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**Sent:** 23/10/2018 2:02:05 PM

**Subject:** ATTN : Phil Lane - Regarding DA2018/1481 - 1 / 0 Veterans Parade NARRABEEN NSW 2101

Dear Phil Lane,

In putting together my submission document regarding DA2018/1481 - 1 / 0 Veterans Parade NARRABEEN NSW 2101, I have missed the submission date by 1 day. I hope you can accept my comments below as an objection to the construction of the Mobile Station. Or at very least treat them as comments and questions that I would still like answered.

Thank you

Gerry Ramdeen

My Home Address: 133 Veterans Parade, Narrabeen NSW 2101.

My submission Document would have read as follows:

I strongly oppose the construction of the mobile tower at 3 Lakeshore Drive NARRABEEN NSW 2101 on the following grounds:

1. As quoted in the Statement of Environmental Effects under The Purpose of the Proposal – “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.” I have walked around the Village with my kids using mobile phone games e.g. playing “Pokemon Go” without any drop outs, so there is definitely existing network coverage widely available around the Village. I’m sure there could be localised black out spots in buildings especially where the topology of the land dips and no line of sight can be provided by a nearby mobile tower. However, I disagree that construction of a 40m mobile tower is the best method to “improve mobile communications” within the village for these black out spots. This to me is the sledge hammer approach and not the best approach for the wider local community or the natural environment. Has the RSL Village been advised of other alternatives to resolve black out spots?. A quick search on Telstra’s website regarding “Network coverage extension devices” explains there are many “Network coverage extension devices that can help you connect to the Telstra Mobile Network from further away than normally possible, or in areas where signal may struggle to penetrate – such as indoors, or in hilly or dense terrain.” The latter sounds like the problem the RSL village is experiencing, and at no time do the Telstra website suggest a 40m Tower be constructed to improve mobile communications.

2. In section 5 – Mobile Telecommunications Networks. We are told there are 3 main reasons why users my experience Call Drop Outs, slow up of data or can’t even make calls. However, the Report does not provide details as to which of the three are the main cause of the problems experienced at the Retirement Village. I feel this is a fundamental short coming in the report as the reader is not informed whether the problem has been solved in an appropriate manner. Instead we are to assume that a 40m tower is the only solution to poor reception, and we are further given information in the last paragraph that can only read like a marketing exercise to promote Telstra’s network which is inappropriate and highly biased for a Statement of Environmental Effects Report.

In an attempt to understand the problem myself I installed a mobile phone app for monitoring mobile signal strength and drove around the RSL Village (as much of the village I could drive through including the Dardanelles which seems to be subject of a hard to reach reception area) on 21<sup>st</sup> Oct 2018. The mobile app reported no signal drop outs and on a traffic lighting system (green, amber red), never went in the red. The signal also always reported a 4g signal and never dropped to a lesser 3G signal (this is also bearing in mind the phone was inside a car). So my conclusion would be that there is coverage in the area and not a weak signal. The app also reported that I had connected to at least 3 different mobile stations in the local area. Something that is also misleading by omitting in the Visionstream Report. The

Report does not actually divulge or investigate the already good coverage for the majority of people in the wider community (already served by multiple stations around the Narrabeen Lake area) nor does it tell us if the Telstra system is at full capacity at any time with existing base stations and if the main load to any serving station is caused by large from the RSL Village. All these are contributing factors to whether a tower is warranted or not.

3. In Section 7– Justification for Site Selection, the report shows a map in figure 1 of existing and proposed telecommunications facilities surrounding the RSL Lifecare Retirement Village. The map shows the proposed tower with no other stations in the area. We are told, “The RFNSA denotes no other facilities existing within 600m of the proposed site. As such, there were no suitable collocation opportunities to provide the required radio frequency coverage objectives.” The reader is not informed of what the objectives mentioned are, but surely it is to provide mobile coverage in the area. At no time are we shown all the existing towers that currently provide coverage to this area nor are we told about other proposed mobile stations that might improve coverage in the future, like the proposed tower at “CNR OF TORONTO AVE AND BADCOE RD, CROMER NSW 2099” also sourced from the RFNSA, [www.rfnsa.com.au](http://www.rfnsa.com.au). Are we to believe that if a mobile base station is not within 600m of another then one should be built to provide coverage? The land will soon be covered in towers. This can not be justification for erecting a mobile tower.

