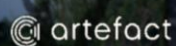


211A-215 Harbour Drive, Coffs Harbour

Statement of Heritage Impact and Archaeological Assessment Report

Report to Homes NSW

September 2025



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EXECUTIVE SUMMARY

Artefact Heritage and Environment have been engaged by Homes NSW (the proponent) to prepare a Statement of Heritage Impact with an Archaeological Assessment for the proposed residential development at the site located at 211A – 215 Harbour Drive, Coffs Harbour (the study area). The study area is currently unoccupied with only remnant fencing visible. The site is located adjacent to the Coffs Harbour Local Environmental Plan 2013 heritage listed item 'Former police station and courthouse,' (LEP no. I15) and across the road from the 'Coffs Harbour Public School' (LEP no. I25).

Overview of findings

Built

- There are **no** statutory or non-statutory heritage items within the boundaries of the study area
- There are **two** heritage items listed on **two** separate heritage registers in the vicinity of the proposed works:
 - Coffs Harbour Public School (LEP no. I25; NSW Dept. of Education s170 Register SHI no. 5064316)
 - Former Police Station and Courthouse (LEP no. I15)

Based on the drawings in the Studio Johnston *211A-215 Harbour Drive Coffs Harbour State Significant Development Application*, which were issued on 29 August 2025, the proposed works would result in the following heritage impacts:

- **Little to no adverse** physical impacts to the heritage significance of the Former Police Station and Courthouse and Coffs Harbour Public School
- **Minor adverse** visual impacts to the heritage significance of the Former Police Station and Courthouse and Coffs Harbour Public School.

Archaeology

The site has **low- moderate** potential for works that reaches local significance and **nil-low** potential for relics.

The early 20th-century remains of a Mounted Police paddock, stables and twin toilets which were originally built within the boundaries of the current study area (215 Harbour Drive) and associated with the Coffs Harbour Police Station and Court house, are assessed as possessing local archaeological significance for their potential to contribute to an understanding of the spatial development and policing infrastructure of the area.

While associated with the broader historical landscape of the SHI-listed local heritage site (Item no. I15), they fall outside of the Coffs Harbour former police station and courthouse listing curtilage and are not themselves listed. The archaeological resource is considered not significant enough to warrant in-situ retention. Accordingly, impacts associated with proposed removal are considered acceptable, subject to appropriate mitigation through archival recording and monitoring.

Approval pathway

This combined Statement of Heritage Impact (SoHI) and Historical Archaeological Assessment (HAA) has been prepared by Artefact Heritage on behalf of Homes NSW for a State Significant Development Application (SSD 83294209) for the construction of a residential flat building up to four storeys with a total of 60 affordable housing apartments. Secretary's Environmental Assessment Requirements (SEARs) issued on 2 May 2025 state that where there is potential for direct or indirect impacts on environmental heritage, a Statement of Heritage Impact and Archaeological Assessment (where required) is completed, in accordance with the relevant guidelines.

Recommendations and mitigation measures

Consideration should be given to the following recommendations.

Built

- Consideration should be given to the provision of heritage interpretation as part of the project, which would outline the history, associations and significance of the site and wider area. Interpretive measures could involve interpretive signage, panels or displays.
- The vibration assessment for the project must take into consideration the German Standard DIN 4150 – Part 3 guidelines regarding expected peak particle velocity (PPV)¹ and establish if there is potential for effects of vibration to built heritage items in the surrounding area. If there is potential for vibration to affect built heritage items, further advice from a Heritage Consultant must be sought regarding requirements for vibration monitoring and condition checks.

Archaeology

Heritage induction

It is recommended that a heritage induction be prepared and provided by a suitably qualified historical archaeologist. This induction must identify sensitive areas and the types of archaeological remains that may be encountered during excavation works. This induction must outline the requirements of the project under the Heritage Act 1977 (NSW), including the statutory obligations relating to relics and approvals.

The induction should emphasise that any remains identified must be assessed in accordance with the findings of the approved archaeological assessment, and that the treatment of such remains must be consistent with the recommendations of those documents. The induction must also outline the legal requirement to cease work and notify Heritage NSW in the event of the discovery of archaeological relics not previously identified.

The induction should further highlight the responsibilities of contractors and site personnel in protecting heritage values, and the procedures for immediate reporting of finds to the project archaeologist. It is recommended that the induction be delivered prior to the commencement of ground-disturbing activities and be repeated for any new personnel joining the project. Attendance should be recorded to ensure all staff are aware of their obligations.

¹ DIN 4150-3:2016-12, Vibration in buildings – Part 3: Effects on structures.

General Recommendations

- Any additions or design modifications to the proposal, outside the scope of this assessment, would require additional heritage assessment to ensure consistency with this assessment.
- A copy of this report should be provided to Coffs Harbour Council to inform them of the proposal and the potential impacts to the study area.

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1.0 INTRODUCTION

1.1 Project background

Artefact Heritage and Environment (Artefact Heritage) have been engaged by Homes NSW (the proponent) to prepare a Statement of Heritage Impact (SoHI) with an Archaeological Assessment for the proposed residential development at the site located at 211A – 215 Harbour Drive, Coffs Harbour (the study area). The study area is currently unoccupied with only remnant fencing visible. The site is located adjacent to the Coffs Harbour Local Environmental Plan (LEP) 2013 heritage listed item 'Former police station and courthouse,' (LEP no. I15) and across the road from the 'Coffs Harbour Public School' (LEP no. I25).

This SoHI and HAA has been prepared by Artefact Heritage on behalf of Homes NSW for a State Significant Development Application (SSD 83294209) for the construction of a residential flat building up to four storeys with a total of 60 affordable housing apartments.

Artefact Heritage and Environment (Artefact Heritage) produced a Preliminary Constraints Advice Report to identify the key matters relating to non-Aboriginal heritage that may require further assessment in May 2025. The report noted that further assessment of the study area was required. The Secretary's Environmental Assessment Requirements (SEARs) issued on 2 May 2025 outline that where there is potential for direct or indirect impacts to environmental heritage a Statement of Heritage Impact and Archaeological Assessment be submitted.

This Statement of Heritage Impact and Archaeological Assessment report has been prepared to meet the requirements of Condition 22 of the SEARs. ²

Table 1: Condition 20 of the project SEARs

SEAR	Supporting Documentation
22. Environmental Heritage	<u>If required:</u>
<ul style="list-style-type: none">Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	<ul style="list-style-type: none">Statement of Heritage ImpactArchaeological Assessment

1.2 Study area

The study area (Figure 1) is defined as 211A-215 Harbour Drive, Coffs Harbour (Lot 15 Section 11 DP504105, Lot 14 DP516300, and Lot 100 DP1041655). It measures approximately 3,804m² and is located within the City of Coffs Harbour Local Government Area (LGA).

1.3 Methodology

This SoHI identifies listed heritage items within 250 metres of the study area and assesses the heritage impact of the proposed development on the heritage places and provides recommendations and mitigation measures to minimise the heritage impact. It includes a summary history of the locality and place, identification of relevant heritage listings and reasons for their listing, assesses possible

² Planning Secretary's Environmental Assessment Requirements, SSD 83294209

heritage impacts arising from the works, and offers recommendations to mitigate any impacts while enabling the required project outcomes.

This report was informed by a review of the following existing documentation:

- Heritage NSW databases including the SHR, Local Environmental Plans (LEPs) and Section 170 (s170) Heritage & Conservation Register listings, and non-statutory heritage databases such as the Register of the National Trust and the National Trust of Australia (NSW)
- Existing heritage studies and reports for the study area and locality, and
- Background historical literature including local history studies and resources, primary historical records and aerial photography.

This report was prepared in accordance with the principles and procedures established by the following documents:

- Guidelines for preparing a statement of heritage impact³ and Archaeological Assessments⁴
- The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance⁵
- Assessing heritage significance—Guidelines for assessing places and objects against the Heritage Council of NSW criteria⁶
- Historical Archaeology Code of Practice⁷

1.4 Author identification

This report has been prepared by Katherine Douglas (Graduate Heritage Consultant), Daniel Dompierre-Outridge (Heritage Consultant) and Sammuell Sammut (Senior Heritage Consultant) with input and review provided by Jenny Winnett (Principal), all from Artefact Heritage.

1.5 Limitations

This report provides an assessment of built and historical (non-Aboriginal) heritage and their values only and does not assess Aboriginal cultural heritage. This report only assesses impact to listed heritage items located within a 250 metre (m) buffer zone of the study area.

1.6 Acknowledgements

Acknowledgements to local studies officer Belinda Lancey from City of Coffs Harbour library and the members of the Yarrilla Arts and Museum for their time and valuable contribution to the research of the old police station and courthouse history and layout for the study area.

³ Heritage NSW, 2023B. Guidelines for preparing a statement of heritage impact

⁴ Heritage NSW, 1996. *Archaeological assessments*

⁵ Australia ICOMOS 2013 The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance

⁶ NSW Government, Department of Planning and Environment, Assessing Heritage significance: Guidelines for addressing places and objects against the Heritage Council of NSW criteria, 2023.

⁷ Heritage NSW, 2006. *Historical archaeology Code of Practice*.



Figure 1: Location of the study area in Coffs Harbour

2.0 LEGISLATIVE CONTEXT

2.1 Overview

This section discusses the heritage management framework, notably legislative and policy context, applicable to the proposed development and study area.

2.2 Identification of heritage listed items

Heritage listed items were identified through a search of relevant state and federal statutory and non-statutory heritage registers:

- World Heritage List (WHL)
- Commonwealth Heritage List (CHL)
- National Heritage List (NHL)
- State Heritage Register (SHR)
- Section 170 Heritage and Conservation Registers
- NSW State Heritage Inventory database
- Coffs Harbour Local Environmental Plan (LEP) 2013

Items listed on these registers have previously been assessed against the heritage assessment guidelines relevant to their peak governing body. Items that are of Commonwealth, National and World heritage significance have been assessed in accordance with the Environmental Protection and Biodiversity Conservation Act 1999 (the EPBC Act). Items of state or local significance have been assessed against the NSW Heritage Assessment guidelines. Assessments of heritage significance as they appear in relevant heritage inventory sheets and documents, are provided in this assessment.

There are several items of legislation that are relevant to the current study area. A summary of the relevant Acts and the potential legislative implications are provided below.

2.3 The World Heritage Convention

The Convention Concerning the Protection of World Cultural and National Heritage (the World Heritage Convention) was adopted by the General Conference of the United Nations Educational, Scientific and Cultural Organisation (UNESCO) on 16 November 1972, and came into force on 17 December 1975. The World Heritage Convention aims to promote international cooperation to protect heritage that is of such outstanding universal value that its conservation is important for current and future generations. It sets out the criteria that a site must meet to be inscribed on the World Heritage List (WHL) and the role of State Parties in the protection and preservation of world and their own national heritage.

There are **no** heritage items listed on the World Heritage List within the study area.

2.4 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides a legislative framework for the protection and management of matters of national environmental significance, that is, flora, fauna, ecological communities and heritage places of national and international importance. Heritage items are protected through their inscription on the World Heritage List, Commonwealth Heritage List, or the National Heritage List. The EPBC Act stipulates that a

person who has proposed an action that will, or is likely to, have a significant impact on a World, National or Commonwealth Heritage site must refer the action to the Minister for Sustainability, Environment, Water, Population and Communities (hereafter Minister). The Minister will then determine if the action requires approval under the EPBC Act. If approval is required, an environmental assessment would need to be prepared. The Minister would approve or decline the action based on this assessment. A significant impact is defined as “an impact which is important, notable, or of consequence, having regard to its context or intensity.” The significance of the action is based on the sensitivity, value and quality of the environment that is to be impacted, and the duration, magnitude and geographic extent of the impact. If the action is to be undertaken in accordance with an accredited management plan, approval is not needed and the matter does not need to be referred to the Minister.

2.4.1 Commonwealth Heritage List

The Commonwealth Heritage List (CHL) has been established to list places of outstanding heritage significance to Australia. Established under the EPBC Act, the CHL comprises natural, Indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control.

There are **no** heritage items listed on the Commonwealth Heritage List within the study area.

2.4.2 National Heritage List

The National Heritage List (NHL) has been established to list places of outstanding heritage significance to Australia, including places overseas. There are nine matters of national environmental significance, these include Australia’s world heritage properties (as listed on the World Heritage List [WHL]), national heritage places, wetlands of international importance (listed under the Ramsar Convention), migratory species, listed threatened and ecological communities, Commonwealth marine areas, the Great Barrier Reef Marine Park, nuclear actions including uranium mining, and water resources in relation to coal seam gas developments and large coal mining developments.

There are **no** heritage items listed on the National Heritage List within the study area.

2.5 Heritage Act 1977

The NSW *Heritage Act 1977* (Heritage Act) provides protection for items of ‘environmental heritage’ in NSW. ‘Environmental heritage’ includes places, buildings, works, relics, movable objects or precincts considered significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. Items considered to be significant to the State are listed on the SHR and cannot be demolished, altered, moved or damaged, or their significance altered without approval from the Heritage Council of NSW.

2.5.1 State Heritage Register

The SHR was established under Section 22 of the Heritage Act and is a list of places and objects of particular importance to the people of NSW, including archaeological sites. The SHR is administered by Heritage NSW, and includes a diverse range of over 1,500 items, in both private and public ownership. To be listed, an item must be deemed to be of heritage significance for the whole of NSW. For works to an SHR item, a Section 60 application must be prepared for works that are not exempt under Section 57(2) of the Heritage Act.

There are **no** heritage items listed on the State Heritage Register within the study area.

2.5.2 Archaeological relics and works

The Heritage Act also provides protection for 'relics', which includes archaeological material or deposits. Section 4 (1) of the Heritage Act (as amended in 2009) defines a relic as:

"...any deposit, artefact, object or material evidence that:

- (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and*
- (b) is of State or local heritage significance"*

Sections 139 to 146 of the Heritage Act prevent the excavation or disturbance of land known or likely to contain relics, unless under an excavation permit. Section 139 (1) states:

A person must not disturb or excavate any land knowingly or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, damaged or destroyed unless the disturbance is carried out in accordance with an excavation permit.

Excavation permits are issued by the Heritage Council of NSW, or its Delegate, under Section 140 of the Heritage Act for relics not listed on the SHR or under Section 60 for impacts within SHR curtilages. An application for an excavation permit must be supported by an Archaeological Research Design (ARD) and Archaeological Assessment prepared in accordance with the NSW Heritage Division archaeological guidelines. Minor works that would have a minimal impact on archaeological relics may be granted an exception under Section 139 (4) of the Heritage Act. However, the proposal is subject to Part 5.2 (State significant infrastructure) provisions of the EP&A Act, and therefore excavation permits, or exemptions would not be required.

Items identified as 'works' do not trigger reporting obligations under the Heritage Act, unless they are associated with artefacts and/or assessed to be of State or local significance. Works generally include:

- Former road surfaces or pavement and kerbing.
- Railway infrastructure
- Former water supply (wells, cisterns, drains, pipes)
- Building footings.

2.5.3 Conservation Management Plans

Under Section 38A of the Heritage Act, if a Conservation Management Plan (CMP) is prepared for an item listed on the SHR, the Heritage Council of NSW may endorse the plan, and use the CMP to make regulations or provisions in relation to the SHR item. A CMP is not required under the Heritage Act, however the Heritage Council of NSW continues to recommend the preparation of CMPs as best practice heritage management documents for places of State Heritage significance and to consider suitable site-specific exemptions.

No CMPs pertaining to the study area have been identified.

2.5.4 Section 170 registers

Under the Heritage Act all government agencies are required to identify, conserve and manage heritage items in their ownership or control. Section 170 (s170) requires all government agencies to maintain a Heritage and Conservation Register that lists all heritage assets and an assessment of the significance of each asset. They must also ensure that all items inscribed on its list are maintained with due diligence in accordance with State Owned Heritage Management Principles approved by the

Government on advice of the NSW Heritage Council. These principles serve to protect and conserve the heritage significance of items and are based on NSW heritage legislation and guidelines.

There is **one** heritage item adjacent to the study area listed on the NSW Department of Education S170 Register:

- Coffs Harbour Public School - Buildings B00B-B00D, B00F, B00G and B00I, Heritage NSW State Heritage Inventory (SHI) no. 5064316

2.6 Environmental Planning and Assessment Act 1979 (NSW)

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 and development consent process. The EP&A Act requires that environmental impacts are considered prior to land development; this includes impacts on cultural heritage items and places as well as archaeological sites and deposits.

The EP&A Act also requires that local governments prepare planning instruments (such as Local Environmental Plans [LEPs] and Development Control Plans [DCPs]) in accordance with the EP&A Act to provide guidance on the level of environmental assessment required. The study area falls within the boundaries of the Coffs Harbour local government areas. Schedule 5 of the Coffs Harbour LEP (LEP) includes a list of items/sites of heritage significance within this LGA.

When a project is approved as an SSD or SSI under s5 of the EP&A Act, the conditions and provisions of other state and local instruments are turned off and approved works are undertaken in accordance with relevant Instruments of Approval.

The project is subject to approval as SSD 83294209 under s5.19 of the EP&A Act and as such is subject to conditions in Schedule 2 of the Infrastructure Approval issued by the Minister.

2.6.1 Coffs Harbour Local Environmental Plan 2013

Heritage items listed on the Coffs Harbour LEP 2013 are managed in accordance with the provisions of Section 5.10 Heritage Conservation of this LEP. Under Clause 5 of this section of the Coffs Harbour LEP 2013:

The consent authority may, before granting consent to any development:

(a) on land on which a heritage item is located, or

(b) on land that is within a heritage conservation area, or

I on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

The study area is in the vicinity of heritage items included on Schedule 5 of the Coffs Harbour LEP 2013. The following items within the 250m heritage curtilage of the study area (211A-215 Harbour Drive, Coffs Harbour) are listed on Schedule 5 of the Coffs Harbour LEP 2013:

- Former police station and courthouse, LEP Item no. I15
- Coffs Harbour Public School – LEP Item no. I25

2.6.2 Development Control Plan

The Coffs Harbour DCP 2013 is a supporting document that compliments the provisions contained within the Coffs Harbour LEP 2013 and provides specific design detail in regard to sympathetic development on, or in the vicinity of, items listed on Schedule 5 of the Coffs Harbour LEP 2013.

