

30 May 2025

Ms Sandria Butler
Senior Planning Officer
Alpine Resorts Team | Regional Assessments
NSW Department of Planning, Housing and Infrastructure
PO Box 36, Jindabyne NSW 2627

Via NSW Planning Portal

Dear Sandria,

RE: Amendment of a Development Application 22/11021 (PAN-246432)

I am writing on behalf of Service Stream c/- Optus to seek amendment to Development Application 22/11021 (PAN-246432).

Legislative Requirements

This amendment to Development Application 22/11021 (PAN-246432) is being made under Section 37 of the *Environmental Planning and Assessment 2021* (the EP&A Reg).

37 Amendment of Development Application	Consideration
(1) An applicant may, at any time before a development application is determined, apply to the consent authority for an amendment to the development application.	The Development Application is currently under assessment in the NSW Planning Portal (Ref: PAN -246432).
(2) The application must be made on the NSW planning portal.	The application has been made on the NSW planning portal.
(3) If the application relates to State significant development— (a) the application must be in the approved form, and (b) the applicant must have regard to the State Significant Development Guidelines in preparing the application.	Not applicable.
(4) If the amendment relates to a BASIX certificate that accompanied the original development application only, the development application may instead be amended by submitting on the NSW planning portal— (a) a new BASIX certificate to replace the current BASIX certificate for the original development application, or (b) if a new document is required or a document that accompanied the original development application requires amendment—the new or amended document.	Not applicable.
(5) If the amendment will result in the development differing materially from the description contained in the BASIX certificate that accompanied the original development application, the application must be accompanied by a new BASIX certificate that takes account of the amendment.	Not applicable.
(6) If the amendment will result in a change to the development, the application must contain details of the change, including the name, number and date of any plans that have changed, to	The details of the change to the Development Application

enable the consent authority to compare the development with the development originally proposed.	are outlined in the subsequent section. Details of the name, number and date of plans that have changed are outlined in the subsequent section.
(7) A requirement to use the NSW planning portal under this section does not apply if the development application is subject to proceedings in the Court.	Not applicable.

Details of Amendment

Since the Development Application (DA) 22/11021 lodged on 22 July 2022, Optus has been investigating the ways to strengthen the regional mobile network and pave the way for new era of choice and competition for customers across regional Australia.

During the assessment period of the DA 22/11021, Optus and TPG Vodafone (TPG), have entered into new agreement for a regional Multi-Operator Core Network (MOCN). Optus will upgrade their existing sites with new equipment capable of transmitting the spectrum frequencies that will be shared. The subject site at Thredbo is one of the selected sites that intends to achieve the MOCN's outcome through upgrade works at the existing site.

This amendment to DA 22/11021 includes the works outlined below:

- Replacement of three existing panel antennas with three new panel antennas, at the top of the existing monopole (each replacement antenna measures 1.5m in length);
- Changes of the proposed maximum Electromagnetic Energy (EME) levels (**Table 2**).

Refer to the below **Table 1** outlines the scope of work description between the existing and updated plans, and **Figures 1** and **2** which show extract of the existing and updated elevation plans.

Table 1 Comparison of the scope of work description between the existing and updated plans

Existing scope of work stated in the Statement of Environmental Effects in the DA 22/11021 (based on 522122_S0200_THREDBO_RLM_02092021 v5_23.02.2022)	Updated scope of work (based on 515062_S0200_5G_5G Upgrade_200.3DES.14_FC_Drgs_16-04-2025)
<ul style="list-style-type: none"> • Replacement of three existing panel antennas at the top of the existing monopole. (Each replacement antenna measures 2.688m in length); • Installation of three new (5G) panel antennas, each 1m in length, on new mounting poles at the top of the monopole; • Installation of new base-station equipment within the existing equipment room in the restaurant complex; and • Installation of new cabling and other ancillary items. 	<ul style="list-style-type: none"> • Replacement of three existing panel antennas with three new panel antennas, at the top of the existing monopole. (Each replacement antenna measures 1.5m in length); • Installation of three new (5G) panel antennas, each 1m in length, on new mounting poles at the top of the monopole; • Installation of new base-station equipment within the existing equipment room in the restaurant complex; • Installation of new cabling and other ancillary items.

