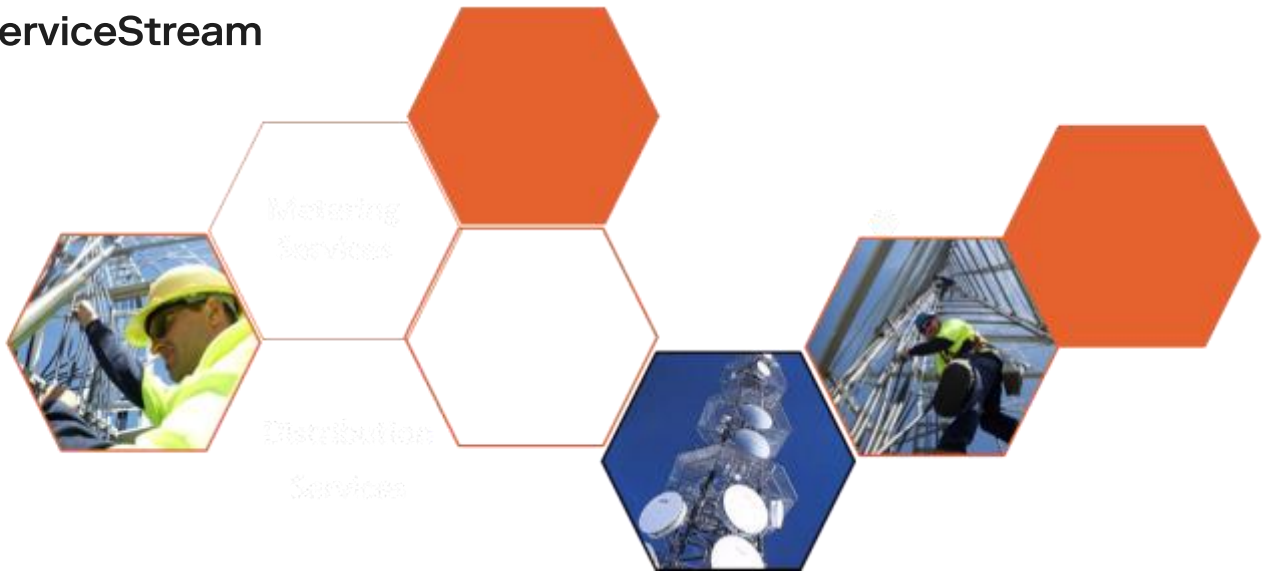




**ServiceStream**



## Statement of Environmental Effects

**Proposed Telstra Mobile Telecommunications Base Station Adjacent  
to: – 4891B Sturt Highway, Paringi NSW 2738 (Lot 28/DP836099)**



**Our Reference: Kerribee Station**

**Prepared by: Service Stream – Mobile Communications**

**On behalf of: Telstra Corporation Limited Pty Ltd**



## Document Control Record

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| <b>Document Description</b> | SEE: Proposed Telstra Mobile Telecommunications Base Station At: 4891B Sturt Highway, Paringi NSW 2738 (Lot 28/DP836099) |                  |                  |
| <b>Site No.</b>             | VT22368.01                                                                                                               | <b>Site Name</b> | Kerribee Station |

|                    |                 |                 |             |
|--------------------|-----------------|-----------------|-------------|
|                    | <b>Name</b>     | <b>Signed</b>   | <b>Date</b> |
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*This report has been prepared as a supporting document to the Development Application. The report relies upon data, surveys, measurements and results taken at or under particular times and conditions specified herein. Any findings and conclusions or recommendations only apply to the aforementioned circumstances. Service Stream does not accept any responsibility for the use of this report by any parties other than Mid-Western Regional Council, without its prior written permission.*



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# 1 Introduction

## 1.1 Executive Summary

This Planning Report has been prepared by Service Stream – Mobile Communications (SSMC) on behalf of Telstra Corporation Pty Ltd (Telstra). The proposed site is located at 4891B Sturt Highway, Paringi NSW 2738 (Lot 28/DP836099) ('the site').

Telstra currently have mobile equipment on an existing Sydney Water guyed mast structure, however upgrading the Telstra facility is problematic due to tenure issues. Telstra are therefore proposing to build a new structure approximately 150m east of the Sydney Water structure. It is a requirement of Sydney Water that the existing structure remain in place to accommodate their own equipment. Once the new Telstra facility is operational, redundant Telstra equipment on the Sydney Water mast and the Telstra shelter will be decommissioned and removed.

The proposed development will meet the requirement for Telstra as a licensed carrier to provide continued adequate coverage to their customers in the locality.

In order to meet radio frequency objectives at this location, the base station will require a 65m guyed mast with six panel antennas and ancillary equipment to be installed on a triangular headframe. Radio Equipment will be housed in a new equipment shelter which is to be located at the base of the new structure.

This Statement of Environmental Effects has been prepared in accordance with relevant statutory and regulatory requirements. Potential impacts associated with this development are expected to be minimal due to the land already being used for mobile telecommunications infrastructure, including an existing Optus lattice tower.

In this instance, the socio-economic benefits to the local community outweigh the perceived impact of such development and include:

- Providing better coverage and services to existing customers.
- Meeting the community's increasing demand for quality and reliable mobile phone service.
- Providing infrastructure to meet the community's social, business and educational needs.
- Improving the reliability of Telstra incoming and outgoing services to Emergency services organizations and road users to assist in the event of an emergency.
- Increasing the level of competition in the Telecommunications market, resulting in competitive prices, economic efficiency and increased consumer choice.

## 1.2 Purpose of the Development Application

This Planning Report has been prepared by Service Stream Mobile Communications (SSMC) on behalf of Telstra Corporation Pty Limited (Telstra).

This Statement of Environmental Effects (SEE) accompanies an Application for Development Approval for the installation of a new mobile telecommunications facility at Paringi. The proposed base station will provide coverage to the local community, local and home businesses, emergency services and travellers (both business and personal) to the area who require mobile and wireless broadband services.

The facility forms an integral part of Telstra's mobile network in regional NSW and enables Telstra to enhance and further expand services to customers in the region.

For more information on mobile base station and technology please see enclosed information pack.

## 1.3 Telstra – Company Profile



Telstra is Australia's leading telecommunications and information services company, with one of the best-known brands in the country. Telstra offers a full range of services and compete in all telecommunications markets throughout Australia, providing more than 7.2 million Australian fixed line and 16.9 million mobile services.

Some of Telstra's main activities include the provision of:

- basic access services to most homes and businesses in Australia;
- local and long-distance telephone calls in Australia and international calls to and from Australia;
- mobile telecommunications services;
- broadband access and content;
- a comprehensive range of data and Internet services (including through Telstra BigPond®, Australia's leading Internet service provider).

One of Telstra's major strengths in providing integrated telecommunications services is its vast geographical coverage through both its fixed and mobile network infrastructure. This network and systems infrastructure underpins the carriage of the majority of Australia's domestic and international voice and data telephony traffic.

<http://www.telstra.com.au>

## 2 The Proposed Facility

## 2.1 Site Location and Surrounds

The proposal involves the installation of new mobile telecommunications infrastructure located at 4891B Sturt Highway, Paringi NSW 2738 (Lot 28/DP836099) ('the site').

The subject site is located within a large farming property, approximately 25km southeast of Mildura, on the southern side of the Sturt Highway and approximately 1km north of the Murray River, NSW/Victorian border. The surrounding land is utilised for agriculture with interspersed vegetation throughout the area.

The Lambert Island Nature Conservation Reserve is located further to the south.



