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Department of Environment, Land, Water and Planning
Level 8, 8 Nicholson Street
EAST MELBOURNE VIC 3002



SAQ Consulting Pty Ltd
ABN 76 864 757 592
P O Box 50
Clayfield QLD 4011

To whom it may concern:

**RE: Proposed small cell telecommunications facility
Telstra Exchange, 34A Great Alpine Road (lot 2029)
HOTHAM HEIGHTS VIC 3741**

I advise **SAQ Consulting Pty Ltd** acts on behalf of Amplitel and Telstra in respect of this application. The application is to establish a new monopole and small cell at the existing Hotham Village telephone exchange on the Great Alpine Road.

Telstra is experiencing rapidly increasing demand on its mobile network and to meet this demand Telstra needs to invest in additional network sites. This includes the need to make improvements at Hotham Heights, where network demand is high particularly during busy holiday periods.

The existing Telstra telephone exchange at Hotham Heights, has been identified as a suitable location for the installation of a small cell telecommunications facility to provide 4G and 5G (NR/LTE 2600) services to the surrounding area.

Although small cells are usually deployed such that they are attached to existing infrastructure (such as a utility pole or similar, in which case they are often deemed 'low-impact facilities' and require no planning approval), no suitable structures exist at or around the telephone exchange site.

It has also been determined that due to the local terrain, the network improvements sought are best achieved by mounting the small cell on a new 15m-tall pole at the telephone exchange, which is fairly centrally located within the Hotham Village precinct.

The proposed facility cannot be deemed 'low-impact' as it requires a new support structure. The proposed facility is also not a type of facility exempt pursuant to any provisions contained within the *Victorian Code of Practice for Telecommunications Facilities (July 2004)*.

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As such, a planning permit is required. The subject land is located within the Mount Hotham Alpine Resort and is not part of a local government area. The Minister for Planning is the Planning Authority in this instance and the proposal is subject to the provisions of the Alpine Resorts Planning Scheme.

This planning statement sets out the details of the proposal and provides an assessment against the Alpine Resorts Planning Scheme to assist the Department in its determination of the application.

Small Cells

Small cell facilities are small and very low powered facilities often used in residential areas where localised coverage improvements are sought. As noted above, they are often placed on existing infrastructure such as power poles and the like, although not in this particular case.

Small cells can provide improved network coverage and capacity in localised areas where customer demand is high without the need for a full-size base station. Small cells have been a feature of 3G and 4G rollouts that have been deployed over the past two decades and will also be utilised for the 5G network.

As noted above, this particular small cell facility is required to assist in increasing the overall coverage and capacity of the Telstra network in the Hotham Heights area but is not a more typical base-station which commonly have more visual impact with larger antennas, transmit stronger signals and have larger coverage areas.

The proposed small cell will use the latest technology to deliver fast 4G and 5G speeds to the area, improving mobile coverage where Telstra customers expect it – including inside buildings. Telstra small cells use the same safe and well-tested 4G and 5G technologies as Telstra's other mobile sites but they're much smaller and require less energy.

In selecting a suitable location for a new facility, Amplitel and Telstra have had regard to the 'precautionary principle' as set out in Appendix A of the Industry Code C564:2020 for mobile phone base station deployment.

Proposal Details

The proposed installation is comprised of the following and is shown in detail on the attached proposal plans:

- Installation of a 15-metre tall steel monopole near the southern corner of the existing exchange building;
- Three panel antennas (each with dimensions of 214mm x 200mm x 147mm) mounted around the top of the monopole;
- Isolation switch (to allow for the facility to be switched off if required);
- Underground cabling to connect the panel antennas to the exchange building;
- Works in the existing exchange building; and
- Ancillary equipment and works associated with the installation.

Whilst not a relevant planning issue, it is worthy of note that the maximum levels of electromagnetic energy from the proposed facility at 1.5m above the ground is estimated at **0.10%** of the exposure limits mandated by the Commonwealth Government. A copy of the standard form EME report is **attached** for Council's information.

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The proposed infrastructure will be in compliance with the ACMA EME regulatory arrangements. The facility will also comply with Australian government regulations in relation to emission of electromagnetic energy (EME), this specifically being Australian Standard Radiation Protection Series S-1 Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in 2021.

