



Environmental Impact Statement and Concurrent Rezoning Report

Mixed Use Development at 19A-21 Gordon Street, Coffs Harbour

Submitted to Department of Planning, Housing and Infrastructure
on behalf of The Uniting Church in Australia Property Trust (NSW)

SSD-91539707

Prepared by Colliers Urban Planning

28 May 2026 | 2240606



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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H. Preliminary Arboricultural Impact Assessment Report	Ross Leaver
I. Preliminary (Stage 1) and Detailed (Stage 2) Site Contamination Assessment	Regional Geotechnical Solutions
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KK. Confirmation of Community Housing Provider	Wesley Mission
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Signed Declaration

Project Details		
Project Name	Uniting Coffs Harbour 19A-21 Gordon Street	
Application Number	SSD-91539707	
Land to be Developed	19A-21 Gordon Street, Coffs Harbour 2450, identified as Lot 21 in DP880214	
Applicant Details		
Applicant Name	The Uniting Church in Australia Property Trust (NSW)	
Applicant Address	L 10 222 Pitt Street, Sydney, NSW, 2000	
Prepared By		
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Qualifications	BCP (Hons), MPIA	BA (Hons) MCD MRTPI PIA (Assoc.)
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Declaration		
Name	Schandel Fortu	
Qualifications	BEP, BURP, MEM, MPIA (+ EIA)	
Registration Number	R9852	
Organisation Registered With	Planning Institute Australia	
The undersigned declares that this EIS: • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.		
Signature		
Date	28/05/2026	

Executive Summary

Purpose of this Report

This Environmental Impact and Rezoning Statement (**Report**) has been prepared on behalf of The Uniting Church in Australia Synod of NSW & ACT in support of a State Significant Development Application (**SSDA**) identified as SSD-91539707. The application seeks consent for a proposed mixed use development comprising residential, commercial, retail, and community uses on land at 19A-21 Gordon Street, Coffs Harbour (the **site**).

The Department of Planning, Housing and Infrastructure (**Department**) issued Industry-Specific Secretary's Environmental Assessment Requirements (**SEARs**) for the proposal on 4 September 2025. This proposal is prepared in accordance with the guidance provided by the Housing Delivery Authority (**HDA**) for concurrent rezoning reports, the requirements as prescribed by Part 8 of the Environmental Planning and Assessment Regulation 2021 and the State Significant Development Guidelines, and addresses the issues raised in the SEARs.

The Site and Context

The site is located at 19A-21 Gordon Street, Coffs Harbour. It is situated within the City of Coffs Local Government Area (**LGA**), 200 meters south-east of the Pacific Highway in the Coffs Harbour City Centre. The site is regular in shape and comprises one (1) allotment identified as Lot 21 DP880214, with a site area of 2,023m².

The site has a frontage to three (3) primary roadways, including a 40m frontage to Gordon Street, 50m to Vernon Street and a 40m frontage to Riding Lane. The existing development of the site consists of an ageing and underutilised church building and gravel car park, with adjoining development being characterised by recently redeveloped mixed use residential and retail buildings, council offices and a community library. The site's CBD-core location leverages existing infrastructure and frequent public transport, supporting a compact city outcome and reducing pressure for expansion to coastal and rural edges.

Proposal Overview

This proposal seeks the following:

- **Approval of a rezoning request:** to support the proposed mixed-use development, a rezoning request is being sought concurrently with the SSD application under the HDA pathway. The rezoning request seeks to amend the Coffs Harbour Local Environmental Plan 2013 by amending the maximum building height and floor space ratio controls applicable to the site. These changes will support a built form that aligns with the strategic vision for the site facilitating a contemporary church redevelopment alongside new housing supply to deliver a vibrant mix of uses consistent with the aims of the National Housing Accord.
- **Development consent for the proposed development:** The SSD application seeks concurrent consent for a high-quality mixed-use development comprising semi-basement servicing areas, ground-level retail and community uses, podium-level parking, and commercial premises above the podium, together with market and affordable residential apartments and rooftop communal areas, to a maximum building height of 26 storeys.

The design incorporates a church, a community kitchen, and generous rooftop communal landscaped areas to enhance amenity. The built form is shaped by appropriate setbacks, active frontages, and upper-level articulation to ensure a sensitive transition to the surrounding context while delivering a high level of sustainability, residential amenity, and urban design.

The proposed height and above-ground parking configuration are justified by site constraints, including acid sulfate soils and a high water table, which render basement construction technically challenging and cost-prohibitive, with underground parking estimated to cost more than four times that of above-ground.

Social and Economic Benefits

The proposal will deliver 152 new apartments, including 40 affordable dwellings for key and essential workers, in a well-connected city-centre location. It will activate the CBD with new community facilities (including a place of worship and community kitchen) and ground-level retail and commercial uses along Gordon Street, Vernon Street and Riding Lane. The development will generate substantial economic benefits, including 150 workers on site at peak, over 2,000 jobs supported across the three-year construction period, and an estimated \$5+ million local economic uplift. The Uniting

Church will remain an active owner-occupier, sustaining social initiatives on-site. Overall, the project functions as a catalyst that strengthens the City Centre's role while supporting a compact urban form.

Strategic Context and Site-Specific Merit

The proposal responds to strong population growth in Coffs Harbour (with 18,519 additional residents forecast by 2046) and a documented housing need for 12,800 dwellings by 2041 (approx. 800 p.a.). By concentrating density within the City Heart, the proposal for 152 new dwellings supports compact city principles and aligns with contemporary strategic directions, including *INVESTCOFFS Prospectus 2025*, the *Coffs Harbour Affordable Housing Strategy 2024*, the *Coffs Harbour Regional City Action Plan 2021*, and the *Local Growth Management Strategy 2020*.

The *City of Coffs Harbour Affordable Housing Strategy 2024* further identifies a need for approximately 2,215 additional affordable dwellings by 2041, with a focus on smaller dwellings suited to lone-person households and couples without children. In this context, the proposal makes a meaningful contribution by delivering 40 affordable dwellings within the overall 152 dwellings.

Compared with the outdated 2013 Masterplan (which has yielded limited housing and catalyst outcomes), these more recent frameworks advocate an activated, higher-density CBD with taller towers in suitable locations. The proposal advances this vision by co-locating housing, affordable housing, employment and community uses on an accessible CBD site, consistent with the National Housing Accord and State housing delivery objectives.

Statutory Context

The proposal is governed by the *Environmental Planning and Assessment Act 1979* (EP&A Act), which sets out the statutory framework for land use planning and development in New South Wales. As a State Significant Development (SSD), the project is assessed under Part 4, Division 4.7 of the EP&A Act, which applies to developments of state importance due to their scale, economic value or strategic significance. The proposal has been declared SSD by *Ministerial Order No. 4 of 2025*, following a recommendation by the HDA, and is subject to assessment in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued under section 4.12(8) of the EP&A Act.

The concurrent rezoning request is facilitated under Part 3, Division 3.4 of the EP&A Act and is being progressed in line with the LEP Making Guideline. It seeks amendments to the *Coffs Harbour Local Environmental Plan 2013*, specifically to the Height of Buildings and Floor Space Ratio maps. The proposal must also demonstrate consistency with relevant State Environmental Planning Policies (SEPPs), including the Housing SEPP, Sustainable Buildings SEPP, and Transport and Infrastructure SEPP.

Community Engagement and Stakeholder Communication

The outcomes of the consultation process have been considered in the design of the project as detailed in **Section 8.0**. Overall, engagement to date has indicated generally favourable responses, which have further informed design refinements to built form, activation, and community uses.

Environmental Impacts and Mitigation Measures

This Report provides an assessment of the proposal's environmental impacts in accordance with the SEARs, including an assessment of the matters mentioned below.

- Connecting with Country;
- Built Form and Urban Design;
- Affordable Housing;
- Wind impacts;
- Visual Impact;
- Residential Amenity;
- Overshadowing;
- Traffic, Transport, And Accessibility;
- Biodiversity;
- Ecologically Sustainable Development;
- Flooding;
- Contamination and Remediation;
- Waste Management;
- Aboriginal Heritage;
- Building Code compliance;
- Utilities and Services;
- Social and Economic Impacts; and
- Public Benefit.

The proposed measures to manage and minimise potential impacts arising from the development are also set out in this Report. In doing so, this Report confirms that the proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective. A number of specialist consultant inputs appended to this Report have informed this analysis (refer to the **Table of Contents**).

Conclusion and Justification

Having regard to environmental, economic, and social considerations, the carrying out of the proposal is justified for the following reasons:

- It aligns with the *North Coast Regional Plan*, *Coffs Harbour LSPS*, and the *Coffs Harbour Regional City Action Plan 2036*, advancing a compact, mixed-use regional city that capitalises on existing infrastructure.
- It provides an outcome that is consistent with the RLEP 2014, applicable SEPPs and the Apartment Design Guide, enabling a high-quality built form outcome in the CBD core.
- It delivers diverse housing in an accessible location, including 40 affordable housing dwellings for key and essential workers, directly supporting Council's affordable housing objectives and the National Housing Accord.
- It acts as a catalyst for the City Centre, delivering community facilities and activated ground-level retail that enhance Gordon Street, Vernon Street and Riding Lane, and encouraging further private investment consistent with *INVESTCOFFS Prospectus 2025*.
- It generates substantial economic benefits, including construction employment, ongoing jobs from new retail/commercial uses, and broader local economic uplift.
- The scale, massing and height are appropriate for a prominent corner site within the City Heart, achieving design excellence through a slender, articulated tower form and sensitive setbacks, including from Yarilla Place.
- The above-ground parking arrangement is justified by acid sulfate soils and a high water table, which render basement parking cost-prohibitive, without causing adverse environmental or amenity impacts.
- Supporting technical studies confirm that the environmental impacts associated with the proposal are acceptable and will not give rise to any adverse impacts.
- The proposal represents a suitable and beneficial outcome for this site and is in the public interest.

The proposed development is considered to be in the public interest and will not result in any unacceptable social, economic or environmental impacts that cannot be appropriately managed through the identified mitigation measures and conditions of consent. Accordingly, it is recommended that this State Significant Development Application be approved subject to standard conditions of consent.

1.0 Introduction

This Environmental Impact and Rezoning Statement (**Report**) has been prepared by Colliers Urban Planning on behalf of The Uniting Church in Australia Synod of NSW & ACT (the **Applicant**) in support of a concurrent Rezoning Request and State Significant Development Application (**SSDA**) declared by the Minister as SSD. The proposal is submitted to the Department of Planning, Housing, and Infrastructure (**Department**) for a proposed mixed-use development, comprising ground-level retail and community uses, a 6-storey parking and commercial podium, and a 19-storey residential tower, including market and affordable apartments, on land at 19A–21 Gordon Street, Coffs Harbour (the **site**).

The site was declared State Significant Development (**SSD**) pursuant to *State Significant Declaration Order (No 4) 2025 (Order)* dated 2 April 2025, which specifies development in the Expression of Interest (**EOI**) application 235921 dated 3 February 2025, including development for the purposes of shop top housing with the provision of affordable housing at 19A–21 Gordon Street, Coffs Harbour, be declared to be SSD.

The Order enables the development to be undertaken through the Housing Delivery Authority (**HDA**) pathway with a concurrent rezoning to the *Coffs Harbour Local Environmental Plan 2013 (CHLEP 2013)* to facilitate amendments to the site's planning controls and unlock the opportunity for new housing on the site.

On 4 September 2025, the Department issued the Secretary's Environmental Assessment Requirements (**SEARs**) and concurrent rezoning requirements for the project (SSD-91539707). Specifically, SSD-91539707 seeks consent for:

- Demolition of all existing structures on the site.
- Construction of a 26 storey building for use as a shop top housing development comprising ground level retail and community uses, podium basement parking and commercial uses, and above podium market and affordable apartments and rooftop.
- Landscaping and public domain works.
- Extension and augmentation of services and infrastructure as required.

Refer to the detailed project description at **Section 3.0**.

This Report has been prepared in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, the *Local Environmental Plan Making Guideline*, Part 8 of the *Environmental Planning and Assessment Regulation 2021 (EP&A Regulations)* and the *State Significant Development Guidelines*. The purpose of this Report is to document the urban planning, design, environmental investigations and technical analysis undertaken in support of the proposal. The Report provides an assessment of the proposed approach sought to manage development, environmental and technical considerations, and confirm the suitability and necessity of any additional infrastructure required to support the intent of the proposal. It also evaluates the potential impacts of the development, and outlines mitigation strategies to ensure sustainable outcomes. It serves as a critical tool for informed decision-making by the consent authority, stakeholders, and the community.

This Report is set out as follows:

- Section **2.0** outlines the existing strategic and statutory context, including the details of the site.
- Section **3.0** provides a description of the proposed development.
- Section **4.0** provides a description of the proposed amendments to the CHLEP 2013.
- Section **5.0** sets out the justification of the strategic and site-specific merit of the proposed amendments to the CHLEP 2013.
- Section **6.0** documents the project's consistency with the relevant statutory framework.
- Section **7.0** outlines consultation outcomes to date and engagement still to be undertaken for the project.
- Section **8.0** provides an assessment of the relevant environmental planning matters.
- Section **9.0** sets out the justification for the project as a whole.

This Report should be read in conjunction with the Architectural Drawings (**Appendix A**), and the accompanying Design Report (**Appendix B**) prepared by Cortese Architects, and other documentation appended to this report (refer to **Table of Contents**).

1.1 The Applicant

The Applicant is the Uniting Church in Australia, a long-established Christian organisation founded in 1977. The Church has a broad national presence, with approximately 1,600 congregations and faith communities operating across metropolitan, regional and remote areas. These communities worship in more than 45 languages, including First Nations languages, reflecting the Church’s diverse and multicultural membership. According to the 2021 Australian Census, more than 670,000 people identified an affiliation with the Uniting Church.

The Applicant’s details are presented in **Table 1** below.

Table 1 *Applicant Details*

The Uniting Church in Australia Synod of NSW & ACT	
Address:	Level 10, 222 Pitt Street, Sydney NSW 2000
ABN:	82 492 408 686

1.2 Project Background

1.2.1 Initial Consultation with Council

Preliminary discussions were held with Coffs Harbour City Council and Colliers Urban Planning (formerly Ethos Urban) on 1 October 2023. The preliminary discussions associated with the development at an early stage highlight key matters such as height limitations, surrounding development and flooding. The initial advice from the Council subsequently informed the design development process.

1.2.2 Pre-lodgement Discussions with Council

The Applicant attended a Pre-DA Meeting with Council Officers on 2 December 2024 to discuss a concept scheme. Council Officers provided advice in response, which identified a number of matters to be considered as part of the continued design development process. These included land permissibility, potential planning pathways, bulk and scale, and strategic merit.

1.3 Housing Delivery Authority and National Housing Accord

The NSW State Government has agreed to a National Housing Accord (**Accord**) with other states and territories, local government, institutional investors and the construction sector. The Accord includes an initial aspirational target agreed by all parties to build 1.2 million new well-located homes over 5 years from mid-2024. NSW has a target to deliver 377,000 new homes over five years by July 2029 under the National Housing Accord.

To accelerate the delivery of much needed homes and help meet NSW’s target under the Accord, the NSW Government has established the HDA. The HDA offers a clear planning pathway for large residential and mixed-use developments to be assessed as state significant development and state significant development with a concurrent rezoning. This process aims to improve consistency in planning decisions and speed up assessment, without sacrificing housing quality.

1.3.1 HDA Expression of Interest

An EOI was lodged with the HDA on 3 March 2025. On 24 March 2025, the HDA recommended that the proposal be declared SSD. The proposal was declared SSD by the Minister on 2 April 2025 with the associated *Ministerial Order (Order No. 4)* published on the NSW Planning Portal. As part of the subject HDA SSDA and concurrent rezoning, additional urban design testing and analysis of environmental impacts have been undertaken to inform the scheme, resulting in an increase in density compared to the previous concept scheme.

1.3.2 Pre-lodgement HDA Discussions with Council and the HDA

Engagement with the HDA and Council Officers occurred throughout 2025 to inform and refine the proposal. A meeting with the HDA on 2 May 2025 reviewed the EOI and preliminary scheme, with the HDA advising that while uplift in height and FSR could be supported, a standalone rezoning would not. HDA requested that the design be revised to test

additional dwelling capacity, including affordable housing, and ensure no unacceptable environmental impacts. The SEARs request lodged on 10 April 2025 was withdrawn and resubmitted following design revisions, with a revised application lodged via the Major Projects Portal on 21 August 2025. SEARs and a concurrent rezoning requirement were issued on 4 September 2025.

A project briefing was held on 7 November 2025, where the refined scheme was presented, with the HDA providing positive feedback on the design, recommending further consideration for a merit-based height justification. Council Officers were subsequently briefed on 28 November 2025 and expressed support for the proposal's architectural quality, housing outcomes and its contribution to the CBD, while emphasising the need for a clear rationale for the proposed height within the context of the evolving CBD.

A further meeting with Council Officers on 19 December 2025 confirmed strategic alignment with the *Coffs Harbour Local Growth Management Strategy*, noting benefits including housing diversity, high-quality infill and CBD connectivity. The increase in affordable housing from 20 to 40 dwellings was welcomed as an improved public benefit.

A meeting with Coffs Harbour City Councillors was held on 3 February 2026 to present the proposal, outline its strategic alignment and key design drivers, and receive Councillor feedback on planning, urban design, and delivery considerations. Feedback from Councilors was supportive.

Refer to **Section 7.0** and the Engagement Report and Community Engagement Table prepared by Colliers Urban Planning provided at **Appendix C** and **Appendix JJ** for further discussions in regard to all pre-lodgement activities.

2.0 Strategic and Statutory Context

This section identifies key strategic matters relevant to the assessment of the proposal, including the site's features, context, strategic context and other development in the surrounding area. This section also provides an analysis of feasible alternatives that were considered in light of the proposal's objectives.

2.1 Site Location and Context

The site is located at 19A-21 Gordon Street, Coffs Harbour. It is situated within the City of Coffs Local Government Area (LGA), just off the Harbour Drive Corridor, located just 200 meters south-east of the Pacific Highway. The surrounding public transport network links the site to employment and services, including the major shopping centre Coffs Central, as well as the Yarrila Place.

The site's locational context is shown at **Figure 1**.

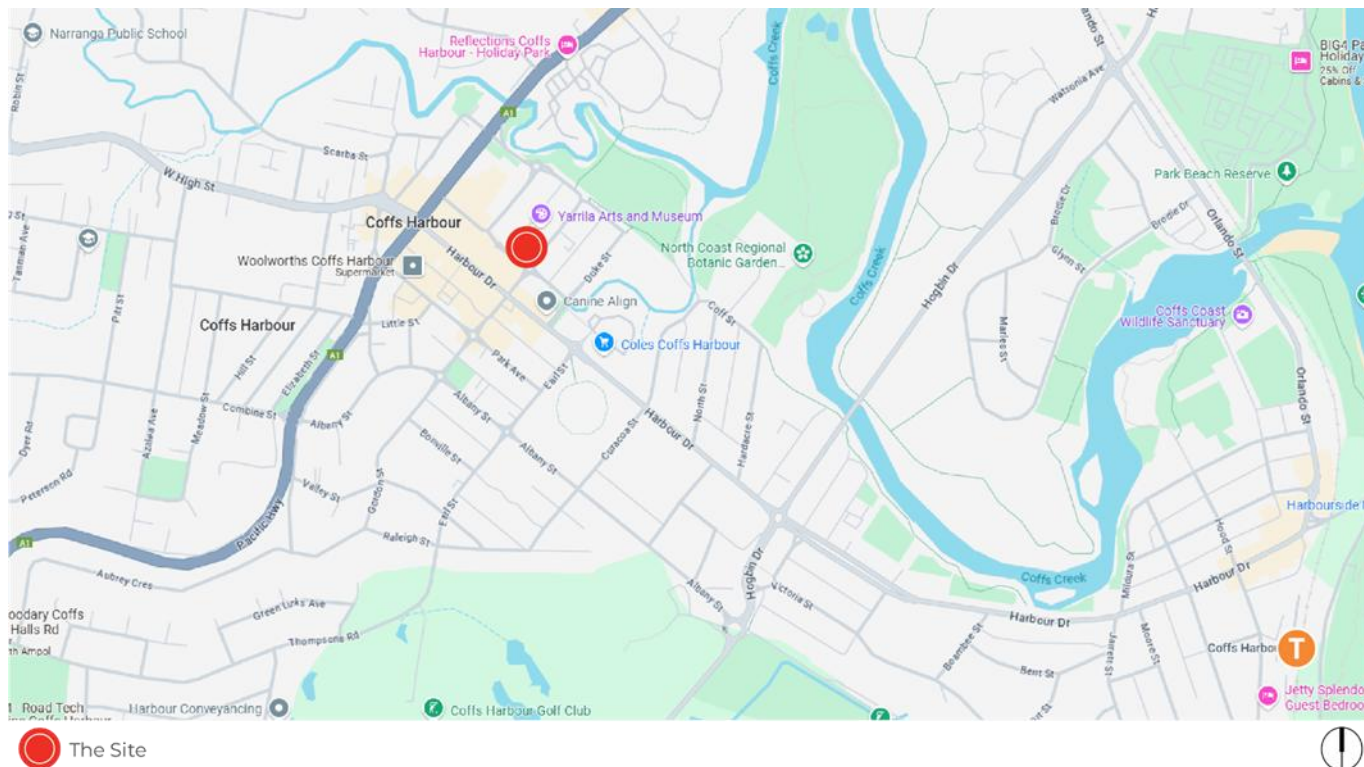


Figure 1 Site Context Map

Source: Nearmap, 2025 (edits by Colliers Urban Planning)

2.2 Site Description

The site (**Figure 2**) is regular in shape, with a site area of 2,023m² and is legally described as Lot 21 DP880214. The site has a frontage to three (3) primary roadways, including a 40m frontage to Gordon Street (east), 50m to Vernon Street (south) and a 40m frontage to Riding Lane (west).

The site is not physically constrained by heritage or significant vegetation and is wholly owned by Uniting Church Australia. The topography of the site is generally level. A Survey Plan has been prepared by Newnham Karl Weir and is provided at **Appendix D**.



 The Site

 NOT TO SCALE

Figure 2 Site Aerial

Source: Nearmap, 2025 (edits by Colliers Urban Planning)

2.3 Existing Development

The existing development on site consists of a single storey, ageing and underutilised church building and a gravel car park (**Figure 3**). The building is partitioned into three segments, including a church hall, soup kitchen, second-hand shop and ancillary offices.



The site as viewed from Vernon Street



The site as viewed from Gordon Street

Figure 3 Existing development photomontage

Source: Colliers Urban Planning

2.4 Access and Transport

2.4.1.1 Vehicular Access

The site is located at the intersection of Gordon Street and Vernon Street, where kerbside parking is permitted on both roads. Riding Lane runs parallel to the western boundary and connects to Coffs Street at the northeast. The existing vehicular access point is on Gordon Street.

2.4.1.2 Pedestrian access

The main pedestrian entrance to the site is currently at Vernon Street in the south-western boundary of the site. Pedestrian access can also be gained from the rear of the site from Gordon Street at the location of the carpark.

2.4.1.3 Public Transport Access

The site lies proximate to multiple frequently serviced bus stops along Park Avenue and Harbour Drive, connecting the site to major employment or service centres including Coffs Harbour, Woolgoolga, and Grafton.

2.5 Surrounding Development

North

Immediately north of the site is Yarrila Place, a four-storey cultural and civic space housing a museum, art gallery, library and council services. Beyond are a number of single and multi-storey commercial buildings, before reaching public recreational areas around Coffs Creek (**Figure 4**).

East

To the east of the site is a mix of single-storey and multi-storey commercial buildings, including several government-operated facilities such as Services Australia at 21–25 Duke Street. Beyond these, the land is primarily government-owned and used for defence and community purposes, eventually giving way to conservation areas around Carralls Gully (**Figure 5**).

South

Immediately south of the site is Coffs Central Shopping Centre, a large commercial complex featuring department stores, restaurants, and a variety of retail outlets. Further south towards Park Avenue, the area is predominantly occupied by single-storey commercial buildings with retail uses (**Figure 6**).

West

Immediately west of the site are car-parking facilities for Coffs Central Shopping Centre. Slightly further is CODA Coffs Harbour, a mixed-use development featuring seven retail premises and 95 residential apartments. Beyond this, the area consists mainly of single-storey commercial buildings along Vernon Street, leading to the Pacific Highway (**Figure 7**).



Yarrila Place, which borders the north-east boundary of the site



Commercial buildings towards the end of Gordon Street

Figure 4 *Northern surrounding development photomontage*

Source: Colliers Urban Planning, Google Maps



Commercial buildings opposite the site on Gordon Street



Further West, Carralls Gully

Figure 5 *Eastern surrounding development photomontage*

Source: Google Maps



Coffs Central Shopping Centre, slevled by residential apartments.



Commercial buildings on Park Avenue

Figure 6 *Southern surrounding development photomontage*

Source: Google Maps



Car-parking facilities for Coffs Central Shopping Centre



C.ex Coffs

Figure 7 *Western surrounding development photomontage*

Source: Google Maps

2.6 Emerging Context

2.6.1 Strategic Density and Land Use Vision

The *Coffs Harbour City Centre Masterplan 2031* (the **Masterplan**) and the *Coffs Harbour Local Strategic Planning Statement 2020* (**LSPS**) identify the site within the City Centre's Civic Cultural Hub, a precinct intended to deliver community-focused services supported by strong pedestrian links, green spaces and public parking. The Masterplan envisages increased development capacity in this location, enabling medium- to large-scale development with greater height and density to reinforce the role of the City Centre as the region's core.

The LSPS further positions the City Centre as a continuing planning priority, directing investment toward renewal, public domain improvements, transport upgrades and new cultural and community infrastructure. The proposal is therefore well placed to benefit from and contribute to planned intensification and broader city-shaping initiatives.

The Local Growth Management Strategy (**LGMS**) further provides a growth framework to 2040, promoting a compact city model that consolidates development within existing urban areas, reinforces place outcomes and delivers sustainable housing, social and economic benefits. Key principles include prioritising quality built form and public spaces, walking and cycling networks, design excellence and 20-minute neighbourhoods. Within this context, the City Centre is intended to be strengthened as the region's primary retail, business, cultural and entertainment precinct, supported by increased residential density and diverse housing types.

Together, these strategies clearly support a vision for higher-density mixed-use development in the City Centre, with the proposal aligning with objectives for consolidation, housing diversity, urban renewal and high-quality design.

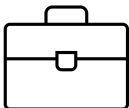
2.6.2 Strategic Planning Context

Table 2 below provides a high-level summary of the strategic policy drivers established by both Council and the NSW State Government as relevant to the proposed development. The proposed development supports key strategic planning moves relating to the following themes:

- Housing supply and diversity.
- Well-connected communities.
- Sustainability and resilience.
- Vibrant local centres.
- Connecting with Country.

Further discussion is provided below. An assessment of the proposal against the relevant strategic planning context is further provided in **Section 5.0** of this report.

