

JRPP No.	Item 1 (2009STH008)
DA No.	DA 09/2023- Mobile Phone Telecommunications Facility - Lot 397 DP 755952 (No.42A) Yalwal Road, West Nowra
Applicant:	Telstra Corporation Pty Ltd
Report By:	Shoalhaven City Council

Assessment Report and Recommendation

Executive Summary

Reason for Consideration by Joint Regional Planning Panel

The application has been referred to the Joint Regional Planning Panel pursuant to clause 13 C (b) of the State Environmental Planning Policy (Major Development) 2005 as the development is greater than 13 metres in height and within the coastal zone.

Proposal

The development application seeks approval for a 3G mobile phone telecommunications facility comprising a thirty (30) metre monopole with three (3) panel antennas and an equipment shelter.

Permissibility

The site is zoned 4(a) (Industrial "A" (General) Zone) pursuant to the Shoalhaven Local Environmental Plan 1985 (SLEP 1985). The proposal is not listed as a prohibited use and is therefore permissible in this zone with development consent. The proposal while not being an industrial land use will not compromise the existing or potential future industrial development and in fact will assist industrial development through the provision of more reliable mobile telecommunications and wireless broadband. It is therefore consistent with objectives of the zone.

Consultation

The application was notified in accordance with Council's Community Consultation Policy and no submissions were received.

Main Issues

Contamination, bushfire, visual impact and the emission of radiation.

RECOMMENDATION

It is recommended that DA09/2023 be approved subject to the conditions contained in Attachment 'E'.

ASSESSMENT REPORT

1. Background

The current application was lodged on 6 August 2009. No formal Development Advisory Unit (DAU) meeting was had prior to the applications lodgement.

Council officers upon the lodgement undertook an assessment of the application and identified that as the development site was identified on Council records as potentially contaminated land (Council Reference – PCL 58) a Stage 2 Contaminated Land Assessment Report was required. The applicant was advised of the above by phone and letter on the 12 August 2009. The requested additional information was subsequently submitted by the applicant on 24 September 2009 (refer to *Environmental Site Assessment*, Prepared by Aurecon, Dated: 23 September 2009).

A review of Council's computer records/files has indicated that the subject parcel of land has had previous development and building applications lodged on it as summarised below:

- DA85/1748 – Car crushing/scrap metal yard. Approved 14 June 1985;
- DA01/1959 – Construction of a building to be used for storage purposes associated with car crushing and scrap metal yard. Approved 1 July 2002; and
- Amendment to the above consent (DS05/3335). Approved 20 March 2006.

2. Subject Site and Surrounds

The subject site is located on the northern side of Yalwal Road between Albatross Road and Depot Road, West Nowra. The site having a legal description of Lot 397 in Deposited Plan 755952 (No.42A), Yalwal Road, West Nowra. It:

- Is located southwest of the Nowra Central Business District (CBD);
- Is zoned 4(a) (Industrial "A" (General) Zone) under the Shoalhaven Local Environmental Plan 1985;
- Is adjoined by undeveloped crown land zoned 6(a) to the east, industrial land zoned 4(a) to the south that has partly been developed for industrial related uses, special uses land zoned 5(a) to the west which is being used as an Integral Energy Depot and residential 2(c) zoned land to the north that is currently undeveloped;
- Has a total area of 1.359 hectares of which the proposed development will occupy 105.6m²;
- Is identified as bushfire prone land and potentially contaminated land; and
- Contains no established vegetation and is currently being used as a scrap metal yard. This use was approved under DA85/1748.

Refer to **Attachment 'A'** for additional details on the site's location.

The development site has no direct frontage to Yalwal Road and is accessed via a unnamed Council service road. The closest residential property is No.7 Maybush Lane which is located approximately 123m from the development sites north western boundary with the closest sensitive land use being a Child Care Centre at No.53 Yalwal Road which is located 314m from the developments sites south western boundary and approximately 390m to the building (see **Attachment 'B'**).

3. Proposal

The submitted development application proposes the installation of a 3G mobile phone telecommunications base station comprising:

- A 30m high concrete monopole and an associated headframe with 3 panel antennas (maximum height of structure not to exceed 30m);
- An equipment building (2.28m wide x 3.28m long x 2.99m high);
- Security fencing (2.4m high) with access gates; and
- Associated power supply works and fibre optic cable works.

Refer to **Attachment 'C'** for a copy of the development application plans.

The applicant at this time has not applied for a Construction Certificate through Council and has not nominated Council as the Principal Certifying Authority.

4. Community Consultation

In accordance with Council's Community Consultation Policy the development application was notified as follows:

- Individual property owners within a 500 metre radius of the site were notified of the proposal (289 letters sent). The notification period was from 26/8/09 to 16/9/09;
- The proposal was advertised in the Local Press (South Coast Register) on 26/8/2009 and 2/9/09; and
- The application and supporting documentation were on display at Council's City Administrative Centre, Nowra as well as on Council's website.

No submissions were received by Council during the community consultation period.

5. Statutory Considerations

The following planning instruments and controls apply to the proposed development:

- i. State Environmental Planning Policy (Major Development) 2005;
- ii. State Environmental Planning Policy (Infrastructure) 2007;
- iii. State Environmental Planning Policy No.55 – Contaminated Land;
- iv. State Environmental Planning Policy No.71 – Coastal Protection;
- v. Deemed SEPP (Illawarra Regional Environmental Plan);
- vi. Shoalhaven Local Environmental Plan 1985 (as amended);
- vii. Development Control Plan No.18 – Car Parking Code;
- viii. Development Control Plan No. 93 – Waste Not (Site Minimisation and Management);
- ix. Shoalhaven City Council Section 94 Contribution Plan (as amended).

Additional information on the proposal's compliance with the above documents is detailed in Section 6 (Statement of Compliance/Assessment) of this report.

6. Statement of Compliance /Assessment

The following provides an assessment of the submitted application against the matters for consideration under 79C of the Environmental Planning and Assessment Act 1979 (EP&A Act).

(a) Any planning instrument, draft instrument, DCP's and regulations that apply to the land

i) State Environmental Planning Policy (Major Development) 2005 (SEPP 2005):

The provisions of SEPP 2005 apply to the proposed development as the facility is located within a 'coastal zone' and is greater than 13m in height. In accordance with the requirements of Clause 13C (Coastal development to which this part applies), Subclause (b) the submitted application is classified as 'regional development' with the determining authority for the application being the Joint Regional Planning Panel (Southern Region). The submitted application to be referred to the Joint Regional Planning Panel for determination in accordance with the applicable provisions of SEPP 2005.

ii) State Environmental Planning Policy (Infrastructure) 2007 (SEPP2007): The provisions of SEPP 2007 apply to the proposed development as the proposed facility is consistent with the SEPP definition of 'telecommunications facility'. In accordance with the requirements of SEPP 2007, the proposal does not satisfy the criteria of Clause 114 (Development permitted without consent) and therefore is considered as development permitted with development consent. The currently submitted application is seeking to obtain the required development consent.

iii) State Environmental Planning Policy No.55 - Remediation of Land (SEPP 55):

The provisions of SEPP 55 apply to the site as Council records identify the site as potentially contaminated land (Council Reference – PCL 58). Clause 7 of SEPP 55 outlines the matters to be considered in determining development applications involving contamination/remediation issues. An Environmental Site Assessment (Prepared by: Aurecon, Dated: 23/9/09, Ref: 25860/S255174-ESA, Revision: 0) has been provided by the applicant (including soil sampling) which provides an investigation of the development site in accordance with the contaminated land planning guidelines and associated documentation. The submitted Environmental Site Assessment has identified contaminants in the soil in the area where the development is proposed which exceed the adopted health investigation levels for the intended land use. The main area of contamination involving the upper layer of fill/soil on the site where concentration levels of vanadium, lead and benzopyrene above the adopted site criteria were identified. Specifically these levels exceeded the threshold for restricted waste and general solid waste respectively. A review of the documentation submitted has been undertaken by Council's Environmental Health Officer who has advised that the report is thorough and addresses the relevant Australian Standards and Department of Environment and Climate Change (DECC) Criteria for the assessment of land contamination. No concerns were raised with the findings of the submitted report subject to the imposition of conditions specifically relating to the management of waste material on site (i.e. to be carried out in accordance with NSW DECC Environmental Guidelines: Classification and Management of Liquid and Non-Liquid

wastes), preparation of a soil (sediment/erosion) management plan and environmental (stormwater) management plan and further sampling being undertaken if during construction visual or otherwise clear identification of further land contamination is identified.

