

Your ref: SSD91539707

22 July 2026

Chris Eldred

Senior Planning Officer, Housing Delivery Assessments

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

Dear Chris

MIXED USE DEVELOPMENT AT 19A 21 GORDON STREET, COFFS HARBOUR - SSD91539707

I refer to the above-mentioned application and request for comments from the City of Coffs Harbour Council (City).

In summary, the City objects to the proposal in its current form due to excessive building height and bulk, lack of design excellence, and insufficient strategic justification for the significant departure from planning controls. The proposal's public benefits and urban design outcomes require further refinement and broader precinct-scale assessment.

- The development seeks an 88.9m building height and 8:1 floor space ratio, both exceeding the prescribed development standards, with concerns over parking shortfall and visual impacts.
- Key issues include inadequate view analysis, First Nations place-making, public realm impacts, pedestrian wind comfort, flood risk management, and waste handling.
- The proposal includes 40 affordable housing dwellings for 15 years, but the temporary nature of this benefit contrasts with the permanent planning uplift sought.

The following submission is prepared by staff in two parts, the first in response to the Department of Planning, Housing and Infrastructure, request for comments as the relevant Public Authority and the second as an adjoining landowner:

PUBLIC AUTHORITY COMMENTS

Planning and Urban Design:

Coffs Harbour Local Environmental Plan and Development Control Plan

Building height

The proposed building height of 88.9m above existing ground level is excessive and significantly exceeds the 44m height of buildings development standard prescribed by the Clause 4.3 Coffs Harbour Local Environmental Plan 2013 (LEP).

The Coffs Harbour City Centre Masterplan reinforces the allowable 44m building height under the LEP. However, it also identifies that that additional building height can be considered in circumstances where there are specific public benefits and where the height bonus is proportionate to public benefit and permitted building height.

Whilst it is accepted the proposal will have a significant public benefit through the delivery of housing supply including a mix of affordable housing, the proposed building height of 88.9m represents a significant departure to the 44m standard and does not have an acceptable height relationship with surrounding development.

A reduction in the overall building height is considered necessary to provide a more appropriate height relationship with surrounding development. This is particularly important for a prominent corner site within the City centre. Furthermore, a redesign to lower the building height will likely address other key issues including excessive building bulk and inadequate parking supply, which indicates that the proposal in its current form is an overdevelopment of the site.

The City's therefore strongly objects to the proposed building height and as detailed below, considers that there is no strategic justification for the building height as currently proposed.

Bulk and scale

The proposed floor space ratio of 8:1 is excessive and significantly exceeds the 4.5:1 floor space ratio prescribed by the Clause 4.4 of the Coffs Harbour Local Environmental Plan 2013.

The Coffs Harbour City Centre Masterplan reinforces the allowable floor space ratio however it identifies that that additional floor space ratio can be considered in circumstances where there is justified public benefit.

Whilst it is accepted the proposal will have a significant public benefit through the delivery of housing supply including a mix of affordable housing, the proposed floor space ratio of 8:1 represents a significant departure to the 4.5:1 floor space ratio standard. It is considered that the proposal is unacceptable in terms of building bulk and scale, which is particularly important for a prominent corner site.

A reduction in the overall gross floor area is considered necessary to provide a more appropriate relationship with the bulk and scale of surrounding development and to better align with the desired future character of the area.

Furthermore, a redesign to reduce the floor space ratio will likely address other key issues including excessive building height and inadequate parking supply, which indicates that the proposal in its current form is an overdevelopment of the site.

The City's therefore strongly objects to the proposed bulk and scale and floor space ratio.

Floor Space Ratio Calculation

The proposed Floor Space Ratio of 8:1 cannot be verified based on the information provided. A review of the submitted plans indicates that a number of areas appear to have been excluded from the Gross Floor Area calculations, including but not limited to the ground floor hallway, waste and storage areas, and various mezzanine spaces.

Should these areas be required to be included within the GFA under the relevant planning controls, the development may exceed the proposed FSR of 8:1 and result in a further departure to the current 4.5:1 standard. As such, further justification and detailed floor space calculations are required to demonstrate compliance with the applicable FSR standard.

Design Excellence

Development of the proposed height and scale should generally be set back from street frontages to provide building articulation, reduce perceived bulk and scale, and contribute to a human-scaled streetscape.

The comparable developments submitted in support of the proposal incorporate secondary street setbacks and/or increased articulation to the building facade, which assist in reducing visual massing and supporting higher building forms.

In contrast, the proposal presents extensive, largely unmodulated wall façades to both Vernon Street and in part Gordon Street, with limited articulation or variation in building form. This results in a development that appears visually dominant when viewed from the public domain and does not contribute positively to the streetscape character.

The proposal is therefore inconsistent with the design excellence provisions contained within Clause 7.12 of the Coffs Harbour Local Environmental Plan 2013 and Principle 1 Context and neighbourhood character & 2 Built Form and Scale & 3 Density provisions of SEPP (Housing) 2021.