Table 2 *Summary of Strategic Context*

Policy theme	Key implications for the site and assessment	Source
Housing Supply and Diversity 	- The NSW Housing Accord's commitment to 377,000 new homes by 2029, with a focus on higher-density housing near transport and amenities, reinforces the need for well-located residential opportunities. - Regional planning priorities for a compact urban form around Coffs Harbour City Centre and Park Beach highlight the importance of integrating housing diversity and mixed-use development into design. - Delivering a range of tenures and affordable rental options for lower-income households aligns with the Regional City Action Plan and should inform housing mix delivery. - With 65% of projected affordable housing demand for smaller dwellings, development should accommodate studio and one-bedroom units alongside family-suited housing. - Increasing housing supply in urban centres supports an ageing population and complements the Compact City growth model, making infill development a strategic priority.	- National Housing Accord (Australian Government, 2022) - North Coast Regional Plan 2041 (NSW Government, 2022) - Coffs Harbour Regional City Action Plan 2036 (NSW Government, 2022) - City of Coffs Harbour Affordable Housing Strategy 2024 (City of Coffs Harbour, 2024)
Well-Connected Communities 	- The NSW Premier's Priorities highlight the need for strong transport connectivity and high-quality public spaces to support higher-density development. Development should integrate landscaped areas, communal spaces, and connections to transport to enhance amenity. - The North Coast Regional Plan 2041 prioritises transit-oriented development and improved connectivity. Design should encourage active transport and ensure proximity to bus services to reduce reliance on private vehicles. - The Coffs Harbour Regional City Action Plan 2036 calls for a modern, place-based transport network and safe pedestrian movement in activity nodes. Development should provide walkable connections and integrate land use with transport planning. - The Coffs Harbour LSPS directs infill development to well-connected locations that avoid environmental constraints. Development, therefore, should deliver a balanced land use mix and promote active living through strong links to services and public spaces.	- NSW Premier's Priorities - North Coast Regional Plan 2041 (NSW Government, 2022) - Coffs Harbour Regional City Action Plan 2036 (NSW Government, 2022) - Coffs Harbour Local Strategic Planning Statement 2020 (City of Coffs Harbour, 2020)
Sustainability and Resilience 	Regional plans emphasise climate change adaptation and sustainable urban development. Proposed new development should prioritise infill development to leverage existing infrastructure, improve public and active transport viability, protect agricultural and environmental land, and reduce long-term servicing costs.	- North Coast Regional Plan 2041 (NSW Government, 2022) - Coffs Harbour Regional City Action Plan 2036 (NSW Government, 2022)
Vibrant Local Centres 	- Sites earmarked in the Coffs Harbour City Centre should support employment and mixed-use clustering to create a vibrant, connected precinct that attracts businesses and residents. - The Pacific Highway bypass provides an opportunity to renew the city spine, with street-level activity and mixed-use redevelopment in buildings that showcase strong design character and community pride. - New supply should contribute to gaps in the residential and mixed-use market through infill.	- North Coast Regional Plan 2041 (NSW Government, 2022) - Coffs Harbour Regional City Action Plan 2036 (NSW Government, 2022) - Coffs Harbour Local Growth Management Strategy 2020 (City of Coffs Harbour, 2020)
Connecting with Country 	The Connecting with Country Framework guides planning and design processes to embed cultural awareness and respect for Country in built environment projects. For the proposed development, this will mean incorporating principles of cultural connection throughout the design	Connecting with Country Framework (NSW Government)

Policy theme	Key implications for the site and assessment	Source
	lifecycle, and ensuring landscaping, public domain treatments, and materiality reflect local context and heritage values.	

2.6.3 Better Placed – An Integrated Design Policy for the Built Environment of NSW

The design process for the proposal has been developed with reference to the NSW Government Architect's (GANSW) integrated design policy 'Better Placed' to ensure the design as documented in the Architectural Drawings and Design Report prepared by Cortese (**Appendix A** and **Appendix B**) is consistent with the objectives of Better Placed. A summary of the proposal's consistency with the principles of Better Placed is provided below.

Objective 1: Better Fit – Contextual, local and of its place

The proposal responds to the surrounding context and its location within the Coffs Harbour City Centre. By proposing a shop top housing development with ground level retail activation, community faith-based facilities, public domain improvements and improved landscaped elements, it will facilitate additional housing supply, while also enhancing the sense of community within the site and the broader Coffs Harbour area.

Objective 2: Better Performance – sustainable, adaptable and durable

The Applicant has ensured that principles of Ecologically Sustainable Development (ESD) have been incorporated into the proposal through the adoption of effective and environmentally responsive design initiatives.

Objective 3: Better for Community – inclusive, connected and diverse

The proposal will strengthen community connections and inclusivity by delivering upgraded faith-based facilities, including a new church and a soup kitchen to support vulnerable residents. These additions will enhance social infrastructure and provide essential services for those in need. The project will also improve local amenity through public domain upgrades such as footpath widening, landscaped elements, and communal spaces, creating a welcoming environment that fosters engagement and wellbeing.

Objective 4: Better for People – safe, comfortable and liveable

The proposal prioritises safety, comfort, and liveability by ensuring secure private spaces and well-designed communal areas. Enhanced visual connections between the built form and streetscape will create an open, inviting environment. Ground-floor activation through retail and faith-based community uses will foster street-level vibrancy and maximise passive surveillance of public and private areas, contributing to a safer and more engaging urban experience.

Objective 5: Better Working – functional, efficient and fit for purpose

The proposal involves the redevelopment of an underutilised site that is not being used to its full potential. Therefore, the provision of residential accommodation and retail, commercial and community tenancies will revitalise the site, while also assisting with alleviating the housing affordability and supply crisis.

Objective 6: Better Value – creating and adding value

As per the above, the proposal creates and adds value to the site by proposing a use that will make better use of the site and meet the demands of the local and extended community.

Objective 7: Better Look and Feel – engaging, inviting and attractive

The proposed development includes active retail and community uses at the ground plane and widened footpaths, along with landscaped elements which make the development engaging, inviting and attractive. This is complemented further by a high-quality design that has been developed by Cortese with peer review input from Matthew Pullinger to ensure an engaging, inviting and attractive development outcome (**Appendix W**).

2.7 Cumulative Impacts

There are no identified nearby future proposals likely to result in cumulative impacts on the subject site.

2.8 Analysis of Alternatives

Redevelopment of the site SSD-91539707 represents the best means of achieving the intended outcomes for the site and has been prepared in response to the key criteria prescribed under the HDA process, including the delivery of a greater quantum of housing in highly accessible locations.

In preparing this report, three (3) options were considered to facilitate the intended outcomes. These are listed and discussed below:

- **Option 1:** Do Nothing;
- **Option 2:** Redevelop the site under the existing planning controls; or
- **Option 3:** The proposed redevelopment.

2.8.1 Option 1 – Do Nothing

Under the 'Do Nothing' scenario, the subject site would continue to be underutilised, and is not considered a realistic or appropriate outcome given the site's strategic location within the Coffs Harbour City Centre and its capacity to accommodate significant housing, retail, commercial, community, and public domain improvements.

Retaining the site in its current underutilised state would fail to address housing supply and affordability needs, deliver public benefits, or respond to the site-specific merit of the site. Over time, the site would increasingly sit at odds with its evolving urban context, which is earmarked to grow as a mixed-use regional city centre.

On this basis, the 'Do Nothing' scenario is not considered to be an acceptable approach.

2.8.2 Option 2 – Redevelop the site under the existing planning controls

Redevelopment under the existing controls would deliver only a modest mixed use outcome, constrained by the 44m height limit. The project team initially explored this pathway and considered a submission based on a 44 m scheme with the 15% affordable housing bonus provided under the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP). However, through discussions with DPHI, it was confirmed that entry into the HDA program provided an opportunity to reconsider the planning controls and test a more ambitious design response consistent with the site's strategic role.

Retaining the existing controls, therefore would have severely capped the amount of housing achievable above non-residential floorspace, preventing the inclusion of affordable housing and falling short of the site's strategic potential. Such an outcome would represent a missed opportunity to address housing demand and affordability pressures, deliver a high-performing built form, include upgraded community facilities. As such, Option 2 was not considered a feasible or viable approach to the site's redevelopment.

2.8.3 Option 3 – The Proposed Redevelopment

Pursuing a rezoning in parallel with a SSDA provides the most efficient and strategically aligned pathway for the site. The revised planning controls will enable a 25-storey mixed-use development, including ground-level retail and community uses, a six-storey podium with commercial floorspace and parking, and 152 residential apartments (comprising both market and affordable dwellings) in the above tower.

The scheme incorporates high-quality design, including a material palette, communal rooftop terrace, landscaped public domain upgrades, and the integration of community and faith-based facilities. This option makes optimal use of the site's strategic location, supports NSW Government housing and economic priorities, and delivers a design-led renewal outcome that will contribute to the long-term vitality and liveability of the Coffs Harbour City Centre.

The proposed redevelopment of the site represents the best means of achieving the intended outcomes for the site and has been prepared in response to the key criteria prescribed under the HDA process, including the delivery of a greater quantum of housing in highly accessible locations.

The proposed development is discussed in detail in the section below.

3.0 Project Description

3.1 Project Overview

The Applicant seeks development consent under 'Division 4.7 – State Significant Development' of the EP&A Act for a contemporary shop top housing development with ground level activated retail and community uses, podium parking and commercial, and above podium residential uses including market and affordable apartments up to 26 storeys, at 19A-21 Gordon Street, Coffs Harbour.

Specifically, this SSDA seeks approval for:

- Site preparation works, including demolition of existing structures, bulk excavation and tree removal.
- Construction and operation of an 26-storey shop top housing development, comprising:
 - 152 residential apartments, including affordable housing (26.3% or 40 dwellings) to be managed by a Community Housing Provider (proposed to be Wesley Mission Community Housing – an entity owned by the Uniting Church) for at least 15 years.
 - Ground floor residential lobby and separate commercial lobby.
 - Three (3) retail tenancies, Wesley Hall Community Kitchen, Place of Worship, Chapel and ancillary faith-based facilities at ground level providing active street frontages along Gordon Street, Vernon Street and Riding Lane.
 - A commercial level.
 - Communal open space located at level 25 for the residential apartments.
- Landscaping and public domain works, including:
 - Incorporation of new trees at street level, deep soil planting and façade edge planting.
 - Inclusion of podium and rooftop terrace, and landscaping.
- Construction of a five (5) storey podium car park which is screened by façade articulation, comprising:
 - Parking for 173 vehicles (including 3 accessible spaces);
 - 5 motorcycles parking spaces;
 - 23 bicycle parking spaces;
- Vehicular access from Gordon Street using the existing access point to the north-east of the site.
- Extension and augmentation of services and infrastructure as required.

The proposed development is described further in the following subsections and is illustrated in the Architectural Drawings prepared by Cortese (**Appendix A**). Further details regarding the proposal are provided in the Design Report prepared by Cortese (**Appendix B**) and the Landscape Design Report prepared by EBLA Studio (**Appendix E**)

Photomontages of the proposed development are provided below at **Figure 8** and **Figure 9**.



Figure 8 *Artistic render of proposed development (as viewed from Vernon Street)*

Source: Cortese



Figure 9 *Artistic render of proposed development as viewed from Riding Lane (left) and Gordon Street (right)*

Source: Cortese

3.2 Key Project Information

3.2.1 Project Details

The key project details regarding the proposal are outlined in **Table 3** below.

Table 3 *Key Project Details*

Component	Description
Proposed Land Use	Shop top housing, places of public worship, retail premises, commercial premises, and community facilities.
Site Address	19A-21 Gordon Street, Coffs Harbour
Legal Description	21/-/DP880214
Site Area	2,023sqm
GFA	
- Community/Retail Premises - Commercial Premises - Residential/Communal	1,173m² 753m² 14,375m²
FSR	8.1:1
Maximum Building Height	88.9m
Apartment Mix – total	152 (100%)
1 bed 2 bed 3 bed	34 (22.4%) 104 (68.4%) 14 (9.2%)
Boundary Setbacks	
(ground floor)	
- North - South - East - West	0m – 5.8m – 16.5m 0m 0m 0m
Car spaces – total	173 vehicles (including 3 accessible spaces)
- Individual Residential Parking - Car Share Residential Parking - Shared Retail, Office & Church Parking	134 spaces 6 Spaces 33 spaces
Motorcycle spaces	5 spaces
Bicycle spaces	23 spaces
Landscaped Area	960m ² (located adjacent to the site boundary)
Estimated Development Cost	\$134,054,643 (Excl. GST) (Appendix FF)

3.3 Design Principles

The following core design principles and urban approaches have been adopted to ensure the overall vision and objectives for the site are achieved:

- **Spirit and Community** – At the heart of this development lies the Church - an open, welcoming space for worship, reflection, and community engagement.
- **Connection to Land, Sea, and Sky** – The architecture and materiality embrace the site's natural elements, framing expansive vistas of the ocean and hinterland, creating spaces for contemplation and reverence.
- **A Place for All People** – Beyond its spiritual function, the development creates a space for everyone in the community. The design emphasises connection through openness and permeability and includes spaces for community gatherings, education, and cultural exchange - blurring the boundaries between the sacred and the civic.

Further commentary and detail on the design principles considered in this proposal is provided in the Design Report at **Appendix B**.

3.4 Connecting with Country

The design of the proposed development has been informed by principles that respect and respond to Country, acknowledging the cultural and environmental significance of the land and its context. The site is located on Gumbaynggirr Country, whose people have maintained a deep and enduring connection to land, sea, and sky for thousands of years.

Connecting with Country for this proposal was undertaken through engagement with GIRA Advisory and the Garlambirla Guuyu-girrwa Elders Aboriginal Corporation, which is detailed in the Connecting with Country Report (**Appendix F**) and the Design Report prepared by Cortese (**Appendix B**). Key Country-centric design considerations included:

- Incorporating species significant to Country, including Red cedar as the dominant canopy tree alongside other Australian hardwoods, supporting biodiversity and biophilia.
- Providing opportunities to incorporate local totems or animals into Riding Lane structures and surface etchings, embedding cultural narratives into the built environment.
- Referencing the pathway to the Yarrila Place fig tree, symbolising continuity and reinforcing the site as a meeting and resting place - particularly meaningful for the new Wesley Hall Soup Kitchen location.
- Supporting natural meeting places through timber seating structures that reflect the natural landscape and offer an appropriate alternative to concrete.
- Enhancing pedestrian comfort and walkability through appropriate planting and, canopy cover and awnings along the Riding Lane, creating a shaded connection toward the river and Yarrila Place.
- Introducing native vegetation to clean stormwater within Riding Lane, allowing it to return safely to the water table.

3.5 Built Form and Layout

The proposal comprises a contemporary 26-storey mixed-use shop-top housing development with a maximum building height of 88.9 m. The built form establishes an active and publicly accessible ground plane, supporting a slender residential tower positioned above a six-storey podium.

3.5.1.1 Lower Ground and Ground Floor

A lower ground level accommodates plant rooms, building services and essential safety infrastructure, ensuring that operational elements are consolidated and visually unobtrusive (**Figure 10**).

At ground level, the development delivers a range of publicly accessible uses, including three retail tenancies, a community kitchen, a place of worship, a chapel and associated faith-based facilities. These uses present active frontages to Gordon Street, Vernon Street and Riding Lane.

Residential and commercial lobbies are located along the ground plane, providing legible entries and facilitating clear separation between uses. The arrangement supports wayfinding for residents, visitors and commercial tenants (**Figure 10**).

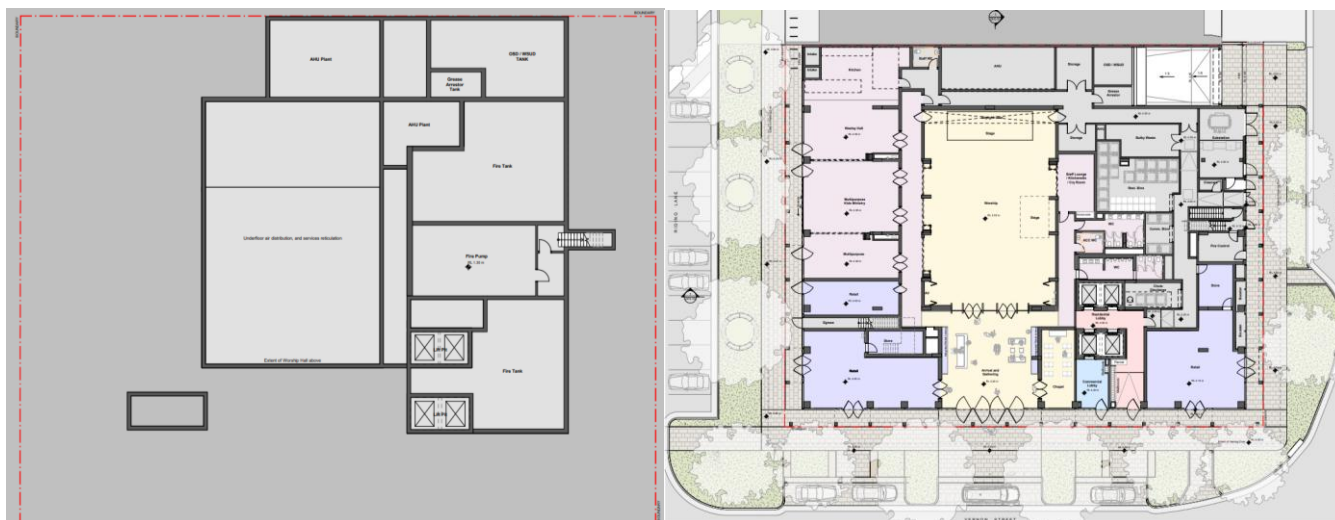


Figure 10 Lower Ground (Left) and Ground Floorplate (Right)

Source: Cortese

3.5.1.2 Podium Design

Levels 1–6 accommodate structured car parking and essential building services, which are enclosed by articulated façade treatments designed to reduce the visual prominence of parking and enhance the overall streetscape presentation (Figure 11). Level 6 also incorporates a commercial floorplate with direct access to a podium rooftop terrace, providing functional outdoor space for commercial tenants (Figure 11).

Boundary setbacks at podium level range from 0 m to 5.8 m along Yarrila Place, responding to site conditions while remaining consistent with the established built form character of the urban centre.

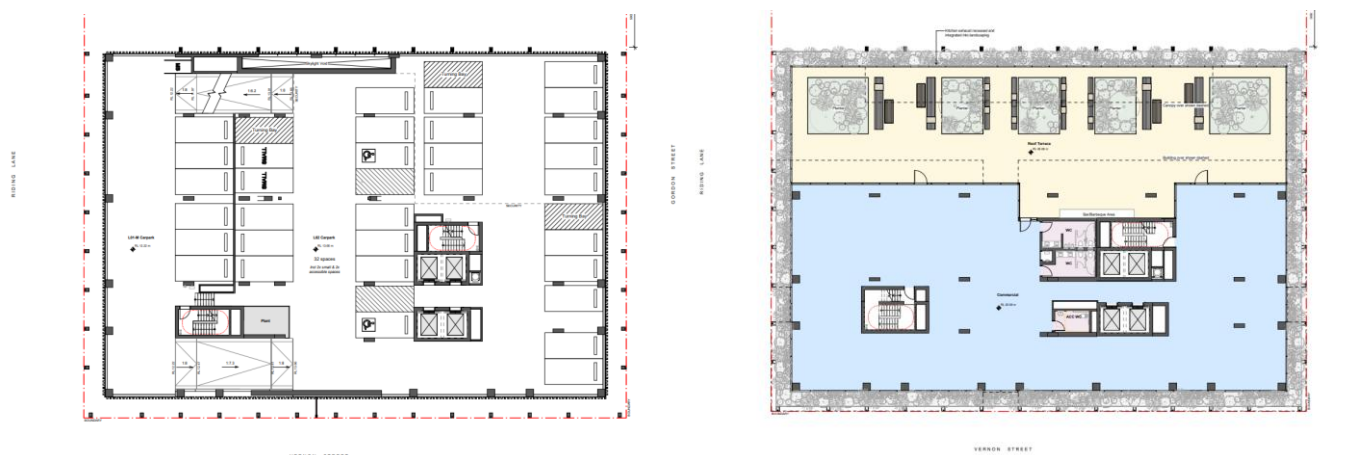


Figure 11 Typical podium floorplate for parking (left) and commercial floor (right)

Source: Cortese

3.5.1.3 Tower Form and Setbacks

The tower rises above as a slender vertical form above the podium, proportioned to reduce visual bulk and minimise potential overshadowing of the surrounding public domain (Figure 12). A setback of 16.5m is provided on the northern tower setback, which provides appropriate separation to Yarrila Place. This ensures adequate visual privacy, reduces overlooking, and maintains a clear spatial break between the civic building and the proposed residential uses.

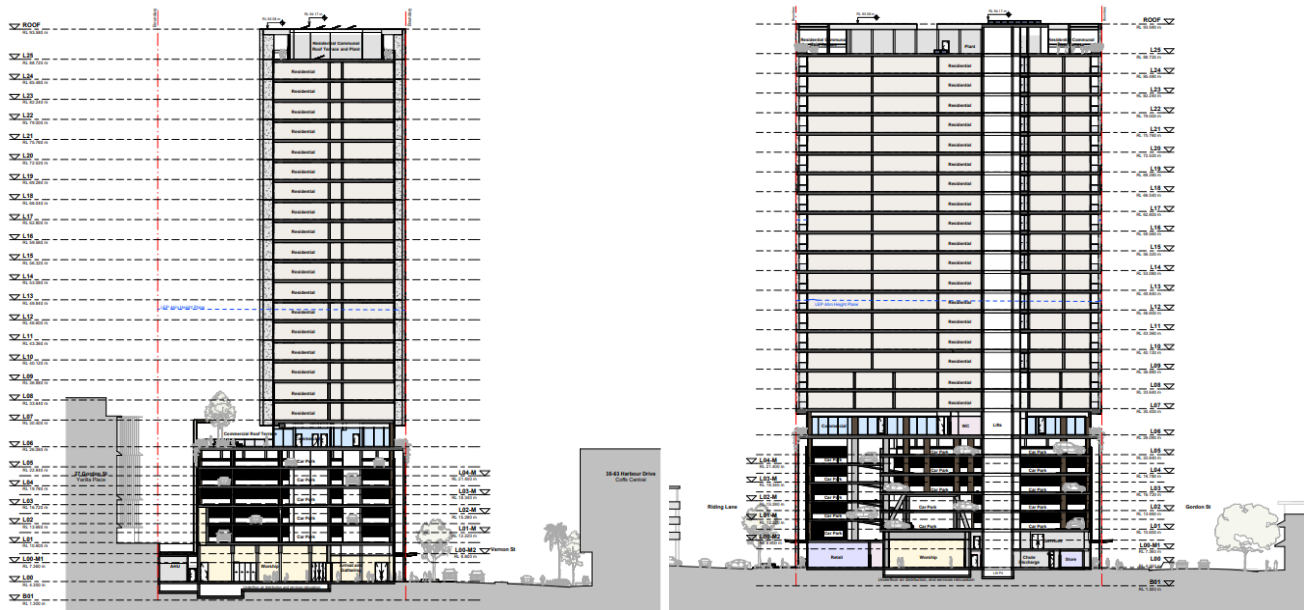


Figure 12 Proposed building as viewed from Riding Lane (left) and Vernon Street (right)

Source: Cortese

3.5.1.4 Residential Apartment Layouts and Mix

The tower accommodates a balanced mix of one-, two- and three-bedroom apartments, providing housing choice for a range of household types. The dwelling distribution aligns delivers a variety of apartment sizes suited to singles, couples, families and downsizers, including:

- 34 one-bedroom apartments
- 104 two-bedroom apartments
- 14 three-bedroom apartments

Typical floorplates are designed to maximise internal amenity through efficient layouts, with primary living spaces oriented towards coastal and hinterland views. Larger three-bedroom apartments are positioned on corner locations to take advantage of dual-aspect opportunities and multiple orientations. One- and two-bedroom apartments are arranged along the longer tower edges to support a slender architectural profile while achieving good solar access and natural ventilation (**Figure 13**).

Further details regarding architectural design, materiality, and landscape integration are provided in **Section 8.1**.



Figure 13 Level 7 & 10 floor plate (left) and Levels 11 to 24 floor plate (right)

Source: Cortese

3.6 Land Uses

A level-by-level summary of the proposed building is provided in **Table 4**. The design of each level is illustrated on the Architectural Drawings at **Appendix A**, with a snapshot of the building layout and further detail on the configuration of uses shown in **Figure 12**.

Table 4 *Key Project Details*

Level	Use
Lower Ground	Storage, plant and building services
Ground Floor	Retail premises, a residential and commercial lobby, a church worship hall with administrative rooms, and ancillary spaces including a community kitchen and chapel, mail/parcel room, storage, waste rooms, and servicing
Ground-Floor Mezzanine	Car parking, lifts, plant and servicing
Level 1 - 6	Car parking, lifts, plant, servicing, commercial*, podium terrace
Level 7 - 10	Affordable Residential
Level 11 -24	Market Residential
Level 25	Communal rooftop open space, plant
Roof	Services, plant, lift overrun, solar panels

*It is noted that preliminary discussions are underway regarding potential tenants for the commercial floor, with early prioritisation for a community housing provider or other faith-based community organisations.

3.7 Landscaping and Public Domain

The landscape design has been prepared by EBLA Studio and is set out in the Landscape Design Report (**Appendix E**). The landscape scheme has been carefully designed to provide a climate appropriate response, with varied experiences and is broken down into the following elements:

- Ground plan.
- Level 6 podium terrace.
- Level 25 communal rooftop terrace.

3.7.1 Ground Plane

The ground plane has been designed to prioritise non-residential uses and activate the surrounding streetscape through retail tenancies, community facilities, and residential and commercial lobbies. Landscaped frontages incorporate deep soil areas along Gordon Street, Vernon Street, and Riding Lane, providing a passive landscaped setting and visual relief to the built form edges. Glazed entrances complement these landscaped areas to maximise transparency and reinforce street-level activation.

Vernon Street is maintained as the site's primary frontage, reflecting the entrance of the Uniting Church. A wide, centrally positioned entrance on Vernon Street provides direct access to the Worship Hall, creating a clear and proportionate arrival point. Residential and commercial lobbies are located along Vernon Street with clearly defined and separated entries to support wayfinding. Retail tenancies are positioned at the site's corners to maximise exposure on dual frontages and improve visibility and passive surveillance along Gordon Street and Riding Lane.

A colonnade is provided along the ground plane, creating a sheltered walkway between the church, retail tenancies, community facilities, and the public realm. The existing driveway that runs parallel to Riding Lane is proposed to be pedestrianised to improve connectivity between Vernon Street and Yarrila Place, forming a landscaped link that supports walkability and legibility within the immediate area. This new extended pathway will include soft landscaping, seating, and informal gathering spaces to accommodate small community activities and enhance the public domain. Large openings

and transparent façades along Riding Lane provide visual and physical connections to the Worship Hall and multipurpose spaces.

Vehicle access is provided via Gordon Street, aligning with the existing entry point and maintaining a consistent entry point with Yarrila Place. A drop-off zone is proposed on Vernon Street, with space allocated for long-wheelbase vehicles serving the church. The substation is located in the north-east corner of the site for optimal connection to existing utility infrastructure.

Further information is provided in **Appendix B**, with photomontage and plan shown in **Figure 14** and **Figure 15**.

