PUBLIC NOTICE

PROPOSED TELECOMMUNICTION FACILITY

194 SAND PLAIN ROAD, GLENCOE

Ventia Pty Ltd has submitted a Development Application on behalf of Amplitel for the purpose of expanding an existing fibre telecommunications facility.

Prior to determining this application, the Shire would like to provide the general public and neighbouring properties the oppurtunity to comment on the proposal. Information on the application and the development plans can be viewed at the Shire of Woodanilling office during opening hours or on the Shire website at www.woodanilling.wa.gov.au.

Should you wish to make a submission on the proposal, your comments (in writing) will need to be lodged with Council within 21 days by Tuesday 16th September 2025. Submissions can be made to shire@woodanilling.wa.gov.au or alternatively posted to PO Box 99, Woodanilling WA 6316.

Please note, if no comments are received by the closure date, we will assume that you have no comment you wish to make, and the application will be assessed and determined on its merits and without any further consultation.

Should you have any quieres relating to the proposed application, please do not hesitate to contact the Shire on (08) 9823 1506.

Yours Sincerely

Anika Serer
CHIEF EXECUTIVE OFFICER

Shire of Woodanilling

APPLICATION FOR PLANNING APPROVAL

Planning and Development (Local Planning Schemes) Regulations 2015
Application for Development Approval

OWNER DETAILS		
Name: [redacted]		
ABN (if applicable):		
[redacted]		
Work No:	**Home:**	**Mobile:** [redacted]
Email: [redacted]		
Contact person for correspondence: [redacted]		
Signature:	**Date:** 10/07/2025	
Signature:	**Date:**	
The signature of the owner(s) is required on all applications. This application will not proceed without that signature. For the purposes of signing this application an owner includes the persons referred to in the Planning and Development (Local Planning Schemes) Regulations 2015 Schedule 2 clause 62(2).		

APPLICANT DETAILS (IF DIFFERENT FROM OWNER)		
Name: Amplitel Pty Ltd C/- Ventia Pty Ltd		
Address: [redacted]		
Work No:	**Home No:**	**Mobile:** [redacted]
Email: [redacted]		
Contact person for correspondence: [redacted]		
The information and plans provided with this application may be made available by the local government for public viewing in connection with the application.	☒ Yes	☐ No
Signature:	**Date:**	

PROPERTY DETAILS		
Lot No: 3964	**House/Street No:** 194	**Location No:**
Diagram or Plan No: 113659	**Certificate of Title Vol. No:** 1997	**Folio:** 93
Title encumbrances (e.g. easements, restrictive covenants):		
Street name: Sand Plain Road	**Suburb:** Glencoe	
Nearest street intersection: Sand Plain Road and Katanning-Dumbleyung Road		

Email Completed Form

Shire of WOODANILLING
PO BOX 99
WOODANILLING WA 6316
Ph: (08) 9823 1506
shire@woodanilling.wa.gov.au
www.woodanilling.wa.gov.au

PROPOSED DEVELOPMENT	
Nature of development:	☐ **Works** ☐ **Use** ☒ **Works and Use**
Is an exemption from development claimed for part of the development?	
☐ **Yes**	☒ **No** ☐ **Works** ☐ **Use**
Description of proposed works and/or land use: New mobile phone base station within a Regional Rural zoned lot	
Description of exemption claimed (if relevant):	
Nature of any existing buildings and/or land use: Regional Rural zoned lot with fenced telecommunications lease area	
Approximate cost of proposed development: $300,000	
Estimated time of completion: Tentative December 2024	

OFFICE USE ONLY	
Acceptance Officer's initials:	**Date received:**
Local government reference No:	

GENERAL INFORMATION & CHECKLIST

The Shire of Woodanilling Town Planning Scheme No. 1 requires appropriate information to accompany every application for planning approval. This checklist sets out the minimum required information for an application to be considered complete.

All applications should include enough information to enable Shire staff to ensure compliance with TPS1 and Local Planning Policies. Variations to R-Codes will require performance criteria to be addressed.

If the proposal is required to be advertised or notified in accordance with TPS 1, the application will attract an additional fee. You will be advised of this requirement and invoiced in accordance with the Shire's Fees and Charges prior to any advertising taking place.

ALL APPLICATIONS SHALL BE ACCOMPANIED BY:

- Application form fully completed and signed by all landowners where applicable.
- Cover letter providing details of proposed development (as described above).
- Planning Fee - due on lodgement – please contact 08 9823 1506 for advice regarding fees payable)
- Copy of current Certificate of Title.

DETAILED SITE PLAN - (PREFERRED SCALE OF NOT LESS THAN 1:500) INCLUDING:

- Lot boundaries, dimensions & street frontages
- Dimensions of building envelope (where applicable)
- Proposed development (include setback details) and existing structures and/or structures to be removed
- Contours, existing and proposed levels, finished floor levels
- Existing vegetation, proposed landscaping areas and proposed clearing
- Easements, rights of carriageway, sewer/drainage lines, power poles, manholes and footpaths on site or in verge
- On-site effluent disposal system (if applicable)
- Existing/proposed parking, access ways and crossovers
- Fencing / Screen walls (location, height, materials)
- Scale, lot/street number(s), address, owner's name, drawn by, date drawn, north arrow

ELEVATIONS INCLUDING:

- Proposed structures all elevations (additions to include existing structures) showing natural ground level and dimensions.
- External finishes (including schedule of colours and materials)

FLOOR PLANS (2 COPIES) INCLUDING

- Total Floor Area, Proposed Floor Area of Use(s)
- Sanitary facilities, Entry/Exits, Internal Walls

The Shire may within 21 days of receipt of the application request additional information or justification where it is considered necessary to enable an informed assessment of the proposal. Where further information is required you will have 21 days to provide the information requested, or alternatively you can withdraw your application, upon which the minimum fee or 25% of the total application fee, which ever is the greater, will be retained and the remainder refunded. Failure to withdraw the application or to provide additional information within the 21 day timeframe will result in the application being REFUSED.

Any queries regarding your application please contact the Shire of Woodanilling on (08) 9823 1506.

PLEASE NOTE: THIS IS DEVELOPMENT CONSENT ONLY

A separate application for Building Licence may be required. Please enquire at the Shire Office.

Any Application not meeting minimum information requirements will not be accepted.

PLANNING ASSESSMENT REPORT

Planning Permit Application for a Telecommunications Facility

194 Sand Plain Road, Glencoe WA 6316

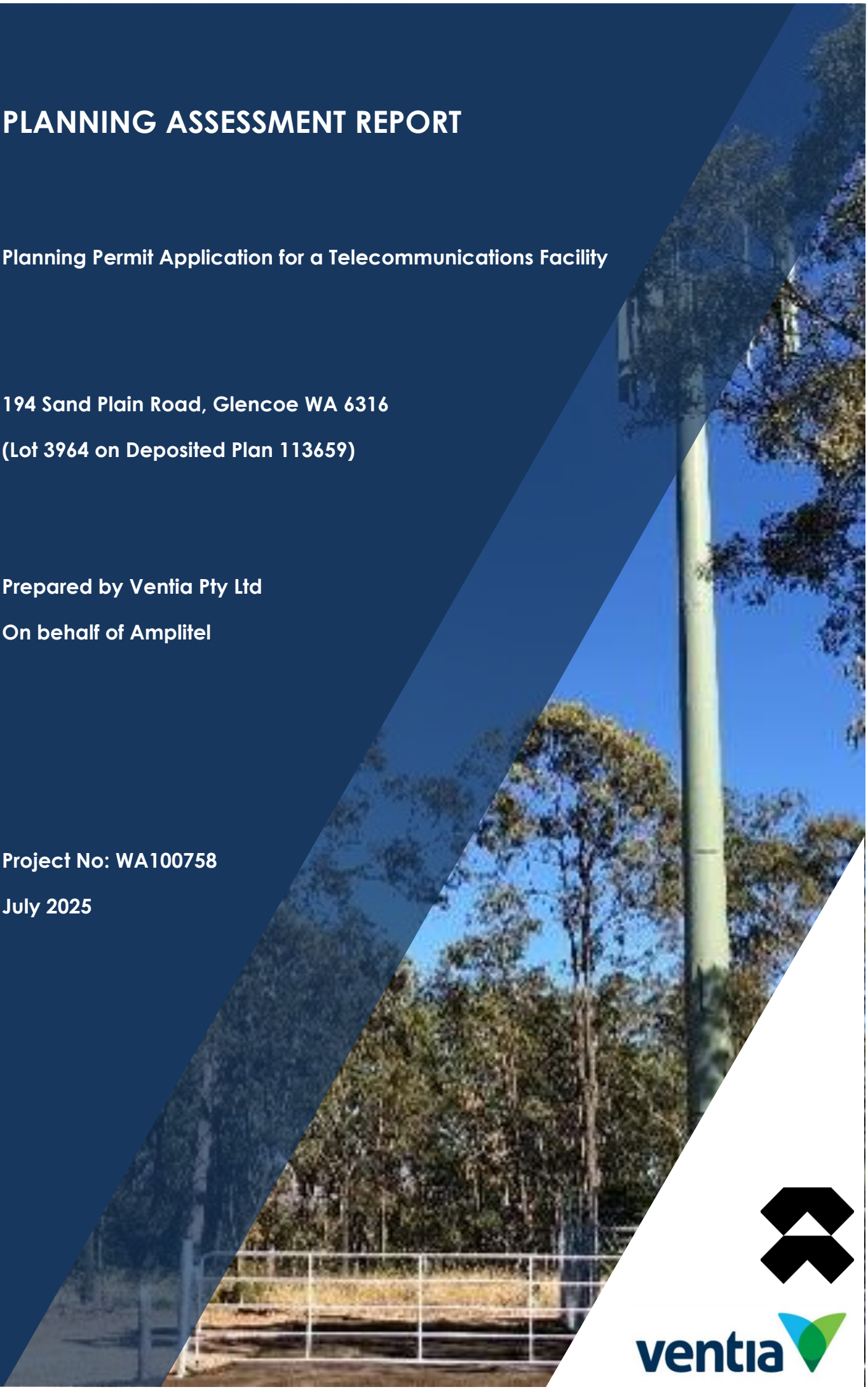
(Lot 3964 on Deposited Plan 113659)

Prepared by Ventia Pty Ltd

On behalf of Amplitel

Project No: WA100758

July 2025



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1.0 EXECUTIVE SUMMARY

1.1 Site and Proposal Details

Address of Site	194 Sand Plain Rd, Glencoe WA 6316.
Legal Property Description	Lot 3964 on Deposited Plan 113659
Coordinates	-33.46764, 117.64319
Site Area	3,188,431.503m²
Registered Owner	[redacted]
Local Authority	Shire of Woodanilling
Proposal	50m high lattice tower, six (6) panel antennas on a triangular headframe, one (1) equipment shelter not more than 3m high with a base area of not more than 7.5m² at the base of the tower and ancillary equipment. Replacement of existing fencing with new compound security fencing and 3m wide double access gates.
Planning Instrument	Shire of Woodanilling Town Planning Scheme No. 1
Zone	Regional Rural
Overlays	Bushfire Fire Prone Area
Application seeking	Development permit for a Telecommunications Facility
Use definition	Telecommunications Infrastructure

1.2 Applicant Details

Applicant	Amplitel C/- Ventia Australia Pty Ltd
Contact Person	[redacted]
Our Reference	WA100758 Congee Exchange

2.0 INTRODUCTION

This report has been prepared by Ventia on behalf of Amplitel as supporting information to a Planning Permit Application for the works and use of a Telecommunications Facility at 194 Sand Plain Road, Glencoe WA 6316. The property is formally described as Lot 3964 on Deposited Plan 113659.

