



20th August 2025

City of Greater Geraldton
63 Cathedral Avenue
Geraldton WA 6530
council@cgg.wa.gov.au

Dear Sir/Madam,

Amplitel Limited – Proposed Mobile Phone Base Station

RFNSA Site No: 6530028 Site Name: Mahomet Flats

Site Address: Lot 26 Durlacher Street Mount Tarcoola WA 6530

Service Stream acts on behalf of Amplitel, who are the owners and managers of the infrastructure component of Telstra Corporation Limited (Telstra) with respect to the deployment of its mobile phone network.

Service Stream has prepared the following submission in support of an Application for Approval for Development of a telecommunications facility to form part of the Telstra mobile telephone network in Western Australia.

The proposal is not a Low Impact Facility under the provisions of the Telecommunications (Low-Impact Facilities) Determination 2018. Therefore, the proponent is required to apply for and receive Approval for Development under State Planning laws.

The site selection and design process undertaken by Telstra aims to achieve the required network solutions and necessary coverage, and incorporates the following considerations:

- Radio coverage objectives.
- Low-impact and co-location opportunities.
- Surrounding land uses.
- Planning, environmental and heritage considerations.
- Design and construction constraints.



The proposed facility involves the installation of a 25m telecommunications monopole, tennas, equipment shelter, ancillary equipment and fencing. The tower will cater for current and proposed antennas and future reservations. Specifically, it is proposed to accommodate six (6) new Telstra panel antennas mounted on a triangular headframe.

The location has been deemed to be the most appropriate solution to facilitate Telstra's mobile network to service the locality.



PLANNING REPORT

In support of the Development Application for a new Telstra Mobile Phone Base Station at

Lot 26 Durlacher Street Mount Tarcoola WA 6530



Our Reference: MAHOMET FLATS

Prepared by: Service Stream

On behalf of: Amplitel



Document Control				
Rev	Date	Status	Prepared by	Reviewed by
1	20/08/2025	Draft		
2				



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SITE DETAILS

Legal description

Table 1 – Lot details

Lot	Diagram	Volume	Folio
26	74567	1820	977

Refer **Appendix A**, Certificate of Title.

Regional context

The subject site is located within the Midwest region of Western Australia, approximately 400 kilometres north of the Perth CBD and 2km southeast of the Geraldton CBD. The Geraldton Airport is located 7.5km to the east.

Local context

The locality is bound by the John Wilcock link to the north, Highbury Street to the south, Scott Road to the east and Waverly Street to the west. The topography of the locality is best described as having a gentil undulation.

The majority of the locality is characterised by low density residential uses, with mostly single storey dwellings on medium sized allotments. In addition to this there are some non-residential uses such as the water plant on the subject site and the vegetated area and train line east of the subject site.

The subject land is made up of three allotments, 26, 27 and 30. The subject allotment (Lot 26) is bound by Durlacher Street to the west, dwellings fronting Foster Place to the south, and railway land to the north and east.

Lot 26 is 3.71ha in area and developed with water reservoirs and associated buildings and equipment. The land has been heavily modified when constructing the water infrastructure. The site is unevenly vegetated with the most significant groves of vegetation being along the street frontage to the east and at the southern end of the allotment.

The proposed Amplitel / Telstra site is a 10m x 10m compound located in the north-western corner of Lot 26.

Photographs 1 – 3, following pages, show the subject site and surrounding area.

