Response to Community Submissions

Proposed Telecommunications Facility (30m monopole and equipment compound)
Lathlain Park - 42 Bishopsgate Street (34 Goddard Street), Lathlain WA 6100

WAPC ref	32-50045-10
Town ref	5.2025.73.1
To	Kelly Vilkson, Acting Coordinator Urban Planning, Town of Victoria Park
Prepared by	Ben McDonnell, BMM Group Pty Ltd, on behalf of Amplitel Pty Ltd
Date	20 October 2026
Purpose	Applicant's response to submissions under Part 13 of Local Planning Policy 37 - Community Consultation on Planning Proposals, for attachment to the Council report

1. Introduction and planning context

Amplitel acknowledges the matters raised through community consultation. The Town advised on 16 October 2026 that 80 online written submissions had been received, comprising 77 objections, one submission in support and two submissions that neither supported nor objected. The Town also advised that it was still cross-checking online and emailed responses for duplication. This response therefore addresses the seven objection themes identified by the Town, rather than the number of individual submissions raising each issue.

The proposal should be considered as a replacement and consolidation project, rather than as an isolated new telecommunications use. Mobile services have operated from the Town-owned grandstand within Lathlain Park under leases granted in 2004 and 2007. The Town has terminated the rooftop telecommunications leases in connection with the planned replacement of the structurally deficient grandstand. The proposed facility relocates those services within the same precinct and provides one shared structure capable of accommodating multiple carriers.

This response should be read together with the Amended Planning Report (Final v3, 6 October 2026), the Response to Request for Further Information - Site Selection and Alternatives Analysis (6 October 2026), and the Environmental EME Report (12 August 2026). Those documents contain the detailed planning, technical, environmental and site-selection evidence supporting the application.

2. Key matters relevant to consideration of the submissions

- Replacement of an established service. Telecommunications services have operated from the existing grandstand for more than 20 years; the proposal relocates those services because the existing host is being removed.
- Location developed with the Town. Candidate A was developed through site meetings and discussions with Town property and open-space officers. Council subsequently resolved, by Resolution 296/2024, to authorise a lease over approximately 85 m², conditional on development approval.
- Single shared structure. The proposal consolidates carriers on one monopole. The Town's 2022 Lathlain Zone 1 Business Case considered a single shared monopole pathway in preference to separate structures.
- Alternative sites and designs have been tested. Existing telecommunications facilities, the West Coast Eagles building, other buildings and structures, four ground-based candidates within Lathlain Park, off-

reserve options and design alternatives have been assessed. Candidate A remains the preferred option when RF performance, land availability, constructability, visual amenity, sensitive uses and environmental effects are considered together.

- Mitigation is embedded in the proposal. The compound has been moved against the fence line and away from the pedestrian path; a slim monopole and circular headframe are proposed; recessive finishes and landscaping are proposed; habitat trees outside the compound are retained; and construction management and arboricultural controls can be imposed by condition.

3. Response to objection themes

3.1 Visual amenity - scale, height, design and views

Concern raised: The 30m structure would be visually prominent from nearby residences and the public realm, including the skate park and basketball court, and its scale and design would adversely affect local amenity.

Response: The applicant accepts that the upper part of the monopole will be visible from some viewpoints. Visibility, however, is not the same as an unacceptable visual impact. The relevant planning task is to minimise visual effects while still providing infrastructure capable of meeting its service objective. The proposal has been refined on that basis.

- The proposed antenna centreline of 30m is the minimum height identified as necessary to clear the mature tree canopy and existing and future buildings and to meet the required coverage objectives for the carriers. Reducing the height would reduce coverage and capacity and could generate a need for additional facilities elsewhere in Lathlain.
- Candidate A is approximately 55m from the nearest dwelling. Ground candidates B and C were assessed at approximately 40m from the nearest dwelling and have materially less screening. Candidate D is also more exposed to Roberts Road and adjoining housing.
- Some submissions refer to residential properties within 40m of the structure. The separation distances in the Amended Planning Report are measured from the proposed monopole to the nearest dwellings (approximately 55m). Distances measured to property boundaries will be shorter.
- The lower portion of the proposed facility is screened by existing mature vegetation. The monopole is deliberately slim, uses a circular rather than triangular headframe and is proposed in a non-reflective grey finish. These measures reduce the apparent bulk and contrast of the infrastructure.
- The compound is positioned against the existing southern fence and adjoining car park, away from the pedestrian path. Black PVC-coated chain-link fencing, Rainbow Stone gravel, shrub replanting and a recessive equipment-shelter colour have been agreed in principle with the Town.
- The facility does not occupy or restrict access to the skate park or basketball facilities. The Amended Planning Report includes photomontages (Figures 10–13) and shadow diagrams (Appendix C) addressing the visual relationship of the facility with its surroundings. The photomontages show the pole partly absorbed into the tree canopy backdrop.

