

Lot 4 (1) Congdon Street Cottesloe – Response analysis

Table 1: Issues by Submission

Submission	Issues
G. Lazdins	Visual amenity of faux chimneys – Preference for bare structure or plain shrouds Health concerns (EME emissions) Alternative location Proliferation of future facilities
Cameron Cooper - GJJ Group	Visual amenity Property values Consultation process concerns- Proposal should be determined by full Council
Susan Fleming and Peter Kohlen	Consultation process concerns – advertising catchment - timeframe. Health concerns (EME emissions) Health concerns (Asbestos) Property values Structural integrity Visual amenity Location of facilities in residential areas Alternative location
Tony and May Smith	Visual amenity Reduction of height Alternative location
Adrian and Kate Moore	Structural integrity Visual amenity Property values Health concerns (EME emissions) Alternative location Avoidance of rental liability Exceeding height restrictions Reason for re-location Requirement for facilities Suitability and practicality of site Consultation process concerns – advertising catchment Decision is a fait accompli
Anthony Cribb and Liesl Quince	Height concerns and precedents in residential areas Proliferation of future facilities Visual amenity Alternative location Avoidance of rental liability Location of facilities in residential areas Compliance with Industry Code Requirement for two masts Suitability and practicality of site Health Concerns (EME emissions) Health Concerns (Asbestos) Structural integrity Consultation process concern- Proposal should be determined by full Council

Danielle Newman	Visual amenity Health concerns (EME emissions) Health concerns (Asbestos) Alternative sites Location of facilities in residential areas
Lorraine Young	Visual amenity Exceeding height restrictions Health Concerns (EME emissions) Consultation process concerns- Proposal should be determined by full Council Location of facilities in residential areas

Table 2: Submissions by Issue

Issue	Submissions
Health concerns (EME emissions)	6 Lazdins Kohlen-Fleming Moore Cribb-Quince Young Newman
Health concerns (asbestos)	3 Kohlen-Fleming Cribb-Quince Newman
Visual Amenity	8 Lazdins Cameron Cooper Kohlen-Fleming Smith Moore Cribb-Quince Young Newman
Requirement for facilities/ Reason for re-location	1 Moore
Alternative sites	6 Lazdins Kohlen-Fleming Smith Moore Cribb-Quince Newman
Property Values	3 Cameron Cooper Kohlen-Fleming Moore
Consultation Process	5 Cameron Cooper Kohlen-Fleming Moore Cribb-Quince Young

Proliferation of future facilities	Lazdins Cribb-Quince	2
Structural integrity	Kohlen-Fleming Moore Cribb-Quince	3
Avoidance of rental liability	Moore Cribb-Quince	2
Location of facilities in residential areas	Kohlen-Fleming Cribb-Quince Newman Young	4
Suitability and practicality of site	Moore Cribb-Quince	2
Exceeding height restrictions / Height concerns and precedents in residential areas	Cribb-Quince Moore Young	3
Requirement for two masts/ Reduction of height	Cribb-Quince Smith	2
Decision is a fait accompli	Moore	1
Compliance with Industry Code	Cribb-Quince	1

**PROPOSED TELECOMMUNICATIONS INFRASTRUCTURE
LOT 4 (1) CONGDON STREET COTTESLOE WA
SUMMARY OF SUBMISSIONS**

Summary of Comments Received

A total of 8 submissions were received in relation to the proposal (multiple submissions from the same submitter were counted as a single submission). The submissions are summarised along with our responses to them in the attached table.

Carrier's Consideration of Comments

Health concerns - Electromagnetic Energy (EME)

Community concerns regarding EME are acknowledged. The proposed mobile base station at the subject site is designed not only to comply with, but to operate significantly below, the mandated standard for EME as set down by the Australian Radiation and Nuclear Safety Agency (ARPANSA), which is also the safety standard recommended by the World Health Organisation (WHO).

Telstra takes the health and safety of the public extremely seriously and acts in accordance with all legislation and standards. Telstra relies 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 consensus is that there is no substantiated scientific evidence of adverse health effects from the EME generated by radio frequency technology, including mobile phones and base stations, when used in accordance with applicable standards.

The EME predictive report prepared by Telstra indicates that this facility is estimated to equate to a maximum of 3.48% (around one thirtieth) of the Australian Communications and Media Authority (ACMA) mandated exposure limits. The predicted level at the nearby child care centre is estimated to be only 0.094% (less than one hundredth) of the mandated level.

The (ARPANSA) EME predictions report a worst-case scenario for the nominated systems in the report including:

- base station transmitters operating at maximum power (no automatic power reduction)
- simultaneous telephone calls on all channels
- an unobstructed line of sight view to the antennas.

