

03 April 2019

NSW Rural Fire Services
4 Murray Rose Ave
Sydney Olympic Park
NSW 2127

E-mail: records@rfs.nsw.gov.au

Attention: Nika Fomin

Dear Sir/Madam,

**Proposal to install a new Telstra mobile phone base station at: Lot 2611/-
/DP752038, located at 1 Lakeshore Drive, Narrabeen NSW 2790 (DA2018/1481)
Preliminary Bushfire Assessment**

We refer to your recent correspondence to the Northern Beaches Council dated 25 March 2019 regarding the planned new Telstra facility at the above address.

1. INTRODUCTION

The proposed telecommunication facility, to be located on part of Lot 2611 / DP752038 at 1 Lakeshore Drive, Narrabeen NSW 2101, will comprise of the following:

- ✓ The installation of a new 35m high monopole structure.
- ✓ Installation of six (6) panel antennas on the proposed tower.
- ✓ A new Telstra equipment shelter of approximate dimensions 3.15m deep x 2.38m wide x 3.0m high to house electrical equipment associated with the facility, not more than 7.5m² in extent.
- ✓ The proposed compound will only be 6.0m x 6.0m in extent.

The three primary drivers for proposing a new telecommunications facility at 1 Lakeshore Drive, Narrabeen are as follow:

- Community Request
The RSL Lifecare Retirement Village in Narrabeen contacted Telstra to request a new facility within the grounds of the village to improve mobile communications. Telstra has been involved in negotiations with the RSL to find a suitable position on the premises. Several options have been considered.
- Capacity relief to existing Telstra sites

To provide much needed capacity relief for the existing Telstra sites around the Narrabeen area and carry new local cellular traffic in its vicinity. Surrounding sites have been expanded to their maximum capabilities.

- Reliable 4G Telstra services
Providing the depth of coverage required to enable reliable 4G Telstra cellular services for local residents, businesses and other mobile users.

Our office, on behalf of Telstra, submitted a new development application to the Northern Beaches Council during August 2018 in order to obtain the required approval to commence with the installation of the new infrastructure. The proposed installation will comprise of relative minor works as the compound area will not be more than 6.0m x 6.0m.

2. RFS GUIDELINES

The NSW Rural Fire Service provides some guidelines on planning on bush fire prone land. When lodging a general development application under the Environmental Planning and Assessment Act, 1979, such an application on bushfire prone land must be accompanied by a Bush Fire Assessment Report within the Statement of Environmental Effects demonstrating compliance with the aim and objectives of PBP and the specific objectives and performance criteria for the land use proposed. In particular, the following matters must be addressed:

- i. a statement that the site is bush fire prone land, where applicable,
- ii. the location, extent and vegetation formation of any bushland on or within 100 metres of the site,
- iii. the slope and aspect of the site and of any bush fire prone land within 100 metres of the site, which may determine the likely path of any bush fires,
- iv. any features on or adjoining the site that may mitigate the impact of a high intensity bush fire on the proposed development, and
- v. a statement assessing the likely environmental impact of any proposed bush fire protection measures.
- vi. whether any building is capable of complying with AS 3959/1999 in relation to the construction level for bush fire protection.

