



CLARENCE ENVIRONMENT CENTRE Inc

87-89 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 4611

Web site: www.cec.org.au

E-mail: admin@cec.org.au

Date: 1st July 2019

Attn Andrew Johnson
Consultant Planner Catalyst O.N.E. Pty Ltd
(on behalf of Optus Mobile Pty Ltd)
consultation@catalystone.com.au

Dear Mr Johnson

Re: Proposed mobile phone tower at Lot 1 DP214989 Careys Lane, Harwood

The Clarence Environment Centre has maintained an office presence in Grafton for the past 30 years, and has a proud record of environmental advocacy. Our members have always sought to ensure that development proposals maintain the highest standards and principles of ecologically sustainable development.

The following image shows the boundaries of Optus' chosen site, 88 Careys Lane, outlined in red. It also shows the property contains trees and other vegetation, much of it native, that represents wildlife habitat.



Background

The yellow lines indicate the approximate boundaries of land zoned E2 environmental protection, which not only contain rare remnant floodplain vegetation, but also partly mapped as a Coastal Wetland to be managed under a State Environmental Planning Policy (2018).

By way of background, the E2 zoning was applied during the rezoning of adjoining land as Working Waterfront several years ago. We are led to believe that protective zoning came about, in part, during the consultation process in which the Clarence Environment Centre's identified that vegetation as significant.

The subsequent E2 zones were apparently applied without advice from suitably qualified persons, which has resulted in this fragmented abomination, with no buffers or connectivity. This has left the Council, and the community, facing a ludicrous proposal to site a toxic industrial waste pond between the two E2 portions, something that is apparently acceptable because of the current zoning.

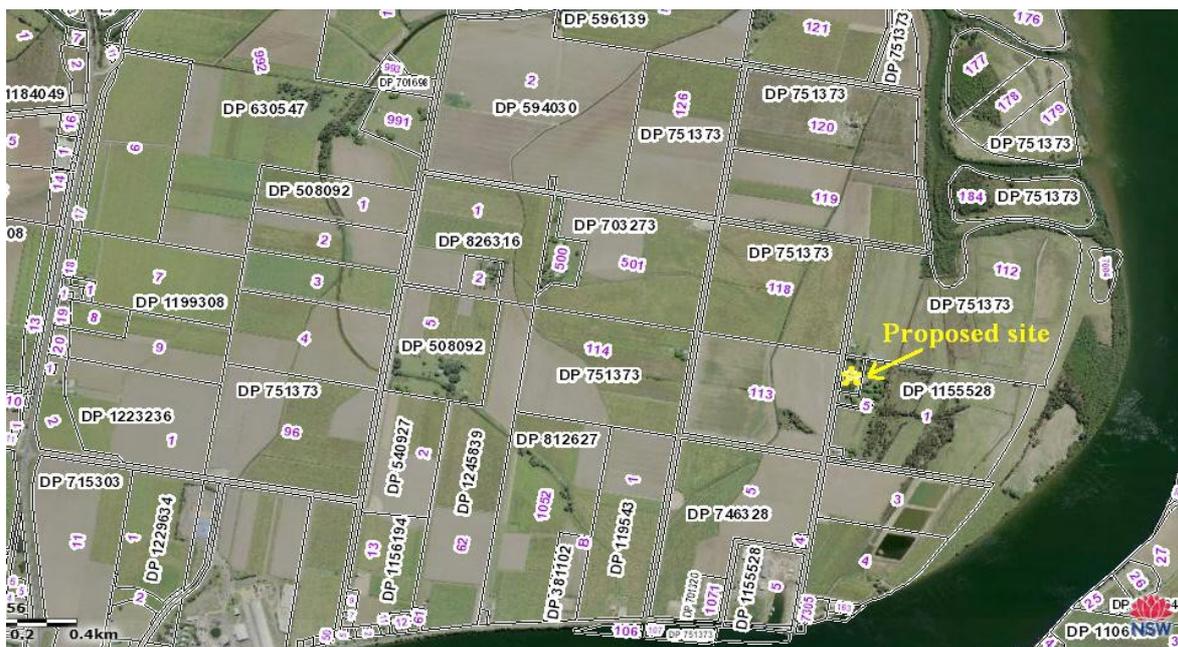
The Optus Tower proposal

Ideally, and the above image clearly illustrates this, the E2 zoning should have been contiguous and even extended to include the relatively timbered property adjoining Careys Lane, which combines to provide crucial habitat for local wildlife.

As it is, that hasn't happened, and now Optus has chosen Lot 1 - DP214989 for a communications tower. That choice will undoubtedly require the permanent removal of an unspecified amount of vegetation that is currently serving as a wetland buffer, and providing a food source for a wide variety of bird life that has made the E2 area home.

Health implications

Then there are the health implications which have seen legislation enacted that bans the erection of these towers within 100m of homes in urban residential areas. Incredibly though, such buffer protection is not provided to rural residents, where these towers can legally be erected almost on top of their homes. Looking at the image below, the question has to be asked, why, given all that open, unoccupied, cleared space available in the immediate vicinity, has Optus chosen to build its tower within a cluster of homes, where native vegetation will need to be cleared?



A final concern is the seemingly acceptable process that allows Optus, and others, to declare their proposals to be "compliant developments", conveniently avoiding Council scrutiny. In this instance, the 4m deep foundations can be excavated without question, even though previous testing in the area has shown that acid sulphate soils occur just one metre below the surface. How can this be permitted when local cane growers are forbidden to even deepen drains without approval because of potential acid sulphate pollution?

We thank you for this opportunity to enter an official objection to this proposal, and sincerely hope our concerns will be properly considered.

Yours sincerely
John Edwards (Honorary Secretary)