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Director, Strategic Assessments  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

**RE: Catherine Hill Bay Subdivision - Project Application (MP 10-0204)**

I object to this proposed subdivision at Catherine Hill Bay as it does not meet the Director-General's Requirements which include consideration of NSW Coastal Policy 1997, the Coastal Design Guidelines for NSW and the Independent Hearing and Assessment Panel's (IHAP) Interim and Final Reports. Nor does the Project Application fulfill the Director-General's Key Assessment Requirements.

In his letter of 9<sup>th</sup> November 2010, Bryan Rose claims that "issues relating to development of the Land have been extensively explored via the previous State Significant Site and the previous Concept Plan approval processes". However this current application is entirely unlike any previous application. It is a standard suburban subdivision which ignores the aesthetic and cultural heritage qualities of the existing village, the landscape setting and site's environmental characteristics. Further, it entirely disregards the principles established by the IHAP in their Interim and Final Reports.

A fundamental requirement for any application is that the "extensive explorations" are not only comprehensive but are directly relevant to the development proposed. The subdivision currently proposed is not only different but is significantly worse than that submitted on 13 April 2007, which was subsequently rejected by the Minister of Planning himself.

**Detailed Objections to the current proposal:**

1. It does not comply with the Government's Coastal Policy and Coastal Design Guidelines and it is not best practice coastal planning. This subdivision application proposes to clear the land of any trees and heavily modify it to produce back-to-back suburban housing lots on an area which was, until recently, intended for coastal acquisition and conservation. This is a development pattern that is more than 40 years old and cannot reasonably be considered to be sound planning practice in this sensitive location.
2. It has a negative impact on the scenic, aesthetic and cultural heritage qualities of the existing State Heritage Listed Village of Catherine Hill Bay. Development on the headland will be easily seen from any part of Catherine Hill Bay beach and will degrade the heritage values of this unique township and its setting. The retail outlets will be prominent as they are located on the ridgeline and will be within the visual catchment of the heritage village.
3. Contrary to the IHAP recommendations, it proposes unsympathetic development on the ridgelines. The Independent Panel required that the ridge lines be preserved as treed and green areas with any development set well back behind a landscaped buffer. The current application

proposes development right up to the roadway with no landscaped visual buffers along Montifiore Parkway... in fact, there is no "Parkway".

4. It lacks a clear considered design approach which responds to the environmental attributes of the site. The expert Independent Hearing and Assessment Panel required bushland corridors that linked open spaces and provided an appropriate setting for development. They referred to the development of "discreet hamlets" with individual characters. This current proposal is for an homogenous swath of suburban lots which would be totally out of scale and overwhelming in this sensitive context.

5. The proposed Development Control Plan is entirely inadequate as it lacks suitable controls to ensure appropriate development for this visually sensitive location. The proposal intends that "SEPP (Exempt and Complying Development Codes) 2009 be the primary source of development standards for residential development on the site". This is inappropriate as the Complying Codes were developed to facilitate suburban project houses which would be incompatible to the environmental character.

6. The proposal fails to provide for high quality access for the public to the beach front, open spaces, coastal walk and bicycle paths. There is no public car parking for beach access. It provides no connectivity or permeability.

7. Dropping this suburb into coastal conservation lands is plainly poor ecological management. Ecological corridors will be blocked as the Wallarah National Park is almost cut in two. The Munmorah State Conservation Area will be damaged by the intrusion of pets, feral animals and polluted runoff. Visual impacts will be detrimental on both the National Park and Conservation Area.

8. The bushfire protection strategy proposed is inadequate as it relies on individual owners to clear and maintain Asset Protection Zones. It is widely acknowledged that as the climate changes, bushfire risks will increase. This will rapidly render this development a high-risk area. As the Insurance Council of Australia warns, it may become impossible to protect such housing within the lifetime of the buildings.

9. While the project application is for a residential subdivision "to create up to 600 residential lots" many of the proposed lots are capable of further subdivision so the number of houses could increase even further.

10. This residential subdivision will be a totally car dependent. Department of Planning reports have acknowledged that Catherine Hill Bay is unsuitable for residential development as the area is remote from services, jobs and will rely on private car ownership. The increase in population will not sustain viable public transport.

11. There is no consideration given to the cumulative impacts associated with the proposed development of Middle Camp.

12. The Director-General required that consultation be undertaken with the local community. No such consultation occurred and hence the EA cannot indicate issues raised by stakeholders or potential solutions. This requirement was simply not addressed.

Signed \_\_\_\_\_