



STATEMENT OF ENVIRONMENTAL EFFECTS

Telecommunications Facility

Lot 155 in DP750851

54 Windamere Road, GRONG GRONG NSW 2652

15 April 2024



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1 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Statement of Environmental Effects (SEE) has been prepared by Field Solutions Group (FSG) to accompany a development application for a proposed telecommunications facility at 54 Windamere Road, Grong Grong, further described as Lot 155 in DP750851.

The subject land is located in the RU1 – Primary Production zone and is vacant land partly used for agricultural purposes.

The applicant, Field Solutions Group, provides wireless broadband internet and mobile network services to regional and remote areas across Australia. The proposal is for a 45m telecommunications tower and associated infrastructure for both wireless broadband internet and mobile network services funded under Round 1 of the Federal Government’s Regional Connectivity Program.

In accordance with Section 2.142 of the *State Environmental Planning Policy (Transport & Infrastructure) 2021* (ISEPP), a telecommunications facility is permissible on any land with consent.

This SEE will address the Narrandera Local Environmental Plan 2013, Narrandera Development Control Plan 2013, the NSW Telecommunications Facilities Guidelines and Mobile Phone Base Station Deployment Industry Code. The SEE will also address any impacts as a result of the development.

We have set out below details of the proposal and pertinent matters in summary.

1.2 SUMMARY

Table 1: Summary

Address of Subject Land	54 Windamere Road, Grong Grong NSW 2652
Real Property Description	Lot 155 in DP750851
Area of Subject Land	Approximately 187 hectares
Zone	RU1 – Primary Production
Overlays	Biodiversity Riparian Lands and Watercourse Map Terrestrial Biodiversity Map
Name of Landowner	Mark Nicholas Ivanoff Nicole Maree Ivanoff



2 SITE LOCATION AND DESCRIPTION

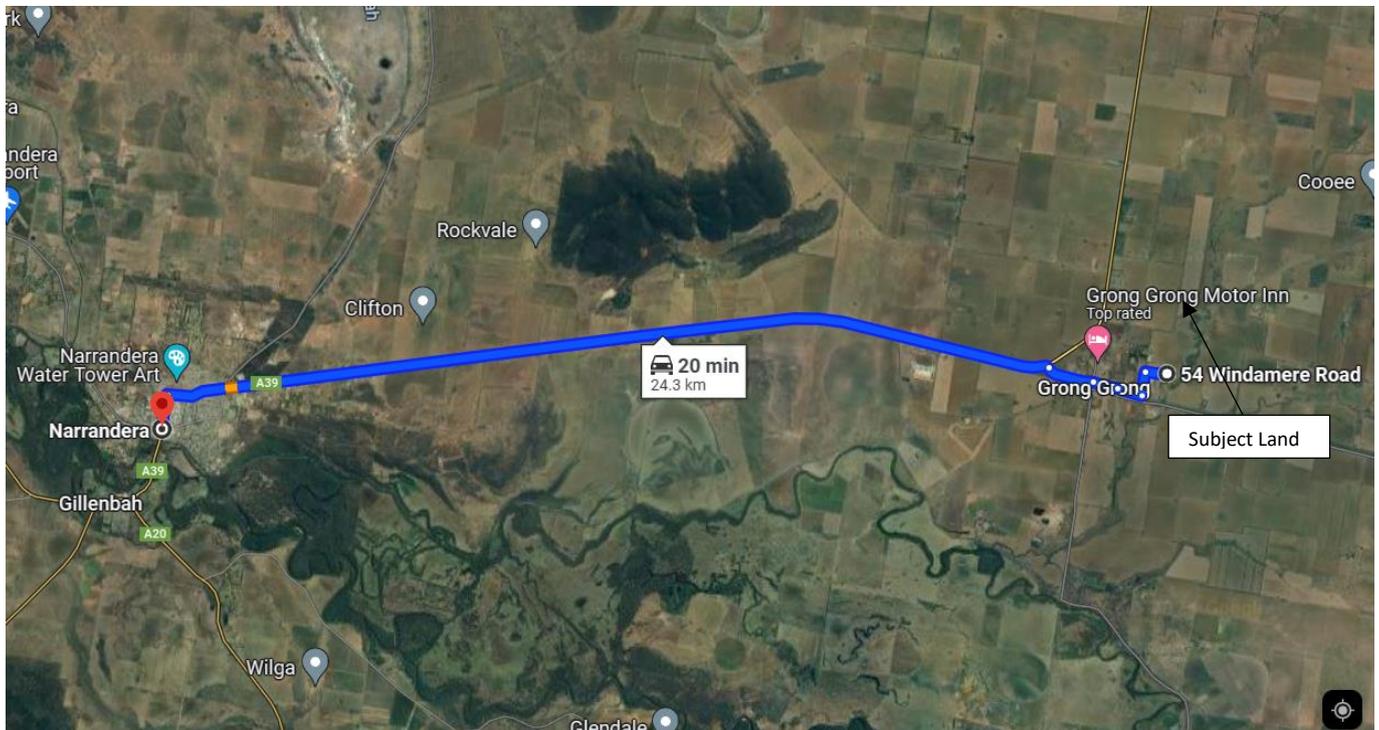
The subject land, being Lot 155 in DP750851, is located at 54 Windamere Road, Grong Grong and is approximately 24.3km east of Narrandera as shown in Figure 1 below.

