# Statement of Environmental Effects for a Telecommunications Facility at PERISHER VALLEY SKI RESORT, KOSCIUSZKO ROAD, PERISHER VALLEY KOSCIUSZKO NATIONAL PARK NSW 2624

**Telstra Reference: Perisher Valley 357400**

**RFNSA: 2624007**

**Prepared by: CommPlan**

**on behalf of Amplitel and Telstra**

**January 2025**
Amended March 2025

# Table of Contents

# 1. INTRODUCTION

CommPlan Pty Ltd acts for and on behalf of Amplitel Pty Ltd ("Amplitel") for the deployment of Telstra Corporation Ltd ("Telstra") 4G and 5G network to regional and metropolitan Australia. For background, Amplitel is an entity that is formed under the parent company of Telstra and hold assets of over 8,200 wireless telecommunications structures making it the owner of the largest number of mobile towers in Australia.

Telstra have identified the need to introduce digital mobile telephone coverage and improve the performance of the 4G/5G mobile phone network in Perisher Valley. The proposed telecommunications facility is an integral element of the digital mobile phone network that Telstra is developing in Australia. With the increasing consumer demand for wireless voice and data services that is expected to continue to grow in the future, there is a need for an additional telecommunications facility to cater for the demand for services in the Perisher Valley area.

As such Amplitel's proposal aims to support local workers, visitors, local businesses and people who visit, travel through or work in the area, and to improve the capacity and quality of Telstra's mobile network services in the area. If the proposed facility is not completed there will be significant telecommunications service degradation and many customer complaints regarding the poor wireless telecommunications services and the poor services in the area, particularly in the busy periods of the snow season. The local economy will also benefit from the proposal as the new telecommunications facility will provide new and improved services to the area as a result of the location and height of the proposed antennas and the implementation of the latest technology in mobile phone networks. This will result in a range of benefits such as faster services, more capacity and increased reliability that result in community and economic benefits such as communication with emergency services, productivity, improved business opportunity, better economic environment, social interaction and safety for the people who visit and work in the Perisher Valley area.

Telstra radio frequency engineers, town planning, engineering and property consultants have undertaken intensive investigations for possible solutions within the local area. Following these investigations, Amplitel and Telstra identified a suitable opportunity to install a new monopole at Perisher Valley Ski Resort. The proposed telecommunications facility on resort next to the chair lift will offer the most suitable location in terms of network performance, access, electrical connectivity, fibre connectivity, minimal environmental impacts, build constraints, and satisfying Telstra's mobile phone service objectives.

Telstra, as a licensed telecommunications carrier, must operate under the provisions of the *Telecommunications Act 1997* and the *Telecommunications Code of Practice 2021*. The 1997 Act exempts carriers from the requirements of State and Territory environmental and planning laws in certain circumstances. This includes where a proposed facility falls within the definitions of the *Telecommunications (Low-impact Facilities) Determination 2018* (as amended). However, the current proposal does not satisfy the criteria as a low-impact facility pursuant to the *Telecommunications (Low-impact Facilities) Determination 2018* (as amended) and is therefore subject to NSW Environmental Planning Legislation. The proposed telecommunications facility cannot be defined as Complying development or Exempt Development under the provisions of State Environmental Planning Policy (Transport and Infrastructure) 2021 and therefore requires development consent.

# 2. BACKGROUND

## 2.1 What is a Mobile Base Station and How Do They Work?

A mobile base station is a facility that provides mobile telephone services to a geographical area. A mobile phone network is made up of base stations which operate together to provide service to users moving from place to place within the coverage area. A mobile base station typically consists of the following components: antennas, support structure, base station and transmission equipment.

The antennas are connected by cable to radio equipment usually housed in a room, shelter or outdoor equipment cabinet. Base stations are connected to the core network by radio transmission links or telecommunications optical fibre. The proposed facility will be connected via optical fibre.

Mobile phones work by sending and receiving low power radio signals, much like 2-way radio system. The signals are sent and received from antennas that are attached to radio transmitters and receivers, commonly referred to as mobile phone base stations. The base stations are linked to the rest of the mobile phone and fixed phone network and pass the signal/call on into those other parts of the network.

## 2.2 Benefits of Mobile Technology's

Mobile telecommunications play a central role in society and are becoming more deeply integrated into our day to day lives. Mobile phone telecommunication networks shape how and when people communicate and how we access information on a daily basis.

Telstra regularly undertakes detailed assessments of the performance and coverage of its digital mobile telephone network to ensure the service is reliable and achieves the required objectives. Reference to customer demand and customer complaints also provides an indication of areas of poor performance or where coverage is poor or does not exist.

During these assessments, Telstra identified that the existing mobile phone network services available within and around Perisher Valley requires improved mobile telephone coverage and network capacity. Perisher Ski Resort and business owners within Perisher Valley provided feedback indicating the existing services were not adequate and were adversely effecting their business operations. Although the area has some existing Telstra mobile telephone coverage, the level of service is not high. If the proposed facility is not installed Telstra's customer experience will be poor and the customers in the area will suffer from events such as call 'drop-outs, slower mobile broadband speed, buffering and inability to make connections.

The proposed installation of the telecommunications facility next to the Village 8 Express Chairlift Station at Perisher Valley Ski Resort, will form an integral element of the digital mobile telephone network that Telstra is operating and enhancing in Australia. This includes new of modified facilities within or near Blue Cow, Selwyn, Thredbo and Jindabyne.

# 3 PROPOSED DEVELOPMENT

The proposal is to install a telecommunications facility to provide improved capacity and coverage for Telstra customers who are working, visiting and travelling within Perisher Valley, Perisher Ski Resort and the surrounding alpine region. The proposal aims to improve telecommunications services in the area.

