

Our ref: WR25/30312 / OUT25/5260
Your ref: EXE25/0004

20 October 2025

Sunshine Coast Council
mail@sunshinecoast.qld.gov.au

Attention: Mr Murray Dunn

Dear Mr Dunn

Agreement to an exemption certificate

The State Assessment and Referral Agency (SARA) received your request for an exemption certificate to be given for the development described below on 26 September 2025. This request has been made in response to an application made by Downer Group on behalf of Telstra.

Under section 46(2)(b) of the *Planning Act 2016*, SARA advises that an exemption certificate is given for the development described below.

Applicant details

Applicant name:	Sunshine Coast Council
Applicant contact details:	Locked Bag 72, SCMC, QLD 4560 mail@sunshinecoast.qld.gov.au

Premises details

Real property description:	Lot 2 on AP22458
Street address:	Mooloolah River National Park, Old Caloundra Road, Glenview
Local government area:	Sunshine Coast Council

Development details

Description:	Development permit for a material change of use for upgrades to a Telecommunications Facility on Lot 2 AP22458
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As described above and in accordance with the following documentation:

Documents title	Prepared by	Date
Request for Exemption Certificate under the <i>Planning Act 2016</i> clause 46 – proposed upgrades to an existing telecommunication facility at Mooloolah River National Park (Meridian Hill section), near Old Caloundra Road, Glenview QLD 4553 (Lot 2 on AP22458)	Downer Group	15 September 2025
Electromagnetic energy report	Downer Group	31 July 2025
Site Layout and Access	Downer Group	11 August 2025
Antenna Layout	Downer Group	11 August 2025
West Elevation	Downer Group	11 August 2025
Antenna Configuration Table	Downer Group	11 August 2025

Referral agencies

Not applicable.

Assessable development

This exemption certificate relates to the following provision of the Planning Regulation 2017:

- Schedule 10, Part 9, Division 4, Subdivision 2, Table 4, Item 1- Material change of use of premises near a State transport corridor.

Human rights consideration

A consideration of the 23 fundamental human rights protected under the *Human Rights Act 2019* has been undertaken as part of this decision. It has been determined that the proposed works are reasonable and justifiable based on the circumstances of the works. Any limitation of human rights is temporary and there are no less restrictive ways to achieve the purpose of the works.

Reasons for giving the exemption certificate

This exemption certificate is given as the effects of the development would be minor or inconsequential, considering the circumstances under which the development was categorised as assessable development.

When exemption certificate ceases to have effect

Pursuant to section 46(8) of the *Planning Act 2016*, this exemption certificate has effect for two years.

For further information please contact Celeste Bownds, Senior Planning Officer, SEQ North, on (07) 5352 9708, or via email SEQNorthSARA@dsdilgp.qld.gov.au who will be pleased to assist.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Hanna', with a stylized flourish at the end.

Kieran Hanna
A/Director
Planning Services
Planning Group



15 September 2025

Sunshine Coast Council
Locked Bag 72
Sunshine Coast Mail Centre QLD 4560

Via email: mail@sunshinecoast.qld.gov.au

Request for Exemption Certificate under The Planning Act 2016 clause 46 – proposed upgrades to an existing telecommunications facility at Mooloolah River National Park (Meridian Hill section), near Old Caloundra Road, Glenview QLD 4553 (Lot 2 on AP22458)

We write on behalf of Telstra, who are proposing to undertake minor upgrade works on an existing telecommunications tower (monopole) at the above address. The proposed upgrades will provide improvements to the Telstra mobile network in Glenview and surrounds. The location of the existing facility within Mooloolah River National Park is shown below in *Figure 1*. The facility is one of two telecommunications facilities within the area of the National Park as shown below in *Figure 2*.