Further to the above, the proposed works are not affected by the requirements of Clause 9, 10, 12, 13, 15, 16 and 17 of SEPP 55.

iv) State Environmental Planning Policy No.71 – Coastal Protection (SEPP 71): The provisions of SEPP 71 apply to the site. The subject site being within the ‘coastal zone’ as defined by SEPP71 (i.e. one kilometre landward of the western boundary of coastal waters). SEPP 71 requires Council to take certain matters into account when determining a development application that is located within the coastal zone. The clauses/matters contained in the SEPP71 that have relevance to this application are overviewed below:

- Part 2 (Matters for consideration) Clause 8 (Matters for consideration): It is considered that the proposal is consistent with the requirements of this clause as:
 - It does not impact or impinge on public access to or along the coastal foreshore;
 - It is located approximately 1km landward of the coastal foreshore (i.e. Shoalhaven River). As such it is considered to be suitable development having regard for existing surrounding land uses;
 - It will not lead to excessive overshadowing of foreshore areas;
 - It will not diminish the scenic qualities of the area;
 - It will not have an adverse impact upon flora and fauna;
 - It will not impact upon wildlife corridors;
 - It will not lead to a conflict between land based and water based coastal activities;
 - It will not impact upon the water quality of coastal waterbodies; and
 - The proposal will not impact upon aboriginal heritage.
- Part 4 (Development Control) Clause 13 (Flexible zoning provisions): Flexible zoning provision clauses in the Shoalhaven Local Environmental Plan do not impact upon/apply to this development site;
- Part 4 (Development Control) Clause 14 (Public access): It is considered that the proposed development will have no impact upon public access to or along the coastal foreshore given the development sites location away from any foreshore areas;
- Part 4 (Development Control) Clause 15 (Effluent disposal): No effluent disposal is proposed as part of this application; and
- Part 4 (Development Control) Clause 16 (Stormwater): It is considered that the proposed development will not result in untreated stormwater being discharged into the sea, a beach, or an estuary, a coastal lake, a coastal creek or other similar body of water, or onto a rock platform.

Other parts of SEPP 71 which relate to “significant coastal development” and “master plans” do not apply to the proposed works. In summary it is considered that the proposed development does not conflict with the aims and applicable provisions of SEPP 71.

v) Deemed State Environmental Planning Policy - Illawarra Region Environmental

Plan (IREP): The subject land is affected by the provisions of Deemed State Environmental Planning Policy - IREP. An assessment against the requirements of the IREP has indicated that the subject land is not identified as a wildlife corridor, land of prime crop and pasture potential, land supporting rainforest vegetation, land containing extractive materials, land containing coal resources or land that is part of the sub regional commercial centre. It is however identified as land with landscape or environmental attributes.

The clauses/matters contained in the IREP that have relevance to this application are overviewed below:

- Clause 3 of the IREP contains the aims and objectives of the plan. It is considered that the submitted proposal does not conflict with the general aims and objectives as outlined in this clause;
- The Regional Landscape and Environmental Study: The IREP contains no specific provisions that apply to land with “landscape and environmental attributes”. The Regional Landscape and Environmental Study that supports the IREP provides specific recommendations for broad areas of the south coast, including the West Nowra area. In terms of the area within which the subject site is located, the study identifies the area as ‘Ve’ Development Control (although the boundary line separating this area from adjoining areas is unclear on the maps Council has). As the development is within the existing urban zoned area of Nowra and this area has no recommendations for change the subject application complies with the requirements.

In summary, it is considered that the proposal does not conflict with the relevant provisions of the IREP and will achieve the applicable outcomes. It should be noted that the proposal is not affected by the provisions of Clause 139 (Development applications-high rise buildings) as the height requirement of 11 metres contained in this clause relates to buildings not structures.

vi) Shoalhaven Local Environmental Plan 1985 - as amended (SLEP 1985): The provisions of SLEP 1985 apply to this site. The clauses/matters contained in SLEP 1985 that have relevance to this application are overviewed below:

- Clause 2 (Aims and objectives): It is considered that the submitted proposal satisfies the general aims and objectives as outlined in this clause;
- Clause 9 (Zone objectives and development control table): The subject land is zoned 4(a) (Industrial “A” (General) Zone) under SLEP 1985. The proposed development as described on the development application form (mobile phone telecommunication facility) is not listed as a prohibited use and is therefore permissible within the zone subject to development consent from Council;
- Clause 28 (Danger of bushfire): A review of Council’s Bushfire Prone Lands Map has indicated that the subject site is identified as bushfire prone. The applicant has not submitted a bushfire assessment as part of the application, however it is considered that, as the structures to be built are not habitable and as the proposal is not classified as ‘critical infrastructure’, that the applicant has provided sufficient detail. An assessment against the requirements of *Planning for Bushfire Protection*

2006 and Clause 28 (1), (2), (3) and (4) has been undertaken by the Rural Fire Service (RFS) and Council. From this assessment, it is considered that the position of the building in relation to the fire source (i.e. currently a minimum of 20m separation distance to dominant woodland on the adjoining land to the east, with there being no direct fire path to the structure) is satisfactory and measures exist and/or can be implemented to mitigate the threat from bushfire (i.e. defensible space, construction materials, etc). In addition, it is considered that the proposal satisfies the objectives of *Planning for Bushfire Protection 2006* and should not result in a significant adverse impact on service personal or emergency services. The RFS advising that they had no concerns with the proposed development subject to the imposition of a recommended conditions on any issued development consent relating to the provision of unobstructed pedestrian access around the shed, maintenance of the property as an IPA, maintenance of fine fuel build up, level 1 construction, provision of draft excluders or weather strips, screening of vents and weep holes and use of non combustible fencing. However, the RFS has also advised there is a potential for the combined effects of flame contact, radiant heat and convective heat exposures to overwhelm the building material and impact upon the structure and contents. This to be provided as 'general advice to the applicant' on any issued development consent. In addition, both Council and the RFS are satisfied that there will be no works, such as an asset protection zone, required on adjoining lands. As such, it is considered that there is sufficient defensible space available around the proposed building and measures can be put in place to maintain and reduce fuel loads in close proximity to the building and fine fuel build up can be maintained/managed to minimise the impact of bushfire attack; and

- Clause 37A (Notification of certain development): The submitted application was notified in accordance with Council's Community Consultation Policy. Refer to Community Consultation section of this report for further details.

In summary, it is considered that the proposed development does not conflict with the aims and relevant provisions of SLEP 1985.

vii) Development Control Plan No.18 – Carparking Code (DCP 18): The proposed development does not require the formal provision of car parking within the site. The applicant advising that vehicles required to service the site for on-going maintenance will be a mixture of two wheel drive station wagons/sedans and four wheel drive sedans. Sufficient space currently exists within the site to allow construction and maintenance vehicles to enter the site, manoeuvre and exit the site in a forward direction. The existing areas adjacent to the proposed development that will be used for manoeuvring are gravel and considered satisfactory for the intended usage.

viii) Development Control Plan 93 - Controls for Waste Minimisation and Management (DCP 93): The provisions of DCP 93 apply to this development. A waste minimisation and management plan (WMMP) for the construction and the on-going use of the proposed development has not been submitted with the development application. In accordance with the requirements of DCP 93, a WMMP is not required to be lodged at the development application stage and can be lodged prior to the release of the Construction Certificate. Given the site has been identified as containing

contamination, concerns are raised with the disposal of excavated material off-site. As per the recommendations in the provided Environmental Site Assessment, any excess material to be disposed of off-site must be stockpiled, sampled and analysed by a suitably trained environmental scientist or engineer prior to its removal from the site to determine its waste classification and appropriate place for disposal.

As such, it is considered that the proposed development does not conflict with the aims and relevant provisions of DCP 93, subject to the imposition of conditions on any issued development consent requiring a WMMP to be prepared prior to the issue of a Construction Certificate and disposal off site of excavated material having regard for the issue of contamination.

- ix) Shoalhaven City Council Section 94 Contribution Plan (as amended):** Council's Section 94 Contribution Plan applies to industrially zoned land (i.e. bushfire and administration related contributions). As the portion of the site to which this application relates has been previously developed, and as the new proposed use will not result in an intensification of the usage of the site over that previously approved no opportunities exist for the levying of additional/new contributions on the current application.

