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MRS Cheney Noelene
28 - Ennerdale Ennerdale CRES
WHEELER HEIGHTS NSW 2097
Cheney51@optusnet.com.au

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

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We, the respective owners of 28, 30 & 42 Ennerdale Cres, Wheeler Heights note the following; There are a considerable number of public responses. Those supporting the tower do so on the grounds that the mobile telephone reception in the Dardanelles is currently inadequate. The owner of the site RSL Lifecare is a corporation with a the potential to gain a commercial advantage from the arrangement.

RSL Lifecare was referred to the Australian Charities and Not for profit Commission (ACNC) for serious issues relating to charity governance in 2016, and as a result gave enforceable undertakings to amend their practices. <https://www.acnc.gov.au/media/news/acnc-takes-compliance-action-against-two-rsl-charities>. Care should be taken at every step to ensure independent fact checking is carried out where this organisation is concerned.

The independence of Visionstream Pty Ltd in making their report is not clear. Indeed, the report was made on the direct request of the RSL Lifecare and Visionstream appear to be acting as their agent.

The health impacts of 5G radio transmission technologies have not been adequately tested. It seems likely that these technologies would ultimately be installed at the proposed site regardless of possible health consequences due to the large commercial considerations involved. This is likely to occur without either consultation of or notification to council or to local residents.

The NBN is shortly to be installed to the area, and is likely to be complete before the proposed tower is operational.

We, the respective owners of 28, 30 & 42 Ennerdale Cres, Wheeler Heights object to the proposal based on the following;

1. The proposed tower is unnecessary to provide telecommunications coverage to the residents of the Dardanelles. Coverage might also be reliably provided through the following means (although they will not provide opportunity for a direct commercial advantage to RSL Lifecare);

a) The installation of a tower on the opposite shore of Narrabeen Lagoon East of Deep Creek or from the Narrabeen Sports and Recreation Facility neither of which is located near residential zones. From these locations (particularly the former), the tower would face the Dardanelles without the need for a 40m tower to provide adequate aspect over the hill. The former location might also illuminate the Northern face of Collaroy Plateau, providing improved reception to that area. The application fails to consider these less profitable (for RSL Lifecare) locales. No radio maps from Telstra are provided. In fact, no Telstra documentation seems to be included in this application at all.

b) Visionstream themselves indicate that Candidate B (panels mounted on an existing building at 3 Lakeshore Drive) is considered an appropriate site (p8).

c) No consideration is given to a smaller number of panels installed down in the Dardenelles on a less intrusive structure. This would adequately provide services and irradiation to those who desire it.

d) Whilst the Dardenelles may be in need of mobile phone coverage, panels on the proposed tower point in three different directions. No need has been demonstrated for mobile phone coverage in the additional directions.

2. The health risks to local residents from long term exposure to radio emissions. Whilst the application states "Emissions from the proposed facility will be significantly below the Australian Radiation Protection and Nuclear Safety Agency standards adopted by the Australian Communications and Media Authority", no remedy is discussed relating to breaches of these standards.

No ongoing provision is made for independent testing of emissions for the proposed site.

Furthermore, the application states "The proposed installation will provide possible opportunities for future co-location on the monopole by other carriers". No guarantee relating to emissions has been made by those carriers. Furthermore, the EME report fails to account for additional emissions by these carriers.

No comment is made in relation to the impending advent of the 5G telecommunications network. This technology uses technologies which have not undergone sufficient testing, but are likely to be rolled out nonetheless for commercial advantage. No guarantee is made that this equipment will not be installed at the site. Indeed the technology is not addressed in any way in the application.

<https://app.secure.griffith.edu.au/news/2017/08/17/concerns-rise-over-potential-adverse-health-effects-of-5g-technology/>

5G technology uses a 'beamforming' technique which alters the phase of each of many aerials in such a way as to 'spike' reception in a particular location. This can be achieved by making the peaks and troughs of the radiowaves from each of the antennae stack up in a coordinated fashion at the targetted location. Consequently, measurements of radio-waves in other locations do not adequately describe the power of the radio signals at targetted locations.

There is no indication in the application that the health effects of beamforming technologies have been considered in the EME report.

Council should require as a condition of approval that RSL Lifecare accept liability for short and long term health related complaints resulting from operation of the tower, regardless of the duty of care of the telecommunications corporations using that tower. If they fail to accept such liability in writing, consent to build the tower in the first place should not be given, and an alternative location for the equipment found.