On balance, the visual effect is considered low to moderate and has been reduced as far as practicable through the selected location, separation from residences, existing vegetation, monopole form, headframe design and finishes. A materially lower or differently located structure would not achieve the same combination of service performance and amenity mitigation.

3.2 Consistency with the Parks and Recreation reserve and loss of open space

Concern raised: The fenced compound would remove approximately 81m² of public open space, be inconsistent with the Parks and Recreation reservation and diminish enjoyment of nearby active and passive recreation areas.

Response: The proposal does not introduce telecommunications infrastructure to Lathlain Park for the first time. It relocates an established telecommunications function from the grandstand to a ground-based facility within the same reserve because the existing host is to be removed.

- Under clause 30 of the MRS, the WAPC must have regard to the purpose of the reserve, the orderly and proper planning of the locality and the preservation of amenity. The facility supports the reserve's sport and

recreation function by providing reliable mobile coverage for players, spectators and event organisers, including emergency (000) calls, medical alert devices, and EFTPOS and ticketing on match days, as well as West Coast Eagles and Perth Football Club operations.

- The Town, as landowner and manager of the reserve, identified the relocation as necessary to deliver its precinct redevelopment, and Council has resolved to lease this land for the purpose (Resolution 296/2024).
- The fenced compound is 81 m² within an approximately 85 m² lease area. Against the approximately 8.4 ha reserve, this represents about 0.1% of the site area.
- The location is within Zone 2 - Community Activities of the Lathlain Park Management Plan, in a landscaped strip between the car park and boundary fence. It is not on either oval or a formal sporting surface and is not identified in the supporting material as land used for organised sport.
- At the Town's request the compound was moved against the fence line and away from the pedestrian path. The proposal therefore maintains pedestrian circulation and access to adjoining recreation facilities.
- The Management Plan objective for Zone 2 is the provision of passive recreational space with a high level of safe, universal pedestrian access. The proposal's small footprint and edge location allow that function to continue.
- Consolidating carriers on one shared structure minimises the number of telecommunications structures and the associated land take within the precinct.

Accordingly, while a small area of reserve land would be occupied, the proposal does not displace an oval, court, path or formal recreation area and does not prevent the balance of Zone 2 from continuing to perform its identified community and passive recreation role.

3.3 Tree removal, urban canopy and fauna habitat

Concern raised: Removal of mature trees would reduce canopy cover and could affect habitat for local birds, including Red-tailed Black-Cockatoos.

Response: The vegetation impact has been minimised through the siting and layout of the compound, as follows.

- Four trees are proposed to be removed within the compound footprint and three trees require trimming for crane and elevated-work-platform access.
- The arborist material appended to the Amended Planning Report identifies the trees proposed for removal as planted and not endemic to the region. The subject land is not identified as ecologically significant in the PlanWA mapping referenced in the report.
- The two cockatoo habitat trees identified during the site inspection with Town officers are outside the compound and are to be retained. The compound was also reconfigured to avoid the root zone of the tree immediately to its south.
- Amplitel has offered a contribution of up to $3,000 towards replacement planting undertaken by the Town, with species selection to be agreed having regard to access and operational requirements.
- The applicant would accept conditions requiring a landscaping/replacement planting plan and protection of retained or trimmed trees under the supervision of a suitably qualified arborist.

The vegetation impact is therefore confined to the footprint and construction access requirements, with the identified habitat trees retained and compensatory planting available as a mitigation measure.

3.4 Alternative locations and future redevelopment

Concern raised: Other locations should be used, including the West Coast Eagles building or grounds, future Perth Football Club facilities or grandstand, nearby commercial buildings, or another location within the broader Lathlain Park area. Submissions also queried whether the facility could be relocated as part of future precinct redevelopment.

Response: The alternatives raised through consultation substantially overlap with the alternatives already examined through the site-selection process and the subsequent RFI response. The assessment considered co-location first, then existing buildings and structures, and then a new freestanding structure, having regard to the relevant telecommunications planning framework, technical requirements, landowner availability, constructability and amenity.