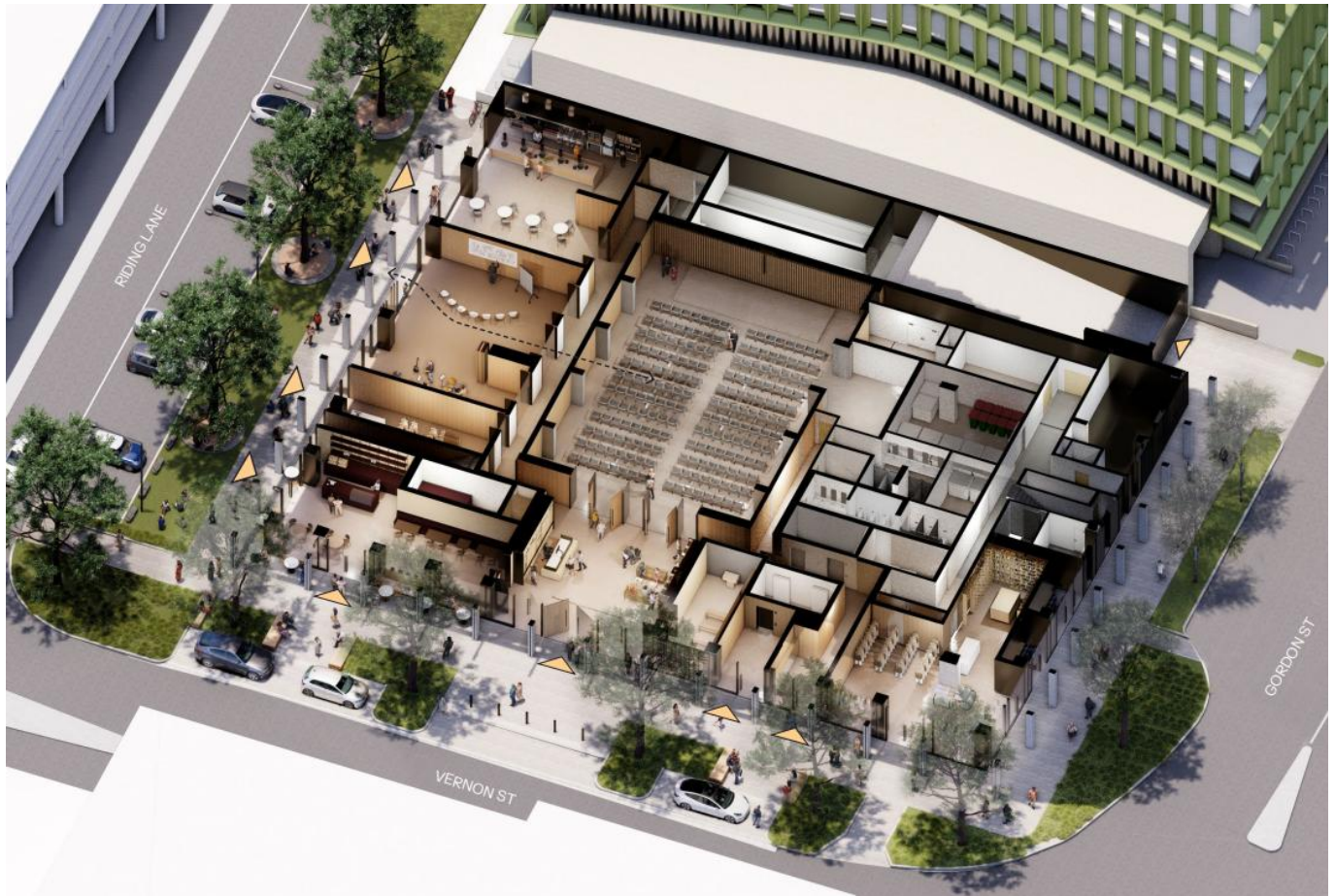


Figure 14 *Photomontage of the public domain*

Source: Cortese

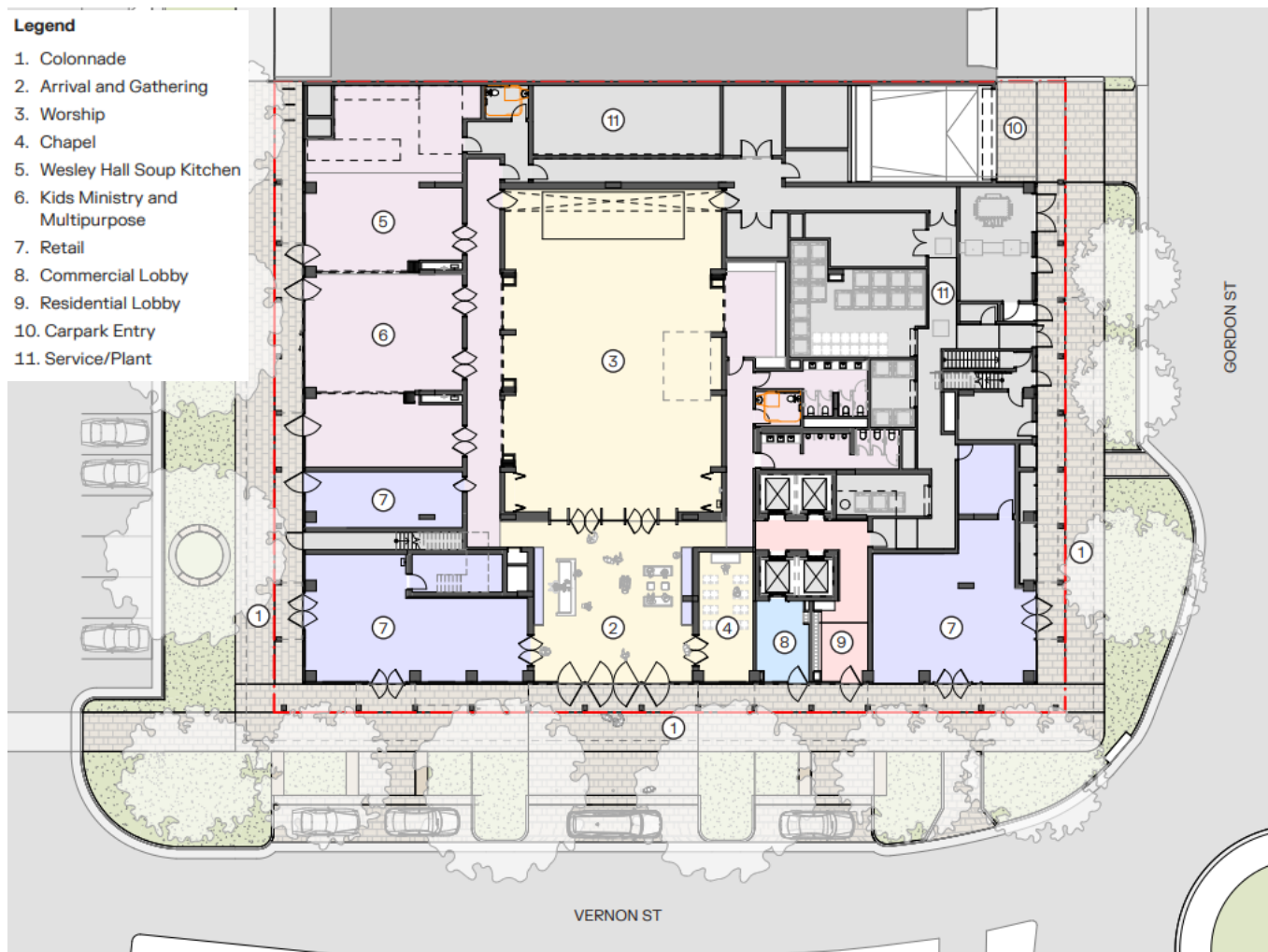


Figure 15 Excerpt of ground-floor plan illustrating the ground plane

Source: Cortese

3.7.2 Level 6 Podium Terrace

Level 6 accommodates an outdoor terrace associated with the commercial floorplate, providing open space for workers. The terrace includes a range of amenities such as seating areas, a barbecue, shade structures, and a bar, as illustrated in **Figure 16**. Generous landscaped zones are integrated along the terrace edges to improve visual amenity, provide wind protection, and maintain privacy for adjoining Yarrila Place (**Figure 17**).

The landscape design incorporates native tree, shrub, and groundcover species to enhance microclimate conditions and contribute to local biodiversity. Planting zones are positioned to deliver shade and create a comfortable environment for informal gatherings, meetings, and events. The arrangement of hard and soft landscape elements ensures functional outdoor spaces that support social interaction and worker wellbeing.



Figure 16 Plan illustrating the Level 6 landscape

Source: Cortese



Figure 17 Photomontage illustrating the view from the podium terrace towards the commercial tenancy

Source: Cortese

3.8 Level 25 communal rooftop terrace.

A communal rooftop terrace is proposed at Level 25 for use by residents, providing space for passive recreation and small gatherings. The terrace includes seating areas, planting zones, and weather protection elements, with views to the surrounding coastline and hinterland. Planting will utilise a consistent palette of native species to provide shade and visual relief while reinforcing ecological connections.

The terrace incorporates a barbecue area, outdoor dining spaces, lounge seating, and a shade structure, complemented by soft landscaping treatments. The design responds to the north, east, and west-facing aspect by maintaining low planting to preserve panoramic views, while a landscaped buffer along the southern edge provides protection from prevailing winds. These elements create a functional and comfortable setting for everyday use.

Further information is provided in **Appendix B**, with photomontage and plan shown in

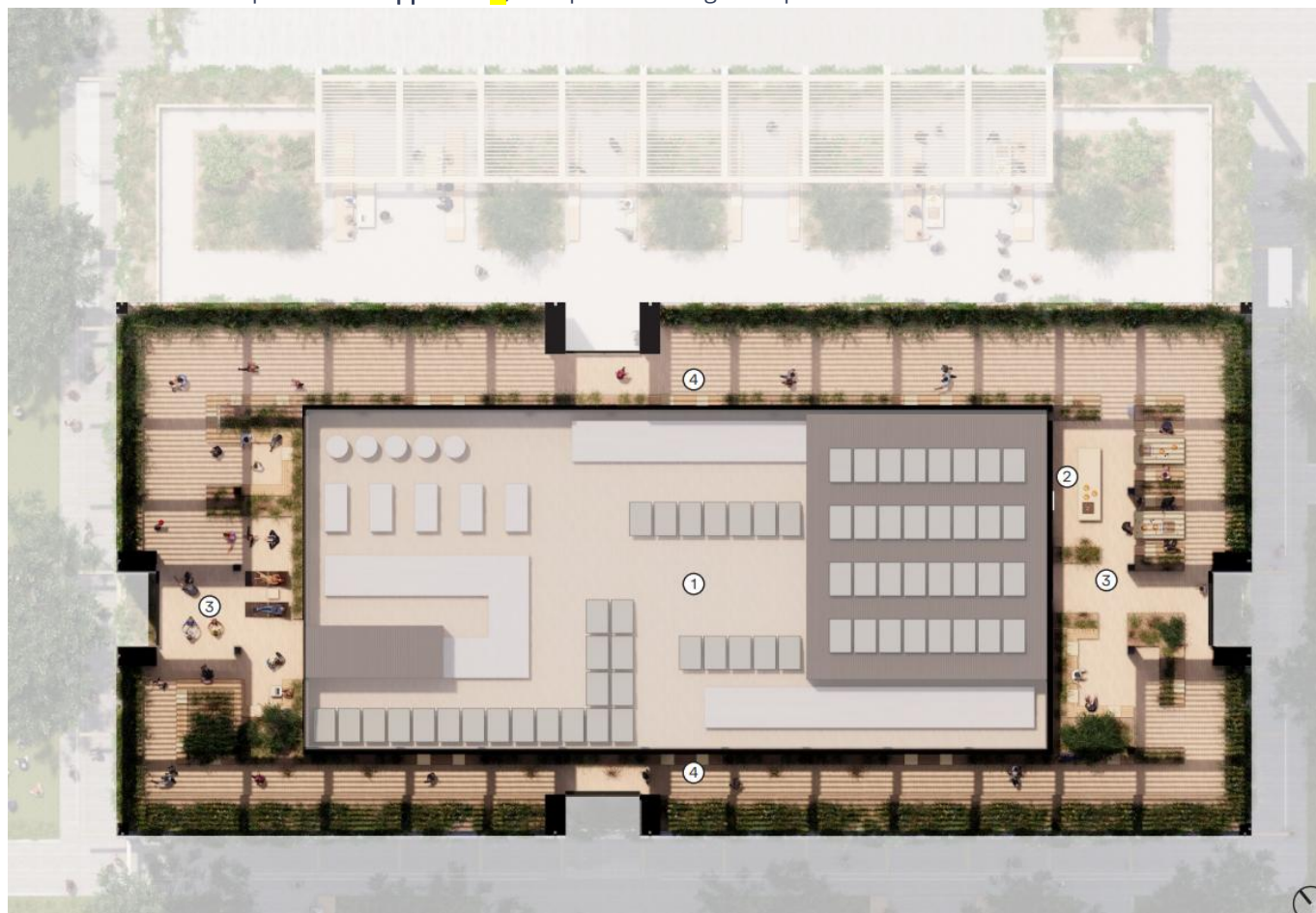


Figure 18 and Figure 19.



Figure 18 Plan illustrating the Level 25 Landscape

Source: Cortese



Figure 19 Photomontage illustrating the view from the rooftop terrace

Source: Cortese

3.9 Façade and Materiality

The building's material and colour palette is designed to complement the Coffs Harbour cityscape and coastal context. The podium incorporates a light grey colonnade with profiled solid and perforated matte black-red metallic screening to provide depth and texture. Ground-level materials have been selected for their durability and tactile qualities, supporting pedestrian use and wayfinding. The podium design references the Australian Red Cedar (*Toona ciliata*), historically

significant to the region for its distinctive deep red tones. Feature finishes identify the entries to the church, commercial, and residential lobbies.

The tower above the podium is articulated in a lighter tone to maintain visual cohesion with the base. Glazed balustrades provide transparency and preserve views toward the hinterland and coastline. Planting on podium edges and terraces introduces greenery to soften the built form and add visual relief. Variations in gloss and texture create shadowing across the façades, contributing to articulation.

The proposed materials and finishes are illustrated in **Figure 20**.

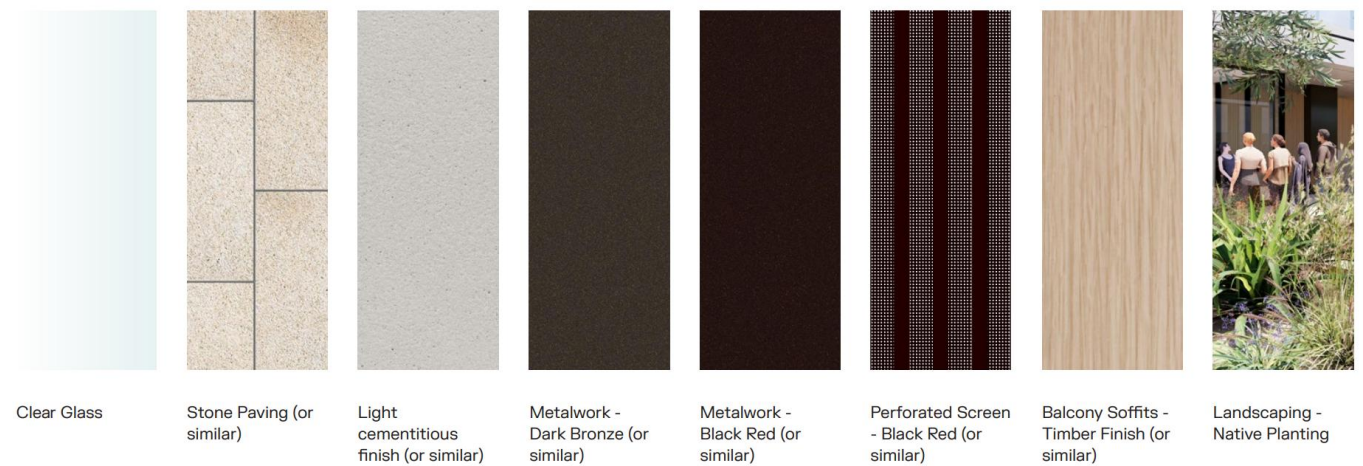


Figure 20 *Materials and Finishes schedule*

Source: Cortese

3.10 Site Access

3.10.1 Pedestrian Access

Pedestrian access to the residential component is provided via a dedicated lobby located on the southern boundary of the building, fronting Vernon Street (**Figure 21**). The commercial lobby is also accessed from Vernon Street, positioned adjacent to the residential entry. Retail tenancies are accessed directly from all street frontages through individual shopfronts. Access to the place of worship, Wesley Hall soup kitchen, and other community spaces is provided from Riding Lane and Vernon Street.

Vertical circulation for the commercial tenants and residents of the building is facilitated by lifts.

3.10.2 Vehicle and Bicycle Access

Vehicular access is provided from Gordon Street at the north-east corner of the site (**Figure 21**). This access point serves the podium car park and accommodates vehicle movement to and from parking levels. The location aligns with the existing access arrangement to minimise functional and visual impacts on the surrounding streetscape. Bicycle access is provided via the residential or commercial lifts, with designated bicycle parking provided within the podium.

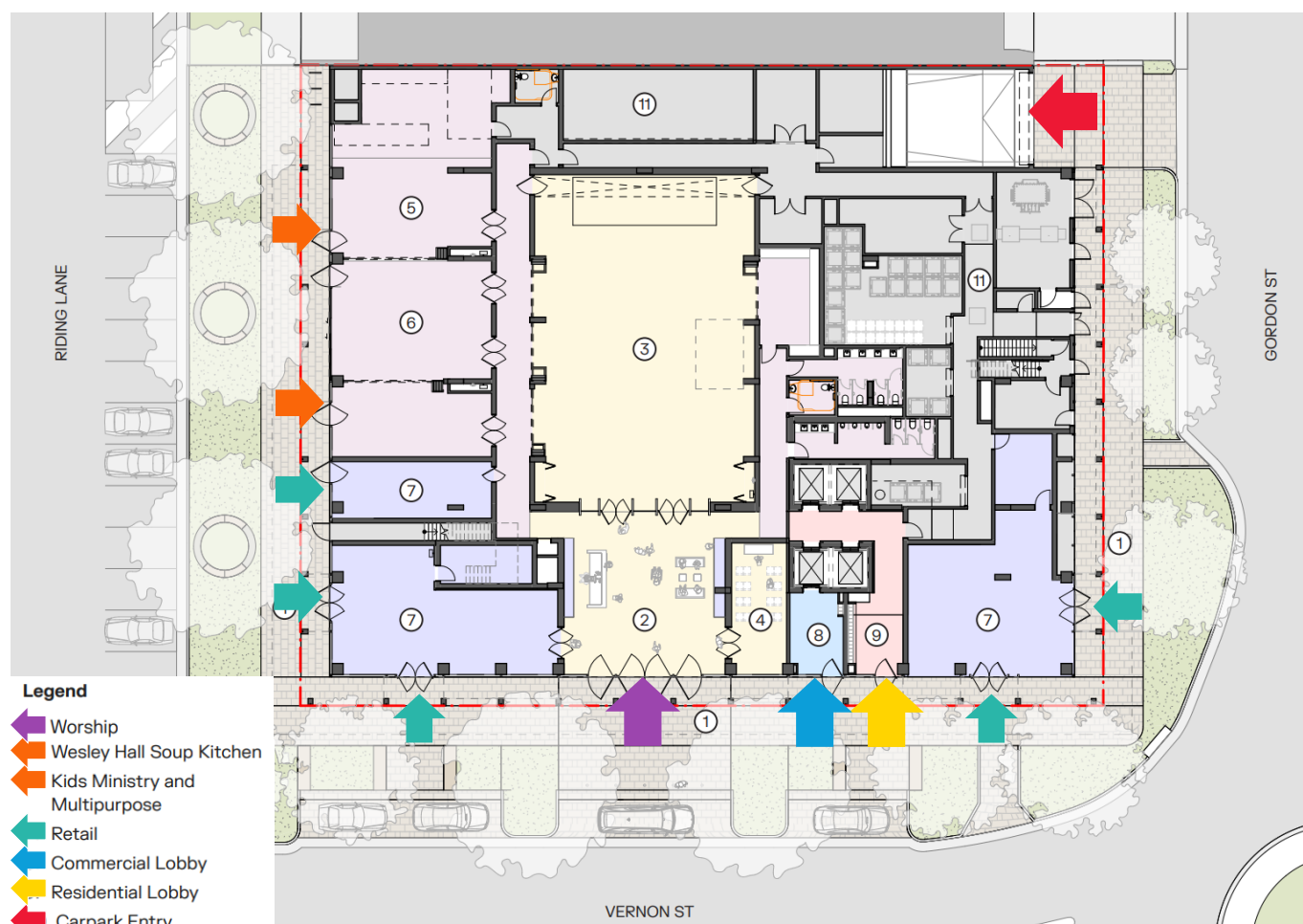


Figure 21 Proposed site access

Source: Cortese

3.11 Site Preparation Works

Site preparation works are required to enable construction of the proposed development. These works include demolition of existing structures and earthworks, as outlined below.

3.11.1 Earthworks and Demolition

Existing buildings, associated footings, buried services, and infrastructure will be demolished and removed prior to construction. Due to the age of the structures, a hazardous materials assessment is recommended before demolition to identify potential contaminants such as asbestos.

An Acid Sulfate Soil Management Plan and a Geotechnical Assessment have been prepared by Regional Geotechnical Solutions (refer to **Appendix G** and **Appendix P**). Standard measures such as silt fencing and runoff control will be installed along site boundaries to prevent sediment entering waterways.

Site preparation will involve removal of vegetation and stripping of topsoil and fill materials. These materials are unsuitable for reuse as engineered fill but may be reused for landscaping. If disposed of offsite, waste classification will be required to determine appropriate disposal methods. Bulk earthworks will include cut and fill to achieve the required finished levels for construction. Cut materials will be assessed for suitability for onsite reuse; unsuitable material will be removed from site in accordance with waste classification requirements.

3.11.2 Tree Removal

The site contains three trees proposed for removal, none of which are deemed to be of high significance. These trees are proposed for removal as part of the broader public domain and accessibility upgrades. To compensate for this loss, the landscape design introduces new large-canopy native species, which will improve canopy coverage and contribute to enhanced ecological function. Refer to the Preliminary Arboricultural Impact Assessment at **Appendix H** and **Section 8.6.1** for further details.

3.11.3 Remediation

A Preliminary (Stage 1) and Detailed (Stage 2) Site Contamination Assessment and an Acid Sulfate Soil Management Plan have been prepared to confirm the site's suitability for the proposed development (refer to **Appendix I** and **G**).

3.12 Construction Management

A detailed Construction Management Plan (**CMP**) will be prepared by the appointed contractor prior to the commencement of works. The CMP will address the following matters:

- Material management;
- Construction traffic management;
- Health and safety;
- Equipment/materials staging and parking;
- Dust control measures; and
- Methods for disposal of demolition waste.

3.13 Staging and Delivery

It is intended that the project is constructed under the one stage. The typical sequence of demolition, excavation and basement construction will take place initially, followed by construction of the mixed-use development activities.

Individual fit outs for the retail uses are proposed to be subject to future detailed fit out and use DAs.

4.0 Proposed Rezoning Amendments

4.1 Objectives and intended outcomes

Objective

This section describes the amendments sought to the CHLEP 2013 to facilitate the proposed development under the Concurrent Rezoning process of the HDA planning pathway. Specifically, consent is sought to:

- Amend the Height of Buildings Map under Clause 4.3 to increase the maximum building height from 44m to 90m.
- Amend the Floor Space Ratio Map under Clause 4.4 to increase the maximum FSR from 4.5:1 to 8.1:1.

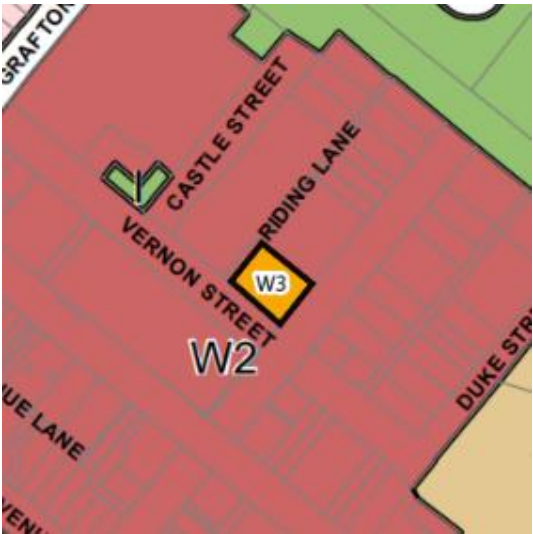
The proposed changes are detailed in **Table 5** below.

Intended outcomes

The intended outcomes of the proposed amendments to CHLEP 2013 are as follows:

- Deliver up to 152 new dwellings, increasing housing supply and diversity, including opportunities for affordable housing, consistent with State and Housing Delivery Authority objectives.
- Provide a high-quality mixed-use development incorporating commercial and retail uses that support local employment and reinforce the role of Coffs Harbour City Centre.
- Establish a built form that responds to local context and amenity through appropriate setbacks, solar access, daylight penetration, wind comfort, and sustainability measures.
- Incorporate a range of apartment types with high levels of amenity, leveraging the site’s strategic location, transport access, and proximity to services and employment.
- Create public benefits through the upgrading of community faith-based facilities, including place of worship, Wesley Hall Soup Kitchen, and Kids Ministry multipurpose spaces, which in turn support social and community needs.
- Deliver a catalyst project that encourages further investment in Coffs Harbour and contributes to its evolution as a vibrant, mixed-use regional city centre.

Table 5 *Proposed amendments to the CHLEP 2013*

Clause	Existing	Proposal
Part 4 Principal development standards		
4.3 – Height of buildings	Existing Height limit of 44m. 	Height limit increases to 90m. 
Figure 22 <i>Existing Height of Buildings Map</i>		Figure 23 <i>Proposed Height of Buildings Map</i>
Source: NSW Planning Portal Spatial Viewer		Source: Cortese

4.4 –
Floor Space
Ratio

Existing Minimum FSR of 4.5:1.



Figure 24 Existing Floor Space Ratio Map

Source: NSW Planning Portal Spatial Viewer

Proposal increases FSR limit to 8.1:1.



Figure 25 Proposed Floor Space Ratio Map

Source: Cortese

5.0 Justification of Strategic and Site-specific Merit

This section outlines the strategic and site-specific justification for the proposed amendments to the CHLEP 2013 as described in **Section 4.0** above, with reference to the SSD-91539707 built form as required. It has been set out in accordance with the relevant matters for consideration within the '*Local Environmental Plan Making Guideline*' prepared by the Department.

5.1 Strategic merit

5.1.1 Section A – Need for the Planning Proposal

Q1. Is the Planning Proposal a result of an endorsed local strategic planning statement, strategic study or report?

The proposed amendments are a direct response to the designation of the site as SSD under the HDA, specifically pursuant to *State Significant Declaration Order (No 4) 2025* issued on 3 April 2025. It directly responds to the objectives of the HDA and National Housing Accord by facilitating the delivery of well-located housing to address the housing crisis.

Furthermore, the Report achieves the intended outcomes for the site and has been prepared in alignment with the key strategic objectives and planning priorities identified in the *Coffs Harbour Regional City Action Plan 2036* and Council's *Coffs Harbour Local Growth Management Strategy 2020*, *INVESTCOFFS Prospectus 2025* and *City of Coffs Harbour Affordable Housing Strategy 2024*. In summary, these include:

- Delivers additional housing supply and diversity, including opportunities for affordable housing, to accommodate projected population growth and improve housing choice within the Coffs Harbour City Centre.
- Strengthens the City Centre's role as the region's economic and service hub by providing retail activation, commercial floorspace, and employment opportunities.
- Enhances community wellbeing and inclusion through the integration of social infrastructure, including a place of worship, Wesley Hall Soup Kitchen, and Kids Ministry multipurpose spaces.
- Supports the Compact City approach by facilitating infill development within a strategic location that is close to everyday needs and services.
- Prioritises pedestrian connectivity and creates high-quality public domain outcomes that reinforce the civic purpose and character of the Coffs Harbour City Centre.

Q2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

The proposed amendments represent the best means of achieving the intended outcomes for the site and broader Coffs Harbour City Centre. These amendments have been prepared in response to key criteria prescribed under the HDA process, including the delivery of a greater quantum of housing in highly accessible locations.

In preparing the application, three options were considered to facilitate the intended outcomes, including:

- Option 1: Do nothing;
- Option 2: Redevelop the site under the existing planning controls; and
- Option 3: The Proposed Development.

Refer to **Section 2.8** above for a detailed options analysis.

5.1.2 Section B – relationship to the strategic planning framework

Q3. Will the Planning Proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

The North Coast Regional Plan 2041 (Regional Plan) establishes the overarching land use and growth framework for the Mid North Coast and Northern Rivers, including Coffs Harbour, over the next 20 years. The Regional Plan sets out a vision for healthy, thriving communities supported by a resilient economy and a valued natural environment. It directs growth to established centres such as Coffs Harbour, where housing supply, employment, and infrastructure can be delivered in a coordinated manner.

