

TOWN OF COTTESLOE

Tuesday, 12 November 2013



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PSA ref 3114

1 November 2013

Chief Executive Officer Town of Cottesloe PO Box 606 COTTESLOE WA 6911

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service

Attention: Andrew Jackson - Manager Development Services

Dear Sir

TELSTRA CORPORATION LIMITED – PROPOSAL TO INSTALL A MOBILE PHONE BASE STATION SITE NO: WA06998.01 SITE NAME: COTTESLOE RELOCATION SITE ADDRESS: LOT 4 (1) CONGDON STREET, COTTESLOE WA 6011

Planning Solutions acts on behalf of Service Stream Mobile Communications (SSMC) for its Client, Telstra Corporation Limited (Telstra) with respect to the deployment of sites for its 3rd and 4th generation mobile phone network.

We refer to the development application lodged on 3 May 2013 with the Town of Cottelsoe (Town) for the proposed moble phone base station on Lot 4 (1) Congdon Street, Cottesloe (subject site). Following the Town's refusal of the application on 2 July 2013, an application for review was lodged with the State Adminstrative Tribunal (SAT). As part of the SAT mediation process, Planning Solutions has been requested to submit amended plans and submission for the subject site for assessment by the Town.

The SAT mediation process also highlighted a potential option for the telecommunications infrastructure to be located on the adjacent Lot 1 (443) Stirling Highway, Cottesloe. Subsequent discussions have confirmed the landowner is unwilling to proceed with the planning application.

Therefore in order to progress, amended plans have been prepared for the subject site in accordance with the agreed actions arising from mediation. We enclose the requisite documentation as detailed below:

- 1. Three (3) sets of plans, to scale, including site locality and proposed layout, site plan with analysis of the site and site elevation;
- 2. Two photomontages, displaying the proposed telecommunications infrastructure.

The following submission will discuss various matters pertaining to the proposal, including:

- Introduction
- Proposal.
- Town planning considerations.

1 Introduction

The proposed telecommunications infrastructure will facilitate Telstra's high-speed NextG® mobile telephone network, which will see customers enjoying improved high quality content, wireless broadband access and further mobilisation of business applications. In selecting network base station sites, Telstra will endeavour to utilise existing mobile network sites as extensively as possible, or share other forms of existing infrastructure to build the network. In addition to the utilisation of existing infrastructure, the use of 'low-impact' facilities is the preferred solution, where possible, to achieve the network deployment. It is considered that this approach will lead to the least possible impact on the local environment and community.

Detailed investigations of the locality, including consultation with the owner of Lot 1 (443) Stitling Highway, Cottelsoe, revealed no other opportunities to co-locate telecommunications infrastructure which would satisfy the coverage objectives for the facility.

Site selection process has been influenced by the objective of avoiding community sensitive locations. The site selection process undertaken by Telstra, and the design of the facility proposed to achieve the network solutions required to obtain the necessary coverage, has incorporated the following considerations:

- Radio coverage objectives.
- Low-impact and co-location opportunities.
- Surrounding land uses.
- Planning, environmental and heritage considerations.
- Facility construction and treatments.

The proposal incorporates all of the above aspects and is the preferred choice in order to provide the necessary telecommunications infrastructure for the immediate locality.

2 Proposed telecomunication infrastructure

The facility proposed by Telstra involves the installation of new telecommunications infrastructure on the roof of an existing telephone exchange building and installation of ancillary cabling, access and safety equipment. Specifically, it is proposed to accommodate six (6) new Telstra panel antennas on mounting poles on the roof of the building on the subject site. In summary the proposed development consists of the following:

Prop	oosed Panel Antennas:	6
	Dimensions:	2 x 2494mm (h) x 353mm (w) x 209mm (d)
	Elevation:	10.00m above natural ground level
	Dimensions:	4 x 2494mm (h) x 353mm (w) x 209mm (d)
	Elevation:	13.00m 🕸 above natural ground level

The proposed facility is the most appropriate solution to facilitate Telstra's mobile telephone network in this locality, with minimum impact upon the amenity of the area.

Detailed plans and elevations depicting the subject proposal are attached (refer Appendix 1).

A photomontage depicting the proposed antenna structures is attached (refer Appendix 2).

3 Town planning considerations

3.1 Metropolitan Region Scheme

The subject of the Application for Approval to Commence Development, being approximately three quarters of the eastern portion of the subject site, is reserved 'Primary Regional Roads' under the provisions of the Metropolitan Region Scheme (MRS).

The balance of the subject site, being the western portion, is zoned 'Urban' under the MRS.

Given the long established use of the land, and minor nature of the structure the proposal is consistent with the MRS provisions and may be approved accordingly.

3.2 Town of Cottesloe Town Planning Scheme No 2

The subject site falls within the area covered by the Town of Cottesloe Town Planning Scheme No. 2 (**TPS2**). Notwithstanding, that part of the subject site incorporating the proposed infrastructure is reserved under the provisions of the MRS. Accordingly, that part of the site is not reserved or zoned by TPS2, and the provisions of the MRS apply to the reserve incorporating the subject site.

3.3 Cultural Heritage Significance

The subject site is not listed on the State Heritage Office Statutory Heritage Listing, but is included as an 'Other Heritage Listing - Municipal Inventory' with a Grading/Management Category of 'Retain and Conserve if Possible'. The State Heritage Council has acknowledged:

that the place P7830 Telephone Exchange (1 Congdon Street, Cottesloe) is not included in the State Register of Heritage Places, and we do not require a referral for any development of the place from the [City] of Cottesloe. The subject site is not listed on Schedule 1 – Places of Natural Beauty and Historic Buildings and Objects of Historical or Scientific Interest of TPS2, nor included in Clause 6 - Heritage Places of Town of Cottesloe Policy No. TPSP 012 (**TPSP012**), however the building is listed on the Town of Cottesloe Municipal Inventory as a Category 3 Building. The Town's website provides the following;

Buildings in Categories 3, 5 and 6 of the Municipal Inventory may be demolished with the approval of the Manager of Development Services acting under delegated authority from Council. They are treated no differently to any other residential dwelling in this regard. As is the case with all buildings, development approval is required for any proposed alterations or additions.

The proposed facility will result in minimal alteration to, or impact on, the existing building. Cabling and associated ancillary equipment will be completely contained within the existing building. The proposed antennas. The proposed telecommunications infrastructure provides an addition to the existing building, in keeping with its original intended and continued use.

Accordingly, the impact on the heritage significance of the building and the visual amenity of the locality by the proposed infrastructure will be minimal.

4 Conclusion

The proposal presented is permissible under the provisions of the Metropolitan Region Scheme and the Town of Cottesloe Town Planning Scheme No. 2 and is consistent with the objectives and provisions of the applicable statutory planning instruments.

The proposal is consistent with the principles of orderly and proper planning as outlined in preceding sections.

In summary, the proposal is justified for the following reasons:

- The proposed development is consistent with the provisions of the Metropolitan Region Scheme;
- 2 The proposed development is consistent with the provisions of the Town of Cottesloe Town Planning Scheme No. 2;
- 3 The infrastructure associated with the telecommunications facility will be contained within the existing site, and will not impact on the heritage significance of the existing building;
- 4 The subject site has historically, and is currently, utilised for telecommunications purposes. The proposed development represents a continuation of the long-standing use of the site; and
- 5 Works associated with the development are minor, and are not anticipated to detrimentally affect the amenity of the area.

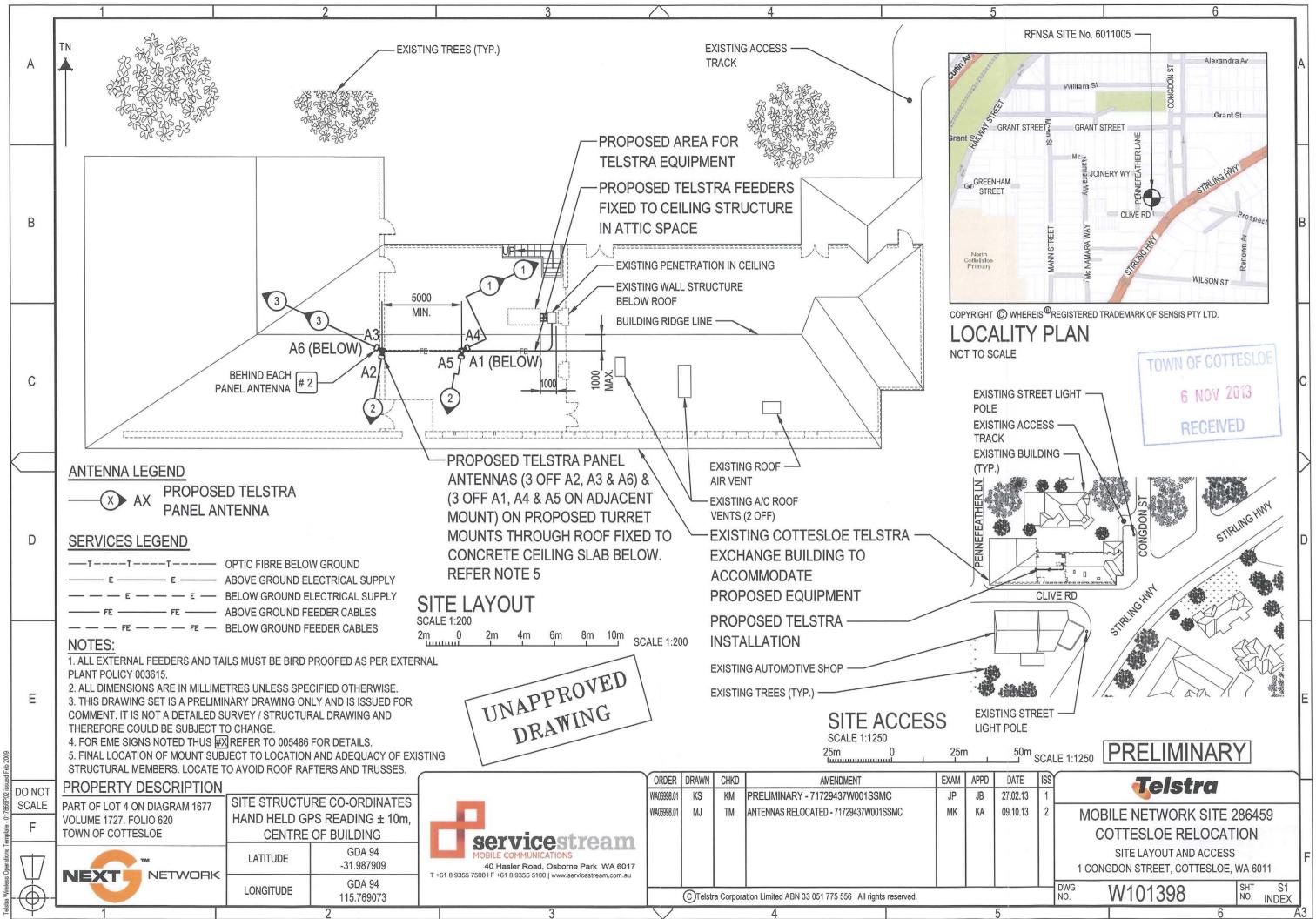
The proposal is consistent with planning principles derived from state and local levels, and given the minimal impact on the amenity of the area and the locality generally, the application warrants support from the Town of Cottesloe. In light of the proposal's demonstrated compliance with the applicable statutory planning instruments, the Town is respectfully requested to approve the subject application. We trust that the information contained is sufficient for you to favourably determine the application. However, should you require any additional information or wish to discuss this matter further then please do not hesitate to contact me via phone on 08 9227 7970 or via email on <u>admin@planningsolutions.com.au</u>

