

8 October 2020

Our Ref: P-20029

Greg Samardzic

Lane Cove Council

48 Longueville Road,

LANE COVE NSW 2066

GSamardzic@lanecove.nsw.gov.au

Dear Greg,

RE: DA113/2020 - REQUEST FOR ELECTRO MAGNETIC RADIATION ASSESSMENT

This letter is in response to Council's request for an Electro Magnetic Radiation (ERM) Assessment to determine the impact of the existing telecommunications tower on future residents/employees.

As identified in the Statement of Environmental Effects, DA113/2020 does not seek consent for any works associated with the telecommunications tower. This will be undertaken thorough a separate process. Notwithstanding, I confirm the Proponent is in negotiations with the relevant telecommunications provider to relocate and/or remove the existing tower.

As you would be aware, telecommunications carriers are responsible for ensuring all towers meet the relevant Radiation Protection Standard.

Appendix D of the *NSW Telecommunications Facilities Guideline* (July 2020)ⁱ identifies a series of surveys undertaken in the Australian context over the past 20 years which confirm Radiofrequency Electromagnetic Energy (RF EME) levels arising from various mobile phone base station antennas were well below general public exposure limits.

Furthermore, health authorities around the world, including the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organization, have examined the scientific evidence regarding possible health effects from base stations. Current research indicates that there are no established health effects from the low exposure to the RF EME from mobile phone base stations.ⁱⁱ

Advice from ARPANSA was relied upon in a recent approval by the Hornsby Local Planning Panel (LPP) for a proposed telecommunication tower at Normanhurst Park (DA/999/2019). In the assessment report provided to the LPP, the following was acknowledged:

In 2002, Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) published the standard: *Radiation Protection Standard - Maximum Exposure Levels to Radiofrequency Fields - 3 kHz to 300 GHz*. The ARPANSA RF Standard sets limits for human exposure to Radiofrequency Electromagnetic Radiation (RF EMR) in the frequency range 3 kHz to 300 GHz. The Standard also includes requirements for protection of the general public and the management of risk in occupational exposure, together with additional information on measurement and assessment of compliance. This Standard was most recently reviewed in 2014 by an independent panel who found that the exposure limits in the RF Standard continue to provide a high degree of protection against known health effects of RF electromagnetic fields.

I also note the findings of Preston CJ in *Telstra Corporation Limited v Hornsby Shire Council [2006] NSW 133*. In this case Telstra successfully appealed Hornsby Council's refusal of two antennas on the roof of the Cheltenham Recreation Club. Preston concluded (at para 196) perceptions of an adverse effect on the health and safety of residents and on the environment by exposure to RF EME emitted from the proposed base station are without justification in objective, observable, likely consequences.

Yours sincerely,



Juliet Grant
Executive Director and General Manager

i <https://www.planning.nsw.gov.au/-/media/Files/DPE/Guidelines/nsw-telecommunications-facilities-guideline-including-broadband-2010-07.pdf>
ii <https://www.arpana.gov.au/understanding-radiation/radiation-sources/more-radiation-sources/mobile-phone-base-stations>