Figure 1: Aerial view of the proposed Telstra site. The existing Optus tower and Sydney Water guyed mast are also shown. Source: Google Earth, 23/2/22

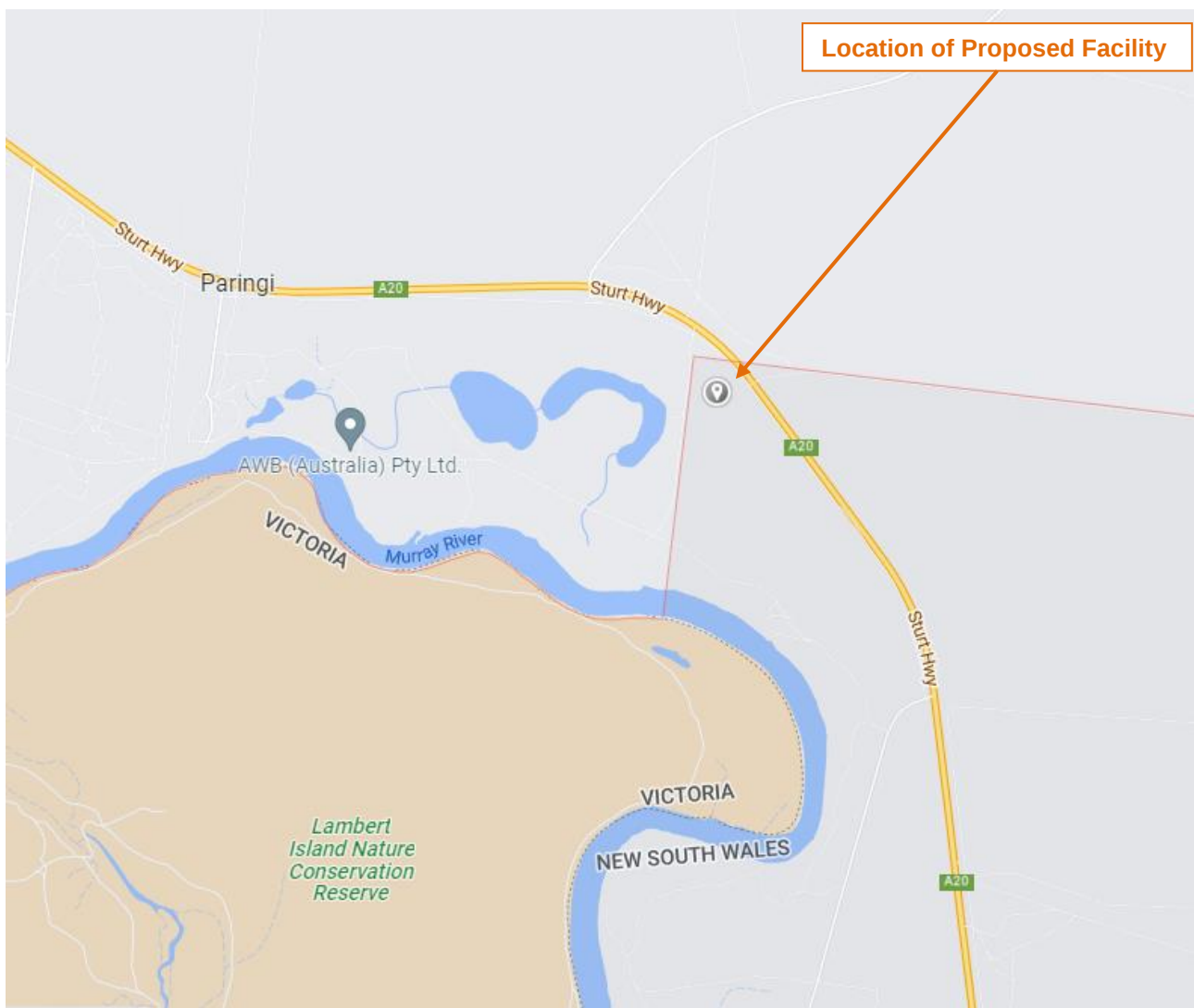


Figure 2: Aerial map of the proposed location

The subject site is zoned RU1 – Primary Production.

The proposed facility is to be located approximately 90m southeast of an Optus tower and 150m southeast of a Sydney Water guyed mast which currently accommodates Telstra antennas.

The surrounding area is predominantly rural.

The site is situated in the Wentworth Shire Council area. The proposed site for the telecommunications facility is located on a cleared grassy area however there are scattered trees throughout the wider area and lining the Murray River. The site and surrounding area is generally flat.

The site is entered off the Sturt Highway to the north of the site and internal roads/tracks provide established access.



Figure 3: Zoning Map – RU1 – Primary Production. Source: NSW Mapping 2015



Figure 4: Proposed Telstra site location shown. Optus Lattice Tower (left) and Sydney Water guyed mast (right) in the background. Source: Servicestream, 3/2/22



Figure 5: Proposed Telstra site location and existing site access shown. Source: Servicestream 3/2/22

## 2.2 Description of the Proposal

The proposal seeks development consent to install a mobile telecommunications facility near the existing Sydney Water guyed mast and Optus tower. Telstra currently has mobile antennas on the Sydney Water guyed mast, however upgrading this facility is problematic due to tenure issues. As such, it was determined that a new site next to the existing site would be required. Co-locating Telstra mobile equipment onto the Optus tower did not achieve the coverage requirements necessary and was therefore deemed not feasible.

In order to meet radio frequency objectives at this location, the base station will require a 65m guyed mast with six (6) panel antennas and ancillary equipment to be installed on a triangular headframe. Radio Equipment will be housed in a new equipment shelter which will be located at the base of the new guyed mast. The proposed design represents the best solution available to Telstra incorporating the minimum height necessary to achieve the coverage objectives. An extensive design process has been undertaken to ensure that the height of the proposed facility is the minimum required to ensure the network coverage objectives are achieved.

### Guyed Mast

The proposed facility will be a 65 metre guyed mast with antennas attached onto a triangular headframe.

### Antennas

Six (6) panel antennas (dimensioned 2533mm H x 353mm W x 209mm D) will be attached to the guyed mast on a triangular headframe. Ancillary equipment will be also installed on the headframe.

### Equipment

A new equipment shelter (dimensioned 3000mm L x 2850mm W x 2950mm H) will be installed near the base of the new guyed mast. The equipment shelter will house the necessary electronic equipment required to operate the base station.



## Access

Construction access to the site will be via a private access driveway off the Sturt Highway. Operational access will be via the same route. The site will be able to be accessed by any vehicle.

In unusual situations where work or maintenance is required on the upper portion of the guyed mast (e.g. antenna modifications) a cherry picker will be used. Mobile phone base stations are unmanned, of low maintenance and mostly remotely operated. As such, operational visits to the site will be minimal and approximately only 4-6 times per year for maintenance purposes. Access to the antennas and the top of the monopole will be via a cherry picker.

## Power and Fibre

It is proposed to obtain power supply to the site via an underground route from the nearest source. The exact power source and route will be confirmed during the detailed design stage of the proposal (Refer to **Appendix B** for site design and layout plan).

## Redundant Equipment

Once the new facility is operational, Telstra will remove antennas and associated equipment from the Sydney Water guyed mast, along with the redundant equipment shelter.

## 2.3 Construction of the Facility

Construction activities will involve the following:

- Excavation of the guyed mast foundation and anchors;
- Delivery and pouring of concrete on site for the mast, anchors and shelter foundations;
- Installation of conduit within trenches, followed by installation of cables within conduits;
- Delivery of the mast sections to site;
- Separate installation of each mast section;
- Attachment of antenna mount, mounts, cables, cable ladder to shelter and antennas;
- Installation of the earth grid and connection of the base station to the electrical supply and optical fibre cables;
- Installation and commissioning of the base station radio equipment.

The daily construction process will require approximately three to four workers on site and an average of four to five vehicle movements per day. The general construction timeframe, weather dependent, is approximately 5 weeks.

## 2.4 Need for proposal

This proposed facility is required to improve Telstra mobile and wireless broadband coverage in Paringi and the surrounding area.

There is an existing Sydney Water guyed mast (RFNSA No. 2738002) on an adjacent block, at Lot 16 Plan 836009, Sturt Highway, Paringi NSW 2738, which currently accommodates Telstra mobile equipment. In order for Telstra to be able to upgrade its base station capacity to meet growing network demand, additional antennas and equipment need to be installed.

Upgrading Telstra's equipment on the Sydney Water mast is limited and problematic due to tenure issues.



Co-locating Telstra equipment onto the nearby Optus tower (RFNSA No. 2738003) at Maynard Station, Sturt Highway, Monack, did not achieve the coverage objectives for the area.

As upgrading or co-locating onto existing infrastructure is not feasible, Telstra propose to remove their existing mobile equipment from the Sydney Water mast and build a new guyed mast nearby.

Telecommunications infrastructure has to be suitably sited within a location to allow the facility to provide optimum radio frequency to meet network objectives. This includes designing the facility to provide sufficient height to avoid physical obstructions such as tall buildings, trees and hills and positioning the facility an appropriate distance away from existing telecommunications equipment.