The proposal is consistent with the following goals and objectives under the Regional Plan, which govern growth and development in the Coffs Harbour LGA (refer to **Table 6**).

Table 6 *Consistency with the Regional Plan's relevant goals and objectives*

Goal	Consistency of the proposal with the relevant goal and objectives
Liveable, sustainable and resilient	- The proposal provides a liveable, sustainable and resilient North Coast by delivering new affordable and market housing supply within a highly accessible, well-serviced location in the Coffs Harbour City Centre. Redeveloping an underutilised site supports a compact urban form and reinforces the Regional Plan's emphasis on directing growth to infill areas with established services. - A varied mix of apartments is complemented by essential community facilities, including a place of worship, the Wesley Hall Soup Kitchen, and flexible spaces for Kids Ministry, strengthening social infrastructure and supporting an inclusive, resilient community. - Integrated landscaping across the ground plane, podium and rooftop incorporates deep-soil planting, native species and green buffers to enhance urban greening, biodiversity and overall amenity. Connecting with Country principles which have been developed in collaboration with GIRA Advisory and the Garlambirla Guuyu-girwyaa Elders Aboriginal Corporation, ensures cultural values and local knowledge have meaningfully informed the design. - Sustainability measures such as water-sensitive urban design, shaded pedestrian connections, rooftop planting, renewable energy initiatives (including solar), and water-efficient fixtures improve environmental performance, reduce heat impacts and support long-term resource efficiency.
Productive and connected	- The development strengthens the role of the Coffs Harbour City Centre as the region's primary hub for jobs and services by integrating retail tenancies, commercial floorspace and community-serving uses that collectively generate employment and support ongoing economic activity. The co-location of these uses with residential apartments reinforces a compact, mixed-use urban form, encouraging walkability and reducing reliance on private vehicles through close proximity to employment, services and public transport. - Connectivity is further enhanced through the pedestrianisation of Riding Lane, establishing a landscaped civic corridor linking Vernon Street with Yarrila Place and improving access to key civic and cultural destinations. Active street frontages, including a café, the Wesley Hall Soup Kitchen and flexible spaces for Kids Ministry, promote street-level activity and encourage informal social interaction. - Future mobility needs are supported through the inclusion of electric vehicle charging within podium parking levels, ensuring the development remains adaptable, innovative and aligned with emerging transport technologies.
Growth, change and opportunity	- The proposal meaningfully contributes to the continued renewal of the Coffs Harbour City Centre by delivering a high-density mixed-use development that integrates active ground-floor uses, high-quality communal residential facilities and substantial public domain improvements. - Landscaped terraces, rooftop spaces and community gathering areas enhance amenity and create opportunities for social interaction, supporting a more vibrant and connected urban environment. - The architectural design, characterised by thoughtful materiality, refined façade articulation and the considered integration of Aboriginal narratives, responds to and reinforces the city's historic and evolving character, helping to shape a contemporary and distinctive city centre identity.

The Regional Plan includes local government area narratives that outline priorities tailored to each council. These priorities identify specific directions where the NSW Government will work in partnership with councils to deliver the objectives and actions of the Regional Plan. For Coffs Harbour, these priorities provide a framework to guide further investigations, implementation, and local decision-making.

The proposal's consistency with the objectives and priorities identified for Coffs Harbour is detailed in **Table 7** below.

Table 7 *Consistency with the relevant priorities of the Regional Plan*

Priority	Consistency of the proposal with the relevant priorities
Regional Priorities	- The proposal supports growth in Coffs Harbour by delivering new housing supply within the City Centre, consistent with the priority to manage and support growth in Coffs Harbour as a regional hub anchored by expanding health, education, and creative industry sectors. - By consolidating development on an underutilised site, the scheme complements broader growth areas across the LGA, including Woolgoolga, Toormina, and Sapphire Beach, while reducing pressure on environmentally sensitive locations that sustain agriculture and tourism. This approach ensures housing and employment opportunities are delivered in a coordinated manner within an established urban context.
Liveable and Resilient	- The proposal incorporates sustainable design and landscaping measures that improve resilience to local climate conditions and natural hazards. Planting strategies contribute to biodiversity outcomes, while concentrating housing growth within the City Centre avoids unnecessary encroachment on high-value environmental assets. - These measures collectively support a liveable and resilient urban environment and align with priorities to deliver environmentally sustainable development and climate change mitigation.
Productive and Connected	- The proposal strengthens the role of the Coffs Harbour City Centre as a key employment and service hub by incorporating commercial floorspace, retail tenancies, and community facilities within a mixed-use development. - This outcome complements regional initiatives at South Coffs Harbour and the Airport Enterprise Park by reinforcing compact, connected urban growth in the CBD. The increase in residents and visitors will also support cultural and tourism activities across the LGA, contributing to a vibrant and economically resilient city centre.
Housing and Place	- The proposal delivers a mix of housing types, including opportunities for affordable dwellings, within a compact urban form that reinforces the Coffs Harbour City Centre as a place to live, work, and connect. - By integrating retail, community, and residential uses, the development contributes to placemaking outcomes, supports walkability, and reflects the principles of a 20-minute neighbourhood. These features align with the priority to enable better places through high-quality urban design and active transport, while promoting housing diversity in a strategic location.
Smart, Connected and Accessible (Infrastructure)	- By locating higher-density housing and mixed-use activities within the City Centre, the proposal leverages regional infrastructure investment, including the Coffs Harbour Bypass. It strengthens Coffs Harbour's role as the regional centre by providing housing and employment opportunities in a highly accessible location, supporting stronger economic and social connections with neighbouring LGAs. - This approach ensures growth is coordinated with major transport upgrades and contributes to a more connected and resilient regional network.

Coffs Harbour Regional City Action Plan 2036

The Coffs Harbour Regional City Action Plan 2036 (City Action Plan) underpins the Regional Plan and establishes a vision for the Regional City through a series of goals and priorities. Under this City Action Plan, the site is strategically located within the Coffs Harbour City Centre, a designated focus area for growth and renewal.

The relevant goal and objectives of the City Action Plan that this SSDA gives effect to are outlined in **Table 8** below.

Table 8 *Consistency with the City Action Plan's relevant goals and objectives*

Goal	Consistency of the proposal with the relevant goal and objectives
An inclusive, healthy and cohesive city built from a network of character-filled places	• The proposal reinforces Coffs Harbour City Centre as a vibrant cultural live-work-play hub by integrating residential apartments with retail tenancies and community facilities, including the Wesley Hall Soup Kitchen and Kids Ministry multipurpose spaces. These uses activate the precinct throughout the day and evening, fostering an inclusive and dynamic environment. Public domain improvements, including the pedestrianisation of Riding Lane, landscaped frontages, and a generous colonnade, enhance walkability and create safe, attractive streets consistent with Safer-By-Design principles. • Glazed entries, passive surveillance, high-quality lighting, and seating will further improve safety and encourage informal social interaction. The design embeds Connecting with Country principles through collaboration with local Aboriginal Elders, ensuring cultural narratives are reflected in the architecture and public spaces. Landscaping strategies, including deep soil zones, podium planting, and a communal rooftop terrace, contribute to urban greening and biodiversity, while water-sensitive urban design measures manage stormwater sustainably and strengthen resilience to climate impacts.
A city of connected communities and a gateway to the wider region	• The proposal prioritises connectivity between key destinations within the City Centre, contributing to a legible and integrated transport network that supports the concept of a city spine. By concentrating housing, retail, and community services in a central location, the development reinforces Coffs Harbour's role as the region's primary hub and gateway to surrounding communities. • This strategic positioning promotes economic growth through increased foot traffic, local job creation, and improved housing diversity, while ensuring strong links to regional transport corridors, including the Pacific Highway and Coffs Harbour Airport.
A skilled and innovative city blending work-life balance and subregional cooperation	• Ground-level retail and community facilities, including multipurpose spaces for social programs and faith-based initiatives, will activate the precinct and provide essential services, while the inclusion of affordable housing ensures workers and families can remain close to employment and education opportunities. • By enhancing accessibility and creating a vibrant city centre, the proposal will strengthen Coffs Harbour's role as a subregional hub, attracting investment and supporting economic growth across the North Coast. Its strategic location near major transport corridors further improves connectivity for workers, businesses, and visitors, ensuring the city remains competitive and resilient in a changing economy.
A regional exemplar of coastal, cosmopolitan living set within the green embrace of the Great Dividing Range	• The proposal delivers a high-quality mixed-use development that reflects Coffs Harbour's coastal and green character while contributing to a vibrant city centre. It provides a diverse mix of housing, including market and affordable apartments, supporting housing choice and urban renewal within a sustainable growth footprint. • Generous landscaping, deep soil zones, podium planting, and a communal rooftop terrace will enhance urban greening and biodiversity, creating visual connections to the natural landscape including the Great Dividing Range. Water-sensitive design measures and rainwater harvesting manage stormwater sustainably, improving resilience and reducing maintenance costs. • Furthermore, the building's orientation and façade optimise solar access and natural ventilation, complemented by high-performance glazing and efficient balcony design to reduce heat gain, whilst sustainability initiatives include rooftop solar, EV charging, energy-efficient fixtures, and provision for recycled materials to deliver on carbon-neutrality.

Q4. Is the Planning Proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?

Coffs Harbour Local Strategic Planning Statement 2020

The Coffs Harbour Local Strategic Planning Statement (LSPS) establishes a 20-year vision for the LGA, aligning regional and local strategies to deliver a liveable, sustainable, and prosperous regional city. It identifies the Coffs Harbour City Centre as a key focus for housing and employment growth, supported by a compact urban form and the renewal of underutilised sites.

While the LSPS primarily provides direction for Council, the proposed SSDA is consistent with its intent and priorities. The project aligns with the vision for a vibrant city centre by facilitating urban renewal, increasing housing diversity, and supporting economic activity. Alignment with the LSPS priorities is demonstrated in **Table 8** below.

Table 9 *Consistency with the intent of the LSPS*

Priority	Consistency of the proposal with the priorities intent
Connected	
P4 Deliver and implement urban design initiatives	The proposal adopts a design-led, place-based approach that enhances Coffs Harbour's coastal and green character through high-quality architecture, active street frontages, and native landscaping. It creates a cohesive public realm that promotes walkability, safety, and community interaction, while integrating sustainability measures such as solar access, natural ventilation, and green infrastructure to support a healthy, resilient urban environment as detailed in Section 8.4 . The design aligns with the Better Placed Design Objectives and demonstrates design excellence as detailed in Section 2.6.3 and Appendix B .
Sustainable	
P5 Deliver greater housing supply, choice and diversity.	The proposal delivers a diverse mix of housing, including 1-, 2-, and 3-bedroom apartments, to meet the needs of a changing population. Locating market and affordable homes within the city centre ensures easy access to public transport, services, and employment, reducing car dependency and making efficient use of existing infrastructure. Such apartment typologies have been selected to provide choice and flexibility for an ageing population, young professionals, and families.
P6 Implement actions within the Biodiversity Action Strategy.	The proposal supports biodiversity outcomes through a planting palette dominated by native, low-water, and low-maintenance species, ensuring long-term sustainability with minimal resource demand. Species significant to Country, such as Red Cedar as the primary canopy tree alongside other Australian hardwoods, are incorporated to enhance habitat value and reflect Aboriginal cultural connections as detailed in Section 3.4 . Water-sensitive design measures, including rainwater harvesting and permeable surfaces, contribute to healthy landscapes, mitigate climate impacts, and strengthen ecological resilience.
P7 Protect and conserve the natural, rural, built and cultural heritage of Coffs Harbour	The proposal respects and reinforces Coffs Harbour's natural and cultural heritage by integrating design elements that reflect local character in collaboration with the Garlambirla Guuyu-girrwa Elders Aboriginal Corporation (Appendix F). Landscaping incorporates native species significant to Country, while public spaces provide opportunities for cultural interpretation and community connection as detailed in Section 3.4 .
Thriving	
P10 Implement actions within existing town and city centre masterplans.	The proposal advances the vision of the Coffs Harbour City Centre Masterplan by reinforcing the precinct's civic heart. Positioned between key landmarks including the Coffs Central and Yarrila Place and beside the historic fig tree, the development introduces active, community-oriented frontages, including a café, Wesley Hall Soup Kitchen, and flexible multipurpose spaces. Its massing and streetscape design strengthen Gordon Street as a vibrant, walkable corridor, contributing to a cohesive urban fabric and a connected cultural and civic hub.
P12 Develop and deliver a post-Bypass place strategy for Coffs Harbour City.	The proposal contributes to post-bypass outcomes by activating the City Centre with a mixed-use development that strengthens east-west connections and supports a pedestrian-friendly environment. Public domain improvements, including landscaped frontages and the pedestrianisation of Riding Lane, enhance walkability and create high-amenity streetscapes. These initiatives align with the vision for a vibrant, connected city spine and a safe, accessible urban core.

Coffs Harbour Local Growth Management Strategy 2020

The Coffs Harbour Local Growth Management Strategy (LGMS) provides the evidence base and strategic framework to guide growth in the LGA to 2040. The LGMS indicates that between 10,650 and 13,267 additional dwellings will be required to meet future housing demand. The LGMS, therefore, aims to deliver greater housing supply, increase housing diversity and choice, and create more opportunities for affordable housing to respond to changing population needs.

The proposed development aligns and responds to the subsequent priorities of the LGMS in delivering housing by:

- Delivering the Compact City vision through high-quality, peer-reviewed design that sets a benchmark for architectural excellence and encourages future renewal within the Coffs Harbour City Centre.

- Coordinating housing with infrastructure and services, enabling a well-serviced, high-density development in a strategic location with immediate access to jobs, retail, transport, and community facilities.
- Providing sustainable housing supply, incorporating energy-efficient fixtures, solar panels, adaptable layouts, and naturally ventilated spaces to reduce environmental impact.
- Offering housing choice for all life stages, with 152 apartments in a mix of one-, two-, and three-bedroom configurations, including adaptable units for an ageing population, young professionals, and families.
- Supporting housing affordability, delivering 40 affordable homes managed by an accredited Community Housing Provider (**Appendix KK**), integrated within the development to address rental stress in the LGA

INVESTCOFFS Prospectus

The proposed development is strongly aligned with the vision and objectives of the INVESTCOFFS Prospectus 2025, which identifies the Coffs Harbour City Centre as the primary focus for growth, investment and intensification. The Prospectus promotes a compact, vibrant and economically resilient CBD, underpinned by increased residential density, high-quality design, and activation of the public domain.

A key objective of INVESTCOFFS Prospectus 2025 is to attract private sector investment that supports housing delivery, employment generation and enhanced civic infrastructure within the City Centre. The proposal directly responds to this objective by delivering a substantial mixed-use development, incorporating residential apartments (including affordable housing), retail, commercial and community uses, thereby contributing to a diversified and activated urban environment.

The Prospectus also identifies the importance of design excellence and the creation of a distinctive city identity. The proposed development achieves this through a well-articulated podium and slender tower form, high-quality architectural expression, and strong integration with the public realm, including activation of Riding Lane and Vernon Street. These outcomes reinforce the City Centre's role as a civic and cultural hub and enhance its attractiveness as a place to live, work and invest.

Furthermore, the proposal supports the Prospectus' emphasis on walkability, connectivity and a pedestrian-focused urban environment. By concentrating density within a highly accessible CBD location, the development leverages existing infrastructure, supports local businesses, and contributes to a more sustainable and efficient urban form.

In this context, the proposal represents a catalyst development consistent with the INVESTCOFFS Prospectus 2025 vision, demonstrating how strategic sites within the CBD can deliver housing, economic activity and high-quality urban outcomes, while contributing to the long-term transformation of Coffs Harbour into a leading regional city.

City of Coffs Harbour Affordable Housing Strategy 2024

The City of Coffs Harbour Affordable Housing Strategy 2024 (AHS) provides a framework to address housing affordability challenges across the Coffs Harbour LGA and ensure access to diverse, well-located housing options. It identifies the need for approximately 2,215 additional affordable dwellings by 2041, including social housing, with a focus on smaller dwellings for lone-person households and couples without children. The AHS emphasises private sector delivery, integration with services and transport, and design excellence to create inclusive, sustainable and affordable homes.

The proposed development aligns with the AHS by:

- Delivering 152 apartments, including 40 affordable homes to be operated by a Community Housing Provider (**Appendix KK**) and offered to essential workers such as nurses, police, and firefighters.
- Providing a mix of one, two, and three-bedroom dwellings, with 20% meeting Silver Standard under the Liveable Housing Guidelines and 10% designed to AS1428 adaptable standards, supporting ageing in place and inclusivity.
- Locating housing in a highly accessible City Centre location, close to Coffs Central Shopping Centre, medical facilities, Brelsford Park, and public transport.
- Demonstrating design excellence through high-quality built form, communal spaces such as a rooftop terrace, and upgraded community facilities that foster social connectivity and intergenerational inclusion.
- Strengthening community connection through an integrated mixed-use program combining worship, outreach, and housing, with active public spaces along Riding Lane creating a civic node for the site.

Coffs Harbour City Centre Masterplan 2031

The Coffs Harbour City Centre Masterplan 2031 provides a long-term vision and framework to transform the City Centre into a vibrant, connected, and resilient destination. It aims to deliver world-class design, enhance public spaces, and create a unique and creative streetscape that inspires residents and visitors. The Masterplan focuses on improving access and movement, activating key land uses, and strengthening the City Centre's role as the region's cultural, civic, and economic hub.

The proposed development aligns with the Masterplan by:

- Supporting the Masterplan's goal of a connected City Centre by improving pedestrian accessibility and complementing planned upgrades such as street reconfiguration and bike lane improvements along Gordon Street. The proposal promotes walkability and equitable access for all users.
- Introducing a high-density mixed-use development that reinforces the City Centre's vibrancy through housing, retail, and community facilities. While the site is not specifically identified as a renewal parcel, its proximity to key activation areas such as Yarrila Place ensures strong integration with the broader renewal vision.
- Delivering landscaped frontages, pedestrian-friendly connections, and active street edges that align with the Masterplan's principles for creating safe, inclusive, and attractive public spaces.
- Consolidating housing and services within the City Centre, reducing reliance on peripheral areas and supporting a compact urban form consistent with the Masterplan's objectives for sustainable growth.

Q5. Is the planning proposal consistent with any other applicable State and regional studies or strategies?

NSW Housing Strategy: Housing 2041 (2023)

The NSW Housing Strategy sets out a long-term vision to deliver housing that meets the needs of a growing and diverse population. It identifies four key pillars including supply, diversity, affordability, and resilience, and highlights infill development as a typology to achieve these outcomes.

The proposed development responds to this vision by providing 152 dwellings, 26.3% of which are for the purposes of affordable housing, within the Coffs Harbour City Centre.

National Housing Accord (2022)

The Federal Government announced the National Housing Accord in October 2022, which committed to delivering 1.2 million houses in well-located areas in 5 years starting from July 2024. The Housing Accord lays the groundwork for improving affordability by addressing Australia's housing supply challenges and enabling the delivery of more social and affordable housing. The Housing Accord includes:

- An initial, aspirational national target of delivering a total of one million new, well-located homes over 5 years from 2024, and
- Immediate and longer-term actions for all parties to support the delivery of more affordable homes.

The proposed development is aligned with the National Housing Accord as it seeks to deliver 152 additional infill housing dwellings (of which 40 or 26.3% will be affordable) in a well-serviced location within the next 5 years. As an HDA application, the proposal will quickly facilitate housing development with the intent to commence building within one year of the proposal's achievement of development consent.

NSW Housing Targets (2024)

The NSW Government has released updated five-year housing completion targets for 43 councils across Greater Sydney, Illawarra-Shoalhaven, Central Coast, Lower Hunter, and Greater Newcastle, as well as a single target for regional NSW.

These revised targets replace outdated benchmarks and reaffirm NSW's commitment to delivering 377,000 new homes statewide by 2029 under the National Housing Accord. For regional NSW, a five-year target of 55,000 new dwellings has been set. The Coffs Harbour LGA is included within this target, and the proposed development will contribute to achieving this goal.

Future Transport Strategy 2056

The Future Transport Strategy 2056 sets the vision and direction for NSW transport investment by providing a comprehensive plan that emphasises the creation of connected 30-minute cities and convenient 15-minute neighbourhoods. It includes a movement and place framework to ensure that transport supports the increased accessibility and reduced travel time for residents whilst enhancing the character of the places and communities. The key guiding principles for future transport that are relevant to the site include:

- Successful places: The liveability, amenity and economic success of communities and places should be enhanced by transport; and
- Accessible services: Transport should enable everyone to get the most out of life, wherever they live and whatever their age, ability or personal circumstances.

The site is strategically located within the Coffs Harbour City Centre, offering close proximity to essential services and amenities. Its design will encourage mode shift through walkable access and improved pedestrian connectivity, supporting the Strategy's vision for sustainable and accessible communities.

NSW Net Zero Plan – Stage 1: 2020–2030

The proposed development aligns with the NSW Net Zero Plan by integrating high-performance, climatically responsive design and embedded sustainability measures. Building orientation and façade treatments optimise solar access and natural ventilation, reducing reliance on mechanical systems, while energy-efficient fixtures, rainwater harvesting, and landscaped areas support resource conservation and mitigate heat island effects. Solar power, EV charging provision, and the use of low-impact materials further reduce emissions and promote long-term environmental performance, ensuring compliance with BASIX and NABERS benchmarks.

State Infrastructure Strategy 2022–2042

The proposal aligns with the Strategy's emphasis on place-based planning and integrated land use by delivering housing, jobs, and services in a location with existing infrastructure capacity and public transport access.

Q6. Is the Planning Proposal consistent with applicable State Environment Planning Policies?

The State Environmental Planning Policies directly applicable to the Planning Proposal are identified in **Table 10**

Table 10 Consistency with State Environmental Planning Policies

SEPP	Consistent		N/A	Comment
	Yes	No		
State Environmental Planning Policy (Biodiversity and Conservation) 2021			-	Nil
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008			-	Nil
State Environmental Planning Policy (Housing) 2021	✓			Not relevant to the proposed LEP amendment. The development's residential component has been designed to meet the requirements of the Housing SEPP and the accompanying Apartment Design Guide (ADG). Detailed consideration of key principles has been undertaken, such as apartment size, layout, typology, solar access, natural cross ventilation, communal open space and the like. Refer to Section 6.5.1 and the Design Report for further detail (Appendix B).
State Environmental Planning Policy (Industry and Employment) 2021			-	Future DAs will be assessed under Chapter 3 of the SEPP, where any signage is proposed.

State Environmental Planning Policy (Planning Systems) 2021	-	Nil
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021	-	Nil
State Environmental Planning Policy (Resilience and Hazards) 2021	✓	Refer to the Site Contamination Assessment prepared by Regional Geotechnical Solutions at Appendix I for greater detail.
State Environmental Planning Policy (Sustainable Buildings) 2022	✓	An assessment of the proposed development's consistency with the relevant provisions and controls of the Sustainable Buildings SEPP is provided in the ESD Report provided at Appendix J . A BASIX Certificate and NATHERS Stamped Plans have also been prepared, and are included at Appendix K .
State Environmental Planning Policy (Primary Production) 2021	-	Nil
State Environmental Planning Policy (Resources and Energy) 2021	-	Nil
State Environmental Planning Policy (Transport and Infrastructure) 2021	✓	The proposed planning controls will be considered traffic generating development requiring referral to TfNSW. TfNSW will be consulted with respect to the proposal and the intended access, traffic and parking measures to ensure an appropriate outcome.

Q7. Is the Planning Proposal consistent with the applicable Ministerial Directions (Section 9.1 Directions) or key government priority?

The proposal's consistency with applicable Section 9.1 Directions is assessed in **Table 11**.

Table 11 Assessment of Section 9.1 Directions

Ministerial Direction	Consistent			Comment
	Yes	No	N/A	
Focus area 1: Planning Systems				
1.1 Implementation of Regional Plans	✓			The concurrent rezoning is consistent with the North Coast Regional Plan as discussed in Section 5.1.2 .
1.2 Development of Aboriginal Land Council land			-	Nil
1.3 Approval and Referral Requirements	✓			This direction aims to ensure that LEP provisions encourage the efficient and appropriate assessment of development. The relevant requirements of this direction have been considered in the preparation of this concurrent state-led rezoning.
1.4 Site Specific Provisions	✓			The concurrent rezoning will not create unnecessarily restrictive or complicated planning controls, noting the self-repealing SEPP mechanism.
Focus area 1: Planning Systems – Place-based				
1.5 Parramatta Road Corridor Urban Transformation Strategy			-	Nil

1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan	-	Nil
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	-	Nil
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan	-	Nil
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor	-	Nil
1.10 Implementation of Western Sydney Aerotropolis Plan	-	Nil
1.11 Implementation of Bayside West Precincts 2036 Plan	-	Nil
1.12 Implementation of Planning Principles for the Cooks Cove Precinct	-	Nil
1.13 Implementation of St Leonards and Crows Nest 2036 Plan	-	Nil
1.14 Implementation of Greater Macarthur 2040	-	Nil
1.15 Implementation of the Pyrmont Peninsula Place Strategy	-	Nil
1.16 North West Rail Link Corridor Strategy	-	Nil
1.17 Implementation of the Bays West Place Strategy	-	Nil
1.18 Implementation of the Macquarie Park Innovation Precinct	-	Nil
1.19 Implementation of the Westmead Place Strategy	-	Nil
1.20 Implementation of the Camellia-Rosehill Place Strategy	-	Nil
1.21 Implementation of South West Growth Area Structure Plan	-	Nil
1.22 Implementation of the Cherrybrook Station Place Strategy	-	Nil
Focus area 2: Design and Place		
Focus area 3: Biodiversity and Conservation		
3.1 Conservation Zones	-	Nil
3.2 Heritage Conservation	-	Nil
3.3 Sydney Drinking Water Catchments	-	Nil
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs	-	Nil
3.5 Recreation Vehicle Areas	-	Nil

3.6 Strategic Conservation Planning	-	Nil
3.7 Public Bushland	-	Nil
3.8 Willandra Lakes Region	-	Nil
3.9 Sydney Harbour Foreshores and Waterways Area	-	Nil
3.10 Water Catchment Protection	-	Nil
Focus area 4: Resilience and Hazards		
4.1 Flooding	✓	The site falls within the Flood Planning Area, however is not flood affected in the 1% AEP extent. The development is consistent with the relevant flood-related policies, manuals, guidelines, or studies applicable to the site. Further detail is provided in Section 8.5 and in the Flood Assessment Report at Appendix L .
4.2 Coastal Management	-	Nil
4.3 Planning for Bushfire Protection	-	Nil
4.4 Remediation of Contaminated Land	✓	Refer to the Site Contamination Assessment prepared by Regional Geotechnical Solutions at Appendix I for greater detail.
4.5 Acid Sulfate Soils	✓	Site identified as containing Class 4 Acid Sulfate Soils. Refer to the Acid Sulfate Soil Management Plan prepared by Regional Geotechnical Solutions at Appendix G for greater detail.
4.6 Mine Subsidence and Unstable Land	-	Nil
Focus area 5: Transport and Infrastructure		
5.1 Integrating Land Use and Transport	✓	The development will deliver much-needed housing in close proximity to serviced public transport routes, jobs and services. This matter is further detailed in the Traffic and Parking Assessment prepared by TTPA included at Appendix M .
5.2 Reserving Land for Public Purposes	-	Nil
5.3 Development Near Regulated Airports and Defence Airfields	-	Nil
5.4 Shooting Ranges	-	Nil
Focus area 6: Housing		
6.1 Residential Zones	✓	The development is consistent as it broadens housing choice through a mix of apartment types, makes efficient use of existing infrastructure in an established centre, and concentrates growth within the existing urban footprint. This application is a direct response to the designation of the site as SSD under the HDA. It directly responds to the objectives of the HDA and National Housing Accord to build new well-located homes to alleviate the housing crisis. It also promotes good design and does not reduce residential density, with development contingent on adequate servicing arrangements.
6.2 Caravan Parks and Manufactured Home Estates	-	Nil

Focus area 7: Industry and Employment		
7.1 Business and Industrial Zones	✓	The development responds to this focus area by improving the commercial amenity and viability of Coffs Harbour through facilitating renewed future retail spaces to support local jobs and businesses.
7.2 Reduction in non-hosted short-term rental accommodation period	-	Nil
7.3 Commercial and Retail Development along the Pacific Highway, North Coast	-	Nil
Focus area 8: Resources and Energy		
8.1 Mining, Petroleum Production and Extractive Industries	-	Nil
Focus area 9: Primary Production		
9.1 Rural Zones	-	Nil
9.2 Rural Lands	-	Nil
9.3 Oyster Aquaculture	-	Nil
9.4 Farmland of State and Regional Significance on the NSW Far North Coast	-	Nil

Given the above, it is evident that the proposal exhibits strong strategic merit and alignment with the local and broader strategic planning framework.

