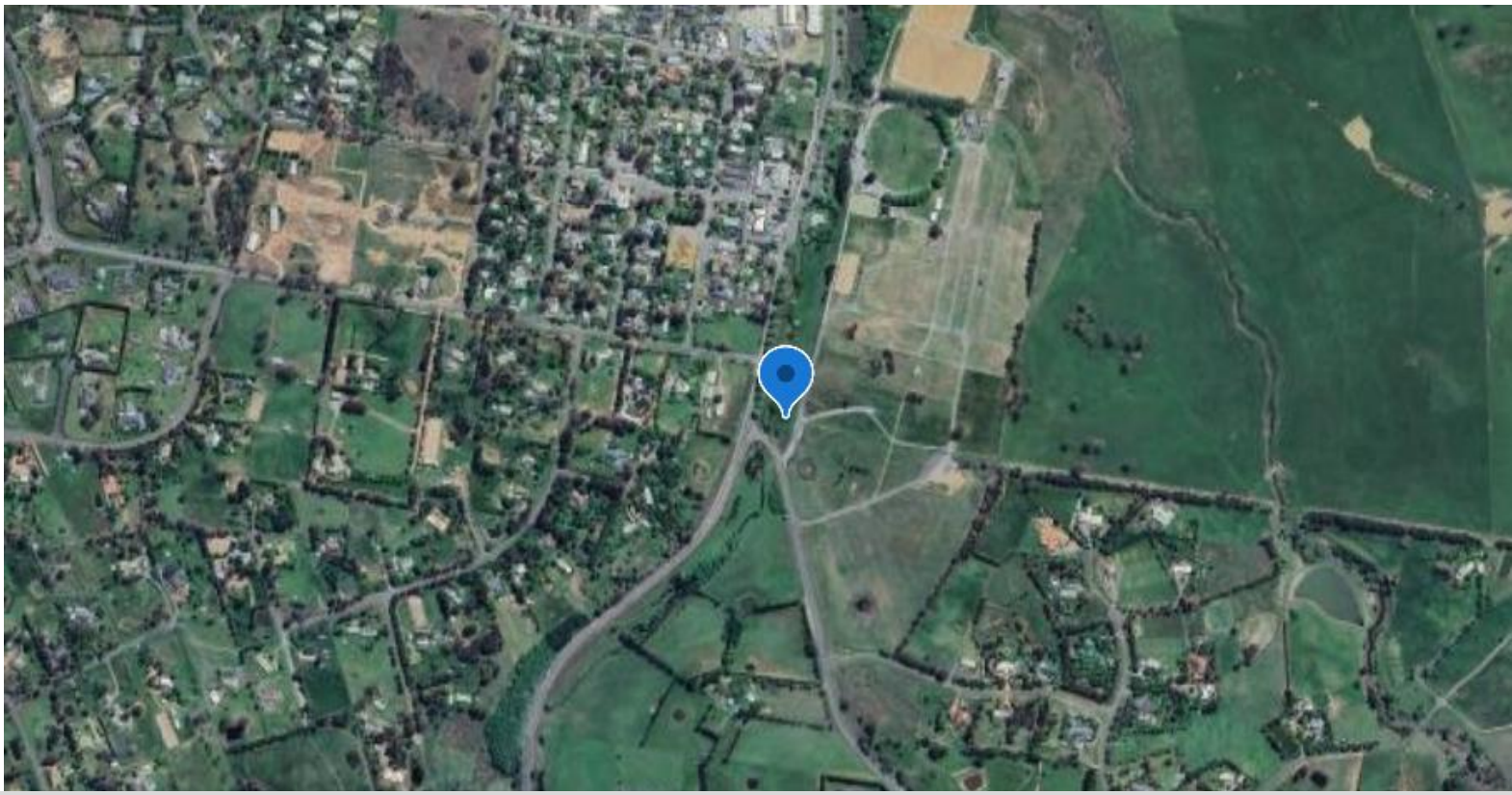

STATEMENT OF ENVIRONMENTAL EFFECTS

for A Proposed Mobile Telecommunications Facility

March 2025

Address: 9 East St, Murrumbateman, NSW 2582
Access via Lot A DP948768

Document Controls

Document description	Statement of Environmental Effects: Proposed Telecommunications Facility – 9 East St, Murrumbateman, NSW 2582			
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Prepared for:	**Prepared by:**
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Contents

Executive Summary

Proposal	Key elements of the proposed telecommunications facility are as follows: • excavation of site footings; • installation of a new 35m concrete monopole; • installation of a triangular headframe at the top of the pole; • Installation of one (1) equipment shelter • Installation of 2.4m high access gate • Installation of nine (9) new panel antennas for the provision of 4G and 5G technology mounted on the headframe at a maximum height of 36.3m; • Installation of ancillary equipment including transceivers, remote radio units, amplifiers, antenna mounts, cable trays, feeders, cabling, combiners, diplexers, splitters, couplers, jumpers, filters, electrical equipment, signage, and other associated equipment. The proposed facility is to provide improved 4G and 5G coverage to Telstra's business and residential customers in the surrounding precincts. The facility will accommodate the immediate and future coverage and capacity requirements of Telstra's network and replace coverage associated with the decommissioning of other Telstra facilities in the locality.
Site Description / Location	Address: 9 East St, Murrumbateman NSW 2582 Legal Address: Lot A On Plan 948768 Total Area of Site: 2.428 ha
Planning Scheme	**Council Area: Yass Valley Council** **LEP:** Yass Valley Local Environmental Plan 2013 **Zoning:** RU5 - Village **Existing Use**: Rural Residential **Proposed Use:** Mobile Telecommunications Facility
Application Details	Development consent sought for a Mobile Telecommunications Facility

1.0 Introduction

1.1 Overview of the Report

BMM Group Pty Ltd acts as Project Manager to Amplitel Pty Ltd, a subsidiary of Telstra that deploys telecommunications infrastructure. This Statement of Environmental Effects has been prepared by BMM Group, on behalf of Amplitel to support Telstra's wireless network with the development of a new telecommunications facility at 9 East Street Murrumbateman 2582.

The report and appendices address the merits of the proposed development with regards to the provisions of the *Yass Valley Local Environmental Plan 2013*. It is considered that the development is appropriate and justified; therefore, Council's approval of the application is sought, subject to reasonable and relevant conditions. The telecommunications facility will operate within all current and relevant standards regulated by the Australian Communications and Media Authority (ACMA).

1.2 Objectives of the Proposal

Telstra regularly undertakes detailed assessments and review of the performance and coverage of its digital mobile telecommunications network to ensure it is achieving the required objectives and is adequately servicing demand within defined areas. The review also provides an indication of areas of poor performance or where coverage does not exist. For the subject location, the immediate objective of the Telstra facility is to improve existing levels of coverage and capacity within the network to adequately service the existing customer demand.

The Murrambateman area currently suffers from insufficient Telstra mobile service which will only further deteriorate. Customer complaints about poor signal coverage as the village is expanding to the North, and consistent number of failures along the Barton Hwy were reported. Furthermore, The Murrambateman area has numerous wine farms and tourist attractions with a large patronage and the regional event - Murrumbateman Field Days will attract significant amount of people where temporary telecommunications facility is needed during the event at a significant cost. As a result, a new telecommunications facility is required to address the existing mobile service issues and to future proof the area.

The proposed telecommunications facility will deliver essential telecommunications infrastructure to the locality and provide an important and necessary link to Telstra's existing telecommunications network. The facility will improve overall mobile and mobile broadband performance in the area and provide a high-quality service which enhances the depth of coverage and call capacity within the area. The facility will also provide capacity for other telecommunications carriers to co-locate on the structure.

2.0 Site Selection

2.1 Opportunities to Collocate

State, Federal and Local government legislation encourages the use of existing telecommunication facilities for the colocation of antennas. When it was determined that a new facility was required in the area, Telstra explored potential colocation options.

As depicted below in **Figure 1**, the closest available colocation options are not suitable to deliver the required coverage for various reasons.

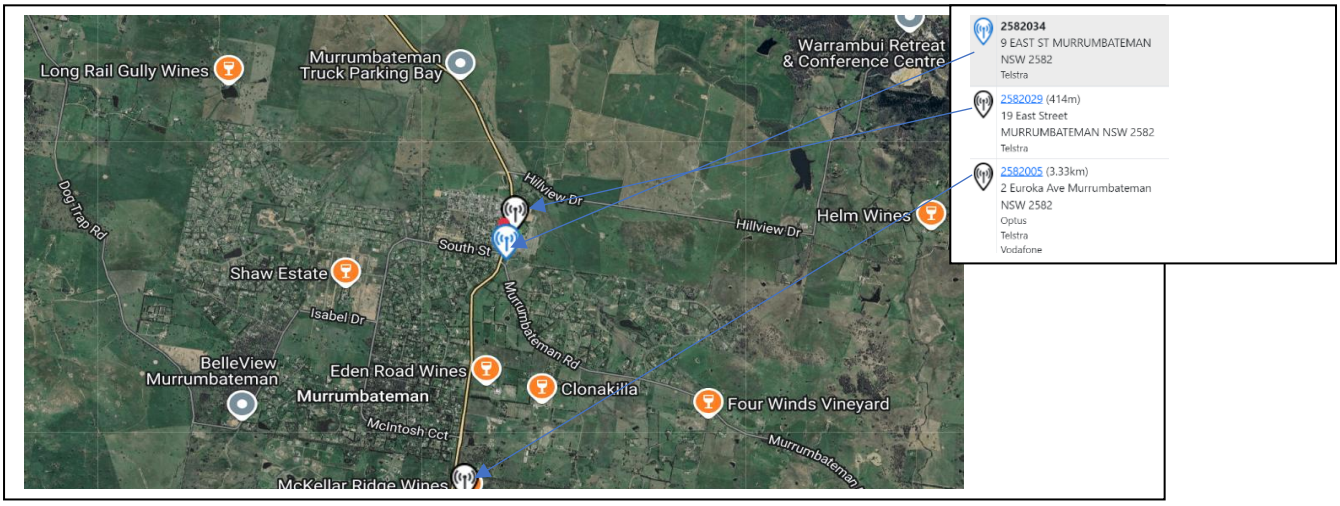

Figure 1: *RFNSA Map demonstrating that there are no other suitable existing sites within the immediate Murrumbateman area (Source: RFNSA)*

The facility (rfnsa number 2582005) at 2 Euroka Ave, Murrumbateman NSW 2582 is over 3km away from the proposed facility and it is not practical to upgrade this facility to provide the required service.

The facility (rfnsa number 2582029) at 19 East Street Murrumbateman NSW 2582 is the nearest Telstra facility. However, the existing facility is a temporary facility mounted on a movable platform and is incapable to accommodate proposed upgrade.

As a result, the new site is the most practical solution to addressing the mobile service issues in the area.

Should Telstra be required to progress with a height below the proposed facility or further away from the target coverage area, it would result in decreased performance and increase the need for future sites to supplement the coverage.

2.2 Site Selection

In areas where the deployment of a new site is required, a "search ring" is identified by Telstra's radiofrequency engineers describing where a facility is required in order to deliver the required network improvement.

There are many competing factors to be considered in determining possible suitable locations to site a telecommunications facility. These include the availability of land, requirements of the landowner, visual impact, cost, access for maintenance purposes, construction issues, planning objectives and radio frequency requirements such as coverage objectives, capacity, network design constraints, line of sight and height of surrounding buildings, trees, hills and other structures. An in-depth site selection process was undertaken in the area prior to confirming the site as the preferred location.

