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CONCURRENT REZONING AND STATE SIGNIFICANT DEVELOPMENT APPLICATION - GORDON STREET AND VERNON STREET, COFFS HARBOUR

Attention:

Ms Kiersten Fishburn

Secretary

Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy Street

PARRAMATTA NSW 2150

Dear Ms Fishburn,

This letter is offered in support of the urban design and architectural proposal prepared to accompany a State Significant Development Application (SSDA) and concurrent rezoning for land at 19A-21 Gordon Street, Coffs Harbour. The site is controlled by the Uniting Church in Australia, Synod of NSW and ACT (UCA), the project proponent.

I was formally engaged by the proponent on 17 November 2025, and from this date have been briefed and reviewed the detailed urban design and architectural proposal, which positively responds to the intrinsic qualities of the site, its context and the immediate character of the Coffs Harbour CBD.

The proponent's SSDA is seeking approval for a proposal comprising the following:

- _ One part-basement level housing plant and services.
- _ Ground level incorporating retail premises, residential lobby, church worship hall with administrative rooms, and ancillary spaces including a community kitchen and chapel.
- _ Mezzanine level containing plant rooms.
- _ A six-storey podium containing commercial floor space with outdoor terrace and car parking for 173 vehicles.
- _ Eighteen levels of residential apartments, yielding 152 apartments in total, including the provision of forty affordable apartments
- _ Roof level comprising communal roof terrace, lift overrun and associated services
- _ Associated landscaping and public domain works

The developed architectural scheme seeks approval for a concurrent rezoning and SSDA, consistent with the site's declaration within the Housing Delivery Authority (HDA) planning pathway on 24 March 2025. This pathway has been established to identify high-yielding housing proposals capable of accelerated assessment and construction timeframes, the objective being to lift the quantum, quality and affordability of housing within strategically located urban areas of NSW.

Since my involvement, I have been briefed by the proponent's design team - led by Cortese - and as independent peer reviewer, I have formed an opinion of the merits of the site planning strategies, urban design response and detailed architectural design.

In summary, I am satisfied that the final proposal represents a high quality urban renewal that meaningfully responds to the character of this part of Coffs Harbour and serves the community well by virtue of the proposed SSDA meeting various strategic and site specific planning objectives. Of particular relevance is the significant component of forty affordable housing apartments to be provided and managed by Wesley Mission, a registered Community Housing Provider and part of the UCA.

Strategic Planning Merit

The subject site is approximately 2,000sqm in area and situated on land zoned E2 Commercial Centre at the heart of the Coffs Harbour CBD, close to services, cultural facilities, employment and amenities, and for this reason has strategic value consistent with the objectives identified by the HDA.

The site currently benefits from the following development standards for building height and density.

Coffs Harbour LEP 2013

<i>FSR:</i>	<i>4.5:1</i>
<i>Height of Building:</i>	<i>44m</i>

The site's HDA declaration presents an opportunity - primarily through the concurrent rezoning process - to identify and secure additional development capacity the site might reasonably accommodate. The detailed design proposal that has been prepared in response to the site's strategic merit results in the following development standards.

HDA planning pathway - as proposed

<i>FSR:</i>	<i>8.1:1</i>
<i>Height of Building:</i>	<i>89m</i>

Site Specific Merit

As well as a strong alignment with the strategic planning policy settings for lifting housing supply, the site exhibits strong site specific merits, which have been carefully studied and have influenced the final form, scale and arrangement of the proposed building.

Concise Analysis of Existing Urban Character

The character of the Coffs Harbour CBD is distinctive and offers high levels of amenity, including the following attributes:

- The immediate urban structure is a strong, clear and compact urban grid, situated close to the intersection of the Coffs Creek (and its riparian landscape) and the Pacific Highway, which traverses the city.
- The underlying topography generally presents as a shallow coastal basin falling gently towards the harbour, approximately 2.5km to the east.
- The broader landscape setting is a defining aspect of Coffs Harbour's character, whereby the steep coastal ranges establish a powerful landscape setting for the city form, sited at the foothills and running to the coastline and its natural harbour focus.
- As a well-defined CBD core, set in a strong natural landscape setting - coast, creek and mountains - Coffs Harbour has a very distinctive, compact, sub-tropical urban and landscape character.
- The CBD benefits from a diverse range of mixed development, consistent with a major regional city, providing an urban focus for the north coast region.
- Occupying a prominent intersection at Vernon and Gordon Streets, and with three street frontages, the site naturally benefits from strong address and good development carrying capacity.
- The site directly abuts the recently completed Yarrila Place, an important community and cultural facility that has set a high bar for design quality and architectural expression across the region.

These characteristics and positive urban qualities all provide strong urban design cues for the subject proposal.

A Contextually Responsive Design Approach

To this end, I am satisfied the site planning strategies, building envelope and general building configuration demonstrate a close alignment with the positive urban and landscape characteristics of Coffs Harbour. This is an ambitious but well-resolved development proposal that establishes a positive precedent for what would become the CBD's tallest building.

The scale and form of the proposal adopts a number of key alignments and datums derived from the immediate site context, which serve to strongly anchor the proposal in its setting. Despite its scale, the proposal creates no unreasonable off site impacts and represents a striking, slim, vertical element in an otherwise still largely horizontal CBD core.

If there is to be a first project that establishes a new precedent for building height in the CBD, it follows that the precedent needs to be a positive one, which sets a benchmark for the expected level of architectural quality and resolution necessary for a prominent urban marker.

As a free-standing point tower, the proposal adopts inherently elegant proportions, ordered compositional elements and deploys a taut inner logic that results in an overall form that - although unusual for the Coffs Harbour skyline - sits comfortably and confidently.

