PDC 1, where the primary focus is low intensity agricultural activities and single storey detached dwellings on single allotments.

### **Native Vegetation and Wildlife:**

The proposal also states that "the allotment is very well vegetated, creating a strong screening for the facility on the property" (page 11). We strongly disagree with this statement. If you look at the aerial view of the property that was provided by Visionstream on page 11, there are in fact a small number of trees and vegetation surrounding the proposed location for the telecommunications facility.

The vegetation is sparse in this area when compared with the vegetation closer to the owner's house. Yes, there are some trees, but they will not create "a strong screening" for a 30 metre high monopole. A monopole of this size will not be screened by a few trees that are 15 metres or less, and will have a significant visual impact on our properties.

It should also be noted that the proposed development will be set on the top of a hill / rise, which will be very visible as people drive up Craigmores Road and will take away from the surrounding rural setting. This is indicated in Figure 5 on page 13 of Visionstream's proposal. We would argue that a telecommunications facility of that size does not, in any way, enhance the natural character of the native landscape. It will ruin the natural beauty of the surrounding area and will, therefore, have a high visual impact on residents in the immediate locality.

In the 5 years that we have lived on our property we have observed an abundance of native wildlife surrounding the proposed site including reptiles, different species of birds, kangaroos and even the occasional koala. All of which, we feel, will be impacted on if this telecommunications facility is approved. While Visionstream claim they will not be clearing any vegetation to build the facility, it is not known what effect the noise and radiofrequency fields will have on the local native wildlife.

### **Interface between Land Uses:**

Another reason we strongly oppose the development proposal is the fact that it will be in close proximity to our houses. In their proposal, Visionstream state that the facility will be "well separated from established residential properties" (page 16) yet indicate that the site will be "situated approx. 30 metres to the east of the residential zone" (page 11). It cannot be argued that 30 metres is a long distance from residential properties.

It will, in fact, be within very close proximity to properties. This not only creates a visual impact but also raises health concerns for local residents. Facilities, such as the one proposed, have not been around long enough for telecommunication companies to question the validity of health concerns. It was not that long ago that asbestos and tobacco were deemed safe, yet we now know they are far from safe for our health.

Visionstream and Telstra may argue that "all expert reviews on the health effects of exposure to radiofrequency fields have concluded that no adverse health effects have been established to radiofrequency fields" (page 17). However, they cannot guarantee telecommunication facilities will not have an adverse effect on people's health long term. They simply have not been around long enough. We put this question to you. Would you honestly choose to live within metres of a telecommunications facility? Probably not.

Reference has also been made to the General Modules contained in Council's Development Plan, with reference to the 'Interface between Land Uses' Module, which states the following:

**Objective 1** *Development located and designed to minimise adverse impact and conflict between land uses.*

**Objective 2** *Protect community health and amenity from adverse impacts of development.*

**Objective 3** *Protect desired land uses from the encroachment of incompatible development.*

The proposed development is located 30 metres from residential properties and therefore will have an impact on occupants of the residential properties, through visual impact, possible health issues and failing to protect the existing natural environment from encroachment from incompatible development. Previously in this communication it was indicated that non-complying forms of development were inappropriate for the Zone, hence the proposed development fails to satisfy the 3 primary objectives listed above.

### **Property Valuation:**

It is always argued by the developers that property devaluation is not a planning issue and should not be taken into consideration when assessing the development proposal, however in reality developments such a telecommunication tower do have an impact on the future sale of residential properties in close proximity to such facilities.

We have been in contact with several local real estate agents who have stated that a telecommunications monopole will decrease the value of all properties in the street as there will be less people prepared to live near this type of structure, less interest at the time of sale which leads to the devaluation of our property value. This issue does not just impact on us but impacts on several other properties in the immediate locality of the tower.

### **Conclusion:**

In conclusion, we strongly oppose the proposed construction of a telecommunications facility located at 286 Craigmore Road, Uleybury. We request that Council's CAP refuse the application regarding this proposed development on the grounds that it will have a high visual impact on surrounding residents, will impact native wildlife in the area, is too close to existing housing, raises health concerns for local residents, and decrease the market value of our properties.

As we may be overseas when this development is presented to Council's CAP for consideration a representative from Planning Solutions (SA) Pty Ltd will attend the meeting to address the Panel on our behalf.

Yours sincerely,



Bradley and Renee Possingham

**From:** ANDREW BELLAMY  
**Sent:** Sun, 8 Dec 2019 13:28:20 +1030  
**To:** Plan  
**Subject:** Statement of Representation for Development Application 292/1594/2019  
**Attachments:** 20191208122100\_001.pdf

Playford City Council,

Please find my Statement of Representation for Development Application 292/1594/2019; attached.  
Please confirm that you've received the attachment.

Best,  
Andrew Bellamy

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

Andrew Bellamy

Postal address:

24 Grandview Place, Blakeview,  
South Australia, 5114

Contact telephone No.

0466 104 678

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Owner of land in vicinity

Reasons for representation (please attach  
additional sheet(s) if required)

The proposed location is too close to residential view and has considerable visual impact. A tower has already begun construction on Craigmare Road and this should be sufficient. Elsewise the council should reconsider Candidate F, since this poses less visual impact.

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

Selection of site aside from Candidates H, I and J. The best choice is Candidate F.

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed: 

Date: 8/12/2019



10 January 2020

Megan Leverington  
City of Playford  
Statutory Planning Department  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Via email: [plan@playford.sa.gov.au](mailto:plan@playford.sa.gov.au)  
CC [mleverington@playford.sa.gov.au](mailto:mleverington@playford.sa.gov.au)

Dear Megan,

**Re: Response to Representations  
Planning Application Reference 292/1594/2019  
(Non-Complying) for the construction of a telecommunications facility and  
associated infrastructure  
286 Craigmore Road, ULEYBURY SA 5114**

I refer to the above Development Application and the recent advertising/notification undertaken. Below we provide responses to each of the main points raised in the submissions from the surrounding residents.

### **Visual Impact**

Telstra advises that the location of telecommunications facilities to service urban and suburban communities is nowadays commonplace.

Nevertheless, Telstra does seriously consider visual impact when siting and designing telecommunications facilities. Given that clear line of sight is integral to the functioning of any telecommunications facility, it is not possible to completely mitigate all impacts on surrounding view sheds. Telstra appreciates that a balance must be struck between amenity and service, without undue compromise to either. Accordingly, we have sought to implement this balance at 286 Craigmore Road, Uleybury by choosing a location that

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[www.visionstream.com.au](http://www.visionstream.com.au)



best minimises the potential visual impact of all identified candidates investigated and outlined in summary above.

