

FW: Re DA AOO6823050!

From
Date
To
Cc

 2 attachments (1 MB)

SECURITY LABEL: OFFICIAL

From:
Sent: Sunday, 3 May 2026 3:22 PM
To: dalodgement <dalodgement@brisbane.qld.gov.au>
Cc: DA RECORDS <DA_RECORDS@brisbane.qld.gov.au>
Subject: Re DA AOO6823050!

This email originates from outside of Brisbane City Council.

Adjunct to copy express mailed 28.426

Sent from my iPhone

28 April 2026

Brisbane City Council – DA Lodgement (Submissions)
GPO Box 1434
BRISBANE QLD 4001

By email: dalodgement@brisbane.qld.gov.au

Attention: Assessment Manager

Re: PROPERLY MADE SUBMISSION / OBJECTION

Development Application A006823050 – Telecommunications facility (max height 35m)
49 Trossachs Place, Upper Kedron QLD 4055 (Lot 11 RP179242)

Submitters

1. Executive summary (what we are asking Council to do)

We lodge this submission as an objection to DA A006823050.

We respectfully request Council **REFUSE** the application. In the alternative, Council should issue an information request and/or impose strict conditions (if approval is contemplated) to:

- require a corrected and expanded visual amenity assessment that includes Emmaron Court (CTS21306) and nearby properties within Moreton Bay Regional Council (MBRC) with potential direct sightlines;
- require an independent ecological assessment addressing habitat values and wildlife movement (including koalas and habitat trees), and the risk of indirect vegetation loss over time; and
- require a construction and access management plan confirming access routes, preventing obstruction of Emmaron Court, and ensuring any damage to the private road is not borne by residents.

2. Key planning grounds of objection

Ground 1 — Visual amenity impacts have not been properly assessed (Telecommunications facility code PO3)

The Telecommunications facility code requires that a new telecommunications facility does not adversely impact the level of visual amenity of adjoining existing, approved and planned uses and is located to reduce visual prominence. The code contemplates a “visual representation” depicting views from predicted vantage points such as from habitable rooms and other relevant viewpoints.

Our primary visual impact is at the entrance and along the access path of Emmaron Court:

- The proposed 35m tower will be visible each time we drive or walk into and out of the entrance of Emmaron Court.
- This means the structure becomes a dominant element in the daily access experience and (importantly) the first visible feature for any visitor or prospective buyer approaching our homes via Emmaron Court.

We understand the Visual Amenity reporting does not appear to consider Emmaron Court properties or MBRC-side impacts, despite the locality being immediately adjacent to the council boundary and Emmaron Court being the access spine to multiple residences.

We request Council require:

- revised photomontages and/or verified view-shed analysis from agreed locations including: (i) Emmaron Court entrance and multiple points along Emmaron Court; (ii) affected private property viewpoints (habitable rooms/outdoor living areas where relevant); and (iii) any broader public vantage points where ridgeline/silhouette impacts occur; and
- explicit cross-boundary consideration of impacts on nearby MBRC properties and users of Emmaron Court.

Ground 2 — Inconsistency with Environmental Management Zone intent and outcomes

The subject land is identified (including by the applicant) as being within the Environmental Management Zone, which is intended to identify environmentally sensitive areas and provide for protection of those areas from urban/industry activities, supporting ecological assets and environmental functions.

A 35m monopole is a tall industrial form in a bushland setting and, in this location, risks undermining the environmental/landscape character and amenity values the zone is intended to protect. The applicant's reliance on "no vegetation removal required" does not resolve the broader incompatibility and ongoing operational impacts in a sensitive zone.

Ground 3 — Private road access, construction impacts and risk to residents' only entry/exit (Emmaron Court)

Emmaron Court is a legal road owned and maintained by the five Emmaron Court residents under CTS21306 and lies within the Moreton Bay Regional Council (MBRC) area. It is the only access route for the five Emmaron Court homes.

If construction or maintenance traffic uses Emmaron Court:

- residents could be obstructed from accessing their homes (no alternative entrance);
- any damage to the road would, absent conditions or agreements, likely be borne by residents.

We have not seen a clear, enforceable statement in the application material confirming construction access routes and excluding reliance on Emmaron Court.

We request Council require:

- a construction management plan identifying access routes, vehicle types, turning/staging arrangements and hours;
- conditions prohibiting obstruction of Emmaron Court, and requiring advance notice to affected residents; and
- conditions requiring the proponent to make good any damage to Emmaron Court caused by construction or maintenance activities (including reinstatement standards and timelines).

Ground 4 — Koala habitat constraints and ecological sensitivity warrant independent review

Residents in the immediate locality have observed koalas in the area and consider the ridgeline and adjacent vegetated lands to function as habitat and movement corridors.

Further, a number of years ago, we sought approval from the then Moreton Shire/Moreton Bay Council to construct three pole houses on land adjacent to Emmaron Court (on the left-hand side), and were refused on the basis that the land was designated koala habitat. We are in the process of retrieving the supporting documentation / refusal reasons.

In these circumstances, Council should not accept a bare mapping statement as a substitute for proper ecological inquiry where there is credible local evidence of koala presence and known habitat constraints. Council should require an independent ecological assessment addressing:

- koala habitat trees (including feed trees) and habitat function;
- wildlife movement corridors and fragmentation risk;
- construction and operational disturbance; and
- the risk of indirect vegetation loss over time for access, maintenance or bushfire-related requirements.

Ground 5 — Alternatives and location justification (impact assessment context)

Given this is an impact assessable application, Council should require a genuine alternatives analysis demonstrating why:

- co-location on existing structures is not feasible; and/or
- a less environmentally sensitive site cannot achieve the intended network outcome; and/or
- lower-impact design outcomes (height reduction, alternate siting, or alternative technologies) cannot reduce visual and environmental impacts.

3. Council action requested

We request Council:

- Refuse the application; OR
- at minimum, issue an information request requiring:
 - revised visual amenity assessment and photomontages including Emmaron Court and affected MBRC properties/users;
 - a construction/access management plan confirming routes and protections for Emmaron Court residents;
 - an independent ecological assessment addressing habitat values, koalas, and indirect vegetation impacts; and
 - a genuine alternatives analysis.

If Council is nonetheless minded to approve, approval should include enforceable conditions including:

- colour/finish requirements (matte, recessive colouring);
- no increase in height or infrastructure envelope without further approval;
- strict controls on access routes and prohibition on obstructing Emmaron Court;
- “make good” obligations for any private road damage;
- strict prohibition on vegetation clearing beyond the approved footprint and access route; and
- decommissioning and rehabilitation obligations at end of life.

4. Attachments

- Attachment A: Photos showing Emmaron Court entrance and likely tower visibility viewpoints (previously provided)
- Attachment B: Map / plan extracts showing Emmaron Court (CTS21306), MBRC boundary proximity, and relationship to tower site
- Attachment C: Evidence of koala sightings in the area (photos previously provided)
- Attachment D: Prior refusal documentation regarding koala habitat (to be provided once retrieved, if available)

Yours faithfully,

