Planning Submission

Replacement Telecommunications Tower | Mount Gisborne, Gisborne

PREPARED FOR WESTERN REGION WATER CORPORATION

20-000151-002-PS-AU-JM | 4 May 2020

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1 Snapshot

Application Details	
Applicant	*Western Region Water Corporation*
Subject Land	*Lot RES LP111376*
Subject Address	*Reserve, 198 Mount Gisborne Road Gisborne 3437*
Municipality	*Macedon Ranges Shire Council*
Proposal	*Buildings and Works for the purpose of a Telecommunications Tower (replacement)*
Zone	*Public Park and Recreation Zone (PPRZ*
Overlay	*Environmental Significance Overlay – Schedule 5 (ESO5Significant Landscape Overlay – Schedule 2 (SLO2)*
Permit Triggers	*Pursuant to:* • *Clause 36.02 Public Park and Recreation Zone, a permit is required to construct a building or construct or carry out works.* • *Clause 42.03-2 (Significant Landscape Overlay), a permit is required to construct a building or construct or carry out works.* • *Clause 52.19-1 (Telecommunications Facility), a permit is required to construct a building or construct or carry out works for a Telecommunications Facility.*
Aboriginal Cultural Heritage	*CHMP not required.*
Site Area	*12.7ha (approx.)*

Table 1: Application Details

2 Introduction

This application for a Planning Permit is made on behalf of Western Region Water Corporation (Western Water) for the purpose of obtaining planning approval to replace the previous Telecommunications Facility at Mount Gisborne on land known as Lot RES LP111376, or the reserve at 198 Mount Gisborne Road, Gisborne.

The application is being made as the previous Mount Gisborne Communications tower failed at the welded base and collapsed on 7th July 2019 during a significant storm event in the area.

Prior to the storm event, the telecommunications tower had existed at this location for over 30 years.

As will be detailed later in this report, this tower provided key communication services to Western Water, the CFA and other local businesses.

A temporary alternative has been implemented, with antennas located on two existing site huts however this outcome can only be temporary as it is not as reliable with significant risks of failure during an emergency.

The proposed replacement tower is to be sited in the same location as the previous tower on site however the replacement tower is intended to be approximately 5 metres lower in height.

The use of the land for the purpose of a telecommunications facility does not trigger the need for a permit provided the buildings and works meet the requirements of Clause 52.19 (Telecommunications facility)

The replacement tower does however require a Planning Permit pursuant to the following for buildings and works:

- Clause 36.02 Public Park and Recreation Zone, a permit is required to construct a building or construct or carry out works.
- Clause 42.03-2 (Significant Landscape Overlay), A permit is required to construct a building or construct or carry out works.
- Clause 52.19-1 (Telecommunications Facility), a permit is required to construct a building or construct or carry out works for a Telecommunications Facility.

This submission has been prepared to:

- Provide a description of the site and surrounding area;
- Outline the nature of the proposal and the need for the facility;
- Demonstrate compliance with the relevant Municipal Planning Strategy and the Planning Policy Framework, Public Parks and Recreation Zone, the Overlays and Clause 52.16 – Telecommunications Facility;
- Provide justification for the proposed development of the site.

The following is also provided in support of the application:

- Appendix A: Certificate of Title
- Appendix B: Site Plan prepared by Wayne Mitchell Surveying
- Appendix C: Telecommunications Tower plans prepared by Wireless Network Ballarat
- Appendix D: Photographs taken by Western Water

3 Site and Surrounds

Subject Site

The subject site forms the summit of Mount Gisborne, a 100 metre high lava hill that overlooks Gisborne and the surrounding locality. It is zoned Public Park and Recreation Zone and is identified as Lot RES LP111376, with a street address of 198 Mount Gisborne Road, Gisborne. The subject allotment is approximately 12.7ha in area, is irregular in shape and is accessed from Woodland Drive which also forms the northern boundary of the site.

The land is owned by the Macedon Ranges Shire Council.

Whilst the summit site is within the Public Park and Recreation Zone, the slopes of the Mount are within either the Rural Living Zone or the Rural Conservation Zone.

An informal walking track ascends the reserve to the summit of the Mount, which features large basalt boulders. The summit provides views of the surrounding district and as far as Melbourne's CBD.

The site is located approximately 55 kilometres north-west of Melbourne and approximately four kilometres south of the Gisborne central business district.

Macedon Ranges Shire Council has leased two parts of the reserve to telecommunications service providers over the years. The individual licences allow telecommunications towers and associated sheds in three locations which are shared by these providers.

As previously stated, the site has accommodated a telecommunications tower for over 30 years near to the top of the summit. This tower failed at the welded base in July last year and temporary arrangements have facilitated a reduced level of communications occurring from the site. The existing access track provides access to the tower site.

Vegetation across the site is a mix of canopy Manna Gum Eucalyptus, Tussock-grass, wattle, and shrub species to varying levels of cover.

Figure 1: Aerial Photograph of Subject Site (outlined in white)

Surrounding locality

The subject site is located in an area that is a mix of rural residential and conservation uses, as is reflected by the zoning of the area. The site is approximately 1km south of the edge of the Gisborne urban area.

Land surrounding the site to the north, east and west is zoned Rural Living Zone, with the land to the south of the site being within the Rural Conservation Zone. Surrounding properties are generally rural residential, hobby farm or small scale agriculture and tourism in nature.

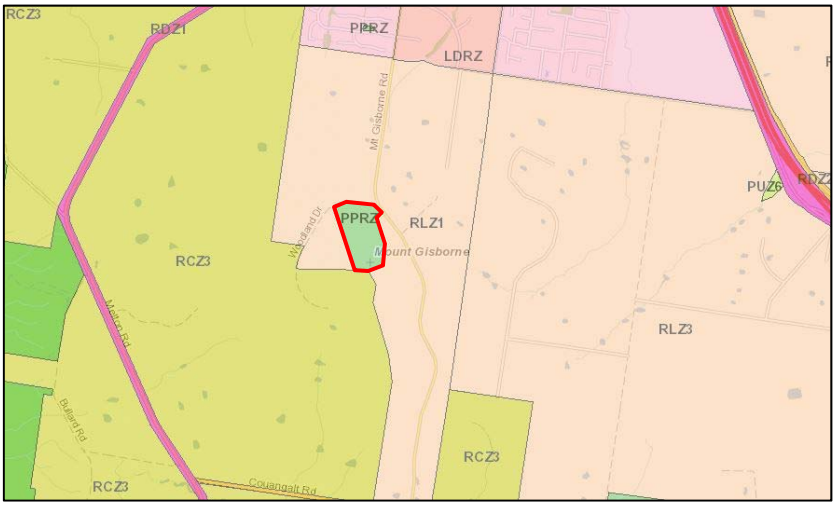

Figure 2: Site Locality and Zoning Context

Mount Gisborne Road is a main road that provides access to Gisborne and the wider regional and state transport network, including the Calder Highway to the east, and the Melton Road to the west.

The landscapes in the wider locality are rural or agricultural in nature, with a mix of indigenous and native vegetation species lining roadsides, as well as exotic species forming garden areas and windbreaks. The topography is undulating with moderate to steep sloping hills, including Mount Gisborne itself and particularly towards the Macedon and Lerderderg State Parks to the north and west respectively.

Figure 3: Locality aerial

3.1 Previous and existing telecommunications infrastructure on site

Previous Telecommunications Tower

The previous Mount Gisborne telecommunications tower was first constructed in 1987 by the now-defunct Victorian Communications for the purpose of radio operations for Silver Top Taxis and maintained by Silver Comm Pty Ltd and over time additional services were placed upon the tower for local authorities and businesses as it was in an ideal location to reach the local area. These services included Western Water and the CFA.

The tower was a monopole design and was approximately 22.5 metres in height. It contained numerous telecommunications equipment including antennae and microwave dishes.

During the storm on 7th July 2019 the tower failed from the welded base and collapsed. From October that year, Western Water has taken over operation of the communications facilities on site where temporary services have been reinstated on the existing communications hut for that organisation, CFA and radio voice services for two concrete companies.

