

Proposed Telstra Mobile Telecommunication Facility at:
30 Condowie Road, Daruka NSW 2340 (107/-/DP753841)

Statement of Environmental Effects

20 June 2025



ServiceStream

Our Reference: Daruka Woonooka Rd

Prepared by: Service Stream Limited

On behalf of: Amplitel Pty Ltd



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Table of Contents

Document Control Record	2
1 Introduction	5
1.1 Executive Summary	5
1.2 Purpose of the Development Application	5
1.3 Telstra – Company Profile	5
2 The Proposed Facility	7
2.1 Site Location and Surrounds	7
2.2 Description of the Proposal	9
2.3 Construction of the Facility	9
2.4 Need for Proposal	10
2.5 Consequences for not proceeding	10
3 Site Selection and Justification	11
3.1 Options Considered	11
3.2 Preferred Option	14
4 Environmental Assessment	15
4.1 Commonwealth Legislation	15
State Legislation	19
4.3 Tamworth Local Environmental Plan 2010	24
5 Environmental Impact Assessment	27
5.1 Visual Impact	27
5.2 Socio – Economic Considerations	27
5.3 Heritage and Cultural Values	28
5.4 Traffic, Access and Construction Management	29
5.5 Contaminated Land	30
5.6 Utility Services	30
5.7 Noise and Vibration	30
5.8 Health and Safety	31
5.9 Other Impacts During Construction	32
6 Conclusion	33



Appendix A.....	34
Appendix B.....	35
Appendix C.....	36
Appendix D.....	37



1 Introduction

1.1 Executive Summary

This Statement of Environmental Effects (SEE) has been prepared by Service Stream who has been engaged by Amplitel Pty Ltd (Amplitel) for the roll out of the Telstra telecommunications network. Amplitel are part of the Telstra Group and provide wireless infrastructure for mobile carriers across Australia. The proposed site is located at Lot 107 on plan DP753841, known as 30 Condowie Road, Daruka. The proposed development will enable Telstra as a licensed carrier to provide adequate coverage to their customers in the Daruka area.

Daruka currently suffers from insufficient mobile coverage and poor capacity. Telstra regularly tests the efficiency of its existing networks and has identified severe shortcomings in Daruka, worsened by the increasing demand for mobile network services and data capacity.

Amplitel propose to construct a new 40m monopole on vacant land between Daruka Road and Uranger Drive. The new facility will deliver improved 4G and 5G coverage and capacity to the Daruka area.

This Development Application has been prepared in accordance with relevant statutory and regulatory requirements. Potential impacts associated with this development while visible are not expected to have a significant impact on the broader area.

In this instance, the socio-economic benefits to the local community outweigh the perceived impact of such development and include:

- Providing good network coverage and capacity, including in-building coverage, to the community.
- Meeting the community's increasing demand for quality and reliable mobile phone service.
- Providing infrastructure to meet the community's social, business and educational needs.
- Improving the reliability of Telstra's incoming and outgoing services to Emergency services organizations and road users to assist in the event of an emergency.
- Increasing the level of competition in telecommunications, resulting in competitive prices, economic efficiency and increased consumer choice.

1.2 Purpose of the Development Application

The proposed base station will improve coverage and capacity to the local community, including local and home businesses in the area who require mobile and wireless broadband services.

The facility will bring the poor mobile services in Daruka up to date with the majority of urban areas in the State, where reliable mobile coverage has become a basic expectation. In turn, this will enable Telstra to continue to enhance and expand its mobile services to customers in the area.

1.3 Telstra – Company Profile

Telstra is Australia's leading telecommunications and information services company, with one of the best-known brands in the country. Telstra offers a full range of services and competes in all telecommunications markets throughout Australia, and provides 17.7 million retail mobile services, 4.9 million retail fixed voice services and 3.6 million retail fixed broadband services.

Some of Telstra's main activities include the provision of:

- Basic access services to most homes and businesses in Australia;
- Local and long-distance telephone calls in Australia and international calls to and from Australia;
- Mobile telecommunications services;
- Broadband access and content;
- A comprehensive range of data and internet services.



One of Telstra's major strengths in providing integrated telecommunications services is its vast geographical coverage through both its fixed and mobile network infrastructure. This network infrastructure underpins the carriage and termination of the majority of Australia's domestic and international voice and data telephony traffic.

For more information about Telstra's company profile, follow this link: [Telstra company profile](#).

2 The Proposed Facility

2.1 Site Location and Surrounds

The subject site for the proposed development is located at 30 Condowie Road, Daruka. Daruka is an outer suburb of the north of Tamworth located approximately 9km north-east of the centre of town. The immediate area surrounding the site includes low density residential uses consistent with that of a regional town. The broader area comprises mostly low density residential. The closest residential dwelling is approximately 120m west on the adjacent property.

Figures 1-3 below identifies the proposed location on the property and within the context of its local area.

Figure 1: View of subject lot and immediate surroundings (Google Earth)

