
From: Marc Salver <msalver@ahc.sa.gov.au>
Sent: Friday, 21 July 2017 11:21 PM
To: powersandimmunities
Cc: Deryn Atkinson
Subject: Comments on the proposed amendments to the Telecommunications Carrier powers and immunities

Dear Sir/Madam,

I refer to the information out for public comments in relation to the above matter. Our Council appreciates the opportunity to provide comment in relation to the proposed amendments and provides the following comments:

1. The Adelaide Hills is a peri-urban Council located immediately east of Metropolitan Adelaide. It is a scenic hilly environment with over 50 localities and towns dotted across the landscape, with a population of just over 40,000. The main economic activities and drivers are primary production and tourism. There are 21 wineries and 40 cellar doors located within our Council area along with numerous other tourism attractions. Further, our Council together with 9 others, is pursuing World Heritage Status for its (agri)cultural landscapes within the Mount Lofty Ranges region. It is acknowledged that providing mobile phone and NBN coverage and services in such a scenic hilly environment can be a challenge, but is essential for economic growth and connectivity in the region. However, with these aforementioned aspects in mind, the key is to achieve a balance between providing such telecommunication services whilst maintaining the scenic landscape qualities which residents and tourists come to enjoy and appreciate.
2. Council has no concerns with the proposed changes to the Telecommunications (Low-impact Facilities) Determination (LIFD) 1997 which are intended to allow for the efficient and streamlined deployment of new types of network infrastructure, and to make changes to existing facilities. However, our development controls are such that any telecommunications towers in the rural Watershed (Primary Production) Zone which are 30 metres or more in height are what are defined as 'non-complying' forms of development. To avoid triggering this form of development, many telecommunications providers submit applications for towers of 29.9 metres in height. The issue at hand is therefore that any new low-impact infrastructure placed on such existing towers must not exceed the approved height of such towers. Doing so could potentially trigger the requirement for development approval and would be processed as a non-complying form of development. To avoid this potential complication, our Council seeks that this issue be picked up in the proposed changes to the LIFD.
3. Lastly, it is noted that the LIFD seeks to clarify the issue of radio shrouds which are employed to improve the appearance of mobile communications facilities. This is supported and it is considered that it should be extended to include other solutions where the aesthetics of mobile phone towers are enhanced to look like trees. This is something that our Council would encourage to ensure that mobile phone towers blend in to the scenic landscape of the Adelaide Hills.

It is hoped that the above suggestions are included in the proposed changes to the LIFD. Should you wish to discuss any of these matters, then please do not hesitate to contact me.

Yours sincerely,

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