Accordingly, the proposal is not considered to achieve design excellence and should be amended to include modulation and facade enhancement along Vernon Street.

State Environmental Planning Policy (Housing 2021) – Chapter 2 - Car Parking

Chapter 2 – Part 2 - Clause 22A of the SEPP (Housing 2021) is a development standard and sets out the requirements to provide car parking.

The proposal incorporates 173 car spaces. The parking study acknowledges this shortfall is between 10-20 spaces. As a development standard, it appears a 4.6 request to vary a development standard is required.

Further comments in relation to parking supply and opportunities to address parking are detailed below.

State Environmental Planning Policy (Housing 2021) – Apartment Design Guide

Chapter 4 - Clause 144 requires that the apartment design guide applies to residential apartment development which includes shop top housing and the residential component of development. The following key issues are identified:

Bicycle Parking

Objective 3J-2 requires that secure undercover bicycle parking is provided that is easily accessible from both the public domain and common areas. The bicycle parking appears to be in an impractical location and consideration should be made to redesign.

Natural Ventilation

Objective 4B-3 requires that at least 60% of apartments are naturally cross ventilated. Only 40% of units are naturally cross ventilated in first 9 storeys. The Application states 100%.

Common Circulation

Objective 4F-1 requires that the maximum number of apartments off a circulation core on a single level is limited to 8. Levels 7-10 have 10 apartments per floor reducing the amenity of the affordable housing component.

Urban Design and Strategic Planning

The positive aspects of the proposal, including the delivery of additional housing within the City Centre, affordable housing, active ground-floor uses and investment in public domain improvements, are acknowledged.

The proposal is generally consistent with strategic objectives that promote increased residential density, housing choice and urban consolidation within the City Centre. It is also recognised that the development addresses the importance of facilitating housing supply in appropriate locations.

Notwithstanding these benefits, concern remains that the scale of the proposed planning uplift has not been sufficiently justified through demonstrated urban design excellence, strategic merit and public benefit commensurate with the substantial departure sought from the City's current planning framework.

The principal issue is not whether a building of this scale can physically be accommodated on the subject site. Rather, the issue is whether the planning outcome sought represents the type of urban form, public realm and City character outcome that should be supported more broadly across the City Centre and whether it is consistent with the strategic vision established through the City's adopted planning framework.

Concerns primarily relate to:

- First Nations place-making and cultural landscape considerations;
- Public realm and human-scale city outcomes;
- Design excellence and skyline impacts;
- Strategic consistency with Council's adopted planning framework;
- Cumulative and precedent implications for future City Centre development; and
- Proportionality of the affordable housing benefit relative to the planning uplift sought.

Each of these concerns are addressed in more detail below:

First Nations Place-Making And Cultural Landscape

The applicant's commitment to engaging with Traditional Custodians and Indigenous stakeholders throughout the development of the proposal is acknowledged. However, the submitted material does not clearly demonstrate how consultation outcomes have influenced the final design response or how Aboriginal cultural values have been embedded within the proposal.

While Indigenous consultation is referenced throughout the documentation, it remains unclear how that engagement has informed:

- the landscape design;
- the public domain response;
- architectural expression;
- built form composition;
- interpretation opportunities; or
- broader place-making outcomes.

Accordingly, further information should be provided addressing:

- the nature and outcomes of consultation undertaken with Traditional Custodians;
- how consultation outcomes have informed the final design;
- whether specific design changes were made as a result of stakeholder feedback;
- opportunities for ongoing Indigenous involvement in landscape and public domain delivery; and
- opportunities to strengthen Indigenous place-making outcomes throughout the development.

Additionally, the proposal does not adequately address its relationship with the broader cultural landscape of Coffs Harbour. The proposed tower would become a prominent element within the City Centre skyline and materially alter the visual profile of the site. While detailed visual impact and urban design analyses have been undertaken, within the city centre's context. No consideration appears to have been given to how the development may relate to cultural landscape values and broader relationships between significant landscape elements.

The Coffs Harbour landscape is characterised by the interaction between:

- the coastline;
- the coastal plain;
- surrounding ridgelines and escarpments;
- prominent hills and headlands; and
- landscape features that contribute to Aboriginal understanding of place and Country.

The submitted material does not clearly demonstrate whether consideration has been given to:

- views between coastal and hinterland landscapes;
- culturally significant landscape relationships;
- broader cultural landscape values; or
- the implications of introducing a prominent vertical element into this setting.

The absence of these considerations represents a significant gap in the strategic justification of a development seeking this scale of planning uplift. There may be opportunities to achieve a more place-responsive architectural outcome. While the proposal seeks to establish a landmark building, the current design largely adopts a conventional podium-and-tower configuration. Further exploration could be undertaken to strengthen the relationship between the built form, local landscape character and Aboriginal connection to Country.