Carriers are required to apply a precautionary approach when designing their radio communications networks. A number of candidates were therefore identified through this selection process and

evaluated against the criteria within Table 1. *N.B. the criteria may not represent an exhaustive list of issues that need to be addressed when designing mobile network infrastructure.*

Table 1: Site Selection Criteria

Key Factors	Key Criteria
Planning	Compliance with the Yass Valley Local Environmental Plan 2013
	Acceptability to the local Council and community
	Suitable location with regard to sensitive land uses and environmental factors
	Minimal potential visual impacts
	Compliance with the EME standards mandated by the Australian Communications and Media Authority (ACMA)
	Minimal environmental impact on the subject site and surrounding area
	Potential co-siting with another existing telecommunications facility
Property	Willingness by the owner to enter into a lease agreement and provide access during construction and operation
Engineering	Feasibility of construction, availability of infrastructure such as power, and access to the facility for construction and maintenance
Radio Frequency and Coverage	Ability to be linked to the existing telecommunications networks and meet the radio frequency coverage objectives for the area

These considerations are applied to the site selection process with differing weight. Firstly, the applicant cannot locate a facility on a site without the landowners willing consent. There is also no point in locating a facility where radio frequency requirements are not met. Generally, greater coverage is achieved with an elevated location combined with a taller base station structure. Additional base stations may be required if height is restricted. The best location to build base stations to maximise network performance efficiency is closest to where those services are required.

Mobile telecommunication facilities provide coverage to an area with three sectors of antennas that cover approximately 120 degrees each. By locating within the search area, the telecommunications facility is able to provide coverage and capacity to customers on all three sectors.

The nature of any base stations is such that reliable communication is limited mainly to "line of sight" of the mobile. Whilst some buildings and foliage can be penetrated to a limited extent, radio signals cannot penetrate more substantial objects, such as hills. Accordingly, in order to achieve Telstra's network performance and quality requirements for the area, the base station must be located In an elevated location and have antennas above the treeline. The subject site, which is located near to the highest point in the search area, is suitable to achieve Telstra's coverage objectives.

To establish criteria for site selection, an assessment of the immediate area was undertaken to determine the best long-term plan for the design and configuration of the network. The proposed standalone facility provides for the most effective and sustainable long-term plan for Telstra's network and is deemed to

satisfy the requirements of Yass Valley Local Environmental Plan 2013, contributes to the local area and broader success as a sustainable and connected community, and has been appropriately sited and designed to ensure that the amenity of the locality will not be compromised.

2.3 Candidate Sites

Following the identification of the search area, a total of 4 candidate sites were thoroughly examined for the installation of a new mobile base station. Each candidate was assessed based on the ability to meet the service objectives and site considerations detailed above. The search area is comprised of a number of different land uses that are to be serviced by the proposed facility.

Figure 2 below indicates the location of the candidates considered within the site selection process. A summary of the candidate assessment is set out in Table 2 below.

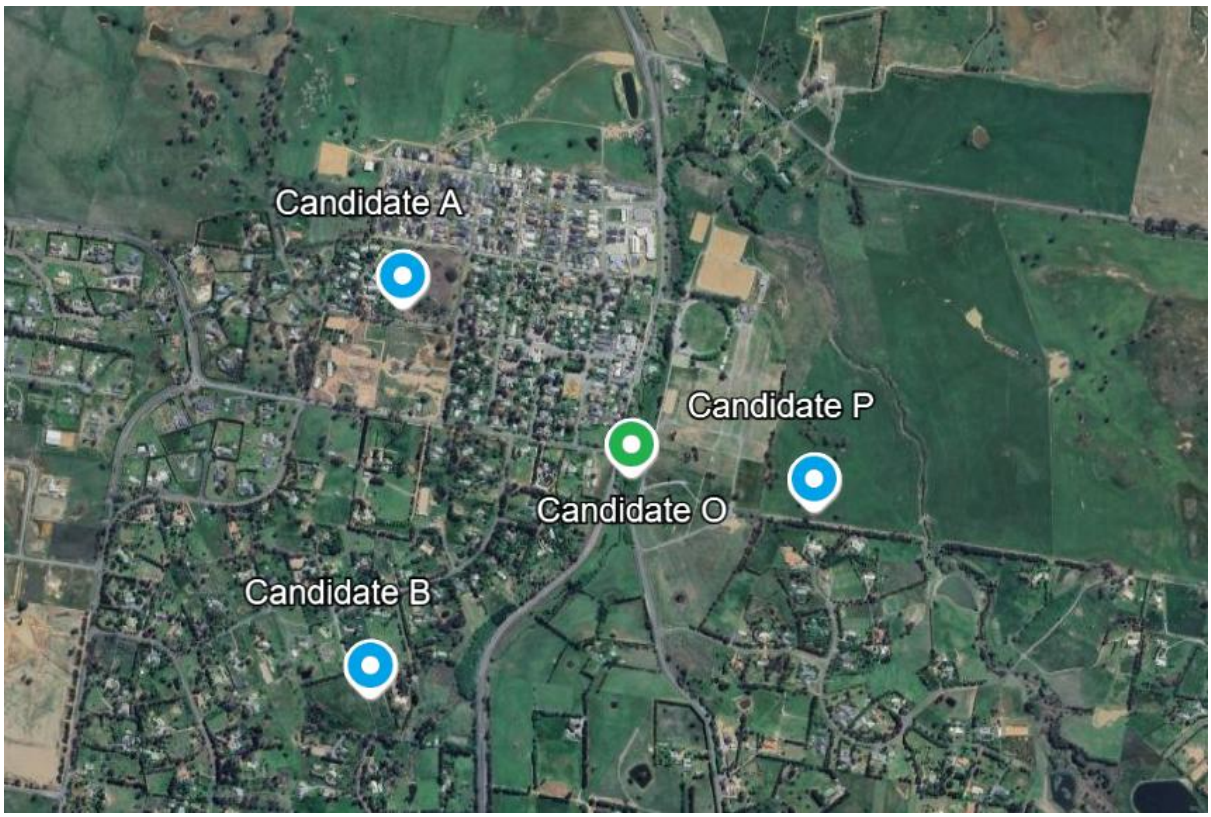

Figure 2: *Location of potential candidate sites (Source: Google Earth)*

Table 2: Candidate Site Details

Candidate	Address	Facility Type	Description
A	Cnr Hercules and, West St, Murrumbateman NSW 2582, Murrumbateman Village Grassy Woodlan	Monopole	Amplitel investigated the installation of a new monopole at this location. The site is zoned RU5 -Village From a RF engineering perspective this candidate is not suitable to deliver the required coverage. The proposed facility will also pose more visual impact than other candidates. Therefore, the candidate was rejected

B	MORRISON PL MURRUMBATEMAN 2582	Monopole	Amplitel investigated the installation of a new monopole facility at this location. The site is also zoned ENT – Enterprise and is the siting of a telecommunications exchange. From a RF engineering perspective this candidate is not suitable to deliver the required coverage. It is 900m outside the search ring Therefore, the candidate was rejected
O	9 EAST ST, MURRUMBATEMAN NSW 2582	Monopole	Amplitel investigated the installation of a new monopole at this location. The land is zoned RU5 - Village From an RF engineering perspective this candidate is suitable to deliver the required coverage. Site is a grassy open space, no known action groups or new development in proximity. Therefore, the candidate was selected as it presents the best balance of the relevant disciplines.
P	104 HILLVIEW DR, MURRUMBATEMAN NSW 2582	Monopole	Amplitel investigated the installation of a new monopole at this location. The land is zoned RU5 - Village From an RF engineering perspective this candidate is suitable to deliver the required coverage. However, it is not as good as O, which can dominant coverage to the northern Murrumbateman area. From Design & Construction perspective access to the proposed location (candidate coordinate) rear of two nearby residents might be an issue due to access through the gate from council park/playground area Therefore, the candidate was rejected

The site selection process also incorporates mandatory Deployment Code (C564:2020) activities which are undertaken in order to justify the proposed location of the subject site. This is inclusive of a "traffic light model" system which determines community-based sensitivities, within both social and legislative based frameworks.

2.4 Preferred Site

The candidate at 9 East St, Murrumbateman NSW 2582 was selected as the preferred site for the following reasons:

- The proposed site location is appropriately situated on a rural residential site;
- The proposed land use is consistent with the setting and generally compatible with adjoining land uses;
- The availability of viable connections to the power and transmission networks in the area;

- No significant vegetation clearing is required to establish a power supply, or access. The proposed development footprint does not contain significant biodiversity value and will not impact upon the general biodiversity value.
- The proposal is considered to be consistent with and provides acceptable solutions in relation to local and state environmental planning requirements. The proposal is not expected to have an adverse impact on the environment during construction and operation of the facility. Town planning considerations (such as zoning, surrounding land uses, environmental significance, compliance with the planning instrument and visual impact).
- The proposed facility will be designed and constructed to accommodate co-location of equipment by other telecommunications carriers.
- The proposed facility will be unstaffed on a continuous basis (other than occasional access for maintenance) and will have no measurable impact on traffic.
- The proposed location will enable superior RF coverage to the Murrumbateman area , surrounding residential precincts and significant proposed development in the area; and
- Tenure – obtaining an agreement with the landowner of the subject site provides certainty in determining the location of a mobile phone base station.

As a result of the extensive selection process for this site location, Amplitel has decided to proceed with the proposed new 35-metre concrete monopole facility at 9 East Street Murrumbateman 2582. All the existing telecommunications facilities mentioned in the previous section are not able to support the proposed equipment. The proposed new 35m facility will meet Telstra's radio frequency objectives whilst satisfying construction feasibility, town planning considerations, environmental impacts, visual amenities, and engineering factors. In addition, Telstra will make sure that the new site will meet strict government regulations on electromagnetic energy (EME) ensuring the safety of the general public.

Section 6 provides a detailed assessment of these potential environmental impacts and describes proposed mitigations. The assessment concludes that the development is unlikely to have a detrimental impact on the environment or the locality.

3.0 Proposed Development

3.1 Proposal Summary and Construction

The proposed schedule of works seeks to improve mobile services and provide new coverage to the development proposed in the area. A summary of the proposed development is as follows:

- excavation of site and installation of footing;
- installation of a new 35m concrete monopole;
- installation of a triangular headframe at the top of the pole;
- Installation of one (1) equipment shelter
- Installation of nine (9) panel antennas for the provision of 4G and 5G technologies mounted on the headframe at a maximum height of 36.3m;
- Installation of ancillary equipment including transceivers, remote radio units, amplifiers, antenna mounts, cable trays, feeders, cabling, combiners, diplexers, splitters, couplers, jumpers, filters, electrical equipment, signage, and other associated equipment.

A diagram of the proposed telecommunications facility is displayed below in **Figure 3**. The full design drawings are available in the appendix to this report. Refer to **Appendix A** – Proposal Plans.

Given the unique nature of the proposed development, the development and construction of the mobile phone base station primarily consists of the following processes:

- Pre-construction – ensuring that the land is suitable for construction. This is inclusive of confirming existing structural assessments and the provisioning of cabling;
- Installation of new equipment – reflective of the scope of works outlined within this Development Application; and
- Network Integration – Ensuring that the mobile phone base station can connect with both end users and other sites within the Telstra network.

Throughout the construction phase of the proposed development, any construction works will not disturb existing traffic flows. If a road closure is required for the erection and installation of equipment, the appropriate approvals will be obtained from the relevant authorities.

