

## Statement of Heritage Impact

### Coffs Harbour Cultural and Civic Space

19A-21 Gordon Street, Coffs Harbour 2450 NSW

Coffs Harbour City Council LGA

Prepared for GeoLINK

Prepared by Niche Environment and Heritage | 16 July 2019



## Document control

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Cover image: 19A-21 Gordon Street (Niche, 2019)

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## Executive Summary

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### **Project Outline**

Niche Environment and Heritage Pty Ltd was commissioned by GeoLINK Environmental Management and Design, to prepare a Statement of Heritage Impact, for the proposed Coffs Harbour Cultural and Civic Space redevelopment, known as All Welcome, at 23-31 Gordon Street, Coffs Harbour.

The aim of this Statement of Heritage Impact is to assess the potential heritage impacts of the proposal on 19A-21 Gordon Street, Coffs Harbour, which is located in the vicinity.

It is noted that 19A-21 Gordon Street is not listed as a heritage item. However, it was recommended for listing as a heritage item in the Coffs Harbour Heritage Study 2015, prepared by Coffs Harbour City Council.

### **Conclusion and Recommendations**

The scope of this SoHI is limited to the potential heritage impacts of the proposal on 19A-21 Gordon Street, Coffs Harbour.

On the basis of the findings of this SoHI, 19A-21 Gordon Street, Coffs Harbour, has limited heritage significance as determined by reference to the standard NSW significance assessment criteria.

No further heritage assessment of 19A-21 Gordon Street is required.

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## 1. Introduction

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### 1.1 Project background and aims

Niche Environment and Heritage Pty Ltd (Niche) was commissioned by GeoLINK Environmental Management and Design (GeoLINK), to prepare a Statement of Heritage Impact (SoHI) for the proposed Coffs Harbour Cultural and Civic Space redevelopment, at 23-31 Gordon Street, Coffs Harbour.

The aim of this SoHI is to assess the potential heritage impacts of the proposal on 19A-21 Gordon Street, Coffs Harbour, which is located in the vicinity, south of the project area.

It is noted that 19A-21 Gordon Street is not listed as a heritage item. However, it was recommended for listing as a heritage item in the Coffs Harbour Heritage Study 2015, prepared by Coffs Harbour City Council.

### 1.2 Subject Area location

The subject area is 19A-21 Gordon Street, Coffs Harbour, located in close proximity to Coffs Harbour Central Business District (CBD), within the Coffs Harbour City Council local government area (LGA).

The location and extent of the subject area is shown in Figure 1 and Figure 2.

### 1.3 Proposed development

The proposed development at 23-31 Gordon Street would involve the construction of a new library/gallery development in Gordon Street. The existing buildings at 19A-21 Gordon Street, Coffs Harbour, would be retained.

This report is based on available information contained in the All Welcome Coffs Harbour Cultural and Civic Space, Schematic Design, June 2019, prepared by BVN Architecture. No drawings have been provided for assessment in the preparation of this report.

The proposal is described in detail in Section 6.

### 1.4 Methodology

This SoHI has been prepared in accordance with the principles and methodology contained in The Burra Charter: The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance, 2013 (Burra Charter); and the heritage guidelines produced by the NSW Office of Environment and Heritage (Section 9).