In practice a worst-case scenario is rarely the case. There are often trees and buildings in the immediate vicinity, and cellular networks automatically adjust transmit power to suit the actual telephone traffic. The level of EME may also be affected where significant landscape features are present and predicted EME levels might not be the absolute maximum at all locations. Should a new technology be introduced or another carrier installation occur then the worst case predictions will increase. If this were to occur Carriers are obliged to carry out a Deployment Code process 7 consultation / notification to inform the public of the changes. Currently predicted EME levels are already substantially well below ACMA mandated exposure limits, which is very low relative to other sources of EME that can currently be found in the environment.

Health concerns (asbestos)

Three submissions raised concerns that asbestos may be present in the existing building and the proposed works may result in possible health risks.

As with any works, should asbestos be encountered, management of the risk will be in accordance with Australian standards and occupational health and safety regulations.

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Visual amenity

All 8 submissions raised concerns with the impact on the visual amenity of the facility, which is proposed to be located on the roof top of the existing telephone exchange building.

In order to reduce the visual impact of the facility, and in consultation with the Town of Cottesloe, Telstra reduced the proposed height of the antennas from one (1) 14 metre structure (to carry the six proposed antennas to two (2) 7.5 metre structures (each with 3 antennas) with the antenna structures to be concealed within faux brick chimneys. The design and location on the roof top have been chosen so as to minimise the visual impact of the infrastructure on the surrounding residential area. The equipment cabin and associated cabling and electronics shall be contained within the building.

Camouflaging of facilities has been used successfully in other areas (e.g. Mount Hawthorn Exchange, Windsor Theatre Nedlands), however, Telstra is happy to redesign the facility in accordance with Council's and the community's recommendations. Options include bare, but close mounted antenna facilities as seen throughout WA and plain shrouding, in any recommended colour.

Requirement for facility / Reason for re-location

One submission queried (and others intimated) the network necessity for the facility.

As a result of the ongoing difficulties with maintaining the buildings at a standard to which its residents deserve, Amana Living has announced the closure of the nearby Sundowner Hostel and Village, which currently has Telstra telecommunications infrastructure (mobile phone base station) thereon. Telstra has been requested to remove its existing mobile phone facilities from the building.

This will result in a substantial reduction in mobile phone coverage and capacity in the immediate area. Accordingly, it is necessary for Telstra to provide replacement telecommunications facilities to maintain the communications needs of the community.

Additionally, Telstra has identified a need to improve mobile service for the business and residential communities in the Cottesloe, Claremont and Peppermint Grove localities, currently not adequately serviced. Due to increasing demand, existing base stations servicing the area are approaching capacity. The proposed base station will address the forthcoming reduction in coverage and capacity and meet the increased demand of existing customers and will also accommodate expected growth.

The proposed mobile base station site was chosen by Telstra as it best meets the objectives of providing customers high quality mobile voice, video and wireless broadband coverage while taking into account environmental and visual aspects of the facility.

Alternative sites

A number of submissions suggested alternative sites as suitable for telecommunications facilities. Site selection requires consideration of a number of factors, including but not limited to tenure, radiofrequency coverage, zoning, surrounding land uses, topography, and proximity to other facilities.

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Suggested sites in the vicinity of the Cottesloe and Claremont shopping areas, and further west are too far removed from the area in question for effective radiofrequency coverage.

In selecting network base station sites Telstra, in accordance with the requirements of Industry Code C564:2011 Mobile Phone Base Station Deployment (**Code**) has applied the Precautionary Approach to site selection and infrastructure design. Telstra endeavours to utilise existing mobile network sites as extensively as possible, or share other forms of existing or proposed infrastructure.

Detailed investigations of the locality revealed no other opportunities to co-locate telecommunications infrastructure which would satisfy the coverage objectives for the facility.

In areas such as this proposal, it is often difficult to find suitable sites that have significant separation from residential development. The solution proposed is not uncommon and can be found near and within many residential areas across Australia. Whilst it is clearly Telstra's objective to establish facilities with separation from dwellings and sensitive sites, it is not always possible. Where it is not possible, Telstra endeavours to devise a design solution that is visually unobtrusive. In this case camouflaged antennas on an existing telecommunications exchange building was deemed to be the best visual solution to provide network coverage.

Carriers' current networks have the capacity to provide coverage at very low power levels when facilities are sited in the most efficient manner. If this is not achieved, individual sites further removed are required to operate at higher power levels and may still not provide adequate coverage. The subject site offers the best option for meeting consumer demand in the most environmentally prudent fashion.

In light of the above, it is considered the subject site has been selected with due regard to the provisions of the Code pertaining to the Precautionary Approach to site selection.

Property values

It is not uncommon for mobile telephone network base station facilities to be located in and adjacent to residential areas. The proposed facility is not anticipated to have a significant detrimental effect on the visual amenity of the area.