Assessment

The utility pole is located within the *Comprehensive Development Zone* (CDZ2) pursuant to the Alpine Resorts Planning Scheme and requires a permit pursuant to the zone provisions.

Zone Provisions

The purpose of the CDZ zone is stated as :

To implement the Municipal Planning Strategy and the Planning Policy Framework.

To provide for a range of uses and the development of land in accordance with a comprehensive development plan incorporated in this scheme.

Hotham Village is the subject of the *Hotham Village - Mt Hotham - Comprehensive Development Plan 1, July 2017*. The stated purposes for the subject land and surrounds are as follows:

- *To consolidate the Hotham Central precinct as the primary focus for entertainment facilities, community facilities, restaurants, shops and commercial accommodation.*
- *To provide a visible and identifiable public plaza for visitors through the creation of a “Village Centre” or “Central Square”.*
- *To ensure that new development is sited to accommodate safe vehicle and pedestrian circulation within Hotham Central having regard to the proposed realignment of the Great Alpine Road.*
- *To provide safe skier and pedestrian linkages within the precinct through the provision of skier and pedestrian tunnels, overpasses and walkways.*
- *To provide an appropriately designed bus interchange to manage and facilitate ease of vehicle movements within Mt Hotham Central and to and from Mt Hotham overall.*
- *To protect and enhance view lines from Hotham Central by providing appropriate height and setback controls for all buildings.*
- *To ensure that the scale, height and setbacks of development reinforce Hotham Central as the focal point of Mt Hotham.*
- *To ensure building design provides a visually attractive interface with the public domain and the new Hotham Central. ▪ To provide the majority of sites with all-weather road access and on-site car parking.*
- *To maintain vehicular and pedestrian access to existing development and services.*

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The subject lot (2029) is already utilised for the purposes of telecommunications and accommodates the existing telephone exchange and a small curtilage. The land is more or less centrally located in the settlement and the telephone exchange exists solely for the purpose of the Hotham Central precinct which, as the primary focus for the area, is appropriate.

As such, it is entirely appropriate and logical that the proposed monopole and small cell are collocated with the exchange to both consolidate similar infrastructure and allow it to service the area as efficiently as possible given the importance and function of the Hotham Central precinct.

Locating the proposed facility at the telephone exchange and on a discrete parcel of land essentially dedicated to telecommunications purposes also ensures that:

- There is no material impact, visual or functional, on the 'village centre' or 'central square'
- There is no impact on safe vehicle and pedestrian access
- Any impacts on site lines have been minimised and is in any event appropriate having regard for the height limits set out in Figure 1 of the Comprehensive Development Plan
- The proposed facility is set at the rear of the telephone exchange, maximising its separation from the Great Alpine Road
- The proposed facility does not increase the overall parking demand and already has all-weather road access in place

With respect to Figure 1 of the Comprehensive Development Plan, the subject land is located within the (indicative) 4-storey height limit area, shown below as a red dot.



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Although having much less overall bulk than a 4-storey building, the proposed structure at a height of 15m above ground is roughly in accordance with this height limit, given that a 4-storey building would occupy approximately 3.5-4 metres per storey including the roof.

In terms of the development guidelines (some of which are not readily applicable to a telecommunications facility):

- The facility is well set back from Great Alpine Road and greater than the 6-metre minimum setback
- Has minimal impact on site coverage given its small footprint
- Is of an appropriate height having regard for the desired maximum building height
- Consists of materials (monopole, antennas, cabling and ancillary equipment) that can be finished such that it is of 'earthy' tones or similar
- Does not require any additional carparking or changes to existing access

With respect to the 'additional' design criteria:

- The proposed facility has only a very small 'roof' and surface area and is not likely to encourage any significant build-up of snow
- No existing pedestrian/skier access is affected
- Long-range views are not materially affected with the proposed height of the structure in accordance with the maximum height for the selected location
- There are no additional infrastructure requirements (such as waste or similar) arising from the proposed development

With respect to the Decision guidelines:

- Snow shed will be materially unaffected
- The proposal will not unreasonably affect the amenity of adjacent buildings (which it is set well away from) or public areas
- The proposed facility has minimal bulk
- The proposal does not affect vehicle or pedestrian access within the precinct
- Additional carparking is not required

As such, the proposed facility is generally in accordance with the Comprehensive Development Plan requirements and provides an improved level of essential infrastructure to the area.

