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Department of Planning and Environment
Alpine Resorts Team – Regional Assessments
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To whom it may concern:

**RE: Proposed upgrade of an existing Optus telecommunications facility
Catshed Workshop, Friday Drive, Thredbo Village NSW 2625
Lot 875 DP 1243112
STATEMENT OF ENVIRONMENTAL EFFECTS**

I advise **SAQ Consulting Pty Ltd** acts on behalf of **Optus Mobile Pty Ltd** ('Optus') in respect of this application. The proposal by Optus is to upgrade an existing telecommunications facility at Catshed workshop, Friday Drive, Thredbo Village – specifically, on lot 875 DP 1243112.

The upgrade consists of the addition of 5G equipment to the existing 25m- tall monopole facility, which is located near the Catshed workshop, about 500 metres to the north-west of Thredbo Village.

The upgrade is such that it would normally comprise a 'low-impact' facility, not requiring planning approval. However, the existing facility is located within the Kosciuszko National Park and is therefore within an area of environmental significance.

Pursuant to clause 4.6 of the *State Environmental Planning Policy (Precincts – Regional) 2021*, the consent authority in this instance is the Minister for Planning.

The key relevant documents for consideration in the assessment of the application are:

- *National Parks and Wildlife Act 1974*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Precincts – Regional) 2021*

As the proposed upgrade utilises an existing Optus facility, there will be no additional external environmental issues created and therefore no relevant matters to be considered pursuant to the *Environmental Protection and Biodiversity Act 1999* (Cth) or the *Biodiversity Conservation Act 2016*.

This letter constitutes the Statement of Environmental Effects (pursuant to the requirements of the *Environmental Planning and Assessment Act 1979*) and accompanies the proposal plans and other lodgement information. A copy of the owner's consent is attached.

Need for the Facility

The facility is needed to provide 5G services, which will improve Optus network coverage and capacity to the area around the existing monopole facility, including in Thredbo Village.

The location of the existing facility is about 500 metres to the west/north-west of Thredbo Village and at the base of the mountain. In winter the area is a ski resort with vast amount of snow terrain and winter activities. In summer, Thredbo is a hiking and summer sport and event destination. As such, there are, at various times throughout the year, very large numbers of visitors to the area and Thredbo is a key settlement for visitor experiences to Kosciuszko National Park.

The upgrade at this facility will provide a greatly enhanced customer experience in the surrounding area and assist in providing sufficient network capacity to cope with surges in demand.

In selecting a suitable location for a new facility, Optus has had regard to the 'precautionary principle' as set out in the Appendix A of the Industry Code C564:2020 for mobile phone base station deployment.

The location of the existing Optus facility on lot 875 is indicated in Figure 1 below.



Figure 1: Existing Optus facility at Thredbo Village

Subject Site

The subject site is identified as Lot 875 on DP1243112, Catshed Workshop, Friday Drive (Alpine Way), Thredbo NSW 2625 and is controlled by Kosciuszko Thredbo Pty Ltd. The location of the subject site is shown in Figure 2 below.



Figure 2: *Existing Optus facility near Catshed Workshop*

The existing facility is located approximately 50m south-east of the Catshed workshop and is part of a large area of disturbed land, buffered to nearby vegetation. The Catshed workshop is an operational building housing snow ploughing vehicles, machinery and other equipment associated with the area's use as a ski resort.

The Catshed workshop area is accessed via the existing access track from Thredbo village. The subject site currently hosts a 25m high steel monopole and an equipment shelter located at ground level adjacent to the monopole, which comprise the existing Optus mobile phone base station.

The Proposal

The proposal is to replace and upgrade equipment at the existing monopole facility.

The proposed upgrade involves the following works:

- Replacement of four existing panel antennas at the top of the existing monopole. Each new antenna measures 2.688m in length;
- Installation of four new remote radio units (RRUs), to be mounted with existing RRUs at the top of the monopole;
- Replacement of the existing GPS antenna (mounted to the adjacent existing equipment building);

- Installation of new base-station equipment within the existing equipment building; and
- Installation of new cabling and other ancillary items.