The subject land is identified as being located within the RU1 – Primary Production zone and is vacant land partly used for agricultural purposes.

The site has a frontage to Windamere Road which is a 6m wide gravel road with gravel shoulders. Vehicular access to the property is provided via an existing all-weather gravel road from the unnamed road reserve.

Surrounding land uses are rural in nature.

Figure 1: Site Location



Source | Google Maps



Figure 3: Aerial Photo



Source | QLD Globe

3 PROPOSED DEVELOPMENT

It is proposed to obtain development consent for a telecommunications facility to be located on the subject land. The attached FSG Design Drawings depict the proposed development and also show setbacks to each boundary. The drawings are labelled “DRAFT” and can be relied upon for assessment.

The location of the proposed telecommunications facility is pre-determined using transmission calculations from other tower locations within the network. This site is crucial for transmission to other towers downstream and there is no other location that would be suitable.

3.1 PROPOSED TELECOMMUNICATIONS FACILITY

The proposed development is for a telecommunications facility consisting of:

- 45m high telecommunications tower
- FSG antennas and radiocommunications equipment
- Third party antennas and radiocommunications equipment
- Outdoor ground equipment cabinets
- Security fencing
- Grid system power supply

During construction, the components of the tower, fencing and other items will be delivered on a heavy rigid or articulated vehicle. Minor scouring of the site and excavation for footings will be required prior to a concrete base and footings being poured. The tower will then be constructed and fencing and other infrastructure put in place to secure the facility once construction is complete.

Figure 4: Example of Proposed Telecommunications Facility





Figure 5: Example of a 4-Bay Outdoor Ground Equipment Cabinet



3.2 ACCESS, TRAFFIC AND PARKING

The site has a frontage to Windamere Road which is a 6m wide gravel road with gravel shoulders. Vehicular access to the property is provided via an existing all-weather gravel road from the unnamed road reserve.

Internal manoeuvring on the site will allow for all vehicles to enter and leave the premises in a forward gear.

Access to the site by the applicant will be infrequent and will be required for initial construction and then approximately once a year for maintenance. It is expected that the maximum vehicle size visiting the site will be a medium rigid vehicle.

It is not proposed to formalise parking spaces given the infrequent access required to the site.

3.3 SERVICES

The telecommunications tower does not have a large footprint and does not create stormwater runoff. Given the tower will be surrounded by a pervious surface, a stormwater management plan has not been prepared.

During construction, erosion and sediment control measures will be used.

The telecommunications tower does not need to be connected to a water supply or require effluent disposal.

Electricity will be provided by way of connecting to the grid system.

Figure 6: Access to Facility



3.4 LANDSCAPING

Given the rural nature of the area, it is not proposed to provide additional landscaping.

3.5 WASTE

Once construction is complete, the telecommunications facility will not generate waste and it is not proposed to provide bins.

All construction waste will be removed from the site by contractors.

3.6 BIODIVERSITY & WATERWAYS

The subject land is affected by the Biodiversity Values Map, Terrestrial Biodiversity Map and the Riparian Lands and Watercourses Map as shown in Figure 6, 7 & 8 below. The dotted line shows the access path, and the dot represents the proposed telecommunications facility location.