Part F2.2 Heritage Conservation of the DCP 2013 provides sympathetic considerations for development that is in the vicinity of a heritage listed item. These considerations include ensuring that the character, bulk, scale and height of new development does not unreasonably overshadow a nearby heritage item, that colouring and texture of new materials of a new development is sympathetic to a heritage item, and that views of a heritage item should not be obscured from the point of view of areas of public domain.

2.7 Non-Statutory Considerations

2.7.1 Register of the National Estate

The RNE is no longer a statutory list; however, it remains available as an archive.

There are **no** heritage items in the vicinity of the study area listed on the RNE.

2.7.2 National Trust of Australia (NSW)

Listing on the National Trust of Australia Heritage Register (NTAR) does not impose statutory obligations and is more an indication of the heritage significance held by the community.

There are **no** heritage items in the vicinity of the study area listed on the NTAR.

2.8 Summary of heritage listings

The study area comprises 211A-215 Harbour Drive, also known as Lot 15 Section 11 DP504105, Lot 14 DP516300, and Lot 100 DP1041655. While there are no heritage curtilages present within the study area, there are heritage items in its vicinity on multiple heritage registers as outlined in Table 2. The curtilages of these items are illustrated in Figure 2.

Table 2: Results of register searches for the study area and adjacent heritage items

Register	Study Area/Item	Items in the vicinity
Section 170 Registers (NSW Department of Education)	None	- Coffs Harbour Public School - Buildings B00B-B00D, B00F, B00G and B00I, Heritage NSW State Heritage Inventory (SHI) no. 5064316
Coffs Harbour LEP 2013	None	- Former police station and courthouse, LEP Item no. I15 - Coffs Harbour Public School – LEP Item no. I25

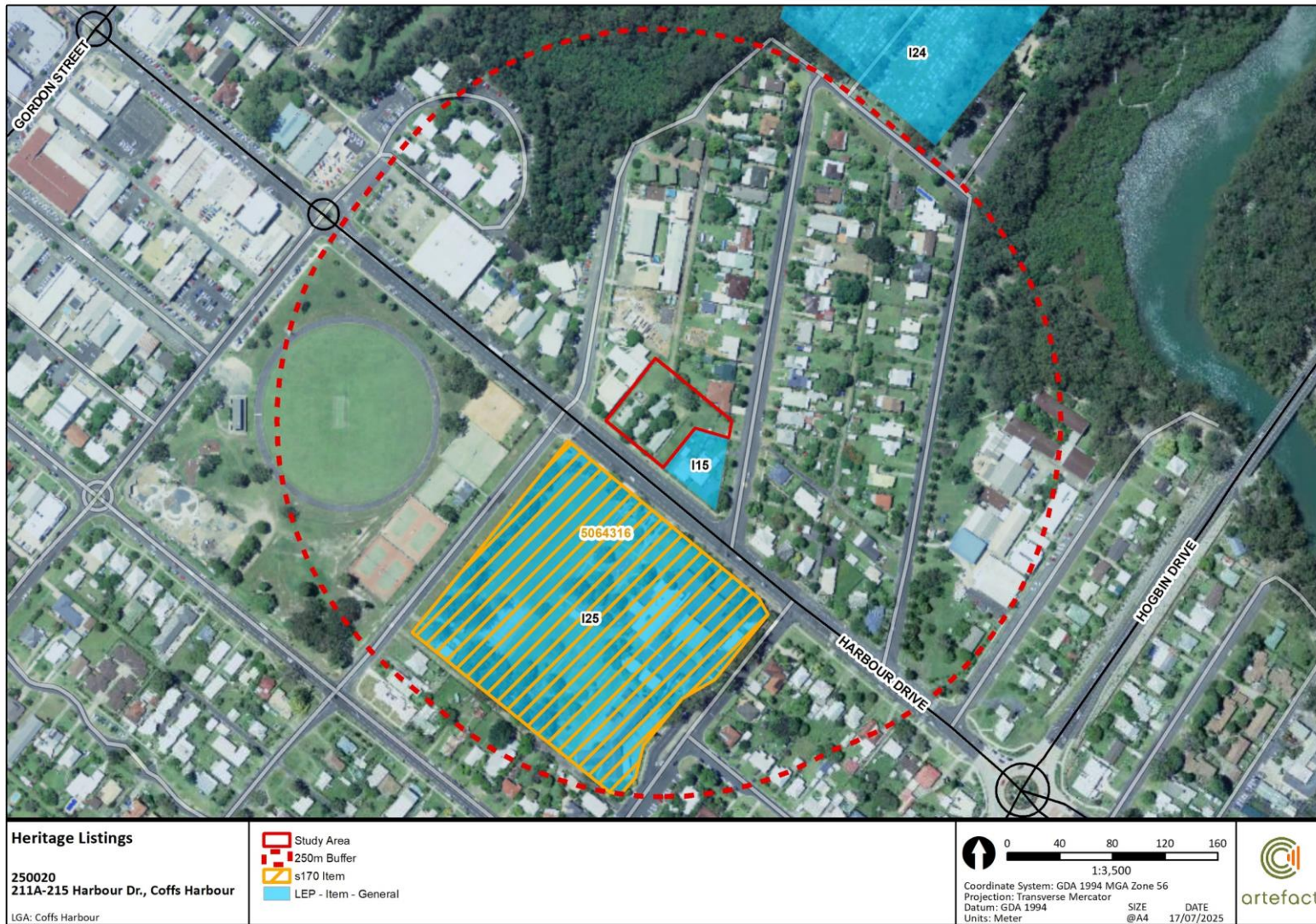


Figure 2: Heritage curtilages in the vicinity of the study area at 211-215 Harbour Drive, Coffs Harbour (Source: Artefact 2025)

3.0 HISTORICAL BACKGROUND

3.1 Aboriginal history

Gumbaynggirr people have lived on the northern coast of NSW for tens of thousands of years. With such a resource rich area of rainforests, rivers, waterways, inlets, headlands and beaches, they were historically one of the largest groups of Aboriginal people living in coastal NSW. In fact, Gumbaynggirr were renowned as the 'sharing people' because their land was so rich that food and other resources were commonly shared with other nations.

Gumbaynggirr Country is diverse, extending from around the Nambucca River in the south to around the Clarence River in the north, from the Pacific coast and into the mountains of the Great Dividing Range in the west. This Country has been estimated to be around 6,000 square kilometres. While the coast was an important focus and Gumbaynggirr are often known as 'Saltwater' people, many people from Grafton (Jadalmany), Coffs Harbour (Garlambirla), Nambucca (Nyambaga) and inland of these places identify as Gumbaynggirr. Some say they are 'saltwater/freshwater' people, moving to the coast during winter and back into the valleys when the hot summers arrive.⁸

There are a number of recognised clan groups within the Gumbaynggirr Nation, including the Garby Elders, Garlambirla Guyuu Girrwa (Coffs Elders group), Gumbular Julipi Elders and Bagawa. The Garby Elders (Gaabi – swamp wallaby) 'are a tribal group who recognise the lands and seas from Moonee northward along the coast past Wooli and inland to the east bank of the Orara River.' Arrawarra Headland lies at the heart of the Garby Elders' Country. Another 'epicentre' of Gumbaynggirr Country is around present day Coffs Harbour – but it must be noted that such sites of significance are bound up in complex connections with Country that can be far beyond any immediate place or site. As one informant to the Murawin report on Coffs Harbour noted, 'Think of Country like a body – it can't be broken up.'⁹

Gumbaynggirr Country sustained many people, especially compared to inland areas such as the New England tablelands, with estimates of several thousand living in close-knit territories. Both Yaegl and Gumbaynggirr peoples generally occupied a 'core tribal area' all year round, moving between the coast, rivers and hinterland. They hosted other groups for feasts and ceremonies and travelled long distances for ceremonial occasions and events such as the Bunya gathering in southern Queensland. Along with the pathways of Ancestors and 'mythological beings', such regular movement generated 'songlines' and 'storylines' all across Gumbaynggirr Country, linking communities in ceremony, lore, food harvest sharing, trade and marriage. In a vast network criss-crossing this Country, often intangible inscriptions of meaning onto the landscape have occurred over millennia.¹⁰

Traditional life and culture on Gumbaynggirr Country was rich and diverse. Natural resources were used to make a number of items used in a wide range of activities. Rainforest timbers were used for shields, clubs and spears. Spears were made from straight, young saplings as well as older hardwood that was cut out of larger trunks. Shafts were hardened over flames and polished and seasoned with animal fat. Spear tips were made from stone or shell. Other hunting implements

⁸ Murawin, 2022 'Community Consultation and Outcomes Report, Coffs Harbour Jetty', p. 1; 'Gumbaynggirr', Muurrbay Aboriginal Language and Culture Cooperative.'

⁹ Gumbaynggirr Nation' <https://www.yumpu.com/en/document/read/8421334/project-fact-sheets-the-arrawarra-sharing-culture-project>; Murawin, 'Community Consultation and Outcomes Report, Coffs Harbour Jetty Revitalisation Draft Masterplan', 2022, p.10

¹⁰ Kijas notes that 'pre-1788 population estimates of archaeologist Jim Belshaw are widely cited' and that Belshaw used the records of the Commissioners of Crown Lands such as Oliver Fry who in 1842 estimated a population of about 2000 people for the Clarence and Richmond regions. Kijas, 'There were always people here', pp. 15-16

included throwing sticks, boomerangs and spears tipped with barbed, tapered and multi-pronged forms depending on their purpose.¹¹

Shelters were made from large sheets of swamp mahogany bark. The leaf sheaths of Bangalow palms were used to carry water and honey by folding each sheath into a U-shape and inserting a sharpened stick through the top of the two arms to form a handle. Food containers were made of bark. Canoes were commonly carved from the trunks of honeysuckle Banksia trees that grew in the Coffs Harbour area. Women made nets from long strands of fibre from hibiscus bark which flourished along creeks in the area. The nets were used for catching fish, including shoals of mullet. Running Postman vine was used to weave traps to place in the creeks. Tea-tree bark was used for wrapping small children in a woven carry-bag slung on their mother's back.¹²

Movement between the coast and hinterland largely depended on where resources were at certain times of the year. Coastal visits were made when the mullet were running in late autumn and early winter. The fruiting of the lilly-pilly (wild cherry) trees occurred at that time too. Lilly-pillies grew in profusion behind the sand dunes, in semi shaded gullies and on rainforest margins bordering the whole mid-north coastal plain. Woolgoolga lilly-pillies were believed to have been called wei-gul-gas, which seems to be the origin of the modern day town's name. Other plants included palms, native grapes and 'roly-poly trees'.

This movement between hinterland and coast provided a rich and diverse diet that included possums, kangaroo, wallaby, bandicoots, echidna, snakes and flying foxes. Various birds such as pigeons were often hunted with throwing sticks. On the coast, mussels and oysters were taken from the rocks and pipis could be gathered on the beach. Nets and fences of 'brushwood' were made to trap animals and kangaroo hunts or 'drives' were often conducted by large gatherings of several family groups in unison. This movement between different locations promoted the sustainable use of resources, which were allowed to rest and recover before the return visit.¹³

The areas around Boambee and Bonville Creeks were especially rich sources of food. There were early colonial reports of numbers of Aboriginal people camped in the Moonee area, where they had shelters near the sand dunes on the north end of Moonee Beach, with other camps 'back towards the hills'. One camp was apparently near the current location of the Coffs Harbour Gun Club, in an area 'typical of the low hills and slopes used for main camps'. Many other sites are known in the Moonee Creek area. The Bagawa clan, who were based in the Bucca Creek-Nana Glen area, are reported to have spent the winter months on the coast around Moonee, before returning home in the summer. Other campsites have been identified at East Boambee and West Korora (where people lived in the 1940s on the site of a traditional camp).¹⁴

Coffs Harbour was a thriving, important place for millennia. It was the centre of an annual gathering during the mutton bird season. People from all across the Gumbaynggirr nation came and camped near Corambirra Point at what became 'Happy Valley' and along Coffs Creek, according to one recollection, up to 'where the showground is today'.¹⁵

Despite massive disruption and dislocation during the last two hundred years, a number of stories have continued to be told about Gumbaynggirr Country. Another pathway runs from Macauleys Headland to Sealy Point and through to Mount Coramba and the Orara Valley and Nana Glen. The Gumgali storyline pathway is associated with the Gumgali or black goanna Dreaming storyline and links to other key sites within the region including Mount Coramba. From this pathway the 'Sealy Point Pathways' connect with the Orara Valley, Mount Browne, and the Coffs Creek headwaters (Kelleher Nightingale Consulting 2020).

¹¹ Thomas, 2013 'Indigenous History of the Coffs Harbour Region'; Yeates, Coffs Harbour, p.10

¹² Thomas 2013 'Indigenous History of the Coffs Harbour Region'; Yeates, Coffs Harbour, p.10

¹³ Ryan 1988, The land of Ulitarra, pp. 129-130

¹⁴ Thomas 2013 'Indigenous History of the Coffs Harbour Region'; Yeates, Coffs Harbour, p.10

¹⁵ Kelleher Nightingale Consulting 2020

3.2 Region history

Population growth led to calls for government infrastructure to support the community. In September of 1880 and April of 1881 petitions were made to the Postmaster General for the establishment of a regular postal service to the Coffs Harbour region. In 1882 a Receiving Office was built in Coffs Harbour and in 1890 was upgraded to a functioning Post Office. Another small community developed closer to the harbour, known as 'Jetty Town': 'A small resident population developed in the streets behind the jetty distinct to the other Coffs Harbour community that was becoming established around Grafton, Moonee and Coramba Streets. In 1906 the small community was granted its own post office'.¹⁶

By the late 19th century, the Coffs Harbour region lacked suitable harbour facilities to support the growing industry and population of the area. Lumber and other commodities were ferried by surf boats to and from larger shipping vessels anchored in deeper waters outside of the harbour. By 1885, as the volume of production increased, there were many appeals and petitions for a government funded jetty to be constructed. The Coffs Harbour Jetty was built in 1892 by the NSW Public Works Department, measuring approximately 500 metres in length and 6.5 metres in width.¹⁷ In addition to the new jetty, a small five-ton crane was installed at the shore end in 1898 to help with movement of shipments. The crane facility at the jetty was repeatedly upgraded throughout the 20th century.

The Coffs Harbour railway line began construction in 1911 following extensive petitions by the inhabitants of Coffs Harbour who were seeking better avenues for production and consumption.¹⁸ The early 20th century also saw the development of the Coffs Harbour breakwater which linked Muttonbird Island and South Coff Islands (Corambirra Point) with the mainland, as well as the construction of an additional breakwater stretching north-east from South Coff Island, all beginning construction in 1912. In 1913 a timber trestle bridge was built, connecting South Coff Island to the mainland to assist in the transport of rock from a quarry at South Coff Island for use in construction of the breakwaters. The breakwaters were completed with concrete capping which took place between 1939 and 1941. They provided the harbour with extensive protection from unpredictable weather and tidal movements of the previously open ocean waters, which facilitated safer shipping and marine activity between Coffs Harbour and the eastern coast of Australia.¹⁹

The expansion of the banana industry in the early 20th century also played a significant role in Coffs Harbour's economy. Banana plantations became a prominent feature of the landscape, leading to the town being known as the 'Banana Coast'.²⁰

3.2.1 Late 20th century and early 21st century developments

In the second half of the 20th century sand mining became the primary industry of the Coffs Harbour region. From the 1950s to the 1980s the outer sand barriers of Coffs Harbour were targeted with dredging and extraction at such sites as North Corindi Beach, Arrawarra/ South Corindi Beach and Moonee Beach.²¹ The population of the area also grew within this time, with a growing population of Sikh and Dutch migrants moving to the area for the available work associated with the growing industry.²²

During this time, tourism steadily increased alongside the residential population of the area. A census taken in the early 1990s identified a population of approximately 35,000 residents in the Coffs

¹⁶ State Heritage Inventory 'Post Office – Coffs Harbour'

¹⁷ The Sydney Morning Herald (August 6, 1892). Opening of the Coff's Harbour Jetty, p. 10.

¹⁸ Carley et al. (2006).

¹⁹ Carley et al. (2006).

²⁰ SJB, 2025, Urban Design Report, p. 18.

²¹ BMT WBM Pty Ltd (2009) p. 48.

²² Hedditch, R (2013).

Harbour region. As of 2022, the region is now populated by an approximate 80,000 residents with annual tourist numbers estimated to be an additional 50,000 people, demonstrating a two-fold increase in population over the course of a 30-year period.²³ In the 21st century, the region is now driven predominantly by the tourist industry with the town noted for its banana plantations, resorts, beachfront activities and fishing. The transition from industrial work to tourism has seen the Coffs Harbour infrastructure transform in order to facilitate the annually increasing tourist population. Hotel services and accommodation and local restaurant and food industry business have been developed across the 30 kilometres of local coastline. The tourist fishing and whale watching industry is also a focal attraction in the area with the marina and other sites along the coastline facilitating harbour deep sea fishing and whale watching expeditions.²⁴

3.2.2 Study area development and the former Courthouse and Police Station

The parcel of land which the study area boundary is located on was listed in the earliest available Parish Maps 1906, 1912 (Figure 13), 1923 and 1931 as 'R38291 fr. Sale and R38292 fr Lse Gen for Police Purposes – Notified 24th Sept '04.' This allocation of land indicates that the lease for general police purposes was the block of land. The original combined courthouse and police station building was completed in 1907 at a cost of 986 pounds. The plans for the original structure were designed by Government Architect W.L.Vernon²⁵ who produced numerous conjoined police and judicial buildings on the North Coast which were listed on the Section 170 NSW Police Service Heritage Conservation Register (1992) including in Coramba (built 1896), Coopernook (built 1900), Dorrigo (built 1904) and Mullumbimby (built 1908). Weatherboard construction was less common than brick for police and judicial buildings on the North Coast.²⁶

The State Heritage Inventory states that the original allotment allowed for a horse paddock and stables but does not indicate the extent of the original boundary. Site plans from Coffs Harbour library and Coffs Harbour Museum indicate the general location and size of the horse paddock and associated structures which have informed analysis of the archaeological potential of the site (Figure 9 to Figure 11). The 1925 image of the courthouse (Figure 5) details horse paddock fencing which indicates that the entire northwest side of the property was used for horse grazing

In description of the life and works of one of the first officers located at the police station Constable Donald McKay Harper the heritage item is discussed as follows:

In 1906 construction began on the Coffs Harbour Police Station located in High Street opposite the Coffs Harbour public school. The building contained a Courtroom and several offices as well as two cells and police living quarters with a forage room and two stables at the rear. When the station came into operation in February 1907 it was manned by two officers, Senior Constable Arthur Herbert Belson and Constable Donald McKay Harper.²⁷

The two cells and exercise yard as indicated in Figure 9 to Figure 11 were located to the back of the property within what is the current boundary of the court house and police station heritage listing and the remains of which are not associated within the study area.