(b) likely impact of that development on the natural and built environment and social and economic impacts in the locality.

- **Threatened Species:** A review of Council records has indicated that there are no records of endangered flora or fauna within 400m of the subject land. The site of the proposed development is located within land that is currently used for industrial purposes, has been previously heavily disturbed (i.e. currently 100% developed) and contains no established native/natural vegetation. A pro-forma Threatened Species Preliminary Site Assessment has been undertaken (copy on file) and has confirmed that given the current level of disturbance on the site that no threatened flora/fauna will be impacted upon directly or indirectly and as such no further assessment is required.
- **Traffic and Access:** Access to the site from Yalwal Road is via an unnamed council road. The access as currently provided is constructed to a suitable standard and is of a sufficient width to accommodate construction and service/maintenance vehicles. Once constructed, vehicle generation is estimated to be one vehicle a week. As such, no additional works are required.
- **Noise:** Some noise will be created during the construction phase of the development. Given the separation that exists to the nearest sensitive receiver/residential property (approximately 123m) and the land uses that exist between the proposed development and the nearest sensitive receiver/residential property, it is considered that construction noise generated should not adversely impact adjoining lands. However, any adverse impact can be minimised through the imposition of a condition on any issued development consent limiting construction hours.

In terms of ongoing noise, it is anticipated that that the development once operational will not generate any noise and given the separation from the closest residential property boundary, no impact should be had. Any issued development consent should

however be conditioned so as to limit any ongoing noise generated at the boundary of the nearest effected residence.

- **Context and Setting:** The proposed tower given its height will be visible from certain locations. The applicant has submitted a visual impact assessment (including photomontages) as part of this application. This has included consideration of issues such as scale, shape, material selection, presence of existing infrastructure, position in the skyline and shielding available. The applicant in part has advised that:

“Surrounding land use, buildings, vegetation and the specific siting, design and coloring of the installation will limit the visual impact of the monopole from all perspectives”

While it is accepted that the pole will be visible from certain locations, it is considered that it will be partially to wholly screened by the existing vegetation to the south and east when one is in close proximity to the proposed structure (i.e. less than 500m). The houses located closest to the facility in Maybush Way (i.e. to the west of the proposed facility) will have direct views of the proposed monopole looking east. Visual impacts are however interrupted by the adjoining land uses which include industrial buildings, electrical transmission infrastructure and electrical poles. The equipment building and security fencing being positioned on the site so they cannot be seen from the adjoining residential land to the west. As such, it is considered that the outlook from these properties will not be substantially altered due to the industrial uses of the land that these residential properties back onto.

From a distance (i.e. 500m to 5km from the site) views of the proposed structure will be largely restricted by the existing vegetation and natural topography. Given the presence of large amounts of the existing established vegetation to the north, south and east of the site (i.e. Crown land), it is considered that the eye would not be drawn to the structure when it is visible, therefore the proposal will not significantly alter the landscape or impact upon the existing visual amenity from a distance.

It is acknowledged that the proposed development will have a visual impact on this locality. It is, however, considered that this impact will be minimal as the site's location provides significant screening. In summary, it is considered that the monopole structure should not have a negative impact on the quality of the environment at this location, nor does it detract from its significant features. Any impact is seen as acceptable having regard for the improved phone and wireless internet coverage that this development will provide to the area. As such, it is considered that the proposed development should not be refused on the grounds of visual impact.

- **Social Impacts:** The proposed development will provide improved mobile phone coverage and wireless internet coverage to the surrounding areas. During the construction phase, the proposed development will result in a small increase in traffic along Yalwal Road. It is considered that Yalwal Road is capable of dealing with the increased traffic generated. As discussed above, the proposed development will have a potential visual impact given the development will be able to be seen from some adjoining land (i.e. to the west). However, it is considered that, given the sites location within industrial zoned land and adjacent to an Integral Energy Depot, any visual

impact will be minimal. In addition, the discharge of electro magnetic emissions (EME) and its associated health impacts is considered a potential social impact. The proposal as currently submitted is compliant with applicable regulations in relation to EME emissions, with the predicated EME levels being significantly below the Australian Communications and Media Authority Standard. Any issued development consent to be conditioned so as to require certification that the facility prior to the commencement of operations is complying with the predicated EME levels as well as requiring the provision of a validation report within 12 months of the facility commencing operations so as to ensure levels are not exceeding the predicated EME levels. Additional discussion on some of the above issues is provided below in Section 7 (Other Issues).

In summary, it is considered that the proposed development, based on the information that has been submitted, will have minimal adverse social impact.

- **Economic Impacts:** The proposed development will have a positive economic impact during the construction phase in that it will create some short term employment opportunities. In the longer term, it is considered that the improved mobile phone and wireless internet coverage for the area would provide a benefit to the local community's economy as it will make available an additional service to the local community, tourists and business people which is currently not available or if it is available not of an acceptable standard. Improved mobile phone and wireless internet coverage will also increase the communication abilities of the local emergency service organisations which in turn has the potential to facilitate greater efficiency and reliability in their service.
- **Sediment and Erosion Control:** Minimal works are proposed as part of this application at ground level. There will however be a need to ensure that during the construction of the proposed development the site is adequately managed to control water and soil. A erosion and sediment control plan (ESCP) has not been submitted as part of this application however, any issued development consent will be conditioned so as to require an ESCP prepared by a suitably qualified/experienced person and based on the Landcom manual *"Soils and Construction, Managing Urban Stormwater, Vol 1 4th Edition, March 2004"* to be submitted and approved prior to the issue of a Construction Certificate. The plan needs to be prepared to have regard for soil contamination issues as outlined in the submitted Environmental Site Assessment. In addition, a condition will be imposed requiring the proposed measures to be installed prior to the commencement of any works so as to ensure that no sediment and/or contaminated material leaves the site.

(c) the suitability of the site for the development

The proposed development is located within industrial zoned land and is considered to be positioned a satisfactory distance from the nearest residential property (No.7 Maybush Way - approximately 123 metres to the boundary and 146m to the dwelling) and nearest community sensitive site (Echidna Pre-School at No.53 Yalwal Road - approximately 314 meters to the boundary and 390 metres to the building). In addition, the site allows for co-location opportunities for future expansion and will not constrain the currently available development potential of adjoining lands. The site as proposed also meets Telstra's coverage objectives which will ensure it provides good quality telecommunication coverage

for the area. As such, it is considered that the site is suitable for the proposed development.

(d) any submissions made in accordance with the Act or the regulations

The application was notified by way of a public notification as outlined in Section 4 (Community Consultation). No submissions were received.

(e) the public interest

Refer to point (d) above.

7. Other Issues:

- **Telecommunications Legislation/Requirements:** The activities proposed by this application are subject to a range of Federal legislation which includes the *Commonwealth Telecommunications Act, 1997*, *Telecommunications Code of Practice 1997*, *Telecommunications Low Impact Determination 1997*, *Telecommunications Regulations 1997* and the *Australian Communications Industry Code of Practice 2004 (C564:2004)*. The proposal under the above legislation is not classified as a “low impact facility” (i.e. no development approval required) and is therefore classified as a “high impact” determination and subject to the provisions of the EP&A Act. In accordance with the Code of Practice, the applicant has applied the precautionary principles in respect of site selection, designing the infrastructure and operation of the site in order to demonstrate compliance with the regulations regarding maximum human exposure limits for radio frequency fields and to take appropriate measures to restrict general public access to the radio frequency hazard areas.
- **Electro magnetic emissions and associated health impacts:** The emission of radiation from the tower (electro magnetic emissions-EME) and associated health impacts is an issue that needs to be considered as part of this application’s assessment. The applicant in their submitted Statement of Environmental Effects has advised that outputs from the proposed facility would be well below the limits defined by the *Radiocommunications (Electromagnetic Radiation – Human Exposure) Standard 2003* prepared by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA). ARPANSA being the Federal Government agency charged with the responsibility for protecting the health and safety of people and the environment from the harmful effects of radiation. The limits as set by ARPANSA have been subsequently set by Australian Communications and Media Authority (ACMA) who administer the Commonwealth legislation and associated regulations. The compliance report provided, which uses the ARPANSA standard methodology, predicts the maximum levels of radiofrequency EME from the proposed installation, once it is operational, will be 0.12% of the ACMA mandated exposure limit. The above estimate being expressed as a percentage of the ACMA mandated exposure limit (100% being the maximum allowable exposure limit). The estimation provided assuming a worst case scenario. That is with:
 - base station transmitters operating at maximum power (no automatic power reduction),
 - Simultaneous telephone calls on all channels,
 - An unobstructed line of sight view to the antennas.

