Confidential Item

CAMPBELLTOWN CITY COUNCIL

Confidential Item

For Council meeting to be held on

Tuesday 15 August 2023 at 7.00 pm

Refer Item 11.5

Confidential Item

11.5 Depot Land (Part) Lease

Property and Governance Officer, Allison Down's Report

Purpose of Report

To advise Council of a request received from Prorealty Property Consultants, on behalf of Waveconn Pty Ltd, seeking to acquire a lease over a small piece of land within Council's Depot, off Newton Road, Campbelltown.

Strategic Plan Link

Focus Area 5.2.1 Strong and respectful relationships with other Councils, Government, businesses and organisations

Previous Council/Committee Resolution

Nil.

Background

Council has been approached by Prorealty Property Consultants on behalf of Waveconn, seeking to acquire new telecommunications sites across the country.

Waveconn are an infrastructure provider who acquire and build sites for telecommunications carriers in Australia. Waveconn expends upfront capital for the development of sites and offers sites to carriers for ongoing commitment.

A section of Council's Depot on Newton Road, Campbelltown has been identified as a site that meets the requirements that are suitable to Waveconn.

Prorealty has initiated contact with Council to confirm if there is an interest in considering a long term lease that would enable the development of telecommunications infrastructure (a telecommunications tower) within the Depot.

Legal Framework

The legal framework for the establishment of telecommunications infrastructure in Australia is provided by the Act (*Telecommunications Act 1997* (Cth)). This Act is comprehensive by nature, and the infrastructure provider and Council's rights and obligations are set by the status of the provider and the type of infrastructure being proposed.

Council's understanding is that Waveconn is both a ***carrier*** and an ***infrastructure developer*** in accordance with the Act, however on this occasion will be acting as a neutral host with the intention that carriers would use the facility once it is installed. This is important as Schedule 3 of the Act contains powers and immunities for a "**carrier**" that holds a licence pursuant to **Section 56** of the Act.

Working on the assumption that Waveconn will not exercise its right as a carrier in this instance, it would not exercise the following broad powers and immunities afforded under Schedule 3 of the Act to install certain facilities:

(a) the carrier is authorised to do so by a **facility installation permit** (this facilitates construction of facilities); or
(b) the facility is a **low-impact facility**; or
(c) the facility is a temporary facility for use by, or on behalf of, a defence organisation for defence purposes.

Only carriers are eligible to obtain a FIP (Facility Installation Permit) and there is no evidence that the proposed installation is intended to be temporary and for defence purposes.

Therefore the status of the infrastructure is of principle relevance in relation to this request. If the facility was intended to be a LIF (low impact facility) such as a pay phone booth, equipment shelter below certain heights and area coverages, or *temporary* tower below 30m in height, Council's rights to negotiate the proposal would be very limited.

However Council's legal advice confirms that the facility is not intended to be a LIF under Clause 6(5) of Schedule 3 of the Act, and as such this provides Council with more scope to negotiate aspects of the facility prior to the issue of a FIP pursuant to Division 6 of Schedule 3 of the Act.

ACMA (Australian Communications and Media Authority) are the decision making entity that issue FIPs. They are required to consider particular criteria (specifically Clause 27 of Division 6 of Schedule 3) when making an assessment of a FIP request, including evidence that the carrier has made reasonable efforts to negotiate in good faith with the Council (in this case both as the landholder and in its capacity as an 'administrative authority').

On the basis that Waveconn is not operating as a carrier for this site and therefore would not apply for a FIP, then Council has full discretion to negotiate or refuse the proposal.

However, Council should be mindful that ACMA's discretion and an Administrative Appeals Tribunal right of review opportunities open to Waveconn under Clause 35 of the Act could be implemented if the process does not proceed, or alternatively Waveconn could change its approach and choose to exercise its 'carrier' rights if Council refuses the approach for infrastructure to be installed. Further, Commonwealth law takes precedence over any State law that Council may rely on to control negotiations with Waveconn in this matter.

In summary, Council is able to refute the request at this point. It should be noted that if this is the decision, Waveconn may at a future time resubmit this proposal as a carrier and exercise its rights as described above.

Discussion

To assist Council in its consideration of the request to consider leasing a small piece of land within the Depot, Prorealty has supplied Staff with some initial information to support their proposal.

The parcel that has been identified as being suitable is situated on Allotment 106, DP 3706, Vol 5337, Folio 514. This parcel is within the land used for Depot operations, however it is within the title for the property known as 135 Montacute Road, Campbelltown.

Members should note that the land in question is not classified as Community Land and therefore it is within Council's authority to enter into long term lease agreements without public consultation. However, the proposed development would be a *Performance Assessed* development given its location within an Employment Zone. In this regard, Council's Development Assessment Staff have advised that whilst a telecommunications facility is a contemplated land use within this zone, a Development Application would be required. An application of this nature would trigger public consultation on the basis that it impacts on the visual amenity of a residential area and is located approximately 15m from the residential zone interface.

Staff have further identified that in the event of an application being received, this may need to be assessed by an independent Planning Consultant in order to manage any perceived conflict of interest associated with Council assessing an application concerning this project.

The location of the proposed facility is shown below, outlined in red:



Whilst the proposed telecommunications tower is subject to securing a long term lease over the parcel of land, Waveconn have indicated that the parcel of land required is 60sqm, measuring 5m x 15m. The proposed intentions for the space would be to locate a monopole with triangular headframe with an estimated height of 28.6m (plans attached containing more information).

For Members' information, a tower of this height (28.6m) would be:

- Approximately 10m taller than the existing gum tree that is situated close to the proposed location of the tower
- Similar in height to a 10 storey building
- 10m taller than the Migrant Monument
- The same height as the telecommunications tower at the rear of Campbelltown Shopping Centre (Denmead Avenue).

Prorealty have indicated that if the depot site is not deemed appropriate by Council however a nearby alternative suggested site is recommended, that they would be open to considering an alternate location within this area.

For further information, the following table outlines both the existing and proposed telecommunications towers within the Council area. Telecommunications towers that are 'proposed' have been approved but have not been constructed. Further information, including telecommunications towers in neighbouring areas which also provide network coverage to the Campbelltown area can be obtained by visiting the Radio Frequency National Site Archive. [1]

Location	**Carriers**	**Existing / Proposed**
157 St Bernards Road, Rostrevor	Optus, Telstra, Vodafone 3G to 5G	Existing
17 Meredith Street Newton	Optus, Vodafone 3G to 5G	Existing
42 Jenkins Avenue, Newton	Telstra 4G	Existing (Small Cell)
27 Virginia Road, Newton	Optus, Telstra, Vodafone 3G to 5G	Existing
8 Antonio Court, Newton		Proposed
610 Lower North East Road, Campbelltown	Optus, Telstra, Vodafone 3G to 5G	Existing
27 Cranbrook Avenue, Magill		Proposed
8B Central Avenue, Magill	Telstra 4G	Existing (Small Cell)
22 Athol Avenue, Tranmere	Telstra 4G	Proposed
Lorne Avenue, Magill (UniSA)	Optus, Telstra, Vodafone 3G to 5G	Existing
30 Woodforde Road, Magill		Proposed
Lot 602 Vine Street, Magill	Optus, Telstra, Vodafone 3G to 5G	Existing
Location	**Carriers**	**Existing / Proposed**
Paradise Interchange, Darley Road, Paradise	Optus, Telstra, Vodafone 3G to 5G	Existing
Lot 8 Macfarlane Place, Campbelltown	Optus, Telstra, Vodafone 3G to 5G	Existing
557 Magill Road, Magill	Telstra 3G to 5G	Existing
310 Gorge Road, Athelstone	Telstra 3G to 5G	Existing
Athelstone Shopping Centre, 320 Gorge Road, Athelstone	Optus, Vodafone 3G to 4G	Existing
297 Montacute Road, Newton	Optus, Telstra, Vodafone 3G to 5G	Existing

The existing mature gum tree that sits adjacent to the site is approximately 19m high and whilst it is not considered to be at risk of interference with the proposal, some minor pruning may be required.

[1] (Archive, Radio Frequency National Site, 2023)

The proposed access to the site would be via Montacute Road (through the car park) and would potentially result in minor disruption to Depot operations throughout construction. Construction to carrier commitment is expected to take between six months to two years, and the standard term of lease tenure is 30 years.

Consultation with Council's Depot management, has indicated that structure could be accommodated without significant impact upon Council's operations.

Initial advice from Prorealty has indicated that Waveconn have offered a rental fee of $18,000 plus GST with an annual increase of 2.5%.

Council recently (7 March 2023) approved a similar agreement for a telecommunications structure at Lot 27 Virginia Road, Newton (lease renewal to Amplitel). The rental fee for 2022/2023 was $29,319 (excluding GST) and is subject to annual increases of 5%.

