

## Summary of Submissions

Community Concerns	Applicants Response	Assessment Officer's Response
First Notification Period		
<p>Environment Factors involving radio waves: animals and native vegetation such as trees would be impacted by the proposed development.</p>	<p>Refer to comments below.</p>	<p>Refer to comments below.</p>
<p>Health Risks: Concerns are raised to health risks by new mobile phone towers being rolled out in residential areas, specifically with electromagnetic field of a power pole can reach up to 500 metres.</p>	<p>All mobile phone carriers, must strictly adhere to Commonwealth Legislation and regulations regarding mobile phone facilities and equipment administered by the Australian Communications and Media Authority (ACMA).</p> <p>In 2020 the ACMA adopted a technical standard for exposure of the general public to RF EME from mobile base stations. The standard, known as the 'Standard for Limiting Exposure to Radiofrequency Fields – 100kHz to 300GHz (2021) RPS S-1 (Rev 1)', was prepared by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and is the same as that recommended by ICNIRP (International Commission for NonIonising Radiation Protection), an agency associated with the World Health Organisation (WHO). Mobile carriers must comply with the Australian Standard on exposure to EME set by the ACMA.</p> <p>The Standard operates by placing a limit on the strength of the signal (or RF EME) that Carriers can transmit to and from any network base station. The general public health standard is not based on distance limitations, or the creation of "buffer zones". The environmental standard restricts the signal strength to a level low enough to protect everyone, always, including children. It has a significant safety margin, or precautionary approach, built into it.</p> <p>All Carriers rely on the expert advice of national and international health authorities such as the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organisation (WHO) for overall assessments of health and safety impacts.</p> <p>The WHO advises that all expert reviews on the health effects of exposure to radiofrequency fields have concluded that no adverse health effects have been established from exposure to radiofrequency fields at levels below the international safety guidelines that have been adopted in Australia.</p>	<p>Council concurs that the health risks are managed and monitored by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organisation (WHO).</p> <p>As such a condition would be included on the consent requesting that an Environmental Electromagnetic Energy (EME) Report, as required by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA), be undertaken and submitted to Council for approval prior to the issue of the Occupation Certificate.</p> <p>The Environmental EME is to be maintained for the duration of the development and is to be reviewed annually. Any changes to the report is to be submitted to Council for assessment.</p>

	<p>Carriers have strict procedures in place to ensure their mobile phone base stations comply with these guidelines.</p>	
<p>Location of the development being within proximity to residential dwellings and visual impacts.</p>	<p>Due to the residential area to the north of the proposed site location, most views of the facility will be from the north/north-east. When viewed from the residential area, the upper portion of the proposed facility will be visible from a number of vantage points.</p> <p>The following images show that the proposed facility will be seen in conjunction with other elements in the environment, including the built form of the residential area, the industrial area further south, and vertical elements such as power poles and power lines and mature vegetation. When viewed from around 400m north-west, on Coerwull Road, the proposed facility will be entirely screened due to the mature vegetation that is in the vicinity and lining the roadway.</p>  <p>View towards the proposed site location from Coerwull Road.</p> <p>The proposed facility will benefit from mature vegetation, and will also be seen in conjunction with other vertical elements including power lines and power poles.</p>	<p>The proposed site location is approximately 150m off Coerwull Road, and accessed via the existing driveway on the property.</p> <p>The property contains a self-storage facility, with numerous garages and lockers available for public use. The property has a railway line to the south, that is predicted to assist in minimising the perceived visual impact of the facility to the surrounding area.</p> <p>It is considered that there will be visual impact from the proposed facility, however it is limited, and intermittent in nature in the surrounding area.</p> <p>The existing infrastructure and vegetation on the subject property and surrounds, is expected to screen the lower portion of the monopole and the ground based equipment. The upper most portion of the monopole and headframe will be visible from some locations surrounding the property.</p> <p>The proposed facility will be seen in conjunction with other elements in the environment, such as power poles, power lines and vegetation.</p> <p>The most visual points are from residential dwellings around Fullagar Avenue (and side streets) and the Caravan Park located adjacent to the property on Coerwull Road. Given the existing vegetation along Coerwull Road, there is expected to be no further potential impacts to the north-west.</p> <p>The development being a slimline monopole structure will be the only infrastructure viewed from residents in Fullagar Avenue.</p> <p>Besides the height of the development, ground base equipment will be similarly designed to the existing storage units on site.</p>



View towards the proposed site location from Fullagar Avenue.

