

Council Agenda - - Agenda Item 9.2 - Attachment 4
Response to Representations
13 Henry Street, Ravenswood

Mel Tuangthong
CPS Global
Level 9 – 256 Queen Street
Melbourne VIC 3000

2 March 2020

Brian White
Statutory Planning
City of Launceston
PO Box 396
Launceston TAS 7250

Dear Mr White,

Development Permit Application: DA0019/2020
Address: 13 Henry Street Ravenswood TAS 7250
RE: Response to Submissions

CPS Global (CPS) acting on behalf of Optus for the matter above.

We understand that the City of Launceston as the Responsible Authority has received submissions from four (4) individuals in response to the proposal. The concerns raised in the objections have been grouped into six (6) raised concerns which is discussed in detail below.

Background

Optus is deploying a new facility to help improve voice and data coverage in Ravenswood and nearby areas. The evidence provided in the planning report demonstrates the existing need for improved Optus coverage. A new facility is required to bring critical telecommunications services to the local area that other parts of Launceston currently enjoy. As an independent telecommunications provider, it is imperative for Optus to invest and develop infrastructure to serve its customers across Tasmania.

Co-Location on Existing Telstra and Vodafone Facility (RFNSA 7250025)

It is Optus' first preference to co-locate on existing facilities and new sites are only pursued when all co-location options have been exhausted. Unfortunately, there are no suitable existing facilities in the area that would meet the coverage requirements of the proposal.

As part of our preliminary site scoping exercise, the necessary enquiries have been made with Telstra to determine the viability of co-locating at their facility (RFNSA 7030026). This included locating Optus's equipment on a lower reservation and extending the height of the existing monopole.

There are impractical limitations to locating on the existing Telstra and Vodafone facility at 35B Castlemain Road Ravenswood TAS 7250 and the following points outlines why co-location is not an appropriate option:

Firstly, our engineers determined that the existing monopole has insufficient capacity to accommodate all carriers for the current network requirements and radio frequency objectives.

It would likely require significant reconstruction works to deploy Optus' equipment on the existing facility. This would likely include replacing the existing monopole and extending the pole to achieve Optus' desired elevation to achieve its radio frequency objectives. Telstra's equipment would need to be extended above forty-five (45) metres to retain the highest location for their telecommunications services and allowing for adequate separation between the carriers' antennas to avoid interference. The reconstruction or strengthening works would exceed the value of a new facility and therefore not be commercially viable or cost effective for any carrier including Optus to peruse.

Secondly, it must be recognised that Telstra is the owner of the tower and therefore their permission is required to redevelop the facility to accommodate Optus' equipment. Approvals from another carrier for such undertaking is not assumed. Government approvals will be required for the redevelopment of the facility and lease re-arrangement would be difficult to negotiate between the various stakeholders. Therefore, it would not be feasible nor practical to re-construct another two carriers' facilities that has their own network and coverage requirements.

Thirdly, in a recent VCAT decision in NBN Co Limited v Melton SC [2018] VCAT 827 (30 May 2018), the Tribunal considered an application with similar facts. It found that, while possible, it is not practical, efficient or cost-effective proposition to require colocation, it is required the full decommission of an existing tower and its reconstruction. While it is a part of another state's jurisdiction, we believe that facts are similar to mentioned VCAT decision and the City of Launceston should take the rationale into consideration as part of its development application assessment.

The new facility will ensure that other carriers can co-locate on the proposed facility reducing the need for additional facilities in the immediate or surrounding area.

Visual Impact

Optus acknowledges some residents are concerned about the visual impact of the proposed telecommunication facility. The net benefit of the facility in terms of providing essential 3G and 4G services greatly outweighs its unavoidable visual presence. The surrounding residential dwellings will have partial view of the telecommunication facility demonstrated by the provided photomontages; which we believe is reasonable and will have a moderate rather an adverse impact on the immediate residents and low impact on the wider community.

Visibility of similar vertical infrastructure is not uncommon in urban in particular residential areas. Infrastructure such as high voltage towers, power lines and telecommunication facilities can be found frequently across the City of Launceston as a result of urban growth. Such infrastructure tends to fade into the background of the view holder, and is likely that in time, the proposed telecommunications facility will do the same, given their relatively common occurrence in residential and semi-rural landscapes.

The height of the facility has been minimised to twenty (20) metres. The original proposal was for a thirty (30) metre tower. 15.6 A2.1 – Development Standards - Telecommunication Code in the Launceston Planning Scheme states that a facility height of thirty (30) metres within a Utilities Zone is considered to be an ‘acceptable solution’.

