

Director, Strategic Assessment

Department of Planning

GPO Box 39 SYDNEY NSW 2001.

15 December 2010

**RE: COAL & ALLIED SOUTHERN ESTATES PROPOSAL-MIDDLE CAMP
(MP10_0089)**

I wish to express my clear **objection** to any application to rezone conservation land in the area of Catherine Hill Bay known as Middle Camp.

Middle camp is an inappropriate site for development and is in an entirely inappropriate proximity to the infrastructure that a development of "State Significance" requires. Furthermore, the process under which this proposal will be considered should not be used until the recommendations of the ICAC report into Part 3a of the planning act are executed.

Catherine Hill Bay (Middle Camp) is not a "State Significant Site" and is not appropriate for a large scale development. Catherine Hill Bay is one of the least suitable sites for development of any in the Lower Hunter Region. The scale of the proposal and the likely housing yield are too insignificant to achieve any meaningful outcome toward the Lower Hunter Regional Strategy and would come at an enormous cost to the state financially and socially.

The process under which the Zoning is to be changed, Part 3a, is not adequately designed to safeguard against the influences of vested interests and is to too greater extent subject to ministerial discretion rather than independent oversight. This point has been supported by the most recent ICAC report. The processes that were put in place to protect small communities like Catherine Hill Bay from parties with much greater resources are the Local Environmental Plans, and this is the correct process under which this proposal must be measured. This view is supported by the local community, the Land and Environment Court and the ICAC.

The position of the two Hamlets proposed by Coal & Allied either side of Flower's Drive represent a significant incursion onto the visual catchment of the now Heritage Listed neighbourhood situated on Flowers Drive. The lots to the East of Colliery Road are easily close enough to be seen from most of the existing homes, particularly on the North Western side of Flowers Drive. These properties have views protected by the Heritage Listing. The site of the old E Pit colliery is an Archaeological site and is not suitable for residential development geologically, or socially.

Most critical is the area of the site known as Slack Alley. This is the most inappropriate site for residential development due to its proximity to wetlands, the impact on the visual catchment of the Heritage town, risk of Fire and the problems with emergency access and egress on existing roads, which are not large enough to cope with increased traffic and the homes are built too close to the roadside to consider it a major thoroughfare.

The proposal does not outline plans for the 12.38ha of land to the North West of Northwood Ave. But it clearly states an intension to retain control over it for future development. I oppose anything but the permanent conservation of this land.

Catherine Hill Bay has no services other than power, and only enough power for the current population. Any new development is a green-field site requiring all services including roads, as existing roads are not suitable to sustain the additional demand. The cost per housing lot is high as a result. This represents poor value for money.

The traffic report in the concept plan is based on research undertaken at the quietest time of the year. Its key assumptions are not based on regular average traffic flows, but sub-peak numbers. This makes the calculations in the report inaccurate and therefore must therefore be disregarded.

The planned demolition of heritage homes in the Pitt Road and Sawmill Camp area shows a lack of any regard for the significant value of these sites as they are. Demolishing these buildings cannot be permitted on the basis of their state of repair. These buildings are no less significant than those within the heritage curtilage.

The fragility of the surrounding environment would be put at further risk by this development. Increased wildlife mortality, erosion and weed infestation would be inevitable.

222 houses is not of State Significance. Middle Camp is not a suitable sustainable place for any significant housing development and in fact has much more to offer to the Hunter as conservation land. The zoning must therefore remain unchanged. I call on the minister to consider community opposition to this proposal and save Catherine Hill Bay from inappropriate development.

Yours Sincerely,