²³ City of Coffs Harbour Community Profile (2022).

²⁴ Aussie Towns (2023). Coffs Harbour, NSW.

²⁵ Jamison 2011 p. 8

²⁶ Section 170 NSW Police Service Heritage and Conservation register (1992) referenced in Jamison 2011 p. 4

²⁷ Donald McKay Harper. Coffs collection Accession number LS2023.81.1. p.2

The original PWD/Government Architect plans have not been located and were not included in the State Heritage Inventory records.²⁸ In 1919 works were done to the building presumably using a plan by the NSW Govt Architects Office (not found).

The use of the extant building as a police station and courthouse ceased after a new police station was built at the jetty in 1920 and the old Bank of NSW was converted to use as a police station and courthouse.

*"The lock ups and exercise yard were moved, the paddock reservation for police purposed was cancelled on 12 December 1929 and the building vacated in early 1930. The building continued to be used for police accommodation and became quarters for a married constable."*²⁹

The horse paddock reservation for police purposes was cancelled on 12.12.1929 and the old courthouse was rented in 1932 to the Department of Agriculture, but only for a short time. For over fifteen years it remained vacant. During this time the residence remained as police residence. John Orman moved into the police residence with his family in 1947 at the age of fifteen and remained there until approximately 1954. His recollection of living at the police residence was included in Jamison (2011)

*The only toilet was outside, on the fence adjacent to the old courthouse and north of his bedroom. There were two toilets side by side. The stables occasionally housed horses for court matters and his job was to feed and water them. The police site down to Curacoa street was fenced with timber posts, two rails and wires. He grew crops in the horse paddock, including corn.*³⁰

This statement confirms the 1940 historic aerial (Figure 14) and Figure 10 that the two structures located separate to the combined courthouse and police station (and located within the current study area) were a toilet and stables. The toilet and stables were both still extant until at least 1954 as indicated in the proposed subdivision (Figure 17). Although the paddock was revoked for police purposes in 1929 the stables and paddock were still in infrequent use in the study area up until this time.

The NSW Public Works departments converted the building into two flats and the building was used as rental accommodation until 1973. It is likely that two weatherboard garages were built at some time in the early 1970s (not located within the study area).

The original block of land (including the study area) in 1906 was divided by 1954 as indicated on the 1954 Coffs Harbour Town map (Figure 16). The block was divided into Lots 13,14,15 and 1. The study area includes the entirety of Lot 14 and 15 and part of Lot 1. Lot 1, as indicated on the Figure 16 and Figure 18 Parish maps includes what is now Lots 100 (the study area) and 101 DP 1041655 (LEP I15) on the NSW Land Registry Services (Figure 19).³¹

A cadastral records enquiry report for Lot 100 DP 1041655 (part of the study area) indicates that this land was 'acquired for the purposes of the Housing Act 2001 (NSW Gazette 08-11-2002 folio 9555)' confirming, in addition to the Parish maps and the State Heritage Inventory description of heritage item I15, that Lot 100 was part of the original land portion of the police station and courthouse. The police station was added to the Local Environment Plan 27 September 2013; therefore, the

²⁸ State Heritage Inventory 'Police station and courthouse (former)' I15

²⁹ State Heritage Inventory 'Police station and courthouse (former)' I15

³⁰ Jamison 2011 p. 17

³¹ NSW Land registry services

boundaries of the heritage item are restricted only to the Lot 101 DP1041655 boundary 215A Harbour Drive.

3.2.3 1954 Parish Map

The study area is divided by 1954 (Figure 16), into Lots 13, 14, 15 and 1. Unlike property divisions surrounding the study area which have individual owners listed on the town plan map the study area is not indicated under an individual owner. Handwritten on the 1954 town map (Figure 16) are the following numbers indicating Lot sale and allocation and use for land:

3.2.3.1 Lot 14 (211A Harbour Drive)

123: R38291 for sale. For police purposes. Noted 24th Sept 1904 (Allots 1, Sec 11) – Allot 13 revoked Gaz 14.9.62, Allots 13,14 &15 revoked Gaz 31.8.62.

139: Appropriated by housing commission Gaz 4.12.64

3.2.3.2 Lot 15 (213 Harbour Drive)

123: R38291 for sale. For police purposes. Noted 24th Sept 1904 (Allots 1, Sec 11) – Allot 13 revoked Gaz 14.9.62, Allots 13,14 &15 revoked Gaz 31.8.62.

126: Allot. 15 Sec 11 Acquired for housing purposes Gaz 23.11.62

3.2.3.3 Lot 1 (215 and 215A Harbour Drive)

123: R38291 for sale. For police purposes. Noted 24th Sept 1904 (Allots 1, Sec 11) – Allot 13 revoked Gaz 14.9.62, Allots 13,14 &15 revoked Gaz 31.8.62.

3.2.4 1971 Parish Map

The following numbers indicating Lot sale and allocation for land, were noted on the 1971 Parish map (Figure 18) this is after the properties on 211A and 213 have been built as indicated in the 1969 historic aerial (Figure 20), the numbers on Lot 1 (police and courthouse) have been handwritten in red pen as a later addition and update.

3.2.4.1 Lot 14 (211A Harbour Drive)

22: 'Appropriated for housing purposes. Gaz. 4th December 1964

3.2.4.2 Lot 15 (213 Harbour Drive)

27: Appropriated for Housing purposes. Gaz. 23rd November 1962.

3.2.4.3 Lot 1 (215 and 215A Harbour Drive)

Handwritten on 1971 map:

4: Disposal – Revocation R38291 GF5IH790

8: Aboriginal Land Claim 4636 Refused 4.7.97

16: R.69662 for Future Public Requirements. Notd. 8th November 1940 (the entry has been crossed out in red pen and noted as 'Rev. Gaz 24.12.75)

112: R.38291 for police purposes noted 24.9.1904 – revoked Gaz 16.4.93'

3.2.5 Historical Aerials

The earliest historical aerial of the study area is from 1940 (Figure 14) prior to the subdivision of the land, which indicates the still extant stables. The figure was referenced in Jamison 2011 where it was stated that the twin toilets are obscured by trees in the image.

The next available historical aerial of the study area is from 1969 (Figure 20) after 211 and 213 Harbour Drive were acquired for housing purposes in 1962 and 1964 respectively. As the land was further subdivided in 1962, and the 1940 aerial indicates cleared land, the only potential structural remains on 211A Harbour Drive and 213 Harbour Drive will be from the housing built between 1962 and 1969. Prior to the land being revoked for police purposes and built on, the western portion of the property was structurally designated for the horse grazing paddock. According to the experience of John Orman, horses were still located at the stables during his time at the property until 1954 and in addition corn was grown within the horse paddock when horses were not present.

There may be structures in the northeast corner of the site as indicated between 1940 and 1969 but there are no resources that discuss them and the only separate structures described have been the toilets and horse stables/ foraging room (Figure 14 and Figure 20).

The residential buildings were removed from 211A and 213 Harbour Drive between April and December 2010 and aerial images and site survey indicate that nothing has been built on the study area since. Figure 24 and Figure 25 illustrate the disturbance to the study area in the process of building removal.



Figure 3: Courthouse and Police Station c. 1907 (source Coffs Collections – accession no. CC2022.11.1)

The Courthouse and Police Station is located on the left side of the image, no additional extant buildings are visible at this time



Figure 4: Coffs Harbour infants school 1921 (Source: Coffs Collections, Accession Number. mus07-1733)

This is a picture of the original infants school in 1921, on the site now occupied by the Coffs Harbour High School. The building was later moved to the existing public school and now faces Salamander Street.



Figure 5: Coffs harbour court and police station – 1925 (Source: Coffs Collections, Accession Number. Mus07-857)

The horse paddock fencing is visible in the bottom left corner of the image



Figure 6: Students and teachers assembled at the Coffs harbour public school on high street, c.1925 (Source: Coffs Collections, Accession number. M2022.70.1)



Figure 7: Police station and Courthouse, February 1982 (Source: Coffs Collection accession number. M2022.70.2)



Figure 8: Aerial view of Coffs Harbour Public School, 1990s – (Source: Coffs Collections accession number. Mus07-10743)

Colour photograph of an aerial view of Coffs Harbour Public School, 1990s. Also visible is Brelsford Park, Harbour Drive (formerly High Street)

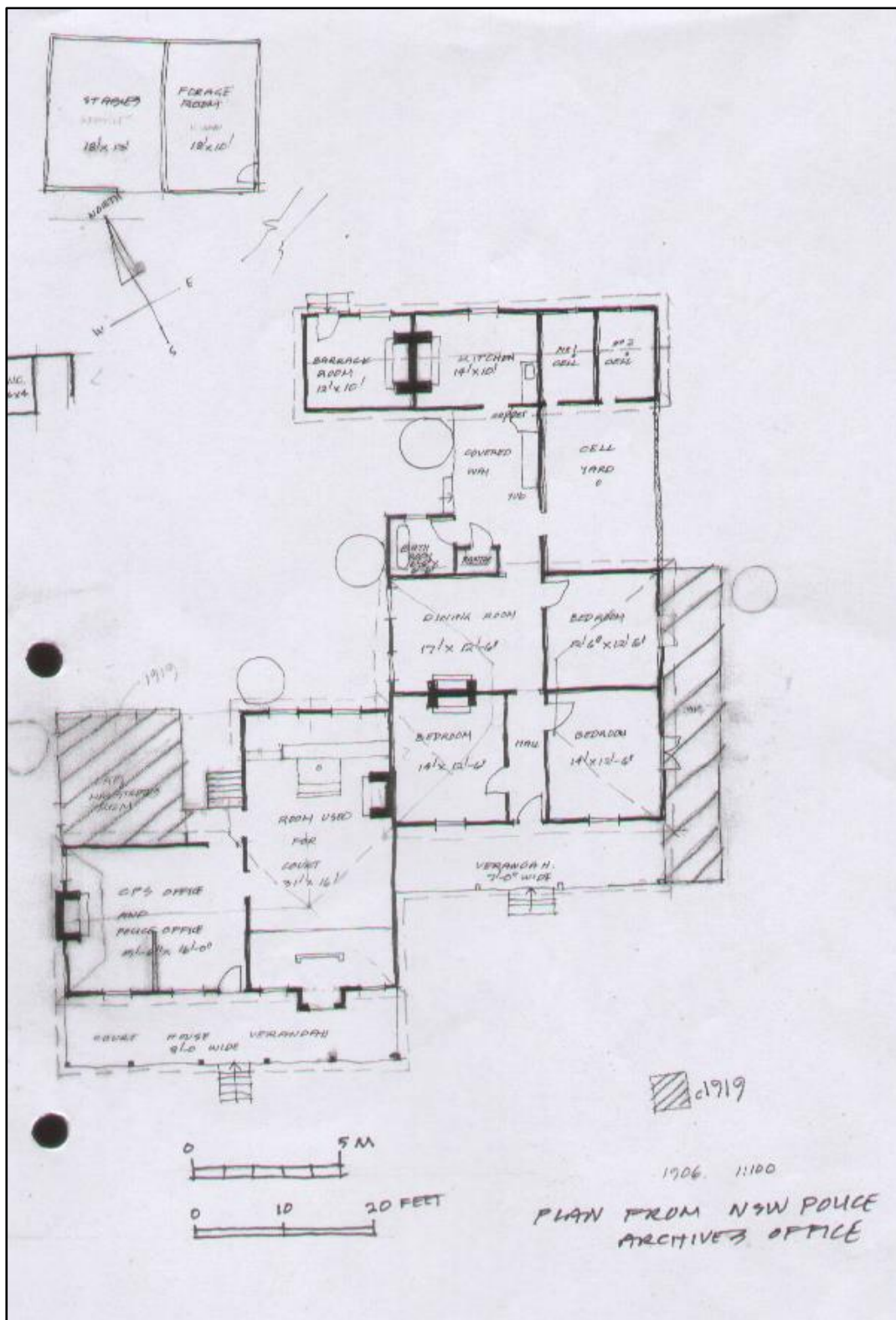


Figure 9: Old Court House, Police Station and Quarters plan from 1906 showing c1919 modifications (Source: Coffs Harbour Library, originally stored in NSW Police Archives Office)

The plan has been done free hand and therefore distance to the Stables is not to scale but the plan does confirm the presence of a stables (18 feet x 18 feet, approximately 30 square metres) and forage room (18 feet x 10 feet, approximately 16.66 square metres) from 1906 to the north of the courthouse. An additional structure is indicated to the east of the rear of the courthouse (6 feet x 4 feet approximately 2.2 square metres); however, the use is unlabelled in this plan.

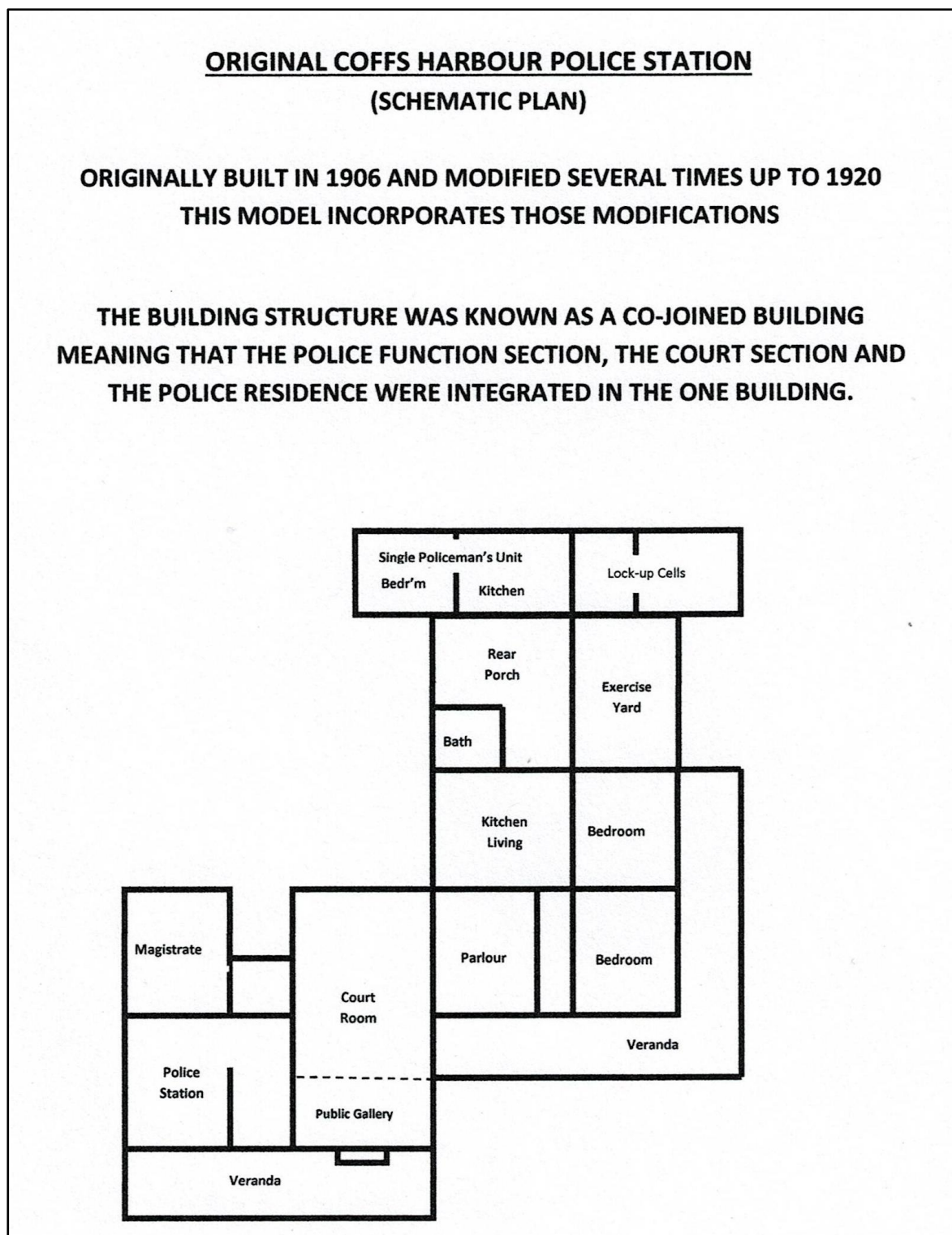


Figure 10: Original Coffs Harbour Police Station (schematic plan) (Source: Coffs collections accession number. M2020.27.1)

This schematic plan was provided in addition to a model of the Historical Coffs Harbour Courthouse and Police Residence created by Don Langley in 2019-2020. It does not indicate what and when modifications to the building were conducted between 1906 and 1920 or where structures were located to the back of the property but is consistent with the rooms indicated in Figure 9.

