



Wednesday 26 June 2019

Cade Tracy
Central Coast Council

Objection to Development Application for Telstra Mobile Network Tower (DA56560/2019)

This is a real disappointment, both personally and for the community. I have had a successful development application approved for my partner and I to build a new home last month – and we are keen to begin a family. Our block appears to be the closest proximity to the proposed tower and we never knew of the DA application for construction of the tower. The process for alerting residents is flawed as I have only found out about the application yesterday - after speaking to a neighbour. While I do not yet have a mailbox, the Council have my email address.

The flawed notification process is also shown by the fact that there are so few objections, and of those only a few have been prepared properly to any level. In speaking to other locals, it appears that very few knew of this. This seems to me to be a denial of natural justice, and a breach of the Telecommunications Code of Practice which provides amongst other things:

- notify the owner and occupier of the land at least 10 business days before commencing the installation (or in our case, of the lodgment of the development application)
- make reasonable efforts to consult with, and resolve the objection from, any owner or occupier who makes a written objection
- respond to such an objector in writing
- refer the matter to the Telecommunications Industry Ombudsman (TIO) if the objector requests this in writing within five business days of receiving the carrier's written response
- comply with any direction from the TIO

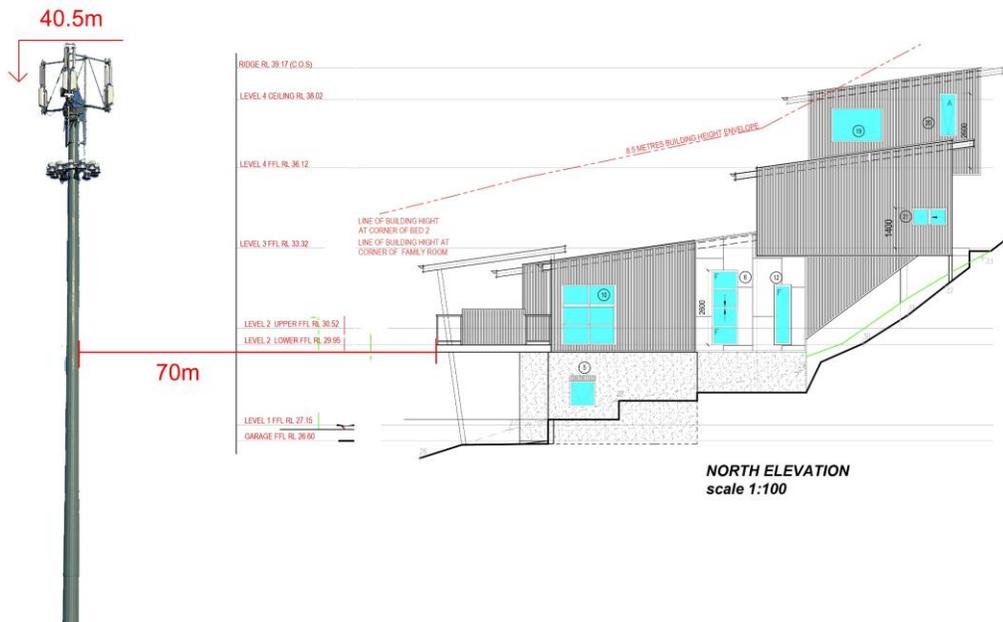
I list my personal objections, and as a member of the Tascott/Koolewong community where I have lived for all my life:

Personal Objections:

- Contrary to the document application by Telstra, who advise that the nearest residential dwelling is located 87m west of the facility – the corner of my home will be 69m direct line of sight to the transmitter(s).



- The height of the tower means that for each of the levels above my garage, I will be looking directly at the top of the tower. The following diagram places the Telstra tower superimposed on the view from my land. The tower will be from 9m to 40.5metres above sea level. The comparison of the tower and home levels are shown below:



- The following shows the impact of the tower on our views over Koolewong. I have superimposed a tower to the estimated height proposed.