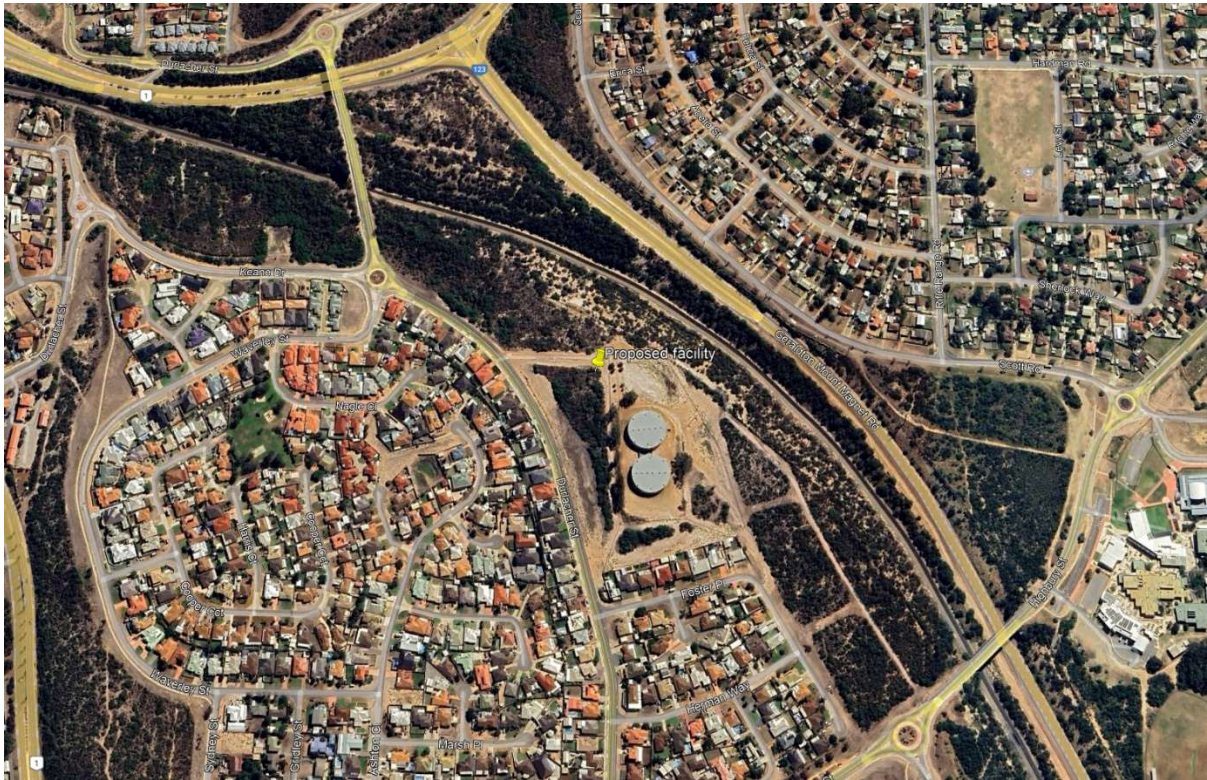


Figure 1: Aerial photograph showing location of the site relative to the greater locality.