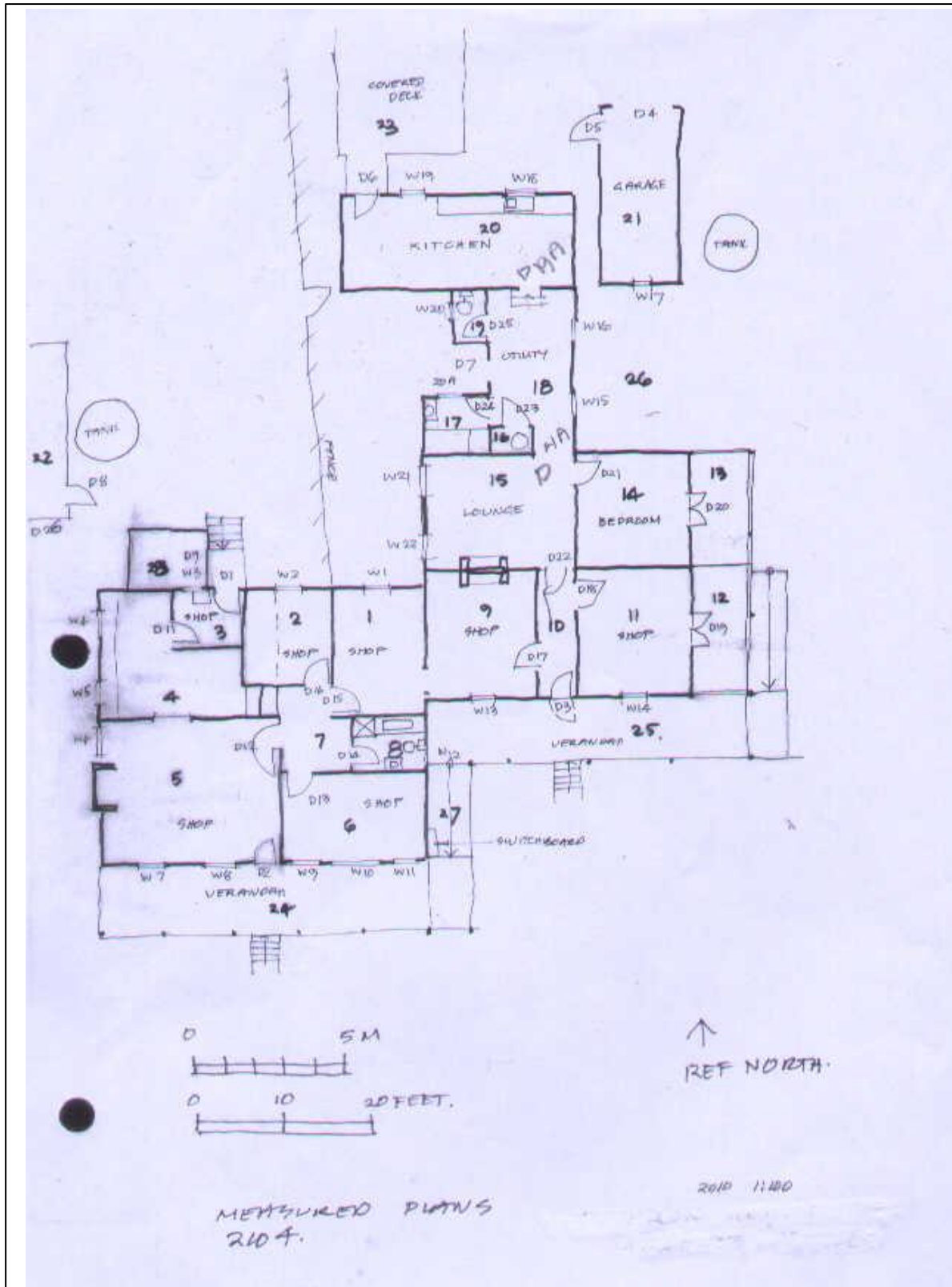


Figure 11: Old Court House, Police Station and Quarters measured plans (Source: Coffs Harbour Library, 2010)

This plan includes the fence line angle which is still extant to the north of the property.



Figure 13: 1912 Parish of Coff map (Source: Historic Land Records Viewer)

Transcript: CH16 - R38291 fr. Sale and R38292 fr Lse Gen for Police Purposes – Notified 24th Sept '04.



Figure 14: 1940 aerial overlay (Source: Australian Government Historical aerial explorer)

The 1940 aerial indicates that there is an additional structure located to the back of the courthouse property, that is consistent with the location and description of the study area, the associated ground disturbance in proximity confirm research that the study area was used for horse grazing. In addition, Jamison 2011 indicated that 'the outside toilet site is hidden under trees' which matches the location of extant cement block within the study area.

Final report Statement of Significance, Old Court house/police/station/residence, Harbour Drive, Coffs Harbour

Notation plan

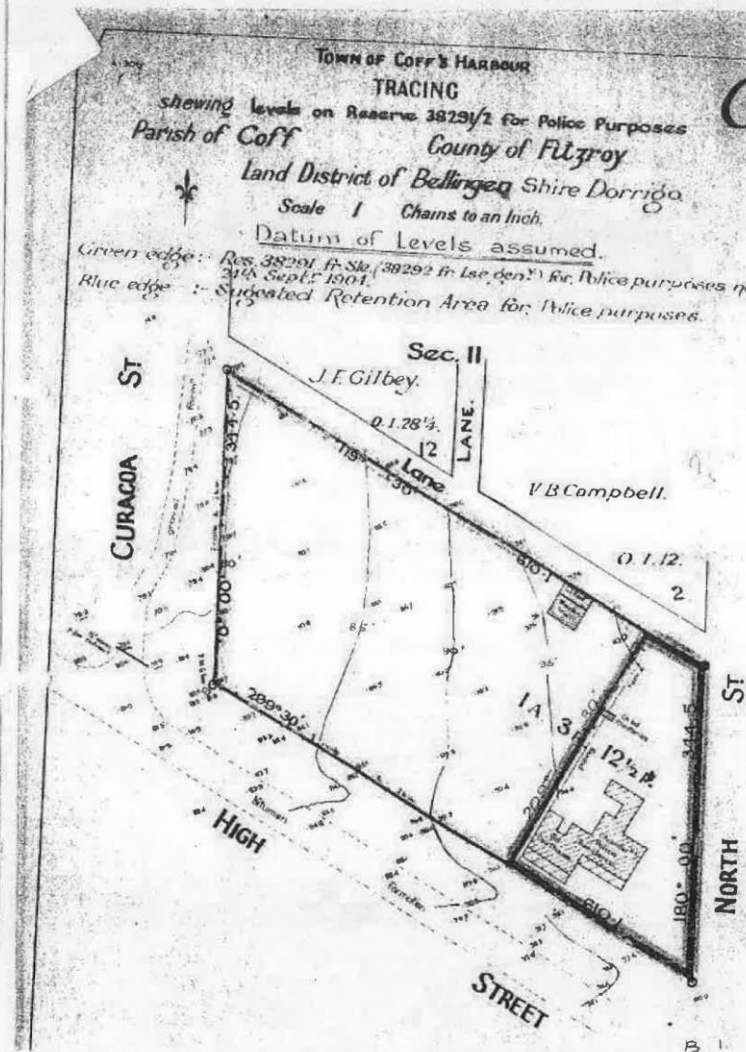


IMAGE 15.
NOTATIONAL SUBDIVISION PLAN c1954.
not proceeded with, showing location of original site, stables, twin
toilets, west paling fence and building footprint.

Jamison architects Pty. Ltd.

Job no 10.18

page 41

Figure 15: Notational subdivision plan c1954 (Jamison architects Pty Ltd 2011)

As stated in the notational subdivision plans the original site, stables, and twin toilets are located separate to the main structure. Although the subdivision plans were not confirmed, the location of the additional structures confirms research which indicates that twin toilets and stables associated with the listed heritage item were located within the current study area boundary.

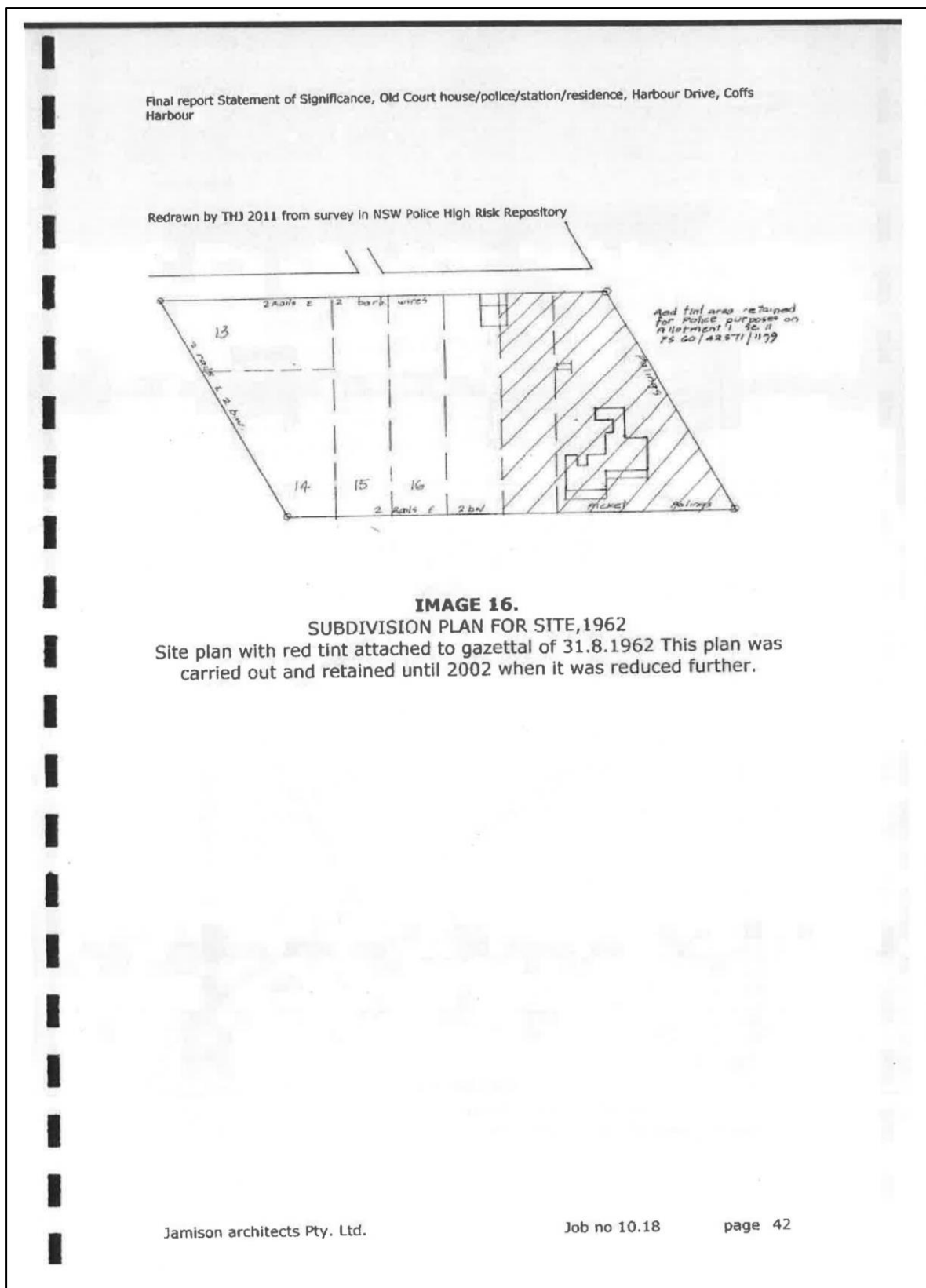


Figure 17: Subdivision plan for site, 1962

The land was only subdivided from 1962, according to aerial image (Figure 20) building structures were not included on the west of the site until between 1962 and 1969 therefore any built structural remains from housing development will not reach local threshold, the location to the west was for cattle grazing and the additional structure to the north is assessed to be the referenced twin toilets.

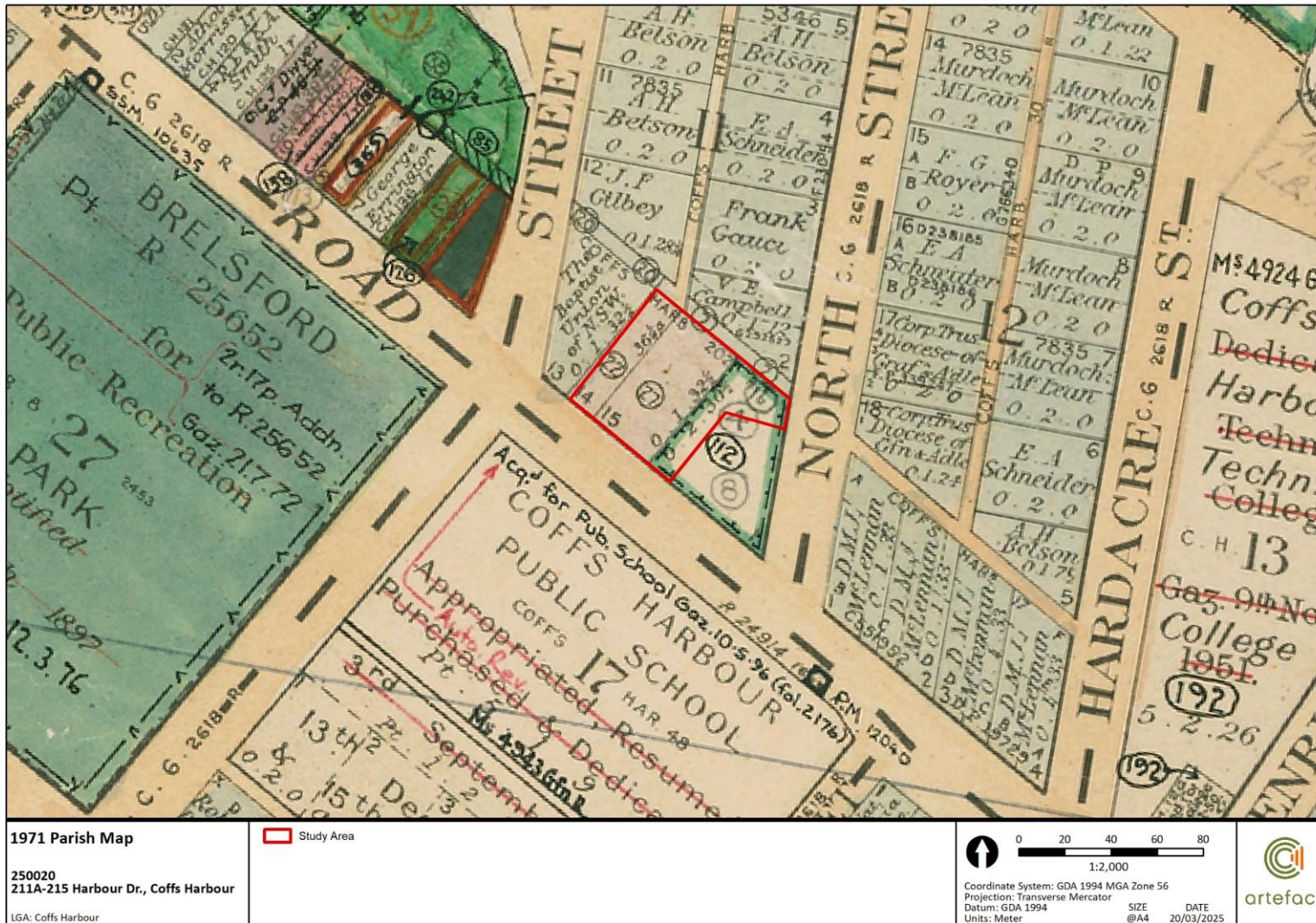


Figure 18: 1971 Coff Parish Map (Source: Historic Land Records Viewer)

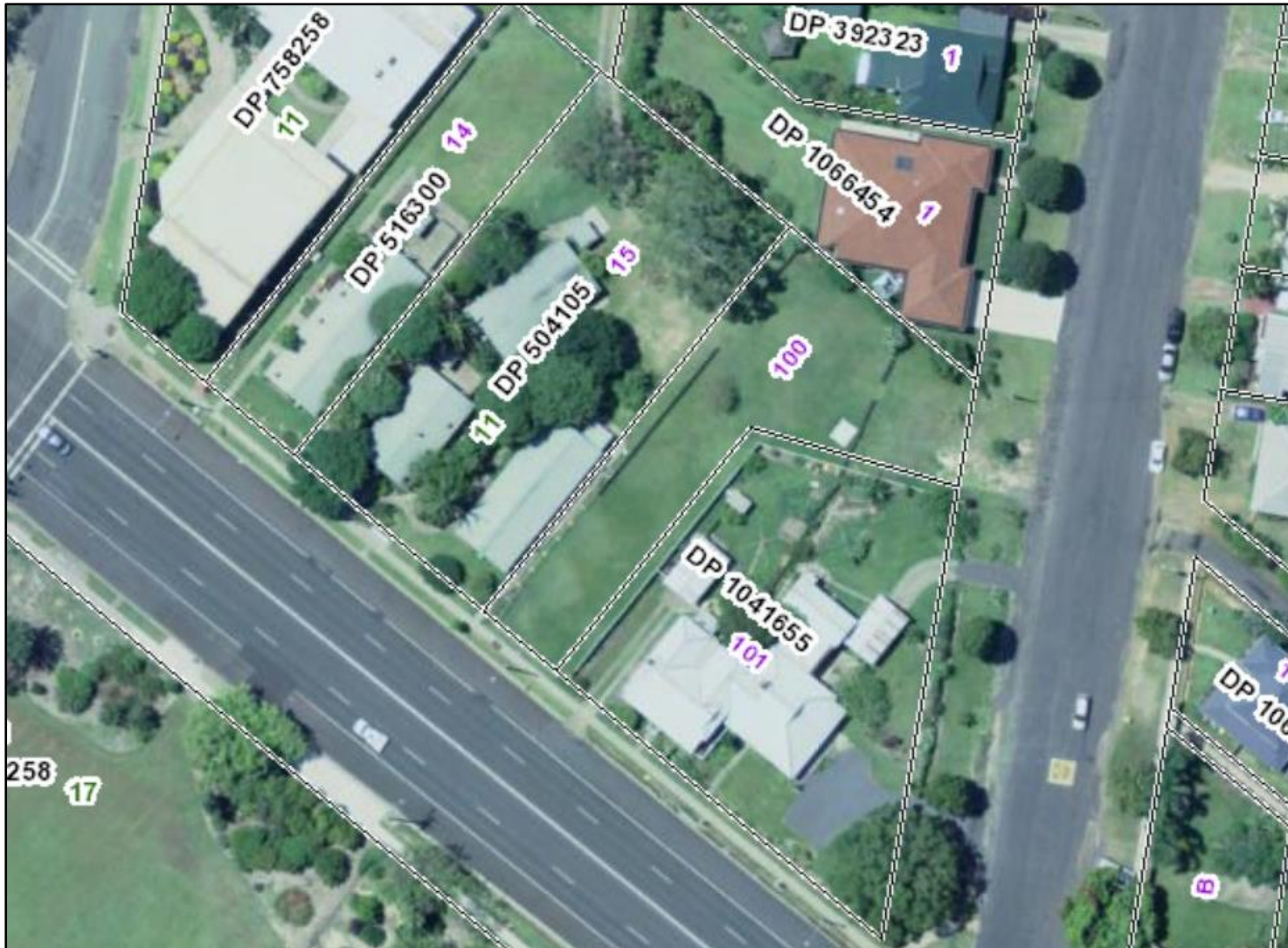


Figure 19: Lot boundaries indicating the shared Lot number of DP 1041655 across 215 (study area) and 215a (LEP I24) (source: SIX MAPS)
Further subdivision of the property occurred in 2002 dividing the greater 215 Harbour Drive into 215 and 215A Harbour Drive.