Figure 4: Mount Gisborne tower before and after structural failure

These temporary services provide communications to all Western Water sites, but at a de-rated capacity, causing increased message failures. The organisation no longer has direct linkages from a data concentrator in Sunbury through to their disaster recovery (DR) centre at Rosslynne Water Filtration Plant at Gisborne. As a result, if there was a server outage or Telstra failure, Western Water could not operate and monitor the real time data system via the Rosslynne disaster recovery site.

Therefore, a replacement tower is required.

Figure 5: Former tower site, looking north-west to the summit of Mount Gisborne

Figure 6: North West view of the site and base of the previous tower

Other telecommunications facilities on site

Other infrastructure on site consists of a 30m high Telstra telecommunications tower located on the northern boundary of the site and is accessed by a purpose built gravel driveway and locked gate from Woodland Drive. The driveway and tower infrastructure is fenced on all sides. The perimeter of the tower has been scalped of vegetation.

Tower infrastructure on the southern boundary is located near the Mount Gisborne summit and now consists of two small buildings form part of the previous tower's infrastructure and are located nearby on adjacent land. An informal path connects the tower site to these buildings.

These buildings have been upgraded to a minor extent as a substitute for the previous tower infrastructure, however the communications capacity is low and therefore unsustainable for Western Water's and other's requirements. Therefore the proposed replacement tower is required.

Figure 7: View of existing infrastructure on the adjacent land from the former tower site

4 Proposal

4.1 Replacement Telecommunications Tower

Proposal

Approval is sought for the development of land for a new telecommunications facility to replace the previous one on site, as explained earlier in this submission. Clause 52.19 of the Planning Scheme provides for development and use of all land for the purpose of 'telecommunications facilities'. This land use is defined as:

- *Land used to accommodate any part of the infrastructure of a Telecommunications network. It includes any telecommunications line, equipment, apparatus, telecommunications tower, mast, antenna, tunnel, duct, hole, pit, pole, or other structure or thing used, or for use in or in connection with a Telecommunications network.*

The proposed replacement telecommunications facility falls within this definition and will comprise of:

- A 15 metre high monopole tower and ancillary components that bring the total height of the structure to 17.5 metres.

The specific components of the proposed installation are described below:

- Dipole array;
- Two WW link antennas;
- VHS Voice Comms WW antennas;
- Four microwave dish installations for use by Western Water and the CFA.

The replaced tower will be reconstructed at the same location and will restore sustainable and reliable communications services to Western Water, the CFA and the two concrete dispatching companies.

Figure 8 below is an elevation of the tower, Figure 9 is an elevation of the proposed replacement tower alongside the previous tower on site. Please refer to Appendix C for further details of the plans.

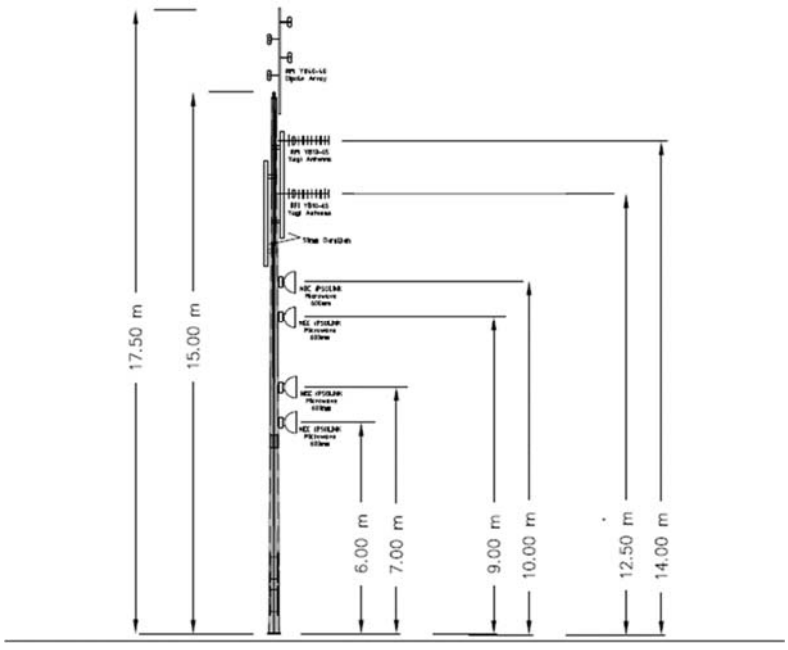

Figure 8: Elevation plan of the proposed replacement tower

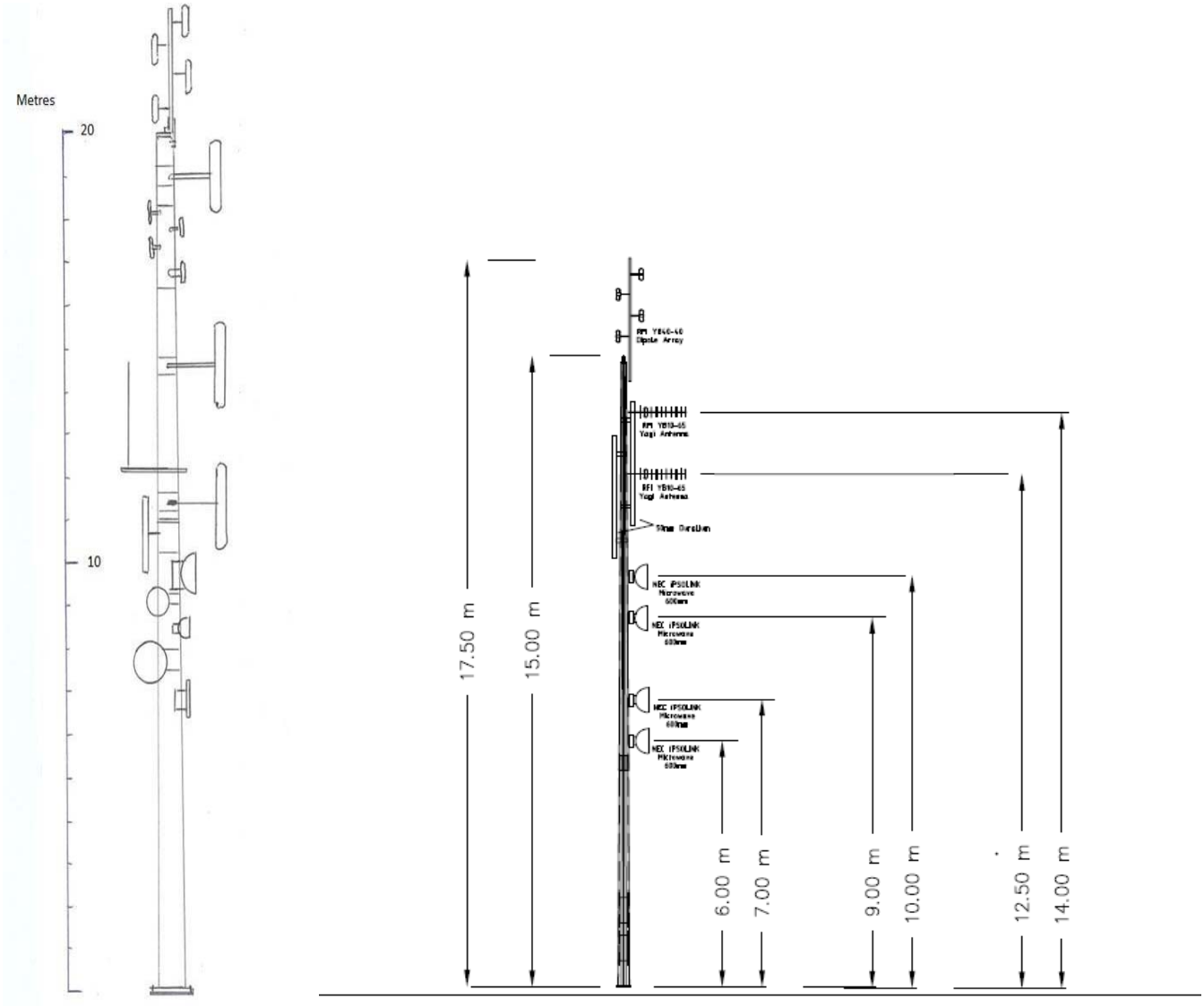

Figure 9: Elevation plan of previous tower (left) compared to proposed replacement tower and ancillary components (right)

