

1.2. Site details

The subject land is an irregular-shaped allotment with an area of 1.733 hectares located on Petersen Road (Council's property system identified the property address as Craignish Road). The site is formally described as Lot 68 on MCH4841. The parcel of land is State owned, and Council is Trustee pursuant to the Land Act and has authority to consent to secondary use of trust land. A report seeking Trustee lease consent was presented at the Ordinary Council Meeting no. 5/21 on 26 May 2021 (Item No: ORD 10.2.2) and granted subject to the Trustee lease being subject to Telstra obtaining relevant development approvals. The subject site has a slight fall of 5.25m AHD across the site towards the north-east corner, with the proposed telecommunication facility having a ground level of 4.5m AHD.



Figure 7 - Subject Site and proposed Facility Location

The locality around the subject land is mixed, with the site located within the Environmental and Conservation Management Zone, as well as land further north and to the north-east. The adjoining lot to the north is zoned as Open Space. Residential zoning and uses are located to the east, south and west of the subject site. Further residential zoning and uses are located to the north beyond the Open Space Zoned land. The surrounding zoning is shown below.



Figure 8 - Subject Site and Zoning under Fraser Coast Planning Scheme 2014

Refer Attachment 1 – Locality map.

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1.3. Previous approvals

There are no known previous applications or approvals over the site.

2. ASSESSMENT

2.1. Framework for Assessment

Categorising Instruments for Statutory Assessment

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

- the *Planning Regulation 2017*;
- the planning scheme for the local government area;
- any temporary local planning instrument; and
- any variation approval.

Of these, the planning instruments relevant to this application are discussed in this report. It is noted that Council has not adopted any temporary local planning instruments.

2.2. Assessment Benchmarks pertaining to the planning scheme

The applicable planning scheme for the application is the Fraser Coast Planning Scheme 2014 (version 11). The following sections relate to the provisions of the planning scheme.

Planning Scheme:	Fraser Coast Planning Scheme 2014 (version 11)
Strategic Framework Land Use Category:	Urban Area
Local Plan:	Not Applicable
Local Plan precinct:	Not Applicable
Zone:	Environmental Management and Conservation Zone
Zone Precinct:	Not Applicable
Overlays:	OM-001-ASS-Area 1-Land at or below 5mAHD OM-001-ASS-Area 2-Land above 5m & below 20mAHD OM-004(B)-MSES Reg Veg-Essential Habitat OM-004(B)-MSES Reg Veg-Wetland with 100m buffer OM-004(B)-MSES Wildlife Habitat OM-004(B)-Other remnant vegetation OM-004(W)-Local wetland OM-004(W)-Local wetland buffer OM-004(W)-MSES High ecological significance wetland OM-005-Bushfire hazard potential impact buffer OM-005-Bushfire prone area OM-005-High bushfire hazard area OM-005-Medium bushfire hazard area OM-006-Medium hazard storm tide OM-008-Flood hazard area
Assessment Benchmarks:	<ul style="list-style-type: none"> • Strategic Framework • Telecommunications Facility Code • Landscaping Code • Transport and Parking Code • Works, Services and Infrastructure Code

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	<ul style="list-style-type: none"> • Acid Sulfate Soils Overlay Code • Biodiversity Areas, Waterways and Wetlands Overlay Code • Bushfire Hazard Overlay Code • Coastal Protection Overlay Code • Flood Hazard Overlay Code • Environmental Management and Conservation Zone Code
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2.2.1 Strategic Framework

Settlement pattern theme

Element 6 (Incompatible land uses) of the Settlement Patten Theme outlines that *'appropriate buffering and separation between incompatible land uses is provided to avoid or minimise land use conflicts and to protect the health, wellbeing, amenity and safety of the community.*

In particular, the specific outcomes seek that:

- a. The interface between land uses is effectively managed to:-
 - i. protect sensitive uses from incompatible land uses; and
 - ii. maintain the long-term viability of existing land uses from encroachment by incompatible uses.
- b. New land uses which are incompatible with existing sensitive uses are located and managed to protect the health, wellbeing, amenity and safety of the community from the potential adverse impacts of air, noise and odour emissions and hazardous materials.

The proposed facility has minimised its impact on adjoining land uses, which are Council reserve to the north, with the monopole being set well away and screened by the existing dense vegetation from the residential uses to the east and south.

Notwithstanding separation distances, the facility meets the maximum cumulative EME level, being 0.74% of the public exposure limit. The submitted material therefore demonstrates that the social wellbeing and safety outcomes sought by the Strategic Framework can be met.

Infrastructure and services theme

Element 3 (Energy and telecommunication infrastructure) of the Infrastructure and Services Theme confirms the planning scheme seeks to ensure the region is well-served by essential telecommunication infrastructure. Access to efficient, modern and high-quality telecommunications and information technology is to be provided to help connect the dispersed communities of the Fraser Coast and provide access for the region to State, National and Global economies.

The provision of high-speed internet and telecommunications is to be facilitated. Energy and telecommunication infrastructure is:-

- located and designed to ensure its safe operation;
- integrated in a manner which does not unduly impact on the landscape qualities of the area; and
- co-located wherever possible.

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The proposed facility will provide new and improved Telstra mobile and data coverage to the Craignish and Toogoom area to ensure residents and businesses to have access to the latest 4GX and 5G services. Furthermore, the proposed facility will offer other mobile carriers an opportunity to collocate their equipment at the site, which will benefit the whole community not just Telstra customers and will help limit the number of telecommunications infrastructure sites required to service the area.

The figure below was provided by the applicant and shows the location of the proposed facility and all nearby existing facilities:

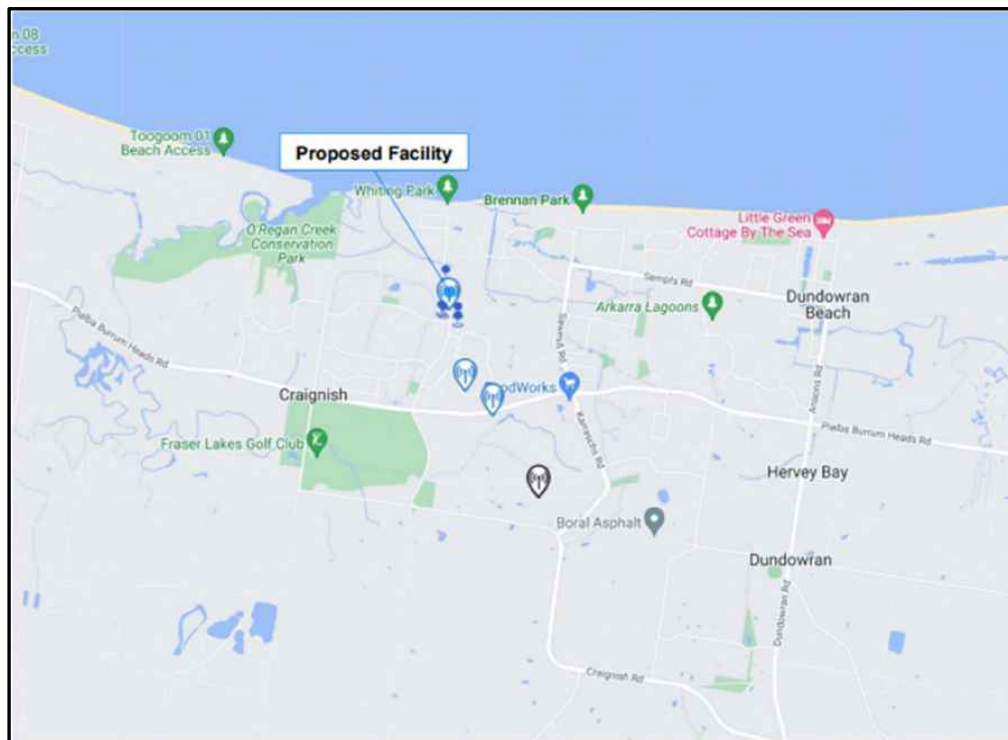


Figure 9 - Existing Telecommunication Facilities (carrier sites) up to 4km from the proposed site

The applicant has provided the following reasons why co-location was discounted on the existing telecommunication facilities;

- **79 Straits Lookout, Craignish (existing water tank – 694m south)** – While appearing in the RFNSA database, Optus did not progress to build due to community objection. In addition, the water tank was insufficient in height to achieve Telstra’s coverage objectives.
- **789 Pialba – Burrum Heads Road, Craignish (964m south – east)** – While appearing in the RFNSA database, this Optus site did not progress to build.
- **366 Craignish Road, Craignish (existing Amplitel 30m monopole – 1.75km south – east)** – Telstra already has a presence at this site, upgrading this site was not considered as it was located too far away and too small to achieve the specific coverage objectives required to service the targeted area.

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As such, the applicant advises there is no opportunities for co-location to solve the issue identified and a new structure is required to achieve the improvements sought to Telstra coverage in the area. Once the proposed structure is in place, it will also be suitable and available for others to co-located.

The proposed facility advances the intent of the Strategic Framework provisions

2.2.2 Telecommunications Facility Code

Impacts to sensitive land uses

Performance Outcome 1 of the Telecommunications Facility Code states the development is to be located on a site which minimises any adverse impacts on sensitive land uses, the amenity of the local area and community wellbeing, and is sited in a manner compatible with land uses adjacent to and in the general vicinity of the development site.

In this instance, the proposed facility is located within the Environmental Management and Conservation Zone and has sited the monopole in particular to reduce the integrity of the existing environmental values of the site and area. The proposed monopole has been situated below the prominent ridgeline to the south, to ensure the monopole is not prominently visible from nearby residential properties and will be screened by existing vegetation when viewed from residential properties immediately adjoining the site. The proposed monopole is located approximately 89.0m from Hamilton Drive and 20.0m from Petersen Road. The equipment cabinet is located approximately 16.5m from Petersen Road and approximately 96.0m from Hamilton Drive.

The proposed development will not impact the natural conservation values and environmental functions of the site. Improved access to telecommunications infrastructure will benefit local residents, businesses and tourists visiting the area and will contribute to the communities wellbeing.

Notwithstanding separation distances, the facility meets the maximum cumulative EME level, being 0.74% of the public exposure limit. The submitted material therefore demonstrates that the social wellbeing and safety outcomes sought by the Telecommunication Facility Code can be met.

Visual amenity

The proposed facility has been sited and designed to utilise the existing mature vegetation to screen the base of the tower and compound area from the closest residential properties. Furthermore, the proposed site is located below the ridgeline further south on Petersen Road, which limits the impact from the proposed development to distant viewpoints. The facility (monopole, headframe and antennas) can be painted to further reduce the impact. Whilst the application material does not provide the colour selection, a condition has been imposed for the facility to be non-reflective and visually equivalent to the surrounding area, or an alternative colour to Council's satisfaction, to reduce its visual recognition in the landscape.

Acceptable Outcome 3.1 of the Code required warning information signs and security fencing around the perimeter of the telecommunications facility site to prevent unauthorised entry. A 10m x 10m enclosed compound with a 2.4m high chain-link security fence. All cables connecting the antennas will be internal to the monopole, except where they exit the monopole to connect to the relevant antennas. The applicant advises the monopole does not have any provision to allow it to be climbed and the equipment cabinets are secure and vandal-proof. Mandatory warning signs will be posted as necessary. This is consistent with the outcomes sought by

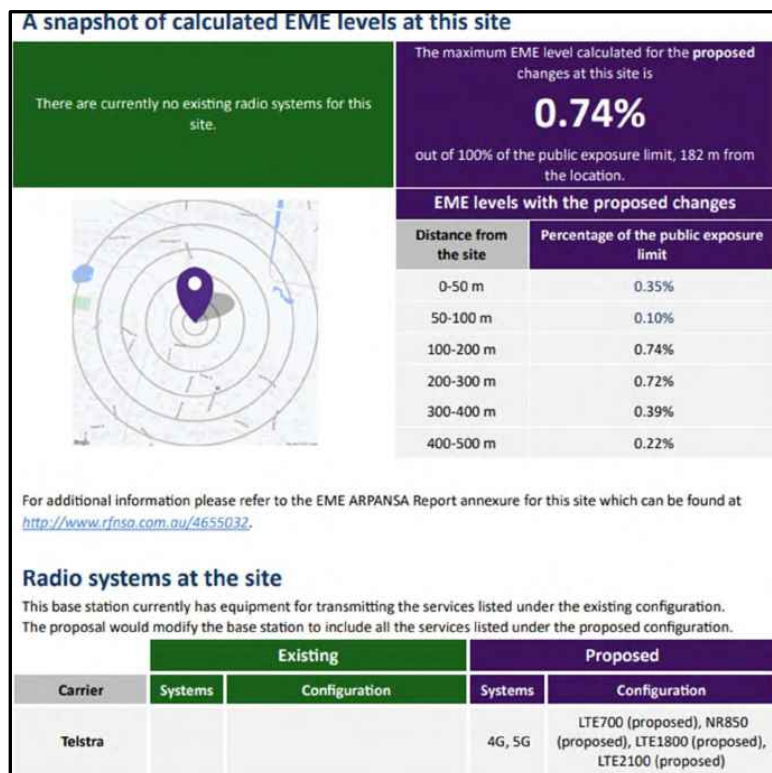
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performance outcome 3: 'The telecommunications facility is secure, public health and safety is protected and potential damage from vandalism is minimised.'

Electromagnetic Radiation Emissions

Acceptable Outcome 3.2 of the Code states electromagnetic radiation (EMR) emissions from the telecommunication facility must be in accordance with the maximum exposure levels as set in the *Radiation Protection Standard – Maximum Exposure Levels to Radiofrequency Fields – 3kHz to 300GHz* (Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) 2003).

The proposed facility meets the public safety standard mandated by ARPANSA, which was last updated in 2021, and is confirmed by the following EME report:



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

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

Distance from the site	Existing configuration			Proposed configuration		
	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
0-50m				3.46	31.78	0.35%
50-100m				1.43	5.40	0.10%
100-200m				3.97	41.74	0.74%
200-300m				3.95	41.31	0.72%
300-400m				2.97	23.45	0.39%
400-500m				2.23	13.20	0.22%

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 CS64:2020](#) or other means. Calculations are performed over the indicated height range and include all existing and any proposed radio systems for this site.

Maximum cumulative EME level for the proposed configuration

Location	Height range	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
Dwelling 1	0-6 m	0.61	0.98	0.02%
Dwelling 2	0-5 m	0.88	2.05	0.04%
Dwelling 3	0-6 m	1.17	3.61	0.08%
Dwelling 4	0-6 m	1.80	8.62	0.16%
Dwelling 5	0-6 m	3.52	32.79	0.55%

Figure 10 - Extract of EME report

Refer Attachment 3 – Environmental EME Report

The tables of calculated EME levels in the report provide maximum levels of EME found at various distances from the base of the tower. Within each range of distances, the highest value is given regardless of direction. The values of EME are presented in 3 different units:

- Volts per metre (V/m) – the electric field component of the RF wave
- Milliwatts per square metre (mWm²) – the power density (or rate of flow of RF energy per units area)
- Percentage (%) of the ARPANSA Standard.

When expressed as a percentage, a value of 100% corresponds to the general public exposure limit. For example, the typical highest value of 1% means that the total EME level from all wireless network transmitters on the site, all operating at their maximum power, will be no more than one hundredth (1/100) of the limit set by the ARPANSA Standard for members of the public.

The submitted EME report identifies the highest calculated level of RF EME coming from the proposed facility is found at a distance of 182 metres from the base of the tower and 0.74% or 0.74/100 of the ARPANSA Standard exposure limit. The development therefore demonstrates compliance with Acceptable Outcome 3.2, with EMR emissions well below the maximum exposure levels set by ARPANSA.

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Co-location Opportunities

Co-location options may not be available in all circumstances as there may not be any existing vertical structures in the area, or no rooftops high enough to provide a feasible co-location options. As such, a new 'greenfield' is required. As per **Figure 9**, registered sites were identified on the RFNSA within a 4km radius of the subject site. The applicant advocates *"there is a clear lack of telecommunication facilities in the immediate area surrounding the proposed location. Of the three registered telecommunication facilities identified in the below map only one exists, which is not close enough or of sufficient height to achieve the specific coverage objectives required to service the Craignish area"*. As such, the new monopole will provide for co-location in accordance with the requirements of Performance Outcome 5 of the Code.

2.2.3 Landscaping Code

The applicant advised small scale planting could be incorporated around the monopole and cabinets (provided they don't interfere with maintenance access or car park safety). Seven (7) trees are required to be removed in order to facilitate the proposed Telecommunications Facility and meet the required Asset Protection Zone (APZ) that includes removal of any canopy over the proposed compound. Furthermore, the area (and immediate surrounds) associated with the proposed facility is well maintained grassy understorey with scattered canopy of eucalypt trees. A residential property is located to the south with dense bushland to the west and north (typical of a notophyll to microphyll vine/palm forest).

As such, suitable conditions have been imposed to ensure a replacement of a minimum 2 trees within the subject site for each tree removed.

2.2.4 Transport and Parking Code

Vehicular access to the facility is proposed directly from Petersen Road via a new sealed access track. Access will be adequate for both construction and ongoing maintenance of the site and will be constructed in accordance with the Planning Scheme and standard drawing FC-230-03 – Rev (B) – Type 'B'. Once the facility is operational, it will require infrequent maintenance visits. As such, access to and from the telecommunications infrastructure will be retained for maintenance purposes. Furthermore, dedicated parking spaces are not considered necessary for the site given the very low traffic generation of the use and the unstaffed nature of the site.

2.2.5 Works, Services and Infrastructure Code

All necessary infrastructure, services and utilities are available to accommodate establishment of the facility in accordance with the outcomes sought by this code, subject to conditions.

2.2.6 Acid Sulfate Soils Overlay Code

The site is mapped as being located within the Acid Sulfate Soils Overlay (land at or below 5m AHD and land above 5m AHD but below 20m AHD), however, the proposed telecommunication facility is located in the land above 5m AHD but below 20m AHD. The applicant has advocated *'the proposal will undergo a geotechnical survey to determine the extent and severity of acid sulphate soils in area'*. Should acid sulphate soils be detected, the development has been conditioned to ensure a management plan is prepared to manage any acid sulphate soils that may be extracted during the construction of the telecommunication facility.

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Figure 11 – Extract of Acid Sulfate Soils Overlay Map

2.2.7 Biodiversity Areas, Waterways and Wetlands Overlay Code

The subject site is mapped as being located within the Biodiversity Areas, Waterways and Wetlands Overlay (MSES – Wildlife Habitat, Regulated Vegetation Essential Habitat, Regulated 100m from Wetland, Ecological Significance Wetlands, Local Wetlands and Buffer). The proposed telecommunication facility is located within the mapped local wetland buffer. The proposed telecommunications facility incorporates very minimal hard surfaces and therefore will generate insignificant stormwater runoff from the site. The facility will not generate any hazardous materials and is not expected to have an impact on the quality of surrounding wetlands.

The Bushfire report provided as part of supporting material, recommends a 10.0m Asset Protection Zone (APZ) which requires the removal of seven (7) native trees, identified in the Vegetation Management Plan. The Vegetation Management Plan provided does not identify the seven (7) trees to be removed and conditions are applied for their identification and to provide offset planting.

The Vegetation Management Report, prepared by Gondwana Ecology Group conclude *‘with regards to ecology matters, noting the current land use and values and location/design of the facility, the intent (purpose and outcomes) of the Environmental Management and Conservation Zone will not, in my opinion, be compromised’*.

Refer Attachment 4 – Vegetation Management Plan, prepared by Gondwana Ecology Group

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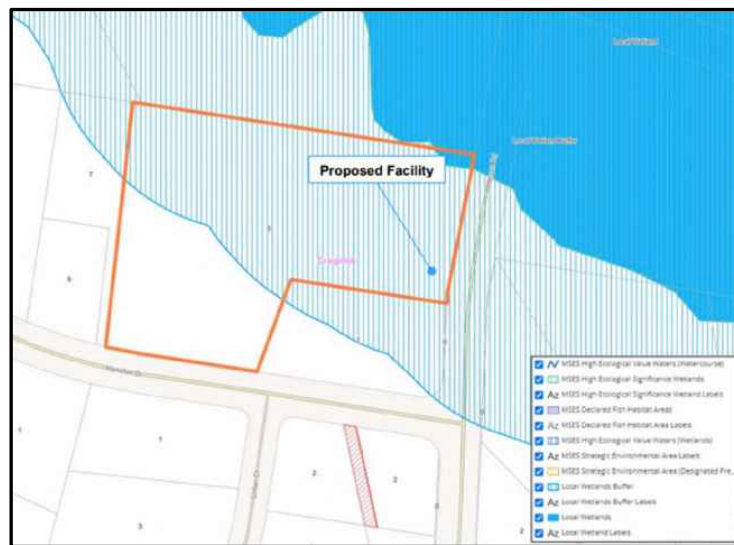


Figure 12 – Extract of Biodiversity Areas, Waterways and Wetlands Overlay Map

2.2.8 Bushfire Hazard Overlay Code

The subject site is mapped as being located within the Bushfire Hazard Overlay (Bushfire Hazard Potential Impact Buffer, Medium and High Potential Bushfire Intensity). The proposed telecommunication facility is specifically located within the Bushfire Hazard Potential Impact Buffer). The proposed telecommunication facility is located within an existing cleared area and is designed to operate on an unstaffed basis reducing the risk and safety of people. Furthermore, operation of the facility will not result in any excessive heat, sparks or naked flames.

The applicant has provided a Bushfire Hazard Assessment and Management Plan, prepared by Ecological Australia as part of the supporting material. The report recommends the below to mitigate bushfire risk:

- The lease area is maintained to the identified standard;
- A 10m APZ implemented around the external perimeter of the lease area, to the fullest extent possible; and
- Specific construction response including construction to withstand a minimum 40 kW/m² radiant heat and ember protection.

Further, the proposed facility will improve communications during times of natural disaster, including the inclusion of back-up battery power should the power supply be cut.

The establishment of the proposed facility will not significantly increase risk or compromise the outcomes sought by the Bushfire Hazard Overlay Code.

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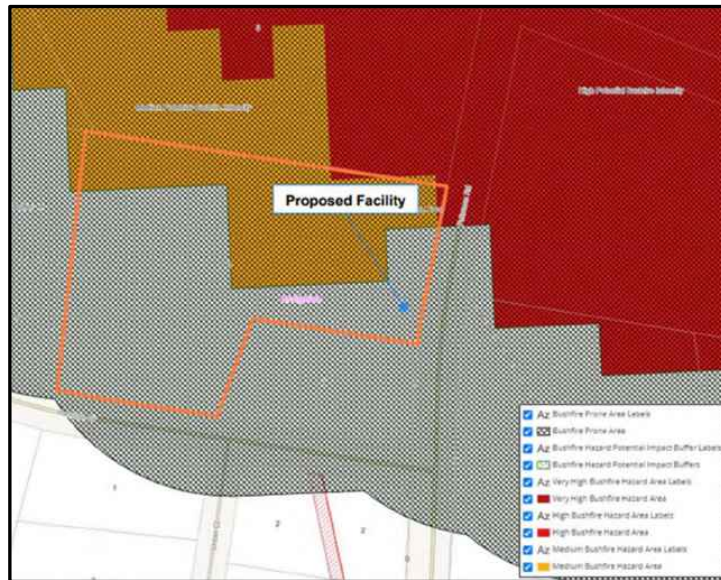


Figure 13 – Extract of Bushfire Hazard Overlay Map

Refer Attachment 5 – Bushfire Hazard Assessment and Management Plan, prepared by Ecological Australia

2.2.9 Coastal Protection Overlay Code

The subject site is mapped as being located within the Coastal Protection Overlay (Medium Hazard Storm Tide) however, the proposed facility is outside of the mapped overlay. Therefore, it is considered that the facility will not be impacted by or have any impacts on the Coastal Protection Overlay. As such, further assessment is not required.



Figure 14 – Extract of Coastal Protection Overlay Map

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2.2.10 Flood Hazard Overlay Code

The subject site is mapped as being located within the Flood Hazard Overlay. However, the proposed facility is located outside of the mapped overlay. Therefore, the facility will not be impacted by, nor will it have any impacts on, the Flood Hazard Overlay. As such, further assessment is not required.



Figure 15 – Extract of Flood Hazard Overlay Map

2.2.11 Environmental Management and Conservation Zone Code

The purpose of the Environmental Management and Conservation Zone is to provide for the protection and maintenance of areas that support biological diversity, ecological integrity, naturally occurring landforms and coastal processes. The proposed facility has been sited and designed to respect the natural environmental values of the site and will not reduce the integrity of the existing environmental values of the site by locating the facility within an existing cleared area. The proposed development has been situated below the prominent ridgeline to the south. The site will not be prominently visible from nearby residential properties and will be screened by existing vegetation when viewed from properties that immediately adjoin the site.

Furthermore, the proposed facility will meet the community's need for improved telecommunications infrastructure. Additionally, the proposed facility will enable other mobile carriers to locate equipment at the site and allow for future telecommunications upgrades in the area. Improving the access to telecommunications infrastructure will benefit local residents, businesses and tourists visiting the area and will contribute to community wellbeing.

2.3. Assessment Benchmarks pertaining to a Temporary local planning instrument

Not applicable. Council has not currently adopted any temporary local planning instruments (TLPI). Council's draft TLPI for the flood hazard area is addressed in section 2.7.1 (Proposed Temporary Local Planning Instrument (TLPI) 01/24 Flood Hazard Area) of this report.

2.4. Assessment Benchmarks pertaining to a Variation Approval

Not applicable. The site is not subject to any existing variation approvals.

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2.5. Assessment Benchmarks pertaining to the Planning Regulation 2017

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

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

The following assessment benchmarks are applicable to this application:

- Dark Sky Code of the Wide Bay Burnett Regional Plan
- Natural hazards, risk and resilience assessment benchmarks from the State Planning Policy

2.5.1. Dark Sky Code of the Wide Bay Burnett Regional Plan (Regional Plan)

The Dark Sky Area Code provides an assessment benchmark to ensure development does not adversely impact on sea turtle and shorebird activity, including their breeding, feeding or resting activities. Under the *Planning Regulation*, this benchmark must be considered in the assessment of any development application.