The subject site is located to the West of the main Perisher Ski Resort building, Ski Tube Station and car park and to the immediate north of the Village 8 express chair lift station within the Perisher Ski Resort that is within the Kosciuszko National Park. The suburb is Perisher Valley NSW 2624. The location selected for the telecommunications facility is located adjacent to Lot 149 DP1202193, Perisher Valley. The proposed tower location is currently zoned C1 – National Parks and Nature Reserves pursuant to the *Snowy River Local Environmental Plan 2013*.

The surrounding land consists of open space, bush land and ski infrastructure including the adjacent ski lift terminal to the West and a water reservoir approximately 23m to the East and the Chairlift Station located approximately 45m to the south. The proposal is to install a new telecommunications facility that requires an area of 9m x 6m compound area and includes a 20m monopole and associated telecommunications equipment shelter and antennas.

Please see **Figure 1** below for the proposed location of the proposed tower along with **Figure 2** demonstrating the proposed location of the new monopole and equipment shelter. For further details of the design please refer to **Attachment 1**.

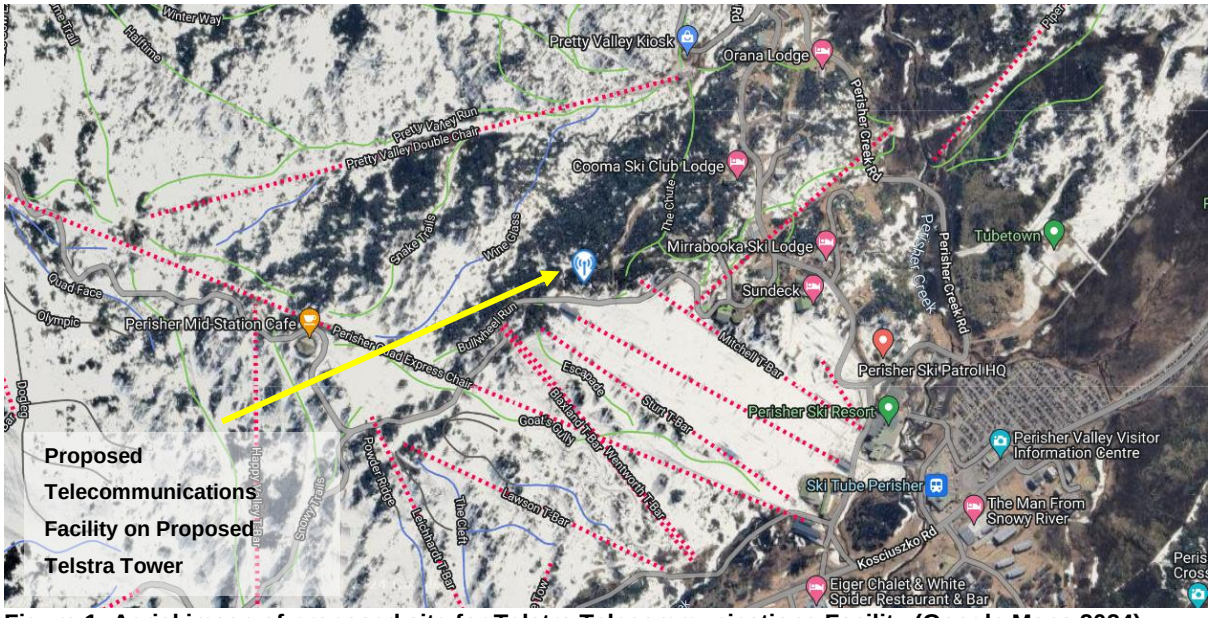


**Figure 1: Aerial image of proposed site for Telstra Telecommunications Facility (Google Maps 2024)**

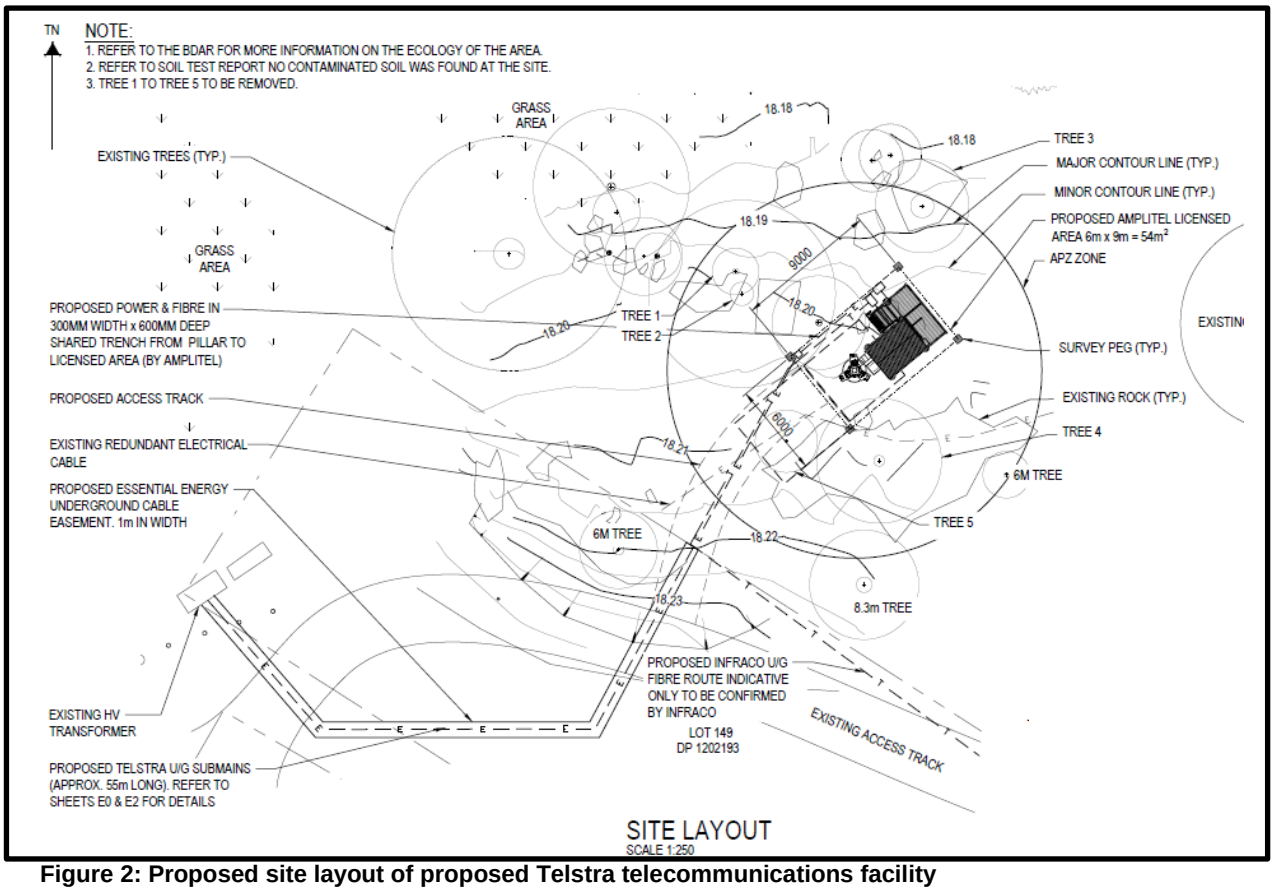


**Figure 2: Proposed site layout of proposed Telstra telecommunications facility**

The proposed telecommunications facility specifically includes the following components:

- One (1) new 20m monopole supporting a set of antennas with an overall height of 20.44m to be painted river gum green;
- The installation of Three (3) panel antennas (no more than 2.8m in length) collar-mounted to the monopole at a height of 19m (antenna centreline) on the proposed new monopole;
- A set of six (6) remote radio units (RRUs) collar mounted to the proposed monopole at a height of 16.70m;
- One (1) equipment shelter on a raised steel platform with a pitched alpine roof. The equipment shelter is proposed to be “river gum green” in colour to match the surrounding vegetation;
- One (1) proposed GPS antennas on the top of the monopole;
- The installation of cables and a cable tray from the equipment shelter to the monopole and then the cables will run up the inside of the monopole to the antennas;
- The installation of underground electricity supply cables from the existing essential energy electrical substation on Lot 149 DP 1202193. Cable will travel underground in a proposed easement;
- The installation of underground optic fibre cables from the nearest fibre access pit to

the equipment shelter;

- Installation of a 3m wide access track to run from the existing access track to the proposed facility;
- The establishment of a bush fire asset protection involving the removal of some trees and the any surface bush fire fuel.
- Installation of ancillary equipment and infrastructure associated with operation of the facility including; cabling, underground conduits, underground pits, tower footing, safe access methods, signage, earthing, electrical works and air-conditioning equipment.

Please refer to the design plans for more information on the proposed telecommunications facility in **Attachment 1**.

**Photo 1: Image showing area selected for proposed telecommunications facility**

The proposed electrical route has been detailed in **Attachment 1** design plans. As part of the proposed electrical connection the route will travel from the proposed facility traversing Lot 149 DP 1202193 and then connecting to the existing Essential Energy distribution board at the existing electrical substation on aforementioned lot.