- The construction of this tower will have a significant negative impact on the value of our land, and our home – when it is completed.
- A major concern is the potential health effects of the tower. There are numerous reports that discuss the potential harmful effects of RF EME exposure. I cite 2 for reference, and raise 3 objections specific to the potential effects of RF EME as proposed in the plan – Reference 1 is an article published by Arpana – the Australian Government’s primary authority on radiation protection and nuclear safety:

Reference 1: Radiofrequency Electromagnetic Energy and Health: Research Needs Technical Report 178 published June 2017

(<https://www.arpana.gov.au/research-and-expertise/technical-reports/radiofrequency-electromagnetic-energy-and-health-research>)

The executive summary identifies: “There is currently no established evidence that exposure to radiofrequency (RF) electromagnetic energy (EME) at levels below the safety limits of the Australian RF Standard causes any health effects. However, there are gaps in the knowledge that require further research.”

- RF EME Objection 1: The measurements in the report are taken at a height of 1.5m. We are unable to see the base (to 1.5m) of the tower. Nearly all the closest residents (like us) will be in direct line with the transmitter(s) or just below (ie 30-40 metres above sea level). What are the measurements at this height and our line of sight distance?

- RF EME Objection 2: The Purpose of the tower is to provide improved Telstra 4G coverage for commuters and other users. However, Telstra 5G will be available soon and the report provides no indication if this technology will be added to the tower and what effect this will have on RF EME emissions. Similarly, the planning assessment report talks about opportunities for co-location – does this mean other providers will potentially be allowed to add transmitters to the tower?

The second reference is by the Federal Communications Commission (FCC), an independent agency of the United States Government. The discussion highlights the need for ongoing monitoring:

<https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/rf-safety#Q6>

their possible relevance, if any, to human health. In the meantime, standards-setting organizations and government agencies continue to monitor the latest experimental findings to confirm their validity and determine whether changes in safety limits are needed to protect human health. ([Back to Index](#))

CAN PEOPLE BE EXPOSED TO LEVELS OF RADIOFREQUENCY RADIATION THAT COULD BE HARMFUL?

Studies have shown that environmental levels of RF energy routinely encountered by the general public are typically far below levels necessary to produce significant heating and increased body temperature. However, there may be situations, particularly in workplace environments near high-powered RF sources, where the recommended limits for safe exposure of human beings to RF energy could be exceeded. In such cases, restrictive measures or mitigation actions may be necessary to ensure the safe use of RF energy. ([Back to Index](#))

- RF EME Objection 3: The measurements of the Environmental report do not enable me to determine accurately my family’s and neighbors’ exposure to RF EME, given that I am in direct line of sight of the antennas at transmitter height. Will Telstra provide ongoing actual RF EME statistics? Can Telstra advise how I can measure RF EME amounts to allow me to monitor the health effects of my family – and, a process to follow if limits are exceeded?
The compliance of Telstra to the ARPANSA RF EME Standards is a major issue for me.

Objections – As Community Member

I note the objections of other people - who have listed numerous reasons for this development not proceeding and for which I am supportive. I will not replicate them. However, I want to reinforce the following:

- The foreshore and park is a popular place for walkers, cyclists and families – particularly on weekends. Looking towards the escarpment they will now see a construction rising just over 40metres above sea level. This is the height of a 10-story building! How does this get approved in a residential area? And in our topography? It will be highly visible from the roads on either side of the tower.
- The position of the subject site seems limiting to the Tascott/Koolewong valley, enclosed by the escarpment. The ‘bang for buck’ would suggest that the money would be better spent on those areas currently under no connection.

- When commuting to Sydney there has been no issue to working/connecting via mobile internet between Tascott and Woy Woy. It is post Woy Woy the problems begin. The application shows that there are already towers in the near vicinity, this tower would only cover the rail commuters for a short period of time (perhaps a few minutes), but in my own and other commuters journeys along this stretch, we have experienced no significant loss of coverage. As a resident of the area, we are adequately served by the existing cell tower in the area. Therefore, the benefit to the community and commuters would be tiny, but the adverse impact potentially massive.

