

20 October 2025

██████████
██████████ Victorian Planning Authority
1 Spring Street
Melbourne Victoria 3000



Sent via email: EastofAberline@vpa.vic.gov.au

Dear ██████████

Re: AMTA submission on Amendment C217warr East of Aberline – Mobile Telecommunications Infrastructure

AMTA is the peak industry body representing Australia's mobile telecommunications sector, responsible for advancing the deployment, policy settings and public understanding of critical mobile infrastructure that underpins the nation's digital economy, population growth and essential services. AMTA members include 'Mobile Network Operators' such as Telstra, Optus and TPG Telecom, as well as 'Mobile Network Infrastructure Providers' that build and own telecommunications towers.

We thank the Victorian Planning Authority (VPA) for the opportunity to make a submission on draft 'Amendment C217warr' to the Warrnambool Planning Scheme. We are encouraged that the VPA has recognised the importance of planning for mobile network infrastructure in this precinct early in the strategic planning process. Mobile telecommunications is essential critical infrastructure underpinning safety, economic activity, and liveability.

We understand that the East of Aberline precinct in north-east Warrnambool covers 407ha and is expected to provide approximately 4,000-4,500 homes to accommodate a population of more than 12,000 people. With such a significant emerging community there will be a need for the timely and staged provision of new mobile network infrastructure to provide connectivity to residents, businesses and visitors to the area. In addition to 'coverage', mobile telecommunications networks (primarily poles and antennas) must provide enough 'capacity', because as the number of users on the network in an area increases over several years, so too will the number and density of telecommunications facilities and sites. In coming years AMTA's members will likely make significant network infrastructure investments to provide new and augmented mobile network infrastructure to service the significant community in 'East of Aberline'. Timely provision of infrastructure and service requires foresight and strategic planning, and at present there is little location/spatial guidance regarding appropriate sites for mobile network infrastructure in and around the precinct.

As the Planning Authority for the East of Aberline Precinct Structure Plan (PSP), we welcome the VPA's acknowledgement of the Telecommunications in New Developments Policy (TIND). As you will be aware, the Commonwealth Government updated the TIND policy¹ in early 2024 to include expectations for developers around consideration of mobile telecommunications earlier in the planning process for new developments.

Specifically, we welcome the inclusion on Page 56 of Guideline 45 (G45) of the East of Aberline Precinct Structure Plan. This notes that *'Above-ground utilities (such as electricity substations, sewer pump stations, telecommunications facilities, and overhead powerlines) should be identified at the subdivision design stage to ensure effective integration with the surrounding neighbourhood. This includes meeting expectations for*

¹ The 'TIND' is available at this link: <https://www.infrastructure.gov.au/department/media/publications/telecommunications-new-developments>

mobile telecommunications infrastructure under the Commonwealth's Telecommunication In New Developments (TIND) Policy'. It is our preference that the PSP provides a firmer or directive commitment given the significance of the infrastructure/service being provided, and we look forward to working to ensure that the PSP adequately provides for such infrastructure.

AMTA is also encouraged by the inclusion of Section 5.7.3 'Planning for Mobile Telecommunications' on page 101 of the East of Aberline PSP Background Report. This provides useful context for the need for inclusion of mobile infrastructure in the PSP.

We note that the East of Aberline's PSP Utility Servicing Assessment report (pages 17-18) does not make note of current, planned or future mobile telecommunications network infrastructure in the area that would be required to provide adequate mobile service in the short, medium and longer terms. However, AMTA envisages that the VPA could encourage consideration of mobile infrastructure in accordance with the TIND in similar assessment reports supporting the strategic planning for future Amendments and PSPs. To that end, we'd encourage the VPA to consider adding guidance on the process for strategic planning for mobile infrastructure in the next edition of the PSP 2.0 process and in its Precinct Structure Planning Guidelines. AMTA would welcome the opportunity to assist with this task. We also note that we have engaged in productive discussions with the Digital and Government Services Policy team at Department of Government Services regarding improvements to the guidance for developers and land development authorities.

We would welcome the opportunity to directly engage with the VPA on the details for strategic planning for mobile infrastructure in Amendment C217warr East of Aberline, as well as the opportunity to assist Planning Panels Victoria's Standing Advisory Committee in due course.

We look forward to the outcomes of the VPA's consideration of submissions. If AMTA can be of any assistance, I can be contacted on [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

Australian Mobile Telecommunications Association Ltd