Purpose of the proposed replacement tower

The previous telecommunications tower was a key component of a regional communications network. As such, the temporary measures are unsustainable due to dropouts and other failures. A permanent communication solution to replace the service provided by the collapsed tower at Mount Gisborne is needed for the following reasons:

- To provide a microwave link and to restore the quality of SCADA (real time data) communications link from Sunbury (Jacksons Hill) to the disaster recovery centre located at Rosslynne should the head office server room fail;
- In reinstating the tower, Western Water will re-establish high grade communications to key infrastructure sites in fire-prone areas that can remotely turn on asset protecting deluge systems and alternate water sources in fire events. It will also provide all the functionality to fill water storage tanks, remove sewage and operate water and waste water treatment facilities including complex alarm systems.
- Western Water has a UHF based radio system for all field staff including personnel monitoring in a man down situation. Currently this system has substantial blackspots and placing a base station at this site would mitigate the black spot risk.

- Western Water operates its own independent radio system separate to the likes of Telstra or other telco's. In doing this, the company provides a robust system which can be internally maintained. This is industry best practice to protection against cyber-attack and ensure we can continue to provide essential services. The new tower will ensure this.

- From a CFA perspective, the previous tower was pivotal in providing voice communications to all the surrounding Mount Gisborne area and the Mount Macedon aspects. It also provides critical communications to the Incident Control Centre covering all major incidents, including bushfires which are expected to only become more frequent in the coming years and decades. The new tower will ensure CFA preparedness and warning systems will be in place for the foreseeable future.

Siting

The replaced tower will be reconstructed at the same location as the previous and will restore sustainable and reliable communications services to Western Water, the CFA and two concrete dispatching companies. The new tower will therefore make use of the existing telecommunications infrastructure on site.

Geographically, the Mount Gisborne site provides optimal radio communications to a multitude of sites without the need of repeater sites which induce risk by nature of points of failure while increasing the visual impact to residents. This site provides radio Communications to Myrniong, Bacchus Marsh, Melton, Sunbury, Diggers rest, Gisborne, Riddells Creek, Macedon, Mt Macedon & Woodend. It is therefore considered the optimal site for radio telecommunications infrastructure to the region for our client's purposes.

Western Water has considered other options other than the proposed replacement tower, however these options were considered unfeasible for the following reasons:

- Western Water have looked at routing the required data via the Riddle Road Tank and Magnet Hill Tank, however substantial upgrades would be required with very high communication structures and therefore would have a high visual impact. The Magnet Hill site in particular requires an extensive power upgrade which would involve major excavations alongside several private properties and Crown land.

- The replacement tower cannot be placed closer or within the adjacent property as the existing planted trees will inhibit the operation of the Microwave links. Microwave radios rely on unobstructed line of site and therefore any other location near or in the adjacent property would require an increased tower height higher than the original or removal of vegetation.

In all, replicating the functionality of the Mount Gisborne tower in a different geographic location would be very difficult, time consuming and would also provide reduced effectiveness and coverage. This would be a very much sub-optimal outcome for our client, a major utility provider, as there would be an increased risk for critical services failure to water supply and firefighting.

4.2 Environmental Impact and the existing Environmental Management Plan

The proposed communications tower will be shorter than the previous tower by approximately 5m, whereby the previous tower height was approximately 22.5m and the new tower height is to be approximately 17.5m and will be sited in the same location. The lower height will reduce the visual impact upon the environment in comparison to the previous tower.

As the tower is to be constructed in its previous position utilising the existing infrastructure and access arrangements on site, there will be minimal impact upon the environment.

During the construction phase where the tower is erected and rigged, existing assets will be re-used where possible to minimise the need for major works on-site including detailed investigation will be carried out whether existing foundations can be re-used or reinforced. Existing conduits will provide access for cabling to the communication huts on the adjacent property to the south.

It is expected that the tower will require minimal maintenance on an ongoing basis. This will include access from the neighbouring property for the majority of inspections (4-6 times per year) and access via the existing track limited to two times per year, aside from construction.

Access to the site for construction will be via the existing access track, however ongoing maintenance and site inspections will be undertaken by walk through via the neighbouring property to the south known as 260 Mount Gisborne Road. The property owner and Western Water have such an access agreement already in place.

A Management Plan was developed in 2018 (Management Plan: Access to Infrastructure at Mount Gisborne Reserve, Gisborne; Atlas Ecology). The plan was approved by Council and covers access and maintenance activities on site and addresses concerns about these activities' impact upon the Mount Gisborne ecosystem.

Any additional risks identified through the planning and construction process of this new tower can be added to the Management Plan and have appropriate control measures implemented.

As part of this application, it is sought to update the Management Plan to remove Point 13 which in summary seeks to "Investigate opportunities to move all summit infrastructure to a neighbouring disturbed farming property". As explained in this submission, this investigation has now been undertaken and concluded that removal of the infrastructure to another site is not appropriate in order to ensure optimal communications for these authorities. Setbacks from neighbouring properties

There are a number residences within the immediate locality of the proposed tower. These are shown on the Figure below. The Site Plan at Appendix B provides distance measurements from each property.

Figure 10: Proximity of Proposed Tower to other Dwellings (dwellings represented with red 'X')

As the tower will be lower in height than the previous structure and in the same position, the views and amenity of existing properties on Mount Gisborne will not be impacted by the proposal owing to topography where the residences sit lower than the tower, and that primary views from each residence look away from the tower to the surrounding locality. Similarly, existing garden vegetation and vegetation on public land obscure views of the summit from the surrounding properties.

The closest neighbouring dwelling (260 Mount Gisborne Road) is located approximately 85 metres south of the tower site. This property already hosts the existing Communications Hut and provides pedestrian access to the site through an existing agreement with Western Water. Substantial vegetation planting along the northern property boundary has provided screening between this residence and the tower site, and the primary views from the residence are towards the south east. As well as lower topography and existing screening of vegetation, views to the proposed tower are expected to be limited.

The next closest residence is located approximately 245m to the north east of the tower site and has the property address of 206 Mount Gisborne Road. Similarly to 260 Mount Gisborne Road, this residence is located lower than the ground level of the tower site, and is entirely screened from views to the tower by topography and well established pine trees that encompass the property boundary.

Beyond these two dwellings, the next closest dwellings are 255m, 335m, 355m, 360m and 380m away and are similarly located well below the tower site and therefore their views towards the summit and the tower are limited due to topography and vegetation.

More broadly, the land uses in the wider context are rural sites with only long-distance views of the facility. It is submitted that whilst from a long distance the tower may be viewed, given the tower will have a lower height than the previous facility and the facility is relatively minor in nature, visual amenity impacts will be minor.

No sensitive community facilities are located within a 1 kilometre radius of the site.

5 Planning Context

Areas of policy considered of most relevance to this application identified in the table below and detailed in the following sections:

Relevant Policy and Planning Controls	
Planning Policy Framework	Clause 10 – Objectives of Planning in Victoria Clause 11 – Settlement Clause 12 – Environmental and Landscape Values Clause 15 – Built Environment and Heritage Clause 17 – Economic Development Clause 19 – Infrastructure
Local Planning Policy Framework	Clause 21.02 – Key Issues and Influences Clause 21.03 – Vision and Strategic Framework Clause 21.05 – Environment and Landscape Values Clause 21.08-3 – Built Environment Clause 22.01 – Macedon Ranges and Surrounds
Zone	Clause 36.02 – Public Park and Recreation Zone
Overlays	Clause 42.01 – Environmental Significance Overlay – Schedule 5 (ESO5) Clause 42.03 – Significant Landscape Overlay
Particular Provisions	Clause 52.19 – Telecommunications Facility
General Provisions	Clause 65 - Decision Guidelines
Administration and Enforcement of this Scheme	Clause 72.04 – Documents incorporated into this Planning Scheme • *A Code of Practice for Telecommunications Facilities in Victoria, July 2004*

Table 2: Planning Controls

5.1 Planning Policy Framework (PPF)

Clause 10 of the State Planning Policy Framework (SPPF) seeks to ensure that the objectives of planning in Victoria are fostered through appropriate land use and development planning policies and practices which integrate relevant environmental, social and economic factors in the interests of net community benefit and sustainable development.