The existing access route will continue to be used and the facility operates on a continuously unmanned basis with only periodic visits required for maintenance purposes. No change to the supply of power and fibre to the existing Optus facility is required as part of the proposed upgrade.

Whilst not a relevant planning issue, it is worthy of note that the maximum levels of electromagnetic energy from the proposed facility as a result of the upgrade is estimated at **2.35%** of the exposure limits mandated by the Commonwealth Government and the proposed infrastructure will be in compliance with the ACMA EME regulatory arrangements.

Specifically, the facility will comply with Australian government regulations in relation to emission of electromagnetic energy (EME), this specifically being Australian Standard Radiation Protection Series S-1 Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in 2021.

A copy of the standard form EME report is **attached** for Council's information.

Assessment

As noted above, the scope of the proposed upgrade would normally fall within the definition of a 'low-impact' facility, pursuant to the *Telecommunications (Low-Impact Facilities) Determination 2018 (Cth)* ('the Determination'). However, the location of the existing facility is within an 'area of environmental significance', as defined in section 2.5 of the Determination, and cannot therefore be a 'low-impact' facility.

National Parks and Wildlife Act 1974

Clause 153D of the *National Parks and Wildlife Act 1974* allows for the lease or licencing of telecommunications facilities. Such a tenure arrangement is already in place under this provision and as the proposal is for an upgrade of the existing facility, no changes to the tenure requirements are necessary.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* ('the Transport and Infrastructure SEPP') is applicable to the facility and in particular Division 21, which deals specifically with telecommunications facilities. Division 21 sets out when development for the purposes of telecommunications may be carried out with or without consent.

The Transport and Infrastructure SEPP does not permit development without consent (either as exempt or complying development) where the land in question is within an environmentally sensitive area within the meaning of the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*.

Clause 1.4(2)(a) of the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008* lists land to which Chapter 4 of the *State Environmental Planning Policy (Precincts – Regional) 2021* applies is excluded from exempt and complying development provisions. Chapter 4 relates to the Kosciuszko National Park and alpine resorts, which includes the location of the existing Optus facility.

As such, the exempt and complying development provisions of the Transport and Infrastructure SEPP do not apply in this instance and consent is required.

Clause 2.142 of the Transport and Infrastructure SEPP sets out when development for the purposes of telecommunications with consent may occur. It states:

- (1) Development for the purposes of telecommunications facilities, other than development in section 2.140 or development that is exempt development under section 2.20 or 2.143, may be carried out by any person with consent on any land.*
- (2) Before determining a development application for development to which this section applies, the consent authority must take into consideration any guidelines concerning site selection, design, construction or operating principles for telecommunications facilities that are issued by the Secretary for the purposes of this section and published in the Gazette.*

The relevant guidelines are the *NSW Telecommunications Facilities Guideline including Broadband, July 2010*. The guideline contains four principles in relation to telecommunications facilities, which are listed below along with a comment on the compliance (or otherwise) of the proposed facility upgrade.

Principle 1: A Telecommunications facility is to be designed and sited to minimise visual impact

The proposed upgrade will occur at the existing Optus facility and principally involves the replacement of existing panel antennas with similarly dimensioned panel antennas with ostensibly the same appearance. As such, the design of the proposed upgrade minimises visual impact.

Principle 2: Telecommunications facilities should be co-located wherever practical

The proposed upgrade will occur at the existing Optus facility and is therefore a collocated facility.

Principle 3: Health standards for exposure to radio emissions will be met

As demonstrated by the attached EME report, the proposed upgrade will comply with the relevant standard with respect to electromagnetic emissions.

Principle 4: Minimise disturbance and risk, and maximise compliance

The proposed upgrade will occur at the existing Optus facility, with no additional ground-based equipment. As such, disturbance and risk has been minimised.