The resolved design approach - as described in Cortese's documentation dated December 2025 - represents a contextually sensitive, responsive and high quality renewal of the site and the broader urban landscape, bringing with it a range of benefits which include:

- Contributing to the renewal of Coffs Harbour as a distinctive, higher density regional centre thereby enhancing the vitality and liveability of the CBD.
- Making a meaningful contribution to the provision of affordable housing in a high amenity, accessible, regional CBD location.
- Marking a prominent corner location along Vernon Street at the heart of the CBD, reinforcing the observable pattern of corner sites accommodating buildings of greater scale and with increased urban presence.
- Adopting a compositional order of a strong, street-defining civic podium of six storeys, to help reduce the apparent sense of building mass and to tie the proposal into the typically mid-rise scale of existing buildings in the vicinity, particularly Yarrila Place immediately next door.
- Strongly articulating the tower form into a vertical composition. This results in a building form that is strongly modelled on the CBD skyline, and presenting a dramatic silhouette against the sky.
- Introducing a range of finer grain ground floor uses addressing Vernon Street, Gordon Street and Riding Lane, to extend the active street frontages evident elsewhere across the CBD. These active frontages are also provided with continuous colonnades for weather protection and pedestrian amenity.
- Providing deep, inset balconies and self-shading facades to mitigate against the impacts of visual privacy, and to tie a building of this scale into the prevailing urban fabric.
- Establishing a building envelope that permits the effective renewal and intensification of the subject site whilst not constraining neighbouring sites' longer term renewal potential.
- Providing a strong, characterful architectural expression, particularly at podium level to effectively screen the above ground car parking structures, which are unavoidable due to the shallow water table and prevalence of Class 4 acid sulfate soils across the CBD and close to Coffs Creek.
- Providing a proposed building envelope that brings with it no unreasonable overshadowing, wind effects or view loss impacts.

Design Quality and Amenity

Additionally, the developed design documentation includes a general building arrangement that demonstrates the proposed building envelope is capable of achieving a high level of design quality commensurate with the site's location, scale, use and urban presence. The preliminary design solution serves to demonstrate:

- Key aspects of residential amenity - solar access, cross ventilation, ceiling heights and the general arrangement of apartments and communal spaces - are each positively resolved within the proposed building envelope.
- A series of clear address points, to Vernon Street, Gordon Street and Riding Lane, signalling the formal building entry and providing an active ground level address.
- Street level activation is maximised along the site's three street frontages, enhancing the local area's amenity and character.

For each of these reasons, I am satisfied that the concurrent rezoning and SSDA submission represents a high quality urban design and architectural response, appropriate to the character and setting of this part of Coffs Harbour.

By adopting the proposed alignments, form and scale, the resultant building envelope achieves a strong, positive 'fit' within the locality to create a coherent and positive streetscape despite the increased scale and density of the proposal. At the same time, the associated detailed design delivers a proposal with high residential amenity (consistent with key targets established by the NSW Apartment Design Guide).

No unreasonable impacts arise from the proposed building form, its density or height - analysis included with the proposal demonstrates that neighbouring properties retain outlook and appropriate levels of solar access. The supporting material also indicates that off-site overshadowing created by the proposal falls primarily onto non-residential properties.

In ongoing consultation with key stakeholders, the proponent has received encouraging early feedback, most recently from the City of Coffs Harbour Council.

I am also aware that the Department has recently provided its preliminary feedback to the proponent, suggesting the need to reduce the proposed building height. Given the support of Council, and for the reasons set out in this letter of support, the proponent has - for now - elected to proceed with the lodgment of the proposal in its current form and with extensive urban design justification. During the formal assessment process, the proponent would seek any further opportunity to discuss the merits of the concurrent rezoning and SSDA with the Department.

In conclusion, the proposed site planning and detailed design response has been carefully considered for its urban design and contextual fit - balancing the retention of urban design qualities evident in the immediate vicinity with the provision of an efficient and sustainable intensification of the site for residential uses, including the provision of a mix of affordable housing apartments - all to contribute to an increase in diverse housing supply, and a positive urban renewal project with a distinctive contemporary architectural character.

Please feel free to contact me to discuss any aspect of this letter.

Regards,



Matthew Pullinger LFRAIA
Registered Architect: 6226

Concise Curriculum Vitae

Matthew Pullinger is an award-winning architect and urban designer, whose experience lies in the design of the city and urban centres, residential apartment buildings, commercial office buildings and also in the design of transport infrastructure.

Matthew has attained the following formal qualifications:

- _Master of Urban Design, University of Sydney, 2000
- _Bachelor of Architecture (Hons), University of Sydney, 1995
- _Bachelor of Science (Architecture), University of Sydney, 1992
- _NSW Registered Architect - 6226

Matthew is a Past President (NSW) and Life Fellow of the Australian Institute of Architects and a respected leader of the architecture profession.

Since 2009 he has served as a member of a number of design advisory panels, whose function has been to provide clear, constructive advice on matters of design excellence in the built environment.

- _2009 to date - City of Ryde, Urban Design Review Panel
- _2014 to date - Inner West Council, Architectural Excellence Panel
- _2018 to date - City of Sydney, Design Advisory Panel, Residential Sub-committee
- _2018 to date - Inaugural Member, NSW State Design Review Panel
- _2023 to date - Member, Canterbury Bankstown Council, Design Review Panel

Earlier in his career, Matthew worked with the NSW Department of Planning's Urban Design Advisory Service (UDAS) on urban design and public policy projects such as the State Government's initiatives to lift the design quality of residential apartment development across New South Wales, and was an author of State Environmental Planning Policy SEPP 65 (now Chapter 4 of the Housing SEPP).