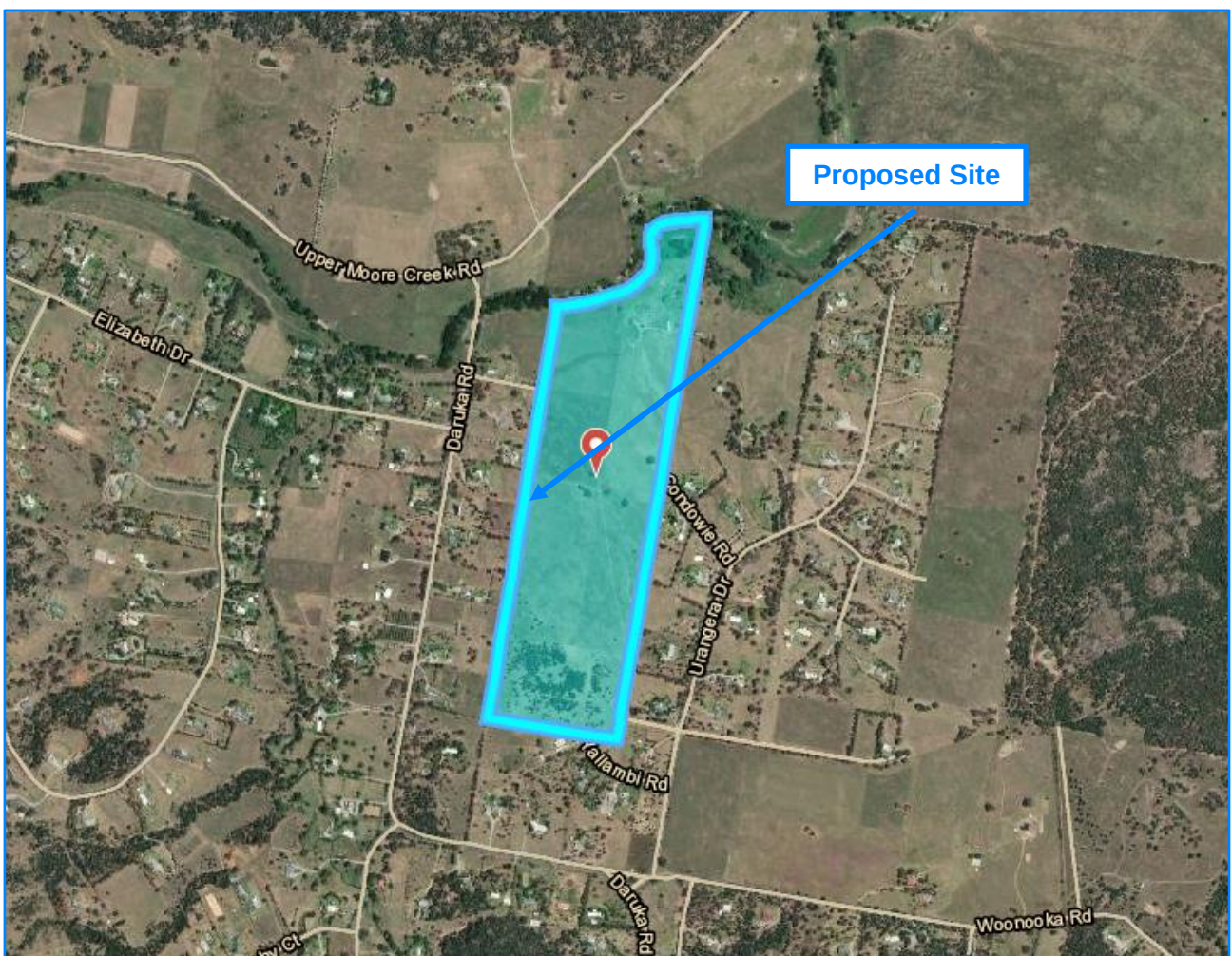
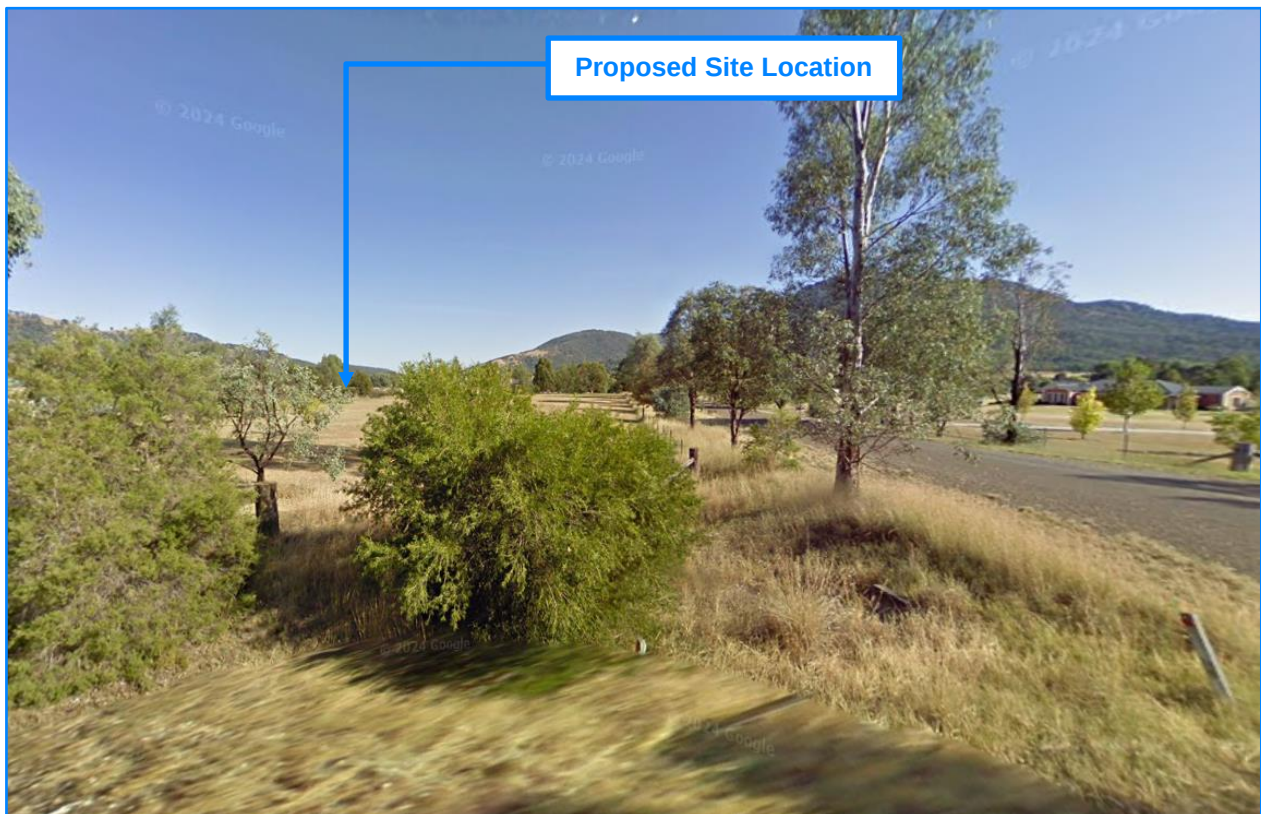


Figure 2: View facing east towards the proposal, taken from Daruka Road



Figure 3: View facing north towards the proposed location from the subject property





2.2 Description of the Proposal

A detailed description of the components of the facility are as follows (also see attached design drawings in **Appendix A**):

Installation details:

- One (1) 40 metre monopole with a triangular headframe (overall height 42.4 metres including the antennas);
- Six (6) Telstra panel antennas (2533mm H x 350mm W x 209mm D) mounted on the triangular headframe;
- Ancillary equipment associated with the operation of the facility, including tower mounted amplifiers, remote radio units, cable trays, cabling, safe access methods, earthing, electrical works and air-conditioning equipment;
- Installation of a fire-rated equipment shelter at the base of the facility;
- Installation of a compound security fence (10m x 10m) with double access gates with a minimum 10m separation to the existing boundary fence;
- Construction of a new 3m wide access track, approximately 700m long including a new crossover with Daruka Road.

Power and Fibre

Power and Fibre will be obtained from the existing points of supply on the property. A power upgrade may be required this will be confirmed during the detailed design stage of the proposal.

2.3 Construction of the Facility

Construction activities will involve the following:

- Excavation of the monopole foundation;
- Delivery and pouring of concrete on site for the monopole and equipment shelter footings;
- Installation of conduit within trenches, followed by installation of cables within conduits;
- Delivery of the monopole sections to site;
- Separate installation of each monopole section;
- Attachment of antenna mounts, headframe, cables, cable ladder to units and antenna on to the monopole;
- Installation of the earth grid and connection of the base station to the electrical supply and optical fibre cables;
- Installation and commissioning of the base station radio equipment;

The daily construction process will require three to six workers on site and an average of four to six vehicle movements. The general construction timeframe, weather dependent, is approximately 5 weeks.

2.4 Need for Proposal

The proposal is intended to improve mobile network coverage and capacity in the Daruka area, ensuring reliable telecommunications services are available. The facility will meet the current coverage gap and provide the most recent, high-quality Telstra mobile and data coverage to the many homes and businesses in the area and assist with meeting the capacity demands.

The proposed site is seen as a long-term investment by Telstra and is anticipated to meet predicted future coverage needs of population growth in the area. To ensure consumers continue to receive high quality services and competitive pricing Telstra requires a facility at Daruka.

The significant growth in demand for mobile facilities and broadband means establishing a facility at this location is essential. The rapid evolution of the sector resulting in increased usage of smart phones, tablets and other wireless devices continues to place further demand on the network.

Telstra currently has no macro cell sites servicing Daruka and the surrounding area within 2km from the proposed location, outlined in Section 3.1 below. The nearest sites are located on the outskirts of Tamworth with the primary purpose of servicing the areas and road networks directly around them. In addition, they are currently operating close to their technical capacity rendering them unable to keep up with demand of servicing the greater Tamworth area into Daruka and Woonooka. Given the aforementioned, these facilities are unsuitable to deliver the desired mobile coverage to the target area, being the Daruka and Woonooka townships. Other existing mobile telecommunications facilities providing service to this area are outlined in Section 3.1 of this report.