Surely all towers with line of sight and the capability to serve the area should be considered? And if there are hard to reach areas because of topology, trees or buildings then other alternatives should be considered first, like a repeater, or low to high gain aerials (which look and work more like tv aerials to receive existing signals).

4. The overall report and proposed construction of the 40m mobile tower is only proposing Telstra communication coverage. Do we know if all the residents of the village are with Telstra? Otherwise, the proposal alone will not solve the main Purpose of the Proposal. Will other providers find different optimum sites for their network coverage to construct their own mobile towers or is this Proposal serving as a backdoor to which other carrier providers will then attach to the tower? (The tower located at Collaroy Plateau Park is really quite an eye sore with so many attachments not to mention the ever increasing Electromagnetic Radiation (EMR) as companies find newer higher and lower bandwidth to broadcast on.)

5. As stated in section 6 Site Selection Process, “Proximity to community sensitive locations and areas of environmental heritage.” I believe the site selected is very close to a community sensitive location. By nature of the proposal, it is adjacent to an Age Care facility & Pre-School on site. I have concerns around:

a. We are told to switch off phones in Hospitals and doctor surgeries because of the interference they can cause to equipment. How will a 40m mobile base station interact with all the medical equipment at an Age Care facility?

b. If incidents occur or prolonged issues arise which are linked to the increase in local EMR will the council be liable and use tax payer’s money for such claims.

c. There is a child care centre located on the site and two (at least) primary schools in the local area which are community sensitive regarding the installation of a mobile base station. On the ARPANSA government website: <https://www.arpansa.gov.au/understanding-radiation/radiation-sources/more-radiation-sources/mobile-phones>

The recommendation in the section titled “Can my child use a mobile phone?” is – “It is recommended that, due to the lack of sufficient data relating to children and their long term use of mobile phones, parents encourage their children to limit their exposure by reducing call time, by making calls where reception is good, by using hands-free devices or speaker options, or by texting.”. By constructing a mobile base station in this area it will place kids in areas of constant higher Electromagnetic Radiation, which goes against limiting children’s exposure to such radiation.

d. The tower is adjacent to Narrabeen Lake with its bushland buffer. Structures in the local area are generally low rise which contributes to keeping the natural bushland look and feel. From many vantage points it is possible to see the tree tops to the horizon. By nature of its design the 40m mobile tower will be the tallest structure around and will be the main focal point when looking out. It will degrade the natural looks and environmental heritage of the local area. The view from north of the Narrabeen Lake looking back south across the lake to the RSL Village nestled in the Plateaus foot hill will be absolutely interrupted by a 40m Mobile Tower at its optimum look out location, pointing straight back at you.

6. When reading various government websites on Mobile Electromagnetic Radiation there seems to be a lack of 100% certainty around people's health. In particular, on the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) website their page on Mobile Phones and Health states as their opening paragraph:

"There is no established scientific evidence that the use of mobile phones causes any health effects. However, some studies have shown a weak association between heavy mobile phone use and brain cancer."

This is a major concern to me when a mobile tower will be built in the local area, in addition to my general mobile use.

The language used and the studies quoted on government websites are reminiscent of the tobacco industry's reaction 40 years ago to suggestions that smoking cigarettes may cause cancer. We even know now that secondary smoking should also have been considered in these studies. I fear the EMF from these towers are like local communities sucking in the secondary smoke from these towers every hour of every day. So it is a major concern, that even though the public are told that "currently" there are no scientific evidence, the underlying language does entertain that there might be in the future. I do not want me, my family or the local community to be lab rats to the telcos and government to end up as a statistic either one way or the other in 10-20 years time.

Northern Beaches Council must reject this application for the benefit of the wider community and environment, and RSL Lifecare should seek a more appropriate small scale solution to the lack of mobile reception experienced by a small number of its residents.