

URBIS

# CONSULTATION REPORT

## CITY OF MELTON COMMUNICATIONS INFRASTRUCTURE POLICY

Prepared by  
Urbis for  
City of Melton



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## TABLE OF CONTENTS

Introduction.....	1
1. Outcomes of the Community Consultation .....	2
1.1. Community Information Sessions.....	2
1.2. Submissions Received.....	2
2. Conclusions and Recommendations .....	11
Disclaimer.....	13

### **TABLES:**

Table 1 - Submitters Comment and Policy Framework Response .....	2
Table 2 - Recommendations for the Policy Framework.....	11



# INTRODUCTION

The Melton Communications Infrastructure Policy Framework and Background Analysis paper were published on Councils website on 11<sup>th</sup> September inviting feedback from the community by 10<sup>th</sup> October 2017.

As part of this two community information sessions were held. These were advised on the Councils website, Facebook page and in the local newspaper. The sessions were held on Wednesday 20<sup>th</sup> September from 430-8pm at Caroline Springs Library and on Thursday 21<sup>st</sup> September from 430-8pm at Melton Library. Letters advertising this were also sent to key stakeholders which included:

- Telstra
- Vodafone
- Optus
- Mobile Carriers Forum
- NBN Co
- VicTrack

This report provides a summary of the submissions and comments raised and recommendations for the Policy Framework against each comment.

# 1. OUTCOMES OF THE COMMUNITY CONSULTATION

The consultation period closed on 12<sup>th</sup> October, following a request by Telstra to extend the period by two days. The following was received.

## 1.1. COMMUNITY INFORMATION SESSIONS

The two community information sessions were attended by four Urbis staff and three Melton City Council staff members.

No attendees from the public or other stakeholders apart from Councillors attended either session and thus no feedback was received from the community regarding the community information sessions.

## 1.2. SUBMISSIONS RECEIVED

Following the closing date, which was extended by two business day on request from Telstra, the only submissions received were from Telstra via their planning consultants, Acquire Comm Pty Ltd, and from the Mobile Carriers Forum who are part of the Australian Mobile Telecommunications Association who represent the interests and provided a submission on behalf of its members Telstra, Optus and Vodafone Hutchinson Australia.

Table 1 summarises the issues raised by both submissions and our recommendations for these in respect to the Policy Framework and Local Planning Policy.

**Table 1 - Submitters Comment and Policy Framework Response**

Comment number	Submitter	Submitter Comment	Comments and Recommendation for Policy Framework
1.	MCF	Section 8.2 of Background Analysis paper which states <i>“Specific high-level siting and design for locations within individual PSPs with an onus on the communications provider to submit design solutions compatible with surroundings. As part of this guidance Council can provide acceptable design solutions and locations within specific areas of PSPs”</i> does not end up as guidance within the Policy Framework	High level siting and design guidance is provided in section 3.1.6 and 3.2 of the Policy Framework as well as it is encouraged for carriers to discuss with VPA and Council for siting in these areas.  It is recommended that this section is clarified though more explicit guidance and principles of siting and design requirements.
2.	MCF	Section 3 of the Policy Framework  <ol style="list-style-type: none"> <li>1. Photomontages are limited to 2-3 rather than from any significant views, streetscapes, vistas, panorama and from any heritage place;</li> <li>2. Clarity on what represents a ‘nearby’ opportunity to co-locate;</li> <li>3. Concern that planning permits are to be conditioned to require a bond to be lodged with Council prior to commencement of works, and have asked for clarification why this is required.</li> </ol>	<ol style="list-style-type: none"> <li>1. Photomontages should not be limited by a minimum number should be decided on a site-by-site basis determined by Council.</li> <li>2. Noted and provide definition of what determines nearby (any site within 500 metres).</li> <li>3. Recommended that any planning permit shall be conditioned to require the applicant to reinstate or repair any damage to Council’s assets as a result of the development works to the satisfaction of Council.</li> </ol>