The reduction in height was done in recognition of the visual impact on the surrounding urban environment and operate at a height that is required for the operation of the facility. The central location of the facility has allowed Optus to reduce the height of the facility while maintaining its ability to achieve the radio frequency objectives. A height below twenty (20) metres would not be able to achieve the objectives.

The design of the facility has also been considered in context of the residential area. Rather than deploy a standard monopole and headframe design, the facility aims to achieve an optimal design outcome by utilising a slimline structure and reducing the overall bulk of the facility by using a turret headframe reducing the visual impact on the Ravenwood community.

As part of the permit conditions, Optus can provide a landscape plan and implement a reasonable strategy to mitigate the views of the facility. We also note that there is planned no removal of existing vegetation.

Electromagnetic Energy (EME)

As part of its network licence conditions, Optus must comply with the Australian standards and legislation to operate telecommunications services to which we are confident that all aspects are in compliance.

As indicated in the attached EME Report dated 10 January 2020, the maximum predicted EME level at ground level for the proposed site is 1.81% of the limit, at a distance of approximately one-hundred thirty (130) metres from the site, keeping in mind that exposure levels up to 100% are considered safe to all members of the public. This means that the total EME level from all wireless network transmitters operating at maximum power, 24 hours a day, will be many times below the limit set by the ARPANSA Standard for members of the public.

To further demonstrate the low EME levels of the proposal, we have undertaken further predictions at the adjacent residential building which shows a predicted maximum EME level at 0.22% of the ARPANSA exposure limits at a height ranging from 1 to 3 metres, which is significantly well below the standard.

Also note that measurement surveys have shown that levels measured after sites have been constructed are generally much lower than the predicted maximum levels. This is because the calculations do not include attenuation effects of trees, vegetation or buildings and are based on the maximum traffic level for this site.

Proximity to Residents and Schools

It is not uncommon to see telecommunications facilities in residential areas and near schools. In fact, it is essential for base stations to be in close proximity to the associated target coverage area so that they can operate at low power. This is becoming more prevalent in residential areas as networks develop to meet the needs of their customers in Launceston and the surrounding suburbs.

CPS on behalf of Optus has taken into consideration the different candidates within the vicinity of the proposed site. When formulating proposals for base stations, the objective of least environmental impact is to be sought where possible by sharing infrastructure; co-locating with other carriers or other available infrastructure and/or designing the base station to keep the amount of telecommunications equipment to a minimum.

Telecommunications facilities operate by transmitting and receiving signals in a given area. For a site to work effectively and given the very low power of the transmissions, line of sight to the area requiring coverage is necessary. Accordingly, it means that to cover the required areas, antennas will generally need to be located in these areas at an appropriate location.

The existence of telecommunications infrastructure in urban streetscapes is not a new phenomenon and an installation within residential areas is not considered out of the ordinary. Optus has carefully considered the proximity of community sensitive locations including residential dwellings in the vicinity of the proposed site and have determined that the calculated EME levels for this low powered site is inconsequential to the health and safety of the local community.

With regards to mobile base stations being placed in residential areas and community sensitive locations, the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) states that the standards which protect people from electromagnetic energy (EME) exposure do not set any distances between mobile base station locations and areas which may be considered to be sensitive.

ARPANSA goes on to say:

“Similarly, the ACIF Code¹ does not specify arbitrary distances at which infrastructure must be sited from community sensitive locations, because arbitrary distances do not necessarily reflect a precautionary approach. In fact, infrastructure sited further from a community sensitive area may need to operate at a higher power and may result in higher EME exposures in that sensitive area.”

¹The ACIF code has since been renamed The Mobile Phone Base Station Deployment Industry Code(C564:2018)

Property Values

The possible impact on property value as a result of the proposed development is not an impact that can be considered during the planning process. This is not an impact for which there is any evidence, and as such the proposal cannot be recommended for refusal on this ground.

Traffic

There will be minimal traffic to the proposed telecommunication facility outside the construction period. Twenty-four (24) hour accessibility is essential to meet the operational health and safety requirements in the case of emergencies.

During the construction phase, a truck will be used to deliver the equipment to the site. Traffic impacts associated with these vehicles would be of a short-term duration of two (2) weeks and are not anticipated to adversely impact upon the surrounding road network.

Traffic controllers will assist traffic management during construction in accordance with Australian Standard AS1742.3 – 2002 Manual of Uniform Traffic Control Devices on Roads.

The telecommunications facility will be unmanned, of low maintenance and remotely operated. As such, operational visits facilities will take place approximately one to four (1 – 4) times per year by qualified contractors for maintenance purposes. There is sufficient onsite parking space for a maintenance vehicle.

Construction activities will only be carried out in accordance with environmental guidelines, between the hours of 7.00am and 6.00pm, noise made during the works will be short in duration and comply with any noise standards.