# 1. Legislative Requirements

## 4.1 The Telecommunications (Low-Impact) Determination 2018

The proposal cannot be classified as a low impact facility in accordance with the Determination as the land is located within an Area of Environmental Significance as defined in the Determination being a National Park.

### 4.1.1 State Environmental Planning Policy (Transport and Infrastructure) 2021 (As amended)

Division 21 of the SEPP, titled "Telecommunications and other communication facilities" is relevant to the Proposal. A "telecommunications facility" is relevantly defined to include "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…" (s 2.140 of SEPP.

Division 21 falls within Chapter 2 "Infrastructure" of the SEPP. The aim of Chapter 2 is to facilitate the effective delivery of infrastructure across the State by:

*(a) improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and*
*(b) providing greater flexibility in the location of infrastructure and service facilities, and*
*(c) allowing for the efficient development, redevelopment or disposal of surplus government owned land, and*
*(d) identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and*
*(e) identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and*
*(f) providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing, and*
*(g) providing opportunities for infrastructure to demonstrate good design outcomes (s2.1 of SEPP).*

Development for the purposes of telecommunications facilities, that is not otherwise permitted without consent or exempt development or complying development under the SEPP may be carried out by any person with consent on any land (s 2.143(1) of SEPP). The effect of s 2.143 is that it overrides any relevant local environmental plan and zonings where telecommunication facilities are prohibited and allows for a development application for a telecommunications facility to be permissible with consent and assessed on its merits on any land and in any zone.

Before determining a development application for development to which s2.143 applies, a consent authority must take into consideration any guidelines concerning site selection, design, construction or operating principles for telecommunications facilities that are issued by the Planning Secretary for the purposes of this section and published in the Gazette (s2.143(2). Relevantly, the NSW Telecommunications Facilities Guideline, Including Broadband dated July 2010 ("2010 Guideline") has been published in the Gazette and therefore is required to be considered by the Council. The 2010 Guideline was updated in October 2022 (ie the "2022 Guideline" however as the updated version has not yet been gazetted, the 2010 Guideline remains relevant (TPG Telecom Limited v Inner West Council [2023] NSWLEC 1778).

### 4.1.2 State Environmental Planning Policy (Precincts - Regional) 2021 – Chapter 4 Kosciuszko Alpine Region

The proposal is subject to the provisions of the SEPP (Precincts Regional) 2021 – Chapter 4 Kosciusko Alpine Region. as the site falls within the Alpine Resort area, as identified on the Alpine SEPP Land Application Map.

Under Clause 4.2 the land to which this chapter applies the proposed development is located within *State Environmental Planning Policy (Precincts—Regional) 2021 Perisher Range Alpine Resort Map,* and therefore subject to this Chapter of the SSEP.