Coverage is the ability for a base station to provide service to an area, whereas capacity is the ability for a base station to deal with mobile traffic, or demand. Voice and data connections are known as traffic and each base station has a limit as to the amount of traffic it can carry. When traffic grows, new technologies like 5G and additional technology is added to the existing site. When a site has been upgraded to its technical limit, and when the capacity is tested, often at peak times, customers then experience inconsistent service, call dropouts and/or slow data speeds.

This facility should also assist with providing in-building coverage (depth of coverage indoors) to home-businesses and buildings currently suffering from poor service. The expectation of customers increasingly involves consistent quality and depth of service in any location they wish to use their phone or device, customers no longer accept having to go outside to use their mobile phone or device.

The need to deliver quality service in the local area in conjunction with the exponential growth in the demand of network data and broadband services (such as tablets, smart phones and data cards) means that services will become poor unless the facility at this location is successfully developed.

Telecommunications carriers such as Telstra must continue to provide a level of service that customers have come to expect. This development is therefore required to meet the obligation of licensed telecommunications carriers to provide adequate coverage and service to its customers.

2.5 Consequences of not proceeding

The consequences of the proposal not proceeding would be:

- Continued poor coverage in Daruka and surrounding areas including Woonooka;
- Continued poor telecommunications services in the general locality, including slow data speeds, poor reception and unexpected call dropouts;
- Lack of improvement in most up-to-date mobile network services including 5G in the area; and
- Reduced competition in the telecommunications industry, potentially resulting in uncompetitive practices, increased costs to consumers and reduced levels of service to customers.



3 Site Selection and Justification

As part of Amplitel's site acquisition procedure, a comprehensive site selection process has been undertaken in order to find an appropriate location for the new facility in Daruka. This included looking for 'colocation' opportunities, in accordance with the *Telecommunications Code of Practice 2021*, as well as low impact solutions and new Greenfield sites.

The specific constraints of this project, including the built environment and the coverage target area resulted in limited site options. However, the selection process involved a number of stages and entailed identifying potential candidates by assessing each under the following considerations:

Planning:

- In accordance with the relevant Acts and Environmental Planning Instruments (EPI);
- Acceptability of the proposal to Tamworth Regional Council and the local community;
- Location in relation to sensitive land uses such as schools, childcare centres, hospitals and nursing homes which on some occasions is difficult to avoid;
- Visual aspect and amenity;
- Compliance with the EME standards mandated by the Australian Communications and Media Authority (ACMA);
- Opportunities to collocate facilities where possible; and
- Low impact solutions.

Property:

- Availability of suitable land and likelihood of the owner entering into a tenure agreement and providing access during construction and operation.

Engineering:

- Feasibility of construction and availability of infrastructure such as access, power and fibre.

Radio frequency coverage and objectives:

- Ability to be linked to the existing Telstra network and meet the radio frequency coverage objectives for the area.

3.1 Options Considered

Opportunities to Collocate

State, Federal and Local government legislation encourages the use of existing telecommunication facilities for the colocation of antennas. In particular, Principle 2 of the Telecommunications Facilities Guideline, Including Broadband (**the Guideline**) recommends that new telecommunications facilities be co-located wherever practical. This could be achieved by locating the new facility on an existing telecommunications tower or extending the height of an existing tower to accommodate additional communications infrastructure. If it is not feasible, consideration should be given to locating the new facility on an existing building, utility structure or other structure.

As such, Amplitel's standard site selection process flags potential colocation options during its initial stage of candidate selection.

The first step with respect to colocation is to identify existing telecommunications towers/poles within or in the vicinity of the target area and assess the potential of each existing tower/pole to accommodate an additional telecommunications infrastructure capable of meeting the desired service requirements for the target area.

Due to the specific coverage constraints, there is a lack of collocation options. As depicted below in **Figure 4** and **Table 1** the closest existing telecommunication facilities are unsuitable and as such a new facility is required to improve coverage and capacity to the Daruka target area.

Figure 4: Existing sites within 3.3km of the proposed site (source: Google Maps).



Table 1: Opportunities to Collocate

RFNSA	Description	Structure Owner	Existing Equipment	Distance	Address	Reason for dismissal
2340037	Existing 40m monopole	NBN Co.	NBN Co.	1.8km	110 Woonooka Road, Tamworth NSW 2340	Unable to achieve the specific coverage objectives required to service the targeted area and is required to service other areas.

The above potential site is located more than 1.3km from the centre of the target area and at such distances, Telstra's internal telecommunications consultants have confirmed that they are not capable of meeting the service needs of the target area and are appropriately assessed as being too far away to be a viable location for consideration. Several of these sites are also operating at or close to capacity.

The assessment of the existing facility demonstrates it does not provide an opportunity for a feasible co-location that would meet the service needs of the target area. As co-location is not practical, Telstra proposes to construct a new facility on the subject property.

Principle 5 of the Guideline requires that a proponent undertake an alternative site assessment for new mobile phone base stations. A specific number of alternative sites is not nominated. Principle 5 recommends that an adequate number of alternative sites be assessed "as a demonstration of good faith." These options are discussed further below.

Low Impact Solutions

Once it was understood that a new site was required, an assessment process was undertaken to identify any potential low impact solutions in the area. These solutions include utilising existing tall structures like buildings. Telstra advised that to service the target area, a height of 30m, the equivalent of a 9-10 storey building is required to meet service and coverage requirements. Existing Daruka buildings typically do not exceed 2-3 storeys in height, as such a low impact roof top site was not a possibility.

Greenfield Sites

When the site assessment process reveals that a Greenfield site is the only viable option, consideration is given to the most appropriate sites located within rural, industrial and infrastructure land characteristics are preferred. Locations within large open space areas ranks close behind these other land use categories. Locations within residential areas close to dwellings should be avoided where possible, in order to optimise community acceptance and minimise impacts on residential amenity and are typically only considered where no other more suitable locations are available.

Other considerations involve the ability to service the target area, availability of tenure, the physical and special requirements for the construction of such a facility as well as access for maintenance purposes and access to power and fibre. The potential impact of the proposed development upon visual amenity and surrounding residential development has also been considered.

Telstra's site selection process was limited due to the specific coverage constraints meaning the search area was restricted. **Figure 5** and **Table 3** below provide an overview of the greenfield candidates considered as part of this proposal.

Figure 5 Aerial View of Greenfield Options Considered (Prime - C)



Table 3: Greenfield Candidates

Candidate	Site Details	Facility Type	Description
Candidate A	110 Woonooka Road, Tamworth NSW 2340	Existing NBN Co. 40m monopole	Unable to achieve the specific coverage objectives (see above).
Candidate B	61 Woonooka Road, Daruka NSW 2340 (1/-/DP1271279)	30m monopole	The landowner responded saying they were not interested and that the proposal would not be supported. As such this candidate was discounted as tenure could not be secured with the landowner.
Candidate C	30 Condowie Road, Daruka NSW 2340 (107/-/DP753841)	40m monopole	This site was selected as the prime candidate and will be discussed in further detail in Section 3.2 of this report.
Candidate O	850 Daruka Road, Daruka NSW (15/-/DP844939)	40m monopole	The candidate was rejected because the property was classified as community land and could not be used for the desired purpose.

3.2 Preferred Option

As demonstrated from the site selection process a number of alternative sites were investigated, which has concluded that Candidate C at 30 Condowie Road, Daruka is the most appropriate location for the new facility. The preferred nominated candidate was selected based on buildability, radiofrequency objectives and ability to secure tenure, as noted in Section 3 of this report.