3.	MCF	<p>Section 3.1.1</p> <ol style="list-style-type: none"> <li>1. Concern over hierarchy of land uses on the basis that this may not be able to be met</li> <li>2. Disagree that need for facility is stated in Planning Permit application as need is established in Clauses 19.03-4 and 52.19 of the Melton Planning Scheme</li> </ol>	<ol style="list-style-type: none"> <li>1. Hierarchy is guidance only and would be assessed on a site-by-site basis.</li> <li>2. Carriers need to provide need for site as Clauses 19.03-4 and 52.19 only provide high level need for good telecommunications in an area and not specific need for a site.</li> </ol>
4.	MCF	<p>Section 3.1.2</p> <p>Analysis required to justify co-location stated in section 3.1.2 exceeds application requirements in 52.19-5 of Melton Planning Scheme and exceeds information required to satisfy principle 2 of the Victorian Code</p>	<p>Section 3.1.2 states the need for a carrier to provide analysis for co-location and if not possible state why this is the case. This is required to provide an adequate assessment on the suitability of a site subject of a permit location and to assist Council in the decision-making process to prevent a proliferation of individual facilities.</p>
5.	MCF	<p>Section 3.1.3</p> <p>It is common practise to utilise the Aboriginal Heritage Planning Tool to determine if a Cultural Heritage Management Plan is required for a proposed facility</p>	<p>Noted. No changes are recommended to this section of the Policy Framework.</p>
6.	MCF	<p>Section 3.1.4</p> <p>Clarify requirement that 'evidence should be provided to demonstrate that communications infrastructure will not impact upon airport operations'</p>	<p>Recommended that Policy Framework is updated in this section to provide written examples what would be accepted by Council as evidence that communications infrastructure will not impact upon airport operations.</p>
7.	MCF	<p>Section 3.1.6</p> <ol style="list-style-type: none"> <li>1. Council to provide more detail about acceptable land uses as described in PSP areas and types of facilities that would also be discouraged in these areas</li> <li>2. Photographs not fit for purpose</li> <li>3. Setbacks for rooftop infrastructure a concern in relation to EME rooftop safety compliance</li> <li>4. Turret headframes inconsistent with co-location objectives</li> </ol>	<ol style="list-style-type: none"> <li>1. Acceptable land uses are provided in Section 3.1.6 which are passive areas of encumbered open space. Consideration of a hierarchy of land uses in PSPs to be considered and what types of facilities will not be entertained.</li> <li>2. Noted. However, this section needs to provide examples of facilities that may be installed in the future and therefore are considered relevant.</li> <li>3. Noted. However, rooftop setbacks should be encouraged for good design where possible.</li> <li>4. Turret headframes can be used when initially installing a site. Council can and only should consider what is being applied for in permit application.</li> </ol>