Property values may increase or decrease for a variety of reasons. However, Telstra is not aware of any credible evidence to suggest that the installation of the telecommunications facility in the vicinity of a property would influence property values. Notwithstanding, property values are not valid town planning considerations.

Consultation process

A number of submissions commented on the Council's community consultation process. Some submitters considered the proposal should be determined by council in an open and transparent manner at a Council meeting. Some submissions commented that they were initially unaware of the matter as the Council had not sent notice of the proposal despite being local residents. One submission complained of the short timeframe for response.

Response to these comments is outside Telstra's area of responsibility, although it is now understood the matter may be referred to Council for determination at an Ordinary Council Meeting.

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Proliferation of future facilities

Two submissions raised concerns that once approved, other Carriers may elect to install additional facilities in the area. Telstra cannot comment on other Carriers requirements, but the proposed facility is a replacement facility to that being removed from the Amana building and accordingly does not add to the proliferation of facilities in the area.

Telstra is unaware of any necessity for new facilities in the immediate area.

Structural Integrity

Concerns were raised that there was risk of injury or damage by the infrastructure should it collapse for any reason. Telstra has erected many similar structures throughout Australia, and at all times complies with Australian building standards. Structural design and certification will be undertaken following approval of the application, if granted.

Avoidance of rental liability

Two submissions intimated that the site was selected to avoid lease payments. Telstra leases many thousands of sites throughout Australia at commercial rates and leasing costs are considered part of the cost of the business. Commercial terms are a confidential matter and not a valid consideration for objection.

Location of facilities in residential areas

A number of submissions questioned the need to locate mobile phone facilities in residential areas. To be effective, mobile phone base stations must be located in the area to be serviced by the facility. Telstra will always endeavour to identify locations within commercial, rural and industrial areas where possible. In areas such as this proposal, it is difficult to find suitable sites that have significant separation from residential development. The solution proposed is not uncommon and can be found near and within many residential areas across Australia. Whilst it is clearly Telstra's objective to establish facilities with separation from dwellings and sensitive sites, it is not always possible.

Suitability and practicality of site

Two submissions questioned the suitability and practicality of the site. Reference is made to items; *Location of facilities in residential areas*, *Alternative sites* and *Requirement for facility* above. Following investigation and discounting of candidate sites in the area, Telstra assessed the proposed site as the most suitable and practical location to achieve the coverage objectives with minimal impact on the community.

Exceeding height restrictions / Height concerns and precedents in residential areas

Concern was raised in three submissions that the structure would exceed Council height restrictions for the area and may be used as a precedent by developers to justify overcoming height restrictions for other structures in residential areas.

Town of Cottesloe Town Planning Scheme 2 addresses height restrictions for walls and buildings. The proposed facility is deemed infrastructure. Development applications for other buildings and structures are assessed on their merits, and determined, by the Town in accordance with its Scheme and Design Guidelines.

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SUMMARY OF SUBMISSIONS**

Requirement for two masts / Reduction of height

One submission enquired as to the reason for two masts and the number of antennas intended for the facility. In order to achieve its coverage objectives Telstra requires six antennas on the facility, which initially required a 14 metre structure to carry the proposed antennas. Telstra subsequently designed a facility with two 7.5 metre structures (each with 3 antennas) with the structures to be concealed within faux brick chimneys. The reduced height and location of the antennas on the roof top have been designed so as to minimise the visual impact of the infrastructure on the surrounding residential area.

Another submission suggested Telstra divide the antennas structures into 4 or 6 smaller masts to reduce the visual impact. Apart from creating a proliferation of structures on the roof top there are a number of technical reasons why this is unsuitable, including insufficient height to meet coverage requirements, radiofrequency signal conflict and health and safety factors.

Decision is a fait accompli

A submission claimed approval of the proposal was a *fait accompli*. The application is subject to determination by the Town of Cottesloe, after consultation the community, and assessment of the proposal's compliance with the Town's Planning Scheme. Telstra is happy to work with the community and Council to achieve an acceptable outcome. Approval is by no means taken to be a *fait accompli*.

Compliance with Industry Code

One submission stated that it was '*not clear that the Industry Code for mobile phone base station deployment has been complied with*'.

Telstra, at all times, complies with the requirements of Industry Code C564:2011 Mobile Phone Base Station Deployment (**Code**), the Telecommunications (Low-impact Facilities) Determination 1997 as amended (**Determination**) and the Telecommunications Act 1997.

The proposal was assessed under the provisions of the Determination and determined not to be 'low-impact' for the purposes of the Determination. The fact that the proposed facility has been determined not to be 'low-impact' requires the proponent to apply for, and receive, Approval to Commence Development under State planning laws, in accordance with Part 2 of the Determination.

Telstra has, in selection of the subject site and design of the proposed infrastructure, applied the Precautionary Approach mandated by Sections 4.1 and 4.2 of the Code.