Views of the proposed facility from the south are predominately limited due to the distance separation from the site location, and the existing industrial uses between the site and the southern residential area. It is also noted that the Great Western Highway is located approximately 300m to the south of the proposed site location, and provides a further buffer for residential areas to the south.



View towards the proposed site location from Coerwull Road, approximately 3500m south.

The below image is taken from a nearby tourist accommodation. While it is clear that this vantage point will have clear vision of the proposal, it is not considered an inappropriate or uncommon site for such a location, and combines the existing commercial storage use with an additional infrastructure use. Further, the facility will be seen in conjunction with other vertical elements in the environment, and will not detract from any significant views of vistas.



View towards the proposed site location from Coerwull Road, adjacent to site location.

The above images show that while the proposed telecommunications facility may be visible at some vantage points, primarily when there is direct vision, the use of a slimline monopole structure, along with the specific siting and design, will enable it to be minimised as much as is possible.

The proposed structure is considered a visually acceptable outcome taking into account the inherent nature of telecommunications facilities needing to be sited in the centre of the area which they are required to service, and requiring line of sight to the areas which they are proposed to cover. Further, the siting of the proposed facility in an area with existing vegetation in the near vicinity, near a railway corridor and industrial area, ensures that the visual impact is ameliorated as much as is possible.

Through our experience, the best visual outcome is to retain the proposed monopole's 'grey' appearance, as it recedes into the background in most settings.

Devalue of properties.

In regard to property values, it is often considered a necessity of new purchasers of a property that there is an efficient and reliable mobile telecommunications service available throughout the local area. Mobile

The devaluation of properties is not a planning consideration.

	telecommunications facilities are becoming increasingly common in areas where coverage improvements are necessary. Like accessibility to schools, shops and public transport, mobile telecommunications coverage is just one of the essential services that residents expect, however it is understood that each of these aspects of a property may influence individual buyers.	
<b>Second Notification Period</b>		
Impacts to the caravan park on the adjoining property.	It is understood that there will be some visual impact from the proposal when viewed from some areas within the adjoining Lithgow Tourist Park. However, as a primarily transient, tourist population, it is not considered that the impacts will be negative. As with residents and local communities, tourist populations expect an efficient mobile telecommunications network while holidaying and undertaking recreational ventures. It is not considered an uncommon site location for a mobile telecommunications facility to be in proximity to such an operation. It is also noted that the caravan park, and along Coerwull Road, is provided a degree of visual screening by the existing vegetation that lines the roadway.	Refer to previous comments relating to visual impacts and the design of the development.
Visual impacts and character of the area.	<p>While the proposed telecommunications facility may be visible at some vantage points, primarily when there is direct vision, the use of a slimline monopole structure, along with the specific siting and design, will enable it to be minimised as much as is possible. The proposed structure is considered a visually acceptable outcome taking into account the inherent nature of telecommunications facilities needing to be sited in the centre of the area which they are required to service, and requiring line of sight to the areas which they are proposed to cover. Further, the siting of the proposed facility in an area with existing vegetation in the near vicinity, near a railway corridor and industrial area, ensures that the visual impact is ameliorated as much as is possible.</p> <p>From more distant vantage points, the proposed facility will have the backdrop of vegetation, and will be seen in conjunction with other existing vertical elements in the adjoining commercial and industrial areas. From a distance, it is not expected that the monopole will be a focal point in the area, nor detract from the general character of the immediate vicinity or wider area.</p> <p>Through our experience, the best visual outcome is to retain the proposed monopole's 'grey' appearance, as it recedes into the background in most settings. If Council considers that an alternative colour would be better suited in this instance, it could be accepted as a condition of any potential Approval.</p>	Refer to previous comments.
Overshadowing impacts	Due to the relatively minor bulk of the facility, and its slim appearance, it is not expected that shadowing	The monopole is relatively slim, with the location of the tower containing