I trust that this information has addressed the concerns of the community. However, should you wish to discuss this proposal further, please do not hesitate to contact me via email melt@cpsglobal.com.

Yours sincerely,

Mel Tuangthong
Town Planner
CPS Global (on behalf of Optus)



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2 March 2020

Brian White,
Statutory Planning
City Of Launceston
PO Box 396
Launceston TAS, 7250

Dear Mr White,

Development Permit Application: DA0019/2020
Address: 13 Henry Street Ravenswood TAS 7250
Re: Response to Submissions

I've been asked by CPS Global (CPS) acting on behalf of Optus for the above Development Permit Application to provide comment on submissions received in the course of the public consultation stage that relate specifically to the Visual Impact Assessment study dated 12 November 2019 undertaken by myself and submitted as additional information documentation to the Application.

General Comments

By way of first principals, it should be stressed that whilst retained by CPS Global (CPS) to undertake the said Visual Impact Assessment study (VIA), the process and assessments were undertaken entirely by myself. The report therefore represents solely my own considered professional opinions on the proposed development. The aim of the VIA was to provide an objective and factually correct interpretation of the characteristics of the surrounding area and to provide a qualitative (subjective) judgement on the potential impact that would occur as a result of the proposed development. These conclusions should therefore be viewed as a combination of objective measurement and subjective professional interpretation. Nonetheless, it must be acknowledged that visual assessment is determined by individual subjectivity, and that whilst assessments have been undertaken with objectivity, interpretation of impact and experience of 'place' is likely to differ from person to person.

Second, it should be stressed that the role of the VIA is not to determine whether the proposal would meet the provisions of the associated Statutory Planning Scheme, but merely to provide an objective indicator on the potential visual impact upon identified character zones and views within them. An assessment as to whether the proposed development would comply with relevant objectives and performance criteria has therefore not been undertaken. In the same manner, it is also not considered appropriate to offer comment or judgment on the views expressed in the representations received other than in the form of clarification and explanation where appropriate.

Representation relating to Viewpoint 5 – 6a Ravenswood Road

One Representation has been received relating specifically to the impact upon Viewpoint 5 – 6a Ravenswood Rd. The view in question is of the proposed mast 115 metres behind a relatively recent ‘back-land’ residential development, including its associated vehicular circulation space, landscaping, designated car parking structures and four terraces of dwellings. The VIA stated that the Sensitivity of the view was HIGH given its residential nature and close proximity to the proposal, but that due factors including orientation and internal layout of units, the most severe impact would be limited to only a small number of those properties closest to the rear boundary shared with the Applicants Compound and thus Magnitude was considered to be MODERATE.

The Representation states that the report failed to correctly interpret the likely day to day use of units within the rear terrace by mistakenly suggesting that only the living room rooms should be judged to be ‘principal’ rooms and that both front and rear yards were used equally and not primarily just that to the front of the unit. As such, the Representation suggests that the VIA is mistaken, and that the Magnitude should also have been identified as being HIGH.

The comments made within the representations deal primarily with the impact of the proposals upon the visual and residential amenities of the occupiers of these units. Within the VIA, I clearly acknowledge that internal observation within the units in question was not available or undertaken and that my comments were therefore based on observations made from within the communal areas of the housing development, along with Estate Agent information with regard to plan layouts and internal photographs (see attached).

<https://www.realestate.com.au/property/unit-6-6a-ravenswood-rd-ravenswood-tas-7250>

Second, I also acknowledge that the impact upon one unit, No.6, would likely be the most pronounced. However, with regard to the weight afforded to the issue of the visual amenities within private residences, it should be recognised that there is currently no national level guideline document for Landscape or Visual Impact Assessments in Australia, and that reliance is made on several guidance documents offered by other State Governments and bodies. Two of the more prominent guides however, ‘Guideline for Landscape Character and Visual Impact Assessment’ (EIA-No.4) of the Roads and Maritime Services, NSW Government December 2018; and the Australian Institute of Landscape Architects ‘Guidance Note for Landscape and Visual Assessment’ for the Queensland Govt. June 2018 both appear to recommend that VIA’s place greater emphasis on the potential wider visual impact within the public realm than that experienced within private properties.

When assessing the importance of views, for example in prioritising scenery and sightlines for planning scheme protection, or when evaluating the landscape and urban character of a place, views from accessible public spaces (streets, lookouts, parks etc.) are valued more than views available only from private residences. In general, no resident has a ‘right’ to a view...