Figure 7: Biodiversity Values Map

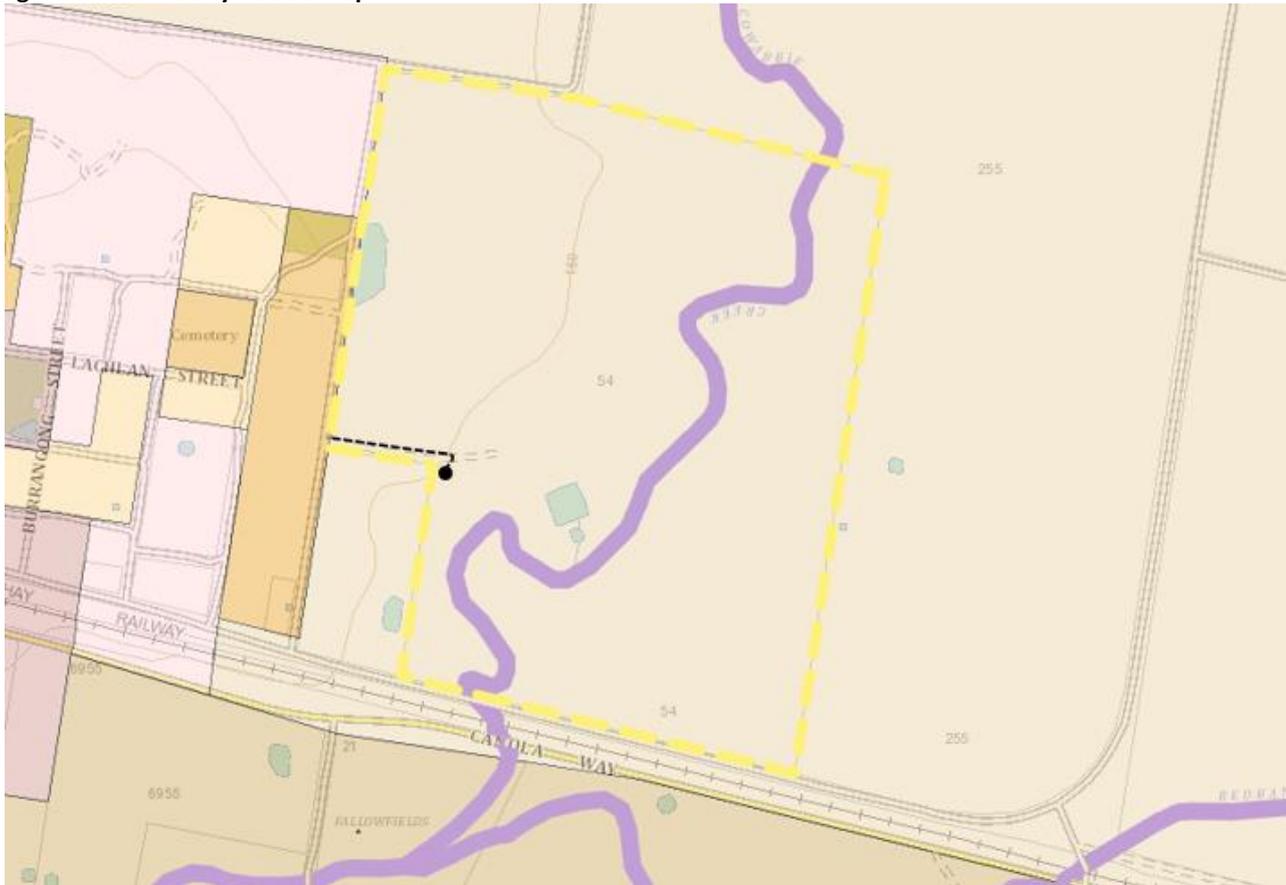


Figure 8: Terrestrial Biodiversity Map



Section 6.4 of the Narrandera Local Environmental Plan 2013 requires maintenance of the terrestrial biodiversity by:

- protecting native fauna and flora, and
- protecting the ecological processes necessary for their continued existence, and
- encouraging the conservation and recovery of native fauna and flora and their habitats.

The proposed development is located approximately 420m from the terrestrial biodiversity overlay. The proposed facility location is on cleared land and no vegetation removal will be required to construct the facility. The site is accessed by an existing access track. Figure 8 below shows the typical vegetation in the immediate area.

Figure 9: Vegetation in the Immediate Area



Figure 10: Riparian Lands and Watercourse Map



Section 6.6 of the Narrandera Local Environmental Plan 2013 requires protection and maintenance of

- Water quality within watercourses,
- The stability of the bed and banks of watercourses,
- Aquatic and riparian habitats,
- Ecological processes within watercourses and riparian areas.