Telstra endeavors to minimise the visual prominence of the facility wherever it is possible to do so. There are restrictions in lowering the height of a telecommunications facility, as the panel antennas must be at a height where there are no obstructions between the antenna and the service area, Telstra has proposed the facility at the minimum height capable of achieving the technical requirements for the site. Telstra appreciates that the construction of a monopole introduces a new element to the environment, however we maintain it is not unreasonable to propose such infrastructure in a community and residential setting, and that we have sought to minimise the impact of the proposal as best as possible.

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

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

To alleviate some of the visual impact concerns however, Telstra is willing to paint the facility in a color suitable to Council.

### **EME & Health**

Telstra works diligently to find a balance between providing high quality services and minimising our impact on the community and the local environment.

With regards to the raised health concerns I want to assure you that Telstra places very high importance on EME safety. The proposed facility will need to fully comply with Australia’s Safety Regulations RPS3 set by ARPANSA.

Furthermore, the safety measures are not based on distance, or creating “buffer zones” for residential areas, places of employment, schools or any other specific environment, instead the environmental standard limits the network signal strength to a level low

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enough to protect all people, in all environments, 24-hours a day. The safety limit itself, recommended by the World Health Organisation (WHO), has a significant safety margin, or precautionary approach built into it.

The Environmental EME Report for the proposed facility illustrates the estimated maximum radiofrequency (RF) electromagnetic energy (EME) levels of the proposed facility at the surrounding areas are (less than 1% of the Australian Standard RPS3). A copy of the Environmental EME Report for this proposed facility is attached for your information.

The maximum EME level is calculated based on a worst-case scenario that assumes that the facility is operating at maximum power. Mobile phone base stations rarely operate at full power, but instead automatically adjust their power draw based on the amount of mobile traffic – calls and data downloading/uploading – being accessed by mobile users at any one time.

The proposed site is planned to operate on the 4G network, the electromagnetic frequencies used for 4G are part of the radio frequency spectrum which has been extensively researched in terms of health impacts for decades.

Over 50 years of scientific research has already been conducted into the possible health effects of the radio signals used for mobile phones, base stations and other wireless services. The data from this research has been analysed by many expert review groups. Weighing the whole body of science, there is no evidence to convince experts that exposure below the guidelines set by ARPANSA carries any known health risks, for adults or children.

The EMF-Portal ([www.emf-portal.org](http://www.emf-portal.org)) is an open-access extensive database of scientific research into the effects of EMF, including studies on the effects of RF on health. It is managed by the RWTH Aachen University, Germany and linked from the WHO website. EMF-Portal contains more than 25,000 published scientific articles on the biological and health effects of EMF and 2,500 studies on mobile communications.

For further information I recommend the following resources:

- <http://www.emexplained.info/?ID=24503>
- <https://www.who.int/features/qa/30/en/>

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Please note that the current proposal does not include the provision of 5G technology that some of the representations have expressed concern with. While it is not proposed at this stage it maybe included in the future.

In terms of research specifically on 5G frequencies, the database lists approximately 350 studies on mmWave EMF health related research.

There has been a lot of misinformation about 5G and EME. You may like to visit the following Telstra links to find out about the latest science on 5G and EME:

- <https://www.telstra.com.au/consumer-advice/eme/5g-and-eme>
- <https://exchange.telstra.com.au/understanding-5g-and-eme/>
- <https://exchange.telstra.com.au/5-things-you-should-know-about-5g-and-eme/>
- <https://exchange.telstra.com.au/5-surveys-of-5g-show-eme-levels-well-below-safety-limits/>

### **Property Devaluation**

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

Fluctuations in price being subject to a vast number of factors – many of which are subjective such as amenity, access to transport, condition of land improvements, views and increasingly the quality and availability of telecommunications services. However, often significant are broader market forces affecting supply and demand for housing.

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

It is further noted that since the 1990's, there have been thousands of telecommunications facilities developed throughout Australian metropolitan and regional areas. During this period property values across the board have continued to increase, showing no sign of deterioration as a result of specific factors such as the location of telecommunications base stations. The improvements to mobile network connectivity

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resulting from improved service coverage is likely to be very significant, which will in turn support business, health, education and a range of other sectors.

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

### **Noise impact**

There is expected to be some low-level noise from the ongoing operation of air conditioning equipment wholly contained within the equipment shelter, once installed. Noise emanating from the air conditioning equipment is expected to be at a comparable level to a domestic air conditioning installation and should generally accord with the background noise levels prescribed by relevant guidelines. No undue noise impacts resulting from the ongoing operation of the facility are anticipated.

### **Availability of sites**

During preliminary stages of the proposal, a number of sites were investigated for their potential for a Telecommunications facility. Through the process these proposed candidates were discounted on a number of grounds, including willingness of the land owner, site access and radio frequency coverage.

There were no available structures of a sufficient height that could accommodate a Telstra base station and therefore a new greenfield facility at the proposed location was selected.

### **Response to the siting within a Hills Face Zone**

In response to concerns raised in regard to the development within the Hills Face Zone, telecommunications facilities are assessed differently to residential development and other types of developments, including subdivision that is mentioned within the representations.

Telstra's proposal has been strategically sited and designed to comply with Principle 23 (Form and Character Section) which states the following;

23. *Communication towers and masts should be sited and designed to minimize their visual impact. The number of masts should be contained by shared use of facilities.*



The facility is located outside of a residential zone and within a semi-rural area, that is considered the most appropriate for the facility to improve existing Telstra service in the area. In this instance there is no other structure within the surrounding area that could provide a Telstra base station and therefore a new monopole is required.

It should be noted that Telecommunications Facilities exist at numerous locations within the Hills Face Zone. One example within the Playford Council area is located on the corner of Precolumb Road and Johnson Road, One Tree Hill.

Moreover, a 'Telecommunications Facility' is not a Prohibited Use within the Hills Face Zone pursuant to the Playford Development Plan, but instead a Category 3 Development that requires Council's approval.

### **Conclusion**

Furthermore, we note the critical role the facility would play in cases of emergency events. Whether it be checking the CFS websites in cases of bushfire or calling family members on mobile phones during emergency situations, the improvements delivered by the facility will be significant, and we encourage Council to carefully consider these when assessing the Application alongside the representations received.

Kind regards,

A handwritten signature in blue ink, appearing to read 'CN'.

Clinton Northey  
Senior Town Planner | Visionstream

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# What is 5G?



5G is the 5th generation of mobile networks, a significant evolution of today's 4G networks.