3. A 40m tower at that location would be unsightly, and would dominate the local skyline, towering significantly over the surrounding canopy. The artist's impression provided on p 11 - figure 24 is a misleading representation of the height of the structure (as noted by Mr PHILPS of Lakeshore Drive). The claim in the Visionstream document that "The implementation of a monopole and medium scale height ensures that the facility will not impact on the vistas from these public viewpoints or the valued landscape qualities in the region" (p27) is only qualified by the said misleading artist impression. The paragraph is included to satisfy Principle 1g in the table on p15-19. Unfortunately for the applicant, simply stating something doesn't make it true, and in this case it is not. The applicant has failed to satisfy principle 1g.

The minimal impact would be provided by an alternative site; if not across the Lagoon, then Candidate B.

Notably, the table includes reference to the potential for the tower to be extended (presumably upwards) for co-location purposes. The visual impact of such an extension should be accounted for immediately.

Interestingly, the application (page 7-8) considers that of three candidate sites where the two other sites are pre-existing buildings, the addition of a 40m freestanding tower provides the "minimal visual impact to the area". Given the artist's impression of the potential installation at

Candidate B (p9), we believe this statement to be patently false.

Also interestingly, the only reason Candidate B was not selected for the site was that "The consultation with residents and RSL Lifecare management concluded that residents would be more amenable with a new monopole facility nearby than a rooftop facility at the proposed location". No further details regarding the "consultation" are available. As previously indicated, the RSL Lifecare Management is subject to an undertaking to the ACNC for past transgressions. The Council should not trust RSL Lifecare to implement such a consultation. Independence and transparency are required.

The area is not an industrial zone, and the permanent installation of industrial equipment is inappropriate. A heritage listed structure of similar height was recently removed from Collaroy Plateau (the water tower) for this reason. The skyline of Collaroy Plateau was considered more important than the heritage listing of the tower. The skyline of Wheeler Heights should be similarly respected.

4. No independent survey is provided relating to the accuracy of the fire map. It is notable that the site almost immediately impinges on a Category A fire zone. Given that a large tree must be removed and 70 percent of another pruned for the installation of the tower, it seems likely that the fire map is not accurate or out of date or both. An updated map should be commissioned from an independent surveyor.

5. Several critically endangered bird species are known to inhabit the area around the site. Other critically endangered species are deemed likely to inhabit the area. The proposal fails to address how these species will be either affected by or protected from the works and the operation of the site. The Application form submitted to council has ticked "no" at section 2.3, indicating that the site does not contain critical habitat. This is contested by the Environmental Protection report, and is a clear example of misrepresentation on behalf of the owner.

6. The notification map does not extend to those inside the radius of the EME report (ie to a radius of 500m). Most notably the notification map fails to include those residents in the retirement village itself. There is no guarantee that any notification provided by RSL Lifecare (if any exists) to those residents complied with council notification standards.

The EME report covers a range of 500m from the proposed tower. All residents and owners inside this range should be provided sufficient notice that they can obtain necessary evidence to support comments, and time to compile those comments. The existing notification map is patently inadequate, and should be revised by Council.

7. Ownership of the land on which the proposed site is located was originally granted for the exclusive purpose of the exclusive benefit of War Veterans. The grant included a clause to the effect that if the land were to be used for another purpose, ownership of that land would revert to the Crown. The proposed purpose of the land is for commercial benefit of Telstra Corporation, and presumably for the commercial benefit of RSL Lifecare. Council should require RSL Lifecare to relinquish ownership of the affected site to the Crown if this application is approved.

8. Political Donations. Section 2.8 of the application form indicates that no political donations exceeding \$1000 have been made in the last two years by any person with a financial interest in this application. Visionstream is not in a realistic position to make such a claim on behalf of RSL Lifecare. Council should query whether any organisation with a financial interest has made a similar donation.

Furthermore, given the ACNC matters, Council should require that each person either in Management or on the Board of RSL Lifecare make a similar declaration so that section 2.8 of the application form is a) transparent, and b) refutes a defence of "I didn't know X made a donation".

Indeed, political donations formed the basis for Chapter 10 of the ACNC report (https://www.finance.nsw.gov.au/sites/default/files/inquiry_report_cfa.pdf) (p448) which resulted in the ACNC sanctions against RSL Lifecare in 2016.

Jointly agreed statement of respective owners of 28, 30 & 42 Ennerdale Cres, Wheeler Heights.