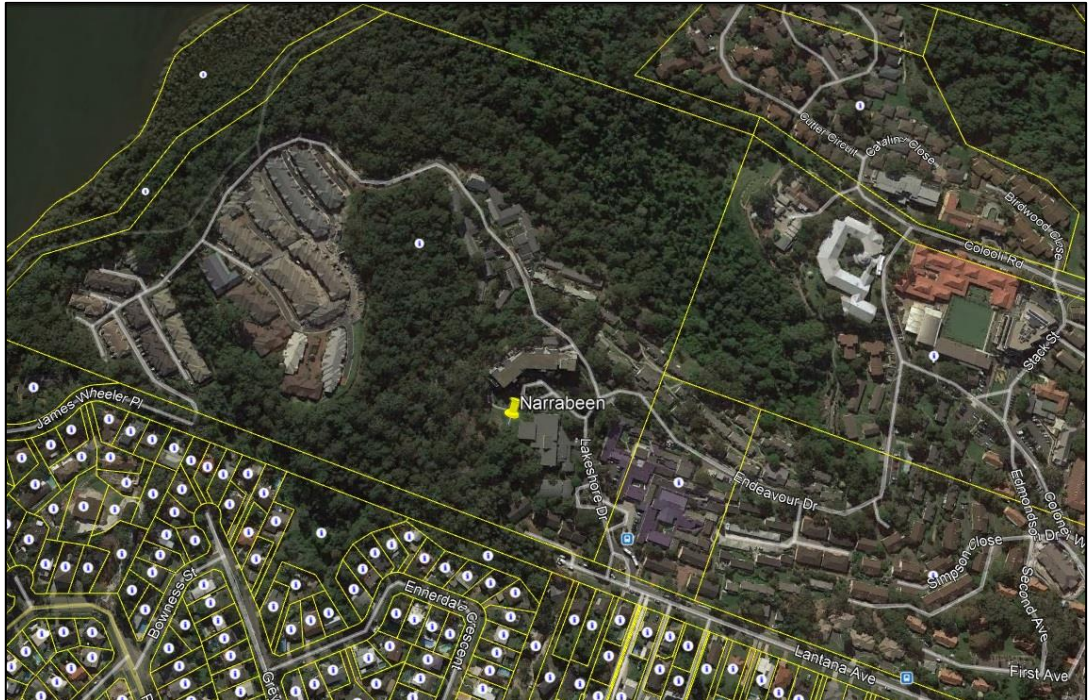
It is important to note that that the guidelines also state that, for most smaller applications like our current development application, this can be done relatively simply and can be accompanied by a diagram showing the required features with approximate distances.

As stated in the guidelines, bush fire prone land maps provide the trigger for the various development assessment provisions. The Commissioner of the RFS designates what constitutes a bush fire prone area (BPA) and how it is to be mapped. Each council then prepares a map in accordance with the guidelines.

According to the local planning guidelines and overlays, the proposed location of the facility is located on land identified as “Bushfire Prone Land – Vegetation Buffer Zone” for the purposes of Section 146 of the Environmental Planning and Assessment Act 1979.

3. SITE LOCATION

The site is located on cleared land directly adjacent the TLC Building at the Narrabeen RSL, located at 1 Lakeshore Drive, Narrabeen. See **Figure 1** below:



Latitude: -33.722994° Longitude: 151.281155°

The proposed location for the facility was strategically chosen for the following reasons:

- It meets the Telstra coverage requirements for the Narrabeen area.
- No vegetation removal or tree trimming will be required, as the facility will be located on land previously cleared of vegetation.
- The small 6.0 x 6.0m compound will have no negative impact on any vegetation or nature conservation areas as it is located outside of the E2 Environmental Conservation and Wildlife Corridor zone.
- Access, fibre and electricity is already available to the site.
- The site is located directly adjacent the RSL’s existing TLC Building.

Refer to the attached **Attachment 1 – Site Drawings** for more information on the site layout and design. The plans also indicate the distance between our compound and the nearest vegetation. We also attach hereto a copy of the **Survey Diagram** as **Attachment 2**. The diagram shows the proposed facility in

relation to the existing trees. We have also included the site photographs below to illustrate that the proposed facility will be situated away from existing vegetation.



Figure 2



Figure 3



Figure 4



Figure 5 – Photo Montage of Proposed Facility

The site slopes into a south western direction, away from the existing buildings to the east and north of the proposed compound.

4. BUSHFIRE PRONE LAND

As mentioned above and discussed in the SEE, the site is identified as “Bushfire Prone Land – Vegetation Buffer Zone” for the purposes of Section 146 of the Environmental Planning and Assessment Act 1979. The certification date for the bushfire overlay is dated 19-05-2016, with the supplied date being listed as 25-02-2019 (included below under Figure 6).

Bushfire Prone Land – Vegetation Buffer is a low bushfire risk. The category has got low combustibility and limited potential fire due to the cleared vegetation area, especially around the compound. Figure 6 below shows the current Bushfire overlay for the property and in relation to the proposed new 6.0m x 6.0m compound.