A total construction period of approximately six weeks (including civil works and network integration and equipment commissioning) is anticipated. Construction activities will involve four basic stages:

- Stage 1 (Week 1) – Site preparation works, including field testing, ground preparation and construction of foundations and footings;
- Stage 2 (Week 2) – Installation of the pole;
- Stage 3 (Week3) – Construction of the equipment shelter and fences;
- Stage 4 (Weeks 4 – 6) – Installation of antennas and radio equipment, as well as equipment testing.

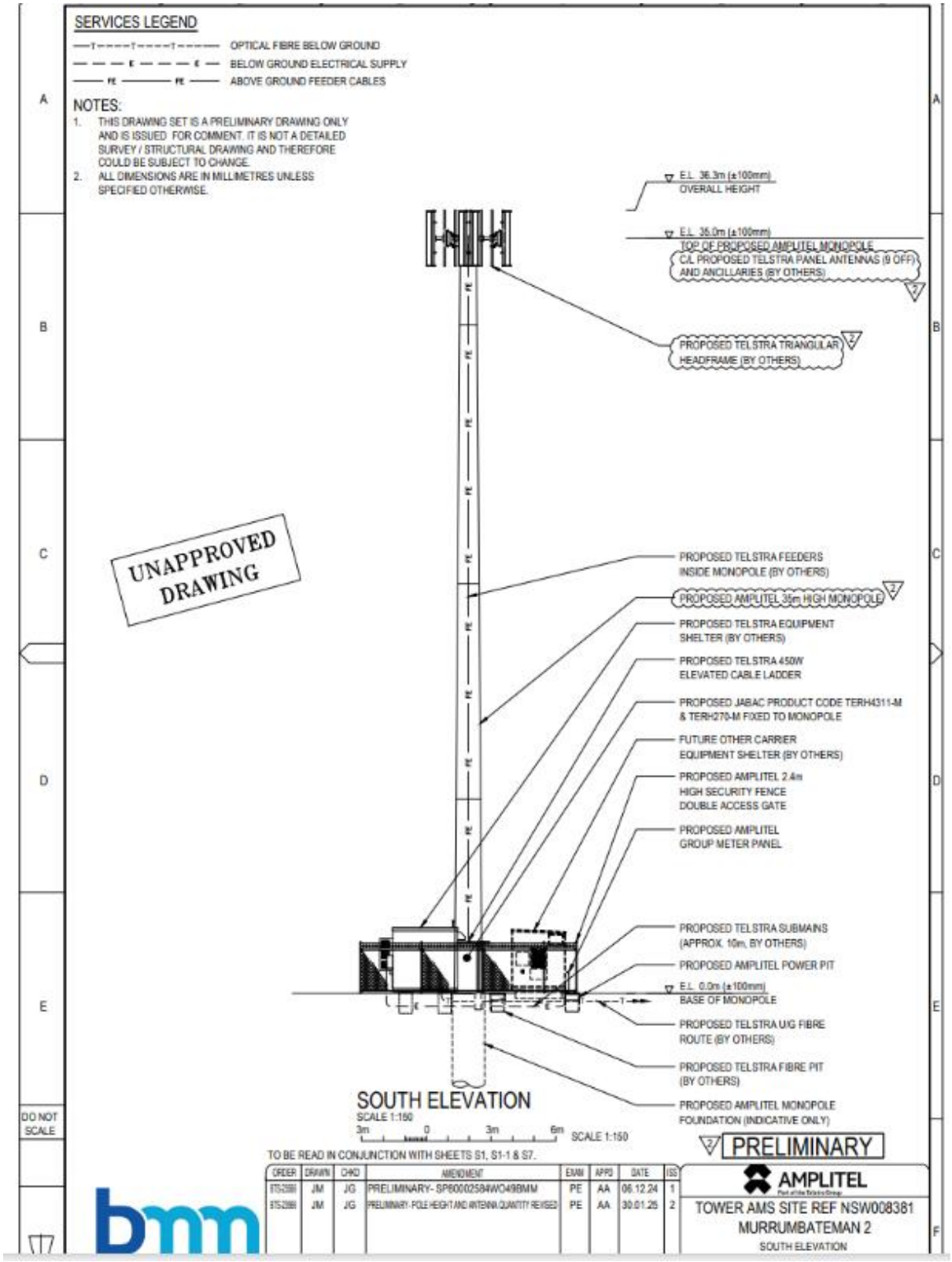

Figure 3: *Elevation of the proposed facility*

3.2 Traffic, access and parking

The existing access to the telephone exchange will be utilised. Furthermore, a new Amplitel dry weather only access route is proposed to access the facility.

Once operational there will be no measurable impact on the road network and will not compromise the safety, efficiency, function or convenience of use or capacity of the operation of the existing and future road hierarchy. The facility will be unstaffed and operated remotely. Only occasional access is required for maintenance up to approximately three times per year by one passenger vehicle for approximately one day. Traffic management will be utilised when occasional heavy vehicle access is required during construction or when upgrading or replacing equipment on the monopole.

3.3 Construction and noise

There will be minimal noise and vibration emissions associated with construction of the proposed facility. Noise generated during the construction phase is anticipated to be of short duration and accord with the standards outlined in the relevant EPA guidelines. Construction works are planned only to occur between the hours of 7.00am and 5.00pm or otherwise in accordance with Council's conditions.

3.4 Utility services

Power and fibre to the proposal will be sourced via a new underground route. The exact details will be confirmed during the detail design stage of the project. No tree clearing is required to gain access to the power supply or transmission.

3.5 Maintenance

Once operational, the facility is designed to function on a continuously unstaffed basis and will typically only require maintenance works up to three times per year, for approximately one day.

3.6 Ongoing Use

We acknowledge that Yass Valley Council is proposing the **North Murrumbateman Masterplan.** The proposed facility will support council's masterplan by providing essential mobile service to the future land uses.

4.0 Site Description and Surrounding Locality

4.1 Site Location and Surrounds

The subject site is located at an existing telephone exchange at 9 East St, Murrumbateman NSW 2582 (Lot A On Deposit Plan 948768). The exact location of the proposal is at GDA94 Coordinates -34.97277, 149.02998. The land is zoned as RU5 – Village under the **Yass Valley Local Environmental Plan 2013**

The proposed facility is currently surrounded by predominantly rural-residential development and farmland.

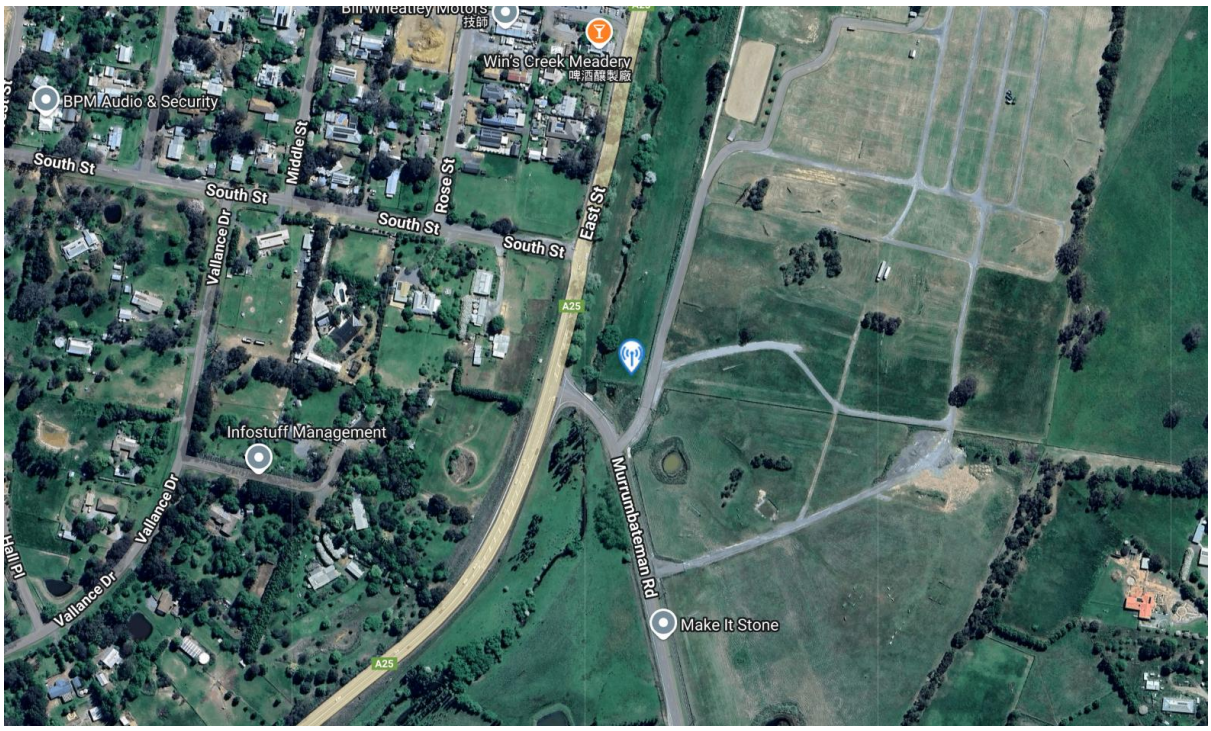

Figure 4: *Site location. (Source: Google Earth)*

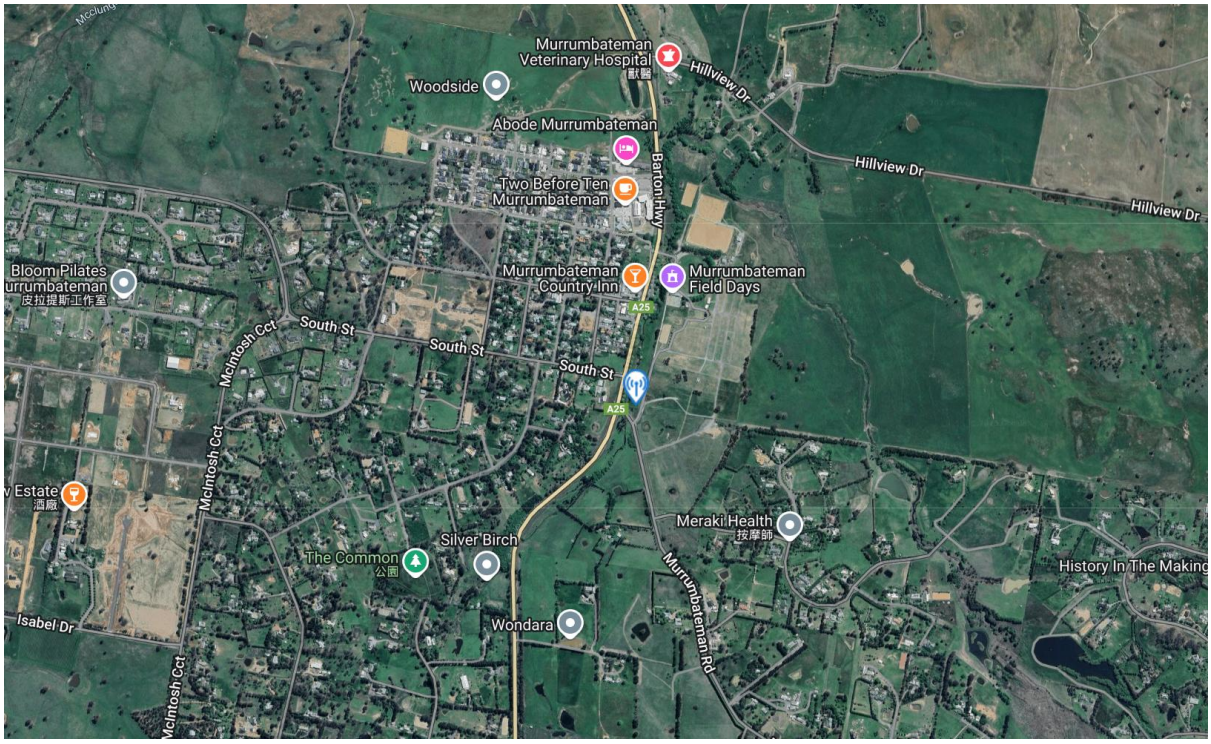

Figure 5: *Site location in context of the Murrumbateman Area. (Source: Google Earth)*

The Local Government Authority for the proposal Is Yass Valley Council and the principal planning instrument at the location is the **Yass Valley Local Environmental Plan 2013**. The site is zoned RU5 – Village under the **Yass Valley Local Environmental Plan 2013**. Table 3 provides a summary of the site details. **Figure 6** illustrates the land zoning.

