PLANNING ASSESSMENT REPORT

Planning Permit Application for a Telecommunications Facility

Lot 12951 DP137522

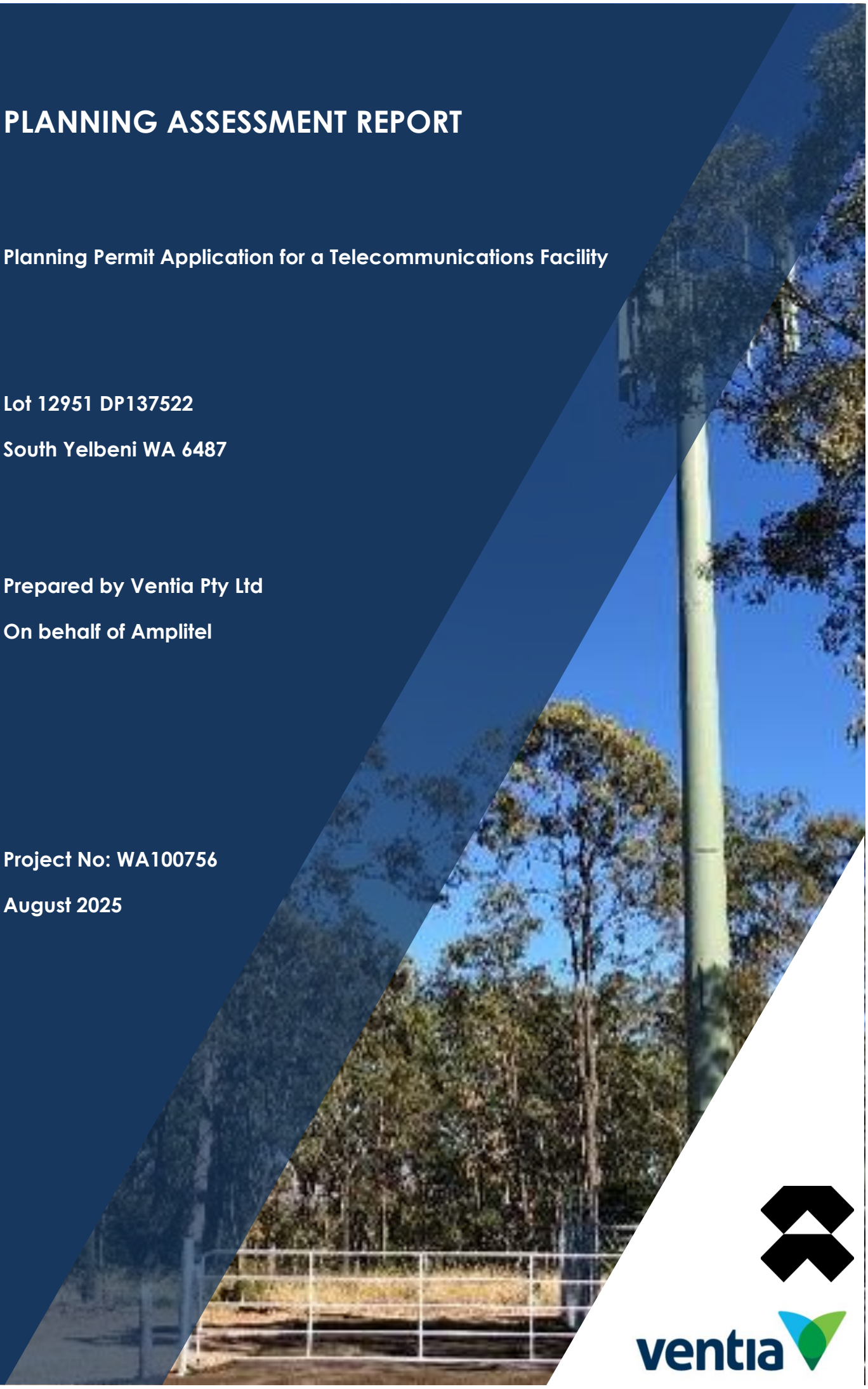
South Yelbeni WA 6487

Prepared by Ventia Pty Ltd

On behalf of Amplitel

Project No: WA100756

August 2025



CONTENTS

Document Quality Control

This Planning Assessment Report is prepared by:

Ventia Pty Ltd

ABN 51 603 146 676

Postal Address:

Level 1, 10 Browning Street

West End QLD 4101

M (02) 8248 6496

W www.ventia.com

Document Control				
Rev	Date	Status	Prepared by	Reviewed by
0.1	26/06/2025	Draft	LD	CN
1	01/08/2024	Final	LD	CN

Disclaimer:

Ventia Pty Ltd does not accept any risk or responsibility for a third party using this document, unless written authorisation is provided by Ventia Pty Ltd.

1.0 EXECUTIVE SUMMARY

1.1 Site and Proposal Details

Address of Site	No address.
Legal Property Description	Lot 12951 DP137522
Coordinates	-31.167298, 117.66558
Site Area	153.91 hectares
Registered Owner	BIGTREES NOMINEES PTY LTD
Local Authority	Shire of Trayning
Proposal	40m high monopole tower, six (6) panel antennas on a triangular headframe, one (1) equipment shelter not more than 3m high with a base area of not more than 7.5m² at the base of the tower and ancillary equipment.
Planning Instrument	Shire of Trayning Local Planning Scheme No. 1
Zone	Rural
Overlays	Bushfire Prone Area
Application seeking	Development permit for a Telecommunications Facility
Use definition	Telecommunications Infrastructure

1.2 Applicant Details

Applicant	Amplitel C/- Ventia Australia Pty Ltd
Contact Person	Lia Drivas (02) 8248 6496 Lia.drivas@ventia.com
Our Reference	WA100756 Yelbeni

2.0 INTRODUCTION

This report has been prepared by Ventia on behalf of Amplitel as supporting information to a Planning Permit Application for the works and use of a Telecommunications Facility on land at Lot 12951, DP137522 South Yelbeni WA 6487.

Amplitel, a company part of the Telstra Group is currently undertaking work across Australia to support and expand the new mobile phone infrastructure and coverage for Telstra and other carriers to improve customer experience through faster and more reliable voice and data services.

This project forms part of a wider government funded mobile blackspot program where several areas across Australia, particularly more regional and remote areas have been designated as higher priority areas for improved mobile coverage. Yelbeni has been identified as being in critical need for the delivery of such services.

Due to an industry-specific network requirement, Amplitel have identified the need to install a telecommunications facility on the site to improve both voice and data services within the surrounding area. Furthermore, the facility will provide 4G and 5G services to the surrounding Yelbeni area.

All mobile phone network operators are bound by the operational provisions of the federal *Telecommunications Act 1997 ("The Act")* and the *Telecommunications Code of Practice 2018*. The proposed telecommunications facility installation is not defined as a low-impact facility and is therefore subject to relevant State and local planning provisions.

An extensive site selection process has been completed prior to selecting the subject site as the nominated candidate for a new Telecommunications Facility. This site selection process included considering a variety of factors including planning scheme considerations technical and coverage objectives, cost considerations, land tenure, visual impact and engineering/design criteria. The site was selected as the most appropriate location based on the above considerations, which are outlined in **Section 7** of the report.

The proposal is subject to the provisions of the WA *Planning and Development Act 2005* and the provisions of the *Shire of Trayning Local Planning Scheme No. 1*.

3.0 PROPOSED SCOPE OF WORKS

The proposal is inclusive of the following scope of works:

- Installation of one (1) new 40m high monopole;
- Installation of one (1) new triangular headframe;
- Installation of Six (6) new panel antennas (no greater than 2.8m in length);
- Installation of one (1) Telstra Equipment Shelter that is not more than 3m high with a base area of not more than 7.5m² at the base of the aforementioned tower;
- Installation of associated ancillary cabling and equipment; And
- Existing Telstra compound fencing to be upgraded.

Refer to Plans attached in **Appendix A** for further details and **Appendix B** for Land Titles.

All mobile phone network operators are bound by the operational provisions of the Federal *Telecommunications Act 1997* (the "Act") and the *Telecommunications Code of Practice 1997*. The proposed telecommunications facility installation **is not defined as a low-impact facility** and is therefore subject to relevant State and local planning provisions.

Pursuant to the *Planning and Development Act 2005* (**PDA**), the proposal constitutes a change of use and requires a development application to be made to Shire of Trayning (**Council**) for approval.

The proposal is subject to the *Shire of Trayning Local Planning Scheme No. 1* (the **local planning scheme**). The proposal has addressed the applicable provisions of the planning scheme in **Section 12** of this report.

Under the planning scheme, the proposed scope of works meet closest the definition for 'service utility' and the site is 'Public purposes' zoned and subject to a bushfire prone area overlay. As such, the use will not be permitted unless Council has exercised its discretion by granting development approval.

This Planning Assessment Report demonstrates compliance of the proposal against the local planning scheme and the applicable overlay provisions.

Based on the above, the proposed application to install a Telecommunications Facility at Lot 1 King Street, Yelbeni is considered appropriate for the site and warrants favourable consideration by Council.

4.0 PURPOSE OF THE PROPOSAL

To cater for the growing demand for mobile services, Telstra has embarked on a nationwide rollout to deliver an improved, reliable telecommunications network to the Australian public. The rollout will provide improved mobile coverage and enhanced services in metropolitan, regional and rural areas throughout Australia. This rollout consists of the upgrade of existing telecommunications facilities and where required the installation of new mobile base stations to expand the coverage footprint and offer seamless mobile services.

Additional base stations are required where surrounding facilities cannot provide sufficient coverage to a target area. New facilities are also required when existing base stations are fully utilised and cannot serve additional users in the area. Amplitel and Telstra have undertaken analysis of the Telstra mobile network in Yelbeni and have identified areas where coverage and network quality needs to be improved. These include the townsite areas and adjacent lands, as well as future developed parcels to the south. If this investment is not made, the following main issues will arise:

1. Users may have difficulty connecting to the mobile network or the call may drop out. This impacts businesses, residents, visitors to the area and the ability of the user to contact emergency services.
2. Users may experience reduced data speeds, longer download times and poor network performance at busy times of the day with data intensive and time sensitive applications (e.g. newscasts, social media, mobile banking, weather forecasts, sports highlights etc).

As noted above, the lack of telecommunications facilities in Yelbeni does not only deprive existing users of signal, but also puts at risk the availability of 21st century services to facilitate residential expansion and growth.

Once a need for improved network performance has been identified, the optimisation of existing facilities throughout the region is explored and undertaken where required. In some cases this option resolves network deficiencies in an area. However, in this situation the optimisation of surrounding facilities has not been able to achieve a satisfactory outcome for the network in Yelbeni. Further investigations into the use of other Carrier and broadcast facilities within the area have also been completed. This is discussed in the Site Selection Process of this report.

5.0 THE NEED FOR THE PROPOSAL

Access to wireless services is a critical requirement in the modern era. While Australia has among the fastest mobile networks speeds across the globe, there is an identified coverage disparity between urban and rural areas. This disparity is due to the population concentration in urban areas, with existing wireless services covering 99% of the population but only 33% of the total landmass. As a result, major transport routes and large landholdings miss out on the critical wireless services available in urban areas.

While satellite services for mobile phone and data are available in some rural areas, the steep cost for landholders, unreliability and low data caps are all significant impediments to their daily use.