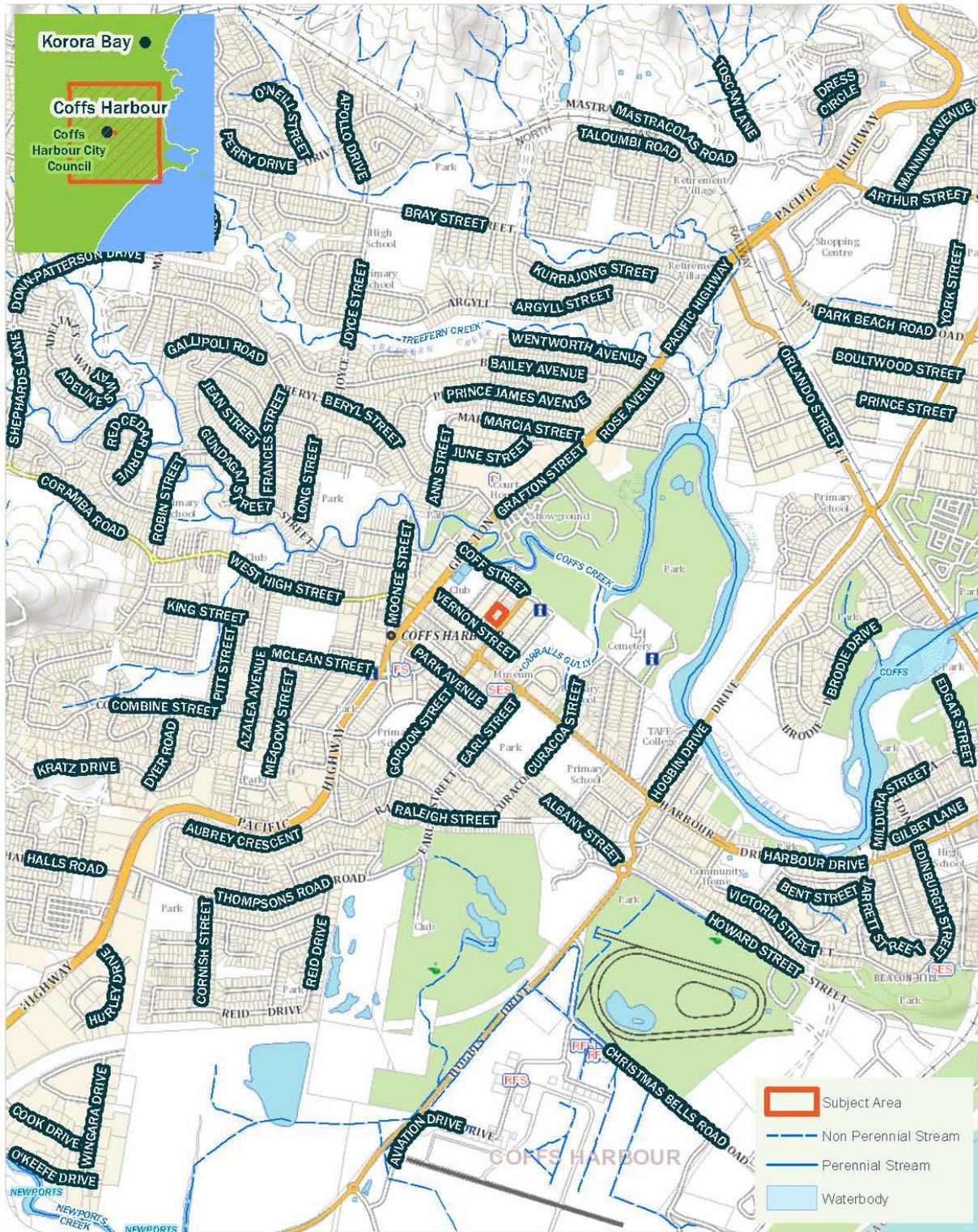
### 1.5 Authorship and acknowledgements

This report has been prepared by Liliana Duran, Senior Built Heritage Consultant, and has been reviewed by Joshua Madden, Team Leader Historic Heritage, of Niche Environment and Heritage.

We thank the following individuals for their assistance in the preparation of this report.

- Simon Waterworth, Director, GeoLINK.

Figure 1 Location of the Subject Area (Source: LPI and Niche)