Figure 6: *Land Zoning. (Source: NSW Planning Portal)*

Table 3: Proposed Site Details

Details	Comment
Street Address	9 East Street Murrumbateman 2582
Legal Description	Lot A DP948768
Total Site Area	2.428 ha
Proposed Development Footprint	100m^2
Zone	RU5 – Village
Planning Instrument	**Yass Valley Local Environmental Plan 2013**
Current Use	Rural residential
Access	New and existing access

The proposed telecommunications facility is sited at an elevation of approximately 571m AHD. **Figures 7 and 8** illustrate the surrounding land uses, existing infrastructure and natural features relative to the proposed facility location (the proposed location is shown by the white mark).

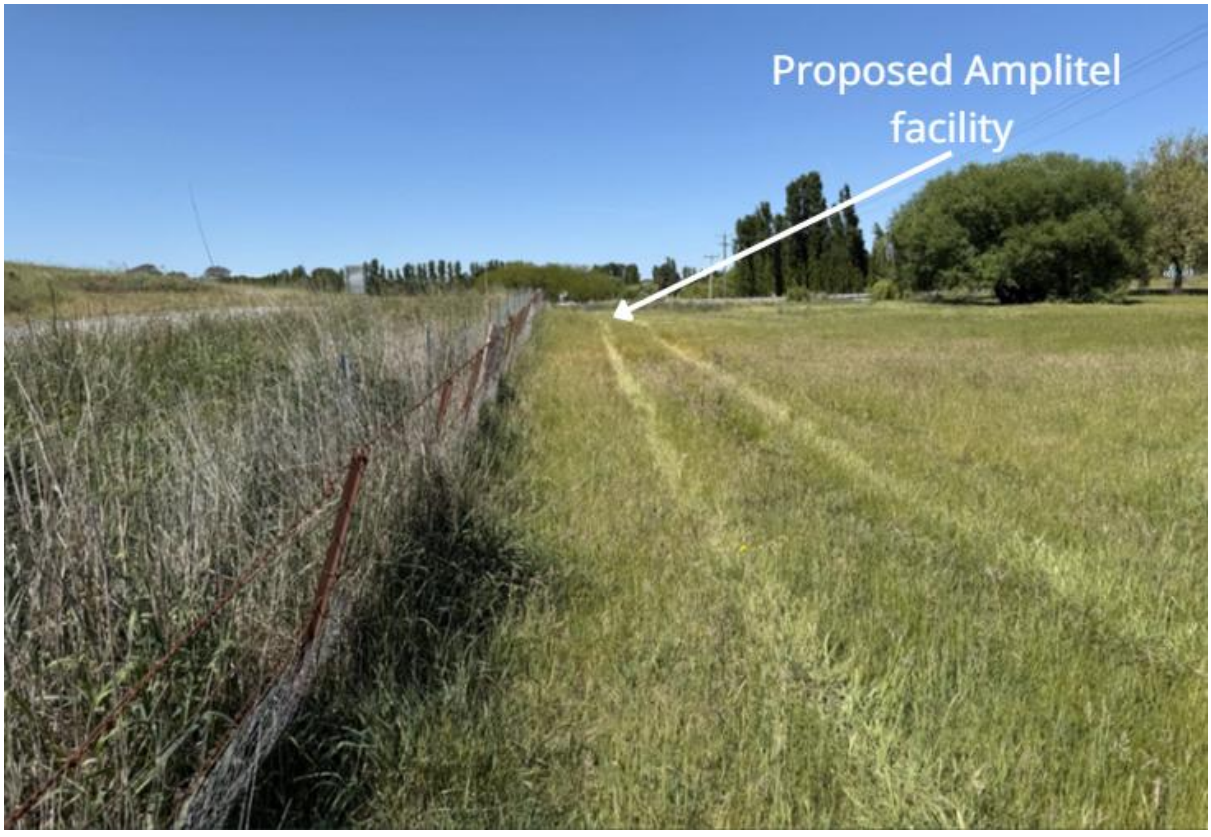

Figure 7: *View looking south towards the proposed facility location from East Street (source: BMM)*

Figure 8: *View looking West towards proposed facility standing on lot A DP 948768 (source: BMM)*

5.0 Consultation

5.1 Council

No formal consultation was undertaken with Yass Valley regarding this application. Our due diligence identified the below key issues:

- Terrestrial protection overlay;
- Local heritage listing;

This report has included a detailed assessment of the permissibility of the proposal under the relevant planning instrument. Justification of the suitability of the proposal at this location has been provided along with an assessment of the impacts on visual amenity. A detailed assessment of the items identified above has also been undertaken.

5.2 Community

Due to the rural-urban nature of the area and the fact significant development is yet to occur, it is considered Council's standard notification as per the EP&A Act requirements is sufficient. Information regarding the proposal will also be made available online via the RFNSA website.

5.3 Other Stakeholders

A local community may often have concerns about particularly sensitive locations in the vicinity of the proposal e.g. schools, childcare centres and aged care facilities.

In this instance, there are no particularly sensitive locations within proximity to the proposal.

6.0 Relevant Local, State and Federal Legislation

The following legislation is relevant to assessment of the proposed telecommunications facility;

- Telecommunications Act 1997 (the Act);
- Telecommunications (Low-impact Facilities) Determination 2018 (the Determination);
- Telecommunications Code of Practice 2021 (the Code);
- Industry Code C564:2020 - Mobile Phone Base Station Deployment (the Deployment Code);
- Environment Planning and Assessment Act 1979 (the EP&A Act);
- State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP 2021);
- NSW Telecommunications Facilities Guideline, Including Broadband July 2022 (the Guideline);
- Yass Valley Local Environmental Plan 2013
- Yass Valley Council Development Control Plan 2024
- South East and Tablelands Regional Plan 2036

6.1 Federal Legislation

6.1.1 Telecommunications Act 1997

The installation of certain telecommunications facilities (as defined in the *Telecommunications Act 1997)* is regulated by the Australian Communications and Media Authority (ACMA) under the *Telecommunications Act 1997*. The legislative requirements are discussed below in further detail.

The *Telecommunications Act 1997 (TA)* came into operation in July 1997. This legislation establishes the criteria for 'low impact' telecommunication facilities. If a proposed facility satisfies the requirements of a 'low impact' facility, the development is exempt from the planning approval process.

Part 1 of Schedule 3 of the *TA* authorises a carrier to enter on land and exercise any of the following powers:

- Inspect the land;
- Install a facility; and to
- Maintain a facility.

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

- the Carrier being authorised to do so by a Facility Installation Permit, or the facility being a low-impact facility (as defined by the Telecommunications (Low-Impact Facilities) Determination 1997 (as amended)), or
- the facility being temporary and used for a defence organisation for defence purposes, or
- if other conditions are satisfied in relation to the facility concerned.

As the proposal involves the installation of a 35-meter monopole, it does not constitute a low-impact facility under the *Telecommunications (Low-Impact Facilities) Determination 2018* (as amended).

As the proposed facility does not meet the criteria mentioned above, the applicant is not empowered to undertake the proposed works without approval under New South Wales legislation and must obtain development consent from **Yass Valley Council.**

6.1.2 Telecommunications Code of Practice 2021

The Telecommunications Code of Practice 2021 (TCP) is made under Schedule 3 of the Telecommunications Act 1997. The TCP ensures good practice measures under which a Carrier must operate and outlines conditions which carrier conduct must adhere to.

This proposal has taken into consideration the requirements of carriers in the best practice conditions of the TCP and thus includes the best design, planning and location measurements to ensure the development is in accordance with sections 2.11 and 3.11 of the Act.

6.1.3 Telecommunications (Low-Impact Facilities) Determination 2018

The Telecommunications (Low-impact Facilities) Determination 2018 was made under subclause 6 (3) of Schedule 3 of the *TA*. The Act outlines under subclauses 6 (4), (5) and (7), that certain facilities cannot be low-impact facilities, these include the following:

- Designated overhead lines;
- A tower that is not attached to a building;
- A tower attached to a building and more than 5 metres high;
- An extension to a tower that has previously been extended; and
- An extension to a tower, if the extension is more than 5 metres high.

The proposal is not classed as a low-impact facility under the Determination as it involves the installation of a 35-metre monopole and is therefore subject to the assessment under the **Yass Valley Local Environmental Plan 2013**

6.1.4 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 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. No consultation external to that undertaken in the Development Application process is required under the Code.

6.2 New South Wales State Regulatory Framework

The proposed facility is subject to assessment under the following state environmental planning instruments and regulations.

6.2.1 Environment Planning and Assessment Act

This Statement of Environmental Effects (SEE) provides a summary of the matters for consideration set out in Section 4.15 of the Environmental Planning and Assessment Act 1979. Clause (1) provides that:

"In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

(a) the provisions of:

(i) any environmental planning instrument, and

(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and

(iii) any development control plan, and

…

(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,

(c) the suitability of the site for the development,

(d) any submissions made in accordance with this Act or the regulations,

(e) the public interest."

The sections within this SEE address each of the matters for consideration noted above. Any Environmental Planning Instrument (EPI) in relation to the development application including the Yass Valley Local Environmental Plan 2013 *and* the *State and Environmental Planning Policy (Transport and Infrastructure) 2021*.

6.2.2 State Environmental Planning Policy (Transport and Infrastructure) 2021

Given that the development is for a new mobile phone base station the primary legislation relevant to the proposal is *State Environmental Planning Policy (Transport and Infrastructure) 2021* – "TISEPP 2021". Items of compliance relating to the application and assessment of the proposal against the TISEPP have been outlined below.

Certain provisions are afforded within the TISEPP in relation to development of telecommunications infrastructure within New South Wales. *Division 21 Telecommunications and other communications facilities* and *Schedule 4* of the TISEPP stipulate ways in which telecommunications development can be undertaken in any zone (with consent) and outlines prescriptive controls for works which can be installed as exempt or complying development.

This proposal however cannot be undertaken as exempt or complying development due to the nature and location of the proposal. As such, a development application is being sought with Yass Valley Council in accordance with clauses 2.143 and 2.143(2) of the *SEPP (Transport and Infrastructure)* as outlined below:

Clause 2.140 of the *SEPP (Transport and Infrastructure) 2021* defines a "Telecommunications Facility" as:

- any part of the infrastructure of a telecommunications network, or

- any line, cable, optical fibre, fibre access node, interconnect point, equipment, apparatus, tower, mast, antenna, dish, tunnel, duct, hole, pit, pole or other structure in connection with a telecommunications network, or
- any other thing used in or in connection with a telecommunications network.