Clause 11 Settlement outlines that planning is to anticipate the needs of existing and future communities through a number of methods. With this in mind, planning is to contribute towards (where relevant):

- *Health, wellbeing and safety.*
- *Adaptation in response to changing technology.*
- *Economic viability.*
- *A high standard of urban design and amenity.*
- *Prevention of pollution to land, water and air.*
- *Protection of environmentally sensitive areas and natural resources.*
- *Planning is to prevent environmental and amenity problems created by siting incompatible land uses close together.*
- *Planning is to facilitate sustainable development that takes full advantage of existing settlement patterns and investment in transport, utility, social, community and commercial infrastructure and services.*

Clause 11.03-3S Peri-urban areas has the objective to "To manage growth in peri-urban areas to protect and enhance their identified valued attributes". The clause notes that planning is to:

- *Identify and protect areas that are strategically important for the environment, biodiversity, landscape, open space, water, agriculture, energy, recreation, tourism, environment, cultural heritage, infrastructure, extractive and other natural resources.*
- *Provide for development in established settlements that have capacity for growth having regard to complex ecosystems, landscapes, agricultural and recreational activities including in Gisborne and other towns identified by Regional Growth Plans as having potential for growth.*
- *Prevent dispersed settlement and provide for non-urban breaks between urban areas.*
- *Ensure development is linked to the timely and viable provision of physical and social infrastructure.*

Clause 11.03-5S Distinctive areas and landscapes has the objective to "To protect and enhance the valued attributes of identified distinctive areas and landscapes." The following strategies are considered relevant to achieving this:

- *Recognise the significant geographic and physical features of these areas.*
- *Recognise the important role these areas play in the state as tourist destinations.*
- *Protect the identified key values and activities of these areas.*
- *Support use and development where it enhances the valued characteristics of these areas.*
- *Avoid use and development that could undermine the long-term natural or non-urban use of land in these areas.*
- *Develop Localised Planning Statements for the Bellarine Peninsula, Macedon Ranges, Mornington Peninsula and the Yarra Valley and Dandenong Ranges.*

At **Clause 12 Environmental and Landscape Values** planning is to assist to *"conserve areas with identified environmental and landscape values"* and *"protect, restore and enhance sites and features of nature conservation, biodiversity, geological or landscape value."*

Clause 12.05-1S Environmentally Sensitive Areas has the objective "To protect and conserve environmentally sensitive areas." The Macedon Ranges is identified as an area with significant conservation and recreational value under this clause.

Clause 12.05-2S Landscapes has the objective *"To protect and enhance significant landscapes and open spaces that contribute to character, identity and sustainable environments."*
The relevant strategies are:

- *Ensure development does not detract from the natural qualities of significant landscape areas.*
- *Improve the landscape qualities, open space linkages and environmental performance in significant landscapes and open spaces, including green wedges, conservation areas and non-urban areas.*
- *Recognise the natural landscape for its aesthetic value and as a fully functioning system.*
- *Ensure important natural features are protected and enhanced.*

Clause 15 Built Environment and Heritage requires that:

- *Planning should ensure all land use and development appropriately responds to its surrounding landscape and character, valued built form and cultural context.*
- *Planning should protect places and sites with significant heritage, architectural, aesthetic, scientific and cultural value.*
- *Planning should promote development that is environmentally sustainable and should minimise detrimental impacts on the built and natural environment.*

Clause 15.03 Heritage has the objective to conserve places of heritage significance. Strategies reflecting this and are of relevance to this application are:

- *Provide for the protection of natural heritage sites and man-made resources.*
- *Provide for the conservation and enhancement of those places that are of aesthetic, archaeological, architectural, cultural, scientific or social significance.*
- *Encourage appropriate development that respects places with identified heritage values.*

Clause 17 Economic Development notes that "Planning is to contribute to the economic wellbeing of the state and foster economic growth by providing land, facilitating decisions and resolving land use conflicts, so that each region may build on its strengths and achieve its economic potential"

Clause 19 Infrastructure contains the following relevant policies:

- *Planning should facilitate efficient use of existing infrastructure and human services. Providers of infrastructure, whether public or private bodies, are to be guided by planning policies and should assist strategic land use planning.*
- *Planning should minimise the impact of use and development on the operation of major infrastructure of national, state and regional significance, including communication networks and energy generation and distribution systems.*

Clause 19.03-4S Telecommunications is particularly relevant to this application. It has the following objective:

- *To facilitate the orderly development, extension and maintenance of telecommunication infrastructure.*

The following Strategies are relevant to this application:

- *Facilitate the upgrading and maintenance of telecommunications facilities.*
- *Ensure that modern telecommunications facilities are widely accessible to business, industry and the community.*
- *Ensure the communications technology needs of business, domestic, entertainment and community services are met.*

RESPONSE

Telecommunications infrastructure is vital to the economy of the State of Victoria and the operations of a number of key service providers and authorities, including Western Water and the CFA. Therefore, the construction of a new tower to replace the previous collapsed tower accords with those policies and will ensure the safety of residents in the region as well as cover important telecommunications gaps which Western Water and the CFA are currently experiencing.

Similarly, the proposal accords with policies that relate to the environment, cultural and heritage significance and significant landscape areas as the new tower will be lower in height to the previous and of a similar design, and therefore the visual impact will be minimised from its previous state. Existing infrastructure on site, including access tracks and telecommunication lines, will be utilised to ensure that no extra works will need to be undertaken beyond the minimum extent necessary.

As such, in reducing the tower height through using more modern technology and equipment, this proposal balances the importance of telecommunications infrastructure with the need to protect important landscapes.

5.2 Local Planning Policy Framework (LPPF)

Clause 21.02 Key Issues and Influences identifies the role of the Macedon Ranges Planning Scheme in managing development and the protection of environments and landscapes throughout the Shire. At Clause 21.02-2 Environment and Landscape Values identifies the key influences that relate to the (relevant) environment and landscapes are:

- *The undulating topography, geological and geomorphological features and private and public forested and grassed areas contribute to the significant landscapes within the municipality.*

- *Mount Macedon Regional Park, Black Forest, Cobaw Forest, Wombat Forest and bushland areas in the south of the Shire are highly significant natural resources with environmental (flora, fauna and habitat) values.*

Clause 21.03 Vision and Strategic Framework sets out the Shire's municipal vision. This vision is *'to provide leadership in this inspiring region by providing the opportunity for all to live a fulfilling life, while continuing to protect our heritage, environment and sense of community through our shared commitment to a sustainable Macedon Ranges'.*

The clause goes on to identify the Shire's land use vision, which in part states *"Development complements the nature and character of the rural landscapes of the Shire. Landscapes, in particular the landscapes around Mount Macedon and Woodend, are highly valued by residents and visitors and facilitate tourism which plays a key economic role in the Shire."*

Moreover, natural resources and environments and their continuing contribution to its economic and social well-being are integral to the Shire's quality of life, economy and cultural and community identities. The quality of the natural environment is an important factor that has led to continuing population growth in the Shire.

Clause 21.05 Environment and Landscape Values provides local content to Clause 12 of the PPF, and identifies the Macedon Ranges' environment as being a fundamental element of the Shire's attractiveness, and as a rural living and recreation area.