Staff have obtained a preliminary market rental assessment for the proposed lease which has assess the initial offering from Waveconn against a number of other telecommunications leases in Adelaide and regional locations. The valuers for this project have estimated that the market range rent for this proposal is between $18,000 and $24,000 per annum. Their advice is that Council might consider a mid point of $21,000 as its as a reasonable annual lease fee.

In terms of the annual increases to the lease, the valuers have suggested that the proposed increases of 2.5% is slightly lower than the market parameters and have recommended either fixing increases to be aligned with CPI or a rate between 3% and 5% would be more consistent with current market conditions.

Potential Options

Staff believe the following options would be reasonable for Council to consider at this time:

1. Advise Prorealty that Council is not willing to lease a portion of its land at the Campbelltown Depot at this time for telecommunication infrastructure.

OR

2. That subject to favourable broad community consultation outcomes being received, that Council authorise the Chief Executive Officer to enter into negotiations with Waveconn, via Prorealty regarding consideration of a potential lease for use of a portion of the Council Depot for establishment of telecommunications infrastructure (a telecommunications tower) with the following initial principles:

    - The lease would be for up to 30 years, with income of a minimum of $24,000 per annum, subject to 5% increases annually.
    - That Waveconn prepare site elevation plans to demonstrate to Council the potential impact of the tower on surrounding infrastructure.
    - That any consultation required be undertaken at Waveconn's cost.

- Any lease agreement would be subject to Waveconn acquiring development approval and undertaking site works and lease preparations at their cost.
- That Waveconn do not impede Council's access to any part of its depot site not leased to Waveconn.

and that any counter offer or form of negotiation from Waveconn, shall be referred back to Council for further consideration.

However, if Council proceed with Option 2 and the broad Community consultation outcomes are unfavourable regarding a potential lease for use of a portion of the Council Depot for establishment of telecommunications infrastructure (a telecommunications tower), that Staff prepare a further report for consideration by Council.

Social Implications

Whilst Staff are concerned with the potential leasing considerations, if the proposed development of a telecommunications structure proceeds this would support improved connectivity and access within the Campbelltown area.

Environmental / Climate Change Implications

The proposed structure would be located within the Council's Depot and therefore have minimal impact environmentally. It would be built in accordance with relevant standards required for telecommunications facilities (refer to the Environmental EME report guide and confirmation email in the attachments).

Asset Management Implications

The proposed structure within the leased space would remain the property of the lessee, and would not be the responsibility of Council. The compound the telecommunications infrastructure is located in would be off limits except to agents of the lessee.
As part of its negotiations for this process, Council could request that Waveconn provides additional site elevation plans to show how the proposed tower impacts on surrounding infrastructure.

Governance / Risk Management

Waveconn would manage the security of infrastructure at the site and liaise with Council Staff in relation to access and further security requirements.

The lease will be drafted by Waveconn (at their expense) in consultation with Council Staff enabling opportunity to consider any further administrative requirements including risk factors.

Community Engagement

The potential structure would be situated adjacent to residential properties on Morris Street and be located within the workspace of Depot workers. Therefore, in addition to legislative development application public consultation requirements, Staff recommend that broad community consultation (including targeted consultation with impacted residents and Staff at the Campbelltown Depot) be conducted prior to any negotiations with Prorealty commencing.

Regional Implications

There are no regional implications in relation to this report.

Economic Development Implications

The presence of an additional telecommunications facility can have positive economic impacts to the local Community.

Financial Implications

Alienation of this section of the Depot is not anticipated to have any material financial impacts on Council's operations. Revenue received from the lease would result in improving Council's operating result.

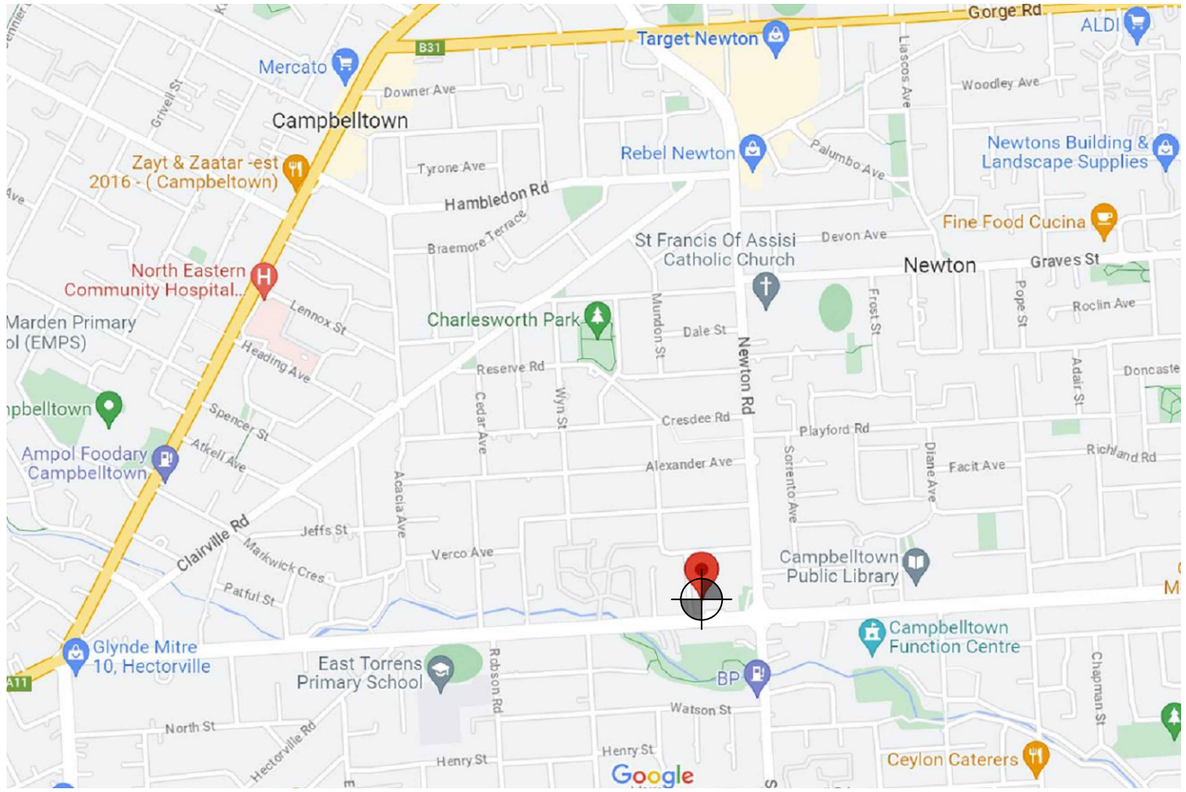
Recommendation

For Council's consideration.

DATE OF ISSUE		24.04.2023									
DRAWING PACKAGE VERSION		1									

GENERAL DRAWINGS

AS5074-003-P1	DRAFT SITE PLAN	A-1									
AS5074-003-P2	DRAFT SITE SETOUT PLAN	A-1									
AS5074-003-P3	DRAFT SITE ELEVATION	A-1									



LOCALITY PLAN

NOT TO SCALE

CAMPBELLTOWN (SA)

135 MONTACUTE ROAD,
CAMPBELLTOWN,
SA 5074

SITE ID: AS5074-003

waveconn

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

FOR APPROVAL

DRAWING No.
AS5074-003 - 00

MGA

EXISTING PARKING AREA

EXISTING BUILDINGS

PROPOSED INSTALLATION AND LEASE AREA (HATCHED)

PROPOSED POWER ROUTE FROM EXISTING METERING LOCATION

EXISTING 19m TALL GUM TREE

EXISTING METER PANELS

PROPERTY BOUNDARY

PROPOSED SITE ACCESS



SITE PLAN

SCALE 1:500

REVISION	DATE	REVISION DESCRIPTION	DRAWN	DESIGNED	APPROVED
A-1	24.04.2023	ISSUED FOR APPROVAL	EW	EW	MH

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AS5074-003
CAMPBELLTOWN (SA)