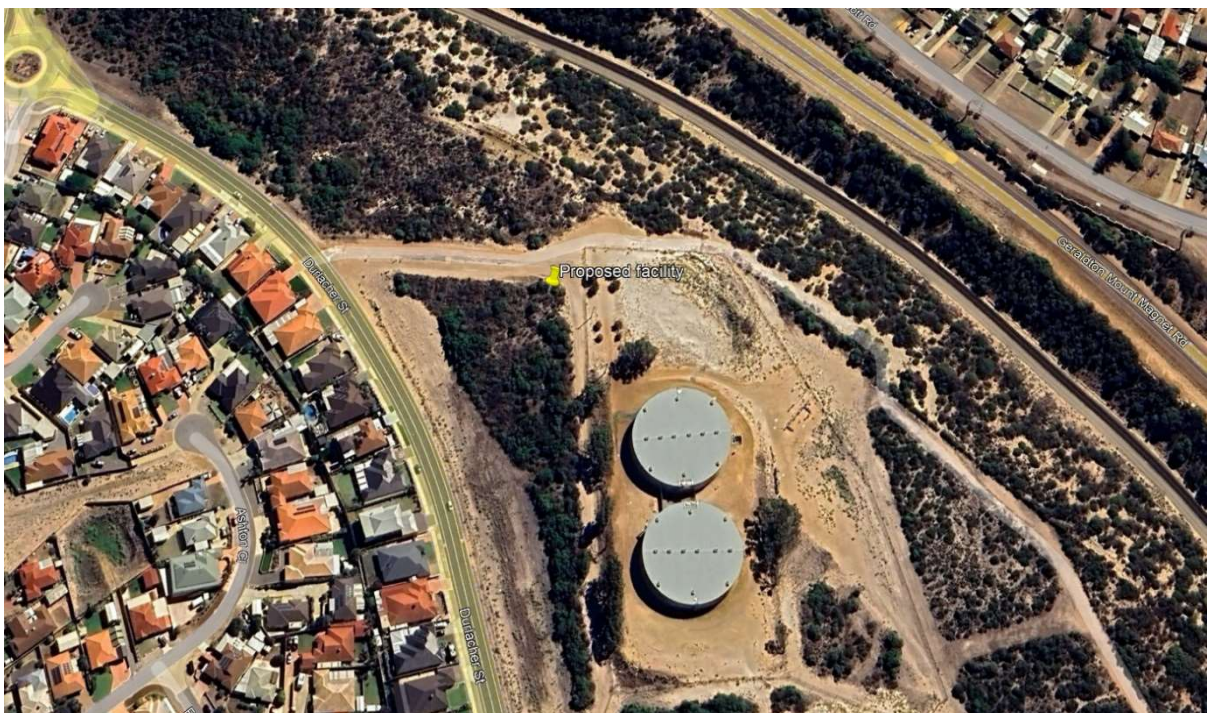


Figure 2: Location of site on allotment 26



Figure 3: View towards the proposed site, looking east from Durlacher Street, near the entrance to the subject land.



ALTERNATE CANDIDATES CONSIDERED

This submission provides assessment in respect of the relevant planning guidelines and demonstrates site selection on the basis of the following:

- The site is appropriately located and sited to minimise visual impact on the immediate and surrounding area;
- The site will achieve the required coverage objectives for the area;
- The proposal operates within the regulatory framework of Commonwealth, State and Local Government;
- The facility operates within all current and relevant standards and is regulated by the Australian Communications and Media Authority.

As Planning for a new telecommunications facility is a complex process, site selection is also based on a number of key issues including:

- Radiofrequency coverage;
- Low-impact and co-location opportunities;
- Availability of suitable sites;
- Planning, environmental and heritage considerations;
- Engineering criteria; and,
- Construction considerations.

A number of alternative sites were examined within the search area with regard to each site's ability to meet the coverage objectives and site considerations listed above. Following extensive scoping, the subject site was selected as it successfully met key objective criteria.

Carriers seek to avoid residential areas and sensitive land uses where it is possible to do so, although this must be weighed against build implications and coverage feasibility provisions. In this case, residential zones have been avoided and the site will be located away from key tourist uses whilst still offering coverage to these areas.

Table 2 lists the considered candidates and the reason the sites were discounted.

Table 2 – Site Selection Candidates	
Site	Opportunities and Constraints
Candidate A Off Durlacher Street WANDINA WA 6530	Candidate A was selected as the prime candidate based on a number of considerations outlined later in this report. The location met coverage objectives, tenure could be secured and it was considered that a facility in this location would not have a significant detrimental effect on the visual amenity of the area. At Council's request, alternative sites on the eastern side of the subject land were considered but not supported by the landowner due to the interference with



	existing underground services and operational requirements i.e. conflict with overflow basin. It was also rejected by Telstra Radio Engineers as the land slopes away and it is further from than the target coverage area, a taller structure would be required to achieve coverage objectives.
Candidate B 40 Hutchinson Street, GERALDTON WA 6530	Outside of the target area would not provide adequate coverage and capacity to it.
Candidate C 271 Durlacher Street, MOUNT TARCOOLA WA 6530	Not pursued due to visual impact concerns
Candidate D Off Brand Highway MAHOMETTS FLATS WA 6530	Council not supportive of this location due to potential visual impact along North West Coastal freeway or Cathedral Avenue.
Candidate E 10 Olive Street, GERALDTON WA 6530	Council not supportive of this location due to potential visual impact along North West Coastal freeway or Cathedral Avenue.
Candidate F 12 Hermitage Street GERALDTON WA 6530	Council not supportive of this location due to potential visual impact along North West Coastal freeway or Cathedral Avenue.
Candidate G 169 Cathedral Avenue GERALDTON WA 6530	Willing Landowner but Council not supportive of this location due to potential visual impact along North West Coastal freeway or Cathedral Avenue.
Candidate H 15 Onslow Street GERALDTON WA 6530	Council not supportive of this location due to potential visual impact along North West Coastal freeway or Cathedral Avenue.
Candidate I 37 Onslow Street GERALDTON WA 6530	Outside of the target area would not provide adequate coverage and capacity to it.
Candidate J 85 Shenton Street GERALDTON WA 6530	Council requested a low point on the property to protect amenity, however the monopole would need to be much taller in order to operate effectively thereby negating the lower ground level position.
Candidate K Off Currell Way, GERALDTON WA 6530	Not supported by Yamatji Southern Regional Corporation due to Aboriginal heritage concerns
Candidate L 34 Onslow Street GERALDTON WA 6530	Could not secure tenure with the landowner
Candidate M 2 Utakarra Road, RANGEWAY 6530	Outside of the target area would not provide adequate coverage and capacity to it.