	<p>will be a significant issue in the surrounding area. The facility will also be within other existing vertical elements such as power poles and power lines, and vegetation in the surrounding area.</p>	<p>large setbacks from any residential boundaries. Therefore, the tower is not expected to have overshadowing impacts.</p>
<p>The development is located within proximity to heritage items and cultural significant areas. The impacts to these items will be impacted upon.</p>	<p>While there are heritage items in the vicinity, there are none immediately adjoining, and they will not be impacted upon. There are no other known items of cultural, historical or environmental heritage significance located in the immediate vicinity of the proposed site that will be impacted upon by this proposal.</p>	<p>There are some heritage items located in the vicinity of the development, these are known as Methven House, Andrew Brown Cemetery, Bowenfels Railway Station, Lithgow Station Group and Residence, Stone Viaduct.</p> <p>These heritage items do not adjoin directly to the development, the storage unit will be screened via surrounding structures with the pole and antennas being located above the roofline of surrounding dwellings and storage units.</p> <p>In relation to cultural significant items, an Aboriginal Heritage Information Management System (AHIMS) web services search was undertaken and did not identify any aboriginal sites or places of significance to be located within the vicinity of the development.</p> <div data-bbox="1129 1249 1551 1827" data-label="Image"> <p>The map shows a street grid in a residential area. A yellow-shaded area in the bottom-left corner is labeled 'Andrew Brown Private Cemetery'. A larger orange-shaded area in the top-right is labeled 'Methven House'. A smaller orange-shaded area in the bottom-right is labeled 'Bowenfels Railway Station, Lithgow Station Group and Residence, Stone Viaduct'. A yellow-shaded area in the top-left is labeled 'Location of the Proposed Development'. The map also shows 'LITHGOW' and 'BOWENFELS' streets.</p> </div>
<p>The new location of the development will be closer to power lines.</p>	<p>The proposed (revised) site location is afforded a greater level of separation to nearby power lines than the original proposal. The separation is considered acceptable and will not pose any concerns for the ongoing operation of the facility or the local power supply.</p>	<p>The application was referred to Endeavour Energy who had no objection to the application.</p>

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Over-development of the site; the use of the site is already utilised for storage units and associated infrastructure such as the bioretention basin, fencing, landscaping, driveway and carparking areas.

The proposal is not considered to be over-development of the site. The proposal is sited in an area that is currently not utilised, and will not impact the existing (or future) uses of the site. The facility is proposed to be sited on a property that is operating an existing commercial use, and is considered an appropriate location that will not inhibit the use of the subject property, nor properties in the surrounding area.  
The facility has been specifically designed so that it will not impact upon the operation of the water retention basin.

The use of the site is currently utilised by an existing commercial use being for storage units and associated development.

The lease area of the facility is proposed to contain an area of 164.8 m<sup>2</sup> (10.3m x 16m) over an allotment that contains an area of 8050m<sup>2</sup>.

The area of the structure is considered to be relatively small compared to the area size of the property and the existing use on the site. The existing use further contains reasonable vehicle manoeuvring areas and setback from boundaries.

All commercial developments that involve new storage units are required to be assessed by WaterNSW. Given that the development is proposed to be located within proximity to the detention basin, the development was referred to WaterNSW as per the State Environmental Planning Policy (Biodiversity and Conservation) 2021.

The on-site detention basin is noted to be approximately 400m<sup>2</sup> area and discharge to Coerwull Road to the west via a 150mm outlet.

As such WaterNSW is satisfied that the proposed development will not impact the existing stormwater infrastructure on the property subject to conditions on the consent.

Medical and Health Concerns – scientific studies have proven that telecommunication towers being located within proximity to residential uses increase and have detrimental health impacts.

The following is a brief outline of the guidelines surrounding health and safety of mobile telecommunications infrastructure.

“All mobile phone Carriers must strictly adhere to Commonwealth Legislation and regulations regarding mobile phone facilities and equipment administered by the Australian Communications and Media Authority (ACMA).”