The 2018 Regional Telecommunications Review (the **Edwards Review**) brought these issues into clear focus, with important findings relating to:

- economic benefits; and
- social benefits

The Edwards Review found that economic benefits in regional areas are increasingly linked to wireless services, with regional businesses in a weak position to take advantage of new digital applications and economic opportunities. The Australian Government Response to the review strengthened this argument, stating that "*digital agriculture could increase the gross value of Australian agricultural production by $20.3 billion, a 25% increase over 2014-15 levels. The greatest gains are expected to come from remote monitoring, automation, better tailoring of inputs such as fertiliser and seed, and environmental benefits such as efficiencies in water and pest management*".

Tourism is often touted as a key asset to Australia as a whole, with the emerging areas of agri-tourism and eco-tourism combining with the rich and unique history and experiences available in outback areas to provide new economic opportunities for regional areas. Connectivity is a driver of such economic opportunities, even in rural areas. Data from Tourism Australia shows that 289 million visitor nights were spent in regional Australia in 2017, up from 234 million in 2012. The Edwards Report includes first-hand examples from regional tourism operators on the challenges they have faced and how technologies have or could improve their businesses.

The education opportunities in regional areas of Australia have lagged behind those in urban areas for several decades (Karmel. 1973 and Lamb et al. 2014). The need to send children and young adults to cities to obtain the education available in urban areas was long seen as a necessity. The advent of digital education services has proven a boon in ensuring that families in

regional areas can stay together while still receiving a high-quality education. Irrespective of students being educated via distance or at local schools, education is increasingly digital. With video being a key component of lessons, access to wireless services is essential.

Social cohesion and connectivity are another important aspect of the digital age. Expanded wireless services allow for regional and rural communities more options to communicate with each other and with relatives and/or friends in other cities and countries. Additionally, rural and remote communities are less likely to have access to a range of health care services (Rural Health Standing Committee, 2016: National Strategic Framework for Rural and Remote Health). Given the natural hazards such as drought, bushfires and floods that are a frequent and ongoing occurrence in Australia, access to mental health services can be of critical importance. Wireless services allow for more communications opportunities in regional areas and opens additional avenues for mental health services (National Mental Health Commission, 2018).

Wireless services are also important for safety reasons, particularly in relation to the aforementioned natural hazards present in Australia. The 2017-2018 ACMA Communications Report showed that in 2017-2018 there were nine (9) million calls made to emergency services numbers, and increase of 4.8 per cent from 2016-2017, with the majority made from mobile phones. This increase in emergency numbers calls from mobile phones is a continuing trend, with the share increase by approximately 2-3% on average every year from 2012-2014. In regional and remote communities, where potentially dangerous tasks are undertaken on a daily basis, but where neighbours or family members are oftentimes out of earshot, the ability to call for assistance from a mobile phone can be critical.

The proposal is an important aspect of bridging the digital disparity between denser urban area and regional communities, and in doing so better supporting their communities in a range of areas, including economic, education, social and safety.

6.0 MOBILE TELECOMMUNICATIONS NETWORKS

A mobile telecommunications network is made up of multiple base stations covering a geographic area. They work by sending and receiving radio signals from their antennas to mobile phones and other mobile devices such as tablet computers, wireless dongles etc. Base stations are designed to provide service to the area immediately surrounding the base station which can be up to several kilometers in distance. Depending on the technical objectives of a base station, the physical characteristics of each telecommunications facility; such as its height, number and size of antennas, equipment, cabling etc. will vary.

As a general rule, the higher the antennas of a base station the greater the range of coverage and the ability to relieve capacity issues. If this height is compromised then additional facilities, and thus more infrastructure, will be required for any given locality. The further a facility is located away from its technically optimum position the greater the compromise of the service. This may result in coverage gaps and require additional or taller base stations to provide adequate service.

Each base station transmits and receives signals to and from mobile devices in the area. As the mobile device users move around their devices will communicate with the nearest base station facility to them at all times. If the users cannot pick up a signal, or the nearest base station is congested because it is already handling the maximum number of phone calls or maximum level of data usage, then the users may not be able to place a call, they may experience call "drop outs" or they might experience a slow data rate while attempting to download content.

There are three main factors that can cause the above:

- You may be too far away from a facility to receive a signal, or there may be objects blocking the signal from the nearest facility; such as hills and large trees. To ensure optimum service the radio signals transmitted between the facility's antennas and mobile devices need to be unimpeded, maintaining a "line-of-sight" between them.
- The facility may be transmitting as much data and calls as it can handle. This can result in call drop-outs and slower data rates when too many users are connected to a facility at once.
- The depth of coverage, which affects the ability to make calls inside buildings, may be insufficient in some local areas.

The current proposal will form part of Telstra's 4G and 5G network solution to the Yelbeni locality and will deliver essential mobile services (voice calling, SMS), as well as live video calling, video-based content including; news, finance and sports highlights, and high-speed wireless internet – wireless broadband. With a coverage footprint of more than 2.1 million square kilometers and covering more than 99% of the Australian population. Telstra's 4GX is Australia's largest and fastest national mobile broadband network and as such requires more network facilities, located closer together to ensure a high-quality signal strength to achieve reliable service and the fastest possible data transfer rates.

7.0 SITE SELECTION PROCESS

Amplitel commences the site selection process with a search of potential sites that meet the network's technical requirements, with a view to also having the least possible impact on the amenity of the surrounding locality. Amplitel applies and evaluates a range of criteria as part of this site selection process.

Telstra and Amplitel assess the technical viability of potential sites through the use of computer modelling tools that produce predictions of the coverage that may be expected from these sites as well as from the experience and knowledge of the radio engineers.

There are also a number of other important criteria that Telstra uses to assess options and select sites that may be suitable for a proposed new facility. These take into account factors other than the technical performance of the site, and include:

- The potential to co-locate on an existing telecommunications facility.
- The potential to locate on an existing building or structure.
- Visual impact and the potential to obtain relevant town planning approvals.
- Proximity to community sensitive locations and areas of environmental heritage.
- The potential to obtain tenure at the site.
- The cost of developing the site and the provision of utilities (power, access to the facility and transmission links).

In making the proposal for this site at Yelbeni, Amplitel has carefully weighed all of the aforementioned criteria. This analysis is detailed in the next section.

8.0 CANDIDATE SITES

Amplitel carefully examined a range of possible deployment options in the area before concluding that a new mobile base station at Lot 12951 DP137522, South Yelbeni WA 6487 would be the most appropriate solution to provide necessary mobile phone coverage to the Yelbeni locality.

Accordingly, this section of the report will demonstrate the following:

- Colocation opportunities and existing telecommunications infrastructure within proximity to the proposed installation; and
- An analysis of the locations considered when determining an appropriate location for a new telecommunications installation within the required coverage area.

8.1 Colocation opportunities

The Communications Alliance Ltd. (formerly Australian Communications Industry Forum Ltd. - ACIF) Industry Code C564:2020 – Mobile Phone Base Station Deployment promotes the use of existing sites in order to mitigate the effects of facilities on the landscape. It should also be noted that as a first preference, Amplitel attempts to utilise, where possible, any existing infrastructure or co-location opportunities. Co-location is the beneficial reuse of an existing tall structure to negate a need for a new tower in the area, with antennas and equipment being placed on the existing tall structure and the immediate ground area. Co-locations will commonly include an existing Telecommunications Facility, but can include tall residential buildings, radio towers, or government assets such as water tanks.

Figure 1 shows all existing tall infrastructure and existing and proposed telecommunications facilities surrounding within the surrounding area.

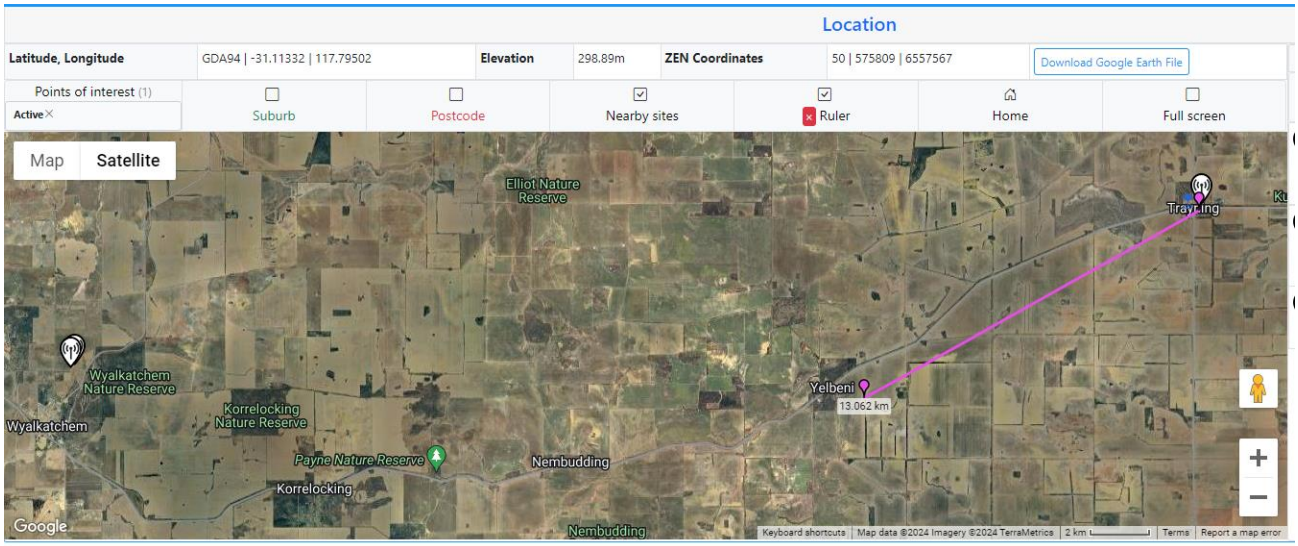


Figure 1: Location of candidates for co-location *Source: www.rfnsa.com.au*

The characteristics of the co-location candidates identified in **Figure 1** are provided below in **Table 1**.

Table 1: Summary of co-location opportunities within the Yelbeni area

RFNSA Site No.	Site Address	Structure type	Is site constructed?	Suitable for co-location?	Comments
6488001	Trayning Station Railway Reserve, Sutherland Street, Trayning WA 6488	Elevator Tower	Yes	No	The nearest tower to Yelbeni is approximately 13KM away from Yelbeni town centre in Trayning and has existing Telstra antenna's already on it. It is not able to provide adequate 4G/5G coverage to Yelbeni centre and surrounds targeted area with an upgrade.

As indicated in **Figure 1**, the closest existing telecommunications facility is located at Trayning Station Railway Reserve, Sutherland Street, Trayning WA 6488 (RFNSA 6488001) which is over 13KM from the approximate centre of the targeted coverage area. As this facility is unable to provide coverage to the targeted coverage area, it was not considered a feasible co-location option. There are no suitable tall structures in or near Yelbeni which could also feasibly support a rooftop co-location also.

8.2 Candidates considered

The site selected is deemed to be the most optimal location to achieve the required coverage for the targeted coverage area and requires the installation of a new mobile base station. Alternative candidates were considered, though the rural residential areas, rail and road reserves near the candidates were excluded due to issues with amenity, land size and existing use conflicts. The target coverage area was identified as largely compromising the rural lots North of Worsley Back Road.