In addition, **Clause 21.05-2 Significant environments and landscapes** seeks to maintain the features of Macedon Ranges Shire that make it attractive to visitors and residents alike. The planning scheme identifies that landscapes of the Macedon Ranges are under continuous pressure owing to the municipality's proximity to Melbourne. Competing demands may erode the landscapes that provide for nature conservation, recreation, vegetation protection. Balance is sought through the following (relevant) objectives:

- Objective 1: To maintain and enhance the existing rural landscapes.
    - *Ensure development and works complement the Shire's rural landscape character; and*
    - *Retain and enhance the environmental and landscape features of forest residential areas by applying density and vegetation controls, and requiring high quality siting and design standards for all buildings and works.*
- Objective 4: To maintain and enhance the ranges, major hills and ridges as significant visual backdrops to the Shire.
    - *Avoid development on prominent ridgelines and hilltops and ensure development within view sheds to the Shire's backdrop of ranges, hills and ridges does not detract from their significance as a land range feature.*
- Objective 6: To protect the character of visually sensitive areas such as roadsides, rail corridors and water courses.
    - *Ensure buildings and works are designed and sited so that landscape values, natural features and important vistas including significant stands of cypress hedges are not degraded.*

- *Ensure building siting, form and design is sympathetic to the landscape character of the surrounding area.*

Clause 21.08-3 Built Environment contains the following objectives that are relevant to this application:

- *To promote development that respects the rural character and high landscape values of the municipality.*
- *To protect and enhance the existing character and form of the Shire's towns.*
- *To ensure development and built form occurs in a sustainable manner.*

Clause 22.01 Macedon Ranges and Surrounds is a significant and relevant clause in the Macedon Ranges Shire area. Although the Macedon Ranges Localised Planning Statement will replace it in the near future, it should still be considered.

The policy is directed primarily to the planning and management necessary for the conservation and utilisation of the policy area both as a water catchment for urban and local supply and as a location of State, metropolitan and local importance for leisure activities and nature conservation. Protection and utilisation of the resources of the policy area for water supply, tourism and recreation, and nature conservation must be the primary concern. Planning and management of the resources of the policy area must take into account not only the interests of the Victorian community but also the needs and views of the local community.

With specific relation to Infrastructure, the policy is that:

- *Provision of drainage, sewerage, utilities and social services in keeping with the special demands and restraints placed upon the policy area.*

RESPONSE

The LPPF puts strong emphasis on the protection of Macedon Ranges Shire's landscapes for their conservation, recreation and scenic attributes, as well as their attributes as a natural resource – particularly water supply catchments. The planning scheme therefore identifies that the landscapes of the Macedon Ranges are of State significance and are distinctive. The LPPF also seeks to balance the growing demand for urban development in the region against the need to protect the Shire's important natural resources.

It is submitted that this proposal is an appropriate response to the LPPF as it balances the location of the tower in a significant landscape area against the need to provide critical infrastructure for the wider community.

As highlighted throughout this report, the proposed monopole tower is in essence a replacement of a previous tower. The replacement tower is some 5m shorter than the previous structure and therefore its visibility will be reduced in the landscape. The replacement tower will also ensure the sustainable management of Western Water's and other local organisations communication needs.

As highlighted in Section 4 of this report, other options to co-locate services or to construct new infrastructure were not feasible and would result in undesirable impacts both for the protection of landscapes (and the quality and reliability of the communication transmitted.

No vegetation removal or significant works are to occur on site to bring infrastructure to the new tower, as all existing services on site will be utilised as this site has a 30 year history of hosting telecommunications equipment.

It is therefore submitted that a replacement tower that is shorter than the previous with little to no other infrastructure upgrades nor vegetation removal required provides for an appropriately balanced outcome.

5.3 Zone

The site is zoned Public Parks and Recreation Zone (Clause 36.02). The purpose of the Public Park and Recreation Zone (PPRZ) is:

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To recognise areas for public recreation and open space.*
- *To protect and conserve areas of significance where appropriate.*
- *To provide for commercial uses where appropriate.*

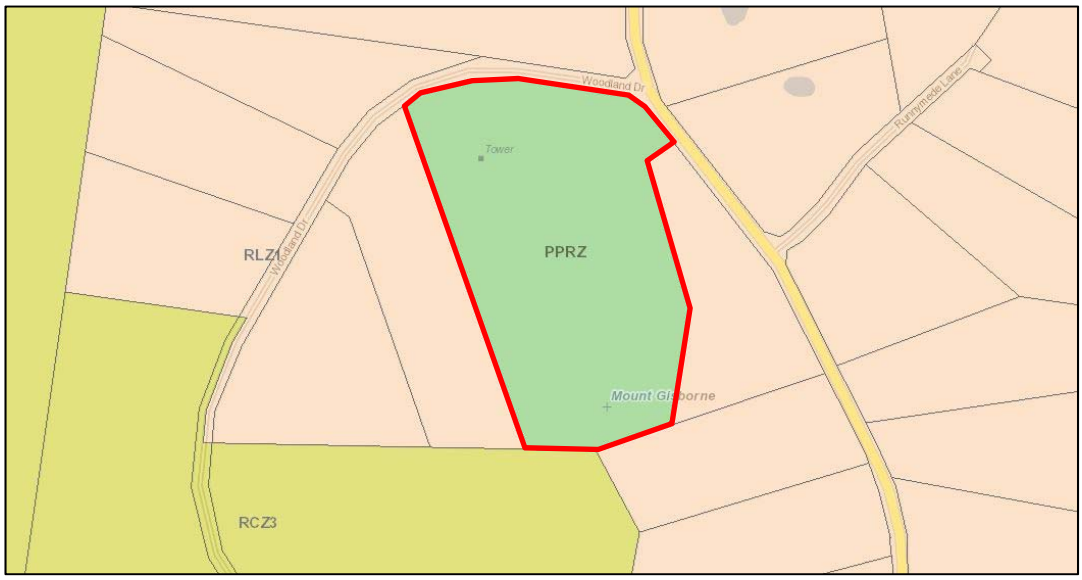

Figure 11: Site Zoning

Permit Requirements

At Clause 36.02-1 Table of Uses, the use of the land for the purpose of a telecommunications facility does not trigger the need for a permit provided the buildings and works meet the requirements of Clause 52.19 (Telecommunications facility)

A planning permit is however required to construct a building or carry out works as the works are not being carried out by or on behalf of the public land manager being Macedon Ranges Shire Council.:

Clause 36.02-3 - Application requirements

An application for a permit by a person other than the relevant public land manager must be accompanied by the written consent of the public land manager, indicating that the public land manager consents generally or conditionally either:

- To the application for permit being made.
- To the application for permit being made and to the proposed use or development.

Clause 36.02-5 Decision Guidelines

Before deciding on an application for buildings and works in this zone decision guidelines include the Municipal Planning Strategy and the Planning Policy Framework, any comments from the public land manager and whether the development is appropriately located and designed, including in accordance with any relevant use, design or siting guidelines.

RESPONSE:

Liaison with the relevant officers within the Macedon Ranges Shire Council has commenced and Council formal consent as the public land manager is sought through this application process given that the public land manager is also the Responsible Authority for the purpose of the Planning Permit.

As previously outlined, the proposal replaces the previous tower with a lower, less intrusive tower that will enable important communications to be received across the municipality by our essential services.

An environmental management plan has previously been prepared in acknowledgement of the significant landscape the site sits within. Those management objectives will continue to be met both during the re construction and for the ongoing management of the tower and any appropriate adjustments to the plan can be made as any condition requirement of this approval.

5.4 Overlays

The subject site is covered by the Environmental Significance Overlay – Schedule 5 and the Significant Landscape Overlay – Schedule 2. A response to both overlays is provided below.

Clause 42.01 Environmental Significance Overlay – Schedule 5 (ESO5)

This site is covered by the Environmental Significance Overlay – Schedule 5.