The facility will improve existing in-building mobile phone coverage, increase capacity and improve network performance to the town of Paringi. The proposal will form an integral part of the overall Telstra network and will contribute to the economic viability of the area, which will substantially benefit businesses and private users of the network.

The growth in new technologies and improved devices, such as smart phones which require a lot of data usage are putting a high amount of demand on the current network leading to a decrease in the depth of coverage that is currently being provided. The proposed site in Paringi is required to provide this depth of coverage to support high speed data rates that customers expect whilst utilising Data cards and their Smart phones on the Telstra network.

The proposal will provide high quality mobile telecommunications services to the local area, including excellent reception with low interference and a reduction in unexpected call dropouts. The proposal will ensure that there continues to be a healthy competitive market within the telecommunication industry, resulting in competitive practices and prices and improve quality mobile and broadband services.

## 2.5 Consequences for not proceeding

The consequences of the proposal not proceeding would be:

- Increasingly poor-quality telecommunications services in Paringi, including poor reception, interference and unexpected call dropouts;
- An erosion in the quality of telecommunication services in the wider local areas;
- Lack of improvement in most up-to-date mobile network services including mobile broadband in the areas; and



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## 3 Site Selection and Justification

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As part of Telstra's site acquisition procedure, a comprehensive site selection process has been undertaken in order to find an appropriate location to relocate the facility in Paringi. This included looking for 'colocation' opportunities, in accordance with Chapter 4 Part 3 Clause 4.13 of the Telecommunications Code of Practice 2018, as well as low impact solutions and new greenfield sites.

The specific constraints of this project, including the topography, built environment and the coverage target area resulted in limited site options. However, the selection process involved a number of stages and entailed identifying potential candidates by assessing each under the following considerations:

### Planning

- In accordance with the relevant Acts and Environmental Planning Instruments (EPI);
- Acceptability of the proposal to Wentworth Shire Council and the local community;
- Location in relation to sensitive land uses such as schools, childcare centres, hospitals and nursing homes which in some occasions is difficult to avoid
- Visual aspect and amenity;
- Compliance with the EME standards mandated by the Australian Communications and Media Authority (ACMA); and
- Opportunities to collocate facilities where possible.
- Low impact solutions

### Property

- Availability of suitable land and likelihood of the owner entering into a tenure agreement and providing access during construction and operation.

### Engineering:

- Feasibility of construction and availability of infrastructure such as access and power.

### Radio frequency coverage and objectives:

- Ability to be linked to the existing Telstra network and meet the radio frequency coverage objectives for the area.

As upgrading or co-locating on existing structures was deemed unfeasible, a new facility proximate to the existing Telstra facility's location, was deemed on balance, to be the appropriate solution to achieve radio frequency coverage objectives for the Paringi area and Telstra's wider mobile network.

The site selected offers established road and track access, and existing fibre and power are located nearby. The area is cleared of vegetation and the works will not impact existing vegetation. Furthermore, there is a willing landowner so that tenure may be secured.



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## 4 Consultation

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### 4.1 Council

Pre-lodgment discussions were conducted with Council and no major issues were raised as part of those discussions, however the site remains subject to assessment of this application.

### 4.2 Community

Telstra recognises the community interest associated with the development of telecommunications sites and public notification will be undertaken by Council as part of the Development Application process (if required).

### 4.3 Other Stakeholders

No other interested or affected parties have been identified



## 5 Environmental Assessment

Federal and State legislation and guidelines have been created to guide the development of Telecommunications Infrastructure in Australia.

### 5.1 Commonwealth Legislation

#### 5.1.1 Telecommunications Act 1997

The *Telecommunications Act 1997* (TA) came into operation in July 1997. The TA sets up a framework for regulating the actions of telecommunications carriers and service providers. Telstra is a licensed carrier under the TA.

Schedule 3 – Carriers' powers and immunities, of the TA, specifies 'authorised activities' that a carrier is empowered to carry out without approval under NSW legislation. These activities include the inspection of land, and the installation and maintenance of certain facilities.

A Carrier's power to install a facility is contingent upon:

*"the facility being a low-impact facility (as defined by the Telecommunications (Low-Impact Facilities) Determination 1997 (as amended))".*

In this case, the proposal involves the installation of a new guyed mast structure, and therefore does not constitute a low-impact facility under the Telecommunications (Low-Impact Facilities) Determination 2018 and Amendment 2021. As the proposed facility does not meet the criteria mentioned above, Telstra is therefore not empowered to undertake the proposed works without approval under NSW State legislation and must obtain development consent from the consent authority.

The consent authority in this instance is **Wentworth Shire Council**.

#### 5.1.2 Telecommunications Code of Practice 2018

Under the *Telecommunications Act 1997* the Government established the Telecommunications Code of Practice 2018, which sets out the conditions under which a carrier must operate. Section 2.11 of the Telecommunications Code of Practice 2018 sets out the design, planning and installation requirements for the carriers to ensure the installation of facilities is in accordance with industry 'best practice'. This is required to:

*"... minimise the potential degradation of the environment and the visual amenity associated with the facilities."*  
[Section 2.11(3)]

Best practice also involves the carrier complying with any relevant industry code or standard that is registered by the Australian Communications Authority (ACA) under Part 6 of the Act.

The siting and design of this proposal has taken place in accordance with Section 3 (Planning and Siting) of the Australian Standard, Siting of Radiocommunications Facilities (AS 3516.2). The proposed site and design was selected after extensive search and analysis of potential candidates and the site was considered to provide an optimal environmental and network solution. The proposed design achieves minimal visual impact while meeting the technical coverage requirements for the site.

On balance it is considered that the proposed site is an appropriate planning solution in accordance with site selection criteria expressed in the Telecommunications Act 1997, and the relevant legislative and regulatory requirements of federal, state and local authorities.

#### 5.1.3 Deployment Code

The 'Mobile Phone Base Station Deployment Code' Communications Alliance Ltd Industry Code (C564:2020) is a code developed by a working committee with representatives from carriers, various levels of government, an industry group and a community action group. The Code came into effect on the 1st July, 2012. The Code is designed to:

- Allow the community and councils to have greater participation in decisions made by carriers when deploying mobile phone base stations; and



- Provide greater transparency to local community and councils when a carrier is planning, selecting sites for, installing and operating Mobile Phone Radiocommunications Infrastructure.

The carriers' activities are published on the internet-based Radio Frequency National Site Archive (RFNSA) as well as information relevant to each site such as EME Reports.

In the site selection and design stages of this proposal, the precautionary approach outlined in the Deployment Code has been considered (see Table 1 below). No consultation external to that undertaken in the Development Application process is required under the Code.

**Table 1: Application of the Industry Code C564:2020 precautionary approach to mobile phone Radiocommunications infrastructure placement and design**

| Subclause                                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Clause 4.1 Site Selection</b>                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 4.1.1. <i>Clause 4.1 applies if a Carrier proposes to select a new site for the deployment of Mobile Phone Radiocommunications Infrastructure.</i>                                                                                                                   | Clause 4.1 Applies to this proposal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4.1.2. <i>A Carrier must have written procedures for site selection for Mobile Phone Radiocommunications Infrastructure in relation to factors contained in clause 4.1.5 and make them available to the public on request.</i>                                       | Written procedures have been developed and will be made available to members of the public on request                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4.1.3. <i>For new sites, once the preferred option has been selected, the Carrier must make available to the public on request the summary of the sites considered and the reasons for the selection of the preferred option.</i>                                    | The site selection summary will be made available to any member of the public should they request it                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4.1.4. <i>The Carrier must comply with its procedures.</i>                                                                                                                                                                                                           | All procedures have been complied with                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4.1.5. <i>The procedures must require, as a minimum, that for each site the Carrier have regard to:</i>                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| (a) <i>the reasonable service objectives of the Carrier including:</i><br>(i) <i>the area the planned service must cover;</i><br>(ii) <i>power levels needed to provide quality of service;</i><br>(iii) <i>the amount of usage the planned service must handle;</i> | (i) The primary requirement for installing the base station at the proposed location is to maintain service in the Paringi area.<br>(ii) The power levels of Telstra's facilities are set as low as possible to meet the required service objective, the facilities also automate their power requirements in response to the demand and number of connections at any one time therefore maximising power efficiency.<br>(iii) The proposed base station ensures that long-term, consistent, high-quality voice and mobile data services are provided in Connells Point. |
| (b) <i>minimisation of EMR exposure to the public;</i>                                                                                                                                                                                                               | (b) The proposed design and location of the facility means its antennas are excluded from direct public access. Telstra facilities power levels are set as low as possible to meet the                                                                                                                                                                                                                                                                                                                                                                                   |