In summary, the site selection process set out above highlighted the following about the proposed site:

- The site is the most practicable solution to addressing the coverage gap and capacity issues in the Daruka area;
- It will meet the radio frequency objectives of Telstra's network, giving the required coverage within the area by allowing all three antenna sectors to operate effectively;
- The preference is always to located facilities away from residential uses, however after significant scoping of the area a new facility at the proposed location was the only feasible option to provide coverage and capacity to the area;
- It is acknowledged the proposal will have a visual presence in the immediate area,

A thorough examination of potential telecommunications base station sites in the surrounding area has been undertaken. There were no suitable options for colocation, and other potential Greenfield sites were ruled out because of either inability to secure tenure or RF issues.

Amplitel has concluded that a new facility at the above-described location at 30 Condowie Road, Daruka is the most appropriate location in order to service the greater Daruka area.



4 Environmental Assessment

Federal and State legislation and guidelines have been created to guide the development of telecommunications infrastructure in Australia.

4.1 Commonwealth Legislation

Telecommunications Act 1997

The *Telecommunications Act 1997* (TA) came into operation in July 1997. The TA sets up a framework for regulating the actions of telecommunications carriers and service providers. Telstra is a licensed carrier under the TA.

Schedule 3 – Carriers’ powers and immunities, of the TA, specifies ‘authorised activities’ that a carrier is empowered to carry out without approval under NSW legislation. These activities include the inspection of land, and the installation and maintenance of certain facilities.

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

“the facility being a low-impact facility (as defined by the Telecommunications (Low-Impact Facilities) Determination 1997 (as amended)”.

In this case, the proposal involves the installation of a new monopole structure, and therefore does not constitute a low-impact facility under the *Telecommunications (Low-Impact Facilities) Determination 1997* (as amended). As the proposed facility does not meet the criteria mentioned above, the proposal is not exempt from State and local planning laws and must obtain development consent under NSW State legislation from the consent authority.

The consent authority in this instance is **Tamworth Regional Council**.

Telecommunications Code of Practice 2021

Under the *Telecommunications Act 1997* the Government established the Telecommunications Code of Practice 2021, which sets out the conditions under which a carrier must operate. Part 1A.4 of the Telecommunications Code of Practice 2021 sets out the design, planning and installation requirements for the carriers to ensure the installation of facilities is in accordance with industry ‘best practice’. This is required to:

“... minimise the potential degradation of the environment and the visual amenity associated with the facilities.”
[Section 1A.4(3)]

Best practice also involves the carrier complying with any relevant industry code or standard that is registered by the Australian Communications Authority (ACA) under Part 6 of the Act.

The siting and design of this proposal has taken place in accordance with Section 3 (Planning and Siting) of the Australian Standard, Siting of Radiocommunications Facilities (AS 3516.2). The proposed site and design was selected after extensive search and analysis of potential candidates and the site was considered to provide an optimal environmental and network solution. The proposed design achieves minimal visual impact while meeting the technical coverage requirements for the site.

On balance it is considered that the proposed site is an appropriate planning solution in accordance with site selection criteria expressed in the *Telecommunications Act 1997*, and the relevant legislative and regulative requirements of federal, state and local authorities.

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 (see **Table 1** below). No consultation external to that undertaken in the Development Application process is required under the Code.

Table 1: Application of the Industry Code C564:2020 precautionary approach to mobile phone Radiocommunications infrastructure placement and design

Subclause	Response
Clause 4.1 Site Selection	
4.1. <i>Clause 4.1 applies if a Carrier proposes to select a new site for the deployment of Mobile Phone Radiocommunications Infrastructure.</i>	Clause 4.1 Applies to this proposal
4.1.1. <i>A Carrier must have written procedures for site selection for Mobile Phone Radiocommunications Infrastructure in relation to factors contained in clause 4.1.4 and make them available to the public on request.</i>	Written procedures have been developed and will be made available to members of the public on request.
4.1.2. <i>Once the preferred option has been selected, the Carrier must make available to the public on request the summary of the sites considered and the reasons for the selection of the preferred option.</i>	The site selection summary will be made available to any member of the public should they request it.
4.1.3. <i>The Carrier must comply with its procedures as per clause 4.1.1.</i>	All procedures have been complied with.
4.1.4. <i>The Carrier must ensure that its written procedures for new site selection require it must have regard to:</i> (a) <i>the reasonable service objectives of the Carrier including:</i> (i) <i>the area the planned service must cover;</i> (ii) <i>power levels needed to provide quality of service;</i> (iii) <i>the amount of usage the planned service must handle;</i>	(a) (i) The primary requirement for installing the base station at the proposed location is to improve coverage and capacity in the Daruka area. (ii) The power levels of Telstra's facilities are set as low as possible to meet the required service objective, the facilities also automate their power requirements in response to the demand and number of connections at any one time therefore maximising power efficiency.



	iii) The proposed base station ensures that long-term, consistent, high-quality voice and mobile data services are provided in Daruka.
(b) <i>minimisation of EME exposure to the public;</i>	(b) The proposed design and location of the facility means its antennas are excluded from direct public access. Telstra facilities power levels are set as low as possible to meet the required service objective, the facilities also automate their power requirements in response to the demand and number of connections at any one time therefore maximising power efficiency and minimising EME emissions. Even at full power (see Section 6.10) exposure limits to the public are no greater than 0.30% of the APRANSA EME Standard (see Appendix B)
(c) <i>the likelihood of an area being a community sensitive location. (Examples of sites which may be considered to be sensitive include, residential areas, childcare centres, schools, aged care centres, hospitals and regional icons);</i>	(c) The nearest residential dwelling is approximately 40m from the proposal on the adjacent land. No other community sensitive locations are identified.
(d) <i>the objective of avoiding community sensitive locations;</i>	(d) The avoidance of community sensitive locations was a key factor in determining the proposed location as being suitable for the facility. However, after extensive scoping of the area the proposal is the only feasible location to provide coverage and capacity to the area.
(e) <i>relevant state and local government telecommunications planning policies;</i>	(e) All relevant state and local government planning policies have been considered regarding the proposal i.e. <i>Environmental Planning and Assessment Act 1979, State Environmental Planning Policy (Infrastructure) 2007, NSW Telecommunications Facilities Guideline including Broadband 2010, Tamworth Local Environmental Plan 2010</i> – see Section 4.3
(f) <i>the outcomes of consultation processes with Councils and Interested and Affected Parties as set out in clause 6.7;</i>	(f) The consultation process will be done in accordance with the development application process.
(g) <i>the heritage significance (built, cultural and natural);</i>	(g) The proposed area is not a listed Heritage Item nor does it contain items of Aboriginal heritage – see Section 6.4
(h) <i>the physical characteristics of the locality including elevation and terrain;</i>	(h) Daruka is relatively flat with some variation in elevation throughout the town. The proposal is located on one of the towns higher points.
(i) <i>the availability of land and public utilities;</i>	(i) The proposal is located on a private block, there were no public utilities available.



(j) <i>the availability of transmission to connect the Mobile Phone Radiocommunications Infrastructure with the rest of the network, e.g. line of sight for microwave transmission;</i>	(j) The facility will utilise existing fibre at the property to obtain connectivity to the surrounding Telstra Network.
(k) <i>the radiofrequency interference the planned service may cause to other services;</i>	(k) The proposed location ensures that there will be no interference with any existing services.
(l) <i>the radiofrequency interference the planned service could experience at that location from other services or sources of radio emissions;</i>	(l) The proposed location ensures that there will be no interference with any existing services.
(m) <i>any obligations and opportunities to co-locate facilities; and</i>	(m) Collocation options were either not viable or too far away to meet the objectives of this proposal.
(n) <i>cost factors.</i>	(n) The cost factors are within the normal scope of a standard facility of similar design, location and scale.