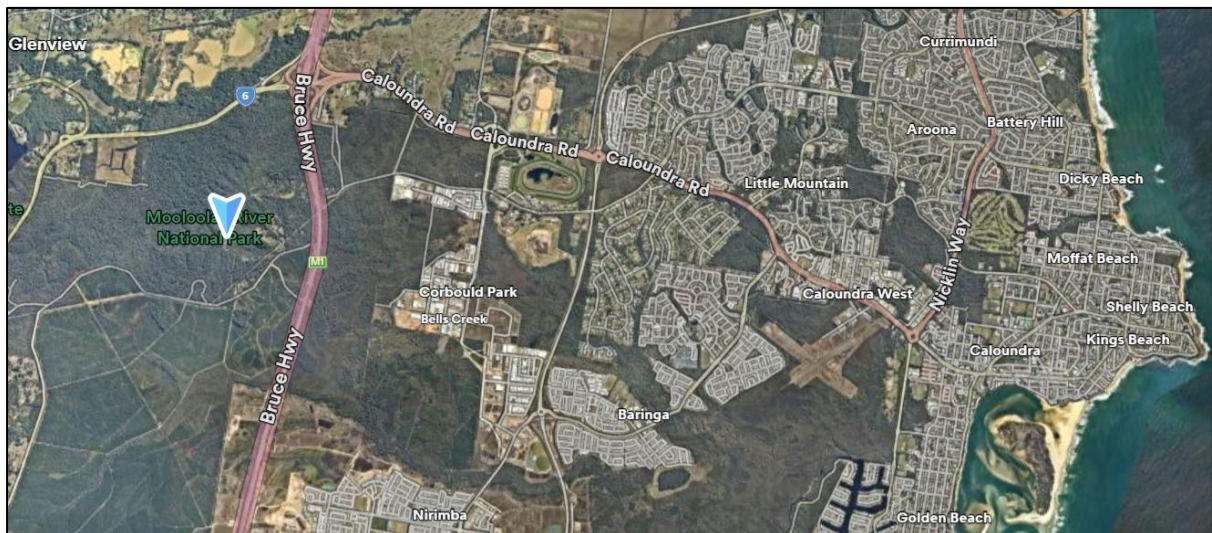


Figure 1: Existing telecommunications facility site location indicated by blue arrow. (Source: NearMaps, 2025)



Figure 2: Existing telecommunications facilities within Mooloolah River National Park, Meridian Hill section. The existing monopole upon which Telstra equipment is proposed to be upgraded is shown with red circle. (Source: RFNSA, 2025)



Proposed Upgrade

The proposed Telstra upgrades involve:

- Removal of 11 x existing Panel antennas (each not exceeding 2.8m in length).
- Installation of 9 x new Panel antennas (each not exceeding 2.8m in length).
- Installation, reuse, and removal of ancillary equipment such as RRUs, TMAs, transceivers, amplifiers, antenna mounts, ladder, cable trays, feeders, cabling, combiners, diplexers, splitters, couplers, jumpers, filters, electrical equipment, signage, and other associated equipment. Utilisation of the existing Telstra equipment shelter within the compound.

The proposed works do not involve any ground disturbance or removal of vegetation; all works will be confined to the existing tower or within the telecommunications compound.

The existing facility is shown below in *Figure 3*. The proposed upgrade works involve minor changes to the appearance of the facility, which will not increase the height of the tower, or obviously change the appearance of the tower from the ground level.



Figure 3: Existing telecommunications facility hosting Telstra equipment. (Source: RFNSA, 2025)

Classification and Approval Requirements

These upgrades would normally be classified as a Low Impact proposal under the *Telecommunications (Low Impact Facilities) Determination 2018* (the Determination) and would not require development consent. However, as site is located within Mooloolah River National Park, under the Determination, National Parks are considered to be “Areas of Environmental Significance (AES)”. Under the Determination, works within “Areas of Environmental Significance” cannot be deemed ‘Low Impact’, and as such, the proposed upgrade would require Council Development Approval.



It is noted that the proposed works will be minor and ordinarily permissible under the Determination. The proposed works will not increase the height of the facility, substantially increase its bulk, or change its appearance. There are no works proposed outside of the telecommunications compound, no ground disturbance, and no disturbance to vegetation. While the facility does not fall within federal Low Impact parameters because of its 'AES' classification, we note that it does not intensify the existing use sufficiently to trigger a Material Change of Use.

As such, we are writing to request an Exemption Certificate under section 46 of *The Planning Act 2016* for the facility that is in an AES.