| Subclause                                                                                                                                                                                                                                                   | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                             | required service objective, the facilities also automate their power requirements in response to the demand and number of connections at any one time therefore maximising power efficiency and minimising EME emissions. Even at full power (see <b>Section 6.10</b> ) exposure limits to the public are well below the ARPANSA EME Standard (see <b>Appendix C</b> )                                                                                                                                                                 |
| (c) <i>the likelihood of an area being a community sensitive location. (Examples of sites which sometimes have been considered to be sensitive include residential areas, childcare centres, schools, aged care centres, hospitals and regional icons);</i> | <p>(c) The proposed facility is not located within proximity to residential housing or any community sensitive uses.</p> <p>Care has been taken to minimise the visual impact of the proposal and locate it in a rural area. Ancillary equipment has also been positioned to reduce the overall visual bulk of the installation.</p> <p>In light of this, a location may still be considered sensitive however Telstra wishes to highlight that out of the limited options in the general area, the proposal is the most suitable.</p> |
| (d) <i>the objective of avoiding community sensitive locations;</i>                                                                                                                                                                                         | (d) In some cases, community sensitive locations are unavoidable however care is taken to mitigate the community's concerns.                                                                                                                                                                                                                                                                                                                                                                                                           |
| (e) <i>relevant state and local government telecommunications planning policies;</i>                                                                                                                                                                        | (e) All relevant state and local government planning policies have been considered regarding the proposal i.e. <i>Environmental Planning and Assessment Act 1979, State Environmental Planning Policy (Infrastructure) 2021</i> , NSW Telecommunications Facilities Guideline including Broadband 2010, Kogarah Local Environmental Plan 2012 – see <b>Section 5.3</b>                                                                                                                                                                 |
| (f) <i>the outcomes of consultation processes with Councils and Interested and Affected Parties as set out in clause 6.7;</i>                                                                                                                               | (f) The outcomes of the consultation processes with the identified affected parties have been taken into consideration and addressed as per clause 6.7                                                                                                                                                                                                                                                                                                                                                                                 |
| (g) <i>the heritage significance (built, cultural and natural);</i>                                                                                                                                                                                         | (g) The proposed area is not a listed Heritage Item nor does it contain items of Aboriginal heritage – see <b>Section 6.4</b>                                                                                                                                                                                                                                                                                                                                                                                                          |
| (h) <i>the physical characteristics of the locality including elevation and terrain;</i>                                                                                                                                                                    | (h) Paringi features undulating topography due to its location adjoining the Sturt Highway and north of the Murray River.                                                                                                                                                                                                                                                                                                                                                                                                              |
| (i) <i>the availability of land and public utilities;</i>                                                                                                                                                                                                   | (i) The proposal is located on a large privately owned property where there is already existing telecommunications infrastructure nearby.                                                                                                                                                                                                                                                                                                                                                                                              |



| Subclause                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (j) <i>the availability of transmission to connect the Mobile Phone Radiocommunications Infrastructure with the rest of the network, e.g. line of sight for microwave transmission;</i>                                         | (j) The facility will utilise existing underground fibre and power to obtain connectivity to the surrounding Telstra Network.                                                                                                     |
| (k) <i>the radiofrequency interference the planned service may cause to other services;</i>                                                                                                                                     | (k) The proposed location ensures that there will be no interference with any existing services.                                                                                                                                  |
| (l) <i>the radiofrequency interference the planned service could experience at that location from other services or sources of radio emissions;</i>                                                                             | (l) The proposed location ensures that there will be no interference with any existing services.                                                                                                                                  |
| (m) <i>any obligations and opportunities to co-locate facilities; and</i>                                                                                                                                                       | (m) Colocation options were either not viable or too far away to meet the objectives of this proposal.                                                                                                                            |
| (n) <i>cost factors.</i>                                                                                                                                                                                                        | (n) The cost factors are within the normal scope of a standard facility of similar design, location and scale.                                                                                                                    |
| <b>Clause 4.2 Mobile Phone Radiocommunications Infrastructure Design</b>                                                                                                                                                        |                                                                                                                                                                                                                                   |
| Subclause                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                          |
| 4.2.1. <i>Clause 4.2 applies if a Carrier proposes to design Mobile Phone Radiocommunications Infrastructure.</i>                                                                                                               | Clause 4.2 applies to this proposal.                                                                                                                                                                                              |
| 4.2.2. <i>A Carrier must have written procedures for designing Mobile Phone Radiocommunications Infrastructure.</i>                                                                                                             | Written procedures have been developed by Telstra.                                                                                                                                                                                |
| 4.2.3. <i>With the objective of minimising unnecessary or incidental RF emissions and exposure, the procedures must require that, in designing Mobile Phone Radiocommunications Infrastructure, the Carrier have regard to:</i> | (a) The base station is proposed to provide coverage in Paringi and surrounding area. The base station will ensure capacity is not negatively affected and that better quality services to customers are retained for the future. |
| (a) <i>the reason for the installation of the infrastructure, considering – coverage, capacity and quality;</i>                                                                                                                 | (b) The antennas have been positioned to minimise the obstruction of radio signals as required.                                                                                                                                   |
| (b) <i>the positioning of antennas to minimise obstruction of radio signals;</i>                                                                                                                                                | (c) The antennas will be located at the top of a 65m guyed mast with required EME signage.                                                                                                                                        |
| (c) <i>the objective of restricting access to areas where RF exposure may exceed limits of the EMR standard;</i>                                                                                                                | (d) (i)-(ii) The site requires a macro cell with directional antennas to meet its coverage objectives.                                                                                                                            |
| (d) <i>the type and features of the infrastructure that are required to meet service needs including:</i>                                                                                                                       | (e) Telstra facilities automate power in response to the demand and number of connections.                                                                                                                                        |
| (i) <i>the need for macro, micro or pico cells; and</i>                                                                                                                                                                         | (f) The cost of achieving the objective is reasonable.                                                                                                                                                                            |
| (ii) <i>the need for directional or non-directional antennas.</i>                                                                                                                                                               |                                                                                                                                                                                                                                   |
| (e) <i>the objective of minimising power whilst meeting service objectives; and</i>                                                                                                                                             |                                                                                                                                                                                                                                   |
| (f) <i>whether the costs of achieving this objective are reasonable.</i>                                                                                                                                                        |                                                                                                                                                                                                                                   |



| Subclause                                                                                                                                                                                                                                                               | Response                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| 4.2.4. <i>A Carrier must comply with those procedures.</i>                                                                                                                                                                                                              | All procedures have been complied with.                                                  |
| 4.2.5. <i>Site EMR assessments for Mobile Phone Radiocommunication Infrastructure must be made in accordance with the ARPANSA prediction methodology and report format (see Appendix A – Additional Design Information and Appendix B – ARPANSA EME Report Format).</i> | The supplied EME report ( <b>Appendix C</b> ) meets the ARPANSA EME Report requirements. |
| 4.2.6. <i>The ACMA may request a copy of the site EMR estimate, and the Carrier must provide the estimate to the ACMA within two weeks of the request being made.</i>                                                                                                   | Any requests will be complied with within two weeks of the request being made.           |

Telstra has applied the Precautionary Approach in the Selection and Design of the proposed site in accordance with Sections 4.1 and 4.2 of this Code.

## 5.2 State Legislation

### 5.2.1 Environmental Planning Regime

The *Environmental Planning and Assessment Act 1979* (the Act) is the primary statute regulating the environmental planning and development in NSW.

Telecommunications facilities are not Designated Development under Schedule 3 of the Environmental Planning & Assessment Regulation 1994, and consequently do not require the preparation of an Environmental Impact Statement.

However, under the provisions of Part 4 of the EP&A Act, a DA and accompanying SEE must be lodged with the consent authority.