PROPOSAL

The proposed facility comprises a 25 metre-high monopole with a triangular headframe attached at the top of the monopole. Six panel antennas and associated equipment will be attached to the headframe. A Telstra equipment shelter will be installed within the new compound, adjacent the monopole.

The facility will be contained within a fenced compound area (10 x 10m) and access will be via the existing access track leading into the subject site.

The components of the proposed facility are summarised as follows:

Table 3 – Proposed facility

Component	Quantity	Dimensions per unit	Height (AGL)
Monopole	1	N/A	25.0m
Panel antennas	6	2533mm (L) x 350mm (W) x 208mm (D)	25.0m CL
GPS Antenna	1	100mm (h) x (Ø)72mm	3.1m (base)
Equipment shelter	1	3.0m x 2.38m x 2.97m	Ground level

Detailed plans and elevations depicting the proposal are attached (refer **Appendix B**).

TOWN PLANNING CONSIDERATIONS

City of Greater Geraldton Local Planning Strategy

The Local Planning Strategy sets out the City's strategic vision and land use expectations for development. Relevant parts of the strategy have been assessed.

Part 3.4.5 of the Planning Strategy states the following:

The Strategy recognises the important role of community and public purpose sites in the urban fabric. While many facilities have been developed and some future sites identified, the future urban areas will require identification of land in appropriate locations for community services to support population growth. Intensifying residential development around the activity centres will optimise usability and accessibility to existing community facilities and services. The Strategy recognises the important role of the Health, Education and Training Precinct for the Mid West Region and the need to encourage the development of this precinct for a wide range of ancillary uses associated with health and education uses, including student and workforce accommodation.



The proposed infrastructure will provide mobile phone and wireless data coverage to the locality, complimenting and enhancing current and future residential uses. The facility will also provide essential mobile communications for emergency services, improving health, safety and employment for the region.

The proposal is considered to be consistent with relevant objectives of the Local Planning Strategy.

City of Geraldton Telecommunications Infrastructure LPP (Dec 2015)