As seen above, there is a watercourse running through the site, to the East of the proposed telecommunications facility location. The closest point of the watercourse to the facility location is 150m.

Given the distances and the surrounding pervious surface, it is not expected that the proposed development will have any impacts on the watercourses.



4 LEGISLATIVE MATTERS

4.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The *Environmental Planning & Assessment Act 1979* (EP&A Act) is the overriding legislation for this proposal.

In particular, Clause 4.15 of the EP&A Act has been addressed in this SEE.

The proposed development is consistent with the intent of the EP&A Act.

4.2 STATE ENVIRONMENTAL PLANNING POLICIES

State Environmental Planning Policies relevant to the proposed development have been address below:

4.2.1 STATE ENVIRONMENTAL PLANNING POLICY (TRANSPORT & INFRASTRUCTURE) 2021

The aim of the *State Environmental Planning Policy (Transport & Infrastructure) 2021* (ISEPP) is to facilitate the effective delivery of infrastructure across the State in the following ways, by:

- (a) *improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and*
- (b) *providing greater flexibility in the location of infrastructure and service facilities, and*
- (c) *allowing for the efficient development, redevelopment or disposal of surplus government owned land, and*
- (d) *identifying the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development), and*
- (e) *identifying matters to be considered in the assessment of development adjacent to particular types of infrastructure development, and*
- (f) *providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing, and*
- (g) *providing opportunities for infrastructure to demonstrate good design outcomes.*

The proposed development for a telecommunications facility is consistent with the effective delivery of infrastructure by providing connectivity to a regional area of the state.

Section 2.143 of the ISEPP states that:

- (1) *Development for the purposes of telecommunications facilities, other than development in section 2.141 or development that is exempt development under section 2.20 or 2.144, may be carried out by any person with consent on any land.*
- (2) *Before determining a development application for development to which this section applies, the consent authority must take into consideration any guidelines concerning site selection, design, construction or operating principles for telecommunications facilities that are issued by the Planning Secretary for the purposes of this section and published in the Gazette.*



The *NSW Telecommunications Facilities Guideline Including Broadband – October 2022* (the Guideline) provides a guide to the state wide planning provisions and development controls for telecommunications facilities in NSW. The Guideline is addressed in Section 4.6 of this report.

The *Mobile Phone Base Station Deployment Industry Code C564:2020* (the Code) is designed to:

- *allow the community and councils to have greater participation in decisions made by Carriers when deploying mobile phone base stations; and*
- *provide greater transparency to local community and councils when a Carrier is planning, selecting sites for, installing and operating Mobile Phone Radiocommunications Infrastructure.*

The relevant provisions of the Code are addressed in Section 4.7 of this report which shows Narrandera Shire Council, as a stakeholder, has been consulted with in regard to site selection and community concerns.

Therefore, the proposed telecommunications facility is consistent with Section 2.143 of the ISEPP by addressing any guidelines or codes that Council may consider.

4.3 RIVERINA MURRAY REGIONAL PLAN 2041

The *Riverina Murray Regional Plan 2041* encompasses a vision, goals and actions focused towards delivering new and diversified opportunities in the years ahead for those who live, work and visit this region.

The proposal is consistent with the Regional Plan by delivering network connectivity to regional areas.

4.4 NARRANDERA LOCAL ENVIRONMENTAL PLAN 2013

The *Narrandera Local Environmental Plan 2013* (NLEP) outlines the provisions that apply within the Narrandera local government area. The relevant provisions of the NLEP are addressed below.

4.4.1 ZONE OBJECTIVES

The subject land is located in the RU1 – Primary Production zone in the NLEP as shown in Figure 5 below.

The objectives of the zone are:

- *To encourage sustainable primary industry production by maintaining and enhancing the natural resource base.*
- *To encourage diversity in primary industry enterprises and systems appropriate for the area.*
- *To minimise the fragmentation and alienation of resource lands.*
- *To minimise conflict between land uses within this zone and land uses within adjoining zones.*

Figure 11: Land Use Zone



While the proposed telecommunications facility is not necessary consistent with the objectives of the zone, the proposal satisfies a community need by providing wireless broadband and mobile phone connectivity and services to the surrounding area.

Item 4 of Land Use Table Zone RU1 Primary Production of the NLEP states that any other development not specified in Items 2 and 3 is prohibited. A telecommunications facility is not listed in Items 2 and 3 however Section 2.143 of the ISEPP allows a telecommunications facility to be carried out on any land with consent.