Figure 20: 1969 aerial overlay (Source: Spatial Collaboration Historical Imagery Viewer)



Figure 21: 1974 Aerial Overlay (Source: Spatial Collaboration Historical Imagery Viewer)



Figure 22: 1989 Aerial Overlay (Source: Google earth)



Figure 23: 2004 Aerial Overlay (Source: Google earth)



Figure 24: March 2008 Harbour Drive Street view northeast of study area (Source: Google Street view)

Courthouse entrance and garage is visible on the right of the image including the unimpacted portion of land 215 Harbour Drive.



Figure 25: 2010 Harbour Drive Street view northeast of study area (Source: Google Street view)

This image illustrates the cut into the landscape after the demolition and removal of the buildings on 211A and 213 Harbour Drive.



Figure 26: 2010 Aerial Overlay (Source: Google earth)



Figure 27: 2010 helicopter photo

Image indicates the existing fence line and outback foundation within the current study area boundary

4.0 PHYSICAL CONTEXT

4.1 Site Inspection

A site inspection was conducted on 2 April 2025 by Katherine Douglas (Graduate Heritage Consultant) and Samuel Sammut (Senior Heritage Consultant) of Artefact Heritage. The aim of the site inspection was to inspect the area of proposed impacts, inform a preliminary assessment of archaeological potential, and to identify heritage items and heritage significant fabric of the item and in the vicinity that may be affected by the project. The inspection was undertaken on foot and a photographic record was made.

4.1.1 Study area

The only structural remains visible in the study area is a cement structural foundation approximately 2 x 2 metres with gravel and brick inclusions along the perimeter (Figure 31). This structural foundation is in the vicinity of the original twin toilets established on the site as indicated in Figure 15. In addition, remains of existing fence lines are located within the 215 Harbour Drive lot and the boundary between 215 and 213 Harbour Drive (Figure 29, Figure 30 and Figure 33).

Disturbance to the site is visible along the length of the boundary between 215 and 213 Harbour Drive where the landscape has been cut into as visible in Figure 33. Patches of ground visibility were identified within grassed areas, where clay and imported gravels were observed which indicates disturbance in the northwestern portion of the study area (Figure 40 and Figure 41).



Figure 28: View northwest from side entrance to study area



Figure 29: View northwest within study area of existing fence lines and cement foundation to rear of courthouse and police station boundary



Figure 30: view of existing fenceline extending from the courthouse as was visible in Figure 14 and Figure 19



Figure 31: View of cement foundation with brick lining



Figure 32: view northeast of property line abutting boundary of police station and courthouse- ranging pole to indicate gentle downward slope of the property



Figure 33: View east of existing fenceline dividing lot 15 and 100 indicating landscape modification and levelling



Figure 34: view southeast from boundary between lot 13 and 100 to extant fencing. Stables would have been located to the left of the fenceline



Figure 35: indication of subsurface works in proximity to existing fencelines



Figure 36: View south of extant wooden fencing and metal fence bounding current extent of historical courthouse and police station land plot



Figure 37: view of disturbance at front of site abutting Harbour Drive road



Figure 38: View southwest to lot 13 and 15 front access of property abutting Harbour Drive Road.



Figure 39: View northwest to lot 13 and 15 back of property boundary lines



Figure 40: view stone foundation around garden beds in 213 Harbour Drive in proximity to no longer extant housing structures



Figure 41: view of clay exposure towards Harbour Drive entrance to site

4.1.2 View to and from Heritage items in the surrounding area

View to and from Coffs Police Station and Courthouse (listing numbers I15 and I25)



Figure 42: View from western boundary of I25 to study area and I15 heritage item



Figure 43: View south from within study area to rear of courthouse and police station and boundary fence.



Figure 44: View southeast of I15 Courthouse from within study area (lot 100)



Figure 45: View southeast from study area entrance to northwest face of extant courthouse boundary



Figure 46: view south from study area to I15, obscured by extensive tree cover



Figure 47: view southwest from study area entrance to I15 obscured by tree cover



Figure 48: view west of the I25 boundary, the school is obscured by extensive trees along the boundary of the registered heritage item



Figure 49: View west down Harbour Drive Road and the corner of I25 school boundary (left of image)



Figure 50: view northwest towards study area and heritage item I15 from boundary of I25 heritage item



Figure 51: View east from furthest boundary of I25 back to study area



Figure 52: view southeast from end of block toward study area (on left) and I25 (on the right of the image)

5.0 SIGNIFICANCE ASSESSMENT

5.1 Methodology

Determining the significance of heritage items or a potential archaeological resource is undertaken by utilising a system of assessment centred on the *Burra Charter* (Australia ICOMOS 2013). The principles of the charter are relevant to the assessment, conservation and management of sites and relics. The assessment of heritage significance is outlined through legislation in the *Heritage Act* and implemented through the *NSW Heritage Manual*, the *Archaeological Assessment Guidelines*³² and the document *Assessing Significance for Historical Archaeological Sites and 'Relics'*.³³

If an item meets one of the seven heritage criteria and retains the integrity of its key attributes, it can be considered to have heritage significance (see Table 3). The significance of an item or potential archaeological site can then be assessed as being of local or State significance. If a potential archaeological resource does not reach the local or state significance threshold, then it is not classified as a relic under the *Heritage Act*.

'*State heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to the State in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

'*Local heritage significance*', in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.³⁴

Table 3. NSW heritage assessment criteria

Criteria	Description
A – Historical Significance	An item is important in the course or pattern of the local area's cultural or natural history.
B – Associative Significance	An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.
C – Aesthetic or Technical Significance	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.
D – Social Significance	An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.
E – Research Potential	An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.
F – Rarity	An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.

³² NSW Heritage Office 1996, 25-27.

³³ NSW Heritage Branch 2009.

³⁴ This section is an extract based on the Heritage Office *Assessing Significance for Historical Archaeological Sites and Relics* 2009:6.

Criteria	Description
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G - Representativeness	An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places of cultural or natural environments (or the cultural or natural history of the local area).
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5.2 Integrity

Integrity relates to whether all the attributes that convey heritage significance are extant within the subject site and not eroded or under threat³⁵. Integrity is a measure of the wholeness and intactness of the place and its attributes. Examining the conditions of integrity, therefore requires assessing the extent to which the subject site or element:

- a) includes all elements necessary to express its heritage significance;
- b) is of adequate size to ensure the complete representation of the features and processes which convey the property's heritage significance;
- c) suffers from adverse effects of development and/or neglect.

Table 4: Levels of Integrity

Level	Definition
High	The physical fabric of the property and/or its significant features is in good condition, and the impact of deterioration processes controlled. A significant proportion of the elements necessary to convey the totality of the heritage significance conveyed by the property is included ³⁶ .
Moderate	The physical fabric of the property and/or its significant features have undergone some modifications. The changes may be reversible.
Low	The physical fabric of the property and/or its significant features have undergone substantial modifications and the original is irretrievable
N/A	Modern and / or intrusive fabric
Unknown	Elements that cannot be evaluated (ie. natural ventilation systems where their continued operation cannot be determined, fabric that cannot be inspected)

³⁵ Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS 2011, p10.

³⁶ Sheridan Burke, The long and winding road: a challenge to ICOMOS members, in *Changing World, Changing Views of Heritage: heritage and social change* ICOMOS, 2010

5.3 Existing heritage assessments

The following sections outline the significant values of statutory heritage items in the vicinity of the study area and proposed works.

5.3.1 Former Police Station and Courthouse (LEP no. I15)

5.3.1.1 Statement of Significance

The following statement of significance is extracted from the item's LEP listing on the NSW State Heritage Inventory (SHI):

The former courthouse and police station on Harbour Drive is of high local significance in demonstrating the growth of Coffs Harbour and the administration of law and justice in the early years of the twentieth century. It is one of several early police buildings in Coffs Harbour and surrounding districts, which correspond to the provision of police and courtroom facilities. It is a very good representative and intact example of the work of Walter Liberty Vernon as NSW Government architect.

It is of high local significance as a high-quality, all-timber public building in a simplified Arts and Crafts style. Built in stages over several decades according to changes in policing and changes of use, the building retains its original 1906 co-joined form with later sensitively done additions. While simple in design and construction, the building is an elegant example of a country police station and courthouse, prominently located and displaying high-quality internal and external joinery and details. Later changes by the NSW Govt Architects office to alter and enlarge the building are in a similar, well-considered style. The current site retains a portion of its original surrounding land, which continues to form a garden setting for the building.

The building is situated on a rise overlooking Harbour Drive which is one of the city's main thoroughfares. It lies opposite Coffs Harbour Primary School, one of the earliest in the area. It is highly visible in both directions along Harbour Drive and is a very well-known historic building, making it a local landmark.³⁷

5.3.1.2 Assessment of Significance

The following assessment of significant values has been extracted from the NSW SHI. Quoted text is italicised, whereas Artefact additions are not.

Table 5. Heritage significance assessment for the Former Police Station and Courthouse

Criteria	Discussion
A) Historical Significance	<i>The former courthouse and police station on Harbour Drive is of high local significance in demonstrating the growth of Coffs Harbour and the administration of law and justice in the early years of the twentieth century. It is one of several early police buildings in Coffs Harbour and surrounding districts, which correspond to the provision of police and courtroom facilities. The choice of location midway between the Jetty and the Top Town indicates</i>

³⁷ DCCEE SHI, *Courthouse and Police Station (former)*, accessed online 28 May 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/View/Item?itemId=1360241>

Criteria	Discussion
	<p><i>the original rivalry that existed between the two early Coffs Harbour settlements and explains its early demise as a police station and courthouse as more convenient locations at both the Jetty and Top Town were eventually required. Following its completion, courtroom functions were transferred from Coramba in 1907.</i></p> <p><i>While in use for a short period of time, the building remains substantially intact and is clearly able to demonstrate its early function as a court house, police station and residence. The residence was used for police accommodation for over 60 years.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
B) Associative Significance	<p><i>A representative and intact example of the work of Walter Liberty Vernon while working as the NSW government architect.</i></p> <p>The item has heritage significance due to its association with a prominent figure in NSW's architectural history.</p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
C) Aesthetic Significance	<p><i>Of high local significance as a high-quality, all-timber public building in a simplified Arts and Crafts style. Built in stages over several decades according to changes in policing and changes of use, the building retains its original 1906 co-joined form with later sensitively done additions.</i></p> <p><i>The building is situated on a rise overlooking Harbour Drive which links Coffs Jetty to Top Town and is one of the city's main thoroughfares. It also lies opposite Coffs Harbour Primary School, one of the earliest in the area. It is highly visible in both directions along Harbour Drive and is a very well-known historic building, making it a local landmark. It retains a portion of its original surrounding land, which continues to form a garden setting for the building.</i></p> <p><i>While simple in design and construction, the building is an elegant example of a country police station and courthouse, prominently located and displaying high-quality internal and external joinery and details. Later changes by the NSW Govt Architects office to alter and enlarge the building are in a similar, well-considered style.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
D) Social Significance	<p><i>Of high local significance to the Coffs Harbour community as a well-known local landmark. The decision by the Coffs Harbour City Council to buy the building in 2010 and convert it to use as the Coffs Regional Museum, returning the building to public care and ownership, indicates the very high level of community esteem in which the building is held and its importance to the history of Coffs Harbour. It forms part of the identity of Coffs Harbour.</i></p> <p>It should be noted that in 2022 the Regional Museum moved to a new location at 31 Gordon Street in Coffs Harbour, where it now operates under the name Yarrila Arts and Museum.³⁸ A chiropractic practice now occupies</p>

³⁸ Coffs Coast Heritage, March 2022, *A brief history of the Regional Museum*, accessed online via [A brief history of the Regional Museum – Our stories](#)

Criteria	Discussion
	<p>the building. In spite of the relocation of the Regional Museum, the building retains its social significance value as a landmark for the local community.</p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
E) Research Potential	<p><i>Able to reveal information about early twentieth century police and courtroom buildings, accommodation and procedures, as well as information on early twentieth century timber public buildings.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
F) Rarity	<p><i>Rare within the Coffs Harbour local government area and of high local significance. There is a similar co-joined weatherboard courthouse and police station at Coramba (1896) and former weatherboard police stations at Coffs Jetty (1920, now a private residence) and Woolgoolga (1891, now the Community Centre). Other co-joined weatherboard courthouse and police stations built at the same time survive at Cooperook (1900), Dorrigo (1904), and Mullumbimby (1908).</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
G) Representativeness	<p><i>A good representative example of a co-joined weatherboard courthouse and police station built by the NSW Govt Architect within the Coffs Harbour local government area and of high local significance.³⁹</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>

Summary for significant criteria

The Former Police Station and Courthouse item has heritage significance at the local level for its historic, associative, aesthetic, social, rarity and representative values, as well as its architectural research potential.

5.3.2 School - Coffs Harbour Public - weatherboard buildings (LEP no. I25, Dept. of Education S170 Register)

5.3.2.1 Statement of Significance

The following statement of significance is extracted from the item's LEP listing on the NSW State Heritage Inventory (SHI):

The group of timber school buildings at Coffs Harbour Public School are of high local significance as early weatherboard school buildings that demonstrate the evolution of public education in the Coffs Harbour area over the last century. They display the predominate use of local hardwood that characterises the first phases of Coffs Harbour's development. The buildings and site are held in high esteem by families and former students. The school is prominently located on a main

³⁹ DCCEEW SHI, *Courthouse and Police Station (former)*, accessed online 28 May 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/View/Item?itemId=1360241>

*thoroughfare and is a well-known landmark and contributes to Coffs Harbour's sense of place.*⁴⁰

5.3.2.2 Assessment of Significance

The following assessment of significant values has been extracted from the NSW SHI.

Table 6. Heritage significance assessment for the Coffs Harbour Public School

Criteria	Discussion
A) Historical Significance	<p><i>Coffs Harbour Public School is of high local significance in providing evidence of the evolution of public school education in the Coffs Harbour central area over almost the last century. It is amongst the earliest schools in the Coffs Harbour LGA.</i></p> <p><i>The school is located opposite the former Police Station and Court House on Harbour Drive, another important early timber building by the NSW Government Architect, and together these buildings form a significant precinct of sites important in demonstrating the early development of Coffs Harbour.</i></p> <p><i>The Coffs Harbour Public School is one of a group of similar school buildings built to standard NSW Govt designs across the LGA within a short period of time that demonstrate the rapid development of Coffs Harbour and district in the early decades of twentieth century. They display the predominate use of local hardwood that characterises the first phases of Coffs Harbour's development and together form an important group of early surviving buildings.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
B) Associative Significance	<p>This item does not reach the threshold for local significance under this criterion.</p>
C) Aesthetic Significance	<p><i>High local significance for the quality and representativeness of its early timber school buildings as the work of the NSW Government Architect in the period before WWI. Timber was the predominant building material in the early days of Coffs Harbour's development and these weatherboard school buildings have, over time, acquired a picturesque appeal.</i></p> <p><i>Several buildings are highly visible on a rise overlooking Harbour Drive, one of the main thoroughfares of Coffs Harbour. They form a prominent local streetscape and are a local landmark. The mature trees on the site may be remnant bushland and of high significance</i></p> <p>The item reaches the threshold for local heritage significance under this criterion..</p>
D) Social Significance	<p><i>Coffs Harbour Public School is of high local significance in being held in high esteem by families and former students as a place of education and childhood memories. The school is an important component of the present-day Coffs Harbour community's sense of place.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>

⁴⁰ DCCEE SHI, *School - Coffs Harbour Public - weatherboard buildings*, accessed online 28 May 2025 via <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=1360155>

Criteria	Discussion
E) Research Potential	<p><i>Coffs Harbour Public School is of local significance having unique potential to contribute to a greater understanding of the evolution of public education in the area. In this respect, the site and buildings have benchmark and thus, regional (potentially state) technical significance.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
F) Rarity	<p><i>Coffs Harbour Public School is rare within the Coffs Harbour local government area as a large collection of intact early timber school buildings on the one site.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>
G) Representativeness	<p><i>Good representative examples of Federation/pre WWI NSW government school buildings within the Coffs Harbour LGA. The buildings form a highly significant group of similar timber school buildings within the LGA.</i></p> <p>The item reaches the threshold for local heritage significance under this criterion.</p>

Summary for significant criteria

The former has heritage significance at the local level for its historic, aesthetic, social, rarity and representative values, as well as its research potential.

5.4 Archaeological potential

The following section assesses the study area's potential to contain historical archaeological resources. The potential for the survival of archaeological remains is significantly affected by activities which may have caused ground disturbance. This assessment is therefore based on consideration of current ground conditions, and analysis of the historical development of the study area.

'Archaeological potential' refers to the likelihood that an area contains physical remains associated with an earlier phase of occupation, activity or development of that area. This is distinct from 'archaeological significance' and 'archaeological research potential'. These designations refer to the cultural value of potential archaeological remains and are the primary basis of the recommended management actions included in this document.