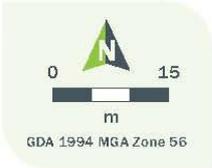
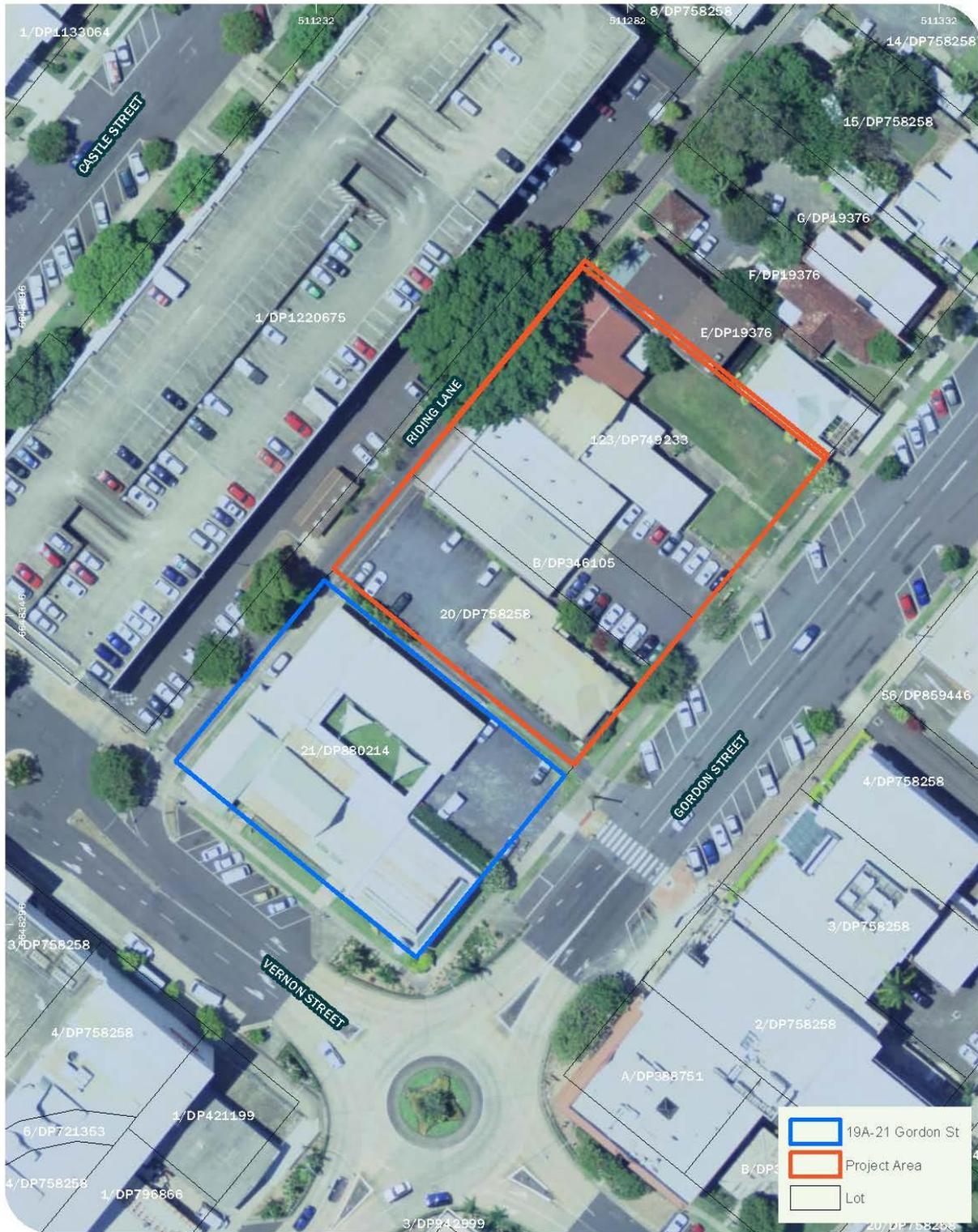
GDA 1994 MGA Zone 56

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Client: GeoLINK

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**Figure 1**

Figure 2 Project Area and 19A-21 Gordon Street (Lot E DP 346105) to the south (Source: LPI and Niche)



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Figure 2

## 2. Regulatory and Assessment Framework

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### 2.1 Preamble

This section provides a summary of relevant legislation and associated planning instruments designed to protect and conserve significant heritage items and their values.

### 2.2 Commonwealth and National legislation

#### 2.2.1 Environment Protection and Biodiversity Conservation Act 1999

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the Australian Government's central piece of environmental legislation. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places. Under the EPBC Act, protected heritage items of significance are listed on the National Heritage List (NHL) or the Commonwealth Heritage List (CHL). The NHL provides protection to places of cultural significance to the nation of Australia, while the CHL comprises natural, Aboriginal and historic heritage places owned and controlled by the Commonwealth.