Amplitel, a company part of the Telstra Group is currently undertaking work across Australia to support and expand the new mobile phone infrastructure and coverage for Telstra and other carriers to improve customer experience through faster and more reliable voice and data services.

This project forms part of a wider government funded mobile blackspot program where several areas across Australia, particularly more regional and remote areas have been designated as higher priority areas for improved mobile coverage. Congee Exchange has been identified as being in critical need for the delivery of such services.

Due to an industry-specific network requirement, Amplitel have identified the need to install a telecommunications facility on the site to improve both voice and data services within the surrounding area. Furthermore, the facility will provide 4G and 5G services to the surrounding Glencoe area.

All mobile phone network operators are bound by the operational provisions of the federal *Telecommunications Act 1997 ("The Act")* and the *Telecommunications Code of Practice 2018*. The proposed telecommunications facility installation is not defined as a low-impact facility and is therefore subject to relevant State and local planning provisions.

An extensive site selection process has been completed prior to selecting the subject site as the nominated candidate for a new Telecommunications Facility. This site selection process included considering a variety of factors including planning scheme considerations technical and coverage objectives, cost considerations, land tenure, visual impact and engineering/design criteria. The site was selected as the most appropriate location based on the above considerations, which are outlined in **Section 7** of the report.

The proposal is subject to the provisions of the WA *Planning and Development Act 2005* and the provisions of the *Shire of Woodanilling Town Planning Scheme No. 1*.

3.0 PROPOSED SCOPE OF WORKS

The proposal is inclusive of the following scope of works:

- Installation of one (1) new 50m high lattice tower;
- Installation of one (1) new triangular headframe;
- Installation of Six (6) new panel antennas (no greater than 2.8m in length);
- Installation of one (1) Telstra Equipment Shelter that is not more than 3m high with a base area of not more than 7.5m² at the base of the aforementioned tower;
- Installation of associated ancillary cabling and equipment; And
- Replacement of existing fencing with new compound security fencing and 3m wide double access gates.

Refer to Plans attached in **Appendix A** for further details and **Appendix B** for Land Titles.

All mobile phone network operators are bound by the operational provisions of the Federal Telecommunications Act 1997 (the "Act") and the Telecommunications Code of Practice 1997. The proposed telecommunications facility installation **is not defined as a low-impact facility** and is therefore subject to relevant State and local planning provisions.

Pursuant to the *Planning and Development Act 2005* (**PDA**), the proposal constitutes a change of use and requires a development application to be made to Shire of Woodanilling (**Council**) for approval.

The proposal is subject to the *Shire of Woodanilling Town Planning Scheme No. 1* (the **local planning scheme**). The proposal has addressed the applicable provisions of the planning scheme in **Section 12** of this report.

Under the planning scheme, the proposed scope of works meets the definition for 'telecommunications infrastructure' and the site is within a 'Regional Rural' zone and subject to just a bushfire prone area overlay. As such, the use will not be permitted unless Council has exercised its discretion by granting development approval.

This Planning Assessment Report demonstrates compliance of the proposal against the local planning scheme and the applicable overlay provisions.

Based on the above, the proposed application to install a Telecommunications Facility at 194 Sand Plain Road, Glencoe is considered appropriate for the site and warrants favourable consideration by Council.

4.0 PURPOSE OF THE PROPOSAL

To cater for the growing demand for mobile services, Telstra has embarked on a nationwide rollout to deliver an improved, reliable telecommunications network to the Australian public. The rollout will provide improved mobile coverage and enhanced services in metropolitan, regional and rural areas throughout Australia. This rollout consists of the upgrade of existing telecommunications facilities and where required the installation of new mobile base stations to expand the coverage footprint and offer seamless mobile services.

Additional base stations are required where surrounding facilities cannot provide sufficient coverage to a target area. New facilities are also required when existing base stations are fully utilised and cannot serve additional users in the area. Amplitel and Telstra have undertaken analysis of the Telstra mobile network in Glencoe and have identified areas where coverage and network quality needs to be improved. These include existing commercial and residential areas, as well as the future residential areas to the south. If this investment is not made, the following main issues will arise:

1. Users may have difficulty connecting to the mobile network or the call may drop out. This impacts businesses, residents, visitors to the area and the ability of the user to contact emergency services.
2. Users may experience reduced data speeds, longer download times and poor network performance at busy times of the day with data intensive and time sensitive applications (e.g. newscasts, social media, mobile banking, weather forecasts, sports highlights etc).

As noted above, the lack of telecommunications facilities in Glencoe does not only deprive existing users of signal, but also puts at risk the availability of 21st century services to facilitate residential expansion and growth.

Once a need for improved network performance has been identified, the optimisation of existing facilities throughout the region is explored and undertaken where required. In some cases, this option resolves network deficiencies in an area. However, in this situation the optimisation of surrounding facilities has not been able to achieve a satisfactory outcome for the network in Glencoe. Further investigations into the use of other Carrier and broadcast facilities within the area have also been completed. This is discussed in the Site Selection Process of this report.

5.0 THE NEED FOR THE PROPOSAL

Access to wireless services is a critical requirement in the modern era. While Australia has among the fastest mobile networks speeds across the globe, there is an identified coverage disparity between urban and rural areas. This disparity is due to the population concentration in urban areas, with existing wireless services covering 99% of the population but only 33% of the total landmass. As a result, major transport routes and large landholdings miss out on the critical wireless services available in urban areas.

While satellite services for mobile phone and data are available in some rural areas, the steep cost for landholders, unreliability and low data caps are all significant impediments to their daily use.

The 2018 Regional Telecommunications Review (the **Edwards Review**) brought these issues into clear focus, with important findings relating to:

- economic benefits; and
- social benefits

The Edwards Review found that economic benefits in regional areas are increasingly linked to wireless services, with regional businesses in a weak position to take advantage of new digital applications and economic opportunities. The Australian Government Response to the review strengthened this argument, stating that "*digital agriculture could increase the gross value of Australian agricultural production by $20.3 billion, a 25% increase over 2014-15 levels. The greatest gains are expected to come from remote monitoring, automation, better tailoring of inputs such as fertiliser and seed, and environmental benefits such as efficiencies in water and pest management*".

Tourism is often touted as a key asset to Australia as a whole, with the emerging areas of agri-tourism and eco-tourism combining with the rich and unique history and experiences available in outback areas to provide new economic opportunities for regional areas. Connectivity is a driver of such economic opportunities, even in rural areas. Data from Tourism Australia shows that 289 million visitor nights were spent in regional Australia in 2017, up from 234 million in 2012. The Edwards Report includes first-hand examples from regional tourism operators on the challenges they have faced and how technologies have or could improve their businesses.

The education opportunities in regional areas of Australia have lagged behind those in urban areas for several decades (Karmel. 1973 and Lamb et al. 2014). The need to send children and young adults to cities to obtain the education available in urban areas was long seen as a necessity. The advent of digital education services has proven a boon in ensuring that families in

regional areas can stay together while still receiving a high-quality education. Irrespective of students being educated via distance or at local schools, education is increasingly digital. With video being a key component of lessons, access to wireless services is essential.

Social cohesion and connectivity are another important aspect of the digital age. Expanded wireless services allow for regional and rural communities more options to communicate with each other and with relatives and/or friends in other cities and countries. Additionally, rural and remote communities are less likely to have access to a range of health care services (Rural Health Standing Committee, 2016: National Strategic Framework for Rural and Remote Health). Given the natural hazards such as drought, bushfires and floods that are a frequent and ongoing occurrence in Australia, access to mental health services can be of critical importance. Wireless services allow for more communications opportunities in regional areas and opens additional avenues for mental health services (National Mental Health Commission, 2018).

Wireless services are also important for safety reasons, particularly in relation to the aforementioned natural hazards present in Australia. The 2017-2018 ACMA Communications Report showed that in 2017-2018 there were nine (9) million calls made to emergency services numbers, and increase of 4.8 per cent from 2016-2017, with the majority made from mobile phones. This increase in emergency numbers calls from mobile phones is a continuing trend, with the share increase of approximately 2-3% on average every year from 2012-2014. In regional and remote communities, where potentially dangerous tasks are undertaken on a daily basis, but where neighbours or family members are oftentimes out of earshot, the ability to call for assistance from a mobile phone can be critical.

The proposal is an important aspect of bridging the digital disparity between denser urban areas and regional communities, and in doing so better supporting their communities in a range of areas, including economic, education, social and safety.

6.0 MOBILE TELECOMMUNICATIONS NETWORKS

A mobile telecommunications network is made up of multiple base stations covering a geographic area. They work by sending and receiving radio signals from their antennas to mobile phones and other mobile devices such as tablet computers, wireless dongles etc. Base stations are designed to provide service to the area immediately surrounding the base station which can be up to several kilometers in distance. Depending on the technical objectives of a base station, the physical characteristics of each telecommunications facility; such as its height, number and size of antennas, equipment, cabling etc. will vary.

As a general rule, the higher the antennas of a base station the greater the range of coverage and the ability to relieve capacity issues. If this height is compromised then additional facilities, and thus more infrastructure, will be required for any given locality. The further a facility is located away from its technically optimum position the greater the compromise of the service. This may result in gaps in coverage and require additional or taller base stations to provide adequate service.

Each base station transmits and receives signals to and from mobile devices in the area. As mobile device users move around their devices will communicate with the nearest base station facility to them at all times. If the users cannot pick up a signal, or the nearest base station is congested because it is already handling the maximum number of phone calls or maximum level

of data usage, then the users may not be able to place a call, they may experience call "drop outs" or they might experience a slow data rate while attempting to download content.

There are three main factors that can cause the above:

- You may be too far away from a facility to receive a signal, or there may be objects blocking the signal from the nearest facility; such as hills and large trees. To ensure optimum service the radio signals transmitted between the facility's antennas and mobile devices need to be unimpeded, maintaining a "line-of-sight" between them.
- The facility may be transmitting as much data and calls as it can handle. This can result in call drop-outs and slower data rates when too many users are connected to a facility at once.
- The depth of coverage, which affects the ability to make calls inside buildings, may be insufficient in some local areas.

