
Sent: 4/08/2020 5:18:03 PM
Subject: Development Application - DA2020/0661 Proposed Telecommunications Facility North Curl Curl.
Attachments: Letter to NBCC regarding proposed telecommunications facility near Curl Curl North PS.pdf;

Please see attached submission in relation to the subject development application.

David Lewis

Principal Statutory Planner | Infrastructure Planning

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I acknowledge the traditional custodians of the land and pay my respects to Elders past and present. I also acknowledge all the Aboriginal ; Islander staff working within the Department of Education at this time.

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Chief Executive Officer
Northern Beaches Council
PO Box 82
Manly NSW 1655

By email: council@northernbeaches.nsw.gov.au
Attention: Phil Lane

Dear Sir

Development Application (DA2020/0661) for Telecommunications Facility at Lot 7356 DP1167221, Abbott Road Sportsground, North Curl Curl,

I refer to the subject development application and advise that the possibility of the construction of a telecommunications facility located approximately 300 metres from the Curl Curl North Public School has raised significant concerns within the school community.

While there is no conclusive evidence of the adverse effects of mobile telephone towers on human health at present, the Department of Education has a policy of prudent avoidance in relation to mobile telephone facilities and discourages their installation within or near government school grounds. The policy states:

“The Department of Education adopts a policy of prudent avoidance in relation to the installation of mobile telecommunications facilities within school grounds. While the Department cannot state a specific separation distance between a proposed mobile telecommunications facility and a school, the Department has a preference for a distance of at least 500 metres from the boundary of the property.”

The department’s policy has been in place since the mid-1990s and was adopted to establish a clear position for the community and for telecommunications carriers regarding the preferred location of such facilities in proximity to government schools. A 500 metre buffer between schools and telecommunications facilities, including mobile phone towers, was identified to support a precautionary approach in relation to the question of the health effects of EME and to recognise and address community opposition that was expressed whenever such facilities were proposed to be located near schools. The department consistently applies this policy when responding to notified proposals for telecommunications facilities near schools.

As was the case at the time of introduction of the policy, the level of concern in the community about adverse health effects of EME from mobile base station facilities remains significant. This is evidenced by the number of submissions Council has received regarding the current proposal.

Until there is undeniable evidence that there are no long-term public health effects from EME exposure, a precautionary approach is advised. This is recognised and imbedded in the industry best practice publications: *C564:2018 Mobile Phone Base Station Deployment Industry Code*; and *Telecommunications Facilities Guideline Including Broadband*, issued by the Department of Planning, Industry and Environment. In referring to these, carriers are required to consider 'community sensitive' locations such as schools and hospitals and consider this with other factors, such as coverage objectives and engineering requirements, when deciding on a site.

The department requests that Council, in its assessment and determination of the development application proposal, applies considerable weight to the level of community concern and land use planning intent behind the Mobile Phone Networks Code to avoid facilities from being located nearby sensitive locations such as schools. Accordingly, we request that Council require the proponent consider alternative site locations further away from the school.

Please contact David Lewis at david.lewis83@det.nsw.edu.au for any further information.

Yours sincerely

Glenn Downie
**R/Executive Director, Asset Management
School Infrastructure NSW**
August 2020