Clause 2.143 states that:

"Development for the purposes of telecommunications facilities, other than development in clause 2.141 or development that is exempt development under clause 2.20 or 2.144, may be carried out by any person with consent on any land."

Through the provisions outlined above, telecommunications facilities are permissible in any zone, including the RU5 - Village Zone on the condition that consent is obtained by the relevant determining authority, in this instance being Yass Valley Council.

Furthermore, Clause 2.143(2) states:

"Before determining a development application for development to which this clause 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 Director-General for the purposes of this clause and published in the Gazette."

6.2.3 NSW Telecommunications Facilities Guideline, Including Broadband (October 2022)

This proposal is consistent with the guidelines concerning site selection, design and construction as is stipulated within the *NSW Telecommunications Facilities Guideline, Including Broadband (October 2022)*. Compliance with the requirements specified within this guideline is addressed in Table 4 below.

Table 4: Responses to principles 1-5 Section 3 of the NSW Telecommunications Facilities Guideline, Including Broadband

Principle 1 – A Telecommunications Facility should be sited in order to minimise visual impact:	
Principle, as outlined:	**Response:**
(a) 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.	(a) Not applicable- The proposal is a new free-standing monopole.
(b) Minimise the visual impact of telecommunications facilities, reduce visual clutter (particularly on tops of buildings) and ensure physical dimensions (including support mounts) are sympathetic to the scale and height of the building to which it is to be attached and to adjacent buildings.	(b) Complies – The proposed facility has been positioned and designed so that it integrates well within its rural setting. From the surrounding locations assessed, visual integration is offered by the following key elements: - The use of a monopole structure as a measure to reduce the visual bulk and promote sky-lining (visual prominence against the backdrop of the sky) of the facility. - A monopole structure is considered a preferable design solution by industry standards given its reduced visual impact from both a distance and within proximity, whilst maintaining a high-quality service provision.

	- A compact headframe design to reduce the bulk and scale of the proposed facility. - The facility will use neutral finishes to help minimise visual impact. - The proposed facility will be partially screened by existing vegetation. As the design demonstrate, the proposed facility has been well sited within the context of surrounding land uses and will provide a successful balance between the provision of essential infrastructure and a low-level impact on amenity. The proposed facility will provide enhanced social and economic benefit, and improved safety and accessibility to the community without compromising the amenity, function and ongoing use and enjoyment of the surrounding precinct.
(c) If a telecommunications facility protrudes from a building or structure and is predominantly seen against the sky, either match the prevailing colour of the host building or structure or use a neutral colour such as pale grey.	(c) Complies - The proposal is a standalone structure and will be finished in standard grey colours or as conditioned by Council.
(d) Where possible and practical, screen or house ancillary facilities using the same colour as the prevailing background and consider using existing vegetation or new landscaping.	(d) Complies - Ancillary equipment associated with the facility will be installed at equipment shelter at ground level. The shelter will be painted pale eucalypt or as conditioned by Council. Pale eucalypt is considered a neutral colour that blends in well with vegetation.
(e) Locate and design a telecommunications facility in a way that responds to its setting (rural, residential, industrial or commercial).	(e) Complies - The site is located in a rural-residential setting and has been designed and sited to respond to its surrounding urban context.
(f) Site and design a telecommunications facility located on or adjacent to a listed heritage item or within a heritage conservation area with external colours, finishes and scale sympathetic to the heritage item or conservation area.	(f) Applicable - The site is in proximity to local heritage – memorial trees. However, the proposed facility will not damage the existing heritage item and its historical value
(g) Locate telecommunications facilities to minimise or avoid obstructing significant views of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land.	(g) Applicable – The proposed facility sits behind the memorial trees whether viewed from public or private land
(h) Consult with relevant council when proposing pruning, lopping or removing any tree or vegetation. Obtain a tree preservation order, permit or development consent if required	(h) Complies – No tree clearing is required for the proposal.
(i) Remove redundant telecommunications facilities and restore the site to the condition it was in prior to the facility's construction.	(i) Not applicable. The proposal is for a new telecommunications facility.
(j) Remove redundant components of existing facilities after upgrades.	(j) Not applicable. The proposal is for a new telecommunications facility.
(k) Where possible, consolidate telecommunications facilities to reduce visual clutter and work with other users on co-location sites to minimise cumulative visual impact.	(k) Not applicable. This is a new telecommunications facility. However, the proposed monopole has been designed with the structural capacity to accommodate other telecommunications carriers. The proposed compound also has sufficient space for other carrier equipment cabinets

(l) Accord with all relevant industry design guides when siting and designing telecommunications facilities.	(l) Complies – Amplitel has followed the precautionary approach in the selection and design of this proposal. The siting and design of the proposed telecommunications facility is wholly compliant with the New South Wales Telecommunications Facility Guideline,
(m) Assess potential visual impact in alternative site assessments.	(m) Complies – The visual impact of other proposals has been assessed and the selected candidate is considered prudent.

Principle 2 – Co-locate telecommunications facilities wherever practical	
Principle, as outlined:	**Response:**
(a) As far as practical, locate telecommunications lines underground or within an existing underground conduit or duct.	(a) Complies - All proposed conduit will be installed underground.
(b) Where practical, co-locate or attach overhead lines, antennas and ancillary telecommunications facilities to existing buildings, public utility structures, poles, towers or other radiocommunications equipment to minimise clutter	(b) Complies - There are no suitable co-location opportunities within the subject area as outlined in Section 2.5 of this report.
(c) Consider extending an existing tower as a practical co-location solution to new towers.	(c) Not applicable. - The paucity of telecommunications infrastructure in the area means this is not practical.
(d) Demonstrate that co-location is not practicable1 if choosing not to co-locate a facility.	(d) Complies – Co-location options have been assessed as not suitable for the proposed facility as outlined in Section 2.3 of this report.
(e) If choosing to co-locate, design, install and operate a telecommunications facility so that resultant cumulative levels of radio frequency emissions are within the maximum human exposure levels set out in RPS S-1.	(e) Complies - The proposed site does not involve a co-location on an existing telecommunications facility. The proposed new facility will operate within acceptable levels of radio frequency emissions / within the maximum human exposure levels set out in the Radiation Protection Standard

Principle 3 – Meet health standards for exposure to radio emissions	
Principle, as outlined:	**Response:**
(a) Design, install and operate a telecommunications facility so that maximum human exposure levels to radiofrequency emissions comply with RPS S-1 (see Appendix B).	(a) Complies - It is the legal obligation for any carrier to ensure that any telecommunications equipment is operated within the human exposure limits within the ARPANSA Radio Protection Standard. The predicted maximum human exposure levels have been calculated to be 2.18%, well within the allowable public exposure limit. Refer to **Appendix B** – Environmental EME Report.
(b) Using the format required by ARPANSA, report on predicted levels of EME surrounding any development covered by the Industry Code C564:2020 Mobile Phone Base Station Deployment, and how the development will comply with ACMA safety limits and RPS S-1.	(b) Complies - An EME Environmental Report has been included within ***Appendix B*** of this document. The EME Environmental Report is in accordance with Australian safety standard called RPS S-1 or Radiation Protection Series – S1 (Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz). Additionally, the EME Environmental Report is a publicly accessible document which can be retrieved from: www.rfnsa.com.au/2582034.

Principle 4 – Minimise disturbance and risk, and maximise compliance	
Principle, as outlined:	**Response:**
(a) Ensure the siting and height of a telecommunications facility complies with the of the Commonwealth Civil Aviation Regulations 1998 and Airports (Protection of Airspace) Regulations 1996. Avoid penetrating any obstacle limitation surface (OLS) shown on a relevant OLS plan for an aerodrome or airport (as reported to the Civil Aviation Safety Authority) within 30 km of the proposed development.	(a) Complies - The proposal is compliant with the Civil Aviation Regulations 1988 and the Airports (Protection of Airspace) Regulations 1996. Should the assessing authority require it, the proposal will be referred to CASA for their assessment.
(b) Ensure no adverse radio frequency interference with any airport, port or Commonwealth defence navigational or communications equipment, including the Morundah Communication Facility, Riverina.	(b) Complies - The proposed equipment at the subject site is licensed as per ACMA regulations. As a result, there is to be no interference with other civil and military communications facilities.
(c) Carry out the telecommunications facility and ancillary facilities in accordance with any manufacturer's installation specifications.	(c) Complies - The proposed equipment is to be installed as per the manufacturer's specifications and relevant Australian engineering standards.
(d) Protect the structural integrity of any building or structure on which a telecommunications facility is erected.	(d) Not applicable - Proposal is a standalone structure.
(e) Erect the telecommunications facility wholly within the boundaries of a property as approved by the relevant landowner.	(e) Complies – Amplitel has entered into an agreement with the landowner to construct a new telecommunications facility. The new structure will not encroach on surrounding property boundaries.
(f) Ensure all construction of a telecommunications facility accords with Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom 2004), or its replacement.	(f) Complies - The construction of the proposal will adhere to and comply with the regulations set out within the Blue Book – 'Managing Urban Stormwater: Soils and Construction' (Landcom 2004).
(g) Mitigate obstruction or risks to pedestrians or vehicles caused by the location of the facility, construction activity or materials used in construction.	(g) Complies - The site is not generally accessible by pedestrians or vehicles and will be fenced during construction.
(h) Where practical, carry out work at times that minimise disruption to adjoining properties and public access and restrict hours of work to 7.00am and 5.00pm, Mondays to Saturdays, with no work on Sundays and public holidays.	(h) Complies - Construction works will be conducted between 7.00am and 5.00pm, Mondays to Saturdays or as per the recommended hours stipulated by Council. Consultation with council will be undertaken throughout the construction process.
(i) Employ traffic control measures during construction in accordance with Australian Standard AS1742.3-2002 Manual of uniform traffic control devices – Part 3: Traffic control devices for works on roads.	(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.
(j) Guard open trenching in accordance with Australian Standard Section 93.080 – Road Engineering AS1165 – 1982 – Traffic hazard warning lamps.	(i) Complies - Open trenching for the installation of underground power and fibre will be executed in compliance with the Australian Standard Section 93.080 – Road Engineering AS1165 – 1982 – Traffic hazard warning lamps

(k) Minimise disturbance to flora and fauna and restore land to a condition similar to its condition before the work was carried out.	(k) Complies - The proposal is a small-scale development that will be wholly located within the proposed new compound. The impact on flora is considered negligible. An assessment of this is included in Section 7.3 below. All land will be restored to a condition that is similar to its condition before the work was carried out.
(l) Identify any potential impacts on threatened species and communities in consultation with relevant authorities and avoid disturbance to identified species and communities where possible.	(l) Complies – The proposal has been assessed as having minimal impact on threatened species and communities as detailed in Section 7.3.
(m) Identify the likelihood of harming an Aboriginal place and/or Aboriginal object and obtain approval from the Department of Premier and Cabinet if the impact is likely, or Aboriginal objects are found.	(m) Not Applicable - No items or areas of Aboriginal significance were identified on the proposed allotment. Refer to **Appendix C** for Aboriginal Heritage Information (AHIMS) report.
(n) Reinstate, at your expense, street furniture, paving or other facilities removed or damaged during construction to at least the same condition as that prior to installation.	(n) Complies - The proposal will not impede on any street furniture, paving or other existing facilities. If any street furniture, paving or other existing facilities need to be moved or are damaged, Yass Valley Council will be consulted with, and any necessary approvals obtained before anything is removed.

