Bonny Hills Progress Association INC.

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17 December 2010

Submission: Part 3A Concept Plan (Residential, Commercial/Tourist Development and Environmental Works); and Project Application (for Stage 1 Environmental Works)

Application Name: Area 14 Stage 1B of Lake Cathie

Lot 1 DP 374315, Lot 4 DP 615261 and Part Crown Reserves (R82555 and R754444), Ocean Drive, Lake Cathie

Application Number: MP07_0010

Attention: Major Projects Assessment, Department of Planning, GPO Box 39, Sydney NSW 2001 (Contact officer: Enguang Lee)

Copy to: Administrator, Port Macquarie Hastings Council

Introduction

Bonny Hills Progress Association is a voluntary incorporated organisation whose committee is elected at an annual general meeting[1]. BHPA's primary charter is to safeguard the Vision that the Bonny Hills community has agreed for the village and surrounds – primarily upholding and enhancing the reasons why people come to live in such a locale.

Ensuring that a major development such as that proposed for Area 14 in the Port Macquarie Hastings Council region, (of which this Application is a part), complies with the State and Local Government rules and regulations, that there are not likely to be unintended consequences impacting on the community, while capitalising on the opportunities presented, is core to the BHPA charter.

As would be expected many of the issues associated with this Application are similar in nature to those associated with the Rainbow Beach, Bonny Hills Application (Application Number: MP_060085/MP07_0001) to which our Association provided a submission.

[1] BHPA operates under the Model Rules for Incorporated Associations set up under the Associations Incorporation Act, 1984, which is under the auspices of the NSW Office of Fair Trading.

Approach

The sheer volume of paperwork involved and the technical knowledge required to critique this Part 3A application in detail are such that BHPA will rely on State and Council officers to ensure that the many compliance issues are in order. It does appear however that the application and supporting documentation by the many experts at least recognise most of the issues likely to arise.

Our submission focuses heavily on the likely unintended consequences of a large increase in population. It also draws on the comments and concerns enunciated by community members at a recent community forum convened in Lake Cathie by the developers to discuss the Part 3A application.

Main points

As in the case of our submission regarding MP_060085/MP07_0001, providing a statement of support (or otherwise) from the community for this large development - as requested for submissions - is not possible and for the same reasons: The absence of real detail about what this development will actually look like at concept stage and what can actually be realised given the developer's reluctance and the Council's and State Government's reluctance and/or inability to pay for supporting infrastructure and services means that the community would be signing a blank cheque if it were to offer unqualified support.

When asked for more information at the community forum the developers were not able to provide detail about:

- the actual types of housing that would be built adjacent to the Hilltop village and in the surrounding suburbs
- the design of the village and nature of businesses that it would contain
- adequacy of junctions with, and improvements required to the adjacent arterial road, Ocean Drive, for the expected increase in traffic loads
- road and track connectivity between this development and MP_060085/MP07_0001 and likely traffic flows

Again the devil will be in the detail and the detail is not available at this concept stage.
In short, housing for more people is being provided, (the standard and type of which are not known), and there is no confidence that the supporting infrastructure and services, which are already judged to be substandard for the existing population, will be adequately catered for.

So while there should be upsides, such as short term employment opportunities during the development phase, and longer term advantages that a greater critical mass might bring in the forms of demand for improved services, views about this potential are countered by unanswered concerns regarding the likely downsides in the eyes of the community.

Specifics concerns are set out as follows:

1. The parlous state of local and State government finances is of overriding concern as existing infrastructure and services are deemed to be inadequate for the current population let alone the projected doubling of population via Area 14. It is more than apparent that the developers will only provide what they are obliged to, and so even with Section 94 contributions the shortfall will be large across the range of infrastructure and services needed.

2. Ocean Drive, the arterial route going past the development is already in an abysmal state to handle the current volume and variety of traffic – on Council's reckoning equivalent in numbers of vehicle trips to that on the adjacent Pacific Highway. Additional traffic flow onto and along this road through the main streets of villages to the north and south is untenable without major upgrades and diversions. There is no apparent provision for this in the short section adjacent to the development let alone along the length of this Drive. Similarly the

main route to the Pacific Highway, Houston Mitchell Drive, is inadequate to handle the likely increased traffic loads.

Additionally there are real concerns regarding the suggestion that the four junctions on Ocean Drive adjacent to Area 14 may be set up with traffic lights. If this were to occur there would be an untenable disruption to the flow of through traffic over such a short distance. Well designed roundabouts will be the only way to enhance traffic flows.

3. Housing or development that is not consistent with the existing heights and densities in adjacent villages: the proposed building heights will not succeed in maintaining the village atmosphere as claimed in the Environmental Assessment (page 178). Three to four story housing is proposed for the medium density housing alongside the Hill-Top village which is to be located on the highest ridge in the development. Clearly this will be the most visible location from the surrounding areas and the beach – something that no one wants. The community is strongly opposed to this type of development.

4. The location of this development adjacent to a narrow band of sensitive littoral rainforest and coastline, and in part of the Duchess Creek catchment provides for a particularly delicate balancing act. The Project Application for the 'Stage 1' environmental works associated with the SEPP 26 Littoral Rainforest appears sound, as does the Vegetation Management Plan. It will be critical to get these right if the rainforest is to have any chance of maintaining its integrity.

   While the proponents appear to recognise the sensitivities, the adequacy of their suggested safeguards and buffer distances warrant particular attention by the environmental regulators. The best of intentions in the short term can be eroded with the passing of time, and as more pressure comes onto the system with population build up. Longer term monitoring processes and accountabilities will be needed by Council to ensure slippage does not occur. Whether the buffer distances are adequate – SEPP 26 indicates 100m – and possible impacts of any development within this distance, such as wind turbulence need to be ascertained by independent experts.

5. It is not clear whether the connectivity of this development to existing developments and the proposed MP_060085/MP07_0001 development will encourage more traffic to flow through to the coastline and the proposed beach access. It appears likely that it will in which case the adequacy of planned beachside parking and of the proposed protections and barriers for the beach access and adjacent sand hills need to be ascertained. Further it would be sensible if proposed walkways and cycle-ways provided potential for linking with the proposed coastal walk from Laurieton to Port Macquarie.

6. It is also worth noting that there are some potential safety issues. This part of the beach is rather dangerous and not really suitable for swimming. In addition 4WD beach access is currently provided just north of the proposed board walk at Middle Rock and as a general rule 4WD vehicles and people on beaches are not a good mix.

We trust these views will assist in guiding your final decision and thank you for the opportunity to provide a submission.

Yours sincerely

Roger Barlow
President

Phil Hafey
Secretary