

14 March 2023

The Occupant

Proposal: Replacement Telecommunications Facility
Address: Royal Canberra Golf Club
71 Bentham Street
Yarralumla ACT 2600
Block 2 Section 119 Division Yarralumla
WA Number: 102744

Dear Sir/Madam,

Indara Digital Infrastructure ('Indara' - previously known as **Axicom**) currently owns a telecommunications facility at 23 Banks Street Yarralumla; however, due to the Owner's plans to re-develop the land, it is necessary for the existing Indara facility to be removed.

This existing facility provides essential mobile communications services (mobile phone and data connections) to the area of Yarralumla - including residents, Parliamentary Offices and Embassies. It is essential that a replacement facility be installed to ensure that mobile communications services in this area are not lost.

The new location for the replacement facility needs to be in close proximity to the existing facility - to ensure that services to the same area are maintained.

Indara has undertaken extensive investigations to identify a new location for the replacement facility - a location where the landowner is willing to enter into a lease arrangement for a portion of their land and where existing services would be maintained. Indara also sought to identify a location as far from existing residences as possible.

Given the residential nature of much of the Yarralumla area, finding a new location in the near vicinity of the existing facility was challenging; however, Indara has identified a site within the grounds of the Royal Canberra Golf Club. Discussions with Management at the Golf Club have been fruitful and a design for the replacement facility has been proposed to the Golf Club.

Indara has lodged an 'Application for Works Approval' for the proposal with the National Capital Authority (NCA) who are responsible for assessing the application; and is also undertaking a community consultation to notify residents in the area of the proposal.

I am now writing on behalf of Indara to inform you of the proposal to replace the existing mobile phone base station located at 23 Banks Street Yarralumla ACT 2600 to a new site at the Royal Canberra Golf Club.

Confirmation of the specific location of the proposed replacement facility (with regard to the existing facility and the Golf Club) is provided in **Figure 1**.



Figure 1. Locations of the existing and proposed Indara telecommunications facilities

The replacement Indara facility involves:

- construction of one (1) new Indara telecommunications compound with security fencing and 3m-wide double access gates
- installation of one (1) new 40.0m monopole
- installation of three (3) new headframes on the monopole
- installation of Telecommunications Carriers' antennas and equipment
- installation of new equipment shelters for the Telecommunications Carriers
- ancillary works necessary for the effective and safe operation of the facility

The Royal Canberra Golf Club manages extensive grounds for use by Golf Club members and visitors. As can be seen in the photo below (please refer to **Figure 2**), the grounds extend all the way to the Molonglo River.



Figure 2. Extent of Royal Canberra Golf Club

However, while the grounds are extensive, the land slopes downhill significantly towards the River. This change in topography had a substantial impact on where the replacement facility could be located. From the entrance to the Golf Club to the Molonglo River, there is a drop in elevation of 30m across the Course.

Therefore, a location at the highest elevation was considered most appropriate - if a site could be identified that would further limit the visual impact.

In addition, the Golf Course is situated on land identified as an heritage item, 'Westbourne Woods' under ACT Heritage. Portion of the Woods has been developed for use as the Golf Course; however, due to the existing heritage value of the Golf Course, it was not possible to locate a facility within the heritage site boundaries.

Indara is conscious of limiting the visual impact of the proposal. After much discussion with the Management of the Club, the site at the entrance to the Club was selected. A photomontage of the proposed facility is provided (please refer to **Figure 3**) - showing that the selected site is very favourable as a location.



Figure 3. Photomontage showing the location within the group of trees (photo taken from the Golf Club gate)

As can be seen, the tall mature trees provide significant screening for the facility, minimising the visual impact.

Additional photomontages are also provided (please refer to **Figures 4-6**) - further showing the limited visual impact of the proposal due to the mature trees surrounding the selected site.



Proposed Indara Facility

Figure 4. View from Bentham Street, looking north-west towards the Golf Course Clubhouse



Proposed Indara Facility

Figure 5. View from the corner Denman Street and Woolls Street

Proposed Indara Facility



Figure 6. View from Lane-Poole Place. NB - the Indara structure is visible only above the tree tops

As the photomontages indicate, the proposed facility would be significantly screened from the surrounding residential areas because of the tall mature trees.

Indara intended to provide additional photomontages from locations at Banks Street and the corner of Banks Street and Wilf Crane Crescent; however, the proposed facility would not be visible from these locations - also due to the dense tree coverage.

The replacement Indara facility would maintain existing services and provide enhanced 4G and new 5G services to the Yarralumla area. The proposed infrastructure will comply with the ACMA EMR regulatory arrangements. The maximum accumulative EME level for the site can be found in the attached EME report.

If you require additional information regarding electro-magnetic emissions (EME) or would like to understand more about 5G technology, I refer you to the following websites:

<http://www.emfexplained.info/>

<https://www.arpansa.gov.au/news/5g-new-generation-mobile-phone-network-and-health>

<https://www.arpansa.gov.au/news/misinformation-about-australias-5g-network>

<https://amta.org.au/>

Indara has published information about the proposed facility in a newspaper circulating in the local area. The Indara notification was published in the **Canberra Times** on **Monday 6 March 2023**.

You are invited to provide comment about this proposal. Comments on the proposal will be accepted until **Tuesday 28 March 2023**.

Please send your comments to:

Liz Easton on the details provided below

Or

National Capital Authority WAconsultation@nca.gov.au
GPO Box 373
Canberra ACT 2601

Please contact either Liz Easton on the details provide below, or the National Capital Authority on (02) 6271 2888, if you require additional information.