Clause 4.2 Mobile Phone Radiocommunications Infrastructure Design

Subclause	Response
4.2. <i>Clause 4.2 applies if a Carrier proposes to design Mobile Phone Radiocommunications Infrastructure.</i>	Clause 4.2 applies to this proposal.
4.2.1. <i>The Carrier must have written procedures for designing Mobile Phone Radiocommunications Infrastructure.</i>	Written procedures have been developed by Telstra.
4.2.2. <i>The Carrier must comply with its procedures as per clause 4.2.1 above</i>	All procedures have been complied with
4.2.3. <i>With the objective of minimising unnecessary or incidental RF emissions and exposure, the procedures must require that, in designing Mobile Phone Radiocommunications Infrastructure, the Carrier have regard to:</i>	(a) The base station is proposed to provide improved coverage and capacity in Daruka. The base station will ensure capacity is enhanced and that better quality services to customers are retained for the future.
(a) <i>the reason for the installation of the infrastructure, considering – coverage, capacity and quality;</i>	(b) The antennas have been positioned to minimise the obstruction of radio signals as required.
(b) <i>the positioning of antennas to minimise obstruction of radio signals;</i>	(c) The antennas will be located atop a 30m monopole with required EME signage.
(c) <i>the objective of restricting access to areas where RF exposure may exceed limits of the EMR standard;</i>	(d) (i)-(ii) The site requires a macro cell with directional antennas to meet its coverage objectives.
(d) <i>the type and features of the infrastructure that are required to meet service needs including:</i>	(e) Telstra facilities automate power in response to the demand and number of connections.
(i) <i>the need for macro, small scale infrastructure; and</i>	
(ii) <i>the need for directional or non-directional antennas.</i>	
(e) <i>the objective of minimising power whilst meeting service objectives; and</i>	



(f) <i>whether the costs of achieving this objective are reasonable.</i>	(f) The cost of achieving the objective is reasonable.
4.2.4. <i>The Carrier must make site EME assessments for Mobile Phone Radiocommunication Infrastructure in accordance with the ARPANSA prediction methodology and report format (as referenced in Appendix B)</i>	The supplied EME report (Appendix B) meets the APRANSA EME Report requirements.
4.2.5. <i>The ACMA may request a copy of the site EME estimate, and the Carrier must provide the estimate to the ACMA within two weeks of the request being made.</i>	Any requests will be complied with within two weeks of the request being made.

State Legislation

NSW Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (the Act) is the primary statute regulating the environmental planning and development in NSW. The application has been prepared with consideration for section 4.15 of the EP&A Act.

State Environmental Planning Policy (Transport and Infrastructure) 2021

The *SEPP (Transport and Infrastructure) 2021* governs telecommunications deployment in New South Wales. This development is defined as a 'Telecommunications Facility' under Clause 2.140 of the SEPP.

The proposed development does not fall within the parameters to be considered Exempt or Complying Development under the SEPP and will require development consent.

The permissibility of the development is established under Clause 2.143(1) of the SEPP, which provides that telecommunications facilities can be deployed on any land with consent. As the works are not being done on behalf of a Public Authority (per Clause 2.141) and are not considered Exempt Development, the works are permissible with the consent of Council.

Clause 2.143(2) requires that the consent authority must take into consideration any guidelines concerning site selection, design, construction and operation of telecommunications facilities issued by the Planning Secretary. The current guidelines are the NSW Telecommunications Facilities Guideline, Including Broadband (October 2022). Compliance with the principles is outlined in section 6.2.3 of this document.

NSW Telecommunications Facilities Guideline including Broadband (October 2022)

The NSW Telecommunications Facilities Guideline including Broadband has been issued by the Director General. Section 2.2 of the Guideline must be taken into consideration.

Table 2 below assesses the proposal's consistency with these principles



Table 2: Responses to principles 1- 4 Section 2.2 of the NSW Telecommunications Facilities Guideline including Broadband

Principal	Response
Principle 1: Design and site telecommunications facilities to minimise visual impact.	
(a) As far as practical, integrate a telecommunications facility that is mounted on an existing building or structure with the design and appearance of the building or structure. (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. (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. (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. (e) Locate and design a telecommunications facility in a way that responds to its setting (rural, residential, industrial or commercial). (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. (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. (l) Accord with all relevant industry design guides when siting and designing telecommunications facilities. (m) Assess potential visual impact in alternative site assessments.	(a) There were no existing buildings or structures suitable for colocation. (b) Include visual impact assessment (c) The facility will be finished in a non-reflective grey, which has been found to be the least conspicuous against the majority of backgrounds. (d) Internal ancillary equipment will be located within a new equipment shelter. (e) The facility is located within an rural urban setting amongst residential and commercial uses. (f) The proposed facility will not impact a heritage listed item or area. The nearest heritage item is located more than 2.5km from the proposed site. (g) Care has been taken to minimise the negative impact of the proposal on surrounding sightlines. The height of the facility has been kept to the minimum required to achieve coverage objectives. A slimline monopole has been used rather than a lattice tower to reduce the visual footprint of the proposal. (l) the proposal complies with all relevant industry guidelines and design standards as demonstrated by this Statement of Environmental Effects report. (m) See Table 3
(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) The proposal does not require the removal of any vegetation. Council will be consulted as part of this development application.



(i) Remove redundant telecommunications facilities and restore the site to the condition it was in prior to the facility's construction.	(i) N/A
(j) Remove redundant components of existing facilities after upgrades.	(j) The proposal will comply with the BCA and complies with relevant Industry Design Guides.
(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) Co-location option was investigated and outlined in Section 3.1 of this report. However, it was not a viable option.

Principle 2: Co-locate telecommunications facilities wherever practical

(a) As far as practical, locate telecommunications lines underground or within an existing underground conduit or duct.	(a) The fibre and power network connections will be taken from the nearest available points underground to the facility.
(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) The current proposal, as previously noted, was only selected after co-location opportunities on existing telecommunications facilities had been totally exhausted. The proposal has been designed to retain the smallest, slimmest and neatest visual profile possible to minimise any visual amenity impacts on the surrounding area while achieving the required coverage.
(c) Consider extending an existing tower as a practical co-location solution to new towers.	(c) existing facilities in the vicinity are not able to be extended due to structural requirements or are too far away from the intended coverage area for an extension to be effective.
(d) Demonstrate that co-location is not practicable ¹ if choosing not to co-locate a facility.	(d) Telstra have conducted an exhaustive assessment of prospective co-location options, as identified in section 3 of this report. No suitable options were identified.
(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) Telstra have conducted an exhaustive assessment of prospective co-location options, as identified in section 3 of this report.

Principle 3: Meet health standards for exposure to radio emissions

(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) The proposed facility will comply with the ARPANSA standard in relation to human exposure to EME. An EME report has been completed and is found in Appendix B. This report demonstrates compliance with the ARPANSA standard for the operation of a radio communications facility in Australia.
(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) The proposal is for a mobile phone network and is subject to the requirements of the Industry Code C564:2020 Mobile Phone Base Station Deployment with regard to the design, siting and notification. An EME report has been completed as per the required ARPANSA format and is found in Appendix B.

Principle 4: Minimise disturbance and risk, and maximise compliance

(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) The provisions of the *Civil Aviation Regulations 1988* and the *Airports (Protection of Airspace) Regulations 1996* were considered during the design and siting process.