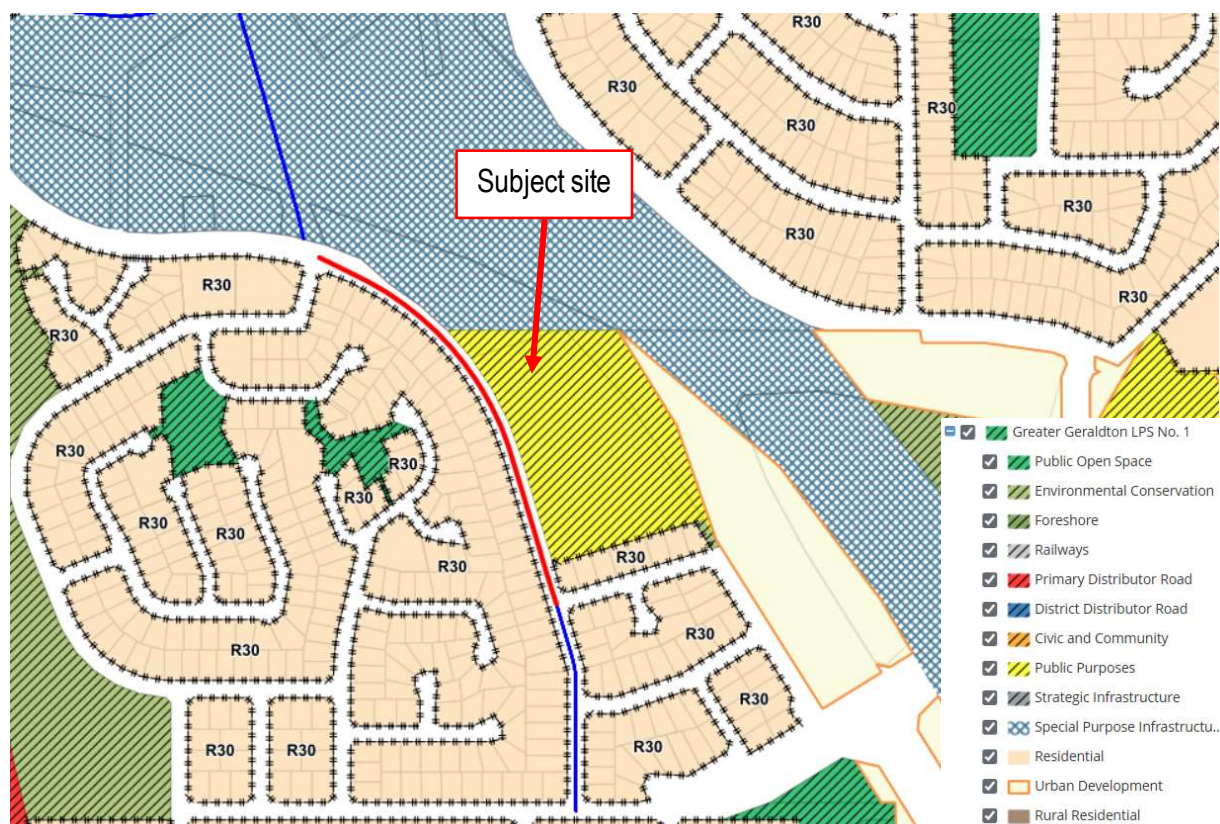
The Telecommunications LPP has been considered, but other than the objective to ensure the facility will not cause interference, it doesn't appear relevant to this type of facility. The policy measures apply to radio / TV communication structures, satellite dishes and whip like aerial in residential areas.

The proposed facility will not cause any interference to any electrical appliances as it operates on frequencies reserved for mobile phone base stations.

City of Greater Geraldton Local Planning Scheme No. 1 (LPS1)

Zoning

The subject site is zoned 'Public Purposes' under the provisions of the Local Planning Scheme No.1 (LPS1). Assessment against relevant provision is provided.





Objective of the Public Purpose Zone

To provide for a range of essential physical and community infrastructure, services and facilities.

Telecommunications facilities are infrastructure that serve the day-to-day operations of residential and commercial uses. The proposed facility is located within the Public Purpose zone, well separated from residential areas, providing the necessary buffer to this sensitive land use. It is considered that the proposed facility will be a well located and essential addition to the zone that will enhance current and future residential and home business activity.

General Development Requirements

Assessment against relevant provisions is provided below:

4.17 Development height

4.17.1 Unless otherwise approved by the local government, no development shall be constructed to exceed the height limits of the Geraldton Airport Obstacle Limitation Surface or this Scheme.

The Geraldton Airport Obstacle Limitation Surface map indicates that the OLS at Lot 26 is 182.7m. Clearance of the OLS is achieved.

