



30 April 2009

Wireless Operations

Level 6, Telstra House
231 Elizabeth Street
Sydney NSW 2000
Australia

**Statutory Planning System Reform
Department of Planning and Community
Development
GPO Box 2392
MELBOURNE VICTORIA 3001**

Telephone 02 85763131
Facsimile
Mobile 0439 988926

bob.j.joice@team.telstra.com

Dear Sir / Madam,

Modernising Victoria's Planning Act- Telstra Submission

This submission to the Modernising Victoria's Planning Act Discussion Paper (March 2009) is made on behalf of Telstra Pty Ltd and is intended to supplement the submission made by the Mobile Carriers Forum (MCF) on behalf of the mobile phone carriers deploying networks in Australia.

The MCF submission provides a detailed analysis of the importance of telecommunications networks to Victoria's future and their far reaching positive impact on the functioning and form of cities and regions.

Telstra welcomes the opportunity to make a submission to the Department of Planning and Community Development and would like to respond to the matters raised in the Discussion Paper.

In particular Telstra requests that the following matters are considered in relation to the questions raised in the discussion paper:

4: Are the objectives of planning in Victoria still relevant?

It is considered that objectives relating to infrastructure provision in general do not adequately represent the importance of the impact of infrastructure on the functioning of our cities and regions. In turn the positive impact and growing importance of Telecommunications facilities should also be recognised in a new or revised Act.

6: The permit process

Shorter processes should be implemented for applications for telecommunications facilities in recognition of their fundamental impact on the functioning on a city or region.

Greater discretion should be implemented in relation to notification of an application. Council officers should be able to decide whether all owners and occupiers of adjoining land need to be notified of an application. This is particularly relevant to large sections of land in rural areas where the application may be for development on a small section of that land.

The term "objection" should be replaced with the term "submission" to encourage a balanced community response to telecommunications proposals in particular. In general the majority of the community seek better mobile phone coverage where they live and work. Currently, planning applications only invite objectors to respond to a proposal and thus Councils can form an unbalanced view of the wishes of its constituents.

The requirement for referrals may benefit from a more streamlined approach. This is particularly relevant to Telstra when deploying sites in rural areas. Referrals to DSE and AAV in relation to Native vegetation and Cultural Heritage would benefit from a more streamlined and consistent response.

8: State Significant projects

The introduction of criteria that identify State-significant projects in advance would make the decision making process more transparent. It would also mean that significant projects are decided at the level of government that aligns with the potential impact or scope of the proposal itself. It would be of particular benefit to Victoria if mobile phone carriers could apply for a particular "roll out" of new technology to be given state significance. The proposed upgrades and new sites required for the roll out would then be assessed in a consistent manner at a state level, rather than via each separate municipality which cause unnecessary costs and delays to the deployment of new technologies.

10: Other Opportunities

Telstra encourages the e-Planning Roadmap strategy and recognises that there are considerable opportunities to make planning more efficient for all stakeholders through the use of new technologies. Telstra also recognises the emergence of new technologies relating to digital design and visualisation. It is suggested that Councils should be encouraged and supported to invest in these technologies to enable interactive visualisation models for all stakeholders in all applications relating to visual impact.

Conclusion

In conclusion, Telstra appreciates the opportunity to make a submission to the Inquiry and would be to discuss the submission in more detail to assist in the Committee's deliberations if required.

If you require further information please do not hesitate to contact me.

Yours faithfully,



Bob Joice
General Manager, Site Acquisition
Wireless Operations
Tel: 02 8576 3131
Mob: 0439 988926
Email: bob.j.joice@team.telstra.com