Documentation that ARPANSA currently have available contains the following statements in relation to mobile phone base station antennas:

“Mobile phone base stations and telecommunications towers produce weak radiofrequency (RF) electromagnetic energy (EME) exposure levels. The weight of national and international scientific opinion is that there is no substantial evidence that RF emissions associated with living near a mobile phone base station or telecommunications tower poses a health risk.

Current research indicates that....RF radiation is not known to have any adverse health effects.

While human studies to assess the possibility that RF exposure increases the risk of cancer are few in number, laboratory studies do not provide evidence to support the notion that RF fields cause cancer.

No adverse health effects are expected from continuous exposure to the RF radiation emitted by the antennas on mobile telephone base station towers.”

While it is acknowledged that the table of predicated maximum EME levels provided by Telstra for this proposed facility shows that the highest EME level (0.12% of the exposure limit) is reached at a distance of 193m from the proposed facility, it also needs to be acknowledged that this level is 833 times less than the exposure limit for continuous exposure of the general public to radiofrequency EME from mobile phone base stations in the standard declared by the Australian Communications Authority.

Mobile phone base stations such as the one proposed are required to comply with the public exposure limits in the ARPANSA standard. Surveys and research undertaken by ARPANSA have shown that working base stations operate well below exposure limits specified in the ARPANSA standard. As part of the applications assessment advice was sought from Council's Communication and Electrical Services Manager who has outlined that the figures that have been provided with this application assume a near worst case scenario and, in practice, the EME levels will be less due to:

- Trees and buildings obstructing line of sight to the antennae; and
- Not all transmitters, in normal conditions, running at maximum power at the same time.

In addition, a review of several Land and Environment Court judgements relating to the provision of telecommunication facilities (similar to what is currently proposed) has indicated that the court, has found that it was not appropriate for them to set aside or disregard the existing safety standards (i.e. the ARPANSA standard) nor is it appropriate for the court to create its own standards. As such, the court has ruled that it is appropriate for safety standards to be set by authorities with special expertise such as ARPANSA. The above being reflected in a decision (*Telstra Corporation Limited v Hornsby Shire Council (2006) NSWLEC 133*) where the court specifically in relation to EME levels and whether the proposed levels will harm the health and safety of residents, stated that Councils should adopt the ACMA standard (i.e. the ARPANSA standard) when measuring and determining EME levels, given that it was the ACMA that has the responsibility for

ensuring that exposure limits do not adversely affect the health and amenity of the community.

The proposal as submitted is compliant with current regulations/requirements in relation to EME emissions, with the predicated EME levels being significantly below the Australian Communications and Media Authority Standard. As such, it is considered that the proposed development, based on submitted information, is satisfactory and should not be refused on the grounds of electro magnetic emissions and associated health impacts.

- Co-location of facilities: The *Australian Communications Industry Code of Practice 2004 (C564:2004)* encourages the use of existing telecommunication sites to mitigate the effects of multiple facilities. The applicant in the submitted Statement of Environmental Effects has outlined that they have investigated the opportunity to collocate on existing telecommunication sites in the area (i.e. Nowra Police Station, Integral Energy Depot, Shoalhaven City Council Emergency Operations Centre). Their assessment of these sites indicating that they do not provide the desired coverage objectives. This being due primarily to their distance from the proposed coverage area and/or the radio signal being blocked by natural topography. As such, co-location is not seen as a viable option.

The proposed site will however, provide an opportunity for co-location. Any co-location on this site may not require development consent as it could be classified as “low impact” under the schedule to the *Telecommunications (Low Impact Facility) Determination 1997*. In terms of additional impacts from the provision of further facilities, Council’s Communications and Electrical Services Manager has advised that *“If additional mobile phone carriers come onto this tower in the future the EME level will increase as a cumulative sum of the transmitter radiated powers. However, even with 3 carriers the total EME level at any location away from the tower will still be a very small percentage of the ARPANSA limit.”* Given the land that has been made available for the lease to Telstra, it is unlikely that any more than two carriers would be able to locate on this facility as sufficient space for the ancillary infrastructure would not be available.

- Investigation of alternative sites: The applicant as part of their assessment process has considered a number of alternative sites. The submitted Statement of Environmental Effects outlining that eight (8) alternative sites have been investigated (see **Attachment ‘D’**). The applicant advising that there are a number of requirements that need to be addressed in site selection process. These include but not limited to:
 - Landowner’s consent;
 - consideration of adjacent sensitive land uses;
 - visual amenity, design feasibility;
 - ability to co-locate in the future;
 - environmental impacts;
 - conformance to appropriate RF coverage objectives; and
 - ability to achieve community and council preferences.

The code applying to telecommunication facilities encourages the use of existing sites to mitigate the effects of facilities (i.e. on the landscape). Based on information that has been provided by the applicant, Council staff are satisfied that sufficient investigation of alternative sites has been undertaken. At this time, as consent from current land owners

cannot be obtained and/or minimum required coverage could not be achieved, the current site appears to provide the best opportunity for coverage while having minimal visual impact.

- Flooding: The subject site is not identified as being flood prone on Council's mapping. As such, no further assessment has been undertaken.
- Construction Materials: The equipment shelter associated with the development is to be constructed from colorbond panels and is to be cream in colour. Fencing around the site will be galvanised chain wire fencing. It is considered that these materials are satisfactory given the fence and shelter structure will be out of the line of site of the residential properties to the west.
- Easements/Restrictions on the use of the land: No Deposited Plan or Section 88B instrument currently exist for the subject land as it is identified as a parish portion. A title search has however been undertaken and identified that the land is burdened by one easement. This being an easement for transmission line. The area of the proposed works being clear of this easement.

8. Referrals

Internal:

- Building Surveyor: No objection to the proposal subject to the imposition of recommended conditions on any issued development consent (i.e. PCA and CC requirements).
- Development Engineer: No objection to the proposal and no recommended conditions to be imposed on any issued development consent.
- Environmental Health Officer: No objection to the proposal subject to the imposition of recommended conditions on any issued development consent (i.e. preparation of a sediment and erosion control plan, management of waste material on site in accordance with DECC Environmental Guidelines).
- Communication and Electrical Services Manager: Verbal response received. No objection.
- Shoalhaven Water: No objection to the proposal and no recommended conditions to be imposed on any issued development consent.

External:

- Rural Fire Service (RFS): No objection to the proposal and have provided of a number of recommended conditions that should be imposed on any issued development consent (i.e. provision of pedestrian access around the shed, design/construction requirements and property to be managed as an IPA).
- Department of Defence: No objection to the proposal and no conditions recommended for imposition on any issued development consent.

9. Options

The Joint Regional Planning Panel may:

- a) Resolve to approve the application subject to conditions (i.e. adopt the recommendations of this report including the draft conditions of consent provided or modify the provided conditions); or
- b) Resolve to refuse the application (i.e. on the grounds that the submitted proposal has an unsatisfactory visual impact and will have adverse health impacts); or
- c) Write to the applicant requesting them to amend/modify the proposal and subject to the matters being satisfactorily resolved a further report be submitted to the Joint Regional Planning Panel (Southern Region) for its consideration.

It will be noted from the above report, staff have concerns in regard to Council's ability to defend a decision based on adverse visual or health impacts (point b above).

10. Conclusion

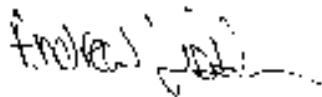
This application has been assessed having regard to the Matters for Consideration under Section 79C of the Environmental Planning and Assessment Act 1979. Following a detailed assessment, it is considered that Development Application No DA09/2023 should be supported subject to suitable conditions being imposed on any issued development consent.

11. Recommendation

RECOMMENDED that, in respect of DA09/2023 for the proposed mobile phone telecommunications facility at Lot 397 DP 755952 (No.42A) Yalwal Road, West Nowra, the application be approved as an operational development consent subject to conditions as contained in **Attachment 'E'**.