Based on the above, the proposed upgrade is consistent with the outcomes sought the Transport and Infrastructure SEPP.

State Environmental Planning Policy (Precincts – Regional) 2021

The location of the existing Optus facility and the proposed upgrade is within an area covered by the *State Environmental Planning Policy (Precincts – Regional) 2021* ('the Regional Precincts SEPP').

Chapter 4 of the Regional Precincts SEPP deals specifically with Kosciuszko National Park and alpine resorts, within which Thredbo Village and surrounds (collectively the Thredbo Alpine Resort) are included.

The Land Use Table for the Thredbo Alpine Resort lists a telecommunications facility as a land use permitted with consent. Clause 4.6 sets out the consent authority for the purposes of Chapter 4 as being the Minister.

The aim of Chapter 4 is *"to protect and enhance the natural environment of the alpine resorts...by ensuring development in those resorts is managed in a way that has regard to the principles of ecologically sustainable development."*

The objectives of Chapter 4 includes a reference to *"the carrying out of a range of development in the alpine resorts (including the provision of services, facilities and infrastructure...) that do not result in adverse environmental, social and economic impacts."*

As such, given the proposed upgrade is located on an existing telecommunications facility, it achieves the intent of the both the aim and objectives of the SEPP in this regard.

Matters to be considered by the consent authority are listed at clause 4.12, which are set out and assessed below.

- (1) In determining a development application that relates to land to which this Chapter applies, the consent authority must take into consideration any of the following matters that are of relevance to the proposed development—*
- a. the aim and objectives of this Chapter, as set out in section 4.1*

As set out above, the proposed works associated with the 5G upgrade are collocated on an existing Optus facility and principally involves the replacement of existing equipment. As such, the aim and objectives set out in section 4.1 are achieved.

- b. the extent to which the development will achieve an appropriate balance between the conservation of the natural environment and any measures to mitigate environmental hazards (including geotechnical hazards, bush fires and flooding)*

The existing facility is already positioned in a cleared area and as such there is no impact on the natural environment and no additional measures to mitigate environmental hazards are required.

- c. having regard to the nature and scale of the development proposed, the impacts of the development (including the cumulative impacts of development) on the following—*

- i. the capacity of existing transport to cater for peak days and the suitability of access to the alpine resorts to accommodate the development,*
- ii. the capacity of the reticulated effluent management system of the land to which this Chapter applies to cater for peak loads generated by the development,*
- iii. the capacity of existing waste disposal facilities or transfer facilities to cater for peak loads generated by the development,*
- iv. the capacity of any existing water supply to cater for peak loads generated by the development*

The proposed upgrade:

- will not result in any changes to access arrangements to the existing Optus facility, nor create any additional transport demand;
- is not connected to the effluent management system (nor is connection required);
- does not create any waste during its day-to-day operation; and
- does not require connection to water supply.

- d. any statement of environmental effects required to accompany the development application for the development*

As stated above, this letter constitutes the statement of environmental effects and in its preparation has had due regard for all relevant matters.

- e. if the consent authority is of the opinion that the development would significantly alter the character of the alpine resort—an analysis of the existing character of the site and immediate surroundings to assist in understanding how the development will relate to the alpine resort*

The proposed upgrade will not significantly alter the character of the Thredbo alpine resort.

- f. the Geotechnical Policy—Kosciuszko Alpine Resorts (2003, Department of Infrastructure, Planning and Natural Resources) and any measures proposed to address any geotechnical issues arising in relation to the development*

The proposed upgrade is located at an existing Optus facility, consisting primarily of a 25m-tall monopole and ground-based equipment shelter. As such, no additional measures with respect to geotechnical matters need to be considered.

- g. if earthworks or excavation works are proposed—any sedimentation and erosion control measures proposed to mitigate any adverse impacts associated with those works*

No earthworks are proposed or required.