In 2020 the ACMA adopted a technical standard for exposure of the general public to RF EME from mobile base stations. The standard, known as the *Standard for Limiting Exposure to Radiofrequency Fields* –

Council concurs that the health risks are managed and monitored by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organisation (WHO).

As such a condition would be included on the consent requesting that an Environmental Electromagnetic Energy (EME) Report, as required by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA),

	<p><i>100kHz to 300GHz (2021) RPS S-1 (Rev 1)</i>, was prepared by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and is the same as that recommended by ICNIRP (International Commission for Non-Ionising Radiation Protection), an agency associated with the World Health Organisation (WHO). Mobile carriers must comply with the Australian Standard on exposure to EME set by the ACMA. The Standard operates by placing a limit on the strength of the signal (or RF EME) that Carriers can transmit to and from any network base station. The general public health standard is not based on distance limitations, or the creation of "buffer zones". The environmental standard restricts the signal strength to a level low enough to protect everyone, always. It has a significant safety margin, or precautionary approach, built into it. It is with this in mind that we find mobile telecommunications base stations being common-place in residential areas, often located on rooftops of buildings, apartment blocks, and on numerous Hospital buildings and within school grounds across the country. Scientific research has also shown that EME from telecommunications doesn't cause animals harm either.</p> <p>Carriers rely on the expert advice of national and international health authorities such as the ARPANSA and the World Health Organisation for overall assessments of health and safety impacts. The WHO advises that all expert reviews on the health effects of exposure to radiofrequency fields have concluded that no adverse health effects have been established from exposure to radiofrequency fields at levels below the international safety guidelines that have been adopted in Australia.</p> <p>ICNIRP's current international guidelines are applicable to 5G frequencies. ICNIRP's exposure guidelines cover frequencies from 100 kHz – 300 GHz. There are also international standards for the compliance assessment of 5G networks antennas and devices, which include new approaches for smart antennas and the use of new frequency ranges. Mobile phone base station facilities do not cause interference in the surrounding area. There are National and International standards governing all forms of electronic equipment regarding the interference that such equipment produces and, in turn, its immunity to interference from outside. Any equipment compliant with these standards is unlikely to suffer or cause interference. It is confirmed that all equipment connected to a mobile telecommunications base station is compliant with these standards.</p>	<p>be undertaken and submitted to Council for approval prior to the issue of the Occupation Certificate.</p> <p>The Environmental EME is to be maintained for the duration of the development and is to be reviewed annually. Any changes to the report is to be submitted to Council for assessment.</p>
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	<p>Further, all transmitters are designed to comply with ACMA regulations which minimise spurious interference to other services; sufficient antenna separation is maintained; and, detailed radio frequency modelling is performed to ensure that interference into other services is avoided.</p>	
<p>Environmental Concerns such as flood impacts. Currently, this section adjacent to the site within Coerwull Road is subject to flooding and this causes a safety impact to residents. The development would increase the volume of water from the site to divert to the road at a faster rate.</p>	<p>The proposal would not increase any impacts related to flooding in the local area. The facility has been specifically designed to take into consideration the adjoining water retention basin, with detailed modelling undertaken to ensure there will be no impact on the retention or release of water in the area. The proposed facility will not increase the probability or severity of a flood event in the local area, rather, it would provide assistance in natural disasters such as flood or bushfire, by providing critical emergency service communication.</p>	<p>The size area (not height) of the development on ground level is not expected to increase potential flood impacts in the area. As previously discussed the development will not impact the existing detention basin. WaterNSW has also provided concurrence to the application.</p>
<p>Location of the development is unsuitable for the locality, given the reasons raised through the residential submissions and specifically within a bioretention basin that is to contain vegetation and to capture stormwater runoff.</p>	<p>As has been detailed, the proposed site location has been specifically chosen on the subject property as it will not impact the existing or future use of the property or surrounding properties, and has been designed to take into consideration the water retention basin nearby.</p> <p>The proposed facility intends to provide improved mobile telecommunications services and connectivity to users in the surrounding area. The predominant users of these services are residential areas, and while it is accepted that the facility is in proximity to a residential population, it is afforded as much distance separation as is possible in this instance.</p> <p>Siting a facility in close proximity to the area it is intended to cover ensures that the facility operates at its lowest possible power levels and provides optimum service to the end user. Siting a facility further away from the areas requiring coverage improvements can often result in the need for numerous additional facilities to provide efficient coverage.</p> <p>The lack of telecommunications infrastructure in the local area is putting a major strain on the existing Carrier networks in the surrounding area. This lack of infrastructure becomes even more crucial with the introduction of 5G technology, whereby facilities need to be located closer to each other than for previous 3G and 4G Networks.</p> <p>The proposed site location offers the necessary height, whilst importantly being central to the area where Carriers require coverage improvements. The</p>	<p>Refer to previous comments.</p>