The purpose of this code is to ensure that development in the Dark Sky Area does not adversely impact on sea turtle and shorebird activity. Specifically, this code seeks to ensure:

1. development avoids artificial lighting that is visible from the beach or the ocean
2. development avoids artificial lighting that contributes to sky glow within the Dark Sky Area

The development will not involve any significant lighting and will not adversely impact on sea turtle or shorebird activity.

2.5.2. Natural hazards, risk and resilience assessment benchmarks from the State Planning Policy (SPP)

The development requires assessment against the assessment benchmarks for Natural hazards, risk and resilience as these have not been integrated into the planning scheme.

The development avoids natural hazard areas and will improve disaster management responses by providing improved telecommunications services. The development complies with the Natural hazards, risk and resilience assessment benchmarks from the SPP.

2.6. Other Assessment Matters to have regard to

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

- The Wide Bay Burnett Regional Plan, to the extent the regional plan is not identified in the planning scheme as being appropriately integrated in the planning scheme; and
- The State Planning Policy, to the extent the State Planning Policy is not identified in the planning scheme as being appropriately integrated in the planning scheme.

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2.6.1. Wide Bay Burnett Regional Plan (Regional Plan)

Since the time the *Fraser Coast Planning Scheme* commenced in 2014, the Wide Bay Burnett Regional Plan came into effect in December 2023 and must be considered for development assessment to the extent the Regional Plan is inconsistent with the planning scheme. The proposal is consistent with the policy intent of the Regional Plan to expand the telecommunication footprint and provide the region with more reliable internet connectivity.

2.6.2. State Planning Policy (SPP)

Since the time the *Fraser Coast Planning Scheme* commenced in 2014, a new State Planning Policy came into effect on 3 July 2017 and must be considered for development assessment to the extent the SPP is inconsistent with the planning scheme. The proposal is consistent with the policy intent of the SPP and does not conflict with any of the identified state interests.

2.7. Assessment against any other relevant matters

In accordance with section 45 of the *Planning Act* 2016, an impact assessment may be carried out against, or having regard to, any other relevant matters, other than a person's personal circumstances, financial or otherwise. Examples of another relevant matter include:

- A planning need
- The current relevance of the assessment benchmarks in the light of changed circumstances
- Whether assessment benchmarks were based on material errors.

2.7.1. Proposed Temporary Local Planning Instrument (TLPI) 01/24 Flood Hazard Area

On Wednesday 24 July 2024, Council resolved to make a Temporary Local Planning Instrument – TLPI 01/24 Flood Hazard Area (TLPI). The TLPI will amend the flood hazard area extent mapping in the *Fraser Coast Planning Scheme 2014* and is currently with the State Government for review.

Council also resolved to make the flood studies available for information purposes – see Fraser Coast Regional Council | Proposed Temporary Local Planning Instrument (TLPI) 01/24 Flood Hazard Area (engagementhub.com.au).

The current flood levels for the site were not reduced under TLPI 01/24 – Flood Hazard Area.

3. CONSULTATION

3.1. Internal Referrals

Development Engineering

Council's Development Engineers reviewed the proposal and recommended conditions for approval.

3.2. Referral Agencies

Not applicable

3.3. Third Party Referrals

Not applicable

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3.4. Public Notification

The application was publicly notified in accordance with the requirements of the *Planning Act 2016*. 10 submissions were received, including one petition with 70 signatures. An additional petition was also received as a copy of correspondence addressed to the applicant and landowner.

The following table provides a summary and assessment of the issues raised by submitters.

Issues	Comments
Electromagnetic energy (EME) and potential health effects	<p>The submitted EME report identifies the highest calculated level of RF EME coming from the proposed facility is found at a 182 metres from the base of the tower and 0.74% or 0.74/100 of the ARPANSA Standard exposure limit.</p> <p>The applicant was requested to respond to these concerns and advised:</p> <p><i>“Service Stream acknowledges that 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.</i></p> <p><i>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).</i></p> <p><i>The facility will comply with ACMA EME regulatory arrangements in relation to emission of electromagnetic energy (EME), this specifically being the Radiation Protection Series S-1 (Rev. 1) - Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz (2021) known as RPS-1. RPS-1.</i></p> <p><i>The RPS-1 Standard is set by ARPANSA and is based on the safety guidelines recommended by the International Commission on Non-Ionising Radiation Protection (ICNIRP). ICNIRP has recently undertaken an extensive review of the available scientific evidence and research on EME and health. ICNIRP is an agency associated with the World Health Organisation (WHO).</i></p> <p><i>The Standard operates by placing a limit on the strength of the signal (or RF EME) that Carriers 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.</i></p> <p><i>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</i></p>

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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 users 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 have undertaken a compliance report that predicts the maximum levels of radiofrequency EME from the proposed facility. The EME Report associated with this site is attached in Appendix 3. The report shows that the maximum predicted EME levels will equate to 0.74% of the maximum exposure limit under the Australian Standard.

Carriers rely on the expert advice of national and international health authorities such as 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.

Carriers have 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 the Carrier's responsible approach to EME and mobile phone technology.

The Australian Chief Medical Officer, Brendan Murphy, issued a statement in January 2020 to provide further assurance of the safety of 5G and other mobile technologies. The statement reads:

"I'd like to reassure the community that 5G technology is safe. There is no evidence telecommunication technologies, such as 5G, cause adverse health impacts"

The full extent of the statement is available here: <https://www.health.gov.au/news/safety-of-5g-technology>"

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Environmental Concerns/ Impact on Flora and Fauna	<p>A number of submissions raised concerns about the potential impact from EME on the flora and fauna of the surrounding area.</p> <p>The applicant was requested to respond to these concerns and advised:</p> <p><i>“The ecological impact assessment prepared by EcoLogical Australia noted all vegetation that is to be cleared as part of the proposal does not support obvious habitat features or significant ecological values.</i></p> <p><i>The site is to be situated in an area that has previously been cleared of vegetation and is not considered to be of a high ecological importance.</i></p> <p><i>The proposal is situated adjacent an existing roadway and electrical infrastructure and has previously been cleared of vegetation and altered from a natural state.</i></p> <p><i>The proposed works are localized to a relatively small area mainly the fenced 10m x 10m compound area and the asset protection zone required for bushfire risk compliance. The works in this small area are not anticipated to have any negative impact on local flora and fauna.</i></p> <p><i>With respect to possible effects of RF EME on flora and fauna, in 2019 Telstra asked ARPANSA for their response on the issue of possible effects on flora and fauna. They replied, “There is no established evidence that EME exposure from wireless telecommunications sources is harmful to flora or fauna. It should be remembered that many of the studies investigating human health are performed in the laboratory on animals and plant cells.”</i></p>
Alternative Location	<p>A number of submissions raised suggestions of the proposed facility being relocated to an alternative location on the subject site with a larger cleared area.</p> <p>The applicant was requested to respond to these concerns and advised:</p> <p><i>“The suggested alternative location further east of the proposed site within an existing clearing would not be suitable.</i></p> <p><i>This location would bring the site close to existing residential buildings in the area and would increase the visual impact of the facility to the closest residents.</i></p> <p><i>The site would involve additional tree removal due to the need to build a longer access track and to achieve the required 10.0m APZ in all directions.</i></p> <p><i>The proposed site closer to Petersen Road only requires a 15.0m long access track and takes advantage of the road and road reserve area to form part of the APZ”.</i></p>

27 August 2025

Urban & Visual Impact	<p>A number of submissions raised concern of the alternative sites being rejected based on the visual amenity.</p> <p>The applicant was requested to respond to these concerns and advised:</p> <p><i>Today telecommunication facilities are an established feature of the built environment (much like power poles and powerlines) given they provide a necessary service and essentially contribute to the wellbeing of a community. It is recognised that, similar to all forms of infrastructure and development, telecommunications facilities have a visual impact. This visual impact can be attributed to two unavoidable characteristics of mobile phone base stations:</i></p> <ul style="list-style-type: none"> • <i>They are structures which generally protrude above other structures; and</i> • <i>They need to be located at suitable heights and visibility in order to operate effectively.</i> <p><i>The proposed site has been designed with the following considerations to mitigate visual impact:</i></p> <ul style="list-style-type: none"> • <i>Neutral non reflective colour finish to blend in with the surrounding landscape.</i> • <i>Located in an area that is acceptably separated from residential properties and does not have residential properties facing directly on to the site”.</i>
Property Valuation	<p>Property values are a subjective matter that cannot be considered as a planning ground in the assessment. However, the applicant has provided a response to these concerns and advised:</p> <p><i>“In regard to property value, to work effectively, base stations need to be located near to the people who are accessing this technology. Property valuation is a complex issue, with fluctuations in price being subject to several factors. Many of these are subjective, and may be as diverse as aspect, views, condition of the property, local amenity and access to services, including high quality communications. Since the mid-1990s, thousands of telecommunication facilities have been installed throughout Australian metropolitan and regional areas. During this period, property values have continued to increase, showing no clear signs of deterioration as a result of the location of communications facilities. Telstra is not aware of any credible evidence that directly links the siting of telecommunications facility to a decrease in property prices”.</i></p>
Legal & Policy	<p>Legal and Policy are a subjective matter that cannot be considered as a planning ground in the assessment. However, the applicant has provided a response to these concerns and advised:</p> <p>The applicant was requested to respond to these concerns and advised:</p>

27 August 2025

	<p><i>“All relevant planning and environmental legislation has been addressed in the development application.</i></p> <p><i>All of Telstra’s mobile base stations are designed to comply with the relevant Australian safety standard known as the Radiation Protection Series – S1 (Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz) or RPS S-1. You can read about the RPS S-1, EME and health here:</i></p> <p><i>https://www.arpana.gov.au/sites/default/files/rps_s-1.pdf</i> <i>https://www.arpana.gov.au/regulation-and-licensing/regulatory-publications/radiation-protectionseries/codes-and-standards/rps-1-qa</i> <i>https://www.telstra.com.au/consumer-advice/eme</i> <i>http://www.emfexplained.info/?ID=24897</i> <i>https://www.communications.gov.au/what-we-do/spectrum/5g-and-eme</i> <i>https://www.acma.gov.au/eme-5g-and-you”</i></p>
<p>Community need for improved coverage and the introduction of satellite technology</p>	<p>Whilst a number of submissions raised concerns on the health risks relating to EME, submission also raised the benefits of a Telecommunication Facility within this area.</p> <p>The applicant was requested to respond to these concerns and advised:</p> <p><i>“Telstra have identified areas of limited mobile coverage in the East Toogoom area —particularly north of Pialba Burrum Heads Road and around Petersen Road toward Dundowran Beach.</i></p> <p><i>The primary challenge providing adequate coverage to the area is the surrounding terrain, which prevents neighboring Telstra sites from delivering effective coverage. To address this, a new site is proposed near Petersen Road to enhance both coverage and service quality.</i></p> <p><i>Telstra will continue to invest in and enhance our mobile network to meet changing customer needs. Satellite to mobile is an exciting technology that provides an additional layer of connectivity separate to our mobile network.</i></p> <p><i>The mobile network will continue to deliver a faster, higher quality and more reliable experience than satellite to mobile.</i></p> <p><i>Our mobile coverage footprint reaches 99.7% of Aussies over an area of 3 million square kilometres which is around 1 million square kilometres more than any other network.</i></p> <p><i>Over the past seven years to the end of FY24 Telstra has invested \$11.8bn into our mobile network across the country. This investment continues and extends to the establishment of new sites. Telstra also continue to focus on improving network resilience across all our technologies, architecture and network operations to</i></p>

27 August 2025

	<i>make the network as reliable as possible. This includes making equipment more resilient in disaster-prone areas and increasing redundancy through adding diversified backhaul pathways including using satellite backhaul solutions”.</i>
Community Use	<p>Whilst a number of submissions raised concerns on the health risks relating to EME, submissions also raised the benefits of a Telecommunication Facility within this area.</p> <p>The applicant was requested to respond to these concerns and advised:</p> <p><i>“The proposal will not infringe on the community’s ability to use the area for recreational activities. The compound area is fenced off for safety reasons and to restrict access to the monopole and equipment shelters.</i></p> <p><i>The compound size has been kept to the very minimum required, in this instance a 10.0m x 10.0m area is needed to house a Telstra equipment shelter and allow access for maintenance vehicles.</i></p> <p><i>The improved mobile coverage will enhance the ability of the community to safely enjoy the adjacent recreation area, the nearby recreational areas along the coast and the O’Regan Creek Conservation area”.</i></p>

4. CONCLUSION

The application seeks a development approval to construct a new telecommunications facility in the form of a 30m tall monopole and ground-based equipment on Council’s Reserve at Craignish Road, Craignish. The proposed facility will be utilised by Telstra and will significantly improve the level of service to the surrounding community. The proposed facility is specifically designed to facilitate co-location.

The assessment confirms strong justification for the development. The proposed Telecommunications Facility will use some cleared land to minimize vegetation removal with only seven trees needing to be removed for the Asset Protection Zone (APZ) and clear canopy over the compound. Access will be via a new driveway on Petersen Road. Furthermore, the proposed monopole is located approximately 89.0m from Hamilton Drive and 20.0m from Petersen Road. The equipment cabinet is located approximately 16.5m from Petersen Road and approximately 96.0m from Hamilton Drive.

The overlays applicable to the subject land are either not relevant to the location selected or are not materially impacted by the proposal. The proposed facility shows a high level of consistency with the Environmental Management and Conservation Zone Code and compliance with the Telecommunications Facility Code.


When assessing an impact assessable development application, Council must make a balanced decision and consider matters of public interest beyond only those contemplated in the assessment benchmarks. This facility will contribute to the essential services and infrastructure provided for the residents of Craignish and the surrounding region. The proposed telecommunications facility provides a response to the need for improved and enhanced telecommunication network coverage and capacity to meet the differing needs and future growth of the domestic and commercial sectors of the community.

27 August 2025

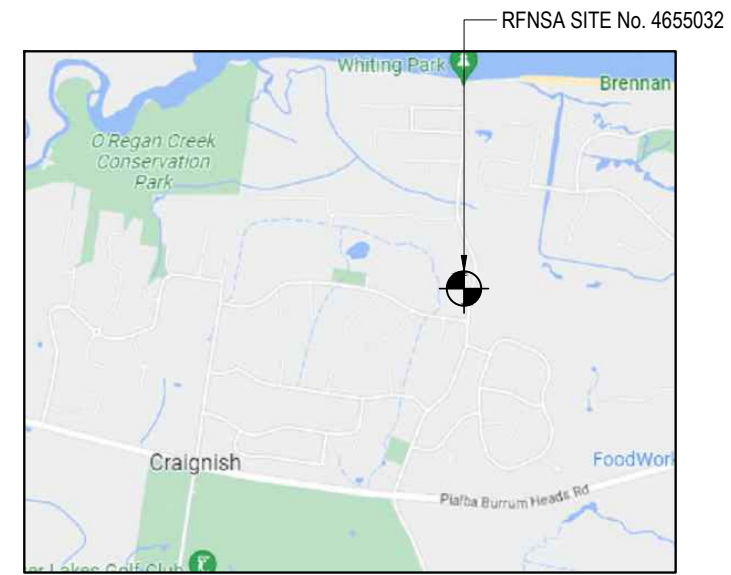
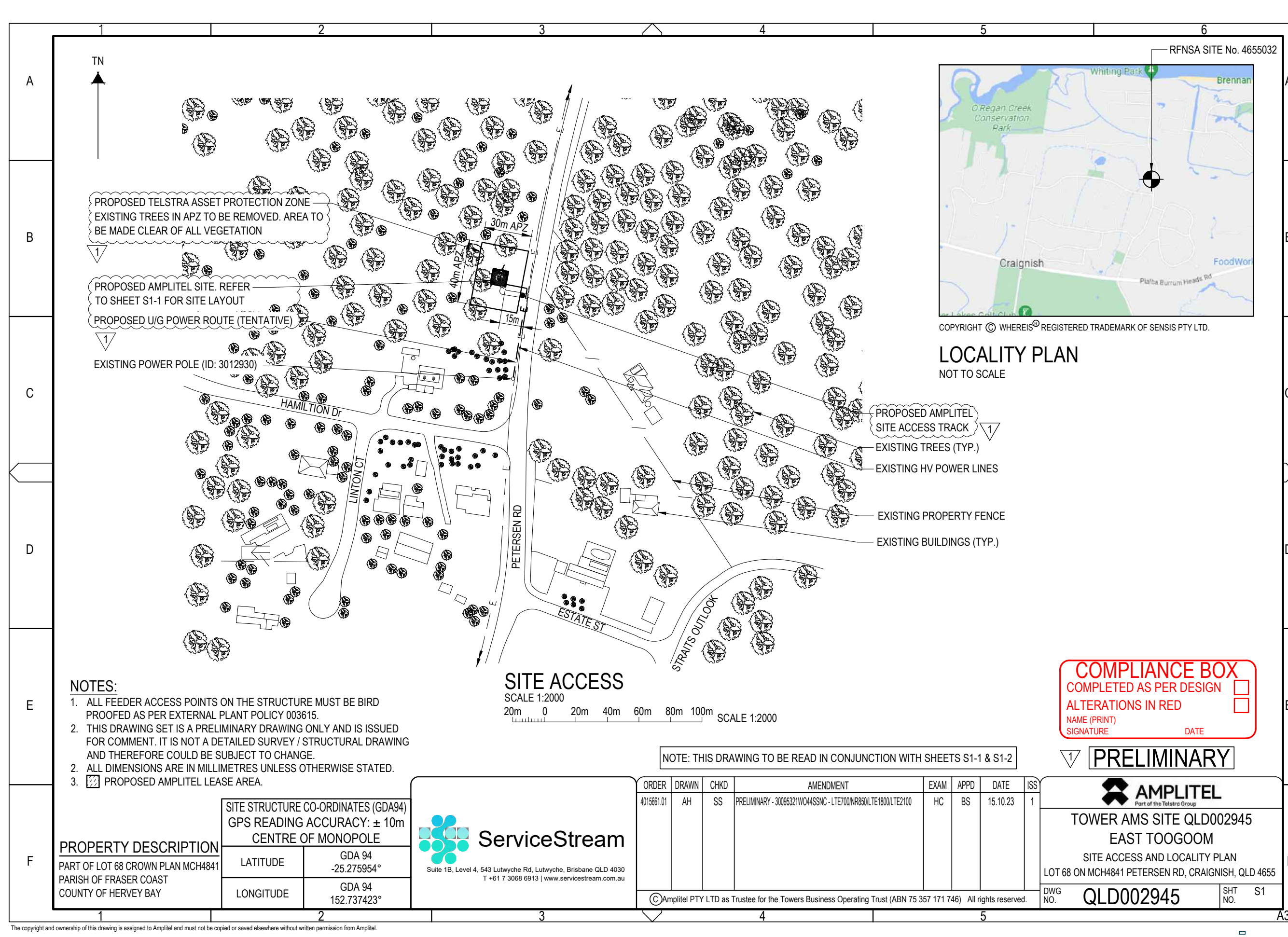
It is recommended that the application by ServiceStream to develop land described as Lot 68 on MCH4841, situated at Craignish Road, Craignish QLD 4655 for Material Change of Use for a Telecommunications Facility should be approved generally as detailed in the submitted application material, subject to development conditions.

27 August 2025



	<p>Date: 30/07/2025</p>	<p>Scale: 1:2257 When Printed @ A4</p>
	<p>© The State of Queensland (Department of Natural Resources and Mines) and Fraser Coast Regional Council. While every care is taken to ensure the accuracy of this map, Fraser Coast Regional Council and Department of Natural Resources and Mines and makes no representation or warranties about its accuracy, reliability, completeness or stability for any particular purpose and disclaims all responsibility and all liability (including without limitation, liability in negligence) for all expenses, losses, damages (including direct or consequential damage) and costs which you might incur as a result of the map being inaccurate or incomplete in any way and for any reason.</p> <p>Projection: GDA2020 / MGA zone 56 Map created by: Cassie Anderson</p>	





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LOCALITY PLAN

NOT TO SCALE

PROPOSED TELSTRA ASSET PROTECTION ZONE
EXISTING TREES IN APZ TO BE REMOVED. AREA TO BE MADE CLEAR OF ALL VEGETATION

PROPOSED AMPLITEL SITE. REFER TO SHEET S1-1 FOR SITE LAYOUT

PROPOSED U/G POWER ROUTE (TENTATIVE)

EXISTING POWER POLE (ID: 3012930)

PROPOSED AMPLITEL SITE ACCESS TRACK

EXISTING TREES (TYP.)

EXISTING HV POWER LINES

EXISTING PROPERTY FENCE

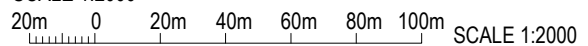
EXISTING BUILDINGS (TYP.)

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2. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS OTHERWISE STATED.
3. PROPOSED AMPLITEL LEASE AREA.

SITE ACCESS

SCALE 1:2000



NOTE: THIS DRAWING TO BE READ IN CONJUNCTION WITH SHEETS S1-1 & S1-2

COMPLIANCE BOX

COMPLETED AS PER DESIGN

ALTERATIONS IN RED

NAME (PRINT) _____

SIGNATURE _____ DATE _____

PRELIMINARY

PROPERTY DESCRIPTION	SITE STRUCTURE CO-ORDINATES (GDA94)	
	GPS READING ACCURACY: ± 10m	
	CENTRE OF MONOPOLE	
LATITUDE	GDA 94	
	-25.275954°	
LONGITUDE	GDA 94	
	152.737423°	

ServiceStream

Suite 1B, Level 4, 543 Lutwyche Rd, Lutwyche, Brisbane QLD 4030
T +61 7 3068 6913 | www.servicestream.com.au

ORDER	DRAWN	CHKD	AMENDMENT	EXAM	APPD	DATE	ISS
4015661.01	AH	SS	PRELIMINARY - 30095321W044SSNC - LTE700INR850LTE1800LTE2100	HC	BS	15.10.23	1

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TOWER AMS SITE QLD002945

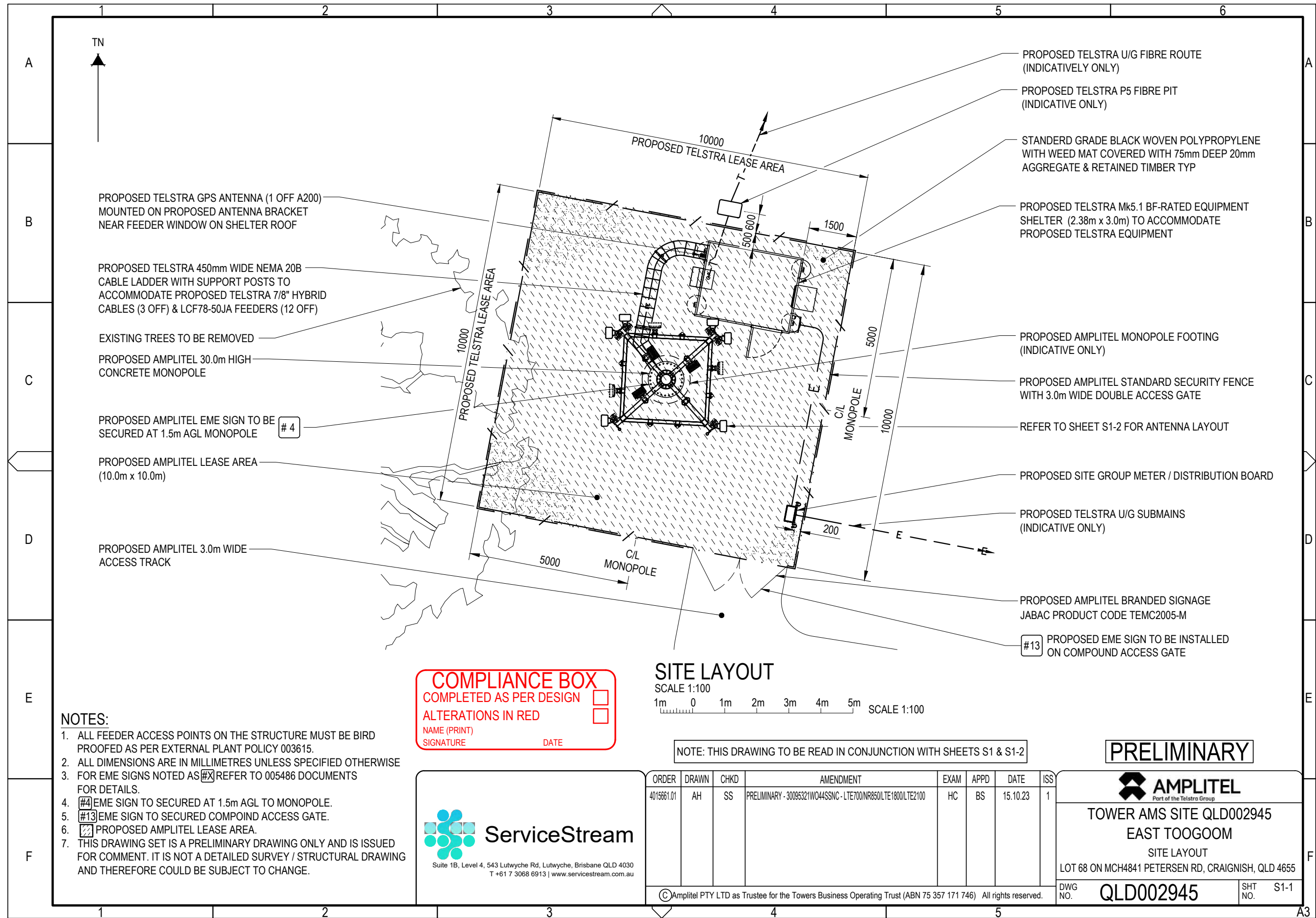
EAST TOOGOOM

SITE ACCESS AND LOCALITY PLAN

LOT 68 ON MCH4841 PETERSEN RD, CRAIGNISH, QLD 4655

DWG NO. **QLD002945** SHT NO. **S1**

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4. #4 EME SIGN TO SECURED AT 1.5m AGL TO MONOPOLE.
5. #13 EME SIGN TO SECURED COMPOIND ACCESS GATE.
6. [Hatched Area] PROPOSED AMPLITEL LEASE AREA.
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SITE LAYOUT
SCALE 1:100
1m 0 1m 2m 3m 4m 5m SCALE 1:100