8.	MCF	<p>Section 4</p> <ol style="list-style-type: none"> <li>1. Pre-application discussions welcomed but pre-application consultation should not be a mandatory requirement exceeding the notice requirements of Section 52(1) of the Act.</li> <li>2. Carriers will not provide coverage maps as it is not Councils role to assess the quality of the coverage and seek to balance this with planning requirements</li> <li>3. Carriers already consider community sensitive sites</li> <li>4. Visual Impact Assessment is too prescriptive and carriers would like to work with Council on finer points of this documentation.</li> <li>5. Pre- and post-installation EME testing is unnecessary to demonstrate compliance with Principle 3 of the Victorian Code</li> <li>6. Encouraged by Councils intention to host forums for an exchange of information about PSPs and how best to incorporate telecommunications in the preparation of a PSP.</li> </ol>	<ol style="list-style-type: none"> <li>1. Pre-consultation not stated as mandatory in section 4.</li> <li>2. Noted. However, the need for site is required to provide justification for site selection and aid in Council decision making process.</li> <li>3. Noted.</li> <li>4. Visual Impact Assessment is industry standard tool for assessing visual impact.</li> <li>5. Council should reserve right to provide this condition where community has concerns over this issue to provide them reassurance and clarity over this issue.</li> <li>6. Noted.</li> </ol>
9.	MCF	<p>Section 5</p> <ol style="list-style-type: none"> <li>1. Encourage Council to work with the carriers to develop agreements and a shared understanding of what is required when locating on Council land.</li> <li>2. Stipulation that Council will not accept proposals that are located within 100m of existing communications infrastructure has no policy basis or link to analysis in Councils Background Analysis Paper.</li> <li>3. Council not to make requirements in Section 5 so onerous that a carrier is forced to look at an inferior second choice.</li> </ol>	<ol style="list-style-type: none"> <li>1. Section 5 is very clear and prescriptive on land uses that are not considered acceptable on Council land and consistent with adopted Council policy.</li> <li>2. The 100 metres separation is to push co-location with existing facilities wherever possible on Council land and is detailed in the Background Analysis Paper. The Policy Framework does allow for the carriers to provide justification if this is not possible and therefore it is recommended that this specific provision remains within the Policy Framework</li> <li>3. As above. Policy guidance for Council owned land follows Council current strategies and Policies for Council owned land and is not considered onerous. The information requested is acceptable and expected in the context of Council as landowner requesting information from a</li> </ol>



			carrier seeking to use Council land
10.	MCF	Section 6 Suggestion that the “How do I complain” part of this section is broken into two parts, one for facilities that do not require Council approval and one for facilities that do require Council approval.	Recommend that this section is amended to comply with this suggestion. This will make it clearer for the community who is the correct contact as its acknowledged that sites acquired by carriers under the Commonwealth Act are not within Councils decision making process
11.	MCF	Appendix B and C Further work between carriers and Council should happen to refine the guidance in these appendices.	Recommended that this is tabled for discussion at the next carrier forum tabled as a result of the Policy Framework being implemented to seek clarification on changes to the Visual Impact Assessment and the Checklist of Submission Requirements
12.	MCF	Conclusions and Next Steps  <ol style="list-style-type: none"> <li>1. The MCF does not consider the Framework is consistent with State Planning Policy or the requirements in section 52.19 and the Vic Code.</li> <li>2. The MCF does not support implementation into the Melton Planning Scheme</li> <li>3. Changes slated to the Telecommunications (Low-Impact Facilities) Determination and the Industry Code for Deployment of Mobile Phone Network Infrastructure may impact upon the form and relevance of Council’s Local Planning Policy.</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted.</li> <li>3. Noted. In the event of changes to the Telecommunications (Low-Impact Facilities) Determination and the Industry Code for Mobile Phone Base Station Deployment being finalised, Council will review the Policy Framework as required.</li> </ol>
13.	Telstra	Summary Telstra finds many positive items in the Policy Framework but rejects more prescriptive items that would unnecessarily add time and cost to permit process, thereby causing delays in the deployment and maintenance of Telstra’s network.	Noted.
14.	Telstra	Section 1.1 Telstra believes that the draft policy be adopted by Council as a guide for carrier deployment with further amendments as suggested by them, without incorporating it into the Melton Planning Scheme.	Noted.
15.	Telstra	Section 2	The decision for all Communications Infrastructure Permit Applications to be decided at a full Council meeting is