Justification for Exemption Certificate

The application is made on the following grounds:

- Under the Act section 46, clause 3(b)(i), exemption certificates can be issued if *“the effects of the development would be minor or inconsequential, considering the circumstances under which the development was categorized as accessible development”*.
- The effect of the proposed upgrade works to the facility is anticipated to be minor and inconsequential. The telecommunications tower (monopole) is well established and hosts telecommunications equipment belonging to Telstra. The proposed upgrade works involve minor changes to the appearance of the facility, which will not increase the height of the tower, or obviously change the appearance of the tower from the ground level. The proposed works would ordinarily be 'Low Impact' and would not require DA consent, except for its location within a National Park.
- The ongoing operation of the facility does not have any adverse impacts on the National Park. The proposed upgrade works will be confined to the existing tower or within the compound, with no ground disturbance or vegetation impact. They will not have any unreasonable impact on flora, fauna, or biodiversity values at the site.
- While the works do not fit within federal Low Impact parameters, because it is within a National Park, it does not trigger a *Material Change of Use* as per the definition in Schedule 2 of the *Planning Act 2016*.
 - The works do not represent the start of a new use of the premises.
 - The works do not involve re-establishment of a formerly abandoned use.
 - The works do not represent a material increase in the intensity or scale of the use of the premises, in this case the existing telecommunications facility. The overall facility is a 25m monopole tower hosting Telstra equipment. In the context of the overall facility, the proposed installation and replacement of the equipment is minor and inconsequential.
- The proposal is only considered assessable development because it does not fall within Low Impact parameters. However, the works are not sufficient to be considered a Material Change of Use. Given the circumstances by which the proposal is categorised as assessable development, we consider an Exemption Certificate is an appropriate planning pathway. The alternative would be to lodge an Impact Assessable Development Application for the proposed works.

A copy of the proposal plans is attached for reference.



Further information about this proposal is available at www.rfnsa/4553001

We trust that you will find the information about this proposal informative. Should you require any further information please contact the undersigned at Alexandra.dempsey@downergroup.com.

Yours sincerely,

Alexandra Dempsey
Town Planner
Downer

Attachments

- | | |
|-------------------|-----------------------|
| - EME report | <i>1 page</i> |
| - Proposal plans, | <i>4 pages</i> |

Electromagnetic energy report

Location	LOT2 AP22458, OLD CALOUNDRA RD, GLENVIEW QLD 4553		
Date	31/07/2025	RFNSA No.	4553001

This report contains **calculated** electromagnetic energy (EME) exposure levels from the wireless technology base station listed above.

EME levels for this site have been **calculated** as a percentage of the limit given by the [Australian Safety Standard](#). This report is produced according to a technical [methodology](#) developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).

EME levels below 100% comply with the Australian Safety Standard and are safe for the public.

Service operators and technology at the site

Vodafone	Optus	Telstra		
4G, 5G	3G, 4G, 5G	4G, 5G		

For more information on the infrastructure at this site, such as specific wireless technologies, visit <http://www.rfnsa.com.au/4553001>.

Calculated EME levels

Areas of interest	Maximum EME level (% of limit)	Safe level (<100%)
Environmental EME Level (1.5m above ground out to 500m from site)	7.00%	YES
No locations identified		

About electromagnetic energy

Many things in our everyday lives produce electromagnetic energy including natural sources like the sun, and artificial sources like broadcast media, electric power, microwave ovens, and wireless technology like Wi-Fi and mobile phones.