Figure 2 provides a map of the non-colocation candidates considered for the proposed facility. Details on these alternative candidates are further outlined in **Table 2** along with the balance of alternative candidates considered as part of the site selection process.

Figure 2: Location of non-colocation candidates *Source: Google Earth*

Table 2: Summary of non-colocation candidates considered

Candidate	Location	Proposal	Zoning	Reason for exclusion/comments
Candidate A	Lot 1 King Street, Yelbeni WA 6487 Lat: -31.170203° Long: 117.661684°	Greenfield 40.0m monopole	Public Purpose – Public Use	This is considered the back-up candidate given its an existing Telstra exchange with access, ample room, available power, proximity to fibre access point and good separation from nearest premises. However, due to the complexity of co-siting existing and new underground services, the prime was selected.
Candidate B	No Street Address Lat: -31.167298° Long: 117.66558°	Greenfield 40.0m monopole	Rural	This is the preferred candidate and the subject of this application. The subject location is mostly cleared of any significant vegetation or existing built form performing better from a buildability review. Additionally, the

				location will seek to service the proposed Yelbeni Township Strategy and provide greater separation from existing and future residential/public use land.
Candidate C	4660 Kellerberrin-Yelbeni Road, South Yelbeni WA 6487 Lat: -31.176689° Long: 117.658162°	Greenfield 40.0m monopole	Rural	This candidate site is not preferable since it is further from the target coverage area, compromising Telstra's mobile coverage objectives. It would require approximately a new 105m access track and a new lengthy underground power and fibre route. Likely vegetation clearing would be required.
Candidate D	No Street Address Lat: -31.154619° Long: 117.65172°	Greenfield 40.0m monopole	Rural	This candidate site is not preferable since it is within a Special Control Area and furthest from the target coverage area, compromising Telstra's mobile coverage objectives. This site too would require power to be sourced from 2.5KM away.

8.3 Nominated Candidate

A preferred nominated candidate was selected for the proposed facility based on the radiofrequency objectives, property tenure, planning and environmental issues, potential community sensitive uses and engineering criteria as noted above. For this project, co-location on an existing telecommunications facility is not considered feasible and a new macro tower is considered suitable given:

- the site is technically feasible and can achieve Amplitel's coverage and capacity objectives by installing the new mobile base station;
- the site will provide improved coverage to the Yelbeni area;
- the proposed monopole will be located in a site with favourable zoning;
- the facility will maintain good separation from community sensitive places such as residences;

- the facility will not alter the land use and will support future carrier co-located facilities;
- the site is not located within a register for heritage or environmental conservation;
- the site is appropriately serviced and has access to the electricity supply network and existing transport network;
- the site will require no clearing of vegetation, with just the trimming of one tree inside the existing compound;
- the costs associated with delivering the site and constructing the facility are considered by Amplitel to be reasonable.

As stated above, the site selection process carefully considered environmental and visual constraints, existing and future land use characteristics, the orderly planning of the area and the design of the facility. On balance, it is considered that the location and height of the facility ensure optimal service provision to the area whilst minimising any perceived impacts. The proposal has been designed also to minimise any adverse impact on the amenity of the surrounding locality. The site is located at an rural agricultural , away from residences with no schools, childcare centres or healthcare premises in the vicinity.

8.4 Site context

The proposed facility is located just outside the Yelbeni township, approximately 325m east of Yelbeni South East Road.

The subject property a large rural/agricultural lot, formally known as Lot 12951 DP137522. The entrance to the property is taken directly off Nungarin-Wyalkatchem Road. The north-western corner of the lot subject to the proposed facility is mostly cleared of any existing vegetation or built form and is most accurately characterised as vacant land. The proposed location abuts to the north-east corner of the Yelbeni township, adjoining Crown Lands parcels reserved for conservation in the local planning scheme.

The nearest residence to the monopole will be approximately 350m South-West from the proposal. No other community sensitive places of interest are otherwise noted in the vicinity of the works, such as schools, healthcare and childcare centres.

The site location sits approximately 150m south from Yelbeni Nature Reserve, 400m north-east from the closest local heritage item ‘Mrs Drew's House’ (Place no. 10098) and 350m north-east from the closest item ‘Yelbeni Hall’ on the State Heritage register (Place no. 2611).

Figure 3: Aerial view of the proposed subject site relative to its immediate surrounds *Source: Google Earth, 2025*

The subject site at Lot 12951 DP137522, Yelbeni is surrounded by reserves, undeveloped land, low rise premises and townsite uses. The specific cardinal borders are provided in **Table 3**

Table 3: Summary of adjoining land uses

North	Road Reserve.
East	Rural and agricultural land.
South	Rural and agricultural land.
West	Yelbeni Township and Crown Lands conversation lots.

The surrounding area can be described as a rural outback town, used also for a brief stop for intrastate travelers.

8.5 Site details

Site Details	
Site address	No formal address.
Real property description	Lot 12951 DP137522
Coordinates	-31.167298, 117.66558

Site area	153.91 hectares
Registered owner	BIGTREES NOMINEES PTY LTD
Existing land use	Rural
Vegetation	Compound location free of all vegetation, proposed access track will require understory and shrub removal.
Topography	The proposal area is relatively flat
Services	Site has access to power, new access via Nungarin Wyalkatchem Road is proposed.

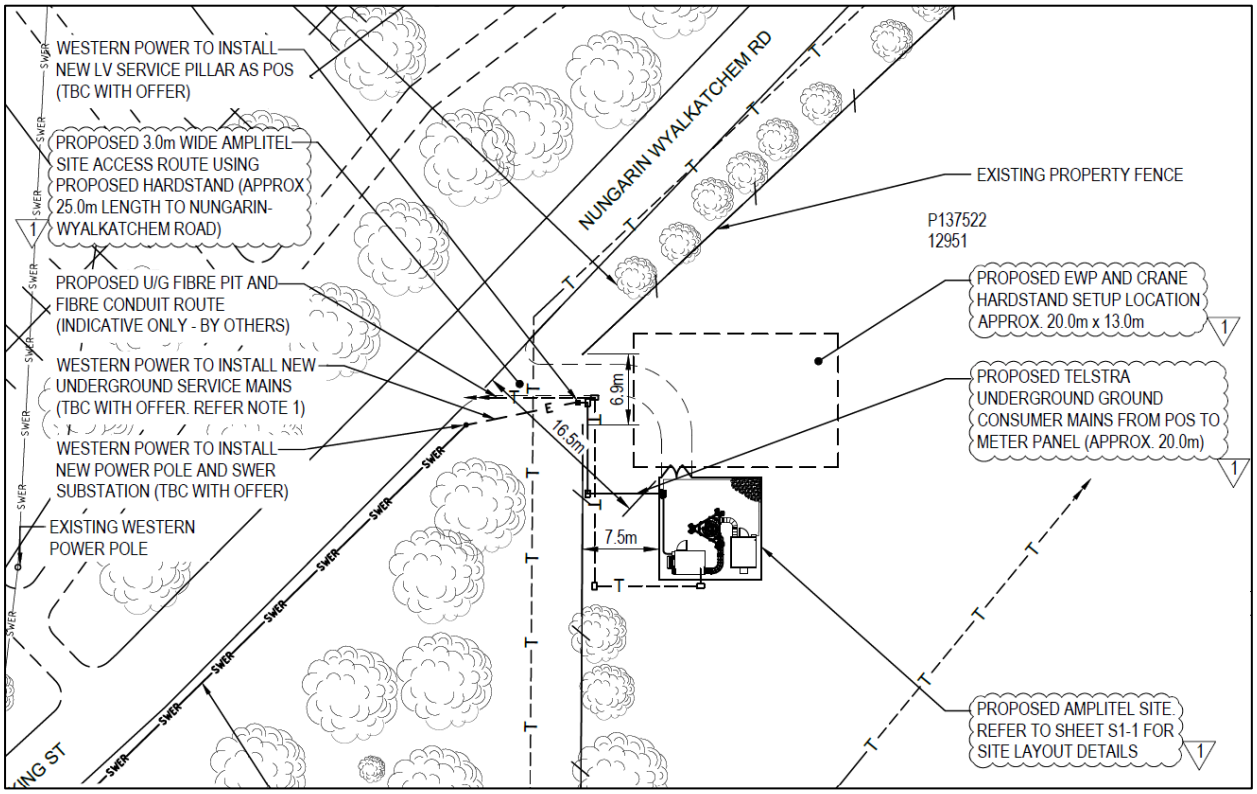


Figure 4: Subject site for Amplitel proposal. Source: excerpt from Plans of Proposal (Appendix A).

Figure 5: Subject site for Amplitel proposal (looking south-west towards subject site adjoining Nungarin-Wyalkatchem Road) – Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

Figure 6 to **Figure 9** show the area to be a secluded area away from the built environment, surrounded by trees and vacant agricultural land.

Figure 6: Subject site for Amplitel proposal (looking South towards subject site from the Nungarin-Wyalkatchem Road frontage) – Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

Figure 7: Subject site for Amplitel proposal (view looking north-east towards the subject site) – Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

Figure 8: Subject site for Amplitel proposal existing access track (view looking south from Nungarin-Wyalkatchem Road) – Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

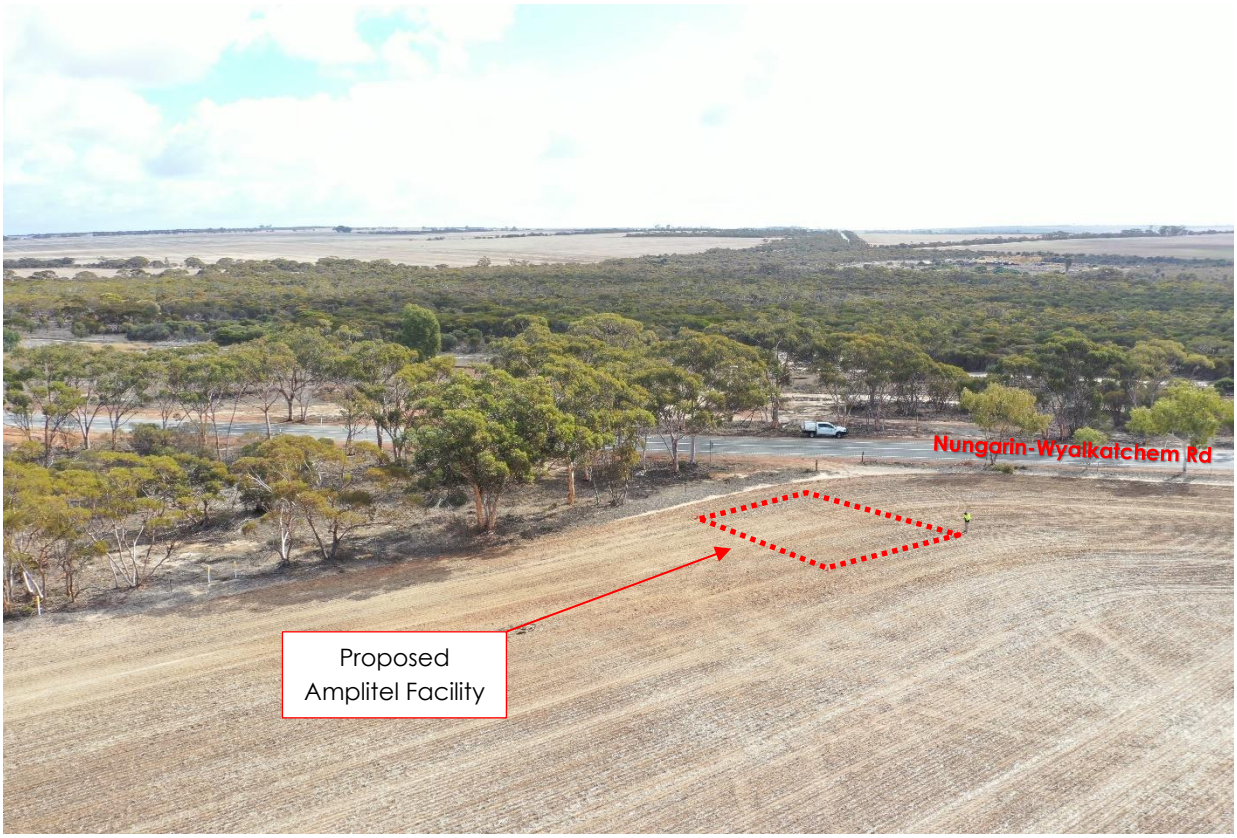


Figure 9: Subject site for Amplitel proposal (aerial drone view facing north) – Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

Figure 10: Subject site for Amplitel proposal (drone view looking west from eastern portion of subject lot) – Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

9.0 PROPOSAL DETAILS

The proposal is necessary to provide improved 4G and 5G telecommunications services within the Yelbeni area. The proposal is part of Telstra's network coverage expansion program but through Amplitel will support additional Carriers to co-locate on the proposed structure.