135 MONTACUTE ROAD, CAMPBELLTOWN, SA 5074

TITLE : DRAFT SITE PLAN

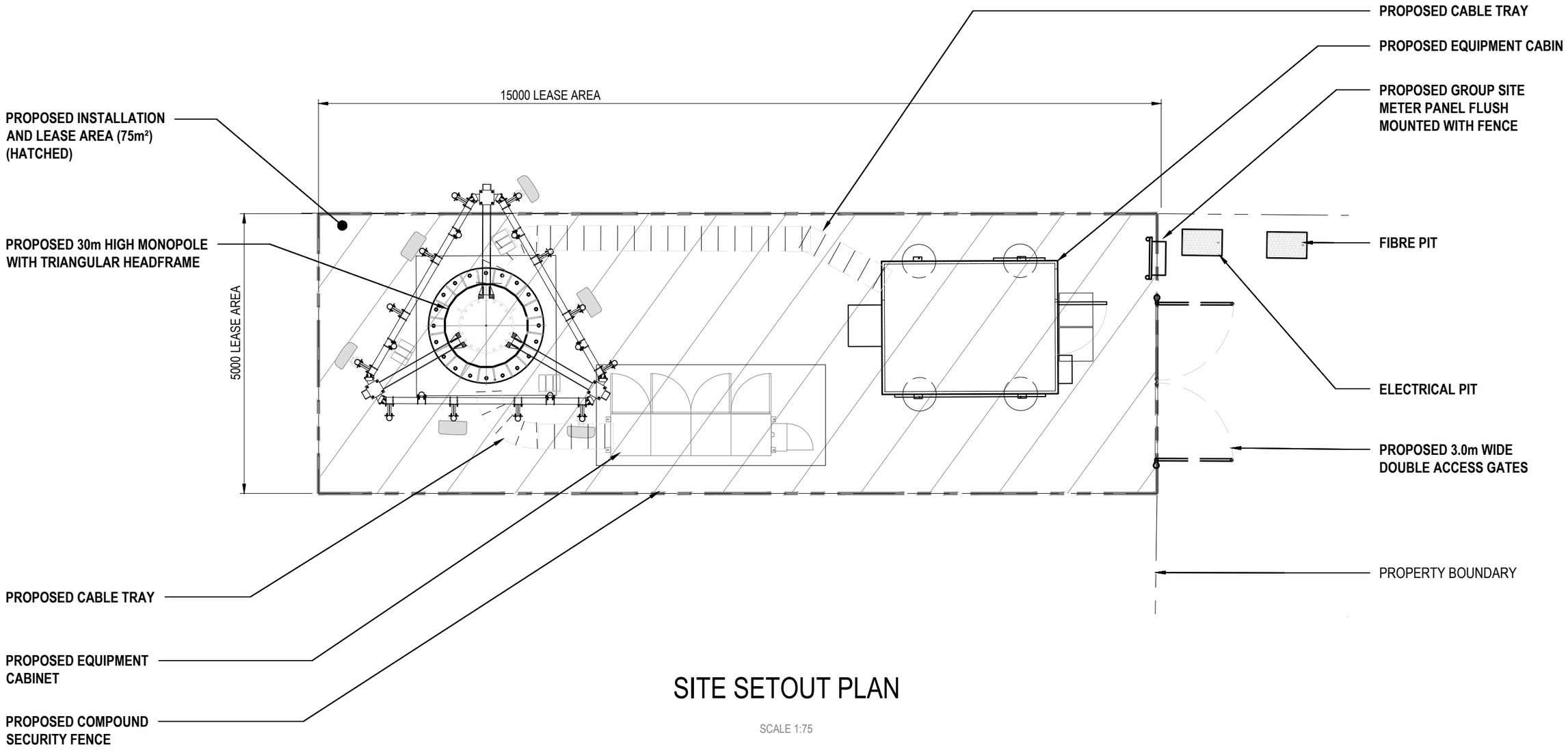
DRAWING STATUS :	DRAWING No.	REVISION
FOR APPROVAL	AS5074-003 - P1	A-1

SCALE 1 : 500 AT A3

5m 0 5m 10m 15m 20m 25m

A3

DATUM POINT	GDA94 COORDINATES	
	LATITUDE	-34.888207
	LONGITUDE	138.672748



SITE SETOUT PLAN

SCALE 1:75

REVISION	DATE	REVISION DESCRIPTION	DRAWN	DESIGNED	APPROVED
A-1	24.04.2023	ISSUED FOR APPROVAL	EW	EW	MH

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AS5074-003
CAMPBELLTOWN (SA)

135 MONTACUTE ROAD, CAMPBELLTOWN, SA 5074

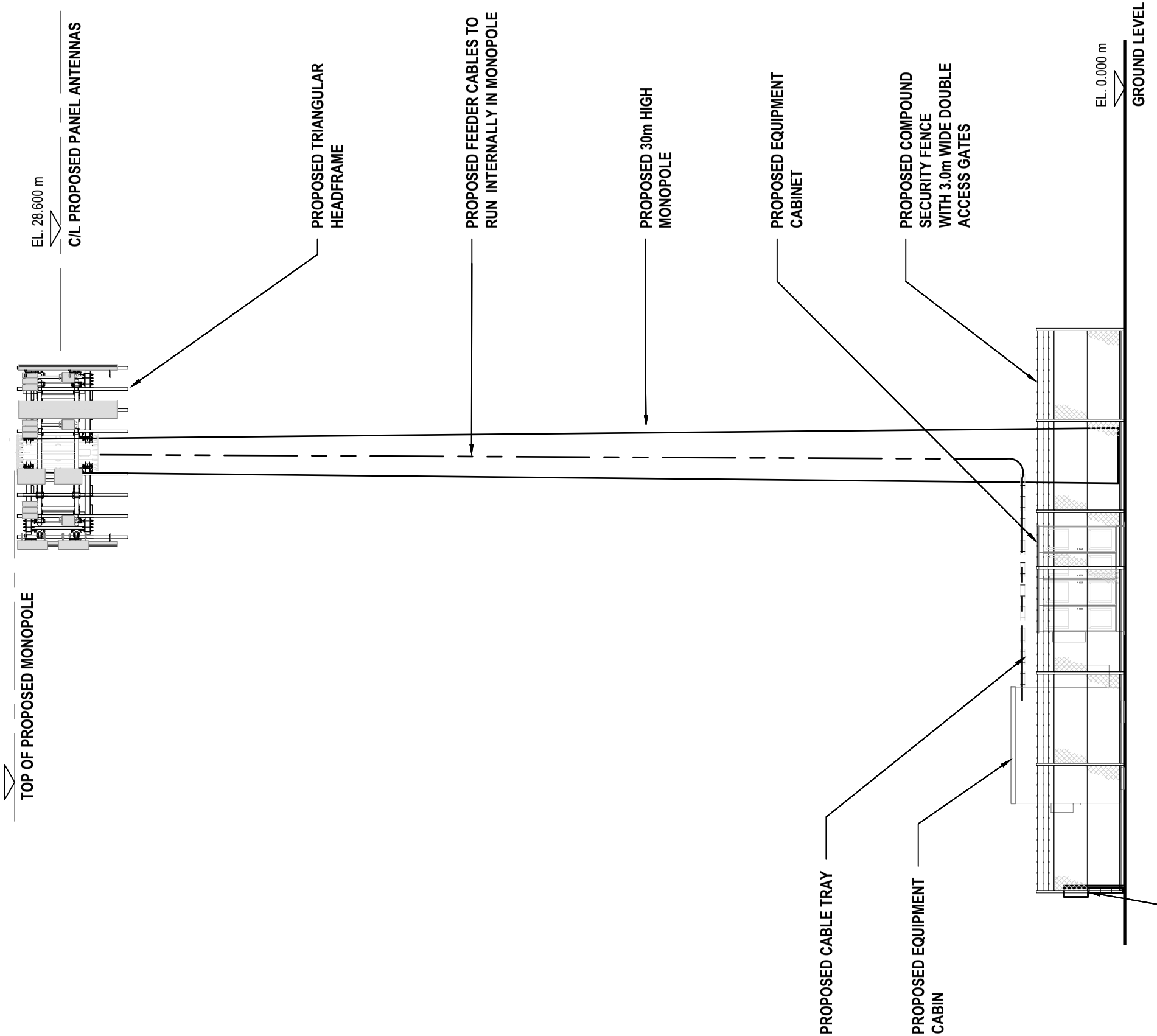
TITLE : DRAFT SITE SETOUT PLAN

DRAWING STATUS :	DRAWING No.	REVISION
FOR APPROVAL	AS5074-003- P2	A-1

SCALE 1 : 75 AT A3

750 0 750 1500 2250 3000 3750

A3



NORTHERN ELEVATION

SCALE 1:125

REVISION	DATE	REVISION DESCRIPTION	DRAWN	DESIGNED	APPROVED
A-1	24.04.2023	ISSUED FOR APPROVAL	EW	EW	MH

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AS5074-003
CAMPBELLTOWN (SA)

135 MONTACUTE ROAD, CAMPBELLTOWN, SA 5074

TITLE : DRAFT SITE ELEVATION

DRAWING STATUS :	DRAWING No.	REVISION
FOR APPROVAL	AS5074-003- P3	A-1

SCALE 1 : 125 AT A3

1250 0 1250 2500 3250 4500 5750

A3

Allison Down

From: James Humphreys <james@prorealty.com.au>
Sent: Monday, 10 July 2023 8:56 AM
To: Allison Down
Subject: RE: 6 Newton Rd
Attachments: A Guide to the EME Report.pdf; EME Report - Macfarlane Place, Campbelltown.pdf; Site Compliance Certificate.pdf

Hi Allison,

Hope you had a good weekend. As requested, please see below and attached information for review.