The archaeological potential of each site is presented in terms of the likelihood of the presence of archaeological remains, considering the land use history and previous impacts at the site. This evaluation is presented using the following grades of archaeological potential:

Table 7: Grading of archaeological potential

Grading	Rationale
Nil	No evidence of historical development or use, or where previous impacts would have removed all archaeological potential

Grading	Rationale
Low	Research indicates little historical development, or where there have been substantial previous impacts, disturbance and truncation in locations where some archaeological remains such as deep subsurface features may survive
Moderate	Analysis demonstrates known historical development and some previous impacts, but it is likely that archaeological remains survive with some localised truncation and disturbance
High	Evidence of multiple phases of historical development and structures with minimal or localised twentieth century development impacts, and it is likely the archaeological resource would be largely intact

5.4.1 Land use summary

The European occupation of the study area has been divided into four general phases of historical activity, which are outlined in Table 8 below:

Table 8: Land use summary

Phase	Discussion
<p>Phase 1: Establishment and use of the Courthouse and Police Station and associated structures (1906-1930)</p>	<p>Historical activities</p> <ul style="list-style-type: none"> The land was gazetted for police purposes on 24th September 1904. The original layout of the combined courthouse and police station building was completed in 1907 (it is assumed that the outside toilets, horse stables, foraging room and paddock were established at the same time. Plans for the building were created by Government Architect W.L. Vernon In 1919 additional works were conducted to the building using a plan by NSW Government Architects Office. In 1929 the lock ups and exercise yard were moved (they were close to the house and not in the study area) and the paddock reservation for police purposes was cancelled. The actual building itself was vacated in 1930 for a new police station and courthouse which had been established. <p>Potential archaeological remains</p> <ul style="list-style-type: none"> Potential archaeological remains associated with Phase 1 would be associated with the original toilets, horse stables, foraging room and paddock. There is potential for rubbish pits
<p>Phase 2: Vacancy and function as residential flats (1930 – 1962)</p>	<p>Historical activities</p> <ul style="list-style-type: none"> The vacated courthouse was rented in 1932 to the department of agriculture but only for a short time and then remained vacant. The police station was regularly in use as police residence The stables were intact between 1930 and 1954, and an additional set of items were visible to the northeast of the study area (as indicated in 1940 aerial). <p>Potential archaeological remains</p> <ul style="list-style-type: none"> Same as Phase 1

Phase	Discussion
	<ul style="list-style-type: none">Any additional remains would be associated with residential use and corn growing from tenants
Phase 3: Subdivision of land portions, demolition of additional structures and housing builds (1962 – 2010)	<p>Historical activities</p> <ul style="list-style-type: none">The entire study area portion was subdivided between 1954 and 1962Between 1962 – 1969 housing structures were built on what is now 211A and 213 Harbour Drive.No stables are visible in 1969 aerial and is instead replaced by the new housing (therefore the stables were demolished between 1954 and 1969) and a potential structure is located the northeast corner of the site.In 2000 High Street was renamed to Harbour DriveFurther subdivision of courthouse/ police station land occurred in 2002 – the courthouse and police station residence was divided into lot 100 and 101, therefore separating the remains of the outdoor twin toilets from the study heritage item <p>Potential archaeological remains</p> <ul style="list-style-type: none">Additional residential remains, including structural remains associated with the housing infrastructure established between 1962-1969
Phase 4: Demolition of housing, site vacancy, further subdivision and establishment of the heritage significance of the courthouse and police station (2010 – present)	<p>Historical activities</p> <ul style="list-style-type: none">Housing structures within 211A and 213 Harbour Drive were demolished between April and December of 2010The Courthouse/ police station was sold for antique shop and residence – 2004 -2010Courthouse police station vacant and purchased for use as a museum in 2011 - 2022The courthouse is currently used as a chiropractic; no additional structures have been built within the study area since 2013.No furtherPotential levelling in either the building of the 211 and 213 structures or in the destruction of the structures. <p>Potential archaeological remains</p> <ul style="list-style-type: none">Nil – No additional structures have been built within the study area during this time according to historic records of sale, aerial images and site survey

5.4.2 Relevant investigations

Jamison architects Pty. Ltd. (2011) Statement of Heritage Significance Old Courthouse and police residence 215 Harbour Drive, Coffs Harbour

The Statement of Heritage Significance report determined that the extant police residence in Harbour Drive, Coffs Harbour is of local significance because

It has an important association with the significant early 20th century growth of the town and district.

The conjoined building, built in 1906, still has the ability to demonstrate this form and its 1919 planned expansion

The buildings unusual loss of court and police function in 1930 demonstrates the ascendancy of Coffs Harbour Top town over the Jetty and a difference between the two settlements that lasted into the 1970's.

It is a landmark building, in an English Arts and Crafts style adapted for the Australian environment, largely intact, designed under W.L. Vernon, Government Architect and a rare early 20th century of significance in the Shire.

The boundaries of 215 Harbour Drive (not including the study area) were assessed and determined to have low archaeological potential. It was recommended that investigation occur within the heritage item boundary specifically on the exercise yard service remnants and perimeter and any items that may remain under the house as evidence of the early fabric of the building.

It was determined that part of the site had poor integrity due to the loss of the original site with horse paddock, fencing, stables and outside toilets which was located in land divided from the heritage item in 2002 (the remains of which are located within the current study area).

5.4.3 Summary of historical archaeological potential

Based on the review of the information obtained from historical sources, previous heritage reports and the current condition of the site, it can be concluded that the study area has potential to contain historical archaeological remains associated with the Coffs Harbour Court house and Police station.

The graphic representation of the site's archaeological potential is presented in Figure 53. A major portion of the study area has been determined as having nil-low potential due to the residential building and removal within this area. The portion immediately adjacent to the current boundary of the Coffs Harbour Police Station and Courthouse has been determined to have low-moderate potential. This determination is based on the proximity to the heritage listed Police Station and Courthouse and less disturbance as well as the location of the stables, foraging room, toilets, and potential cisterns.



Figure 53: Indicative representation of historical archaeological potential

Nil-low potential indicated in orange – due to the impact to the study area from the residential buildings

Low –Moderate potential indicated in blue – due to the location of the stables, toilets and proximity to the courthouse/ police station

5.5 Archaeological significance

The significance assessment of historical archaeological sites and items requires a specialised framework in order to consider the range of values associated with each site/item. This because of the challenges associated with the often-unknown nature and extent of buried archaeological remains and judgment is usually based on anticipated attributes.

To facilitate assessment of archaeological significance, the NSW Heritage Branch (now Heritage NSW) arranged the seven heritage criteria into four groups (see below). The value of archaeological sources primarily lies in their research potential or the ability to provide additional information about site/item that is not contained in historical records. The assessment of archaeological research potential is augmented by additional three questions posed by Bickford and Sullivan⁴¹. The following significance assessment of the study area's potential archaeological remains has been carried out by using these criteria as outlined in the *Assessing Significance for Historical Archaeological Sites and 'Relics'*.

5.5.1 NSW Heritage criteria for assessing significance related to archaeological sites and relics

5.5.1.1 Archaeological research potential (NSW Criterion E)

Potential archaeological remains associated with the early development of the functioning courthouse and police station and associated structures. If substantially intact and *in situ* archaeological remains associated with Phases 1-2 are identified, then the archaeological resource will reach the threshold for **Local significance**

5.5.1.2 Association with individuals, events or groups of historical importance (Criteria A, B & D)

The potential archaeological remains would have local significance for demonstrating early 20th century law enforcement infrastructure and greater layout of law enforcement land. The original structure plans were designed in the Government Architect's office under W. L. Vernon who was the Government's head architect between 1890 and 1911.

5.5.1.3 Aesthetic of technical significance (Criterion C)

The archaeological remains may have some interpretive value in spatial layout of early police and courthouse in smaller towns.

5.5.1.4 Ability to demonstrate the past through archaeological remains (Criteria A, C, F & G)

The early 20th-century remains of a Mounted Police paddock and stable in Coffs Harbour are assessed as possessing local archaeological significance for their potential to contribute to an understanding of the spatial development and policing infrastructure of the area. While associated with the broader historical landscape of an SHR-listed site, they fall outside the SHR curtilage and are not themselves listed. The archaeological resource is considered not significant enough to warrant in-situ retention. Stables and paddocks are not rare site types under criteria F (rarity) and therefore would only hold value in their representation of regional police facility layout.

⁴¹ Anne Bickford and Sharon Sullivan, 'Assessing the Research Significance of Historic Sites', in *Site Surveys and Significance in Australian Archaeology*, ed. Sharon Sullivan and Sandra Bowdler (Canberra: Research School of Pacific Studies, ANU, Canberra, 1984), 19–26.

5.5.2 Bickford and Sullivan's questions

Historical archaeological assessment also necessitates a discussion of research potential, as distinct from the potential remains to be present. The significance of an archaeological site is intrinsically linked to the level of scientific research potential it retains. Bickford and Sullivan state:⁴²

A site or resource is said to be scientifically significant when its further study may be expected to help answer questions. That scientific significance is defined as research potential."

To guide the assessment of research potential for archaeological sites, Bickford and Sullivan posed a series of questions which now form part of the standard assessment of archaeological significance in NSW. Due to the levels of archaeological potential assessed within the study area, only one of these questions has been addressed below:

5.5.2.1 Is this knowledge relevant to general questions about human history or other substantive questions relating to Australian history, or does it contribute to other major research questions?

The potential archaeological resource associated with the courthouse and police station including horse paddock, stables, foraging room and other associated structures remains within the study area have the potential to contribute to local history only as they fit into a broader narrative of early regional town infrastructure and development. The land where the study area sits on and the adjacent court house are part of the local development of the region, but other conjoined police and judicial buildings were reasonably common in the North Coast including at Coramba (1896), Coopernook (1900), Dorrigo (1904) and Mullumbimby (1908) which were all designed under the government architect W.L.Vernon.

5.5.3 Summary statement of archaeological significance

Phases 1 – 2 (1906-1962)

The study area has been assessed as having low-moderate potential to contain historical remains from Phase 1-2, spanning from 1906-1962. These phases of occupation are associated with the heritage item old courthouse and police station. If considerably intact and *in situ* archaeological remains definitively associated with the police station and courthouse (including the stables, foraging room and twin toilets) they would reach the threshold for significance at a Local level. Should substantial archaeological remains from these phases survive they may have research potential for their ability to yield information regarding courthouse and police station development in regional towns.

Phase 3 – 4 (1962 to present)

The later Phase 3 and 4 is represented by residential infrastructure remains after further subdivision of the land from the latter 1960's, which would not meet the threshold for archaeological significance.

⁴² Bickford and Sullivan 1984, p.22-24

5.6 Summary of historical archaeological potential and significance

This archaeological assessment has identified low-moderate potential for historical archaeological remains of local significance, including horse paddock stables and toilets associated with the Courthouse and police station. These remains are summarised in Table 9.

Table 9: Historical archaeological potential and significance

Phase	Anticipated remains	Potential for survival	Significance
Phase 1 (1906 – 1930)	Remains of Horse Stables/ paddock and structures associated with the heritage listed courthouse and police station	Low-Moderate	Local
Phase 2 (1930 – 1962)	Remains of Horse Stables/ paddock and structures associated with the heritage listed courthouse and police station	Low-moderate	Local
Phase 3 (1962 – 2010)	Remains of housing built in 211A, 213 and northeast of 215 Harbour Drive between 1962 and 1969 demolished in 2010(including extant fence lines on the boundary of 213 and 215 and within 215 Harbour Drive boundaries)	Low-Moderate	Nil
Phase 4 (2010 to present)	No additional extant structures have been added to the study area	Nil	Nil

6.0 THE PROPOSED WORKS

6.1 The proposed works

The following sections outline the parameters of the proposed development, including different options being considered.

6.1.1 The proposal

The proposed works consist of a residential development fronting on Harbour Drive. The proposed building would comprise 4 levels across three wings surrounding a central courtyard, with the middle wing fronting on Harbour Drive.

Relevant design drawings for the proposal are provided below in Figure 54 through Figure 66, and include plans as well as Computer Generated Images (CGI). They are extracted from the State Significant Development Application (SSDA) prepared by Studio Johnston for the project.⁴³

6.1.2 Project justification

The project is a State Significant Development Application (SSD 83294209) for the construction of a residential flat building up to four storeys with a total of 60 affordable housing apartments.

⁴³ Studio Johnston, *211A-215 Harbour Drive Coffs Harbour State Significant Development Application*, 29 August 2025



Figure 54. North (top) and east (bottom) elevations of the proposed development (Source: extract from Studio Johnston *Concept Scheme for SDRP01*, 2 July 2025)



Figure 55. South (top) and west (bottom) elevations of the proposed development (Source: extract from Studio Johnston, 2025)



Figure 56. CGI of the proposed development's façade fronting on Harbour Drive, facing north (Source: Studio Johnston, 2025)



Figure 57. CGI of the proposed development from the North St corridor, facing west (Source: Studio Johnston, 2025)

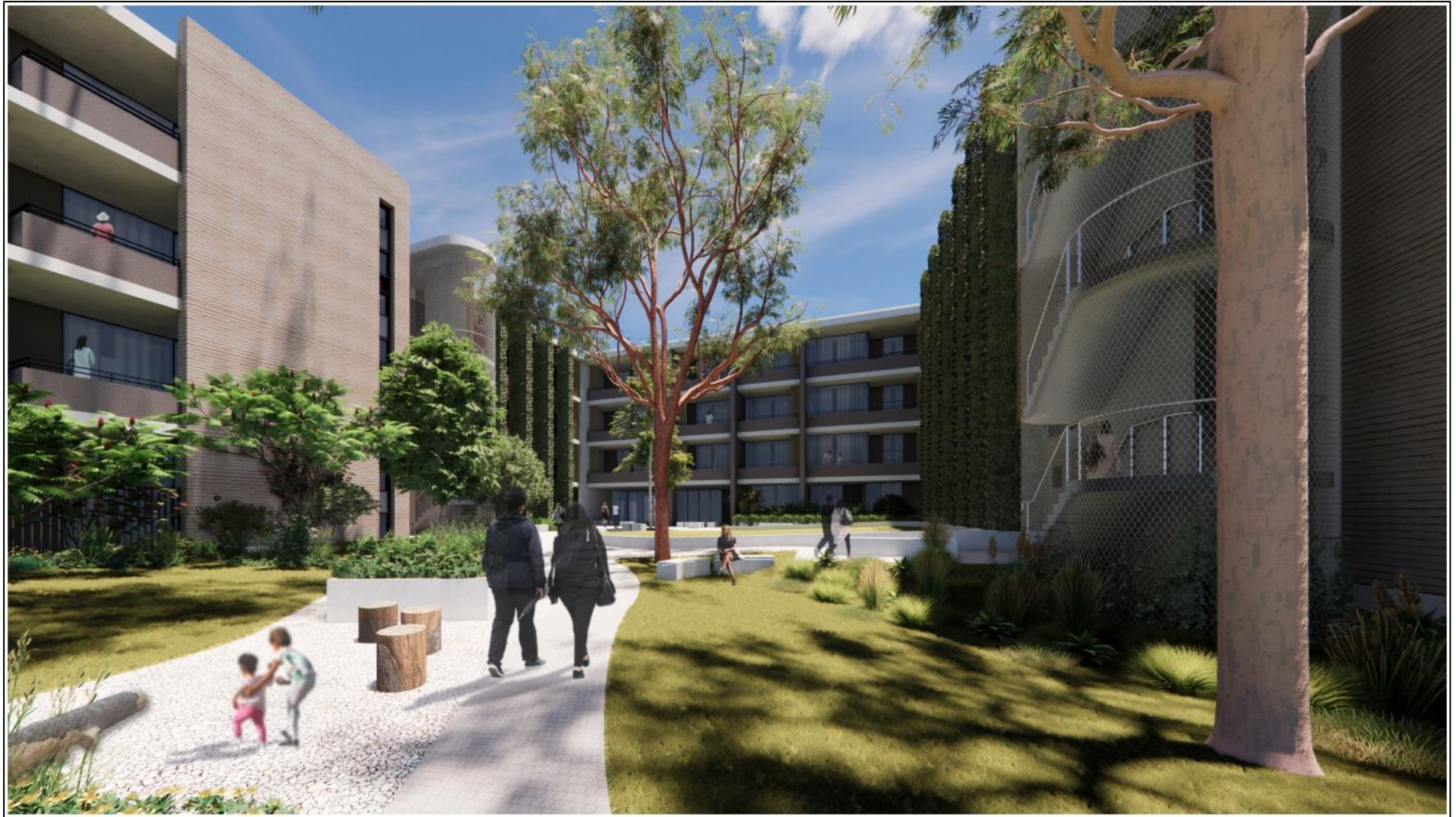


Figure 58. CGI of the central courtyard, facing south (Source: Studio Johnston, 2025)

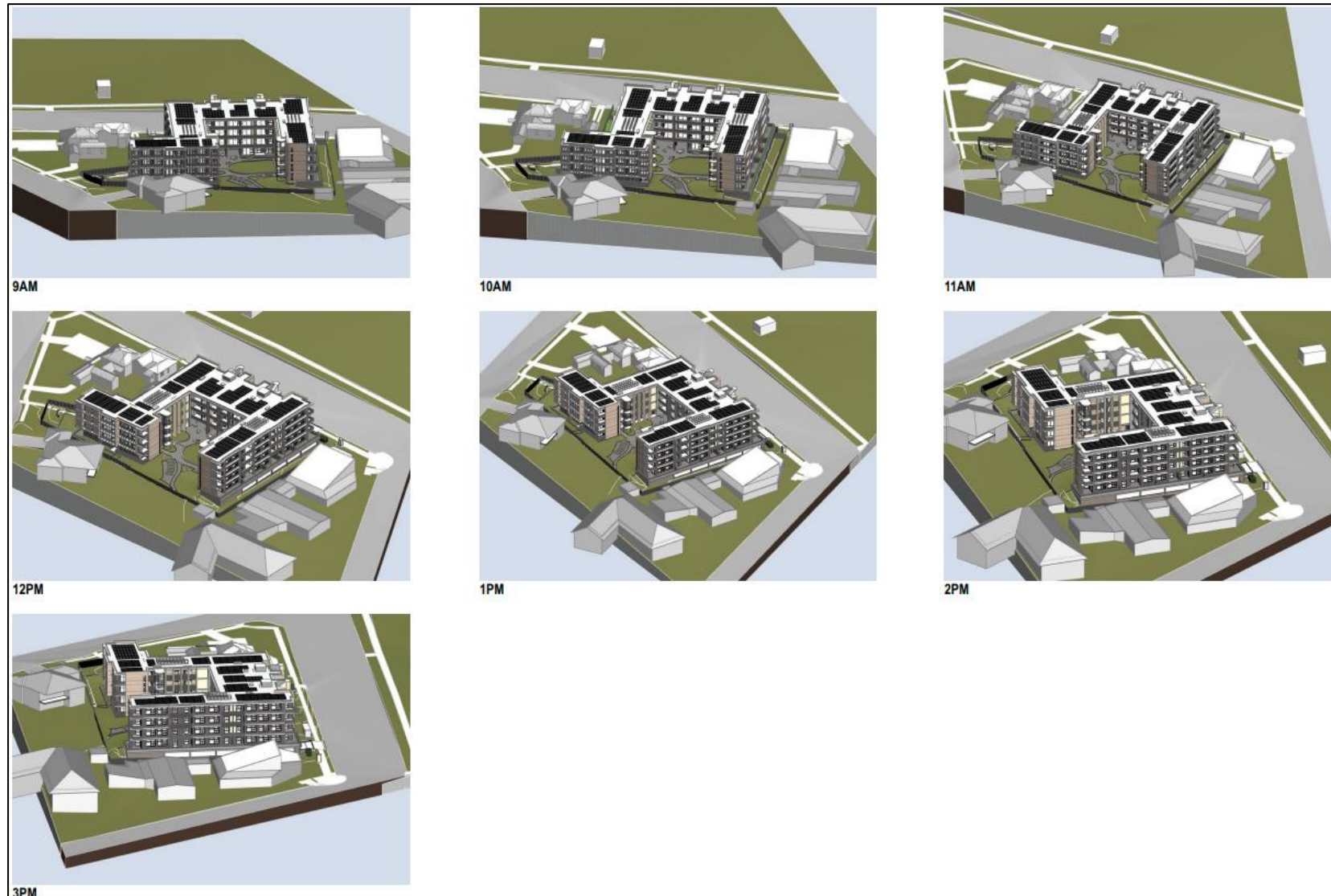


Figure 59. 3D render of solar projections of the proposed development (Source: Studio Johnston, 2025)