In accordance with Part 4.1 and development that is permitted the proposed development is noted to be permitted with consent within the Perisher Range Alpine Resort.

***Objectives of the SSEP Chapter 4 – Kosciuszko Alpine Region are:***

*a) to encourage the carrying out of a range of development to support sustainable tourism in the Alpine Region all year round, if the development does not result in adverse environmental, social or economic impacts on the natural or cultural environment of the Alpine Region, including cumulative impacts on the environment from development and resource use,*

The proposed facility is considered to be consistent with this objective in that it will not detrimentally affect the natural or cultural environment within the Alpine Region. This is confirmed by the Biodiversity Assessment conducted by Eco Logical and the report that is included in **Attachment 4.** The proposal will also result in improved telecommunications services for people visiting and working in the area which will ultimately have positive social and economic impacts.

*b) To establish planning controls that:*
*i) Contribute to and facilitate the carrying out of ecologically sustainable development in the Alpine Region, and*
*ii) Recognise the Alpine Regions significant contribution to recreation and tourism economy in the State,*

The establishment of a telecommunications facility in the Alpine Region will prioritise sustainable development principles, ensuring minimal environmental impact through careful site selection and design. Measures have been taken to minimise disruption to natural habitats, with the facility being strategically placed in a location that reduces the need for extensive vegetation removal. Please refer to the Biodiversity Assessment in **Attachment** 4 for further information. The development of the telecommunications facility will enhance the region's connectivity, improving communication infrastructure for both residents and visitors. By providing reliable mobile and internet services, the facility will support tourism operators, recreational activities, and local businesses, contributing to the economic growth of the Alpine Region. Enhanced connectivity will allow tourists to stay connected while exploring the region, improving their overall experience. Additionally, the improved telecommunications infrastructure will foster the growth of tourism-related industries. The proposed facility has also taken into consideration visual and aesthetic impact of the facility, ensuring it aligns with the region's natural beauty and tourism appeal.

*c) to minimise the risk to the community of exposure to environmental hazards, particularly geotechnical hazards, bush fires and flooding, by—*
*i) generally requiring development consent on land in the Alpine Region, and*
*iii) establishing planning controls for buildings to ensure the safety of persons using the buildings if there is a fire.*

The proposal will not compromise the safety of the community in relation to environmental hazards. The proposal will in fact improve communications services in the area, improve the safety of people and improve telecommunications services in the event of an emergency. The proposed Telstra telecommunications equipment will ensure there is adequate telecommunications services available should there be an emergency such as human injury or bushfire. The proposal itself is designed by engineers and has undergone a geotechnical assessment (**Attachment 7)**, structural assessment as well as a bushfire risk assessment prepared as part of the development application and the proposal does not pose a risk to the community.

### 4.1.3 National Parks and Wildlife Act 1974 (NPWA)

In accordance with Clause 153D of the NPWA, the Minister may grant a lease, licence or easement on any land reserved under the Act if the facility satisfies the following criteria:

*(a) There is no feasible alternative site for the proposed broadcasting or telecommunications facility concerned on land that is not reserved under this Act;*

The purpose of the proposed telecommunications facility is to improve mobile phone services within the Perisher Ski Resort area and the surrounding alpine region. No feasible alternative locations are available on land that was not reserved. The proposal utilises unused land that is nearby to existing infrastructure such as a water reservoir and chair lift facility to ensure minimal disturbance to bushland and the site is considered appropriate for this area. As the selected location is located within the Mount Kosciusko National Park, Telstra has sought a property agreement and consent from NSW National Parks and Wildlife / Office of Environment and Heritage to install and operate the telecommunications facility.

*(b) The site of any proposed above ground broadcasting or telecommunications facility covers the minimum area possible;*

The proposed facility covers the minimum area possible to house the proposed monopole, equipment shelter and associated equipment that is necessary for the operation of the facility. The proposed compound area is 6 x 9m and includes the monopole, equipment shelter and associated telecommunications equipment. A fence is not proposed and therefore the 6m x 9m area will not be defined with a fixed object and therefore the area being used will appear to be less than the 6m x 9m area. The proposal could have included a much larger foot print if a different sort of tower was used such as a lattice tower. The area being used has been minimised though the design process and use of a slim line 20m monopole.

*(c) the proposed broadcasting or telecommunications facility is to be designed and constructed in such a manner as to minimise risk of damage to the facility from bushfires;*

A 10m APZ zone is to be established around the Telecommunications facility as part of this proposal. This will require the removal of 0.06 hectares of vegetation for the infrastructure and creation of the APZ . This has been assessed further in the Biodiversity Assessment Report included in **Attachment 4**.

*(d) the site and construction of the proposed broadcasting or telecommunications facility have been selected, as far as is practicable, to minimise the visual impact of the facility;*

During the site selection and design process, we have tried to minimise the visual impact of the proposed telecommunications facility whilst managing the objectives to provide high quality wireless telecommunications services to the Perisher Valley ski resort area. A number of measures have been put in place to minimise any potential adverse visual impacts. These include the green colour scheme, the minimal height of 20m, the use of a monopole and the selected location near the chairlift and water reservoir. The installation of taller facility or the use of a lattice tower with a large head frame would have been preferred from a telecommunications network perspective, however this would have resulted in a potentially more visible and bulkier facility. The monopole and associated equipment are to be installed within a 6 x 9m compound area. The use of a monopole over a lattice tower has been utilised to reduce visual impact. Please see **Attachment 5** for further photos.

(e) if feasible, an existing means of access to the proposed site of the lease, licence, easement or right of way is to be used;

The construction and operation of the telecommunications facility will use as much of the existing access tracks and other existing infrastructure as much as possible. The proposed facility will utilise existing access tracks from Perisher Valley Ski Resort car park that goes to to the Village 8 Express Chair Lift and water reservoir. There is a need to build a small section of a new access track that will form an extension to the existing track. The proposal includes a 3m wide access track that is approximately 15m long that heads in a north direction off the existing access track. Please see below **Figure 4, 5 and 6** for a photo and design plans of the existing access and proposed access.