The proposed installation will emit Electromagnetic Energy (EME) from the antennas but there is no noise omitted from the antennas.

There are no proven negative health impacts associated with these types of installations despite the extensive amount of research an literature which is available around mobile infrastructure.

Firstly, please see some information at the following links.

- https://www.arpansa.gov.au/understanding-radiation/radiation-sources/more-radiation-sources/mobile-phone-base-stations
- http://www.emfexplained.info/?Page=25196
- https://www.optus.com.au/for-you/5g/eme
- https://www.arpansa.gov.au/understanding-radiation/what-is-radiation/non-ionising-radiation/radiofrequency-radiation

EME Reports:
As outlined in the attached *A Guide to the Environmental EME Report*, every telecommunications facility in Australia is required to have an Environmental EME Report publicly available. This report outlines the maximum levels of radiofrequency around an existing or proposed base station. The EME Report will provide a percentage of emissions in relation to the allowable limits under the Radiation Protection Standard ("Standard") established by Australian Radiation Protection and Nuclear Safety Agency ("ARPANSA"). The Australian Standard for EME is a conservative value in comparison to global standards.

We do not have a current EME Report for this site currently (one can be provided if required), however, I attach a copy of a report from an existing site in Campbelltown to provide as an example. As you will see, this shows a maximum level of emission at 3.80% (increasing to 4.53%) of the allowable public exposure limit at 146m away from the tower, I also note that this particular site has all three Carriers so levels will be higher than a site with only one or two Carriers. This EME levels equates to approx. 1/20th of what is allowed under the Australia Standard. This is clearly very low and would not be course for concern.

Every time there is a change made to the equipment installed at the site, this EME Report must be updated (as shown in the attached EME report) with the new radiofrequency levels. The EME Report will be kept on the RFNSA (Radio Frequency National Site Archive) to which Council will have access to. Once the changes have been completed, a Certificate of Compliance is required to be obtained via the AMTA (copy attached). It is a requirement

by law for Carriers to maintain these documents are all site across the Country to ensure the sites are compliant with the required regulations.

Please let me know if any additional information is required.

JAMES HUMPHREYS

prorealty
PROPERTY CONSULTANTS

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prorealty.com.au **|** Linkedin **| If you like our service, please leave us a Google Review**

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Please consider the environment before you print this email.

Australian Government
Australian Radiation Protection and Nuclear Safety Agency

arpansa

A Guide to the Environmental EME Report

What is an Environmental EME Report?

The Environmental EME Report provides calculations of the maximum levels of radiofrequency (RF) electromagnetic energy (EME) around an existing and/or proposed wireless base station that may include mobile telephony, broadband and data services. The report is generally produced by a network operator (such as a mobile phone company) or consultants working on their behalf.

All deployment of public mobile telecommunications service infrastructure in Australia, which includes wireless base stations, small cells and antennas, must be carried out according to an industry Code of Practice[1]. The Code requires the supply of certain information as part of the consultative process with the local community and local government authority. The environmental EME report is part of this process and is produced according to a methodology developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)[2]. It provides objective estimates of the maximum levels of EME from a wireless base station or small cell for both existing and proposed upgrades to telecommunications systems at the site. There are two types of an environmental EME report, each representing either a wireless base station or small cell.

Why is there an EME Report?

Wireless base stations and small cells work by sending out RF EME in the form of waves carrying information. When the RF EME reaches objects, including people and animals, some of the energy carried by the waves is deposited in the object[3]. This can lead to heating of the object and, if levels are too high, can cause harmful effects. The ARPANSA RF Standard[4] provides limits of exposure which must be complied with by all radio installations, including wireless base stations and small cells. The limits for EME exposure given in the ARPANSA Standard are intended to provide protection for people of all ages and medical conditions when exposed 24 hours per day, 7 days per week. The EME Report shows the maximum calculated levels for a specific installation and compares them against the exposure limits in the ARPANSA Standard.

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[1] The Communications Alliance Ltd Industry Code C564:2011 'Mobile Phone Base Station Deployment' is available from the Communications Alliance Ltd website, http://commsalliance.com.au.

[2] The ARPANSA methodology produces overconservative calculations for multiple-input and multiple-output (MIMO) systems

[3] Information on RF EME and its effects is available from ARPANSA http://www.arpansa.gov.au/RadiationProtection/basics/rf.cfm

[4] The ARPANSA RF Standard is available from http://www.arpansa.gov.au/Publications/Codes/rps3.cfm

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What information is on the report?

The report gives the address of the installation, together with a list of the companies using the site and the types of mobile network currently installed and being proposed. It also includes details of calculated levels of RF EME. If the site already has antennas in place, the report includes separate information on the existing and the combined existing and proposed installations. The report estimates RF EME from all of the identified wireless transmitters at this site; it does not estimate RF EME from all surrounding sites. The calculated levels do not include RF EME from other types of radio transmitters (that are not subject to the industry Code) which may be installed on the same structure, e.g. AM and FM radio, TV etc.

EME Levels

The tables of calculated EME levels on the report provide maximum levels of EME found at various distances from the base of the tower or supporting structure for wireless base stations. Within each range of distances, the highest value is given regardless of direction. For small cells mounted on light and power poles or other structures, the report shows the maximum EME level and the distance where this occurs. This provides more relevant exposure information to account for the lower overall power and the much shorter range of the transmitted radio signals from small cells.

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 (mW/m²) – the power density (or rate of flow of RF energy per unit area)[5]
- percentage (%) of the ARPANSA Standard

When expressed as a percentage, a value of 100% corresponds to the general public exposure limit. For example, a 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 table below shows the actual EME limits in the ARPANSA RF Standard used for the frequency bands representing different types of mobile network. At frequencies below 2000 megahertz (MHz) the limits vary across the band and the limit values shown in the table have been determined at the Assessment Frequency indicated. The table shows the three equivalent exposure limit figures in V/m, mW/m² and % ARPANSA Standard.

Radio Systems	Frequency Band	Assessment Frequency	ARPANSA Standard public exposure limits at the Assessment Frequency		
			Electric Field V/m	Power Density mW/m²	% of ARPANSA exposure limits
LTE700	758 – 803 MHz	750 MHz	37.5 V/m	3750 mW/m²	100%

[5] Power density is often expressed in units other than mW/m², other common units are watts per square metre (W/m²) and microwatts per square centimetre (μW/cm²). Where conversion is required: 1 watt per square metre (W/m²) = 100 microwatts per square centimetre (μW/cm²) = 1000 milliwatts per square metre (mW/m²).

WCDMA850	870 – 890 MHz	900 MHz	41.1 V/m	4500 mW/m²	100%
GSM900, LTE900, WCDMA900	935 – 960 MHz	900 MHz	41.1 V/m	4500 mW/m²	100%
GSM1800, LTE1800	1805 – 1880 MHz	1800 MHz	58.1 V/m	9000 mW/m²	100%
LTE2100, WCDMA2100	2110 – 2170 MHz	2100 MHz	61.4 V/m	10000 mW/m²	100%
LTE2300	2302 – 2400 MHz	2300 MHz	61.4 V/m	10000 mW/m²	100%
LTE2600	2620 – 2690 MHz	2600 MHz	61.4 V/m	10000 mW/m²	100%
LTE3500	3425 – 3575 MHz	3500 MHz	61.4 V/m	10000 mW/m²	100%

Effect of Landscape (topography)

The tables of calculated EME levels provide values at 1.5 m above a flat landscape. Commonly, wireless base stations and small cells are located on a high point and the assumption of flat ground provides a worst-case estimate for these situations. Sometimes, however, the ground may slope upwards away from the installation and this can cause concern that levels may be higher than calculated. In these cases the 'Calculated EME levels at other areas of interest' table should include the levels of EME at a selection of heights where maximum levels are expected.

Generally, locations very close to the base of the antenna will experience very low levels of EME compared to the surrounding areas. This may not be true if a location is both close, say within 100 m, and elevated above the height of the base of the antenna structure. This may occur because a building is located nearby or the ground rises sharply. In either of these circumstances, EME levels may actually be higher than found at the height of flat ground or a community member may have reasonable concerns that this is so. If such locations exist, carefully calculated estimates in a representative sample of such situations should be provided in the 'Calculated EME levels at other areas of interest' table. It is important to note that in many cases the location may not be in the direction of significant radiated EME and the EME levels may be very low.