The site is located approximate 13.9km from Tamworth airport. The height of the structure does not breach the airport's OLS.

(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) Telstra will operate the radio facility within its own frequency spectrums and the facility will not cause any interference with other networks. All operating antennas will use the frequencies assigned to Telstra.

(c) Carry out the telecommunications facility and ancillary facilities in accordance with any manufacturer's installation specifications.

(c) The facility will be established and operated within the applicable specifications (if any) of the manufacturers.

(d) Protect the structural integrity of any building or structure on which a telecommunications facility is erected.

(d) N/A – new monopole is being proposed

(e) Erect the telecommunications facility wholly within the boundaries of a property as approved by the relevant landowner.

(e) The proposed facility will be erected wholly within the boundaries of the property.

(f) Ensure all construction of a telecommunications facility accords with Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom 2004), or its replacement.

(f) The activities associated with construction and installation will be conducted in accordance with sediment controls, erosion controls, stormwater controls and other controls outlined in the Blue Book (refer Section 6.6)

(g) Mitigate obstruction or risks to pedestrians or vehicles caused by the location of the facility, construction activity or materials used in construction.

(g) The majority of construction activities will take place within the lot. There will be no risks to traffic or pedestrians during the operation of the proposal. Traffic management shall be employed during construction where necessary and any necessary permits from Council will be obtained.

(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) All work associated with the development and installation of the facility will be between 7.00am and 6.00pm, Mondays to Saturdays, with no work on Sundays and public holidays and/or as conditioned in the consent by Council.



(i) <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> (j) <i>Guard open trenching in accordance with Australian Standard Section 93.080 – Road Engineering AS1165 – 1982 – Traffic hazard warning lamps.</i> (k) <i>Minimise disturbance to flora and fauna and restore land to a condition similar to its condition before the work was carried out.</i> (l) <i>Identify any potential impacts on threatened species and communities in consultation with relevant authorities and avoid disturbance to identified species and communities where possible.</i> (m) <i>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</i> (n) <i>Street furniture, paving or other existing facilities removed or damaged during construction should be reinstated (at the telecommunications carrier's expense) to at least the same condition as that which existed prior to the telecommunications facility being installed.</i>	(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 (refer Section 6.5) (j) Any required trenching associated with the proposal will be covered or filled so that it is not open overnight. (k) The minimum possible vegetation removal will be undertaken in construction of the facility and access track. All land surrounding the proposal will be restored to a condition that is similar to its condition before the work was carried out. (l) The proposal is located on a privately owned clearing. Impacts of threatened species and communities are not expected. (m) A search of the AHIMS has been completed and there are no known items or places of archaeological significance on the site or in the immediate surrounding area (Appendix C) additionally consultation with the Local Aboriginal group and site visits by community members have not identified any culturally significant items in the vicinity of the proposed site. The area has not been highly disturbed previously. Notwithstanding, if any suspicious items or objects are found during excavation, work will cease immediately and the OEH will be consulted and works will not re-commence until OEH have granted their consent. (n) If disturbed, all street furniture, paving and walkways will be reinstated at the end of construction to the standard and condition they were in prior to the construction work beginning.
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Principle 5: Undertake an alternative site assessment for new mobile phone base stations

(a) Include adequate numbers of alternative sites in the alternative site assessment as a demonstration of good faith.

(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.

(a) Five low impact and greenfield sites were investigated during the site selection process. This number is considered an adequate number of sites typically investigated considering the lack of existing sites in the area.

(b) Each site investigated during the initial candidate search is described in detail in section 3.1 and the reasons the site was unsuitable for the proposal have been clearly identified.

4.3 Tamworth Local Environmental Plan 2010

Zoning Provisions

The proposed location is subject to land use controls under the *Tamworth Local Environmental Plan 2010* (LEP). Under the LEP the proposed site is zoned R5 Large Lot Residential (Figure 6). Telecommunications facilities are permitted only with consent from Tamworth City Council.

Figure 6 LEP Zoning Map (Source: NSW Planning Portal Spatial Viewer)

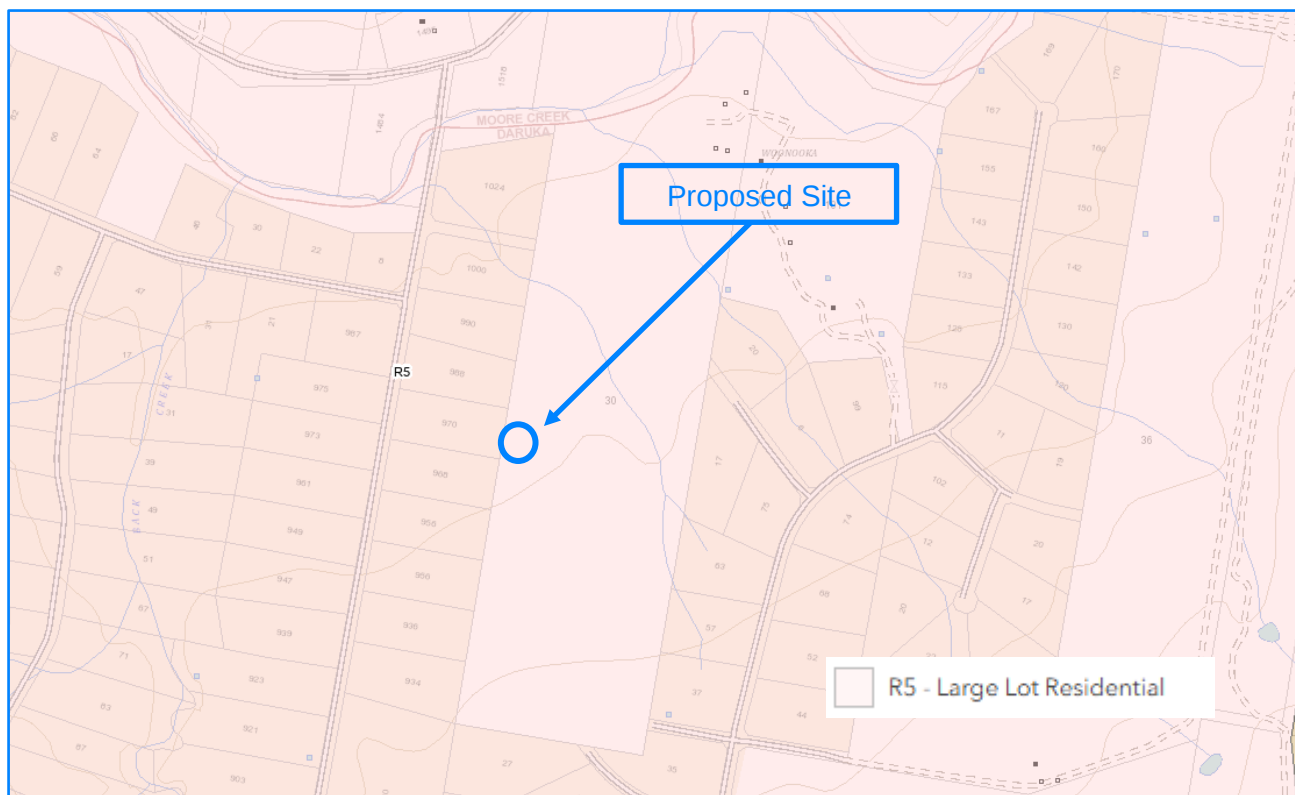


Table 3 below sets out the objectives of the zone and an assessment of the proposal against these objectives.