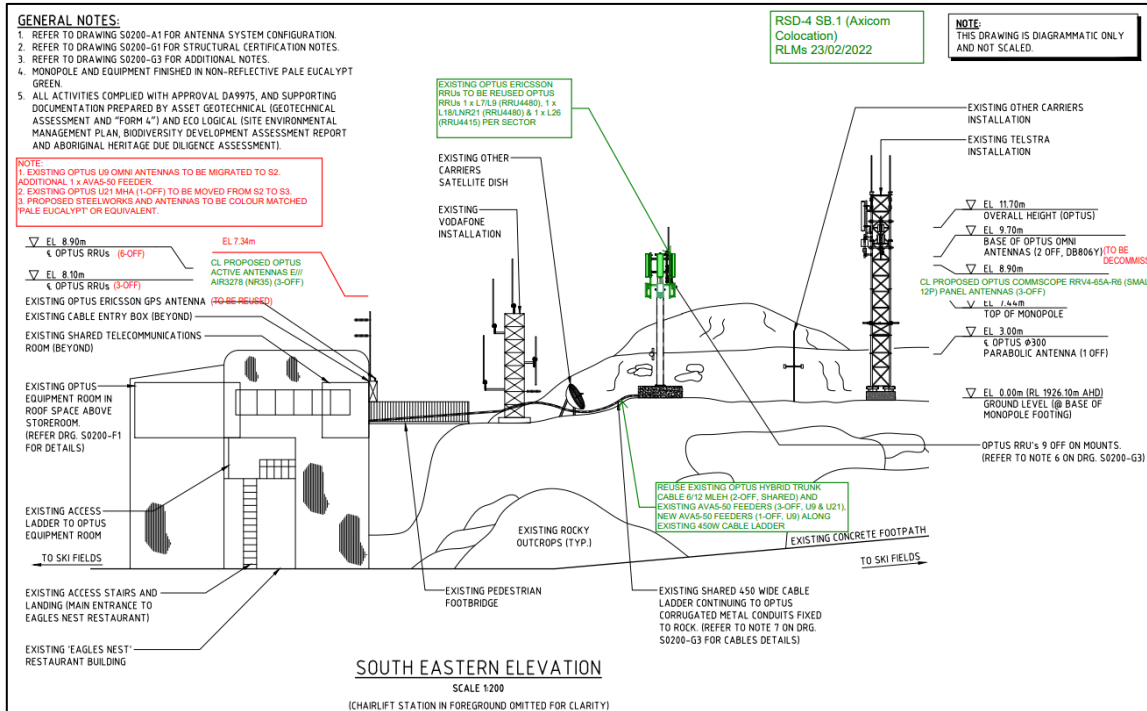


Figure 1 Existing elevation plan (Extracted from 522122_S0200_THREDBO_RLM_02092021 v5_23.02.2022)

