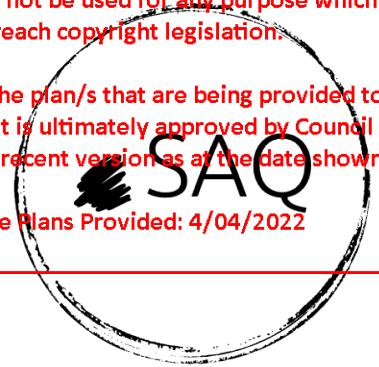


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Date Plans Provided: 4/04/2022



SAQ Consulting Pty Ltd

ABN 76 864 757 592

P O Box 50

Clayfield QLD 4011

Our ref: Wyndham Vale Station

22 December 2021

Sam Chen
Senior Town Planner
Wyndham City Council
P O Box 197
WERRIBEE VIC 3030

Dear Sam

**RE: WYP13249/21 - Proposed telecommunications facility
Wyndham Vale train station, Armstrong Road, Manor Lakes**

As previously advised, **SAQ Consulting Pty Ltd** acts on behalf of Optus Mobile Pty Ltd ('Optus') in respect of this application.

The proposal by Optus is to establish a telecommunications facility, in the form of a mobile telephone base station, at the Wyndham Vale train station in Manor Lakes.

The proposed facility is required to provide improved Optus network services to the surrounding area, which includes an existing and expanding residential and commercial/retail area, as well as the rail corridor.

The proposed facility comprises a 30m-tall monopole, panel antennas and equipment cabinets close to the Armstrong Road frontage near the southern end of the station. The subject land is located within the *Public Use – Transport Zone (PUZ4)* as set out in the Wyndham Planning Scheme.

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

A brief cover letter was provided at the time of lodgement. This letter constitutes a detailed planning statement as to the merits of the proposal to assist Council with its determination of the application, including against the Planning Scheme and Development Plan as well as the Victorian Telecommunications Code of Practice. The necessary fees have been paid.

Need for the Facility

The proposed facility is needed to provide improved 4G network coverage and capacity to the area surrounding the Wyndham Vale train station at Manor Lakes. New 5G services will also be introduced as part of the proposal as they are not currently available in the area.

Figure 1 below shows an extract from www.rfnsa.com.au, which is essentially a database of all existing (and proposed) facilities in Australia. As indicated on the extract, the proposed facility

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(marked with an orange square) is located approximately 1 kilometre from the nearest existing Optus facility at 418-434 Ballan Road (Wyndham Vale Christian Centre), situated to the east of the train station. The next nearest existing Optus facility is 1.5 kilometres to the south at 205 Greens Road.