Other Areas of Interest

The industry Code requires the mobile network companies to take account of community concern about locations of particular interest, such as places where children spend a lot of time, or multistorey residential buildings facing the antennas. The table 'Calculated EME levels at other areas of interest' on the report provides additional estimates of EME levels at a small number of such locations. These locations may be identified as being of particular concern to the community during the consultation process required by the Code. Typically, levels may be given for the closest point of a children's facility, or for a small number of other locations. It is expected that for an average report, there may be 3 to 5 additional areas of interest calculations. These should be chosen to be representative of both community concern and locations where higher levels of EME may actually be expected on technical grounds. Major community sensitive locations would be expected to be included and a small number of floors of a multistorey building close to the antennas. For some sites there may be no indication for other areas of interest, such as where there is flat

ground, no elevated buildings and no locations identified as being of particular community concern. In these cases, after checking:

- the Communications Alliance Ltd Code community consultation plan
- topography or buildings near the antennas
- other locations, such as those identified as being of significant previous community concern

no other areas of interest will have been identified. In this case, the EME Report should include the statement 'No locations identified' in the 'Calculated EME levels at other areas of interest' table.

Can I expect to have an EME calculation done for my house?

Whilst the Environmental EME report is a basic report, members of the public are free to request (in writing) a Carrier to provide additional information under the Communications Alliance Ltd Industry Code, Section 10.3 Additional Information Supplied by Carrier. The Carrier will choose how best to service that request, but it will not be considered as part of the ARPANSA EME report (which is covered under Section 6.2 RF EME Health and Safety Information of the Code).

Why do the EME levels vary with distance?

The calculations of the maximum EME levels are based on well understood principles of physics that deal with how electromagnetic waves travel and spread out. The total amount of energy emitted from the antenna is limited by the power of the amplifier used to drive the antenna. As the energy leaves the antenna, it spreads out to cover bigger and bigger areas and so gets less intense the further away it gets, this is illustrated in Figure 1 which shows a basic 2-dimensional view of what happens to the EME around a real base station.

The antenna is usually designed to direct most of the energy out towards the horizon, or a few degrees below, so that most of the energy goes where it is needed to communicate with the mobile phone handsets or other user equipment. As one moves away from a base station at ground level, the levels first increase before reaching a maximum and then get less as you move still further away. Typically, the maximum EME level at ground level will occur between 75 m and 200 m from the base of the antenna.

The mobile network companies sometimes need to adjust the angle of the antennas to obtain the best coverage and this can alter slightly the distance at which the maximum occurs and exactly what EME level is found there. Often, the ARPANSA EME Report will take likely alterations into account and include the highest levels that might occur if the antenna is moved in the future. Some antennas use self-tilt and pan to dynamically change direction; in these situations the orientation that produces the highest maximum EME level is used for the calculation.

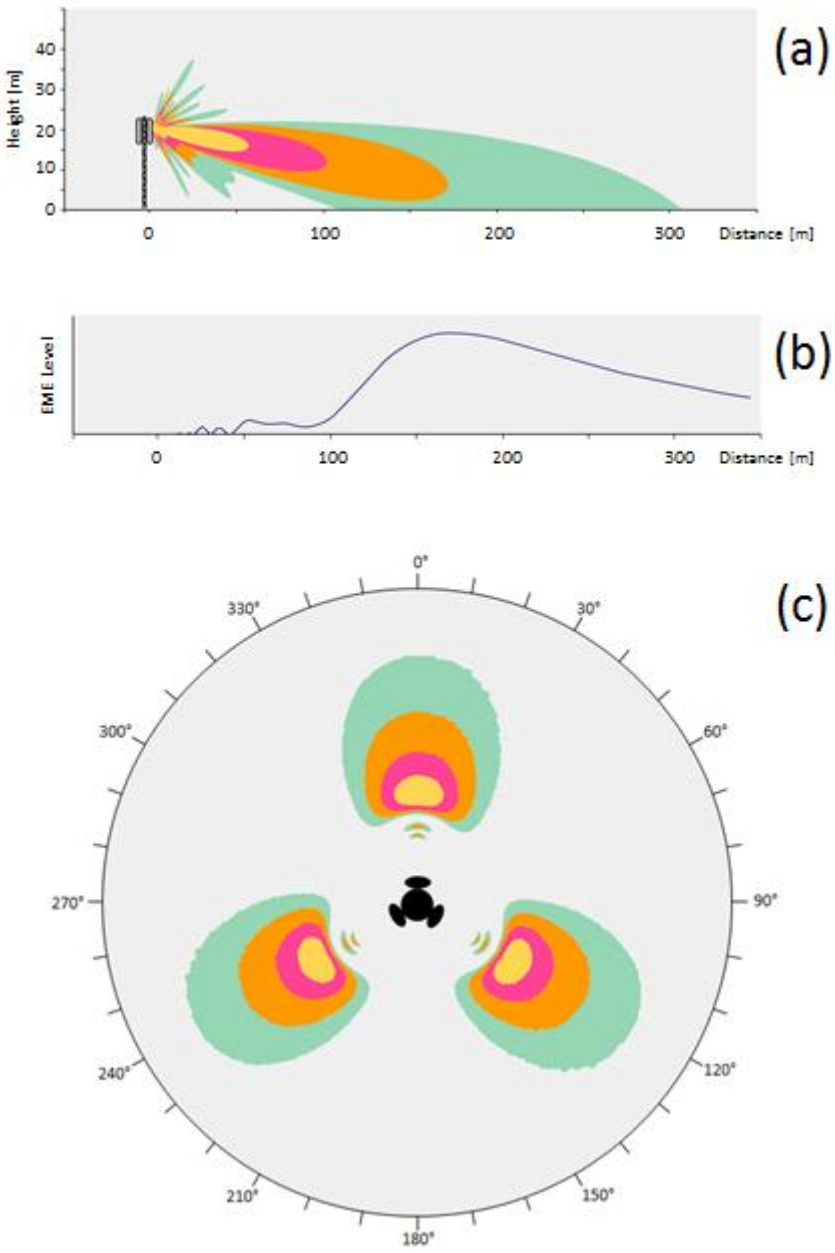


Figure 1. How the EME levels vary as you move away from a base station tower.
(a) Side view of a single antenna pattern. (b) EME level at 1.5 m above ground.
(c) Aerial view of three sector antenna pattern

The EME transmitted from small cells is more localised and, depending on its configuration, may not follow the same emission profile as a larger base station. Typically, the EME levels are very low and they decrease rapidly with distance away from the source much like the larger base stations.

How Accurate are the Calculated Values?

The values of EME provided in the report are intended to be maximum levels that can almost never be exceeded when the base station is operating. The values assume, for example, that all the planned transmitters are installed and are all operating at maximum power. Some of the transmitters at a base station are only used when there are a certain number of telephone calls or data transmissions actually in progress; otherwise they are turned off. Even when a call is in progress, the power transmitted is adjusted to be only as high as necessary to communicate with the handset. If the handset is close, or in a good signal area, the base station transmitter will reduce its power automatically.

The calculations do not take into account trees, vegetation or buildings which may alter the EME levels, generally decreasing them. Some of the EME is reflected from buildings and the ground and often this signal is used by a handset when the direct signal is blocked by a building. When the reflected signal and direct signal combine the overall level can be lower or higher than the direct signal alone depending on the exact location.

Measurements around base stations have shown actual values of EME are usually less than calculation by factors of 10 to 1000 or even more. Values of EME indoors will typically be even lower as walls, windows and roofs absorb or reflect the energy.

A similar situation applies to the emissions from small cells. The EME emissions from small cells follow the same physical process and are similarly affected by surrounding objects.

Example Snapshot of Calculated EME Levels

The maximum EME level calculated for the **existing** systems at this site is

0.46%

out of 100% of the public exposure limit, 161.98 m from the location.

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

1.0%

out of 100% of the public exposure limit, 161.10 m from the location.



EME levels with the proposed changes

Distance from the site	Percentage of the public exposure limit
0–50 m	0.09%
50–100 m	0.16%
100–200 m	1.0%
200–300 m	0.88%
300–400 m	0.43%
400–500 m	0.24%

The example snapshot above applies to the calculated EME levels around a typical base station and provides the following information:

- The highest calculated level of RF EME coming from the existing equipment at this base station is found at a distance of approximately 161.98 m and is 0.46% or less than 1/200 of the ARPANSA Standard exposure limit.
- Subsequent to the proposed alterations to the equipment at this site, the highest calculated level of RF EME rises to 1.04%, which is found at a distance of 161.10 m from the base of the tower.

The information detailing EME levels at radial distances from the installation is not included in EME reports for small cells due to the more localised emission of the antennas. In this case, information about the highest calculated EME level at the corresponding distance associated with the small cell is included. This is reported for both existing and proposed systems at the site in the same way as wireless base stations.