		Telstra suggests that if an application meets all the requirements in the draft policy, satisfies all planning grounds and there are no significant objections, then Council's planners should be able to make a decision under delegation.	current Council policy and is not expected to be changed following implementation of the Policy Framework document or any Local Planning Policy within Melton's Planning Scheme.
16.	Telstra	Section 3.1  Telstra welcomes the increased clarity surrounding the guidance for siting and location of facilities in Melton.	Noted.
17.	Telstra	Section 3.1.6  Telstra supports Council's statement that communications infrastructure be incorporated into existing infrastructure such as light poles or sports field lighting to cause minimum disruption. Telstra would encourage a more formal process to be developed ensuring strategic planning and PSPs cater for the provision of mobile telecommunications facilities such as requiring the design of light/utility poles that can structurally cater for additional facilities. An example of this would be the way other essential services such as power, water and gas are provided to Melton residents through early planning with developers and utilities. There is a real opportunity to secure and plan for telecommunications sites early in the development of PSPs that is not reflected in the draft policy. Telstra considers that the onus should not just be on the carriers, but also developers and Council to ensure its residents of new developments have access to reliable mobile telecommunications as soon as possible.	The provision for Council, carriers, developers and the VPA to work together on communications solutions within PSPs is contained within section 4.4.1.
18.	Telstra	Section 3.2.1  The provision of telecommunications is determined by several disciplines including Radio Frequency Engineering, Design, Construction, Planning and Property. Telstra considers that dot points 1 and 2 above are desirable outcomes. However, to balance the requirements of all disciplines this may not always be achievable. Why these are not achievable is consistent with the comments provided by the MCF (rooftop EME compliance constraints, use of turret headframes limiting co-location and site where where the demand for telecommunications	Noted. However, rooftop setbacks should be encouraged for good design where possible.  Turret headframes can be used when initially installing a site. Council can and only should consider what is being applied for in permit application.

		outweighed the visual impact from the facilities).	
19.	Telstra	<p>Section 4</p> <ol style="list-style-type: none"> <li>1. Telstra states that The Planning and Environment Act clearly sets out notice requirements under section 52(1)(a), (b) and (d), the decision requirements of section 64(1), (2) and (3) and the review rights of section 82(1) of the Act. Melton Council is not permitted to require additional notice requirements under the Act, including pre- application consultation. Telstra undertake a rigorous internal review of all new candidates based on it experience in consulting thousands of communities across Australia. Whilst the Planning Permit process will require public notification undertaken by Council, any additional pre-consultation should be identified by Telstra. Telstra will consider all requests for pre-application by Council seriously, and will balance this with its own assessment before proceeding.</li> <li>2. Pre-consultation should not be prescribed by Council and should not influence Council decision making in the issuing of a permit under the Planning and Environment Act. Telstra requests this process flow item be amended accordingly.</li> </ol>	<ol style="list-style-type: none"> <li>1. Pre-consultation is not stated as mandatory in section 4 of the Policy Framework. Any recommendation by Council for pre-consultation is following a site analysis and recommended by Council during pre-application discussions. It is the carrier's discretion whether they follow this recommendation.</li> <li>2. Pre-consultation is a recommendation only on a site-by-site basis and this is shown in the Planning Application Submission Process flowchart.</li> </ol>
20.	Telstra	<p>Section 4.1</p> <ol style="list-style-type: none"> <li>1. Telstra requests that the statement within this section that requires detailed plans as a <i>minimum</i> be amended to recognise that pre-application discussions should sometimes occur earlier, prior to the development of designs.</li> <li>2. Telstra welcomes Council's assistance in any pre-consultation activities including the provision of address details, particularly where properties may not have letterboxes. Several Victorian councils have</li> </ol>	<ol style="list-style-type: none"> <li>1. Recommend that this request for site plans as a minimum requirement for pre-application discussions is amended to allow for early discussions with Council prior to a formal site being progressed by Telstra or any other carrier and therefore providing Council more input into the site selection process.</li> <li>2. Noted.</li> </ol>

