

Re: Proposed Optus Tower Installation

7356 / 1167221 Huston Parade NORTH CURL CURL NSW 2099

Application Number: DA2020/0661

Curl Curl Lagoon Friends Inc. strongly resists this latest development application from Optus to erect a mobile phone tower in an ecosystem under rehabilitation. As a community environmental organisation that has worked for over 40 years to restore and preserve the lagoon and its surrounds, we are appalled at the continued attempts to further this corporation's commercial expansion at the expense of public open space.

This is not just any park. This is a sensitive wetland area still under restoration from a previous short-term economic decision to use the area as landfill. Generations of local residents - and ratepayers - have volunteered countless hours to plant reeds, remove litter, restore bushland, study the aquaculture, count birdlife, install fish habitat and keep watch for fauna under threat.

Optus, and its consultants Urbis, have vastly discounted just how much this community values the parkland and lagoon ecosystem. Repeated attempts to simply deny the visual, social and environmental impact of unwanted development on the banks of the lagoon are disrespectful and bullish.

We have witnessed the effect that incremental development has on the area and have well-founded fears that granting one telco application will inevitably provide precedent for further incursions.

We do not support this application for the following reasons:

1. **Inconsistent with previous community agreement:** Optus removed a tower from McKillop Park in Freshwater due to overwhelming community resistance. Following this, a commitment was made to the Freshwater community that no towers were to be erected in public parks and reserves. We strongly reject the proposed location and recommend that parks and reserves be removed from areas considered for mobile tower installation.
2. **Lack of community support:** In 2015 during the community consultation for the previously proposed location for a communications monopole (north side of the lagoon in John Fisher Park), 122 of 166 responses stated objection to any facility. In 2017 DA2017/0298 received 139 submissions: 133 against and 6 in support along with a petition with 839 signatures opposing the development. Simply counting this as community consultation for this latest DA discounts the consistent and sustained opposition. In 2020 we must move beyond paternalism and listen to the most impacted stakeholders: the people who actually live here.
3. **No demonstrated need:** Optus has not released figures on how many customers would experience service improvements. There is no survey data released to diagnose actual need. This proposal is more about gaining market share than serving a community. It is fatuous to say the tower would improve economic prospects of residents or be critical in case of emergency. The Australian Communications and Media Authority is clear on the subject: "You can call 000 even if your mobile provider does not have network coverage in the area. Your call to 000 will

be carried on any available mobile network.” Telstra has coverage in the area and any emergency calls would be carried.

Again, we believe the purported benefits are not proportionate with the environmental and social cost.

4. **Adverse visual effect:** “9.3.2.7. Building Bulk (Clause D9) The objectives of this clause are as follows:

- To encourage good design and innovative architecture to improve the urban environment.

As a telecommunications facility, there are limitations in what is possible in terms of design to improve visual appearance.”

This has got to be the understatement of the entire report.

Returning to a previously rejected location and design because Optus cannot make any other location work does not make this an optimal design nor location. It’s simply one of the least worst options.

This area is frequented by children and adults during sporting matches, at the nearby community garden, the native nursery, planned skate park and while enjoying passive recreation – not to mention nearby residents. The park is in use from dawn to dusk every day of the week with sports training, joggers, family recreation while weekend use of the park is intensive, with thousands of people coming together for sport, bush regeneration, dog walking and enjoyment of open space.

The park became even more valuable to locals during COVID-19 restrictions when open space was at a premium. The ability to be outdoors in a place of natural beauty became a physical and mental health reprieve.

A mobile phone tower would stand out in a large area of parkland presently devoid of any similar such infrastructure - visible even from the beach according to the reports provided. There are no ‘adjacent trees’ to shield it – contrary to the misleading statement on p.63 of the Statement of Environmental Effects report. Its proposed positioning is clearly inappropriate in the overall context of the rehabilitated parklands.

5. **Contrary to Plan of Management:** Urbis’s interpretation of the John Fisher Park Plan of Management is simplistic and contrary. To simply state that the proposed development is in line with the vision “ to be a healthy, accessible open space that provides harmoniously for both active and passive recreation, which is well maintained and protected by responsible use and management” is disingenuous. Core objectives state “To facilitate community education in relation to wetlands, and the community use of wetlands, without compromising the ecological value of wetlands.” To argue that placing a 25.7 metre tower and accompanying raised box infrastructure directly on the bank of the lagoon in the riparian zone does not compromise the ecological value of the wetlands is simply wrong.

The riparian zone of the creek and lagoon is intended to be left untouched in order to restore the health of the waterway. It’s a no-go zone for development and this application explicitly contravenes that principle.

The community has repeated many times that they value the open space and wetlands and do

not want development incursions.

6. Undesirable precedent: There is currently no similar development in John Fisher Park due to stakeholder agreement to the Plan of Management and active ongoing community input. While the argument for co-locating a tower near a baseball net is weak, other telecommunications operators will view any installation of a tower in John Fisher Park as a virtual invitation to replicate or enlarge the proposed tower.

Curl Curl Lagoon Friends Inc has received many representations from its 200+ household membership base, expressing concern and dismay that Optus is yet again seeking to erect a mobile phone tower and associated infrastructure in the park.

We urge Northern Beaches Council to reject this application and move to prevent any such applications in John Fisher Park in the future.

Paula Cowan, President
Pam Rawling, Secretary
Curl Curl Lagoon Friends Executive Committee