**Figure 4: Existing track with indication of proposed access track towards the proposed Telstra facility**

**Figure 5: Approximate location of the proposed access track**

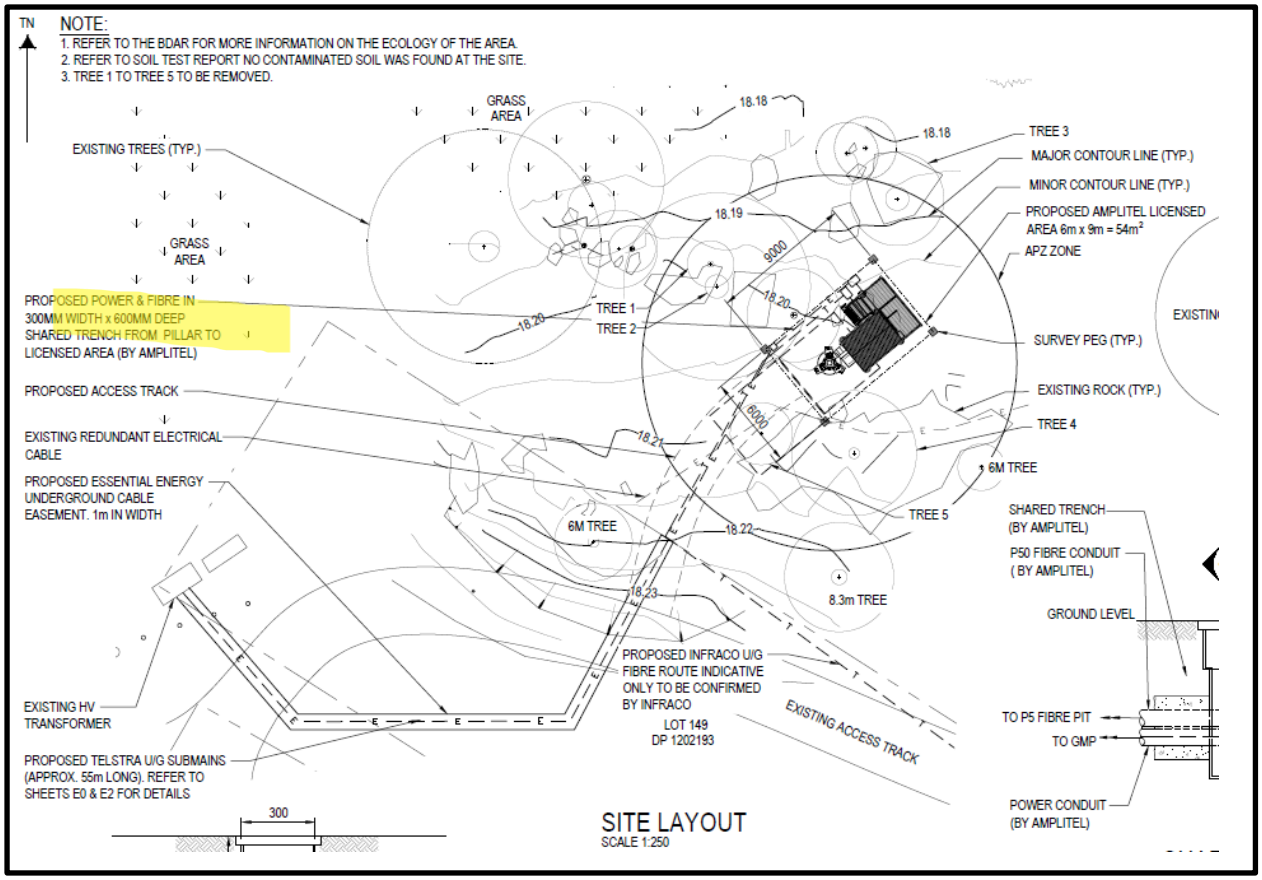


**Figure 6: Design Plans indicating proposed access track**

*(f) the proposed broadcasting or telecommunications facility is essential for the provision of broadcasting or telecommunications services for land reserved under this Act or for surrounding areas to be served by the facility;*

Perisher Ski Resort is located within a remote area with topographical constraints that has resulted in limited mobile phone coverage being received from outside the National Park. The proposed facility is intended to supplement the existing facilities in the area to improve communications for all workers and visitors to the area who wish to access the Telstra network. There has been a number of complaints regarding the capacity and quality of the existing services. Given the remote nature of the area, the economic activities, the recreational activities and the large number of people who visit the area, the provision of high quality wireless telecommunications services is considered essential and this proposal aims at addressing this requirement.

*(g) the broadcasting or telecommunications facility is to be removed and the site of the facility is to be restored as soon as possible after the facility becomes redundant (for example, due to advances in technology);*

If the telecommunications facility becomes redundant, Amplitel and Telstra will remove all above ground equipment and restore the area as close as practicable to its original condition.

*(h) the site of the proposed broadcasting or telecommunications facility has been selected after taking into account the objectives set out in any plan of management relating to the land concerned;*

The proposed facility is consistent with the objectives and provisions outlined in the Alpine SEPP. The location was selected after consultation with National Parks, the Dept of Planning and Perisher resort.

*(i) the proposed broadcasting or telecommunications facility is, if feasible, to be co-located with an existing structure or located at a site that is already disturbed by an existing lease, licence, easement or right of way on the land concerned.*

Colocation opportunities were investigated as part of the site selection process and there were no available co-location opportunities that would meet the Telstra coverage objectives. Development consent is therefore being sought for a new telecommunications facility to be installed including a 20m monopole and associated telecommunications equipment. The proposed design has been implemented to ensure minimal impact on the surrounding area. The assessment of all available co-location opportunities revealed that it was not feasible for the proposed telecommunications facility to be co-located with or on an existing tower or other communications infrastructure.