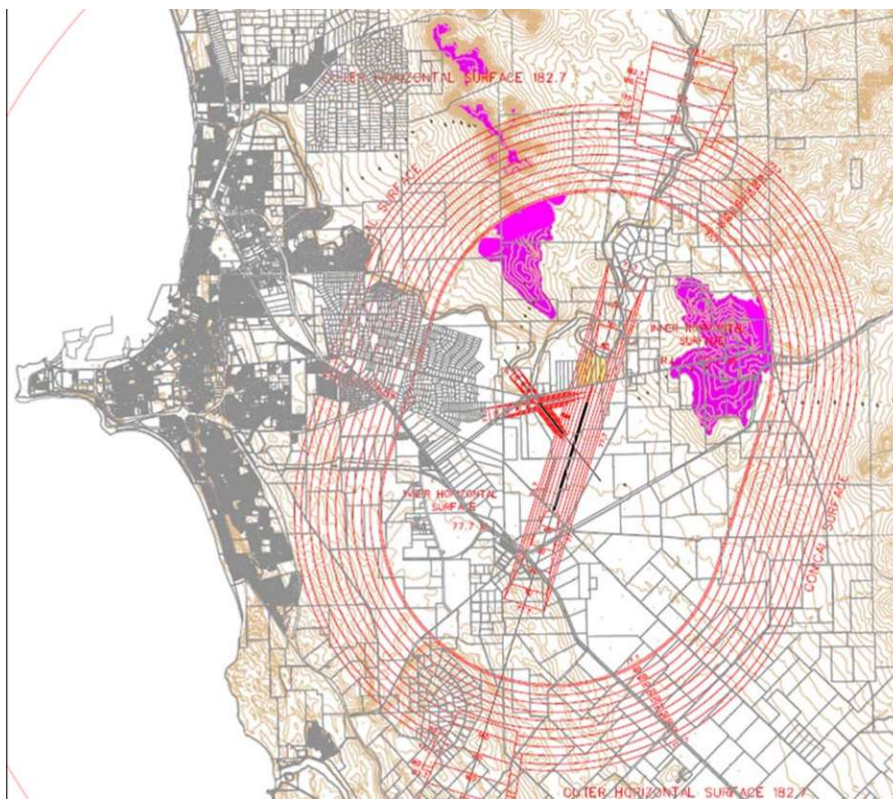


Figure 5: Geraldton OLS map (Source: Geraldton Airport Master Plan 2012-2030)



Clause 4.14 Parking Requirements

Access to the proposed telecommunications facility and compound will be via the existing access track on Durlacher Street. An area adjacent to the proposed compound will be utilised during construction and once operational, standard maintenance vehicles will visit and park adjacent the Telstra compound.

Telecommunications facilities are not staffed and subject to only occasional maintenance. No permanent car parking is required.

Deemed Provisions

Planning and Development (Local Planning Schemes) Regulations 2015

Clause 67 *Matters to be considered by local government of the Planning and Development (Local Planning Schemes) Regulations 2015 (Regulations)* provides:

In considering an application for development approval the local government is to have due regard to the following matters to the extent that, in the opinion of the local government, those matters are relevant to the development the subject of the application —

Orderly and Proper Planning

State, Commission and Local Planning Policy

Environmental Protection

Amenity Protection

Built and cultural heritage

Suitability of the land for the development, and

Traffic generation

State Planning Policy 5.2 – Telecommunications Infrastructure

State Planning Policy No. 5.2 (**SPP 5.2**) seeks to facilitate the development of an effective state-wide telecommunications network in a manner consistent with the economic, environmental, and social objectives and orderly and proper planning. Clause 4 Policy Objectives of SPP5.2 states:

The objectives of this policy are to:

- a) facilitate the provision of telecommunications infrastructure in an efficient and environmentally responsible manner to meet community needs;*
- b) manage the environmental, cultural heritage, visual and social impacts of telecommunications infrastructure;*
- c) ensure that telecommunications infrastructure is included in relevant planning processes as essential infrastructure for business, personal and emergency reasons; and,*



- d) promote a consistent approach in the preparation, assessment and determination of planning decisions for telecommunications infrastructure.*

The following principles, as stated in SPP 5.2 are relevant and responses provided:

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

- ii) Telecommunications facilities should be sited and designed to minimise visual impact and wherever possible; and*
- a) be located where it will not be prominently visible from significant viewing locations such as scenic routes, lookouts and recreation sites;*
 - b) be located to avoid detracting from a significant view of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land;*
 - c) not be located on sites where environmental cultural heritage, social and visual landscape values maybe compromised;...*

To achieve coverage objectives, a 25-metre monopole is required. It is acknowledged that the pole will be a new visible element within the greater locality. However, the monopole design is considered less visually dominant, compared to a lattice tower or guyed mast.