Principle 5 – Undertake an alternative site assessment for new mobile phone base stations	
Principle, as outlined:	**Response:**
(a) Include adequate numbers of alternative sites in the alternative site assessment as a demonstration of good faith.	(a) Complies – A total of four (4) candidates were considered for the proposed facility.
(b) In addition to the new site selection matters in Section 4 of the Industry Code C564:2020 Mobile Phone Base Station Deployment: • *only include sites that meet coverage objectives, and that have been confirmed as available, with an owner agreeable to having the facility on their land* • *if the preferred site is a site owned by the Carrier, undertake a full assessment of the site* • *indicate the weight placed on selection criteria* • *undertake an assessment of each site before any site is dismissed.*	(b) Complies – The site selection process accords with the Industry Code and relevant industry requirements.

6.2.4 Yass Valley Local Environmental Plan 2013

The proposal is subject to land-use controls under the Yass Valley Local Environmental Plan 2013. Under the LEP, the proposed site is zoned RU5 – Rural. The proposed facility is considered prohibited unless consent from council is obtained.

The subject zoning is shown in **Figure 9** below. The proposal has been assessed against the objectives of the zone below in Table 5.

***Figure 9**: Land zoning of subject site – RU5 – Village, Lot A DP 948768 (Source: NSW Planning Portal)*

Table 5: Objectives of RU5 - VIllage

RU5 – Village	
Objective	**Compliance:**
• *To provide for a range of land uses, services and facilities that are associated with a rural village*	Complies - The proposal for a telecommunications facility will provide essential mobile phone coverage *associated with a rural village*
• *To ensure that development is compatible with village character and amenity.*	Complies – The proposal adopts a streamlined design and is maintained at a minimal height, preserving the *village character and amenity.*
• *To ensure that development is provided with an adequate water supply and the disposal of sewage.*	N/A

The proposed infrastructure will result in benefits to residents, businesses and commuters through the area particularly in Murrumbateman.

The proposed location is previously disturbed meaning the development will not have any adverse impacts on flora or fauna nor will it fragment, disturb or diminish the local ecology.

In summary, the proposal meets the above objectives of the RU5 Zone under the LEP as it:

- Is technically feasible in this location and can achieve Telstra's network objectives for the area, resulting in much improved telecommunications services for residents and businesses.
- The site is located within an RU5 – Village 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 or future purposes. The small-scale nature of the proposal is suitable for the location.
- Improves mobile telecommunications services to support the current and future growth and development of the area.

6.2.5 South East and Tablelands Regional Plan 2036

The South East and Tablelands Regional Plan 2036 serve as a blueprint for the next two decades - reflecting community and stakeholder aspirations and opportunities for balanced growth, while protecting the region's amazing natural environment. An assessment against the South East and Tablelands Regional Plan 2036 Plan is provided below.

Table 6: Assessment against objectives of the South East and Tablelands Regional Plan 2036

South East and Tablelands Regional Plan 2036	
Objective, as outlined:	**Response:**
1. A connected and prosperous economy	Complies – the proposal provides essential mobile coverage for business to stay connected and prosper
2. A diverse environment interconnected by biodiversity corridors	Not applicable – the proposal does not relate to A diverse environment interconnected by biodiversity corridors. It will not have adverse impact on local biodiversity
3. Healthy and connected communities	Complies – The proposed facility provides essential mobile coverage for the operation of transport and health care service
4. Environmentally sustainable housing choices	Not applicable – The location of the proposed facility is primarily guided by the desired area of radiofrequency improvement.

Table 7: Assessment against Appendix: Neighbourhood Planning Principles of the South East and Tablelands Regional Plan 2036

Appendix: Neighbourhood Planning Principles of the South East and Tablelands Regional Plan 2036	
Objective:	**Compliance:**
1. Public transport networks that link frequent buses into the rail system.	Complies – The proposed facility supports public transport network by providing essential mobile coverage
2.A range of land uses to provide the right mix of houses, jobs, open space, recreational space and green space.	Not applicable – the proposal is not for housing or recreational purpose

3. Easy access to major town centres with a full range of shops, recreational facilities and services along with smaller village centres and neighbourhood shops.	Not applicable – However the proposal comprises telecommunications infrastructure which will help in creating vibrant and successful centres.
4. Jobs available locally and regionally, reducing the demand for transport services	Not applicable – the proposal is not for providing job opportunities
5. streets and suburbs planned so that residents can walk to shops for their daily needs.	Not applicable – However the proposal will improve connectivity and overall amenity.
6. A wide range of housing choices to provide for different needs and different incomes. Traditional houses on individual blocks will be available along with smaller, lower maintenance homes, units and terraces for older people and young singles or couples	Not applicable – The proposal is not for housing purpose
7. Housing diversity can be facilitated by providing a number of purpose-designed smaller lots and dwellings.	Not applicable – The proposal is not for housing purpose
8. New housing developments are to provide a proportion of adaptable housing to further increase housing choice across the Region to cater for the ever changing needs of its residents.	Not applicable – The proposal is not for housing purpose
9. Conservation lands in and around the development sites, to help protect biodiversity and provide open space for recreation.	Not applicable – However the proposal will not damage local biodiversity and reserve open space for recreation
10. Minimise the negative impacts on the natural water cycle and protect the health of aquatic systems, for example, through Water Sensitive Urban Design principles.	Not applicable – the proposal has no effect on water cycle or resources

6.2.6 Yass Valley Council Development Control Plan 2024

The Yass Valley Council Development Control Plan 2024 guides and facilitates permissible development accordingly. This Plan outlines Council's standards for new development and seeks to achieve the objectives of the land use zones as prescribed in Yass Valley Local Environmental Plan 2013. An assessment against the Yass Valley Council Development Control Plan 2024 Plan is provided below.

Table 8: Assessment against Aims and Objectives: Yass Valley Council Development Control Plan 2024

Yass Valley Council Development Control Plan 2024	
Objectives:	**Compliance:**
1. provide guidance on acceptable and appropriate development control standards for new development within the Yass Valley Local Government Area;	Not applicable

2. Increase public awareness of hazards and to ensure that essential services and land uses are planned in recognition of the potential hazards;	Complies – the proposal is not situated in bush fire prone, flood hazard prone or landslide prone area
3. ensure that only appropriate development occurs in areas affected currently impacted by, and likely to be impacted by future, hazards to ensure that risk to life and property is minimised by providing early, safe evacuation routes, buildings that are designed to withstand the hazard impacts	Complies – The proposal provides essential service during hazards
4. ensure that development occurs in a manner that is consistent and sustainable	Complies – the proposal support the sustainable growth of local area
5. encourage sustainable development that is designed for a changing climate including extreme weather events	Complies – Reliable mobile services support innovation and commerce.
6 support development that minimise waste and resource consumption; .	Complies – The proposal operates at a non-man basis and with minimal energy
7. provide for a variety of adaptable housing types to meet the changing demographics of Yass Valley;	Not applicable – the proposal is not for housing purpose
8. promote high standards of development that provide positive planning outcomes on individual sites to the benefit of the wider community by encouraging new development that is responsive to the site characteristics, streetscape and neighbourhood character in which it is located	Complies – the proposal benefits the wider community and adopt a steam-lined design that minimized visual impact
9. encourage innovative design that achieves a high level of sustainability and is adaptable to changing climate conditions.	Not applicable

7.0 Assessment of Effects

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
- Heritage
- Ecology
- Noise and Vibration
- Traffic Generation
- Flooding
- Bushfire Prone Land
- Waste Management
- Soil Erosion and Landscaping provision
- Social and Economic Impacts
- Contaminated Land Assessment
- Overshadowing
- Health and Safety

This section takes into considerations matters of relevance to the proposed development which is inclusive of issues relating to the environmental impacts of the proposal on the built and natural form, as well as the social and economic impacts the telecommunications facility will have on the locality.

As the proposed telecommunications facility is to be built in a rural-residential setting, it is believed that the proposed new monopole will not result in significant negative environmental impacts. The site and general area has already previously been disturbed and no extensive vegetation removal is proposed. It is also considered the proposal will not negatively impact the future character of the area due to its small-scale and it will be constructed in a manner that it can be removed should the need arise.

The following environmental, social, and economic considerations have been made in reference to the proposal:

7.1 Visual Impact Assessment

With over 16,000 base stations in operation around Australia, panel antennas, dishes and other relevant equipment have become part of the urban landscape. Telecommunications facilities aren't only operated by mobile phone networks but may also include critical infrastructure assets employed by the emergency services, rail and other public utility authorities to ensure the active and safe operation of their respective duties.

Whilst undertaking site selection for a new base station facility in the locality, BMM Group considered the nature of existing land uses, visual impact and aesthetics of its facility on the surrounding environment. The facility has been sited and designed to maximise visual integration in the locality and ensure that the amenity of existing residents is not compromised.

Amplitel seeks to propose facilities in locations that have the least amount of impact possible on a community, while being able to deliver a high-quality service. However, it is recognised that, similar to all forms of development, telecommunications facilities have a visual effect. This visual effect can be attributed to two unavoidable characteristics of mobile phone base stations:

- They are structures which generally protrude above other structures as they need to have a clear "line of sight" to the devices they are servicing in order to be of benefit to the community; and
- They need to be located at suitable heights in order to operate effectively.

Freestanding mobile phone base stations are a common feature within urban and rural landscapes. The justification behind the use of a freestanding structure is to provide line of sight coverage within flat and undulating topography. Specific design elements have been included within the planning of the proposed facility, inclusive of:

- A slender monopole design has been utilised at this location (in place of a lattice tower design) creating a minimal profile in the landscape, significantly reducing the bulk of the facility;
- Limiting the height of the proposal to 36.3m (top of antennas) will ensure that the best level of coverage can be provided to the locality, without constructing to a height which would offer no additional benefit to the service area;
- The proposed monopole will sit well within its immediate area adjacent to other telecommunications infrastructure;
- All equipment will be housed within the proposed equipment shelter meaning no additional structures are required;
- The location of the facility adjacent to existing mature trees will provide some screening to the lower part of the facility;

The photomontages of the proposed facility are provided below in Figures 10 and 11. The images help to demonstrate a successful balance between the provision of essential infrastructure and a low-level impact on visual amenity. Matters such as viewing distance, number of viewers and period of view are key factors taken into consideration in the siting and design of the facility and the mitigation of visual impact.