The current proposal will form part of Telstra's 4G and 5G network solution to the Glencoe locality and will deliver essential mobile services (voice calling, SMS), as well as live video calling, video-based content including; news, finance and sports highlights, and high-speed wireless internet – wireless broadband. With a coverage footprint of more than 2.1 million square kilometers and covering more than 99% of the Australian population. Telstra's 4G and 5G network is Australia's largest and fastest national mobile broadband network and as such requires more network facilities, located closer together to ensure a high-quality signal strength to achieve reliable service and the fastest possible data transfer rates.

7.0 SITE SELECTION PROCESS

Amplitel commences the site selection process with a search of potential sites that meet the network's technical requirements, with a view to also having the least possible impact on the amenity of the surrounding locality. Amplitel applies and evaluates a range of criteria as part of this site selection process.

Telstra and Amplitel assess the technical viability of potential sites through the use of computer modelling tools that produce predictions of the coverage that may be expected from these sites as well as from the experience and knowledge of the radio engineers.

There are also a number of other important criteria that Telstra uses to assess options and select sites that may be suitable for a proposed new facility. These take into account factors other than the technical performance of the site, and include:

- The potential to co-locate on an existing telecommunications facility.
- The potential to locate on an existing building or structure.
- Visual impact and the potential to obtain relevant town planning approvals.
- Proximity to community sensitive locations and areas of environmental heritage.
- The potential to obtain tenure at the site.
- The cost of developing the site and the provision of utilities (power, access to the facility and transmission links).

In making the proposal for this site at Glencoe, Amplitel has carefully weighed all of the aforementioned criteria. This analysis is detailed in the next section.

8.0 CANDIDATE SITES

Amplitel carefully examined a range of possible deployment options in the area before concluding that a new mobile base station at 194 Sand Plain Road, Glencoe would be the most appropriate solution to provide necessary mobile phone coverage to the Glencoe locality.

Accordingly, this section of the report will demonstrate the following:

- Colocation opportunities and existing telecommunications infrastructure within proximity to the proposed installation; and
- An analysis of the locations considered when determining an appropriate location for a new telecommunications installation within the required coverage area.

8.1 Colocation opportunities

The Communications Alliance Ltd. (formerly Australian Communications Industry Forum Ltd. - ACIF) Industry Code C564:2025 – Mobile Phone Base Station Deployment promotes the use of existing sites in order to mitigate the effects of facilities on the landscape. It should also be noted that as a first preference, Amplitel attempts to utilise, where possible, any existing infrastructure or co-location opportunities. Co-location is the beneficial reuse of an existing tall structure to negate a need for a new tower in the area, with antennas and equipment being placed on the existing tall structure and the immediate ground area. Co-locations will commonly include an existing Telecommunications Facility, but can include tall residential buildings, radio towers, or government assets such as water tanks.

Figure 1 shows all existing tall infrastructure and existing and proposed telecommunications facilities surrounding the surrounding area.

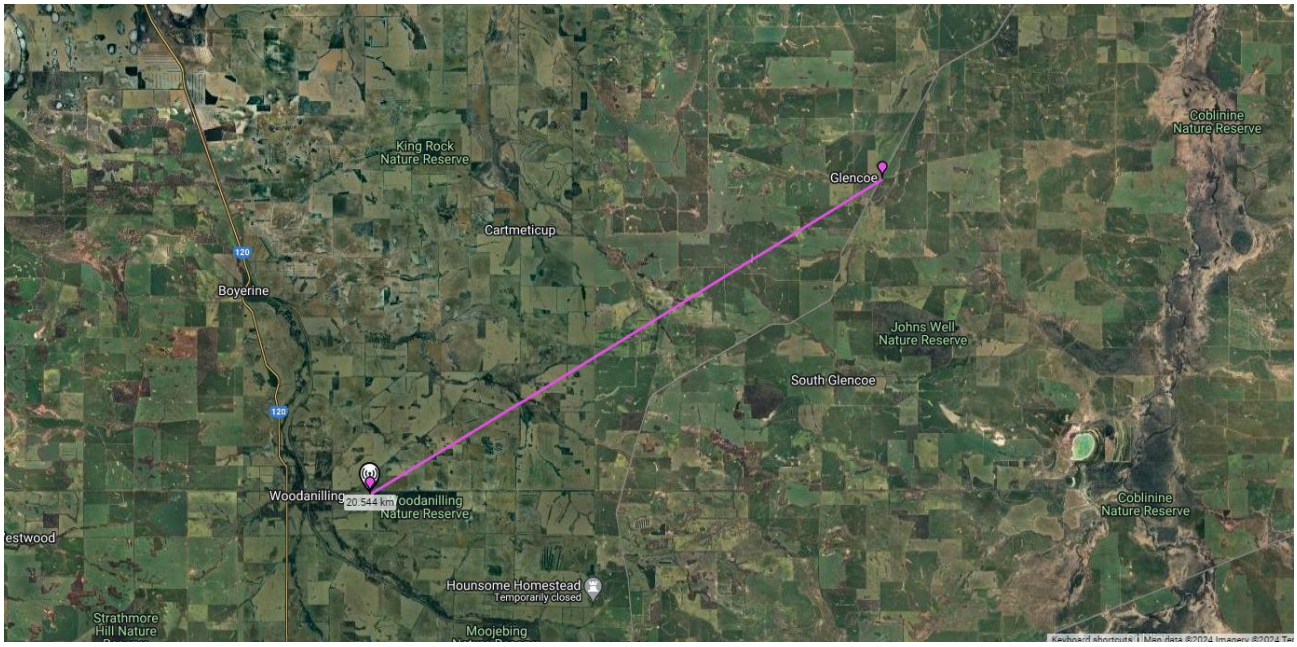

Figure 1: Location of candidates for co-location *Source: www.rfnsa.com.au*

The characteristics of the co-location candidates identified in **Figure 1** are provided below in **Table 1**.

Table 1: Summary of co-location opportunities within the Glencoe area

RFNSA Site No.	Site Address	Structure type	Is site constructed?	Suitable for co-location?	Comments
6316002	Lot 284 Robinson Road East, Woodanilling WA 6316	60.45m Steel Guyed Mast	Yes	No	Tower in Woodanilling is approximately 20km away from the targeted mobile coverage for Glencoe. This existing Woodanilling tower also has existing Telstra antennas on it. It will not be able to provide adequate 4G/5G coverage to Glencoe and surrounds targeted area with an upgrade.

As indicated in **Figure 1**, the closest existing telecommunications facility is located at Lot 284 Robinson Road East, Woodanilling WA 6316 (RFNSA 6316002) which is approximately 20km from the optimal location for the facilities. As this facility is unable to provide coverage to the targeted coverage area it was not considered a feasible co-location option. There are no suitable tall structures in Glencoe also which could feasibly support a rooftop or infrastructure co-location also.

8.2 Candidates considered

The site selected is deemed to be the most optimal location to achieve the required coverage for the targeted coverage area and requires the installation of a new mobile base station. Alternative candidates were considered, with no lots excluded within the 500m search radius from the Telstra exchange. The target coverage area was identified as largely compromising Regional Rural zoned lots mostly adjoining with the cross intersection between Sand Plain Road and Katanning-Dumbleyung Road.

Figure 2 provides a map of the non-colocation candidates considered for the proposed facility. Details on these alternative candidates are further outlined in **Table 2** along with the balance of alternative candidates considered as part of the site selection process.

Figure 2: Location of non-colocation candidates *Source: Google Earth*

Table 2: Summary of non-colocation candidates considered

Candidate	Location	Proposal	Zoning	Reason for exclusion/comments
Candidate A	194 Sand Plain Road, Glencoe WA 6316 Lat: -33.467647° Long: 117.643191°	Greenfield 50m lattice tower	Regional Rural	This is the preferred candidate and the subject of this application. The existing site is a telecommunications exchange with available room and access for the proposal without the need for vegetation clearing.
Candidate B	No Street Address Lat: -33.466916° Long: 117.642934°	Greenfield 50m lattice tower	Regional Rural	This is considered the back-up candidate site. The site is in close proximity to nearest fibre access point and optimal location for Telstra's radiofrequency objectives. Vegetation clearing can likely be avoided, however a new access track would need to be created.

Candidate C	2625 Katanning-Dumbleyung Road, Glencoe WA 6316 Lat: -33.467368° Long: 117.642632°	Greenfield 50m lattice tower	Regional Rural	This candidate site is not preferable as it would require a longer fibre haul of approximately 100m from the nearest fibre access point, along with a new access gate and access track.
Candidate D	No Street Address Lat: -33.476242° Long: 117.637842°	Greenfield 50m lattice tower	Regional Rural	This candidate site is not preferred as it would require a longer fibre haul of approximately 1km from the nearest fibre access point, and the antennas would be approximately 1km away from the optimal location.

8.3 Nominated Candidate

A preferred nominated candidate was selected for the proposed facility based on the radiofrequency objectives, property tenure, planning and environmental issues, potential community sensitive uses and engineering criteria as noted above. For this project, co-location on an existing telecommunications facility is not considered feasible and a new macro tower is considered suitable given:

- the site is technically feasible and can achieve Amplitel's coverage and capacity objectives by installing the new mobile base station;
- the site will provide improved coverage to the Glencoe area;
- the proposed lattice tower will be located inside an existing exchange on land with favourable zoning;
- the facility will be far removed from the nearest community sensitive places such as residences;
- the facility will not alter the land use and will support future carrier co-located facilities;
- the site is not located within a register for heritage or environmental conservation;
- the site is appropriately serviced and has access to the electricity supply network and existing transport network;
- the site will not require pruning of any vegetation;
- the costs associated with delivering the site and constructing the facility are considered by Amplitel to be reasonable.

As stated above, the site selection process carefully considered environmental and visual constraints, existing and future land use characteristics, the orderly planning of the area and the design of the facility. On balance, it is considered that the location and height of the facility ensure optimal service provision to the area whilst minimising any perceived impacts. The proposed Amplitel site has been sited and designed to minimise any adverse impact on the amenity of the surrounding locality. The site is located inside an existing Telstra exchange, far

removed from sensitive sites such as schools, childcare centres, hospitals, residences and locations designated for heritage and environmental protections.

As a result of the aforementioned points, it is considered that the siting and design effectively responds to the landscape setting in the area.

8.4 Site context

The proposed facility is located away from town centres in rural Glencoe, inside the local planning scheme map '01' for Woodanilling-overall-Locality.