The site itself is well separated from heritage places or landmarks. The closest heritage place is a weather board worker cottage, place number 202, more than 840m north west of the site. No environmental cultural heritage, social and visual landscape values will be compromised by the placement of the facility in this location.

Furthermore, the area is not heavily populated and views from the surrounding roads will be partially obscured by roadside vegetation.

- d) Display design features, including scale, materials, external colours and finishes that are sympathetic to the surrounding landscape.*

The monopole is to be constructed of concrete, a neutral colour, and the equipment shelter is to be of a 'pale eucalypt' finish to compliment natural vegetation in the area.

- iv) Telecommunications infrastructure should be located where it will facilitate continuous network coverage and/or improve telecommunications services to the community;*

The proposed infrastructure will facilitate improved mobile phone and wireless data coverage to the local area and along traffic corridors in the wider area to service the local community.

- v) Telecommunications infrastructure should be co-located...*



Detailed investigations of the locality revealed no other opportunities to co-locate telecommunications infrastructure which would achieve the coverage objectives for this locality.

TELECOMMUNICATIONS LEGISLATION

The installation and operation of telecommunications infrastructure is regulated by the *Telecommunications Act 1997* (Commonwealth), in addition to state planning legislation where applicable.

It is a condition of telecommunications carriers' licences that they must comply with the *Telecommunications Act 1997* and the *Telecommunications Code of Practice 2021*. The Code of Practice further requires carriers to comply with the Communications Alliance Industry Code C564:2020 – Mobile Phone Base Station Deployment (**DC Code**). The DC Code imposes site specific obligations on carriers, including the requirement to have regard to guidelines established within the DC Code to take a Precautionary Approach to site selection and infrastructure design. In accordance with the conditions of its licence, Telstra has, in selection of the subject site and design of the proposed infrastructure, applied the Precautionary Approach mandated by Sections 4.1 and 4.2 of the DC Code.

The proposed infrastructure will operate in compliance with the Australian Communication and Media Authority (**ACMA**) Electromagnetic Emissions (**EME**) regulatory arrangements. A summary report of the predicted Radiofrequency EME Levels for the proposed facility has been assessed. This assessment was undertaken in accordance with the Australian Radiation Protection and Nuclear Safety Agency (**ARPANSA**) prediction methodology and report format. The assessment confirms that the proposed installation operating at full power complies with the *Radiocommunications (Electromagnetic Radiation – Human Exposure) Standard 2003*.

A copy of the EME Report is attached.

PHOTOMONTAGES

A series of photomontages have been generated to demonstrate the visual impact of the proposed facility from nearby sensitive vantage points. These demonstrated that whilst it will be visible, it will not be a dominant feature. Its location, colouration and thin cross section have minimised its visual prominence.

Infrastructure such as telecommunication facilities are utilitarian in nature and are primarily designed and constructed to perform a task. It is for this reason that it relevant planning policy seeks to minimise its visual impact rather than eliminate it. Telecommunications facility design and location are driven by the user base, i.e. where the gap in coverage exists, where is this target area is in relation to the facility and what the topography is between the target area and proposed facility.



As described in the alternate candidate's section of this report, Council were not supportive any proposed locations which could be seen from the north west Freeway or Cathedral Avenue.



Photomontage 1: View from intersection of Durlacher Road and Foster place looking north



Photomontage 2: View from Durlacher Road looking east



Photomontage 3: View from Durlacher Road looking north



Photomontage 4: View from Scott Road looking west

CONCLUSION

The proposal presented is permissible under the provisions of City of Geraldton Local Planning Scheme No 1, is consistent with the objectives and provisions of the applicable statutory planning instruments and is also consistent with the principles of orderly and proper planning as outlined in the preceding sections.

In summary, the proposal is justified for the following reasons:



1. The proposal is consistent with the City of Geraldton Local Planning Strategy 21 October 2015
2. The proposed development is consistent with the Scheme objectives and provisions of the City of Geraldton Local Planning Scheme No 1.
3. The proposal is consistent with the Western Australian Planning Commission's State Planning Policy No. 5.2–Telecommunications Infrastructure.
4. The proposal is adequately separated from sensitive sites and residential development.
5. Works associated with the development are not anticipated to detrimentally affect the amenity of the area.