



Mr Malcolm Turnbull
House of Representatives
Parliament House, Canberra, ACT 2600

email: malcolm.turnbull.mp@aph.gov.au

Dear Mr Turnbull

Re: Proposed Fixed Wireless Facility 149 Peak View Road, Numeralla NSW 2630

I write on behalf of Wildcare, a wildlife rescue and rehabilitation group with over 250 members. We strongly object to the proposed NBN Tower at 149 Peak View Road, Numeralla NSW, this location is in koala habitat.

Wildcare members have actively supported the conservation of the nationally significant population of koalas located to the east of the Monaro Highway between Canberra and Cooma. Our members work closely with wildlife rescue groups LAOKO & NARG to ensure that these koalas are rescued and rehabilitated whenever they are in need. Wildcare members have volunteered large amounts of time participating in koala survey work lead by NPWS. Tissue samples that our members have provided from koalas in rehabilitation or from road kills, has contributed to the genetic work of Sydney University. This work has shown that this koala population is genetically unique. Genetic diversity is important to the long term survival of koalas. As you would know, Koalas are listed as vulnerable to extinction under both NSW and Federal legislation.

Our concern is for the proposal's impact on the koalas that are known to range in the Numeralla area. The proposal will cut down and remove koala preferred feed trees, particularly Eucalyptus mannifera which is a koala favourite. As koalas have lived in this area for many decades, the koala population is likely to be at carrying capacity and therefore the permanent removal of koala feed trees is likely to cause nutritional stress which leads to koala mortality.

On page 20 of the "Statement of Environmental Effects" prepared on behalf of NBN Co Limited by Visionstream in December 2014, The NSW Telecommunications Facilities Guideline including Broadband 2010, Principle 2: "Telecommunications Facilities should be co-located wherever possible." The response to this section states that there are currently no existing telecommunication facilities in the vicinity. This is true, but as both the Rural Fire Service and the NPWS are looking into improving two way telecommunications in the area, we believe a co-located site on the top of Numeralla Mountain at a height of 1237 metres above sea level, should be investigated. Construction and or lease arrangements could reduce the cost of developing the site. As I understand it, the proposed NBN tower site at 149 Peak View Road at only 770 metres above sea level, would be unsuitable for both the Rural Fire Service and NPWS due to its much lower elevation. The higher mountains around the site, would significantly restrict communications from a tower at 149

Peak View Road. There is also a push from locals to get mobile phone coverage in the area around Numeralla and again Numeralla Mountain would be the ideal place for a mobile phone tower.

At a community meeting at Numeralla Hall on Monday 19/01/2014, a map developed by the Rural Fire Service was presented and it clearly showed that Numeralla Mountain at a high of 1237 metres above sea level, provides advantages in being able to service a much larger area than the proposal site of only 770 metres above sea level at 149 Peak View Road.

Also at this community meeting, a number of concerns were raised, including community concern about the impact on koalas. The response from Visionstream on behalf of NBN Co, to the community concerns in relation to koalas is limited to a few paragraphs copied below in full

Environmental/Koalas

NBN Co undertakes a comprehensive review of the statutory framework prior to the submission of a development application to ensure full compliance with all applicable legislation. In this instance, it is not considered that a requirement for a formal environmental survey has been triggered, and therefore one has not been undertaken.

Notwithstanding, NBN Co seeks to limit vegetation removal to the minimum extent necessary. At Numeralla, existing power lines eliminate the possibility of utilising the currently cleared corridor on site; however the proposal has been sited as close to this corridor as is possible. Such siting of the facility allows NBN Co to minimise the extent of clearing required, while also avoiding fragmentation and reducing edge effects associated with the vegetation removal. NBN Co has further limited vegetation disturbance by proposing an upgrade and extension to an existing access track, rather than constructing an entirely new access route.

Should Council feel that issues remain outstanding in this respect, NBN Co would be happy to consider any request for information that Council may make.

There are advantages in developing a communications site at the top of Mount Numeralla, due to the significant height of 1237 metres providing a much larger service area. The Mount Numeralla location would also enable colocation of other telecommunication facilities, including two way radio and mobile phone. The advantage for the environment is that we end up with only one site, only one area of impact. While koalas do live on Mount Numeralla, the peak is exposed and rocky and the development of this site would be unlikely to have a negative impact on koalas.

I am very concerned that an Australian Company, funded by the taxpayer, is failing to do the right thing by koalas. I note that they are saying that there is no legislative requirement or trigger, but since when do we only do the right thing if we are compelled by legislation. Their approach is very un-Australian. If we can't can an Australian taxpayer funded organisation to do the right thing by Australian wildlife, then what hope do our wildlife have?

We do not want to stop the NBN Tower from being built, we just want it built in the right location. There is clearly a more suitable site, at almost 500 metres higher, at the top on Mount Numeralla! This site is a win for communication in terms of much larger service area and a win for the koalas.

Regardless of the site, as a minimum, there should be intensive koala surveys conducted over a 1km radius to properly determine impact and mitigations required at the site. There should also be compensation payable for each tree removed, to enable future strategic replanting of koala preferred feed trees.

Koalas need your help, as an Australian taxpayer funded organisation, NBN Co should be setting a best practice example and not only doing the right thing if compelled by legalisation.

Yours sincerely

Signed 

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