9.1 Facility and Equipment Overview

The proposed telecommunication installation requires the following works:

- Installation of one (1) new 40m high monopole;
- Installation of one (1) triangular headframe;
- Installation of six (6) new panel antennas (no greater than 2.8m in length);
- Installation of one (1) Telstra Equipment Shelter that is not more than 3m high with a base area of not more than 7.5m² at the base of the aforementioned tower;
- Installation of associated ancillary cabling and equipment; and
- Existing Telstra compound fencing to be upgraded.

The proposed monopole will be an unpainted, with a light external grey colour that blends with the sky backdrop. This is considered appropriate given the low level of visual impact from the proposed facility.

The proposal is demonstrated through the proposal plans, attached in **Appendix A**.

9.2 Access, traffic and parking

The north-western portion of the site is accessible from an existing access gate in fair condition off Nungarin-Wyalkatchem Road. (**Figure 11**)

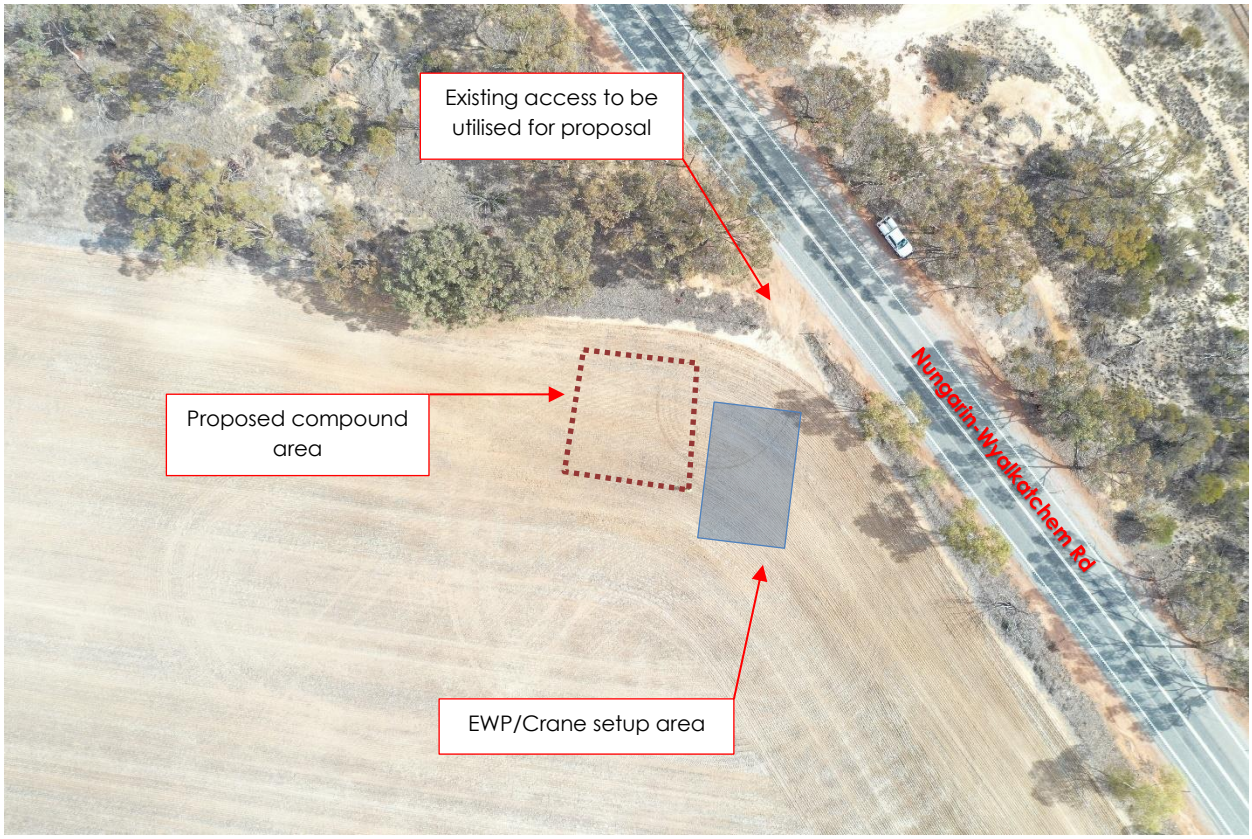


Figure 11 Existing and future access to subject site *Source: Ventia 2025*

Access to the facility for light and heavy vehicles will be via the existing access track off Nungarin-Wyalkatchem Road. The track will not need to be widened, nor will any of the existing shrubbery need clearing. Pruning of some branches is not anticipated.

Figure 12 Access track entry to Lot 12951 DP137522, Yelbeni *Source: Ventia 2025*

Mobile phone base stations require only infrequent maintenance visits (i.e. only two (2) to four (4) times per year). Furthermore, the site will operate on a continually unmanned basis. As such, the proposal will not be a significant generator of vehicular and/or pedestrian traffic. Dedicated parking spaces are therefore not considered necessary for the site given the very low traffic generation of the site and the unmanned nature of the site.

During the construction phase various vehicles will be used to deliver equipment and construct the proposed development. Any traffic impacts associated with construction and establishment will be of a short-term in duration (i.e. approximately five weeks over non-consecutive periods) and will be temporary in nature and will not affect existing traffic flows of the surrounding area. In the unlikely event that road closure is required Telstra will apply to the relevant authorities for permission.

9.3 Utilities

The proposal will involve a new below ground fibre route and pit to connect with the existing underground fibre network onsite. The proposal will connect with existing power running to site.

The unmanned nature of the proposed mobile base station removes the need for connection to water or sewer services.

Furthermore, the proposal incorporates very minimal hard surfaces and therefore will generate insignificant stormwater runoff from the site. As such, the proposal does not require connection to the stormwater network.

9.4 Construction schedule

The construction of the mobile base station will take approximately five to six weeks over non-consecutive periods, subject to weather.

The construction of the proposed mobile phone base station primarily consists of the following processes:

- Site preparation and foundation earthworks – Including site clearing and access track preparation;
- Tower foundation installation – Concreting of foundations and installation of underground conduits;
- Tower assembly including head frame and equipment shelter – Crane on site for duration of tower assembly;
- Installation of new equipment using an EWP and laying of cabling – reflective of the scope of works outlined within this Development Application; and
- Network Integration – Ensuring that the mobile phone base station can connect with both end users and other sites within the Telstra network.

No road closures will be required for the erection and installation of equipment, as all construction equipment can be set up on the subject property away from traffic.

9.5 Acoustic

Noise and vibration emissions associated with the proposed facility would be limited to the construction/demolition phase outlined above. The works are to be concluded in a timely manner with construction occurring over a period of 4 weeks, so that residents of the surrounding lots should not be inconvenienced in the long term.

During normal operation the noise emanating from the air- conditioning equipment would be similar to those used in domestic situations and will comply with the background noise levels given in *Australian Standard AS 1055*.

10.0 RELEVANT FEDERAL LEGISLATION

The following information provides a summary of the Federal legislation relevant to telecommunications deployment.

While Amplitel is not a Carrier itself, it is part of the Telstra Group and the proposed facility will serve Telstra initially. As a licensed telecommunications carrier, Telstra must operate under the provisions of the *Telecommunications Act 1997* and the following legislation and industry codes:

- The Telecommunications Code of Practice 2018;
- The Telecommunications (Low-impact Facilities) Determination 2018 (as amended);
- Mobile Phone Base Station Deployment Code; and
- The Environment Protection and Biodiversity Conservation (EPBC) Act 1999

10.1 Telecommunications Act 1997

The *Telecommunications Act 1997* (the Act) came into operation on 1 July 1997. The Act provides a system for regulating telecommunications and the activities of carriers and service providers. The aim of the *Telecommunications Act 1997* is to provide a regulatory framework that promotes:

- The long-term interests of end users of carriage services or of services provided by means of carriage services; and
- The efficiency and international competitiveness of the Australian Telecommunications Industry.

Under the *Act*, telecommunications carriers are no longer exempt from State and Territory planning laws except in three limited instances:

1. There are exemptions for the inspection of land, maintenance of facilities, installation of "low impact facilities", subscriber connections and temporary defense facilities. These exemptions are detailed in the Telecommunications (Low-impact Facilities) Determination 2018 and these exemptions are subject to the Telecommunications Code of Practice 2018;
2. A limited case-by-case appeals process exists to cover the installation of facilities in situations of national significance; and
3. There are some specific powers and immunities from the previous Telecommunications Act 1991.

10.2 Telecommunications Code of Practice 2018

The Telecommunications Code of Practice 2018 (The Code) authorizes a carrier to enter land, inspect land and install and maintain a facility. The Code emphasizes "best practice' for the installation of facilities, compliance with industry standards and minimization of adverse impacts, particularly in terms of degradation of the environment and visual impact. The proposal is considered to comply with "best practice" given the proposal will:

- provide improved telecommunications and wireless internet coverage in the Yelbeni area;
- be located on a non-residential site within the local area, which maximizes separation to residential and other sensitive uses; and
- Comprises the smallest configuration possible for the site to reduce the visual impact of the proposal, while providing appropriate coverage to the surrounding area.

10.3 Telecommunications (Low-impact Facilities) Determination 2018

The *Telecommunications (Low-impact Facilities) Determination 2018* came into effect in March 2018.

The *Determination* contains a list of Telecommunications Facilities that the Commonwealth will continue to regulate. These are facilities that are essential to maintaining telecommunications networks and are unlikely to cause significant community disruption during their installation or operation. These facilities are therefore considered to be 'Low-impact' and do not require planning approval under State or Territory laws.

The proposed facility at Yelbeni does not fall under the *Determination* and, therefore, requires approval under State planning legislation.

10.4 Communications Alliance Ltd. Industry Code C564: 2020 – Mobile Phone Base Station Deployment

The Communications Alliance Limited – *Mobile Phone Base Station Deployment C564:2020* (the Deployment Code) is an industry code of practice registered by the Australian Communications and Media Authority. All licensed telecommunications carriers must abide by the Deployment Code provisions.