4.4.2 HEIGHT OF BUILDINGS

The NLEP has not adopted any provisions in relation to height of buildings.

4.4.3 FLOOR SPACE RATIO

The NLEP has not adopted any provisions in relation to floor space ratio.

4.5 NARRANDERA DEVELOPMENT CONTROL PLAN 2013

The *Narrandera Development Control Plan 2013* (NDCP) provides additional planning provisions for the Narrandera Local Government Area and is subject to the provisions of the *Narrandera Local Environmental Plan 2013*.



The proposed telecommunications facility is consistent with the objectives in that the facility is proposed outside of any agricultural uses on the property, the use is unlikely to impact on the rural nature of the subject land and does not fragment the existing land use. The development will not interfere with the natural environment by avoiding any clearing.

4.6 NSW TELECOMMUNICATIONS FACILITIES GUIDELINE INCLUDING BROADBAND

Section 2.143(2) of the ISEPP requires that the consenting authority must take into consideration any guidelines concerning site selection, design, construction or operating principles for telecommunications facilities.

The *NSW Telecommunications Facilities Guideline Including Broadband – October 2022* (the Guideline) provides a guide to the state-wide planning provisions and development controls for telecommunications facilities in NSW. The Guideline is addressed in the table below.

Table 2: NSW Telecommunications Facilities Guideline Including Broadband

Control	Solution
Principle 1: A telecommunications facility is to be designed and sited to minimise visual impact.	
(a) As far as practical, integrate a telecommunications facility that is mounted on an existing building or structure with the design and appearance of the building or structure	Not applicable – the facility is not being mounted on an existing building or structure.
(b) The visual impact of telecommunications facilities should be minimised, visual clutter is to be reduced particularly on tops of buildings, and their physical dimensions (including support mounts) should be sympathetic to the scale and height of the building to which it is to be attached, and sympathetic to adjacent buildings.	Not applicable – the facility is not being mounted on an existing building or structure.
(c) If a telecommunications facility protrudes from a building or structure and is predominantly seen against the sky, either match the prevailing colour of the host building or structure or use a neutral colour such as pale grey	Not applicable – the facility is not being mounted on an existing building or structure.
(d) Where possible and practical, screen or house ancillary facilities using the same colour as the prevailing background and consider using existing vegetation or new landscaping.	The facility will be contained within surrounding fencing. It is not practicable to use the same colour as the prevailing background however the facility will be a light grey metal colour.
e) Locate and design a telecommunications facility in a way that responds to its setting (rural, residential, industrial or commercial).	Sites for telecommunications facilities are chosen for elevation, distance to other towers and ease of access. There were no alternative locations for the facility.



(f) Site and design a telecommunications facility located on or adjacent to a listed heritage item or within a heritage conservation area with external colours, finishes and scale sympathetic to the heritage item or conservation area.	Not applicable – not near a heritage item or place.
(g) Locate telecommunications facilities to minimise or avoid obstructing significant views of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land.	Not applicable – not near a heritage item or place, a landmark or streetscape, vista or panorama.
(h) Consult with relevant council when proposing pruning, lopping or removing any tree or vegetation. Obtain a tree preservation order, permit or development consent if required.	It is not proposed to clear, remove, lop or prune any trees as part of this development.
(i) Remove redundant telecommunications facilities and restore the site to the condition it was in prior to the facility's construction.	Not applicable.
(j) Remove redundant components of existing facilities after upgrades	Not applicable.
(k) Where possible, consolidate telecommunications facilities to reduce visual clutter and work with other users on co-location sites to minimise cumulative visual impact.	There were no opportunities to co-locate on an existing structure.
(l) Accord with all relevant industry design guides when siting and designing telecommunications facilities.	The siting and design of the facility is in accordance with industry guidelines.
(m) Assess potential visual impact in alternative site assessments.	Not applicable.
Principle 2: Telecommunications facilities should be co-located wherever practical.	
(a) As far as practical, locate telecommunications lines underground or within an existing underground conduit or duct.	Not applicable – the facility is wireless.
(b) Where practical, co-locate or attach overhead lines, antennas and ancillary telecommunications facilities to existing buildings, public utility structures,	There were no opportunities to co-locate on an existing structure.



poles, towers or other radiocommunications equipment to minimise clutter.	
c) Consider extending an existing tower as a practical co-location solution to new towers.	Not applicable.
(d) Demonstrate that co-location is not practicable if choosing not to co-locate a facility.	The facility is not able to be co-located in this case as discussed in (b) above.
(f) If choosing to co-locate, design, install and operate a telecommunications facility so that resultant cumulative levels of radio frequency emissions are within the maximum human exposure levels set out in RPS S-1.	Not applicable – not for co-location purposes.