Example Table of an In-depth Look at Calculated EME Levels

	Existing configuration			Proposed configuration		
Distance from the site	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
0–50 m	0.57	0.87	0.01%	1.7	7.2	0.09%
50–100 m	0.96	2.5	0.04%	1.9	9.2	0.16%
100–200 m	3.4	31	0.46%	5.0	66	1.0%
200–300 m	3.2	27	0.40%	4.6	56	0.88%
300–400 m	2.3	13	0.20%	3.2	28	0.43%
400–500 m	1.7	7.7	0.11%	2.4	16	0.24%

The example table above provides the following information:

- At any location on level ground within 50 m of the base of the tower, the highest calculated level of RF EME coming from the existing equipment at this base station is 0.01% or approximately 1/10000 of the ARPANSA Standard exposure limit. In physical units this is a power density of 0.87 milliwatts per metre squared (mW/m^2), equivalent to an electric field strength of 0.57 volts per metre (V/m).
- Subsequent to the proposed alterations to the equipment at this site, at any location on level ground within 50 m of the base of the tower, the highest calculated level of RF EME rises to a power density of 7.18 mW/m^2 or an electric field strength of 1.65 V/m which is equivalent to 0.09% of the ARPANSA Standard exposure limit (or less than 1/1000 of the limit).
- The values reported here are only expected to occur when the transmitters are all operating at full power and where there is clear line-of-sight to all antennas. Levels indoors will be lower.
- At any distance within 500 m of the tower the table can be used to determine the maximum level. For example at a location 330 m from the tower, that is between 300 m and 400 m, the calculated level will be less than 0.2% of the ARPANSA Standard exposure limit for the existing equipment and 0.43% of the ARPANSA Standard exposure limit for the existing and proposed equipment. In many directions, and at most times, the actual level will be much lower than this calculated level.

- For a new wireless base station where there are no antennas already installed, the above table will only contain data under the 'Proposed Configuration' columns. Similarly, for a wireless base station that is not being upgraded, the table will only contain data under the 'Existing Configuration' columns.

This table is not included in EME reports for small cells due to the more localised emission from these installations.

It should be noted that all values quoted in the above two tables are calculated at 1.5 m above ground level in a flat landscape. As stated in the section "Effects of Landscape (topography)", If the ground height changes enough to cause significant under estimation of the worst case environmental levels, further calculations shall be reported in the "Other Areas Of Interest" section.

Example Table of Calculated EME levels at Other Areas of Interest

Location	Height range	Electric field (V/m)	Power density (mW/m^2)	Percentage of the public exposure limit
ABC Primary School	0–6 m	2.6	18	0.29%
123 Sports Centre	0–6 m	2.4	15	0.23%
XYZ Community Centre	0–6 m	2.6	18	0.29%

The 'Calculated EME levels at other areas of interest' table provides calculated levels of RF EME at locations considered to be of special community interest or at elevated locations where there may be concern about higher levels of EME. The calculations are performed over the indicated height range and include all existing and any proposed radio systems for this site This table is included in reports for both wireless base stations and small cells.

Further Information

The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) is a Federal Government agency incorporated under the Health portfolio. ARPANSA is charged with responsibility for protecting the health and safety of people, and the environment, from the harmful effects of radiation (ionising and non-ionising).

Information about RF EME can be accessed at the ARPANSA website, http://www.arpansa.gov.au, including:

- The procedure used for the calculations in this report is documented in the ARPANSA Technical Report; "Radio Frequency EME Exposure Levels - Prediction Methodologies"
- The ARPANSA RF Standard
- Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), 2002, 'Radiation Protection Standard: Maximum Exposure Levels to Radiofrequency Fields — 3 kHz to 300 GHz', Radiation Protection Series Publication No. 3, ARPANSA, Yallambie Australia.

The Australian Communications and Media Authority (ACMA) is responsible for the regulation of broadcasting, radiocommunications, telecommunications and online content. Information on EME is available at http://www.acma.gov.au/Citizen/Spectrum/About-spectrum/EME-hub

The Communications Alliance Ltd Industry Code C564:2011 'Mobile Phone Base Station Deployment' is available from the Communications Alliance Ltd website, http://commsalliance.com.au.

Contact details for the Carriers (mobile network companies) operating in Australia and the most recent version of each site's Environmental EME Report are available online at the Radio Frequency National Site Archive, http://www.rfnsa.com.au.

Environmental EME Report

Location	Lot 8 Macfarlane Place, CAMPBELLTOWN SA 5074		
Date	18/10/2022	**RFNSA No.**	5074005

How does this report work?

This report provides a summary of levels of radiofrequency (RF) electromagnetic energy (EME) around the wireless base station at Lot 8 Macfarlane Place, CAMPBELLTOWN SA 5074. 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

The maximum EME level calculated for the **existing** systems at this site is

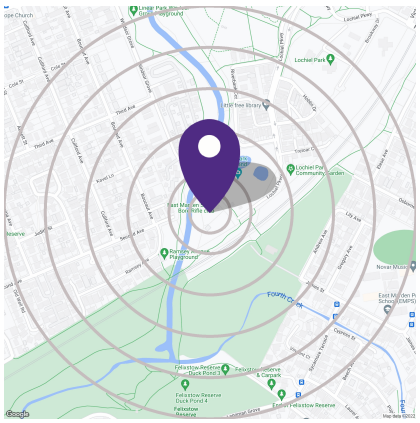
3.80%

out of 100% of the public exposure limit, 51 m from the location.

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

4.53%

out of 100% of the public exposure limit, 146 m from the location.



EME levels with the proposed changes

Distance from the site	Percentage of the public exposure limit
0-50 m	3.39%
50-100 m	3.59%
100-200 m	4.53%
200-300 m	3.51%
300-400 m	1.70%
400-500 m	0.94%

For additional information please refer to the EME ARPANSA Report annexure for this site which can be found at *http://www.rfnsa.com.au/5074005*.

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.

	Existing		Proposed	
Carrier	**Systems**	**Configuration**	**Systems**	**Configuration**
Vodafone	3G, 4G	WCDMA900, LTE1800, LTE850, LTE2100	3G, 5G	WCDMA900, NR/LTE700 (proposed), NR/LTE850, NR/LTE1800, NR/LTE2100, NR3500 (proposed)

Optus	3G, 4G	WCDMA900, WCDMA2100, LTE700, LTE2600, LTE2300, LTE1800, LTE2100	3G, 4G, 5G	WCDMA2100, NR/LTE700, NR/LTE900 (proposed), WCDMA900, LTE1800, NR/LTE2100, LTE2300, LTE2600, NR3500 (proposed)
Telstra	3G, 4G, 5G	NR3500, LTE700, NR850, WCDMA850, LTE1800, LTE2100, LTE2600	3G, 4G, 5G	NR3500, LTE700, NR850, WCDMA850, LTE1800, LTE2100, LTE2600

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 360º circular bands.

	Existing configuration			Proposed configuration		
Distance from the site	Electric field (V/m)	Power density (mW/m²)	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m²)	Percentage of the public exposure limit
0-50m	11.29	338.02	3.54%	11.15	329.69	3.39%
50-100m	11.55	353.90	3.80%	11.33	340.34	3.59%
100-200m	8.74	202.74	2.96%	11.40	344.70	4.53%
200-300m	8.01	170.25	2.39%	10.15	273.53	3.51%
300-400m	5.61	83.58	1.16%	7.08	132.87	1.70%
400-500m	4.20	46.89	0.65%	5.26	73.47	0.94%

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/m²)	Percentage of the public exposure limit
Residential Dwellimg	0-4 m	5.33	75.48	0.78%

SITE COMPLIANCE CERTIFICATE

RFNSA Site No: 5074005

Site Address: JAMES ST, CAMPBELLTOWN, SA 5074

Issued in accordance with the Radiocommunications Licence Conditions (Apparatus Licence) Determination 2015.

RF Human Exposure Limits

The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) has produced a standard for exposure to Radio Frequency (RF) transmissions – ARPANSA Radiation Protection Standard 2002 Maximum Exposure Levels to Radio Frequency Fields – 3 kHz to 300 GHz (RPS3).

The Australian Communications and Media Authority (ACMA) has made the Radiocommunications Licence Conditions (Apparatus Licence) Determination 2015 that requires that the general public is not exposed to RF transmission levels exceeding the general public limits specified in the ARPANSA Standard (RPS3).

State and Commonwealth Occupational Health & Safety laws require compliance with the limits and obligations set out in the ARPANSA standard (RPS3).

Compliance Statement

This site has been assessed and found to comply with the RF Human Exposure Limits as specified by the ACMA Licence Condition Determination and requirements of the ARPANSA Standard RPS3.

Mobile Telecommunications Equipment

The mobile telecommunications equipment installed at this site and its configuration as a mobile base station, has been assessed in accordance with the ARPANSA RPS3 reference limits, and has been deemed to comply with the ACMA Licence Conditions (Apparatus Licence) Determination 2015.

Other Radio Frequency Transmitting Equipment

All identified radio communications services are included in the related compliance documents listed below.

Access Controls, RF Warning Signs and Safe Work Procedures

Access Control, RF warning signs (if required) and Safe Working Procedures are in place as detailed in the Related Documents listed below.