The subject property is the large Regional Rural zoned lot at 194 Sand Plain Road, Glencoe. The entrance to the property is taken directly off Katanning-Dumbleyung Road. The 3,188,432m² lot is expansive, relatively flat and vastly cleared with some areas of dense vegetation. There are access tracks throughout, an existing Telstra exchange to the lots north-west corner and likely one residence occupying the centre of the land near the far northern edge.

Adjoining the subject lot are all similarly large sized Regional Rural or Rural zoned lots, cleared of vegetation and flat, with shrubbery lining the lot boundaries adjacent to road corridors. The nearest residence to the proposed structure is the landowners, approximately 1km away East. Other than what is already identified, there are no other community sensitive places of interest or matters of environmental significance in proximity to the development.

Figure 3: Aerial view of a 500m radius from the proposed subject site and surrounds *Source: Google Earth, 2024*

The subject site at the Glencoe (Congee) Telstra exchange is surrounded by large rural land uses. The with specific cardinal borders are provided in Error! Not a valid bookmark self-reference.

Table 3: Summary of adjoining land uses

North	Regional Rural.
East	Regional Rural/Rural.
South	Regional Rural/Rural.
West	Regional Rural.

The surrounding area can be described as rural farmland with a sparse distribution of vegetation and relatively flat terrain.

8.5 Site details

Site Details	
Site address	194 Sand Plain Road, Glencoe WA 6316
Real property description	Lot 3964 on Deposited Plan 113659
Coordinates	-33.46764, 117.64319
Site area	3,188,431.503m²
Registered owner	Philip Michael Crossley & Helle Breitenstein Crossley
Existing land use	Regional Rural
Vegetation	Exchange site is cleared of vegetation
Topography	The proposal area is relatively flat
Services	Site has access to power and existing access.

Figure 4: Subject site for Amplitel proposal - Google Earth Markup – 194 Sand Plain Road, Glencoe *Source: Ventia 2024*

Figure 5: Subject site for Amplitel proposal (looking East towards subject site) – 194 Sand Plain Road, Glencoe *Source: Ventia 2024*

Figure 6 to **Error! Reference source not found.9** shows the subject site to be a secluded area away from the built environment with easy access.

Figure 6 View from the Southern face of the existing compound looking North *Source: Ventia 2024*

Figure 7 View from the Eastern face of the existing compound looking West *Source: Ventia 2024*

Figure 8 View from the Northern face of the proposed compound looking South *Source: Ventia 2024*

9.0 PROPOSAL DETAILS

The proposal is necessary to provide improved 4G and 5G telecommunications services within the Glencoe area. The proposal is part of Telstra's network coverage expansion program but through Amplitel will support additional Carriers to co-locate on the proposed structure.

9.1 Facility and Equipment Overview

The proposed telecommunication installation requires the following works:

- Installation of one (1) new 50m high lattice tower (overall height to top of antennas is (52.17m);
- Installation of one (1) triangular headframe;
- Installation of six (6) new panel antennas (no greater than 2.8m in length);
- Installation of one (1) Telstra Equipment Shelter that is not more than 3m high with a base area of not more than 7.5m² at the base of the aforementioned tower;
- Installation of associated ancillary cabling and equipment; and
- Replacement of existing fencing with new compound security fencing and 3m wide double access gates.

The proposal is demonstrated through the proposal plans, attached in **Appendix A**.

9.2 Access, traffic and parking

The subject site is accessible from Katanning-Dumbleyung Road with room within the unpaved section of the road reserve for temporary setup and parking. (**Figure**).

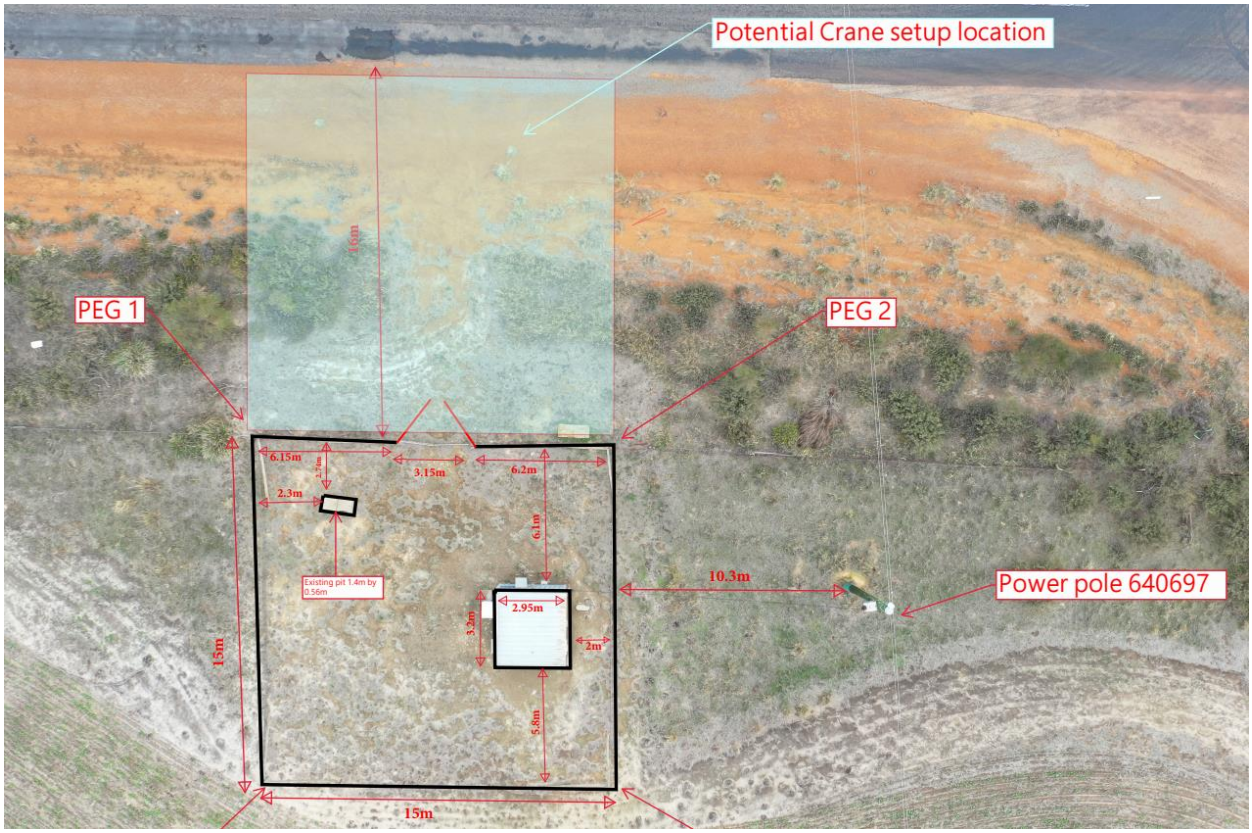

Figure 10 Existing and future access to subject site *Source: Nearmap 2024*

Access to the facility for light and heavy vehicles will be via Katanning-Dumbleyung Road reserve. (**Figure**). The existing access gates of the exchange site will be replaced with 3m wide double access gates.

Figure 11 Existing fencing and gate access to the subject site *Source: Ventia 2024*

To facilitate construction works and enhance existing access for infrequent future maintenance inspections, Amplitel proposes to replace the existing compounds fencing and access gate with new compound security fencing and 3m wide double access gates. See **Figure 11** above for reference.

Mobile phone base stations require only infrequent maintenance visits (i.e. only two (2) to four (4) times per year). Furthermore, the site will operate on a continually unmanned basis. As such, the proposal will not be a significant generator of vehicle and/or pedestrian traffic. Dedicated parking spaces are therefore not considered necessary for the site given the very low traffic generation of the site and the unmanned nature of the site.

During the construction phase various vehicles will be used to deliver equipment and construct the proposed development. Any traffic impacts associated with construction and establishment will be of a short-term duration (i.e. approximately five weeks over non-consecutive periods) and will be temporary in nature and will not affect the existing traffic flows of the surrounding area. In the unlikely event that road closure is required Telstra will apply to the relevant authorities for permission. Traffic management can be applied during construction.

9.3 Utilities

The proposal will involve a new below ground fibre route to connect with the nearest underground fibre network. The site has existing power sourced overhead from a power pole 16m away.

The unmanned nature of the proposed mobile base station removes the need for connections to water or sewer services.

Furthermore, the proposal incorporates very minimal hard surfaces and therefore will generate insignificant stormwater runoff from the site. As such, the proposal does not require connection to the stormwater network.

9.4 Construction schedule

The construction of the mobile base station will take approximately five to six weeks over non-consecutive periods, subject to weather.

The construction of the proposed mobile phone base station primarily consists of the following processes:

- Site preparation and foundation earthworks – Including site clearing and access track preparation;
- Tower foundation installation – Concreting of foundations and installation of underground conduits;
- Tower assembly including head frame and equipment shelter – Crane on site for duration of tower assembly;
- Installation of new equipment using an EWP and laying of cabling – reflective of the scope of works outlined within this Development Application; and

- Network Integration – Ensuring that the mobile phone base station can connect with both end users and other sites within the Telstra network.

No road closures will be required for the erection and installation of equipment, as all construction equipment can be set up on the subject property away from traffic.

9.5 Acoustic

Noise and vibration emissions associated with the proposed facility would be limited to the construction/demolition phase outlined above. The works are to be concluded in a timely manner with construction occurring over a period of 4 weeks, so that residents of the surrounding rural lots should not be inconvenient in the long term.

During normal operation the noise emanating from the air- conditioning equipment would be similar to those used in domestic situations and will comply with the background noise levels given in *Australian Standard AS 1055*.

10.0 RELEVANT FEDERAL LEGISLATION

The following information provides a summary of the Federal legislation relevant to telecommunications deployment.

While Amplitel is not a Carrier itself, it is part of the Telstra Group, and the proposed facility will serve Telstra initially. As a licensed telecommunications carrier, Telstra must operate under the provisions of the *Telecommunications Act 1997* and the following legislation and industry codes:

- The Telecommunications Code of Practice 2021;
- The Telecommunications (Low-impact Facilities) Determination 2018 (as amended);
- Mobile Phone Base Station Deployment Code 2025; and
- The Environment Protection and Biodiversity Conservation (EPBC) Act 1999

10.1 Telecommunications Act 1997

The *Telecommunications Act 1997* (the Act) came into operation on 1 July 1997. The Act provides a system for regulating telecommunications and the activities of carriers and service providers. The aim of the *Telecommunications Act 1997* is to provide a regulatory framework that promotes:

- The long-term interests of end users of carriage services or of services provided by means of carriage services; and
- The efficiency and international competitiveness of the Australian Telecommunications Industry.

