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Additional Comments from Aurecon Planning on Deployment Code Review – Communications Alliance Industry Code DR C564:2018 Mobile Base Station Deployment – Draft for Public Comment

Section 3 – General Obligations on Carriers.

General comments:

Extremely helpful to have some definitive wording around timeframes, particularly in the instance of notices provided electronically.

Item 3.2.3 appears to be a repeat of item 3.2.1 (b)

Item 3.2.4 – does this item suggest that the only circumstance in which carriers must have regard to a school's holiday period is when the school is identified and an interested or Affected party?

Item 3.3.3 – would the responsibility of this record keeping remain with the consultancy (i.e. Aurecon) who undertook the notifications on behalf of the Carrier? Or is it the responsibility of the Carrier to retain their own records?

Section 4.2 - Mobile Phone Radio Communications Infrastructure Design

Item 4.2.3 (f) providing comment on costs is not a planning matter. Suggest delete this from the PAC.

Section 5 - Small Scale Infrastructure

General comment:

In the description preceding the items of this section, perhaps more justification around the inclusion of Fixed Radio Links can be given. Fixed Radio links (dish antennas) can vary greatly in size, and in some cases the size alone would impact upon their classification as small in scale. The old edition of the code included a note which specified that Fixed Links comprise Low RF Power infrastructure and required lesser notification on that basis.

Items 5.1.3 and 5.2.3 – could definitive wording or guideline be included to describe what is meant by "immediate vicinity"? (as included as a note in old code). Particularly given that this section will relate to rooftop/ building installations, including multi-storey residential apartments, not having an accepted (measurable) clarification could lead to inconsistencies.

Items 5.1.4 (a) and 5.2.5 (a) – requiring that carriers must explicitly detail the address AND the actual site position is definitely worthwhile for the understanding of community members and Councils.

Items 5.2.4 Notify community sensitive locations in the immediate (not close) vicinity of the site (like 5.2.3). Close is vague and immediate vicinity is considered suitable here, given it is noted in the Explanatory Statement such facilities have “minimal” visual impact.

6 - Consultation for new sites without DA

Item 6.2.4 Allow Council 15 business days for this first stage. 10 is considered too short from experience in dealing with Councils.

Item 6.3.5 directs the reader to Appendix D2.2 – this does not appear to have been included in the draft document.

Item 6.3.12 On site signage to be removed after the notice/consultation period is complete. From experience it is impractical to maintain such signage until site construction is complete.

Item 6.3.15 Give Councils 15 business days to provide comments. This is then consistent with 6.3.16 for IAP comments. Also, if Councils have 15 days for stage 1 notice, they shouldn't need a further 20 days for stage 2 comments.

7 - Notice for existing site no DA

Item 7.2 Public notification

Previously Newspaper notification. This has proven a very costly and time-consuming exercise, and it is considered doubtful that the public actually benefits from this notice. It has now been replaced by “Public Notification”. Note 1 leaves this form of notice open to discretion, including newspaper notice again. This could be seen as being a default option as it is probably quicker than the other suggested means. Suggest any other notice beyond 7.1 Council notice be limited to any IAP's who have previously responded to previous site notice, or if the site is historically red rated consider discretionary notice to previous IAP's if applicable, or if new IAPs identified since the site was built/first notified.

Item 7.2.2 – allowing Carriers a choice of multiple Public Notification methods so long as the chosen method “would reasonably assume any Interested and Affected Parties would be notified”. Perhaps this wording could be changed to “reasonably ensure”, which denotes slightly greater accountability for the Carriers.

It would also be prudent to include the need for Carriers to provide justification as to why the chosen Public Notification method was selected as a suitable method for the particular community. Greater clarity around the requirements for Carriers opting to use social media to notify the public is required to ensure that a consistent approach (and standard of approach) is employed.

Section 8

Item 8.1.3 – refers to Clause 9.1.1 – change to 8.1.1