Figure 60. Ground level of the proposed development (Source: Studio Johnston, 2025)

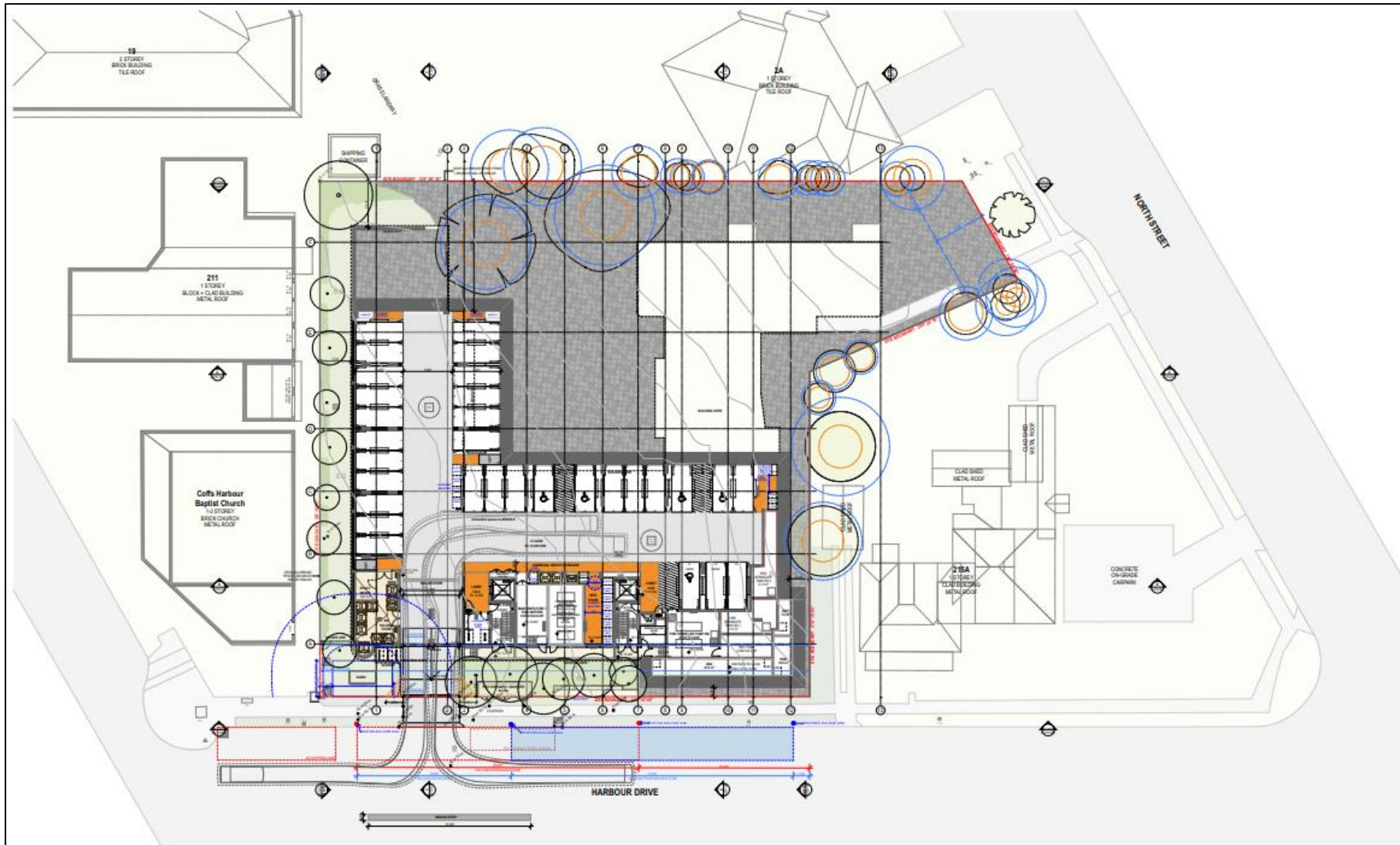


Figure 61. Lower ground level of the proposed development (Source: Studio Johnston, 2025)



Figure 62. Schedule of finishes for the proposed development (Source: Studio Johnston, 2025)



Figure 63. Plan of the proposed landscaping of the proposed development (Source: Studio Johnston, 2025)

7.0 HERITAGE IMPACT ASSESSMENT

7.1 Overview

This section assesses the heritage impact of the proposed works at the study area on heritage values within the study area. Justifications are also provided for the proposed works.

Within this approach, the objective of a heritage impact assessment is to evaluate and explain how the proposed works will affect the heritage value of the study area and/or place. A heritage impact assessment should also address how the heritage value of the site/place can be conserved or maintained, or preferably enhanced by the proposed works.

In order to consistently identify the impact of the proposed works, the terminology contained in the following table has been references throughout this document. The terminology and definitions are based on those contained in guidelines produced by Heritage NSW⁴⁴ and are shown in Table 10.

Table 10: Terminology for assessing the magnitude of heritage impact.

Grading	Definition
Total loss of significance	Major adverse impacts to the extent where the place would no longer meet the criteria for listing a heritage register.
Adverse impact	Major (that is, more than minor or moderate) adverse impacts to heritage significance, defined as removing significant features, obscuring key views, or removing evidence of significant historical associations, which require substantial changes to the scope of works or design to sufficiently reduce those impacts. The material threshold applies when substantial changes to the application are required to reduce the adverse impacts to a moderate or minor level.
	Moderate adverse impacts to heritage significance. Actions in this category would include removal of an important part of a heritage item's setting or temporary removal of significant elements or fabric. The impact of these actions could be reduced through appropriate mitigation measures.
	Minor adverse impacts to heritage significance, defined as impacts to heritage significance that are minor enough that they are outweighed by other benefits of the application, for example sympathetic alterations to an original non-compliant balustrade to enable continued public use.
Little to no impact*	An alteration to heritage significance that is so minor that it is considered negligible. *Little to no impact (as opposed to no impact) acknowledges that any change will result in some level of impact/alteration to heritage significance.
Positive impact	Alterations that enhance the ability to demonstrate the heritage significance of a listed place.

⁴⁴ Heritage NSW, *Material Threshold Policy*, 2020

Table 11: Terminology for heritage impact types

Impact	Definition
Physical	Impacts resulting from works located within or outside the curtilage boundaries of the heritage item, caused by removing or altering the item or fabric of heritage significance
Visual	Impact to views, vistas and setting of the heritage item resulting from proposed works within or outside the curtilage boundaries of the heritage item.
Potential	Impacts resulting from increased noise, vibrations and construction works located within or outside the curtilage boundaries of the heritage item.
Archaeological	Impacts to potential archaeological remains located within the curtilage boundaries of the heritage item.

7.1.1 Physical heritage impacts

The proposed works would not occur within the gazetted curtilages of statutory heritage items and are, therefore, unlikely to result in physical impacts to heritage fabric. There are no discernible heritage significant values present within the study area that could experience physical impacts.

There are listed heritage items in the vicinity of, and adjacent to, the study area; however, these items are unlikely to experience alterations to their fabric as a result of the proposed works.

Physical impacts: little to no adverse impact

7.1.2 Visual heritage impacts

The proposed works would be taking place within the visual setting of both the Former Police Station and Courthouse (LEP no. I15) and the Coffs Harbour Public School (LEP no. I25; Dept. of Education S170 Register).

The proposed development would be taller and considerably more imposing than extant buildings in the surrounding landscape and would occupy much of the streetscape and skyline in the vicinity of the two heritage items. Both of these items are locally significant due in part to their prominence as recognisable landmarks for the local community of Coffs Harbour. The proposed development's imposing stature would visually dominate the streetscape in the area and would therefore likely detract from the landmark status of both items, resulting in a **minor adverse** visual impact.

The principal public domain from which the heritage items are visible consists of the Harbour Drive road corridor. The degree to which the proposed development would obscure the visibility of the Former Police Station from vantage points in the Harbour Drive road corridor (particularly from the northwest) has not been formally examined, however this would likely be mitigated in part by the setback of the façade from Harbour Drive by 6 to 9 metres (Figure 54). The visibility of the Public School heritage item from the road corridor would not be affected by the proposed development, as it is on the opposite side of Harbour Drive from the study area.

The Former Police Station and Public School items further have high aesthetic heritage significance at the local level based on their character as pre-WWI, timber public buildings. The proposed development would present an articulated façade of brick, concrete and render, metal, and glass, constructed in four storeys. Articulating a façade can help mitigate the impacts on nearby or adjacent heritage items by breaking up the mass of new developments, making them appear less imposing

and more in scale with heritage buildings. By referencing the scale, pattern, and materiality of adjacent heritage items, articulated facades can help integrate new developments into their historic context without resorting to direct imitation. CGIs of the proposed development indicate that landscaping and vegetation would be implemented on the Harbour Drive frontage of the completed building (Figure 56), which would assist in easing the proposed development into the landscape. Additional vegetation on Harbour Drive would also assist in reducing the visibility of the proposed development from the Public School heritage item, though this would not be sufficient to completely obscure the line of sight.

However, as the proposed development does not appear to reference the scale, pattern, or materiality of the heritage items, it would present a challenging architectural contrast to the appearances and character of the items, which are both early 20th century, low, timber-frame buildings with pitched roofs. As a result of this contrast, combined with the scale and prominence of the proposed development in the streetscape, it would cause a **minor adverse** visual impact to the aesthetic heritage significance of the Former Police Station and Public School items.

Per Heritage NSW guidelines,⁴⁵ the overshadowing of heritage items or their setting is known to cause adverse heritage impacts. Overshadowing can result in the loss of visual prominence and solar access for heritage items, and can result in a loss of significance by disrupting the established scale, rhythm, and harmony of a heritage item's environment. As illustrated by the shadow diagrams included below (Figure 64 and Figure 65) the proposed development would result in partial overshadowing of the Former Police Station heritage item, particularly in the afternoon; this would cause a further **minor adverse** visual impact on the significance of the item.

⁴⁵ NSW Heritage Office (now Heritage NSW), 2002, *Local Government Heritage Guidelines*

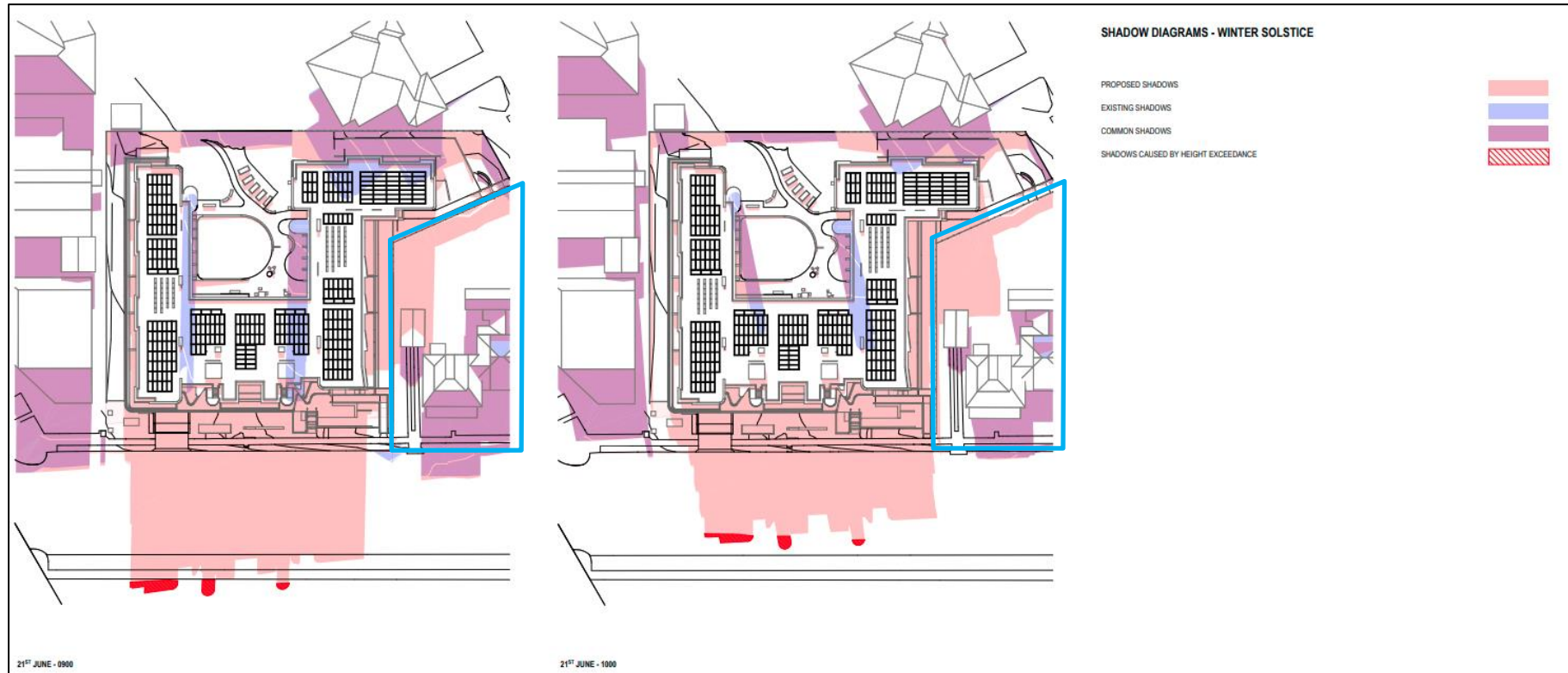


Figure 64. Shadow diagrams of the proposed development, 9 AM to 12 PM. The Former Police Station heritage item is outlined in blue (Source: Studio Johnston, 2025)

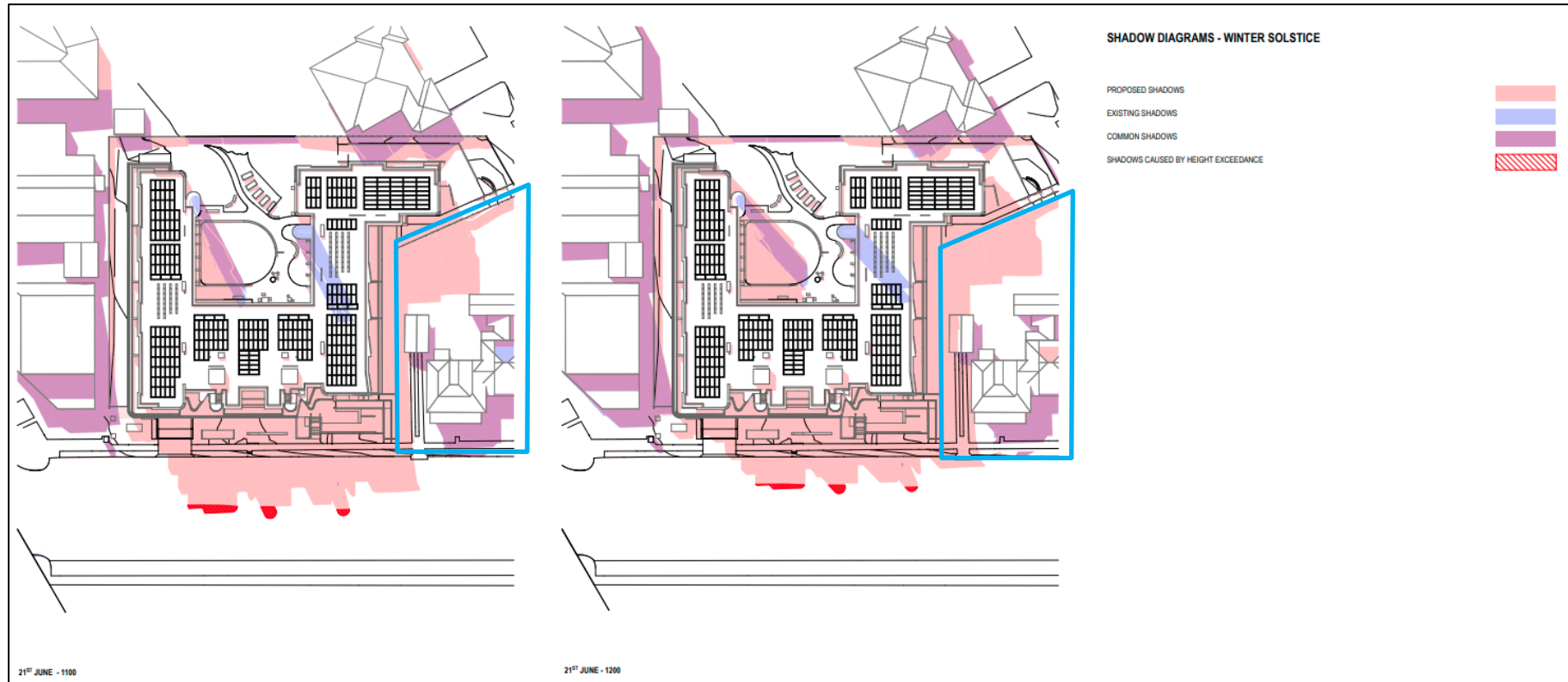


Figure 65. Shadow diagrams of the proposed development, 11 AM to 12 PM. The Former Police Station heritage item is outlined in blue (Source: Studio Johnston, 2025)