The code does not change any regulations at a local, State or Federal level, but supplements these regulations applying to telecommunications carriers, including Telstra. The code sets guidelines for site selection, community consultation, design, installation and operation of telecommunication facilities.

The subject proposal, not being designated a 'Low-impact' Facility', is not subject to the notification or consultation requirements associated with the Deployment Code. These processes are handled within the relevant State and Local consent procedures.

Though the Code does not apply to the proposed development, the intent of the *Code* is to ensure Carriers follow a 'precautionary approach' to the siting of infrastructure away from sensitive land uses and this approach has been followed in the selection of this site, as demonstrated in the *Deployment Code* section 4.1 and 4.2 Precautionary Approach Checklists. The checklists will be uploaded to the RFNSA website, reference number 6487001.

Included in this section's Checklist is a statement of how the public's exposure to EME from the site has been minimised. All emissions from the site will be well within the requirements of the relevant Australian Standard. Details of this standard are contained in the following section.

This site has been selected and designed to comply with the requirements of the *Deployment Code* in so much as the precautionary approach has been adhered to and, as a result, the best design solution has been achieved.

10.5 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection Biodiversity Conservation Act 1999* (the EPBC Act) controls matters of national environmental significance. The key objectives of the EPBC Act include:

a. "To provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance; and
b. To promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources; and
c. To promote the conservation of biodiversity; and
d. To provide for the protection and conservation of heritage…"

Amongst other aspects, the EPBC Act relates to matters of national environmental significance, including world heritage areas, natural heritage places (including declared RAMSAR wetland

areas), listed threatened species in communities, listed migratory species, protection of environment on nuclear actions, and environment matters.

The proposal is **not** identified as having a significant impact on any of the above matters of national environmental significance. Therefore, the proposal will not require a referral to the Government Minister for the Environment for assessment.

10.6 Native Title Act 1993

The *Native Title Act 1993* (the **Native Title Act**) was given effect on 1 January 1994 and recognises the rights and interests of Aboriginal and Torres Strait Islander people in land and waters according to their traditional laws and customs. The Native Title Act also sets out processes through which development as a Future Act can proceed with regards to the rights and interests of Traditional Owners.

The subject site is identified on a site that is the subject of a single Native Title claim. (WCD2021/010) A determination was made 1st of December, 2021 that Native Title does not exist over the claim area (**Figure 13**).

Under section 23B of the Native Title Act, native title can be extinguished by previous exclusive possession, where that previous exclusive possession includes a grant or vesting that was granted or created on or before 23 December 1996.

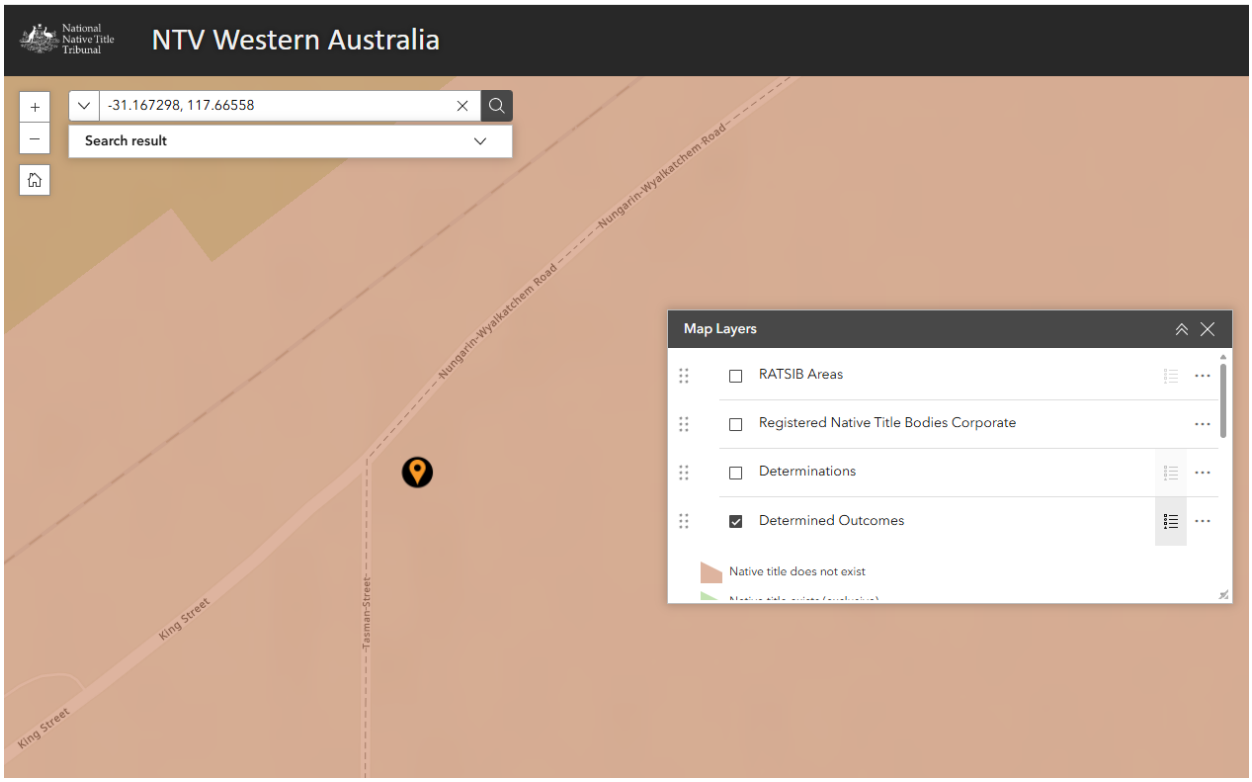


Figure 13: Excerpt of Native Title Tribunal Vision showing relevant Native Title determination in area surrounding subject site *Source: Native Title Tribunal Vision, 2025*

11.0 STATE REGULATORY FRAMEWORK

The following information provides a summary of the State legislation/guidelines relevant to telecommunications development proposals.

11.1 Aboriginal Heritage Act 1972

The *Aboriginal Heritage Act 1972* (the **Aboriginal Heritage Act**) is the main piece of legislation within Western Australia with regards to Aboriginal cultural heritage. The Aboriginal Heritage Act sets out the requirements for ensuring that Aboriginal heritage is appropriately identified and protected.

Under the Aboriginal Heritage Act the Western Australian must maintain an Aboriginal Sites Register where specific places of importance and significance to Aboriginal people are recorded and protected by Law.

Section 5 of the Aboriginal Heritage Act defines an Aboriginal site as:

a) Any place of importance or significance where people of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of Aboriginal people, past or present;

b) Any sacred, ritual or ceremonial site, which is of importance and special significance to people of Aboriginal descent;

c) Any place which, in the opinion of the committee, is or was associated with Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State; and

d) Any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of the Act, such objects have been taken or removed.

As a result of this definition a breach of Section 17 of the Aboriginal Heritage Act occurs when a person excavates, destroys, damages, conceals or in any way alters any Aboriginal site; or who deals with in a manner not sanctioned by relevant custom, or assumes the possession, custody or control of, any object on or under an Aboriginal site, commits an offence unless he is acting with the authorization of the Registrar under Section 16 or the consent of the Minister under Section 18.

Regulation 10 Consent can be granted by authorization by the Registrar or Minister under the AHA, usually granted for non-deleterious, site-preservation land uses (rehabilitation) or in emergencies. Aboriginal sites broadly fall into two categories, archaeological and anthropological or ethnographic sites. Archaeological sites are generally where material evidence of Aboriginal people's traditional cultural life is found. Sites of this type consist of artefact scatters, stone structures, marked trees, fish traps, middens, cave or rock paintings/engravings, arranged stones and burial sites. Most archaeological sites are prehistoric, but some are also more contemporary in nature and are where Aboriginal cultural material objects from the post settlement period are found.

Ventia has conducted an assessment of the area against the Aboriginal Heritage Due Diligence guidelines (the **Guidelines)**, as published originally by the Department of Aboriginal Affairs &

Department of the Premier and Cabinet. This assessment considered that the Aboriginal Heritage Inquiry System shows that the works area is a far 26KM+ North East from the public boundary of the nearest site 'WYALKATCHEM 2'(Lodged Place ID 4510). The project therefore is immune from approvals under the *Aboriginal Heritage Act 1972* notwithstanding the unlikely discovery of Indigenous artefacts and remains.

Given the site has been subject to previous disturbance with the clearing of vegetation for access tracks and telecommunication uses, it is considered less likely that aboriginal relics could be unearthed during the works.

The area where works (including ground disturbance) are proposed (the **works area**) is just a 100m^2 (10m x 10m) site at Lot 12951 DP137522, Yelbeni. The site also is not in close proximity to other potential risk factors including freshwater, elevated lookouts, exposed stone or rock and other relevant factors.

This assessment has determined the area is not of high or medium risk for aboriginal heritage, therefore the works may proceed without further approval.

11.2 Planning and Development Act 2005

The Minister of Planning and Infrastructure has ultimate authority for town planning in Western Australia. Development within Western Australia is controlled by the *Planning and Development Act 2005* through the application of environmental planning instruments. Under the *Planning and Development Act 2005*, the Western Australian Planning Commission (**WAPC**) is the responsible authority for land use planning and development matters and this report seeks to demonstrate compliance with the WAPC and other items of relevant legislation which pertain to the subject application.

11.3 State Planning Policy No. 5.2 – Telecommunications Infrastructure (WAPC)

State Planning Policy 5.2: Telecommunications Infrastructure Policy aims to aims to balance the need for effective telecommunications services and effective roll-out of networks, with the community interest in protecting the visual character of local areas. The SPP applies for above and below telecommunications infrastructure, other than those exempted under the Commonwealth Telecommunications Act 1997.

Under section 5.1.1 of the State Planning Policy 5.2: Telecommunications Infrastructure Policy the West Australian Planning Commission provides a set of measures in assessing the visual impact of a proposed telecommunications facility.

An assessment of these guidelines below has found that the proposed Telstra Mobile Phone Base Station is compliant with the intent and requirements of the State Planning Policy 5.2: Telecommunication Infrastructure Policy.