Section 4.15(1) of the EP&A Act outlines the issues that are to be addressed in this SEE. Section 4.15 is a reference tool designed to assist planning authorities and developers in the preparation and assessment of DAs and specifies exactly which issues must be considered by the consent authority when assessing the application.

Compliance with the requirements of 4.15(1) is discussed in this Chapter and the potential impacts of the proposal on the environment, natural and human is discussed in Chapter 6 of this SEE.

### 5.2.2 State Environmental Planning Policy (Infrastructure) 2021

The SEPP (Infrastructure 2021) provides a consistent planning regime for infrastructure and the provision of services across NSW, along with providing for consultation with relevant public authorities during the assessment process. Division 21 of the SEPP applies to telecommunications and other communication facilities, establishing the approval regimes for telecommunications in NSW. Division 21 classifies certain telecommunications development that is permitted without consent, with consent and exempt from local environmental approvals. Reference is made to clause 115 (1), which states:

*“Development for the purposes of telecommunications facilities, other than development in clause 114, may be carried out by any person with consent on any land.”*

Telecommunications facility is defined to mean:

*“(a) any part of the infrastructure of a telecommunications network, or*

*(b) any line, cable, optical fibre, equipment, apparatus, tower, mast, antenna, dish, tunnel, duct, hole, pit, pole or other structure in connection with a telecommunications network.”*

Clause 116 and 116A allow for greater flexibility in installing new towers and facilities. Under this amendment, new telecommunications towers required to deliver broadband or mobile phone access in certain rural or industrial zones would be allowed as complying development subject to amenity and safety issues such as

height limits and separation from residential areas. This proposal does not meet the requirements of exempt or complying development under this SEPP, therefore a DA is required.

Clause 115 has the effect of overriding any of Council's Local Environmental Plans and zonings where telecommunications facilities are prohibited and allows for a development application for a telecommunications facility to be assessed on its merits.

In this case, the subject land is zoned RU1 – Primary Production, and telecommunications facilities in this zone are prohibited under the provisions of the Wentworth Local Environment Plan 2011 – however pursuant to the ISEPP, assessment of this application is requested from Council.

### 5.2.3 NSW Telecommunications Facilities Guideline including Broadband 2010

The NSW Telecommunications Facilities Guideline including Broadband has been issued by the Director General. Section 2.2 of the Guideline must be taken into consideration. Table 2 below assesses the proposal's consistency with these principles.

**Table 2: Responses to principles 1- 4 Section 2.2 of the NSW Telecommunications Facilities Guideline including Broadband**

| Principal                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Principle 1: A telecommunications facility is to be designed and sited to minimize visual impact.</b>                                                                                                                                                                                                                                           |                                                                                                                                                                                             |
| (a) <i>As far as practical, a telecommunications facility that is to be mounted on an existing building or structure should be integrated with the design and appearance of the building or structure.</i>                                                                                                                                         | (a) The proposal is to replace existing Telstra equipment on a Sydney Water guyed mast onto a new Telstra guyed mast. Some visual change is expected from the addition of a new guyed mast. |
| (b) <i>The visual impact of telecommunications facilities should be minimised, visual clutter is to be reduced particularly on tops of buildings, and their physical dimensions (including support mounts) should be sympathetic to the scale and height of the building to which it is to be attached, and sympathetic to adjacent buildings.</i> | (b) The proposal is to replace existing Telstra equipment on a Sydney Water guyed mast onto a new Telstra guyed mast. Some visual change is expected from the addition of a new guyed mast. |
| (c) <i>Where telecommunications facilities protrude from a building or structure and are predominantly backgrounded against the sky, the facility and their support mounts should be either the same as the prevailing colour of the host building or structure, or a neutral colour such as grey should be used.</i>                              | (c) The facility can be painted however it would be suitable to have it match the appearance of the existing facilities in the area.                                                        |
| (d) <i>Ancillary facilities associated with the telecommunications facility should be screened or housed, using the same colour as the prevailing background to reduce its visibility, including the use of existing vegetation where available, or new landscaping where possible and practical.</i>                                              | (d) Due to the angle of views from surrounding roads, the ancillary equipment will not be overly visible and therefore do not need to be screened or shrouded.                              |
| (e) <i>A telecommunications facility should be located and designed to respond appropriately to its rural landscape setting.</i>                                                                                                                                                                                                                   | (e) The facility has been designed to fit in with the rural setting                                                                                                                         |
| (f) <i>A telecommunications facility located on, or adjacent to, a State or local heritage item or within a heritage conservation area, should be sited and designed with external colours, finishes and scale sympathetic to those of the heritage item or conservation area.</i>                                                                 | (f) The site is not located on or adjacent to a Local or State heritage item or within a heritage area                                                                                      |
| (g) <i>A telecommunications facility should be located so as to minimise or avoid the obstruction of a significant view of a heritage item or place, a landmark, a streetscape, vista to minimise or avoid the obstruction of a significant view of a</i>                                                                                          | (g) The facility is located in a cleared area next to an existing Optus lattice tower and Sydney Water guyed mast.                                                                          |



| Principal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>(h) <i>The relevant local government authority must be consulted where the pruning, lopping, or removal of any tree or other vegetation would contravene a Tree Preservation Order applying to the land or where a permit or development consent is required.</i></p> <p>(i) <i>A telecommunications facility that is no longer required is to be removed and the site restored, to a condition that is similar to its condition before the facility was constructed.</i></p> <p>(j) <i>The siting and design of telecommunications facilities should be in accordance with any relevant Industry Design Guides</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>(h) No trees are to be removed as part of the proposal</p> <p>(i) This aspect could be implemented by a condition of consent if the Council considers it appropriate</p> <p>(j) The proposal will comply with the BCA and Deployment Code</p>                                                                                                                                                                                                                                                                                                                      |
| <b>Principle 2: Telecommunications facilities should be co-located wherever practical.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>(a) <i>Telecommunications lines are to be located, as far as practical, underground or within an existing underground conduit or duct.</i></p> <p>(b) <i>Overhead lines, antennas and ancillary Telecommunications facilities should, where practical, be co-located or attached to existing structures such as buildings, public utility structures, poles, towers or other radio communications equipment to minimise the proliferation of telecommunication facilities and unnecessary clutter.</i></p> <p>(c) <i>Towers may be extended for the purposes of co-location.</i></p> <p>(d) <i>The extension of an existing tower must be considered as a practical co-location solution prior to building new towers.</i></p> <p>(e) <i>If a facility is proposed not to be co-located the proponent must demonstrate that co-location is not practicable.</i></p> <p>(f) <i>If the development is for a co-location purpose, then any new telecommunications facility must be designed, installed and operated so that the resultant cumulative levels of radio frequency emissions of the co-located telecommunications facilities are within the maximum human exposure levels set out in the Radiation Protection Standard.</i></p> | <p>(a) The existing fibre and power network connections will be utilized for the replacement facility.</p> <p>(b) This proposal is to replace the existing Telstra facility on the Sydney Water guyed mast with a new telecommunications structure</p> <p>(c) N/A – proposal is for a new site</p> <p>(d) N/A – proposal is for a new site</p> <p>(e) N/A – the proposal is the removal of the existing Telstra equipment on the Sydney Water guyed mast and the construction of a new Telstra guyed mast.</p> <p>(f) N/A - the proposal is not for a co-location</p> |
| <b>Principle 3: Health Standards for exposure to radio emissions will be met</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>(a) <i>A telecommunications facility must be designed, installed and operated so that the maximum human</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>(a) The proposed facility will comply with the ARPANSA standard in relation to human exposure to EME. An EME report has been</p>                                                                                                                                                                                                                                                                                                                                                                                                                                   |