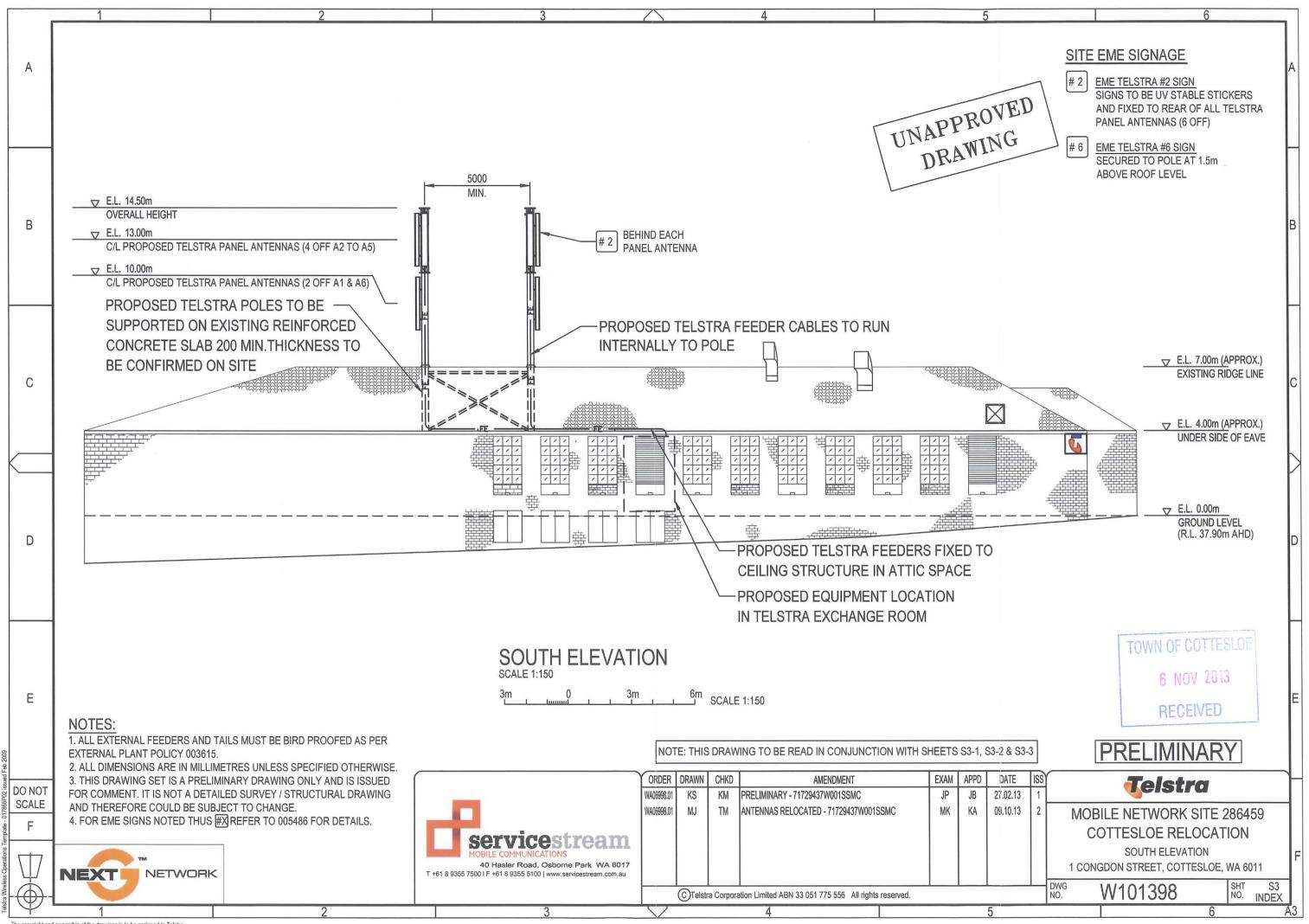
Yours sincerely,

80 **BEN DOYLE**

DIRECTOR

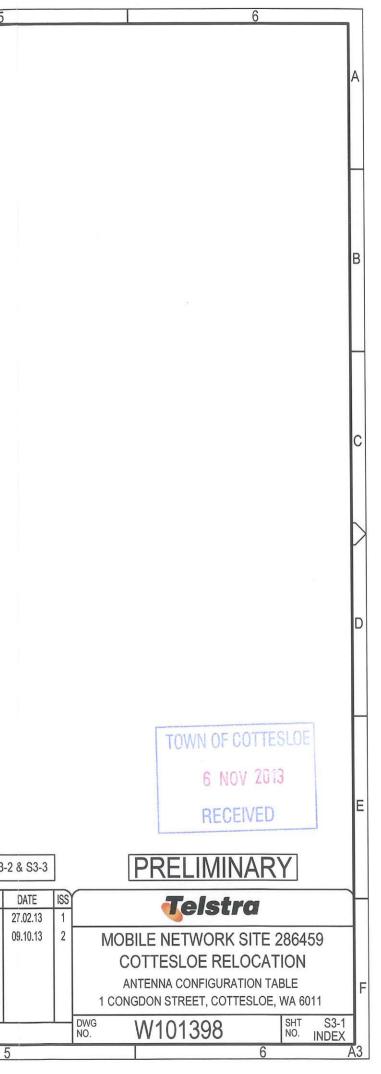
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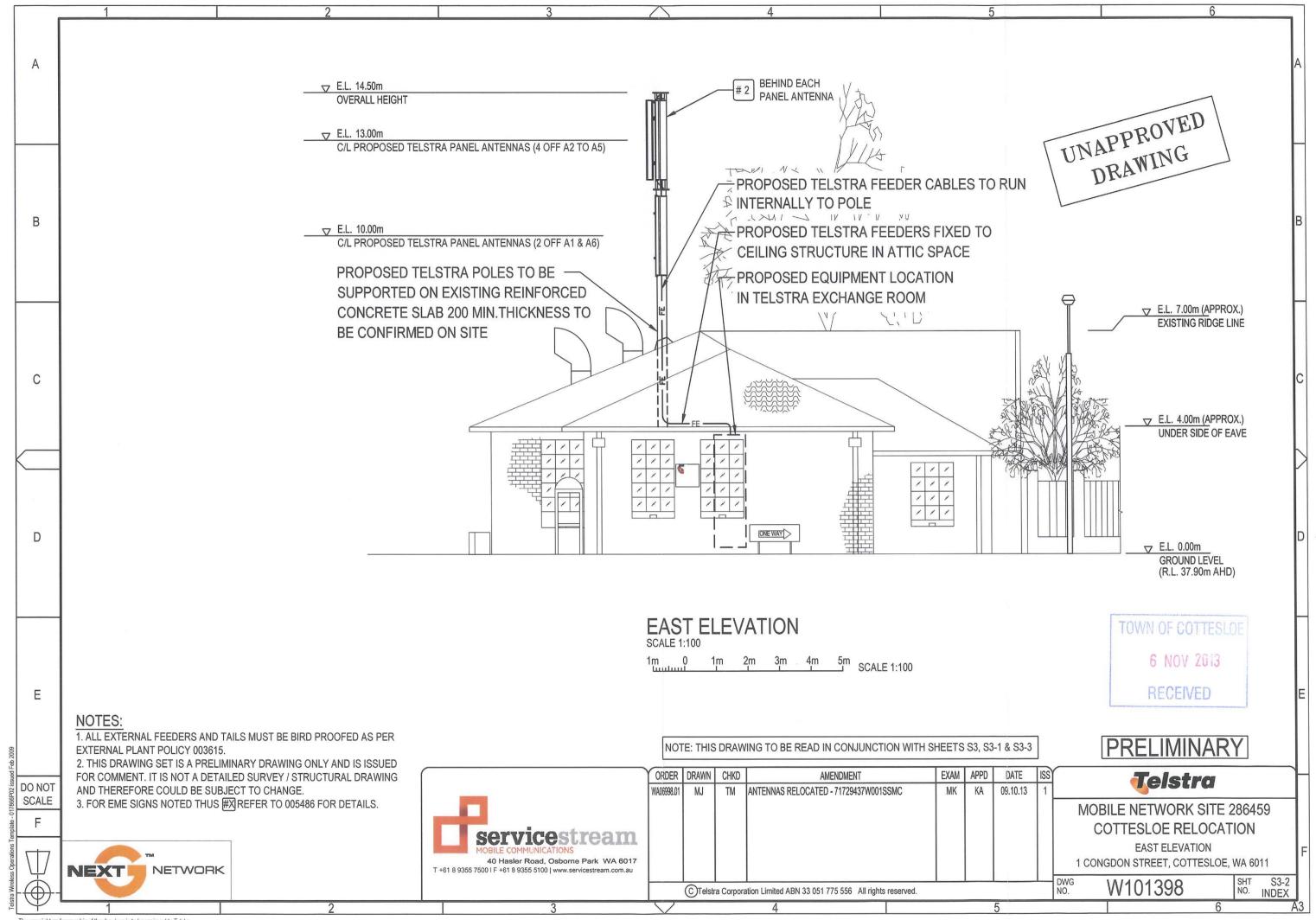