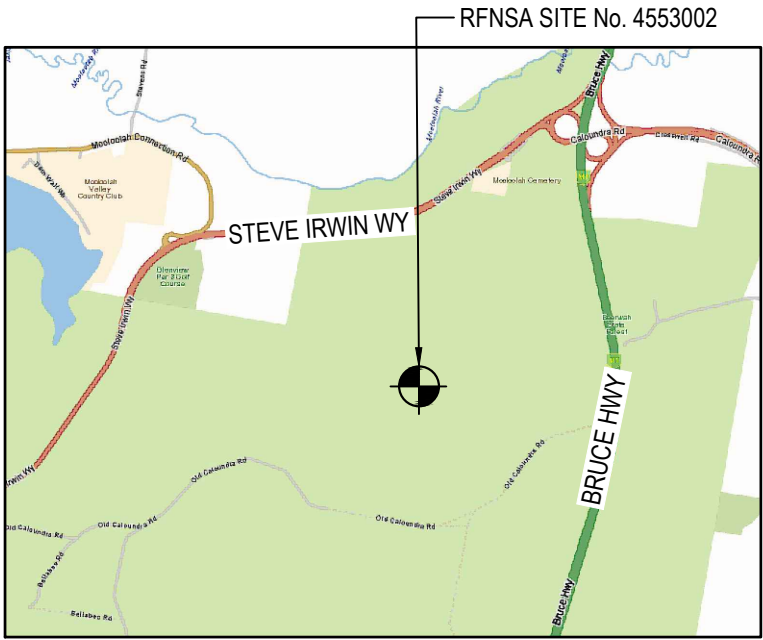
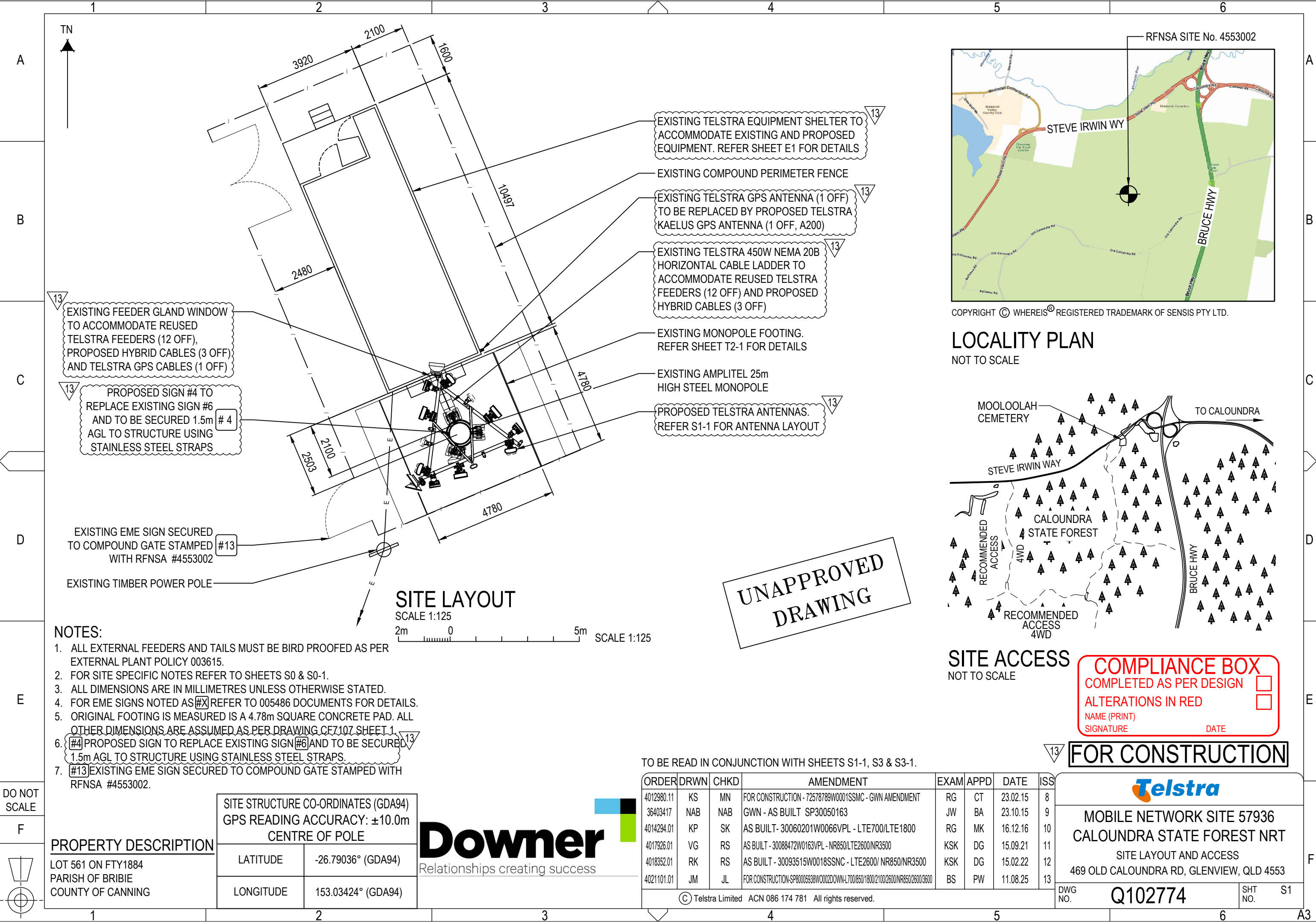
The EME that you are exposed to from mobile phone towers is low, and similar to your exposure from broadcast transmissions such as radio and TV.

It is the [assessment of ARPANSA](#) that there is no credible health risk from exposure to the low-level EME associated with telecommunications and wireless technology below the limits set in the Australian Safety Standard.