NOTE: THIS DRAWING TO BE READ IN CONJUNCTION WITH SHEETS S1 & S1-2

PRELIMINARY



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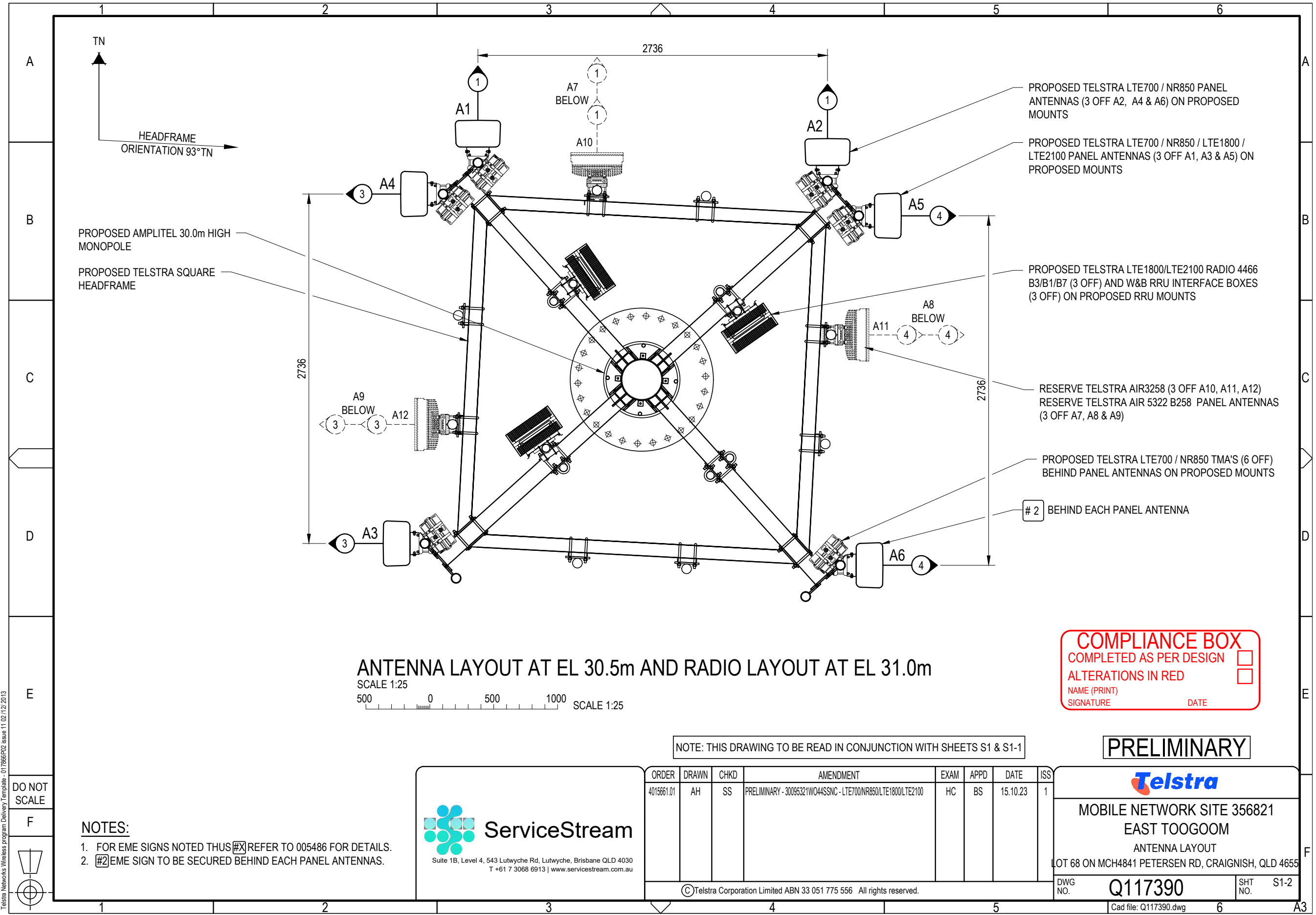
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**TOWER AMS SITE QLD002945
EAST TOOGOOM**

SITE LAYOUT
LOT 68 ON MCH4841 PETERSEN RD, CRAIGNISH, QLD 4655

DWG NO. **QLD002945** SHT NO. S1-1

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TN
HEADFRAME
ORIENTATION 93°TN

PROPOSED AMPLITEL 30.0m HIGH
MONOPOLE
PROPOSED TELSTRA SQUARE
HEADFRAME

PROPOSED TELSTRA LTE700 / NR850 PANEL
ANTENNAS (3 OFF A2, A4 & A6) ON PROPOSED
MOUNTS

PROPOSED TELSTRA LTE700 / NR850 / LTE1800 /
LTE2100 PANEL ANTENNAS (3 OFF A1, A3 & A5) ON
PROPOSED MOUNTS

PROPOSED TELSTRA LTE1800/LTE2100 RADIO 4466
B3/B1/B7 (3 OFF) AND W&B RRU INTERFACE BOXES
(3 OFF) ON PROPOSED RRU MOUNTS

RESERVE TELSTRA AIR3258 (3 OFF A10, A11, A12)
RESERVE TELSTRA AIR 5322 B258 PANEL ANTENNAS
(3 OFF A7, A8 & A9)

PROPOSED TELSTRA LTE700 / NR850 TMA'S (6 OFF)
BEHIND PANEL ANTENNAS ON PROPOSED MOUNTS

2 BEHIND EACH PANEL ANTENNA

ANTENNA LAYOUT AT EL 30.5m AND RADIO LAYOUT AT EL 31.0m

SCALE 1:25
500 0 500 1000 SCALE 1:25

COMPLIANCE BOX
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NOTE: THIS DRAWING TO BE READ IN CONJUNCTION WITH SHEETS S1 & S1-1

PRELIMINARY

Telstra Networks Wireless program Delivery Template - 017865FPC issue 11 02/12/2013

DO NOT
SCALE

F

NOTES:

- FOR EME SIGNS NOTED THUS #X REFER TO 005486 FOR DETAILS.
- #2 EME SIGN TO BE SECURED BEHIND EACH PANEL ANTENNAS.

ServiceStream
Suite 1B, Level 4, 543 Lutwyche Rd, Lutwyche, Brisbane QLD 4030
T +61 7 3068 6913 | www.servicestream.com.au

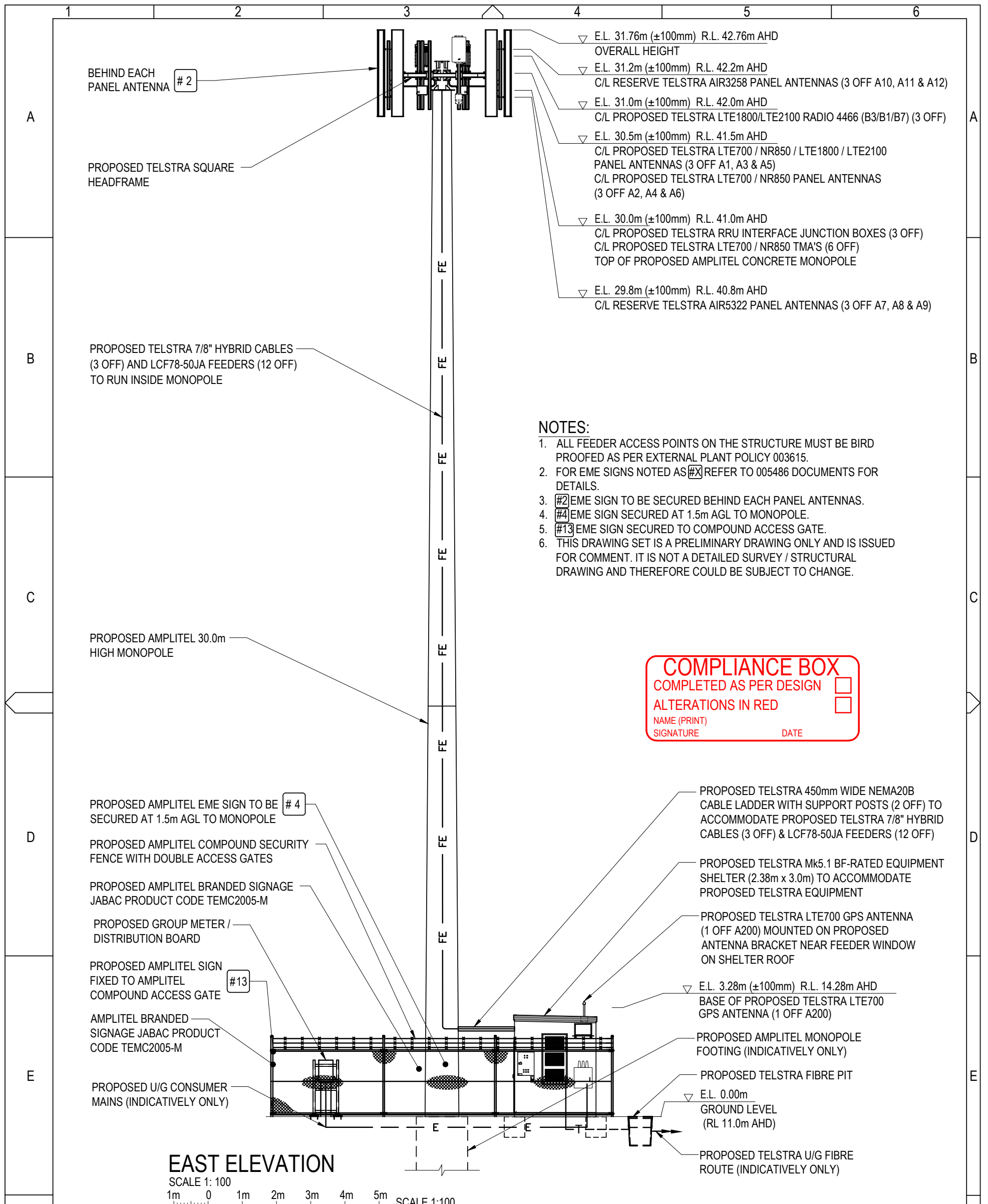
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4016661.01	AH	SS	PRELIMINARY - 30095321W044SSNC - LTE700/NR850/LTE1800/LTE2100	HC	BS	15.10.23	1

**MOBILE NETWORK SITE 356821
EAST TOOGOOM
ANTENNA LAYOUT**
LOT 68 ON MCH4841 PETERSEN RD, CRAIGNISH, QLD 4655

DWG NO. **Q117390** SHT NO. S1-2
Cad file: Q117390.dwg

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 2. FOR EME SIGNS NOTED AS #X REFER TO 005486 DOCUMENTS FOR DETAILS.
 3. #2 EME SIGN TO BE SECURED BEHIND EACH PANEL ANTENNAS.
 4. #4 EME SIGN SECURED AT 1.5m AGL TO MONOPOLE.
 5. #13 EME SIGN SECURED TO COMPOUND ACCESS GATE.
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COMPLIANCE BOX

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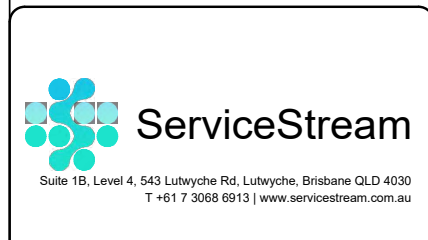
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EAST ELEVATION
 SCALE 1: 100

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PRELIMINARY



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TOWER AMS SITE QLD002945
EAST TOOGOOM
 EAST ELEVATION
 LOT 68 ON MCH4841 PETERSEN RD, CRAIGNISH, QLD 4655

DWG NO. **QLD002945** SHT NO. S3

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Received by FCRC
MCU24/0112
11 December 2024

Environmental EME Report

Location	Off Peterson Rd, CRAIGNISH QLD 4655		
Date	18/01/2024	RFNSA No.	4655032

How does this report work?

This report provides a summary of levels of radiofrequency (RF) electromagnetic energy (EME) around the wireless base station at Off Peterson Rd, CRAIGNISH QLD 4655. These levels have been calculated by Radhaz Consulting 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

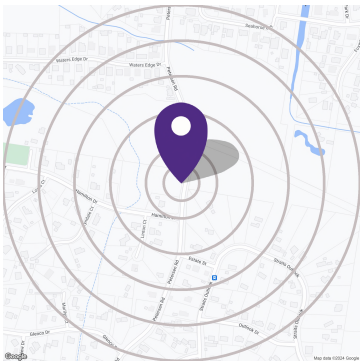
There are currently no existing radio systems for this site.

The maximum EME level calculated for the **proposed** changes at this site is

0.74%

out of 100% of the public exposure limit, 182 m from the location.

EME levels with the proposed changes	
Distance from the site	Percentage of the public exposure limit
0-50 m	0.35%
50-100 m	0.10%
100-200 m	0.74%
200-300 m	0.72%
300-400 m	0.39%
400-500 m	0.22%



For additional information please refer to the EME ARPANSA Report annexure for this site which can be found at <http://www.rfnsa.com.au/4655032>.

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, 5G	LTE700 (proposed), NR850 (proposed), LTE1800 (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 ²)	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
0-50m				3.46	31.78	0.35%
50-100m				1.43	5.40	0.10%
100-200m				3.97	41.74	0.74%
200-300m				3.95	41.31	0.72%
300-400m				2.97	23.45	0.39%
400-500m				2.23	13.20	0.22%

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 C564:2020](#) or other means. Calculations are performed over the indicated height range and include all existing and any proposed radio systems for this site.

Maximum cumulative EME level for the proposed configuration

Location	Height range	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
Dwelling 1	0-6 m	0.61	0.98	0.02%
Dwelling 2	0-5 m	0.88	2.05	0.04%
Dwelling 3	0-6 m	1.17	3.61	0.08%
Dwelling 4	0-6 m	1.80	8.62	0.16%
Dwelling 5	0-6 m	3.52	32.79	0.55%



Gondwana Ecology Group Pty Ltd
ABN 20 143 747 326

PO Box 535
Kenmore
QLD 4069

ATT: **Blake Hender**
Town Planning Consultant
Service Stream Limited
L7 Kingsgate, 2 King Street,
Bowen Hills, QLD 4002
Blake.Hender@servicestream.com.au

3 December 2024

Mr Hender

RE: VEGETATION MANAGEMENT – LOT 68 MCH4841, PETERSEN ROAD, CRAIGNISH

1. Introduction

The subject land is located at Lot 68 on MCH4841 along Petersen Road, Craignish (East Toogoom) and west of Hervey Bay (**ATTACHMENT A**). The land is currently vacant, comprises 1.73ha and is within the Environmental Management and Conservation Zone under the Fraser Coast Regional Council's (Council) Planning Scheme.

I understand that a telecommunications tower is proposed on the land (**ATTACHMENT B**).

Council confirmed in the prelodgement meeting¹ (28 September 2023) that a "vegetation management" report was to be prepared by a suitably qualified person².

2. Project Description

The project involves the installation of a Telstra Telecommunications facility at the eastern end (near the road) on the subject land. The facility includes a 30m monopole and equipment shelter within a 10m x 10m fenced compound. I also understand that the bushfire consultant³ has identified areas for management of fire risk a small area beyond the compound is needed for construction/laydown purposes. The construction and operation of the facility requires the removal of vegetation.

3. Scope

The scope of works for this reporting includes:

- Review of vegetation values and mapping
- Tree identification
- Review of bushfire reporting and clearing requirements
- Recommendations for tree retention/removal – avoidance and mitigation and management
- Consider the relevant parts of the Planning Scheme
- Calculation of environmental offset for any residual impacts to vegetation

¹ PLM23/0049, including item 3.7 Vegetation Issues.

² The author (Dr Justin Watson) has been involved in the conservation, research, environmental and consulting for 40 years (Queensland since 2000). Expert ecology witness to Planning and Environment Court since 2004, regularly engaged by local and State government to assist with projects, appeals and peer reviews. Recognised/qualified (State) botanist to conduct flora surveys. Curriculum Vitae can be provided if needed.

³ Ecological Tetra Tech Company (2024) *Bushfire Hazard Assessment and Management Plan – Telecommunications Facility*.

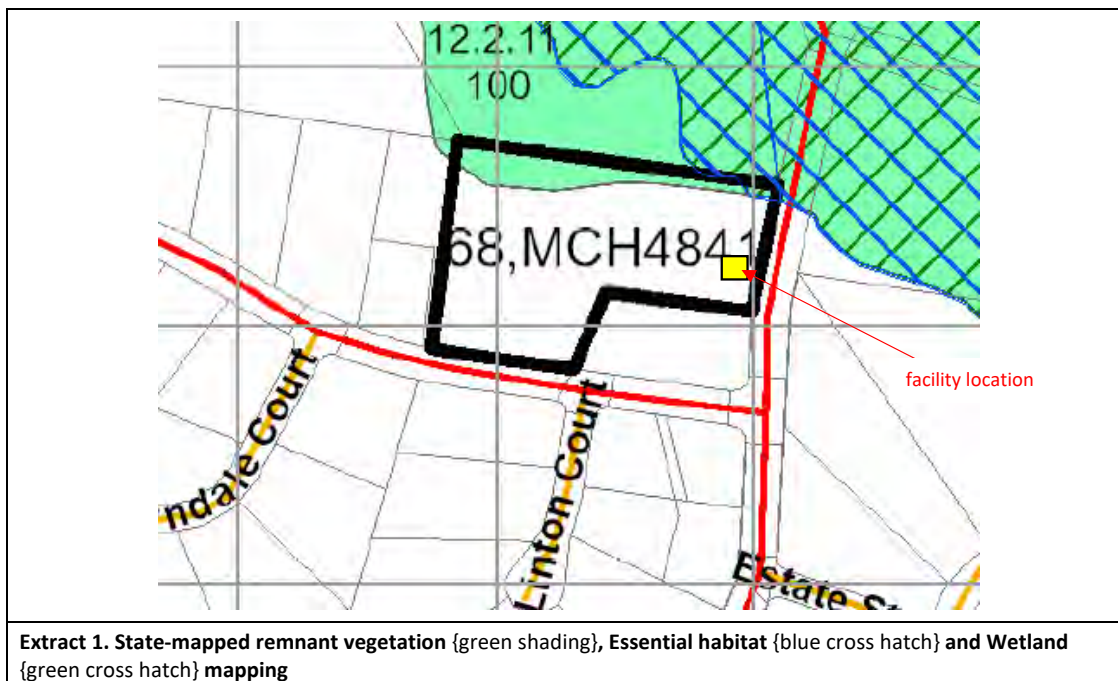


4. Ecology Values

4.1 Mapped MSES and MLES Values

MSES –

The State regional ecosystem (regulated vegetation) mapping⁴ identifies most of the land as being non-remnant (category X), while a small area in the north is mapped as *least concern* remnant vegetation (**Extract 1** below).



Extract 1. State-mapped remnant vegetation {green shading}, Essential habitat {blue cross hatch} and Wetland {green cross hatch} mapping

The regional ecosystems (REs) are further described⁵ as follows:

- RE12.2.11 - *Corymbia tessellaris* +/- *Eucalyptus tereticornis*, *C. intermedia* and *Livistona decora* woodland. Other characteristic species include *Melaleuca dealbata*, *Callitris columellaris*, *Petalostigma pubescens*, *E. exserta*, *Planchonia careya*, *Leptospermum neglectum* and *Acacia julifera*. *Melaleuca* spp. and *E. tereticornis* dominate in swales. Vine forest species sometimes present as sub-canopy or understorey. Occurs on Quaternary coastal beach ridges and swales in the northern half of bioregion.
- RE12.2.7 - *Melaleuca quinquenervia* or rarely *M. dealbata* open forest. Other species include *Eucalyptus tereticornis*, *Corymbia intermedia*, *E. bancroftii*, *E. latisinensis*, *E. robusta*, *Lophostemon suaveolens* and *Livistona decora*. A shrub layer may occur with frequent species including *Melastoma malabathricum* subsp. *malabathricum* or *Banksia robur*. The ground layer is sparse to dense and comprised of species including the ferns *Pteridium esculentum* and *Blechnum indicum* the sedges *Schoenus brevifolius*, *Baloskion tetraphyllum* subsp. *meiostachyum*, *Machaerina rubiginosa* and *Gahnia sieberiana* and the grass *Imperata cylindrica*. Occurs on Quaternary coastal dunes and seasonally waterlogged sandplains usually fringing drainage system behind beach ridge plains or on old dunes, swales and sandy coastal creek levees.

⁴ DoR (2024) Vegetation Management Report. Accessed 14 October 2024.

⁵ Queensland Herbarium REDD.



While RE12.2.7 is not a mandatory *essential habitat* factor for the wallum froglet⁶ (*Crinia tinnula*), a small area of the remnant vegetation (northeast of the site) is mapped as “essential habitat”. Refer *blue cross hatching* on **Extract 1**. Habitat for this species is described (DoR, 2024) as follows –

- Permanent to ephemeral acidic (pH 4.3 - 5.2), soft freshwater in *Melaleuca* (e.g. *M. quinquenervia*) swamps, sedgeland, wet and dry heathland (e.g. *Banksia robur*, *Xanthorrhoea*) and wallum (*Banksia aemula* shrubland/woodland) areas coastal lowlands on sand or sandstone, occasionally in adjacent open forest/woodland (e.g. *Eucalyptus racemosa*, *Corymbia citriodora*) with heathy understorey; known to persist in small remnants (<10ha); may be found well away from water.

The *essential habitat* area described above is also mapped as a “wetland on the vegetation management wetlands map”. Refer *green cross hatching* on **Extract 1** in northeast corner of land.

There are no “watercourses” or “drainage features” on the subject land. The nearest mapped “watercourse” lies more than 100m to the north of the subject land.

A review of the protected plants framework mapping identifies the remnant vegetation in the north (described above) as being a “high risk area” on a Protected Plants Flora Survey Trigger Map (refer **Extract 2**). Vegetation clearing/disturbance is to avoid the green shaded area.



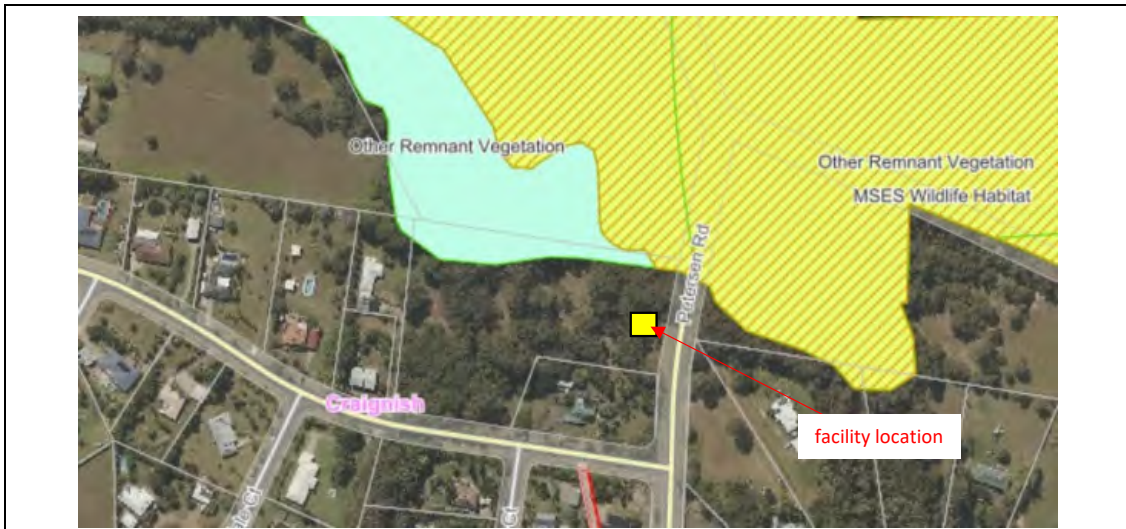
For reference, there is no *priority koala area* mapping or *core koala habitat* mapping for the locality.

⁶ Listed as vulnerable under the Queensland NC Act 1992.



MLES –

Council has mapped part of the land and surrounds as a “local wetland” with a “local wetland buffer” extending across the majority of the subject land and as “other remnant vegetation” with a small area of “MSES wildlife habitat”. **Extracts 3 and 4** reflect the Council mapping which is consistent with the State mapping/polygons described previously.



Extract 3. OOM4-B Remnant vegetation and Wildlife Habitat



Extract 4. OOM4-W – Local Wetland and Buffer



4.2 Site Values

A site inspection was completed by the author on two occasions, i.e. 18th October 2024 and 17th November 2024. The inspection/s involved opportunistic survey of general flora, fauna habitats and individual trees of interest (i.e. those associated with the proposed tower and potentially conflicted by bushfire and construction/operational requirements). The second inspection involved a more closer assessment of trees to be removed.

The area (and immediate surrounds) associated with the proposed tower can be described as a “well-maintained” grassy understorey (appears to be regularly slashed/mowed) with scattered canopy (eucalypt) trees. A residential property is located some distance to the south with dense bushland to the west and north (typical of a notophyll to microphyll vine/palm forest).

Refer also **PHOTO PLATES**.

A list of characteristic species recorded during the site inspection is provided in **Table 1** below.