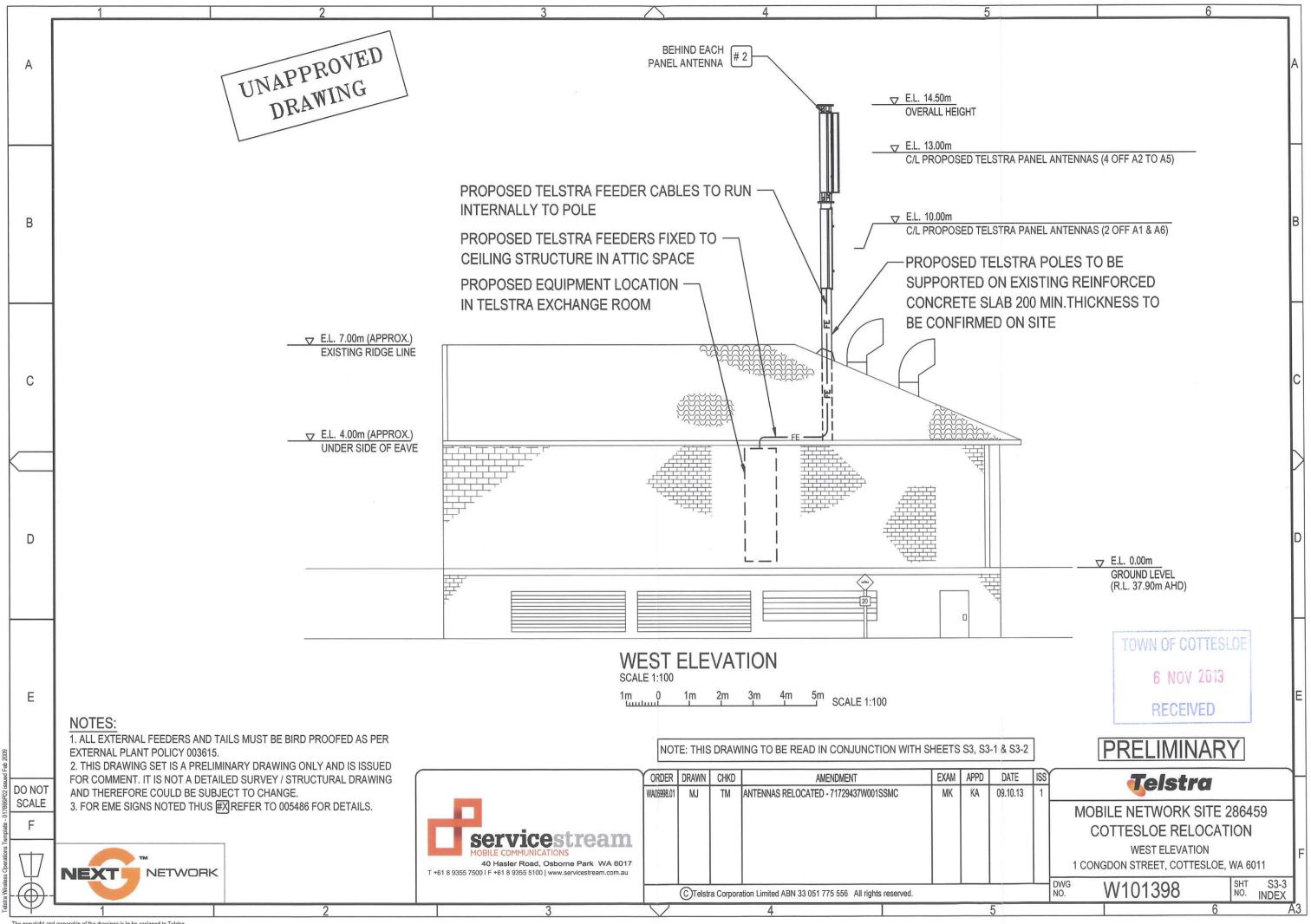


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		A2	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PRO	POSED) 13	.0m	190°	S2: GSM900 S2: GSM900 S2: SPARE S2: SPARE S2: SPARE S2: SPARE			
с	UNAPPROVED DRAWING	A3	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PRO	POSED	0 13	.0m	295°	S3: GSM900 S3: GSM900 S3: SPARE S3: SPARE S3: SPARE S3: SPARE S3: SPARE			
		A4	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PRC	POSE	0 13	3.0m	65°	S1: WCDMA850 S1: WCDMA850 S1: WCDMA2100 S1: WCDMA2100 S1: SPARE S1: SPARE			
D		A5	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PRC	POSE	D 13	3.0m	190°	S2: WCDMA850 S2: WCDMA850 S2: WCDMA2100 S2: WCDMA2100 S2: SPARE S2: SPARE			
E		A6	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PRC	POSE	5 10).0m	295°	S3: WCDMA850 S3: WCDMA850 S3: WCDMA2100 S3: WCDMA2100 S3: SPARE S3: SPARE			
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EXISTING VIEW FROM CLIVE STREET LOOKING EAST



PROPOSED VIEW FROM CLIVE STREET LOOKING EAST

PHOTOMONTAGE 3

NTS @ A3 04 November 2013 131104 3114 Photomontage.dwg 2/IA/LC-Rev/04.11.13 1/KG/First Draft/28.05.13

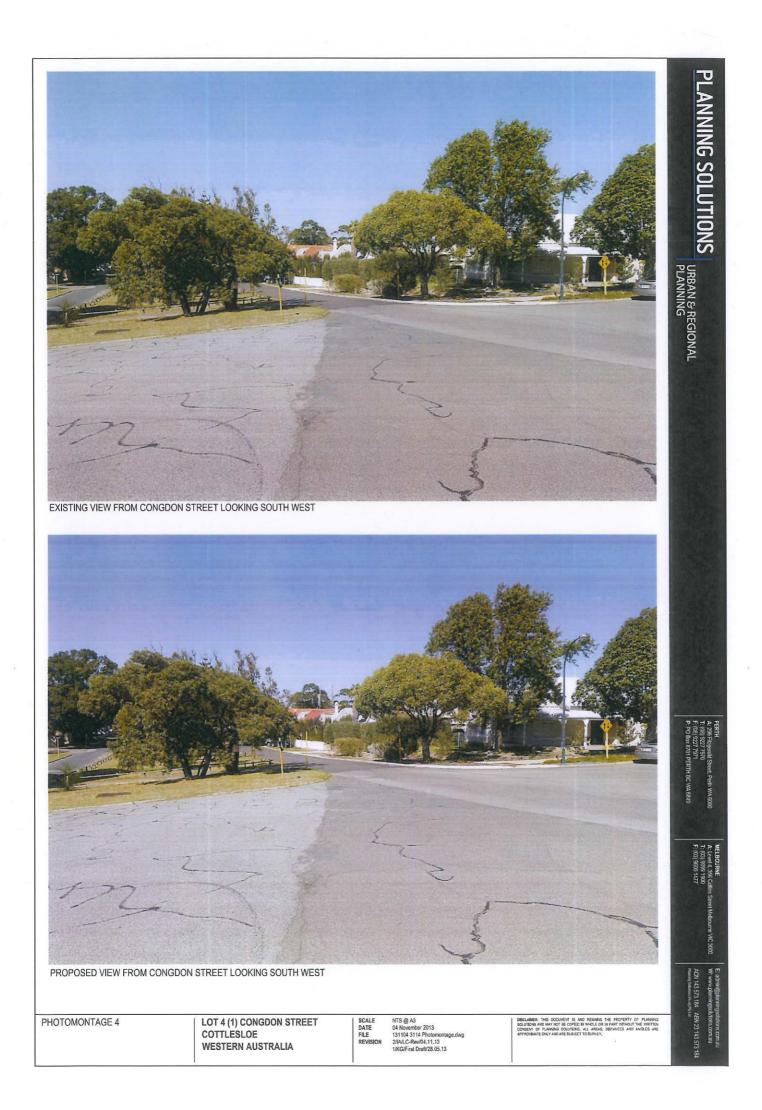
SCALE DATE FILE REVISION

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> T: (03) 9999 1900 F: (03) 9600 1477

> > E: admin@pla W: www.plan





Search Area Map:



Candidate A: (-31.987909° 115.769037°)

Candidate B: (-31.987107° 115.770125°)

Candidate C: (-31.988328° 115.769522°)

Candidate D: (-31.989933° 115.767810°)

Candidate A:

1Congdon Street, Cottesloe - Telstra telephone exchange building

Selected Candidate

Candidate B: 8 Congdon Street, Cottesloe - FESA facility

Reason for unacceptability

Unwilling landowner.

