

21 July 2017

Construction Policy Team
Market Structure Branch
Department of Communications and the Arts
GPO Box 2154
CANBERRA ACT 2601

Dear Sir/Madam,

RE: Submission to Possible Amendments to Telecommunications Carrier Powers and Immunities

Thank you for inviting feedback on proposals from telecommunications carriers to amend the *Telecommunications (Low-impact Facilities) Determination 1997*, the *Telecommunications Code of Practice 1997* and potentially Schedule 3 to the *Telecommunications Act 1997*.

It is acknowledged that telecommunication services play an important role and that ready access to high-quality, reliable and affordable telecommunications services is sought by the community, business and government. These demands though should be balanced with other community values including the visual amenity of an area. In this context the following comments are provided:

Local Government Heritage Overlays – LIFD Part 2, 2.5(7A)

Planning Scheme's Heritage Overlays seek to protect not only heritage sites but also their settings, by ensuring uses and works do not erode the valued streetscape and the significance of their cultural heritage is retained. It is important therefore that telecommunication facilities be subject to planning scheme's heritage overlays to ensure structures are designed and sited to be sympathetic to these culturally important areas.

Maximum Heights of Antenna Protrusions on Buildings – LIFD Schedule, Part 1, Item 3

The current maximum height for antennas and their mounts of 3m should be maintained and not increased to 5m. The current maximum height is considered relatively generous and increasing the allowable height is likely to adversely impact on streetscapes. This is particularly the case for Noosa, where the maximum height of buildings is predominantly 8m and there is a conscious effort to ensure buildings and structures do not dominate the landscape and respect the scale of vegetation.

Tower Extensions in Commercial Areas – LIFD Schedule, Part 1, Item 9

Currently limited towers are approved in commercial areas in Noosa and where approved the tower's height is an important consideration in determining the acceptability or otherwise of the tower's location. Existing approved towers in commercial areas in Noosa are relatively low rise reflective of the maximum building heights for the area and an extension of 5m to these heights is likely to result in the tower adversely impacting on the visual amenity

of the area and being significantly more visually obtrusive. Extension of tower heights of up to 5m should not be permitted as a low impact facility in commercial areas.

Radiocommunications Lens Antennas – LIFD Schedule, Part 1, Item 10

The proposed changes for radiocommunications lens antennas are acceptable where restricted to industrial and rural areas, given the potential bulk and protrusion of these structures.

Volume Restrictions on Co-located Facilities – LIFD Part q, Section 1.3 and Schedule, Part 7, Items 2 and 3

The current volume restriction on adding facilities to an existing facility is not acceptable for residential and commercial areas and should be maintained at 25% to ensure these structures do not impact on the visual amenity of these areas.

Should you require wish to discuss issues raised in this submission please contact me on the above telephone number.

Yours faithfully



Kerri Coyle
Manager, Development Assessment