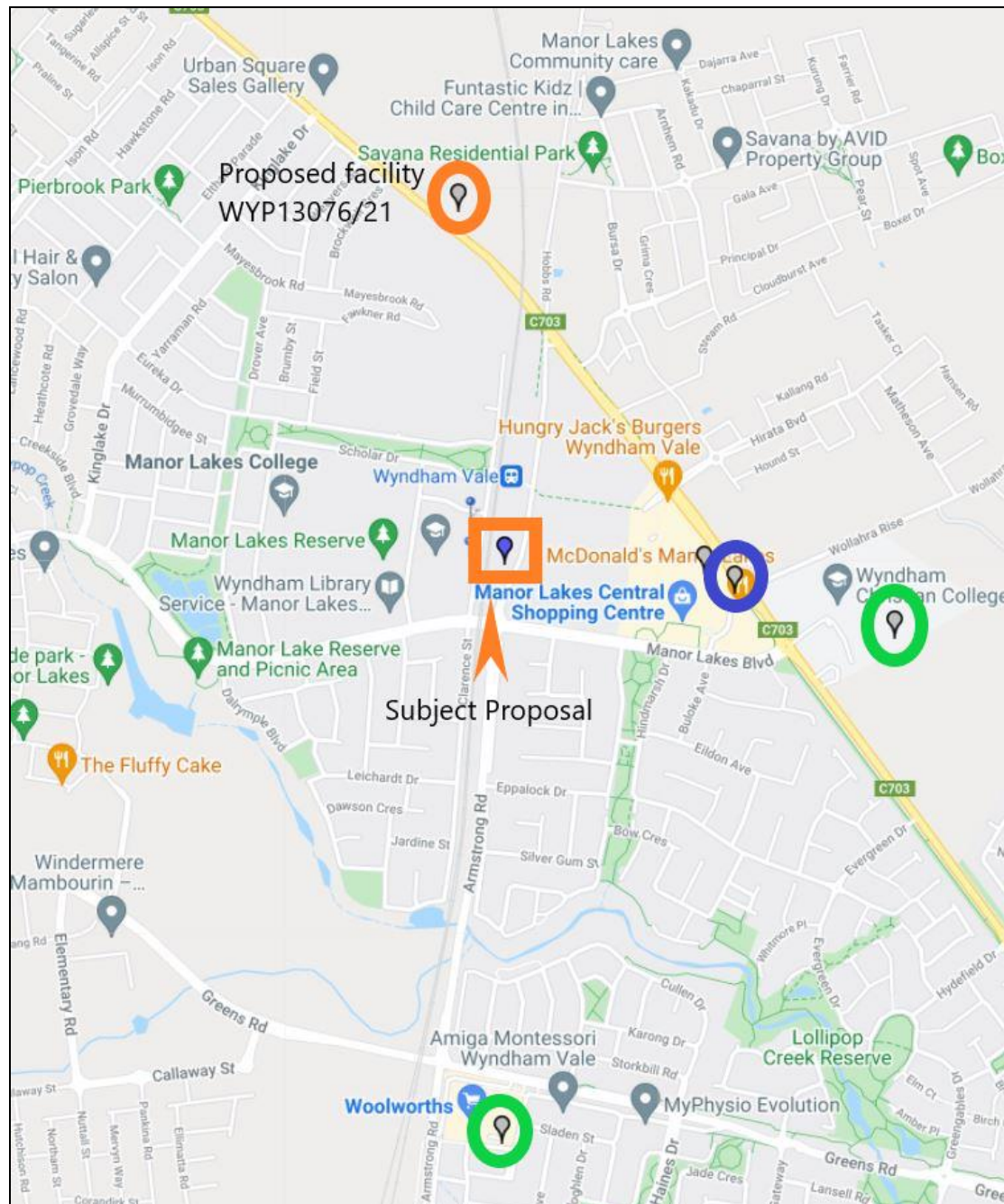


Figure 1: Proposed Location (orange square) and existing facilities in surrounding area (Key: Optus – green, Telstra – blue)

A third Optus facility shown on the map extract at 772 Ballan Road is currently the subject of a development application (WYP13076/21) and will be approximately 1 kilometre from the train station. Once all four facilities are in place this will provide a good level of service throughout this developing area.

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It is noteworthy there are no existing base-stations to the east of Armstrong Road, meaning much of the residential area of Manor Lakes is poorly served currently.

It is also noteworthy that the only other existing base station facility in the area is the Telstra facility at the Manor Lakes Central Shopping Centre, which is located on top of a pylon sign fronting Ballan Road. Not only is this structure not suitable for collocation, it is too close to the existing Optus facility at the Christian Centre and could not meet the network improvements sought west of Armstrong Road in particular. There are no other existing facilities in the area and as such collocation is not an option in this instance.

At distances of more than 1 kilometre between base-stations, particularly in metropolitan areas, 4G services are unreliable with generally poor data performance and indoor service. Given the sheer size of the residential population in the area – both current and expected – the current network configuration simply cannot deliver adequate network coverage or capacity and additional facilities are required.

As such, based on the location of the existing Optus facilities, there is a clear need for a new facility in the central/western part of Manor Lakes. The existing facilities are simply too far away for upgrading or expansion of those facilities to achieve the required improvements.

The situation is even more problematic for 5G services, which require an even greater density of facilities than 4G. 5G services are not currently available in the Manor Lakes area but will be introduced as part of the subject proposal, increasing network capacity and data speeds in the area. The current Optus 5G coverage available in the wider area is shown in Figure 2 below.