Would also require tower to 25m - greater visual impact on the area.

Candidate C: 392 Stirling Highway, Claremont – Apartment building

Reason for unacceptability

Multiple (strata) ownership. We have considered the owners unwilling. We have not had a formal response in writing but any proposal will be to the owners at the AGM later this year. In our experience, agreement from all residential strata owners is extremely unlikely. Low impact only option due to no statutory power for approval of a non-low impact site in Town of Claremont.

Candidate D:

121 Eric Street, Cottesloe - Dental Practice

Reason for unacceptability

Unwilling landowner.

Lower elevation would also require higher structure.



Additional Candidates:



Candidate E:

Candidate F:

Candidate G:

Candidate H:

Candidate E: 443 Stirling Highway, Cottesloe – Auto Masters

Still a viable Option

Landowner has shown conditional interest in a site at the Auto masters on favourable terms and conditions

Likely to have a greater visual impact along Stirling Highway than the Exchange however a monopole will accommodate multiple carriers via collocation. Will require a DA approval from Town of Cottesloe

Candidate F: Claremont Crescent – Swanbourne shopping precinct

Reason for unacceptability

Would not provide radio frequency coverage to the south, being the area requiring coverage due to terrain constraints and proximity to existing infrastructure (Dean St). Lower ground level would also require minimum 25m monopole. No statutory power for approval of a tower in Town of Claremont. Sensitive sites – retirement village and school in immediate vicinity.



Candidate G:

437 Stirling Highway, Claremont - Department of Housing units

Reason for unacceptability

Rooftop facility would provide poor radio frequency coverage to south. Tower to 30m would still provide inferior coverage to selected candidate and greater visual impact.

Candidate H: 2 Bindering Perede Claremont

2 Bindaring Parade, Claremont - Apartment building

Reason for unacceptability

Unwilling landowner

Inferior coverage and reduced capacity for the target coverage area compared to selected option.

Additional Candidates:



Candidate I: -

Candidate J:

Candidate K:

Candidate L:



Candidate I:

20 Richardson Avenue, Claremont - Apartment building

Reason for unacceptability

Unwilling landowner

Inferior coverage and reduced capacity for the target coverage area compared to selected option.

Candidate J:

1 Prospect Street, Claremont

Reason for unacceptability

Unwilling landowner

Low impact only option due to no statutory power for approval of a tower in Town of Claremont.

Candidate K: 14 McNamara Way, Cottesloe

Reason for unacceptability

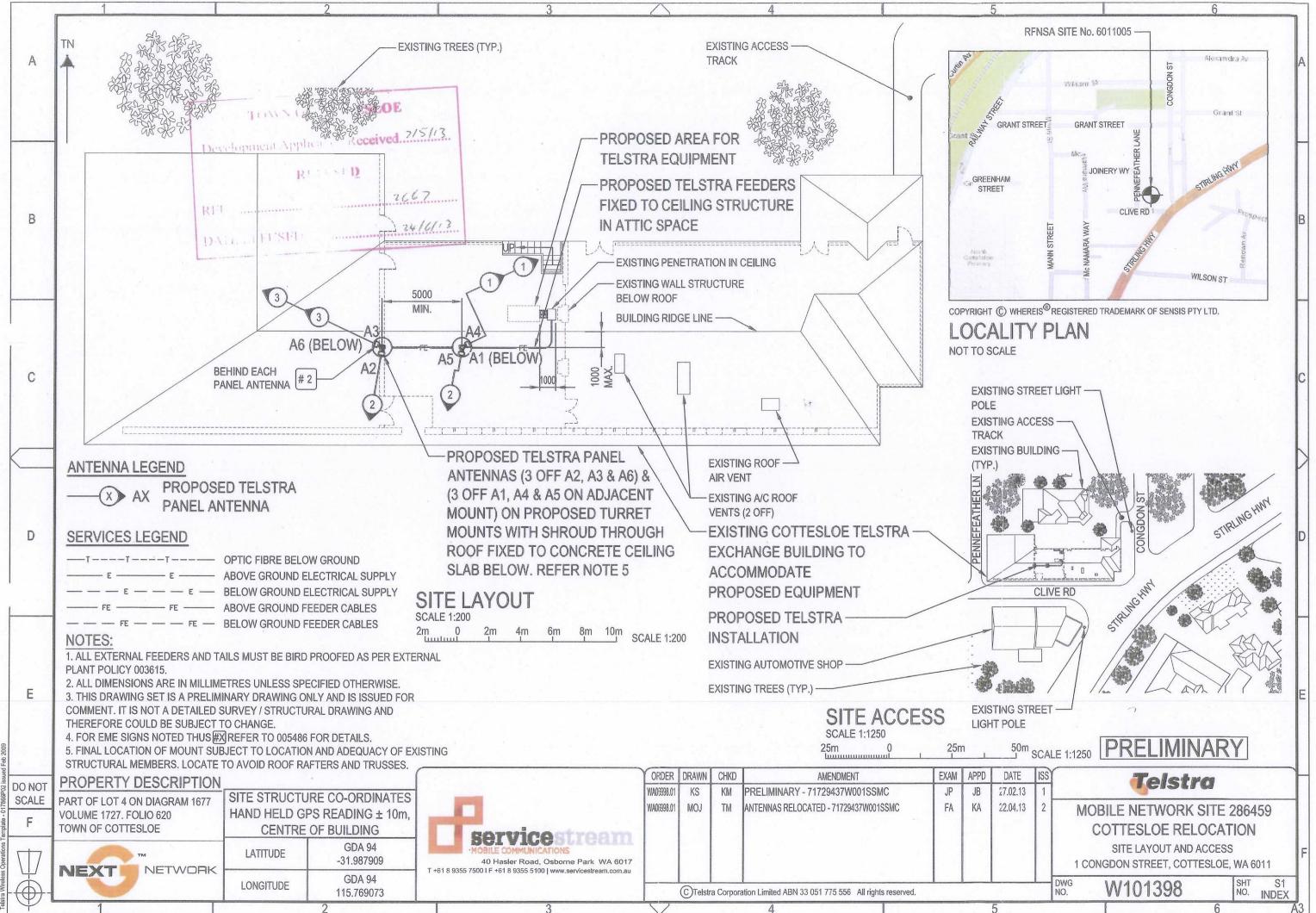
Multiple (strata) ownership. We have not been in contact with Strata Management. In our experience agreement from residential strata owners is extremely unlikely.

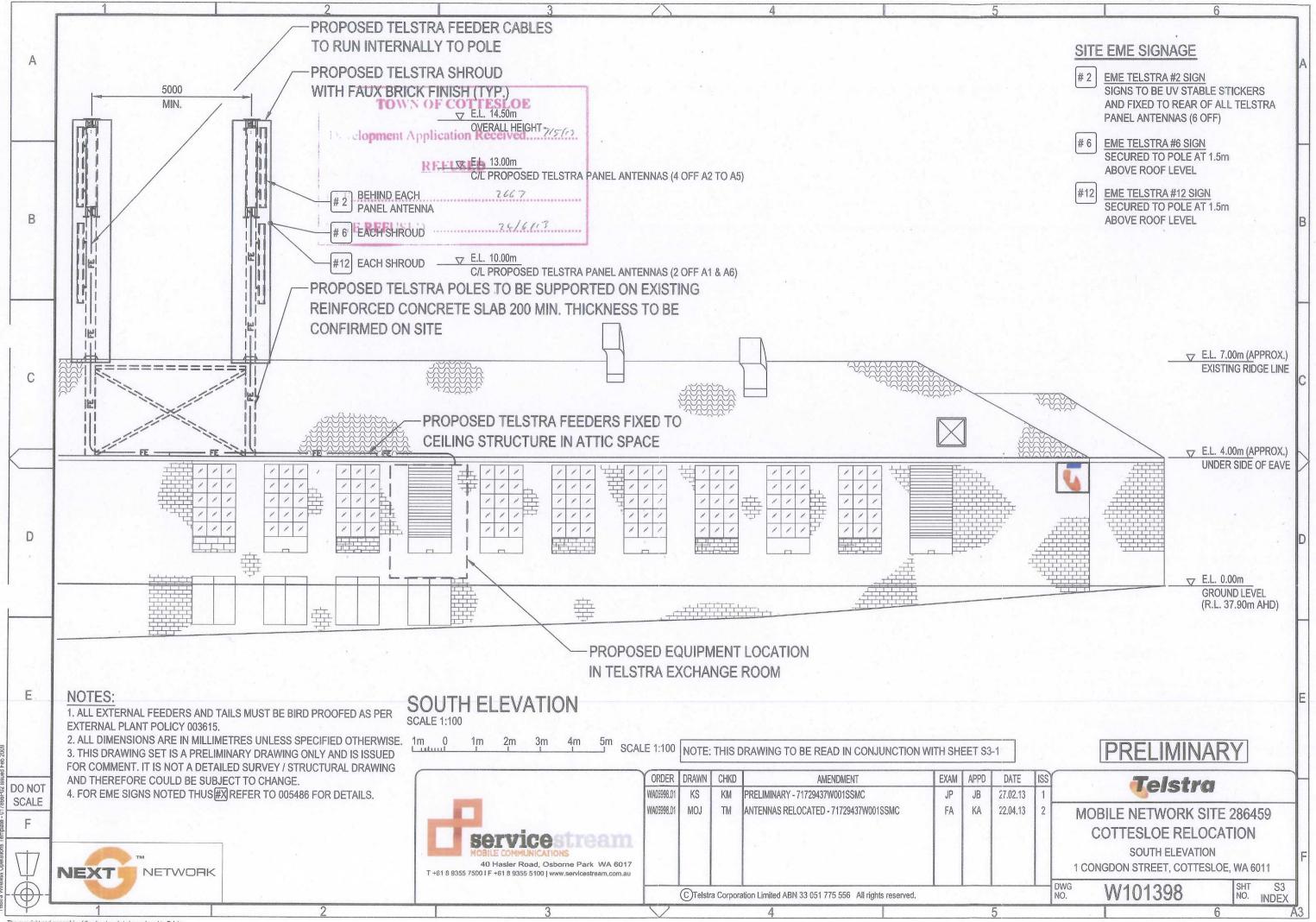
Candidate L:

396 Stirling Highway, Claremont

Reason for unacceptability

Multiple (strata) ownership. We have not been in contact with Strata Management. In our experience agreement from residential strata owners in extremely unlikely. Low impact only option due to no statutory power for approval of a tower in Town of Claremont. Lower ground level limits sites capabilities.