EXAMPLE Report

Compliance Certificate No: 06

Accreditation No: 20223

Approved Signatory

Name: Oanh Nguyen

Designation: EME Specialist

Company: Visionstream Australia Pty Ltd

Signature

Date: ***27/07/2020***

Related Documents:		
	Site Compliance Report	Ref No# **06**
	EME Guide for Site Safety	Ref No# **06**

Acumentis
DECISION CERTAINTY

Acumentis (SA) Pty Ltd
ABN 80 153 381 778
ACN 153 381 778

Suite 3B/65 King William Street, Kent
Town SA 5067
GPO Box 3359, Sydney NSW 2001
Australia

Telephone: (08) 7225 7288

18 July 2023

Allison Down
Campbelltown City Council,
172 Montacute Road,
Rostrevor, SA, 5073

Dear Allison,

Preliminary Market Rent Advice – Portion of 135 Montacute Road, Campbelltown, SA, 5074

Thank you for the opportunity to provide you with some preliminary advice as to the market rent of a telecommunications tower on a portion of the council held asset at 135 Montacute Road, Campbelltown.

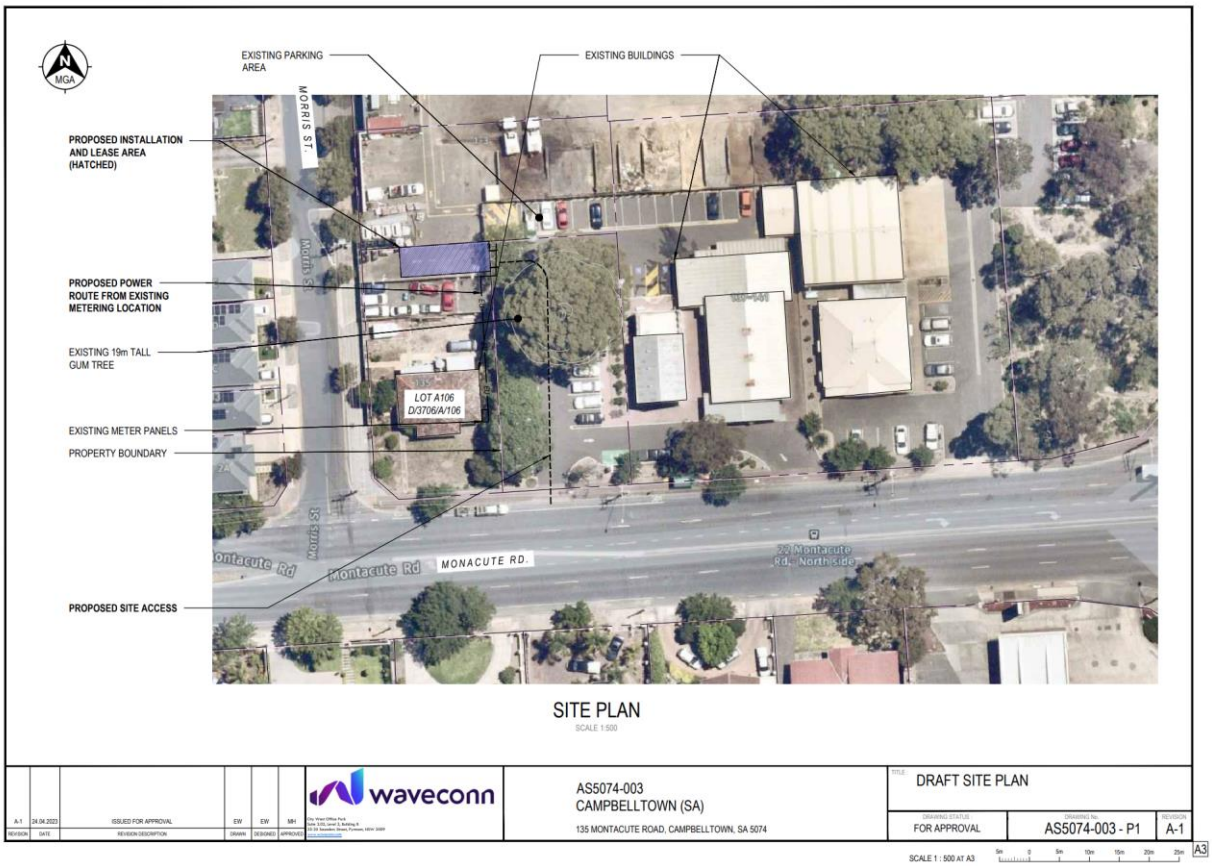
We understand that 135 Montacute Road, Campbelltown also incorporates 2-8 Newton Road, Campbelltown and 1-3 Morris Street, Campbelltown. The three addresses are collectively held in-one-line and are currently utilised as the councils 'Works Department/Depot'.

The collective site (approximately 1.244ha) comprises a cluster of buildings/improvements including a former dwelling converted for use as offices, commercial offices and various workshops/warehouses and shedding, together with significant hard stand, parking and associated ancillary improvements.

We note that the portion of the site suitable site for the telecommunications infrastructure is situated on Allotment 106, Deposited Plan 3706, Certificate of Title Volume 5337, Folio 514. This parcel is within the land used for Depot operations; in the southwestern corner of the greater site operated by the Campbelltown City Council.

We understand that the portion of the site under review is a small and relatively unimproved section, located to the south-western corner of the greater site. Refer to the below diagram.