Table 5: Assessment against State Planning Policy 5.2, Policy Measure 5.1.1

Measures	Comments	Complies
Be located where it will not be prominently visible from significant viewing locations	The proposed 40m monopole has been sited to maintain the primary use of the land whilst considering the impact to the surrounding locality.	✓

such as scenic routes, lookouts and recreation sites;	While the tower would constitute being the highest feature in Yelbeni following construction, it will not disturb views looking towards the Yelbeni Nature Reserve or unacceptably encroach over views towards nearby heritage places as it adjoins neither land affected, maintaining good separation from the protected sites.	
Be located to avoid detracting from a significant view of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land;	The monopole located on the vacant rural lot at the corner of the Yelbeni township is positioned behind exiting nature vegetation which will assist in softening the visual impact. The site will be located close to the built-up area, away from the town's primary streetscape at Yelbeni South East Road where much of the heritage items are clustered. The monopole therefore will not detract from the heritage significance of either the local listed 'Mrs Drew's House' (Place no. 10098), 'Yelbeni Store' (Place no. 10096), 'Yelbeni Store Residence' (Place no. 10097) and State Heritage registered 'Yelbeni Hall' (Place no. 2611).	✓
Not be located on sites where environmental, cultural heritage, social and visual landscape values may be compromised;	The proposed works will not intersect with any area or feature reserved for heritage protection or environmental conservation, nor will it threaten any matters of national or state significance. The proposal also will not be unacceptably visually prominent from the nearest residences. Any visual impact has been mitigated through a variety of design elements along with existing visual buffers present surrounding the location.	✓
Display design features, including scale, materials, external colours and finishes that are sympathetic to the surrounding landscape;	The proposed 40m concrete monopole will remain unpainted (dull grey in colour) blending in with the sky, trees and powerlines from a distance as it will have a slimmer body than the typical lattice tower. The proposed equipment shelter will not be more than 3m high or have a base area exceeding 7.5m². The structure, shelter and facilities will sit unremarkably among the landscape.	✓
Be located where it will facilitate continuous network coverage and/or improved telecommunications services to the community;	The proposed location at Lot 12951 DP137522 is strategically well positioned within the candidate search area and will provide improved and continuous coverage to the locality, also providing other Carriers with the opportunity to co-locate their infrastructure in the future.	✓
Telecommunications infrastructure should be co-located and whenever possible: Cables and lines should be located within an existing underground conduit or duct; and Overhead lines and towers should be co-located with existing infrastructure and/or	As per Section 7 of this report, no suitable opportunities for co-location were identified in the area and it has been identified that the proposed Amplitel site is seen as the preferred location. Colocation was investigated; however, the locations are too far from the subject area to meet the coverage objectives of the project or lack the structural capacity to support a new headframe, panel antennas and other facilities.	✓

within an existing infrastructure corridor and/or mounted on existing or proposed buildings.	Therefore, it has been identified that the area of land at the Lot 12951/DP137522 reserve is seen as the preferred site location. As mentioned previously, the proposed Amplitel monopole will also provide other Carriers with the opportunity to co-locate their infrastructure in the future. Overhead lines are not applicable to this application.	

Overall, the proposed development application is consistent with the intent and requirements of the SPP 5.2.

11.4 Statement of Planning Policy No. 5.2 – Telecommunications Infrastructures (WAPC)

With the gazettal of State Planning Policy 5.2, the WAPC *Statement of Planning Policy No. 5.2 – Telecommunications Infrastructure* (Statement 5.2) has been repealed. However, it is recognised that the Statement 5.2 provides a more holistic set of criteria than SPP 5.2 which largely focuses on visual impacts. Given this, an assessment of the guiding principles of Statement 5.2 is provided in **Table 6**.

Table 6 Assessment against Statement 5.2 Guiding Principles

Principles	Comments	Complies
There should be a co-ordinated approach to the planning and development of telecommunications infrastructure, although changes in the location and demand for services require a flexible approach.	Telstra undertakes a carefully co-ordinated and planned approach to the development of their network.	✓
Telecommunications infrastructure should be strategically planned and co-ordinated, similar to planning for other essential infrastructure such as networks and energy supply.	The proposed facility is strategically planned and co-ordinated to ensure that the facility will provide high level coverage to the Yelbeni area. The proposed facility will allow for future co-location by other telecommunication providers, ensuring no other similar scale facilities are required in the future to provide essential telecommunication services.	✓
Telecommunications facilities should be located and designed to meet the communication needs of the community.	The proposed facility is strategically planned and co-ordinated to ensure that the facility will provide high level coverage to the Yelbeni area.	✓

Telecommunications facilities should be designed and sited to minimise any potential adverse visual impact on the character and amenity of the local environment, in particular, impacts on prominent landscape features, general views in the locality and individual significant views.	The proposed 40m monopole has been sited to maintain the primary use of the land whilst considering the impact to the surrounding locality. While the tower would constitute being the highest feature in Yelbeni following construction, it will not disturb views looking towards the Yelbeni Nature Reserve or unacceptably encroach over views towards nearby heritage places as it adjoins neither land affected, maintaining good separation from the protected sites.	✓
Telecommunications facilities should be designed and sited to minimise impacts on areas of natural conservation value and places of heritage significance or where declared rare flora are located.	The proposed telecommunications facility will not be located within or adjacent to a heritage item, conservation area or threaten any regulated vegetation within an environmentally sensitive area. The proposed works will not require the clearing of any vegetation, with just the necessary trimming of branches that may obstruct the access track. The affected flora is regulated or identified as belonging to a threatened or priority ecological community and is not within an environmentally sensitive area. The proposed works will incorporate visually sympathetic design elements and maintain a sizeable distance from the local listed 'Mrs Drew's House' (Place no. 10098), 'Yelbeni Store' (Place no. 10096), 'Yelbeni Store Residence' (Place no. 10097) and State Heritage registered 'Yelbeni Hall' (Place no. 2611).	✓
Telecommunications facilities should be designed and sited with specific consideration of water catchment protection requirements and the need to minimise land degradation.	Prior to the commencement of work Telstra will undertake such measures as deemed necessary by Council to effectively protect water catchments within the immediate area.	✓
Telecommunications facilities should be designed and sited to minimise adverse impacts on the visual character and amenity of residential area.	The proposed 40m concrete monopole achieves satisfactory separation from the residences in Yelbeni, sited on the outskirts of the built-up township away from existing residences and potential future rural residential parcels. The nearest house does not adjoin the site and is approximately 350m south from it, separated by Crown Land conservation parcels. The nearest residence's façade also does not face the telecommunications facility.	✓

Telecommunications cables should be placed underground, unless it is impractical to do so and there would be no significant effect on visual amenity or, in the case of regional areas, it can be demonstrated that there are long-term benefits to the community that outweigh the visual impact.	Overhead cabling is not proposed for this site.	N/A
Telecommunications cables that are installed overhead with other infrastructure such as electricity cables should be removed and placed underground when it can be demonstrated and agreed by the carrier that it is technically feasible and practical to do so.	This principle does not apply to the subject of this application.	N/A
Unless it is impractical to do so telecommunications towers should be located within commercial, business, industrial and rural areas and areas outside identified conservation areas.	The proposed site is a lot zoned for 'Rural' as identified by the *Shire of Trayning Local Planning Scheme No. 1*. As the candidate search ring overlayed predominantly within Townsite or Crownlands Conservation reserves, it is considered that the siting of the prime candidate at the easter interface of the built-up area within mitigates the proposal from being visually obtrusive towards the nearest residences and shops.	✓
The design and siting of telecommunications towers and ancillary facilities should be integrated with existing buildings and structures, unless it is impractical to do so, in which case they should be sited and designed so as to minimise any adverse impact on the amenity of the surrounding area.	As per Section 7 of this report, no suitable opportunities for co-location were identified in the area and it has been identified that the proposed Amplitel site location is seen as the preferred site location. Colocation was investigated; however, the existing structures explored were either too far from the subject area to meet the coverage objectives or lacked both the structural integrity and capacity to host the new Telstra facilities proposed, let alone other future carrier co-located facilities.	✓
Co-location of telecommunications facilities should generally be sought, unless such an arrangement would detract from local amenities or where operation of the facilities would be significantly compromised as a result.	As per Section 7 of this report, no suitable opportunities for co-location were identified in the area and it has been identified that the proposed Amplitel site location is seen as the preferred site location. Colocation was investigated; however, the existing structures explored were either too far from the subject area to meet the coverage objectives or lacked both the structural integrity and capacity to host the new Telstra facilities	✓

	proposed, let alone other future carrier co-located facilities.	
Measures such as surface mounting, concealment, colour co-ordination, camouflage and landscaping to screen at least the base of towers and ancillary structures, and to draw attention away from the tower, should be used, where appropriate, to minimise the visual impact of telecommunications facilities.	The proposed 40m concrete monopole will remain unpainted (dull grey in colour) blending in with the sky, trees and powerlines from a distance as it will have a slimmer body than the typical lattice tower. The proposed equipment shelter also will not be more than 3m high or have a base area exceeding 7.5m². The structure, shelter and facilities will sit unremarkably among the surrounding landcape, resembling mobile base stations throughout rural Western Australia.	✓
Design and operation of a telecommunications facility should accord with the licensing requirements of the Australian Communications Authority, with physical isolation and control of public access to emission hazard zones and use of minimum power levels consistent with quality services.	Telecommunications facilities include radio transmitters that radiate electromagnetic energy (EME) into the surrounding area. The levels of these electromagnetic fields must comply with safety limits imposed by the Australian Communications and Media Authority (ACMA, previously ACA). All Telstra installations are designed to operate within these limits.	✓
Construction of a telecommunications facility (including access to a facility) should be undertaken so as to minimise adverse effects on the natural environment and the amenity of users or occupiers of adjacent property and to ensure compliance with relevant health and safety standards.	During construction Telstra contractors will endeavour to minimise the impact of their works on the amenity of the nearest residents and on the surrounding environment. Following construction, maintenance (excluding emergency repair work) activities should not interfere with the amenity of users. All Health and Safety standards will be adhered to.	✓

Overall the proposed development application is consistent with the intent and requirements of the Statement 5.2

12.0 LOCAL REGULATORY FRAMEWORK

The following information provides a summary of the local provisions relevant to telecommunications development proposal.

12.1 Shire of Trayning Local Planning Scheme No. 1

The *Shire of Trayning Local Planning Scheme No. 1* provides the basis for planning in the Shire of Trayning local government area.

The proposed site is within the Rural Zone (**Figure)** further outlined in **section 12** of this report.

In the Shire of Trayning's Local Planning Scheme text, neither 'telecommunications' or 'infrastructure' is listed, however 'service utility' is a featured term defined also as '*any work or undertaking constructed or maintained by a service authority or the Council as may be required to provide water, sewerage, electricity, gas, drainage, waste,* ***communications*** *or other similar services.*' Ventia have undertaken an assessment of the proposal against section 4.2 'Rual Zone' objectives. Ventia believe the proposal shall comply with the general requirements and that the nature of the development should be deemed appropriate relative to these controls.

While the *Shire of Trayning Local Planning Strategy* does not make specific mention of telecommunications facilities and mobile coverage, it does promote the provision of underground telecommunications infrastructure in Part 5.9 of the strategy and repeatedly conveys a desire for infrastructure to keep up with demand. Irrespective whether the local planning strategy calls out mobile base station developments or not, this proposal is considered to compliment the strategies vision for a diversified economy, strong jobs market and tourism industry. Furthermore, improved coverage can also bridge gaps between rural and urban communities and enhance safety and emergency services response capabilities.