The copyright and ownership of the drawings is to be assigned to Telstra

A В TOWNORCONTENDOR Development Application bess of 7.15713. RELISED DATE REFUSED 14/6/03

ANTENNA No	ANTENNA TYPE & SIZE H x W x D	ANTENNA STATUS	ANTENNA HEIGHT C/L A.G.L.	PHYSICAL ANTENNA BEARING (°T)	SECTOR NO. & SYSTEM
A1	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PROPOSED	10.0m	65°	S1: GSM900 S1: GSM900 S1: SPARE S1: SPARE S1: SPARE S1: SPARE S1: SPARE
A2	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PROPOSED	13.0m	190°	S2: GSM900 S2: GSM900 S2: SPARE S2: SPARE S2: SPARE S2: SPARE S2: SPARE
A3	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PROPOSED	13.0m	295°	S3: GSM900 S3: GSM900 S3: SPARE S3: SPARE S3: SPARE S3: SPARE
A4	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PROPOSED	13.0m	65°	S1: WCDMA850 S1: WCDMA850 S1: WCDMA2100 S1: WCDMA2100 S1: SPARE S1: SPARE
A5	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PROPOSED	13.0m	190°	S2: WCDMA850 S2: WCDMA850 S2: WCDMA2100 S2: WCDMA2100 S2: SPARE S2: SPARE
A6	ARGUS CVVPX310B2 PANEL 2494 x 353 x 209	PROPOSED	10.0m	295°	S3: WCDMA850 S3: WCDMA850 S3: WCDMA2100 S3: WCDMA2100 S3: SPARE S3: SPARE

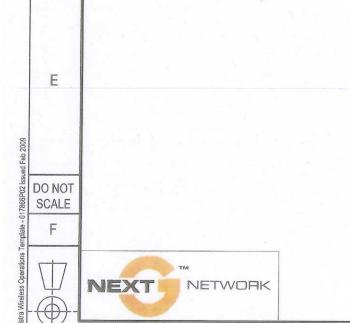
NOTE: THIS DRAWING TO BE READ IN CONJUNCTION WITH SHEET S3

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BILLE COMMUNICATIONS 10 Hasler Road, Osborne Park WA 6017 1F +61 8 9355 5100 www.servicestream.com.au							
		CTelstr	a Corpor	ation Limited ABN 33 051 775 556 All rights reserved.			Contrast (and a second second
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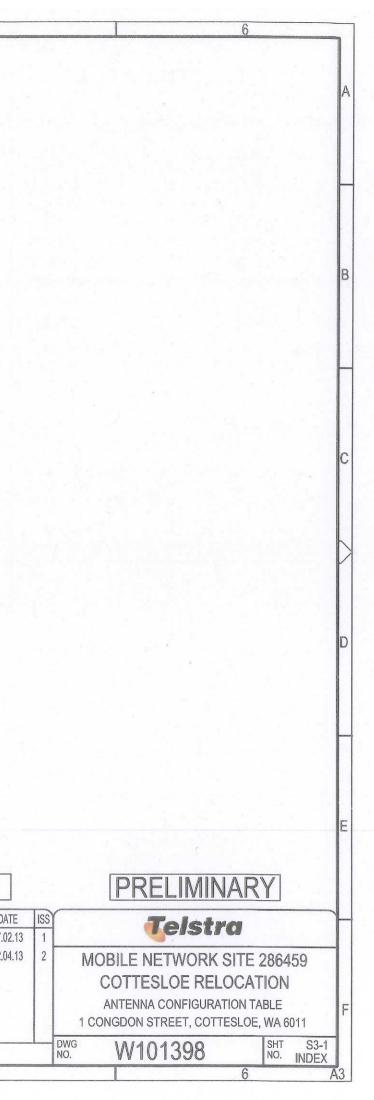
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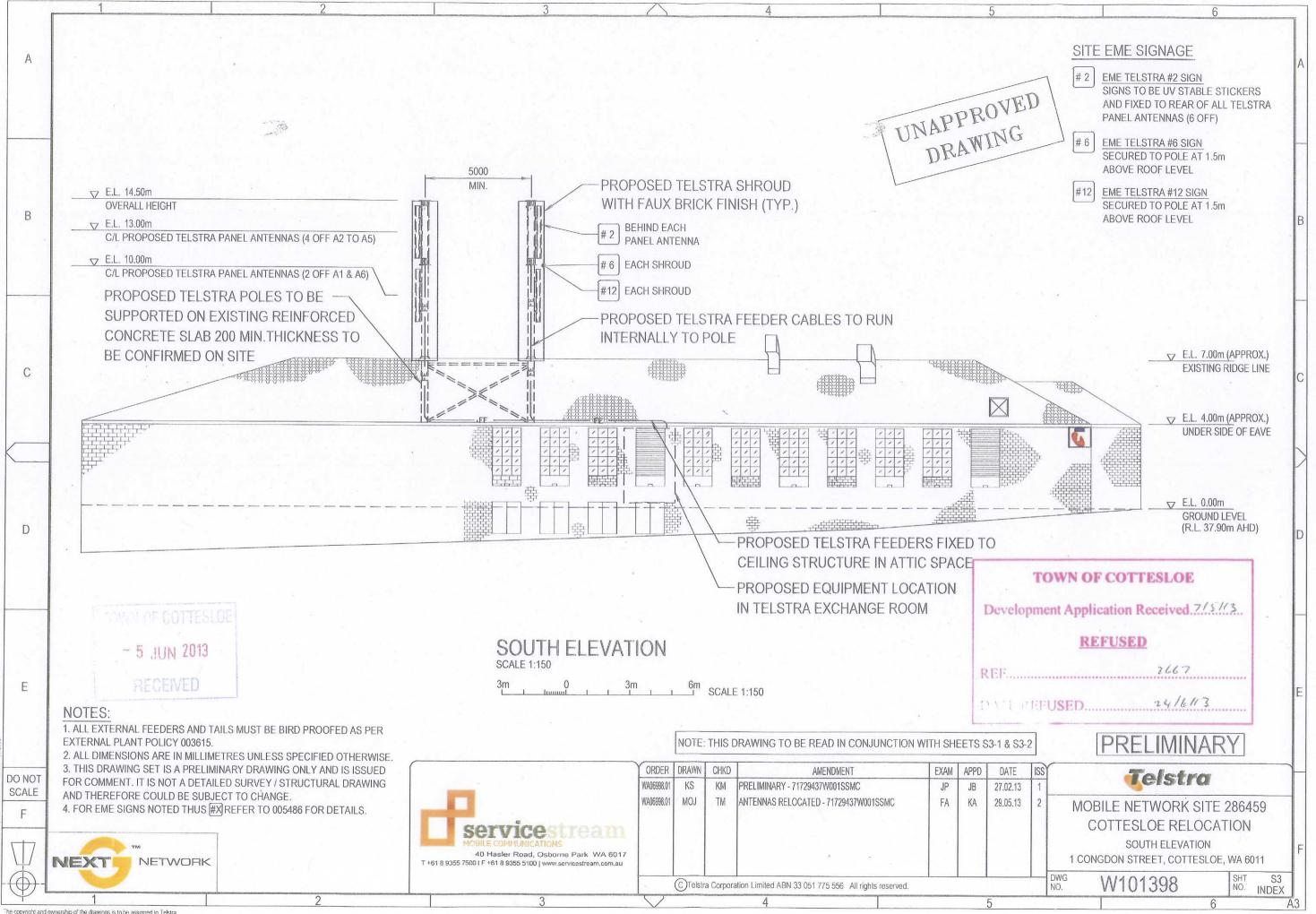