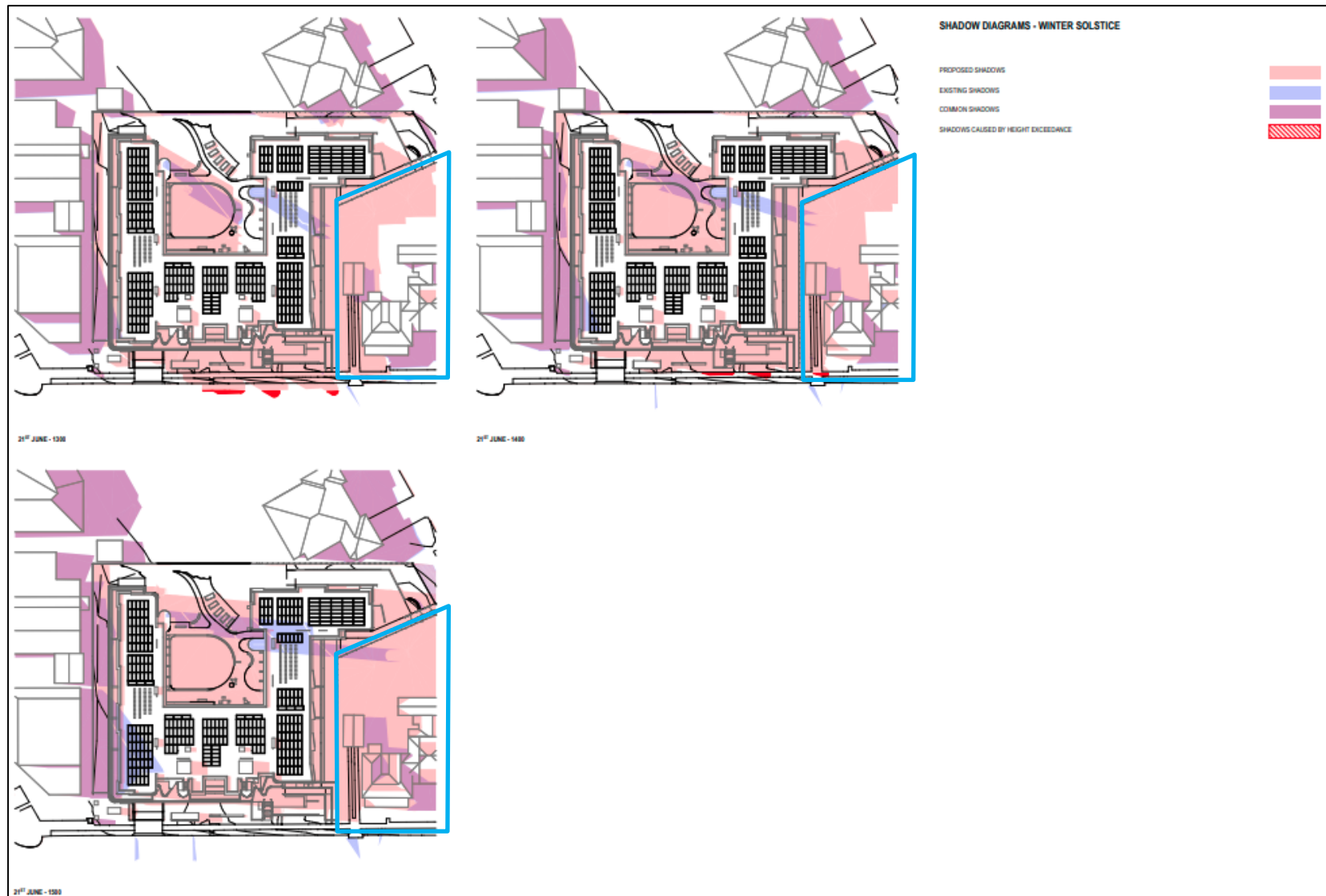


Figure 66. Shadow diagrams of the proposed development, 11 AM to 12 PM. The Former Police Station heritage item is outlined in blue (Source: Studio Johnston, 2025)

Overall, the proposed development would cause **minor adverse** visual heritage impacts due to its visual dominance in the streetscape, and challenging architectural contrasts for both heritage items in its vicinity, as well as overshadowing of the Former Police Station (the Public School item would not experience overshadowing). This would result in the partial loss of historical, aesthetic, and social significance for the Former Police Station and Public School.

Visual impacts: minor adverse impact

7.1.3 Potential heritage impacts

Potential impacts refer to the effects of vibrations caused by the use of plant, vehicle, and construction-related equipment. The perceptible distance for cosmetic damage from construction related vibration has been established to be items located less than 25m away from the construction work as determined in the NSW Government’s *Construction Noise and Vibration Guideline* issued in July 2023.

As there are significant heritage buildings within 25 metres of the proposed works (the Former Police Station and Courthouse), mitigation measures will be required to prevent vibration-related impacts to heritage fabric. Recommendations for such mitigation measures are included in Section 8.3 of this report.

7.1.4 Impacts to Heritage Items in Vicinity

This section assesses the potential physical and visual impacts of the proposed works on heritage items within the study area itself and its vicinity. The heritage impacts of the proposed works are outlined in Table 12.

Table 12: Assessment of heritage impact.

Item Name	Item/Listing Number	Potential physical impacts	Potential visual impacts
Coffs Harbour Public School	Dept. of Education S170 Register, SHI no. 5064316 Coffs Harbour LEP no. 115	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having minor adverse visual impacts to the item.
Former Police Station and Courthouse	Coffs Harbour LEP no. 125	The works have been assessed as having little to no adverse physical impacts to the item.	The works have been assessed as having minor adverse visual impacts to the item.

7.1.5 Impacts to archaeological resources

The study area has assessed as having low-moderate potential to contain significant archaeological remains associated with Phase 1 and 2, spanning from structures built around 1906 and extant to approximately 1962.

The proposed development would result in substantial impact to the ground surface of the study area. The study area has been assessed as having low-moderate potential to contain significant historical archaeological remains that would reach the threshold for Local significance, particularly in association with horse stables, foraging room and paddock. As a result, it is expected that the

proposed works would likely encounter or impact the potential archaeological resources within the study area. Therefore, during excavation of the proposed works it is recommended that a Heritage Induction be implemented prior to the proposed works. The guidelines for the Heritage Induction are outlined in the recommendations and mitigation measures (Section 8.3.2).

7.1.6 Cumulative impacts

Cumulative impacts refer to the combined, overlaid or added actions and interactions within a particular place associated with the past, present and the reasonably foreseeable future.

The proposed works are taking place in a section of Coffs Harbour that hosts a number of locally significant items, including two listed items within 250m of the study area. Though there are no heritage items in the confines of the study area itself, the proposed development would likely result in minor adverse visual impacts on heritage items in the vicinity. Development pressures in the area will cause other densification impacts. Depending on the scale and location of future developments, these will impact on the setting of the surrounding heritage items as part of an ongoing trend of urban densification.

Overall, the proposed development will have a **minor adverse** effect on the visual curtilage of the two items in close proximity to the study area.

7.2 Questions to be considered in a Statement of Heritage Impact

Heritage guidelines⁴⁶ prepared by the NSW Heritage Office (now Heritage NSW, DPC) outline design considerations for projects that involve construction projects in the vicinity of heritage items.

Design considerations are discussed in Table 13.

Table 13: Heritage considerations for the proposal (Source: NSW DPE, 2023).

Heritage Consideration	Discussion
<i>Do the proposed works include removal of unsympathetic alterations and additions? How does this benefit or impact the heritage item and its significance?</i>	The proposed works would not include the removal of unsympathetic alterations and additions.
<i>Do the proposed works affect the setting of the heritage item, including views and vistas to and from the heritage item and/or a cultural landscape in which it is sited? Can the impacts be avoided and/or mitigated?</i>	<p>The proposed development would result in overall minor adverse visual impacts to the heritage items and their setting in the vicinity of the study area, as it would result in an imposing structure which does not respond to the heritage character of either the Former Police Station and Public School items, while also causing partial overshadowing of the Former Police Station, and a loss of prominence of both items.</p> <p>The impacts of the proposed development on the visibility of the Former Police Station (adjacent to the study area) from the road corridor would be mitigated by the 6-9m setback of the development's façade from Harbour Drive. The proposed development would also feature landscaping and vegetation which would assist in easing the completed building into the surrounding landscape, by partially obscuring the façade and reducing the overall massing.</p>

⁴⁶ 'Guidelines for preparing a statement of heritage impact', Department of Planning and Environment, 2023

Heritage Consideration	Discussion
<i>Are the proposed works part of a broader scope of works?</i>	The proposed works are part of the housing development initiative known as the Housing Australia Future Fund (HAFF).
<i>Does this proposal relate to any previous or future works? If so, what cumulative impact (positive and/or adverse) will these works have on the heritage significance of the item?</i>	The proposed development is not related to any previous or future works. However, heritage assessment for future developments in the area would need to consider the heritage values of the items in the surrounding area, depending on the scale and proximity of new development.
<i>Are the proposed works to a heritage item that is also significant for its Aboriginal cultural heritage values? If so, have experts in Aboriginal cultural heritage been consulted?</i>	This report does not include an assessment of Aboriginal Cultural Heritage values.
<i>Has the applicant checked if any other approvals or a separate process to evaluate the potential for impacts is required?</i>	Advice regarding the appropriate approval pathway for the proposal is included below in Section 8.2.
<i>Do the proposed works trigger a change of use classification under the National construction code that may result in prescriptive building requirements? If so, have options that avoid impact on the heritage values been investigated?</i>	The proposed development would not trigger a change of use classification.
<i>If the proposed works are to a local heritage item, are the requirements of the development control plans or any local design guidelines that may apply to the site considered?</i>	The proposed development would not take place in the curtilage of a heritage item, however it is in the vicinity of, and adjacent to, heritage items of local significance. The Coffs Harbour DCP 2015 contains provisions which guide developments in the vicinity of heritage items; these provisions are discussed below in Section 7.3.1.
<i>Will the proposed works result in adverse heritage impact? If so, how will this be avoided, minimised or mitigated?</i>	<p>The proposed development would result in little to no adverse physical heritage impacts, as there are no heritage curtilages within the study area. The proposed development would result in minor adverse visual impacts overall to the Public School and the Former Police Station heritage items, due to the development's imposing stature, challenging architectural contrast, and partial overshadowing of the Former Police Station. The proposed development would comply with the maximum building height of 15.5 metres, which reduces the extent of the overshadowing. Landscaping is also proposed for the development, which will assist in easing the completed building into the surrounding landscape, and in reducing the overall massing of the development.</p> <p>The impacts to the visibility of the Former Police Station from the road corridor would be mitigated by the setback of the façade by 6 to 9 metres from Harbour Drive. The Public School heritage item's visibility would not be affected by the proposed development.</p>

Table 14 below contains an assessment of the proposal against considerations for specific types of works. These considerations have been extracted from Heritage NSW's *Guidelines for preparing a statement of heritage of works* (2023).

Table 14: Considerations for specific types of work

Considerations for specific types of work	Discussion
Works adjacent to a heritage item or within the heritage conservation area (listed on an LEP)	
<i>Will the proposed works affect the heritage significance of the adjacent heritage item or the heritage conservation area?</i>	<p>The proposed development would have little to no adverse physical heritage impacts due to the absence of heritage curtilages within the study area.</p> <p>However, the proposed development would have minor adverse visual impacts on the significance of the Public School heritage item in its vicinity, and of the Former Police Station heritage item adjacent to the study area. These minor adverse visual impacts would be due to the proposed development's relatively imposing stature, and due to its challenging architectural contrast to the heritage character of both items. There would be a further minor adverse visual impact to the significance of the Former Police Station as a result of partial overshadowing.</p>
<i>Will the proposed works affect views to, and from, the heritage item? If yes, how will the impact be mitigated?</i>	<p>The proposed development's impact on the visibility of the Former Police Station heritage item from vantage points on Harbour Drive would be mitigated by the setback of the façade of between 6 and 9 metres from the road corridor. The visibility of the Public School heritage item would not be affected, as it is located on the opposite side of Harbour Drive from the proposed development.</p>
<i>Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?</i>	<p>The proposed development would not take place in a heritage conservation area.</p>

7.3 Assessment against relevant policies

7.3.1 Coffs Harbour Development Control Plan 2015

The Coffs Harbour DCP 2015 does not contain specific provisions concerning the Former Police Station and Coffs Harbour Public School heritage items. However, Section F2.2 contains general provisions which guide developments in the vicinity of listed heritage items, which are outlined below

3. *Development of land adjoining a heritage item or heritage conservation area is to be designed so that it is:*
 1. *compatible with the average height, bulk and scale of buildings located on adjoining or nearby land; adequately set back to ensure that heritage items and other significant buildings in the streetscape are not dominated by new or infill development; and*
 2. *compatible with existing architectural elements including:*
 1. *the existing building line;*
 2. *brickwork styles;*

3. *parapet style and rhythm;*
4. *window and door opening dimensions, proportions and spacing;*
5. *fenestration treatment;*
6. *roof form and treatment; and*
7. *materials and finishes.*

The proposed development is generally inconsistent with the provisions of the Coffs Harbour DCP 2015, as it is not compatible with the average height, bulk, and scale of either the Former Police Station and Public School heritage items. The proposed development would be consistent with the language of the provision requiring a setback, however the resulting completed building would likely still dominate the streetscape and setting of both heritage items.

The materiality and architectural style of the proposed development would consist of concrete or render, with large windows and metal trim, set into an articulated, orthogonal façade four storeys tall. This design would pose a challenging contrast to the heritage character of the two items, as both present as low timber buildings with pitched roofs and awnings, dating to the early 20th century

8.0 CONCLUSION

8.1 Conclusion

Investigation of the area as part of preparing this SoHI has determined the following:

- There are **no** statutory or non-statutory heritage items within the boundaries of the study area
- There are **two** heritage items listed on **two** separate heritage registers in the vicinity of the proposed works:
 - Coffs Harbour Public School (LEP no. I25; NSW Dept. of Education s170 Register SHI no. 5064316)
 - Former Police Station and Courthouse (LEP no. I15)

The Former Police Station and Courthouse heritage item is locally heritage significant due to its historical, associative, aesthetic, and social values, as well as its research potential, rarity, and representativeness as a good example of a co-joined weatherboard police station and courthouse. Coffs Harbour Public School is locally heritage significant due to its historical, aesthetic and social values, as well as its research potential, rarity, and representativeness as a good example of a group of Federation-era government buildings within the Coffs Harbour LGA.

Based on the drawings in the Studio Johnston *Concept Scheme for SDRP01*, which were issued on 2 July 2025 the proposed works would result in the following heritage impacts:

- **Little to no adverse** physical impacts to the heritage significance of the Former Police Station and Courthouse and Coffs Harbour Public School
- **Minor adverse** visual impacts to the heritage significance of the Former Police Station and Courthouse and Coffs Harbour Public School

8.2 Approval pathway

This project is being undertaken as part of an SSD (ID no. 83294209) for the construction of a residential flat building up to four storeys with a total of 60 affordable housing apartments. SEARs were issued on 2 May 2025.

This report has been prepared to meet the requirements of Condition 22 of the SEARs, outlined below in Table 15 ⁴⁷

⁴⁷ Planning Secretary's Environmental Assessment Requirements, SSD 83294209

Table 15: Condition 20 of the project SEARs

SEAR	Supporting Documentation
<p>22. Environmental Heritage</p> <ul style="list-style-type: none"> Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines. 	<p><u>If required:</u></p> <ul style="list-style-type: none"> Statement of Heritage Impact Archaeological Assessment

8.3 Recommendations and mitigation measures

Consideration should be given to the following recommendations.

8.3.1 Built

- Consideration should be given to the provision of heritage interpretation as part of the project, which would outline the history, associations and significance of the site and wider area. Interpretive measures could involve interpretive signage, panels or displays.
- The vibration assessment for the project must take into consideration the German Standard DIN 4150 – Part 3 guidelines regarding expected peak particle velocity (PPV)⁴⁸ and establish if there is potential for effects of vibration to built heritage items in the surrounding area. If there is potential for vibration to affect built heritage items, further advice from a Heritage Consultant must be sought regarding requirements for vibration monitoring and condition checks.

8.3.2 Archaeology

The site has **low- moderate** potential for works that reaches local significance and **nil-low** potential for relics.

The early 20th-century remains of a Mounted Police paddock, stables and twin toilets which were originally built within the boundaries of the current study area (215 Harbour Drive) and associated with the Coffs Harbour Police Station and Court house, are assessed as possessing local archaeological significance for their potential to contribute to an understanding of the spatial development and policing infrastructure of the area.

While associated with the broader historical landscape of the SHI-listed local heritage site (Item no. 115), they fall outside of the Coffs Harbour former police station and courthouse listing curtilage and are not themselves listed. The archaeological resource is considered not significant enough to warrant in-situ retention. Accordingly, impacts associated with proposed removal are considered acceptable, subject to appropriate mitigation through archival recording and monitoring.

⁴⁸ DIN 4150-3:2016-12, Vibration in buildings – Part 3: Effects on structures.

Heritage induction

It is recommended that a heritage induction be prepared and provided by a suitably qualified historical archaeologist. This induction must identify sensitive areas and the types of archaeological remains that may be encountered during excavation works. This induction must outline the requirements of the project under the *Heritage Act 1977* (NSW), including the statutory obligations relating to relics and approvals.

The induction should emphasise that any remains identified must be assessed in accordance with the findings of the approved archaeological assessment, and that the treatment of such remains must be consistent with the recommendations of those documents. The induction must also outline the legal requirement to cease work and notify Heritage NSW in the event of the discovery of archaeological relics not previously identified.

The induction should further highlight the responsibilities of contractors and site personnel in protecting heritage values, and the procedures for immediate reporting of finds to the project archaeologist. It is recommended that the induction be delivered prior to the commencement of ground-disturbing activities and be repeated for any new personnel joining the project. Attendance should be recorded to ensure all staff are aware of their obligations.

8.3.3 General recommendations

- Any additions or design modifications to the proposal, outside the scope of this assessment, would require additional heritage assessment to ensure consistency with this assessment.
- A copy of this report should be provided to Coffs Harbour Council to inform them of the proposal and the potential impacts to the study area.

9.0 REFERENCES

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