

Possible Objections to DA 10.2018.233.1

or use your own by all means

Option 1: – do it now and leave here tonight

1. choose one or two objections that speak to you from the list below
2. write your objection in the blank space provided in the middle of the **Objection Letter** at the end of this list (change the wording slightly for greater impact!)
3. leave it at the hall for jamie to mail/deliver/email to council

Option 2: - tick off preferences and I do the rest

1. Circle one or two objections that have meaning to you
2. Sign the bottom of the form permitting me (jamie) to send on your behalf
3. leave at the hall for jamie to mail/deliver/email to council

1. The area of the proposed site has a documented history of soil instability, including flooding, slippage and sinkholes. The DA includes no geotechnical report and thus fails to address this situation. Of related concern, work upon the affected Council road reserve is to remain unspecified pending approval of DA.

2. Mobile phone tower fires caused by electrical fault or lightning strikes are not uncommon. The DA's lack of a fire management plan dedicated to this risk poses a threat to life, property and protected natural environment. Page 5 of the Bushfire Protection Assessment admits to an "inability to clear vegetation". This inability serves to exacerbate said threat.

3. According to published real estate reports and advice from local agents, the proposed tower would significantly reduce the value and saleability of surrounding properties. This in effect imposes a financial loss upon the owners of said properties without fair and just compensation.

4. Thousands of peer-reviewed studies indicate adverse biological effects from EME at field intensities comparable to (or below) what persons living within 500 metres of the proposed tower will be subjected to on a continual basis. Copies of these studies are available for Council's perusal upon request. Such effects far outweigh any benefit of the proposed facility.

5. The proposed 35 metre tall monopole constitutes a significant loss of scenic amenity to residents within line-of-sight, and additionally to visitors to the area. As such, the tower appears to conflict with the purpose and performance outcomes of the Scenic Amenity Overlay Code.

6. The DA contains no species impact statement and fails to adequately address biodiversity. The proposed facility is located within an area of significant environmental value and thus subject to Council's sustainability and harm

reduction criteria. Numerous studies indicate that mobile phone towers adversely affect plants and wildlife through both physical interference and emitted radiation. Copies of these studies are available for Council's perusal upon request.

7. The soil surrounding the Telstra exchange that currently exists upon the proposed site may be contaminated with toxic materials such as asbestos, lead and industrial chemicals. The DA contains no undertaking to test the soil and remove found contaminants.

8. According to prior experience, additional telecommunications services will inevitably be co-located upon the proposed tower. The EME Report does not address the impacts of accumulated infrastructure nor its contribution to overall radiation levels, thereby effectively denying public and Council scrutiny and approval of same.

9. While referencing incentives for better phone coverage, the DA fails to acknowledge a statistically valid expectation of injurious human microwave exposure and inattentive driving accidents caused increased personal use of mobile phones and other wireless devices within the area to be serviced.

10. Telstra's corporate literature includes EME health risk assessments. The company also periodically texts their phone subscribers advising how to minimise their microwave absorption. No such information has been provided by Telstra or its agents to residents who will be exposed to EME from the proposed tower.

11. In a probable attempt to overcome propagation losses due to uneven terrain at the selected site, the tower is specified to operate within the relatively low frequency range of 700-850MHz. Unfortunately, this is the bandwidth of microwaves most readily absorbed by human body tissue. An alternative site without this constraint would thus be preferable in terms of minimising harmful discharge.

12. The DA specifies no particular methods to mitigate the visual impact of the tower or its ancillary buildings, e.g. painting the structures a neutral colour. The DA includes no Construction Certificate or other document for determination of what such measures, as stipulated by various codes and guidelines, will be implemented.

13. Persons living in proximity to the proposed tower would be exposed without consent to a form of electromagnetic radiation classified as a "possible carcinogen" by the World Health Organisation. Other official bodies provide similar or more critical warnings. Said exposure may constitute tortious assault or trespass under Common Law.

14. Telstra's definition of "sensitive" locations to be avoided as phone tower sites is limited to schools, hospitals, high density housing and the like. This constitutes an admission of potential harm, and unfairly discriminates against persons who may be equally susceptible living or working in less populated areas.

15. The EME report included in the DA only provides antenna field intensity data calculated for 1.5 metres above ground level, yet some affected residents on surrounding nearby slopes are exposed line-of-sight to the top of the tower.

16. No indigenous assessment of the proposed site has been conducted. Even though the soil has previously been disturbed, erection of the tower will require far more extensive earth works.

18. The proposed Telstra does not adequately incorporate the Precautionary Principle as defined in Council's "Greenprint for a Sustainable Future". The ARPANSA public exposure standards for EME applied in the DA are based upon a review of scientific literature that is incomplete, outdated and diverges significantly from the opinion of other expert and official bodies worldwide.

19. ARPANSA routinely qualifies its standards as being continually "under review", inconclusive and unreliable as ultimately safe. Given such absence of a reasonable presumption of safety, proliferation of EME emitting technologies upon unwitting persons may constitute experimentation in contravention of the UN's Universal Declaration on Human Rights.

20. Telstra claims "no health effects" are attributable to EME, yet fails to refute the adverse biological effects indicated by thousands of accredited studies. A legal definition of health is, "Freedom from pain or sickness; the most perfect state of animal life ... the natural agreement and concordant dispositions of the parts of the living body." There is nothing "natural" or "perfect" about induced adverse biological effects. Should the DA be approved, Council may be assisting Telstra to impair the health of those within its care.

21. The DA fails to disclose the impact of the tower upon the local power grid and whether or not additional infrastructure will need to be constructed to maintain service tolerances obligatory upon the electricity provider. The DA does not mention a backup generator. If one is to be installed, or used intermittently, issues such as noise and exhaust pollution remain unaddressed.

22. According to written legal advice from the Environmental Defenders Office, a telecommunications tower such as the DA proposes is not a "permissible development" within the applicable zoning. A copy of said advice is available for Council's perusal upon request. I call upon Council to defend its LEP with due diligence.

June 27, 2018

Submissions

Byronshire Council
70-90 Station Street
Mullumbimby, 2482

Attn: Mark Arnold, Chris Larkin, Greg Smith, Simon Richardson, Paul Spooner, Sarah Ndiaye, Jeannette Martin, Michael Lyon, Alan Hunter, Jan Hackett, Cate Coorey, Basil Cameron

Dear Sir/Madam,

Re: DA 10.2018.233.1 Submission to Byron Shire Council
Proposed Mobile Telecommunications Facility at Wilsons Creek

I _____(full name) for the reasons given below do hereby request Byron Shire Council to not approve DA 10.2018.233.1 for a Mobile Telecommunications Facility at Wilsons Creek.

Name: _____ Address: _____

Signature: _____ Suburb: _____