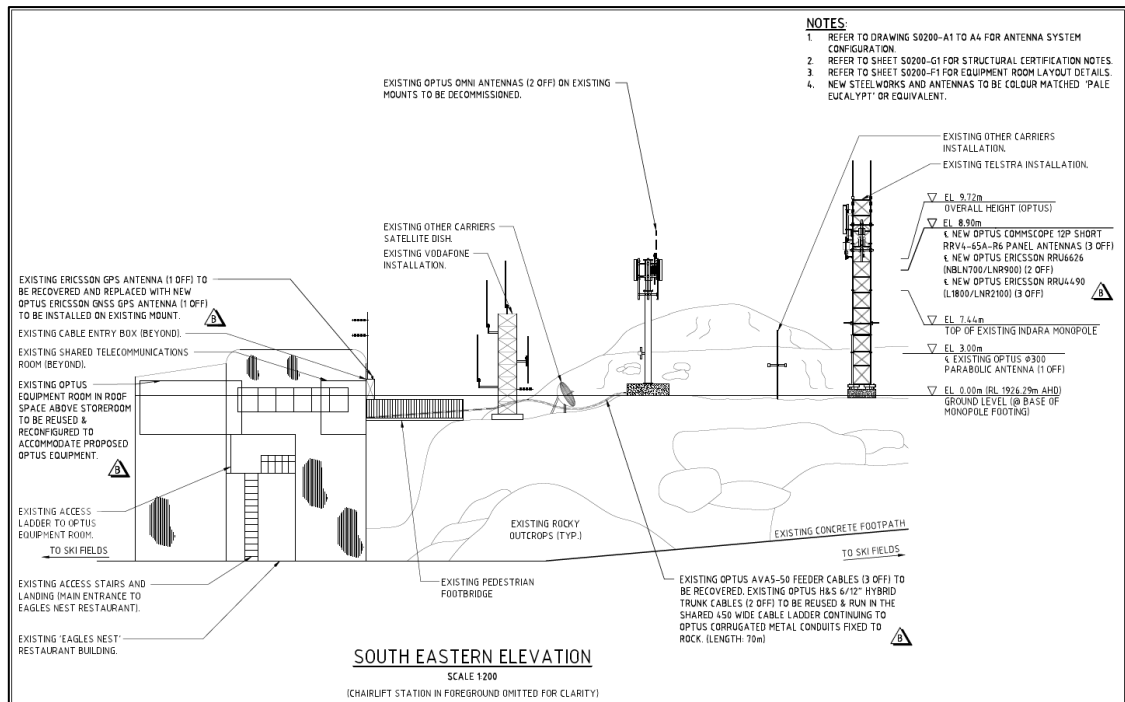


Figure 2 Updated elevation plan (Extracted from 515062_S0200_5G_5G Upgrade_200.3DES.14_FC_Drgs_16-04-2025)

Over the years, from 2022 (when the DA 22/11021) to present, multiple upgrade works have been carried out by other carriers and NSW Telco Authority at the subject site. An updated EME report, with a result of cumulative EME levels, has therefore been provided for the amendment of DA 22/11021.

Table 2 Changes of the proposed maximum EME levels at the subject site between 2022 and 2025 based on the source in the Radio Frequency National Site Archive (RFNSA)

Project	Date where the EME report uploaded on RFNSA	The maximum EME level calculated for the proposed changes at this site
Optus upgrade	11/02/2022 The EME report was submitted as part of the DA 22/11021	28.43%
Telstra upgrade	04/04/2023	34.37%
Telstra upgrade	07/06/2023	34.37%
NSW Telco Authority Upgrade	15/09/2023	34.87%
Telstra upgrade	19/10/2023	44.03%
Telstra upgrade	28/08/2024	41.51%
Optus upgrade (MOCN)	20/02/2025 The EME report is to be provided as part of the DA amendment	40.24%

Changes to Existing Documentation

Table 3 outlines the name, number and date of any documents or plans that have been updated.

Document	Existing document to be superseded	Replacement document
EME Report	EME-2625001	S0200 Thredbo - EME Report 02202025
Site plans	522122_S0200_THREDBO_RLM_02092021 v5_23.02.2022	515062_S0200_5G_5G Upgrade_200.3DES.14_FC_Drgs_16-04-2025

Additional Supporting Documentation

Table 4 outlines the additional supporting documentation for the amendment to DA 22/11021.

Document	Title	Prepared by
Structural Report	515062_S0200_5G_5G Upgrade_200.3DES.06_Structural_Report_16-04-2025	Service Stream; Structel

Furthermore, it is confirmed that the development cost will remain no change due to the change of the proposal. Therefore, a calculation of the new estimated development cost (EDC) is not provided.

The amendment to the DA 22/11021 will not alter the visual impact, or the amenity of the local area.

We trust this should now allow the assessment to continue and we look forward to a favourable outcome. Should you have queries or wish to discuss the issues further, please do not hesitate to contact the undersigned.

Yours sincerely,



Vanessa Wan

Town Planner, Service Stream Ltd

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