		provided address details to Telstra, including PO box numbers, without supplying names to protect privacy.	
21.	Telstra	<p>Section 4.1.1</p> <p>Melton City Council is not permitted to require additional notice requirements under the Act, including pre-application consultation. Telstra agrees that pre-consultation is sometimes warranted, but should not be prescribed by Council. Telstra advises that additional information can be provided to Council to be sent with the prescribed notice under the requirements of the Planning and Environment Act. This could include a newsletter and/or consultation website address containing additional information about the proposal. Please note, this comment does not relate to proposed facilities on Council owned land where any additional requirements prior to lodgment of a planning permit can be requested by Council as part of the lease conditions.</p>	As discussed above pre-consultation is a recommendation and is intended to try to resolve issues prior to the formal planning permit process.
22.	Telstra	<p>Section 4.2</p> <ol style="list-style-type: none"> <li>1. Many of Council's proposed submission requirements are already required under Federal, State or local legislation. This includes those listed in section 2.1, plus additional legislation not listed such as CASA standards; MOS part 139- Aerodromes.</li> <li>2. Telstra can meet many of the additional requirements in the draft policy such as a written description of the need for the facility and coverage analysis. Please note that Telstra does not provide detailed coverage maps as coverage is not static.</li> <li>3. Dot Point 4 - <i>'A statement as to whether the communications infrastructure is within 500 metres of a community sensitive land use (refer to Section 3.1.1 for examples) and what steps have been undertaken to avoid community sensitive land uses and any steps to</i></li> </ol>	<ol style="list-style-type: none"> <li>1. This is noted section 4.2 seeks to formalise the submission requirements to provide clarity for this to carriers, Council and the community. CASA standards are addressed currently in section 4.2 as a pre-submission requirement where relevant to that permit application.</li> <li>2. The submission requirements allow for a written description for coverage requirements if coverage maps are not available by the carrier.</li> <li>3. Recommend that this dot point is amended to include reference to Deployment Code 4.1 document and that if this document is submitted with a planning permit, then this may fulfil this submission requirement. However, it recommended that a distance of 500 metres is retained as a guide.</li> <li>4. As noted on Page 5 of this report in response to the MCF comment on this issue - Visual</li> </ol>

		<p><i>provide pre-consultation to said sensitive land uses’.</i></p> <p>Telstra can meet the intention of the proposed draft policy requirement, but requests this section be amended to align with the current legislation by referencing the Deployment Code 4.2 Document and delete the nominated 500 metres reference. Pre-consultation is to be determined by the carrier as discussed previously.</p> <p>4. Dot Point 9 - <i>A detailed visual impact assessment, using a template detailed in Appendix C</i></p> <p>Telstra has concerns with the Methodology proposed for the draft policy Visual Impact Assessment Template. Specifically, the prescriptive elements of the Methodology, including the provision of no less than three photomontages, the use of cherry pickers or helium balloons, and the measurements relating to number of viewers and period of views.</p> <p>Telstra requests that further discussions are held with the Carriers to modify the Visual Impact Assessment Template. As a minimum, Telstra would like to reduce the number of photomontages required where appropriate, and engage in further discussions about how photomontages are developed. An example of this would be including the provision for drone technology, which may reduce costs, and increase accuracy. The measurement for number of viewers and period of views also requires further discussion such as how to measure numbers of viewers from transport or those on foot. A more general statement for these viewers is requested. This could include the utilisation of existing data on road use, or classifying the number of viewers based on the size of a shopping centre or road classification i.e. not actual numbers.</p>	<p>Impact Assessment is industry standard tool for assessing visual impact. Recommend inclusion into Policy Framework circumstances where this is and is not required as part of submission requirements. Clarification on photomontage production and how numbers and period of viewers are obtained for the Visual Impact Assessment should also be detailed in the Policy Framework to provide further clarity on this matter.</p>
23.	Telstra	<p>Section 4.3</p> <p>Regarding Conditions of consent relating to pre- and post-installation EME testing Telstra maintains that permit conditions relating to the</p>	<p>As stated in response to MCF comments on Page 6 of this report, Council reserve the right to provide this condition where a community has concerns regarding EME to provide them reassurance and clarity over this issue.</p>