5.2 Site-specific merit

5.2.1 Section C – environmental, social and economic impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

- The site is located within a fully urbanised and developed town centre, with no remnant vegetation or mapped critical habitat;
- Desktop review and technical assessments confirm there is no presence or likelihood of threatened species, ecological communities, or potential habitat;
- The site is not listed under the NSW Biodiversity Values Map or subject to the Biodiversity Offset Scheme threshold;
- No approvals are triggered under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* or the *Biodiversity Conservation Act 2016 (NSW)*;
- The proposal will not result in any clearing or modification of habitat; and
- On this basis, the proposal will not adversely affect any critical habitat or threatened ecological values.

Q9. Are there any other likely environmental effects as a result of the planning proposal and how are they proposed to be managed?

A detailed assessment of the environmental effects as a result of this proposal is identified in **Section 8.0**.

- A comprehensive suite of technical assessments has been undertaken to assess traffic, noise, contamination, waste, overshadowing, stormwater, and other key impacts;
- All impacts are manageable and can be addressed through design responses and identified mitigation strategies;
- The proposed built form is appropriately scaled and sited, consistent with strategic planning intent; and
- Supporting studies confirm that amenity, traffic, acoustic, and servicing impacts will remain within acceptable thresholds.

Relevant management measures are identified where appropriate and, on this basis, no unacceptable impacts are likely to result from this rezoning request or future development on the site.

Q10. Has the planning proposal adequately addressed any social and economic effects?

Yes, the concurrent state-led rezoning will contribute to a number of positive social and economic effects, including:

- Providing public spaces for gathering, worship, outreach, and connection, fostering relationships between residents, visitors and the broader community.
- Delivery of 152 apartments, including 40 affordable homes managed by a Community Housing Provider (**Appendix KK**) for essential workers, alongside adaptable units and diverse apartment sizes to support ageing in place and social inclusion.
- Over 1,900m² of non-residential GFA to accommodate high-quality community, retail and commercial tenancies or uses, generating construction and ongoing operational jobs that strengthen local economic growth.
- Upgrades to Riding Lane, Vernon Street, and Gordon Street create a vibrant, pedestrian-friendly environment that enhances accessibility, safety, and community life.
- Sensitive height transitions protect solar access, while durable materials, passive design strategies, and native landscaping ensure resilience and environmental stewardship.
- Increased density in a highly accessible location close to public transport, medical facilities, and retail supports sustainable mobility and reduces car dependency.
- Collaboration with Traditional Owners, which has informed the landscape and public domain, embedding cultural values and reinforcing community identity.

The economic and social benefits arising from the proposed development are further assessed at **Section 8.2**.

5.2.2 Section D – Infrastructure (Local, State and Commonwealth)

Q11. Is there adequate public infrastructure for the planning proposal?

- The site is located in a fully serviced urban environment with established infrastructure for water, sewer, stormwater, power, and telecommunications.
- Sufficient public transport capacity is facilitated through the proximity of the site to multiple frequently serviced bus stops along Park Avenue and Harbour Drive, connecting the site to major employment or service centres including Coffs Harbour, Woolgoolga, and Grafton.
- Servicing and infrastructure reports confirm that existing utilities can accommodate the proposed development without the need for major augmentation.
- Traffic and access studies support the proposed parking and circulation arrangements as consistent with local road capacity and design standards.
- The development will provide 26.3% of the residential stock to affordable housing, which will be leased for a period of least 15 years.

5.2.3 Section E – State and Commonwealth Interests

Q12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

The redevelopment of the site has been the subject of significant consultation to date, including with State government agencies. As part of this application, an Engagement Report has been prepared at **Appendix C**, which provides further detail on engagement with community and public authorities.

Where necessary, further consultation with relevant authorities will be undertaken as required in during exhibition and response to submissions phase. State and Commonwealth authorities will have the opportunity to provide comment on this application throughout its formal exhibition process.

5.2.4 Conclusion

The proposed shop-top development, incorporating active ground-floor retail and community uses with residential apartments above, will play a pivotal role in the renewal and activation of the Coffs Harbour City Centre. The proposed amendments to maximum building height and floor space ratio under the CHLEP 2013 are consistent with and advance the strategic vision outlined in the *Coffs Harbour Regional City Action Plan 2036*, *Coffs Harbour Local Growth Management Strategy 2020*, *INVESTCOFFS Prospectus 2025* and *Coffs Harbour Affordable Housing Strategy 2024*, enabling the delivery of 152 dwellings, including 40 affordable homes, in response to the identified need for housing supply and diversity.

This uplift in planning controls facilitates outcomes that would not be achievable under current standards, including affordable housing, high-quality community facilities, and enhanced public domain improvements. By addressing housing, social infrastructure, and economic priorities, the proposal will improve residential and community amenity, create new employment opportunities through retail and commercial uses, and reinforce Gordon Street's role as a key activation spine within the City Centre.

The proposed amendments deliver a coordinated, strategically aligned renewal outcome that enhances housing affordability, supports economic vitality, and strengthens the long-term liveability and resilience of Coffs Harbour's civic heart.

6.0 State Significant Development Statutory Assessment

This section of the Report provides an assessment of the proposal against the relevant sections of the EP&A Act and the relevant EPIs. It has been set out in accordance with the Department’s *State significant development guidelines – preparing an environmental impact statement* (July 2022), which identifies the categories to be used to identify the statutory requirements of a project, being that of the following:

- Power to grant approval (**Section 6.1**);
- Permissibility (**Section 6.2**);
- Other approvals (**Section 6.3**);
- Pre-conditions to exercising the power to grant approval (**Section 6.4**); and
- Mandatory matters for consideration (**Section 6.5**).

This section is complemented by a Statutory Compliance Table included at **Appendix N** that identifies all statutory requirements and where those requirements have been addressed in the Report.

6.1 Power to Grant Approval

Division 4.7 of the EP&A Act establishes a specific system to consider projects classed as SSD. SSD is development deemed to be of State significance and includes projects of a certain value that are being completed on sites regarded as important to the NSW Government.

Section 4.36(3) of the EP&A Act states that:

The Minister may, by a Ministerial planning order, declare specified development on specified land to be State significant development.

The site was declared to be SSD under the HDA, specifically pursuant to State Significant Declaration Order (No 4) 2025 issued on 1 April 2025. The Order states development specified in EOI application 235921 dated 3 February 2025, including development purposes of a shop-top housing with the provision of affordable housing at 19A-21 Gordon Street, Coffs Harbour, is declared to be SSD.

Therefore, the proposed development is SSD by virtue of Ministerial planning order.

6.2 Permissibility

The permissibility of the proposed development considering the proposed land use/s and land zoning is outlined in **Table 12** below.

Table 12 *Permissibility*

Matter	Consideration
Land Use	The proposed development constitutes a <i>place of public worship, residential flat building and commercial premises</i> as defined under the Standard Instrument.
Land Zoning	The site is zoned E2 under the CHLEP 2013. The proposed CHLEP 2013 amendments do not seek to alter the land use zoning at the site.
Permissibility	The proposed uses including <i>place of public worship, residential flat building and commercial premises</i> are explicitly permitted under the E2 Commercial Centre zoning of the site.

6.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in **Table 13** below.

Table 13 Other Approvals

Matter	Consideration																		
Approvals not required for SSD	Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State significant development. The following legislative approvals would otherwise be required if the Project was not State significant. <table> <tr> <th>Legislation</th><th>Approval Otherwise Required</th></tr> <tr> <td>Legislation that does not apply to State Significant Development</td><td></td></tr> <tr> <td>Fisheries Management Act 1994</td><td>No</td></tr> <tr> <td>Heritage Act 1977</td><td>No</td></tr> <tr> <td>National Parks and Wildlife Act 1974</td><td>No</td></tr> <tr> <td>Rural Fires Act 1997</td><td>No</td></tr> <tr> <td>Water Management Act 2000</td><td>Yes</td></tr> </table>	Legislation	Approval Otherwise Required	Legislation that does not apply to State Significant Development		Fisheries Management Act 1994	No	Heritage Act 1977	No	National Parks and Wildlife Act 1974	No	Rural Fires Act 1997	No	Water Management Act 2000	Yes				
Legislation	Approval Otherwise Required																		
Legislation that does not apply to State Significant Development																			
Fisheries Management Act 1994	No																		
Heritage Act 1977	No																		
National Parks and Wildlife Act 1974	No																		
Rural Fires Act 1997	No																		
Water Management Act 2000	Yes																		
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The following table lists legislative approvals that are required for the Project and cannot be refused if the Project is approved. <table> <tr> <th>Act</th><th>Approval Required</th></tr> <tr> <td>Legislation that must be applied consistently</td><td></td></tr> <tr> <td>Fisheries Management Act 1994</td><td>No</td></tr> <tr> <td>Mine Subsidence Compensation Act 1961</td><td>No</td></tr> <tr> <td>Mining Act 1992</td><td>No</td></tr> <tr> <td>Petroleum (Onshore) Act 1991</td><td>No</td></tr> <tr> <td>Protection of the Environment Operations Act 1997</td><td>No</td></tr> <tr> <td>Roads Act 1993</td><td>Yes</td></tr> <tr> <td>Pipelines Act 1967</td><td>No</td></tr> </table>	Act	Approval Required	Legislation that must be applied consistently		Fisheries Management Act 1994	No	Mine Subsidence Compensation Act 1961	No	Mining Act 1992	No	Petroleum (Onshore) Act 1991	No	Protection of the Environment Operations Act 1997	No	Roads Act 1993	Yes	Pipelines Act 1967	No
Act	Approval Required																		
Legislation that must be applied consistently																			
Fisheries Management Act 1994	No																		
Mine Subsidence Compensation Act 1961	No																		
Mining Act 1992	No																		
Petroleum (Onshore) Act 1991	No																		
Protection of the Environment Operations Act 1997	No																		
Roads Act 1993	Yes																		
Pipelines Act 1967	No																		
EPBC Approval	The <i>Environmental Protection and Biodiversity Act 1999 Act</i> (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance. If the proposed development will, or is likely, to impact a matter of National Environmental Significance, then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act. The proposed development is not likely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.																		

6.4 Pre-Conditions to Exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in **Table 14** below

Table 14 Pre-Conditions to Exercising the Power to Grant Consent

Matter	Consideration
<i>Biodiversity Conservation Act 2016</i>	In accordance with this Act, an assessment of any State Significant proposal's biodiversity impacts must be undertaken as part of the provision of any SSDA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required.

Matter	Consideration
	Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the BDAR. Given the site's location within an urban context and the absence of vegetation on the site, the proposed development is not considered to result in any adverse impacts to biodiversity on the site or within the surrounding area. As such, this SSDA is accompanied by a BDAR Waiver issued by the Department on 20 October 2025, which is provided at Appendix O.
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	The <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure in the State. Section 2.48 – Determination of development applications—other development Section 2.48 requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development likely to affect an electrical transmission or distribution network. The application will be referred to the relevant utility providers during the assessment. Section 2.120 – Impact of road noise or vibration on non-road development Section 2.120 requires a consent authority to consider the impacts of road noise and vibration on residential development when adjacent to a road corridor with an annual average daily traffic volume of more than 20,000 vehicles. Gordon Street does not meet this threshold, and therefore that this section does not apply to the proposed development. Refer to Appendix M for further details. Section 2.122 – Traffic-generating development Section 2.122 requires the consent authority to provide the RMS with written notice of the development application for developments considered a 'traffic generating activity'. The proposed development is defined as traffic generating development in accordance with Schedule 3 of the Transport and Infrastructure SEPP, as the site proposes GFA for the purposes of a with 75 or more dwellings with access to a road. As such, the SSDA will require referral to Transport for NSW for comment during the assessment. Further detail is provided in the Traffic Impact Assessment at Appendix M and at Section 9.8.
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	The <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (R&H SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and • If the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose. A Geotechnical Report, Acid Sulfate Soil Management Plan and Contamination Assessment have been prepared by Regional Geotechnical Solutions and are included at Appendix P, G and I. Refer to Section 9.9 for greater detail. Section 6.5 outlines mandatory matters for a consent authority to consider when determining an application for potentially hazardous or offensive development. Chapter 3 applies to any proposals that fall under the policy's definition of 'potentially hazardous industry' or 'potentially offensive industry'. The works proposed as part of this application do not fall within these definitions, and as such, a Preliminary Hazard Analysis is not required. The site is also not adjacent to or on land in a pipeline corridor.

6.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified and considered in **Table 15** below.

Table 15 *Mandatory Matter for Consideration*

Legislation	Matters for Consideration
<i>Environmental Planning & Assessment Act 1979</i>	The proposed development is consistent with the objects of Section 1.3 of the EP&A Act for the following reasons:

Legislation	Matters for Consideration
	• It delivers 152 in-fill apartments, including 40 affordable dwellings, supporting housing supply and affordability for Coffs Harbour's growing population. • It generates additional employment opportunities during construction and ongoing operation of the retail and commercial tenancies. • It incorporates ESD principles through integrated design and operational initiatives. • It provides a public place of worship and retail premises, enhancing community access to essential services. The proposed development is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: • It has been declared to have State significance; • It is not prohibited by an environmental planning instrument; and • It has been evaluated and assessed against the relevant heads of consideration under Section 4.15(1).
<i>Environmental Planning and Assessment Regulation 2021</i>	Part 8, Divisions 2 and 5 of the EP&A Regulation sets out procedures which relate to the preparation and submission of an EIS. This Report has been prepared in accordance with Sections 190 and 192 of Division 5, which relate to the form and content of the EIS. Similarly, this EIS addresses the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious and irreversible environmental damage. In addition, and of particular note to this SSDA, is Section 26 of the EP&A Regulations, which requires the following: <i>26 Information about affordable housing development</i> (1) A development application for development to which State Environmental Planning Policy (Housing) 2021, Chapter 2, Part 2, Division 1, 2 or 5 applies must specify the name of the registered community housing provider who will manage— (a) for development to which Division 1 applies—the affordable housing component
<i>State Environmental Planning Policy (Housing) 2021</i>	The following parts of the Housing SEPP applies to this development: • Chapter 2, Part 2, Division 1 for the purposes of In-fill affordable housing; and • Chapter 4, for the purposes of residential apartment development. An assessment of the proposed developments consistency with the relevant provisions and controls of the Housing SEPP is provided in Section 6.5.1 below and supported by assessment of consistency with the Apartment Design Guide (ADG) at Appendix B.
<i>State Environmental Planning Policy (Sustainability) 2022</i>	The Sustainable Buildings SEPP encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials. The following parts of the Sustainable Buildings SEPP apply to this development: • Chapter 2, Standards for residential development – BASIX; and • Chapter 3, Standards for non-residential development. The relevant standards for BASIX buildings relate to energy and water use and thermal performance. An assessment of the proposed development's consistency with the relevant provisions and controls of the Sustainable Buildings SEPP is provided in the ESD Report provided at Appendix J. A BASIX Certificate and NATHERS Stamped Plans have also been prepared, and are included at Appendix K.
<i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i>	Chapter 2 of the Biodiversity and Conservation State Environmental Planning Policy 2021 (Biodiversity and Conservation SEPP) aims to protect the biodiversity value of trees and other vegetation in non-rural areas. Given the site's location within an urban context and the absence of vegetation on the site, the proposed development is not considered to result in any adverse impacts to biodiversity on the site or within the surrounding area. Accordingly, this SSDA is accompanied by a BDAR Waiver issued by the Department, which is provided at Appendix O.

Legislation		Matters for Consideration
Coffs Harbour Local Environmental Plan 2013	Clause 2.1 Land Use Zones	The site is zoned E2 Commercial Centre, whereby the proposed uses are permissible with consent under the CHLEP 2013 (refer to Section 6.2 above). The proposed uses are consistent with the objectives of the E2 zone in that: • The proposal strengthens the role of the Coffs Harbour CBD as the region's civic, cultural and retail hub by delivering a mix of retail, community, church and residential uses. • It contributes to economic growth and employment through new commercial and retail floorspace while activating the streets with safe, walkable and pedestrian-friendly frontages. • The development delivers 152 new dwellings, including affordable housing, in line with Council's strategic direction for higher-density living in the CBD, providing housing diversity and choice. • It improves the public domain and streetscape through active edges, landscaping and pedestrian links, creating a vibrant and functional centre that supports day and night activity. • The design aligns with the Masterplan and achieves a high standard of urban design, promoting walkability, liveability and a resilient built form.
	Clause 4.3 Height of Buildings	The site is subject to a maximum height of building control of 44m. The concurrent amendments sought to the CHLEP 2013 will increase the maximum building height to 90m. The proposed development is compliant with these proposed new height controls. Refer to Section 4.0 above for detailed discussion on the proposed concurrent rezoning amendments.
	Clause 4.4 Floor Space Ratio	The maximum FSR for the site is 4.5:1. The concurrent amendments sought to the CHLEP 2013 will increase the floor space ratio to 8.1:1. The proposed development is compliant with these proposed new FSR controls. Refer to Section 4.0 above for detailed discussion on the proposed concurrent rezoning amendments.
	Clause 5.11 Bush fire hazard reduction	The site is not identified as bush-fire prone land.
	Clause 5.21 Flood Planning	The proposed development application is supported by a Flood Impact Assessment (Appendix L) which demonstrates the proposal's appropriate adoption of appropriate flood mitigation measures.
	Clause 7.1 Acid sulfate soils	Although the site is identified as Class 4 on the Acid Sulfate Soils Map, the proposed works do not trigger adverse ASS impacts, and the accompanying Acid Sulfate Soil Management Plan (Appendix G) confirms that appropriate management measures are in place to ensure compliance with Clause 7.1.
	Clause 7.2 Earthworks	Consent is sought for all earthworks associated with the proposed development. An assessment against the proposed earthworks is provided within the Geotechnical Assessment (Appendix P).
	Clause 7.9 Airspace operations	The proposal will intrude into the Inner Horizontal Surface of the Obstacle Limitation Surfaces (OLS) for Coffs Harbour Regional Airport by approximately 46.67 metres. While the permanent built form and temporary hammerhead cranes do not penetrate the PANS-OPS surfaces associated with instrument flight procedures, the OLS intrusion triggers the requirement for consultation with Coffs Harbour Airport. No additional aviation hazards or compliance issues have been identified. Refer to the Aviation Safeguarding Assessment prepared by Avlaw Aviation Consulting at Appendix T.
	Cause 7.10 Development in areas subject to aircraft noise	The proposal is not affected by aircraft noise restrictions under Clause 7.10. The Aviation Safeguarding Assessment (Appendix T) adopts the 2014 ANEF chart contained in the <i>Coffs Harbour Airport Master Plan 2019</i>, which shows the ANEF contours extending only marginally north of the airport boundary. Based on this mapping, the entire site is located well outside the applicable ANEF contours within which development restrictions would apply. Accordingly, the assessment concludes that the proposal complies with the aircraft noise provisions relevant to Coffs Harbour Airport.

Legislation	Matters for Consideration
<i>Clause 7.12 Design excellence</i>	The proposal satisfies Clause 7.12, with the design demonstrating a high standard of architectural quality, public-domain enhancement and contextual response consistent with the design excellence criteria, as detailed in the Design Report provided in Appendix B .
<i>Clause 7.13 Coffs Harbour City Centre</i>	The proposal is consistent with Clause 7.13 as it reinforces the primacy of the Coffs Harbour City Centre by delivering employment-generating commercial, retail and community uses within the regional city's core, thereby supporting its role as the principal business, cultural and civic hub. Refer to Section 5.1 for further discussion.
<i>Clause 7.20 Overshadowing of certain public places</i>	The proposal complies with Clause 7.20, with the shadow diagrams and analysis in Section 8.3.2 at Appendix B confirming that City Square remains unaffected between 12:00 pm and 2:00 pm on 21 June and that all overshadowing generated by the development is acceptable and occurs outside the protected public places and protected hours.
<i>Clause 7.21 Minimum building street frontage</i>	The site provides three street frontage exceeding 30 metres within the E2 Commercial Centre zone, enabling a building over 28 metres in height to be accommodated while meeting the clause's objectives for appropriate proportions, privacy, access, and mixed-use development potential.
<i>Coffs Harbour Development Control Plan 2015</i>	Development Control Plans are not a matter for consideration in the assessment of SSDAs by virtue of Section 2.10 of the Planning Systems SEPP, which states that ' <i>Development Control Plans... do not apply to... State significant development</i> '. However, the proposal's consistency with the relevant Development Control Plan provisions has been considered, and an assessment is provided at Appendix U .

6.5.1 State Environmental Planning Policy (Housing) 2021

Chapter 2, Part 2, Division 1 of the Housing SEPP sets out development standards for in-fill affordable housing in NSW. The proposed development includes affordable housing dwellings within a mixed-use building, contributing to housing diversity and affordability in the Coffs Harbour City Centre.

Although the proposal seeks amendments with regard to Height and FSR through the SSD pathway under the HDA, it demonstrates a high level of consistency with the intent of the Housing SEPP, particularly the objectives and controls of the in-fill affordable housing bonus.

The key provisions for in-fill affordable housing of the Housing SEPP have been considered in the preparation of the SSD application and are addressed in **Table 16** below.

Table 16 Relevant provisions of the Housing SEPP under Chapter 2, Part 2, Division 1

Section	Controls	Comment
Section 15A Objective of division	<i>The objective of this division is to facilitate the delivery of new in-fill affordable housing to meet the needs of very low, low and moderate income households.</i>	Satisfied. The proposed development achieves this objective by delivering 40 affordable housing units as part of a diverse residential mix within a well-located, mixed-use building in the Coffs Harbour City Centre. These dwellings will be managed by a Community Housing Provider (Appendix KK) and offered to essential workers on very low, low or moderate incomes.
Section 15A Definitions	-	Noted.
Section 15C Development to which division applies	(1) <i>This division applies to development that includes residential development if—</i> (a) <i>the development is permitted with consent under Chapter 3, Part 4, Chapter 5, Chapter 6 or another environmental planning instrument, and</i> (b) <i>the affordable housing component is at least 10%, and</i> (c) <i>all or part of the development is carried out—</i>	Satisfied. The proposed development is permitted with consent under the CHLEP 2013. It includes 26.3% affordable housing, exceeding the minimum requirement. The site is located within 800m walking distance of land in a relevant zone or an equivalent land use zone (Zone E2 Commercial Centre).

	(i) <i>for development on land in the Six Cities Region, other than in the City of Shoalhaven or Port Stephens local government area—in an accessible area, or</i> (j) <i>for development on other land—within 800m walking distance of land in a relevant zone or an equivalent land use zone.</i>	
	(2) <i>Affordable housing provided as part of development because of a requirement under another chapter of this policy, another environmental planning instrument or a planning agreement is not counted towards the affordable housing component under this division.</i>	It is noted that there are no statutory requirements under another EPI that require land or contributions for affordable housing.
Section 16 Affordable housing requirements for additional floor space ratio	(4) <i>This section does not apply to development on land for which there is no maximum permissible floor space ratio.</i>	Non-applicable. Refer to Section 4.0 for further justification on the proposed permissible FSR.
Section 17 Additional floor space ratio for relevant authorities and registered community housing providers	(1) <i>This section applies to residential development to which this division applies that is carried out—</i> (a) <i>by or on behalf of a relevant authority or registered community housing provider, and</i> (b) <i>on land with a maximum permissible floor space ratio of 2:1 or less.</i>	Not applicable. The site does not have a maximum permissible FSR of 2:1 or less.
Section 18 Affordable housing requirements for additional building height	(1) <i>This section applies to development that includes residential development to which this division applies if the development—</i> (a) <i>includes residential flat buildings or shop top housing, and</i> (b) <i>does not use the additional floor space ratio permitted under section 16.</i>	Non-applicable. Refer to Section 4.0 for further justification on the proposed permissible Height.
Section 19 Non-discretionary development standards	(1) <i>The object of this section is to identify development standards for particular matters relating to residential development under this division that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.</i> (2) <i>The following are non-discretionary development standards in relation to the residential development to which this division applies—</i> (a) <i>a minimum site area of 450m²,</i> (b) <i>a minimum landscaped area that is the lesser of—</i> (i) <i>35m² per dwelling, or</i> (ii) <i>30% of the site area,</i> (c) <i>a deep soil zone on at least 15% of the site area, where—</i> (i) <i>each deep soil zone has minimum dimensions of 3m, and</i>	Noted. Satisfied. The subject site exceeds 450m². Satisfied. The proposed development provides a total landscaped communal open space area of 634m², which equates to 31.3% of the site area (2,023m²). Not applicable. The site is within the context of a commercial centre.

	(ii) <i>if practicable, at least 65% of the deep soil zone is located at the rear of the site,</i>	
	(d) <i>living rooms and private open spaces in at least 70% of the dwellings receive at least 3 hours of direct solar access between 9am and 3pm at mid-winter,</i>	Satisfied. 74% of apartments receive a minimum of 3 hrs solar access on 21 June - mid-winter.
	(e) <i>the following number of parking spaces for dwellings used for affordable housing—</i> (i) <i>for each dwelling containing 1 bedroom— at least 0.4 parking spaces,</i> (ii) <i>for each dwelling containing 2 bedrooms—at least 0.5 parking spaces,</i> (iii) <i>for each dwelling containing at least 3 bedrooms— at least 1 parking space,</i>	Satisfied. Refer to Section 8.7.
	(f) <i>the following number of parking spaces for dwellings not used for affordable housing—</i> (i) <i>for each dwelling containing 1 bedroom— at least 0.5 parking spaces,</i> (ii) <i>for each dwelling containing 2 bedrooms—at least 1 parking space,</i> (iii) <i>for each dwelling containing at least 3 bedrooms—at least 1.5 parking spaces,</i>	Satisfied. Refer to Section 8.7.
	(g) <i>the minimum internal area, if any, specified in the Apartment Design Guide for the type of residential development,</i>	Satisfied. All apartments within the proposed development meet or exceed the minimum internal areas required under the ADG, refer to Appendix B.
	(h) <i>for development for the purposes of dual occupancies, manor houses or multi dwelling housing (terraces)—the minimum floor area specified in the Low Rise Housing Diversity Design Guide,</i>	Not applicable.
	(i) <i>if paragraphs (g) and (h) do not apply, the following minimum floor areas—</i> (i) <i>for each dwelling containing 1 bedroom— 65m²,</i> (ii) <i>for each dwelling containing 2 bedrooms—90m²,</i> (iii) <i>for each dwelling containing at least 3 bedrooms—115m² plus 12m² for each bedroom in addition to 3 bedrooms.</i>	Not applicable.
	(3) <i>Subsection (2)(c) and (d) do not apply to development to which Chapter 4 applies.</i>	Noted.
Section 20 Design Requirements	(1) <i>Development consent must not be granted to development for the purposes of dual occupancies, manor houses or multi dwelling housing (terraces) under this division unless the consent authority has considered the Low Rise Housing Diversity Design Guide, to the extent to which the guide is not inconsistent with this policy.</i>	Not applicable.
	(2) <i>Subsection (1) does not apply to development to which Chapter 4 applies.</i>	Noted.

