



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

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Northern Beaches Independent Planning Panel
Sent via email to: carley.sawyer@northernbeaches.nsw.gov.au

For the attention of: Mr P. Biscoe, Chair

Dear Mr Biscoe

DA2020/0661 - HUSTON PARADE, NORTH CURL CURL - CONSTRUCTION OF A TELECOMMUNICATIONS FACILITY WITH ASSOCIATED EQUIPMENT - ADDITIONAL WRITTEN INFORMATION FOR PANEL

I write with regard to the above matter.

Last Wednesday, the Northern Beaches Local Planning Panel, on behalf of Northern Beaches Council, deferred application DA2020/0661 until 14th October 2020 for the purpose of giving further opportunity to the public and the applicant to make submissions concerning the assessment report.

The purpose of this letter is to address the cumulative effects of co-location and the importance of the proposal to Optus in terms of coverage and need for the site.

Co-location

Council's assessment report has covered this adequately but, the potential cumulative effects from co-location were repeatedly raised by speakers to the panel. The idea put forward by speakers is that other network providers such as Telstra can co-locate on the proposed structure and that this facility would end-up looking like other unattractive telecommunications facilities, such as that at Collaroy Plateau, that are detrimental to visual amenity. One speaker said that the proposal could end up with three times as much equipment on it in the future due to co-location. This is incorrect.

The light pole that is being swapped out for this proposal would have just sufficient capacity for Optus current proposal and future upgrades. The new pole structure will be assessed and built based on Optus loading requirement only and likely that there is no further structure capacity for any other carriers to co-locate. Any co-location on new structure may require pole strengthening or a further pole swap out and thus another development application which would be required to be submitted to council.

Any future development application would have to be assessed on its merits, just as this application should be judged on its merits and not hypothetical future expansion. Therefore, cumulative impacts from co-location would be managed and assessed by council through the development process.

In addition, the light pole will be retained in ownership by Council and not Optus (unlike the other sites cited such as Collaroy Plateau which is owned by a commercial tower operator). This means that any



co-location would require landowners' consent from Council for additional equipment on the pole and also additionally would require consent from Crown Lands (Department of Planning Industry and Environment) for any equipment on the ground. The result of this is that Council would retain full control over any future co-location and thus be able to manage cumulative impacts from additional infrastructure by other carriers via the property and planning process.

Optus Coverage Maps and Need for the Facility

Council's assessment report has covered the network coverage "black hole" and the need for the proposal facility and it was further addressed in my letter dated 16th September 2020, but, again, the this matter was repeatedly raised by speakers to the panel and therefore is addressed again below.

The maps referenced on the Optus website by speakers to the panel are built using the latest tools so we can show you predicted Optus mobile outdoor coverage. These can be found at:

<https://www2.optus.com.au/MapBlasterLite/Wholesale.html>

Optus' coverage maps also include planned rollouts. These predictions are based on rollout schedules available at the time of publication. The coverage maps do not indicate existing service levels predicted inside buildings and other structures. Optus have not individually tested every particular location within the outdoor coverage area.

The Key displayed on our coverage maps states;

- (a) "4G Plus - Outdoor" which predicts 4G outdoor coverage at 700MHz;
- (b) "3G - Outdoor" which predicts 3G outdoor coverage at 900MHz; and
- (c) "3G - With Antenna" which predicts 3G coverage at 900MHz in a car with an external antenna.

Whilst these coverage maps may show that outdoor coverage is 'great', the coverage information submitted with the DA and in the response to submissions letter tells a different story and is based on existing coverage and not planned coverage. Coverage predictions submitted in these documents show areas to the north and south of the proposed facility have deficient coverage. Coverage is indicated by service levels which are used to deliver voice calls, web browsing and applications, downloading and video services.



Coverage issues have been detected since our first planning application in 2016 and recent reviews show that customer numbers and usage are increasing year on year - which will further degrade the issue.

I hope the information provided is sufficient to cover these points that have been raised however we will be available to answer any questions raised in relation to the development at the deferred meeting on 14th October.

If you have any questions, please do not hesitate to contact me on 0406 368229.

Yours sincerely

A handwritten signature in cursive script that reads "Jon Mills".

Jon Mills
Associate Director