The purpose of the overlay is;

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To identify areas where the development of land may be affected by environmental constraints.*
- *To ensure that development is compatible with identified environmental values.*

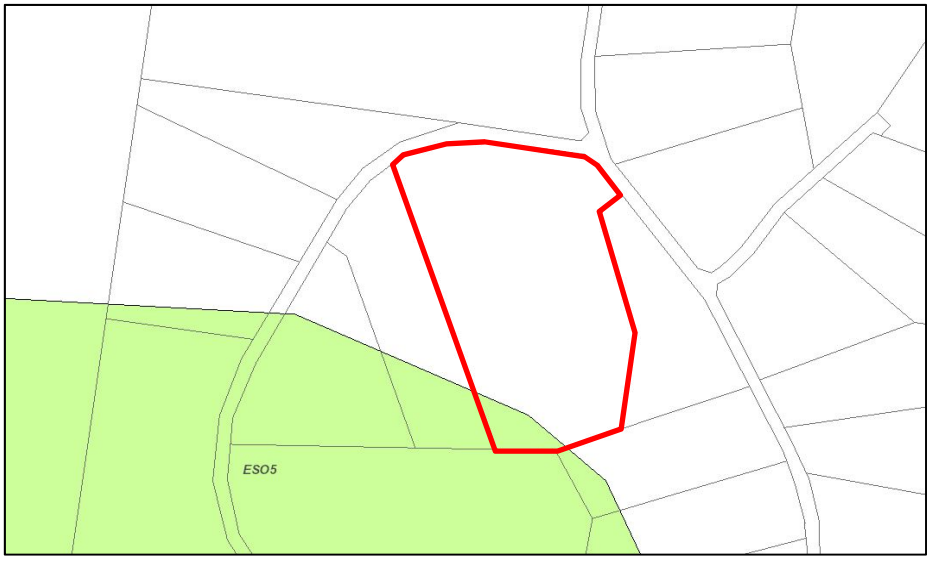

Figure 12: Environmental Significance Overlay extent

Clause 42.01-2 Permit Requirement

No permit is required for buildings and works except for:

- Accommodation (including a Dwelling) which is not connected to reticulated sewerage.
- Buildings and works for Intensive animal husbandry.

RESPONSE:

As the proposal is not for an accommodation use, and no septic system is required, no permit is required under this overlay.

Clause 42.03 Significant Landscape Overlay – Schedule 2

The site is covered by the Significant Landscape Overlay – Schedule 2.

The purpose of this overlay is;

- *To implement the Municipal Planning Strategy and the Planning Policy Framework.*
- *To identify significant landscapes.*
- *To conserve and enhance the character of significant landscapes.*

Schedule 2 to the overlay relates to 'Ridges and Escarpments'.

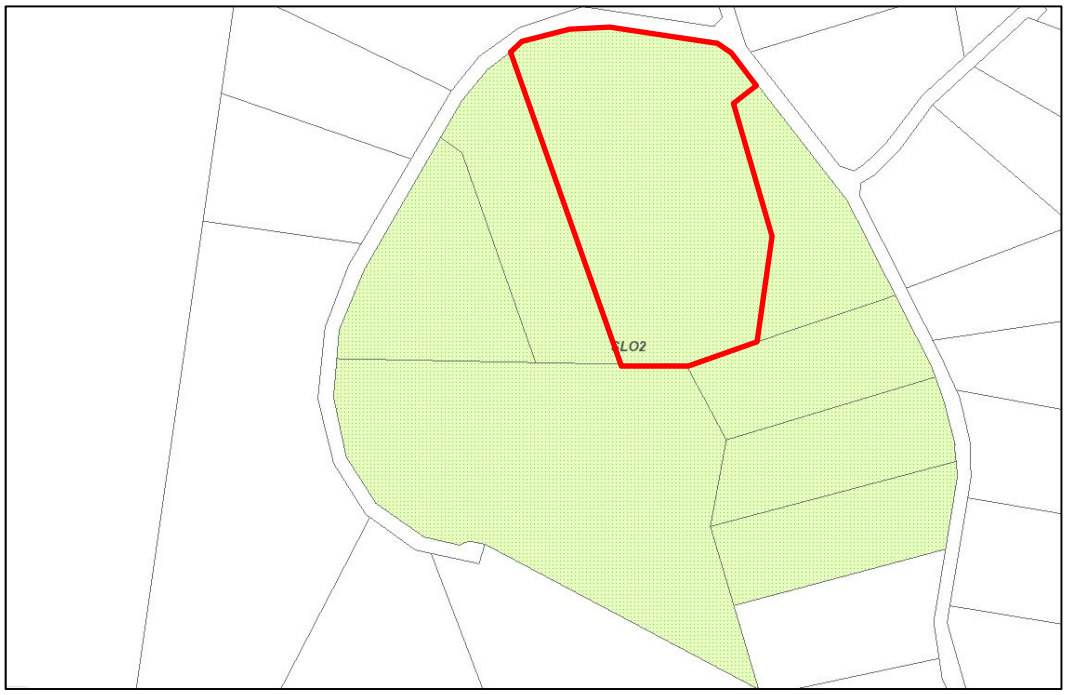

Figure 13: Significant Landscape Overlay extent

Statement of nature and key elements of landscape

Ridgelines and escarpments are significant environmental and landscape features of the Macedon Ranges Shire. The landscape character includes moderate to steep sloping hills which often form a transitional region between the true highlands and flatter plains. Within this context, rocky outcrop, ridges and escarpments, often associated with significant watercourses, create distinctive focal and visual elements across the Macedon Ranges.

The features identified in this overlay include Jim Jim and Mount Gisborne (Mount Gisborne is relevant to this application).

Mount Gisborne

Mount Gisborne is an ancient volcano vent and a distinct landscape feature viewed from the Calder Highway. The cleared surface of the hills accentuates its form. It is a recognised regional landmark feature and a vista feature from Gisborne. Being comparatively high it can be seen from many points within the Gisborne area.

One of the most distinctive attributes of Mount Gisborne, its natural form with patches of eucalyptus, is being eroded by the competing textures and form of buildings and exotic tree plantings on the higher up-slopes.

Landscape character objective to be achieved

To ensure that the siting and design of buildings and works in rural areas (including the choice of building materials) is responsive to the landscape character of the Macedon Ranges Shire.

To maintain vegetation on escarpments and ridgelines for its landscape value.

To control the location and visual impact of buildings by requiring adequate setbacks from cliff tops, ridgelines and other prominent areas.

Clause 44.01-2 Permit Requirement

A permit is required to construct a building or construct or carry out works.

Application requirements (as specified in the Schedule):

The responsible authority may require applications to contain the following information:

- *A plan of the whole site indicating the location of existing and proposed buildings and points of vehicle access to the site.*
- *A plan indicating the size, bulk and colour of any proposed buildings.*
- *A plan indicating all existing vegetation on the property and the extent of proposed clearance.*
- *The purpose of the proposed, clearing and any proposals for revegetation, including proposed species and ground stabilisation.*
- *A building must not be constructed on or within 10 metres of a ridgeline unless no alternative siting is available.*
- *Assessment of the site with respect to the Macedon Ranges Cultural Heritage and Landscape Study – June 1994.*

RESPONSE:

The proposed replacement tower will require a permit under this overlay. As highlighted throughout this report, the construction of the replacement telecommunications tower balances both the need to protect significant landscapes and the natural values of the Shire against the need to provide essential infrastructure. The overlay specifically highlights Mount Gisborne as a key landscape feature to be protected.

As explained throughout this report, the proposal is for a shorter tower in the same location as the previous tower which had failed. In response to the landscape characteristics to be achieved, the following is submitted in support of the replacement tower:

- The construction of the replacement tower will result in a shorter tower utilising existing services and infrastructure on site there will be minimal visual disturbance. Materials and colours will be muted and non-reflective and will correspond to other telecommunications infrastructure built around Victoria.
- Neither the siting nor construction of the tower will require vegetation removal.
- Construction will result in minimal risk of erosion or environmental degradation therefore ensuring minimal land disturbance.
- As the new tower will require minimal maintenance, it is submitted that the ongoing operation and routine inspections of the structure will result in minimal erosion at the mount summit.
- The tower will be sited in the same position as the previous tower thereby retaining previous setbacks from ridgelines on Mount Gisborne.
- The tower is a slim tower by design and is largely screened by existing vegetation as was the previous tower albeit that this replacement tower will be shorter than the previous and therefore provide for a lesser visual intrusion.