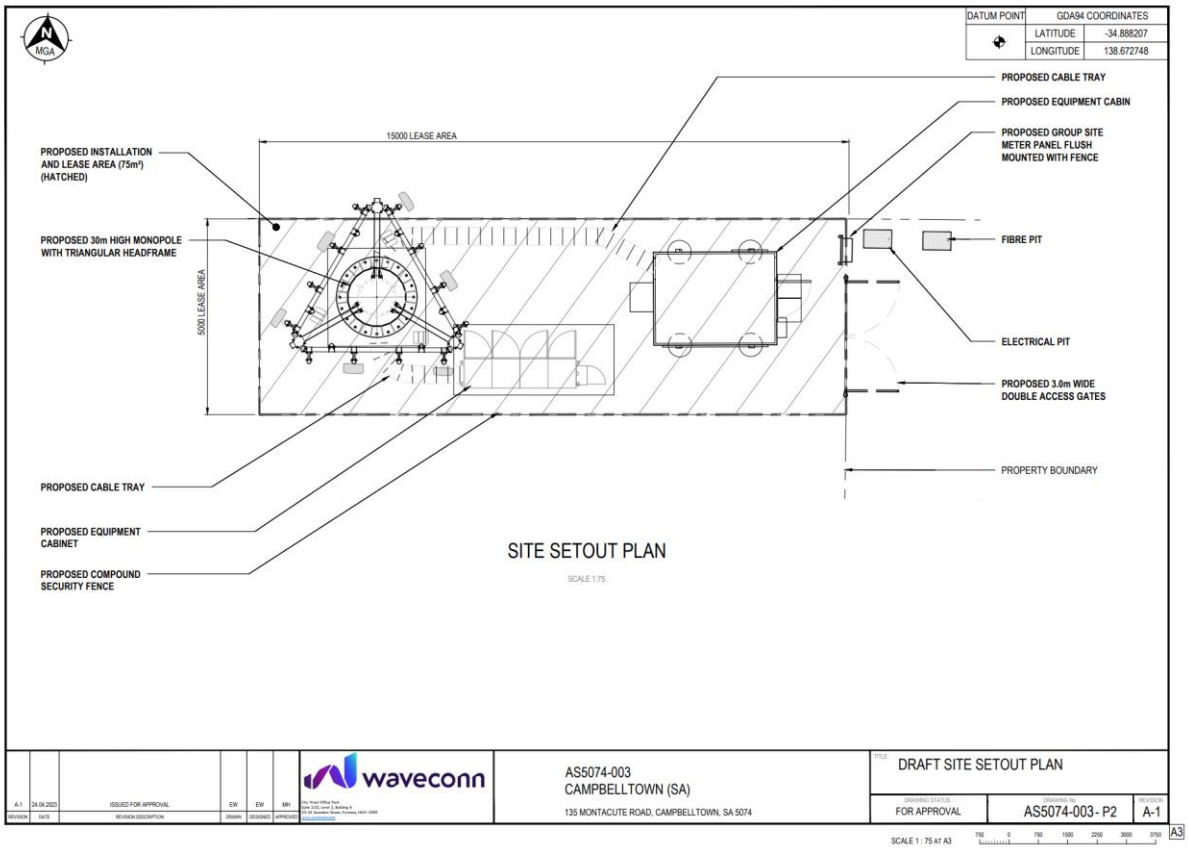

MORRIS STREET
NEWTON ROAD
MONTACUTE ROAD
1
4
28
137
135

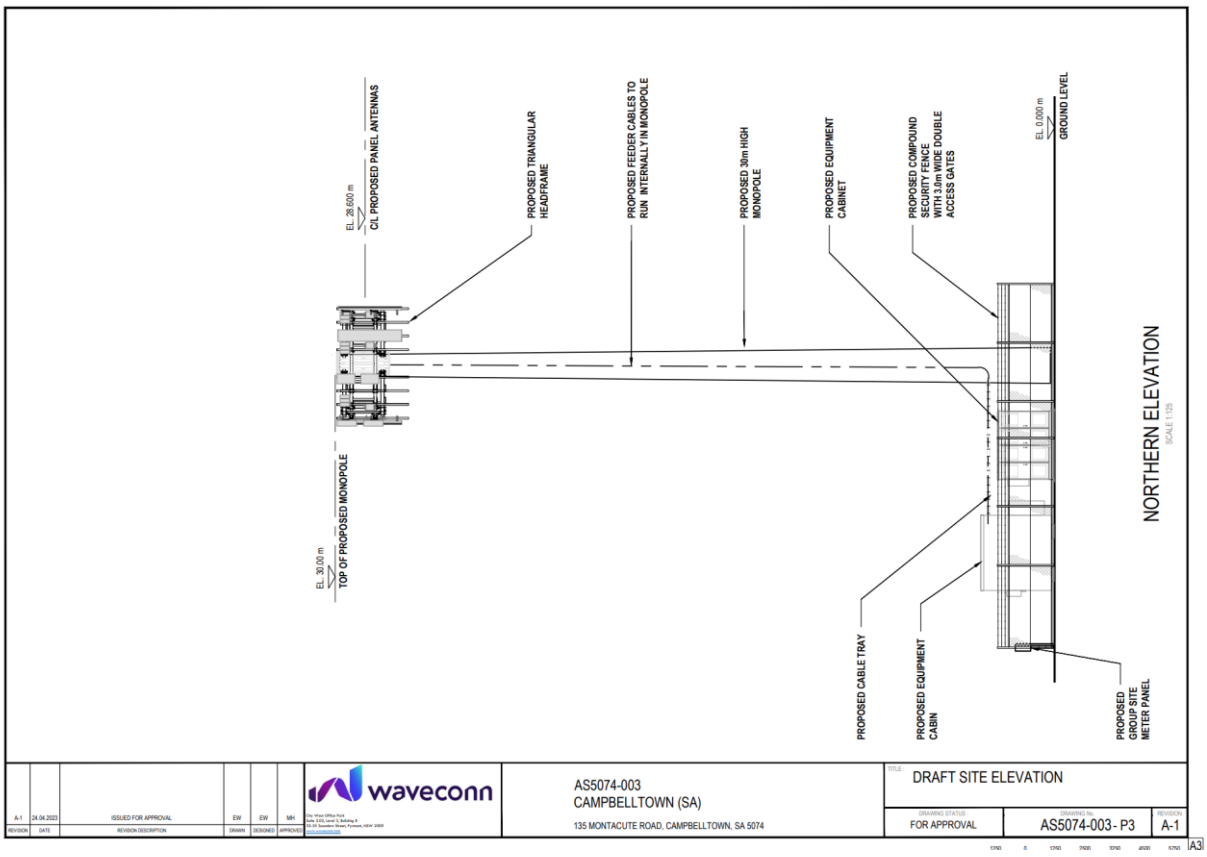

EXISTING PARKING AREA
EXISTING BUILDINGS
MGA
PROPOSED INSTALLATION AND LEASE AREA (HATCHED)
PROPOSED POWER ROUTE FROM EXISTING METERING LOCATION
EXISTING 19m TALL GUM TREE
EXISTING METER PANELS
PROPERTY BOUNDARY
PROPOSED SITE ACCESS
MORRIS ST.
LOT A106
D/3706/A/106
MONACUTE RD.
22 Montacute Rd, North Side
SITE PLAN
SCALE 1:500
waveconn
AS5074-003
CAMPBELLTOWN (SA)
135 MONTACUTE ROAD, CAMPBELLTOWN, SA 5074
DRAFT SITE PLAN
FOR APPROVAL
AS5074-003 - P1
A-1
SCALE 1 : 500 AT A3
A3

A.

As per the infrastructure provider Waveconn, the parcel of land required is 60sqm, measuring 5m x 15m. The structure proposed monopole with triangular headframe to be constructed on this parcel is estimated to reach 28.6m in height.

Waveconn also note that the existing 19m high gum tree that sits adjacent to the site is not considered at risk, however, may require some pruning/maintenance. The proposed access to the site is via Montacute Road, through the car park of the neighbouring parcel and therefore there would be minimal disruption to the Depot operations to the north throughout construction. Waveconn also note that Construction to carrier commitment is expected to take between six months to two years. The standard term of lease tenure is 30 years. Refer to the diagram provided by Waveconn bellow.





Initial advice from Waveconn's consultants Prorealty have indicated that Waveconn have offered to lease the 'subject site' for a rental fee of $18,000 plus GST per annum with increases of 2.5% annually.

Waveconn and Prorealty note that On March 7, 2023, The Campbelltown City Council approved the lease renewal of Lot 27 Virginia Road, Newton to Amplitel. The rental fee for 2022/2023 was $29,319 (excluding GST) and is subject to annual increases of 5%. We have been instructed to assess the market rental rate and provide professional advice on whether the offer from Waveconn is within market parameters.

In order to determine the market rent of the subject site for telecommunication purposes, we have given consideration to market evidence for other telecommunications towers/infrastructure in the general area, which include but are not limited to the following:

202-204 HUTT STREET, ADELAIDE



Commencement Date	1/3/21
Rent PA (Ex. GST)	$27,192
Tenant	Telstra
Term (years)	10
Options	5

The property comprises a character mixed use building in the Adelaide CBD. The property is leased to 4 tenants, one of which being Telstra who utilise a telecommunication service on the roof. Rent is subject to fixed 3% reviews.

21 HEATH STREET, LONSDALE



Commencement Date	1/11/21
Rent PA (Ex. GST)	$17,389
Tenant	Telstra
Term (years)	5
Options	5+5

The property comprises a 680sqm office and industrial property, that includes a telecommunications tower, currently leased to Telstra. Rent is subject to fixed 3% reviews.

51 JOHN WATSON DRIVE, MOUNT GAMBIER



Commencement Date	1/8/18
Rent PA (Ex. GST)	$29,647
Tenant	Optus
Term (years)	10
Options	10

The property comprises a former TV studio production building, totalling 850sqm of offices and studio areas. The site is also subject to multiple telecommunication tower leases to both Optus and Vodafone. Rent is subject to fixed 3% reviews.

12-18 BEACH ROAD, CHRISTIES BEACH



Commencement Date	1/5/17
Rent PA (Ex. GST)	$ 19,105
Tenant	Telstra
Term (years)	10
Options	None

The property comprises a 3 shops on 3 titles, currently let as a whole in the southern Adelaide suburb of Christies Beach. Lot 79 includes a telecommunication tower currently leased to Telstra. We note there is also a second tower on site currently let to Vodafone, which we believe is underlet for $5,000 P.A. Rent review mechanism unknown.

17-19 ADELAIDE ROAD, MURRAY BRIDGE



Commencement Date	24/6/19
Rent PA (Ex. GST)	$12,923
Tenant	Optus

Term (years)	5
Options	5

The subject property comprises a two story retain and office building, situated on a large site in the regional town of Murray Bridge. The site includes two mobile phone towers at the rear of the allotment. Rent is subject to fixed 3% reviews.

17-19 ADELAIDE ROAD, MURRAY BRIDGE



Commencement Date	1/8/21
Rent PA (Ex. GST)	$14,121
Tenant	Telstra
Term (years)	5
Options	None

The subject property comprises a two story retain and office building, situated on a large site in the regional town of Murray Bridge. The site includes two mobile phone towers at the rear of the allotment. Rent is subject to fixed 3% reviews.

Summary:

We note that the above leasing evidence provides an indicative rental range of between $12,923 to $29,647 per annum for the use of telecommunication towers. The low end of the range was achieved by a tower set in an inferior position in the regional town of Murray Bridge, whilst the upper end of the range was achieved by tower set in an inferior position in the regional town of Mount Gambier. We note the Optus tower at the upper end of this range was subject to significant infrastructure as per the Licence Agreement.

With regards to the attributes of the subject, we assume a market rent range of between $18,000 P.A to of $24,000 P.A would appropriate. On this basis, it may be advised to request that the initial consideration be increased to the mid-point of $21,000 P.A.

In regard to the proposed fixed increases of 2.5% P.A, we believe this figure is slightly bellow market parameters. We believe that with recent CPI increases above this number, fixing the rate increases to CPI or agreeing to a higher fixed rate of 3%-5% increases would be in your best interest and tenable in current market conditions.

Should you require any additional information, please feel free to contact me directly for assistance.

Yours sincerely

Mark Robins
State Director - SA
ACUMENTIS SA PTY LTD