Alternative	Assessment outcome
Existing telecommunications facilities	Existing sites at 358 Albany Highway, 99 Shepperton Road and 232 Orrong Road were assessed as too low or too remote to deliver the required Lathlain service objective.
West Coast Eagles building rooftop	The roof is approximately 6-14m above ground and is below the required 30m antenna centreline. The assessment identifies RF limitations, a complex long-span roof, significant structural modification, equipment and access constraints, and visual effects on the building. A tall roof mast would effectively reintroduce a prominent pole above the building.
Existing grandstand	Not a long-term option because the telecommunications leases were terminated and the grandstand is planned for replacement following identified structural defects.
Future Perth Football Club grandstand	Not currently available. The approved three-level form is below the required antenna height without a substantial roof mast. The Town had also assessed the monopole and future grandstand as co-existing elements during earlier planning.
Other ground sites in Lathlain Park	Candidates B and C are closer to residences and less screened. Candidate D is more visually exposed adjoining Roberts Road. Candidate A provides the stronger combined outcome for separation, screening and avoidance of active sporting areas.
Oval light towers	A combined lighting/telecommunications structure was assessed as requiring a taller structure (40-45m) at the edge of a playing field, with reduced screening and additional operational/maintenance constraints.
Nearby low-rise buildings and community sites	The nearby shops, Scout Hall, school and dwellings were assessed as too low. The school and Lathlain Place/Rayment Park area also raise community-sensitivity considerations.
Off-reserve options	Rail, other open-space, commercial and verge locations were reviewed at a high level and did not provide a superior combination of RF performance, land availability and amenity.

Candidate A was also not selected as a temporary location awaiting a future redevelopment outcome. The RFI material records that the Town's Strategic Projects Manager participated in negotiating the location having regard to future precinct plans, and that in August 2024 the Town requested EME-zone information to check the relationship between the proposed monopole and construction of a future grandstand. The future Perth Football Club grandstand is not yet funded or built, and waiting for it would leave the precinct without a permanent facility for an indefinite period. The applicant is prepared to accept a condition requiring removal and reinstatement if the facility ceases to be used for telecommunications purposes.

3.5 Alternative height, design and technology

Concern raised: A lower structure, a different design, or a combination of smaller facilities should be used instead of a 30m monopole.

Response: The design alternatives raised in submissions were considered in Section 5.6 of the Site Selection and Alternatives Analysis, as summarised below.

- Lower monopole: The supporting technical assessment identifies 30m as the minimum antenna centreline required to clear the tree canopy and buildings and meet the service objective. A lower structure would produce a smaller and more obstructed coverage footprint and could require additional facilities.
- Two or more lower poles: This would increase the number of structures in the locality rather than consolidate carrier equipment on one shared facility.
- Small cells: The planning material identifies the requirement as a macro-cell coverage objective. Smaller infrastructure can supplement capacity in localised areas but has not been identified as a substitute capable of meeting the same broad coverage objective from a single location.
- Lattice tower: Rejected because its greater structural bulk would increase visual impact. A slim monopole was selected as the less visually intrusive freestanding form.
- Colour and form: A recessive non-reflective grey pole, circular headframe, screened compound and landscape treatment are proposed to reduce contrast and bulk.

The evidence therefore supports the proposed 30m shared monopole as the least-intrusive design that still meets the identified network requirement, rather than simply the tallest available design.

3.6 EME and health

Concern raised: EME from the proposed facility could cause adverse health effects for nearby residents and users of the reserve.

Response: Amplitel and the carriers place a high priority on EME safety and rely on the advice of national and international expert bodies, principally the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), on base stations and health.

It is the responsibility of these expert authorities to continually review the science on EME and to protect public safety.

All mobile base stations, including the proposed facility, must comply with the Australian safety standard, Radiation Protection Series S-1: Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz (the Safety Standard).

The Safety Standard is set by ARPANSA, is based on the guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP), and compliance is regulated by the Australian Communications and Media Authority (ACMA).

The Safety Standard is conservative and includes substantial safety margins. It protects all people, including children, from radiofrequency EME in the range 100 kHz to 300 GHz, which includes the frequencies used for 5G.

EME assessment is governed by the applicable Australian safety standard and the facility is required to comply with that standard. The Environmental EME Report was prepared using the ARPANSA methodology. The report predicts the following maximum EME levels as percentages of the public exposure limit.

Area of interest	Maximum EME level (% of public exposure limit)
Environmental EME level (1.5m above ground, out to 500m from the site)	6.28%
Lathlain Primary School	1.98%
Lathlain Oval	1.61%
Lathlain Primary School Early Childhood	0.52%

Source: Environmental EME Report, 42 Bishopsgate Street, Lathlain (RFNSA No. 6100001)

The calculated site maximum of 6.28%, which includes the cumulative contribution of all operators' equipment, is well below the applicable public exposure limit. The antennas are mounted at approximately 30m and are not directly accessible to the public. Compliance with the standard is an ongoing operational requirement regulated through the national telecommunications framework. As noted in the EME Report, ARPANSA's assessment is that there is no credible health risk from exposure to the low-level EME associated with telecommunications below the limits set in the Safety Standard.

