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**Sent:** 12/10/2020 3:43:25 PM  
**Subject:** Submission to Northern Beaches Local Planning Panel  
**Attachments:** DA20200661 Submission.pdf;

Carly

The attached document is a submission to the Northern Beaches Local Planning Panel relative to **DA2020/0661.Construction of a Telecommunications Facility with associated equipment.**

Kind regards

Lance Stockdale

**Subject: Submission for NBLPP meeting on Optus mobile tower in Curl  
Curl -  
DA2020/0661**

Lance Stockdale  
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Curl Curl

11 October 2020

Optus has submitted numerous DAs for the establishment of a monopole mobile tower at different locations on crown land in the Curl Curl area - each one has been emphatically refused. The last proposal DA2017/0298 (Adam Street Sports Ground Curl Curl), which is very similar to the current proposal, was comprehensively rejected subsequent to an IHAP hearing. Now, just a short 3 years later, the current DA has inexplicably been recommended for approval on all the criteria the previous proposal was denied. Consequently, the complete reversal of assessments between the respective DAs warrants satisfactory explanation.

Optus states the proposed telecommunications facility is required due to a lack of mobile phone coverage in the immediate Curl Curl area. The consensus of households in the Curl Curl area suggests that the Optus mobile service is acceptable, although not necessarily perfect for every customer. This opinion is verified by the very small number (14) of submissions supporting the establishment of the proposed mobile tower.

With reference to the Optus website for Optus Mobile Network Coverage, the 3G/4G coverage for the whole of the Curl Curl is rated :  
Voice & Text = Great; Email = Great; Internet = Great.

By contrast, the S2711 Optus Curl Curl Coverage document submitted as part of this DA shows a coverage map identifying blackspots where there is "unacceptable" coverage. The same document also shows that the installation of the proposed new tower will improve mobile service for approximately half of the blackspots, primarily in a small area of Wingala roughly bounded by Griffin Rd, Headland Rd, Delaigh Ave and Abbott Rd.

Obviously there is some dissonance between Optus mobile users, Optus Mobile Network Coverage website and the submitted S2711 Optus Curl Curl Coverage document. The onus is therefore upon Optus to provide compelling evidence that there are serious mobile service inadequacies that must be rectified. Furthermore, Optus needs to demonstrate that the proposed tower and ancillary equipment is essential to the provision of customer service and necessarily must be located in or near a riparian zone on crown land.

Again with reference to the S2711 Optus Curl Curl Coverage document, the map shows the Curl Curl area surrounded by Optus 4G mobile base station antennae. A 4G mobile cell has a typical range in suburban areas of 1-3 kms. This means that the identified Curl Curl blackspots are well within the range of existing Optus base stations, especially the one located in Winbourne Rd Brookvale. Optus therefore needs to provide assurances that a solution to unacceptable coverage cannot be addressed by modification of existing infrastructure or the location of a mobile tower at a site more acceptable to the community.

Considering the unstated objective of Optus is to expand its mobile product offerings into the Curl Curl area to include Home Wireless Broadband (fixed wireless internet) as part of a competitive market strategy, then this is hardly justifiable in terms of service imperatives when Optus already provides equivalent capability through the NBN. The whole Curl Curl area has access to the NBN FTTC (fibre to the curb) which is capable of superior data transmission speeds compared to the mobile network as well as circumventing the problems caused by mobile blackspots.

The incremental developments over a number of decades have accumulated to form the present John Fisher Park, for better and for worse. Each development becomes the precedent to substantiate the next development. In the case of this DA2020/0661, an existing light pole becomes the precedent for a mobile tower with a flood light. It is therefore inevitable that the approval of this DA will be followed by similar applications from other telcos. As technology advances and service requirements grow there will be inexorable changes required to mobile towers and ancillary equipment. Once this tower is in place there will be no in principle reason to refuse any of these subsequent developments.

In summary, I strongly object to the location of the proposed mobile tower and ancillary equipment as Optus has failed to provide convincing evidence of need. The vast majority of the community (over 96% of submissions) have clearly indicated they do not want a tower and ancillary equipment on John Fisher Park. The very small proportion of submissions supporting the application implies that Optus mobile customers are accepting of the current quality of service.

Regards  
Lance Stockdale