	(3) <i>Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the residential development is compatible with—</i> (a) <i>the desirable elements of the character of the local area, or</i> (b) <i>for precincts undergoing transition—the desired future character of the precinct.</i>	Satisfied. The Coffs Harbour City Centre is a precinct undergoing transition. The proposed development supports this transition by replacing low-density uses with a high-quality, mixed-use building that aligns with Council's vision and strategic frameworks. The design demonstrates architectural excellence, integrates active street frontages, and contributes to the desired future character of a vibrant, compact city centre.
Section 21 Must be used for affordable housing for at least 15 years	(1) <i>Development consent must not be granted to development under this division unless the consent authority is satisfied that for a period of at least 15 years commencing on the day an occupation certificate is issued for the development—</i> (a) <i>the development will include the affordable housing component required for the development under section 16, 17 or 18, and</i> (b) <i>the affordable housing component will be managed by a registered community housing provider.</i>	Not applicable. Notwithstanding, the affordable housing component will be managed by a registered Community Housing Provider (Appendix KK).
	(2) <i>This section does not apply to development carried out by or on behalf of the Aboriginal Housing Office or the Land and Housing Corporation.</i>	Not applicable.
Section 22 Subdivision permitted with consent	<i>Land on which development has been carried out under this division may be subdivided with development consent.</i>	Noted.

7.0 Stakeholder Engagement

This section describes consultation undertaken and feedback received prior to the lodgement of the Report for the proposal, and engagement to be carried out following the lodgement of the Report. It is supported by an Engagement Report prepared by Colliers Urban Planning at **Appendix C**.

7.1 Engagement Carried Out

Full consideration has been given to the Department SEARs during the consultation for this project, including observance of the *Undertaking Engagement Guidelines for State Significant Projects* (March 2024).

7.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout the preparation of the concurrent Rezoning and EIS process was developed through:

- The identification of neighbours who would be impacted by the proposal, unless mitigation measures were implemented.
- The identification of stakeholders who would have a particular interest in the proposal.
- The identification of stakeholders who would have information of value to the proposal.
- Consultation with the Department.

As a result of the above process, a number of stakeholders were identified for consultation, including:

- Surrounding community, including neighbouring residents and businesses.
- Key local stakeholders and community groups.
- Uniting Church Coffs Harbour congregation.
- Government agencies identified in the SEARs.
- DPHI Officers.
- Coffs Harbour City Council Officers and Councillors.
- Coffs Harbour Airport
- Gurmeh Singh MP (Member for Coffs Harbour – NSW Parliament).
- Pat Conaghan MP (Member for Cowper – Parliament of Australia).

7.1.2 Consultation Methods

As detailed in the Engagement Report at **Appendix C**, a suite of community and stakeholder engagement activities has been undertaken since 2024 to support the proposed development. Engagement was structured in two phases:

Phase 1 – Pre-SEARs Engagement

Focused on ensuring all relevant stakeholders and the community were informed about the proposed development prior to the publication of the SEARs on the NSW Planning Portal. The Applicant sought to provide early notice through direct engagement, ensuring community awareness ahead of any formal announcements or media coverage.

Phase 2 – Post-SEARs Engagement

Focused on consulting stakeholders and the community on the detailed design, providing opportunities for feedback to inform the preparation of the Report for the SSDA.

A summary of the Pre-SEARs engagement consultation methods is provided in **Table 17**. For support materials, refer to **Appendix C**.

Table 17 Pre-SEARs Engagement tools and activities

Tool/activity	Description	How engagement informed the project	Target stakeholders
Collateral			
Community and stakeholder project notification letters (Inform)	Project introduction notification letter with high-level information about the project, planning process, and invitation to community information webinar.	The letter provided an opportunity for key stakeholders and local residents near the site to be made aware of the project and be invited to attend a community engagement event to more about project and provide feedback.	Local residents, landowners and businesses.
Community webinar presentation (Inform)	A presentation (PowerPoint) was developed that provided a high-level overview of the project and its impacts on residents and businesses. The presentation was used for one-on-one stakeholder briefings as required.	Provided visual aids to stakeholders and the community during engagement events and ensured that meaningful feedback could be obtained.	Community who attended the webinar
Direct community stakeholder outreach (Inform)	Copy of community letter was emailed directly to several community stakeholders within an invitation to take part in the engagement process.	Ensured that key stakeholders were made aware of the project and had opportunity to provide feedback or take part in the engagement activities.	• Coffs Harbour Lions Club • Coffs Harbour Men's Shed • Coffs Climate Action Group • Coffs Harbour LGA Residents and Ratepayers Assn • Business & Professional Women (BPW) Coffs Coast • Coffs Harbour Chamber of Commerce
Activities			
Frontline engagement (Inform)	The project team established and maintained a project 1800 number, email address and enquiry database for stakeholders, and monitored and responded to enquiries up until lodgement.	Provided all stakeholders with a direct point of contact for any enquiries and assisted them in understanding the project.	All
Stakeholder briefings/ meetings (Consult)	Following initial outreach to stakeholders, one-on-one project briefings were held with several key stakeholders.	Created an open dialogue between the project team and stakeholders to ask questions and provide feedback.	• Coffs Harbour City Mayor Nikki Williams and General Manager Murray Wood • Coffs Harbour Council Strategic Planning Team including Luke Perry (Group Leader Sustainable Places at City of Coffs Harbour) and Ian Fitzgibbon (Acting Director City Planning & Communities). • Local Federal Member for Cowper, Pat Conaghan, MP • Local Member for Coffs Harbour, Mr Gurmesh Singh MP • DPHI – HDA team • Coffs Harbour Airport • Coffs Ex-serviceman and Women's Memorial Club

Tool/activity	Description	How engagement informed the project	Target stakeholders
			Gowings Coffs Central Central Shopping Centre
Internal UCA community outreach and briefings - project update (Consult)	The Church coordinated internal briefings with internal stakeholders to ensure they were informed about the project concurrently with the broader public.	Created an open dialogue between the project team and stakeholders to ask questions and provide feedback.	- The Uniting Church in Australia Synod of NSW & ACT - Synod of NSW and ACT leadership - Project Development Control Group - Local Coffs Harbour Congregation
Community Information Webinar (Consult)	The project team hosted a 1x hour information session for community members on the 6 August 2025. This provided an opportunity for attendees to learn about the project, meet the project team, provide feedback on key topics and ask questions.	Provided a welcoming forum for community members to be able to find out about the early plans of The Church for the site, ask questions and provide feedback	Engagement catchment, broader local community

7.1.3 Post-SEARs engagement

Following the issue of the SEARs for the proposed development, the Applicant undertook further targeted engagement with relevant stakeholders as the scheme was refined and progressed. Post-SEARs consultation with community members identified the following key themes:

- Broad support for increased development density within the CBD and recognition of the potential economic benefits for local businesses.
- Requests for clarity on the definition and quantity of affordable housing, with some confusion and concern about nearby social housing developments.
- Questions about public parking availability and strong desire to retain existing church volunteer parking spaces; emphasis on sensitive design integration with the surrounding streetscape.
- Deep concern about maintaining church-run community services during construction, with emotional ties to existing programs and services
- Desire for broader community engagement beyond standard SSD practices, and interest in understanding the new HDA pathway and Council's role.

A summary of the Post-SEARs engagement consultation methods is provided in **Table 18**. Supporting consultation materials are included in **Appendix C**.

Table 18 Post-SEARs Engagement tools and activities

Tool/activity	Description	How engagement informed the project	Target stakeholders
Collateral			
Community and stakeholder letters (Inform)	A project update notification letter with further details about the project (Post SEARs), planning process, and invitation to attend an information webinar and drop-in session was distributed via letterbox drop on 7 October 2025 to the same distribution catchment as previously notified pre-SEARs.	The letter provided an opportunity for key stakeholders and residents near the site to be made aware of the project and be invited to attend a community engagement event to learn more about the project and provide feedback.	Residents, landowners and businesses (within engagement catchment).

Tool/activity	Description	How engagement informed the project	Target stakeholders
Community webinar presentation (Inform)	A presentation was developed to provide a more detailed overview of the project and its impacts on residents' post SEARs.	Provided visual aids to stakeholders and the community during engagement events and ensured that meaningful feedback could be obtained.	The community that attended the webinar
Display boards (Inform)	6 x A0 graphically designed display boards were developed to provide an overview of the proposal, planning process, design principles and project and planning timeline. These display board were used on the community drop-in session detailed further below in this table.	Provide a visual aid to drop-in session attendees to step through key features of the project.	The community that attended the drop-in session
Direct community stakeholder outreach (Inform)	A copy of the community letter was emailed directly to several community stakeholders with an invitation to take part in the next stage, post-SEARs phases of the engagement process.	Ensured that key stakeholders were made aware of the project and had the opportunity to provide feedback or take part in the engagement activities.	- Coffs Harbour Lions Club - Coffs Harbour Men's Shed - Coffs Climate Action Group - Coffs Harbour LGA Residents and Ratepayers Assn - Business & Professional Women (BPW) Coffs Coast - Coffs Harbour Chamber of Commerce
Activities			
Frontline engagement and community relations (Consult)	Maintained a general project 1800 number, email address and enquiry database for stakeholders. Monitor and respond to planning-related enquiries up until lodgement.	To ensure that community and stakeholder questions and concerns were adequately addressed and recorded.	All
Internal Uniting Church stakeholder briefings and outreach (Consult)	The project team coordinated follow-up internal briefings with internal stakeholders to ensure they were informed about the project concurrently with the broader public.	Created an open dialogue between the project team and stakeholders to ask questions and provide feedback.	Stakeholders who have been consulted: - The Uniting Church in Australia Synod of NSW & ACT - Synod of NSW and ACT leadership - Project Development Control Group - Local Coffs Harbour Congregation
Community Information Webinar (Consult)	The project team hosted a 1-hour information session for community members on 21 October 2025. This provided an opportunity for attendees to learn about the project, meet the project team, provide feedback on key topics and ask questions.	Provided a welcoming forum for community members to be able to find out about more detailed plans for the site, ask questions and provide feedback.	- Engagement catchment, broader local community - Refer to the community letter invitation catchment.
In-person community drop-in session (Consult)	Project team hosted a 2-hr community drop-in session at the Uniting Coffs Harbour Worship Hall on 22 October 2025. The project information display boards were displayed, and the community were invited to review the boards	Provided an informal setting for people to come and meet the project team and learn about the project. Also offered an alternative format to the online webinar for those who prefer.	All stakeholders and the community.

Tool/activity	Description	How engagement informed the project	Target stakeholders
	and ask questions directly to the project team.		

NOTE: A more detailed summary of discussions between the project team and Government and Council Authorities is provided at **Appendix C**.

This approach follows the *Undertaking Engagement Guidelines for State Significant Projects (2021)* by:

- Engaging with relevant NSW Government agencies, service providers, Council, close neighbours and targeted members of the community who are most likely impacted or interested in the proposal;
- Informing the surrounding community about the site, the proposal and providing opportunities to engage directly with the project team;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be readily understood; and
- Providing channels of communication to gather feedback.

7.2 Engagement to be Carried Out

7.2.1 Exhibition and Assessment

Following its submission, the Department will exhibit the concurrent Rezoning and EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, the Department may require the Applicant to prepare a Submissions Report in response to issues raised. The Applicant and its project team will continue to liaise with the Department and stakeholders during the proposal's assessment to address queries that may arise.

7.2.2 Post Approval

The Applicant will implement post-approval stakeholder consultation strategies in addition to the Condition of Consent requirements. This will include continual liaison with and advisement of construction activities to adjoining landowners as required.

8.0 Assessment of Impacts

This section of the report assesses and responds to the environmental impacts of the proposed SSD. It addresses the matters for consideration set out in the SEARs dated 4 September 2025 (see **Appendix V**). The Mitigation Measures proposed to mitigate any environmental impacts are provided at **Appendix S** and complement the findings of this section.

8.1 Built Form and Urban Design

8.1.1 Layout and Built Form

The scale and composition of the development reflect a balanced approach to renewing the Coffs Harbour City Centre while remaining compatible with the surrounding streetscape and character. The layout and built form have been informed by the Housing SEPP, CHLEP 2013 and the ADG. While DCPs do not apply to SSDAs, the CHDCP 2013 has been considered and is addressed in **Appendix U**.

The development adopts a podium-and-tower arrangement comprising active and community uses at ground level, commercial space and parking within a six-storey podium, and residential apartments above. This configuration clearly separates functions, supports active frontages, and improves pedestrian experience and amenity. These outcomes are illustrated in the Design Report (**Appendix B**) and **Figure 26**.

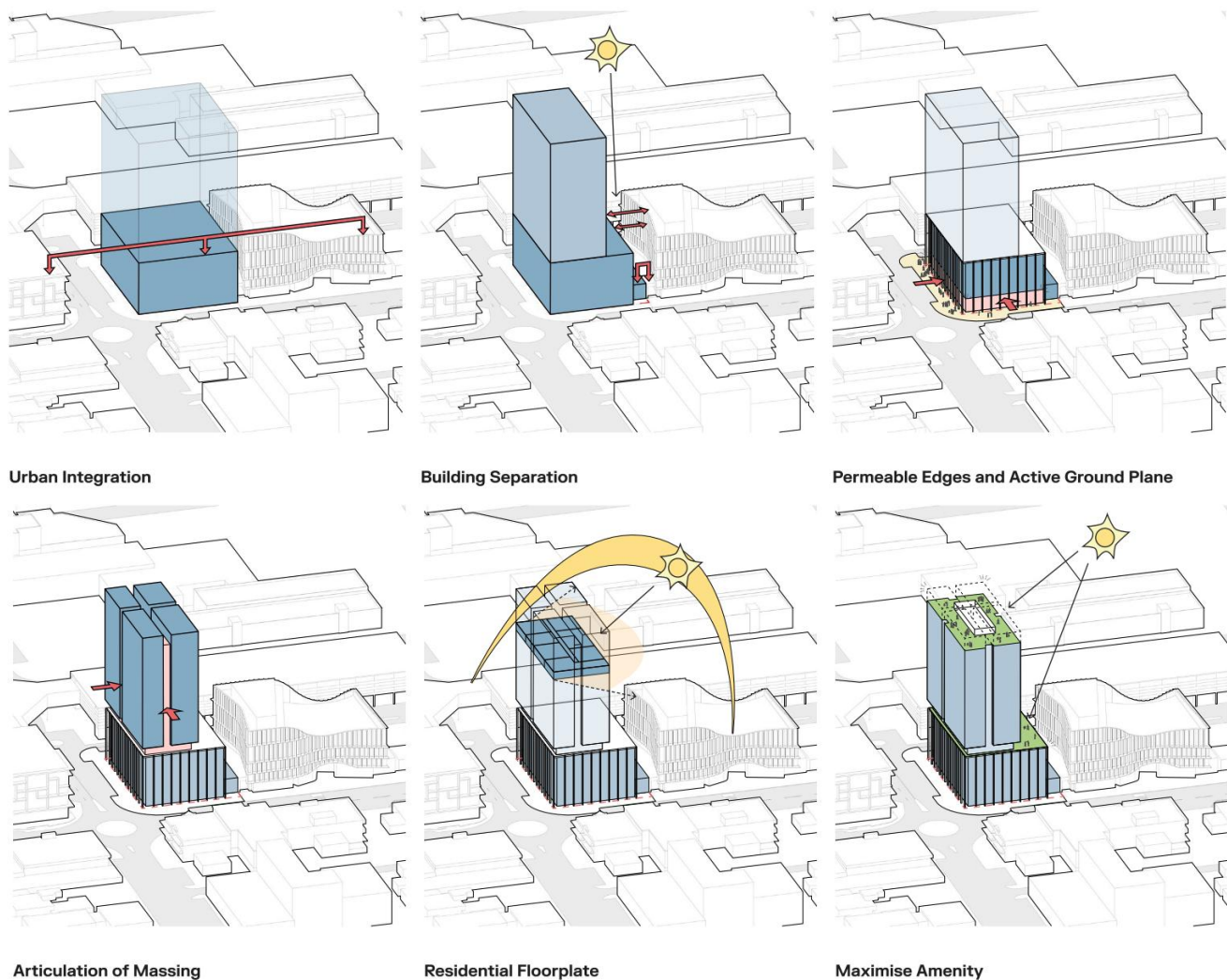


Figure 26 Concept Development

Source: Cortese

The podium establishes a six-storey street wall consistent with the prevailing built form along Gordon and Vernon Streets, delivering a human-scale interface and reinforcing the structure of the surrounding city blocks. Active uses including retail, residential and commercial lobbies, and church spaces front Gordon Street, Vernon Street and Riding Lane,

providing activation and passive surveillance. Servicing and back-of-house areas are consolidated along the northern and eastern boundaries to minimise operational and visual impacts.

Above the ground plane, the podium accommodates five levels of parking, plant and building services, and a landscaped terrace with commercial floor space at Level 6. Parking is fully screened through a tripartite strategy of architectural battens, a colonnade, and integrated landscape planting (**Figure 27**), ensuring visual recessiveness, buffering acoustic impacts, and enabling natural cross-ventilation.



Figure 27 *Proposed podium form and screening*

Source: Cortese

A key driver for locating parking within the podium rather than below ground is the substantial cost differential. Preliminary cost benchmarking indicates above-ground parking costs approximately \$84,000 per space, whereas basement parking costs approximately \$290,000 per space. Given these construction conditions, achieving compliant basement parking would require significant excavation, waterproofing and structural retention. These conditions render basement parking financially prohibitive and incompatible with the viability of a mixed-use project incorporating affordable housing to this extent. The podium strategy therefore provides a practical, deliverable and well-designed alternative that maintains an appropriate interface with the public domain.

Furthermore, the podium design has been developed in consultation with peer-review architect Matthew Pullinger (**Appendix W**), who notes that the approach employs a clear compositional order, establishing a strong, street-defining six-storey civic podium. This helps reduce the perceived building mass and integrates the proposal with the predominantly mid-rise character of the surrounding context, particularly Yarrila Place immediately adjacent.

Rising above the podium, the residential tower presents a slender, articulated form extending 19 storeys above the podium to a maximum height of 88.9 m (**Figure 28**). The architectural expression incorporates varied façade treatments, recessed balconies and a lighter-toned palette to reduce visual bulk and contribute positively to the emerging skyline.



Figure 28 *Proposed tower form and facade*

Source: Cortese

The tower massing is further refined through a recessed junction between the podium and tower, creating a ‘floating’ appearance, while horizontal and vertical articulation divides the tower into four slender elements (**Figure 29**). Level 25 incorporates a landscaped communal terrace with native plantings and outdoor spaces that support social interaction. The tower’s proportion and orientation are consistent with ADG principles, optimising solar access, cross-ventilation and

outlook while managing overshadowing and protecting the amenity of surrounding civic spaces, including those identified under CHLEP 2013 (refer **Section 8.3.2**).



Figure 29 *Proposed floating separation between podium and tower form, as viewed from Vernon Street (left) and Gordon Street (right)*

Source: Cortese

8.1.2 Setbacks

The proposed building setbacks have been designed to respond to the existing streetscape and character of the area while respecting the proximity of Yarrila Place. At ground level, a nil setback establishes a consistent frontage along the three primary interfaces of Gordon Street, Vernon Street, and Riding Lane to activate street edges for maximum engagement with the public domain.

Above the podium, the primary setback to Yarrila Place is upwards of 16 m, reducing perceived bulk and ensuring solar access and visual amenity to the adjacent building. This approach reflects site constraints associated with maintaining appropriate separation to Yarrila Place and provides visual relief while allowing daylight and breezes to flow between buildings. These measures enhance natural ventilation, improve amenity, and contribute to a comfortable microclimate for both sites.

8.1.3 Building Height

The future growth of Coffs Harbour must respond to increasing population demands and housing supply pressures, as outlined in **Section 5.1.2**. The potential future context, illustrated in **Figure 30**, draws on the LGMS 2020 and the Compact City Program, which prioritise urban consolidation, increased density within the City Centre, and efficient use of existing infrastructure to accommodate projected growth. This framework also responds to zoning, building scale and solar access considerations, ensuring a balanced and sustainable urban form that supports the City Centre's strategic role.

The future context demonstrates that building height and density will be concentrated within the CBD core, transitioning to lower-scale forms at the periphery. This establishes a concentric urban structure that supports a compact, walkable and vibrant centre, with anticipated building heights generally ranging from approximately 48m to 110m, subject to site conditions and development feasibility.

The proposed redevelopment responds directly to this framework, enabling a building height of up to 90m. This is consistent with the emerging built form pattern illustrated in **Figure 30**, where comparable sites are capable of accommodating mid- to high-rise development. As a consolidated landholding within the eastern CBD, the site is particularly well suited to deliver increased density and height in accordance with the LGMS intent.

The height has been determined through a design process guided by the following principles:

- A sensitive transition between podium and tower elements to respect the surrounding lower-scale built form while reinforcing the emerging skyline.
- Compliance with ADG objectives for solar access, cross-ventilation, and visual privacy to ensure high-quality residential amenity.
- Alignment with strategic planning priorities to create a landmark building that contributes to the city's identity and supports its role as a regional hub.

- Minimisation of overshadowing impacts on key public spaces, including Harbour Drive and adjacent civic areas, through careful massing and articulation.

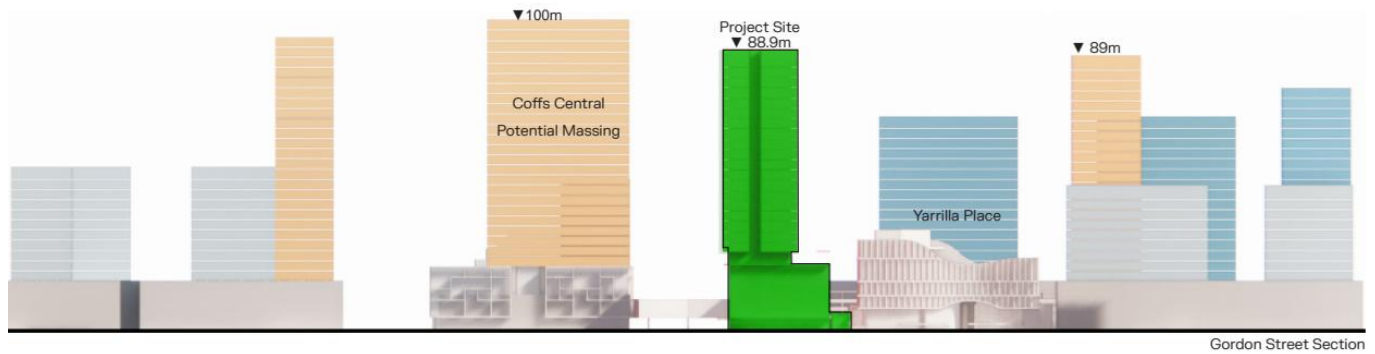


Figure 30 Potential future context of Coffs Harbour

Source: Cortese

Importantly, the proposed height also responds to site-specific constraints, including acid sulfate soils and a high water table, which limit the feasibility of basement construction and necessitate above-ground parking within the podium. This typology reasonably supports modest increases in building height to offset reduced developable capacity at lower levels.

The resulting design incorporates a slender tower form above an articulated and human-scaled podium, ensuring an appropriate transition to surrounding development while contributing positively to the evolving CBD skyline. The proposal aligns with key urban design principles established in the future context, including the concentration of height within the CBD core, active and engaging podium interfaces, high-quality architectural expression, and the protection of amenity through appropriate solar access, view sharing and pedestrian experience.

Furthermore, the proposal is consistent with broader regional trends toward increased building heights in strategic centres to support housing delivery and economic growth. In this context, the proposed building height is appropriate, justified, and necessary to achieve the intended outcomes of the Compact City framework, while contributing positively to the long-term evolution of the Coffs Harbour City Centre.

8.1.4 Alignment with Housing SEPP Bonus Provisions

Under Chapter 2, Part 2, Division 1 of the Housing SEPP, developments providing at least 10% of GFA as affordable housing may access a 30% bonus in height and FSR. The proposed development more than doubles this level by delivering 26.3% of GFA as affordable housing (equivalent to 40 dwellings), which will be managed by a Community Housing Provider (**Appendix KK**) and targeted to essential workers.

A comparison of controls and allowances is provided for reference in **Table 19**:

Table 19 Comparison of Controls and Allowances

Control Type	CHLEP 2013 Base Control	Housing SEPP Bonus (+30%)	Proposed	% Increase vs Housing SEPP Bonus	% Increase vs Base
Height	44m	57.2m	88.9m	57%	104%
FSR	4.5:1	5.85:1	8.1	38%	80%

While the proposal seeks an uplift beyond the Housing SEPP bonus, this additional increase is modest when considered against the public benefits delivered, including:

- 163% more affordable housing GFA than required under the Housing SEPP (26.3% vs 10%), in exchange for 57% and 38% increases in height and FSR.
- Delivery of housing managed by a registered Community Housing Provider (**Appendix KK**), ensuring long-term affordability and security of tenure.
- Enhanced urban design outcomes, including improved public domain, active street frontages, and sustainability measures.

On balance, the proposed amendments represent a reasonable and justified planning outcome, leveraging additional height and FSR to deliver social, economic, and environmental benefits that would not be achievable under current controls or the Housing SEPP bonus alone.

8.1.5 Gross Floor Area

The proposed development incorporates a well-considered floor space configuration that accommodates a mix of land uses and responds appropriately to the site's strategic location within the Coffs Harbour City Centre. The combination of residential, commercial, and community uses is essential to creating a balanced, self-sustaining development that supports the needs of the community.

The proposed FSR provides sufficient capacity to deliver viable residential, commercial and retail floor space that generates employment opportunities, contributes to the local economy and offsets the ongoing operation costs of community infrastructure and affordable housing.

8.1.6 Podium Versus Basement Parking

The Cost Comparison has been prepared by MBM (**Appendix X**), which indicates a substantial difference between above-ground and basement parking options. The above-ground carpark is estimated at approximately \$14.6M, whereas the equivalent basement solution is approximately \$50.1M, representing an uplift of around \$35.6M (over 2.5–3 times more expensive).

This significant cost increase for basement parking is primarily driven by excavation, shoring, groundwater management, and contaminated material treatment, as well as a longer construction program and more complex servicing requirements.

In addition to cost, basement construction introduces greater technical risk, program implications, and construction complexity. In contrast, above-ground parking is materially more cost-effective, quicker to deliver, and carries lower delivery risk.

8.2 Social and Economic Impact

This assessment has been prepared in accordance with the *NSW Social Impact Assessment Guideline* (July 2025) (the Guideline). The assessment considers both positive and negative impacts across the construction and operational phases of the development, recognising that while the development will deliver significant long-term benefits, short-term disruptions may occur during construction.

8.2.1 Social Context and Baseline

The social locality for this assessment is defined as the Coffs Harbour City Centre¹, where the majority of impacts will occur. The broader LGA will also experience impacts due to the regional reach of church programs and services.

Key socio-economic characteristics of the City Centre highlight a community with relatively high levels of disadvantage:

- Population: 6,179; Median age: 43
- Household composition: 34% lone person households; 20% couples with children
- Housing type: 44% medium to high-density dwellings
- Median weekly household income: \$1,115 (NSW average: \$1,849)
- SEIFA Index of Disadvantage: 881 (NSW average: 1,000)

¹.id Community Profile, City of Coffs Harbour – Population Highlights, <https://profile.id.com.au/coffs-harbour/highlights> (accessed November 2025)

These indicators, combined with an identified 2,707 (35.3%) households in rental stress across the LGA², underscore the importance of housing diversity and affordability and community services.