Also, regulations to protect the public from EME exposure from telecommunications facilities do not set any distance requirements between the facility and other land uses such as residences, schools or hospitals.

Furthermore, generalised buffer distances are based on the mistaken assumption that increasing the distance between a base station and nearby residents reduces exposure to EME. In practice, both mobile phones and base stations are designed to operate at the lowest power levels necessary to maintain a quality connection. Base stations continually adjust their output based on factors such as network demand and the distance of nearby devices.

Positioning a base station further away from the community it is intended to serve can require the equipment (and individual mobile handsets) to increase power to maintain connectivity. This can result in higher overall EME levels in the area, contrary to what buffer-zone approaches aim to achieve.

3.7 Property values

Concern raised: The proposal may reduce the value of surrounding residential properties.

Response: Effects on property values are generally treated as falling outside the realm of planning. The Department of Planning, Lands and Heritage's Development Application Exercise of Discretion Guidelines note that submissions raising substantive planning matters should generally be given greater weight than those raising matters such as impacts on property values. The amenity matters that may underlie this concern (visual impact, open space and EME) are addressed in Sections 3.1, 3.2 and 3.6.

To operate effectively, mobile phone base stations must be located close to the communities they serve. The presence of mobile and wireless telecommunications services is generally seen as an essential service. Mobile services enhance modern living providing connectivity, assisting work flexibility and assisting in emergency situations. In fact, it is a desirable asset when new businesses and potential home buyers are looking to obtain new premises.

Property valuation is a complex issue, with fluctuations in price being subject to several factors. Many of these are subjective, and may be as diverse as aspect, views, condition of the property, local amenity and access to services, including high quality communications. Since the mid-1990s, thousands of telecommunication facilities have been installed throughout Australian metropolitan and regional areas. During this period, property values have continued to increase, showing no clear signs of deterioration because of the location of communications facilities. Amplitel is not aware of any credible evidence that directly links the siting of a telecommunications facility to a decrease in property prices.

Sites must be located where people live, work and play to provide the best mobile phone coverage and to allow devices and the network to operate most efficiently. It is expected that the installation of the replacement facility will maintain access to mobile services, continue to deliver a positive benefit to the wider community and maintain and improve quality of life through the advancements of connectivity.

4. Applicant commitments and suitable conditions

To reinforce the mitigation already incorporated into the proposal, Amplitel remains willing to accept reasonable and relevant conditions dealing with the following matters:

- compound fencing, Rainbow Stone ground treatment, garden edging and equipment-shelter colour consistent with the outcomes agreed with the Town;
- a landscaping and replacement-planting plan to the Town's satisfaction before works commence, supported by Amplitel's contribution of up to $3,000 towards replacement planting;
- protection of retained habitat trees and trees requiring trimming, with works undertaken under appropriate arboricultural supervision;
- a construction management plan addressing vehicle and crane access, timing, temporary exclusion areas, adjoining recreation facilities and event days;
- confirmation of non-reflective external finishes;
- the structure being available for co-location by other carriers;
- decommissioning and removal of the existing grandstand telecommunications equipment once the replacement facility is operational; and

- removal of the proposed facility and reinstatement of the land if it ceases to be used for telecommunications purposes.

5. Conclusion

The community submissions raise matters concerning visual amenity, open space, trees and fauna, alternatives, facility height and design, EME and perceived effects on nearby properties. Those matters have been considered against the detailed site-selection work, the amended planning assessment, the EME assessment and the design and mitigation commitments developed with the Town.

The evidence supports Candidate A as the preferred overall planning outcome because it provides the required replacement service from one shared structure, is separated from residences more than the other viable on-reserve ground candidates, benefits from mature vegetation screening, avoids active sporting surfaces and formal pedestrian paths, and can be constructed with a small compound footprint and specific landscape, arboricultural and construction controls. The alternative buildings, structures and locations examined do not provide a better combined outcome when technical feasibility, land availability, amenity and environmental considerations are assessed together.

Amplitel therefore respectfully requests that the Town take this response into account in preparing its recommendation to the Western Australian Planning Commission and support the application, subject to reasonable and relevant conditions addressing the mitigation and commitments outlined above.

Yours faithfully,



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