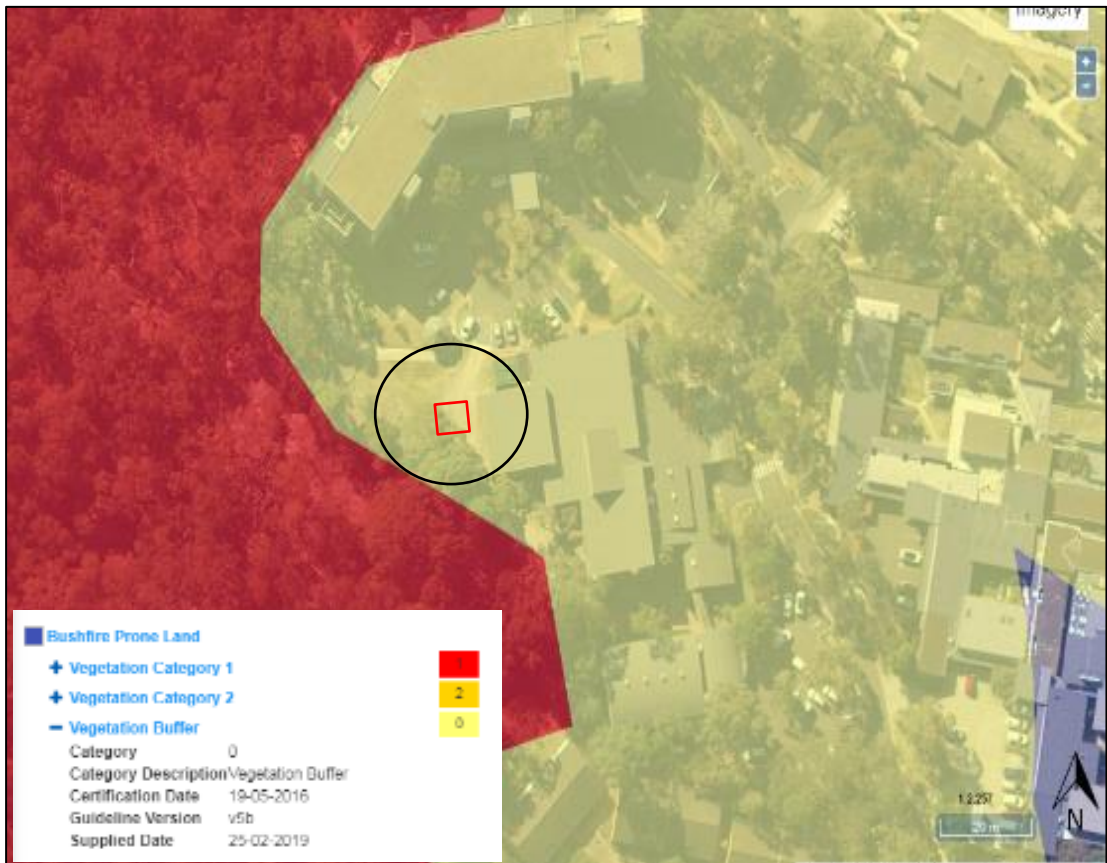


Figure 6 – Bushfire Overlay

In order to minimise the compound footprint, the proposal is to place the ground shelter (3.15m deep x 2.38m wide x 3.0m high and not more than 7.5m² in extent) on the base of the 35m high monopole structure. By doing this, the facility and equipment will be situated away from any vegetation and away from any land classified under Vegetation Category 1 and 2. As can clearly be seen above, the

proposed compound will not be located any closer to the Bushfire Category 1 land than the existing buildings nearby. The fibre and electric routes will be housed in underground conduits.

The proposed ground equipment will be housed in a standard Telstra ICS MK4.0 Equipment Shelter, which complies with the Building Code of Australia. The location of the shelter and the type of material used in ICS MK4.0 shelter is likely to withstand the radiant heat and any possible ember penetration into the structure associated with a bushfire in the Vegetation Category 1 zone to the south west of the facility.

We are of the opinion that, given the fact that this site falls under a low-risk bushfire category and is located directly adjacent existing building in a built-up area, no formal Bushfire Risk Assessment is required.

We hope that the above information would suffice.

Kind regards,



Mr Leonard Slabbert

Senior Town Planner NSW | Visionstream Pty Ltd

L 02 9413 0295.

E leonard.slabbert@visionstream.com.au

VISIONSTREAM AUSTRALIA PTY LTD

ABN 85 093 384 680

Sydney Chatswood Office:

Level 6, Tower 1, 495 Victoria Avenue, Chatswood NSW 2067

W www.visionstream.com.au