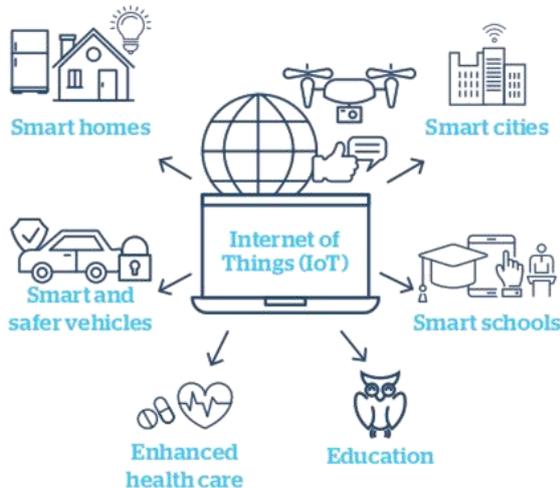
5G is designed to meet the very large growth in data and connectivity of today's modern society, the internet of things with billions of connected devices, and tomorrow's innovations.

5G will initially operate in conjunction with existing 4G networks before evolving to fully standalone networks. The rollout of 5G will help meet Australians' growing demand for more data, with the Australian Communications and Media Authority (ACMA) reporting that the volume of data downloaded on mobiles has increased by 41% from June 2017 to June 2018, and this is set to continue.

## What will 5G enable?

5G will enable enhanced mobile broadband, instantaneous connectivity to billions of devices, the Internet of Things (IoT) and a truly connected world.

**For communities, 5G will enable real-time connection of billions of devices to provide a safer and more efficient place to live by enabling things like:**



**For businesses and industry, 5G and IoT will provide a wealth of data allowing them to gain insights into their operations like never before.**

**Business will increasingly operate and make key decisions driven by data (e.g. parcel tracking), and innovate in different application areas including agriculture, smart farms and manufacturing. All of these will pave the way for cost savings, better customer experience and long-term growth.**

**5G enabled mobile technology**  
 IS SET TO DELIVER A  
**\$65 billion bigger Australian economy**  
 BY 2023

# What is 5G?

## What will be the first applications for 5G?

5G-enabled products such as wireless broadband, mobile devices and IoT will be the first applications using 5G.



## What will 5G devices offer?

The prime benefits of 5G devices will be significantly faster speeds in data access, downloading and streaming content.

In addition, 5G devices will have increased computing power and make use of faster connectivity, meaning that the devices will enjoy virtually instantaneous connections to the network, as well as greater connectivity when on the move. 5G will enable applications such as remote monitoring, automation of production, medical monitoring and even remote surgery.



## How does 5G work?

5G will deliver faster speeds, better response times and greater capacity. 5G networks are designed to work in conjunction with 4G networks using a range of macro cells, small cells and dedicated in-building systems.

Small cells will be a feature of 5G networks and will evolve to include the use of millimetre wave (mmWave) frequencies.

Small cells are mini base stations designed for very localised coverage typically from 10 metres to a few hundred metres providing in-fill for the larger macro network. Small cells will be essential for the 5G networks.

5G devices will have increased computing power and make use of faster connectivity, meaning that the devices will enjoy virtually instantaneous connections to the network, as well as greater connectivity when on the move.



# 5G and EME Safety

## Are there safety limits for 5G?

**Yes. Comprehensive international guidelines exist governing exposure to radio waves including the frequencies proposed for 5G.** The limits have been established by independent scientific organisations, such as the International Commission on Non-Ionizing Radiation Protection (ICNIRP), and include substantial margins of safety to protect all people including children and the elderly at all times.

These guidelines have been widely adopted in standards around the world, including in Australia by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and are endorsed by the World Health Organization (WHO).

### WHAT DO THE EXPERTS SAY ABOUT 5G AND HEALTH?

In relation to radio frequency exposures and wireless technology and health, including frequencies used for 5G, the World Health Organization (WHO) states:

**“Despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health.”**

In relation to 5G frequencies, Dr Sarah Loughran, Director of the Australian Centre for Electromagnetic Bioeffects Research at the University of Wollongong states:

**“The higher frequencies [of 5G] actually means that the energy doesn’t penetrate as deeply into the body than previous fourth generation and other generation technologies have.”**

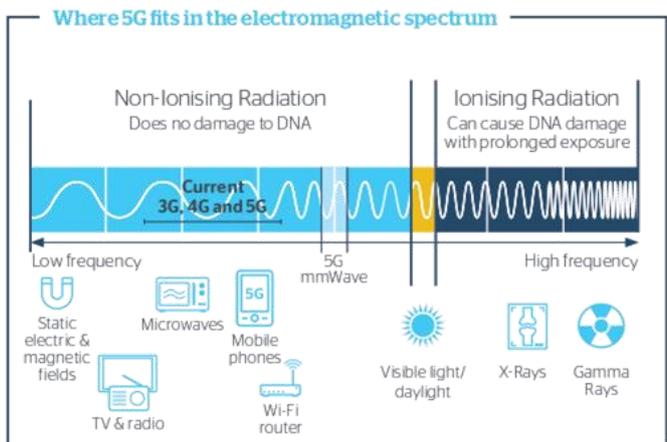
In relation to 5G and health, ARPANSA states:

**“There are no established health effects from the radio waves that the 5G network uses.”**

## What research into health effects has been done on 5G?



**The electromagnetic frequencies used for 5G are part of the radio frequency spectrum which has been extensively researched in terms of health impacts for decades.**



5G operates at a higher frequency than previous 4G networks so it can carry more data but can't travel as far. This means it will have less impact on the human body than any previous network.

Over 50 years of scientific research has already been conducted into the possible health effects of the radio signals used for mobile phones, base stations and other wireless services including frequencies planned for 5G and mmWave exposures.

### ARPANSA states:

**“This network currently runs on radio waves similar to those used in the current 4G network, and in the future will use radio waves with higher frequencies. It is important to note that higher frequencies does not mean higher or more intense exposure. Higher frequency radio waves are already used in security screening units at airports, police radar guns to check speed, remote sensors and in medicine and these uses have been thoroughly tested and found to have no negative impacts on human health.”**

# 5G and EME Safety

**Testing on Australian 5G networks with commercial devices in real-world settings shows levels similar to 3G, 4G and Wi-Fi, and in many cases around 1,000 times below the safety limits.**



## Does 5G mean higher power and higher exposure levels?

**No - 5G networks are designed to be more efficient and will use less power than current networks for similar services.**

The Australian Centre for Electromagnetic Bioeffects Research (ACEBR) states:

**“In addition, while more antennas may be required to service areas where demand for the new service is high, users are closer to the mobile phone base station and therefore their devices can operate at a reduced power, reducing their exposure from their personal device.”**

Dr Sarah Loughran, Director of the Australian Centre for Electromagnetic Bioeffects Research at the University of Wollongong, states:

**“Based on the improvements in technology, the level of exposure is expected to be lower [with 5G] than what it has been in previous technologies.”**

## How will 5G be regulated?

All base stations including 5G equipment and devices, must comply with standards set by ARPANSA.