Signed:

date: 5/11/09



Andrew Lissenden

Attachment ‘A’

Attachment ‘B’

Attachment ‘C’

Attachment ‘D’

Attachment ‘E’

PART A

CONDITIONS OF A GENERAL NATURE, INCLUDING A DESCRIPTION OF THE PROPOSED DEVELOPMENT

General

1. This consent relates to a **mobile phone telecommunication facility (comprising a 30m high monopole and associated headframe with 3 panel antennas, an equipment building, security fencing and associated power supply/optic cable works** as illustrated on the plans with the following references:

- DWG No. N108606 (Site Layout and Access), Sheet No. S1, Issue: 2, Dated: 23.4.09;
- DWG No. N108606 (Site Elevation), Sheet No. S3, Issue: 2, Dated: 23.4.09;

specifications and supporting documentation (Planning Report prepared by Urbis, Ref No: NA04405.01, Dated: August 2005 and Environmental Site Assessment prepared by Aurecon, Ref No: 25860/S255174-ESA, Dated: 23 September 2009) stamped with reference to this consent, as modified by the following conditions. The development shall be carried out in accordance with this consent.

Notes:

- *Any alteration to the plans and/or documentation shall be submitted for the approval of Council. Such alterations may require the lodgement of an application to amend the consent under s96 of the Act, or a fresh development application. No works, **other than those approved under this consent**, shall be carried out without the prior approval of Council.*
 - *Where there is an inconsistency between the documents lodged with this application and the following conditions, the conditions shall prevail to the extent of that inconsistency.*
2. The approved development/use shall not commence until all relevant conditions of development consent have been met or unless other satisfactory arrangements have been made with council (i.e. a security).

Occupation Certificate

3. An **Occupation Certificate** shall be issued by the Principal Certifying Authority (PCA) before the approved building/development is used or occupied.

Note: Refer to Part F of this development consent for additional requirements in relation to this condition.

CONDITIONS THAT MUST BE COMPLIED WITH BEFORE WORK CAN COMMENCE

Notice of commencement

4. Notice must be given to Council **at least two (2) days** prior to the commencement of building work.

Principal Certifying Authority/Construction Certificate

5. The following must be undertaken **before any building works can commence**:
- a) A Principal Certifying Authority (PCA) must be appointed; and
 - b) A Construction Certificate must be obtained from either Council or an accredited certifier.

Builders' toilet

6. Before commencing building operations, a builder's water closet accommodation must be provided to Council's satisfaction. A chemical toilet may be used on the site or alternatively the site may be provided with temporary closet accommodation connected to Council's sewer where sewer is available and operational.

Under no circumstances will pit toilets or similar be accepted by Council.

Existing services and damage to public assets

7. Prior to the commencement of any work(s) associated with this development:
- a) The developer or his agent shall undertake a site inspection of the adjacent kerbs, gutters, carriageway, reserves and the like and document evidence of any damage to existing assets. Failure to identify existing damage will result in all damage detected after completion of the building work being repaired at the applicant's expense. Any damage to the adjacent kerb, gutter, footpath/road reserve area, carriageway and the like that occurs during development works shall be repaired by the applicant; and
 - b) The developer or his agent must check that the proposed works are not affected by any Council, Integral Energy, telecommunications, gas service or other services. Any required alterations to services will be at the developer's expense.

Soil and water management

8. The relevant sedimentation and erosion controls required by this consent (refer to Condition 10) must be implemented **prior to commencement of any work** and maintained until the work is completed and the site stabilised. Soil and water management including siltation and erosion controls shall be inspected and approved prior to the commencement of any site works.

Supervision of works

9. **Prior to the commencement of any works**, Council shall be advised in writing of the name of a designated person/company nominated by the applicant to be responsible for construction of all engineering works including erosion and sediment control measures.

PART C

CONDITIONS THAT MUST BE COMPLIED WITH BEFORE A CONSTRUCTION CERTIFICATE CAN BE ISSUED

Erosion and sediment control plan

10. An Erosion and Sediment Control Plan (ESCP) and accompanying specifications for the construction phase of the works, prepared by a suitably qualified/experienced person

and based on the Landcom manual "*Soils and Construction, Managing Urban Stormwater, Vol 1 4th Edition, March 2004*", shall be lodged for approval with the application for a Construction Certificate. The ESCP shall include, but not be limited to the following:

- a) The location and type of proposed erosion and sediment control measures;
- b) Detail environmental (stormwater) management measures that will be implemented; and
- c) Detail on measures to be put in place to ensure contaminated material does not impact on adjoining lands.

The ESCP controls must be implemented, inspected and approved prior to the commencement of any site works.

Waste minimisation and management

11. A Waste Minimisation and Management Plan (WMMP) must be prepared that complies with the requirements of Development Control Plan No. 93 – Waste Minimisation and Management. The plan must clearly detail how the management of waste material(s) on site will be carried out in accordance with NSW DECC *Environmental Guidelines: Classification and Management of liquid and Non-liquid Wastes*.

The WMMP shall be lodged for approval with the application for a Construction Certificate. A copy of the approved WMMP shall be lodged with Council prior to the issue of the Construction Certificate.

Note: "Waste" has the same meaning as the definition of "Waste" in the *Protection of the Environment Operations Act 1997*.

PART D

CONDITIONS RELATING TO THE APPROVED WORK AND SITE MANAGEMENT

Building Code of Australia

12. All building work must be carried out in accordance with the requirements of the Building Code of Australia.

Note: *This condition is prescribed under the Environmental Planning and Assessment Regulation 2000.*

Design and construction

13. All design and construction shall be in accordance with DCP 100 – Subdivision Code.
14. New construction shall comply with the following:
- a) Australian Standard AS3959-1999 'Construction of buildings in bush fire-prone areas' Level 1;
 - b) External doors are to be sealed with draft excluders or weather strips to prevent the entry of embers;
 - c) Vents and weepholes shall be screened with corrosive resistant steel mesh with an aperture not greater than 1.8mm; and
 - d) All new fencing shall be non-combustible.

Asset protection zones

15. To ensure radiant heat levels are below critical limits and to prevent direct flame contact with the approved development, the following is to be undertaken:
- a) A defensible space that permits unobstructed pedestrian access is to be provided around the building so as to allow emergency personnel and other persons to undertake property protection activities;
 - b) The ground surface around the approved development (i.e. within the entire compound and outside the fenced area to two (2) meters or the maximum distance achievable) shall be free of vegetation and/or covered in rock or crushed grit so as to minimise fine fuel build up; and
 - c) At the commencement of building works the entire property shall be managed as an inner protection area (IPA) as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bushfire Protection 2006' and the NSW Rural Fire Service's document 'Standards for asset protection zones'.

Soil and water management

16. All practical measures must be taken to ensure erosion and subsequent sediment movement off-site does not occur.

All silt fences or equivalent must be regularly inspected and cleaned out and/or repaired as necessary and all collected silt must be disposed of to the satisfaction of the Principal Certifying Authority (PCA).

Unnecessary disturbance of the site (eg excessive vehicular access) must not occur.

Waste minimisation and management

17. All waste must be contained within the site during construction and then be recycled in accordance with the approved Waste Minimisation and Management Plan (WMMP) or removed to an authorised waste disposal facility (i.e. West Nowra Tip). No waste shall be placed in any location or in any manner that would allow it to fall, descend, blow, wash, percolate or otherwise escape from the site.

Compliance with the WMMP shall be demonstrated by the retention of relevant receipts. These must be submitted to Council, upon request.

18. All excavated surplus material shall be hauled to an approved landfill site.

Contamination

19. During construction where there is visual evidence or otherwise clear identification of further land contamination (e.g. layers of ash or strong hydrocarbon odour, etc) further sampling and chemical analysis must be carried out to confirm the magnitude and extent of contamination and a suitable removal strategy developed in regard to waste classification and disposal. These works to be undertaken in accordance with the NSW DECC *Environmental Guidelines: Classification and Management of liquid and Non-Liquid Wastes*.

Construction hours/storage

20. To limit the impact of the development on adjoining owners/occupiers, the following must be complied with:

- a) All construction work shall be restricted to the hours of 7.00am to 6.00pm Monday to Friday and 8.00am to 1.00pm Saturdays. No construction work shall take place on Sundays or Public Holidays; and
- b) The parking of machinery/vehicles or the storing of construction equipment/materials, soil, spoil, or rubbish external to Lot 397 DP 755852 is prohibited.