Table 3: Assessment of proposal against objectives outlined in LEP R5 Large Lot Residential Land Use Table

Objective	Assessment
To provide residential housing in a rural setting while preserving, and minimising impacts on, environmentally sensitive locations and scenic quality.	The proposed facility has been designed to be as inconspicuous as possible by: - keeping its height to a minimum. - positioning ancillary equipment such as RRUs behind panel antennae to have less visual impact. - finishing the monopole in non-reflective neutral colour.
To ensure that large residential lots do not hinder the proper and orderly development of urban areas in the future.	The proposed development will not impact on the future use or redevelopment of the land.
To ensure that development in the area does not unreasonably increase the demand for public services or public facilities.	The proposed will not create increased demand for public services or facilities.
To minimise conflict between land uses within this zone and land uses within adjoining zones.	The proposed development will not impact on the current or future use of this or adjoining zones.
To provide a mix of housing that supports and encourages neighbouring equine-related facilities and is compatible with surrounding land uses and activities.	The proposed facility will provide improved network coverage benefiting surrounding land users.

Principle Development Provisions

There are no Principal Development Standards which apply to this development.

Miscellaneous Provisions

There are no Miscellaneous Provision which apply to this development.

Additional Local Provisions

7.2 Earthworks	
Objective	Response
to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land,	The proposed earthworks are minimal and only required for the foundation of the monopole. This will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.
to allow earthworks of a minor nature without requiring separate development consent.	The proposed earthworks are considered minor and should be approved under the current application.
Development consent is required for earthworks unless	Response
Development consent is required for earthworks unless—	The proposed earthworks are necessary to build the foundations of the monopole.



(a) the work is exempt development under this Plan or another applicable environmental planning instrument, or (b) the work is ancillary to other development for which development consent has been given.	
Before granting development consent for earthworks, the consent authority must consider the following matters— (a) the likely disruption of, or any detrimental effect on, existing drainage patterns and soil stability in the locality, (b) the effect of the proposed development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both, (d) the effect of the proposed development on the existing and likely amenity of adjoining properties, (e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to and potential for adverse impacts on any watercourse, drinking water catchment or environmentally sensitive area.	There will be no disruption to existing drainage patterns. The proposed development will not impact the future use or redevelopment of the land. No fill is required. Any waste excavated soil will be disposed of in accordance with statutory requirements. There will be no impact on the amenity of adjoining properties from the earthworks proposed. No fill material other than concrete will be used. Any waste excavated soil will be disposed of in accordance with statutory requirements. An AHIMS check has not identified the potential on any relics being found. The immediate area has been disturbed previously. The proposed facility will be setback approximately 200m from the closest watercourse and will not impact it.

7.6 Airspace operations	
Objective	Response
(a) to provide for the effective and ongoing operation of Tamworth Regional Airport by ensuring the operation is not compromised by development that penetrates the Limitation or Operations Surface for the airport, (b) to protect the community from undue risk from the operation of the airport.	The height of the proposed structure does not breach Tamworth Airport's obstacle limitation surface. The proposed structure will include an aircraft warning light.

5 Environmental Impact Assessment

5.1 Visual Impact

It is acknowledged the site is visually prominent and will be visible from distant viewpoints. The proposed location is the high point of the area and a facility at this location will significantly improve mobile coverage in the area.

To achieve optimal performance, telecommunications facilities require unobstructed visibility in all directions and sited where coverage is required. Locating the facility outside of town centre area would not achieve the required coverage objectives and would not efficiently integrate with the wider Telstra network. The proposed height of the structure is required to achieve Telstra's optimal mobile coverage objectives and the proposed design has minimized the structure height and visual bulk as much as practicable. Furthermore, the use of neutral colours and non-reflective finishes will assist in minimising the structures visibility on the landscape.

We have taken measures to mitigate the visual impact including:

- Using a slimline monopole design that will blend in with existing infrastructure such as street lighting and electrical poles'
- Utilising neutral grey colours that blend in with existing backgrounds;
- Designing the equipment shelter to minimise visual impact;
- Setting the facility back from the Daruka Road frontage helps to reduce the visual impact of the site at ground level.

5.2 Socio – Economic Considerations

The proposed facility will enable excellent mobile network capability, which has now become expected in urban areas to be provided.

These services allow communities to enjoy:

- Greater business accessibility and flexibility, especially for commuters, tradespeople and home-based business;
- Reliable personal safety – maintaining a mobile phone for critical communications and emergencies.
- As an industry telecommunications including mobile broadband has experienced exponential growth for many years now.

The proposed development will enable carriers to remain competitive and increase the choice of mobile telephone services available to consumers. Increased competition in the market brings direct economic benefits for individual consumers and the community as a whole. The development is consistent with the objectives of the TA 1997, namely:

- To promote *"the efficiency and international competitiveness of the Australian telecommunications industry"* (s.3(1)); and
- To ensure that telecommunications *services "are supplied as efficiently and economically as practicable"* (s.3(2)(a)(ii)).

Providing telecommunications services will allow home-based businesses to operate and grow their services. Diversify in both the services they offer, and how these services are marketed – the ability to reliably use social media for promotions is particularly beneficial for local businesses. A strengthened telecommunications network will also allow the local workforce to explore opportunities which were not previously possible, including home businesses and telecommuting. This has become even more of a community expectation due



to the COVID-19 pandemic which has substantially increased the demands on telecommunications networks particularly as more people are now working from home.

Telstra is also responsive to public safety issues. High quality telecommunications services significantly benefit community safety by providing a vital 'first response' tool for emergency services. A strong mobile network is highly beneficial in an emergency situation, as well as more general public safety.

Telstra believe that it is in the public interest to provide a strong, resilient mobile network that, in turn, provides a high quality of service to local communities across Australia. Given the demand for the service, and the benefits noted above, we believe there is a strong justification for the telecommunications site at this location to be constructed.

The proposed facility will thus have a positive impact on the social and economic environment of Daruka.

Effect on Surrounding House Values

Although property values are not an area of consideration by a consent authority, local residents sometimes ask questions on this topic. To date, there is no evidence of any negative impact telecommunications facilities have on property prices. With the many thousands of facilities located all around the country, if an impact was likely, it is expected it would be apparent by now. With the increase of wireless devices, including smart phones, tablets, and mobile data devices the number of fixed line connections is decreasing, to ensure customers have access to high quality services in their home a telecommunications facility cannot be placed outside of the area requiring service.

5.3 Heritage and Cultural Values

Indigenous Heritage

The site is located within Daruka on an undeveloped block of land. As a precaution an AHIMS search was conducted, and the site has not been identified as a site containing items or as an area of Aboriginal Significance (refer to **Appendix C**).

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.

Non-indigenous Heritage

As part of Telstra's site selection process, a heritage and conservation register check is undertaken (including listings on the Register of the National Estate, State Heritage Register, Regional and Local Environmental Plans and database of the EPBC Act 1999).

A search of the following databases was undertaken to identify any items of non-indigenous heritage significance or conservation areas within the site or in the immediate vicinity of the site:

- Australian Heritage Database of the Australian Heritage Council;
- Australian Heritage Places Inventory;
- State Heritage Inventory of the NSW Heritage Office; and
- Heritage Items of the Tamworth Local Environment Plan 2010.

Results of all the above heritage searches conclude that the site is not subject to any heritage significance of Local, State and Commonwealth concern. As such, the proposal is not expected to impact upon any items of non-indigenous heritage. Figure 10 below shows the nearest heritage item is located more than 2.5km from the proposed site.