Under the *Act*, telecommunications carriers are no longer exempt from State and Territory planning laws except in three limited instances:

1. There are exemptions for the inspection of land, maintenance of facilities, installation of "low impact facilities", subscriber connections and temporary defense facilities. These exemptions are detailed in the Telecommunications (Low-impact Facilities) Determination 2018 and these exemptions are subject to the Telecommunications Code of Practice 2018;

2. A limited case-by-case appeals process exists to cover the installation of facilities in situations of national significance; and
3. There are some specific powers and immunities from the previous Telecommunications Act 1991.

10.2 Telecommunications Code of Practice 2021

The Telecommunications Code of Practice 2021 (The Code) authorizes a carrier to enter land, inspect land and install and maintain a facility. The Code emphasizes "best practice' for the installation of facilities, compliance with industry standards and minimization of adverse impacts, particularly in terms of degradation of the environment and visual impact. The proposal is considered to comply with "best practice" given the proposal will:

- provide improved telecommunications and wireless internet coverage in the Glencoe area;
- be located on a non-residential site within the local area, which maximizes separation to residential and other sensitive uses; and
- Comprises the smallest configuration possible for the site to reduce the visual impact of the proposal, while providing appropriate coverage to the surrounding area.

10.3 Telecommunications (Low-impact Facilities) Determination 2018

The *Telecommunications (Low-impact Facilities) Determination 2018* came into effect in March 2018.

The *Determination* contains a list of Telecommunications Facilities that the Commonwealth will continue to regulate. These are facilities that are essential to maintaining telecommunications networks and are unlikely to cause significant community disruption during their installation or operation. These facilities are therefore considered to be 'Low-impact' and do not require planning approval under State or Territory laws.

The proposed facility at Glencoe does not fall under the *Determination* and, therefore, requires approval under State planning legislation.

10.4 Communications Alliance Ltd. Industry Code C564: 2025 – Mobile Phone Base Station Deployment

The Communications Alliance Limited – *Mobile Phone Base Station Deployment C564:2025* (the Deployment Code) is an industry code of practice registered by the Australian Communications and Media Authority. All licensed telecommunications carriers must abide by the Deployment Code provisions.

The code does not change any regulations at a local, State or Federal level, but supplements these regulations applying to telecommunications carriers, including Telstra. The code sets guidelines for site selection, community consultation, design, installation and operation of telecommunication facilities.

The subject proposal, not being designated a 'Low-impact' Facility', is not subject to the notification or consultation requirements associated with the Deployment Code. These processes are handled within the relevant State and Local consent procedures.

Though the Code does not apply to the proposed development, the intent of the *Code* is to ensure Carriers follow a 'precautionary approach' to the siting of infrastructure away from sensitive land uses and this approach has been followed in the selection of this site, as demonstrated in the *Deployment Code* section 4 – Site Selection, Design and Operation Checklist. The checklist will be uploaded to the RFNSA website, reference number 6044002.

Included in this section's Checklist is a statement of how the public's exposure to EME from the site has been minimised. All emissions from the site will be well within the requirements of the relevant Australian Standard. Details of this standard are contained in the following section.

This site has been selected and designed to comply with the requirements of the *Deployment Code* in so much as the precautionary approach has been adhered to and, as a result, the best design solution has been achieved.

10.5 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection Biodiversity Conservation Act 1999* (the EPBC Act) controls matters of national environmental significance. The key objectives of the EPBC Act include:

a. "To provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance; and
b. To promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources; and
c. To promote the conservation of biodiversity; and
d. To provide for the protection and conservation of heritage…"

Amongst other aspects, the EPBC Act relates to matters of national environmental significance, including world heritage areas, natural heritage places (including declared RAMSAR wetland areas), listed threatened species in communities, listed migratory species, protection of environment on nuclear actions, and environment matters.

The proposal is **not** identified as having a significant impact on any of the above matters of national environmental significance. Therefore, the proposal will not require a referral to the Government Minister for the Environment for assessment.

10.6 Native Title Act 1993

The *Native Title Act 1993* (the **Native Title Act**) was given effect on 1 January 1994 and recognises the rights and interests of Aboriginal and Torres Strait Islander people in land and waters according to their traditional laws and customs. The Native Title Act also sets out processes through which development as a Future Act can proceed with regard to the rights and interests of Traditional Owners.

The subject site is identified on a site that is the subject of a single Native Title claim. (WCD2021/010) A determination was made 1st of December, 2021 that Native Title does not exist over the claim area (**Figure 13**).

Under section 23B of the Native Title Act, native title can be extinguished by previous exclusive possession, where that previous exclusive possession includes a grant or vesting that was granted or created on or before 23 December 1996.

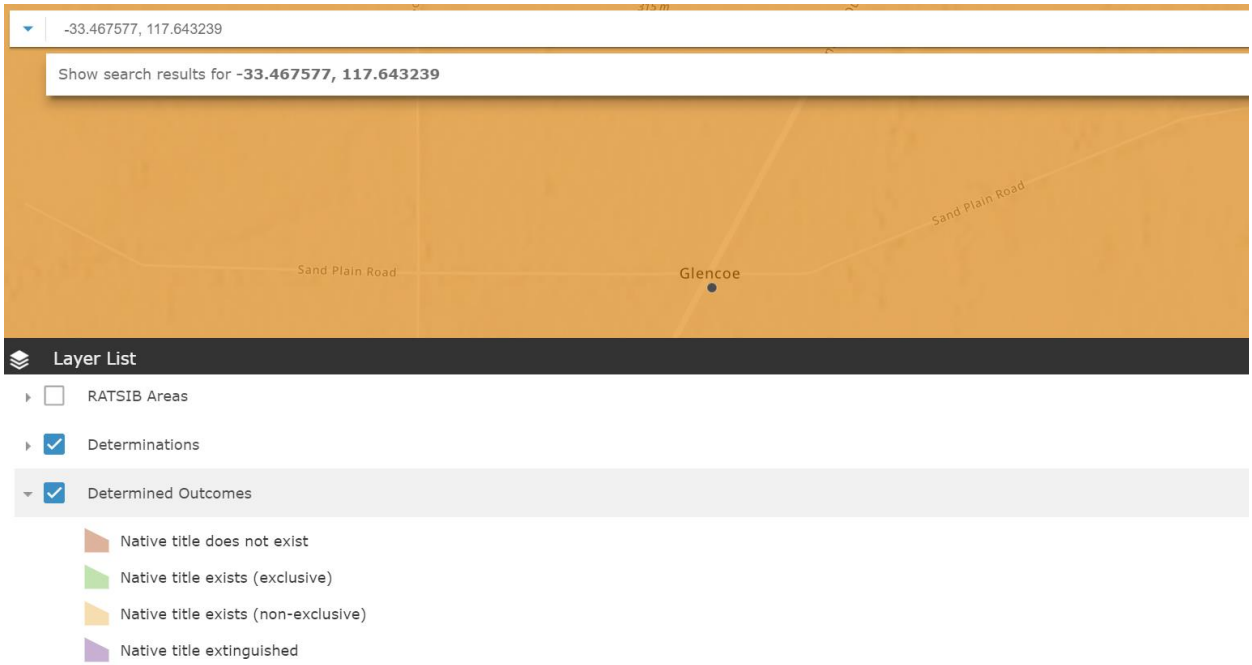

Figure 13: Excerpt of Native Title Tribunal Vision showing relevant Native Title determination in area surrounding subject site *Source: Native Title Tribunal Vision, 2024*

11.0 STATE REGULATORY FRAMEWORK

The following information provides a summary of the State legislation/guidelines relevant to telecommunications development proposals.

11.1 Aboriginal Heritage Act 1972

The *Aboriginal Heritage Act 1972* (the **Aboriginal Heritage Act**) is the main piece of legislation within Western Australia with regards to Aboriginal cultural heritage. The Aboriginal Heritage Act sets out the requirements for ensuring that Aboriginal heritage is appropriately identified and protected.

Under the Aboriginal Heritage Act the Western Australian must maintain an Aboriginal Sites Register where specific places of importance and significance to Aboriginal people are recorded and protected by Law.

Section 5 of the Aboriginal Heritage Act defines an Aboriginal site as:

a) Any place of importance or significance where people of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of Aboriginal people, past or present;

b) Any sacred, ritual or ceremonial site, which is of importance and special significance to people of Aboriginal descent;

c) Any place which, in the opinion of the committee, is or was associated with Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State; and

d) Any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of the Act, such objects have been taken or removed.

As a result of this definition a breach of Section 17 of the Aboriginal Heritage Act occurs when a person excavates, destroys, damages, conceals or in any way alters any Aboriginal site; or who deals with in a manner not sanctioned by relevant custom, or assumes the possession, custody or control of, any object on or under an Aboriginal site, commits an offence unless he is acting with the authorization of the Registrar under Section 16 or the consent of the Minister under Section 18.

Regulation 10 Consent can be granted by authorization by the Registrar or Minister under the AHA, usually granted for non-deleterious, site-preservation land uses (rehabilitation) or in emergencies. Aboriginal sites broadly fall into two categories, archaeological and anthropological or ethnographic sites. Archaeological sites are generally where material evidence of Aboriginal people's traditional cultural life is found. Sites of this type consist of artefact scatters, stone structures, marked trees, fish traps, middens, cave or rock paintings/engravings, arranged stones and burial sites. Most archaeological sites are prehistoric, but some are also more contemporary in nature and are where Aboriginal cultural material objects from the post settlement period are found.

Ventia has conducted an assessment of the area against the Aboriginal Heritage Due Diligence guidelines (the **Guidelines)**, as published originally by the Department of Aboriginal Affairs & Department of the Premier and Cabinet. This assessment considered that the Aboriginal Heritage Inquiry System shows that the public boundary of the nearest Aboriginal Heritages all exceeds a distance of over 1km from the proposed works area. The proposal therefore is immune from approvals under the *Aboriginal Heritage Act 1972*.

Given the site is an existing exchange which has been subject to previous disturbance with the clearing of vegetation for access tracks, fencing and shelter, it is considered less likely that aboriginal relics could be unearthed during the works.

The area where works (including ground disturbance) are proposed (the **works area**) is just inside a 225m^2 (15m x 15m) Amplitel lease area located at 194 Sand Plain Road, Glencoe where the site is not in close proximity to other potential risk factors including freshwater, elevated lookouts, exposed stone or rock and other relevant factors.

This assessment has determined the area is not of high or medium risk for aboriginal heritage, therefore the works may proceed without further approval.

11.2 Planning and Development Act 2005

The Minister of Planning and Infrastructure has ultimate authority for town planning in Western Australia. Development within Western Australia is controlled by the *Planning and Development Act 2005* through the application of environmental planning instruments. Under the *Planning and*

Development Act 2005, the Western Australian Planning Commission (**WAPC**) is the responsible authority for land use planning and development matters and this report seeks to demonstrate compliance with the WAPC and other items of relevant legislation which pertain to the subject application.