Electromagnetic energy levels

21. The applicant is to provide certification of the operation of the communication facility in accordance with the approved electromagnetic energy (EME) levels, prior to commissioning of the facility (i.e. levels at distances from the facility do not exceed the predicated EME levels in the submitted EME Report, Dated 2/7/09, NSA Site No. 2541010).

Exterior materials/colour schedule

22. a) The development must be constructed in accordance with the approved schedule of colours and building materials and finishes; and
- b) Exterior materials are to be non-reflective and of a texture and colour which blend with the existing surroundings.

PART E

CONDITIONS THAT RELATE TO ONGOING MANAGEMENT OF THE PROPOSED DEVELOPMENT

Site management and maintenance

23. The proprietor shall at all times be responsible for on-going site management and maintenance in accordance with the following:
 - a) The use of the approved development must not:
 - Cause transmission of vibration to any place of different occupancy;
 - Cause 'Offensive Noise' as defined in the Protection of the Environment Operations Act 1997;
 - Impact upon the amenity of any adjoining property or tenancy by reason of the emission of noise, dust, fumes, odour, vibration, electrical interference or otherwise;
 - b) Loading and unloading in relation to the use of the approved development must occur within Lot 397 DP 755852.

Noise

24. The L_{A10} (Source) noise level emitted from the Telecommunications facility shall not exceed the background noise level in any octave band (measured using the L_{90} noise level descriptor) by more than 5 dB(A) when measured at the boundary of the nearest affected residence.

Electromagnetic energy levels

25. The telecommunications facility is to comply with the Australian Radiation Protection and Nuclear Safety Agency Protection Standard – Maximum exposure levels to radiofrequency fields – 3kHz to 300Hz as amended from time to time.

26. A validation report shall be submitted to Council within 12 months of the facility commencing operations. This report shall demonstrate that emissions levels for adjoining areas (i.e. at the distances as shown in the submitted EME Report, Dated 2/7/09, NSA Site No. 2541010) do not exceed the predicated EME levels and comply with the Australian Radiation Protection and Nuclear Safety Agency Protection Standard – Maximum exposure levels to radiofrequency fields – 3kHz to 300Hz as amended from time to time.

Asset protection zones

27. In perpetuity the entire property shall be managed as an inner protection area (IPA) as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bushfire Protection 2006' and the NSW Rural Fire Service's document 'Standards for asset protection zones'.

PART F

CONDITIONS THAT MUST BE COMPLIED WITH BEFORE AN OCCUPATION CERTIFICATE CAN BE ISSUED

28. Prior to the issue of an Occupation Certificate for the approved development the requirements of conditions 14 (Design and construction), 15 (Asset protection zones), 21 (Electromagnetic energy levels) and 22 (Exterior materials/colour schedule) shall be complied with and completed.

PART G

REASONS FOR CONDITIONS

Conditions of consent have been imposed to:

1. Ensure the proposed development:
 - a) achieves the objects of the Environmental Planning and Assessment Act, 1979;
 - b) complies with the provisions of all relevant environmental planning instruments;
 - c) is consistent with the aims and objectives of Council's Development Control Plans, Codes and Policies.
2. Ensure that the relevant public authorities and the water supply authority have been consulted and their requirements met or arrangements made for the provision of services to the satisfaction of those authorities.
3. Meet the increased demand for public amenities and services attributable to the development in accordance with Section 94 of the Environmental Planning and Assessment Act, 1979.
4. Ensure the protection of the amenity and character of land adjoining and in the locality of the proposed development.
5. Minimise any potential adverse environmental, social or economic impacts of the proposed development.
6. Ensure that all traffic, carparking and access requirements arising from the development are addressed.

7. Ensure the development does not conflict with the public interest.

PART H

ADVICE ABOUT RIGHTS OF REVIEW AND APPEAL

Development Determination under Environmental Planning and Assessment Act, 1979

*Under section 82A of the Environmental Planning and Assessment Act, 1979 an applicant may request the council to review its determination except where it relates to a complying development certificate, designated development or integrated development. The request must be made **within twelve (12) months** of the date of the receipt of the determination, with a prescribed fee of 50% of the original DA fee.*

*Section 97 of the Environmental Planning and Assessment Act, 1979 confers on an applicant who is dissatisfied with the determination of a consent authority a right of appeal to the Land and Environment Court which can be exercised **within twelve (12) months** after receipt of this notice.*

Approvals under Local Government Act, 1993

Section 100 of the Local Government Act, 1993 provides that an applicant may request Council to review its determination of an application.

*Section 176 of the Local Government Act, 1993 provides that an applicant who is dissatisfied with the determination of the Council may appeal to the Land and Environment Court. The appeal must be made within **twelve (12) months** of the date of determination.*

PART I

ADVICE ABOUT WHEN THIS CONSENT LAPSES

This consent is valid for five years from the date hereon.

In accordance with Section 95 of the Act, development consent of the erection of a building does not lapse if building, engineering or construction work relating to the building or work is physically commenced on the land to which the consent applies before the lapse date.

PART J

GENERAL ADVICE TO APPLICANT

Commonwealth Environment Protection and Biodiversity Conservation Act 1999

The Commonwealth Environment Protection and Biodiversity Conservation Act 1999 provides that a person must not take an action which has, will have, or is likely to have a significant impact on

- a) A matter of national environmental significance (NES) matter; or
- b) Commonwealth land

without an approval from the Commonwealth Environment Minister.

This application has been assessed in accordance with the New South Wales Environmental Planning & Assessment Act, 1979. The determination of this assessment has not involved any assessment of the application of the Commonwealth legislation.

It is the proponent's responsibility to consult Environment Australia to determine the need or otherwise for Commonwealth approval and you should not construe this grant of consent as notification to you that the Commonwealth Act does not have application.

The Commonwealth Act may have application and you should obtain advice about this matter.

There are severe penalties for non-compliance with the Commonwealth legislation.

Disclaimer – s88B restrictions on the use of land

The applicant should note that there could be covenants in favour of persons other than Council restricting what may be built or done upon the subject land. The applicant is advised to check the position before commencing any work.

Under clause 37 of Shoalhaven Local Environmental Plan 1985 agreements, covenants or instruments that restrict the carrying out of the proposed development do not apply to the extent necessary to enable the carrying out of that development, other than where the interests of a public authority is involved.

NSW Native Vegetation Act 2003

The Native Vegetation Act 2003 requires consent for the clearing of remnant native vegetation or protected regrowth from the Southern Rivers Catchment Management Authority. In the Shoalhaven City Council area, this requirement generally applies to land that is zone Rural (Zone 1), Special Use (Zone 5), Open Space (Zone 6), Environment Protection (Zone 7) and Natural Hazards (Zone 9). If your development consent relates to land in such a zone then you may need to get a further separate approval from the Southern Rivers Catchment Management Authority for the clearing of remnant native vegetation or "protected" regrowth.

This development application has been assessed in accordance with the New South Wales Environmental Planning & Assessment Act, 1979. The determination of this development application has **not** involved any assessment of the proposed development in regard to the NSW Native Vegetation Act 2003.

It is the proponent's responsibility to consult the Southern Rivers Catchment Management Authority to determine the need or otherwise for their approval and you should not construe the granting of this development consent as notification to you that the NSW Native Vegetation Act does not apply. The NSW Native Vegetation Act 2003 may have direct application to your proposal and you should obtain advice about this matter directly from the Southern Rivers Catchment Management Authority. You can contact them on 4429 4446 or by email southern@cma.nsw.gov.au.

There are severe penalties for non-compliance with the Native Vegetation Act 2003.

Rural Fire Service

The Rural Fire Service has advised that there is a potential for the combined effects of flame contact, radiant heat and convective heat exposures to overwhelm the building material and impact on the structure and contents.