### Where can I get more information on 5G?

#### Australian Communications and Media Authority (ACMA)

1300 850 115

<https://www.acma.gov.au/theACMA/a-guide-to-small-cells>

#### Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)

(03) 9433 2211

[www.arpansa.gov.au](http://www.arpansa.gov.au)

#### EMF Explained web site

[www.emfexplained.info](http://www.emfexplained.info)

#### Mobile Nation 2019 - the 5G future report

<https://amta.org.au/new-mobile-nation-report-the-5g-future/>

#### Mobile Carriers Forum

<http://amta.org.au/mcf>



Australian Mobile Telecommunications Association

(02) 8920 3555

[contact@amta.org.au](mailto:contact@amta.org.au)

[www.amta.org.au](http://www.amta.org.au)



# 5G and Electromagnetic Energy (EME)

## Fact sheet

### Is 5G Safe?

- At Telstra we take our responsibilities regarding the health and safety of our customers and the community very seriously. We also acknowledge that some people are genuinely concerned about the possible health effects from electromagnetic energy (EME) and we are committed to addressing those concerns responsibly.
- 5G wireless networks are designed to be very efficient and minimise EME. This means that both the network and device power will be low, which means low levels of EME on 5G.
- The advice from the World Health Organisation (WHO) is that 'there is no evidence that exposure to low level EME is harmful to human health'.
- Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), the agency of the Commonwealth Government tasked with protecting people and the environment from the harmful effects of radiation, says that "there is no established health effects from the radio waves that the 5G network uses".
- We have read the extensive research reviews from international governmental health agencies and standards setting committees, conducted our own assessments and follow the safety standards set by the Australian Health Department.
- The existing safety standards cover 5G, include children and are conservative.
- The frequencies and power levels we are using today for 5G are similar to 3G and 4G.
- Over 50 years of scientific research has already been conducted into the possible health effects of the radio signals used for mobile phones, base stations and other wireless services, including the frequency bands now being redeployed for 5G.

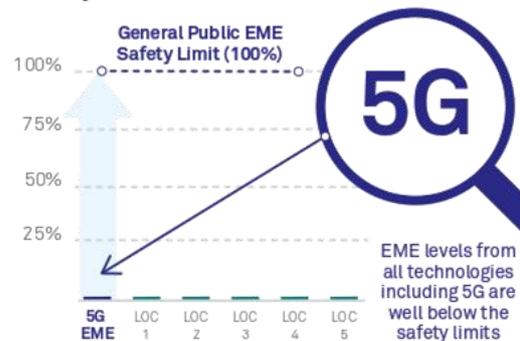
**We are confident that 5G adds no risk compared to existing technologies.**

### What testing has Telstra done in relation to 5G?

- We have done extensive EME testing on our 5G network at different locations including a school, café, apartment, sports field and in the street.
- We have found the EME levels to be similar to 3G, 4G and WiFi.
- The EME levels measured were found to be well below the safety limits, and in many cases over a thousand times lower.
- We continually monitor our network and the ACMA conduct EME compliance audits.



### 5 Surveys of 5G and EME



## 5G and small cells

### Will Telstra be using small cells for 5G?

- Initially we are not using small cells for Telstra's 5G deployment. We are upgrading existing base stations for 5G.
- In the future Telstra will be using a range of different base stations for 5G including small cells.

### Will small cells be built on every street for 5G?

- Currently, Telstra does not plan or need to build small cells on every street for 5G.
- In future years, mmWave small cells with a shorter range may be used extensively in residential & commercial areas where customers need access to quality high speed and high capacity mobile services.

Small cells are not new and have been used for many years to enhance capacity and boost coverage.

### Do small cells have high EME?

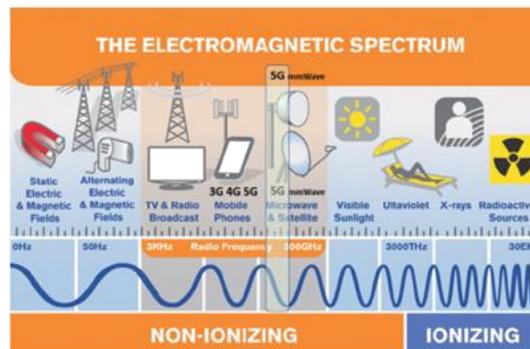
- No, small cells operate at low power and have low EME levels.
- Telstra has tested a range of small cells and found the EME levels around small cells to be very low and well below the EME safety limits.



A typical 4G small cell in a suburban street

### What is mmWave and is it safe?

- Telstra 5G technology does not currently use mmWave frequencies, however we plan to use mmWave in the future when spectrum becomes available.
- mmWave is not new, it's a higher frequency band that is already being used for communications.
- The existing EME safety standards and extensive research to date includes mmWave.
- Telstra's mmWave 5G trials showed EME levels were very low and similar to existing technologies.