Further information

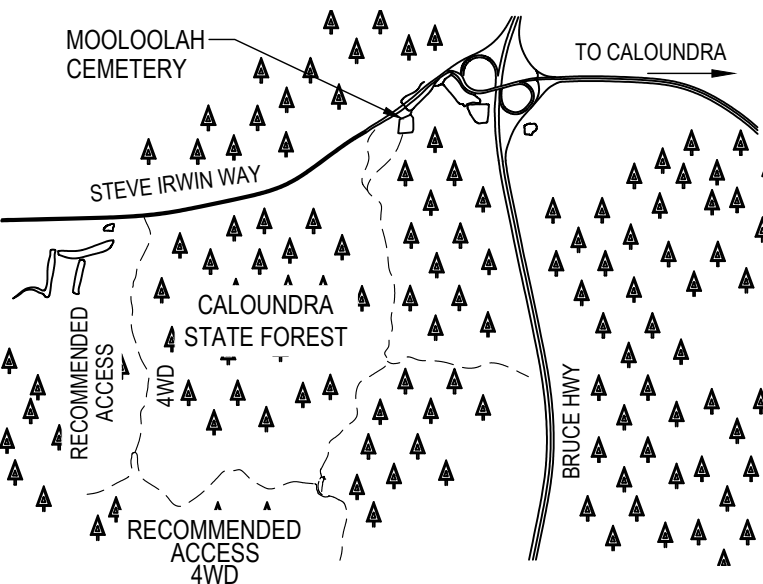
ARPANSA (The Australian Radiation Protection and Nuclear Safety Agency) www.arpansa.gov.au

ACMA (The Australian Communications and Media Authority) www.acma.gov.au/eme-5g-and-you#eme



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LOCALITY PLAN
NOT TO SCALE



SITE ACCESS
NOT TO SCALE

COMPLIANCE BOX

COMPLETED AS PER DESIGN

ALTERATIONS IN RED

NAME (PRINT)

SIGNATURE

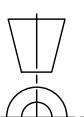
DATE

FOR CONSTRUCTION

- NOTES:
- ALL EXTERNAL FEEDERS AND TAILS MUST BE BIRD PROOFED AS PER EXTERNAL PLANT POLICY 003615.
 - FOR SITE SPECIFIC NOTES REFER TO SHEETS S0 & S0-1.
 - ALL DIMENSIONS ARE IN MILLIMETRES UNLESS OTHERWISE STATED.
 - FOR EME SIGNS NOTED AS ~~#X~~ REFER TO 005486 DOCUMENTS FOR DETAILS.
 - ORIGINAL FOOTING IS MEASURED IS A 4.78m SQUARE CONCRETE PAD. ALL OTHER DIMENSIONS ARE ASSUMED AS PER DRAWING CF7107 SHEET 1
 - ~~#4~~ PROPOSED SIGN TO REPLACE EXISTING SIGN ~~#6~~ AND TO BE SECURED 1.5m AGL TO STRUCTURE USING STAINLESS STEEL STRAPS.
 - ~~#13~~ EXISTING EME SIGN SECURED TO COMPOUND GATE STAMPED WITH RFNSA #4553002.

DO NOT SCALE

F



RFNSA #4553002.

PROPERTY DESCRIPTION

LOT 561 ON FTY1884
PARISH OF BRIBIE
COUNTY OF CANNING

SITE STRUCTURE CO-ORDINATES (GDA94)
GPS READING ACCURACY: ±10.0m
CENTRE OF POLE

LATITUDE

-26.79036° (GDA94)

LONGITUDE

153.03424° (GDA94)


Downer
Relationships creating success

TO BE READ IN CONJUNCTION WITH SHEETS S1-1, S3 & S3-1.

ORDER	DRWN	CHKD	AMENDMENT	EXAM	APPD	DATE	ISS
4012980.11	KS	MN	FOR CONSTRUCTION - 72578789W001SSMC - GWN AMENDMENT	RG	CT	23.02.15	8
36403417	NAB	NAB	GWN - AS BUILT SP30050163	JW	BA	23.10.15	9
4014294.01	KP	SK	AS BUILT - 30060201W0066VPL - LTE700/LTE1800	RG	MK	16.12.16	10
4017926.01	VG	RS	AS BUILT - 30088472W0163VPL - NR850/LTE2600/NR3500	KSK	DG	15.09.21	11
4018352.01	RK	RS	AS BUILT - 30093515W0018SSNC - LTE2600/ NR850/NR3500	KSK	DG	15.02.22	12
4021101.01	JM	JL	FOR CONSTRUCTION-SP80005638W0002DOWN-L700/850/1800/2100/2600/NR850/2600/3600	BS	PW	11.08.25	13