The proposal and its location are also subject to Schedule 2 of the Comprehensive Development Zone (Alpine Recreation). The purpose of the schedule is set out as follows:

- *To identify areas associated with the development and use of an alpine resort on which passive and active recreation occur.*
- *To enable the development and the use of the land which is in accordance with sound environmental management and land capability practices, and which takes into account the significance of the environmental resources.*
- *To minimise impacts on significant landscapes.*
- *To minimise impacts on areas of significant vegetation.*
- *To minimise impacts on habitat and habitat corridors for indigenous fauna*

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With respect to the listed purpose of the schedule:

- The proposed facility will be located wholly within the existing lot (2029), which is used solely for the purposes of telecommunications, and as such does not affect the use (existing or future) of any other land
- The subject land is capable of accommodating the proposed facility and there is material demand on environmental resources for its construction or operation
- The slim nature of the monopole (the height of which is generally in accordance with the Comprehensive Development Plan) minimises impacts on significant landscapes
- There is no impact on significant vegetation or habitat

As such, the proposal is consistent with the purpose of schedule 2. Further, as set out above under the provisions of the Comprehensive Development Plan, the proposed facility is consistent with (or has no material impact on) the matters set down in the schedule, specifically 6.1 General issues, 6.2 Environmental issues and 6.3 Design and siting issues.

As noted above, there are no impacts on vegetation or carparking demand and as the proposed structure is immediately adjacent the telephone exchange there are no significant environmental issues arising.

Accordingly, having had regard for all the relevant provisions of both the Planning Scheme and the Comprehensive Development Plan, the proposed facility is considered appropriately located and designed to both fulfill its purpose of providing improved telecommunications services to the Hotham Village area and minimise its impacts (both visual and functional) on the subject land, adjoining land and the precinct more generally.

It is also appropriate to consider other aspects of the planning scheme directly relevant to infrastructure and telecommunications, namely:

- Part 19 of the planning scheme, which deals with infrastructure and telecommunications infrastructure specifically at 19.03-4
- Clause 52.19 of the planning scheme, which deals specifically with telecommunications facilities

An assessment against these provisions is set out below.

It is also relevant to consider the relevant provisions of the *Victorian Code of Practice for Telecommunications Facilities (July 2004)*.

Overlays

Two overlays affecting the proposed location on the road reserve, namely the Bushfire Management Overlay and the Erosion Management Overlay.

Given the proposed facility is located on the existing exchange lot, is a relatively minor addition and does not increase the risk of bushfire or erosion to the subject land, surrounding land or people in the vicinity, there is no material issue arising from the proposal with respect to these matters.

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In any event no permit is triggered by the BMO (clause 44.06-2). It does appear a permit is triggered by the provisions of the EMO/EMO1 schedule, the proposed works are minor and wholly contained within the telephone exchange lot and there are no provisions of requirements of the EMO/EMO1 schedule that would be fatal to the subject application.

Part 19

Part 19 of the planning scheme deals with infrastructure requirements and is broad in its application. Telecommunications are dealt with in 19.03-4.

The Objective set out at 19.03-4 states:

“To facilitate the orderly development, extension and maintenance of telecommunication infrastructure.”

A number of strategies are also listed, which state:

- *Facilitate the upgrading and maintenance of telecommunications facilities.*
- *Ensure that modern telecommunications facilities are widely accessible to business, industry and the community.*
- *Ensure the communications technology needs of business, domestic, entertainment and community services are met.*
- *Do not prohibit the use of land for a telecommunications facility in any zone.*
- *Encourage the continued deployment of broadband telecommunications services that are easily accessible by:*
 - *Increasing and improving access for all sectors of the community to the broadband telecommunications trunk network.*
 - *Supporting access to transport and other public corridors for the deployment of broadband networks in order to encourage infrastructure investment and reduce investor risk.*

Ensure a balance between the provision of important telecommunications services and the need to protect the environment from adverse impacts arising from telecommunications infrastructure.

Planning should have regard to national implications of a telecommunications network and the need for consistency in infrastructure design and placement.