### 4.1.4 State Environmental Planning Policy 44 (Koala Habitat Protection) 2016

The area for the proposed facility  has been assessed. The study area which was assessed in the Biodiversity Assessment undertaken for this proposal (**Attachment 4**) determined that the area supports no tree species which are Koala feed tree species as defined in Schedule 1 of the SEPP. Therefore, this area is not considered to be potential for Koala habitat. The proposed works for the telecommunications facility will therefore have no significant impact and no requirements under this SEPP are required to be implemented.

### 4.1.5 Biodiversity Conservation Act 2016

An assessment of the likelihood of threated biota has been undertaken as part of the Biodiversity Assessment, please refer to **Attachment 4** for a copy of the assessment. As the proposed works are located within the Kosciuszko National Park within an area included on the biodiversity values map (OEH 2019) and involves the removal of native vegetation the Biodiversity Offset Scheme (BOS) is triggered. As part of this proposal the NSW Biodiversity Assessment Method has been undertaken and a Biodiversity Assessment Report is required to be submitted as part of the proposal and is included in **Attachment 4** of this report.

Native Vegetation has been identified within the area to be occupied by the telecommunications infrastructure to be known as *Kosciuszko Alpine Sally Woodland*. This vegetation is not listed under the Biodiversity Conservation Act or the EPBC Act. No other plant community types were identified within the search area that is noted as a threated ecological community.

Due to the presence of native vegetation within this area as noted in the test of significance, the proposal will require Amplitel to enter the Biodiversity Offset Scheme. Please refer to the Biodiversity Assessment at the end of the Biodiversity Assessment Report in **Attachment 4** for detailed results.

The proposal is not likely to cause any significant impact to species or communities within this area. The report indicates some potential impacts and suggests mitigation measures to be taken into consideration during the construction phase.

### 4.1.6 Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW

The proposed telecommunications facility has been assessed in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objections in NSW (OEH 2010)*. A field survey, associated research and report has been prepared in accordance with the requirements of the due diligence code of practice and is attached to this report in **Attachment 3.**

As concluded in the report, the proposed works can proceed without further heritage assessment with caution.

The following recommendations have been made in the report and will be adhered to by Amplitel and Telstra in the construction process if any Aboriginal material is discovered:

- All work must cease in the vicinity of the find and project manager notified immediately.

- A buffer zone of 10m should be fenced in all direction of the find and construction personnel made aware of the 'no go' zone.
- NSW Heritage must be notified of the find and advice sought on the proper steps to be undertaken.
- After confirmation with NSW Heritage a heritage consultation should be engaged to undertake assessment of the find and provide appropriate management recommendations to the proponent.

Please refer to **Attachment 3** for further information.

### 4.1.7 Geotechnical Policy Kosciuszko Alpine Resorts

As part of this application a geotechnical report has been completed and is attached to this report in **Attachment 7**. Both Form 1 and Form 4 have also been completed and signed off as part of this process and are also attached to this report.

### 4.1.8 Bushfire Phone Land

The subject site has been identified to be within bushfire phone area within Vegetation Category 1. As the subject site is within a bushfire prone area, an asset protection zone (APZ) is proposed to be established and will be maintained around the proposed telecommunications monopole and equipment shelter for bushfire protection purposes. The APZ is planned to be an area of approximately 10m from the monopole and equipment shelter. Please refer to the Biodiversity Assessment Report in **Attachment 4 and the Site Analysis Plan** for further information. The APZ zone is being established in compliance with the *Telecommunication Towers in Bushfire Prone Land* as prepared by the Rural Fire Service.

# 5 Section 79C of Environmental Planning and Assessment Act 1979

### 5.1.1 Section 79C1(a) Environmental Planning Instruments

The key environmental planning instruments relevant to the proposal that have been discussed above are:

- State Environmental Planning Policy (Transport and Infrastructure) 2021.
- State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007.
- State Environmental Planning Policy 44 (Koala Habitat Protection) 2016

### 5.1.2 Section 79C 1(a)(ii) Draft Environmental Planning Instruments

No applicable draft environmental planning instruments. The proposed Telecommunications facility is located within the Snowy River LEP area though as per Part 1 Section 10 of the SEPP (Kosciuszko National Park – Alpine Resorts 2007) this planning instrument does not apply.

### 5.1.3 Section 79C(1)(a)(iii) Development Control Plans

No applicable Development Control Plan applies to this site. The proposed Telecommunications facility is located within the Snowy River DCP area though as per Part 1 Section 10 of the SEPP (Kosciuszko National Park – Alpine Resorts 2007) this planning instrument does not apply.

### 5.1.4 Section 79C (1) (a) (iiia) Planning Agreements

There are no applicable Planning Agreements.

### 5.1.5 Section 79C (1) (a) (iv) Regulations

A development application will be lodged in accordance with the Environmental Planning and Assessment Regulation 2000.

## 5.2 Section 79C (1) (b) Other Impacts of the Development

No other impacts of the development have been noted.

### 5.2.1 Natural and Built Environment

The proposal will have no significant detrimental impact on the built or natural environment. A biodiversity assessment has been undertaken to assess the proposed Telecommunications facility along with the associated APZ to be established. The proposed works have been assessed against the *Environment Protection and Biodiversity Conservation Act 1999*, *Biodiversity Conservation Act 2016, Environmental Planning & Assessment Act 1979*, State Environmental Planning Policy (Transport and Infrastructure) 2021, State Environmental Planning Policy (Kosciuszko National Park – Alpine Resorts) 2007, State Environmental Planning Policy (Koala Habita Protection) 2016 and the *National Parks and Wildlife Act 1974*. The report concludes that the proposal is unlikely to have a significant impact on any BC or EPBC Act listed fauna or flora species. It is recommended that the proposal proceed as planned, whilst ensuring safeguard measures are implemented as identified in the report.
Please refer to the Biodiversity Assessment in **Attachment 4** for further information.