Principle 3: Health standards for exposure to radio emissions will be met.

(a) Design, install and operate a telecommunications facility so that maximum human exposure levels to radiofrequency emissions comply with RPS S-1 (see Appendix C).	The facility has been designed to comply well within the mandated safety standards as set out by the Australian Radiation Protection & Nuclear Safety Agency (ARPANSA) for EME exposure to the general public.
(b) Using the format required by ARPANSA, report on predicted levels of EME surrounding any development covered by the Industry Code C564:2020 Mobile Phone Base Station Deployment, and how the development will comply with ACMA safety limits and RPS S-1.	An EME report has been produced to demonstrate the cumulative and maximum exposure limits in accordance with the ARPANSA format and the mandated safety standard.

Principle 4: Minimise disturbance and risk, and maximise compliance

(a) Ensure the siting and height of a telecommunications facility complies with the of the Commonwealth Civil Aviation Regulations 1998 and Airports (Protection of Airspace) Regulations 1996. Avoid penetrating any obstacle limitation surface (OLS) shown on a relevant OLS plan for an aerodrome or airport (as reported to the Civil Aviation Safety Authority) within 30 km of the proposed development.	CASA has been consulted with respect to this telecommunications facility and there were no requirements.
(b) Ensure no adverse radio frequency interference with any airport, port or Commonwealth defence navigational or communications equipment, including the Morundah Communication Facility, Riverina	Airservices Australia was consulted with respect to this telecommunications facility and there were no requirements.



<p>c) Carry out the telecommunications facility and ancillary facilities in accordance with any manufacturer's installation specifications.</p>	<p>The telecommunications facility will be carried out in accordance with manufacturer's specifications.</p>
<p>(d) Protect the structural integrity of any building or structure on which a telecommunications facility is erected.</p>	<p>Not applicable – the facility will not be attached to a building.</p>
<p>(e) Erect the telecommunications facility wholly within the boundaries of a property as approved by the relevant landowner.</p>	<p>The facility will be located wholly within the subject lot.</p>
<p>(f) Ensure all construction of a telecommunications facility accords with Managing Urban Stormwater: Soils and Construction – Volume 1 (Landcom 2004), or its replacement.</p>	<p>Construction will be carried out in accordance with all guidelines.</p>
<p>(g) Mitigate obstruction or risks to pedestrians or vehicles caused by the location of the facility, construction activity or materials used in construction.</p>	<p>All mitigation measures will be adhered to during construction.</p>
<p>(h) Where practical, carry out work at times that minimise disruption to adjoining properties and public access and restrict hours of work to 7.00am and 5.00pm, Mondays to Saturdays, with no work on Sundays and public holidays</p>	<p>Hours of work will be adhered to.</p>
<p>(i) Employ traffic control measures during construction in accordance with Australian Standard AS1742.3-2002 Manual of uniform traffic control devices – Part 3: Traffic control devices for works on roads.</p>	<p>Traffic control measures will be carried out in accordance with the AS, if required.</p>
<p>(j) Guard open trenching in accordance with Australian Standard Section 93.080 – Road Engineering AS1165 – 1982 – Traffic hazard warning lamps</p>	<p>Any open trenching will be carried out in accordance with the AS.</p>
<p>(k) Minimise disturbance to flora and fauna and restore land to a condition similar to its condition before the work was carried out.</p>	<p>It is not proposed to clear any vegetation as part of this development and disturbance will be kept to a minimum and avoided if possible.</p>
<p>(l) Identify any potential impacts on threatened species and communities in consultation with relevant authorities and avoid disturbance to identified species and communities where possible.</p>	<p>The subject land has not been identified as having threatened species or communities.</p>



(m) Identify the likelihood of harming an Aboriginal place and/or Aboriginal object and obtain approval from the Department of Premier and Cabinet if the impact is likely, or Aboriginal objects are found.	The site has not been identified as an Aboriginal Place or containing an Aboriginal object however the applicant is aware of their obligations if any artefacts are found.
n) Reinstate, at your expense, street furniture, paving or other facilities removed or damaged during construction to at least the same condition as that prior to installation	There is no street furniture, paving or other existing facilities in the vicinity of the proposed facility.

