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Dear Mark

RE: DA 22/11021 (PAN-246432)
Proposed upgrade of an existing Optus telecommunications facility
Alpine Way, Thredbo NSW 2625 (Lot 863 DP 1128686)
RESPONSE TO REQUEST FOR FURTHER INFORMATION

As you are aware, **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 Alpine Way, Thredbo – specifically, on lot 863 DP 1128686.

The upgrade consists of the replacement of existing panel antennas and the addition of 5G equipment (including three panel antennas) to the existing 9.7m-tall monopole facility, which is located about two kilometres to the north-west of Thredbo Village adjacent the Kosciuszko Radio Tower and Lift Station and Eagles Nest Restaurant.

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. To that end a development application has been lodged with the Department.

I am in receipt of your request for further information (by email, dated 23/9/22). I am pleased to provide the following information in response.

1. *Assessment against s7.3 Biodiversity Conservation Act 2016*
The existing facility has previously been the subject of a substantial upgrade, including to the structure and footings. The upgrade now proposed replaces and/or installs new equipment on the existing structure. It does not require any upgrade to the footings, re-uses existing cabling and a small amount of new cabling (connecting the structure to the equipment shelter located inside the nearby restaurant building) utilises the existing cable ladder/tray already in place.

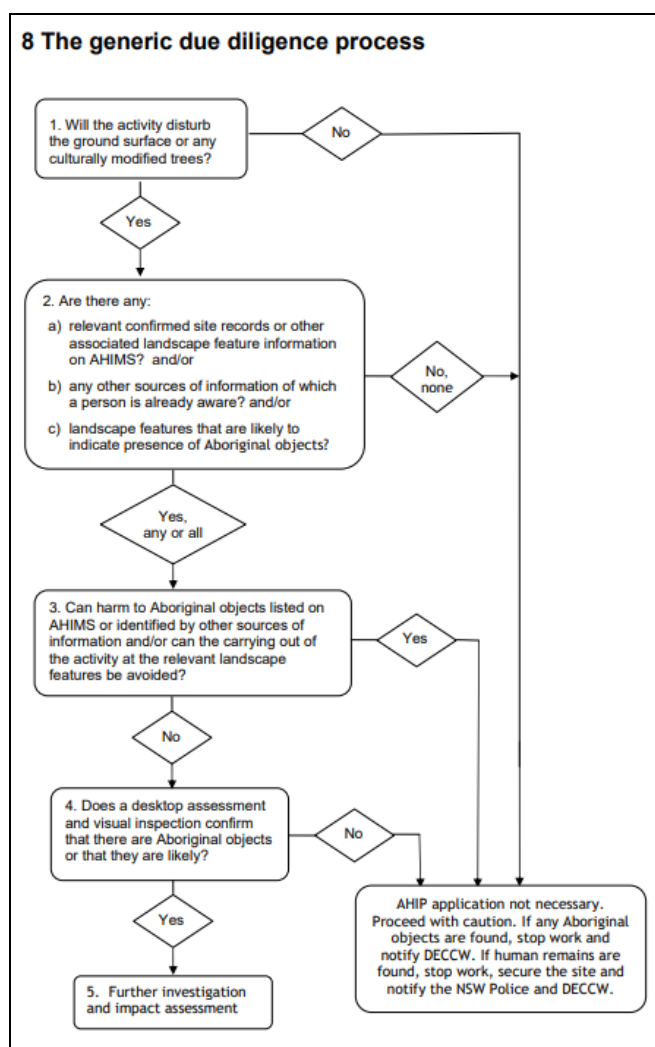
Existing access arrangements, protocols and management requirements will be used for the upgrade works.

As such, given there are no new ground works or other similar disturbances associated with the upgrade, when considered against the tests in section 7.3 of the *Biodiversity and Conservation Act 2016*, the proposed upgrade:

- Will not have any adverse impact on the life cycle of a threatened species, nor place it at risk of extinction;
- Will not have any adverse impact on the extent of any ecological community, nor place it at risk of extinction;
- Does not propose to remove, modify, fragment any habitat;
- Will not have any adverse impact on any areas of outstanding biodiversity value, either directly or indirectly; and
- Is not part of a key threatening process.

2. Aboriginal Cultural Heritage

A due diligence assessment has been undertaken to determine whether the works would impact on any Aboriginal objects or whether an Aboriginal Heritage Impact Permit (AHIP) is required. This assessment has been undertaken in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW and shown in the diagram below.





The due diligence assessment has been undertaken for the site at as follows:

1. *Will the activity disturb the ground surface or any culturally modified trees?*

Answer: No – AHIP application not necessary, proceed with caution.

Further, considering that the ground has already been disturbed during the original construction, the landscape does not indicate the presence of Aboriginal objects. In addition, mitigation measures could also be included as part of conditions of any consent. Therefore, an AHIP is not required and work would proceed with caution.

3. Site Environmental Management Plan (SEMP)

A SEMP has been prepared by Ecological Australia and is attached.

4. The existing structure is owned by Axicom. A copy of Axicom's advice on the structural loading and adequacy of the structure (based on Optus's equipment requirements) is attached. On page 2 Axicom notes:

“Based on Axicom’s preliminary assessment of the structure, it has been estimated that the addition of the equipment listed in this Offer of Elevation will not overland the structure.”

As such, based on the assessment from the structure's owner (a company well resourced and experienced to provide such information), there is no indication the structure will be compromised. As a result, there are no requirements for strengthening to footings or the like.

Clause 3.1 (e) of the Department's Geotechnical Policy for Kosciuszko Alpine Resorts does not require the provision of a geotechnical report in this instance, as the works consist of minor construction works which present minimal or no geotechnical impact on the site or related land.

I trust this information is sufficient to continue with the assessment of application. Should additional information be required, please do not hesitate to contact the undersigned.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Baade', is located below the text 'Yours sincerely'.

MARK BAADE

B. Plan (Hons)

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Attachments:

SEMP

Axicom assessment