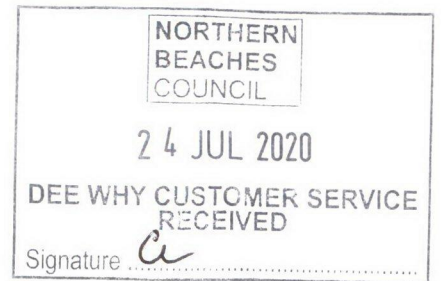


9/43 Adams Street, Curl Curl NSW 2096

Chris Thomas

24 July 2020

Dear Sirs



Re: Proposed Optus Tower Installation DA2020/0661 - 7356/1167221 Huston Parade NORTH CURL CURL NSW 2099

I wish to strongly object to the proposed installation of a 25.7m high Optus monopole and associated antennas, remote radio units, outdoor cabinets and elevated platform on a site immediately adjacent to Curl Curl Lagoon at Abbott Road Field No. 5, John Fisher Park.

I do not support the application for the following reasons:

1.0 Lack of Community Support:

Over the past 5 years Optus has continued to ignore community opposition to the installation of such a tower anywhere in John Fisher Park. The current site was one of two sites put forward as part of community consultation in 2015. Of the 166 submissions received out of this consultation, 122 stated opposition to this type of facility anywhere.

In 2017 Optus came back with a DA for the installation of a 28m high tower on a sportsfield site on the south side of Curl Curl Lagoon. Council received 139 submissions, with 133 of those objecting to the proposal, along with a petition of 839 signatures opposing the DA.

Despite the above clear level of community objection to these two attempts for this type of facility on the park we now have Optus returning to the 2015 site to try again.

2.0 Inconsistent with Previous Community Agreement:

In March 2017 Optus was forced to remove a phone tower from McKillop Park in Freshwater due to overwhelming opposition. Following this, commitment was made to the local community that no towers were to be erected in public parks and reserves.

The current proposal totally ignores this commitment to the community and continues to aim to place a facility in the middle of a park. Once one such facility is allowed onto this open space other telcos will quite happily submit their proposals to follow on.

3.0 No actual need?:

Optus has never provided any details of customers requiring service improvements. In its own promotional material Optus shows the coverage throughout the 2096 postcode to be 'Great', and for 2099 'Great' or 'Good'. This proposal is more about trying to gain market share rather than a need for service improvement.

4.0 Visual Impact:

The proposed installation of the monopole and telecommunications equipment will be visually totally unacceptable.

The Visual Impact Assessment (VIA) itself draws attention (see '4.1 Overview') to the 'Higher visual sensitivity' of recreational land uses, and in this respect whilst North Curl Curl is a suburb within an urban area, it is paramount to recognize that the precise setting for this proposal is in a park.

'4.2 Visual Fit' also notes that 'Visual impacts will result from the exposure of sensitive viewers to proposed elements which contrast strongly, or which are incompatible with the landscape character of the setting.'

The location site is within an area of wide green open space, allowing distant views between residential properties either side of Curl Curl Lagoon. The installation of a new larger and taller monopole with the addition of a grouping of antennas on top will result in a structure totally out of keeping with the surroundings, and causing a substantial visual impact.

In describing the Vegetation and Landscape Form the VIA states:

'The vegetation lining the edge of the lagoon is comprised of coastal riparian communities, with the typically 10 to 15 m high trees creating a dense screen.

The proposal is located adjacent to sporting fields with a narrow strip of vegetation along the edge of the lagoon (refer to Figure 5).'

This statement and the reference to the photo Figure 5 is totally misleading! The view taken in this photo is further west of the proposed tower location, where there is some dense vegetation and trees. The vegetation along the edge of the lagoon by the actual site location is of much lower planting. The true aspect of this can be clearly seen from the photo at Figure 4, which is a view from the south side of the lagoon looking across to the proposed site. The low level of vegetation is such that even the northern grass field is plainly visible.

4.5 Assessment Of Sensitive Viewpoints:

The VIA claims under this section that 'Representative viewpoints, particularly within residential areas, have been selected due to their higher levels of visual exposure to the proposal'.

Actually some of the viewpoints seem to have been deliberately chosen simply where the view is impeded either by vegetation or structures (VPs 6, 7, 8, 9, and 10)!

Viewpoints have all been chosen at ground level, and nowhere show the visual impact to residents of properties overlooking the site from the north and south hillsides either side of the lagoon. Chosen views 'are typically from roads within residential areas that are aligned directly towards the proposal', as though motorists are the only people likely to be affected by views! The assessment of these viewpoints has totally ignored pedestrians and the fact that not only are they are not restricted to just viewing from a road, but also they can move their head to appreciate a wider appreciation of visual impact!