## Resources

Source	Website
Telstra.com	<ul style="list-style-type: none"> <li><a href="https://www.telstra.com.au/consumer-advice/eme/5g-and-eme">https://www.telstra.com.au/consumer-advice/eme/5g-and-eme</a></li> </ul>
Telstra Exchange Articles – public information on 5G and EME	<ul style="list-style-type: none"> <li><a href="https://exchange.telstra.com.au/understanding-5g-and-eme/">https://exchange.telstra.com.au/understanding-5g-and-eme/</a></li> <li><a href="https://exchange.telstra.com.au/5-things-you-should-know-about-5g-and-eme/">https://exchange.telstra.com.au/5-things-you-should-know-about-5g-and-eme/</a></li> <li><a href="https://exchange.telstra.com.au/5-surveys-of-5g-show-eme-levels-well-below-safety-limits/">https://exchange.telstra.com.au/5-surveys-of-5g-show-eme-levels-well-below-safety-limits/</a></li> </ul>
Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)	<ul style="list-style-type: none"> <li><a href="https://www.arpansa.gov.au/news/misinformation-about-australias-5g-network">https://www.arpansa.gov.au/news/misinformation-about-australias-5g-network</a></li> </ul>
Small cells bringing fast mobile coverage to where it's needed most	<ul style="list-style-type: none"> <li><a href="https://exchange.telstra.com.au/small-cells-bringing-fast-mobile-coverage-needed/">https://exchange.telstra.com.au/small-cells-bringing-fast-mobile-coverage-needed/</a></li> </ul>
Australian Communications and Media Authority (ACMA) - small cells	<ul style="list-style-type: none"> <li><a href="https://www.acma.gov.au/Home/theACMA/a-guide-to-small-cells">https://www.acma.gov.au/Home/theACMA/a-guide-to-small-cells</a></li> </ul>
EMF Explained – how 5G works	<ul style="list-style-type: none"> <li><a href="http://www.emfexplained.info/?ID=25916">http://www.emfexplained.info/?ID=25916</a></li> </ul>
World Health Organisation online (WHO) – EME Q&A	<ul style="list-style-type: none"> <li><a href="https://www.who.int/features/qa/30/en/">https://www.who.int/features/qa/30/en/</a></li> </ul>
International Commission for Non-Ionising Radiation Protection (ICNIRP)	<ul style="list-style-type: none"> <li><a href="https://www.icnirp.org/en/frequencies/high-frequency/index.html">https://www.icnirp.org/en/frequencies/high-frequency/index.html</a></li> </ul>
Science Media Centre – EME Briefing	<ul style="list-style-type: none"> <li><a href="https://www.scimex.org/newsfeed/background-briefing-5g-jitters-how-safe-is-5g-for-our-health">https://www.scimex.org/newsfeed/background-briefing-5g-jitters-how-safe-is-5g-for-our-health</a></li> </ul>
Science & Wireless 2018 EME presentation	<ul style="list-style-type: none"> <li><a href="https://acebr.uow.edu.au/events/UOW254614">https://acebr.uow.edu.au/events/UOW254614</a></li> </ul>
ACMA RadComms 2018 5G and EME	<ul style="list-style-type: none"> <li><a href="https://www.acma.gov.au/-/media/mediacomms/Events/RadComms2018/Presentations/RadComms-2018-Day-1-Mike-wood-pptx.pptx">https://www.acma.gov.au/-/media/mediacomms/Events/RadComms2018/Presentations/RadComms-2018-Day-1-Mike-wood-pptx.pptx</a></li> </ul>

**From:** stevehart  
**Sent:** Fri, 5 Jun 2020 18:58:09 +0930  
**To:** Plan  
**Cc:** Nick.Champion.MP@aph.gov.au  
**Subject:** Re: Statement of Representation for Development application 292/1594/2019  
**Importance:** Normal

To whom it may concern,

We have previously sent you the attached documentation and would like to advise we continue to oppose the tower even with the additional distance suggested in this updated application.

All of our reasons are still valid as per the attached, and more importantly, whilst it is within a residential area, it is still not acceptable and who knows how much bigger this will eventually get once initial approval is granted (should it be).

Please advise when this will go to a council meeting as we would like to be present.

regards  
Pauline & Steve Hart  
41 Birmingham Drive  
Craigmore SA 5114

ph 0409 285 820

**From:** stevehart  
**Sent:** Wednesday, December 11, 2019 9:03 PM  
**To:** plan@playford.sa.gov.au  
**Cc:** Nick.Champion.MP@aph.gov.au  
**Subject:** Statement of Representation for Development application 292/1594/2019

To whom it may concern,

Attached is our written documentation opposing the development application.

There is also another attachment with our reasons and supporting photos.

Could you please advise us when and where this application will be discussed and voted on during a council meeting as we would like to attend to represent ourselves in person.

regards

Pauline & Steve Hart  
41 Birmingham Drive

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation: Bradley and Renée Possingham  
Postal address: 35 Birmingham Drive, Craigmare

Contact telephone No. 0419 853 863

Nature of Interest / Affected by Development Adjoining resident  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

- Reasons for representation (please attach additional sheet(s) if required)
- High visual impact
  - Impact native wildlife in the area
  - Too close to existing housing
  - Raises health concerns for local residents
  - Decrease market value of our properties

I support the proposal

I do not support the proposal

My representation would be overcome by: State action sought  
(state action sought) (please attach additional sheet(s) if required)

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: Planning Solutions (SA) Pty Ltd

Signed: BR Perringham

Date: 3/6/20

BR Perringham

Bradley and Renee Possingham  
35 Birmingham Drive  
CRAIGMORE SA 5114  
Email: renpos79@hotmail.com

3 June, 2020

Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Dear Sir / Madam,

Please find enclosed our 'Written Representation' in regards to **Development Application Number: 292/1594/2019 (Non-Complying) for the construction of a telecommunications facility and associated fencing located at 286 Craigmores Road, ULEYBURY SA 5114.**

It should be noted that we wish to be heard personally when this development is presented to Council's CAP for consideration, and that a representative from Planning Solutions (SA) Pty Ltd will attend the meeting to address the Panel on our behalf.

The contact details for Planning Solutions (SA) Pty Ltd are as follows:

Mr Trevor White

Phone: 08 8523 3890

Email: [trevor@planningsolutionssa.com.au](mailto:trevor@planningsolutionssa.com.au)

Yours sincerely,



Bradley and Renee Possingham

Bradley and Renee Possingham  
35 Birmingham Drive  
CRAIGMORE SA 5114  
Phone: 0419 853 863  
Email: renpos79@hotmail.com

3 June, 2020

Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

**Re: Development Application Number: 292/1594/2019 (Non-Complying) for the construction of a telecommunications facility and associated fencing located at 286 Craigmere Road in the area known as Craigmere.**

Dear Sir / Madam,

We are the owners of a property located at 35 Birmingham Drive in Craigmere, where the location of the development is located within close proximity to our rear boundary. While the Applicant has provided amended plans moving the telecommunications facility a further 50 metres east on the subject site, we still strongly oppose the proposed construction of a telecommunications facility located at 286 Craigmere Road, Uleybury SA 5114. We request that the members of CAP refuse the application regarding this proposed development, and request the Applicant find an alternative site for the following reasons.

**Nature of Proposed Development:**

The 'subject land' of the proposed development is located within the Hills Face Zone of the Playford Council Development Plan (21 April 2016 – consolidation) where all development, except where located within the Watershed Policy Area 2, is a non-complying form of development.

Reference to the Desired Character for the Hills Face Zone, which is focused on ensuring that development within the zone not only preserves but also enhances the natural character of the zone or in the re-establishment of the natural character. A 30 metre high monopole tower can hardly be argued to be enhancing or re-establishing the natural character of the zone.

**Visual Impact:**

Reference has also been made to the policy provisions within the Zone with reference to the following PDC.

**PDC 23** *Communication towers and masts should be sited and designed to minimise their visual impact. The number of masts should be contained by shared use of facilities.*

Council's Development Plan has regard to telecommunication towers in the Hills Face Zone through PDC 23 by referencing siting of the tower, minimising their visual impact and limiting the number of masts or towers through co-existing with other telecommunication providers.