### 2.3 State legislation

#### 2.3.1 Heritage Act 1977

The Heritage Act 1977 affords statutory protection to those items identified as having heritage significance and which form part of the NSW heritage record. The Act defines a heritage item as “a place, building, work, relic, moveable object or precinct”. Items that are assessed as having State heritage significance are listed on the NSW State Heritage Register (SHR). Proposals to alter, damage, move or destroy heritage items listed on the SHR (or protected by an Interim Heritage Order [IHO]), require an approval under s60 of the Heritage Act 1977.

Archaeological features and deposits are afforded statutory protection by the ‘relics provisions’ of the Act. A relic is defined as “any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement, and is of State or local heritage significance”. Land disturbance or excavation that will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed is prohibited under the provisions of the Act, unless carried out in accordance with a permit issued under s140 or s139 of the Act.

#### 2.3.2 Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning process in NSW. The EP&A Act also requires local governments to prepare planning instruments, such as Local Environmental Plans to provide guidance on the level of environmental assessment required.

#### 2.3.3 State Environmental Planning Policy (SEPP)

State Environmental Planning Policies or SEPP's are environmental planning instruments that deal with matters of State or Regional environmental planning significance. The effect of a SEPP is that it can override a LEP and can prohibit certain types of development or can allow development in a certain zone. In the case of this project the development will be submitted under the State Environmental Planning Policy (State and Regional Development) (2011) Schedule 1 State significant development—general (13).

### **2.3.4 Local government planning instruments**

#### **Local Environmental Plan**

The Environmental Planning and Assessment Act 1979 (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the land use planning process in NSW. The EP&A Act also requires local governments to prepare planning instruments, such as Local Environmental Plans to provide guidance on the level of environmental assessment required.

Heritage portions of the LEP are found in Part 5 Clause 5.10 of each LGA LEP.

### **2.3.5 Historical heritage listings**

The historic heritage places, relics and items are listed on both statutory and non-statutory registers. Depending upon the significance level ascribed heritage items are held at federal, State and local levels.

The federal heritage designations are maintained by the Commonwealth Department of Environment and include the Commonwealth Heritage List and the non-statutory National Heritage List. These lists can be searched online via the Australian Heritage Database. Historic heritage items of state significance are found on the NSW State Heritage Register (SHR) and made available on the NSW Heritage Inventory. Places of local significance are included in Local Environmental Plans. It is noted that 19A-21 Gordon Street, Coffs Harbour, is not listed as a heritage item.

## 3. Historical Context

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### 3.1 Preamble

This section has been produced from a review of previous detailed assessment work undertaken for the proposed library/gallery re-development at 23-31 Gordon Street, Coffs Harbour as follows.

Coffs Harbour Cultural and Civic Space, 33 Gordon Street, Coffs Harbour, Statement of Heritage Impact, June 2019 (draft), prepared by Niche Environment and Heritage.

Coffs Harbour Cultural and Civic Space, 23 Gordon Street, Coffs Harbour, Statement of Heritage Impact, June 2019 (draft), prepared by Niche Environment and Heritage.

Coffs Harbour Cultural and Civic Centre, Historical Heritage Constraints Assessment, May 2019, prepared by Niche Environment and Heritage.

Coffs Harbour Heritage Study, 2015, prepared by Coffs Harbour City Council.

### 3.2 Early settlement of Coffs Harbour

Coffs Harbour takes its name from John Korff (1799-1870) who was an early settler and shipbuilder who emigrated to NSW in 1835. While the events surrounding Korff's 'discovery' of the location which became known as Coffs Harbour are ambiguous, after Korff's visit the *NSW Government Gazette* harbour in December 1861 declared reserve 15 at the area which is now Coffs Harbour (CHHS, 2015, p10).

The early settlers of Coffs Harbour were predominately selectors who engaged in the lucrative pursuit of cedar for logging. The trees were roughly milled on site, and then floated out to waiting ships using the tidal estuary of Coffs Creek. Bongil Creek was also used and the town of Sawtell was settled at same time (CHHS, 2015: p11).