Figure 10 Local Heritage Items Surrounding the proposal (Source: NSW State Heritage Registry)



5.4 Traffic, Access and Construction Management

The Site will require access via a proposed new 200m long gravel access track off Daruka Road via the road corridor between lots 1 and 2 DP 844939. Correspondence with the Councils engineering team in February 2025 advised the access was possible subject to approval under S138. Council will require the first 50.0m of the track off Daruka Road to be bitumen sealed to ensure gravel is not tracked on to the public road network.

Figure 11 Location of proposed access track (Source: NSW Planning Portal)





During the construction phase, one or two trucks will be used to deliver the equipment, and a crane or Elevated Work Platform (EWP) will be utilised to lift the equipment into place. Accordingly, the proposed facility will not be a significant generator of vehicular traffic and will not adversely impact local traffic flow.

Once constructed, the facility will operate on an unstaffed basis and mostly remotely. As such, operational visits to the site will be minimal and approximately only 4-6 times per year for maintenance purposes. No additional parking spaces have been proposed as there is adequate space on property for maintenance vehicles to park.

5.5 Contaminated Land

A search of the NSW Environment Protection Authority contaminated land database was done 13 September 2024. The subject property was not identified as being contaminated land.

However, if any contaminated soils encountered during the proposed works will be managed in accordance with the relevant guidelines.

5.6 Utility Services

Further identification of utilities would be undertaken during the detailed design stage of the proposal, and any impacts assessed and necessary safeguards implemented as required.

The following mitigation measures would be implemented to ameliorate any impacts on existing infrastructure:

- A 'dial-before you dig' search would be undertaken during the detailed design stage;
- Prior to construction, all infrastructure and utilities would be identified;
- If required, prior to construction, relevant utilities and adjacent residents would be notified of any impending disruptions to services.

When operational, the site will be unstaffed, and does not require utility services such as telephone, water and sewerage.

All services required for the ongoing operation of the base station are capable of being provided to the facility without impacting on the supply or reliability of these services to any existing consumers in the locality.

5.7 Noise and Vibration

The facility will not be a significant generator of noise. Noise produced by the facility is low level noise from the air conditioning units within the equipment shelter. Cooling equipment will only operate when required and will not operate continuously. These are comparable to domestic air condition units and will comply with the background noise levels prescribed by Australian Standard AS1055. The site is setback 100m from the closest residential dwelling and at least 10m from the nearest property boundary. Ongoing noise is not expected to have a significant impact.

Noise and vibration emissions associated with the proposed facility will be limited to the construction phase. Noise generated during the construction phase will be of short duration and will be in accordance with the standards outlined in the *Protection of the Environment Operations (Noise Control) Regulation 2017*. Construction works will only occur as per Council's daily timeframe direction.



5.8 Health and Safety

It is acknowledged that some people are genuinely concerned about the possible health effects of electromagnetic energy (EME) from mobile phone base stations and is committed to addressing these concerns responsibly.

Mobile phone carriers must strictly adhere to Commonwealth Legislation and regulations regarding mobile phone facilities and equipment administered by the Australian Communications and Media Authority (ACMA).

The facility will comply with ACMA EME regulatory arrangements in relation to emission of electromagnetic energy (EME), this specifically being the Radiation Protection Series S-1 (Rev. 1) - Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz (2021) known as RPS-1.

RPS-1. The RPS-1 Standard is set by ARPANSA and is based on the safety guidelines recommended by the International Commission on Non-Ionising Radiation Protection (ICNIRP). ICNIRP has recently undertaken an extensive review of the available scientific evidence and research on EME and health. ICNIRP is an agency associated with the World Health Organisation (WHO).

The Standard operates by placing a limit on the strength of the signal (or RF EME) that Carriers can transmit to and from any network base station. The general public health standard is not based on distance limitations, or the creation of “buffer zones”. The environmental standard restricts the signal strength to a level low enough to protect everyone at all times. It has a significant safety margin, or precautionary approach, built into it. In order to demonstrate compliance with the standard, ARPANSA created a prediction report using a standard methodology to analyse the maximum potential impact of any new telecommunications facility. Carriers are obliged to undertake this analysis for each new facility and make it publicly available.

Importantly, the ARPANSA-created compliance report demonstrates the maximum signal strength of a proposed facility, assuming that it's handling the maximum number of users 24-hours a day.

In this way, ARPANSA requires network carriers to demonstrate the greatest possible impact that a new telecommunications facility could have on the environment, to give the community greater peace of mind. 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.

Using the ARPANSA standard methodology, Optus have undertaken a compliance report that predicts the maximum levels of radiofrequency EME from the proposed facility. The EME Report associated with this site is attached in **Appendix B**. The report shows that the maximum predicted EME levels will equate to **2.50%** of the maximum exposure limit under the Australian Standard.

Carriers rely on the expert advice of national and international health authorities such as ARPANSA and the World Health Organisation (WHO) for overall assessments of health and safety impacts. The WHO advises that all expert reviews on the health effects of exposure to radiofrequency fields have concluded that no adverse health effects have been established from exposure to radiofrequency fields at levels below the international safety guidelines that have been adopted in Australia.

Carriers have strict procedures in place to ensure its mobile phones and base stations comply with these guidelines. Compliance with all applicable EME standards is part of the Carrier's responsible approach to EME and mobile phone technology.

The Australian Chief Medical Officer, Brendan Murphy, issued a statement in January 2020 to provide further assurance of the safety of 5G and other mobile technologies. The statement reads:

“I'd like to reassure the community that 5G technology is safe. There is no evidence telecommunication technologies, such as 5G, cause adverse health impacts.”

The full extent of the statement is available here: <https://www.health.gov.au/news/safety-of-5g-technology>



5.9 Other Impacts During Construction

Air Quality

There is potential for dust generation during the excavation of the pole footings.

During construction all construction areas would be sprayed with water during dry and windy weather to suppress airborne dust generation.

The compound site would be appropriately restored after the completion of works to ensure no ongoing dust generation.

Waste Minimisation and 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. The majority of the waste generated is expected to be excess soil as a result of construction of foundations for the monopole.

Where possible excess soil from the earthworks would be utilised on-site in association with landscaping of the facility, with the remainder disposed of at an approved waste disposal facility.

Other waste such as packaging material will be removed from site.

The operation of the facility will be mostly unstaffed and will not generate any waste during the operational phase.



6 Conclusion

Amplitel propose to construct a new telecommunications facility on the lot at 30 Condowie Road, Daruka. The proposal is considered to be consistent with the requirements of all other relevant planning instruments, legislation and codes relevant to telecommunications development.

This proposal will ensure that mobile telecommunications services in Daruka are brought to the acceptably high standard residents and businesses have come to expect in urban areas. Additionally, the increasing demand for mobile services and data will be supported.

The proposal is considered to be the most prudent approach to fulfilling Telstra's mobile telecommunications coverage and capacity requirements. The proposed facility is considered appropriate for the below reasons:

- The proposal utilises a slimline monopole design that blends into the environment, decreasing adverse visual impact in the area;
- The proposal is also considered the most appropriate solution between the competing demands of planning, coverage, design, property, construction and the expectations of stakeholders;
- The proposal will provide high quality mobile telecommunication service to Daruka, ensuring residents, visitors and businesses in the area experience uninterrupted access to what is now considered an essential service. This will in turn enable socio-economic benefits to the community;
- The facility is designed to provide co-location opportunities for other carriers, decreasing the need for further telecommunication facilities in the area.
- The facility will comply with all Government health standards outlined by ARPANSA.

Given the significant public benefit afforded by the proposal we respectfully request consent be granted to undertake the project.



7 Appendix A

Design Drawings



8 Appendix B

Environmental EME Report



9 Appendix C

AHIMS Search



10 Appendix D

Title Search