8.2.2 Social Impacts

The development will generate a range of social impacts across construction and operational phases, assessed under the eight categories outlined in **Table 20**.

Table 20 *Likely Social Impacts by Category*

Impact Category	Positive Impacts	Negative Impacts
Way of Life	Improved housing availability through a mix of market and affordable dwellings; new retail and commercial opportunities; community facilities including a church, chapel and soup kitchen.	Temporary disruption to church services and social programs during construction; short-term inconvenience from construction traffic and noise.
Community	Church facilities and community programs will foster social cohesion, strengthen networks, and create a sense of place within the city centre.	Short-term loss of access to community programs during construction may affect vulnerable groups.
Accessibility	Enhanced access to social programs and services, improving wellbeing for disadvantaged households.	Temporary access constraints during construction due to traffic and site works.
Culture	Aboriginal cultural values are embedded in design through the Connecting with Country Report, ensuring cultural responsiveness and response to Country. Refer to Section 3.4 .	No significant negative cultural impacts anticipated.
Health and Wellbeing	Improved physical and mental health outcomes through provision of affordable housing, community infrastructure, and food security programs.	Short-term stress and amenity impacts during construction (noise, dust).
Surroundings	High-quality architecture, landscaping with native species, and public domain improvements will enhance amenity and reinforce the city centre identity. Refer to Sections 3.3 and 0 .	Temporary visual and acoustic impacts during construction.
Livelihoods	Significant employment during construction and ongoing jobs in retail, hospitality, management, and commercial sectors.	Short-term pressure on rental accommodation due to increased construction workforce demand.
Decision-Making	Extensive community engagement informed the design and planning process, exceeding statutory requirements and ensuring transparency. Refer to Section 7.0 .	No negative impacts identified.

On balance, the proposed development is expected to deliver substantial long-term social and economic benefits that outweigh short-term construction-related disruptions. Positive impacts include increased housing diversity (including affordable housing), enhanced community infrastructure, improved access to services, and employment opportunities. These outcomes respond directly to identified social needs in the Coffs Harbour City Centre, particularly high rental stress and socio-economic disadvantage.

While temporary impacts such as disruption to church programs and increased rental demand during construction may occur, these are considered manageable through mitigation measures outlined in **Appendix S**. No significant residual negative impacts are anticipated.

8.2.3 Economic Impacts

The economic impact of the proposed development has been assessed to determine its contribution to housing supply, employment generation, and activation of the Coffs Harbour City Centre. The project will deliver approximately 152

².id Housing Monitor, City of Coffs Harbour – Housing Stress, <https://housing.id.com.au/coffs-harbour/housing-stress/#rental-stress> (accessed November 2025).

dwellings, including affordable housing, alongside retail, commercial, community uses, and public domain improvements. The assessment considers both short-term and long-term economic impacts at local and regional levels.

Table 21 *Likely Economic Impacts by Phase*

Impact Area	Construction Phase	Operational Phase
Employment	Hundreds of direct jobs in construction, engineering, and project management; indirect jobs in supply chains, logistics, and local services.	Ongoing employment in retail, hospitality, commercial management, and building operations.
Local Procurement	Preference for local suppliers and contractors will support regional businesses and stimulate the local economy.	Continued demand for local goods and services through retail and commercial activation.
Housing Supply	Non-applicable	Delivery of diverse housing options, including affordable dwellings, addressing rental stress (42%) and low vacancy rates (1.38%) ² .
Community Activation	Non-applicable	1,173m ² of non-residential GFA will activate the ground plane, attract foot traffic, and support small businesses.
Public Domain	Non-applicable	Pedestrianised Riding Lane and landscaping improvements will enhance connectivity and encourage local commerce.
Economic Resilience	Capital investment during construction strengthens the regional economy.	CHP ownership of affordable housing stabilises the rental market and supports workforce retention.
Public Benefit	Non-applicable	Delivery of faith-based facilities (church, chapel, soup kitchen) and Section 7.11 contributions enhance community assets and support the financing of future infrastructure needs.

The proposed development will deliver substantial economic benefits through job creation, housing supply enhancement, commercial and retail activation, and long-term market stability. These outcomes align with the National Housing Accord, NSW Government priorities for regional housing delivery, and the Coffs Harbour City Centre Masterplan. No negative economic-related impacts are anticipated. Overall, the project represents a strategic investment in the economic growth and social sustainability of the Coffs Harbour City Centre.

8.2.4 Mitigation and Enhancement Measures

To minimise negative impacts and enhance positive outcomes, the development adopts a proactive and proportionate approach to social impact management.

Mitigation measures will include:

- Implementation of traffic and construction management plans to reduce disruption, noise, and dust during the construction phase.
- Clear communication protocols to keep the community informed about temporary changes to programs and services, ensuring transparency and continuity of engagement and support.

Enhancement measures will focus on maximising benefits for the local community and economy, including:

- Prioritising regional procurement to support local businesses and employment.
- Delivering high-quality community facilities and public domain improvements, including landscaped pedestrian connections and activated street frontages in consultation with Coffs Harbour Council.
- Establishing post-occupancy feedback mechanisms for church members and affordable housing residents to ensure ongoing responsiveness to community needs.

8.3 Environmental Amenity

The scale and form of the proposed development do not result in unreasonable impacts on surrounding properties in terms of visual impact, overshadowing, or reflectivity. Supporting analysis is provided in the Design Report (**Appendix B**), the Visual Impact Photomontages and Methodology Report (**Appendix Y**) and the Final Visual Impact Analysis (**Appendix Z**).

8.3.1 Visual Impact

A Visual Impact Assessment (VIA) prepared by Colliers Urban Planning (**Appendix Z**) evaluates the proposal within its surrounding context. The primary visual catchment encompasses a substantial portion of the Coffs Harbour City Centre, extending into open spaces north and south-east, including Fitzroy Oval, the Pacific Highway, the intersection of Harbour Drive and Gordon Street, and Brelsford Park.

The catchment is predominantly urban and non-residential, meaning views of the proposal will be experienced by a range of people, with higher concentrations along major roads and within the city centre. The VIA acknowledges that the proposal introduces a substantial increase in building height, altering the visual character of the area. Four viewpoints were assessed (**Table 22**), with significance ranging from Low to Moderate, indicating that while the development is visible, its impact is acceptable within an evolving city centre context.

Table 22 Visual impact of the proposal on the key viewpoints

Ref	Viewpoint	Sensitivity	Magnitude	Significance
01	Fitzroy Oval	Medium	Considerable	Moderate
02	Pacific Highway	Low	Considerable	Low
03	Intersection Harbour Drive and Gordon Street	Medium	Considerable	Moderate
04	Brelsford Park	Medium	Considerable	Moderate

Proposal Specific Visual Impact Grounds

The VIA concludes that the proposal is acceptable for the following reasons:

- The development is located within an existing city centre and reinforces its role as a regional hub.
- The scale and form are consistent with what could reasonably be expected in an urban renewal context and align with the future character envisaged for Coffs Harbour.
- The proposal consolidates development on an underutilised site, creating visual improvement compared to the current condition.
- Podium articulation and active ground-floor frontages mitigate public realm impacts and enhance street-level experience.
- The tower form is designed to be slender and articulated, reducing perceived bulk and contributing positively to the skyline.

While the proposal introduces a prominent built form, this is consistent with strategic objectives for city centre renewal. The visual impact is considered acceptable given the urban context, design quality, and mitigation measures that enhance the public domain and pedestrian experience.

8.3.2 Solar Access and Overshadowing

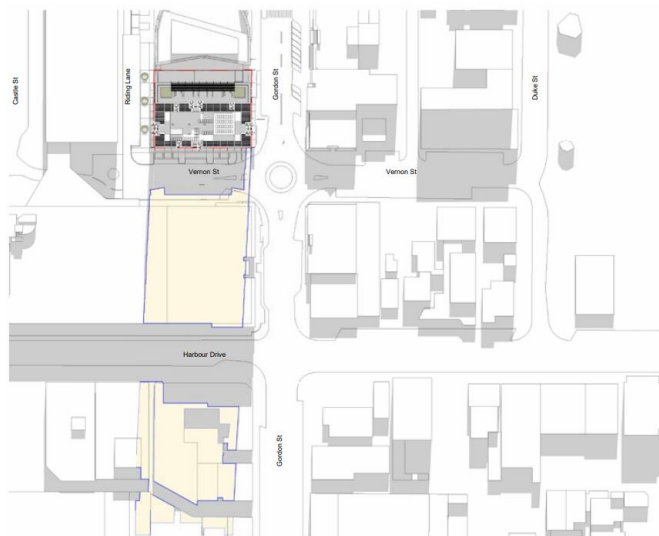
The Report is accompanied by shadow diagrams prepared by Cortese which are included at **Appendix A**. These diagrams, alongside the further analysis provided within the Design Report at **Appendix B**, illustrate overshadowing impacts at hourly intervals between 9:00 am and 3:00 pm on the winter solstice, representing the worst-case scenario for solar access throughout the year. The winter solstice diagrams are provided at **Figure 31** below. The analysis demonstrates that the proposed development will primarily cast shadows over non-residential uses to the south and southeast, while City Square remains unaffected during the protected hours of 12:00 pm to 2:00 pm, consistent with Part 7.20 of the CLEP 2013.

Notwithstanding some overshadowing outside these hours, the winter solstice analysis clearly demonstrates that the proposal is acceptable from an overshadowing perspective, as:

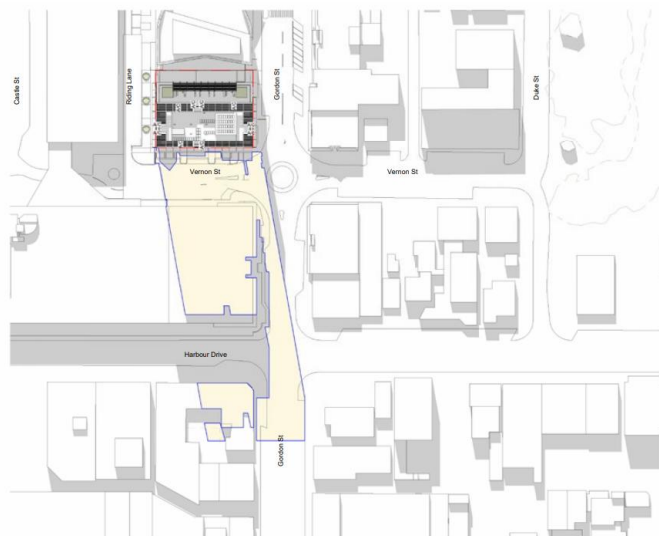
- The tower height has been restricted to 90m, reducing shadow impacts on sensitive land uses and maintaining solar access to key public spaces.
- City Square retains full solar access between 12:00 pm and 2:00 pm, ensuring compliance with Part 7.20 of the CLEP 2013 and preserving solar amenity for community use along Harbour Drive.

- Shadows are predominantly cast on non-sensitive land uses, including commercial and retail sites, rather than residential or heritage-sensitive items.
- No additional overshadowing is generated on the protected sections of Harbour Drive beyond that already cast by Coffs Central.

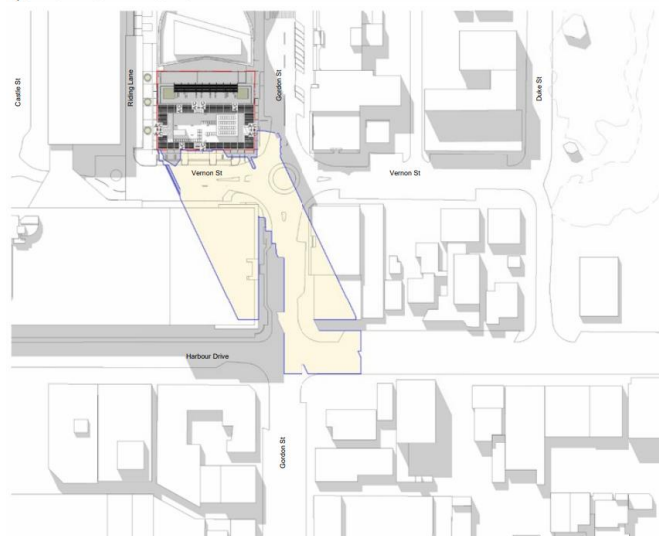
Given the Site's context within the Coffs Harbour City Centre and the absence of additional overshadowing to residential uses, public places, and open space, the proposed development is considered appropriate from an overshadowing perspective.



1 | SHADOW DIAGRAM - 21 JUNE 9AM



2 | SHADOW DIAGRAM - 21 JUNE 10AM



3 | SHADOW DIAGRAM - 21 JUNE 11AM



4 | SHADOW DIAGRAM - 21 JUNE 12PM



5 | SHADOW DIAGRAM - 21 JUNE 1PM



6 | SHADOW DIAGRAM - 21 JUNE 2PM

Key

- Shadow of Proposed Building
- No Additional Overshadowing (12:00-14:00)

Figure 31 *Winter solstice shadow diagrams*

Source: Cortese

8.4 Residential Amenity

The proposed development seeks to provide a high standard of amenity within each of the dwellings, consistent with the proposal's vision to deliver a high-quality, contemporary mixed use development that embodies quality residential dwellings. Importantly, the proposal has been designed with consideration of the relevant provisions of the Apartment Design Guide (ADG) as per Schedule 9 of the Housing SEPP. The proposed development has been designed to accommodate appropriate residential amenity for occupants of the future development as demonstrated by the Architectural Drawings (**Appendix A**). Refer to the Design Report at **Appendix B** which contains the detailed ADG and Housing SEPP assessment of the scheme.

8.5 Flooding

A Flood Assessment has been prepared by Adams Consulting Engineers and is provided at **Appendix L**. The assessment includes a review of existing flood behaviour, assessment of post-development conditions, and identifies any potential impacts and mitigation measures to allow for appropriate mitigation of any identified impacts.

In summary, the updated Flood Assessment concludes that the proposal results in an acceptable and compliant flooding response, noting:

- The site is located within a Flood Planning Area overlay, but is not inundated during the 1% AEP, with flooding generally confined to adjacent kerbs and road reserves along Gordon Street, Vernon Street, and the southern end of Riding Lane. The site itself is not inundated in a 1% AEP event.
- No basement car parking is proposed, and access to lower-level plant is protected by an internal stair apex set above the adopted FPL of RL 4.30 m AHD, preventing flood ingress.
- All residential and car parking levels are located well above the Probable Maximum Flood (PMF) level of 5.90m AHD, eliminating flood risk to sensitive uses.
- Ground floor uses comprise retail and multipurpose spaces, which are considered low-risk and unlikely to be in use during major flood events. These areas will incorporate flood-compatible building specifications, including durable materials, integrated drainage and a minimum freeboard of 350 mm.
- Egress pathways have been designed to connect to northern footpaths outside the 1% AEP flood extent, ensuring safe evacuation during extreme events.

Overall, the Flood Assessment confirms that the proposal does not adversely alter existing flood behaviour or impact adjoining properties, incorporates proportionate mitigation measures, maintains safe access and egress during flood events, and achieves an appropriate balance between public-domain integration, accessibility and resilient flood design.

Further detail in this regard is provided in the FIA at **Appendix L**.

8.6 Landscaping and Arboriculture

The landscape design, prepared by EBLA Studio, is detailed in the Landscape Design Report provided at **Appendix E**. The scheme adopts a climate-responsive and culturally informed approach, delivering varied experiences across the ground plane, podium terrace, and roof-level communal spaces.

8.6.1 Tree Removal

A Preliminary Arboricultural Impact Assessment has been undertaken by Harbour Arbor and provided at **Appendix H**. The existing vegetation on the site comprises six surveyed trees (T1–T6) and two additional unsurveyed species (refer to the Landscape Plans at **Appendix AA**), all of which are proposed for removal to facilitate essential public domain upgrades, including kerb and gutter realignment, improved pedestrian access, and installation of deep soil zones for long-term canopy planting (**Figure 32**). While opportunities for retention were considered, arboricultural constraints and proximity to civil works make preservation unfeasible.



Figure 32 Identified Tree Removal Strategy

Source: Cortese

The removal includes species such as *Spathodea campanulata* (African Tulip), *Roystonea regia* (Royal Palms), *Stenocarpus sinuatus* (Firewheel Tree), *Archontophoenix cunninghamiana* (Bangalow Palms), *Plumeria acutifolia* (Frangipani), and *Cupressus sempervirens* (Golden Pencil Pine), some of which meet the CHLEP 2013 and CHDCP 2013 criteria for 'prescribed vegetation'.

The preliminary arboricultural report identifies the trees to be in good condition, however their removal is necessary to facilitate the development. To offset the removal, the redevelopment will implement a replacement strategy, planting large-canopy native species in enhanced soil conditions at an increased ratio, guided by Connecting with Country principles detailed in **Section 3.4**.

8.6.2 Landscaping Strategy

The ground plane landscape is designed as an extension of the public domain, creating a cohesive, accessible, and climate-responsive streetscape that aligns with the *Coffs Harbour Public Realm Guidelines*. The design replaces three existing street trees with large canopy natives, including *Toona ciliata* (Red Cedar) and *Grevillea robusta* (Silky Oak). These trees are complemented by native understorey planting and permeable paved surfaces that improve stormwater management (**Figure 33**).

Street character has been reinforced through species selection and spatial arrangement. Gordon Street adopts upright canopy trees to maintain sightlines and complement the avenue identity, while Vernon Street introduces layered planting to buffer pedestrians from traffic and improve thermal comfort. Riding Lane includes adaptable lawn breakout spaces positioned adjacent to internal uses, offering flexible areas for informal gathering.



Figure 33 *Ground Plane Landscaping*

Source: Cortese

The commercial podium terrace at Level 6 has been designed to reflect a subtropical outdoor environment that extends the building's internal functions into a landscaped setting. The design introduces a series of raised planters with sufficient depth and soil volume to accommodate small trees, creating a strong visual connection of greenery when viewed from the public domain. These planters are complemented by cascading groundcovers and spreading shrubs that soften the building edge and deliver vertical greening down the façade.

Planting is tailored to microclimatic conditions, using species selected for drought tolerance and coastal resilience to ensure longevity and low maintenance (**Figure 34**).



Figure 34 *Podium Landscaping*

Source: Cortese

The rooftop garden offers a landscape designed for comfort, resilience, and community connection. A multi-layered mix of native and coastal species enhances thermal performance and urban cooling, while edible and aromatic plants promote sensory engagement and wellbeing. Modular raised planters will define spaces, provide wind buffering, and create visual screening, complemented by integrated seating for informal gatherings. Planting is predominantly endemic and indigenous, selected for low maintenance, biodiversity, and durability under rooftop conditions (**Figure 35**).



Figure 35 *Rooftop Landscaping*

Source: Cortese

8.7 Traffic and Transport

A Traffic and Parking Assessment has been prepared by TTPA and is provided at **Appendix M**. This report provides an assessment of the traffic generation, vehicular access, parking arrangements, construction traffic management, and the Green Travel Plan associated with the proposed development. A summary of the assessment is provided below.

8.7.1 Traffic Generation

A detailed traffic generation assessment has been undertaken in accordance with *The Guide to Transport Impact Assessment* (2024). The resulting traffic volumes are summarised in **Table 23**.

Table 23 Peak Traffic Generation

Type of Use	GTTIA Traffic Generation rate	Resulting Traffic Generation
High-Density Residential (low transport accessibility)		
AM Peak	0.39U – 3.06	55
PM Peak	0.17B or 0.475U-6.66	64
Retail		
AM Peak	1.55 - 1.78 per 100m2 GLFA	7
PM Peak	3.30 – 3.71 per 100m2 GLFA	13
Office		
AM Peak	0.99/100m2 GFA	8
PM Peak	0.96/100m2 GFA	8
Total		
AM Peak	-	70
PM Peak	-	85

These additional traffic movements have been modelled using SIDRA for the post-development scenario, as detailed in **Table 24**. The analysis undertaken by TTPA confirms that all the intersections have satisfactory levels of service and that the relatively minor peak traffic movements generated by the development can be accommodated within the road network without noticeable impacts.

While the upgrade of the existing church facilities may generate some additional visitation, the inclusion of a residential component will accommodate a substantial proportion of these attendees on-site. The surrounding intersections will continue to perform at a satisfactory level.

Table 24 SIDRA modelling

Post Development Performance	AM		PM	
	LOS	AVD	LOS	AVD
Pacific Highway/Harbour Drive	C	29.2	C	33.1
Pacific Highway/Coffs	C	33.9	D	42.7
Pacific Highway/Park Avenue	C	42.4	D	48.2
Harbour Drive/Gordon Street	C	29.1	B	27.3
Gordon Street/Vernon Street	A	4.0	A	3.8

8.7.2 Access

Vehicle access to the site will remain via Gordon Street, providing appropriate sight distances and complying with AS 2890.1, 2890.2, and 2890.6. The design accommodates all vehicles requiring access, as confirmed in the **Appendix M** turning path assessment, with internal circulation offering adequate manoeuvring space. Servicing will be managed through a mix of on-street council collection for residential uses and private collection for commercial, retail, and church components.

8.7.3 Parking

8.7.3.1 Car Parking

As detailed in **Table 25**, the proposed development adopts a parking strategy that balances on-site provision with contemporary transport planning principles and the detailed demand analysis undertaken by TTPA (**Appendix M**). The proposal includes six dedicated car-share spaces, with TTPA confirming that each car-share space can offset multiple private vehicles. This significantly reduces residential parking demand and supports mode-shift objectives for the City Centre.

In addition, the parking demand generated by the retail, office and church components is efficiently managed through shared-use arrangements. TTPA's assessment identifies that peak parking periods for these uses occur at different times of day, allowing the 33 mixed-use spaces to operate effectively across user groups without cumulative demand. This shared-use approach is appropriate for a CBD environment and is supported by the site's proximity to the Castle Street multi-storey car park, which provides convenient overflow capacity during occasional peak periods.

Table 25 Minimum car parking requirements

Use	CHDCP 2013	Housing SEPP	Proposed
Individual Residential Parking	198 spaces	160 spaces	134 spaces
Car Share Residential Parking	-	-	6 Spaces
Shared Retail, Office & Church Parking	39 spaces	39 spaces	33 spaces
Total	237 spaces	199 spaces	173 spaces

8.7.3.2 Bicycle and Motorcycle parking

TTPA has also confirmed that the proposed bicycle and motorcycle parking provision is appropriate for the scale and mixed-use nature of the development. The proposal provides 23 bicycle spaces and 5 motorcycle spaces, exceeding the Austroads guidance and supporting the site's Green Travel Plan and broader mode-shift objectives.

8.7.4 Construction Traffic Management

A Construction Traffic Management Plan (CTMP) has been prepared by TTPA, which addresses the relevant requirements relating to construction traffic management (refer to **Appendix M**). The relevant assessment is included in the following subsections.

Construction vehicle routes and access management

Truck movements associated with excavation will enter and exit the site via the north-eastern driveway off Gordon Street. All construction vehicles will utilise the classified State and regional road network for access. Concurrent truck arrivals and departures are not anticipated, given the scale of works. However, to ensure traffic safety and minimise disruption, no queuing or marshalling of trucks will occur on public roads. A contractor-managed call-up procedure will be implemented to coordinate vehicle arrivals as required.

Construction staff parking

On-site and on-street parking for construction workers will be limited until parking levels are complete. To manage this constraint, workers will be advised of designated tool and equipment drop-off points and secure storage within site sheds and amenities. Workers will be encouraged to utilise the public transport options available in the vicinity of the site.

Heavy vehicle traffic generation

The construction and fit out phase is expected to span approximately 29 months, with peak activity involving up to 120 personnel on-site. While site activity will be more intensive during this period, heavy vehicle movements will average four to five truck visits per day. Truck access will primarily involve 20 m concrete agitators and semi-trailers required for structural elements. All loading and unloading will occur within the designated works zone, and pedestrians passing the site will be protected by A-Class fencing and appropriate traffic management controls.

Mitigation and management of impacts on existing traffic and pedestrian networks

Pedestrians walking along the site frontage will be protected by temporary construction fencing. TfNSW-accredited traffic controller shall always supervise all vehicle movements into and out of the Works Zone and materials movements to and from the site, ensuring pedestrians have the right of way at all times.

The proposed works will not impede emergency vehicle access to the site or adjoining properties. Emergency protocols require the presence of a traffic controller to facilitate emergency access when necessary. In such circumstances, all truck movements will be suspended, and vehicles cleared from the access point.

8.7.5 Green Travel Plan

A Green Travel Plan (GTP) has been prepared for the proposed development and is included within the Traffic and Parking Assessment by TTPA provided at **Appendix M**. When implemented, the GTP will seek to reduce the need to travel and promote sustainable means of transport. The more specific objectives include:

- Reducing the proportion of single-occupant car travel by residents and visitors to and from the site.
- Increasing the mode share of public transport, walking and cycling (active transport).
- Where a private vehicle is to be used, encourage more efficient use. Such smarter travel use can include not travelling by single-occupancy cars in peak hours and not using cars for short-distance trips when alternative public transport is available.

Further detail regarding the Green Travel Plan is provided at **Appendix M**.

8.8 Water Management

8.8.1 Stormwater Management

A Stormwater Management and WSUD Strategy has been prepared by IGS Consultants and is provided at **Appendix BB**. The proposal includes a 9.0 m² filtration chamber housing five 690 (Tall) NSORB Stormfilter units, integrated within the on-site detention (OSD) system prior to discharge into Council's existing in-ground drainage network. The adopted approach ensures stormwater quality and quantity objectives are met in accordance with Coffs Harbour City Council requirements and NorBE Guidelines. Key elements of the strategy include:

- OSD to limit post-development discharge to pre-development rates for all events up to 1% AEP.
- Water quality treatment devices, including the Stormfilter chamber, to achieve pollutant reduction targets.
- Connection to existing infrastructure, utilising water mains and stormwater facilities in Gordon Street and the sewer network in Riding Lane, subject to detailed survey and verification of asset locations and levels.
- Groundwater management, with any encountered groundwater during basement works treated and discharged via the OSD system to maintain quality and quantity standards.

8.8.2 Water Quality

MUSIC Modelling shows that the proposed treatment train ensures that the removal of the relevant pollutants complies with all of the relevant criteria. This can be seen below in Table 24.

Table 26 MUSIC model results

Pollutant	Minimum required reduction (%)	Modelled reduction (%)	Compliant
Gross Pollutants (size>5mm)	90%	100%	Yes
Total Suspended Solids (TSS)	80%	80.3%	Yes
Total Phosphorus (TP)	60%	68.2%	Yes
Total Nitrogen (TN)	45%	63.2%	Yes

8.9 Noise and Vibration

This EIS is accompanied by a Noise and Vibration Impact Assessment prepared by PKA Acoustic Consulting (PKA) (**Appendix CC**). The assessment was undertaken in accordance with the NSW Environment Protection Authority (EPA) *Noise Policy for Industry* (2017), the *Interim Construction Noise Guideline* (DECC 2009), the *Developments Near Rail Corridors and Busy Roads – Interim Guideline*, and the acoustic provisions of the National Construction Code. The report assesses potential operational and construction noise and vibration impacts associated with the proposed mixed-use development, including traffic noise intrusion, church activities, mechanical plant, car park operation and construction works. PKA concludes that the proposal will result in an acceptable acoustic outcome.

8.9.1 Existing Environment

Unattended noise monitoring was undertaken between 5 and 14 February 2025 to establish baseline traffic and ambient noise levels at the site, predominantly influenced by vehicle movements along Vernon Street and Gordon Street. These measurements informed the Rating Background Levels (RBLs) and project noise trigger levels adopted in the assessment.

The surrounding environment is characterised by existing commercial premises on all boundaries, with no current external residential sensitive receivers. The primary sensitive receivers are therefore the future residential apartments within the proposed tower, located above multiple podium and car-parking levels.

The measured RBLs for the site are:

- Daytime: 56 dB(A)
- Evening: 47 dB(A)
- Night: 47 dB(A)

These values reflect the urban commercial context in which the development is situated.