Table 1. Characteristic species associated with the locality of the telecommunications facility

SCIENTIFIC NAME	COMMON NAME	COMMENTS
Trees/canopy		
<i>Corymbia intermedia</i>	bloodwood	
<i>Eucalyptus tereticornis</i>	forest red gum	
<i>Melaleuca quinquenervia</i>	paperbark	
<i>Eucalyptus exserta</i>	peppermint gum	
Shrubs/small trees		
<i>Schefflera</i>	umbrella tree	weed
<i>Ficus</i>	fig	planted
<i>Acacia disparrima</i>	wattle	
<i>Senna</i>	Easter Cassia	weed
<i>Livistona</i>	palm	
<i>Brachychiton</i>	flame tree	
<i>Acronychia</i>	acronychia	
<i>Alphitonia</i>	ash/soap bush	
<i>Macaranga</i>	Macaranga	
<i>Glochidion ferdinandi</i>	cheese tree	
<i>Schinus</i>	broad-leaf pepper	weed
Groundcover		
<i>Lomandra</i>	matrush	
<i>Parsonsia</i>	monkey rope vine	
<i>Dianella</i>	lily	
<i>Imperata</i>	blady grass	



5. Tree Survey

The tree survey was prepared by Veris (refer **ATTACHMENT C**) and covers the area and immediate surrounds associated with the proposed facility. **Table 2** provides a list of trees corresponding with the plan in **ATTACHMENT C**.

Table 2. Tree Schedule for trees associated with Telecommunications Facility

#	COMMON NAME	SCIENTIFIC NAME	SPR	DBH	HGT	TPZ	BARK TYPE - COMMENTS
57	bloodwood	<i>C.intermedia</i>	10	350	15	4200	fibrous
58	bloodwood	<i>C.intermedia</i>	10	350	15	4200	fibrous
59	paperbark	<i>M.quinquenervia</i>	8	200	10	2400	fibrous
60	bloodwood	<i>C.intermedia</i>	8	225	10	2700	fibrous
61	bloodwood	<i>C.intermedia</i>	10	300	12	3600	fibrous
62	bloodwood	<i>C.intermedia</i>	10	300	13	3600	fibrous
63	bloodwood	<i>C.intermedia</i>	12	300	16	3600	fibrous
64	bloodwood	<i>C.intermedia</i>	12	400	16	4800	fibrous, double trunk
65	paperbark	<i>M.quinquenervia</i>	6	200	10	2400	fibrous
66	forest gum	<i>E.tereticornis</i>	12	350	15	4200	smooth
67	bloodwood	<i>C.intermedia</i>	10	300	14	3600	fibrous
68	paperbark	<i>M.quinquenervia</i>	8	400	12	4800	fibrous
69	paperbark	<i>M.quinquenervia</i>	8	500	12	6000	fibrous
70	forest gum	<i>E.tereticornis</i>	14	400	18	4800	smooth
71/72	clump of trees	2x peppermint, 2x paperbark, 1x forest gum	14	400	18	4800	both
73	forest gum	<i>E.tereticornis</i>	12	300	18	3600	smooth
74	forest gum	<i>E.tereticornis</i>	10	350	14	4200	smooth
75	bloodwood	<i>C.intermedia</i>	12	300	10	3600	fibrous
76	forest gum	<i>E.tereticornis</i>	12	350	12	4200	smooth
77/78	paperbark	<i>M.quinquenervia</i>	10	250-250-350	12		fibrous, triple trunk {one tree}
79	clump of trees	4x forest gum, 2x paperbark	8	300	10	3600	both
80	bloodwood	<i>C.intermedia</i>	10	350	15	4200	fibrous

Note:

- #=tree number associated with plan (**ATTACHMENT C**)
- SPR = spread/canopy (m)
- DBH = diameter at breast height (mm)
- HGT = height (m)
- TPZ = tree protection zone (m) based on Australian Standards - 12 x DBH
- Bark Type = relates to bushfire management



6. Area for Clearing, Tree Retention and Removal

The area for the facility (and vegetation to be cleared) is **not** (refer **PHOTO PLATES, EXTRACTS 1-4** and aerial photograph in **ATTACHMENT A**) in the following areas/features **nor does it interfere** with these values:

- State Remnant Vegetation
- State Waterway/Watercourse
- State Wetland
- State Essential Habitat
- Council Wetland (note: the facility and associated land **is within a buffer area**)
- Council Vegetation and Wildlife Habitat

In addition, the onsite/ground-truthed inspection confirms these values/features do not occur at the location of the facility with no impact anticipated. Best practice vegetation management measures are recommended in **Section 7**.

While the values described herein and above are to be avoided, individual trees are required to be removed for the facility.

The site inspection and identification of species (with bark type, i.e. smooth or fibrous), review of bushfire issues (i.e. risk of fire, clearing requires in the asset protection zone, i.e. APZ), consideration of the construction and operational requirements for the facility and my assessment of ecological values (i.e. individual trees and clumps of bushland/patches) I provided recommendations for tree retention vs removal. An **extract** of the bushfire APZ requirements is provided below:

<p>The APZ should be maintained to a suitable standard, of which an example is provided below:</p> <ul style="list-style-type: none"> • Trees <ul style="list-style-type: none"> ○ Tree canopy cover should be less than 15% at maturity; ○ Trees at maturity should not touch or overhang the structure; ○ Lower limbs should be removed up to a height of 2 m above the ground; ○ Tree canopies should be separated by 2 to 5 m; and ○ Preference should be given to smooth barked and evergreen trees. • Shrubs <ul style="list-style-type: none"> ○ Create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided; ○ Shrubs should not be located under trees; ○ Shrubs should not form more than 10% ground cover; and ○ Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation; • Grass <ul style="list-style-type: none"> ○ Grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and ○ Leaves and vegetation debris should be removed.
<p>Extract 5. APZ requirements {source: Ecological Bushfire Reporting, 2024}</p>

The tree retention included a priority (from an ecological perspective) for the retention of mature eucalypt species, retention of clumps of trees and a greater setback to the State and Council mapped vegetation to the north. Values of greater ecological significance have been avoided, while clearing is kept to a minimum to allow safe construction and operation of the facility.

Table 3 and the associated plan in **ATTACHMENT D1** identifies the trees for removal. As noted, tree removal is limited to trees of lesser value, higher fire risk (10m APZ as recommended by bushfire consultants) and risk of interference with the operation of the facility. **Seven trees are required to be removed** (denoted in the table and **bolded**). These comprise six bloodwoods and one paperbark (see photos of individual trees in **ATTACHMENT D2**). Clearing is considered necessary because tree canopies overlap, and these are all identified as “fibrous” bark species for bushfire risk purposes.

While some of the trees may be considered semi-mature, none of the trees to be removed support obvious habitat features or significant ecological values.



Table 3. Tree removal and retention schedule

#	COMMON NAME	SCIENTIFIC NAME	STATUS	COMMENTS
57	bloodwood	<i>C.intermedia</i>	RETAIN	
58	bloodwood	<i>C.intermedia</i>	RETAIN	
59	paperbark	<i>M.quinquenervia</i>	RETAIN	
60	bloodwood	<i>C.intermedia</i>	REMOVE	APZ area
61	bloodwood	<i>C.intermedia</i>	RETAIN	
62	bloodwood	<i>C.intermedia</i>	REMOVE	APZ area
63	bloodwood	<i>C.intermedia</i>	REMOVE	APZ area, some canopy over compound
64	bloodwood	<i>C.intermedia</i>	REMOVE	APZ area, canopy over compound
65	paperbark	<i>M.quinquenervia</i>	RETAIN	
66	forest gum	<i>E.tereticornis</i>	RETAIN	
67	bloodwood	<i>C.intermedia</i>	REMOVE	Tree in compound area, canopies overlap
68	paperbark	<i>M.quinquenervia</i>	RETAIN	
69	paperbark	<i>M.quinquenervia</i>	REMOVE	APZ area
70	forest gum	<i>E.tereticornis</i>	RETAIN	
71/72	clump of trees	2x peppermint, 2x paperbark, 1x forest gum	RETAIN	
73	forest gum	<i>E.tereticornis</i>	RETAIN	
74	forest gum	<i>E.tereticornis</i>	RETAIN	
75	bloodwood	<i>C.intermedia</i>	REMOVE	APZ area, some canopy over compound
76	forest gum	<i>E.tereticornis</i>	RETAIN	
77/78	paperbark	<i>M.quinquenervia</i>	RETAIN	triple trunk (one tree)
79	clump of trees	4x forest gum, 2x paperbark	RETAIN	
80	bloodwood	<i>C.intermedia</i>	RETAIN	not on plot, 4m SW of #57

Note:

- refer **Table 2** for tree dimensions
- refer plans for trees to be removed in **ATTACHMENT D1** and photos of individual trees in **ATTACHMENT D2**

7. Site Management (Fauna and Vegetation) Plan

Best practice (and standard) site management is required during the vegetation clearing and construction process. Refer Plan in **ATTACHMENT D** for trees to be removed and other management requirements. This would be expected to be a condition of approval. Management measures (ecological) are to include the following:

Prior to any clearing/machinery on site

- Site ecologist to clearly identify/mark trees for retention vs removal.
- Tree/vegetation protection fencing to be installed (see indicative location on plan in **ATTACHMENT D1**).
- Preclearing inspection for fauna by ecologist/spotter catcher.

During clearing

- Spotter catcher on site during vegetation clearing.
- Vegetation clearing (trees) to be undertaken in a direction to allow potential fauna to escape into the bush (i.e. clear towards north/west) - (see indicative location on plan in **ATTACHMENT D1**).
- Tree felling/clearing to be done by experienced contractor and avoid damage to retained trees/vegetation.
- All trees/vegetation to be cleared in single day (alternatively repeat process above for consecutive days in the event fauna return to trees).



8. Environmental Management and Conservation Zone

While this would be a matter for the planners, the prelodgement minutes reflect that the zone code allows low intensity development on sites with the *Environmental Management and Conservation Zone* that do not impact on the environmental values of the site.

Council requested that the purpose and outcomes of the zone be addressed. Relevant extracts⁷ provided below.

The **purpose** of the Environmental Management and Conservation Zone is to provide for the protection and maintenance of areas that support one or more of the following:-

- a) *biological diversity;*
- b) *ecological integrity*
- c) *naturally occurring landforms; and*
- d) *coastal processes.*

The purpose of the Environmental Management and Conservation Zone code will be achieved through the following **overall outcomes**:-

- a) *areas identified as having significant natural environmental values for biological diversity, water catchment, ecological functioning, beach protection or coastal management, and historical or cultural significance are:-*
 - i. *protected for their importance in contributing to ecological sustainability; and*
 - ii. *appropriately managed to the general exclusion of most forms of development;*
- b) *development is of a low-intensity and is designed and sited to ensure that it does not impact on the environmental values of the site;*
- c) *activities that do not compromise the values of the area, such as ecotourism and outdoor recreation, are facilitated where a demonstrated community need exists;*
- d) *low intensity development, providing for appreciation of the significant values of the area, may be facilitated where a demonstrated community need exists and such development is consistent with the management intent or plan for the area;*
- e) *development maintains the scenic values and landscape character of the zone, particularly prominent ridgelines, escarpments, significant landmarks, and coastal views and vistas;*
- f) *development does not adversely impact on the continued safe operation, viability and maintenance of existing infrastructure or compromise the future provision of planned infrastructure; and*
- g) *development preserves, protects and rehabilitates land to maintain biodiversity, ecological processes, water quality, landscape character, scenic amenity, cultural heritage significance and community wellbeing.*

The key outcome (ecological) for this zone is the protection of significant environmental values. While many overall outcomes relate to other technical areas (e.g. need, visual, infrastructure), the subject land and location of the proposed facility will not, in my opinion, interfere with ridgelines, landmarks or scenic vistas.

The land is primarily maintained with a cleared groundcover and no midstorey (presumably as bushfire setback for residential areas to the south), essentially serving as a buffer between the dense bushland (remnant vegetation) and residential areas.

Loss of ecology values is restricted to the native trees identified in **Table 3 (Section 6)**.

Significant environmental values, including remnant vegetation, wetland areas, corridors, wildlife habitat are primarily to the north of the subject land. A small, mapped area encroaches into the northern portion of the site. Neither the values on site nor to the north will be impacted. In addition, the ground-truthing exercise has identified trees/clumps of trees for retention ensuring the construction and operation of the facility only causes the minimum ecological impact possible.

⁷ Fraser Coast Planning Scheme V11 S6.2.14.



9. Residual Impact Mitigation

As identified in **Section 6** (refer **Table 3**) for the project to be established and operated, seven native trees will need to be removed. The ground-truthing exercise and adjustments for bushfire management have allowed the more valuable vegetation to the north to be retained. The clearing of seven native trees is necessary to ensure safe operation of the facility, allows for a small construction and laydown area and requires tree removal for bushfire management (because trees have fibrous bark and canopies that overlap).

No vegetation or trees to be removed are within a State or Local Government mapped area, i.e. there is no formal trigger for an offset. However, it is understood that the landowner (Council) has indicated that the residual impact (i.e. tree loss) be addressed through the State environmental offset policy.

As such, a financial offset calculation has been undertaken for the loss of seven native trees. The trees are mostly 300mm diameter with a 225mm and a 500mm tree being the extreme size classes. While there is no specific area of impact, the koala habitat (noting these trees are all koala habitat trees by definition) tree value is based on a single tree being 40m². As such, seven trees means an area of 280m² is impacted.

ATTACHMENT E has two sets of financial calculations using the State offset calculator. The first is based upon 280m² of koala habitat (matter group) to be lost and the second is using the same area of MLES3 (a “matter group” regularly used by local governments) to be removed.

As such, based on the calculations in the attachment, a financial contribution of \$2637.52 is required to offset/compensate for the loss of seven koala habitat trees. However, when using the same impact area, a financial contribution of \$12100.00 is required to offset/compensate for the loss of 280m² MLES3. The offset arrangement would be a condition of approval as agreed with Council.

10. Conclusion

The proposed project is for a Telstra Telecommunications facility which includes a fenced compound and tower. An area within and surrounding the facility needs to be managed as an asset protection zone (for bushfire purposes).

A ground-truthing exercise has identified the local vegetation (trees) and following amendments to the APZ and facility only seven native trees need to be removed to allow for construction and safe ongoing operation. The more intact and vegetation of greater ecological significance, which is mapped (and some not mapped) by the State and Local Government, will be retained.

A tree retention plan, vegetation and fauna management measures have been provided and can be conditions of approval. An offset for the loss of the seven native trees could be addressed by way of financial contribution to Council (as per the State Environmental Offset Policy). This would also be a condition of approval.

With regards to ecology matters, noting the current land use and values and location/design of the facility, the intent (purpose and outcomes) of the Environmental Management and Conservation Zone will not, in my opinion, be compromised. Noting the recommendations herein, there would be no ecological reason why the project could not be approved with reasonable and relevant conditions.

Please do not hesitate to give me a call on 0407 410 099 if you need to discuss further.



Kind regards

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

Justin Watson (PhD; CEnvP.)
Director/Principal Ecologist
Gondwana Ecology Group

cc. **Pola Lee**, Queensland SAED Project Manager

Encl.

- ATTACHMENT A – Subject Land (QLD Globe)
- ATTACHMENT B – Proposed Project (Service Stream)
- ATTACHMENT C – Tree Survey (extract from Service Stream Plans)
- ATTACHMENT D1 – Vegetation Management Plan/Tree Removal Plan (Gondwana Ecology Group/Service Stream)
- ATTACHMENT D2 – Photos of Individual Trees to be Removed (Gondwana Ecology Group)
- ATTACHMENT E – Offset Calculation (Gondwana Ecology Group/State)
- PHOTO PLATES – GENERAL (Gondwana Ecology Group)



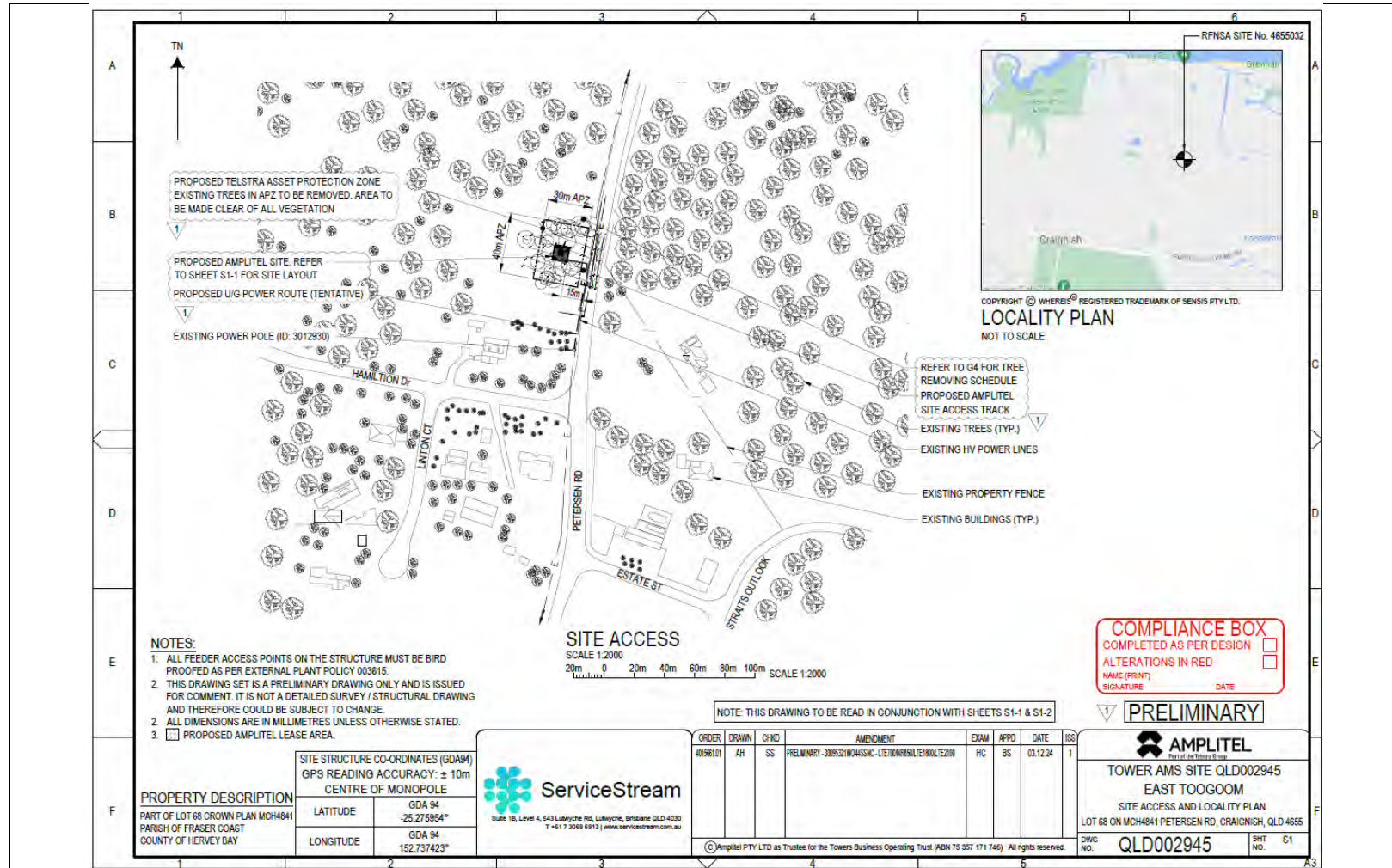
ATTACHMENT A – SUBJECT AREA



Source: QLD GLOBE, 2024.
Proposed facility location indicated by "yellow polygon"



ATTACHMENT B – PROPOSED PROJECT

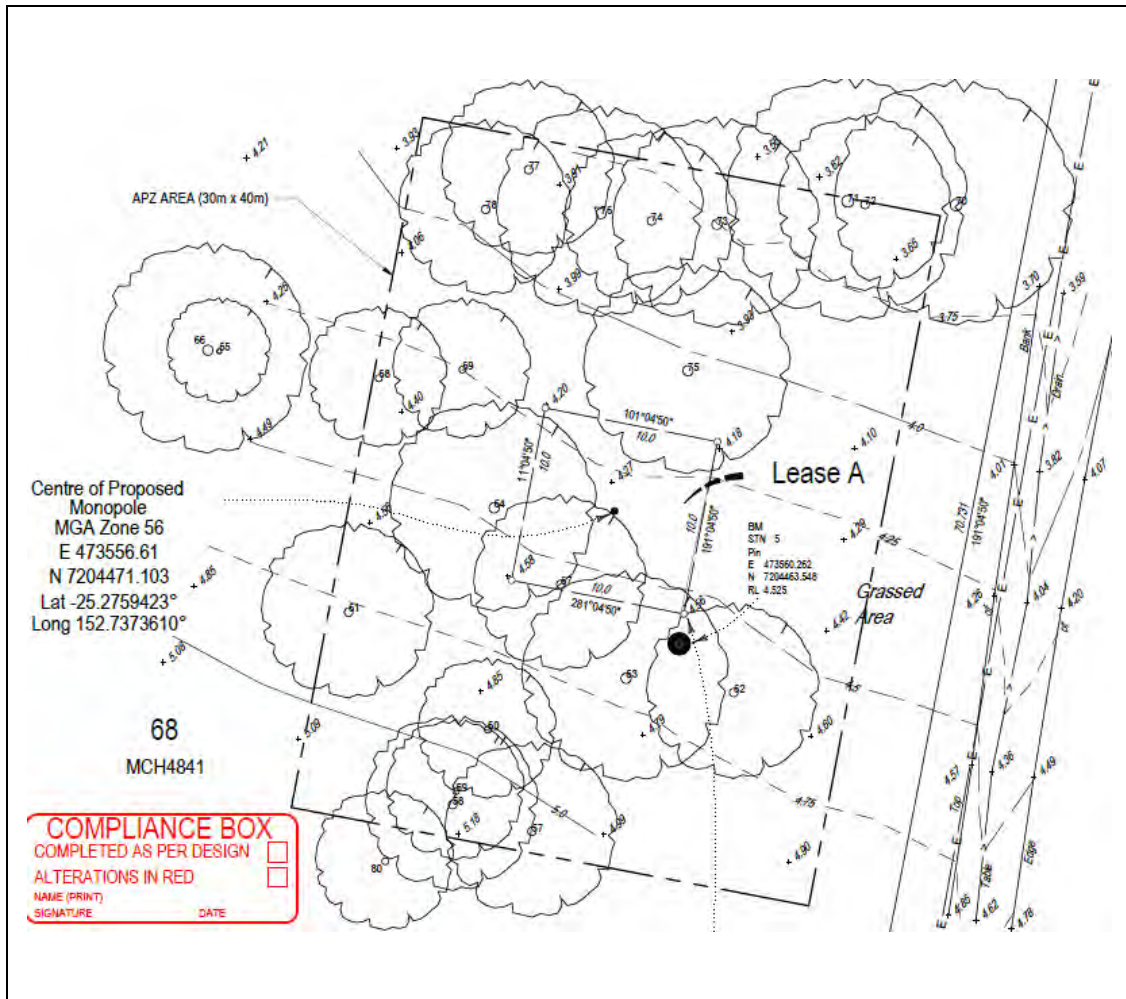


Source: Service Stream {refer other reports for original plans}



ATTACHMENT C – TREE SURVEY {Extract}

- See **ATTACHMENT D** for further details and **TABLE 3** in report



Source: Service Stream {refer other reports for original plans, see detailed plan in **ATTACHMENT D1**}



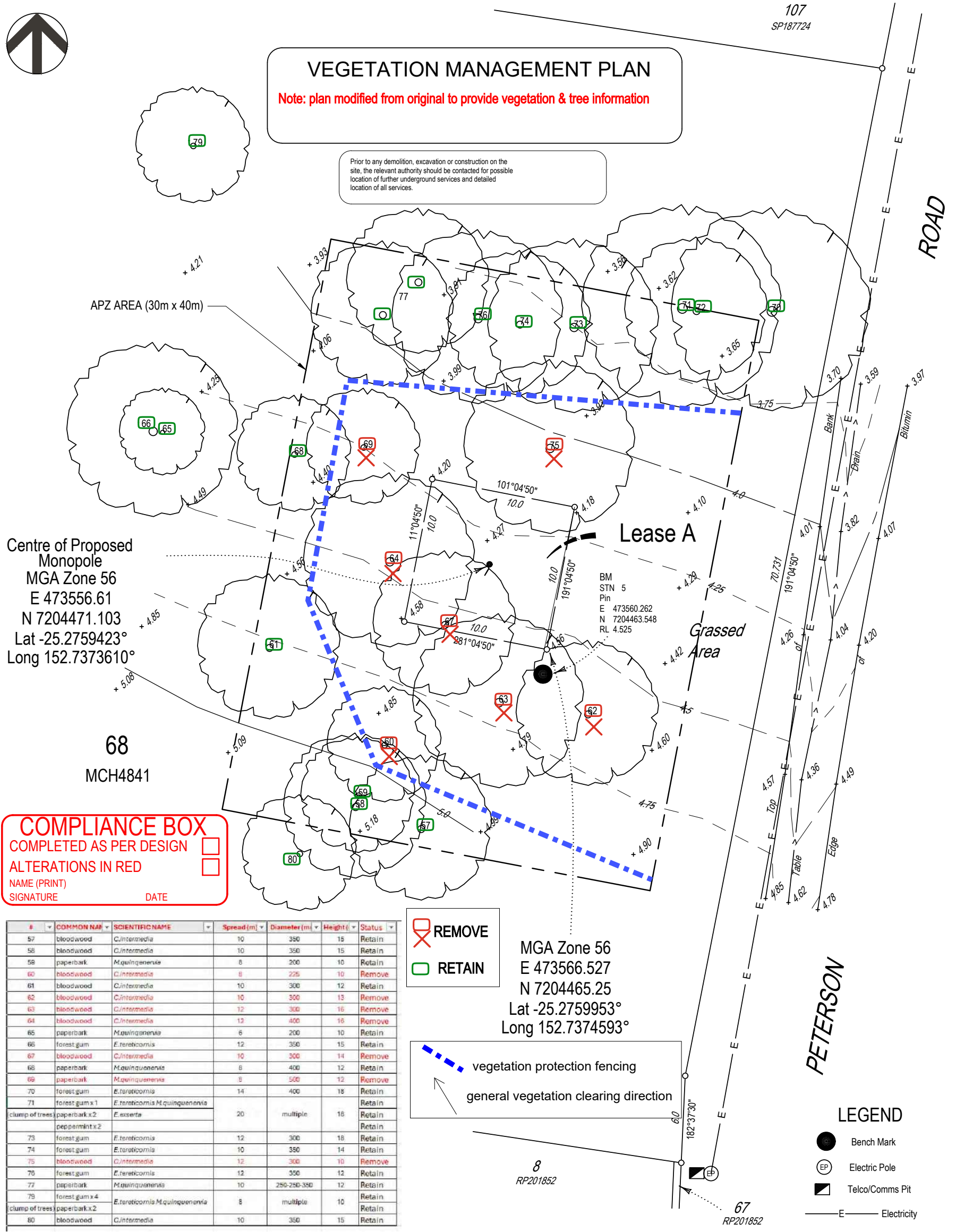
ATTACHMENT D1 – VEGETATION MANAGEMENT PLAN/TREE REMOVAL PLAN



VEGETATION MANAGEMENT PLAN

Note: plan modified from original to provide vegetation & tree information

Prior to any demolition, excavation or construction on the site, the relevant authority should be contacted for possible location of further underground services and detailed location of all services.