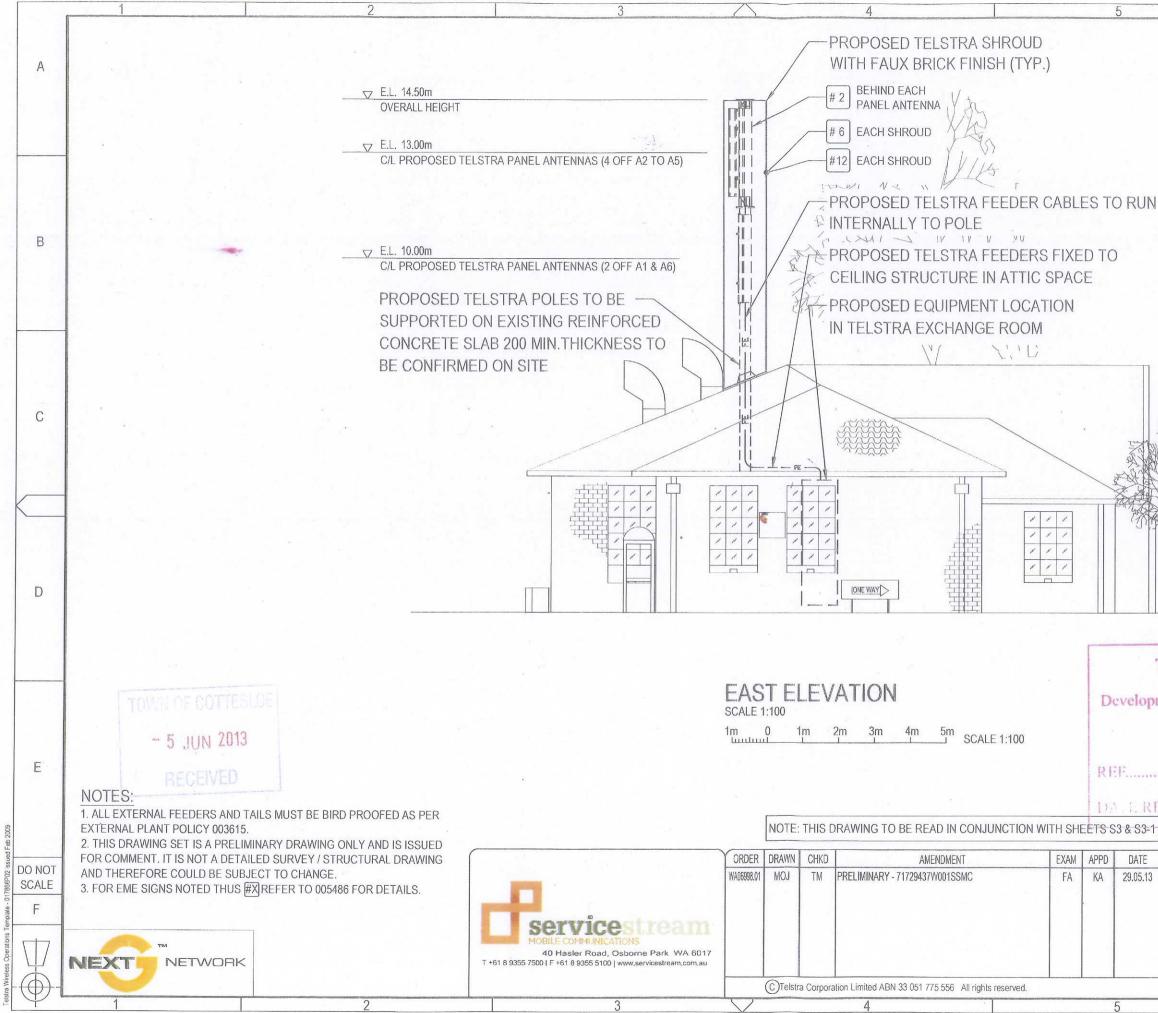
The copyright and ownership of the drawings is to be assigned to Telstra

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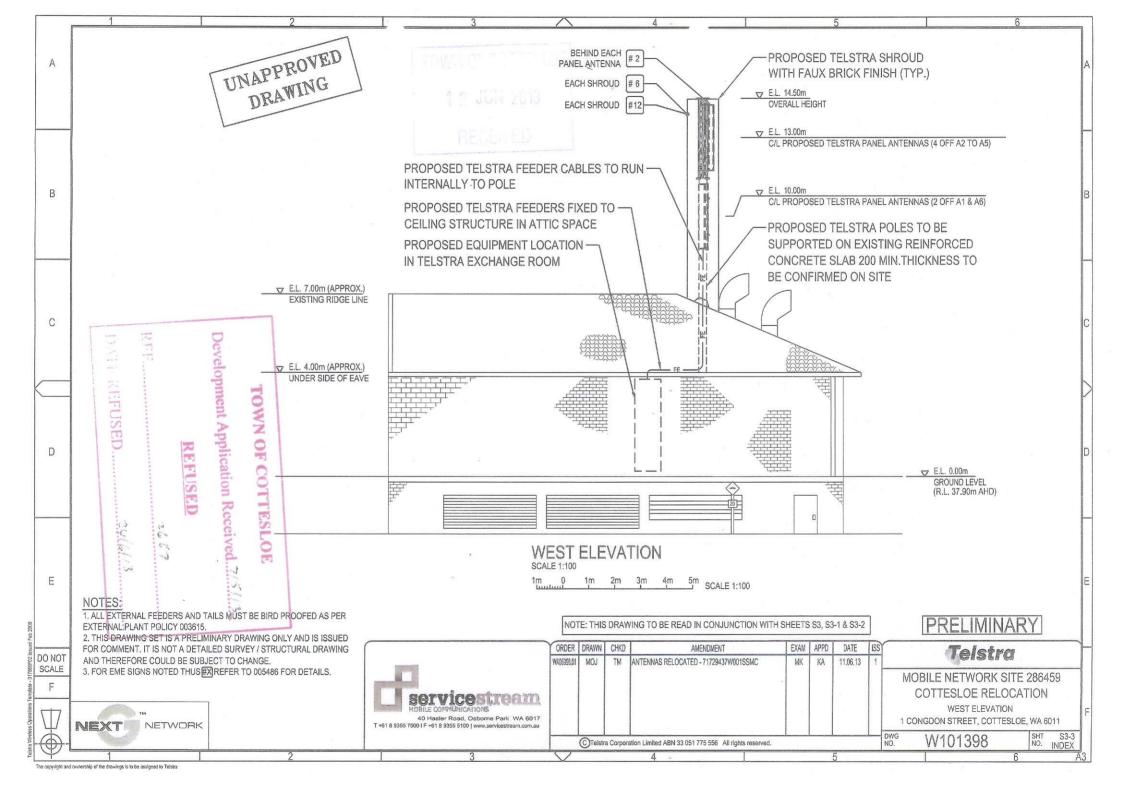
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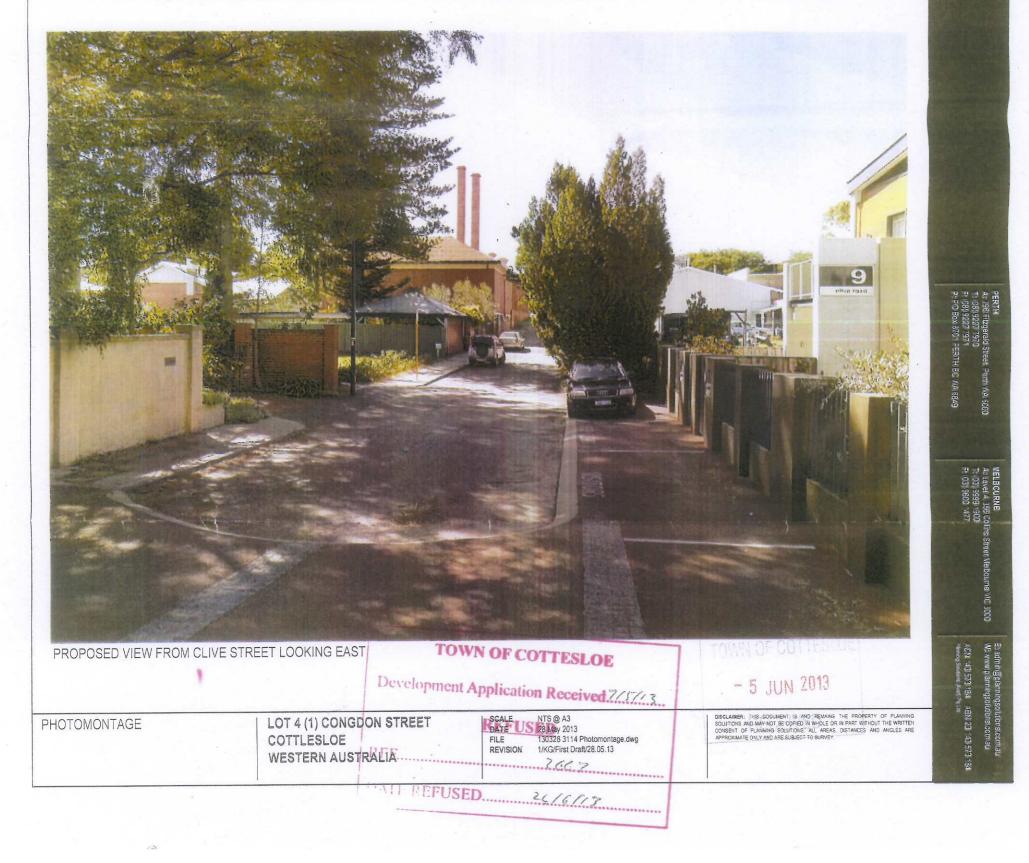