The applicant states that the proposed tower will "be located and designed to minimise impact on the amenity and the surrounding area" (page 11) and claims that "the proposal does not unreasonably impact upon the locality" (page 5). We argue that the construction of a 30 metre high telecommunications monopole will have a significant impact on the local environment and residents of both Birmingham Drive and Manchester Circuit, Craigmore. The semi-rural location was the main reason we purchased our property back in 2014. We remember viewing our property for the first time and admiring the natural environment that was both to the side and rear of the house.

The real estate agent stressed to us that these rural properties were never to be developed, yet we are now being presented with a proposal to develop this site. We never would have purchased this property had we known that a telecommunications facility was to be built on the adjoining property in the future.

It does not matter how you try and sugar coat the argument that the tower will not unreasonably impact on the locality as the proposed tower is located extremely close to dwellings (sensitive receptors), you cannot hide it and the fact remains it is an intrusion on the amenity of the locality and has an impact on the adjoining residential properties.

**PDC 2** *Development listed as non-complying is generally inappropriate.*

This proposal is located in the Hills Face Zone where the construction of a telecommunications tower is a non-complying form of development, where PDC 2 which reinforces our view that the development is inappropriate for the location and therefore should not be supported.

Reference has also been made to PDC 1 of the Hills Face Zone, which states the following:

**PDC 1** *Development should not be undertaken unless it is associated with a low intensity agricultural activity, a public open space area or a private use of an open character, or is a detached single storey dwelling, including outbuildings and structures normally associated with such dwellings, on a single allotment.*

The proposal fails to satisfy any of the envisage uses in PDC 1, where the primary focus is low intensity agricultural activities and single storey detached dwellings on single allotments.

**Native Vegetation and Wildlife:**

The proposal also states that "the allotment is very well vegetated, creating a strong screening for the facility on the property" (page 11). We strongly disagree with this statement. If you look at the aerial view of the property that was provided by Visionstream on page 11, there are in fact a small number of trees and vegetation surrounding the proposed location for the telecommunications facility.

The vegetation is sparse in this area when compared with the vegetation closer to the owner's house. Yes, there are some trees, but they will not create "a strong screening" for a 30 metre high monopole. A monopole of this size will not be screened by a few trees that are 15 metres or less, and will have a significant visual impact on our properties.

It should also be noted that the proposed development will be set on the top of a hill / rise, which will be very visible as people drive up Craigmores Road and will take away from the surrounding rural setting. This is indicated in Figure 5 on page 13 of Visionstream's proposal. We would argue that a telecommunications facility of that size does not, in any way, enhance the natural character of the native landscape. It will ruin the natural beauty of the surrounding area and will, therefore, have a high visual impact on residents in the immediate locality.

In the 5 years that we have lived on our property we have observed an abundance of native wildlife surrounding the proposed site including reptiles, different species of birds, kangaroos and even the occasional koala. All of which, we feel, will be impacted on if this telecommunications facility is approved. While Visionstream claim they will not be clearing any vegetation to build the facility, it is not known what effect the noise and radiofrequency fields will have on the local native wildlife.

**Interface between Land Uses:**

Another reason we strongly oppose the development proposal is the fact that it will be in close proximity to our houses. In their proposal, Visionstream state that the facility will be "well separated from established residential properties" (page 16) yet indicate that the site will be "situated approx. 30 metres to the east of the residential zone" (page 11). While Visionstream have since amended plans and will be moving the telecommunications facility a further 50 metres east on the subject site, it still cannot be argued that 80 metres is a long distance from residential properties.

It will, in fact, still be within close proximity to properties. This not only creates a visual impact but also raises health concerns for local residents. Facilities, such as the one proposed, have not been around long enough for telecommunication companies to question the validity of health concerns. It was not that long ago that asbestos and tobacco were deemed safe, yet we now know they are far from safe for our health.

Visionstream and Telstra may argue that "all expert reviews on the health effects of exposure to radiofrequency fields have concluded that no adverse health effects have been established to radiofrequency fields" (page 17). However, they cannot guarantee telecommunication facilities will not have an adverse effect on people's health long term. They simply have not been around long enough. We put this question to you. Would you honestly choose to live within metres of a telecommunications facility? Probably not.

Reference has also been made to the General Modules contained in Council's Development Plan, with reference to the 'Interface between Land Uses' Module, which states the following:

**Objective 1** *Development located and designed to minimise adverse impact and conflict between land uses.*

**Objective 2** *Protect community health and amenity from adverse impacts of development.*

**Objective 3** *Protect desired land uses from the encroachment of incompatible development.*

The proposed development is located within 80 metres from residential properties and therefore will have an impact on occupants of the residential properties, through visual impact, possible health issues and failing to protect the existing natural environment from encroachment from incompatible development. Previously in this communication it was indicated that non-complying forms of development were inappropriate for the Zone, hence the proposed development fails to satisfy the three primary objectives listed above.

### **Property Valuation:**

It is always argued by the developers that property devaluation is not a planning issue and should not be taken into consideration when assessing the development proposal, however in reality developments such a telecommunication tower do have an impact on the future sale of residential properties in close proximity to such facilities.

We have been in contact with several local real estate agents who have stated that a telecommunications monopole will decrease the value of all properties in the street as there will be less people prepared to live near this type of structure, less interest at the time of sale which leads to the devaluation of our property value. This issue does not just impact on us but also impacts on a number of other properties in the immediate locality of the tower.

### **Conclusion:**

In conclusion, we strongly oppose the proposed construction of a telecommunications facility located at 286 Craigmole Road, Uleybury. We request that Council's CAP refuse the application regarding this proposed development on the grounds that it will have a high visual impact on surrounding residents, will impact native wildlife in the area, is too close to existing housing, raises health concerns for local residents, and decrease the market value of our properties. For these reasons, we request that the Applicant find an alternative site for this development.

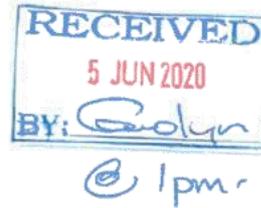
It should be noted that we wish to be heard personally when this development is presented to Council's CAP for consideration, and that a representative from Planning Solutions (SA) Pty Ltd will attend the meeting to address the Panel on our behalf.

Yours sincerely,

Bradley and Renee Possingham

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION  
Pursuant to Section 38 of the Development Act, 1993



Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:  
Postal address:

DENIS ROSEMARY O'BRIEN  
37 BIRMINGHAM DRIVE  
CRAIGMORE SA 5114  
0413021140

Contact telephone No.