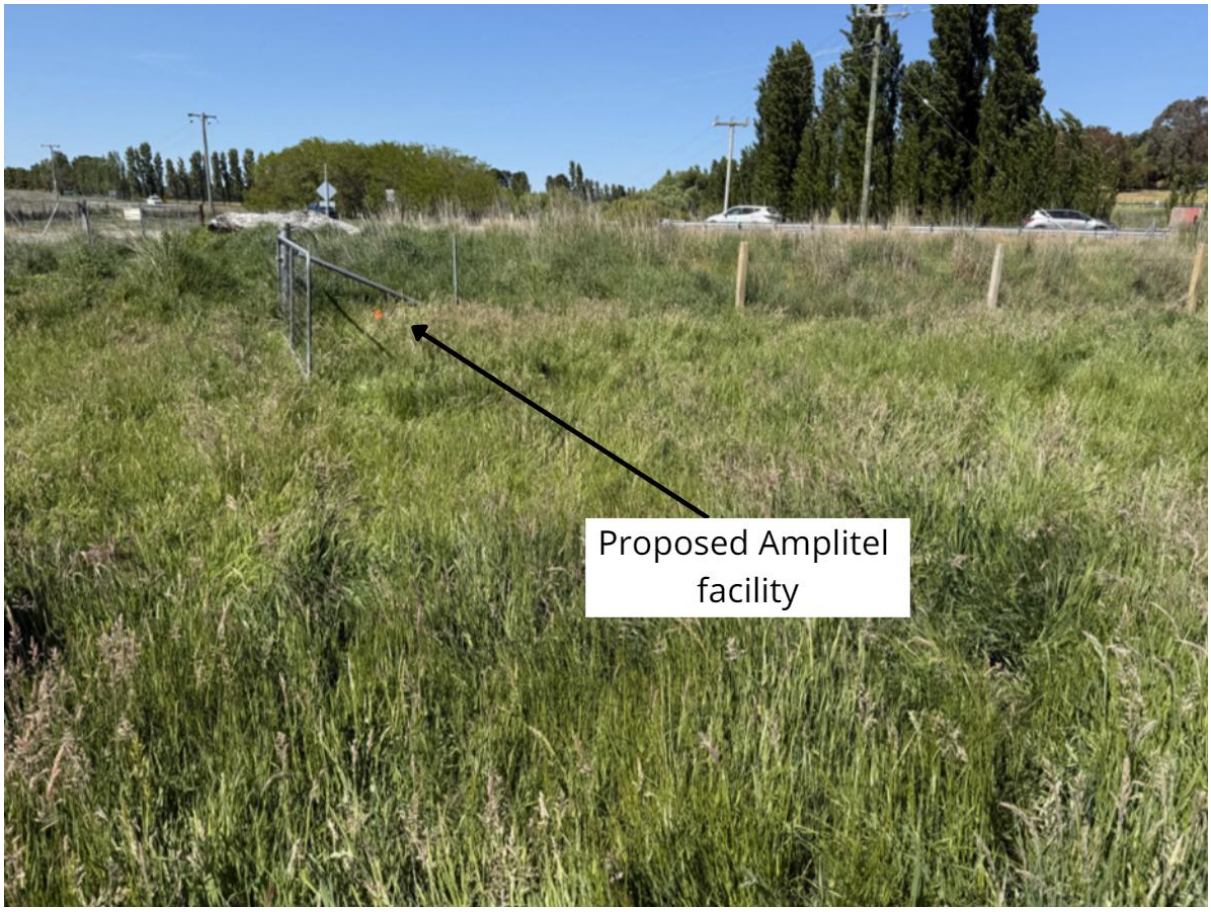

Figure 10 *–looking south to the proposed facility standing on lot A on Plan 948768 (source: BMM)*

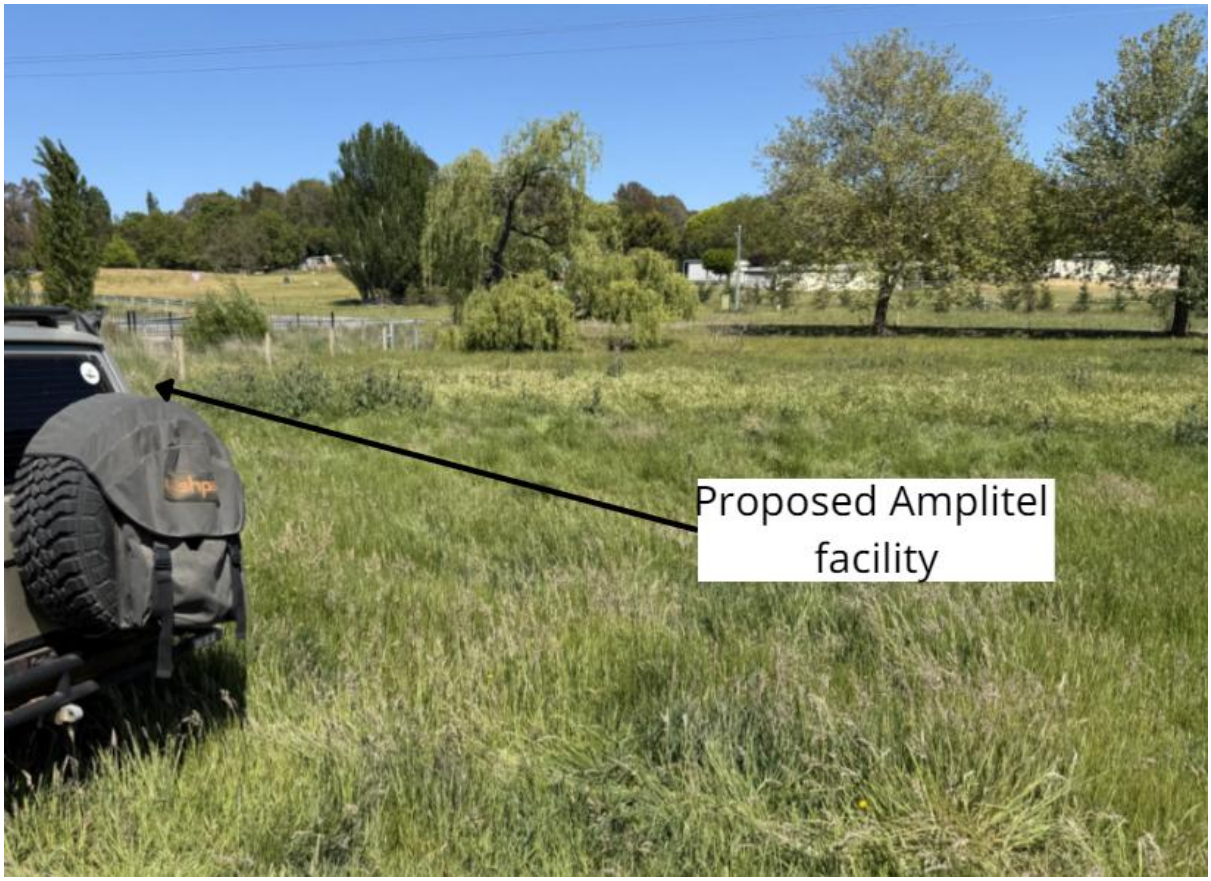

Figure 11 – *Looking west to the proposed facility standing on lot A on Plan 948768 (source: BMM)*

As can be seen in the photo, the visual impact of the proposal is acceptable within the context. Although the proposal will be visible, its overall impact considering the urban context is considered reasonable. Existing vertical electricity infrastructure helps to integrate the proposal and existing mature trees provide screening from certain angles.

Given the current context of the site as being located within a rural residential area with less receptors than a high density residential area, and adjacent to a roadway, the proposed monopole is not anticipated to significantly detract from the visual amenity of the Murrumbateman area. The proposed structure, antennas, and associated equipment will be neutral / non-reflective grey coloured finish (or painted as desired by Council), in an effort to neutralise the facility and blend with the surrounding setting. The proposed landscaping will also assist in minimizing the overall impact of the proposal.

As a result, it is considered the proposal will have minimal adverse impact on visual amenity particularly considering the existing character of the area and the future development planned in the area.

7.2 Heritage

7.2.1 Indigenous Heritage

An AHIMS search was conducted, and the site has not been identified as a site containing items or as an area of Aboriginal Significance (please refers to **Appendix c**).

The site forms part of land that has been previously cleared and disturbed during past land use activities. As such, it is unlikely that the proposed works would encounter any items of indigenous heritage.

Notwithstanding, if any items of indigenous heritage are encountered, works would cease and the NSW Office of Environment and Heritage and the National Parks and Wildlife Service will be contacted.

7.2.2 Non-indigenous Heritage

One local heritage item was identified within the lot where the proposed site situated. The listed heritage item is recorded as - Memorial trees in the Yass Valley Local Environmental Plan 2013. Although the proposed facility shares a same lot with the listed heritage item but it is approximately 50ms away from the memorial trees and therefore there will be no impact to the memorial trees.

Figure 12 – *Heritage map ((Source: NSW Planning Portal)*

7.3 Ecology

Part of the lot which the subject site situated have Terrestrial Biodiversity importance as per the Yass Valley Local Environmental Plan 2013.

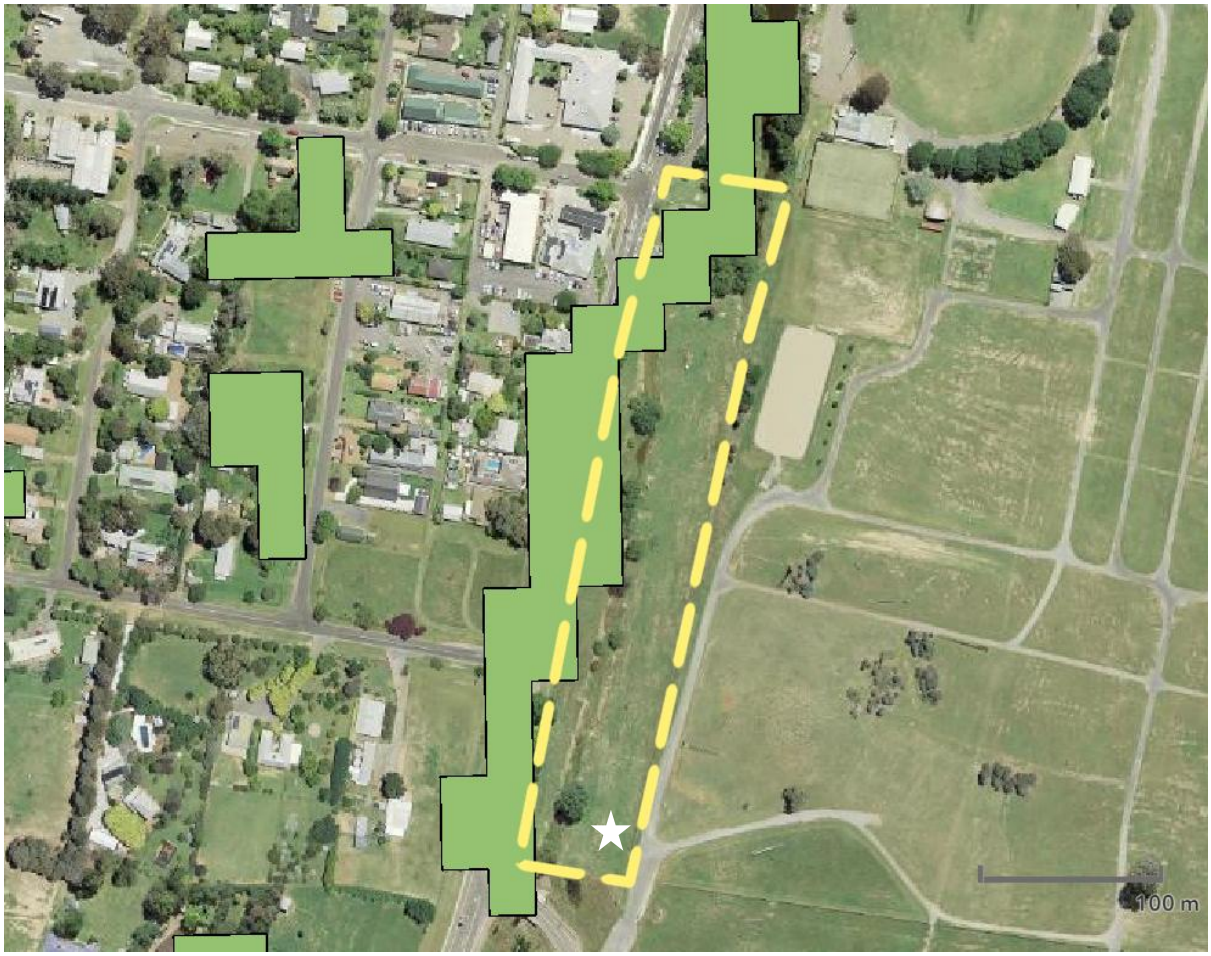

Figure 13 – *Terrestrial Protection Overlay map* ***(Source: NSW Planning Portal)***

However, given that the terrestrial protection overlay does not affect the site and the fact that subject area is already disturbed. The proposal does not involve the removal of any significant or large vegetation or fauna, nor does it constitute any threats to natural species within the locality. Comprehensive preliminary assessment of the nearby natural environment was undertaken within the planning, design and procurement stages of the telecommunications proposal to ensure that there are no disturbances to the natural surrounds and that a marginal amount of ground clearance would be required.