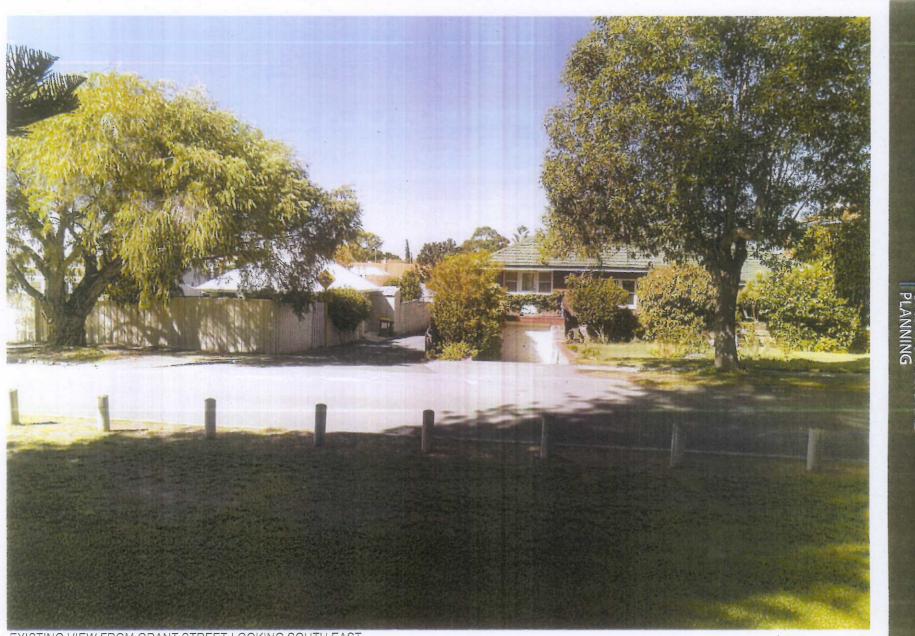
UNAPPROVED DRAWING ∠ E.L. 7.00m (APPROX.) EXISTING RIDGE LINE E.L. 4.00m (APPROX.) UNDER SIDE OF EAVE ∠ E.L. 0.00m **GROUND LEVEL** (R.L. 37.90m AHD) **TOWN OF COTTESLOE** Development Application Received. 71511.3. REFUSED 2667 REF DALL REFUSED 24/6/13 PRELIMINARY DATE Telstra 29.05.13 MOBILE NETWORK SITE 286459 COTTESLOE RELOCATION EAST ELEVATION 1 CONGDON STREET, COTTESLOE, WA 6011 DWG NO. S3-2 INDEX SHT W101398 NO.





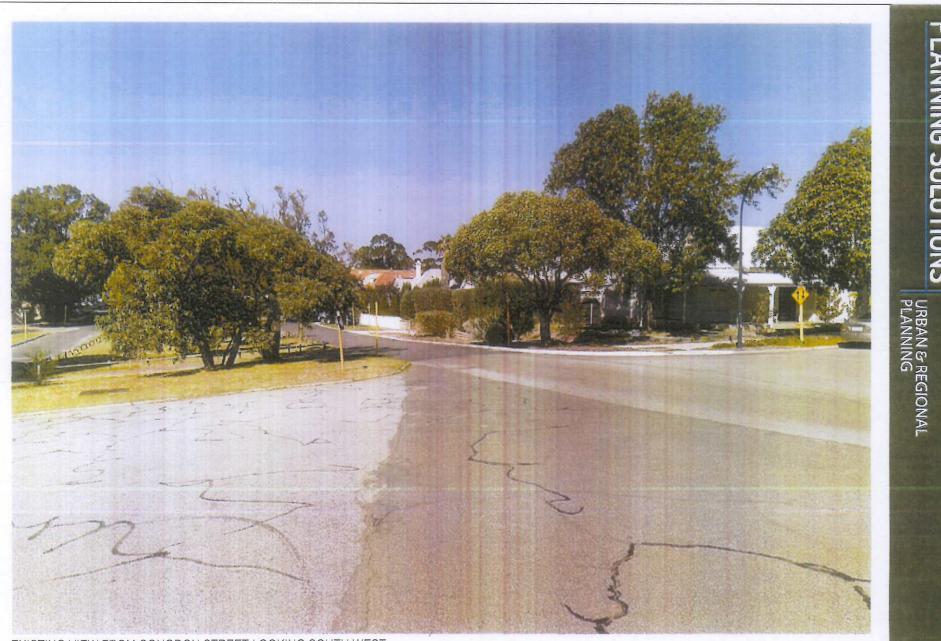
EXISTING VIEW FROM CLIVE STREET LOOKING EAST



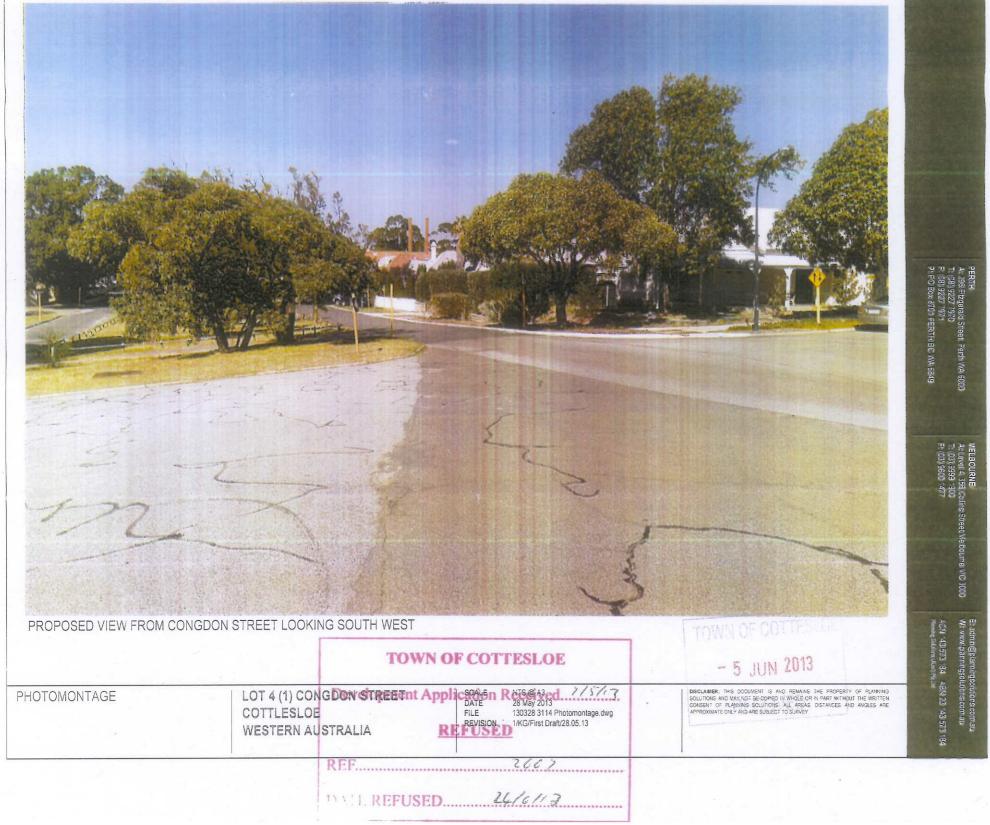


EXISTING VIEW FROM GRANT STREET LOOKING SOUTH EAST





EXISTING VIEW FROM CONGDON STREET LOOKING SOUTH WEST



DEVELOPMENT APPLICATION ON BEHALF OF TELSTRA CORPORATION

No 1 (LOT 4) CONGDON STREET – SIX TELSTRA PANEL ANTENNAS ON MOUNTING POLES ABOVE THE EXISTING TELEPHONE EXCHANGE BUILDING

THE DEVELOPMENT APPLICATION

Following the SAT Mediation (Matter No DR274 of 2013) there was agreement that Telstra would submit two parallel development applications, superseding their previous development application for No 1 (Lot 4) Congdon Street – Six Telstra Panel Antennas on Mounting Poles covered in Faux Brick Chimney Shrouds above the existing Telephone Exchange Building.

The two new development applications were to be:

- 1 Auto Masters (former Seaview Garage) site, corner of Stirling Highway and Clive Road six Telstra panel antennas on a mounting pole located in the yard to the rear of the site.
- 2 No 1 Congdon Street six Telstra panel antennas on two mounting poles above the roof to the rear of the original Telephone Exchange Building.

Telstra have subsequently advised that the owner of the Auto Masters site has decided not to allow a development application to proceed for the Auto Masters site.

The one remaining development application differs from the earlier application by the omission of faux brick chimney shrouds hiding the antennas and the mounting poles.

SUMMARY OF COMMENTS

This report addresses comments on the following matters which were matters to be addressed in the current development application following the SAT Mediation:

- A It is accepted that the opportunity for co-location of the telecommunications antennas, with other carriers, as encouraged by SPP 5.2 (Telecommunications Infrastructure) is not a feasible option in this situation.
- B It is now considered that the applicant has provided sufficient evidence that no feasible alternative site exists for the location of the proposed new Telstra telecommunication antennas and supporting poles.
- C The Applicant has sought to demonstrate a compatible balance between the utility of the proposed telecommunications antennas and the amenity of this area of high heritage value.
- D The proposal would now omit the faux brick chimney shrouds and expose the panel antennas and poles. The omission of the shrouds and the exposure of the panel antennas and poles is supported.
- E The Claremont Hill precinct, of Cottesloe, contains numerous identified heritage places and groups and has been proposed as a precinct of heritage value within the Town of Cottesloe.

- F All properties in the section of Congdon Street, containing the Telephone Exchange, are heritage listed places and have been proposed previously as a Conservation Area.
- G The proposed panel antennas and poles, when mounted on the existing Telephone Exchange would impact detrimentally on the important visual amenity of the identified heritage properties in Congdon Street and Clive Road.
- H The proposed telecommunications antennas, when mounted on the roof of the existing Telephone Exchange, would impact detrimentally on the streetscape values of Clive Road and the neighbouring section of Congdon Street.

