Sent: 24/07/2020 5:44:50 PM
Subject: Submission for Application Number DA2020/0661
Attachments: HZ - Northern Beaches Council - Objection of DA2020-0661 - 24-7-2020.pdf;

Dear Northern Beaches Council,

Please see attached my submission for the above DA to be forwarded to the relevant department.
(Not submitted via online link due to the file being a PDF)

Thank you and kind regards,
Heidi Zhou

Heidi Zhou

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NORTH CURL CURL NSW 2099

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24 July 2020

Mr. Ray Brownlee & Mr. Michael Regan

CEO and Mayor

Northern Beaches Council

Dear Mr. Brownlee, Mr. Regan and elected councillors of Northern Beaches Council,

Re: DA2020/0661 (Lot 7356 DP 1167221) Huston Parade, North Curl Curl – Construction of a Telecommunications Facility with associated equipment

I write to you to consider the community's strong objection of the above proposal.

As you are aware, the application for the proposed telecommunications facility had previously been rejected in 2015 and 2017 (DA2017/0298). Reasons for rejection include unacceptable impacts on the closely surrounding natural and built environment with significant negative social and visual impacts.

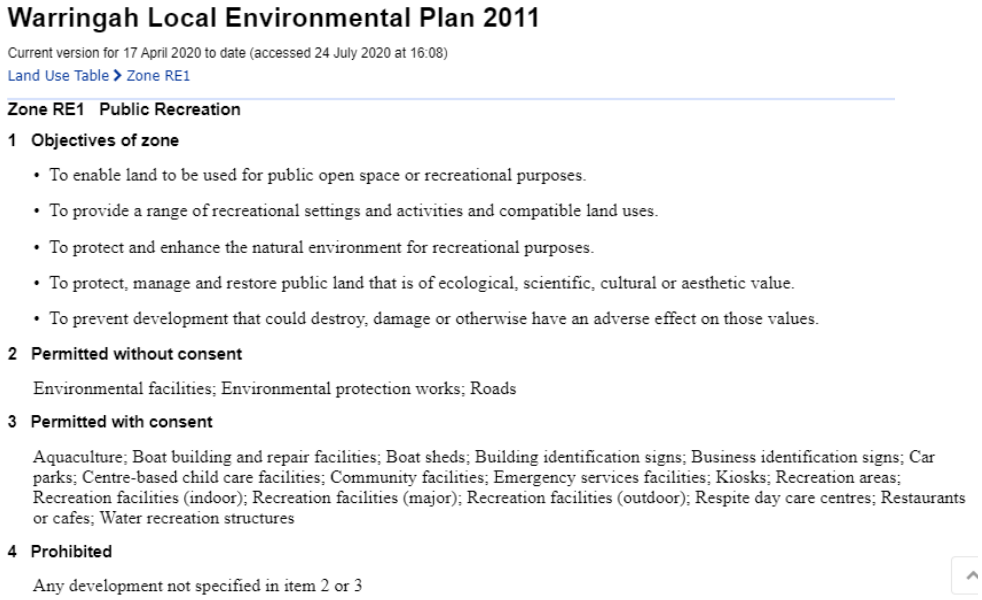
The exact same concerns addressed in the opposition of the last application still remains today. Please consider the following points which I largely refer to the Statement of Environmental Effects (referred throughout as the 'SEE') and Preliminary Site Investigation report (referred throughout as the 'PSI').

I strongly object to this proposal due to the following:

Suitability of the site

- **Inaccuracy of site location:** The address of the application on 'Huston Parade' is inaccurate and misleading. The actual telecommunication facility is proposed to be located on the Abbott Road Sportsground/John Fisher Park, 500m away from Huston Parade. Due to this inaccuracy, residents within 500m from John Fisher Park were not notified by Council as it was calculated from 'Huston Parade', avoiding the 500m notification requirement. This alone has angered many members of the community who only accidentally stumbled across the development application.
- **The subject site is a former landfill:** John Fisher Park being a previous landfill required EPA investigation of contamination. Whilst the land is now remediated, it is in an Acid Sulfate prone area with potential Acid Sulfate Soils at site (PSI Page 5). Excavated materials will require careful management and disturbance of this remediate land is not suitable. Additionally, there is the chance of revealing asbestos or asbestos fragments in the soils (PSI Page 24) during earth works.

