

Address – 138 & 140 Davistown Road, Saratoga NSW 2251

DA Number – DA57958/2020

Development Application – 011.2020.00057958.001

I wish to object to development application 011.2020.00057958.001 currently with Central Coast Council by Kordia Solutions (on behalf of Telstra) for the following reasons:

1. Page 6 of the Statement of Environmental Effects report provided by Kordia acknowledges that the proposed site is zoned R2 – Low Density Residential. This proposal is 18.3m higher than the allowed maximum height permitted for the area – No 4.6 Submission is included to address this.
2. Page 8 of the report states that the intention of this development is “to increase coverage in the area with minimal adverse impact on surrounding environments and the community”. Clearly a 27m tall tower in an R2 zoned area is not compatible with minimal adverse impact.
3. Page 10 of the report states that “suitable candidate sites were examined” other than the proposed site. There is no evidence within this report of what other sites were considered or examined.
4. Page 11 of the report states that a thorough investigation of the Saratoga area and its surrounds was undertaken for a greenfield site, however there is still no evidence of this within the report.
5. Under section 1.3 on Page 11, “the proposed land use is consistent with the setting and generally compatible with adjoining land uses”. Clearly, a 27m tall tower is not consistent with the adjoining land use, being low density residential area.
6. Page 11 of the report also states “Visual impact – As the proposal involves the upgrade of an existing facility, it is considered that the proposed site will not result in unacceptable loss of amenity;”.
7. Table 2 on Page 20 states that as per (b), The visual impact of telecommunications facilities should be minimised, visual clutter is to be reduced particularly on tops of buildings, and their physical dimensions (including support mounts) should be sympathetic to the scale and height of the building to which it is to be attached, and sympathetic to adjacent buildings. Clearly the proposed development does not satisfy this requirement.
8. As per Table 2 on Page 21, (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 report states that the proposed development meets this requirement. We strongly suggest that the DA does not in fact meet this requirement.
9. Table 3 p 28 It is stated: “To ensure that non-residential land uses do not adversely affect residential amenity or place demands on services beyond the level reasonably required for low density housing.” The visual impact assessment is not accurate, nor up-to-date with current vegetation or views from surrounding properties, including recently removed vegetation and treescape to allow widening of the road immediately outside of the facility.
10. LEP table 4 page 30 “safeguarding the character and scenic landscapes of Saratoga through sensitive design of the facility.” DCP for Saratoga 6: Open Woodland Hillsides - Desired Character is not achieved. These should remain low-density residential areas where the existing scenic quality and amenity of prominent hillsides are enhanced.
11. Section 6.0, conclusion, on Page 47 states that;
 - The proposal will not result in any adverse visual impacts
 - The proposal is fittingly located within the urban context and is consistent with adjacent land uses.
12. The EME (radiation report) attached as an appendix to the report shows a 23% increase in the radiation to nearby receivers. This is a significant increase. There is no indication of the maximum wattage capacity that the tower is allowed to transmit. And the reading is at 1.5m above ground level. This does not take into account the second storey balconies, or the topography of the surrounding land. An independent analysis would be needed.

From the above points, it can clearly be seen that the proposal has not been given adequate planning, review, or analysis of more suitable solutions. It is totally out of place and scale, and totally incompatible with the surrounding residential neighbourhood.

It is imperative that Central Coast Council review the above points, and take them, and their adverse effects on the families living underneath, and nearby to this proposed over scaled tower into consideration in their decision making, whilst also considering the outcome of the precedent decision to an almost identical development application which was declined (Wyoming Optus 5G Tower).