Regards,



Liz Easton
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a: HWT Tower: L6, 40 City Road Southbank Melbourne 3006

Attached: ARPANSA EME Report

Frequently Asked Questions

Where is it being installed?	The replacement facility is to be located at the Royal Canberra Golf Club 71 Bentham Street Yarralumla Act 2600
What is being installed and how big will it be?	<p>The proposal involves:</p> <ul style="list-style-type: none"> • construction of one (1) new Indara telecommunications compound with security fencing and 3m-wide double access gates • installation of one (1) new 40.0m monopole • installation of three (3) new headframes on the monopole • installation of Telecommunications Carriers' antennas and equipment • installation of new equipment shelters for the Telecommunications Carriers • ancillary works necessary for the effective and safe operation of the facility
Does it require Council approval?	<p>Yes. An Application for Works Approval has been submitted to the National Capital Authority for assessment.</p> <p>Community notification is being undertaken in accordance with ACT Planning Regulations.</p>
Does it comply with Australian Standards for Electromagnetic Energy (EME)?	<p>The facility will comply with Australian government regulations in relation to emission of electromagnetic energy (EME) as contained in the Radiation Protection Series – S1. (Standard for Limiting Exposure to Radiofrequency Fields – 100 KHz to 300 GHz), published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in 2021.</p> <p>Further information is available at:</p> <p>https://www.arpansa.gov.au/regulation-and-licensing/regulatory-publications/radiation-protection-series/codes-and-standards/rpss-1</p>
How can I find out where the base stations are in my area?	<p>A database of all existing and proposed mobile phone base stations in Australia is available to the public at:</p> <p>www.rfnsa.com.au</p>
Where can I find out more information?	<p>Support information about mobile phone base stations, the Industry Code C564:2020, your rights, health is available from this website:</p> <p>https://www.commsalliance.com.au/popular-links/mobile-phone-tower-information</p>

How can I provide feedback on the proposal or find out more information?	<p>Liz Easton m: +61 406096756 e: liz@sitelogic.net.au a: HWT Tower: L6, 40 City Road Southbank Melbourne 3006</p> <p>or</p> <p>WAconsultation@nca.gov.au GPO Box 373 Canberra ACT 2601</p> <p>Comments Closing date: Tuesday 28 March 2023</p>
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Information about this proposal is available in other languages which is available on request from the contact details provided

Environmental EME Report

Location	71 Bentham Street, YARRALUMLA ACT 2600		
Date	29/11/2021	RFNSA No.	2600067

How does this report work?

This report provides a summary of levels of radiofrequency (RF) electromagnetic energy (EME) around the wireless base station at 71 Bentham Street, YARRALUMLA ACT 2600. These levels have been calculated by Lend Lease using methodology developed by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).

A document describing how to interpret this report is available at ARPANSA's website:

[A Guide to the Environmental Report.](#)


A snapshot of calculated EME levels at this site

There are currently no existing radio systems for this site.

The maximum EME level calculated for the **proposed** changes at this site is

3.28%

out of 100% of the public exposure limit, 183 m from the location.



EME levels with the proposed changes	
Distance from the site	Percentage of the public exposure limit
0-50 m	1.16%
50-100 m	1.41%
100-200 m	3.28%
200-300 m	3.11%
300-400 m	1.70%
400-500 m	0.96%

For additional information please refer to the EME ARPANSA Report annexure for this site which can be found at <http://www.rfnsa.com.au/2600067>.

Radio systems at the site

This base station currently has equipment for transmitting the services listed under the existing configuration.

The proposal would modify the base station to include all the services listed under the proposed configuration.

Carrier	Existing		Proposed	
	Systems	Configuration	Systems	Configuration
Optus			3G, 4G, 5G	NR/LTE700 (proposed), NR/LTE900 (proposed), WCDMA900 (proposed), LTE2300 (proposed), NR/LTE2600 (proposed), NR/LTE1800 (proposed), NR/LTE2100 (proposed), NR3500 (proposed), NR2300 (proposed)
Vodafone			3G, 5G	NR/LTE700 (proposed), NR/LTE850 (proposed), NR/LTE1800 (proposed), WCDMA900 (proposed), NR/LTE2100 (proposed), NR3500 (proposed), NB-IOT900 (proposed)

An in-depth look at calculated EME levels at this site

This table provides calculations of RF EME at different distances from the base station for emissions from existing equipment alone and for emissions from existing equipment and proposed equipment combined. All EME levels are relative to 1.5 m above ground and all distances from the site are in 360° circular bands.

Distance from the site	Existing configuration			Proposed configuration		
	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
0-50m				5.69	85.92	1.16%
50-100m				6.97	129.00	1.41%
100-200m				9.54	241.27	3.28%
200-300m				9.20	224.68	3.11%
300-400m				6.91	126.54	1.70%
400-500m				5.15	70.39	0.96%

Calculated EME levels at other areas of interest

This table contains calculations of the maximum EME levels at selected areas of interest, identified through consultation requirements of the [Communications Alliance Ltd Deployment Code C564:2020](#) or other means. Calculations are performed over the indicated height range and include all existing and any proposed radio systems for this site.

Maximum cumulative EME level for the proposed configuration

Location	Height range	Electric field (V/m)	Power density (mW/m ²)	Percentage of the public exposure limit
Dwelling	0-6 m	6.42	109.30	1.18%
Golfcourse	0-2 m	5.16	70.60	0.80%
Forestry Oval	0-2 m	5.81	89.44	1.12%