After the initial period of cedar harvesting, lands cleared by this process were gradually turned over to farming as supplies of cedar were exhausted. Coffs Harbour was still an isolated fledgling community reliant on sporadic visits by coastal trading vessels (CHHS, 2015: p15).

Settlement of Coffs Harbour was intensified by the discovery of Gold in 1881 in the Orara Valley, north-west of Coffs Harbour (CHHS, 2015: p14). While the gold rush which followed did not develop a lasting industry it stimulated the construction of infrastructure and services, and created an influx of people into the region, some of whom stayed and settled when the gold ran out.

### 3.3 Regional development of Coffs Harbour

As the early period of development at Coffs Harbour was drawing to a close, the economic impetus of the region was sustained by new industries and infrastructure projects. The associated building, clearing and settling as a result has shaped the landscape of the region. This period of development has continued to the present, as the differing priorities of the last century have left their mark.

One of the early replacements for Cedar-getting in the region was Dairy farming. As settlers logged all the viable timber on their selections they were often looking for new ways to produce income from the land, and due to the requirement for bullocks to move logged timber, cows for dairying were easy to acquire. The introduction of mechanised equipment for processing milk to NSW in 1884 revolutionised the industry, allowing transport of derivative products such as cream and butter to new markets further afield (CHHS, 2015: p17). The development of cooperatives (such as the Orara Dairy Farmers Cooperative Society, founded

1897 (CHHS, 2015: p18)) for collective distribution and marketing also increased the value and sustainability of this industry. As a result the dairy industry had considerable influence throughout Coffs Harbour's history.

The move from short-term industries to more sustainable land use developed as a result of increased ease of transportation allowing for greater export capabilities of produce, particularly sugar and bananas. Sugar was one of the earliest crops attempted in the Coffs region, and was successful on a small scale. The lack of a jetty and the fluctuating price of sugar in the 1880s meant that this crop was not commercially viable in the region (CHHS, 2015: p16).

The production of bananas for export was far more successful. Early production began in the 1880s, but was still a small industry by the time of the First World War. In the inter-war period, banana growing had become firmly established. By the end of the Second World War production had increased significantly with the region known for its banana farming. By the latter half of the 20<sup>th</sup> Century the industry had retracted with the repurposing of agricultural land for urban growth and tourism.

One industry which was a staple of the region in the pre-WWII period was Hardwood timber production. Although less profitable than the early Cedar-getting, the construction of the Coffs Harbour jetty and advancements in the local milling processes helped to make this industry economically viable. The industry also benefitted from the development of the Coffs regions with local hardwood utilised as a building material. The companies involved set up tram lines between Coffs Harbour Jetty and sawmills located near to the logging camps, and Coffs Harbour had several tram lines for the transfer of timber for export. When the railway was built, these some of these lines were lifted up, while others were incorporated into sidings of the railway infrastructure. The timber export industry in the Coffs region operated from the 1890s through to the period leading up to WWI, as timber stocks became depleted. It however was a major influence on growth and was a sustaining factor of Coffs Harbour's early development (CHHS, 2015: pp20-22).

### **3.4 The Coffs Harbour port facilities**

The need to upgrade the arrangement for the loading of ships anchored off Coffs Harbour from small boats to a fixed structure was acknowledged early in Coffs Harbour's history. The construction of the jetty was begun in 1890 and completed in 1892. The jetty incorporated a narrow gauge train line along its 1641 feet length and a steam-powered crane at the seaward end (CHHS, 2015: p19). The jetty infrastructure underwent a series of modifications as the needs and capacity requirements changed.

The other major upgrade to the harbour facilities was the creation of breakwaters and sea walls linking the small islands off the coast to create a protected basin for shipping. This endeavour began in 1913 and work was completed in 1924. Later upgrades to the break wall were completed 1935, when the work was finalised and concrete stabilisation had been completed. While the development of the jetty and the surrounding breakwater did not provide immediate economic stimulus they facilitated regional trade and unlocked the potential for many businesses to exist (CHHS, 2015: pp24-25).