### 5.2.2 Social and Economic Impacts

The proposed telecommunications facility will have both positive social and economic benefits for the community. Visitors and workers in the area will have improved telecommunications services in the area. There are also significant safety benefits that will result from the telecommunications services being provided.

## 5.3 Section 79C (1) (c) Suitability of the Site

The proposed location is considered suitable as it is located within an area that requires the most minimal disturbance possible. The proposal is located nearby to previously disturbed areas and other existing infrastructure such as the water reservoir and the ski lift. From a radiofrequency perspective, the facility achieves its coverage objectives.

## 5.4 Section 79C (1) (d) Submissions

Not applicable at this stage.

### 5.5 Section 79C (1) Public Interest

This Statement of Environmental Effects and associated reports and documentation outlines how the proposal is considered to be consistent with the aims and objectives of the relevant planning policies and legislation. Overall, the minor impact of the facility will be significantly outweighed by the benefits to the community from improving the telecommunications services in the area, especially during peak ski season.

## 6.2 Visual Impact

**Assessing the visual impact of telecommunications towers**

The 2010 and 2022 Guidelines (Principle 1) require consideration of the visual impact of a proposed telecommunications facility and opportunities for mitigation of visual impact. Standalone telecommunications facilities of the type proposed within Perisher Ski Resort require the installation of a tower or monopole with sufficient height clearance above the tree canopy and surrounding infrastructure to ensure adequate service levels to the target catchment. In the case of the proposed telecommunications facility, a minimum height of at least 20m is required, given the terrain and height of surrounding vegetation.

Like many other items of essential infrastructure comprising taller structures, such as electricity transmission towers, wind turbines and tall lighting poles, the proposed facility will need to extend above existing buildings, infrastructure and vegetation, and hence will be visible in the landscape, particularly when viewed from closer viewing distances.
Consideration of visual impact requires balancing the need for the facility and the associated benefits that will be provided to the broader community in maintaining and enhancing an essential service, with locational and design options that minimise visual impact on the locality, particularly in locations of good to high visual quality.

Visual impact assessment does involve some degree of subjectivity in that what is attractive or visually obtrusive to some, may not be so to others to the same extent, particularly in relation to the built form. Matters of taste and individual preference are very personal and should be given little, if any, weight in an objective visual impact assessment.
An objective visual impact assessment should have regard to the visual character, qualities, and physical setting of the location of the proposed telecommunications facility. Where visual character and setting is of good quality or of high visual significance, for example due to its attractive visual qualities, uniqueness, or prominence, then visual impact of a development will be of particular importance. Where visual character and setting is of more modest quality, visual impact would be given a much lower weighting.

The visual prominence of a building or structure does not mean that such development is deemed unacceptable. Iconic and landmark structures, recognised as having great design merit, such as the Sydney Opera House and the Sydney Harbour Bridge, are prominent in the high-quality setting of Sydney Harbour, yet contribute positively to the visual qualities of that setting. Alternatively, a building or structure of more modest design quality, that is also visually prominent, may not have an unacceptable impact, where located within an area of low to moderate visual quality and amenity.

While some items of “industrial infrastructure” may be considered to have a positive visual impact, it is generally accepted that telecommunications facilities, such as mobile phone towers, do not make a positive contribution to the visual qualities of the localities within which they are located. It is important, however, to note that the Telecommunications Guideline does not suggest that telecommunications facilities must not have a negative visual impact. Rather, they require that facilities should be designed and sited to minimise visual impact.

The approach to assessing the visual impact of telecommunications activities of the type proposed should have regard to the nature of these facilities, as items of essential infrastructure, hence the emphasis on minimising, rather than avoiding visual impact.

Ideally telecommunications facilities, such as mobile phone towers, should be located in areas of lower visual quality, such as industrial or commercial areas or infrastructure corridors, or within large rural or open space areas where they can be sited well away from residences. However, in many cases such lower impact locations are not always available, or suitable to meet radio frequency service requirements and hence in such situations there is no alternative to locating a facility in an area of higher visual quality and/or closer to residential or other more visually sensitive land uses.

**Site Selection**

The site selection process for the facility considered a range of sites and selection criteria, including potential visual impact, in arriving at the preferred site for Perisher Valley.

Opportunities were explored to identify alternative sites capable of accommodating a new facility that achieved service requirements, as well as allowing for a facility to be designed and sited in a manner that minimised visual impact, noting separation distances from existing infrastructure or important lines of sight within Perisher Valley and potential for bushland and existing vegetation that could provide screening, and over which tenure could be secured.

It has not been possible to identify an area of low visual quality within or adjoining the target area, and as such all potential sites that are capable of achieving the necessary service requirements are nearby to existing infrastructure but sited to ensure minimal visual impact on the surrounding amenity.

**Measures to mitigate visual impact**

The Telecommunications Guideline requires consideration of options to mitigate visual impact.

The following measures have been adopted in particular to mitigate visual impact:

- The proposed facility is located nearby to existing essential infrastructure such as the water tank to the East of the proposed facility which will provide partial screening of the facility when viewed from the East;
- The location is near to the start of the chair lifts so when tourists are utilising the chair lifts they will not be able to see the facility as the lifts are moving away from the facility;
- The height of the pole limited to 20m along with the use of a grey pole which assists in integrating the facility into the sky backdrop and blending in with its surrounds;
- The proposed facility's use of a slim monopole, rather than a lattice tower form, to streamline the facility and further mitigate visual impact (**refer to Figure 7 below**)
- The proposed facility to utilise a turret mounting arrangement (**an example shown in Figure 9**) rather than a large headframe arrangement **(an example shown in Figure 8**).

The use of the monopole, the grey colour of the facility and antenna size all assist in reducing the bulk and scale of the facility and minimising any potential adverse visual impacts. The overall design will have a neutral presence which will fade into the background.