4.7 MOBILE PHONE BASE STATION DEPLOYMENT INDUSTRY CODE

The *Mobile Phone Base Station Deployment Industry Code C564:2020* (the Code) is designed to:

- *allow the community and councils to have greater participation in decisions made by Carriers when deploying mobile phone base stations; and*
- *provide greater transparency to local community and councils when a Carrier is planning, selecting sites for, installing and operating Mobile Phone Radiocommunications Infrastructure.*

The relevant provisions of the Code are addressed below:

Table 3: Mobile Phone Base Station Deployment Industry Code C564:2020 objectives

Objective	Solution
(a) to apply a Precautionary Principle to the deployment of Mobile Phone Radiocommunications Infrastructure;	The precautionary principle has been applied in this case to ensure the best outcome for all stakeholders in terms of facility design, site selection, planning, community concerns and environmental concerns.
(b) to provide best practice processes for demonstrating compliance with relevant exposure limits and the protection of the public;	An EME report demonstrates compliance with the ARPANSA safety standard for general public exposure limits.
(c) to ensure that the exposure of the community to EME is minimised;	The facility has been designed to operate well within ARPANSA safety standard for radio frequency exposure.
(d) to ensure relevant stakeholders are informed, notified or consulted and engaged with before Mobile Phone Radiocommunications Infrastructure is constructed;	Consultation has been held with Narrandera Shire Council which resulted in positive feedback due to the benefit to the community of reliable wireless broadband and mobile network. Any relevant stakeholders such as adjoining landowners will be notified during the public notification stage of the development application.
(e) to specify standards for consultation, information availability and presentation;	General information relating to this proposal is available for members of the public on the Radio Frequency National Site Archive (RFNSA) website (www.rfnsa.com.au). As the proposal requires Council determination, notification and consultation



	<p>with relevant stakeholders will be undertaken by Council during the public notification period as part of the development application.</p>
<p>(f) to consider the impact on the wellbeing of the community, physical or otherwise, of Mobile Phone Radiocommunications Infrastructure; and</p>	<p>The proposed location for the facility has been selected to ensure that both coverage objectives are achieved whilst also carefully considering and balancing the appropriateness and proximity to community sensitive locations. The EME report demonstrates the applicant's responsible approach to deployment and the extremely low levels of radio frequency exposure to the general public based on the ARPANSA safety standard.</p> <p>The facility is designed to improve and provide reliable wireless broadband and mobile services to the surrounding community and, as a result, it is expected to have a positive impact on social and economic activity.</p>
<p>(g) to ensure Council and community views are incorporated into the Mobile Phone Radiocommunications Infrastructure site selection.</p>	<p>Sites for telecommunications facilities are chosen for elevation, distance to other towers and ease of access. During the site selection process, Narrandera Shire Council's requirements were also taken into account in terms of zone objectives, environmental considerations, visual amenity and emissions. It has been shown that, on balance, the site for the telecommunications facility is appropriately located.</p>



5 POTENTIAL IMPACTS

Pursuant to section 4.15(1)(b) of the EP&A Act, addressed below are the likely impacts of the development on the environment and any social or economic impacts.

5.1 ENVIRONMENTAL IMPACTS

5.1.1 ACCESS AND TRAFFIC

The site has a frontage to Windamere Road which is a 6m wide gravel road with gravel shoulders. Vehicular access to the property is provided via an existing all-weather gravel road from the unnamed road reserve. Internal manoeuvring on the site will allow for all vehicles to enter and leave the premises in a forward gear. Access to the site by the applicant will be infrequent and will be required for initial construction and then approximately once a year for maintenance. It is expected that the maximum vehicle size visiting the site will be a medium rigid vehicle.

It is not proposed to formalise parking spaces given the infrequent access required to the site.

During construction, the components of the tower, fencing and other items will be delivered on a heavy rigid or articulated vehicle. Minor scouring of the site and excavation for footings will be required prior to a concrete base and footings being poured. The tower will be constructed and then fencing and other infrastructure put in place. All vehicles will be able to be parked on the subject land without causing traffic delays.

Therefore, given the infrequent access to the site, it is not expected that there will be an impact to traffic or the safety and efficiency of the road.

5.1.2 EMISSIONS, NOISE AND VIBRATION

The telecommunications towers use line-of-site Microwave Tx technology delivering a wireless broadband network.