ATTACHMENT D2 - TREES TO BE REMOVED – PHOTOS (refer plan in ATTACHMENT D1)



View west (survey pegs identify compound) - Trees to be removed – from right #75, #69, #64, #67, #60, #63, #62



Tree 75



Tree 63



Tree 69



Tree 64



Tree 60



Tree 67



Tree 62

**PHOTO PLATES - GENERAL**

Photo 1. View north-west. Facility location denoted by survey pegs in centre. Bloodwood trees in centre (#62 and #63) to be removed.



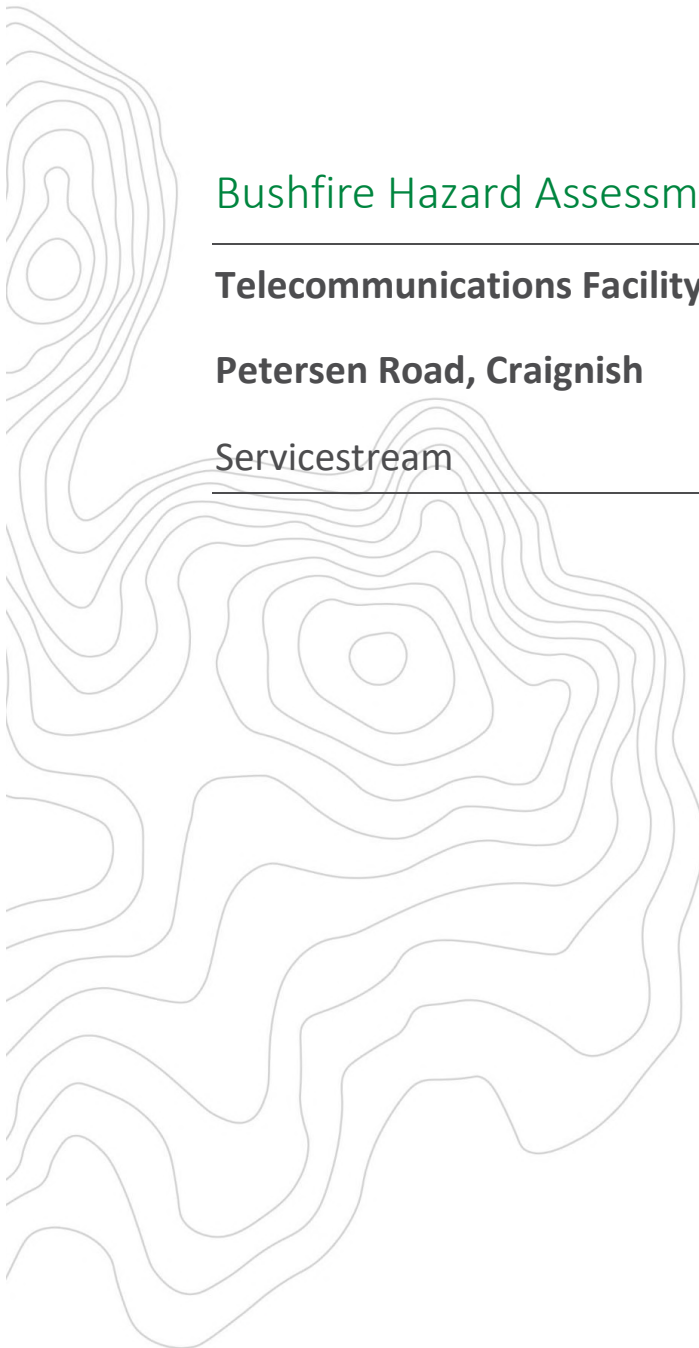
Photo 2. View south towards residential area. Facility location denoted by four survey pegs. Bloodwood #75 in foreground to be removed.



Photo 3. View north-east. Facility boundary peg to right. Row of trees in distance (#70, #71, #72, #73, #74, #76, #77/78) to be retained. Bloodwood in centre (#75) to be removed.



Photo 4. View north. Intact (remnant?) vegetation to the north to be retained.



Bushfire Hazard Assessment and Management Plan

Telecommunications Facility

Petersen Road, Craignish

Servicestream



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www.ecoaus.com.au

DOCUMENT TRACKING

Project Name	Bushfire Hazard Assessment and Management Plan – Telecommunications Facility – Petersen Road, Craignish
Project Number	24SYD8616
Project Manager	Bruce Horkings – Principal Bushfire Consultant and Technical Lead
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Reviewed by	Bruce Horkings (FPAA BPAD Accredited Practitioner No. BPAD29962-L3)
Approved by	Bruce Horkings (FPAA BPAD Accredited Practitioner No. BPAD29962-L3)
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LIMITATIONS

The bushfire protection measures recommended in this report do not completely remove the risk to life and property, and they do not guarantee that a development will not be impacted by a bushfire event. This is substantially due to the degree of vegetation management, the unpredictable nature and behaviour of fire, and extreme weather conditions.

ACKNOWLEDGEMENTS

This document has been prepared by Eco Logical Australia Pty Ltd with support from Servicestream.

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Template 2.1.4

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Abbreviations

Abbreviation	Description
AS 3959	Australian Standard AS 3959:2018 Construction of buildings in bushfire-prone areas
AO	Acceptable outcome
APZ	Asset Protection Zone
BAL	Bushfire Attack Level
BFAA	NBC Bush Fire Attack Assessor
BHA	Bushfire Hazard Assessment
BMP	Bushfire Management Plan
BPA	Bushfire Prone Area
BPM	Bushfire Protection Measures
CoW	Cell on Wheels
EWP	Elevated Work Platform
FFDI	Forest Fire Danger Index
FCRC	Fraser Coast Regional Council
NASH	National Association of Steel-framed Housing
NBC	Newcastle Bushfire Consulting
OCU	Outdoor cabinet unit
PO	Performance outcome
QFD	Queensland Fire Department (formerly known as QFES)
QFES	Queensland Fire and Emergency Services (now known as QFD)
RHF	Radiant heat flux
SA	Standards Australia
VHC	Vegetation Hazard Class

1. Property and Proposal

Table 1 identifies the subject property and outlines the type of development proposed.

Table 1: Subject site and development proposal summary

Street address:	Petersen Road, Craignish
Postcode:	4655
Lot and Plan:	Lot 68 MCH4841
Local Government Area:	Fraser Coast Regional Council
Zones:	Environmental management and conservation zone.
Overlay Maps:	OM-001-ASS-Area 1-Land at or below 5mAHD OM-001-ASS-Area 2-Land above 5m & below 20mAHD OM-004(B)-MSES Reg Veg-Essential Habitat OM-004(B)-MSES Reg Veg-Wetland with 100m buffer OM-004(B)-MSES Wildlife Habitat OM-004(B)-Other remnant vegetation OM-004(W)-Local wetland OM-004(W)-Local wetland buffer OM-004(W)-MSES High ecological significance wetland OM-005-Bushfire hazard potential impact buffer OM-005-Bushfire prone areaOM-005-High bushfire hazard area OM-005-Medium bushfire hazard area OM-006-High hazard storm tide OM-006-Medium hazard storm tide OM-008-Flood hazard area
Proposed development:	Telecommunications Facility.

1.1 Description of Proposal

The proposal is for the construction of a telecommunications facility located in Craignish (Figure 1) consisting of the following key components (Figure 2):

- 30 m concrete monopole;
- Outdoor cabinet unit (ODU);
- Compound area of 10 m x 10 m; and
- Underground power supply.

The overall site is mapped as High Potential Bushfire Intensity, Medium Potential Bushfire Intensity and Potential Impact Buffer whilst the proposed facility is located only within the Potential Impact Buffer (Figure 3) area. Based on this mapping, the proposal is required to respond to bushfire specific requirements identified in the Fraser Coast Regional Council (FCRC) Planning Scheme, including the Bushfire Hazard Overlay Code (FCRC 2024).

This assessment has been prepared by Eco Logical Australia (ELA) Bushfire Consultant, Natalie South (FPAA BPAD Level 2 Certified Practitioner No. BPAD41212) and Principal Bushfire Consultant and

Technical Lead, Bruce Horkings (FPAA BPAD Level 3 Certified Practitioner No. BPAD29962). Both Bruce and Natalie are recognised as qualified bushfire consultants in bushfire risk assessment. ELA Ecologist, Ella Horton, undertook the site inspection on 4 September 2024.

1.2 Assessment Process

The proposal was assessed with consideration of the following requirements, specifications and information sources:

- Fraser Coast Regional Council – *Planning Scheme 2014 Version 11 – 8.2.5 Bushfire hazard overlay code*;
- Fraser Coast Regional Council – *Planning Scheme 2014 Version 11 – SC6.4 Planning scheme policy for information that the Council may require (SC6.4.4 Bushfire hazard assessment report and management plan)*;
- Queensland Fire and Emergency Services (QFES) Bushfire Resilient Communities Technical Reference Guide for the State Planning Policy State Interest ‘Natural Hazard, Risk and Resilience – Bushfire’ (QFES 2019), herein referred to as the ‘Guide’.
- Background documentation provided by Servicestream, including detailed site plan (Appendix A);
- GIS analysis including online spatial resources (i.e. Google Earth, Nearmap, Fraser Coast Regional Council’s online mapping and the QLD Government Open Data Portal); and
- Site inspection undertaken 4 September 2024.

A summary of the proposed development against the Performance Outcomes and Acceptable Outcomes is provided in below.

Table 2: Performance and Acceptable Outcome Compliance Summary

Bushfire Management Measures	Performance Outcome	Acceptable Outcome	Not Applicable	Report Section
PO1: Bushfire Hazard Assessment and Management		<input checked="" type="checkbox"/>		3.2
PO2: Safety of People and Property			<input checked="" type="checkbox"/>	3.3
PO3: Community Infrastructure		<input checked="" type="checkbox"/>		3.4
PO4: Hazardous Materials			<input checked="" type="checkbox"/>	3.5
PO5: Access and Evacuation Routes			<input checked="" type="checkbox"/>	3.6
PO6: Fire Breaking Trails	<input checked="" type="checkbox"/>			3.7
PO7: Lot Layout			<input checked="" type="checkbox"/>	3.8
PO8: Building, Siting, Desing and Construction		<input checked="" type="checkbox"/>		3.9
PO9: Water Supply for Fire Fighting Purposes	<input checked="" type="checkbox"/>			3.10

1.3 Stakeholder Consultation

As identified within the SC6.4 Planning Scheme policy (FCRC 2024), and as the facility is located on land managed by Council, internal consultation should occur with regard to this proposal and the bushfire hazard assessment approach, and the set of mitigation measures proposed.



Figure 1: Locality



Figure 2: Site Overview

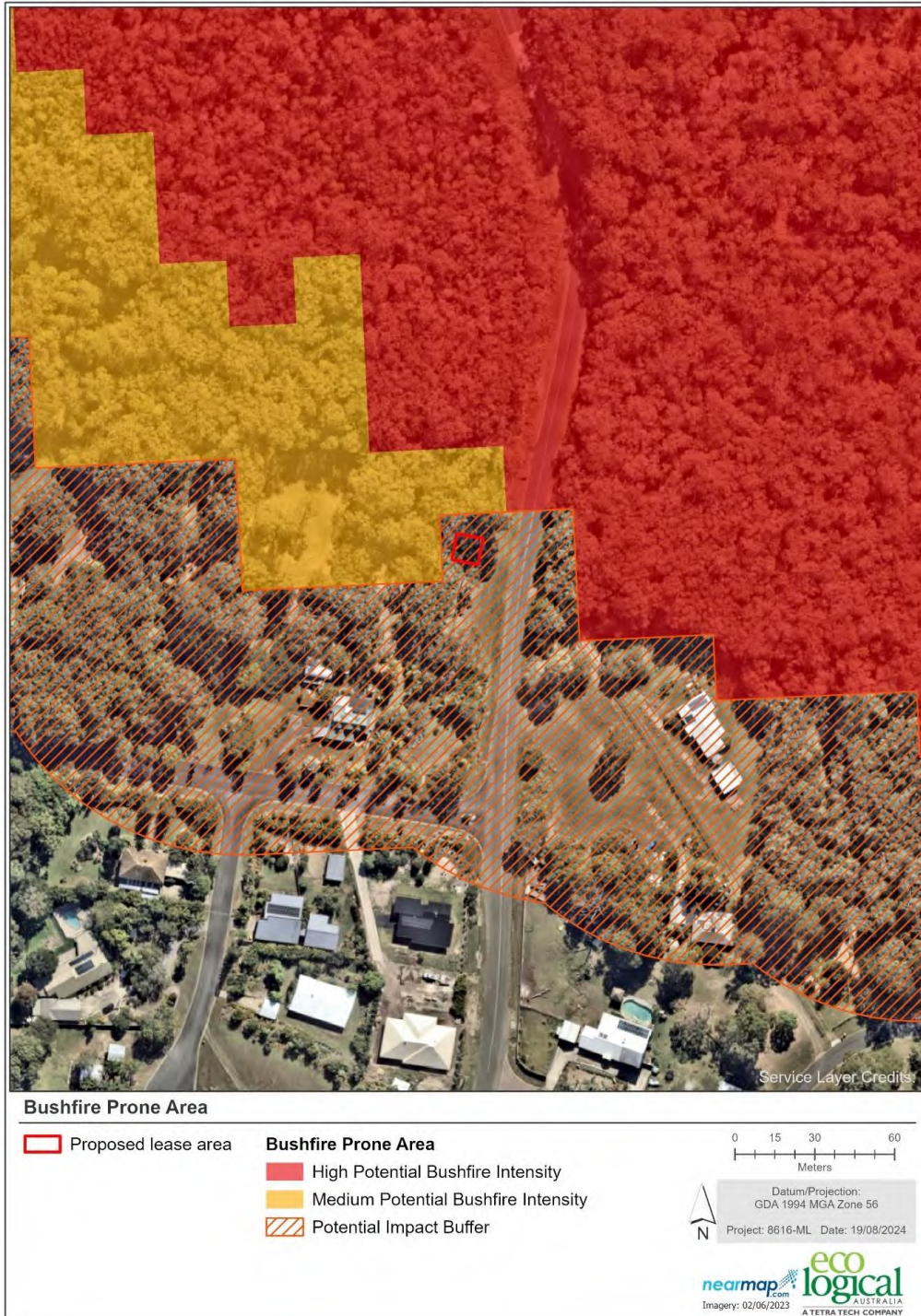


Figure 3: Bushfire Prone Area mapping (FCRC 2024)

2. Bushfire Hazard Assessment

2.1 Process

The assessment methodology from Section's 5 to 7 of the Guide (QFES 2019) has been applied in this site-specific Bushfire Hazard Assessment (BHA) to determine the required inputs and calculated outputs including radiant heat flux (RHF) exposure to the proposed development.

The Guide (QFES 2019) and associated State Planning Policy guidance documentation has been used in lieu of the superseded state planning guidelines document nominated in the current FCRC planning Scheme (FCRC 2024).

The BHA was undertaken in three stages as per the Guide and being:

1. Reliability assessment
 - a. Confirm Bushfire Prone Area (BPA) status and map input data.
2. Hazard assessment
 - a. Determine relevant map inputs from *Bushfire hazard area - Bushfire prone area - inputs – Queensland* dataset (QFES 2021).
 - b. Site assessment to confirm mapped data for 150 m around proposed development.
3. Separation and radiant heat exposure
 - a. Radiant heat exposure calculated based on available Asset Protection Zone (APZ) using Method 2 of AS 3959:2018 *Construction of buildings in bushfire-prone areas* (SA 2018).

To simplify the assessment process and corresponding results, several steps have been combined, and only the relevant processes undertaken.

2.2 Reliability Assessment

The reliability assessment is twofold in that the site assessment considers the accuracy of both the BPA mapping and the relevant inputs to be incorporated in the hazard assessment stage that are sourced from the state dataset (QFES 2021).

2.2.1 Bushfire Prone Area mapping

The BPA mapping (Figure 3) is considered reasonably accurate based on both an assessment of current aerial imagery and the on-ground assessment. The site is mapped as located within the Potential Impact Buffer but is on the cusp of the Medium Potential Bushfire Intensity area.

The BPA mapping has not been updated as it does not change the outcome of the proposed development.

2.2.2 Vegetation and Slope Inputs

The identified Vegetation Hazard Class (VHC) from the bushfire prone area input dataset (QFES 2021), was considered generally consistent with what was mapped across site and surrounds with some variation of the extent of VHC 9.2 and 22.1.

The slope data from the bushfire prone area input dataset (QFES 2021), was considered generally consistent with what was mapped.

Figure 4 is the mapped dataset and Figure 5 shows the mapping refined from the site assessment for 150 m around the proposed development.

2.3 Hazard Assessment

The hazard assessment is undertaken in line with the Guide (QFES 2019) with the required data sourced from the input dataset (QFES 2021) and confirmed during the site inspection. The three key inputs determined are the fire weather severity, VHC and effective/site slope.

2.3.1 Fire Weather Severity

The fire weather severity is represented by the Forest Fire Danger Index (FFDI) which value is determined by analysing the bushfire prone area input dataset (QFES 2021), which identified the applicable FFDI for the site is 48.

2.3.2 VHC

The site assessment reviewed the VHC mapping within 150 m surrounding the proposed development and identified some variations in extents of individual VHC across the assessment area in comparison to that of the bushfire prone area input dataset (QFES 2021). This variation in extent was not considered significant.

Analysis of the mapped VHC (2021) identified the following as being present within 150 m of the proposed development (Figure 4):

- 5.1 Notophyll to microphyll vine forests
- 9.2 Moist to dry eucalypt woodland on coastal lowlands and ranges
- 10.1 Spotted gum dominated open forests
- 22.1 Melaleuca open forests on seasonally inundated lowland coastal swamps
- 39.2 Low to moderate tree cover in built-up areas
- 41.4 Low grass or tree cover in built-up areas

Upon site inspection, the VHC mapping was refined (Figure 5) and the below list (Table 3) is what was identified within the 150 m assessment area and the associated fuel loads.

Table 3: VHC present on site and associated fuel loads (QFES 2019b)

VHC		Potential Surface + Near-surface Fuel Loads (t/ha)	Potential Overall Fuel Loads (t/ha)
4.1	Notophyll and notophyll palm or vine forest	4.5 + 0 = 4.5	4.5/12
5.1	Notophyll to microphyll vine forests	3.9 + 0 = 3.9	3.9/12
9.2	Moist to dry eucalypt woodland on coastal lowlands and ranges	11.4 + 3.5 = 14.9	17.2
22.1	Melaleuca open forests on seasonally inundated lowland coastal swamps	15.4 + 8 = 23.4	28.4
41.4	Low grass or tree cover in built-up areas	0.5 + 2 = 2.5	3

2.3.3 Slope Assessment

The site inspection and review of 5 m contour data identified that the slope data within the bushfire prone area input dataset (QFES 2021) was generally consistent with that mapped. The effective and site slope values have been assessed from 1 m contour data and confirmed during site inspection for each identified transect. The slope information is shown on the BHA figure (Figure 5) and in Table 4.

Although the maximum slope in the dataset is 5° upslope to the south and 2° downslope to the north (QFES 2021), in accordance with AS 3959:2018 (SA 2018), the slope that would most significantly influence fire behaviour was determined over a distance of at least 100 m from the proposed development under the classified vegetation using 1 m contour data. This found minor variations in the slope as documented in Figure 5 and Table 4.

2.4 Radiant Heat Exposure

2.4.1 Method

The Newcastle Bushfire Consulting (NBC) Bushfire Attack Assessor (BFAA) was used to determine the radiant heat flux exposure and corresponding Bushfire Attack Level (BAL). This approach is in accordance with Appendix B: Detailed Methodology for Determining the Bushfire Attack Level (BAL) – Method 2 of ‘Australian Standard 3959: Construction of buildings in bushfire-prone areas’ (SA 2018).

The BFAA tool is a custom software application designed by NBC in Microsoft Access and regularly used in the bushfire industry for undertaking a range of bushfire modelling utilising AS 3959 as the base. As outlined in CB3 of Appendix B of AS 3959:2018 a vegetation classification system specific to a relevant State or accepted as an alternate to the national system. This assessment utilises the fuel loadings for the identified VHC as detailed in the Guide (QFES 2019).

2.4.2 Results and Discussion

Table 4 below summarises the site-specific inputs used for each transect in the BHA and the corresponding RHF exposure and BAL rating. The detailed results of this assessment are shown in Appendix B.

As illustrated in Table 4, the proposed facility is exposed to BAL-40 on all elevations with a 10 m separation (APZ). The roadside (Petersen Road) has been included in the APZ for the eastern elevation. The 10 m APZ should be fully provided where feasible, but this assessment recognises the proposed facility is not considered ‘critical’ by the proponent. This is addressed further in Section 3.9.1.

Table 4: Bushfire Hazard Assessment and Results

Transect #	FFDI	Flame Temp. (K)	Slope		VHC #	AS 3959 Vegetation Group	Fuel Loads (t/ha)		Proposed APZ (m)	Radiant Heat Exposure	
			Effective	Site			Potential Surface + Near-surface	Potential Overall		Radiant Heat Flux (kW/m ²)	Bushfire Attack Level (BAL)
1 (North)	48	1200	1° downslope	1° downslope	9.2	Forest/Woodland	11.4 + 3.5 = 14.9	17.2	≥10	39.02	BAL-40
2 (East)	48	1200	1° downslope	1° downslope	22.1	Forest/Woodland	15.4 + 8 = 23.4	28.4	≥16*	37.8	BAL-40
3 (South)	48	1200	3° upslope	1° downslope	9.2	Forest/Woodland	11.4 + 3.5 = 14.9	17.2	≥10	31.97	BAL-40
4 (West)	48	1200	1° upslope	1° downslope	9.2	Forest/Woodland	11.4 + 3.5 = 14.9	17.2	≥10	35.25	BAL-40

* Includes adjoining road (Petersen Road).