### **3.5 Regional rail**

Like the port facilities, the building of the North Coast Railway through the Coffs region brought many opportunities for growth to the community. The rail line was considered as early as 1903 by the NSW parliament. With the finalisation of the rail line route construction began in 1911 with the line completed in 1922. A settlement known as Coffs Heights served the workers who were engaged in the building of the steep section of track which lead up to Red Hill, located six kilometres from Coffs Harbour. A branch line was also constructed between 1914 and 1924, which lead from Glenreagh to Dorrigo. In 1975 the lack of economic viability caused this line to be closed (CHHS, 2015: p22-24).

### **3.6 Coffs Harbour development**

Steady population growth throughout the late 19<sup>th</sup> Century and 20<sup>th</sup> Century facilitated the development of public and communal structures.

Many church buildings were erected, and these were generally built using the prevalent hardwood out of timber in a simplified 'carpenters gothic' style (CHHS, 2015: p37). These were built in large numbers from the 1880s onwards during the early development of Coffs Harbour, with many different Christian denominations represented. While the churches who used them varied, the buildings were similar in style and method of construction, and form a recognisable type. Surviving examples are evident throughout the region providing an understanding of the early settlement of the northern NSW coast (CHHS, 2015: p37).

From 1900, a number of community halls were constructed throughout the region, serving as venues for events, meetings and acting as social centres of their surrounding districts (CHHS, 2015: p38).

Private dwellings became more sophisticated as the region developed, and as access to materials became less difficult. Early dwellings were constructed out of available materials however, an element of temporary or shanty housing remained up to the post-WWII period. Before WWI, residences were primarily constructed of timber, with few examples of decorative features requiring imported materials. Inter-war housing utilised additional materials such as fibro, weatherboard, brick and a combination there-of. As a result, decorative features became a pattern of construction of this period (CHHS, 2015: pp42-43).

### **3.7 Impacts of the World Wars**

The First World War (1914-1918) created an economic impact for industry in the Coffs region, as trade was restricted, and large groups of young men enlisted. At the end of the war, the returned soldiers' movement played a role in the early 20<sup>th</sup> Century population growth in the region, with some returned soldiers resettled in Coffs Harbour (CHHS, 2015: p41).

The Second World War (1939-1945) had a far larger impact on Coffs Harbour. As a midway point between Sydney and Brisbane Coffs was used in a strategic role for coastal surveillance and as a supply base, (CHHS, 2015: p47). There was a large amount of military infrastructure, bases and defensive arrangements built during this period, with the expansion and modernising of the aerodrome one of the longer lasting examples. This remains as Coffs Harbour Airport today and has facilitated the growth of tourism in the region.

The years after WWII saw the growth of many industries, and the reduction of many of the earlier industries that played a role in the earlier development of the region. The war development allowed for regular air services, and tourism in the region benefitted as a result. In the post war era there was a drop in butter production, as smaller dairy farms were incorporated into the urban limits of Coffs Harbour. Banana production, already substantial pre-war, became the region's signature agricultural crop. There was an increase in the commercial development in the Coffs Harbour city centre, and during this time Coffs saw the settlement of several migrant communities, such as the Dutch in Coffs Harbour and the Sikh in Woolgoolga. Larger building projects were also completed during this time, using diverse materials available after the war.

### **3.8 Gordon Street**

The Government Surveyor, H A Evans laid out a town plan for a new village at present-day Coffs Harbour in 1886. He acted under instructions from the District Surveyor, William Braylesford Greaves, after whom it appears Evans wished to name the new town. When the plan was published in the Government Gazette in 1886, the town's name appeared as Brelsford. By this time, the fledgling settlement was informally known as Coffs Harbour and the official name of Brelsford was dropped in 1897. The first sales of land were held in Kempsey on 8 February 1888 when 20 half-acre lots were offered, bounded by High, Albany, Gordon and Earl Streets.