The antennas that form part of this proposal to be used for mobile phone and wireless broadband networks emit low level radio frequency and electromagnetic energy (EME). The EME report demonstrates that, for this proposal, the cumulative and maximum exposure limits are in accordance with the ARPANSA format and mandated safety standard.

The telecommunications towers do not emit noise or create vibration.

5.1.3 VISUAL IMPACTS

The nearest sensitive receptor is a dwelling house approximately 795m to the west of the proposed telecommunications facility located along Federal Park Road on Lot 65 on DP750851.

Another dwelling house is approximately 850m to the west also along Federal Park Road on Lot 93 in DP750851.

The surrounding vegetation as shown in Figure 8 reduces the visual impacts to neighbouring properties. Whilst it is possible that the tower may be visible to the nearest sensitive receptor, the benefit to the community far outweighs the minor visual impact.



5.1.4 FAUNA, FLORA AND WATERCOURSES

The subject land is affected by the Biodiversity Values Map, Terrestrial Biodiversity Map and the Riparian Lands and Watercourses Map as shown in Figure 6, 7 & 8.

There is a watercourse running through the site, to the East of the proposed telecommunications facility location. The closest point of the watercourse to the facility location is 150m.

Given the distances and the surrounding pervious surface, it is not expected that the proposed development will have any impacts on the watercourses.

The proposed development is located approximately 420m from the terrestrial biodiversity overlay. The proposed facility location is on cleared land and no vegetation removal will be required to construct the facility. The site is accessed by an existing access track. Figure 8 below shows the typical vegetation in the immediate area.

Therefore, it is not expected that the development will have an impact on fauna, flora or any watercourses.

Further detail is provided in Section 3.6 of this SEE.

5.1.5 FLOODING

The subject land has not been identified as being flood prone. We confirm that the proposed telecommunications tower is open on all sides and it is not expected that the development will impact on the flow of floodwaters.

5.1.6 BUSHFIRE

The subject land has not been identified on the Bushfire Prone Land map as being Bushfire Prone

5.1.7 WASTE

The proposed telecommunications facility does not generate waste.

Waste generated during construction will be disposed of by contractors.

5.2 SOCIAL IMPACTS

The proposed telecommunications facility is not expected to have any adverse social impacts given the community benefit from the wireless broadband network and mobile coverage that will be available to this regional area.

5.3 ECONOMIC IMPACTS

The proposed telecommunications facility is not expected to have any adverse economic impacts. In fact, the opposite is true in that wireless broadband and mobile coverage will be available to remote areas which will attract people and businesses moving to regional areas which will in turn strengthen the economy of the area.



6 SITE SUITABILITY

Pursuant to section 4.15(1)(c) of the EP&A Act, the suitability of the site for the development is addressed below.

Sites for telecommunications facilities are chosen for elevation, distance to other towers and ease of access.

The subject land is suitable for a telecommunications tower for the following reasons:

- The site has direct line of site to other proposed towers in the region;
- The site has good access and the development will not create a nuisance to traffic;
- The proposed development will not increase flood hazard;
- The proposed development will not increase bushfire hazard;
- The proposed development does not require vegetation clearing;
- The subject land has not been identified as containing heritage items or Aboriginal artefacts;
- The proposed facility will not interfere with agricultural land;
- The facility has been designed to comply well within the mandated safety standards set out by the Australian Radiation Protection & Nuclear Safety Agency (ARPANSA) for EME exposure to the general public; and
- Likely impacts are low.



7 PUBLIC INTEREST

Pursuant to section 4.15(1)(e) of the EP&A Act, we address public interest.

The development of a telecommunications facility which provides a wireless broadband network and mobile coverage to remote and regional areas in New South Wales are considered a community benefit and therefore will be in the interest of the public.



8 CONCLUSION

This Statement of Environmental Effects for a proposed telecommunications facility to be located at 54 Windamere Road, Grong Grong NSW 2652 has addressed all relevant legislation and in particular the requirements of Clause 4.15 of the *Environmental Planning & Assessment Act 1979* and Section 2.145 of the *State Environmental Planning Policy (Transport & Infrastructure) 2021*.

The proposal is for a telecommunications facility which will provide a mobile phone coverage and a wireless broadband network to a remote and regional community.

As discussed above, the proposed development will not result in any adverse environmental, social or economic impacts.

It has been shown that the proposed development is consistent with current legislation, provides a community benefit to a regional area and is in the interest of the public.

In view of the above, it would be appreciated if Council would consent to the proposed development.

Yours Sincerely

Angus Lovell | Town Planner