Individual viewpoint comments:

VP1

This photo shows a clear unobstructed view to the new structure from the south side of the lagoon. The VIA argues 'Its distance from the road results in views to it being from the oblique to the perpendicular, and therefore not immediately in the forward line of sight of motorists crossing the bridge over the lagoon' and 'the visual impact for this viewpoint is considered to be moderate.' This statement totally ignores the fact that the majority of viewers are likely to be pedestrians either on the bridge or walking the pathway on the southern side of the lagoon. Their views to the antennae and pole will be direct and unobstructed' and as such the visual impact will be high.

VP10

VIA states 'only varying amounts of the upper parts of the monopole and the antennae would be visible'. The photo clearly shows a substantial amount of the pole visible and the addition of the antennae will only further add to its visibility from this location.

VP6

This photo is taken at the junction of Pitt Road and Griffin Road, with a view of the new pole possibly screened by intervening built form and vegetation. However you only have to move further north up Griffin Road and the existing lighting poles are already visible without the additional height of the antennae.

Residential Viewpoints VP2, VP5, VP7, VP8, and VP9:

VP2

The views of the proposal are not 'relatively unimpeded' they are open views across the sportsfield, as is clear from the photo. What the photo fails to include is another light pole to show the comparative difference in height and girth despite admitting that 'the greater diameter of the proposal's pole results in it being more visually apparent'.

The assessment also comments: 'The equipment shelter is a relatively small element within the context of the setting, comparable in scale and form with other sports related structures, such as player shelters and coaching boxes.' The equipment shelter may be considered a small element, but it is a solid element on a raised platform, whereas the sports related elements in the photo are all open mesh and provide limited disruption to the landscape beyond.

It is important to note that the tree visible adjacent to the baseball net and called up on the DA plans as an existing feature to be kept, actually no longer exists!

VP5

Despite the assessment claiming that the difference in pole size and height will not be distinguishable from the existing lighting poles, the antennas mass at the top of the pole will certainly be an obvious visual difference, and particularly when viewed from the residences of Molong Road.

VP7 and VP8

These two views have been taken at roadside spots where 'intervening built form and taller vegetation' mostly screen the views. These are biased selective viewpoints. Taking VP7; there are other viewpoints along Headland Road where the tower would be clearly visible from the roadside - Parr Avenue, and Playfair Road for example, and again the assessment has not taken into account elevated views from the properties of the north side of Headland Road. The same goes for VP8. One only has to walk along Curl Curl Parade to see the open viewpoints to the tower site, and properties on either side of the road will have uninterrupted views across the lagoon to the proposal.

VP3 and VP4

Two more selective viewpoints! The vegetation surrounding the beach car park does in fact screen long distance views to the site, but you only have to start walking along the pedestrian pathway just to the right of the photo limit and you have clear views to virtually the full height of the existing light poles. For VP4 there are plenty of points along the North Curl Curl SLC car park where the poles are visible, and particularly on a sunny day rather than the overcast one used for all these photos.

In summarising the Visual Impacts of the development; the SEE states: 'Given the advantages to be derived by the public at large (by increasing telecommunications coverage and capacity) Optus believes that the visual impact is acceptable and outweighs any general loss of visual amenity'.

The 'public at large' do not find the visual impact acceptable, they do not require increased telecommunications coverage, and certainly do not want the installation of this facility!

5.0 EMR exposure concerns:

A major concern to the community is the matter of risk to health with exposure to EMR from mobile phone towers. There seems to be no definitive proof for either side of the argument as to the level of danger from this source of radiation output, however it is notable that many eminent scientists and doctors worldwide have called for stricter standards, and a growing number of countries are taking a more responsive action towards this.

The proposed site is a short distance from North Curl Curl Primary School. The school children use these sportsfields for recreation. Outside of school hours children continue to make use of the parkland facilities. Mothers walk their babies and toddlers through this space every day.

In view of the high level of concern in respect to the possible effects of such forms of radiation surely it is better to take the precautionary route and avoid placing these devices in highly populated areas, and particularly in nearby proximity to schools and places where children will be gathering for the playing of games involvement in recreational sport.

It is important to note that the NSW Department of Education not only adopts a policy of prudent avoidance with respect to not endorsing the installation of any mobile telecommunications facilities on school property, but also quotes a preferred distance of at least 500 metres from the boundary of any school property. The proposed site of this DA is well within that exclusion zone.

6:0 Location:

This site was overwhelmingly rejected by the community in 2015, and nothing has changed since other than we probably have even more residents and children walking through this park on a regular basis. The site is in direct line with a pedestrian route between the Alan Newton Reserve, at the north west corner of the Griffin Road bridge, and the Children's Play Area immediately next to the Park Street pedestrian bridge. This area of the lagoon has recently been rehabilitated at considerable cost, including funds from the Environmental Trust, thanks to the efforts of our local State Member. The installation of the proposed facility will greatly impede pedestrian traffic when any sporting activity is taking place, and will directly impact public enjoyment of this area of the lagoon.

In summary I urge Northern Beaches Council to reject this application for all of the above reasons. Furthermore, I request that Council take action to prevent any future application for mobile phone facilities being put forward for anywhere on John Fisher Park.



Chris Thomas

John Fisher Park Community Group