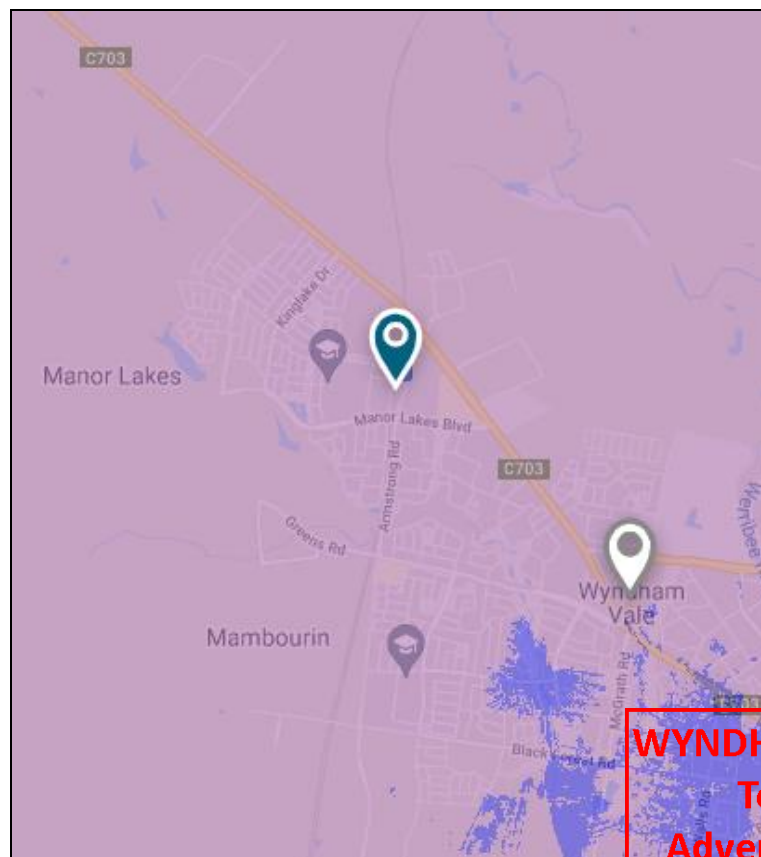


Figure 2: Existing Optus 5G coverage in the area (dark purple with subject land marked)

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As there are no collocation opportunities available and no suitable buildings or other structures on which to place the proposed facility, a new structure is required in this instance.

The Proposal

The proposal is to establish a new telecommunications facility in the form of a monopole, antennas and equipment cabinets at the Wyndham Vale train station. The details of the facility are shown on the plans lodged with the application.

More particularly, the proposal consists of the following elements:

- a 30-metre tall monopole and compound located near the southern end of the bus station, just off Armstrong Road;
- a new square headframe mounted at the top of the monopole to accommodate four panel antennas for 4G and eight panel antennas for 5G services;
- new 4-bay equipment cabinet (dimensions 2.32m H x 0.75m D x 2.87m L), connected to the monopole by a cable tray;
- Various ancillary infrastructure such as pits, cabling and other necessary connections; and
- 2.4m high security fencing with double access gates.

All cables connecting to the antennas will be internal to the monopole, except where they exit the monopole to connect to the relevant antennas. The monopole does not have any provision to allow it to be climbed. The monopole and antennas can be coloured/painted if desired to assist in mitigating visual impact.

Whilst not a relevant planning issue, it is worthy of note that the maximum levels of electromagnetic energy from the proposed facility at 1.5m above the ground is estimated at **2.48%** of the exposure limits mandated by the Commonwealth Government and as such the proposed infrastructure will be in compliance with the ACMA EME regulatory arrangements. A copy of the standard form EME report is **attached** for Council's information.

The facility will comply with Australian Government regulations in relation to emission of electromagnetic energy(EME), this specifically being *Australian Standard Radiation Protection Standard – Maximum Exposure Levels to Radiofrequency Fields –3 kHz to 300 GHz*, published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in 2002.

The location will be accessed by way of the existing cross-over and driveway arrangement from Armstrong Road.

