

Dear Stephen Davies  
Heritage Council of New South Wales  
Locked Bag 5020  
PARRAMATTA, NSW 212

28 March 2017

**Re: PUBLIC NOTICE HERITAGE ACT, 1977 S60 APPLICATION - Coal River Precinct (NSW State Heritage List Register 1674).**

I would like to comment on the recently exhibited S60 Application for Coal River Precinct (1674).

The report does not address adequately the impact that the proposed new development will have on heritage values at the CRP.

Firstly, the report implies there is a Conservation Management Plan (CMP) for the CRP, this is not the case and ideally one should have been prepared prior to any development proposal.

Secondly, although the applicants Heritage Report is very detailed it does not factor in the significant heritage items within the CRP, the report does not contain reference to the direct impacts of the race circuit on Macquarie Pier or Barrallier camp in 1801 at the base of Fort Scratchley (formerly known as Colliers Point) where there are likely to be archaeological relics. These individual heritage sites should be extensively assessed in terms of impact before any decision is made to approve the S. 60. Basically the applicant's heritage report neglects to properly assess the full impact of the proposal on heritage values.

Thirdly, the University of Newcastle's Hunter (Living) Histories Initiative has undertaken extensive research of the CRP since 2004, and prepared several national nomination. The recently revised National Nomination was submitted in February 2017 and sets out the values associated with the historic site. This is currently before the Federal Minister of Energy and the Environment. The Newcastle Council, National Trust of Australia (NSW) and other groups support National listing and it would appear at odds with this current proposal to develop the heritage precinct- that national values are not considered. I urge OEH to consider all heritage values associated with the CRP and not make a decision in haste because of deadlines that the applicants has set.

Thirdly, there is a lack of detail about interpretative design that reflects the rich heritage values of the area.

Finally, the CRP is an area that have been safeguarded for decades by the community and heritage warriors that understand the significance of what is at stake here- it is a complex site that has strong associations with mining, maritime and military themes. It is a single environment representing early construction, engineering and surveying techniques. A new widened road and circuit within the CRP does not contribute the cultural landscape that is highly used for general recreation – vehicular traffic should be deterred from this precinct, not encouraged. A 'race circuit' in the CRP dramatically changes the ambience, the beach character use of the area.

## Recommendations

1. Reject Application - I am very concerned that the S. 60 Application does not take into full consideration heritage values of the site and I urge the Heritage Council of NSW not to approve the current application.
2. Further heritage assessment is needed prior to any S.60 Approval to investigate further impacts to heritage at Macquarie Pier & at base of Fort Scratchley) these have not been adequately considered.
3. Landscape Design and Interpretative elements are not provided in any detail in the applicants reports.
4. A Conservation Management Plan (CMP) be prepared, this policy document would then guide appropriate use within the CRP.

Yours sincerely,

Dr Ann Hardy (App. Her. Studies Curtin Uni)

## **Sources**

Coal River Precinct Nomination <https://hunterlivinghistories.com/2017/02/20/crp-seeks/>

Macquarie Pier <https://hunterlivinghistories.com/?s=macquarie+pier>

Fryer, Emeritus Professor John. Where Did Ensign Barrallier camp in 1801? A Report for the Coal River Working Party. [28 February 2008]

<https://downloads.newcastle.edu.au/library/cultural%20collections/pdf/fryer-barrallier-feb2008.pdf>