| Principal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><i>exposure levels to radiofrequency emissions comply with Radiation Protection Standard.</i></p> <p><i>(b) An EME Environmental Report shall be produced by the proponent of development to which the Mobile Phone Network Code applies in terms of design, siting of facilities and notifications. The Report is to be in the format required by the Australian Radiation Protection Nuclear Safety Agency (ARPANSA). It is to show the predicted levels of electromagnetic energy surrounding the development comply with the safety limits imposed by the Australian Communications and Media Authority and the Electromagnetic Radiation Standard and demonstrate compliance with the Mobile Phone Networks Code.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>completed and is found in Appendix C. This report demonstrates compliance with the ARPANSA standard for the operation of a radio communications facilities in Australia.</p> <p>(b) The proposal is for a mobile phone network and is subject to the requirements of the Industry Code C564:2020 Mobile Phone Base Station Deployment with regard to the design, siting and notification. An EME report has been completed as per the required ARPANSA format and is found in <b>Appendix C</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Principle 4: Minimise disturbance and risk, and maximise compliance</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <p><i>(a) The siting and height of any telecommunications facility must comply with any relevant site and height requirements specified by the Civil Aviation Regulations 1988 and the Airports (Protection of Airspace) Regulations 1996 of the Commonwealth. It must not penetrate any obstacle limitation surface shown on any relevant Obstacle Limitation Surface Plan that has been prepared by the operator of an aerodrome or airport operating within 30 kilometres of the proposed development and reported to the Civil Aviation Safety Authority Australia.</i></p> <p><i>(b) The telecommunications facility is not to cause adverse radio frequency interference with any airport, port or Commonwealth Defence navigational or communications equipment, including the Morundah Communication Facility, Riverina.</i></p> <p><i>(c) The telecommunications facility and ancillary facilities are to be carried out in accordance with the applicable specifications (if any) of the manufacturers for the installation of such equipment.</i></p> <p><i>(d) The telecommunications facility is not to affect the structural integrity of any building on which it is erected.</i></p> <p><i>(e) The telecommunications facility is to be erected wholly within the boundaries of a property where the landowner has agreed to the facility being located on the land.</i></p> <p><i>(f) The carrying out of construction of the telecommunications facilities must be in accordance with all relevant regulations of the Blue Book – 'Managing Urban Storm water: Soils and Construction' (Landcom 2004), or its replacement.</i></p> <p><i>(g) Obstruction or risks to pedestrians or vehicles caused by the location of the facility, construction activity or materials used in construction are to be mitigated.</i></p> <p><i>(h) Where practical, work is to be carried out during times that cause minimum disruption to adjoining properties and public access. Hours of work are to be restricted to between</i></p> | <p>(a) The facility is not within the Obstacle Limitation Surface of any airport.</p> <p>(b) Telstra will operate the radio facility within its own frequency spectrums and the facility will not cause any interference with other networks. All operating antennas will use the frequencies assigned to Telstra</p> <p>(c) The facility will be operated within the applicable specifications of the manufacturers</p> <p>(d) NA – the proposal is for a new guyed mast</p> <p>(e) The facility will be entirely within the lease area</p> <p>(f) The activities associated with construction and installation will be conducted in accordance with sediment controls, erosion controls, stormwater controls and other controls outlined in the Blue Book (refer <b>Section 6.6</b>)</p> <p>(g) Traffic management shall be employed during construction where necessary and any necessary permits from Council will be obtained</p> <p>(h) All work associated with the development and installation of the facility will be between 7.00am and 6.00pm, Mondays to Saturdays, with no work on Sundays and public holidays and/or as conditioned in the consent by Council</p> |



| Principal                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7.00am and 6.00pm, Mondays to Saturdays, with no work on Sundays and public holidays.                                                                                                                                                                                              | (i) Where required, a Traffic Management Plan will be developed and implemented during construction and installation activities. The procedures and mitigation measures in the plan will ensure compliance with Australian Standard AS1742.3-2002 Manual of uniform traffic control devices – Traffic control devices on roads. |
| (i) Traffic control measures are to be taken during construction in accordance with Australian Standard AS1742.3-2002 Manual of uniform traffic control devices – Traffic control devices on roads.                                                                                | (j) Any required trenching associated with the proposal will be covered or filled so that it is not open overnight.                                                                                                                                                                                                             |
| (j) Open trenching should be guarded in accordance with Australian Standard Section 93.080 – Road Engineering AS1165 – 1982 –Traffic hazard warning lamps.                                                                                                                         | (k) The site is already cleared                                                                                                                                                                                                                                                                                                 |
| (k) Disturbance to flora and fauna should be minimised and the land is to be restored to a condition that is similar to its condition before the work was carried out.                                                                                                             | (l) No vegetation is proposed to be removed therefore no threatened species will be impacted.                                                                                                                                                                                                                                   |
| (l) The likelihood of impacting on threatened species and communities should be identified in consultation with relevant state or local government authorities and disturbance to identified species and communities avoided wherever possible.                                    | (m) The site is not known to contain any items of indigenous significance. If any are found works will cease immediately.                                                                                                                                                                                                       |
| (m) The likelihood of harming an Aboriginal Place and / or Aboriginal object should be identified. Approvals from the Office of Environment & Heritage (OEH) must be obtained where impact is likely, or Aboriginal objects are found.                                             | (n) If disturbed, any street furniture, paving and walkways will be reinstated at the end of construction to at least the same condition they were in before work began                                                                                                                                                         |
| (n) Street furniture, paving or other existing facilities removed or damaged during construction should be reinstated (at the telecommunications carrier's expense) to at least the same condition as that which existed prior to the telecommunications facility being installed. |                                                                                                                                                                                                                                                                                                                                 |

## 5.3 Site Specific Legislation

### 5.3.1 Civil Aviation Safety Regulations 1998

Under the Civil Aviation Safety Regulations (CASR) 1998 – 139.355 an aerodrome operator is required to have established an Obstacle Limitation Surface (OLS), CASR – 139.350 requires an aerodrome operator to notify the Civil Aviation Safety Authority (CASA) of any obstacles that affects the airspace within the vicinity of the aerodrome.

Any proposed facility should not penetrate any relevant Obstacle Limitations Surface Plan that has been prepared by the operator of an aerodrome or airport operating within 30 kilometres of the proposed development and reported to the Civil Aviation Safety Authority.

The site is approximately 30km from the Mildura Airport and is not within the Obstacle Limitation Surface for that airport.

### 5.3.2 Local Environmental Plan (LEP)

The proposal is subject to land use controls under the Wentworth Local Environmental Plan 2011 (WLEP 2011). Wentworth Shire Council are the assessing authority and telecommunications facilities are permitted only with consent from Council.

Under the WLEP the proposed site is zoned RU1 – Primary Production.

Table 3 below sets out the objectives of the zone and an assessment of the proposal against these objectives.



Table 3: Assessment of proposal against objectives outlined in WLEP 2011 Land Use Table

| Objective                                                                                                                                                                           | Assessment                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.                                                                        | The Telstra facility will not impede on the primary use of the land. The proposed facility is a utility installation proposed for public benefit. Improved mobile coverage will support primary industry.                           |
| To encourage diversity in primary industry enterprises and systems appropriate for the area.                                                                                        | The Telstra facility will not impede on the primary use of the land. The proposed facility is a utility installation proposed for public benefit. Improved mobile coverage will support primary industry.                           |
| To minimise the fragmentation and alienation of resource lands.                                                                                                                     | The proposed facility will not unduly fragment the land for agricultural purposes due to the small development footprint.                                                                                                           |
| To minimise conflict between land uses within this zone and land uses within adjoining zones.                                                                                       | The proposed facility will not conflict between agricultural uses within the subject property and surrounding properties. In fact, improved mobile coverage to the area will support primary industry and production in the region. |
| To ensure the protection of both mixed dryland and irrigation agricultural land uses that together form the distinctive rural character of Wentworth.                               | The proposed facility will not conflict with mixed land uses. Improved mobile coverage will assist in protecting and supporting agriculture in the area.                                                                            |
| To ensure land is available for intensive plant agricultural activities.                                                                                                            | The proposed facility will require a small footprint which will not affect intensive plant agriculture on the property.                                                                                                             |
| To encourage diversity and promote employment opportunities related to primary industry enterprises, including those that require smaller holdings or are more intensive in nature. | The proposed facility will support diversity and employment opportunities in the region with the improvement of mobile coverage.                                                                                                    |

The proposed location is relatively unused, and no vegetation is to be cleared as part of the proposal. This development will not have any adverse impacts on the area, nor will it significantly affect the agricultural activities on the subject property. It is contended that improved mobile coverage will support the agricultural activities and production in this region.