Subject Land

The subject land is located on the western side Armstrong Road at Manor Lakes and forms part of Regional Rail Link rail corridor and associated infrastructure. This particular part of the corridor is the site of the Wyndham Vale train station and bus station, both of which are located to the east of the railway tracks, which in turn runs in a deep cutting at this location.

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For the purposes of this application, the subject land is effectively bounded by Armstrong Road to the east, Ballan Road to the north, Manor Lakes Boulevard to the south and Academy Way to the west, as shown below in Figure 3. The subject land is located in the Public Use Zone (PUZ4 - Transport).



Figure 3: Wyndham Vale Train Station complex, with subject location marked (red square)

As well as the train and bus station, there is extensive commuter parking on both sides of the railway tracks as well as some landscaping.

The proposed facility will be located at the southern end of the site, just south of bus station and about half way between Armstrong Road and the railway corridor. Access to the

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proposed facility will be via the existing driveway and crossover arrangement from Armstrong Road.

Both VicTrack and Department of Transport have approved the selected location and there is not expected to be any impact on the continuing functioning or future expansion of the train or bus stations.

The Locality

The surrounding locality has a number of key features, with the railway corridor effectively splitting the area into east and west.

The key features, which are shown generally in the locality plan at Figure 4, are:

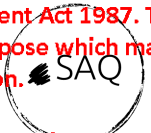
- The established residential areas to the south of Manor Lakes Boulevard (north of Lollypop Creek) and west of Minnidee Road
- The Manor Lakes Central Shopping Centre and large commercial zone east of Armstrong Road
- The developing residential area to the north-east (across Ballan Road)
- The education precinct on the western side of the rail corridor (west of Academy Way)
- Large vacant parcel of land around Fawkner Road



Figure 4: Subject locality, with subject location marked (red dot)

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The closest residence to the proposed location is situated 160 metres to the north-west and the proposed facility will be approximately 75 metres from the boundary of the education precinct.

Assessment against the Planning Scheme

As noted above, the subject land and proposal is located in the *Public Use Zone* (specifically, PUZ4) pursuant to the Wyndham Planning Scheme. In this zone, a telecommunications facility such as that proposed requires a permit.

The PUZ4 zone is to be primarily for transport-related purposes and consistent with that the subject land is the site of the Wyndham Vale train and bus stations along with extensive commuter carparking.

Public Use Zone

The purpose of the Public Use Zone is stated as:

To implement the Municipal Planning Strategy and Planning Policy Framework.

To recognise public land use for public utility and community services and facilities.

To provide for associated uses that are consistent with the intent of the public land reservation or purpose.

The proposed facility, the location of which has been approved by both VicTrack and Department of Transport, is consistent with the purpose of the *Public Use Zone* in that it is a suitable zone in which to locate infrastructure for public utility and community services.

The proposed facility is also clearly an 'associated use' this is consistent with the intent of the public land's purpose in this instance, given the railway station precinct has also been developed to support the population growth in the area. The proposed facility will provide improved levels of telecommunications to the surrounding residential and commercial area as well as the railway station and corridor.

In terms of the decision guidelines:

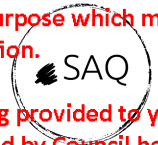
- The location has been approved by the public land manager
- The proposal is appropriately sited to provide the necessary improvements to telecommunications in the surrounding area and avoids any conflict with the train and bus station, including any future expansion.

Accordingly, the proposal is consistent with the intent of the land zoning and decision guidelines and clearly the most compatible zone within the locality for such a facility.

Overlays

The subject land is affected by a small number of overlays, namely Design and Development, Melbourne Strategic Assessment Area and Aboriginal Cultural Heritage.

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The location selected is NOT impacted by the Design and Development Overlay and is exempt from a CHMP based on the questionnaire at <https://www.aav.nrms.net.au/> (process form attached). As both VicTrack and Department of Transport have approved the location of the facility, there are no strategic assessment issues raised.

As such, the overlays affecting the land are not adversely impacted by the proposed facility.