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

ADJOINING RESIDENT

Reasons for representation (please attach  
additional sheet(s) if required)

OBJECTION TO VISIONSTREAM  
DEVELOPMENT PROPOSAL FOR TELECOMMUNICATION TOWER.  
NEW SIGHTING/LOCATION DOES NOT CHANGE ANY OF OUR CONCERNS  
- SEE PREVIOUS LETTER OF OBJECTION -

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

RELOCATION OF TOWER  
TO NON RESIDENT LOCATION

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed:



Date:

4/6/20

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

Postal address:

Mark & June Holland  
39, Birmingham Drive  
Craigmore 5114

Contact telephone No.

0413114065 (mark)  
0401 255 261 (June)

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

adjoining resident/property

Reasons for representation (please attach  
additional sheet(s) if required)

We oppose the  
construction of telecommunication tower.  
on Craigmore Road.

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed:

*A Holland*  
*ref*

Date: 5-6-2020

**To the CEO of Playford Council,**

**Please refer to the letter attached with our concerns we outlined in our letter dated 12-12-2019. These concerns are still very relevant for us and our neighbours, The only change is that you have moved the proposed tower 50 metres away from the original site. Not very far at all really !!! You as the council admitted you had a very strong public response against the original application so we feel 50 metres is still inadequate. We feel it will still be visible from our home, will still be on the hills face zone and will still devalue our home. We don't understand why you cannot put this tower further away from residential areas.**

**A petition is unable to be carried out at this time due to the current Covid situation but I am confident we would still have had a very strong response against your new proposal.**

**We would appreciate you contacting us when the next council meeting is so that we can attend and voice our concerns.**

**Regards**

**Mark & June Holland**

Handwritten signatures of Mark and June Holland. The signature on the left is 'M.J.' and the signature on the right is 'Holland'.

Category 3 development application 292/1594/2019  
to construct a telecommunication tower at  
286, Craigmores Road, Uleybury.

To the CEO of Playford City Council

I am writing to voice my concerns about the category 3 development application 292/1594/2019 to construct a telecommunication tower at 286 Craigmere Road, Uleybury.

When we purchased our property we were strongly told that there would be no future development behind us as it is a hills faced zone. The proposed tower is 20 meters from my back fence which is an eye sore to an area that has nature, trees, birds and hill face to admire. This would greatly impede the view from our home and neighbouring properties. Who wants to swap that for a 30 metre invasive tower.

We feel that this tower could potentially devalue ours and our neighbours properties and also make the sale more difficult and a longer process to finalise. The properties on Birmingham Drive and Manchester circuit are all well maintained and property sales are in high demand.

We believe the farm land behind us was refused permission to sub-divide and also several homes were severely flooded due to lack of correct drainage, but now you are considering building a 30 metre tower on this land. You have previously rejected several inadequately drained sites so WHY accept this one after previous flooding issues. This is on your application site Hills Face Zone It is acknowledged that the development will have elements of visual impacts within this zone, adding to the fact it is not envisaged development within the Hills face zone, being non-complying, as stated in PDC 2. However, the proposed location of the facility has been chosen due to a number of reasons to minimise any impacts to the zone, locality and residents. The site is located as far away from residents as possible, while still meeting the coverage needs of the area. In terms, of screening the facility, the existing vegetation that existing on the allotment surrounds the proposed site protecting the view of the equipment shelter and bottom of the tower. The proposed site has vegetation that incorporates existing screening to comply with PDC 3 (a). Although being, a non complying development, the proposed facility is required infrastructure that meets the needs of the community in the Hill Face zones. Has this location been chosen due to the fact that Mr & Mrs Lombardo are the only ones in the area willing to accept your proposal at the resident expense!!!

You say that there are no health risks but that was also said about asbestos, roundup and Johnson baby products. These are only a few products that years later have come to the publics attention It may not be me that suffers but it may be my future family members that suffer health issues. Go online there are plenty of reviews that say there are health risks to vegetation, animals and humans. If you have proven evidence from an independent body that there are no health risks is this available for the public to view as we would be very interested in seeing this evidence.

We strongly oppose the construction of this tower for the above reasons. What next for the residents of surrounding areas more Telecommunication towers from Optus or permission to sub divide this land.

We are not opposed to future technology we are against this tower being so close to our homes. Would you want this in your back garden!!

Regards

Mark & June Holland



**From:** andy7373@tpg.com.au  
**Sent:** Thu, 4 Jun 2020 23:09:37 +0930 (Cen. Australia Standard Time)  
**To:** Plan  
**Subject:** Statement Of Representation for Development Application 292/1594/2019  
**Attachments:** Letter page 01.pdf, Letter page 02.pdf, Statement Of Representation page 01.pdf, Statement Of Representation page 02.pdf

To the CEO of the Playford City Council.  
Attached is the statement of representation to the opposal of the Development Application 292/1594/2019 - construction of a telecommunications facility.  
Regards,  
Andrew Odzierejko  
18 Manchester Circuit Craigmore, 5114  
M: 0425353772



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To the CEO of City Of Playford Council.

I am writing to you today to voice my concerns about the Category 3 development application 292/1594/2019, construction of a telecommunications facility at 286 Craigmore Road Uleybury. As my understanding is, the area is still zoned as a Hills-face zone. This is one of the reasons for purchasing the land and establishing a home there for the outlook from the backyard and surrounding area of farmland and the natural outlook of the area. This view will be compromised and the natural look of the land will be changed with a massive 31.4 metre tower to be constructed towering over current vegetation and trees currently establishing the area. As the owners realised due to this zoning restriction council did not permit the building of a structure over 1 meter high in the area due to a nature set-back so land owners were forced to build sheds and other structures 10 metres off the fence line due to the hills face zoning. But now council seeks residential approval for a similar issue regarding a 31 meter tower in the same area by a billion \$\$\$ company. If this approval is accepted then what next? Subdivision of the hills face area? More mobile towers when OPTUS or another Telecommunications company wants to expand their 5G network. I do not have an issue with the technology just with it in such close proximity to housing in the area for various reasons.

The distance of 78 metres to the closest neighbouring buildings fence lines is not an adequate distance away for many reasons as I will discuss further. This Telecommunications tower will not only impede views from homes in the area but will also de-value property prices of homes directly affected by the towers close proximity to adjacent and near-by properties. There is a stigma around 5G Telecommunication towers causing serious health risks from the Radio Frequency Radiation it produces on a 24 hr/ 7 days a week, 365 day a year timeframe. These levels of radiation from the higher frequency milli-wave forms produced by the 5G towers maybe classed as acceptable in low doses ( ie. Walking past it won't kill you) but under the conditions it's designed for and the location that's proposed is highly disputed as being a possible carcinogenic causing serious health concerns.