- **Located in land use zone RE1:** to be used for public open space and recreational purposes only and to protect public land that is of ecological, scientific, cultural or aesthetic value. As below –



Warringah Local Environmental Plan 2011

Current version for 17 April 2020 to date (accessed 24 July 2020 at 16:08)

Land Use Table > Zone RE1

Zone RE1 Public Recreation

1 Objectives of zone

- To enable land to be used for public open space or recreational purposes.
- To provide a range of recreational settings and activities and compatible land uses.
- To protect and enhance the natural environment for recreational purposes.
- To protect, manage and restore public land that is of ecological, scientific, cultural or aesthetic value.
- To prevent development that could destroy, damage or otherwise have an adverse effect on those values.

2 Permitted without consent

Environmental facilities; Environmental protection works; Roads

3 Permitted with consent

Aquaculture; Boat building and repair facilities; Boat sheds; Building identification signs; Business identification signs; Car parks; Centre-based child care facilities; Community facilities; Emergency services facilities; Kiosks; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Respite day care centres; Restaurants or cafes; Water recreation structures

4 Prohibited

Any development not specified in item 2 or 3

- **Located in community sensitive locations and areas of environmental heritage:** As well as within a coastal use area, the proposed location is only 350m to Curl Curl North Public School, 100m away from closest residences, Curl Curl beach, sporting club grounds, public recreation grounds, skate park, community garden and Curl Curl lagoon; a sensitive wetland area. Accordingly, I strongly disagree with the conclusion of Urbis stating that the location is *"not near community sensitive locations"* (SEE page 63).
- **Site candidate location suggested by Council** at a pre-development meeting, according to page 9 & 25 of the SEE. This site was not suggested by members of the community. This contravenes Urbis and Optus' stance that a large amount of community consultation had been conducted for the decision of current proposal location.
- **The proposal completely conflicts the vision of John Fisher Park**: According to the 2011 John Fisher Park Plan of Management *"John Fisher Park and Abbott Road Land should 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".*
- **Visual amenity impacts** for residents and visitors to the park. A structure with the total height of 25.7m with possible further extensions negatively impacts the beautiful coastline and greenery. Furthermore, according to Council's Environmental Health referral, should the proposal be approved, it will require installation of flood lighting which has the potential to impact nearby residential premises.

Community concerns and social impacts

- **The 98 page Statement of Environmental Effects** and all of the supporting documents provided by the applicant do not demonstrate evidence of direct community need. There was no clear evidence provided for what Optus deems a *"necessary"* application.

- **Community consultation was held once five years ago:** The once only community consultation referenced throughout the application was held on 26 November 2015, which received 166 responses. Of these, 122 stated an objection to any telecommunications facility. Subsequently, the DA2017/0298 received 139 submissions; 133 against and 839 signatures opposing the development. To quote the current application, Optus deemed it *"most appropriate"* at this stage that they did *"not require any additional consultation",* despite the opposing feedback from the last consult. Optus made no efforts to seek further community consultation after supposedly addressing concerns over the past 5 years.

Environmental and Public Health Impacts

- The proposal would require removal of recently planted native tubestock,
- Vehicle access for construction and maintenance of facility would traverse playing fields use by many sporting clubs,
- SEE provides conclusion that Electronic Magnetic Energy (EME) radiofrequency levels do not have any adverse health effects, however does not specify if this is inclusive of young children and adolescents. This applies to the children of Curl Curl North public school as well as the demographic that largely utilises John Fisher Park.
- Again, suitability of using a previous landfill now capped and used as playing fields. This land should not be disturbed as construction work will uncover previous landfill (Council's Environmental Health referral) with potential for Acid Sulfate Soils and potential to reveal asbestos fragment material.

The proposal seeks to *"assist in providing enhanced telecommunications services to the Curl Curl area"* however as you can see from the many objections already received, there is no demonstrated need by the community. This is also evident by the community's strong objection and subsequent decommissioning of the telecommunications facility erected at McKillop Park. Additionally, according to the SEE, the coverage that will be provided by this development will only result in 'good' coverage around the area of the telecommunications facility.

To our CEO, Mayor and Councillors - the community is already on high alert with the current global pandemic. Health ramifications to humans (especially children) and sensitive wildlife is of high concern. Communities of all ages have sought to open and green spaces during this difficult and sensitive time as a way of relief for both recreational and exercise purposes for mental and physical wellbeing. Parks and reserves are no place for telecommunication towers.

I urge you as elected representatives of the community, and to Northern Beaches Council, to reject this application and to prevent from such applications in John Fisher Park in the future.

Thank you for your consideration.

Yours sincerely,

Heidi Zhou