11.3 State Planning Policy No. 5.2 – Telecommunications Infrastructure (WAPC)

State Planning Policy 5.2: Telecommunications Infrastructure Policy aims to balance the need for effective telecommunications services and effective roll-out of networks, with the community interest in protecting the visual character of local areas. The SPP applies for the above and below telecommunications infrastructure, other than those exempted under the Commonwealth Telecommunications Act 1997.

Under section 5.1.1 of the State Planning Policy 5.2: Telecommunications Infrastructure Policy the West Australian Planning Commission provides a set of measures in assessing the visual impact of a proposed telecommunications facility.

An assessment of these guidelines below has found that the proposed Telstra Mobile Phone Base Station is compliant with the intent and requirements of the State Planning Policy 5.2: Telecommunication Infrastructure Policy.

Table 5: Assessment against State Planning Policy 5.2, Policy Measure 5.1.1

Measures	Comments	Complies
Be located where it will not be prominently visible from significant viewing locations such as scenic routes, lookouts and recreation sites;	The proposed 50m lattice tower has been sited to maintain the primary use of the land whilst considering the impact to the surrounding locality. A new lattice tower and shelter at the existing exchange would be effectively re-using a site visually associated as being for telecommunications facilities. While the tower would constitute being one of the tallest features in Glencoe following construction, it will not disturb views looking towards any nature reserves and national parks, all of which are several kilometres away.	✓
Be located to avoid detracting from a significant view of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land;	The lattice tower will be sited within an existing telecommunications exchange, a site where such a proposal within a township would generally be regarded as less alien. The exchange site is in a relatively remote area, far away from built-up areas. The lattice tower therefore will not detract from the heritage significance of the 'Congee Telephone Exchange site (Katanning)' (place no. 17208) which is a local heritage item listed in the Shire of Woodanilling municipal inventory. The heritage curtilage comprises all of lot 3964 adjacent to the subject site. The heritage listed telephone exchange in question could not be located since the last survey visit in June 2024.	✓
Not be located on sites where environmental,	The proposed works will not intersect with any area or feature reserved for heritage protection or	✓

cultural heritage, social and visual landscape values may be compromised;	environmental conservation, nor will it threaten any matters of national or state significance. The proposal also will not be visually prominent from the landowners nearest residence. Any visual impact has been mitigated through a variety of design elements along with existing visual buffers present surrounding the location.	
Display design features, including scale, materials, external colours and finishes that are sympathetic to the surrounding landscape;	The proposed 50m lattice tower will remain unpainted (dull grey in colour) blending in with the sky, trees and powerlines from a distance. The proposed equipment shelter will not be more than 3m high or have a base area exceeding 7.5m². The shelter, tower and facilities will sit unremarkably within the exchange, adhering to a typical aesthetic standard for telecommunication sites Australia-wide, corresponding sympathetically with its rural setting.	✓
Be located where it will facilitate continuous network coverage and/or improved telecommunications services to the community;	The proposed location at 194 Sand Plain Road is strategically well positioned within the candidate search area and will provide improved and continuous coverage to the locality, also providing other Carriers with the opportunity to co-locate their infrastructure in the future.	✓
Telecommunications infrastructure should be co-located and whenever possible: Cables and lines should be located within an existing underground conduit or duct; and Overhead lines and towers should be co-located with existing infrastructure and/or within an existing infrastructure corridor and/or mounted on existing or proposed buildings.	As per Section 7 of this report, no suitable opportunities for co-location were identified in the area and it has been identified that the proposed Amplitel site location is seen as the preferred site location. Colocation was investigated; however, the locations are too far from the subject area to meet the coverage objectives of the project or lack the structural capacity to support a new headframe, panel antennas and other facilities. Therefore, it has been identified that the area of land at the 194 Sand Plain Road reserve is seen as the preferred site location. As mentioned previously, the proposed Amplitel lattice tower will also provide other Carriers with the opportunity to co-locate their infrastructure in the future. Overhead lines are not applicable to this application.	✓

Overall, the proposed development application is consistent with the intent and requirements of the SPP 5.2.

11.4 Statement of Planning Policy No. 5.2 – Telecommunications Infrastructures (WAPC)

With the gazettal of State Planning Policy 5.2, the WAPC *Statement of Planning Policy No. 5.2 – Telecommunications Infrastructure* (Statement 5.2) has been repealed. However, it is recognised

that Statement 5.2 provides a more holistic set of criteria than SPP 5.2 which largely focuses on visual impacts. Given this, an assessment of the guiding principles of Statement 5.2 is provided in **Table 6**.

Table 6 Assessment against Statement 5.2 Guiding Principles

Principles	Comments	Complies
There should be a co-ordinated approach to the planning and development of telecommunications infrastructure, although changes in the location and demand for services require a flexible approach.	Telstra undertakes a carefully co-ordinated and planned approach to the development of their network.	✓
Telecommunications infrastructure should be strategically planned and co-ordinated, similar to planning for other essential infrastructure such as networks and energy supply.	The proposed facility is strategically planned and co-ordinated to ensure that the facility will provide high level coverage to the Glencoe area. The proposed facility will allow for future co-location by other telecommunication providers, ensuring no other similar scale facilities are required in the future to provide essential telecommunication services.	✓
Telecommunications facilities should be located and designed to meet the communication needs of the community.	The proposed facility is strategically planned and co-ordinated to ensure that the facility will provide high level coverage to the Glencoe area.	✓
Telecommunications facilities should be designed and sited to minimise any potential adverse visual impact on the character and amenity of the local environment, in particular, impacts on prominent landscape features, general views in the locality and individual significant views.	The proposed 50m lattice tower has been sited to maintain the primary use of the land whilst considering the impact to the surrounding locality. A new lattice tower and shelter at the existing exchange would be effectively re-using a site visually associated as being for telecommunications facilities. While the tower would become one of the tallest features in Glencoe following construction, it will not disturb views looking towards any nature reserves and national parks, all of which are several kilometres away.	✓
Telecommunications facilities should be designed and sited to minimise impacts on areas of natural conservation value and places of heritage significance or where declared rare flora are located.	The proposed telecommunications facility will not be located within a heritage item, conservation area or threaten any regulated vegetation within an environmentally sensitive area. No pruning of vegetation is required and the proposed works will incorporate visually sympathetic design elements and will not threaten the 'Congee Telephone Exchange	✓

	site (Katanning)' (place no. 17208) which is a local heritage item listed in the Shire of Woodanilling municipal inventory. The heritage curtilage comprises all of lot 3964 adjacent to the subject site. The heritage listed telephone exchange building on site will not be impacted.	
Telecommunications facilities should be designed and sited with specific consideration of water catchment protection requirements and the need to minimise land degradation.	Prior to the commencement of work Telstra will undertake such measures as deemed necessary by Council to effectively protect water catchments within the immediate area.	✓
Telecommunications facilities should be designed and sited to minimise adverse impacts on the visual character and amenity of residential area.	The lattice tower will be sited within the existing exchange, positioned no closer than a kilometre from the nearest physical residential house. There are no residential streetscapes in proximity to the proposal which warrant consideration.	✓
Telecommunications cables should be placed underground, unless it is impractical to do so and there would be no significant effect on visual amenity or, in the case of regional areas, it can be demonstrated that there are long-term benefits to the community that outweigh the visual impact.	Overhead cabling is not proposed for this site.	N/A
Telecommunications cables that are installed overhead with other infrastructure such as electricity cables should be removed and placed underground when it can be demonstrated and agreed by the carrier that it is technically feasible and practical to do so.	This principle does not apply to the subject of this application.	N/A
Unless it is impractical to do so telecommunications towers should be located within commercial, business, industrial and rural areas and areas outside identified conservation areas.	The proposed site is within a rural area zoned 'Regional Rural' in the *Shire of Woodanilling Town Planning Scheme No. 1*.	✓
The design and siting of telecommunications towers	As per Section 7 of this report, no suitable opportunities for co-location were identified	✓

and ancillary facilities should be integrated with existing buildings and structures, unless it is impractical to do so, in which case they should be sited and designed so as to minimise any adverse impact on the amenity of the surrounding area.	in the area and it has been identified that the proposed Amplitel site location is seen as the preferred site location. Co-location was investigated; however, the existing structures explored were either too far from the subject area to meet the coverage objectives or lacked both the structural integrity and capacity to host the new Telstra facilities proposed, let alone other future carrier co-located facilities.	
Co-location of telecommunications facilities should generally be sought, unless such an arrangement would detract from local amenities or where operation of the facilities would be significantly compromised as a result.	As per Section 7 of this report, no suitable opportunities for co-location were identified in the area and it has been identified that the proposed Amplitel site location is seen as the preferred site location. Colocation was investigated; however, the existing structures explored were either too far from the subject area to meet the coverage objectives or lacked both the structural integrity and capacity to host the new Telstra facilities proposed, let alone other future carrier co-located facilities.	✓
Measures such as surface mounting, concealment, colour co-ordination, camouflage and landscaping to screen at least the base of towers and ancillary structures, and to draw attention away from the tower, should be used, where appropriate, to minimise the visual impact of telecommunications facilities.	The proposed 50m lattice tower will remain unpainted (dull grey in colour) blending in with the sky, trees and powerlines from a distance as it will have a slimmer body than the typical lattice tower. The proposed equipment shelter also will not be more than 3m high or have a base area exceeding 7.5m². The structure, shelter and facilities will sit unremarkably within the exchange, corresponding sympathetically with the surrounding landscape.	✓
Design and operation of a telecommunications facility should accord with the licensing requirements of the Australian Communications Authority, with physical isolation and control of public access to emission hazard zones and use of minimum power levels consistent with quality services.	Telecommunications facilities include radio transmitters that radiate electromagnetic energy (EME) into the surrounding area. The levels of these electromagnetic fields must comply with safety limits imposed by the Australian Communications and Media Authority (ACMA, previously ACA). All Telstra installations are designed to operate within these limits.	✓
Construction of a telecommunications facility (including access to a facility) should be undertaken so as to minimise adverse effects on the natural environment and	During construction Telstra contractors will endeavour to minimise the impact of their works on the amenity of the nearest residents and on the surrounding environment. As the proposed site adjoins an access track separating a neighbouring lot and is located	✓

the amenity of users or occupiers of adjacent property and to ensure compliance with relevant health and safety standards.	in a section of the rural lot surrounded by dense tall clusters of tall trees, adverse effects on the nearest properties will be minimal. Following construction, maintenance (excluding emergency repair work) activities should not interfere with the amenity of users. All Health and Safety standards will be adhered to.	

Overall, the proposed development application is consistent with the intent and requirements of the Statement 5.2

12.0 LOCAL REGULATORY FRAMEWORK

The following information provides a summary of the local provisions relevant to the telecommunications development proposal.

