

Ref: SSD-83294209)

30 October 2025

Lucinda Craig

Senior Planning Officer – Social and Diverse Housing Assessments

Development Assessment and Infrastructure | Department of Planning, Housing and Infrastructure

Dear Lucinda

City of Coffs Harbour Submission to SSD-83294209 - 211A – 215 Harbour Drive, Coffs Harbour - In-fill Affordable Housing development

I refer to the request for comments from the City of Coffs Harbour Council (City) in response to above application.

The City adopted an Affordable Housing Strategy in June 2024. Any development for the purpose of in-fill affordable housing should be consistent with the aims and objectives of this Strategy.

The City has reviewed the application and accompanying documents and makes the following recommendations and comments that the City recommends should be addressed as part of the assessment process:

1. Access from Harbour Drive

The application proposed vehicular access from Harbour Drive. The City has provided the applicant with advice previously that access from Harbour Drive is not acceptable and is not supported due to the likely impact on Harbour Drive and the surrounding local road network. It is the City's recommendation that the proposal be amended to relocate the vehicular access to North Street.

2. Bus Stop

The application proposes to relocate/modify the existing bus stop located on Harbour Drive adjacent to the site. Any proposed relocation works will require approval from the City's Traffic Forum and must demonstrate compliance with the Disability Discrimination Act (DDA) and other relevant legislation or standards.

3. Sewer

The City's sewer network traverses the property and conflicts with the proposed building footprint. Any development is required to comply with the City's *Construction in Vicinity & Protection of Council Underground Asset Policy & Procedure*. Relocation of the main should be explored in the first instance however if this is not possible (due to grades etc.) the infrastructure will be required to be reconstructed in HDPE.

It is the City's recommendation that details demonstrating compliance with the Policy and Procedure and Clause 7.11 of the Coffs Harbour Local Environmental Plan 2013 (CHLEP) be provided before any determination of the application is made.

4. Stormwater

The stormwater management plan for the proposal must comply with the City's Water Management Requirements provided in Section D3.19 of the Development Control Plan and the Water Sensitive Urban Design Guidelines provided within the City's Technical Specification for Infrastructure Design.

The existing stormwater network on Harbour Drive will be required to be extended to facilitate a discharge point for the development in accordance with the City's Technical Specification for Infrastructure Design.

It is the City's recommendation that details of the stormwater management works including the required extension be provided that demonstrates compliance with Clause 7.11 of the CHLEP be provided before any determination of the application is made.

5. Substation

The proposed substation located along Harbour Drive frontage is considered to be unsightly and create an unreasonable visual and streetscape impact.

The City recommends the substation be relocated to a suitable location elsewhere on the site as to not impact on the streetscape. If this is not achievable it is recommended that it is setback from the street and landscaped or screened to minimise visual impacts.

6. Operational Management Plan

If the application is to be approved, the City recommends that an appropriate Operational Management Plan (OMP) is prepared, implemented and provided to the City for its records. The OMP should include but not be limited to the following:

- Management of the premises by an appointed manager/s who resides on the premises and will be contactable 7 days per week for 24/7.
- The manager will be able to respond within short timeframes and be responsible for contracts and contacts with maintenance persons and companies, manage the facilities for the recording and storing of CCTV footage, and have established relationships/contacts with security companies and services such as the NSW Police Force, NSW Ambulance Service and NSW Fire Brigade.
- Maintain an incident register and record any complaints. The register is to be made available to Council.
- Measures to promptly address and respond to tenant issues and building operation and maintenance matters.
- Provide the tenant with a copy of the Resident Information Package including Rules with any new tenancy agreement.

7. On-site manager

Given the scale and size of the proposed building, the City recommends that provision be made for an on-site managers residence to support and manage the operation of the building.

8. Laneway Access

The City acknowledges that no pedestrian or vehicular access is proposed onto the adjoining laneway to the north of the site and recommends that all access be onto North Street or Harbour Drive (pedestrian only).

9. Car Parking

The City would encourage the provision of additional car parking spaces being provided on site. However, no objection is raised to the car parking provision noting the provision of on-site parking exceeds the car parking rates set out in the State Environmental Planning Policy (Housing) 2021 and the City's Affordable Housing Strategy.

10. Waste management

A three stream waste separation system is to be provided to cater for all waste generated by the development with the number and type of bins being provided in accordance with Part F6.1 of the Coffs harbour Development Control Plan (CHDCP).

The plans accompanying the application indicate that no path is provided for the servicing of waste storage bins on site. A dedicated pathway should be provided to facilitate servicing of the waste storage area.

The proposed loading zone for waste removal must not be located within the bus zone area.

The Heavy Rigid Vehicle loading zone space is not sufficient for bulky goods collections as this requires 2 vehicles and therefore an alternative location or design is required.

In terms of operational management, the Operational Waste Management Plan suggests 'communal waste cupboard' is not serviced by a waste collection contractor. This is not acceptable, drivers will be required to service both areas (ie all of the waste stream) at the time of servicing. Access to both areas will be required for the City's contractor. Additionally, Bulky Waste will not be serviced by the City's contractor direct from the waste room. Arrangements will need to be made by the Building Manager to relocate items for kerbside collection prior to collection vehicles arrival.

It is also noted that a Section 88b instrument for the waste collection service will be required for this property and entry fobs or keys will be required for the City's Collection contractor.

For further information please contact Matt Kelly on 6648 4678.

Regards



Luke Perry
Group Leader Sustainable Places