		<p>monitoring and testing of EME levels are inappropriate and <i>ultra vires</i>.</p> <p>Telstra also state that It is important to note that VCAT has stated in Mason v Greater Geelong CC (Red Dot) [2013] VCAT 2057 (16 December 2013) that is bound to apply the ARPANSA standards and is unable to consider emissions of electromagnetic radiation as a relevant or determinative issue where the relevant Commonwealth ARPANSA standard will be met.</p>	
24.	Telstra	<p>Section 4.4</p> <p>Telstra confirms its interest in the involvement of the annual Melton forum for telecommunications deployment. In addition, Telstra are also interested in briefing newly elected councilors on the provision of communications infrastructure within Melton.</p>	Noted.
25.	Telstra	<p>Section 5</p> <p>Whilst this section may be inappropriate to include in a planning policy document, it is extremely important to have a process to enable to the efficient provision of reliable telecommunications to Melton residents, particularly in Melton's growth areas.</p> <p>Telstra would like to further refine the leasing process to develop a Master Agreement with the City of Melton to reduce delays in deployment due to negotiating commercial terms on individual sites. A Master Agreement would provide Telstra with commercial confidence to proceed with candidates on Council owned land, particularly on sites that Council have identified as being appropriate solutions such as co-locating on its public infrastructure such as light poles.</p>	Council does not consider that entering into a Master Agreement would significantly reduce time in the negotiation process due to the site-specific provisions required within individual leases and the need to update following changes in legislation.

## 2. CONCLUSIONS AND RECOMMENDATIONS

The consultation undertaken resulted in only two submissions; one from the Mobile Carriers Forum and one from Telstra. There was no community submissions or attendance at the information sessions.

The two submissions received were similar in the issues raised and it is encouraging that they both sought to engage with Council on this Policy Framework and acknowledged that they would work within it.

Concerns were raised over the Policy Framework being more stringent than the requirements in Clause 52.19 of the Melton Planning Scheme and those contained within the VIC Code. They also raised concerns that pre-consultation requirements were contrary to Section 52, 64 and 81 of the Planning and Environment Act. It is recommended that the Policy Framework is reviewed again in context of consistency with these requirements within the legislation and where necessary sections of the Policy Framework are clarified and further explanation provided to ensure clarity that the Policy Framework is consistent with the provisions within Melton Planning Scheme, The Vic Code and the requirements of the Act.

A full list of recommendations for consideration by Council to incorporate into the final Policy Framework document are listed below:

**Table 2 - Recommendations for the Policy Framework**

<b>Recommendation</b>	<b>Section of Policy Framework</b>
It is recommended that this section is clarified though more explicit guidance and principles of siting and design requirements.	3.1.6
Photomontages not to be limited by a minimum number but decided on a site-by-site basis.	3
Provide definition of what determines nearby (any site within 500 metres).	3
Recommend that any planning permit shall be conditioned to require the applicant to reinstate or repair any damage to Council's assets because of the development works to the satisfaction of Council.	3
Recommended that Policy Framework is updated in this section to provide written examples what would be accepted by Council as evidence that communications infrastructure will not impact upon airport operations.	3.1.4
Recommend inclusion into Policy Framework circumstances where Visual Impact Assessment is and is not required as part of submission requirements. Clarification on photomontage production and how numbers and period of viewers are obtained for the VIA should also be detailed in the Policy Framework to provide further clarity on this matter.	4
Council reserve the right to provide a condition for pre- and post-installation EME testing where community has concerns over this issue to provide them reassurance and clarity over this issue.	4

Clarification on how forums will work for Council, carriers, developers and the VPA to work together on communications solutions within PSPs.	4.4.1
Recommend that this request for site plans as a minimum requirement for pre-application discussions is amended to allow for early discussions with Council prior to a formal site being progressed by Telstra or any other carrier and therefore providing Council more input into the site selection process.	4.1
Recommend that "dot point 4" is amended to include reference to Deployment Code 4.1 document and that if this document is submitted with a planning permit, then this may fulfil this submission requirement. However, it recommended that a guide distance of 500 metres for consideration is retained.	4.2
The complaints section is broken into two parts, one for facilities that do not require Council approval and one for facilities that do require Council approval.	Section 6
Recommended that at the next carrier forum, further discussion between carriers and Council should happen to refine the guidance in the appendices.	Appendix B and C



# DISCLAIMER

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.





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