COMMENTS

- A It is accepted that the opportunity for co-location of the telecommunications antennas, with other carriers, as encouraged by SPP 5.2 (Telecommunications Infrastructure) is not a feasible option in this situation.
- A1 The Town of Cottesloe has been in communication with the other carriers, or their agents, and co-location is accepted to not be an option for Telstra to address.
- A2 Following the SAT Mediation Telstra negotiated with the owner of the Auto Masters site on the other side of Clive Road, to locate the panel antennas and their supporting poles at the rear of the Auto Masters site. This would have lessened the visual impact of the panel antennas and poles on Stirling Highway and Congdon Street streetscapes and removed these from the view of upper Grant Street. Telstra advised that, after negotiations, the owner of the Auto Masters site did not wish to proceed with such a development application.
- B It is now considered that the development application provided sufficient evidence that no feasible alternative site exists for the location of the proposed new Telstra telecommunication antennas and supporting poles.
- B1 Telstra has advised that sites on the other side of Stirling Highway, advised in a previous development application submitted by Planning Solutions, had been considered but were rejected because these sites failed to provide the standard of telecommunications coverage required in the low points of the neighbouring Cottesloe area, around the railway line.
- B2 On the basis of the information received, there appear to be two criteria that have driven the choice of location:
 - The elevation of Claremont Hill; and
 - Existence of the telephone exchange, with its equipment to support the operation of the antennas.

These criteria, which relate to the utility of providing telecommunications coverage, limit the options to the telephone exchange or closely located sites, hence the focus on the Auto Masters site.

C The Applicant has sought to demonstrate a compatible balance between the utility of the proposed telecommunications antennas and the amenity of this area of high heritage value.

- C1 Under Burra Charter principles the panel antennas and their supporting poles are considered a contemporary extension of the historic activity of the Telephone Exchange, and would be an acceptable adaptation of this heritage place.
- C2 The utility value of the proposed panel antennas is not disputed, but the development application demonstrates that the visibility of the antennas and their supporting poles would have a visual impact on the values of heritage places in Congdon Street and Clive Road. The streetscape of this section of Congdon Street, Clive Road and Stirling Highway would be visually impacted.
- C3 On the basis of the information received, the applicant has not undertaken a comprehensive evaluation of the heritage places, streetscape values and the amenity of the neighbouring residential area. As a consequence their assessment of visual impact that would arise from the proposed telecommunications antennas is partial.
- D The proposal would now omit the faux brick chimney shrouds and expose the panel antennas and poles. The omission of the shrouds and the exposure of the panel antennas and poles is supported.
- D1 The faux brick chimneys are considered to be to be an inappropriate and clumsy reference to the chimneys of the residential properties in Congdon Street.
- D2 Under Burra Charter principles the honest expression of a function or installation is encouraged, particularly where it is recognised to be an extension of an historic activity.
- E The Claremont Hill precinct, of Cottesloe, contains numerous identified heritage places and groups and has been proposed as a precinct of heritage value within the Town of Cottesloe.
- E1 When the Municipal Heritage Inventory was produced it proposed a number of heritage precincts, including the Claremont Hill Precinct, which is the context of this development application. These heritage precincts were not adopted at that time because precincts were not addressed in the TPS2 or the Council's policy framework at that time.
- E2 In 2005 Hocking Planning & Architecture reviewed the MHI listings for the possible designations of heritage precincts, heritage groups and conservation areas, preparatory to incorporating the findings in the forthcoming LPS3 and its associated policy framework. A finding of that study was that the Claremont Hill precinct had a higher concentration of heritage places than most areas within Cottesloe. Another finding of that study was that the section of Congdon Street between Stirling Highway and Grant Street was the most complete heritage street-block in Cottesloe and was worthy of being classified as a conservation area.
- E3 The delay of several years in the approval of the LPS3 and its associated policy framework has left these important heritage considerations in a planning void. These historical factors have led to the heritage value and the streetscape value of the area neighbouring the telephone exchange being undervalued in the applicant's statements. Physically these heritage places do exist and their heritage value should be acknowledged.
- F All properties in the section of Congdon Street, containing the telephone exchange, are heritage listed places and have been proposed as a Conservation Area.

- F1 See D2 above. The residential properties in this section of Congdon Street retain their original form and character, apart from No 7 which has been adapted, but is capable of reconstruction to a higher level of integrity. The residential properties have appropriate curtilages and public domain setting to enhance their heritage value and to produce a streetscape of notable value.
- F2 This Congdon Street group of residences was found to be the most intact street-block of heritage properties within the Cottesloe district.
- F3 Despite its different function the relatively domestic scaling and detailing of the Telephone Exchange has made it a compatible, non-intrusive neighbour to the Congdon Street residences. Throughout its life, thus far, the industrial intrusions through the roofline have been kept within the southern roof plane and have not appeared above the ridge line. These intrusions have remained out of sight of neighbouring heritage places and streetscape views involving these places.
- F4 The proposed telecommunications antennas on their mounting poles would rise from the southern plane of the roof above the ridge line, to a height approximately double that of the ridge line.
- G The proposed panel antennas and poles, when mounted on the existing telephone exchange would impact detrimentally on the important visual amenity of the identified heritage properties in Congdon Street and Clive Road.
- G1 The telephone exchange roof is a significant element in any streetscape view within Congdon Street and Clive Road. Change to the appearance of that roof, as proposed, would have a marked impact on the streetscape of this section of Congdon Street and Clive Road.
- G2 The photomontage provided, in the development application, of the visual impact on Congdon Street, is taken from too far away to illustrate the visual impact which the panel antennas and poles would have. The photomontage does not show the homogeneity and consistent character of this group of buildings from World War I and the early Interwar period. The panel antennas on their mounting poles would detrimentally impact on the visual amenity and the heritage values of this section of Congdon Street, through the visual imposition of late 20th century telecommunications elements into this quite homogeneous precinct. If the antennas were able to be mounted further west on the roof of the Telephone Exchange the visual impact would be lessened. Telstra has advised that the structure of the addition to the western end was not capable of supporting the proposed panel antennas and supporting poles.

Whilst the visual impact of the proposed panel antennas would reduce the heritage values of the Congdon Street heritage places it would be a moot point in a SAT Hearing to contend that this loss of amenity justifies the loss of the utility of the telecommunications.

- G3 The photomontage provided of the visual impact on Clive Road shows that either of the options canvassed would have visually impacted on the amenity of the two heritage properties in Clive Road.
- G4 There is a further location on Claremont Hill, close to the Telephone Exchange, where antennas and poles of the height proposed would have greatly reduced visual impact on the streetscape views within Congdon Street and Clive Road. At the rear of 8 Congdon Street is

a FESA tower of approximately the same height as the proposed shrouds, which has little visual impact of the streetscape views containing places of high heritage value in Congdon Street. It is not visible from within Clive Road. Telstra has advised that FESA was not prepared to negotiate the possible location of the telecommunications antennas and mounting pole/s on the FESA site.

- H The proposed panel antennas and poles, when mounted on the existing telephone exchange, as proposed, would impact detrimentally on the streetscape values of Stirling Highway, Clive Road, the neighbouring section of Congdon Street and the upper section of Grant Street.
- H1 The location proposed for the panel antennas and poles would be offset in the line of sight of people approaching up Claremont Hill, along Stirling Highway, from the east. Given that the three buildings that form the visual context in this view are the Auto Masters garage, the Telephone Exchange and the former Fire Station, the telecommunications antennas and poles whilst being quite visible would not be inappropriate. The photomontage provided show that the panel antennas and poles would also be quite visible when approaching along Stirling Highway from the south. Again, the visual context of this section of Stirling Highway with the Auto Masters garage and the Telephone Exchange would not be inappropriate.
- H2 The proposed location of the panel antennas and poles would be dominant from within Clive Road, as shown on the photomontages. There would be visual intrusion on the amenity of the heritage places in Clive Road. The variable quality of the streetscape within Clive Road mitigates against its amenity overriding the utility value of the proposal.
- H3 The panel antennas and poles would be intrusive in the high quality of the streetscape in the neighbouring section of Congdon Street, particularly when viewed from the north. The high heritage value of this section of Congdon Street would be impacted upon by the visual intrusiveness of the panel antennas and poles. This is the area of greatest conflict between amenity and utility.
- H4 The panel antennas and poles would be quite apparent from the upper section of Grant Street, from within the park and ROW. This is another area of high streetscape value. The proposal is sufficiently removed from the immediate context of Grant Street to minimise the intrusiveness of the proposal.

CONCLUSIONS

- 1 The use of the Telephone Exchange building for the panel antennas and poles is a contemporary extension of its historical function. According to the submissions provided Telstra has exhausted all alternative sites to the Telephone Exchange.
- 2 SPP 5.2 requires the utility of telecommunications to be balanced against the retention of amenity. The above comments have endeavoured to assess whether a satisfactory balance has been achieved.
- 3 The values of the Congdon Street heritage properties would be lessened by the visual intrusiveness of the proposed panel antennas and poles. Similarly the streetscape value of this section of Congdon Street would be partly compromised by the proposal.

- 4 The values of the Clive Road heritage properties would be compromised by the visual intrusiveness of the proposed panel antennas and poles. However, the variable streetscape value of Clive Road mitigates the visual intrusion onto its streetscape.
- 5 The visual impact of the proposed panel antennas and poles on Stirling Highway would not be inappropriate to the immediate visual context of Auto Masters garage, the Telephone Exchange and the former Fire Station.
- 6 The visual impact of the proposed telecommunications antennas and posts is sufficiently removed from upper Grant Street to be considered incidental, rather than intrusive.
- 7 The proposed telecommunications antennas and posts mounted on the roof of the Telephone Exchange would, on balance, cause some loss of amenity and heritage value in order to provide the utility of adequate Telstra telecommunications coverage in the vicinity. Given SPP 5.2, it is a moot point that the impact on amenity and heritage values would be sufficient to uphold a refusal of the Telstra proposal.

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