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MOBILE NETWORK SITE 57936

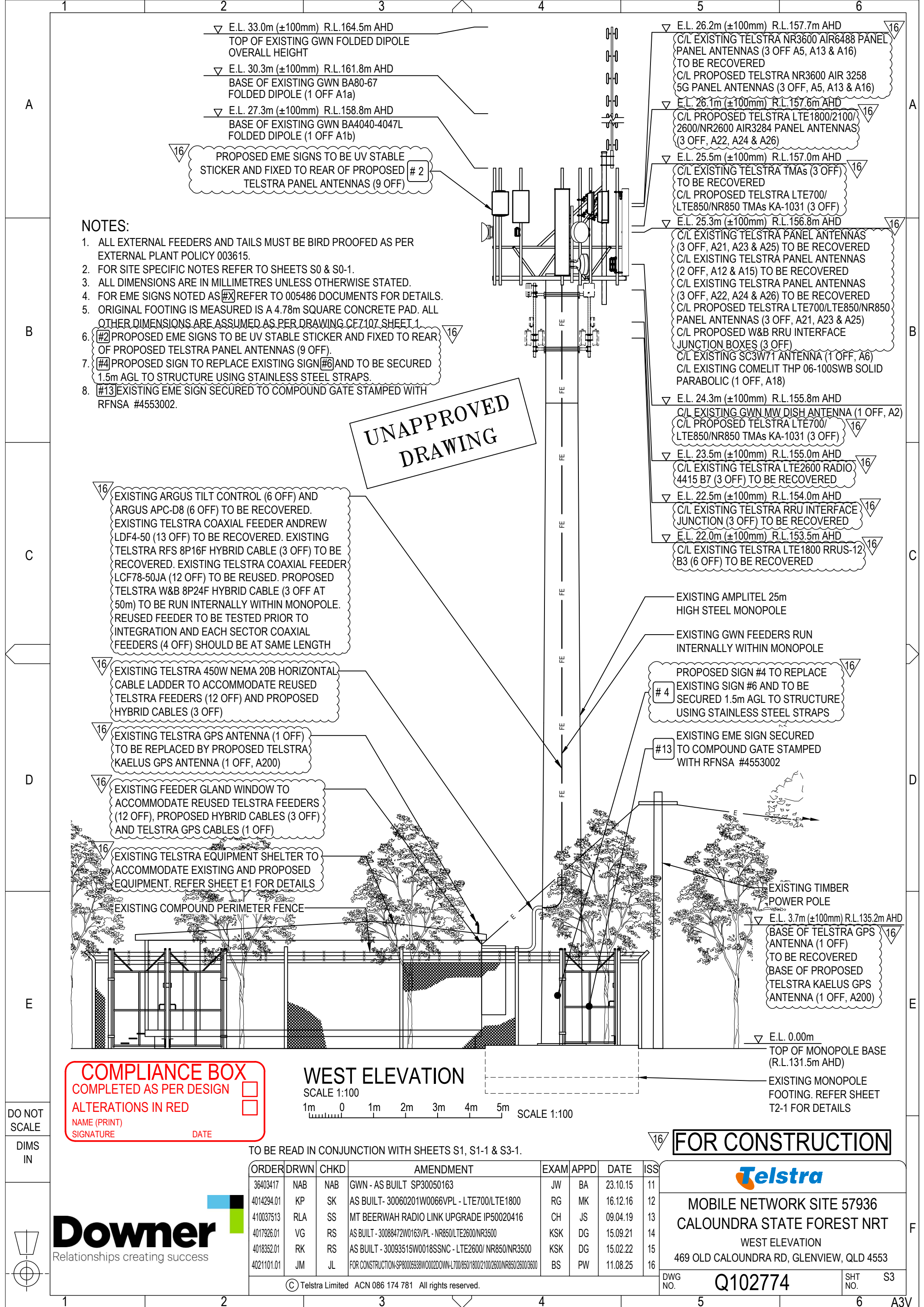
CALOUNDRA STATE FOREST NRT

SITE LAYOUT AND ACCESS

469 OLD CALOUNDRA RD, GLENVIEW, QLD 4553

DWG NO. Q102774

SHT NO. S1



NOTES:

