

Objection to Development Application

As residents of Tascott and living on Glenrock parade we are concerned that even with the current modifications, the proposed tower revision under DA56560/2019 remains severely out of character for the area and we ask that council reject the proposal given the current zoning objectives and the planning controls of Central Coast Council.

This proposal will have a considerably detrimental effect on the outlook from our dwelling, with the revised siting compounding this to even greater extent than the previous plans. View loss across our frontage to the water is a key concern and has not been addressed within either application.

The proposal in isolation to place a phone tower adjacent a railway line in an infrastructure zoned corridor is sound as noted in the application, however the application still fails to address that the infrastructure zone passes between residential private land at steep elevation and is also directly adjacent to an active waterfront precinct.

The Koolewong to Tascott frontage at which this DA is proposed is a narrow segment of residential dwellings set against the picturesque backdrop of Brisbane Water National park. Public space is at a premium in this area due to the restrictions of the typology that have formed the narrow corridor of residential space. Furthermore, most residents along this frontage addressing Brisbane Water enjoy an elevated view across the rail corridor and road to the waterfront and to Saratoga and Green Point beyond.

The Tascott and Koolewong stretch benefits from the rail infrastructure that serves the communities here, but beyond the unavoidable noise from the trains, the rail path is reasonably discrete and a necessary part of the success of the area. However, even at the modified height, a proposal for a 26 metre phone tower remains in stark contrast to the rural context and maintains a complete disregard for the Desired Future Character of the site and the wider Tascott and Koolewong surrounds.

Permissibility

The proposed development is permissible in the zone with Councils Consent.

The controls under which the development must adhere are outlined and addressed in some form in the Statement of Environmental Effects, however the application does not adequately address the objectives of the zone specifically or the objectives of the LEP And DCP. Not only are these objectives not adequately addressed in the SOEE, the proposal itself is in stark contrast with these objectives.

The objectives for the land Zoned SP2 in the Gosford Locality are as follows:

- 1. To provide for infrastructure and related uses.*
- 2. To prevent development that is not compatible with or that may detract from the provision of infrastructure.*
- 3. To ensure that development is compatible with the desired future character of the zone.*

The proposal meets with objective 1 and objective 2 has been addressed in the application, however objective 3 has once again been completely disregarded. When assessed against the Tascott 7: Transit Corridor – Desired Character the proposal does not comply with the objectives of the zone.

Note: Given the siting of the proposal may rest in the Koolewong Transit corridor, however statements against character apply regardless of the Desired Future Character Statement used.

For a development to be granted consent it must conform to the objectives of the zone and in this instance the objectives call up the Desired Character for the area. The proposal for a 26 metre tower is in stark contrast to the desired Character as evident by the following:

This corridor should remain a primary regional and state transit link, where future infrastructure maintains the scenic qualities of frontages that are prominent backdrops to Gosford City's tourist and commuter routes, and where improved standards of scenic-and-urban design quality are achieved.

Therefore any proposal should respect the scenic qualities of the Tascott area. The backdrop should remain that of the Brisbane Water National Park and not a phone Tower. A tower of this nature cannot hope to present as an improvement to the existing scenic standard of the urban design. In another location where it is not presenting itself in one of the most prominent areas of the public waterfront it may be able to be considered more sympathetic, however the revised site maintains complete disregard for sound urban infrastructure planning and a complete disregard for the value of the waterfront precinct between Koolewong and Tascott.

Promote a local identity for new buildings by reflecting the modest scale and character of Gosford City's traditional mid-Twentieth Century houses including walls of windows that are shaded by framed verandahs or exterior sunscreens, a variety of materials and finishes rather than extensive areas of plain masonry or metal cladding, and roofs that are gently-pitched with wide eaves or verandahs to disguise the scale of exterior walls.

The above statement relates to proposed building form of new developments; however it sets a strong visual image of the identity council are seeking for the area. This statement encompasses a desire for low rise, sympathetic and considerate development, even within the confines of the rail corridor. The tower proposed here cannot be seen as in keeping with the building form described.

For infrastructure compounds, provide a screen of shady trees wherever space is available.

Any infrastructure proposed in the rail corridor is described as requiring a screen of shady trees, further emphasising the direction of the Desired Future Character away from huge towering infrastructure and towards a more subtle low rise approach to any built form.

The trees in this location are kept heavily pruned given the thin stretch of land between rail transit corridor, road and power infrastructure along Glenrock Parade and therefore cannot be considered to adequately encompass the requirement for a screen of shady trees.

When looking at the character statement it is clearly evident the proposal for the tower cannot possible satisfy the objectives for the Zone under the DCP and therefore should not be granted approval.

View Loss

The Statement of Environmental Effects originally states the nearest dwelling is some 87 metres from the facility, but the revised location reduces this distance significantly and the elevation of properties overlooking the rail corridor is still disregarded. Assuming all safety requirements are met, the proximity of the tower to residential dwellings is not the primary concern, but the manner in which it interrupts the views from the residential properties remains the concern.

