

## Numerous inaccuracies in the DA

- no accurate description of 'work to be carried out' - p1  
Is this because the applicant is unsure as to what specific equipment will be used at the site. Will this particular site higher frequency emissions for its proper functioning? The only information regarding is provided in EME report where it is presumed the equipment installed will be of the lowest RF emitting type.
- The address of the EME report is at 978 WC road, where is this in relation to development? p9 It is certainly not the site of the proposed tower.  
This is a major inaccuracy and makes any estimated readings for EMR invalid
- EME report contains inaccuracies regarding the potential impacts on neighbouring residences as advised by APANSA to one of the landowners. For example the predicted readings are estimated at 1.5m above ground level, assuming level ground. p10 This is clearly not the case. Any further reference to this report in the DA should be considered erroneous. Further information will be provided regarding these multiple inaccuracies.
- AHIMS search result states there are Aboriginal sites recorded/declared at site p12 The issue has not been investigated further. There has been no consultation with any of the local custodians regarding this.
- dwellings in close proximity to the tower not shown in locality plan p29
- cover letter states that consent should be obtained from Bega Valley Shire Council?? p34  
Why would this be the case?
- 'improved services and coverage' ...are offered only to customers of Telstra, i.e unless a person is providing financial remuneration to the company they will not benefit. This makes the proposal primarily a financial one p40
- Blackspot program is mentioned. Why do people not have choice as to whether they would actually like to be in a 'blackspot'. Many of the residents in the valley live there because it IS a blackspot! p40
- 'Land use in this area is typically of low intensity, as reflected by the zoning. ' The proposal minimises potential impact by omitting to provide details of surrounding dwellings e.g. 'a sparsely populated rural area' p43
- the level of benefit to 'public safety' is questionable given the proposed siting in an 'isolated rural road' p43
- 'travellers receiving potential life saving service' ...WilsonsCreek road is a no through road and as such does not receive many 'travellers' p45
- the 'gap in quality services' in the area is misrepresented. The area was just connected to the NBN providing high speed broadband network p45
- the 'list of consequences for not proceeding' is fictional p45
- Site selection ...There was a letter sent to all residents of the area offering financial compensation to any landowner to site the tower on their land. Nobody responded with a yes. Was Telstra then forced to site this on its own land as a last resort? p46
- the other 2 sites considered are considerably more elevated than the proposed site and at both these locations the 35m pole was the preferred option. The site selected was done so on the

basis of 'cost and feasibility' [the easiest and cheapest option]. The efficiency as to the provision of services does not appear to be a priority, leading to the high probability of further 'facilities' in the area p49

- DA states that BSC will 'notify community stakeholders'. Neither Telstra or the applicant have attempted any community consultation p50
- The Telecommunications Code of Practice 1997 as referred to has been replaced by the new code of 2018 and as such should be the legislation referred to p51
- The 'physical characteristics of the locality' have not been investigated. The only information provided is the elevation of the site [176 AHD]. How will the escarpments and steep rock faces along the valley impact the functioning of the proposed tower? p53
- The computer generated image as to the visual impact of the tower is misleading. The power pole in the foreground is 10m and the proposed tower is 35m. The image would indicate the proposed tower will only be double the height of the pole and this is clearly not the case. p62
- 'Antennas need to have a direct line of sight to the area they are servicing' Given the terrain of the area just how far will this line of sight extend? How effective will this tower be in providing connection to mobile devices in the area? p64
- 'Antennas cannot be placed below a topographical line' ..give the proximity of vertical valley walls this is clearly what will be happening at this proposed site p64
- 'views of the proposed facility are limited to locations within close proximity' Does this mean that the necessary 'line of sight is therefore similarly limited? p65
- It is debatable as to whether a 35m tower constitutes 'minimal visual impact' p65
- The socio/economic rationale given is spurious. The NBN provides connectivity for businesses in the local area. The lack of mobile reception on the short drive into or out of the valley would not have a major impact on anyone running a business from the area p65
- The negative effect on surrounding house values in this area cannot be compared to metropolitan areas, many people have located to the area to be free of EMR p65
- There is no consideration of the impact on local flora and fauna. Whilst it may be true that there will be no direct impact in the few square metres of the site during the construction of the proposed tower, the issues arising from its operation have not been addressed. There are numerous reports of adverse impacts on especially fauna, including insect and bird life. These will be made available as separate documents p66
- Indigenous heritage - again the wider impacts of the operation of a microwave tower at the site has not been considered. Consultation with relevant local indigenous people needs to be undertaken p66
- 'soil erosion' the adjoining road is noted to be water impacted. There are permanent potholes in the road in the adjacent area. This area is also flood prone. None of this has been considered given that a 35m tower would have some weight to it and require stable substrate for its construction and ongoing stability. p67
- The site is in bush fire prone land. There is no consideration as to the risk of the facility being a fire risk itself due to the electrical requirements of its operation. Will the proposed tower be vulnerable to lightning strike? p67

- States that the 3G transmitter is the type proposed for the site. This technology is becoming obsolete and can not reflect the actual use proposed p69
- 'considering the very low research results collected to date' 'there is no convincing evidence to date' ...this is a relatively new technology, and developing continuously, so there cannot be enough data to establish long term health effects of increasing levels of EMR p69
- The 'cumulative environmental effects' have not been accurately considered on many of the issues as previously mentioned p70
- The 'strength of RF fields diminishes with distance' ...the incorrect document provided to assess EME impacts in the DA states this is not the case. According to that report the maximum effects are noted at approx 200m from the tower. p70
- The statement that the facility will be 'well screened by natural vegetation' is false. There are no 35m trees in the vicinity. This tower will definitely impact on visual amenity p70
- 'strategically sited and designed to minimise visual impact' Again how does this work when the proposed tower is needed to provide direct line of sight? p71
- 'does not have any significant environmental impacts' There is not enough information provided in the DA to come to this conclusion p71
- RPX 310B antennae x6 are stated on final page of DA p81. These are totally out of context to the rest of the DA. This type of system is not mentioned in the environmental EME report p11 and therefore the potential EMR readings have not been provided.