In summary, the proposal meets the above objectives of the WLEP 2011 as it:

- Is technically feasible in this location and can achieve Telstra's network objectives for the area, resulting in the provision of improved telecommunications mobile services for local residents, businesses and users of traffic corridors.
- There are no ecological impacts. Environmental and ground disturbance impacts will be minimal, given the nature of the facility and its small footprint.
- The site is located within an RU1 – Primary Production zoning. The proposed facility is considered to be an appropriate land use within this zone, given it will not compromise the use of the property for its current purposes, while also providing significant benefit to the surrounding community.
- The replacement facility will be clustered with existing telecommunications infrastructure, where there is existing power and fibre, and established internal track accessibility.
- The site is not within an environmentally or culturally significant location and does not retain any heritage significance.



Telstra considers the proposal is consistent with these objectives and that the proposal will not have a detrimental impact upon the existing agricultural activities in the area.



## 6 Environmental Impact Assessment

Section 4.15 (1) of the EP&A Act requires that the following issues be considered when assessing the potential impact of a proposal:

- Visual Impact
- Social and economic impacts
- Flora and Fauna
- Heritage and Cultural Values
- Traffic Generation
- Soil Erosion and Landscaping provision
- Fire Prone Land
- Utility Services
- Noise
- Health and Safety
- Electrical Interference

### 6.1 Visual Impact

#### 6.1.1 Siting and Location

The proposed replacement facility will be adjacent to an existing Optus tower which has telecommunications equipment on it. The facility has been placed where there is access to existing power and fibre, adjacent to an existing track and clustered with existing infrastructure in an elevated location to optimise coverage requirements.

#### 6.1.2 Screening

Mobile base stations are relatively commonplace in today's landscape – thousands of mobile telecommunications facilities are in operation across Australia, over a variety of land uses and environments.

The lower portion of the proposed facility is screened from some aspects by established trees surrounding it. The upper portion of the mast will be visible as the effective operation of the base station requires the antennas to protrude above the surrounding vegetation and environment to meet the required levels of coverage.

The visual impacts of the proposal are determined to be minor due to the combination of the existing telecommunications infrastructure and existing mature vegetation on the property and wider area.

#### 6.1.3 Design

A precautionary approach to site design has been undertaken, Telstra have designed the site in order to reduce the overall visual obtrusiveness of the facility as far as possible whilst still meeting the coverage objectives, property, planning and engineering factors.

A triangular headframe is proposed in this occasion as it better accommodates the required equipment and reduces the overall height of the facility. Due to the number of antennas and ancillary equipment required, a more slimline guyed mast solution is proposed. The proposed equipment shelter will be located at the base of the mast.

In terms of the potential visual effects of the upper section of the proposed facility, it is important to note that the antennas need to have “line of sight” to the area that they are servicing (i.e. they need to be visible to the devices in the area they service) in order to function effectively – this is an inherent feature of cellular technology. Antennas cannot be placed below a topographical line, otherwise they will not be effective in providing the service to the user. It is a result of the technology that telecommunications facilities must be visible in order that they operate effectively.

While it is acknowledged that the upper section of the guyed mast and antennas would have a visual presence from the surrounding area, Telstra have designed the facility sympathetically thus minimising the visual impacts of the facility as much as possible whilst still achieving acceptable levels of coverage. Utilising a triangular headframe thereby minimising the mast height whilst still achieving acceptable coverage, will have a minimal impact on the surrounding area and will ensure the development is compatible with the expectations of the existing environment.

#### 6.1.4 Conclusion

From the discussion outlined above in 6.1, a number of conclusions have been made apparent concerning the proposed facility:

- The proposed facility has been designed and will be finished to have minimal visual impact on surrounding environment without undermining its viability to meet the capacity requirements of the Paringi area;
- Recessive colouring and a slimline mast design along with sympathetic antenna mounting technique lessens the potential visual impact;
- Views of the proposed facility are limited predominantly to within close proximity of the structure, from further away the proposal will be less visible due to the open weave design;
- The nature of the technology determines that telecommunications facilities require direct line of sight to the areas that they are serving, subsequently the antennas need to be visible to these areas in order that they provide effective service to the user;
- Telecommunication facilities are an accepted part of the peripheral landscape and an expected component within the built environment, much like essential services such as power lines and streetlights. With the expectation of having mobile phone coverage, there is an acceptance that facilities that provide the coverage will be visible. Over time these facilities become part of the background and are no longer noticed.

## 6.2 Socio – Economic Considerations

The proposed facility will enable excellent mobile network capability, which has now become expected, not only in metropolitan areas but also rural areas of Australia, to be provided.

These services allow communities to enjoy:

- Greater business accessibility and flexibility, especially for commuters, tradespeople and home-based business;
- Reliable personal safety – maintaining a mobile phone for critical communications and emergencies.
- As an industry telecommunications including mobile broadband has experienced exponential growth for many years now.

The proposed development will enable carriers to remain competitive and increase the choice of mobile telephone services available to consumers. Increased competition in the market brings direct economic benefits for individual consumers and the community as a whole. The development is consistent with the objectives of the Telecommunications Act 1997, namely:

- To promote “the efficiency and international competitiveness of the Australian telecommunications industry” (s.3(1)); and



- To ensure that telecommunications services “are supplied as efficiently and economically as practicable” (s.3(2)(a)(ii)).

Providing telecommunications services will allow home-based businesses to operate and grow their services. Diversify in both the services they offer, and how these services are marketed – the ability to reliably use social media for promotions is particularly beneficial for local businesses. A strengthened telecommunications network will also allow the local workforce to explore opportunities which were not previously possible, including home businesses and telecommuting.

Telstra are also responsive to public safety issues. High quality telecommunications services significantly benefit community safety by providing a vital ‘first response’ tool for emergency services. A strong mobile network is highly beneficial in an emergency situation, as well as more general public safety.

Telstra believe that it is in the public interest to provide a strong, resilient mobile network that, in turn, provides a high quality of service to local communities across Australia. Given the demand for the service, and the benefits noted above, we believe there is a strong justification for the telecommunications site at this location to be relocated.

The proposed facility will thus have a positive impact on the social and economic environment of the locality.

### 6.2.1 Effect on Surrounding House Values

Although property values are not an area of consideration by a consent authority, local residents sometimes ask questions on this topic. To date, there is no evidence of any negative impact telecommunications facilities have on property prices. With the many thousands of facilities located all around the country, if an impact was likely, it is expected it would be apparent by now. With the increase of wireless devices, including smart phones, tablets and mobile data devices the number of fixed line connections is decreasing, to ensure customers have access to high quality services in their home a telecommunications facility cannot be placed outside of the area requiring service.

## 6.3 Flora and Fauna

The proposed development will not have any adverse impact on any identified local flora or fauna of significance as the site is located on land that has previously been cleared. None of the surrounding vegetation is expected to be adversely affected by the proposed works and no trees are proposed to be removed as part of the works.

## 6.4 Heritage and Cultural Values

### 6.4.1 Indigenous Heritage

A search was conducted, and the site has not been identified as a site containing items or as an area of Aboriginal Significance.

If any items of indigenous heritage are encountered, works would cease immediately, and the relevant authorities would be contacted.

### 6.4.2 Non-indigenous Heritage

As part of Telstra’s site deployment process, a heritage and conservation register check is undertaken (including listings on the Register of the National Estate, NSW Heritage Register, Commonwealth and Territory Environmental Plans and database of the EPBC Act 1999).

A search of the following databases was undertaken to identify any items of non-indigenous heritage significance or conservation areas within the site or in the immediate vicinity of the site:

- Australian Heritage Database of the Australian Heritage Council;
- Australian Heritage Places Inventory;
- State Heritage Inventory of the NSW Heritage Office;
- Wentworth Shire Council Heritage Places list;



- EPBC Act – Protected Matters Search Tool

The site was not identified as having any cultural or environmental heritage. As such, the proposal is not expected to impact upon any items of non-indigenous heritage.

## 6.5 Traffic and Access – Parking and public transport

### 6.5.1 Construction Access

Construction access to the site is proposed via an existing driveway off the Sturt Highway. Traffic controllers will also assist vehicle movements of the crane and cherry picker to ensure minimal disturbance.

### 6.5.2 Operational Access

Mobile phone base stations are unmanned, of low maintenance and remotely operated. As such, operational visits to the site will be approximately 4 - 6 times per year for work or maintenance purposes. A short extension off the existing internal access track is required for the proposal.

There is sufficient parking on the site for future maintenance vehicles to access the area.

The equipment shelter will be securely locked and the proposal will not involve the introduction of any climbing devices on the mast, preventing public access to these areas.