**Figure 7: By contrast to the Proposal, an existing telecommunications facility using a lattice tower instead of a monopole**

**Figure 8: By contrast to the Proposal, an existing telecommunications facility using a monopole with a square headframe located at 43 Cattai Ridge Road, Glenorie.**

**Figure 9: Similar to the Proposal, an existing telecommunications facility using a monopole and turret or collar mount antenna arrangement.**

The surrounding area is made up of ranges and valleys as being a part of the Perisher Ski Resort and surrounding Alpine Region. The Perisher Range is 1204m approximately to the West of the proposed facility on the other side of Perisher Valley. To the East of the proposal is Rams Head Range.

The peak of Mount Perisher is approximately 1816m from the proposed monopole location. The proposed facility is expected to be visible from the top of Mount Perisher and the areas immediately adjacent to the Peak, however given people that will be on Mount Perisher and their view line down towards the proposed monopole will be looking down and therefore the background will be the surrounding land, trees and ground surface, the facility is not expected to be a main feature of the visual amenity and is not expected to be noticeable to a person walking around Mount Perisher due to the distance and slim nature of the proposal which will blend in with the surrounding backdrop. When you are at a higher ground elevation than the proposed facility either skiing or enjoying the park particularly from the Main Ridge line it is unlikely you will be able to notice the facility and the facility will not be a main identifiable feature of the landscape. We have included a photo below in **Figure 10** which demonstrates looking down towards Perisher Valley Resort from the area adjacent to the Village 8 Express Chair Lift Station, as you can see from this photo it is difficult to identify the existing telecommunications facility from a higher elevation point.

**Figure 10: View looking towards an existing telecommunications facility from adjacent to the Village 8 Express Chair Lift Station**

As demonstrated in **Figure 11** and **12** looking up towards the proposed facility location from the Perisher Ski Tube Station the proposed facility will not be a dominate feature of the landscape. The facility will be partially screened by the existing vegetation and there are other dominate features of the surrounding environment that are more visible. The proposed facility will blend in with the sky backdrop and not impede negatively on view lines from the Resort.

**Figure 11: View looking towards the proposed facility from the Perisher Ski Tube Station | Photo Taken April 2025**

**Figure 12: View looking towards the proposed facility from the Perisher Ski Tube Station | Photo Taken April 2025**

**Conclusion**

From the discussion outlined above, a number of conclusions can be made with respect to visual impacts arising from the telecommunications facility proposed. These conclusions are summarised as follows:

- the Proposal has been designed and will be finished to have minimal visual impact on surrounding environment without undermining its viability to meet the coverage and capacity requirements of Perisher and surrounding areas;
- grey colouring and a slimline monopole design lessens the potential visual impact;
- views of the Proposal are limited predominantly to within close proximity of the monopole, from further away the proposal is screened by mature vegetation in the existing landscape;
- the nature of the technology determines that telecommunications facilities require line of sight to the areas that they are serving, subsequently the antennas need to be visible to these areas in order that they provide effective service to the user;
- telecommunication facilities are an accepted part of the peripheral landscape and an expected component within the built environment. Much like essential services such as power lines and street lights, telecommunications facilities are now part of the expected streetscape in built areas. With the expectation of having mobile phone coverage, there is an acceptance that facilities that provide the coverage will be visible. Over time these facilities become part of the background and are no longer noticed.

Further, the height of the monopole and the antennas has been minimised and this represents a significant compromise to the performance and potential coverage from the proposed facility. From a radio coverage and network performance. This minimisation of the height to a 20m monopole has been done to reduce the visual impacts on the surrounding area.

Amplitel, in partnership with Telstra, has taken all appropriate and available measures to mitigate any potential impact on the visual amenity at this location and it is considered that the Proposal is vital infrastructure that would provide enhanced services to customers, providing improved coverage and improved wireless telecommunications services to parts of Perisher Ski Resort and surrounding areas.

# 6 Conclusion

This Statement of Environmental Effects (SEE) demonstrates that the proposed facility and associated telecommunications equipment is an appropriate and suitable development when tested against the relevant heads of considerations detailed within the section 4.15 of the Environmental Planning & Assessment Act, 1979.

This SEE has identified all key issues associated with the Proposal and demonstrated that it can be developed appropriately and will make a positive contribution to the locality. In particular, the Proposal supports local businesses, education facilities and residents and contributes to community safety and use in emergency events for all mobile phone users.

The Proposal is considered acceptable and can be approved because:

1. The Proposal is permitted with consent on any land (s2.143(1) of the SEPP.
2. The Proposal complies with the 2010 Guideline made under s2.143(2) of the SEPP.
3. The Proposal will provide high quality mobile phone network services to people who live in, work in, visit or travel through the area.
4. No airspace protrusion impacts are expected.
5. Visual impact is acceptable in the circumstances having regard to site context, the nature of the facility as an essential service and the unavoidable requirement that such facilities must extend above the height of buildings and tree canopy.
6. There will be a wide range of social, economic and community safety benefits as a result of this proposal.

This SEE has demonstrated that the Proposal at the Subject property will satisfy statutory based planning considerations and poses no significant adverse environmental impacts. There is a wide range of benefits that will be derived from the proposal and these far outweigh any potential adverse impacts. Given the findings of this SEE and public benefit of providing such infrastructure, it is considered that there is no matter which should preclude development consent being issued for the Proposal.

## Attachment 1 – Design Plans

## Attachment 2 – EME Report

## Attachment 3 – Aboriginal Cultural Heritage Due Diligence Assessment Perisher Telecommunications Facility

## Attachment 4 – Telecommunications Tower – Perisher Ski Resort, NSW Biodiversity Development Assessment Report – June 2024

## Attachment 5 – Photomontage

## Attachment 6 – Owners Consent

## Attachment 7 – Geotech Report

## Attachment 8 – Survey Report