Many studies have associated low-level Radio Frequency Radiation exposure with a litany of health effects, including:

- DNA single and double-strand breaks (which leads to cancer)
- oxidative damage (which leads to tissue deterioration and premature ageing)
- disruption of cell metabolism
- increased blood-brain barrier permeability
- melatonin reduction (leading to insomnia and increasing cancer risks)
- disruption of brain glucose metabolism
- generation of stress proteins (leading to myriad diseases)

As mentioned, the new 5G technology utilizes higher-frequency MMW bands, which give off the same dose of radiation as airport scanners. The effects of this radiation on public health

have yet to undergo the rigours of long-term testing. Adoption of 5G will mean more signals carrying more energy through the high-frequency spectrum, with more transmitters located closer to people's homes and workplaces—basically a lot more (and more potent) RFR flying around us. Remember when cigarette smoking was deemed healthy ??? When asbestos was used without the public knowing full well of it's deadly properties ??? It took time for these deadly findings to be publicly released even though the manufacturers already knew what diseases could be caused by their products.

I plan to live in this area for probably most of my remaining years which I hope is a good 25± years without the threat of one day waking up to news of health conditions caused by long term exposure to RFR. I'm sure there are more adequate areas further up the hill and around the corner of Craigmore Road that would suit this development better for all concerned.

So I ask council one simple question would you want a telecommunications tower in your backyard ???

Regards,

Andrew Odzierenko.

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation: ANDREW ODZIEREJKO, SANDRA SCHWERD  
Postal address: 18 MANCHESTER CIRCUIT CRAIGMORE

Contact telephone No. 0425353772

Nature of Interest / Affected by Development OWNER OF LAND IN VICINITY  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Reasons for representation (please attach additional sheet(s) if required) SEE ATTACHED LETTER  
THE ADDITIONAL 50 METRES IS STILL NOT  
AN ADEQUATE DISTANCE AS STATED  
PREVIOUSLY.

I support the proposal  I do not support the proposal

My representation would be overcome by: SEE ATTACHED LETTER  
(state action sought) (please attach additional sheet(s) if required)

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: ANDREW ODZIERETKO

Signed: *A Odzieretko*

Date: 1/6/20

**From:** [Claire Sutton](#)  
**To:** [Plan](#)  
**Subject:** [SUSPICIOUS] Fwd: Statement of Representation for Development Application 292/1594/2019  
**Date:** Thursday, 4 June 2020 4:34:44 PM

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**This Message originated outside your organization and/or sent from a freemail service.**

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To whom it may concern, please find below our updated statement of representation based on the amended proposal. Also below that, refer to the previous representation from December which covers the same concerns with the updated plan.

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

**Name of person(s) making representation:** Claire Sutton & Carl Burridge

**Postal Address:** 22 Manchester Circuit, Craigmore SA 5114

**Contact telephone No.** 0406 763 929

**Nature of Interest / Affected by Development (eg adjoining resident, owner of land in vicinity, or on behalf of an organisation or company):** Owner of land in vicinity

**Reasons for representation:**

A 30m comms tower is not suitable to be positioned so close to residential properties, with clear visibility of the tower from the street. The value of properties in the vicinity and the saleability of them will be significantly negatively impacted.

Moving the 30m tower 50m further east will make no difference to the reasons of our objection. This would actually mean it would be higher up the hill, so the visibility from the street would be largely unchanged, if at all.

Note: I also want to make note that the photo in the application (Figure 6. Indicative view...) is not a true representation of what the tower would look like from the street. It was taken from a low angle, and very conveniently behind the only tall trees in the street. The impact of the tower from the street would actually be much more prominent than what has been indicated.

I do not support this proposal.

**My representation would be overcome by:**

The location being in a more suitable place - further away from residential properties. Like other comms towers I have seen, these are positioned in parks/ovals/commercial areas, not on a beautiful residential street.

---

I DESIRE TO BE HEARD PERSONALLY (Y)

---

Signed: Claire Sutton  
04/06/2020

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION

Pursuant to Section 38 of the Development Act, 1993

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

Mark and Annette Timpano

Postal address:

45 Birmingham Drive Craigmore  
5114

Contact telephone No.

0431 087 045

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Adjoining Resident.

Reasons for representation (please attach  
additional sheet(s) if required)

Proposed amended site will  
still be visible from our property + from all surrounds  
- notably on the HILLS FACE BOUNDARY!! - Our property  
value + resale potential will be severely impacted by the  
visible presence of the proposed tower.

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

Moving tower location  
to the other side of  
Craigmore Road

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed:



Date:

2/6/20

DEVELOPMENT ACT, 1993

STATEMENT OF REPRESENTATION  
Pursuant to Section 38 of the Development Act, 1993

RECEIVED

4 JUN 2020

BY: *Gaylyn*

@ 2:30pm.

Development Application No: 292/1594/2019

To: Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113

Name of Person(s) making representation:

*Salvatore Papalia*

Postal address:

*13 Union Rd Uleybury 5114*

Contact telephone No.

*0911016111*

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

*Owner of land in vicinity*

Reasons for representation (please attach  
additional sheet(s) if required)

*Health concerns*

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

---

Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative, unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: \_\_\_\_\_

Signed:

Date:



**DEVELOPMENT ACT, 1993**

**STATEMENT OF REPRESENTATION**

Pursuant to Section 38 of the Development Act, 1993

Development Application No: **292/1594/2019**

To: **Chief Executive Officer  
City of Playford  
12 Bishopstone Road  
DAVOREN PARK SA 5113**

Name of Person(s) making representation:

Colin Cameron

Postal address:

9 Birmingham Dr.  
Craigmore SA 5114

Contact telephone No.

08 8284 5698

Nature of Interest / Affected by Development  
(eg adjoining resident, owner of land in vicinity,  
or on behalf of an organisation or company)

Owner of land in vicinity

Reasons for representation (please attach  
additional sheet(s) if required)

Unpleasantly impact on  
community and inevitable depreciation of  
property value

I support the proposal

I do not support the proposal

My representation would be overcome by:  
(state action sought) (please attach additional  
sheet(s) if required)

Rejection of Proposal

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Please indicate in the appropriate box below whether or not you wish to be heard by Council in respect to this submission:

I DO NOT WISH TO BE HEARD

I DESIRE TO BE HEARD PERSONALLY

(if more than one person is making the representation, the first named person will be taken to be the representative,

unless otherwise specified in this form)

I WILL BE REPRESENTED BY:

Name: Colin Cameron

Signed:

*Colin Cameron*

Date:

*31/5/2020*