The revised tower location situates this proposed tower even closer to our property within our primary view, and will rest directly between our viewing height of some 35 metres and the body of water that is Brisbane Water beyond. Our view loss is not to the sky or Landmass which may be considered negligible or minor under *Tenacity Consulting v Warringah Council* (2004) NSWLEC 140 but prime waterfront view and so more closely aligned with 'severe; view loss. The negligible height reduction does little to diminish concerns towards our view loss and the potential property devaluation that may result.

The proposal addresses State legislation and its compliance with NSW Telecommunication Facilities Guidelines including broadband (2010) which states:

(g) A telecommunications facility should be located so as to minimise or avoid the obstruction of a significant view of a heritage item or place, a landmark, a streetscape, vista or a panorama, whether viewed from public or private land.

The applicant claims that the revised location moves the tower out of line of sight from Glenrock Parade, however line of sight at road level is not the concern. Nearby properties are elevated further above road level and the applicant continually ignores the viewing height of the nearest residents that this proposed tower directly affects. Unfortunately given our location and elevation, even in the revised siting we will lose views of Brisbane Water and the Koolewong Headlands to the South East and beyond towards Saratoga, as will many other private land owners along Glenrock Parade. This clause brings forth that any proposal should be sympathetic to view loss, even on private property, however the proposal maintains a disregard towards residents concerns.

Impact on the Waterfront Context

The proposal as an urban design outcome is not a successful outcome for the area. While infrastructure is required and appreciated, council may wish to consider that while other sites might incur higher construction cost they will not forever place an extremely visible eyesore on our waterfront for years to come.

It is worth noting that while the development is permissible with consent under commonwealth legislation, it requires the proposal consider a number of key points summarised in the table commencing on page 15 of the Statement of Environmental Effects.

Within the responses in this table it is evident the applicant still does not consider the Tascott waterfront to be of merit to the community. Commuters are considered, as well as casual road users, however those who reside here are still disregarded.

In response to previous objections, the applicant has done very little to lesson concerns about the visual impact of this proposed tower.

Item 4.1.5C – Community Sensitive Location

The site is indeed a community sensitive location. The argument that the rail corridor is not significant to the waterfront or residents would be sufficient if the proposal was a low rise small scale infrastructure compound, however even reduced to a 26 metre height this proposal will impose a significant negative impact on the surrounding waterfront and for residents regardless of its base being located in a rail corridor.

Item 4.1.5D – Avoid Community Sensitive Location

The applicant states that the community were consulted however as a resident who is facing severe view loss, we have received no consultation or communication outside of being notified by council.

As mentioned, previously, the proposal states that it addresses State legislation and its compliance with NSW Telecommunication Facilities Guidelines including broadband (2010) which states:

(e) A telecommunications facility should be located and designed to respond appropriately to its rural landscape setting.

The applicants response here is the trees will conceal the tower and it is set against Brisbane water National Park Vegetation, however it is not. This argument may be reasonable if the tower was viewed only with the bush land behind. In this instance however, the tower is approached generally from the North and South with Brisbane Water National Park to the West. For the general public and the users of the waterfront, the tower will still be in full view with no bushland backdrop due to the relatively flat nature and North South axis of the waterfront precinct. From a boat in Brisbane Water one may lose the tower to the National Park Backdrop, however from either vehicle or pedestrian view it will be extremely prominent and evident to the public domain.

We once again ask council to not allow such a structure that can have such a damaging impact on what is a developing and popular recreational waterfront location.

Siting

The applications Statement of Environmental Effects states on page 4, point 1 that the proposal aims to minimise the visual impact on the immediate and surrounding area.

This statement is made without supporting discussion and when considered in the context of the 26 metre phone tower should be considered as an unquantified statement.

The immediate area for the tower is a rail line, and in isolation a phone tower in a rail line would not raise concern, however, to only state that consideration has been given to the surrounding area does not produce an acceptable outcome. No consideration has been given beyond this statement.

The site proposed adjacent the Tascott waterfront precinct is generally flat across the rail line, Brisbane Water Drive and the recreational space. A tower of some 26 metres cannot be reasonably considered as providing minimal impact on the public domain in an area where there is no development that comes close to the scale of the tower proposed here.

Council should give careful consideration to creating an horrendous monolith on what is a highly utilised waterfront space and ask for a reconsideration of the project siting to the ridge above.

Mobile Coverage

The 3G and 4G coverage that Telstra claims the proposed tower will improve is an aging technology. Telstra's own website is heavily promoting the rollout of 5G technology, particularly in regional areas such as this proposed site, and how 5G can utilise existing 4G technology. In the context of this tower, the applicant appears to be misleading the community as to the technology that will be active at this site as any information regarding potential for 5G rollout is missing from their application. It does appear that the applicant is continually ignoring concerns regarding 5G technology, adding to our strong objection to this tower.

Thank you.

As residents of the area who wish to remain in Tascott and enjoy the area we thank you for your consideration and ask that the council act in the best interests of the concerned residents in the area.