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RE: DA2018/1481 - 1 / 0 Veterans Parade NARRABEEN NSW 2101

I live close proximity to 1 Lakeshore Drive, Narrabeen and strongly object to the proposed construction of the 40 metre monopole tower proposed in this Development Application ("DA") given:

"The negative impact upon the visual amenity and consequent diminishing values of real estate in the community; and
"Concerns with respect to Electromagnetic Energy (EME) and possible negative health effects.

Council is urged to address these concerns particularly given the extremely close location of the proposed tower to residential premises including aged care facilities, two schools and a child care centre.

Whilst the merits of the purpose of the development are noted and accepted in that mobile phone reception is clearly a necessity for the community it is submitted that further options should be considered which achieve improved mobile service whilst minimising the impact upon the community. In this regard, it is submitted that further consideration should be given to both the location and size of the proposed monopole or other options for mobile service.

The DA states that "there are three primary drivers" for the proposal:

1. Community Request - ie the request of RSL Lifecare;
2. Capacity relief to existing Telstra sites; and
3. Providing reliable services for local residents, businesses and other mobile users.

With respect to the first reason for the proposal it is assumed from the submissions that have been lodged to date that this relates primarily to complaints from the residents of "the Dardanelles" within the War Vets. The reason for which mobile phone reception was not a consideration of the original application for the Dardanelles site is unclear. In any event, the proposed site of the monopole will impact upon the whole of the Narrabeen/ Wheeler Heights area and is closer to Lantana Avenue than it is to the Dardanelles site. If the purpose of the proposal is to provide mobile phone coverage to the Dardanelles consideration should be given to a smaller tower closer to it or other service options.

The Statement of Environmental Effects lodged with the DA ("the DA Statement") states that the two alternative sites were rejected after consultation with members and residents at the RSL and the selected site chosen as it achieves the required coverage requirements "whilst having a minimal visual impact to the area". Candidate A was seemingly rejected due to RF/technical reasons. However, Candidate B is noted to have been appropriate given "its central location within the retirement village, providing good separation from surrounding

dwelling and roads outside of the complex" but was rejected after consultation with RSL residents. The reason for this is not noted. Candidate C is noted to have been chosen "as it also achieves reasonable separation from surrounding sensitive land uses and was considered more appropriate for the retirement village by the residents of the complex". Reasons including screening of the tower from dwellings in the complex are noted. However, no consideration appears to have been given to "screening" of the tower from dwellings throughout the community outside of the RSL Village. It is evident that a 40 metre tower will be clearly visible from Lantana Avenue and other locations in the area.

The adverse visual impact to the community of a 40 metre high tower in what is otherwise a leafy bushy outlook cannot be ignored.

As noted in the DA Statement the facility proposed is not a "low impact" facility under the Telecommunications (Low-impact Facilities) Determination 1997. Whilst the proposal is not subject to the Communications Alliance Ltd. C564:2011 Industry Code - Mobile Phone Base Station Deployment ("the Code") the Code provides assistance to Council and the "precautionary approach" outlined in the Code should be adhered to given that the tower is proposed to be located within sensitive land uses. Further the Code promotes the use of existing facilities to mitigate the effect on the landscape, thus, it is not clear why the alternative sites have not been adopted.

Compliance with the NSW Telecommunications Facilities Guideline including Broadband (2010) is required pursuant to the SEPP (Infrastructure) 2007 as amended by the SEPP (Infrastructure) Amendment (Telecommunications Facilities) 2010 ("the Guideline). Principle 1 provides that a Telecommunications Facility should be sited to minimize visual impact. Further subsections are relevantly as follows:

- (e) provides "A telecommunications facility should be located and designed to respond appropriately to its rural landscape setting." - In response to this principle the DA states "The facility has been located and designed to respond to its surrounding urban and rural landscape context. This is discussed in detail in Section 8."

(g) provides "A telecommunications facility should be located so as to minimise or avoid the obstruction of a significant view of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land. - In response to this principle the DA states "The proposed facility is located on private property against the back drop of forestry vegetation. Minimising disruption to views of this landscape has been reduced through the design characteristics of a monopole. Refer Sections 7 and 8."

However, neither section 7 or 8 of the DA Statement adequately address the manner in which the facility is located and designed to respond to its setting or to avoid the obstruction of the streetscape, vista or panorama. Section 8 merely states "Internal discussions at the RSL have taken place and residents are aware of the proposed installation and its location" and as noted above section 7 dismisses the alternate candidate sites for similar reasons and otherwise addresses only the visual impact of the monopole from the War Vets itself rather than from other locations including the surrounding streets and the vista or panorama of the surrounding locations. It is submitted that the tower in no way responds "appropriately" to the landscape setting and fails to minimise the obstruction of the vista or panorama as required by the Guideline.

Whilst visual considerations are addressed in section 11 of the DA Statement the considerations applied are primarily those of residents of the War Vets itself. The illustration of the monopole included on page 24 would appear to be of far lesser height than that proposed at 40 metres and the suggestion that the facility "will blend in with the existing vegetation backdrop" simply because its finishes will be non-reflective should be rejected. Clearly the proposed 40 metre height of the facility will tower over all trees and buildings in the area and will be visible from extensive distances. The statement on page 27 of the DA Statement that

the facility will not impact upon the valued landscape qualities in the region should be rejected. Further, it is stated in the DA that the facility is proposed to be located in the "middle" of the War Vets site providing "good separation from surrounding areas", however, it is evident from quick review of the map included in the DA that the monopole is not in the middle of the War Vets site and is in close proximity to Lantana Ave. It appears that a shorter tower, perhaps on the downwards sloping land towards the Dardanelles site, or an alternative location or possibly wireless alternatives would better achieve the objectives.

Council is also required to address consistency with the zoning of the subject site- zone SP1 - Special activities: Senior Housing & Health under the Warringah Local Environmental Plan 2011 in addressing whether consent should be granted to the proposed DA. An objective of this zone includes "to facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land." In addressing this consideration section 11.2 of the DA states only that the infrastructure is required to serve the local community with better phone coverage and addresses the effect on the immediate land on which it is to be constructed. The DA does not address or acknowledge in any way the adverse impact upon properties surrounding the whole of the War Vets site and the visual impact upon the wider community. Council has an obligation to its residents to ensure the retention of surrounding amenity and property values and should reject the DA.

The second and third objectives of the DA - namely to provide capacity relief to existing Telstra sites and to provide reliable services for local residents, businesses and other mobile users do not require the proposed development of the subject land. An alternative site/s could be identified to achieve these purposes. Further, despite it being an objective to provide extended services to residents outside of the RSL War Vets it does not appear that the wider community has been consulted.

Public safety concerns also need to be acknowledged and addressed in considering this DA. In this regard the level and effect of exposure to EME emitted from telecommunications towers remains subject to debate and the long term impacts (including cancer etc) remain unproven. These risks will be greater should the facility be shared with other carriers as indicated. The potential negative health effects to the residents of the Narrabeen / Wheeler Heights area should not be risked and consideration should be given to relocating the facility at a distance further from the community including schools or in a manner to minimise the EME.