The proposed facility will provide improved 4G and 5G services to the surrounding area and the local road network. The proposed facility has been collocated with the existing telephone exchange.

The height of the proposed monopole and very modest extent of equipment proposed to be attached ensures there is an appropriate balance between the need for the facility and its impact on the locality and environment, including any views from existing building and public areas.

Accordingly, the objective and the overall strategies of 19.03-4 are met by the proposal.

Clause 52.19

The planning scheme also specifically mentions telecommunications facility at 52.19.

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The key purpose of clause 52.19 is to ensure telecommunications facilities:

- *Meet the communication needs of the community;*
- *Ensure the approach to the assessment of such facilities is consistent;*
- *Minimise impacts on amenity.*

The need for the facility, its benefits and likely impacts on amenity have already been set out above and demonstrate consistency with the desired outcomes of clause 52.19 – in particular the requirement to meet the communications needs of the community and minimise impacts on amenity.

Victorian Telecommunications Code of Practice (July 2004)

With respect to the *Victorian Code of Practice for Telecommunications Facilities* ('the Code'), the proposed facility is not one which meets the requirements set out in Section 5 of the Code and therefore requires a permit.

With respect to the Principles set out in Section 4 of the Code, I note the following:

Principle 1 - *A Telecommunications facility should be sited to minimise visual impact.*

- The proposed facility is a relatively short monopole and attached small cell, which consists of a small amount of equipment of very modest dimensions, thereby inherently minimising visual impact;
- There are no impacts on heritage items or values;
- The proposed facility is collocated with the existing telephone exchange;
- Aside from the monopole there is no ground-based equipment or additional building associated with the facility;
- No street trees (or vegetation) will be lopped, pruned or removed; and
- The location of the proposed facility does not materially impact on significant views and has minimised its impact in this regard.

Principle 2 - *Telecommunications facilities should be co located wherever practical.*

- The proposed facility is located with an existing telecommunications facility, being the telephone exchange.

Principle 3 - *Health standards for exposure to radio emissions will be met.*

- As with all mobile telecommunications facilities in Australia, the proposed facility is required to comply at all times with the relevant Radiation Protection Standard and once operational must have this compliance certified by an accredited person. An EME report for the proposed facility has been previously provided to Council.

Principle 4 - *Disturbance and risk relating to siting and construction should be minimised. Construction activity and site location should comply with State environment protection policies and best practice environmental management guidelines.*

- The subject land already has existing vehicular access and there will be no unreasonable danger or impediment to traffic or pedestrian movement;
- No remnant flora or fauna will be removed or disturbed;



- Construction will occur at appropriate times (and can be conditioned to ensure compliance if desired); and
- As part of any construction, any damage caused to public infrastructure will be remediated back to its original condition.

As such, the need, siting and design of the proposed facility demonstrates a high level of compliance with the Principles and intent of the Code.

Conclusion

The proposed monopole and Telstra small cell are sited and designed to provide improved 4G and 5G coverage and network capacity to the surrounding area of Hotham Village. The proposed facility will be collocated at the existing telephone exchange and consists of only a very modest small amount of additional infrastructure.

As set out above, the proposed facility demonstrates a high level of consistency with the *Hotham Village - Mt Hotham - Comprehensive Development Plan 1, July 2017* and the Comprehensive Development Zone and schedule more generally.

In particular, the proposed facility is generally in accordance with the desired maximum height at the selected location and minimises its impact on views and surrounds.

The proposed facility is wholly located within the existing allotment, does not require the removal of vegetation, utilises existing access arrangements and creates no additional carparking demand.

The proposal is also consistent with the outcomes sought by the *Victorian Telecommunications Code of Practice* (despite not being exempted under the code).

As such, there are no adverse or unreasonable impacts arising from the installation of the proposed telecommunications facility (which is generally considered to be essential infrastructure in any event) and in particular no material impacts on any views from the surrounding area given the very modest size of the proposed infrastructure.

Accordingly, having had regard for all relevant matters the application warrants a planning permit.

Should the Department require any additional information prior to making its determination, please do not hesitate to contact the undersigned.

Yours sincerely

MARK BAADE

B. Plan (Hons)

M: 0417 088 000

mark@saqconsulting.com.au

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Attached:

Proposal plans

EME report