In unusual situations where work or maintenance is required on the upper portion of the mast (e.g. antenna modifications) a cherry picker will be used. The proposal will have little impact upon the traffic network, or volumes. Any resulting impact on the local road system would be considered to be negligible.

## 6.6 Soil Erosion and Landscape Provision

The site is not known to be affected by any contamination. No signs of land contamination were observed during the site inspection. As such, it is unlikely that the proposed works would encounter any contaminated soils. However, any contaminated soils that are encountered during the proposed works will be managed in accordance with the relevant guidelines.

The nature and scale of the earthworks associated with the construction of the base station are limited to footing excavations and trenching work for the new conduits. Potential impacts related to the erosion of soil from the site compound would be addressed and mitigated with the following soil and water management measures undertaken during construction of the proposed facility:

- Diverting clean water away from the construction areas as necessary;
- Keeping ground disturbing activities to a minimum;
- Implementing appropriate sediment control measures as required, such as the installation of silt/sediment fences and/or sediment traps as necessary; and
- Works not occurring during periods of heavy rainfall.

All sediment and erosion control measures undertaken will be in accordance with the relevant requirements of the state legislation.

## 6.7 Bushfire Prone Land

The land is not identified as being bushfire prone under the WLEP 2011.

## 6.8 Utility Services

Further identification of utilities would be undertaken during the detailed design stage of the proposal, and any impacts assessed and necessary safeguards implemented as required.

The following mitigation measures would be implemented to ameliorate any impacts on existing infrastructure:



- A 'dial-before you dig' search would be undertaken during the detailed design stage;
- Prior to construction, all infrastructure and utilities would be identified;
- If required, prior to construction, relevant utilities and adjacent residents would be notified of any impending disruptions to services.

When operational, the site will be unmanned, and does not require utility services such as telephone, water and sewerage.

All services required for the ongoing operation of the base station are capable of being provided to the facility without impacting on the supply or reliability of these services to any existing consumers in the locality.

## 6.9 Noise and Vibration

Noisy construction activities would be mainly during the drilling/excavation of the foundation/footing for the monopole and trenching work for the conduits. It is also expected that there would be some noise generation from construction vehicles and machinery. These impacts are expected to be minor and short term in duration and works will only be undertaken during standard working hours.

The only noise generated during its operational stage is that from the air-conditioning unit servicing the equipment shelter. This air-conditioning unit is similar to those used for cooling of residential premises and will comply with the relevant noise emission guidelines.

It is not expected that construction works would create a noticeable vibration impact on the surrounding area.

## 6.10 Health and Safety

Mobile phone base stations emit electromagnetic energy (EME). It is mandatory that mobile network operators in Australia comply with current and future Australian Radiation protection and Nuclear Safety Agency (ARPANSA) standards for the operation of the proposed facility. The Australian Communications and Media Authority are the regulatory body for compliance with this standard. The current standard is the Radiation Protection Standard for Maximum Exposure Levels to Radiofrequency Fields – 3kHz to 300 GHz (RPS 3 - 2002). This standard maintains a significant safety margin to prevent adverse health effects.

In accordance with RPS 3, an estimate has been made of the maximum cumulative radiofrequency (RF) electromagnetic energy (EME) levels at ground level emitted from the proposed mobile base station. Estimates of RF EME levels are provided for 360° circular bands at 0-50, 50-100, 100-200, 200-300, 300-400 and 400-500m from the base of the antenna.

The report, provided at **Appendix C** of this SEE, concludes that the maximum cumulative EME level at 1.5m above ground level is estimated to be 0.13% of the ACMA mandated exposure limit.

The EME predictions in the Environmental EME Report provided are based on the facility operating at maximum power, these facilities are designed to be low powered and rarely operate at maximum power.

This involves:

- base station transmitters operating at maximum power (no automatic power reduction);
- simultaneous telephone calls on all channels; and
- an unobstructed line of sight view to the antennas.

Further to the above, emission levels produced by transmitters such as that proposed by this proposal are considered to be lower than other common types of transmitters.

Telstra acknowledges that despite this some people are genuinely concerned about the possible health effects of EME.

The World Health Organisation's current advice is:

*"Considering the very low exposure levels and research results collected to date, there is no convincing scientific evidence that the weak RF signals from base stations and wireless networks cause adverse health effects".*



## 6.11 Other Impacts During Construction

### 6.11.1 Air Quality

There is potential for dust generation during the excavation of the pole footings.

During construction all construction areas would be sprayed with water during dry and windy weather to suppress dust generation.

The compound site and surrounds would be appropriately restored after the completion of works to ensure no ongoing dust generation.

### 6.11.2 Waste Minimisation and Management

Due to the relatively minor nature of the works, the generation of waste resulting from construction of the proposed facility is expected to be minimal. The majority of the waste generated is expected to be excess spoil as a result of construction of foundations for the monopole.

Excess soil from the earthworks would be utilised on-site in association with landscaping of the facility, with the remainder disposed of at an approved waste disposal facility.

Other waste such as packaging material will be removed from site.

The operation of the facility will be mostly unmanned and will not generate any waste during the operational phase.

## 6.12 Cumulative Environmental Effects

The key perceived and potential environmental impacts for this proposed development have been identified as: health (perceived); visual impact (potential); and impacts during construction of the proposed facility. Each of these aspects has been considered individually and collectively from a cumulative impact perspective.

The strength of RF fields is greatest at its source and diminishes quickly with distance. Access near base station antennas is restricted where RF signals may exceed international exposure limits. Recent surveys have indicated that RF exposures from base stations and wireless technologies in publicly accessible areas (including schools and hospitals) are normally thousands of times below international standards.

The proposed base station will operate within and comply with the standard limits set by the ACMA.

This location already has telecommunications infrastructure, therefore little impact is expected on the existing skyline.

While it is acknowledged that the upper section of the mast and antennas would have a visual presence from the surrounding area, Telstra have designed the facility sympathetically thus minimising the visual impacts of the facility as much as possible whilst still achieving acceptable levels of coverage

Any environmental impacts during construction are expected to be temporary and mitigated through the implementation of appropriate work practices and management measures specified in this SEE. Consequently, the proposed development is not considered to have an appreciable adverse cumulative impact on the environment.



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## 7 Conclusion

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This proposed replacement telecommunications facility will form an integral part of the Telstra network and is designed to meet the growing demand for mobile data services.

This proposed facility is primarily required to continue providing improved mobile call and data service to Paringi and the surrounding area. The replacement facility is considered to be the most prudent approach to fulfilling Telstra's mobile telecommunications coverage requirements, with most benefit and least impact on the local community and area.

The proposed facility is considered appropriate for the below reasons:

- The proposal utilises a slimline guyed mast design and compact headframe that reduces adverse visual impact in the area.
- The proposal although visible to varying degrees, is considered to have acceptable visual impact in a rural setting. Additional screening is also offered by existing vegetation.
- The proposed installation will have minimal impact on the general use of the land.
- The proposal is also considered the most appropriate solution between the competing demands of planning, coverage, design, property, construction and the expectations of stakeholders.
- The proposal will provide good mobile telecommunication service to the Paringi area, ensuring residents and businesses in the area experience uninterrupted access to what is now considered an essential service. This will in turn enable socio-economic benefits to the community.
- No clearing or disturbance of vegetation is proposed or required as part of this proposal, either during the build phase or once operational. Further, the proposal will not have adverse impacts on runoff or sedimentation given its small footprint, within a large rural property.
- The facility will comply with all Government health standards outlined by ARPANSA.

We respectfully request that Council considers the limited impacts and expected benefits of this proposed facility in assessing this Development Application.



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## 8 References

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- 1) Google Maps
- 2) Google Earth
- 3) Industry Code (C564:2020) Mobile Phone Base Station Deployment
- 4) Telecommunications Act 1997
- 5) Telecommunications (Low-impact Facilities) Determination 2018 and Telecommunications (Low-impact Facilities) Determination Amendment 2021
- 6) ARPANSA Environmental EME Report



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|-------------------|---------------------|
| <b>Appendix A</b> | Title Documents     |
| <b>Appendix B</b> | Preliminary Plans   |
| <b>Appendix C</b> | EME Report          |
| <b>Appendix D</b> | Owner' Consent Form |

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