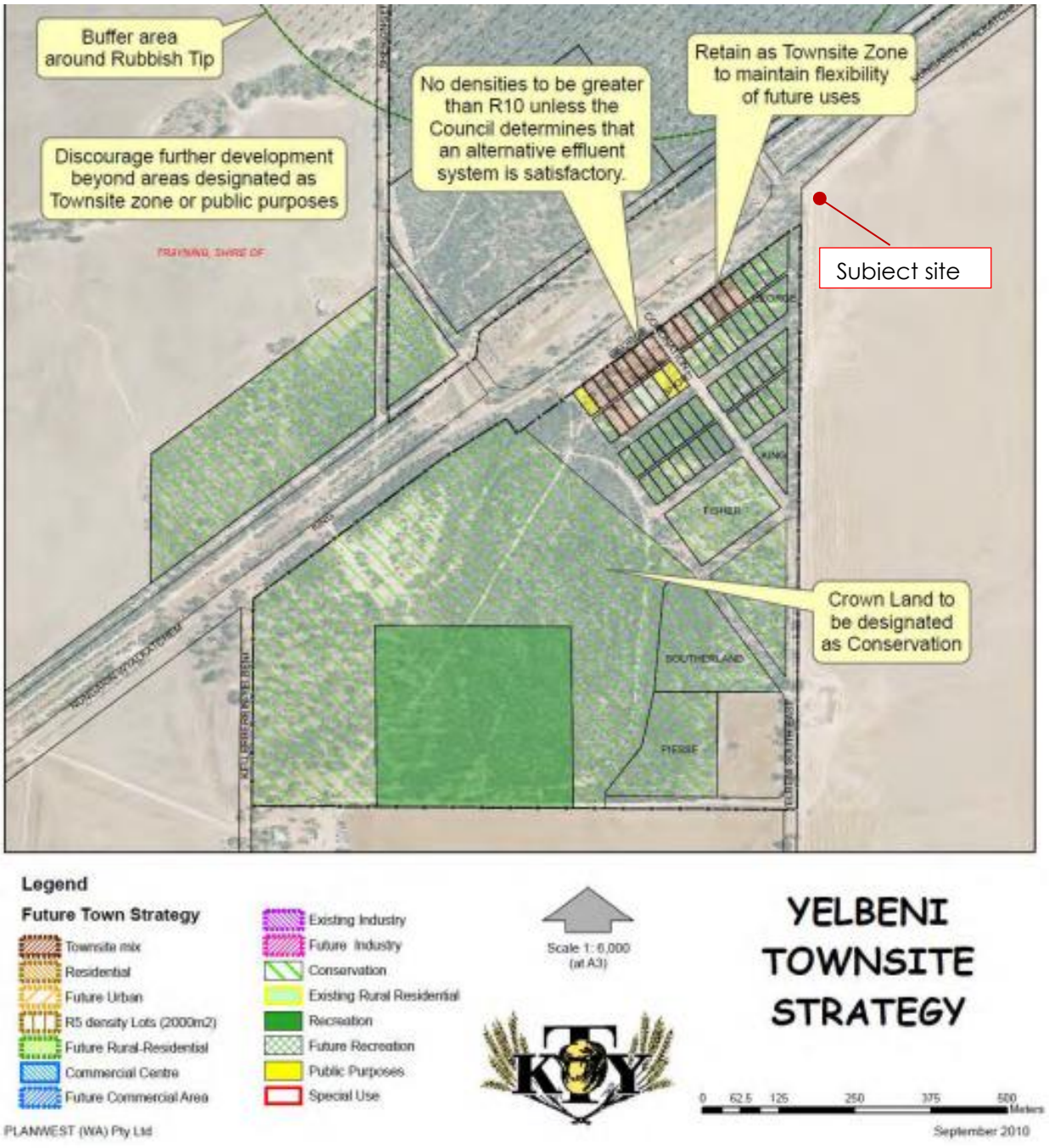


Figure 14: Zoning Map Figure 5 Yelbeni Strategy Plan - *Source: Shire of Trayning Local Planning Strategy*

12.2 Rural Zone Objectives

Development within the Rural Zone is required to demonstrate compliance with the objectives and site requirements of the zone within the local planning scheme.

This proposal therefore can be assessed against the Rural Zone objectives set out in section 4.2 of the Part 4 Zones and the Use of Land in the *Shire of Trayning Local Planning Scheme No. 1.* Please see **Table 6** below for more detail.

Objectives	Comments	Complies
To provide for a range of rural pursuits that are compatible with the capability of the land and retain the rural character and amenity of the locality.	This proposal seeks to introduce telecommunications facilities to Yelbeni in order facilitate the provision of enhanced 4G and 5G telecommunications coverage to this rural town and surrounds. The facility represents essential infrastructure services required in all land use designations where people work and live. The proposal will be isolated to a far corner of the rural lot, and not detract from the existing rural character and amenity of the locality.	✓
To protect the land from closer development that would detract from the rural character and amenity of the area.	The proposal will not detract from the character and amenity of the rural area, given its minimal building footprint, and isolated location in the far northern corner of the subject lot.	✓
To prevent any development that may affect the viability of a holding.	The proposal seeks to compliment the existing region via the provision of introduced and enhanced 4G and 5G telecommunications coverage to this rural town and surrounds, by which supporting the viability of the subject holding.	✓
To encourage small scale, low impact tourist accommodation in rural locations.	The introduction and enhancement of 4G and 5G coverage for the Yelbeni region will assist in supporting the operation of local businesses who seek to establish and operate small scale, low impact tourist accommodation in this rural region.	✓
To encourage a diversification of rural activities that will reduce the dependency of the rural sector on traditional crops.	The proposal seeks to introduction and enhances 4G and 5G coverage for the Yelbeni region. Coverage will assist both existing and future rural activities/operations to aid in the diversification of the rural sector.	✓
To support mining activities where an environmental management plan has been prepared and is acceptable to the Council and EPA.	Not applicable. The subject proposal is for the establishment of a telecommunications facility.	N/A
To preclude the disposal of used tyres or any other material that may be	The proposal will not require the use of any materiality, such as tyres, deemed to be detrimental to the quality of the land.	✓

detrimental to the quality of the land.		
To provide for the mining of nuclear resources but not the use or storage of such meterials.	Not applicable. The subject proposal is for a telecommunication facility.	N/A

Overall, the proposed development application is consistent with the intent and requirements of the *Western Australian Planning Commission SPP 5.2, Shire of Trayning Local Planning Strategy* and the *Shire of Trayning Local Planning Scheme No. 1*.

13.0 GENERAL PROVISIONS

This proposal is for a new Telstra Mobile Base Station Facility in the Yelbeni area.

Amplitel considers that the proposal is appropriate for the locality, given its compatibility with surrounding rural landuses and separation from much of Yelbeni township.

Environmental considerations such as visual impact, heritage, flora and fauna, traffic, bushfire risk, social and economic aspects, health and safety have been discussed throughout the report and/or within the below sub sections.

13.1 Visual Impacts

The visual impact of the proposal towards the surrounding vicinity is considered overall to be acceptable.

While the site is close to some premises, with the nearest built residence approximately 350m away, the site location has several benefits which make it a superior candidate when compared with all other alternatives discussed in **Section 8.2** of the report.

The advantage of Lot 12951 DP137522, is that the subject location being on the outer adjoining lot of the Yelbeni Township, allows for sufficient separation from existing and future designated residential and community lots. The addition of several designated Crown Land conservation lots, as part of the Yelbeni Township Strategy, safeguards the existing separation and amenity for years to come.

Despite the structure and facilities visibility from residences and the immediate surrounds, it will not significantly encroach over views towards a heritage place, conservation park, or wilderness area, or unacceptably disturb any view towards a residence or any other appreciable view. Please see **Figure 15** below for reference. The proposal has therefore been appropriately sited in order to avoid compromising as best as practical the areas visual amenity and Telstra's 5G radiofrequency coverage objectives.

Additionally, design measures have been applied to further mitigate visual impact, with the proposed structure's appearance being dull and non-reflective with a neutral, light colour, with the headframe and antennas protruding as minimally as possible. This reduces its visual bulk and enables it to blend more seamlessly with the sky, electricity lines and trees when viewed from afar.

On the whole, Telstra believes the benefits the proposal will bring to local residents and businesses will far outweigh any low to moderate visual impact towards the surrounding landscape.

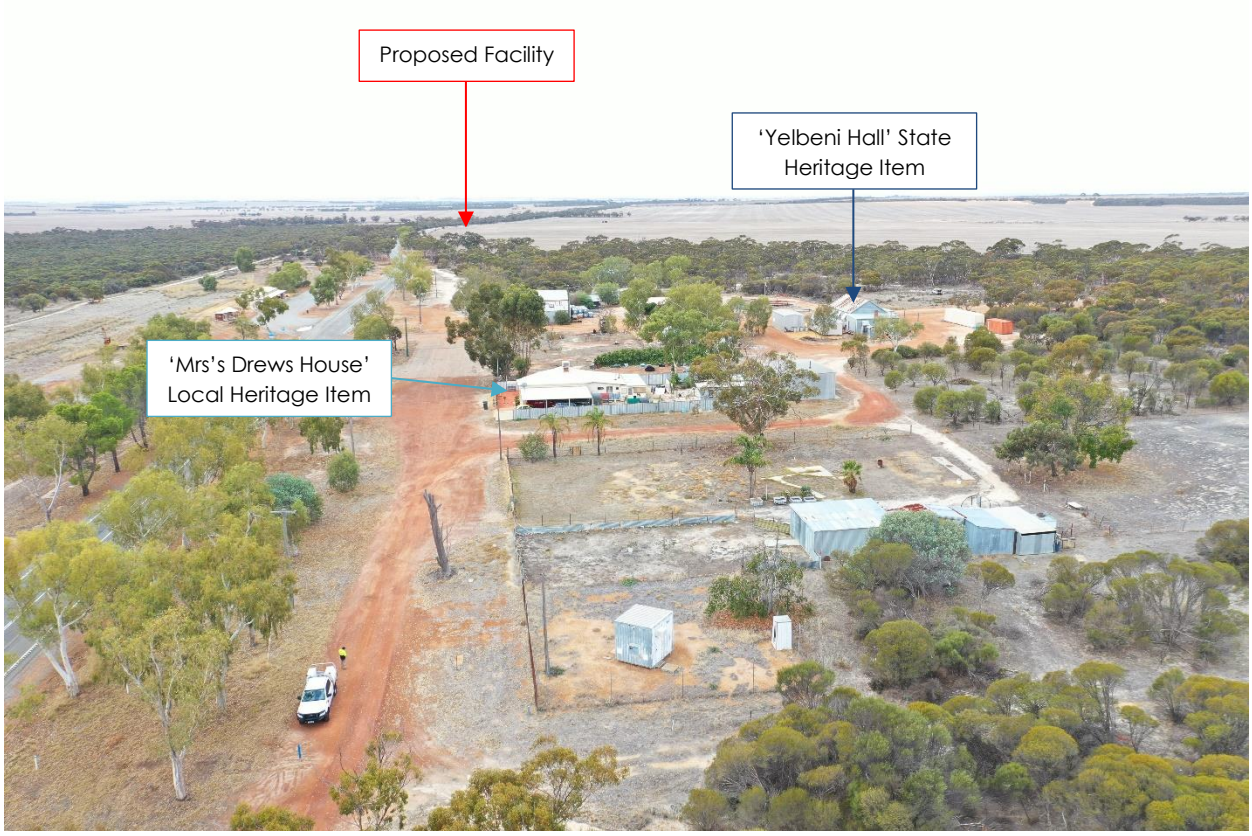


Figure 15: Drone photo looking East across Yelbeni towards subject site. *Source: Ventia 2025*

13.2 Heritage

A search of the relevant heritage registers does not identify any heritage items overlaying with the subject site location or at threat from the proposed works.

There are no Commonwealth, World, or National Heritage Places identified in the site location according to the Commonwealth Department of the Environment and Energy mapping. See sections **11.1**, **11.3** and **11.4** for further information.

13.3 Flora and Fauna

In order to determine any possible natural Flora and Fauna significance associated with the site, a search was conducted during a site survey together with a search through the relevant environmental registers.