- Other sites were considered for the tower, however it was deemed that the required infrastructure would result in taller telecommunication towers in other areas, or significant upgrades at other sites.

In response to the Application Requirements, the following is submitted:

- For plans detailing the design, siting and setbacks of the proposed replacement monopole tower, please refer to Appendix B and C.

- No vegetation is required to be removed to site the tower, before, during and after construction.

- The structure is to be constructed within the footprint of the previous tower, and therefore its position will be unchanged.

  Western Water have investigated rerouting the required data via the Riddle Road Tank and Magnet Hill Tank, but substantial upgrades would be required with very high communication structures. The towers would be located in the shire boundaries with high visual impact.

  Although existing communications infrastructure is located at the adjacent property the replacement tower cannot be placed nearer or within as detailed investigation by Western Water following the tower collapse found the existing planted trees will inhibit the operation of the Microwave links. Microwave radios rely on unobstructed line of site and therefore any other location near or in the adjacent property would require an increased tower height higher than the original or significant vegetation removal on private land which would not be desirable for that landowner.

- The *Macedon Ranges Cultural Heritage and Landscape Study (1994)* is a Reference document to Clause 21.05 and is required to be responded to under this SLO. The study recognises Mt Gisborne as a regional landmark feature and a vista feature. We summarise the excerpt as follows:

  - Mt Gisborne and Mt Aitken are distinctive landmark features viewed from the Calder Highway and other locations within the study area. The cleared surface of the hills accentuates their form.

  - Of particular relevance is this excerpt:

    The awareness of height is noticeable from most of the landscape unit, with views southwards to metropolitan areas from a number of locations, and views across the forested gullies of Wombat State Forest. Travelling views are experienced from all roads with unfolding landscape of terrain features, farm scapes and views across to the Mount Macedon massif, the Black Range and Mount William Range from many locations. In the western area the scenery has pockets of enclosure due to remnant bushland verges with overhanging canopies which alternate with the open scenery. The remnant bushlands and even individual mature eucalypts link the landscape of today with its original vegetation and provide habitat for native fauna.

    The spatial delineation of the landscape is distinctive, reflecting the allotment subdivision of recent times and of the 1850s. Pine and Cypress windbreaks with mature size and texture denote the location of older homesteads while young boundary plantings of Cypresses outline more recently developed 'farmlet' properties. Interspersed amongst newer fences and gates, old style fences with gates, windbreaks, and drystone walls, associated with historic properties such as Gisborne Park. Such historic elements provide interest, texture and a sense of time depth.

  - The landscape study identifies the Calder Highway as a harsh construction that is busy, noisy and dominant and that the exit ramps a massive works unsympathetic with the landscape setting and scale of buildings and structures in the locality.

  - Ideas and actions include discouraging cypress plantings along road side boundaries and encouraging native trees that would allow for travelling views of the country side between the clean trunks and developing a public recreation area on Mount Gisborne with viewing stations.

  In response to the contents of the *Macedon Ranges Cultural Heritage and Landscape Study (1994)* it is submitted that the proposal is a responsive outcome to the above landscape responses for the following reasons:

    - At the time of writing the study, the previous tower would have been in place and its siting and context upon the Mount would have been taken into consideration as part of the study.

    - The tower will be lower in height when compared to the previous tower located on the site.

    - No vegetation removal is required to construct, site or maintain the tower.

- All existing access and telecommunications infrastructure will be utilised on site.
- A number of alternative sites have been considered to site the telecommunications infrastructure required, however it was deemed that upgrades and new infrastructure elsewhere would be visually and environmentally intrusive well beyond the extent that a shorter tower at the current location would become.

The decision guidelines of the SLO2 are outlined below, and a response provided.

Decision Guidelines	Response
The Municipal Planning Strategy and the Planning Policy Framework	These matters have been responded to in Section 5.1 and Section 5.2 of this report.
The statement of the nature and key elements of the landscape and the landscape character objective contained in a schedule to this overlay.	This has been addressed in this section of the report.
The conservation and enhancement of the landscape values of the area.	The proposed replacement tower will result in an improved outcome for the site in terms of the monopole being significantly lower than the previous tower constructed upon Mount Gisborne. Moreover, no further infrastructure upgrades are required on site to locate the tower and all existing infrastructure will be utilised. In considering the above, the replacement tower has been designed to respect the landscape of the area, and results in an improved and sustainable outcome for the site which has been used for telecommunications purposes for over 30 years.
The need to remove, destroy or lop vegetation to create a defendable space to reduce the risk of bushfire to life and property.	No vegetation is required to be removed or lopped. The tower site has been clear for some time.
The impact of the proposed buildings and works on the landscape due to height, bulk, colour, general appearance or the need to remove vegetation.	As highlighted throughout this report, the proposal will result in a lower tower height that utilises existing infrastructure on site. The tower will be constructed of muted and non-reflective colours and materials similar to that of other telecommunications infrastructure throughout the Shire and State. No vegetation will be removed.
The extent to which the buildings and works are designed to enhance or promote the landscape character objectives of the area.	This has been responded to throughout the body of this report.
The impact of buildings and works on significant views.	The lower height of the proposed replacement tower compared to the previous tower is an improved outcome in terms of views to and from Mount Gisborne. As detailed in Section 4 in this report, the tower will be adequately setback and screened from other neighbouring properties.
Any other matters specified in a schedule to this overlay.	As detailed above.

Table 3: SLO Decision Guidelines

5.5 Particular Provisions: Clause 52.19 Telecommunications Facility

The purpose of this clause is:

- *To ensure that telecommunications infrastructure and services are provided in an efficient and cost effective manner to meet community needs.*
- *To facilitate an effective statewide telecommunications network in a manner consistent with orderly and proper planning.*
- *To encourage the provision of telecommunications facilities with minimal impact on the amenity of the area.*

Clause 52.19-1 Permit requirement

A permit is required to construct a building or construct or carry out works for a Telecommunications facility.

Exemptions in the clause do not apply to this facility.

Clause 52.19-5 of the Planning Scheme lists the information to be submitted with any application. The required information includes a site analysis and design response explaining how the proposed facility addresses the principles of design, siting, construction and operation of telecommunications facility, as contained in the Code of Practice.

Before deciding on a permit application under clause 52.19, Council must also consider:

- The decision guidelines under Clause 65 of the Planning Scheme.
- The principles for the design, siting, construction and operation of a Telecommunications Facility set out in *A Code of Practice for Telecommunications Facilities in Victoria*.
- The effect of the proposal on adjacent land.
- If the Telecommunications facility is located in an Environmental Significance Overlay, a Vegetation Protection Overlay, a Significant Landscape Overlay, a Heritage Overlay, a Design and Development Overlay or an Erosion Management Overlay, the decision guidelines in those overlays and the schedules to those overlays.

RESPONSE:

The information required to be submitted with the application has been addressed in the body of this submission at Sections 5.6, 5.7, 4.3, 4.4 and 5.4 respectively to the points above and attached as an Appendix to this application.

5.6 General Provisions

General Provisions

Clause 65 Decision Guidelines state that the Responsible Authority must decide whether the proposal will produce acceptable outcomes in terms of the decision guidelines of this Clause.

Decision Guidelines	Response
The matters set out in Section 60 of the Act.	These matters have been discussed throughout the body of the report.
The Municipal Planning Strategy and the Planning Policy Framework.	These matters have been dealt with in Section 5.1 and Section 5.2 of this report.
The purpose of the zone, overlay or other provision.	It is considered that these matters have been dealt with in Sections 5.3, 5.4, 5.5, 5.6 and 5.7 of this report.
Any matter required to be considered in the zone, overlay or other provision.	As above.