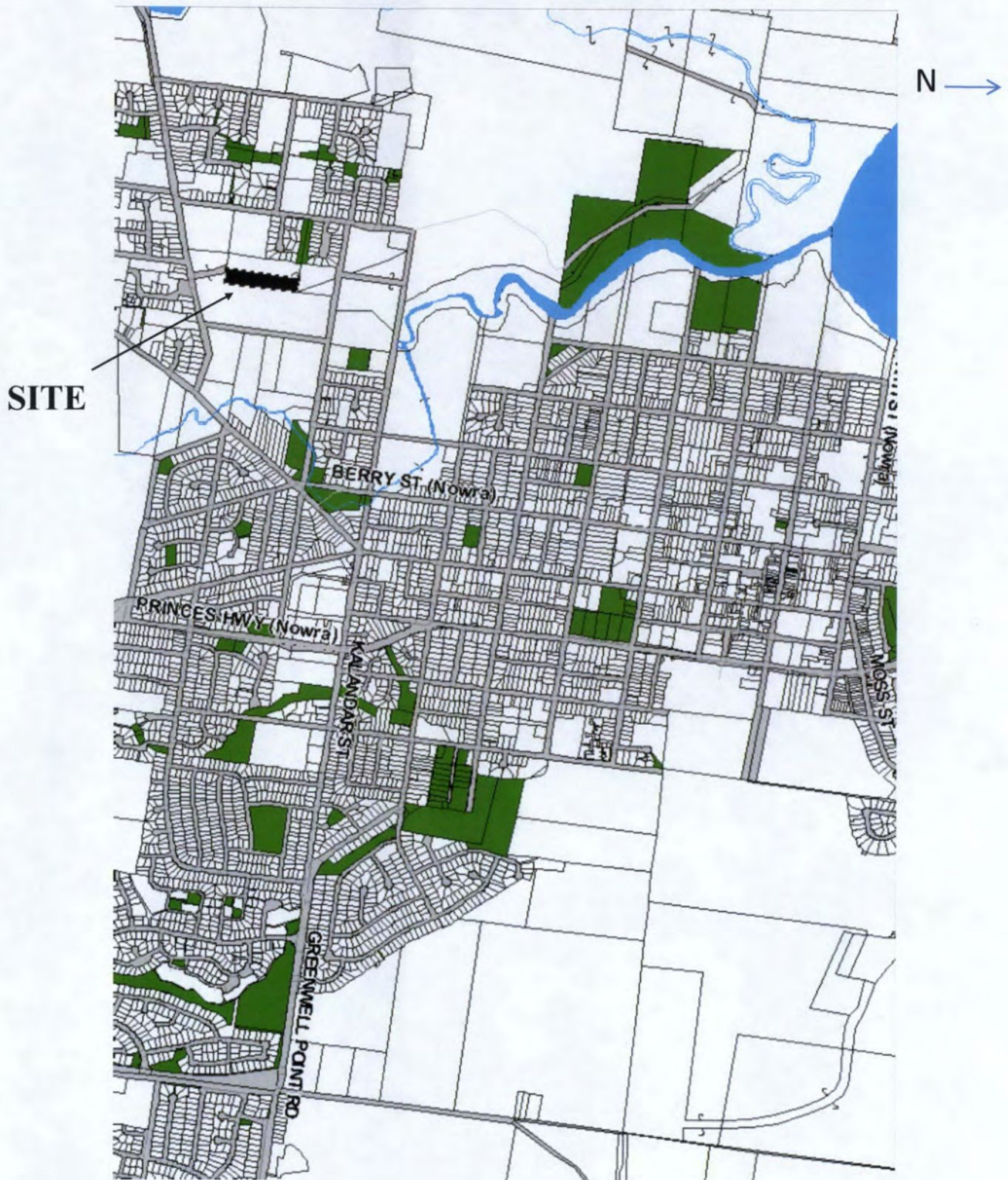
Adjoining Crown Land

The Department of Lands has advised that the proponent may not:

- a) Encroach upon the adjacent crown land/road;
- b) Remove any vegetation from the adjacent and adjoining Crown land/road;
- c) Stockpile materials, equipment or machinery on the adjacent or adjoining Crown land/road;
- d) Use the adjacent and adjoining crown land as access;
- e) Direct stormwater discharges or contaminated waste on the adjacent and adjoining Crown land; or
- f) Use the adjacent and adjoining Crown land as an asset protection zone.

Attachment 'A'

SITE LOCATION DETAILS



SITE LOCATION DETAILS



SITE LOCATION DETAILS



— Site Boundaries

■ Location of proposed telecommunications facility

Attachment 'B'

Attachment 'B'