The Protected Matters Search Tool from the Department of the Environment and Energy shows matters of national environmental significance or other matters protected by the *Environment Protection and Biodiversity Conservation Act 1999*. A search using this tool found that just the threatened ecological community of 'Eucalypt Woodlands of the Western Australian Wheatbelt' is 'likely to occur' within the 500m surrounds of the proposed site location. Further details regarding the report findings can be found in **Appendix C** which identifies 18 threatened species and 6 migratory species which may occur within the area.

A search using the Department of Water and Environmental Regulation's 'clearing permit system map' also shows that the site is not an environmentally sensitive area or environmental conservation area.

As there will be no destruction to fauna habitat or clearing of native vegetation, with ground excavation works confined to road reserves, access tracks and the proposed compound site, no disturbance to listed communities of flora and fauna is anticipated.

13.4 Bushfire

The specific site location is identified as being within a Bush Fire Prone Area by the Fire and Emergency Services Commissioner (**Figure 19**).

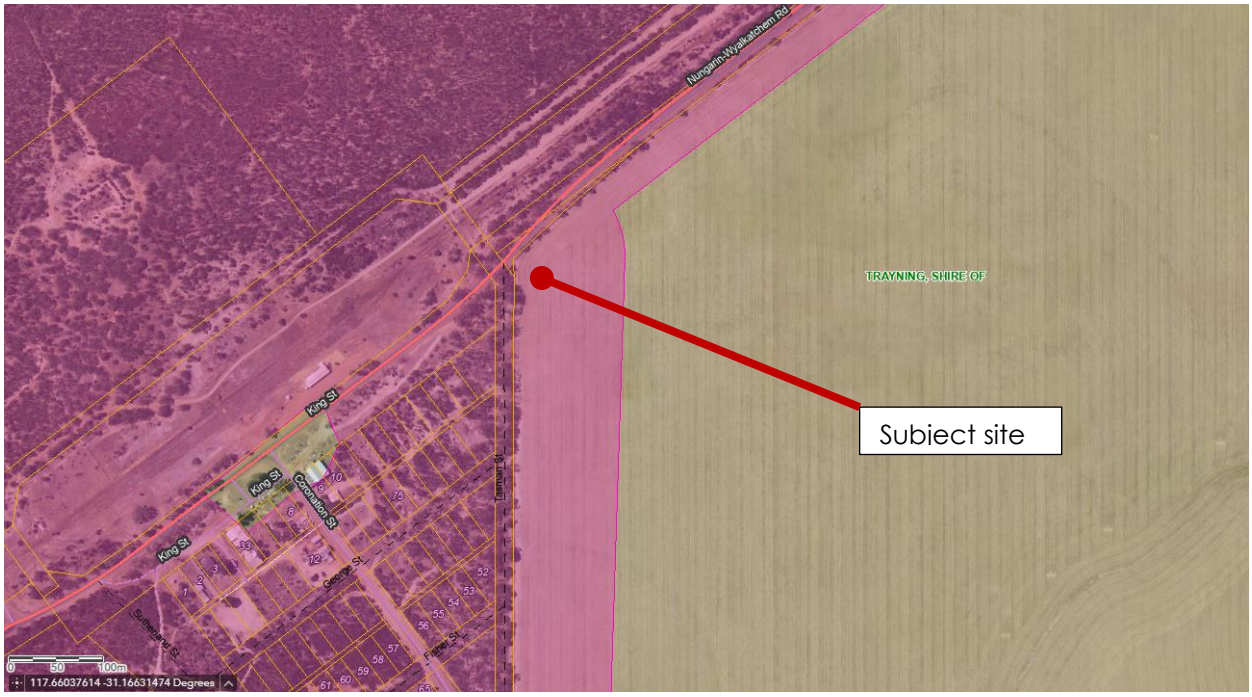


Figure 19: Bushfire Prone Areas Mapping *Source: SLIP Map of Bushfire Prone Areas 2024*

Natural disasters, including the continuing threat of bushfires, have served to highlight the critical importance of effective telecommunications. Previous bushfire incident reviews have demonstrated effective telecommunications networks are essential for disaster response management, allowing emergency services providers to be alerted to medical or fire emergencies.

In its Communications Report 2014-2015 the Australian Communications and Media Authority reported that in 2014 -15, 66.9% of calls to the 000 emergency number were made from mobile phones. Therefore, in addition to day-to-day personal and business applications, effective telecommunications networks can be the difference between life and death in disaster situations.

The entirety of the facility will be earthed in accordance with the Australian Standard. Earthing draws any lightning strike underground away from combustible material. It is submitted that contrary to being a risk factor for fires, the site in this case could reduce the risk of lightning strike causing fires, by attracting the strike and earthing it underground.

The State Planning Policy 3.7 provides the foundation for land use planning to address bushfire risk management in Western Australia. Notwithstanding the Department of Planning updated *Planning Bulletin 111/2016* to clarify that for telecommunications infrastructure, SPP 3.7 should be applied pragmatically.

The Planning Bulletin states:

"*Exemptions from the requirements of SPP 3.7 and the deemed provisions should be applied pragmatically by the decision maker. If the proposal does not result in the intensification of development (or land use), does not result in an increase of residents or employees; or does not involve the occupation of employees on site for any considerable amount of time, then there may not be any practicable reason to require a BAL Assessment. Exemptions may apply to infrastructure including roads, telecommunications and dams; and to rural activities, including piggeries and chicken farms which do not involve employees on site for a considerable amount of time*."

With respect to the above, Amplitel believe that all necessary design measures have been undertaken to ensure the facility does not increase or affect the bushfire risk to the area. The subject site is on a flat terrain and the proposed monopole and equipment shelter will be made from pre-fabricated and non-combustible materials, with siting that ensures separation from the closest shrubbery abutting the Southern and Western fences face. The pruning of branches from the one tree inside the fenced compound will further alleviate bushfire hazard risks associated with the development. Additionally, the proposed facility will operate on an unmanned basis requiring only 2-4 maintenance visits per year. Therefore, the proposed works do not increase the extent of bushfire risk currently affecting the land.

13.5 Health and Safety

Telstra acknowledges some people are genuinely concerned about the possible health effects of electromagnetic energy (EME) from mobile phone base stations and is committed to addressing these concerns responsibly.

Telstra, along with the other 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 2003 the ACMA adopted a technical standard for continuous exposure of the general public to RF EME from mobile base stations. The standard, known as the *Radiocommunications (Electromagnetic Radiation – Human Exposure) Standard 2003*, 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 any Carrier 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 at all times. It has a significant safety margin, or precautionary approach, built into it.

In order to demonstrate compliance with the standard, the ARPANSA created a prediction report using a standard methodology to analyse the maximum potential impact of any new

telecommunications facility. Carriers are obliged to undertake this analysis for each new facility and make it publicly available.

Importantly, the ARPANSA-created compliance report demonstrates the maximum signal strength of a proposed facility, assuming that it is handling the maximum number of users 24-hours a day.

In this way, the ARPANSA requires network carriers to demonstrate the greatest possible impact that a new telecommunications facility could have on the environment to give the community greater peace of mind. In reality base stations are designed to operate at the lowest possible power level to accommodate only the number of customers using the facility at any one time. This design function is called "adaptive power control" and ensures that the base station operates at minimum, not maximum, power levels at all times.

Using the ARPANSA standard methodology, Telstra is required to complete and make available an EME report which predicts the maximum environmental EME level the facility will emit. Telstra has completed this EME report and it shows that the maximum level of EME emitted by the proposed facility is 0.30% (**Appendix D**). To better understand the information within this EME report, an ARPANSA published *A Guide to the Environmental EME Report* (**Appendix E**).

Amplitel and Telstra rely on the expert advice of national and international health authorities such as the ARPANSA and the WHO 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.

Telstra has strict procedures in place to ensure its mobile phones and base stations comply with these guidelines. Compliance with all applicable EME standards is part of Telstra's responsible approach to EME and mobile phone technology.

13.6 Social and Economic Impact

Reliable mobile phone coverage is important to ensure the economic growth of communities. It is not expected to have any adverse social or economic impacts as a result of the development. Indeed, it is anticipated that there would be positive impacts because of the mobile telephone coverage, and the proposed facility could also be utilised in the event of an emergency with reference to mobile phone and internet use.

The proposed development is essential to enable Carriers to remain competitive and increase the choice of mobile telephone services for consumers. Additional competition in the market will have economic benefits for individual consumers and the community as a whole. The development is consistent, with the objectives of the *Telecommunications Act 1997*, namely:

- To promote "the efficiency and international competitiveness of the Australian telecommunications industry" (s.3 (1)); and
- To ensure that telecommunications services "*are supplied as efficiently and economically as practicable*" (s.3 (2) (a) (ii).

14.0 CONCLUSION

This application is a direct result of the community's request for reliable telecommunications to be provided to the Yelbeni area. There is strong State policy support for telecommunications facilities if, when balancing improved telecommunications services with environmental impacts; including for example, visual impact and flood or fire hazard, a particular proposal provides a net community benefit.

The proposed works provide the community with reliable 4G and 5G access which in turn supports the various residential customers and tourists along with rural uses in the area. This also forms part of a wider plan to ensure reliable and accessible coverage during emergency situations such as in the event of bush fires or any other natural disaster.

Ventia on behalf of Telstra and Amplitel has undertaken an assessment of the relevant matters as required by the *Telecommunications Act 1997*, State Legislation and the *Shire of Trayning Local Planning Scheme No. 1*. The proposal is considered appropriate in light of the relevant legislative, environmental, technical, radio coverage and public safety requirements.

The proposed development is considered appropriate for the subject site for the following reasons:

- The proposed works will provide reliable mobile phone service to Yelbeni. The improved coverage is increasing access to new technologies for key regional sectors and communities, which rely on a fast, reliable and affordable mobile network.
- The proposal will not significantly encroach on views looking on towards the proposal from the nearest residences.
- The proposal will not detract from the heritage significance of heritage items within Yelbeni identified in this report.
- The proposal is in no proximity to community sensitive points of interest such as schools, childcare centres and healthcare premises.
- The proposal will mitigate visual impacts through various design measures employed, relating to the material and colours used, along with the size and positioning of facilities without compromising the proposal's structure and coverage objectives.
- The proposal is consistent with the relevant provisions of the *Shire of Trayning Local Planning Scheme No. 1* or presents only minor conflicts with them.
- The proposal will improve Telstra 4G and 5G communications services to the area, including voice calls, video calling and Wireless Broadband, and allow or other Carriers to provide similar services.
- The proposal will not affect the existing site or adjacent sites landuses or their potential to be developed or redeveloped.
- Emissions from the proposed facility will be significantly below the Australian Radiation Protection and Nuclear Safety Agency standards adopted by the Australian Communications and Media Authority.

The assessment of the proposal demonstrates that the proposal represents sound and proper town planning and it is respectively requested that consent is granted for this development application.

Should the Council have any further queries regarding the subject application, please do not hesitate to contact the nominated representative outlined within this document.

APPENDIX A – PLANS OF THE PROPOSAL

APPENDIX B – CERTIFICATES OF TITLE

APPENDIX C – ENVIRONMENTAL ANALYSIS REPORT

APPENDIX D – EME REPORT

APPENDIX E – GUIDE TO EME REPORT