- h. if stormwater drainage works are proposed—any measures proposed to mitigate any adverse impacts associated with those works*

No stormwater drainage works are proposed or required.

- i. any visual impact of the proposed development, particularly when viewed from the Main Range*

The proposed upgrade principally involves the replacement of four existing panel antennas with panel antennas of similar dimensions and appearance, as well as a small amount of additional equipment on the headframe of the existing monopole and additional base-station equipment within the existing equipment building. As such, there will be no material increase in the visual impact of the facility arising from the proposed upgrade.

- j. the extent to which the development may be connected with a significant increase in activities, outside of the ski season, in the alpine resort in which the development is proposed to be carried out*

The proposed upgrade will better enable the existing facility to better cater for demand throughout the year and provide an improved level of service to Thredbo Village and surrounds. However, the upgrade itself will not be the cause of any changes in the level of activity in the area.

- k. if the development involves the installation of ski lifting facilities and a development control plan does not apply to the alpine resort –*
 - i. the capacity of existing infrastructure facilities, and*
 - ii. any adverse impact of the development on access to, from or in the alpine resort*

The proposal does not involve the installation of a ski lifting facility.

- l. if the development is proposed to be carried out in Perisher Range Alpine Resort—*
 - i. the document entitled Perisher Range Resorts Master Plan, as current at the commencement of this Chapter, that is deposited in the head office of the Department, and*
 - ii. the document entitled Perisher Blue Ski Resort Ski Slope Master Plan, as current at the commencement of this Chapter, that is deposited in the head office of the Department*

The proposal is not within the Perisher Range Alpine Resort.

- m. if the development is proposed to be carried out on land in a riparian corridor—*
 - i. the long term management goals for riparian land, and*
 - ii. whether measures should be adopted in the carrying out of the development to assist in meeting those goals.*

The proposal is not within a riparian corridor.

As such, the proposed upgrade will have no material adverse impact on any of the relevant considerations and is therefore consistent with the outcomes sought by the Regional Precincts SEPP.

Other Relevant Matters

Vegetation Clearance

The existing Optus facility is located in an already cleared area, buffered from nearby vegetation and with existing access. As such, there is no additional impact on vegetation.

Visual Impact

As described above, the proposed upgrade consists of the replacement of existing panel antennas, a small amount of additional equipment (RRUs) installed on the existing monopole and base-station equipment within the existing equipment building. As such, there is no material increase in visual impact.

Environmental Impact

As the proposed upgrade will occur on an existing facility, there will be:

- no impacts on flora or fauna
- no increase in bushfire risk
- no impacts on soil or water (including no increases in stormwater runoff)
- no excavation (and therefore no sediment or erosion issues arising)
- no increase in noise during normal operation
- no impact on air quality
- no generation of waste
- no additional traffic generation

As noted above, the proposed facility will, at all times, comply with the relevant electromagnetic emissions standards.

Heritage

As the proposed upgrade will occur at an existing Optus facility and will result in no material increase in visual impact, there are no heritage issues arising from the proposal.



Conclusion

The proposal is to upgrade an existing Optus telecommunications facility to enable the provision of 5G services to Thredbo Village and surrounds.

As the proposed upgrade will occur on the existing Optus monopole facility and principally involves the replacement of existing equipment, there are no materially adverse impacts arising, as detailed above.

The proposed upgrade will provide significant improvements to the performance of the Optus network in the Thredbo alpine resort and wider area, particularly during peak times and as such, there is substantial public benefit arising from the proposal.

As set out above, the proposed upgrade is also consistent with the outcomes sought by the relevant parts of both the Transport and Infrastructure and Regional Precincts SEPPs.

The development application therefore warrants planning approval.

Should additional information prior to the application's determination, please do not hesitate to contact the undersigned.

Yours sincerely

MARK BAADE

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Attachments:

Owner's consent

Proposal plans

EME report