SENSITIVE LAND USES MAP

SITE

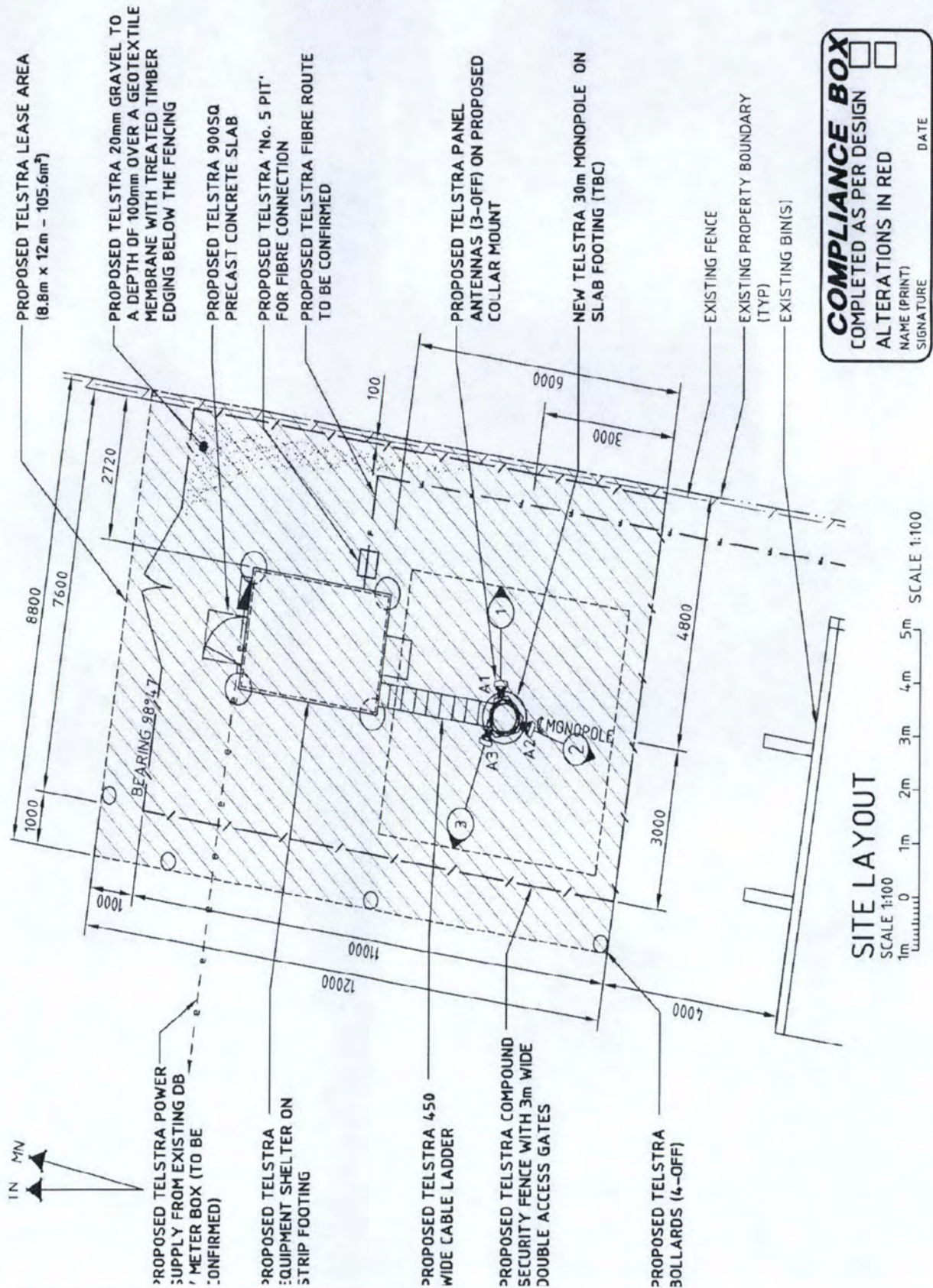


Closest Residential Property
– No.7 Maybush Way

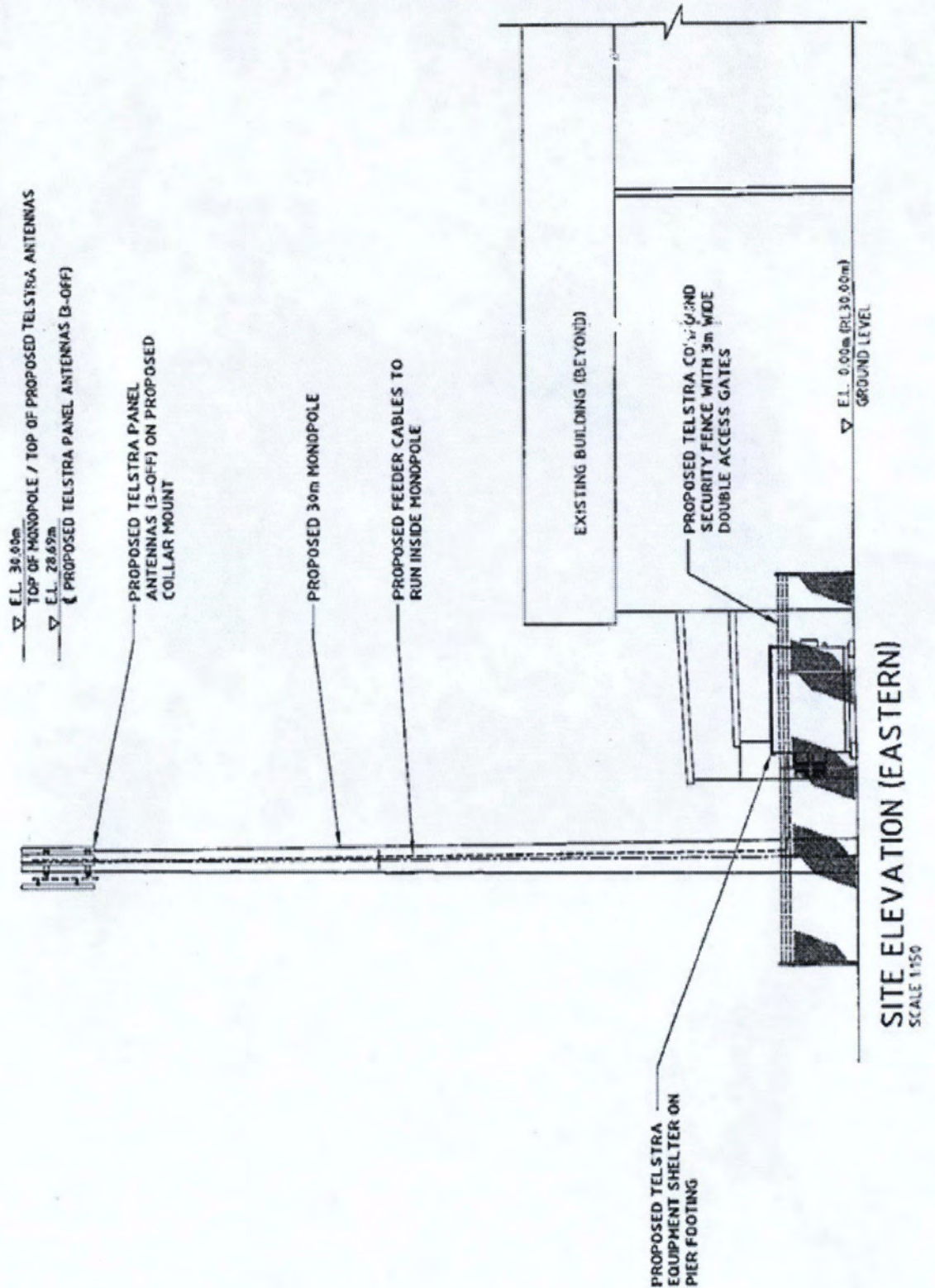
Closest Sensitive Land Use
– No.53 Yalwal Road

Attachment 'C'

DEVELOPMENT APPLICATION PLANS - SITE LAYOUT

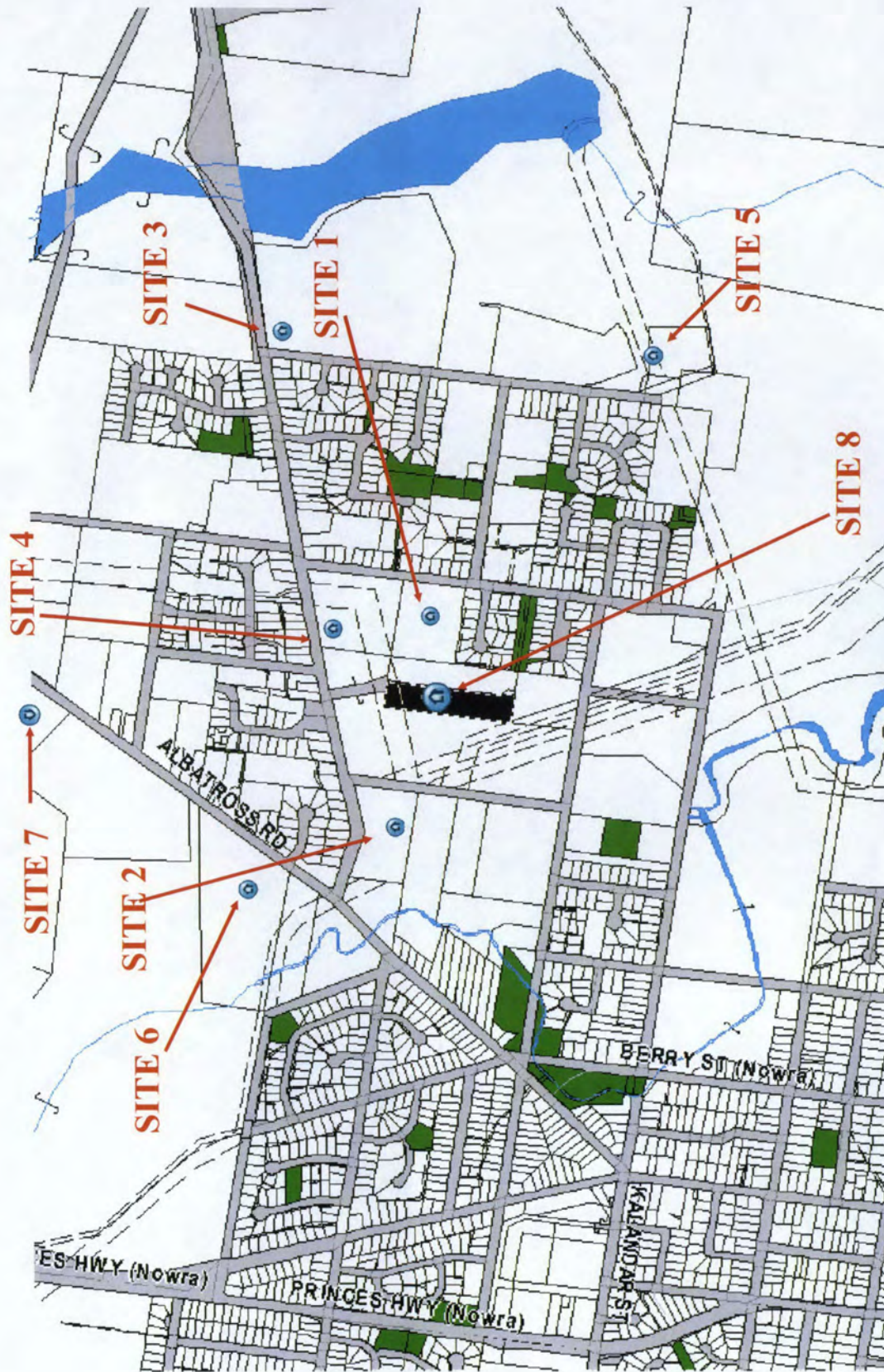


DEVELOPMENT APPLICATION PLANS - ELEVATION



Attachment 'D'

ALTERNATIVE SITE LOCATIONS



- | | |
|--|--|
| SITE 1-Integral Energy Depot | SITE 5-Flatrock Water Filtration Plant |
| SITE 2-Integral Energy Transformer Station | SITE 6-SCC Emergency Operations Centre |
| SITE 3-Triplarina Nature Reserve | SITE 7-Sholahaven Water Depot |
| SITE 4-Boral Nowra Concrete Plant | SITE 8-Metal Recycling Depot (Currently Proposed Site) |