

## Appendix 4 - Response to Objections

Objection	Comment
Lack of justification as to why a new facility is required.	<p>Additional information was submitted by the applicant on 3 June 2019 in response to the objection from Axicom. The additional information provides greater justification as to why a new facility is required rather than upgrading the existing facility.</p> <p>The proposed facility is expected to improve coverage and network capacity in comparison to the existing facility.</p>
The existing facility is capable of accommodating future equipment installations.	<p>The existing structure was originally constructed by Vodafone over 20 years ago at 6 Production Road, Melton. The structure was subsequently sold to Axicom, with Vodafone no longer having any control over the structure. Vodafone pays an annual rent to Axicom based on the amount of equipment on the structure.</p> <p>In their objection, Axicom stated the existing facility currently hosts a single carrier and is capable of accommodating future equipment installations.</p> <p>In response, the applicant outlined there was no discussion about how practical an upgrade to the existing structure would be or the potential cost.</p> <p>The applicant sought advice from their procurement department and construction contractor and provided estimated costs comparing upgrading the existing structure and installing the new facility.</p> <p>The cost for the existing facility is likely to exceed \$200,000 depending on the strengthening works required to the tower and foundation. In comparison, the installation of the proposed monopole is estimated to be \$120,000 based on similar installations. Vodafone would be responsible for the installation of antennas, feeders and a new equipment shelter, with this estimated to cost \$35,000.</p> <p>Over a 30 year lease, the applicant calculated that Vodafone would be more than \$1 million better off over a 20-30 year timeframe rather than paying to upgrade the existing facility and incurring additional rent.</p> <p>The upgrade to the existing facility is therefore not considered practical, with the additional cost possibly resulting in an upgrade not proceeding or the rollout of future technologies delayed.</p>
There is no meaningful improvement in the overall network coverage based on the Independent RF Analysis.	<p>The Independent RF Analysis was a report submitted to support the Axicom objection. The Independent RF Analysis indicates the existing facility at 6 Production Road is capable of servicing the same area in its current form.</p> <p>The applicant sought their own radio-frequency advice to rebut the objection. In response to the objection, the applicant finds the Independent RF Analysis to have a number of serious shortcomings, with the study failing to consider the 'high band' component of Vodafone's coverage and using a strict measure of signal strength (-75dBm and -95dBm), rather than the more conservative -95dBm and -114dBm. Additionally, the study made no analysis of network capacity.</p>

	<p>As Council is not an expert in radio-frequency, the information provided suggests the proposed facility will improve network capacity and the overall performance and coverage of the local area.</p>
<p>The proposal is not supported by policy, particularly with regards to co-location.</p>	<p>An assessment of co-location opportunities was provided to Council and examined three sites within Melton at 6 Production Road, 4-6 Grant Court and 28 Gateway Drive.</p> <p>The facility at 28 Gateway Drive is 560 metres away from the proposed facility and only 30 metres in height. This facility cannot support co-location as the facility is too short and Vodafone's equipment is likely to be located beneath Telstra's, resulting in a facility that is less capable than the existing facility.</p> <p>The facility at 4-6 Grant Court is 45 metres in height, however it is located 590 metres away from the proposed facility. Again, it is likely Vodafone's equipment will be located beneath the existing Optus equipment, which would not provide the same level of existing coverage or the improvements being sought. The facility is also further away from the areas Vodafone is targeting.</p> <p>The proposed facility is looking at replacing the existing site at 6 Production Road. The new site can only be a few hundred metres from the existing site as it needs to continue serving the area already covered as well as provide for the longer-term improvements sought.</p> <p>Overall, the proposal has considered the applicable policies and has provided justification as to why co-location cannot occur. Additionally, the proposed facility will be nestled between the two buildings towards the south-eastern corner of the site, reducing the visual amenity of the ground level equipment associated with the monopole structure.</p>