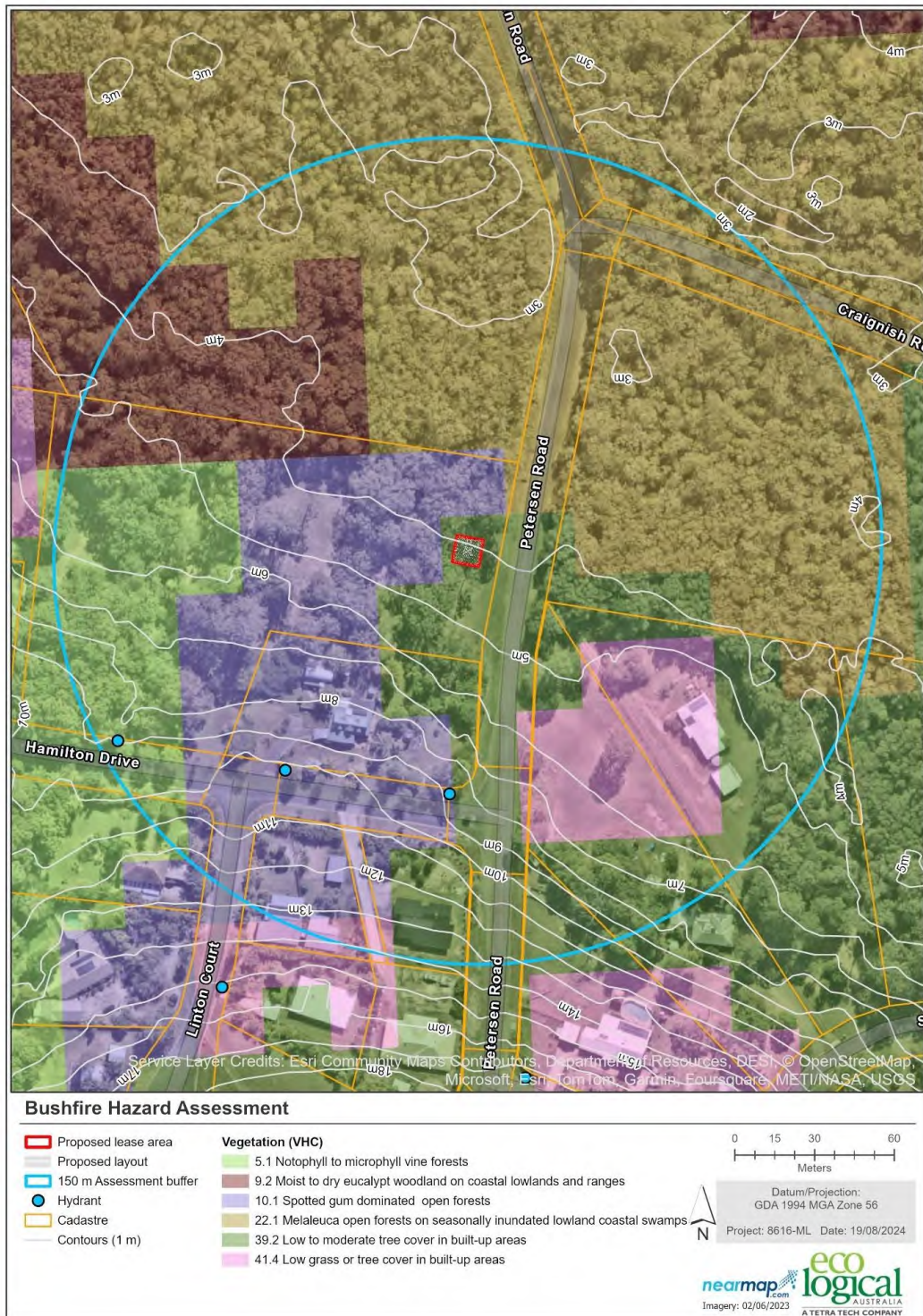


Figure 4: Bushfire hazard assessment with mapped VHC

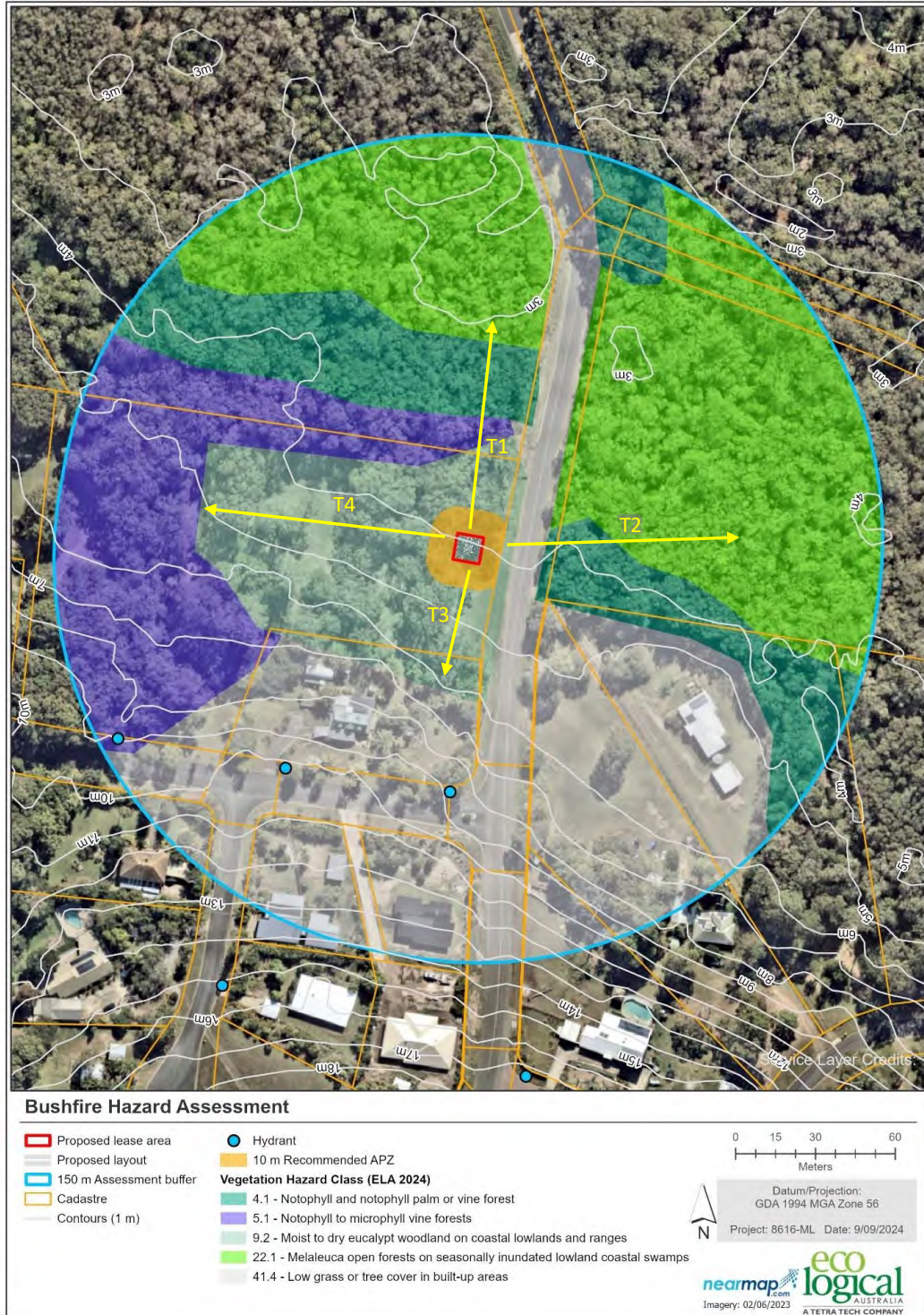


Figure 5: Bushfire hazard assessment with ground-truthed VHC

3. Bushfire Management Plan

3.1 Introduction

This report and the associated Bushfire Hazard Assessment (BHA) and the Bushfire Management Plan (BMP) has been written with consideration of both the Fraser Coast Regional Council's Planning Scheme (FCRC 2024) including the *Bushfire hazard overlay code* (8.2.5), *Planning scheme policy* (SC6.4) and the more recent Queensland Fire Department (QFD) guidelines (QFES 2019) for assessing bushfire risk.

The below sections examine and address specific responses to each applicable performance outcome (PO) and identifies if the acceptable outcome (AO) have been achieved or whether the PO has been directly addressed.

3.2 PO1: Bushfire Hazard Assessment and Management

AO1.1 is Achieved.

A site-specific BHA has been undertaken and the level of bushfire hazard in comparison to the bushfire hazard overlay map (Figure 4 and Figure 5) has been confirmed. This has been done in accordance with SC6.4 – *Planning scheme policy for information that the Council may require*, specially SC6.4.4 and discussed further in Section 2. The response to AO1.2 addressed the BMP aspect.

AO1.2 is Achieved, subject to approval of this report which includes a Bushfire Hazard Assessment (BHA) and a Bushfire Management Plan (BMP).

The development is to comply with the provided responses recorded in this BMP which has been developed using SC6.4 – *Planning scheme policy for information that the Council may require*, specially SC6.4.4, as a guide.

The bushfire hazard assessment in Section 2 of this report identifies the bushfire hazard response of the site whilst the BMP identifies the holistic bushfire mitigation measures proposed that addresses not only the bushfire risk but that of the development type (telecommunications facility) and minimising vegetation impacts.

3.3 PO2: Safety of People and Property

AO2.1 is Not Applicable

Proposed telecommunications facility is not in the identified use list.

AO2.2 is Not Applicable

Proposed telecommunications facility does not create a greater concentration of people living or congregating in bushfire hazards areas, as it is an unoccupied facility.

3.4 PO3: Community Infrastructure

AO3 is Achieved

The proposed development is a telecommunications facility (Appendix A) and is located within the bushfire hazard area (Figure 3). This facility is not considered essential community infrastructure (client identified) as its intended service is to provide general data capacity improvement to the surrounding area rather than address communication blackspots.

This BMP demonstrates that the design and proposed bushfire protection measures (BPM) provide a holistic approach in risk mitigation, given the site constraints and development type, to ensure the facility can function effectively during and immediately after a bushfire event. There is always a level of residual risk and no level of protection measures can reduce this risk, unless the facility is located in an area of significant distance from any bushfire hazard, which is not appropriate given the required location for the facility to provide effective service to the surrounding area.

Servicestream has identified the following factors in relation to this site (B. Hender pers. comm. 24 May 2024):

- There is currently Telstra coverage in the area provided by existing facilities in the surrounding area. The closest being 1.5km to the south at 366 Craignish Rd;
- The proposed facility is required primarily to provide increased data capacity and ensure indoor coverage to the residents in the immediate area of the facility.
- The facility would not be the sole provider of Telstra coverage in the area in the event of an emergency.
- Nearby facilities:
 - RFNSA 4655008 - 366 Craignish Rd CRAIGNISH QLD 4655. Approx. 1.5km south east 30.0m steel monopole.
 - RFNSA 4655001 - LOT 176 Plan 2982 TOOGOOM RD TAKURA QLD 4655. Approx. 6.5km east 60m steel lattice tower.
 - RFNSA 4655015 - Tooth Street PIALBA QLD 4655. Approx. 9.0km west 35.0m steel monopole.

Given the above and further to the other BPM identified in this BMP, further information and recommendations are made in Section 3.11 which include measures that address:

- Disaster mitigation and response;
- Construction;
- Backup power supply; and
- Additional portable coverage.

3.5 PO4: Hazardous Materials

PO4 is Not Applicable.

Proposed telecommunications facility does not involve the manufacture or storage of hazardous materials in bulk.

3.6 PO5: Access and Evacuation Routes

PO5 is Not Applicable.

Proposed facility will utilise the existing Amplitel site access track and no new public or private roads are proposed.

3.7 PO6: Fire Breaking Trails

PO6 is Achieved.

Proposed facility will utilise the existing Amplitel site access track and no new fire break trails are proposed. The proposal addresses the performance objective criteria in the following manner:

1. Adequate access for firefighting and other emergency vehicles is provided via the existing public road network as the site directly adjoins Peterson Road to the east.
2. Adequate evacuation of residents is not required to be addressed as the proposal is not for residential occupation. Alternative access cannot be provided due to the existing public road layout and existing residential development. Any planning for an emergency response would factor this legacy issue into any response including that the site is not considered critical for communications and there are alternative coverage options.
3. Separation from the facility to the adjacent hazard is provided by an APZ as identified in Section 3.9.1.

3.8 PO7: Lot Layout

PO7 is Not Applicable.

Proposed telecommunication facility does not involve any lot reconfiguration and is located within an existing Council land.

3.9 PO8: Building Siting, Design and Construction

AO8 is Achieved, subject to Council approval and compliance with this BMP.

The proposed structures (telecommunications facility) is to be designed and sited in accordance with this report (Bushfire Hazard Assessment and Bushfire Mitigation Plan).

3.9.1 APZ Standards

The lease area is to be managed to be 'free of surface and elevated fuel (grass and shrubs) with minimum canopy cover'. The proposed 10 m APZ (approx.) is recommended around the external perimeter of the lease area, to the fullest extent possible, in order to enhance the defensible space and further separation from the adjoining hazard. Ensuring the implementation and ongoing maintenance of this APZ is the responsibility of the infrastructure owner and a suitable agreement for this to occur is recommended to be secured from the landowner.

The APZ should be maintained to a suitable standard, of which an example is provided below:

- Trees
 - Tree canopy cover should be less than 15% at maturity;
 - Trees at maturity should not touch or overhang the structure;
 - Lower limbs should be removed up to a height of 2 m above the ground;
 - Tree canopies should be separated by 2 to 5 m; and
 - Preference should be given to smooth barked and evergreen trees.
- Shrubs
 - Create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided;
 - Shrubs should not be located under trees;
 - Shrubs should not form more than 10% ground cover; and
 - Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation;
- Grass
 - Grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
 - Leaves and vegetation debris should be removed.

3.9.2 Construction Standards

The design plan for proposed tower and equipment shelter is shown in Appendix A. The proposed development is required to incorporate the following design and construction measures:

- General:
 - All exposed cabling (including power supply) shall be completely shielded (e.g. steel pipe or steel enclosure) or will be provided underground then internal to structures.
- Telecommunication Tower:
 - Designed and constructed to withstand a minimum 40 kW/m² radiant heat.
- Equipment Shelter / Communications cabinet:
 - Designed to mitigate the risk of fuel build up (i.e. leaf material), flame damage, ember attack and radiant heat;
 - To be constructed to withstand a minimum 40 kW/m² radiant heat (i.e. equivalent to BAL-40);
 - Include ember protection measures including:
 - Vents, penetrations and weepholes (including fan penetrations) in external walls/doors, shall be screened with a mesh made of corrosion-resistant steel or bronze with a minimum aperture size of 2 mm; and
 - All doors shall be fitted with draught excluders/draught seals/weather strips to ensure fully sealing of opening.
- Bushfire specific construction measures can be found in AS 3959:2019 (SA 2018) and National Association of Steel Framed Housing (NASH) *Steel Framed Construction in Bush Fire Prone Areas NS 300* (NASH 2021).

3.10 PO9: Water Supply for Fire Fighting Purposes

PO9 is Achieved

The proposal does not include the provision of a water supply as the proposed facility location is within an existing public land site that is serviced by the reticulated water network. The nearest hydrant to the proposed facility is approximately 100 m to the south (located on Hamilton Drive). Figure 5 shows the approximate location of this hydrant.

Furthermore, no additional hydrants or water supplies are recommended as there are operational safety concerns for firefighters to defend the asset on ground during extreme fire conditions, given its location in the landscape, minimal defensible space, existing access, and surrounding bushfire hazard.

3.11 Additional Information

As identified in Section 3.3, to holistically address the bushfire risk, criticality of asset, and site constraints, the following observations and recommendations are made.

3.11.1 Disaster Mitigation and Response

Emergency response planning groups for the region (ie Local Disaster Management Group [LDMG]) should consider the non-critical nature of this site (client identified) in any planning and response for any communications infrastructure, including this site, and plan accordingly with regards to such factors as site risk, criticality, ability to operate during and after any natural hazard impact and associated mitigation measures.

3.11.2 Backup Power Supply

If the level of criticality of the site is increased in the future, it is recommended to improve any backup power supply capacity and consideration be given to:

- Provide a backup power supply capacity, ideally a minimum of 24 hours, to increase operational capacity of the site by either:
 - Portable diesel generator and diesel storage tank to be located at the site during the peak bushfire season; and / or
 - Upgrading battery reserves on site which includes smart charging and monitoring capabilities.
- Increase APZ to accommodate backup power supply footprint as required.

3.11.3 Additional Portable Coverage

In the event of total systems outage of the facility or where supplementary coverage is required, a mobile cell transmitter repeater, known as a Cell on Wheels (CoW), is recommended to be deployed to a suitable location to provide coverage to the locality.

A future review of operational deployment locations and timings for CoW by the service provider in conjunction with the FCRC / LDMG for this locality is recommended and consideration of staging of CoW in a suitable nearby township during the high fire danger periods or times of extended fire activity within the landscape as part of a pre-emptive operational response.

4. Conclusion and Recommendations

This report provides a Bushfire Hazard Assessment and Management Plan of a proposed Mobile Network Site, including a tower, equipment cabinet and associated infrastructure to be located at Petersen Road, Craignish (Lot 68 MCH4841).

The proposed tower and infrastructure are not considered critical telecommunications infrastructure (client identified). A bushfire hazard assessment identified the site is exposed to a BAL-40 subject to a suitable sized APZ being provided.

The response to the Bushfire Hazard Overlay Code and proposed BPM outlined above in Section 3 that form the overall Bushfire Management Plan have been determined in response to the identified risk and includes the following recommendations:

- The lease area is maintained to the identified standard (Section 3.9.1);
- A 10 m APZ implemented around the external perimeter of the lease area, to the fullest extent possible (Section 3.9.1);
- Specific construction response including construction to withstand a minimum 40 kW/m² radiant heat and ember protection (3.9.2);
- Any local emergency planning groups to update planning to capture new telecommunications facility (Section 3.11.1);
- Backup power source be considered (Section 3.11.2); and
- Consider provision of temporary coverage with portable infrastructure in the event of emergency and damage to site (Section 3.11.3).

The identified BPM are considered appropriate for this proposal based on the ability to provide a level of protection for the proposed telecommunications facility.



Natalie South
Bushfire Consultant
FPAA BPAD Accredited Practitioner No. BPAD41212-L2




Bruce Horkings
Principal Bushfire Consultant and Technical Lead
FPAA BPAD L3 Certified Practitioner No. BPAD29962-L3



5. References

Fraser Coast Regional Council (FCRC). 2024. *Fraser Coast Planning Scheme Version 11 dated 5 August 2019*. Accessed via online mapping portal.

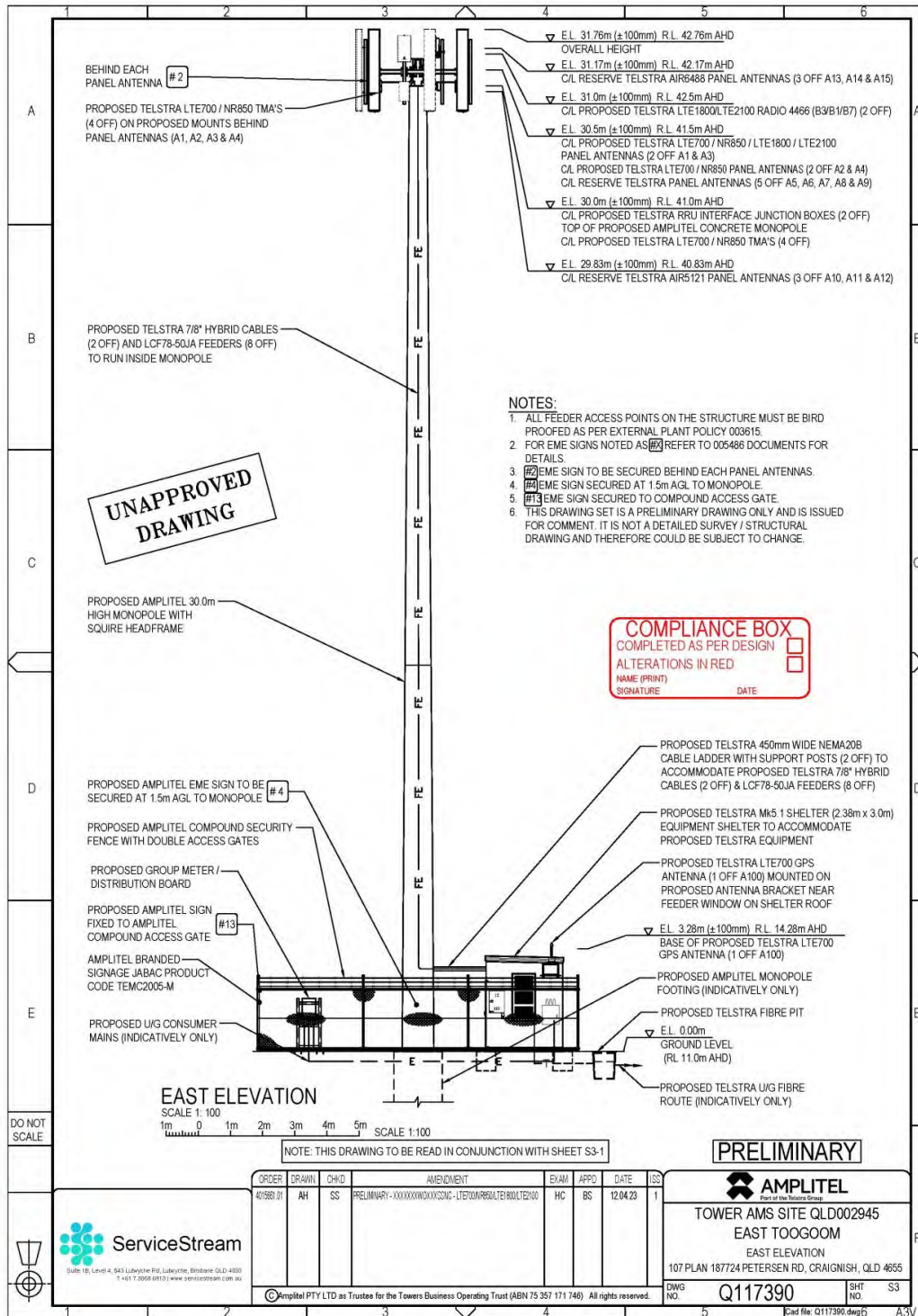
National Association of Steel Framed Housing (NASH). 2021. *Steel Framed Construction in Bush Fire Prone Areas (NS300)*. NASH, Melbourne.

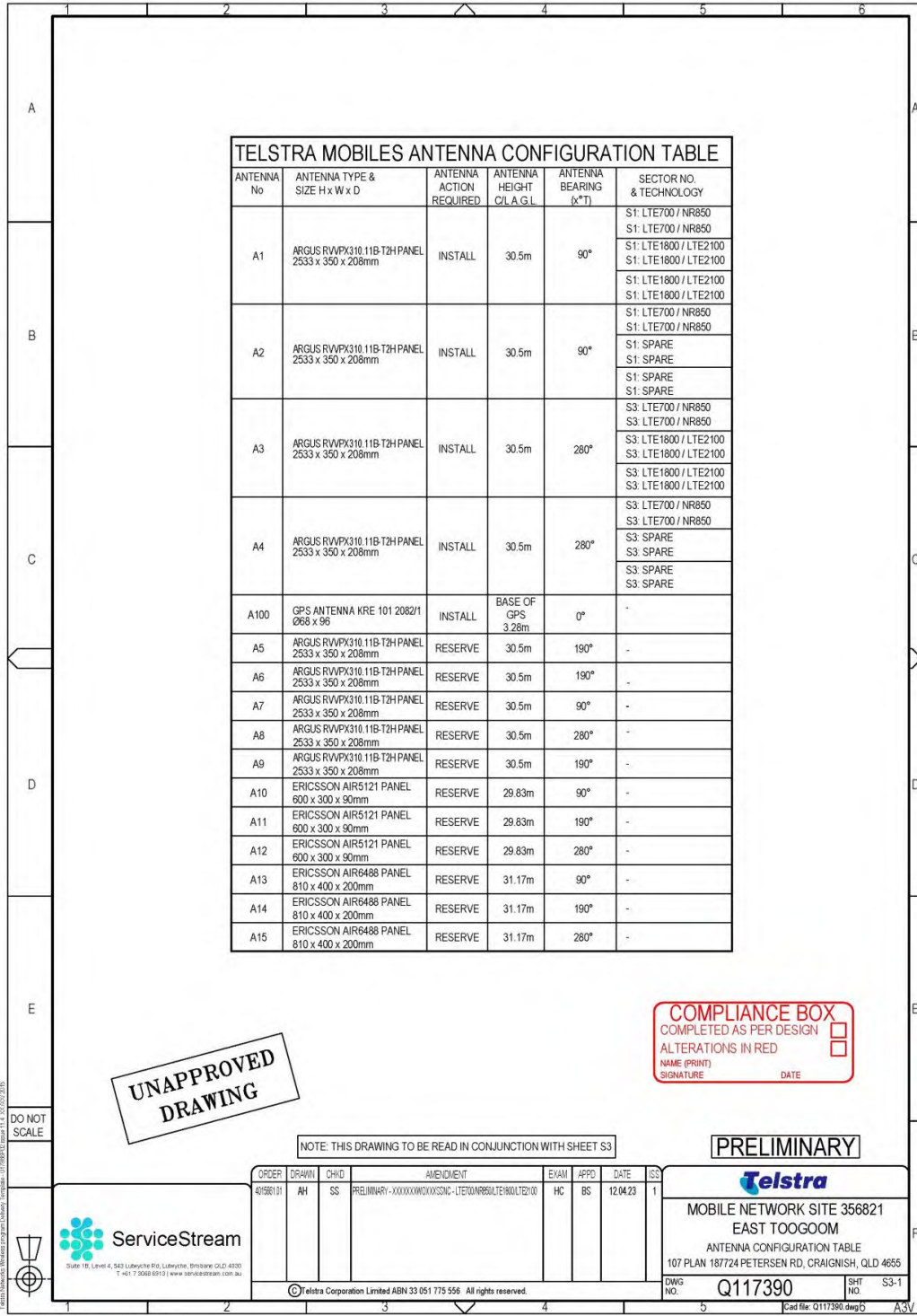
Queensland Fire and Emergency Services (QFES). 2019. *Bushfire Resilient Communities – Technical Reference Guide for the State Planning Policy State Interest ‘Natural Hazards, Risk and Resilience – Bushfire’*. October 2019. The State of Queensland, Queensland Fire and Emergency Services.

Queensland Fire and Emergency Services (QFES). 2021. *Bushfire hazard area - Bushfire prone area - inputs – Queensland*. May 2021. The State of Queensland, Queensland Fire and Emergency Services.

Standards Australia (SA). 2018. *Construction of buildings in bushfire-prone areas (including Amdt 1 and 2), AS 3959:2018*. SAI Global, Sydney.