12.1 Shire of Woodanilling Town Planning Scheme No. 1

The *Shire of Woodanilling Town Planning Scheme No. 1* provides the basis for planning in the Shire of Woodanilling local government area.

The proposed site is within the Regional Rural Zone (**Figure 14**) further outlined in **section 12** of this report.

Within the Shire of Woodanilling's Local Planning Scheme text, Telecommunications Infrastructure' is listed and defined as including a tower and several other facilities relevant to this proposal. This use and development class is assigned a 'D' if within a Regional Rural Zone per the schemes table 1 zoning table. Under section 4.3 of Part 4 of the local planning scheme, category 'D' details that such an activity within this designated land use 'is not permitted unless the local government has exercised its discretion by granting development approval'. An assessment of the proposal against section 4.2, part 4 of the local planning schemes 'Regional Rural Zone' objectives suggests the proposal shall comply with the general requirements and that the nature of the development should be deemed appropriate relative to the zoning controls.

While the Shire of Woodanilling does not have a local planning strategy in place, Ventia believes the proposed works should align with the council's vision for Glencoe. The structure and facilities will enhance community safety and rural livelihoods with greater mobile connectivity and improved emergency service response times. Once in operation, Telstra's facilities would also facilitate the potential for rural businesses and industries to diversify and thrive.

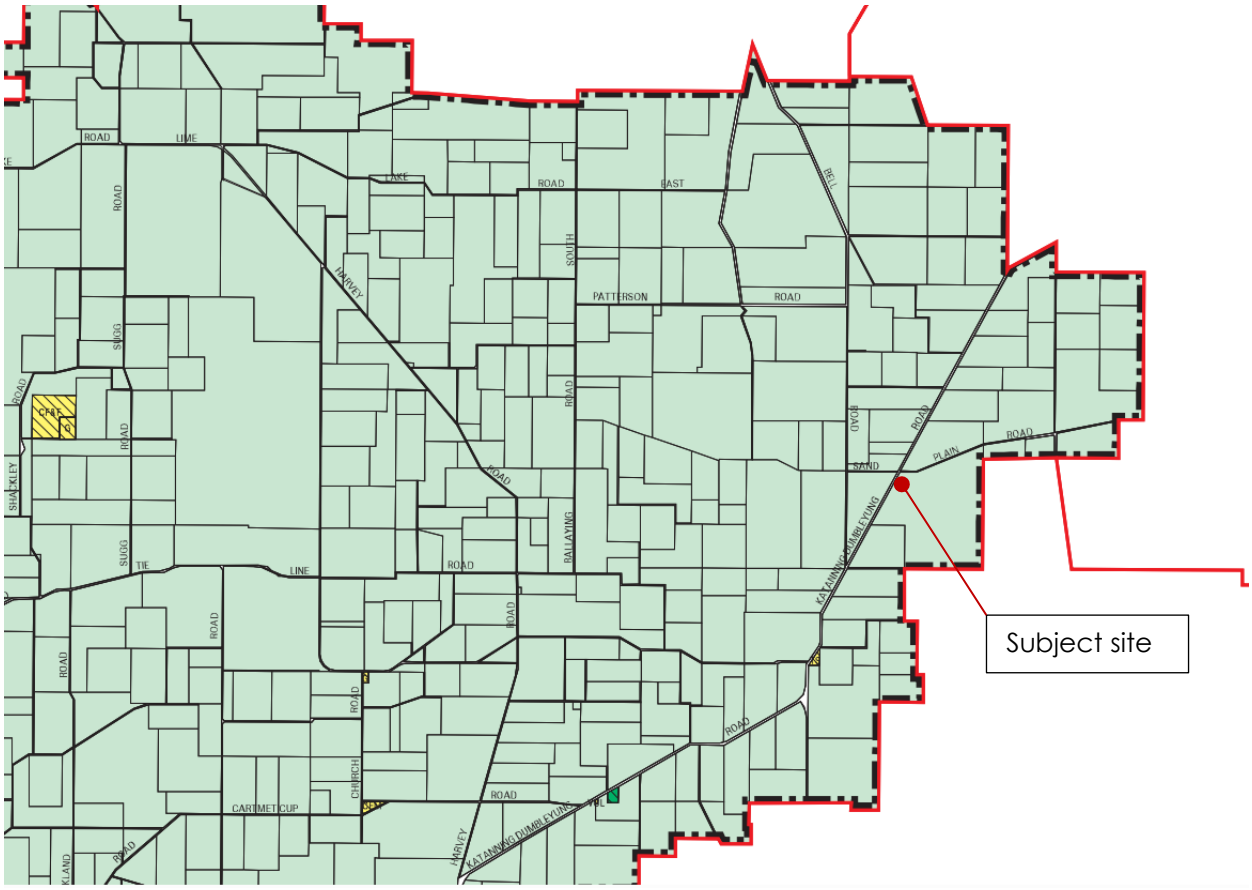

Figure 14: Zoning Map No. 1 Woodanilling-overall *Source: Shire of Woodanilling Town Planning Scheme No. 1*

12.2 Regional Rural Zone Objectives

Development within the Regional Rural Zone is required to demonstrate compliance with the objectives and site requirements of the zone within the local planning scheme.

As such, this proposal can be assessed against the Regional Rural Zone objectives set out in section 4.2 of Part 4 Zones and The Use of Land of the *Shire of Woodanilling Town Planning Scheme No. 1* in **Table 6** below.

Objectives	Comments	Complies
To ensure the continuation of broad-acre farming as the principal land use in the district and encourage where appropriate the retention and expansion of agricultural activities;	The proposed telecommunications structure and facilities will be confined to a fenced lease area already dedicated to telecommunications uses. As such, the proposal will not interfere with present and future agricultural uses of the subject lot.	✓
To protect the potential of agricultural land for primary production and to preserve the landscape and character of the rural areas;	The proposed mobile base station will operate and stand sympathetically within the rural area. It will not be a generator of stormwater runoff, emissions, noise pollution or traffic and will not require any significant ground disturbance or clearing of	✓

	vegetation within the private lot, with majority of the disturbance confined to the telecommunications lease area.	
To consider other non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment;	Improved reception in the immediate vicinity and Glencoe area for SMS/calls and mobile data download speeds will enhance both the local rural character and the livelihood of locals via this proposal for new telecommunications infrastructure.	✓
To provide for a range of rural pursuits such as broad-acre and diversified farming which are compatible with the capability of the land and retain the rural amenity and character of the locality;	This proposal is not for a rural land use, however it will not compromise the landowners of the subject lot and adjoining lots to pursuit broad-acre and diversified farming uses.	✓
To provide for a range of commercial and light industrial land uses that are appropriately located and will not cause land conflicts or adverse impacts on the amenity and character of the zone;	The proposal will not prevent the subject lot and adjacent lots from hosting commercial and light industrial developments compliant within Rural Regional zoning regulations in the local planning scheme.	✓
To prevent the fragmentation of broad-acre farming properties through the process of subdivision;	N/A. This application does not call for the subdivision of lot 3964 and the lease area for the telecommunications structure and facilities will not be extended past the existing fenced compound.	✓
To protect broad-acre agricultural land from land degradation and any further loss of biodiversity by: (i) minimising the clearing of remnant vegetation on public and private lands; (ii) encouraging the retention and protection of existing remnant vegetation; (iii) encouraging the development and protection of corridors of native vegetation; (iv) encouraging the development of environmentally acceptable	As there will be no clearing of shrubbery, with much of the small footprint of ground disturbance contained within the existing fenced telecommunications lease area and road reserve, no loss of biodiversity or degradation of undisturbed land is anticipated. Appropriate sediment control and waste management practices will be applied during construction to ensure sound environmental conditions are maintained in the area.	✓

surface and subsurface drainage; (v) encouraging the rehabilitation of salt affected land; (vi) controlling the introduction and spread of alien species of flora and fauna; (vii) encouraging soil conservation through the application of cultural vegetational land management measures.		

Overall, the proposed development application is consistent with the intent and requirements of the *Western Australian Planning Commission SPP 5.2* and the *Shire of Woodanilling Town Planning Scheme No. 1*.

13.0 GENERAL PROVISIONS

This proposal is for a new Telstra Mobile Base Station Facility in the Glencoe area.

Amplitel considers that the proposal is appropriate for the locality, given its compatibility with surrounding rural land uses and far separation from built-up areas.

Environmental considerations such as visual impact, heritage, flora and fauna, traffic, bushfire risk, social and economic aspects, health and safety have been discussed throughout the report and/or within the sub sections below.

13.1 Visual Impacts

The visual impact of the proposal towards the surrounding vicinity is considered to be very minimal.

The site location has the benefit of being within a rural setting, surrounded by an abundance of natural features, with very few residents within 500m of the site, with the nearest built rural residence approximately 1km away and belonging to that of the landowner.

The works will not visually impact any heritage place, conservation park, or wilderness area, or unacceptably disturb any view towards a residence or any other appreciable view. The proposal has therefore been appropriately sited in order to avoid compromising as best as practical the areas visual amenity and the landowner's ability to use and enjoy their property.

Design measures have been applied to further mitigate visual impact, with the proposed structure's appearance being a non-reflective, light and neutral colour, with the headframe and antennas protruding as minimally as possible to reduce visual bulk when viewed from a distance.

On the whole, Telstra believes the benefits the proposal will bring to local residents, businesses and those transiting through will far outweigh any minor visual impact on the surrounding landscape.

13.2 Heritage

A search of the relevant heritage registers does not identify any heritage items overlying with the subject site location or at threat from the proposed works. Please see Section **11.3** and **11.4** of this report for more details.

There are no Commonwealth, World, or National Heritage Places identified in the site location according to the Commonwealth Department of the Environment and Energy mapping.

13.3 Flora and Fauna

In order to determine any possible natural Flora and Fauna significance associated with the site, a search was conducted during a site survey together with a search through the relevant environmental registers.

The Protected Matters Search Tool from the Department of the Environment and Energy shows matters of national environmental significance or other matters protected by the Environment Protection and Biodiversity Conservation Act 1999. A search using this tool found that no significant environmental matter was identified on the subject site. Further details regarding the report findings can be found in **Appendix C**, which identifies 11 threatened species and 6 migratory species which may occur within the area.

A search using the Department of Water and Environmental Regulation's 'clearing permit system map' also shows that the site is not an environmentally sensitive area or an environmental conservation area, with no threatened or priority ecological communities within the project area.

As there will be no destruction to fauna habitat or clearing of any native vegetation, no disturbance to listed communities of flora and fauna is anticipated.

13.4 Bushfire

The specific site location is identified as being within a Bush Fire Prone Area by the Fire and Emergency Services Commissioner (**Figure 19**).