During the construction phase, the subject site area will be concealed by imposing barriers and fencing to repeal any impacts to the surrounding natural environment. This proposal will employ effective measures to mitigate any impacts to surrounding flora, fauna and natural environment. Additionally, once constructed the operation of the telecommunications facility will not result in any negative impacts on the natural environment or the ecology of the locality.

7.4 Noise and Vibration

There will be minimal noise or vibration impacts associated with the operation of the telecommunications tower. The only noise generated during its operational stage is that from the air-conditioning unit servicing the equipment cabin. This air-conditioning unit is similar to those used for the cooling of residential premises, and will comply with the relevant noise emission guidelines.

During construction, there will be some minor excavation works which may introduce noise and vibration for a temporary period. Construction will occur during standard business hours to not disrupt

local residents. Additionally, the site is located in a well-developed area featuring mixed uses where noise is already is being generated, the impact of construction noise will be minimal.

7.5 Traffic Generation

Mobile phone base stations are not significant generators of pedestrian or vehicular traffic. The site has sufficient parking and the creation of parking spaces is not required. During construction, a crane will be required to be temporarily mounted next to the site. It is not anticipated that there will be any adverse disruptions to 9 East St during the construction phase or the ongoing operation of the facility. Traffic control will be used where appropriate.

It is anticipated that the proposed development and ongoing operation would have little impact on the local traffic network, or volumes. The equipment would require maintenance visits approximately 2-3 times per year or as required in the event of an electrical outage or other similar event. Routine maintenance would involve one vehicle per visit and parking would be available close to the subject site for this purpose. Other maintenance would occur on an as-need basis and would not generate significant traffic movements.

Therefore, given the existing nature of the site, the vehicle movements will be consistent with that of the current conditions and any resulting impact on the local road system is considered negligible.

7.6 Flood Prone Land

The site was not identified as being flood prone land under the SEPP or LEP mapping.

7.7 Bushfire Prone Land

The lot which proposed facility situated is partially identified as bush fire prone land – vegetation buffer. However, the subject site is not directly impacted by the bush fire prone layer . The proposed facility operates on a non-man basis and the monopole is constructed from concrete, which is a non-combustible material, the facility will not increase the likelihood of a fire in this location. In the event of a fire the only part of the facility that may cause an issue are the cables and the cable tray, however the site is outside any bushfire prone area.

Figure 14 – *Bush Fire Prone Land map* ***(Source: NSW Planning Portal)***

7.8 Waste 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. Waste will only be generated during the construction phase of the project. It is estimated that during construction, waste would be generated from excavation activities for the supporting foundations of the new structure. All waste generated during construction will either be recycled or lawfully disposed of at an authorised waste transfer facility. The ongoing lifecycle operation of the subject telecommunications facility will not be a generator of waste.

Areas onsite will be allocated for the storage of materials for use, recycling and disposal with considerations to the existing land constraints. Signage will be erected to clearly identify and label the various stockpiles. The storage areas will be barricaded and contained to mitigate any contamination, overflow or windborne litter.

7.9 Soil Erosion and Landscape Provision

Erosion and sediment controls will be implemented prior to the commencement of any construction works and will be maintained throughout the construction phase to manage potential run off, water and air quality during construction.

The development will not induce any soil erosion or siltation. The proposal will immediately reinstate all sediment that is temporarily extracted to install the required structural footings. No external soil or sediment will be introduced to the existing vegetation.

Measures that are to be implemented include:

- All construction plant, equipment and vehicles are to be properly maintained and operated so as to alleviate excessive exhaust emissions;
- Waste loads leaving the site are to be covered at all times;
- Ensuring stockpiles do not exceed 2.5m in height and wetting down any exposed areas and stockpiles as required;
- All dust generating construction activities are to cease during high wind conditions, unless operations can be controlled by localised watering or other control means;
- Scaffolding will include mesh and shade cloth to reduce wind velocity and also to trap any wind-borne objects; andadfield
- All staff and contractors working on site to undergo site induction relating to any specific management issues.

7.10 Social and Economic Impact

Since 2007, the amount of mobile phone subscriptions has exceeded the overall population of Australia. The wider community has seen a general reliance on mobile phone networks for other uses than that of traditional voice calls.

Australia has one of the highest penetrations of "smartphone" usage in the world. A sample study by the Digital Industry Association of Australia has estimated the usage of smartphones at rate of 76% of all mobile phone users. This has seen an ongoing impact and influence as how we conduct business "on the move" – inclusive of checking emails, social networking, e-commerce and browsing the internet. Consumers have an increasing expectation that a reliable, fast and cost-effective mobile phone network can support these activities.

Furthermore, there is a general expectation in the wider community for a dependable and reliable mobile phone network. Telstra have sought to ensure major improvements to their network through 24hr monitoring of network performance. Further to this, mobile phone networks form a vital "first response" tool to emergency situations – hence the importance of carriers to ensure that their infrastructure can be maintained to the highest standards.

7.13 Health and Safety

Telstra understands that some people have genuine concerns about the levels of electromagnetic fields (EMF) that the proposed facility will emit and is committed to addressing those concerns responsibly. EMF is sometimes known as electromagnetic radiation (EMR) or electromagnetic energy (EME). Often, there is a misconception regarding the perceived health risks surrounding mobile phone base stations and Electromagnetic Energy (EME).

Electromagnetic fields are present everywhere in our environment – the earth, sun and ionosphere are all natural sources of EMF. EME levels, which are based on safety guidelines recommended by the International Commission on Non-Ionizing Radiation Protection (ICNIRP), are set by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and regulated by the Federal Government's, Australian Communications and Media Authority (ACMA).

The ACMA's regulatory arrangements require base stations to comply with the exposure limits set in the relevant Australian safety standard; the Radiation Protection Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz (2021), known as RPS S-1 or the ARPANSA Standard. The RPS S-1 series was adopted in 2021 and includes 4G and 5G frequency fields.

EME is non-ionising radiation, meaning that it has insufficient energy to break chemical bonds or remove electrons (ionisation). In contrast, ionising radiation (such as X-rays) can remove electrons from atoms and molecules thus leading to damage in biological tissue (Source: ARPANSA).

In addition, further information is available at: www.telstra.com.au/eme and EMF Explained Series www.emfexplained.info.

There has been extensive research which spans decades into health impacts of radio frequency exposure. This research has been conducted by numerous health authorities and experts around the world, including the WHO, ICNIRP and ARPANSA. We note that APRANSA issued a statement noting

there is a lot of concerning misinformation circulating, urging the public to be cautious of campaigns generating unfounded fear and concern within the community about health effects of 5G or radio waves generally.

Any proposed 5G technology will produce similar EME as the current 3G and 4G base stations and will also operate well below the maximum safety limit. Whilst 3G and 4G antennas typically send signals in a range of directions, 5G antennas will focus the signal only to where they are needed, when they are needed. 5G technology will use higher spectrum frequencies than previous technologies, which means that it will carry more data but won't travel as far as 4G. ARPANSA notes that:

> *"higher frequencies no not mean higher or more intense exposure. Higher frequencies are already used in security screening units at airports, police radar guns to check speed, remote sensors and in medicine and these uses have been thoroughly tested and found to have no negative impacts on human health."*

To demonstrate compliance with the safety standard, an Environmental EME Report is available in **Appendix B** – Environmental EME Report or via the RFNSA website www.rfnsa.com.au (search site number 2582034). The maximum cumulative EME level at 1.5m above ground level is estimated to be **2.18%** (out of a 100% of the public exposure limit) as mandated by ACMA.

The EME Report predicts the maximum signal strength from the proposed facility at 1.5m above ground level is well within the allowable limit. This is typical of Telstra's responsible approach to network performance and environmental compliance. However, in reality, base stations are designed to operate at the lowest possible power level to accommodate only the number of customers using the facility at any one time. This design function is called "adaptive power control" and ensures that the base station operates at minimum, not maximum, power levels at all times. This means that the actual EME level at this site will be even lower than the predicted EME level.

Telstra undertakes further measures when designing the facility, to minimise the EME exposure to the general public, by installing the facility in accordance with the Australian Mobile Telecommunications Association (AMTA) Radio frequency (RF) Safety Compliance Program – Base Station Design Guidelines Engineering for Access Control to minimise EME.

Other preventative measures also include:

Power Control network feature that automatically adjusts the power of the network transmission based on consumer demand.

Varying the facility's transmit power to the minimal required level in order to save electricity and lower RF emissions from the facility.

Further information about EMF can be obtained from:

Commonwealth Department of Health (ARPANSA): www.arpansa.gov.au

Australian Communications and Media Authority (ACMA): www.acma.gov.au

World Health Organisation (WHO): www.who.int/en/

8.0 Conclusion

The proposed Amplitel telecommunication facility located at 9 East St, Murrumbateman NSW 2582 is integral to Telstra's ability to optimise their network coverage and capacity requirements through the delivery of a high quality and reliable service. Delivering on this objective is vital in order to enhance connectivity, economic development and opportunities for growth throughout the Murrumbateman area.

The proposal is considered permissible on its merits within the RU5 – Village zone under the provisions of the *Yass Valley Local Environmental Plan 2013*. Furthermore, it is generally compliant with the relevant planning considerations and the aims of objectives of the Yass Valley Local Environmental Plan 2013 , the Yass Valley Council Development Control Plan 2024, and the South East and Tablelands Regional Plan 2036. The proposal will operate within the regulatory framework of Commonwealth, State Governments and will operate within all current and relevant Australian Standards. The proposed facility will also comply with all Government health standards outlined by ARPANSA.

BMM Group has undertaken a thorough analysis of potential site alternatives and during this process has selected the most appropriate site for the facility. Factors such as the ability to meet the required coverage and technical objectives, opportunities for co-location by other carriers, the surrounding landscape and community needs have all been carefully considered as part of this selection process.

The Statement of Environmental Effects demonstrates that the proposed facility has been designed and sited in the most appropriate location in response to coverage objectives and in the context of adjacent and surrounding land uses. The facility location, setbacks, screening, colour and design of the proposed facility ensure that the natural environment and ecological processes are not compromised, and any potential visual impacts are mitigated so that the amenity of the locality and wellbeing of the community will not be detrimentally affected.

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

Appendix A – Proposal Plans

Appendix B – ARPANSA EME Report

Appendix C – AHIMS Report