- 1. ALL EXTERNAL FEEDERS AND TAILS MUST BE BIRD PROOFED AS PER EXTERNAL PLANT POLICY 003615.
- 2. FOR SITE SPECIFIC NOTES REFER TO SHEETS S0 & S0-1.
- 3. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS OTHERWISE STATED.
- 4. FOR EME SIGNS NOTED AS #X REFER TO 005486 DOCUMENTS FOR DETAILS.
- 5. ORIGINAL FOOTING IS MEASURED IS A 4.78m SQUARE CONCRETE PAD. ALL OTHER DIMENSIONS ARE ASSUMED AS PER DRAWING CE7107 SHEET 1
- 6. #2 PROPOSED EME SIGNS TO BE UV STABLE STICKER AND FIXED TO REAR OF PROPOSED TELSTRA PANEL ANTENNAS (9 OFF).
- 7. #4 PROPOSED SIGN TO REPLACE EXISTING SIGN #6 AND TO BE SECURED 1.5m AGL TO STRUCTURE USING STAINLESS STEEL STRAPS.
- 8. #13 EXISTING EME SIGN SECURED TO COMPOUND GATE STAMPED WITH RFNSA #4553002.

UNAPPROVED
DRAWING

COMPLIANCE BOX

COMPLETED AS PER DESIGN

ALTERATIONS IN RED

NAME (PRINT)

SIGNATURE

DATE

WEST ELEVATION

SCALE 1:100

1m 0 1m 2m 3m 4m 5m SCALE 1:100

TO BE READ IN CONJUNCTION WITH SHEETS S1, S1-1 & S3-1.

ORDER	DRWN	CHKD	AMENDMENT	EXAM	APPD	DATE	ISS
36403417	NAB	NAB	GWN - AS BUILT SP30050163	JW	BA	23.10.15	11
4014294.01	KP	SK	AS BUILT - 30060201W0066VPL - LTE700/LTE1800	RG	MK	16.12.16	12
410037513	RLA	SS	MT BEERWAH RADIO LINK UPGRADE IP50020416	CH	JS	09.04.19	13
4017926.01	VG	RS	AS BUILT - 30088472W0163VPL - NR850/LTE2600/NR3500	KSK	DG	15.09.21	14
4018352.01	RK	RS	AS BUILT - 30093515W0018SSNC - LTE2600/ NR850/NR3500	KSK	DG	15.02.22	15
4021101.01	JM	JL	FOR CONSTRUCTION-SP80005938W0002DOWN-L700/850/1800/2100/2600/NR850/2600/3600	BS	PW	11.08.25	16

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FOR CONSTRUCTION



MOBILE NETWORK SITE 57936
CALOUNDRA STATE FOREST NRT
WEST ELEVATION
469 OLD CALOUNDRA RD, GLENVIEW, QLD 4553

DWG NO.

Q102774

SHT NO.