8.9.2 Road Traffic Noise

A traffic noise intrusion assessment was undertaken for façades facing Vernon Street and Gordon Street to determine required acoustic treatments.

Measured façade-incident traffic noise levels were:

- Vernon Street: 62 dB(A) day / 64 dB(A) night
- Gordon Street: 57 dB(A) day / 58 dB(A) night

These levels informed the recommended façade and glazing specifications needed to achieve internal noise criteria as detailed in the Architectural Drawings (**Appendix A**).

8.9.3 Operational Noise

Church and Ground Floor Uses

Noise generated from the ground-floor church was modelled using a conservative scenario of amplified music and raised-voice congregation of up to 250 patrons. The main worship space is located internally and is separated from the nearest receivers (the future apartments above) by multiple reinforced concrete slabs. Predicted noise levels at residential receivers are less than 35 dB(A), well below applicable project noise trigger levels. No specific acoustic mitigation is therefore required beyond standard construction and fit-out.

Car Parking

Traffic generation associated with the residential, retail, office and church components was modelled based on peak-hour activity. The assessment finds that:

- Noise from car-park movements and access is consistent with typical mixed-use developments.
- Peak 15-minute traffic volumes (approximately five vehicles per 15 minutes for non-residential uses) are negligible in the context of surrounding street activity.
- No additional mitigation is required for car-park operations.

Mechanical Noise Breakout

Mechanical plant selections are not finalised at this stage. PKA notes that detailed plant schedules will be prepared prior to Construction Certificate, at which time acoustic criteria can be confirmed and any required attenuation incorporated into equipment selection and placement.

8.9.4 Construction Noise and Vibration

The construction assessment considers typical demolition, excavation and building activities. Predicted construction noise levels at the nearest receivers (future on-site residences and adjacent commercial properties) range between:

- up to 80 dB(A) during demolition and excavation, and
- approximately 66–78 dB(A) during internal and external building works.

While some activities exceed EPA noise-affected levels, such exceedances are typical for a project of this scale and duration. These impacts can be effectively managed through reasonable mitigation measures, including construction sequencing, use of quieter equipment where practicable, and implementation of a Construction Noise and Vibration Management Plan.

8.10 Contributions and Public Benefit

8.10.1 Contributions

8.10.1.1 Section 7.11 Development Contributions Plan 2020

The proposed development does not propose any alternative public benefits or a departure from an existing contributions framework. Contributions will be provided in accordance with Section 7.11 Contributions set out in the City of Coffs Harbour Development Contributions Plan 2025, which involves varying contributions for different types of dwellings and parking.

8.10.1.2 Current Water & Sewer Contributions

Contributions will be provided in accordance with current water & sewer contributions set out in the City of Coffs Harbour Water & Sewer Contributions Plan 2025, which involves varying contributions for water supply, sewerage and stormwater infrastructure.

8.10.2 Public Benefit

The proposal represents a public benefit, given that it includes the following:

- The proposal will deliver up to 152 new dwellings, including 40 affordable homes, making a meaningful contribution to addressing Coffs Harbour's housing shortfall. This responds directly to Council's forecast need for approximately 12,800 new dwellings by 2041 and aligns with State objectives under the National Housing Accord and Housing Delivery Authority to accelerate housing supply in well-served locations.
- The provision of affordable housing will support access to housing for essential workers such as nurses, police, teachers, firefighters and paramedics, helping retain a stable workforce.
- By concentrating development within the Coffs Harbour City Centre, the proposal optimises access to existing infrastructure, services and transport, reduces pressure for greenfield expansion, and supports compact city and urban consolidation principles advocated by Council's more recent strategic framework.
- The development incorporates active ground-floor retail and commercial uses that enhance street activation along Gordon Street, Vernon Street and Riding Lane, reinforce the City Centre's economic role, and support local employment both during construction and ongoing operation.
- The built form demonstrates strong urban design principles, including a slender, articulated tower form, generous setbacks to sensitive interfaces such as Yarilla Place, and appropriate consideration of solar access, daylight penetration, wind comfort, and residential amenity.
- The proposed height and form are justified by site-specific constraints, including acid sulfate soils and a high water table, which necessitate above-ground parking solutions. This approach avoids significant environmental impacts while supporting feasible and efficient housing delivery in a central CBD location.

- The development creates public benefits through the provision of new community faith-based facilities, including place of worship, Wesley Hall Soup Kitchen, and Kids Ministry plus multipurpose spaces available for public/community use to support social and community needs.
- The proposal will deliver a catalyst project that encourages further investment in Coffs Harbour and contributes to its evolution as a vibrant, mixed-use regional city centre.

8.11 Other Impacts

An assessment of the other impacts of the development have been undertaken by the relevant specialist consultants and are appended to this Report as set out in **Table 27** below.

Table 27 Summary of other technical assessments

Consideration	Consultant	Summary	Reference
Aboriginal Cultural Heritage	Everick Heritage	An Aboriginal Heritage Due Diligence Assessment was undertaken by Everick Heritage in accordance with the <i>NSW Due Diligence Code of Practice</i> (2010) to determine the presence of Aboriginal objects and potential impacts from the proposed development. The assessment identified nine AHIMS sites within the broader landscape, the closest being approximately 400 metres northeast of the site, none of which are anticipated to be affected by the proposed development. The site is highly disturbed from previous development, meeting the definition of 'disturbed land' as per Everick Heritage and overall archaeological potential is considered low. The Coffs Harbour and District Local Aboriginal Land Council confirmed harm is unlikely, recommending only an inspection beneath the existing church following its removal. With these measures in place, the project is not expected to impact Aboriginal cultural heritage values.	Appendix DD
Wind	CPP Wind Engineering Consultants	A Pedestrian Wind Assessment has been prepared and demonstrates that the wind environment is generally suitable for pedestrian walking and standing, with no widespread adverse impacts on comfort or amenity. Areas intended for prolonged stationary use may require localised treatment to improve comfort. Wind conditions on the podium terrace and most residential balconies are expected to be mild, with higher exposure on corner balconies and the roof terrace. A single location at the tower corner (Vernon Street/Riding Lane) experiences elevated wind speeds due to downwash and corner acceleration, exceeding safety criteria on an infrequent basis. The originally proposed awning infill has been tested and does not provide a meaningful reduction in wind speeds at this location. Targeted mitigation is therefore required. The preferred mitigation is the installation of approximately 2 m high vertical screens near the tower corner, oriented parallel to Vernon Street (or angled), to interrupt corner wind acceleration. Landscaping may be included as a supplementary measure only. No additional awning extension is required along Riding Lane, and acceptable wind conditions can be achieved with the above targeted intervention.	Appendix EE
Contamination	Regional Geotechnical Solutions	A Stage 1 and Stage 2 Site Contamination Assessment has been completed, including desktop review, site investigations, and laboratory analysis of soil samples. The assessment found the site generally suitable for the proposed redevelopment, subject to implementation of recommended management measures. Minor contamination was identified, including a localised Aldrin/Dieldrin hotspot and trace asbestos in one sample, both within manageable limits under NEPM 2013 guidelines. Recommendations include a hazardous materials survey prior to demolition, further sampling post-demolition, and appropriate remediation if required. With these measures in place, the site can be safely developed.	Appendix I

Geotechnical	Regional Geotechnical Solutions	A Geotechnical Assessment by Regional Geotechnical Solutions identified a subsurface profile of minor clay fill over alluvial soils, transitioning to residual soils and weathered metasilstone at depth. Laboratory testing confirmed that net acidity in all samples exceeds action criteria, requiring an Acid Sulfate Soils Management Plan (provided at Appendix G) with treatment measures. Conversely, salinity testing indicates an Electrical Conductivity of 0.044 dS/m, classifying the soils as non-saline and confirming that a Soil Salinity Management Plan is not required. The report also provides recommendations for excavation, footing design, durability requirements, and earthquake design parameters, ensuring the development addresses geotechnical risks. Furthermore, a subsequent Ground Water Impact Assessment found that during construction some minor and temporary dewatering may be required. The volumes are expected to be low and are anticipated to be less than about 1,000 litres per day. This is not expected to cause any lowering of the groundwater level.	Appendix P & Appendix LL
Acid Sulfate Soil	Regional Geotechnical Solutions	An Acid Sulfate Soil Management Plan has been prepared in accordance with investigations undertaken in 2025, building on earlier assessments and laboratory testing from 2023. The plan outlines procedures for managing and treating acid sulfate soils (ASS) that will be disturbed during construction, including treatment methods, liming rates, validation requirements, and roles and responsibilities for implementation. Pre-construction measures focus on minimising ASS disturbance through design modifications and reserving treatment areas, while construction-phase protocols ensure personnel are trained to identify ASS indicators, follow site-specific treatment processes, and respond to unexpected events.	Appendix G
Aviation Safeguarding Assessment	Avlaw Aviation Consulting	The Aviation Safeguarding Assessment, prepared in accordance with the <i>National Airports Safeguarding Framework</i> and relevant aviation regulations, evaluates the proposed redevelopment. The project involves demolition of existing structures and construction of a 25-storey tower reaching 94.200 m AHD, with temporary hammerhead tower cranes extending to approximately 104.200 m AHD during construction. The assessment confirms that while the building and cranes will intrude into the Inner Horizontal Surface of Coffs Harbour Airport's Obstacle Limitation Surfaces (OLS) by 46.67 m, they will not penetrate PANS-OPS surfaces associated with instrument flight procedures. Mitigation measures, including obstacle lighting, markings, and NOTAM notifications, will ensure safety and operational integrity. The structure will be reported to the Department of Defence for inclusion in the national obstacle database, though no approval is required. Avlaw concludes that the proposal will not adversely impact the safety, efficiency, or regularity of aircraft operations and is suitable for approval.	Appendix T
BASIX	Jensen Hughes	An assessment of the proposed development's consistency with the relevant provisions and controls under BASIX and NatHERS has also been prepared. This concludes that the development comfortably satisfies all applicable BASIX water, energy and thermal comfort requirements, achieving a Water score of 41%, an Energy score of 64% and an average NatHERS rating of 8.2 stars.	Appendix GG and Appendix K
Biodiversity	BDAR Waiver issued by the Department	The site does not contain any significant vegetation. Accordingly, the proposal will not cause any significant impacts on biodiversity or the natural environment as recognised by the Department's Environment Heritage Group in granting a waiver for the preparation of a BDAR on 5 November 2025.	Appendix O
Sustainability	Jensen Hughes	An ESD Report and Section J report prepared by Jensen Hughes confirms that the proposed mixed-use development meets all General Sustainability Provisions under the Sustainable Buildings SEPP. Key initiatives include high-performance façades with integrated shading to optimise passive thermal performance, strategies to maximise daylight	Appendix J and II

		and views, and all-electric HVAC systems featuring efficient air distribution and heat pumps. Guided by the Green Star framework, these measures collectively deliver best-practice outcomes in energy efficiency, indoor environmental quality, water conservation, and material selection, ensuring long-term environmental resilience and operational performance.	
Operational Waste	Elephants Foot Consulting	An Operational Waste Management Plan prepared by Elephants Foot Consulting establishes efficient and compliant waste arrangements for the proposed mixed-use development, with separate systems for residential and non-residential uses. For residential, Council will service 9×1100 L general waste (2× weekly), 9×1100 L recycling (2× weekly) and 16×240 L FOGO (1× weekly). Non-residential waste will be privately serviced on separate days from residential, with 2×1100 L general waste (2× weekly) and 2×1100 L recycling (2× weekly) stored in a dedicated bin room. All collections use a safe, at-grade collect-and-return arrangement from Gordon Street, with the building manager ferrying/arranging bins and keeping the loading frontage clear.	Appendix Q
Construction and Demolition Waste	Elephants Foot Consulting	A Construction and Demolition Waste prepared by Elephants Foot Consulting establishes efficient and compliant waste arrangements for the construction of the proposed mixed-use development.	Appendix HH
Vertical Transport	Integrated Group Services	Integrated Group Services has prepared a Vertical Transport Analysis confirming that the proposed mixed-use development will achieve optimal lift configuration for efficiency and service quality. Based on 148 apartments, four lifts are proposed in line with NSW ADG guidelines of one lift per 40 dwellings, with three lifts dedicated to residential use and a fourth primarily serving commercial spaces while supplementing residential demand outside business hours. Lift performance has been assessed using CIBSE Guide D criteria to ensure acceptable passenger waiting times and a high standard of vertical transportation for a development of this scale.	Appendix R

9.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specifies that such a justification must be made having regard to biophysical, economic and social considerations and the principles of ecologically sustainable development. This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

This section provides a comprehensive evaluation of the proposal's biophysical, social, and economic impacts and alignment with the objects of the EP&A Act and other applicable statutory instruments. The Section concludes that the proposal is justified by considering the justification of the proposed development and in reference to Section 4.15 of the EP&A Act, which specifies matters for consideration a consent authority must consider in determining a development application. As such, the following matters have been considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the proposed development while still achieving the objectives of the project;
- Consistency with the strategic context;
- Consistency with the statutory requirements;
- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality;
- The suitability of the site for the development; and
- The public interest.

9.1 Consistency with the Strategic Context

Sections 5.1.2 and 5.2 of this Report demonstrate that the proposed development and concurrent CHLEP 2013 amendments exhibit strong strategic merit and contribute to the delivery of the many strategic aims stipulated for the site in its local and regional context. **Section 5.1.2** demonstrates that the project is consistent with the relevant strategic framework, including (but not limited to) the *North Coast Regional Plan 2041*, *Coffs Harbour Regional City Action Plan 2036*, *Coffs Harbour Local Strategic Planning Statement 2020*, *Coffs Harbour Local Growth Management Strategy 2020* and *Coffs Harbour Affordable Housing Strategy 2024*.

The proposed development supports key strategic planning moves relating to the following themes:

- Delivering housing supply, affordability and diversity through the provision of 152 dwellings, including 40 affordable apartments, on a highly accessible CBD site, consistent with Council housing targets and State objectives under the Housing Delivery Authority and National Housing Accord.
- Reinforcing the role of the City Centre via a high-quality mixed-use development that integrates residential, commercial and retail uses and supports employment, activity and urban consolidation within the CBD.
- Providing tangible community benefit through the retention and upgrade of faith-based and community facilities, including the place of worship, Wesley Hall Soup Kitchen, Kids Ministry and multipurpose community spaces.
- Acting as a catalyst project that encourages further investment and supports the continued evolution of Coffs Harbour as a compact, vibrant and mixed-use regional city centre.

9.2 Consistency with the Statutory Requirements

Section 6.0 of this Report demonstrates that the proposed development is consistent with the relevant statutory planning framework, including the Planning Systems SEPP, CHLEP 2013, and other applicable legislation. **Appendix N** demonstrates that this Report has addressed all relevant matters as specified in the SSD-91539707 SEARs and Sections 190-192 of the EP&A Regulation

The proposed development is SSD by virtue of the Ministerial planning order. The site was declared to be SSD as part of the HDA pathway, specifically pursuant to State Significant Declaration Order (No 4) 2025 (Order) issued on 1 April 2025,

which specifies development in EOI application 235921 dated 3 February 2025, including development purposes of a shop-top housing with the provision of affordable housing at 19A-21 Gordon Street, Coffs Harbour.

Section 6.2 demonstrates that the proposed development is permissible with consent. Use of the site for place of public worship, residential flat building and commercial premises is explicitly permitted under the E2 Commercial Centre zoning of the site.

The proposal does not trigger the need for an EPBC Act approval and is consistent with the principal planning controls of the CHLEP 2013, as demonstrated in **Section 6.2**. The proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact. Specifically, the proposal is consistent with the Objects of the EP&A Act as:

- It will enable the delivery of 152 dwellings including 40 affordable housing dwellings to support the growing population of Coffs Harbour LGA and more broadly North Coast Region, and will positively contribute to housing supply and affordability.
- It allows for additional employment opportunities throughout both the construction and operational phases.
- It will facilitate the principles of ESD through a range of design and operation initiatives.
- It facilitates the orderly and economic use and development of land.
- It facilitates good design and amenity of the built environment.
- It promotes the proper construction and maintenance of buildings.

9.2.1 Consistency with the Objects of the Act

The proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact, as detailed in **Table 28** below.

Table 28 Consistency with the Objects of the Act

Object of the Act	Proposal's Response
<i>(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i>	The proposal promotes the social and economic welfare of the community by delivering a well-designed mixed-use development that provides new housing, employment-generating floor space, and upgraded community and faith-based facilities within a highly accessible urban centre.
<i>(b) to promote the supply, delivery and maintenance of housing, including affordable housing,</i>	The proposal directly supports the supply and ongoing delivery of housing by providing a substantial number of new dwellings within an established urban centre, together with a dedicated affordable housing component. The inclusion of affordable housing is consistent with relevant housing policies and SEPP provisions and contributes to improved housing diversity and accessibility within the locality.
<i>(c) to promote productivity through the development and management of the State and its resources,</i>	The development leverages existing infrastructure, consolidates growth within an appropriate centre-based location, and contributes to a more productive urban environment through the co-location of residential, commercial and community uses.
<i>(d) to protect the environment, including the conservation of threatened species of native animals and plants and ecological communities and their habitats,</i>	The proposal appropriately protects environmental values through the integration of new landscape planting. The development will not impact any threatened species, ecological communities or critical habitat.
<i>(e) to promote resilience to climate change and natural disasters through adaptation, mitigation, preparedness and prevention,</i>	The proposal promotes resilience to climate change and natural hazards by incorporating design measures that enhance environmental performance, reduce emissions and support long-term adaptability. Compliance with BASIX and NatHERS requirements ensures improved thermal efficiency, reduced water and energy consumption.
<i>(f) to promote the sustainable management of built and cultural heritage, including Aboriginal cultural heritage,</i>	The proposal promotes the sustainable management of built and cultural heritage by respecting the local character of the area and embedding opportunities for cultural expression within the development. Engagement with Aboriginal stakeholders has informed the design intent, with opportunities for interpretive elements and public art incorporated to acknowledge and celebrate the cultural significance of place.

<i>(g) to promote good design, amenity and the proper construction and maintenance of built environments, including the protection of the health and safety of the occupants of buildings,</i>	The proposal demonstrates a high standard of design quality through a contemporary built form that responds sensitively to its surrounding context and enhances local amenity. The development incorporates well-considered architectural articulation, generous landscaping, and upgraded public domain elements that contribute to a safe, attractive and human-scaled environment.
<i>(h) to provide opportunities for participation in environmental planning and assessment,</i>	Early engagement undertaken prior to lodgement has informed the design response and ensured that local perspectives are appropriately reflected in the development.
<i>(i) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	The development incorporates water- and energy-efficient fixtures, high-performance glazing and insulation, and improved thermal comfort outcomes in accordance with BASIX and NatHERS commitments, reducing operational resource consumption and environmental impact.
<i>(j) to promote a proportionate and risk-based approach to environmental planning and assessment,</i>	The proposal adopts a proportionate and risk-based approach to environmental planning and assessment by relying on targeted technical investigations that correspond to the scale, setting and environmental sensitivities of the site. This EIS and its assessment ensure that potential impacts have been identified, understood and appropriately managed.
<i>(k) to promote the orderly and economic use and development of land.</i>	The proposal promotes the orderly and economic use of land by facilitating a consolidated redevelopment outcome within the Coffs Harbour City Centre, making efficient use of existing infrastructure, services and public transport. The mixed-use design supports a compact urban form, directs growth to an appropriate centre-based location, and aligns with relevant strategic planning frameworks that encourage infill development in well-served areas.

9.2.2 Principles of Ecologically Sustainable Development

Section 193 of the EP&A Regulation outlines four (4) principles of ecologically sustainable development to be considered in assessing a project. **Table 29** below provides an assessment of the proposal's impact against these principles. The assessment is informed by the ESD Report prepared by Jensen Hughes at **Appendix J**.

Table 29 Assessment against the Principles of Ecologically Sustainable Development

Principle	Assessment
Precautionary Principle If there is a threat of serious irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.	This Report and its supporting reports and studies has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the proposal.
Intergenerational Equity The present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.	The proposal has been designed to benefit both the existing and future generations by: • Delivering public domain upgrades that improve walkability, social connection, and urban amenity over the long term. • Incorporating sustainable features such as rooftop open space, energy-efficient systems, and native landscaping to support environmental resilience and reduce future resource demands. • Providing a diverse mix of housing, including market and affordable apartments of varying sizes to meet the evolving needs of current and future communities. • Creating tangible public benefits by upgrading community faith-based facilities, including the place of worship, Wesley Hall Soup Kitchen, and Kids Ministry multipurpose spaces, supporting social and community needs. • The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this Report and the appended technical reports.

Conservation of biological diversity and ecological integrity Maintaining the diversity and quality of ecosystems and enhancing their capacity to adapt to change and provide for the needs of future generations.	The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area.
Improved valuation, pricing and incentive mechanisms Environmental factors should be included in the valuation of assets and services.	The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

9.3 Likely Impacts of Development

9.3.1.1 Social and Economic

The proposal's social and economic impacts include:

- Provision of diverse housing and land uses through the delivery of new dwellings alongside complementary commercial and specialty retail uses in a highly accessible City Centre location, close to public transport, services and amenities.
- Addressing housing supply and affordability pressures by enabling the delivery of much-needed housing, including affordable housing, contributing to NSW housing targets and responding to the recognised shortage within the Coffs Harbour LGA.
- Employment generation and economic activity through the creation of direct and indirect jobs during construction and ongoing employment opportunities associated with the operation of retail and commercial uses.
- Delivery of community and social infrastructure benefits through new and upgraded faith-based and community facilities, providing accessible spaces that support social inclusion and community wellbeing.
- Setting the framework for a high-quality built form outcome, accompanied by significant public benefits through the delivery of new and upgraded community faith-based facilities.
- Revitalisation of an underutilised CBD site through a high-quality urban marker development that contributes positively to the City Centre's built form, supports urban renewal, and strengthens the evolving visual and economic identity of Coffs Harbour.

9.3.1.2 Biophysical

The environmental impact assessment (**Section 8.0**) demonstrates that:

- The proposal would not have any significant effect on threatened species or ecological communities or their habitat arising from the construction or uses of the proposed development. The proposal will not have an impact on any matters of national environmental significance under the *Environmental Protection and Biodiversity Conservation Act 1999*, or the *Biodiversity Conservation Act 2016*; and
- The proposal will not result in any unacceptable and unreasonable adverse impacts on residential amenity, environmental amenity, traffic and transport, noise, wind, waste or heritage. General sources of risk associated with construction and operation works of the proposed development can be managed with the appropriate safeguards and mitigation measures as outlined at **Appendix S**.

9.4 Suitability of the Site

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development is suitable for the site for the following reasons:

- The proposal is permissible under the E2 Commercial Centre zone and strongly supports its objectives by delivering a true mixed-use development that reinforces the role of the City Centre as a hub for business, retail, community, and cultural activity.
- The site is currently underutilised. The development represents the highest and best use of the land, providing housing diversity (including affordable housing) and employment generating floorspace.

- It is consistent with the statutory controls under the CHLEP 2013 (as proposed to be amended under the Concurrent Rezoning process) and other relevant legislation.
- The site benefits from proximity to public transport, key road networks, and pedestrian connections, ensuring high accessibility and amenity for residents, workers, and visitors.
- The proposal responds appropriately to its context through building massing, setbacks, and design excellence. Traffic, overshadowing, privacy, and solar access impacts have been assessed and can be mitigated, ensuring no unacceptable adverse environmental impacts.

9.5 Public Interest

The public interest is best served by the orderly and economic use and development of land for permissible purposes in a form which is cognisant of and does not unreasonable impact on surrounding land uses and which satisfies a market demand.

Having regard to the public interest, the proposed development is in the public interest for the following reasons:

- The proposal will deliver up to 152 new dwellings, including 40 affordable homes, making a meaningful contribution to addressing Coffs Harbour's housing shortfall. This responds directly to Council's forecast need for approximately 12,800 new dwellings by 2041 and aligns with State objectives under the National Housing Accord and Housing Delivery Authority to accelerate housing supply in well-serviced locations.
- The provision of affordable housing will support access to housing for essential workers such as nurses, police, teachers, firefighters and paramedics, helping retain a stable workforce.
- By concentrating development within the Coffs Harbour City Centre, the proposal optimises access to existing infrastructure, services and transport, reduces pressure for greenfield expansion, and supports compact city and urban consolidation principles advocated by Council's more recent strategic framework.
- The development incorporates active ground-floor retail and commercial uses that enhance street activation along Gordon Street, Vernon Street and Riding Lane, reinforce the City Centre's economic role, and support local employment both during construction and ongoing operation.
- The built form demonstrates strong urban design principles, including a slender, articulated tower form, generous setbacks to sensitive interfaces such as Yarilla Place, and appropriate consideration of solar access, daylight penetration, wind comfort, and residential amenity.
- The proposed height and form are justified by site-specific constraints, including acid sulfate soils and a high water table, which necessitate above-ground parking solutions. This approach avoids significant environmental impacts while supporting feasible and efficient housing delivery in a central CBD location.
- The development creates public benefits through the provision of new community faith-based facilities, including place of worship, Wesley Hall Soup Kitchen, and Kids Ministry plus multipurpose spaces available for public/community use to support social and community needs.
- The proposal will deliver a catalyst project that encourages further investment in Coffs Harbour and contributes to its evolution as a vibrant, mixed-use regional city centre.

10.0 Conclusion

This Report has been prepared to consider the environmental, social and economic impacts of SSD-91539707 and concurrent amendments to the CHLEP 2013, for the construction of a mixed-use development comprising residential, commercial, retail, and community uses on land at 19A-21 Gordon Street, Coffs Harbour.

SSD-91539707 seeks approval for:

- Demolition of all existing structures on the site.
- Construction of a 26 storey building for use as a shop top housing development comprising ground level retail and community uses, podium basement parking and commercial uses, and above podium market and affordable apartments and rooftop.
- Landscaping and public domain works.
- Extension and augmentation of services and infrastructure as required.

Additionally, the amendments to the CHLEP 2013 under the Concurrent Rezoning process seek to:

- Amend the Height of Buildings Map under Clause 4.3 to increase the maximum building height from 44m to 90m; and
- Amend the Floor Space Ratio Map under Clause 4.4 to increase the maximum FSR from 4.5:1 to 8.1:1.

This Report has assessed the reasons justifying the carrying out of the proposed development, including consideration of biophysical, economic, and social factors, including the principles of ecologically sustainable development set out Section 193 of the EP&A Regs. In doing so this Report confirms that the proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective. The proposal is expected to have a positive impact on the surrounding locality. It will:

- Not result in any unacceptable adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- Realise the aims and objectives of the *North Coast Regional Plan 2041*, *Coffs Harbour Regional City Action Plan 2036*, *Coffs Harbour Local Strategic Planning Statement 2020*, *Coffs Harbour Local Growth Management Strategy 2020*, *Coffs Harbour Affordable Housing Strategy 2024* and *INVESTCOFFS Prospectus 2025*;
- Provide an outcome that is consistent with the relevant State Environmental Planning Policies and the Apartment Design Guide;
- Facilitate the delivery of a diverse housing supply and a mix of non-residential uses within a desirable location, close to existing transport options and amenities;
- Enable the delivery of much-needed housing supply that will contribute to achieving the Harbour's housing target of 12,800;
- Support the provision of direct and indirect jobs on site during the construction stage;
- Set the parameters to facilitate a high-quality built form outcome that will be accompanied by significant public benefits through the delivery of a new and upgraded community infrastructure and public domain.

It is therefore recommended that this SSDA be approved subject to standard conditions of consent, given that the proposed development:

- Is consistent with the relevant strategic planning framework and guidelines;
- Is consistent with the relevant statutory legislation and requirements;
- Will not generate unreasonable environmental impacts; and
- Is suitable for the site, and in the public interest.



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