(Pg9) Australian Institute of Landscape Architects ‘Guidance Note for Landscape and Visual Assessment – June 20108

Having regard to the above, the relative impact likely to be experienced within limited parts of these rear units was weighed against the number of properties largely unaffected and more importantly, the impact upon the more distant wider views from the public realm. As

such, whilst the VIA report does not deny that impact will be experienced within individual units, I was of the opinion that the impact upon Viewpoint 5 itself would be Moderate. Again, it should be stressed that the VIA report is not intended to provide guidance as to whether the proposed development would comply with the Policy Provisions E.15.0 Telecommunications Code, E.15.6 Development Standards and Part B, 4.1, of the Launceston Interim Planning Scheme 2015 which sets out its interpretations of the terms “habitable room’ and ‘primary frontage’, but rather provide a qualitative (subjective) judgement on the potential impact that would occur as a result of the proposed development.

Representation – View from Henry Street and Ravenswood Road

One representation states that

‘the tower proposed at 13 Henry St. would be located in an exceptionally prominent location. High on top of a ridge it will be clearly visible from two directions, the main road approaching Ravenswood and by a great number of residents on Ravenswood Rd and beyond, with nothing but sky behind it to blend into, in each direction.’

With regard to the comment above, the it is acknowledged within the VIA that the proposed development would occupy an elevated and prominent position on the upper slopes of the Tamer Valley overlooking a substantial ‘green’ wedge that runs along the northern and eastern edge of the North Esk River, separating Ravenswood and the adjoining suburb of Waverley from the main city of Launceston. Characterised by the openness of the land and its rural appearance, relatively close to the city centre of Launceston, it also provides long and extended views both up and down the wide Tamar Valley and the countryside beyond and is primarily associated with open land used for grazing and the keeping of horses.

The proposed Monopole, although moderate in height in relation to such forms of Telecommunication structures, would clearly be visible silhouetted against the open sky when traveling towards Ravenswood along Henry Street. However, it is also noted that the ridge contains agricultural associated buildings and mature plantings, areas of woodland and fencing associated with the provision of paddocks and that the proposed Monopole would stand within a roadside context of powerlines and properties overlooking the Valley, representing a clear signal of approaching urbanisation rather than as an isolated feature in the open landscape. Indeed, it is also noted that similar pieces of infrastructure are already a feature of the surrounding town and landscape, and that the edge of the Tamar Valley on both sides of Launceston have a multiple of similar monopoles and masts, as well as notable monopoles nearby within the Valley itself, including at Killafady and close to Henry Street on the Launceston side of the North Esk River. As such, it is my opinion that whilst the proposed Monopole would be largely visible when approaching from the south east, it would stand on the edge of, but not wholly within the open countryside, limiting the potential sense of visual discordance or significantly detracting from the characteristics of the Valley slopes.

With regard to its potential visual impact on views within Ravenswood Road, the proposed Monopole, although partially obscured by existing buildings and viewed in context with power poles and street trees would be clearly visible and form part of the backdrop of the streetscape. The sensitivity of the view reflects its suburban nature and thus a permanent residential environment. However, it also reflects the relative high use of the surrounding area for community use and movement to and through the suburb. It is therefore associated with the process of transiting to and from and movements within the suburb, including to several nearby institutions including a local school. It is therefore both established and dynamic and therefore more likely to be associated with elements of change or non-

permanence, increasingly so as it joins with Henry Street where Utility and Local Business Uses become prominent.

As such, whilst I would not agree that the proposed site of the Monopole could be described as 'an exceptionally prominent' location, the VIA report identifies that the proposal would be clearly visible from both the valley slopes and as you travel towards it on Ravenswood Road. The distinction however would be that it would stand largely on the edge of both the open countryside and the suburban townscape, providing a context to, but not visually dominating either of these distinctive characteristics. Indeed, acting as a transitional marker between the two.

Representations - Additional

'It will be a terrible blot on the horizon'

'Nobody wants these towers in their neighbourhood and for good reason, they are eyesores' 'These views are assets that have aesthetic and financial value to many members of our community, and therefore are worth preserving'

Although slender, monopoles are intrinsically industrialised structures and the proposed development would have the impact of injecting the built form into the wider vistas. As a single monopole, it is considered that this would likely interrupt a portion of the vista and play a reasonable influence upon the character of the wider viewpoint. It should however be acknowledged that such Monopoles are increasingly a largely ubiquitous feature within both urban and countryside alike and that with frequency, our perception of such structures as jarring elements can be reduced

I trust this provides a suitable set of responses to some of the comments made by Representors regarding this proposal. Please feel free to contact me however should you have any queries regarding the production of the VIA and the comments within.

Regards

A handwritten signature in black ink, appearing to read 'N. Booth', with a stylized flourish extending to the right.

Nick Booth

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