S3

1

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6

A

B

C

D

E

F

10

TELSTRA ANTENNA CONFIGURATION TABLE

ANTENNA No	ANTENNA TYPE & SIZE H x W x D	ANTENNA ACTION REQUIRED	ANTENNA HEIGHT C/L A.G.L.	ANTENNA BEARING (x°T)	SECTOR NO. & TECHNOLOGY
A5 (OLD)	ERICSSON AIR6488 PANEL	REMOVE	26.2m	170°	-
A12 (OLD)	ARGUS CPX310R PANEL	REMOVE	25.3m	290°	-
A13 (OLD)	ERICSSON AIR6488 PANEL	REMOVE	26.2m	290°	-
A15 (OLD)	ARGUS CPX310R PANEL	REMOVE	25.3m	50°	-
A16 (OLD)	ERICSSON AIR6488 PANEL	REMOVE	26.2m	50°	-
A21 (OLD)	ARGUS RVVPX310B2 PANEL	REMOVE	25.3m	170°	-
A22 (OLD)	ARGUS CNNPX310R-6P	REMOVE	25.3m	170°	-
A23 (OLD)	ARGUS RVVPX310.11B-T2H	REMOVE	25.3m	290°	-
A24 (OLD)	ARGUS CNNPX310R-6P	REMOVE	25.3m	290°	-
A25 (OLD)	ARGUS RVVPX310B2 PANEL	REMOVE	25.3m	50°	-
A26 (OLD)	ARGUS CNNPX310R-6P	REMOVE	25.3m	50°	-
A200 (OLD)	ROSENBERGER GPS-36-N-SA	REMOVE	3.7m (BASE OF GPS)	0°	-
A5	ERICSSON AIR 3258 793 x 408 x 235mm	INSTALL	26.2m	170°	S2: NR3600 S2: NR3600
A13	ERICSSON AIR 3258 793 x 408 x 235mm	INSTALL	26.2m	290°	S3: NR3600 S3: NR3600
A16	ERICSSON AIR 3258 793 x 408 x 235mm	INSTALL	26.2m	50°	S1: NR3600 S1: NR3600
A21	KAELUS F6RHEU01 PANEL 2705 x 470 x 178mm	INSTALL	25.3m	170°	S2: LTE700/LTE850/NR850 S2: LTE700/LTE850/NR850 S2: LTE700/LTE850/NR850 S2: LTE700/LTE850/NR850 S2: SPARE S2: SPARE S2: SPARE S2: SPARE
A22	ERICSSON AIR 3284 1000 x 505 x 339mm	INSTALL	26.1m	170°	S2: LTE1800/LTE2100/LTE2600/NR2600 S2: LTE1800/LTE2100/LTE2600/NR2600 S2: LTE1800/LTE2100/LTE2600/NR2600 S2: LTE1800/LTE2100/LTE2600/NR2600
A23	KAELUS F6RHEU01 PANEL 2705 x 470 x 178mm	INSTALL	25.3m	290°	S3: LTE700/LTE850/NR850 S3: LTE700/LTE850/NR850 S3: LTE700/LTE850/NR850 S3: LTE700/LTE850/NR850 S3: SPARE S3: SPARE S3: SPARE S3: SPARE
A24	ERICSSON AIR 3284 1000 x 505 x 339mm	INSTALL	26.1m	290°	S3: LTE1800/LTE2100/LTE2600/NR2600 S3: LTE1800/LTE2100/LTE2600/NR2600 S3: LTE1800/LTE2100/LTE2600/NR2600 S3: LTE1800/LTE2100/LTE2600/NR2600
A25	KAELUS F6RHEU01 PANEL 2705 x 470 x 178mm	INSTALL	25.3m	50°	S1: LTE700/LTE850/NR850 S1: LTE700/LTE850/NR850 S1: LTE700/LTE850/NR850 S1: LTE700/LTE850/NR850 S1: SPARE S1: SPARE S1: SPARE S1: SPARE
A26	ERICSSON AIR 3284 1000 x 505 x 339mm	INSTALL	26.1m	50°	S1: LTE1800/LTE2100/LTE2600/NR2600 S1: LTE1800/LTE2100/LTE2600/NR2600 S1: LTE1800/LTE2100/LTE2600/NR2600 S1: LTE1800/LTE2100/LTE2600/NR2600
A200	KAELUS KA-7005-1110 DUAL BAND GNSS GPS	INSTALL	3.7m (BASE OF GPS)	0°	-

MDT=0 FOR ALL PANEL ANTENNAS

UNAPPROVED
DRAWING

COMPLIANCE BOX

COMPLETED AS PER DESIGN

ALTERATIONS IN RED

NAME (PRINT)

SIGNATURE

DATE

10

FOR CONSTRUCTION

DO NOT SCALE

DIMS IN

TO BE READ IN CONJUNCTION WITH SHEETS S1, S1-1 & S3.

ORDER	DRWN	CHKD	AMENDMENT	EXAM	APPD	DATE	ISS
4012980.11	KS	MN	FOR CONSTRUCTION - 72578789W0001SSMC - GWN AMENDMENT	RG	CT	23.02.15	5
36403417	NAB	NAB	GWN - AS BUILT SP30050163	JW	BA	23.10.15	6
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4021101.01	JM	JL	FOR CONSTRUCTION-SP80005938W0002DOWN-L700/850/1800/2100/2600/NR850/2600/3600	BS	PW	11.08.25	10

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Telstra

MOBILE NETWORK SITE 57936

CALOUNDRA STATE FOREST NRT

ANTENNA CONFIGURATION TABLE

469 OLD CALOUNDRA RD, GLENVIEW, QLD 4553

DWG NO.

Q102774

SHT NO.

S3-1

Downer

Relationships creating success

1

2

3

4

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A3V