Infrastructure Provisions

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

The Objective of the Scheme in this respect is:

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

The Scheme also lists a number of strategies, which are:

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

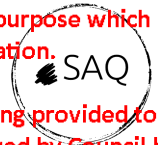
Ensure a balance between the provision of important telecommunications services and the need to protect the environment from adverse impacts arising from telecommunications infrastructure.

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

In this instance, the proposal will provide a new telecommunications facility specifically to improve the level of Optus 4G/5G service to the area around the subject land, which includes existing and developing residential, existing and developing commercial, community/educational uses and the key transport corridors.

As there are no opportunities for collocation or any other structures on which the facility could be placed, a new structure is required, which has been appropriately located within the zone to ensure a high level of service can be provided to the surrounding area.

As such, in this instance an appropriate balance between the need for the facility and its impact on the environment has been struck.



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It is also a requirement of the Scheme that the Code of Practice for Telecommunications Facilities in Victoria (Department of Sustainability and Environment, 2004) be considered. This is reinforced by Part 52.19 of the Scheme and an analysis of the Code is also set out below.

Telecommunications Facility (52.19)

The Planning Scheme also specifically mentions telecommunications facility at 52.19.

The key purpose of this part of the Scheme is to ensure telecommunications facilities:

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

The need for the facility, its benefits and likely impacts on amenity have already been set out above and will meet the communications needs of the community.

The proposed facility is neither a 'low-impact facility' nor exempt by some other means (such as the Victorian Code). As such, a permit is required.

An assessment against the Code is set out below.

Victorian Telecommunications Code of Practice

With respect to the Code, the proposed facility is not one set out in Section 5 of the Code and therefore requires a permit.

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

Principle 1:

- No heritage places are affected by the proposed facility;
- The equipment cabinets will be located well away from the residential area and main roads;
- No street trees will be lopped, pruned or removed;
- The location of the proposed facility does not impact on significant views; and
- The proposed facility has been designed and sited to minimise its impact to the extent it can.

Principle 2:

- There are no existing buildings or structures in the area that would permit collocation to occur and the technical and network requirements to be met.

Principle 3:

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

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Principle 4:

- The subject land and surrounding street network will allow for very straightforward construction of the facility with no unreasonable danger or impediment to traffic or pedestrian movement;
- No flora or fauna will be removed or disturbed;
- Construction will occur at appropriate times (and can be conditioned to ensure compliance if Council sees fit to do so); and
- As part of any construction, any damage caused to Council or public infrastructure will be remediated back to its original condition.

As such, the need, siting and design of the proposed facility complies with the Principles and intent of the Code.

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Conclusion

The proposal by Optus is to construct a new telecommunications facility in the form of a 30m tall monopole at the southern end of the Wyndham Vale train station (adjacent the bus station) at Armstrong Road, Manor Lakes. The proposed facility will allow Optus to provide significantly improved services to the surrounding area, including the introduction of 5G services.

Existing services are currently inadequate due to the large distances to existing Optus facilities and significant improvements (requiring additional infrastructure) are necessary in order to provide for the strategic importance of the railway corridor and station and anticipated increase in population in the area, as well as an expanded commercial area to the east. To that end, the proposed facility is consistent with the *Public Use* zone purpose and has the approval of VicTrack and Department of Transport.

The facility is proposed in an appropriate location on the subject land which does not impact on the current use and function of the subject land or the desired future outcomes, or that of surrounding land. Visual impact from the proposed facility is limited due to its placement at the train station and generally away from residential uses (more than 160 metres).

The proposal represents an orderly placement of the facility on the subject land and is established having regard for the existing surrounding Optus network. The proposal is consistent with the intent of the zone and does not materially threaten or compromise the desired outcomes of the zone, while providing an essential service to the area.

I consider the subject proposal sufficiently accords with the strategic and practical intent of both the Planning Scheme, the State telecommunications facilities code and the realities of the subject land, zone and locality.

Accordingly, the application warrants a planning permit.

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

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Mark Baade'.