Decision Guidelines	Response
The orderly planning of the area.	The proposal seeks to replace a failed monopole communications tower with a shorter tower within the same footprint of the previous. The replacement tower will therefore utilise existing infrastructure on site and will have a lesser visual impact.
The effect on the amenity of the area.	As detailed throughout this report, the replacement tower will have a limited visual impact to and from the site in terms of the monopole being shorter than the previous tower upon Mount Gisborne. Existing dwellings in proximity to the tower are topographically set below the tower and/or are screened by vegetation. Moreover, no further infrastructure upgrades are required on site to locate the tower and all existing infrastructure will be utilised. No vegetation is to be removed on site for the purposes of this proposal. In considering the above, the replacement tower has been designed to respect the amenity of the area, and results in an improved and sustainable outcome for the site which has been used for the purposes required in this submission for some 30 years.
The proximity of the land to any public land.	The site is within public land – PPRZ. A response to this zone is provided in the report. This application is seeking Council's consent for the construction of the replacement tower.
Factors likely to cause or contribute to land degradation, salinity or reduce water quality.	The siting, construction or maintenance of the tower will not result in runoff, erosion or landslip issues as the tower is being sited in its previous location making use of existing infrastructure on site, as explained throughout this report.
Whether the proposed development is designed to maintain or improve the quality of stormwater within and exiting the site.	The tower will have little to no impact on stormwater runoff.
The extent and character of native vegetation and the likelihood of its destruction.	No native vegetation will be removed as a result of the proposal.
Whether native vegetation is to be or can be protected, planted or allowed to regenerate.	The existing vegetation on site will be retained.
The degree of flood, erosion or fire hazard associated with the location of the land and the use, development or management of the land so as to minimise any such hazard.	The siting, construction or maintenance of the tower will not result in erosion or landslip issues, as explained throughout this report.
The adequacy of loading and unloading facilities and any associated amenity, traffic flow and road safety impacts.	Not applicable.

Table 4: Clause 65 Decision Guidelines

5.7 Documents incorporated into this Planning Scheme - *A Code of Practice for Telecommunications Facilities in Victoria, July 2004*

A Code of Practice for Telecommunications Facilities in Victoria is an incorporated document in all planning schemes in Victoria.

The purpose of this code is to:

- *Set out the circumstances and requirements under which land may be developed for a telecommunications facility without the need for a planning permit.*
- *Set out principles for the design, siting, construction and operation of a telecommunications facility which a responsible authority must consider when deciding on an application for a planning permit.*

It aims to:

- Ensure that telecommunications infrastructure and services are provided in an efficient and cost effective manner to meet community needs.
- Ensure the application of consistent provisions for telecommunications facilities.
- Encourage an effective state-wide telecommunications network in a manner consistent with the economic, environmental and social objectives of planning in Victoria as set out in section 4 of the Planning and Environment Act 1987.
- Encourage the provision of telecommunications facilities with minimal impact on the amenity of the area.

Section 4 of the Code outlines four principles for which development of new Telecommunication Facilities must follow.

Principle	Application of Principle *(where relevant)*	Response
Principle 1 A Telecommunications facility should be sited to minimise visual impact.	A telecommunications facility should be located so as to minimise any interruption to a significant view of a heritage place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land. Equipment associated with the telecommunications facility should be screened or housed to reduce its visibility. The relevant officer of the responsible authority should be consulted before any street tree is pruned, lopped, destroyed or removed.	As detailed throughout this report, the replacement tower will have a limited visual impact to and from the site in terms of the monopole being significantly shorter than the previous tower constructed upon Mount Gisborne. Existing dwellings in proximity to the monopole tower are geographically set below the tower and/or are screened from it by vegetation. Moreover, no further infrastructure upgrades are required on site to locate the tower and all existing infrastructure will be utilised. No vegetation is to be removed on site for the purposes of this proposal. In considering the above, the replacement tower has been designed to respect the landscape of the area, and results in an improved and sustainable outcome for the site which has been used for telecommunications purposes for over 30 years.

Principle	Application of Principle *(where relevant)*	Response
Principle 2 Telecommunications facilities should be collocated wherever practical.	Wherever practical, telecommunications lines should be located within an existing underground conduit or duct. Overhead lines and antennae should be attached to existing utility poles, towers or other radio communications equipment to minimise unnecessary clutter.	The proposed replacement tower contains the co-location of services for other authorities and businesses within the area. The tower will make use of the existing telecommunications infrastructure available on site that serviced the previous tower.
Principle 3 Health standards for exposure to radio emissions will be met.	A telecommunications facility must be designed and installed so that the maximum human exposure levels to radio frequency emissions comply with Radiation Protection Standard – Maximum Exposure Levels to Radiofrequency Fields – 3kHz to 300 GHz, Arpansa, May 2002.	The tower shall be constructed to the required State and Federal health standards and legislation.
Principle 4 Disturbance and risk relating to siting and construction should be minimised. Construction activity and site location should comply with State environment protection policies and best practice environmental management guidelines.	Soil erosion during construction and soil instability during operation should be minimised in accordance with any relevant policy or guideline issued by the Environment Protection Authority. Construction should be carried out in a safe and effective manner in accordance with relevant requirements of the Occupational Health and Safety Act 1985. Obstruction or danger to pedestrians or vehicles caused by the location of the facility, construction activity or materials used in construction should be minimised. Where practical, construction should be carried out during times that cause minimum disruption to adjoining properties and public access. Traffic control measures should be taken during construction in accordance with Australian Standard AS1742.3 – 2002 Manual of uniform traffic control devices – Traffic control devices on roads. Open trenching should be guarded in accordance with Australian Standard Section 93.080 – Road Engineering AS 1165 – 1982 – Traffic hazard warning lamps. Disturbance to flora and fauna should be minimised during construction and vegetation replaced to the satisfaction of the land owner or responsible authority at the conclusion of work. Street furniture, paving or other existing facilities removed or damaged during construction should be reinstated (at the telecommunication carrier's expense) to at least the same condition as that which existed prior to the telecommunications facility being installed.	As explained throughout this submission, the construction, siting and ongoing maintenance of the tower will require absolute minimal disturbance to the site as the structure will be placed within the footprint of the previous tower on site. Construction management issues and amenity and environmental effects stemming from the above can addressed at detailed design and construction phases as outlined in a condition of the planning permit.

Table 5: Response to *A Code of Practice for Telecommunications Facilities in Victoria*

6 Conclusion

The proposed 17.5m high telecommunications tower has been assessed against the Planning Policies and Provisions of the Macedon Ranges Planning Scheme, including policies that seek to balance the need to provide infrastructure and protect key significant landscape values. It has also been assessed against *A Code of Practice for Telecommunications Facilities in Victoria.* It is submitted that the proposal can be supported on the following grounds:

- The proposal is in essence a replacement of the previous tower that failed in July 2019. The new tower however will be shorter in height than the previous, and yet will host the same communications equipment and abilities for the various organisations that utilise it, including Western Water and the CFA.

- As the structure will be sited within the footprint of the previous and owing to its shorter height, there will be minimal visual or environmental impact upon Mount Gisborne which has a relative long history of hosting telecommunications infrastructure that provides vital services to the region.

- Other sites have been considered, however extensive earthworks and taller equipment would be required for upgrades at those other locations. As such, the tower will be sited in the most appropriate location given the context of the local area and service objectives - providing telecommunication services to Western Water and the CFA in times of emergency.

- The visual impact of the development on the surrounding area and the adjoining residences has been assessed and given the reduced height and using the same siting as the previous tower, the proposal is considered unlikely to cause any significant harm to the visual amenity or scenic value of the area as a tower of a taller height existed in the same location for over 30 years.

- Although the facility would be visible at varying degrees depending on the line of site of the viewer, negative impacts on visual amenity or the scenic values of the area are not deemed to be significant given the existing telecommunication facilities and residential development on Mount Gisborne.

Accordingly, it is considered that the visual impact of the proposal is acceptable having had full regard to the context of the locality, the nature of the design employed, and the net-community benefits deriving from the reinstallation of this key piece of Western Water's infrastructure.

The proposal is also consistent with the stated objectives of the Macedon Ranges Planning Scheme. It is considered that the proposal will provide an important community benefit to the wider Macedon Ranges area.

We respectfully request that Council considers the limited impacts and expected benefits of this proposed facility, given that it is essentially a replacement tower which is shorter in height and uses existing site infrastructure, and that the proposal should be supported.