## 4. Physical Description

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### 4.1 The Setting

The site is located in close proximity to Coffs Harbour CBD. The immediate area surrounding the site bounded by Coffs Street to the north, Gordon Street to the east, Vernon Street to the south, and Castle Street to the west, is generally characterised by mixed development over several construction periods, and a mixed subdivision pattern. These are predominantly commercial uses, including recent development. A pedestrian lane provides mid-block connection between Coffs Street and Vernon Street. A five-storey public carpark is located to the west.

### 4.2 19A-21 Gordon Street, Coffs Harbour

The site located at 19A-21 Gordon Street, Coffs Harbour, comprises the Uniting Church and Church Hall group, including c.1920s single-storey weatherboard buildings, adjacent Riding Lane, late twentieth century (c.1970s) single and two storey buildings, adjacent Gordon Street, and an open carpark, with access from Gordon Street.

Plates 1 to 4 below show the existing layout and buildings.



**Plate 1 Uniting Church and Church Hall. Exterior view from the carpark.**



**Plate 2 Uniting Church and Church Hall. Exterior view from Gordon Street.**



**Plate 3 Uniting Church and Church Hall. Exterior view from Vernon Street. Riding Lane to the left.**



**Plate 4 Uniting Church and Church Hall. Exterior view from the carpark.**

## 5. Heritage Significance

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### 5.1 Assessment Criteria

This assessment of significance uses the NSW standard heritage assessment criteria contained in the guidelines produced by the NSW Heritage Office, *Assessing Heritage Significance, 2001* (a NSW Heritage Manual Update).

These standard NSW heritage assessment criteria encompass the range of values in the Burra Charter. These are aesthetic, historic, scientific, social or spiritual value, for past, present or future generations.

It is noted that a place will be considered to be of State or local heritage significance, if it meets one or more of the standard NSW standard heritage assessment criteria.

### 5.2 Assessment of Significance of 19A-21 Gordon Street, Coffs Harbour

#### Criterion (a)

- An item is important in the course, or pattern, of NSW's cultural or natural history (State significance); or
- An item is important in the course, or pattern, of the local area's cultural or natural history (local significance) (local significance).

The 1918-1945 period was the second major building phase in the growth and development of Coffs Harbour, with priority given to the construction of simple, small scale homes and community buildings, to serve the growing population, over other types of buildings. The site at 19A-21 Gordon Street has some value when viewed as a group, demonstrating the historical development of Coffs Harbour and the continued use by the Uniting Church for at least 50 years. However, it is a modified, relocated example. Hence, it is not considered a good example to illustrate a significant historical phase or activity under this criterion.

#### Criterion (b)

- An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW'S cultural or natural history (State significance); or
- An item has strong or special association with the life or works of a person, or group of persons, of importance in the cultural or natural history of the local area (local significance).

No significant connections or events of historical importance to the understanding of the local area have been identified in the preparation of this study.

#### Criterion (c)

- An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (State significance); or
- An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area (local significance).

The site is not a major work by an important designer nor a good example of a particular style.

#### **Criterion (d)**

- An item has a strong or special association with a particular community or cultural group in NSW for social, cultural or spiritual reasons (State significance); or
- An item has a strong or special association with a particular community or cultural group in the area for social, cultural or spiritual reasons (local significance).

An assessment of social significance has not been undertaken for the preparation of this report. However, the site has been in use by the Uniting Church for at least 50 years. In this regard, it may have some significance to the local community. No other significant contemporary community associations have been identified in the preparation of this study.

#### **Criterion (e)**

- An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (State significance); or
- An item has potential to yield information that will contribute to an understanding of the area's cultural or natural history (local significance).

No areas of historical archaeological potential were identified within the proposed library/gallery project area in the Historical Heritage Constraints Assessment prepared by Niche.

#### **Criterion (f)**

- An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (State significance); or
- An item possesses uncommon, rare or endangered aspects of the area's cultural or natural history (State significance).

The site is not a rare example of its type.

#### **Criterion (g)**

- An item is important in demonstrating the principal characteristics of a class of NSW's
  - Cultural or natural places; or
  - Cultural or natural environments (State significance); or
- An item is important in demonstrating the principal characteristics of a class of the area's
  - Cultural or natural places; or
  - Cultural or natural environments (local significance).