	<p>site location is immediately abutting an existing commercial use, in the storage warehouse, and the existence of mature vegetation adjoining the site location will also assist in reducing the visual impact of the facility to the nearby residential areas. Candidate options were limited due to the requirements for a site on an elevated parcel of land that would meet coverage requirements, and that would not impede the existing and future use of land. The proposed site location has attempted to strike a balance between all factors in the environment.</p> <p>The site is afforded a level of screening from vegetation on adjoining properties, and is distanced by some 55m from the nearest residential property. The ground based equipment will be painted a shade of green to blend with adjoining vegetation and the retention basin, and while the monopole and headframe will be seen to the nearby and surrounding areas, its impact will be minimised by siting nearby to the railway line and other industrial uses to the south.</p>	
<p>Heritage and cultural values of the area.</p>	<p>The proposed site location is not in the immediate vicinity, or adjacent to, any listed heritage items or conservation areas. Lithgow is an historically diverse town, with numerous heritage items throughout, however this proposal has attempted to avoid these significant areas and ensure there is as little impact, if any, on the heritage of the town.</p> <p>While the proposed telecommunications facility may be visible at some vantage points, primarily when there is direct vision, the use of a slimline monopole structure, along with the specific siting and design, will enable it to be minimised as much as is possible. The proposed structure is considered a visually acceptable outcome taking into account the inherent nature of telecommunications facilities needing to be sited in the centre of the area which they are required to service, and requiring line of sight to the areas which they are proposed to cover.</p>	<p>Refer to previous comments relating to the submissions.</p>
<p>The purpose of the development; as the document states that it "has identified an area of poor network coverage in the Lithgow area". The residents advised that they currently have NBN Node and the mobile data is more than adequate for the residential area of Fullagar Avenue and Caravan Park.</p>	<p>It is understood that the NBN provides fixed internet services to specific residences in the area. The NBN does not, however, provide mobile telecommunications services. These mobile services are required for phone and emergency situations, and in instances where fixed line communications are unavailable or inoperable. Mobile telecommunications services are also important to transient populations, whether that is tourists travelling along local roadways, tourists in the local area – such as residing at the nearby tourist caravan park, or residents travelling in motor vehicles, or simply standing outside in their backyards while using mobile devices. While some residents and members of the surrounding area may receive some mobile telecommunications services, there is a noted</p>	<p>Infrastructure is to be constructed as new technology is developed. Services currently may be satisfactory however as technology is developed, the services would no longer be available. Mobile telecommunication services are important specifically to blackspot areas.</p>

<p>Additionally, there would be no residential expansion in the area given the constraints of the surrounding land.</p>	<p>deficiency in the area, whereby the availability of the most up-to-date technologies are not available. There are also a number of Blackspot areas that have been noted throughout the Federal Governments Mobile Black Spot Program. This dedicated mobile telecommunications facility will ensure efficient mobile services are provided into the surrounding area, which not only includes the residential area, but also the tourist locations, and surrounding roadways.</p>	
<p>Documentation provided does not represent a true replica of the location of the caravan park</p>	<p>Where referenced in documentation, it is not considered that the location of the caravan park has been mis-represented.</p>	<p>Refer to previous comments relating to visual impacts.</p>