MARK BAADE

B. Plan (Hons)

M: 0417 088 000

mark@saqconsulting.com.au

Attached:

EME Report

Dept Premier and Cabinet process checklist

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Environmental EME Report

Location	Wyndham Vale Train Station, 615 Armstrong Road Manor Lakes, WYNDHAM VALE VIC 3024		
Date	03/05/2021	RFNSA No.	3024019

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How does this report work?

This report provides a summary of levels of radiofrequency (RF) electromagnetic energy (EME) around the wireless base station at Wyndham Vale Train Station, 615 Armstrong Road Manor Lakes, WYNDHAM VALE VIC 3024. These levels have been calculated by Lend Lease using methodology developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).

A document describing how to interpret this report is available at ARPANSA's website:

[A Guide to the Environmental Report.](#)

A snapshot of calculated EME levels at this site

There are currently no existing radio systems for this site.

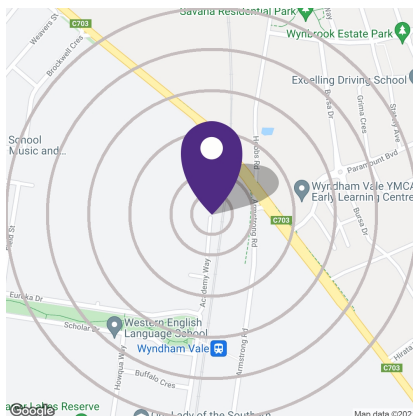
The maximum EME level calculated for the proposed changes at this site is

2.48%

out of 100% of the public exposure limit, 80 m from the location.

EME levels with the proposed changes

Distance from the site	Percentage of the public exposure limit
0-50 m	1.46%
50-100 m	2.48%
100-200 m	2.19%
200-300 m	1.82%
300-400 m	1.10%
400-500 m	0.62%



For additional information please refer to the EME ARPANSA Report annexure for this site which can be found at <http://www.rfnsa.com.au/3024019>.

Radio systems at the site

This base station currently has equipment for transmitting the services listed under the existing configuration. The proposal would modify the base station to include all the services listed under the proposed configuration.

Carrier	Existing		Proposed	
	Systems	Configuration	Systems	Configuration
Optus				LTE700 (proposed), LTE900 (proposed), LTE2600 (proposed), LTE2300 (proposed), LTE1800 (proposed), LTE2100 (proposed), NR3500 (proposed), NR2300

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Produced with RF-Map 2.1 (Build 3.0)

An in-depth look at calculated EME levels at this site

This table provides calculations of RF EME at different distances from the base station for emissions from existing equipment alone and for emissions from existing equipment and proposed equipment combined. All EME levels are relative to 1.5 m above ground and all distances from the site are in 360° circular bands.

Distance from the site	Existing configuration			Proposed configuration		
	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
0-50m				7.26	139.87	1.46%
50-100m				9.57	242.94	2.48%
100-200m				8.96	213.08	2.19%
200-300m				7.12	134.51	1.82%
300-400m				5.56	81.86	1.10%
400-500m				4.15	45.77	0.62%

Calculated EME levels at other areas of interest

This table contains calculations of the maximum EME levels at selected areas of interest, identified through consultation requirements of the [Communications Alliance Ltd Deployment Code C564:2020](#) or other means. Calculations are performed over the indicated height range and include all existing and any proposed radio systems for this site.

Maximum cumulative EME level for the proposed configuration

Location	Height range	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
No locations identified				

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Process List

Project Name: Wyndham Vale Station

Project Location: Manor Lakes

Date: 22-Dec-2021

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	QUESTION	ANSWER
Question 1	Is the proposed activity , or all the proposed activities, exempt?	No
Question 2	Are you undertaking a High Impact Activity as listed in the Aboriginal Heritage Regulations?	No
Answer:	<u>ON THE BASIS OF THE ANSWERS YOU HAVE ENTERED</u> YOU ARE NOT REQUIRED BY THE REGULATIONS TO PREPARE A CULTURAL HERITAGE MANAGEMENT PLAN <u>FOR THIS PROJECT</u>	
	This process list is for information purposes only; the result must not be relied upon by a statutory authority in deciding whether a cultural heritage management plan is required for a proposed activity.	