The site is not a good representative example of its type.

### **5.3 Summary Statement of Significance**

A number of sites were recommended for listing as a heritage item in the Coffs Harbour Heritage Study 2015, including 19A-21 Gordon Street, Coffs Harbour. The recommendation in the Coffs Harbour Heritage Study 2015 refers to a “Methodist church (former – original) built in 1920s, moved back to become part of hall”.

On the basis of the findings of this SoHI, the site at 19A-21 Gordon Street has some value when viewed as a group, demonstrating the historical development of Coffs Harbour and the continued use by the Uniting Church for at least 50 years. In this regard, it may have some significance to the local community. However, it is a modified, relocated example.

Overall, the site has limited heritage significance as determined by reference to the standard NSW significance assessment criteria.

## 6. Proposed Works

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### 6.1 Project Background

In 2016 Coffs Harbour City Council established a Planning Advisory Group and a Council project team with the aim of facilitating research for the development of library/gallery facilities in Coffs Harbour. As a result, the project team recommended 23-31 Gordon Street, Coffs Harbour, as being the most suitable site for further concept planning.

New development in Coffs Harbour is to comply with the principles contained the Coffs Harbour City Centre Master Plan and Coffs Harbour Development Control Plan 2015, Part G Special Areas Controls, G3 Coffs Harbour City Core Precinct.

### 6.2 Proposed Works

This report is based on available information contained in the All Welcome Coffs Harbour Cultural and Civic Space, Schematic Design, June 2019, prepared by BVN Architecture. No drawings have been provided for assessment in the preparation of this report.

The proposed development at 23-31 Gordon Street would involve the construction of a new library/gallery development in Gordon Street.

The proposed Coffs Harbour Cultural and Civic Space redevelopment, is an approximately 13,500m<sup>2</sup> multi-use facility, containing a Public Library, Art Gallery, Museum, Council Customer Service Centre, Public Space and Meeting Rooms, Council Chambers, Council Administration Offices and Car Parking. The project, known as All Welcome, seeks to create new cultural and civic facilities in support of the growth of the LGA.

The existing buildings at 19A-21 Gordon Street, Coffs Harbour, would be retained.

## 7. Heritage Impact Assessment

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### 7.1 Preamble

This section provides the assessment of the potential heritage impacts of the proposed Coffs Harbour Cultural and Civic Space redevelopment, on 19A-21 Gordon Street, Coffs Harbour.

This assessment of heritage impacts addresses the following matters

- why the item is of heritage significance (Section 5);
- what impact the proposed works would have on that significance (Section 7); and
- what measures are proposed or recommended, to mitigate any potential negative impacts (Section 8).

### 7.2 Assessment of Heritage Impacts

On the basis of the findings of this SoHI, 19A-21 Gordon Street, Coffs Harbour, has limited heritage significance as determined by reference to the standard NSW significance assessment criteria.

The positive aspects of the proposal are summarised below.

- The proposal seeks to create a distinctive place suited to its location in the Coffs Harbour CBD.
- The design intent for the building is to develop a porous architectural form to facilitate visual and physical connections with the precinct and CBD.
- The proposal seeks to implement low embodied energy construction systems and materials, appropriate for the building type, that respond to the unique environmental conditions of Coffs Harbour
- There is a focus on improving pedestrian connectivity and activation in the precinct.
- The maximum height limit on the site is approximately eight storeys. The buildings adjacent to the site are generally single and two-storey buildings containing commercial functions, with larger commercial buildings at either end of Gordon Street. The largest buildings in the area, Coffs Central Shopping Mall and Castle Street Car Park are located in the vicinity. There is potential to open up views out to the nearby parklands.

## 8. Conclusions and Recommendations

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### 8.1 Conclusion and Recommendations

The scope of this SoHI is limited to the potential heritage impacts of the proposal on 19A-21 Gordon Street, Coffs Harbour.

On the basis of the findings of this SoHI, 19A-21 Gordon Street, Coffs Harbour, has limited heritage significance as determined by reference to the standard NSW significance assessment criteria.

No further heritage assessment of 19A-21 Gordon Street is required.

## 9. References

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