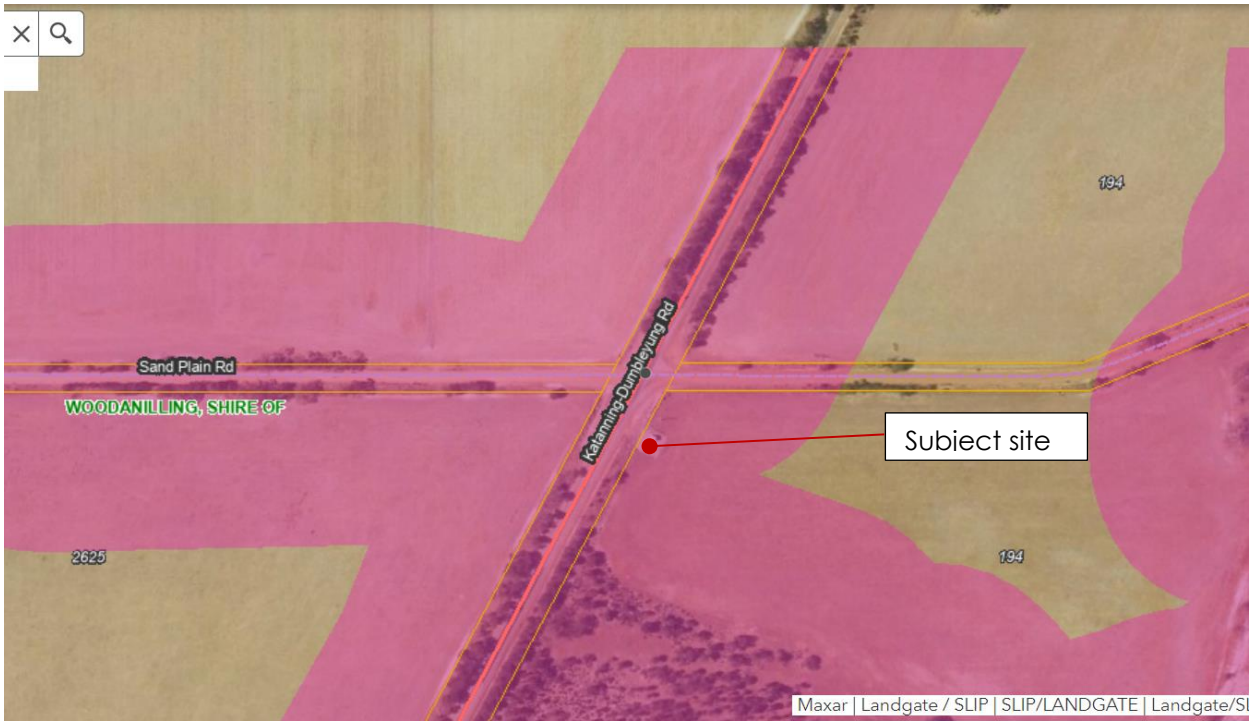

Figure 19: Bushfire Prone Areas Mapping *Source: SLIP Map of Bushfire Prone Areas*

Natural disasters, including the continuing threat of bushfires, have served to highlight the critical importance of effective telecommunications. Previous bushfire incident reviews have demonstrated effective telecommunications networks are essential for disaster response management, allowing emergency services providers to be alerted to medical or fire emergencies.

In its Communications Report 2014-2015 the Australian Communications and Media Authority reported that in 2014 -15, 66.9% of calls to the 000 emergency number were made from mobile phones. Therefore, in addition to day-to-day personal and business applications, effective telecommunications networks can be the difference between life and death in disaster situations.

The entirety of the facility will be earthed in accordance with the Australian Standard. Earthing draws any lightning strike underground away from combustible material. It is submitted that contrary to being a risk factor for fires, the site in this case could reduce the risk of lightning strike causing fires, by attracting the strike and earthing it underground.

The State Planning Policy 3.7 provides the foundation for land use planning to address bushfire risk management in Western Australia. Notwithstanding the Department of Planning updated *Planning Bulletin 111/2016* to clarify that for telecommunications infrastructure, SPP 3.7 should be applied pragmatically.

The Planning Bulletin states:

"*Exemptions from the requirements of SPP 3.7 and the deemed provisions should be applied pragmatically by the decision maker. If the proposal does not result in the intensification of development (or land use), does not result in an increase of residents or employees; or does not involve the occupation of employees on site for any considerable amount of time, then there may not be any practicable reason to require a BAL Assessment. Exemptions may apply to infrastructure including roads, telecommunications and dams; and to rural activities, including piggeries and chicken farms which do not involve employees on site for a considerable amount of time.*"

With respect to the above, Amplitel believe that all necessary design measures have been undertaken to ensure the facility does not increase or affect the bushfire risk to the area. The subject site is on a flat terrain and the proposed equipment shelter will be made from prefabricated and non-combustible materials, with siting measures that ensure the lattice tower achieves >10m of separation from the closest tree to the fenced compound. Additionally, the proposed facility will operate on an unmanned basis requiring only 2-4 maintenance visits per year. Therefore, the proposed work does not increase the extent of bushfire risk currently affecting the land.

13.5 Health and Safety

Telstra acknowledges 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.

Telstra, along with the other 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).

In 2003 the ACMA adopted a technical standard for continuous exposure of the general public to RF EME from mobile base stations. The standard, known as the *Radiocommunications (Electromagnetic Radiation – Human Exposure) Standard 2003*, was prepared by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and is the same as that recommended by ICNIRP (International Commission for Non- Ionising Radiation Protection), an agency associated with the World Health Organisation (WHO). Mobile carriers must comply with the Australian Standard on exposure to EME set by the ACMA.

The Standard operates by placing a limit on the strength of the signal (or RF EME) that any Carrier 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 is 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, Telstra is required to complete and make available an EME report which predicts the maximum environmental EME level the facility will emit. Telstra has completed this EME report, and it shows that the maximum level of EME emitted by the proposed facility is 0.30% (**Appendix D**).

Amplitel and Telstra rely on the expert advice of national and international health authorities such as ARPANSA and the 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.

Telstra has 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 Telstra's responsible approach to EME and mobile phone technology.

13.6 Social and Economic Impact

Reliable mobile phone coverage is important to ensure the economic growth of communities. It is not expected to have any adverse social or economic impacts as a result of the development. Indeed, it is anticipated that there would be positive impacts because of mobile telephone coverage, and the proposed facility could also be utilised in the event of an emergency with reference to mobile phone and internet use.

The proposed development is essential to enable Carriers to remain competitive and increase the choice of mobile telephone services for consumers. Additional competition in the market will have economic benefits for individual consumers and the community as a whole. The development is consistent, with the objectives of the *Telecommunications Act 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).

14.0 CONCLUSION

This application is a direct result of the community's request for reliable telecommunications to be provided to the Glencoe area. There is strong State policy support for telecommunications facilities if, when balancing improved telecommunications services with environmental impacts; including for example, visual impact and flood or fire hazard, a particular proposal provides a net community benefit.

The proposed works provide the community with reliable 4G and 5G access which in turn supports the various residential customers and tourists along with rural uses in the area. This also forms part of a wider plan to ensure reliable and accessible coverage during emergency situations such as in the event of bush fires or any other natural disaster.

Ventia, on behalf of Telstra and Amplitel has undertaken an assessment of the relevant matters as required by the *Telecommunications Act 1997*, State Legislation and the *Shire of Woodanilling*

Town Planning Scheme No. 1. The proposal is considered appropriate in light of the relevant legislative, environmental, technical, radio coverage and public safety requirements.

The proposed development is considered appropriate for the subject site for the following reasons:

- The proposed works will provide reliable mobile phone service to Glencoe. The improved coverage is increasing access to new technologies for key regional sectors and communities, which rely on a fast, reliable and affordable mobile network.
- The proposal will not significantly encroach on views looking on towards the proposal from the nearest residences.
- The proposal will not detract from the heritage significance of the local heritage item 'Congee Telephone Exchange site (Katanning)' listed in the Shire of Woodanilling municipal inventory (Place no. 17208). Category 4 listing.
- The proposal is in no proximity to community sensitive points of interest such as residences, schools, childcare centres and healthcare premises.
- The proposal will mitigate visual impacts through various design measures employed, relating to the material and colours used, along with the size and positioning of facilities without compromising the proposal's structure and coverage objectives.
- The proposal is consistent with the relevant provisions of the *Shire of Woodanilling Town Planning Scheme No. 1* or presents only minor conflicts with them.
- The proposal will improve Telstra 4G and 5G communications services to the area, including voice calls, video calling and Wireless Broadband, and allow or other Carriers to provide similar services.
- The proposal will not require any clearing of vegetation from the subject property.
- The proposal will not affect the existing site or adjacent sites landuses or their potential to be developed or redeveloped.
- Emissions from the proposed facility will be significantly below the Australian Radiation Protection and Nuclear Safety Agency standards adopted by the Australian Communications and Media Authority.

The assessment of the proposal demonstrates that the proposal represents sound and proper town planning and it is respectively requested that consent is granted for this development application.

Should the Council have any further queries regarding the application, please do not hesitate to contact the nominated representative outlined within this document.

APPENDIX A – PLANS OF THE PROPOSAL

APPENDIX B – CERTIFICATES OF TITLE

APPENDIX C – ENVIRONMENTAL ANALYSIS REPORT

APPENDIX D – EME REPORT

WESTERN AUSTRALIA

TITLE NUMBER	
Volume	Folio
1997	**93**

RECORD OF CERTIFICATE OF TITLE

UNDER THE TRANSFER OF LAND ACT 1893

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BGRoberts

REGISTRAR OF TITLES

REGISTRAR OF TITLES WESTERN AUSTRALIA

LAND DESCRIPTION:

LOT 3964 ON DEPOSITED PLAN 113659

REGISTERED PROPRIETOR:
(FIRST SCHEDULE)

[redacted]

BOTH OF 3108 KATANNING-DUMBLEYUNG ROAD GLENCOE WA 6316
AS JOINT TENANTS

(T O829186) REGISTERED 6/8/2021

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS:
(SECOND SCHEDULE)

1. J738714 LEASE TO TELSTRA CORPORATION LTD OF TELSTRA CENTRE, 80 STIRLING STREET, PERTH EXPIRES: SEE LEASE. AS TO PORTION ONLY REGISTERED 11/5/2006.
2. O829187 MORTGAGE TO AUSTRALIA & NEW ZEALAND BANKING GROUP LTD REGISTERED 6/8/2021.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required. Lot as described in the land description may be a lot or location.

----------END OF CERTIFICATE OF TITLE----------

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND:	1997-93 (3964/DP113659)
PREVIOUS TITLE:	1091-152
PROPERTY STREET ADDRESS:	194 SAND PLAIN RD, GLENCOE.
LOCAL GOVERNMENT AUTHORITY:	SHIRE OF WOODANILLING