Bushfire Hazard Assessment and Management Plan - Petersen Road, Craignish | Servicestream





1: Antenna Network (Wireless) program (Dulwich) Template: 07/08/2012 (Issue 1.4, 02/02/2015)

DO NOT SCALE

UNAPPROVED DRAWING

NOTE: THIS DRAWING TO BE READ IN CONJUNCTION WITH SHEET S3

COMPLIANCE BOX
 COMPLETED AS PER DESIGN
 ALTERATIONS IN RED
 NAME (PRINT) _____
 SIGNATURE _____ DATE _____


PRELIMINARY



ORDER	DRAWN	CH/D	AMENDMENT	EXAM	APPD	DATE	ISS
49596101	AH	SS	PRELIMINARY - XXXXXXXXXX/SS/C - LTE/0A/0R/0A/TE/0A/LTE/0A/	HC	BS	12.04.23	1

Telstra	
MOBILE NETWORK SITE 356821 EAST TOO GOOM	
ANTENNA CONFIGURATION TABLE	
107 PLAN 187724 PETERSEN RD, CRAIGNISH, QLD 4655	
DWG NO. Q117390	SHT NO. S3-1

Appendix B – BFAA Bushfire Modelling Report

		NBC Bushfire Attack Assessment Report V4.1 <small>AS3959 (2018) Appendix B - Detailed Method 2</small>	
Print Date: 9/09/2024		Assessment Date: 9/09/2024	
Site Street Address:	Lot 68 MCH4841 - Petersen Road, Craignish		
Assessor:	Bruce Horkings; Eco Logical Australia (ELA)		
Local Government Area:	QLD	Alpine Area:	No
Equations Used			
Transmissivity: Fuss and Hammins, 2002 Flame Length: RFS PBP, 2001/Vesta/Catchpole Rate of Fire Spread: Noble et al., 1980 Radiant Heat: Drysdale, 1985; Sullivan et al., 2003; Tan et al., 2005 Peak Elevation of Receiver: Tan et al., 2005 Peak Flame Angle: Tan et al., 2005			
Run Description:	1. North		
Vegetation Information			
Vegetation Type:	Woodland		
Vegetation Group:	Forest and Woodland		
Vegetation Slope:	1 Degrees	Vegetation Slope Type:	Downslope
Surface Fuel Load(t/ha):	14.9	Overall Fuel Load(t/ha):	17.2
Vegetation Height(m):	2	Only Applicable to Shrub/Scrub and Vesta	
Site Information			
Site Slope:	1 Degrees	Site Slope Type:	Downslope
Elevation of Receiver(m):	Default	APZ/Separation(m):	10
Fire Inputs			
Veg./Flame Width(m):	100	Flame Temp(K):	1200
Calculation Parameters			
Flame Emissivity:	95	Relative Humidity(%):	25
Heat of Combustion(kJ/kg)	18600	Ambient Temp(K):	308
Moisture Factor:	5	FDI:	48
Program Outputs			
Level of Construction:	BAL 40	Peak Elevation of Receiver(m):	3.53
Radiant Heat(kW/m2):	39.02	Flame Angle (degrees):	67
Flame Length(m):	8.04	Maximum View Factor:	0.399
Rate Of Spread (km/h):	0.92	Inner Protection Area(m):	10
Transmissivity:	0.876	Outer Protection Area(m):	0
Fire Intensity(kW/m):	8172		
BAL Thresholds			
Asset Protection Zone(m):	BAL-40: 9	BAL-29: 13	BAL-19: 20
	BAL-12.5: 28	10 kw/m2: 33	Elevation of Receiver: 6

Run Description: 2. East	
Vegetation Information	
Vegetation Type:	Forest
Vegetation Group:	Forest and Woodland
Vegetation Slope:	1 Degrees
Vegetation Slope Type:	Downslope
Surface Fuel Load(t/ha):	23.4
Overall Fuel Load(t/ha):	28.4
Vegetation Height(m):	2
	Only Applicable to Shrub/Scrub and Vesta
Site Information	
Site Slope:	1 Degrees
Site Slope Type:	Downslope
Elevation of Receiver(m):	Default
APZ/Separation(m):	16
Fire Inputs	
Veg./Flame Width(m):	100
Flame Temp(K):	1200
Calculation Parameters	
Flame Emissivity:	95
Relative Humidity(%):	25
Heat of Combustion(kJ/kg)	18600
Ambient Temp(K):	308
Moisture Factor:	5
FDI:	48
Program Outputs	
Level of Construction:	BAL 40
Peak Elevation of Receiver(m):	5.61
Radiant Heat(kW/m2):	37.8
Flame Angle (degrees):	67
Flame Length(m):	12.79
Maximum View Factor:	0.394
Rate Of Spread (km/h):	1.44
Inner Protection Area(m):	11
Transmissivity:	0.859
Outer Protection Area(m):	5
Fire Intensity(kW/m):	21190
BAL Thresholds	
	BAL-40: BAL-29: BAL-19: BAL-12.5: 10 kw/m2: Elevation of Receiver:
Asset Protection Zone(m):	16 21 30 41 48 6

Run Description: 3. South					
Vegetation Information					
Vegetation Type:	Woodland				
Vegetation Group:	Forest and Woodland				
Vegetation Slope:	3 Degrees				
Surface Fuel Load(t/ha):	14.9				
Vegetation Height(m):	2				
Vegetation Slope Type:	Upslope				
Overall Fuel Load(t/ha):	17.2				
Only Applicable to Shrub/Scrub and Vesta					
Site Information					
Site Slope:	1 Degrees				
Elevation of Receiver(m):	Default				
Site Slope Type:	Downslope				
APZ/Separation(m):	10				
Fire Inputs					
Veg./Flame Width(m):	100				
Flame Temp(K):	1200				
Calculation Parameters					
Flame Emissivity:	95				
Heat of Combustion(kJ/kg)	18600				
Moisture Factor:	5				
Relative Humidity(%):	25				
Ambient Temp(K):	308				
FDI:	48				
Program Outputs					
Level of Construction:	BAL 40				
Radiant Heat(kW/m2):	31.97				
Flame Length(m):	6.6				
Rate Of Spread (km/h):	0.7				
Transmissivity:	0.874				
Fire Intensity(kW/m):	6201				
Peak Elevation of Receiver(m):	2.96				
Flame Angle (degrees):	72				
Maximum View Factor:	0.327				
Inner Protection Area(m):	10				
Outer Protection Area(m):	0				
BAL Thresholds					
BAL-40:	BAL-29:	BAL-19:	BAL-12.5:	10 kw/m2:	Elevation of Receiver:
Asset Protection Zone(m): 7	10	16	24	27	6

Run Description: 4. West					
Vegetation Information					
Vegetation Type:	Woodland				
Vegetation Group:	Forest and Woodland				
Vegetation Slope:	1 Degrees				
Surface Fuel Load(t/ha):	14.9				
Vegetation Height(m):	2				
Vegetation Slope Type:	Upslope				
Overall Fuel Load(t/ha):	17.2				
Only Applicable to Shrub/Scrub and Vesta					
Site Information					
Site Slope:	1 Degrees				
Elevation of Receiver(m):	Default				
Site Slope Type:	Downslope				
APZ/Separation(m):	10				
Fire Inputs					
Veg./Flame Width(m):	100				
Flame Temp(K):	1200				
Calculation Parameters					
Flame Emissivity:	95				
Heat of Combustion(kJ/kg)	18600				
Moisture Factor:	5				
Relative Humidity(%):	25				
Ambient Temp(K):	308				
FDI:	48				
Program Outputs					
Level of Construction:	BAL 40				
Radiant Heat(kW/m2):	35.25				
Flame Length(m):	7.27				
Rate Of Spread (km/h):	0.8				
Transmissivity:	0.875				
Fire Intensity(kW/m):	7118				
Peak Elevation of Receiver(m):	3.24				
Flame Angle (degrees):	70				
Maximum View Factor:	0.361				
Inner Protection Area(m):	10				
Outer Protection Area(m):	0				
BAL Thresholds					
BAL-40:	BAL-29:	BAL-19:	BAL-12.5:	10 kw/m2:	Elevation of Receiver:
Asset Protection Zone(m): 8	12	18	26	31	6



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FRASER COAST REGIONAL COUNCIL
ORDINARY MEETING NO. 8/25

WEDNESDAY, 27 AUGUST 2025

SUBJECT:	ADOPTED INFRASTRUCTURE CHARGES RESOLUTION SEPTEMBER 2025 - TRANSITIONAL ARRANGEMENTS FOR CURRENT DEVELOPMENT APPLICATIONS
DIRECTORATE:	STRATEGY, COMMUNITY & DEVELOPMENT
RESPONSIBLE OFFICER:	DIRECTOR STRATEGY, COMMUNITY & DEVELOPMENT
AUTHOR:	EXECUTIVE MANAGER DEVELOPMENT
LINK TO CORPORATE PLAN:	Resilient and Environmentally Responsible Region. Plan for and provide community infrastructure to support growth, connectivity and livability.

1. PURPOSE

To seek Councils endorsement of Transitional arrangements for the *September 2025 Adopted Infrastructure Resolution* for development applications in the decision stage but not decided as at 1 September 2025.

2. EXECUTIVE SUMMARY

Due to ongoing staff workload pressures, a number of development applications are now, or may soon be, outside of statutory timeframes for the decision stage under the *Planning Act 2016*. With a new adopted infrastructure charge resolution coming into effect on the 1st of September that includes, an increase to infrastructure charges, applicants may exercise their rights to lodge a deemed approval for Code Assessable applications or Deemed Refusal appeals for Impact Assessable applications.

3. OFFICER'S RECOMMENDATION

That Council maintain the *January 2025 Adopted infrastructure Charges Resolution* rates for all current applications that are in Decision stage on 1 September 2025, and, that pursuant to the Development Assessment Rules under section 28 of the *Planning Act 2016*, should have been decided prior to 1 September 2025.

4. BACKGROUND & PREVIOUS COUNCIL CONSIDERATION

Development applications are processed in accordance with the Development Assessment Rules under Section 68 of the *Planning Act 2016*. The rules set out the application steps with each step having applied timelines. One key step is the decisions stage. At this stage, all other actions are completed and Council as assessment manager has the onus to decide. Whilst some steps have consequences to failing to meet the step timeline, the applicant has the onus of initiating

action should an application not be decided within the prescribed time. In this regard, an applicant can lodge a deemed approval notice for a code assessable development application, or lodge a representation or/and an appeal for an Impact assessable application. Either action is undesirable from Councils perspective.

Whilst under normal circumstances, Council officers are communicating with applicants regarding timelines, the impending commencement of the September 2025 Adopted Infrastructure Charges Resolution (AICR) is compounding matters with applicants expressing concern and have advised officers that the deemed approval path is likely due to the consequences of increased charges being generated under the September resolution. Whilst every effort will be made to decide the current applications in decision stage, current workloads with total applications averaging 280 at any time, it is unlikely that council will have all affected applications decided by 1 September.

The Deemed Approval pathway is undesirable from Council's perspective as it approves a development in full as lodged, limits Councils timeline to respond with development conditions resulting in a reprioritising of workloads and with an impending influx of deemed approvals, place significant demands on resources across Council as well as a risk of missing development conditions or controls.

Actual numbers of applications that would be eligible for a deemed approval leading up to the 1st of September will be subject to officers' capacity to decide them all and accordingly, actual exposure is at the time of writing this report, not quantified. Assessing officers are identifying at risk applications and they will be monitored leading up until the 1st of September.

5. PROPOSAL

It is proposed that:

- Superseded infrastructure charges pursuant to the January 2025 Adopted Infrastructure Resolution be applied to applications lodged under the current charging regime and in decision stage but not decided due to internal constraints.
- Planning staff compile a register of all applications that have surpassed the statutory decision period.
- Applicants be notified of the delays and advised of Council's intent to address the issue transparently.

6. FINANCIAL & RESOURCE IMPLICATIONS

While applying superseded infrastructure charges may be seen as a revenue reduction compared to a post September 1 decision, similarly, if the relevant applications were decided prior to 1 September within the prescribed timeline, revenue would be unchanged.

An influx of Deemed Approvals and the demand placed on operational resources may be extensive similarly the costs of legal appeals for Deemed Refusals disputes for Impact Assessable applications would excessive to achieve a mediated outcome that included due to timing, January 2025 charges.

7. POLICY & LEGAL IMPLICATIONS

This approach aligns with the principles of procedural fairness under the *Planning Act 2016*. Proactively identifying and managing deemed approvals may reduce exposure to legal risk.

The action of implementing a transitional arrangement is a discretionary policy approach within Councils authority as assessment manager.

8. RISK IMPLICATIONS

Key risks include:

- Legal or reputational risk from applicants whose applications become deemed approved.
- Perceived inequity if charges increase due to internal delays.
- These risks are mitigated by proactive tracking, transparency, and fairness in decision-making.

9. CRITICAL DATES & IMPLEMENTATION

1. 1 September 2025: Commencement of new Adopted Infrastructure Charges Resolution.
2. September 2025 and beyond: Implementation of superseded charges, where appropriate, for eligible applications.

10. CONSULTATION

Informal consultation has occurred between planning officers and senior staff and executive.

11. CONCLUSION

The proposed approach acknowledges Council's current operational challenges and workload delays while ensuring fairness and consistency in the development assessment process. It protects applicants from the consequences of delays outside their control and allows Council to maintain transparency and legal defensibility in its infrastructure charging framework.

12. ATTACHMENTS

Nil

FRASER COAST REGIONAL COUNCIL
ORDINARY MEETING NO. 8/25

WEDNESDAY, 27 AUGUST 2025

SUBJECT:	OPERATIONAL REVIEW - REMOVAL OF FEES AT WETSIDE AQUA NINJA COURSE
DIRECTORATE:	STRATEGY, COMMUNITY & DEVELOPMENT
RESPONSIBLE OFFICER:	DIRECTOR STRATEGY, COMMUNITY & DEVELOPMENT
AUTHOR:	MANAGER AQUATIC CENTRES
LINK TO CORPORATE PLAN:	Connected, Inclusive Communities and Spaces. Create vibrant community spaces to encourage community activation.

1. PURPOSE

To seek Council's consideration to cease charging fees for the Aqua Ninja at WetSide Water Park and transition the structure to a free-access water play element. This proposal aims to reduce ongoing operational costs and improve accessibility for the broader community.

2. EXECUTIVE SUMMARY

The Aqua Ninja course has consistently operated at a financial loss since opening in October 2022 and has faced ongoing challenges in staffing, particularly in recruiting sufficient lifeguards. These issues have led to reductions in operating hours and a review of the viability of maintaining the current paid model. This report proposes ceasing the paid service, thereby removing the dedicated two lifeguard requirement by one lifeguard and transitioning Aqua Ninja into a free-use water attraction monitored via roving supervision. The change will result in significant cost savings and operational efficiency while improving family access. Additionally, removing the current IT infrastructure used to support Aqua Ninja operations (including internet access and web portal services) will eliminate ongoing digital costs.

3. OFFICER'S RECOMMENDATION

That Council:

1. Cease Aqua Ninja as a paid service effective from 31 August 2025.
2. Introduce the following seasonal operating model:
 - Out of school holidays: Weekends only, from 12:00pm to 5:00pm.
 - During school holidays: Daily operation, from 12:00pm to 5:00pm.

4. BACKGROUND & PREVIOUS COUNCIL CONSIDERATION

The Aqua Ninja course opened in October 2022 with limited operating hours due to lifeguard shortages. As staffing improved, hours were extended. However, patronage remained consistently lower than that of other features, such as the water slides. An informal councillor briefing (April 2023, docs #4767674) confirmed that Aqua Ninja operated at a loss on 64 out of 70 days, with positive returns recorded on just six days. Reduced opening hours (10am–2pm) was trialled to manage costs. Despite these adjustments, the attraction has not reached financial sustainability.

5. PROPOSAL

It is proposed that the Aqua Ninja course operate under the following schedule:

- Out of school holidays: Weekends only, from 12:00pm to 5:00pm
- During school holidays: Daily operation, from 12:00pm to 5:00pm

To support improved community access and streamline service delivery, the Aqua Ninja will be realigned as a free-access play structure. This revised model eliminates the need for:

- Ticketing infrastructure
- Internet service and web management systems

Supervision of the course will be provided by one dedicated roving lifeguard, aligning with operational practices for other interactive water play elements at Wetside. This approach enables cost efficiencies, reduces administrative overheads, and enhances the visitor experience by removing barriers to participation.

The only negative impact to patrons will be that Council cannot provide timed participation in the Aqua Ninja Course. The need for the ‘timing /operator/ lifeguard’ is eliminated.

6. FINANCIAL & RESOURCE IMPLICATIONS

During the 2024/2025 financial year, the Aqua Ninja attraction generated \$11,506.30 in ticket sales; however, operational wages totalled \$53,381.16 when operating at capacity, resulting in a net operational loss of \$25,432.58. In addition to staffing, IT-related costs—including internet services, a web-based booking platform, and after-hours support—added a further \$10,005.60 to annual expenses. Transitioning the Aqua Ninja to a free-use play structure in 2025/2026 is projected to reduce operational staffing costs to \$36,557.65 and eliminate all associated IT and support costs. This represents a total estimated annual saving of \$26,829.11, while also improving accessibility for the community by removing the user-pay barrier.

7. POLICY & LEGAL IMPLICATIONS

There are no immediate policy or legal implications. Updated signage and a revised task-based risk assessment will reflect supervision changes. Lifeguard deployment complies with Wetside’s endorsed operational risk framework and safe work systems.

8. RISK IMPLICATIONS

Key risks identified:

- Potential for misuse or non-compliant behaviour by unsupervised patrons.

Mitigation measures:

- Development and implementation of a site-specific risk assessment addressing potential hazards, injury likelihood, and risk controls.
- Update to Safe Work Procedure (SWP) for water play structures.
- Tailored training for Lifeguards for the new proposed conditions.
- Clear, prominent and updated signage outlining supervision responsibilities, age limits, and user behaviour expectations.
- Passive surveillance via shaded zones, enabling natural observation by parents and staff.
- Ongoing incident monitoring through FCRC incident reporting process, with escalation protocols to Safety department where needed.

This risk-managed approach ensures that public safety is maintained while achieving operational flexibility.

9. CRITICAL DATES & IMPLEMENTATION

10 September 2025 is the reopening of Wetside post the winter closure.

10. CONSULTATION

- Executive Manager Community and Culture
- Aquatics Team (Operational Lead)
- Wetside Coordinator
- Internal IT and Finance staff
- Senior Safety Business Partner

11. CONCLUSION

Aqua Ninja in its current fee model is not financially sustainable. Transitioning to a free water course will reduce costs, increase community use, and simplify operations without compromising safety. This approach supports Council's goal of providing inclusive, family-friendly recreational experiences while ensuring sound financial management.

12. ATTACHMENTS

Nil

FRASER COAST REGIONAL COUNCIL
ORDINARY MEETING NO. 8/25

WEDNESDAY, 27 AUGUST 2025

SUBJECT:	AMENDMENT TO 25/26 FEES & CHARGES - TENNIS COURT LIGHTING FEE
DIRECTORATE:	INFRASTRUCTURE SERVICES
RESPONSIBLE OFFICER:	DIRECTOR INFRASTRUCTURE SERVICES
AUTHOR:	EXECUTIVE MANAGER OPEN SPACE & ENVIRONMENT
LINK TO CORPORATE PLAN:	Focused Organisation and Leadership. Ensure sound financial management to maintain our long-term financial sustainability.

1. PURPOSE

The purpose of this report is to seek approval to amend the fee for Tennis Court Tokens (For Lighting) in the 2025/26 Schedule of Fees and Charges.

2. EXECUTIVE SUMMARY

This report addresses an administrative oversight where a fee was incorrectly listed at a higher amount than intended in the 2025/26 Schedule of Fees and Charges. The report seeks Council's approval to amend the listed fee of \$15 per half hour for Tennis Court Tokens (For Lighting) to \$5. The intended fee was \$5 per half-hour, representing a modest increase from the previous fee of \$3.05. This adjustment ensures that the fee accurately reflects the level of service provided.

Lighting tokens are used to operate court lighting at several community tennis facilities across the region, including Wook-Koo Park, Yengarie Hall Grounds, A.E. Fielding Park, Little Tinana Recreation Ground & Magnolia Hall, Bidwell. These venues provide important after-hours access for both organised competitions and casual social play, and the correct fee setting is essential to maintaining affordable community access.

3. OFFICER'S RECOMMENDATION

That Council adopt the amendment to the 2025/26 Schedule of Fees and Charges to reflect the intended fee for Tennis Court Tokens (For Lighting) of \$5 per half-hour.

4. BACKGROUND & PREVIOUS COUNCIL CONSIDERATION

As part of the annual review of Fees & Charges, Council adopted the 2025/26 fees. An administrative oversight resulted in the tennis court lighting fee being incorrectly set at \$15 per half-hour. This error was not identified during the adoption process.

Lighting tokens are currently available for use at the following sites:

- Wook-Koo Park – community tennis facility providing after-hours access for social and casual play
- Yengarie Hall Grounds – local recreational courts used by small community groups
- A.E. Fielding Park – popular district facility with high evening usage during seasonal social competitions
- Little Tinana Recreation Ground – multi-use site supporting both casual tennis and community events
- Magnolia Hall – local recreational courts used by small community groups

5. PROPOSAL

It is proposed to amend the 2025/26 Schedule of Fees and Charges for 'Open Space and Environment' with changes noted in red as follows:

Page Number	Name	Unit	Adopted 25/26 Fee	Proposed Action	Proposed Fee 25/26	Reason for Change
18	Tennis Court Tokens (For Lighting)	Per half hour	\$15.00	Adjust fee to \$5.00	\$5.00	The original fee was incorrectly listed as \$15 instead of \$5.

6. FINANCIAL & RESOURCE IMPLICATIONS

The corrected fee of \$5 per half-hour represents a marginal increase of \$1.95 from the previous \$3.05. This change will result in a minor revenue uplift and contribute to recovering utility costs associated with providing the service.

7. POLICY & LEGAL IMPLICATIONS

The proposed amendment is compliant with the *Local Government Act 2009* and the *Local Government Regulation 2012*.

8. RISK IMPLICATIONS

If not amended, the current fee may lead to reputational damage and public dissatisfaction. The inflated charge could adversely affect community access and place undue financial pressure on local social tennis groups that depend on affordable court lighting.

9. CRITICAL DATES & IMPLEMENTATION

If adopted, the amendment to the tennis court lighting fee will be implemented immediately and reflected in the published 2025/26 Schedule of Fees and Charges.

10. CONSULTATION

Consultation with local social tennis clubs and Councillors has confirmed that the current \$15 fee is inconsistent with the level of service provided. Stakeholders have expressed strong support for amending the fee to the correct cost.

11. CONCLUSION

This report proposes an amendment to address an administrative oversight where a fee was incorrectly listed at a higher amount than intended in the 2025/26 Schedule of Fees and Charges. The amendment ensures that the fee for Tennis Court Tokens (For Lighting) accurately reflects the level of service provided.

12. ATTACHMENTS

Nil

FRASER COAST REGIONAL COUNCIL
ORDINARY MEETING NO. 8/25

WEDNESDAY, 27 AUGUST 2025

SUBJECT:	COMMUNITY GARDEN SITE ON ENDEAVOUR WAY, ELI WATERS
DIRECTORATE:	INFRASTRUCTURE SERVICES
RESPONSIBLE OFFICER:	DIRECTOR INFRASTRUCTURE SERVICES
AUTHOR:	EXECUTIVE MANAGER OPEN SPACE & ENVIRONMENT
LINK TO CORPORATE PLAN:	Connected, Inclusive Communities and Spaces. Create vibrant community spaces to encourage community activation.

1. PURPOSE

This report outlines the history, current management, and operational status of the community garden at Endeavour Way, Eli Waters, and provides an assessment of its viability along with indicative cost estimates for potential renewal or decommissioning options.

2. EXECUTIVE SUMMARY

The community garden located on Endeavour Way, Eli Waters, was previously managed by a local school. Since management ceased, the site has fallen into a state of disrepair and is currently not in active use. In its current condition, the site requires ongoing maintenance by Council, with minimal community engagement or interest shown to date.

A successful community garden already operates nearby at Halcro Street, and given the close proximity, a second garden in the area is unlikely to be feasible.

Infrastructure Services has identified two (2) options for the future of the site:

1. Reactivate the garden through an Expression of Interest (EOI) process to identify a new community group to manage the site under a lease; or
2. Decommission the garden and return the area to open space to reduce maintenance costs and allow for broader community use.

3. OFFICER'S RECOMMENDATION

That Council approves to decommission the Community Garden on Endeavour Way, Eli Waters including removal of existing infrastructure and reinstatement of the site as open space in accordance with the Parks Strategy 2041.

4. BACKGROUND & PREVIOUS COUNCIL CONSIDERATION

At the Ordinary Council Meeting (ORD 12.1) the following resolution was carried unanimously by Council.

RESOLUTION (Lachlan Cosgrove/Daniel Sanderson)

That Council be provided with a report that:

1. Details the history, management & status of the community garden site on Endeavour Way, Eli Waters, and
2. Provides options, including cost estimates, to decommission the site to provide improved community use and enjoyment.

Carried Unanimously

The community garden at Endeavour Way, Eli Waters has been in place for over ten years and was previously managed by a local school as part of its educational programming. However, the site has not been utilised for several years and has since fallen into a state of disrepair.

A successful community garden is already operating nearby at Halcro Street, demonstrating strong volunteer support and consistent use. Given its proximity and current level of community engagement, it is unlikely that a second community garden in such close vicinity would attract sufficient interest or support to be viable.

Given the current disuse of the site, limited community engagement, and ongoing maintenance costs to Council, two (2) options are proposed for consideration.

5. PROPOSAL

It is proposed that Council consider two (2) viable options for the future use of the community garden site located on Endeavour Way, Eli Waters, based on its current condition, level of community interest, and alignment with strategic open space planning.

Option 1 – Site Renewal and Community Re-engagement

This option proposes the renewal of the site using internal operational resources to restore basic functionality and improve overall presentation. Once renewed, an Expression of Interest (EOI) process would be initiated to identify a suitable community group or not-for-profit organisation to lease or manage the site under a Memorandum of Understanding (MOU). This would mirror existing arrangements in place for other community gardens across the region.

This approach aims to retain the site's original purpose as a community garden, while transferring future maintenance and activation responsibilities to an engaged and committed external group.

Option 2 – Site Decommissioning and return to Open Space (Officers Recommendation)

Alternatively, Council may choose to decommission the existing community garden and return the site to passive open space use. This would involve the removal of all garden infrastructure and reinstatement of the area in accordance with its designation as a Local Recreation Park under the Parks and Open Space Strategy 2041.

This option reflects the current lack of usage, limited community involvement, and the cost-effective nature of decommissioning (estimated to be less than \$15,000). It would also reduce

future operational and maintenance obligations and better align the site's function with its intended role within the local open space network.

Importantly, decommissioning the site would allow for future flexibility in land use, enabling the space to be considered for other community services or infrastructure as part of Council's capital planning processes.

6. FINANCIAL & RESOURCE IMPLICATIONS

Option 1 - to renew the site and seek community management, is estimated to cost between \$15,000 and \$25,000. This includes site clean-up, infrastructure repairs, and minor administrative costs. Operational staff resources would be allocated throughout winter months to minimise impact to scheduled service delivery.

Option 2 - to decommission the site and return it to open space, is estimated to cost up to \$15,000. This includes the removal of infrastructure and basic landscaping. Ongoing maintenance costs would be reduced, as the site would be managed as standard open space.

7. POLICY & LEGAL IMPLICATIONS

The site is located within Endeavour Park, which is classified as a Local Recreation Park under Council's Parks and Open Space Strategy 2041. Under this classification, community gardens are not typically supported as part of standard embellishment guidelines for local parks.

8. RISK IMPLICATIONS

Option 1 carries the risk that, despite investment in site renewal, a suitable community group may not be found to manage the garden, leading to continued underuse and ongoing maintenance obligations for Council. There is also a risk of inconsistent site upkeep if community management is not sustained over time.

Option 2 presents minimal operational risk. However, decommissioning the site may attract some negative feedback from community members who value the potential of the garden, even if current engagement is low.

Both options involve low financial risk, with costs manageable within existing budgets.

9. CRITICAL DATES & IMPLEMENTATION

Should Council resolve to proceed with either option, the following indicative timeframes are proposed:

- August 2025: Council decision on preferred option.
- September – October 2025:
 - Option 1: Commencement of site renewal works.
 - Option 2: Commencement of decommissioning works.
- November 2025 (Option 1 only):
 - Initiation of Expression of Interest (EOI) process to identify community group.
 - Review EOI submissions and determine future management arrangements (Option 1).

Implementation of either option will be managed by Council's Infrastructure Services team and coordinated to ensure minimal disruption to surrounding park users.

10. CONSULTATION

Internal consultation has been undertaken with the following Council departments:

- Infrastructure Services
- Open Space & Environment
- Community Engagement

No formal external consultation has been conducted to date due to the limited current usage of the site. Should Council resolve to proceed with Option 1, targeted community consultation will be undertaken as part of the EOI process to gauge interest and promote community-led activation.

If Option 2 is endorsed, broader communication with local residents will be undertaken to inform them of the changes and of any future use of the site.

11. CONCLUSION

The community garden at Endeavour Way, Eli Waters is currently underutilised and in a state of disrepair. Two (2) viable options have been identified: renewing the site to support future community use or decommissioning the garden and reverting the area to open space in line with Council's strategic planning.

Given the site's current condition, limited community engagement, and its designation as a Local Recreation Park under the Parks and Open Space Strategy 2041, Option 2 – decommissioning and return to open space is recommended. This approach will also allow the site to be considered for alternative community uses through future capital planning.

12. ATTACHMENTS

Nil

FRASER COAST REGIONAL COUNCIL
ORDINARY MEETING NO. 8/25

WEDNESDAY, 27 AUGUST 2025

SUBJECT:	DISPOSAL OF FLOOD WARNING INFRASTRUCTURE NETWORK ASSETS TO THE BUREAU OF METEOROLOGY (BOM)
DIRECTORATE:	INFRASTRUCTURE SERVICES
RESPONSIBLE OFFICER:	DIRECTOR INFRASTRUCTURE SERVICES
AUTHOR:	MANAGER DISASTER PLANNING
LINK TO CORPORATE PLAN:	Focused Service Delivery Effectively manage and maintain our assets to reduce asset failure.

1. PURPOSE

To seek Council approval to transfer nine (9) Flood Warning Infrastructure Network assets (flood Gauges) to the Bureau of Meteorology (BOM)

Council to endorse the Exemption Under Section 236(1)(b)(i) of the *Local Government Regulation 2012*, disposal of a valuable non-current asset to a government agency (Bureau of Meteorology) is permitted without the need for tender or auction.

2. EXECUTIVE SUMMARY

Seeking endorsement of Council that Under Section 236(1)(b)(i) of the *Local Government Regulation 2012*, disposal of a valuable non-current asset to a government agency—such as the Bureau of Meteorology (BOM) is permitted without the need for tender or auction.

The exemption will allow the Chief Executive Officer to authorise the transfer of nine Flood Warning Infrastructure Network (FWIN) assets to the BOM, in accordance with asset disposal policy DOCS#5151960

ELT supports the transfer however, an exemption under Section 236(1)(b)(i) of the *Local Government Regulation 2012* is required by Council to permit the transfer without the need for tender or auction.

Noting that the written down value of the assets that could be identified in our asset register is \$38,002, notwithstanding some of the assets were not on an asset register and are over 30 years old.

Transfers under the national Flood Warning Infrastructure Network (FWIN) program are for the nominal value of 1\$AUD. BOM will then manage the oncost of future maintenance and upgrades of the infrastructure at each site.

3. OFFICER'S RECOMMENDATION

1. That Council endorse the exemption under Section 236(1)(b)(i) of the *Local Government Regulation 2012*, disposal of a valuable non-current asset to a government agency (Bureau of Meteorology) is permitted without the need for tender or auction.
2. Council delegate the authority to the Chief Executive Officer to dispose of the nine (9) Flood Warning Infrastructure Network Assets, through the disposal of assets policy and as per the Bureau of Meteorology agreement.

4. BACKGROUND & PREVIOUS COUNCIL CONSIDERATION

Council operates 20 electronic rain and river gauges across the region. Some of these assets are over 30 years old and have significantly depreciated in value. However, they continue to cost Council to maintain and upgrade the ageing network.

In the 2023-24 Federal Budget, the Australian Government committed up to \$236 million over 10 years for the Bureau to address critical, long-standing risks in Australia's flood warning network as part of the Flood Warning Infrastructure Network Program (FWIN Program).

As part of the FWIN Program, the Commonwealth will take ownership of a portion of Australia's flood observation network, focused on high priority assets in high priority catchments and including certain flood management assets. The ongoing maintenance and operational costs associated with these flood warning assets will be shared equally by the Commonwealth and each relevant State or Territory.

The Fraser Coast Regional Council area was identified as a potential pilot site for the national project in consultation with the Manager Disaster Planning in 2023. This was identified after the four (4) floods in 2022, and other significant issues including the dangers to the community for the Burrum Cherwell river catchments.

This first phase of the project will see BOM take over almost half of the network with the remainder transfers to occur over the next few years. This project represents a fundamental and generational change, easing the burden on Council from the inherent costs of maintaining and upgrading these assets.

The assets for transfer are listed in the table below.

Station Name	Station Number	Private / Council Land/ Other
Boompa Road Alert	540767	Private
Glenwood (Mary River) Alert	540766	Council land near Community Hall
Howard Alert	40907	Private
Musket Flat Mt Alert	40902	Private
Pacific Haven Alert	40903	Private
Railway Bridge Alert	40904	QRail
Takura Alert	540268	Council Land
Upper Cherwell Alert	40905	Private
Walls Camp (Pacific Haven) Alert	540792	Council Road reserve

5. PROPOSAL

Council delegate the authority to the Chief Executive Officer to dispose of the nine (9) FWIN Assets, through the disposal of assets policy and as per the BOM agreement.

6. FINANCIAL & RESOURCE IMPLICATIONS

The written down value of the assets that could be identified in our asset register is \$38,002, notwithstanding some of the assets were not on an asset register and over 30 years old.

BOM will pay a nominal figure of \$1AUD for the assets.

Once handed over, the maintenance and upgrades will save Council an estimated \$15,000 per annum in maintenance costs and up to \$70,000 per asset for upgrades.

7. POLICY & LEGAL IMPLICATIONS

Conforms with Asset Disposal Policy DOCS#5151960

Conforms with Section 236(1)(b)(i) of the *Local Government Regulation 2012*, disposal of a valuable non-current asset to a government agency is permitted without the need for tender or auction.

8. RISK IMPLICATIONS**9. CRITICAL DATES & IMPLEMENTATION**

Before the storm season

10. CONSULTATION

- ELT
- BOM FWIN Program Director
- Onsite visits with BOM
- Executive Manager Operations
- Executive Manager Corporate Services
- Manager Financial Compliance and Reporting
- Procurement Manager


11. CONCLUSION

Fraser Coast Regional Council is one of the few pilot Councils to rollout this program across the country. Endorsing the exemption to transfer the assets to the BOM is in the best interest of Council.

The cost associated with managing, maintaining and upgrading aged infrastructure is expensive and this project will take this burden away from Council.

12. ATTACHMENTS

1. Council Asset Disposal Policy - Docs #5251494 [↓](#)
2. BOM/ FCRC Transfer of Assets Agreement [↓](#)

	COUNCIL POLICY	
	Asset Disposal Policy	
	Policy Number	CP094
	Directorate	Organisational Services
	Owner	Executive Manager, Financial Services
	Last Approved	26 March 2025
	Review Due	26 March 2027

1. PURPOSE

This policy establishes a structured framework for the disposal of assets by Fraser Coast Regional Council (Council), ensuring that disposals are conducted transparently, accountably, and in compliance with relevant legislation, Queensland local government regulations, and Australian Accounting Standards. This includes special procedures for portable and attractive assets, aiming to prevent misuse or misappropriation.

2. SCOPE

This policy applies to all Fraser Coast Regional Council employees, officers, and contractors involved in the disposal of Council-owned assets. It encompasses various categories of assets, including fleet, plant, equipment, office furniture, library items, and IT hardware and software. Exclusions from this policy are land sales for recovery of unpaid rates, and specific infrastructure assets, which fall under other procedures or departments.

3. TERMS AND DEFINITIONS

- **Asset:** Any item recognised as an asset under Australian Accounting Standards, including tangible and intangible items.
- **Portable and Attractive Items:** Items not classified as high-value but considered high-risk due to their portability or desirability, such as electronics or tools.
- **Asset Disposal:** The process of divesting an asset through sale, transfer, donation, or write-off.
- **Carrying Amount:** The value at which an asset is recognised on the balance sheet, per AASB 116.
- **Best Value:** Achieving the most advantageous outcome for Council in financial, social, and environmental terms.
- **Community Interest Asset:** An asset that provides significant social, cultural or economic benefits to the community

4. POLICY STATEMENT

Council commits to fair and transparent disposal of assets, ensuring compliance with Australian Accounting Standards, specifically AASB 116 (Property, Plant and Equipment) and AASB 13 (Fair Value Measurement). Disposals should maximise returns and meet accountability standards, with specific attention to the secure handling of portable and attractive items and compliance with legislative requirements for land disposals.

4.1 Compliance with Australian Accounting Standards

Disposals are conducted according to AASB 116 and AASB 13, ensuring all assets are accurately valued at fair value prior to disposal, and gains or losses are recognised in financial statements.

4.2 Valuation Prior to Disposal

Assets will be measured at fair value at disposal, with adjustments reflected in Council's financial statements. Valuation for portable and attractive assets will include security assessments based on asset desirability and risk factors.

4.3 Methods of Disposal

Disposal methods include:

- **Public Auction:** Ensures competitive and transparent pricing.
- **Tender Process:** Suitable for high-value or non-standard assets.
- **Donation to Charitable Organisations:** When aligned with community goals.
- **Trade-In:** Primarily for plant and equipment replacements.
- **Scrapping/Destruction:** When the asset holds no residual value or utility.

4.4 Criteria for Disposal

An asset may be disposed of if it:

- Has reached the end of its useful life.
- Is surplus to operational needs.
- Is obsolete, outdated, damaged beyond repair, or uneconomical to maintain.
- Is replaced by a newer asset.

4.5 Special Considerations for Portable and Attractive Items

Given their portability and desirability, these assets require additional controls:

1. Approval from the Executive Manager or delegated authority before disposal.
2. Preference for disposal methods that offer transparency, such as auction or tender, especially for electronics, tools, or items valued above a set threshold.
3. Recording details of each portable and attractive asset disposal in the asset register.

4.6 Sale of Land

In accordance with the Local Government Regulation 2012, the disposal of land owned by the Council is subject to the following requirements:

4.6.1 Default Disposal Methods

Public Auction or Tender:

- Council land is generally sold through public auction or tender to ensure competitive pricing, fairness, and transparency (Section 227).

4.6.2 Exemptions to Auction or Tender

Land may be disposed of through alternative methods if specific criteria are met (Section 236):

1. Disposal to a Government Agency:
 - Land can be transferred to another government body or agency.
2. Disposal to a Community Organisation:
 - Land may be sold or leased to a non-profit or community organisation for purposes aligned with Council's goals.
3. Adjoining Landowner Sale:
 - Land that is not independently marketable due to its size, shape, or location may be sold directly to an adjoining landowner.
4. Other Circumstances (including listing for sale):
 - Subject to Council resolution providing any required justification.

4.6.3 Approval and Record-Keeping

- Any disposal of land must be approved by Council, with a resolution passed in a public meeting for any exemption to auction or tender unless delegated authority is in place for specific transactions.
- All details of the disposal, including the valuation, method, and justification for exemptions, must be recorded and retained for audit purposes.

4.6.4 Valuation Requirements

- Land should be valued at market value prior to disposal to ensure the best financial outcome for the community.
- If most recent land revaluation (at market value) for financial statement purposes is for the preceding financial year-end prior to commencing the sale, it may be used for marketing or listing purposes.

4.6.5 Community Consultation

- Where appropriate, Council may engage the community for input on land disposals, particularly for properties with significant community interest or use.

4.7 Recording and Reporting

All disposals are recorded in Council's asset register, with disposals of portable and attractive items flagged for additional scrutiny. Gains or losses are recognised in financial statements per AASB 116, and outcomes are reported to Council.

5. ACCOUNTING TREATMENT

5.1 Derecognition of Assets

Assets are derecognised when no future economic benefits are expected, and their carrying amounts are removed from Council's balance sheet.

5.2 Gain or Loss on Disposal

The gain or loss is calculated as the difference between disposal proceeds and the asset's carrying amount, recognised in the income statement.

5.3 Impairment

If an asset is impaired before disposal, the impairment loss is recognised per AASB 136, ensuring an accurate carrying amount.

6. RESPONSIBILITIES

Estimated asset disposal limits for approvals:

- **Executive Managers** - estimated disposal value up to \$200,000
- **Directors** – estimated disposal value between \$200,001 and \$500,000
- **Executive Leadership Team** - estimated disposal value \$500,001 and \$1,000,000
- **Council**
 - estimated disposal value of greater than \$1,000,000 and/or
 - a community interest asset and/or
 - an asset disposal plan for a group of assets

Other responsibilities:

- **Executive Leadership Team:** Oversees disposal policy adherence.
- **Asset Custodians:** Identify assets for disposal, implement appropriate disposal methods, and ensure compliance.
- **Executive Manager Financial Services:** Maintains oversight of financial reporting for disposals.

7. DISPOSAL PROCEDURES

7.1 Decision to Dispose

Assets may be disposed of based on criteria including obsolescence, replacement needs, or non-compliance with safety standards.

7.2 Preparing Assets for Disposal

Staff must ensure assets are free from sensitive information or materials before disposal. Portable and attractive items must be securely cleared of any Council-specific branding or information.

7.3 Disposal Methods

- **Auction or Tender:** Preferred for high-value or risk-prone items.
- **List for Sale** – Land assets only with Council approval
- **Donations:** Limited to non-profit community groups via Expression of Interest or by Council resolution, following financial assessments.
- **Recycling or Destruction:** For assets deemed of negligible value.

Where applicable, a signed declaration should be sought from purchasers, noting that items are sold “as-is”, with no warranty implied.

8. CONFLICTS OF INTEREST

All asset disposal activities must be conducted in a manner that upholds the principles of integrity, impartiality, promoting the public good, commitment to the system of government, accountability and transparency to prevent actual, potential, or perceived conflicts of interest.

- Councillors, employees, and any other individuals involved in the disposal process must declare any conflicts of interest—whether financial, personal, or professional—before participating in asset disposal decisions.

- Individuals with a conflict of interest must not be involved in any aspect of the asset disposal process, including valuation, tender evaluation, auction procedures or approvals.
- Local government employees, councillors, and their close associates (including family members and business partners) are prohibited from purchasing assets directly from the council, unless through a publicly advertised, competitive process open to all members of the public, with any exemptions to this requirement (e.g. personal use electronic items such as mobile phones or tablets) to be approved by the Chief Executive Officer accompanied by formal documentation.

By adhering to these measures, the council ensures that asset disposals are conducted fairly, ethically, and in the best interest of the community.

9. LEGISLATIVE AND REGULATORY FRAMEWORK

This policy is consistent with:

- **Local Government Act 2009 including:**
 - **Section 104:** Accountability and transparency in asset disposal processes.
- **Local Government Regulation 2012, including:**
 - **Section 227:** Methods of sale (auction/tender).
 - **Section 236:** Exceptions to auction or tender.
- **Australian Accounting Standards Board:**
 - AASB 116 Property, Plant and Equipment
 - AASB 13 Fair Value Measurement
 - AASB 136 Impairment of Assets

9. RELATED DOCUMENTS

- Non-Current Asset Policy
- Code of Conduct
- Conflict of Interest
- Fleet Management Policy
- Library Collection Development Statement
- Procurement Policy
- Electrical Safety Regulation (for disposal of electrical items)

10. REVIEW

This Policy will be reviewed when related legislation/documents are amended or replaced, other circumstances as determined from time to time by Council or at intervals of no more than two years.

Version Control

Version Number	Key Changes	Approval Authority	Approval Date	Document Number
1	Original	Council	26/03/2025	#5151960

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TRANSFER OF EQUIPMENT

Parties

This agreement is made between the following parties:

1. **Fraser Coast Regional Council, ABN 19 277 850 689 of PO Box 1943, Hervey Bay QLD 4655**
(Transferor)
2. **The Commonwealth of Australia** as represented by the Bureau of Meteorology
ABN 92 637 533 532 of 700 Collins St, Docklands VIC
(Bureau)

Context

This agreement is made in the following context:

- A. In the 2023-24 Federal Budget, the Australian Government committed up to \$236 million over 10 years for the Bureau to address critical, long-standing risks in Australia's flood warning network as part of the Flood Warning Infrastructure Network Program (**FWIN Program**).
- B. As part of the FWIN Program, the Commonwealth will take ownership of a portion of Australia's flood observation network, focused on high priority assets in high priority catchments and including certain flood management assets. The ongoing maintenance and operations costs associated with these flood warning assets will be shared equally by the Commonwealth and each relevant state or territory.
- C. The purpose of this agreement is to transfer ownership of specific items of flood observation network equipment to the Bureau under, and for the purposes of, the FWIN Program.

1. Risk, title and property

- 1.1. On the Transfer Date, risk in, title to, and property in the Equipment immediately passes to the Bureau.
- 1.2. The Transferor must, within a reasonable time after receiving a written request from the Bureau:
 - (a) deliver any thing that is incidental to the Equipment that may be necessary for the operation or maintenance of the Equipment, including any keys, passwords manuals, schematics, documents and information;
 - (b) do all things reasonably necessary to provide the Bureau with the benefit of any warranties, guarantees or service agreements available to the Transferor in relation to the Equipment; and
 - (c) do all other things reasonably necessary to give effect to this clause 1.

2. Equipment Price

- 2.1. The Bureau must, within a reasonable time after receiving written demand from the Transferor, pay the Equipment Price to the Transferor.

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- 2.2. The Parties acknowledge and agree that if the Transferor makes the written demand contemplated by clause 2.1, then the Bureau does not have any discretion over whether or not to pay the Equipment Price to the Transferor.

3. Warranties

- 3.1. The Transferor warrants to the Bureau that:
- (a) it has the right to sell and transfer to the Bureau full and unencumbered title to and property in the Equipment; and
 - (b) it has disclosed to the Bureau all information about the Equipment that a person in the position of the Bureau would reasonably want to know, including any unusual features or risks associated with the Equipment.
- 3.2. The Bureau warrants to the Transferor that the transfer of ownership effected by clause 1.1 will not prevent the Transferor from having access to the data produced by the Equipment.

4. General

- 4.1. A variation of this agreement is only binding if agreed in writing and signed by the parties.
- 4.2. This agreement constitutes the entire agreement between the parties in respect of its subject matter.
- 4.3. A party may not assign any right under this agreement without the prior written consent of the other party.
- 4.4. This agreement may be executed in counterparts, all of which taken together constitute one agreement.
- 4.5. This agreement is governed by, and must be construed in accordance with, the laws of Queensland. Each party submits to the non-exclusive jurisdiction of the courts of Queensland and any courts which have jurisdiction to hear appeals from such courts.

5. Definitions

- 5.1. In this agreement:

Equipment means the equipment, items and things described in the Site Assessment/s under the heading "Findings - Equipment to be transferred to the Bureau under FWIN Program".

Equipment Price means \$1.00

Site Assessment means the FWIN Pilot Site Assessment Findings attached to this agreement at Attachment 1.

Transfer Date means the date this agreement is signed by the last party to do so.

[the next page is the signing page]

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SIGNING PAGE

Executed as an agreement.

SIGNED for and on behalf of the)
Commonwealth of Australia as)
represented by the Bureau of)
Meteorology by:)

Name *(please print)*

Signature

Date

SIGNED for and on behalf of **Fraser**)
Coast Regional Council by:)
)

Name *(please print)*

Signature

Date

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ATTACHMENT 1 – Site Assessment/s

Station Name	Station Number
Boompa Road Alert	540767
Glenwood (Mary River) Alert	540766
Howard Alert	40907
Musket Flat Mt Alert	40902
Pacific Haven Alert	40903
Railway Bridge Alert	40904
Takura Reservoir Alert	540268
Upper Cherwell Alert	40905
Walls Camp (Pacific Haven) Alert	540792

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FRASER COAST REGIONAL COUNCIL
ORDINARY MEETING NO. 8/25

WEDNESDAY, 27 AUGUST 2025

SUBJECT:	EXEMPTION UNDER S235(B) LOCAL GOVERNMENT REGULATION 2012 FOR THE PROVISION OF CONTROL SYSTEMS ENGINEERING SUPPORT
DIRECTORATE:	WATER & WASTE SERVICES
RESPONSIBLE OFFICER:	DIRECTOR WATER & WASTE SERVICES
AUTHOR:	OPERATIONAL TECHNOLOGY MANAGER
LINK TO CORPORATE PLAN:	Focused Service Delivery Effectively manage and maintain our assets to reduce asset failure.

1. PURPOSE

The purpose of this report is to seek a resolution from Council under *s235(b) of the Local Government Regulation 2012* to allow Council to enter an agreement without first inviting quotations.

2. EXECUTIVE SUMMARY

The Fraser Coast Regional Council (FCRC) has a large and complex control system that controls the operation of all water and sewerage treatment plants, pump stations, reservoirs and dams. To maintain, support and fault find this control system, Council employs a Control Systems Engineer. However, there are times when this engineer is unavailable after hours and during periods of leave and the Operational Technology Support Staff need additional control systems engineering support. During these occurrences Alliance Automation has been engaged due to their extensive experience with our bespoke hardware, system topology and technical procedures.

To ensure the Council Water and Sewerage Control System continues to function with minimal downtime this report seeks approval from the Council to make an exception under section 235(b) of the *Local Government Regulation 2012*, allowing Council to engage Alliance Automation Pty Ltd for the provision of engineering support services without first inviting written quotes from other Suppliers.

3. OFFICER'S RECOMMENDATION

That Council:

1. Resolve to enter into a contractual arrangement with Alliance Automation Pty Ltd without first inviting written quotes, pursuant to section 235(b) of the *Local Government Regulation 2012*, because it is satisfied that it would be impractical to invite quotes, as

engaging a new supplier would be highly resource-intensive and would result in extended downtime on Council's Water and Sewerage control systems.

4. BACKGROUND & PREVIOUS COUNCIL CONSIDERATION

Alliance Automation provides critical remote support for our water sewerage control systems when the Council's Electrical Support Engineer is unavailable. This service is essential to ensure timely repairs to faults within the Council's Water and Sewerage control systems. Though the Operational Technology Team has an extensive library of technical documentation for Council's Water and Sewerage control systems, some knowledge can be hard to document and must be learnt from practical experience.

Alliance Automation has worked with our Water and Sewerage control systems for over 17 years and has developed their experience with our bespoke hardware, system topology and technical procedures. Passing this knowledge onto a new Supplier so that they can assist in the timely rectification of control system faults would be a long and time-consuming process, with the slower resolution of control system faults occurring over the short to medium term.

A formal support agreement is necessary to ensure the contractor resources are available after hours at an agreed level of service.

5. PROPOSAL

That Council resolve to enter into a contractual arrangement with Alliance Automation Pty Ltd without first inviting written quotes, pursuant to section 235(b) of the *Local Government Regulation 2012*, because it is satisfied that it would be impractical to invite quotes, as engaging a new supplier would be highly resource-intensive and would result in extended downtime on Council's Water and Sewerage control systems.

6. FINANCIAL & RESOURCE IMPLICATIONS

The Control Systems Engineering Support agreement has been budgeted for in the Operational Technology Operating Budget at estimated \$120,000.

This report is seeking a procurement exception that Council resolves it is satisfied that engaging a new supplier for control systems engineering support would be impractical and disadvantageous to Council, and would result in extended downtime on Council's Water and Sewerage control systems in the short term.

The proposed arrangement would fall into the medium-sized category as per procurement policy and would be for an initial period of 12 months and extended as required until alternative suppliers that can provide comparable and responsive services to Council have been identified. Then a competitive tender process can be started.

A comparison of the quote from Alliance Automation against standard industry hourly rates confirmed that the agreement offers Council strong value for money.

7. POLICY & LEGAL IMPLICATIONS

The request for exemption has been undertaken in accordance with legislative requirements under Section 235(b) of the *Local Government Regulations 2012* and in accordance with the Procurement Council Policy.

8. RISK IMPLICATIONS

A risk assessment has been conducted which has identified a need for control systems engineering support when Council's Control Systems Engineer is unavailable after hours and during periods of leave.

Due to their long-term experience Alliance Automation is currently able to resolve issues in the network and treatment plants much quicker than alternative suppliers, and the team is actively working to remove this dependency over the next 12-36 months. Tendering now would increase the risk of extended service interruptions.

9. CRITICAL DATES & IMPLEMENTATION

A resolution will be required by Friday 29 August 2025 to ensure the continuation of control system engineering support by Alliance Automation.

10. CONSULTATION

Consultation has occurred with Council's Procurement team during the development of this report and have approved the exception (*CEOS083 – 25/26*).

11. CONCLUSION

Approval of the exception under section 235(b) of the *Local Government Regulations 2012* for Alliance Automation Pty Ltd to continue to provide control systems engineering support will ensure the current level of service to the residents of the Fraser Coast region with regards to water and sewerage systems availability.

12. ATTACHMENTS

Nil