This may include:

- architectural responses informed by local landforms and coastal geography;
- building forms that better reflect the surrounding ridgeline context;
- greater integration between landscape and built form;
- Indigenous-led interpretation initiatives; and
- design responses informed by local cultural narratives.

True design excellence should reinforce local identity and strengthen the relationship between development, landscape and culture rather than simply delivering a visually prominent building.

Public Realm and Human-Scale City Outcomes

The reference or justification relating to the City's Public Realm Urban Design Guidelines throughout the entire application is not to be considered and does not align with the intent of

those guidelines. The intent of these guidelines is to provide design advice for areas within the LGA that do not have an adopted masterplan to guide them, as described on page 4 of the document. In this instance the City Centre Masterplan (masterplan) is the governing document. The proposed activation of the ground floor through retail, community and church-related uses and public domain improvements proposed as part of the development is recognised. However, concerns remain regarding whether the scale of the proposed built form is consistent with the long-term public realm outcomes envisaged by the City Centre Master Plan.

A fundamental objective of the Masterplan is the creation of a walkable, attractive and pedestrian-focused City Centre supported by a high-quality subtropical public domain. The public realm is intended to function as the primary organising element of future growth and intensification rather than becoming subordinate to individual development outcomes.

While the application demonstrates that the proposal may be capable of being accommodated on the site, limited consideration has been given to whether the urban form outcome established by the proposal would remain desirable if replicated more broadly throughout the City Centre. In particular:

- the relationship between the proposed tower scale and the established pedestrian environment requires further consideration;
- the transition between the public realm and the substantial podium form appears relatively abrupt;
- limited analysis has been provided regarding future solar and wind conditions and pedestrian comfort if this precedent leads to similar buildings occurring throughout the City Centre;
- street tree selections of Red Cedar (*Toona ciliata*) and silky oak (*Grevillea robusta*) are inconsistent within Masterplan and not appropriate as street trees due to their growth habit, form and function;
- insufficient consideration has been given to potential canyon effects within key streets; and
- further assessment is warranted regarding the implications for the subtropical character that has historically distinguished Coffs Harbour from larger metropolitan centres.
- The proposal includes a six-storey podium supporting an eighteen-storey residential tower. While the podium assists in accommodating parking and activation requirements, it remains a substantial built-form element that will have a significant visual presence within the public domain.

The additional design refinement should be explored, including:

- increased vertical greening;
- living façade treatments;
- deeper landscape integration;
- greater canopy provision;

- additional deep soil planting opportunities; and
- further measures to soften the perceived scale of the podium within the streetscape.

Importantly, the public realm impacts of the proposal cannot be fully understood in isolation. Broader cumulative assessment should be undertaken, demonstrating how public domain outcomes would be affected if comparable planning outcomes were achieved on surrounding City Centre sites, including but not limited to the visual impacts from the Jetty, Park Beach and West Coffs public domain areas.

Design Excellence, City Character and Skyline Impacts

It is acknowledged that the proposal seeks to deliver a landmark building within the City Centre and recognises that taller buildings may be appropriate in certain circumstances where they are supported by exceptional design outcomes and strong strategic justification. However, concerns remain regarding whether the scale of the proposed height uplift has been sufficiently justified through demonstrated urban design excellence. While the proposal introduces a distinctive skyline element, the design response achieves a level of design excellence not commensurate with the substantial departure sought from the existing planning controls.

At its meeting of 7 December 2017, the City of Coffs Harbour resolved to endorse a Review of Coffs Harbour CBD Height and Built Form Controls. This review included a significant strategic body of work and identified an uplift in height from 17m to 44m and an increase to floor space ratios from 2.5:1 to 4.5:1, while embracing the vision and driving principles outlined in the Coffs Harbour City Centre Master Plan.

The proposal significantly departs from this strategic framework. Whilst there may be justification for some additional height uplift on this site, the proposed uplift is not supported as it does not align with the vision and driving principles outlined in the Coffs Harbour City Centre Master Plan. A suitable height uplift to 60m may be supported with additional justification for its alignment with the Coffs Harbour City Centre Master Plan and that there will be minimal precedential impacts on the broader City Centre. In particular:

- the transition between the prevailing City Centre character and the proposed tower form appears abrupt;
- the proposal introduces a building form substantially exceeding the scale contemplated by the current planning framework (see above);
- the tower exhibits no modulation relative to its height and skyline prominence;
- further assessment is required regarding impacts on important views to the western mountain backdrop, views to the coastline and impact on Mutton Bird Island;
- limited analysis has been provided regarding the contribution of the tower to the desired future skyline character of Coffs Harbour; and

- consideration should be given to additional architectural articulation, tower shaping and built form transition measures capable of reducing perceived bulk and improving contextual integration.

A proposal seeking significant planning uplift should demonstrate:

- a distinctive response to local character;
- Integration and consideration of existing landscape and view lines;
- a high level of architectural innovation;
- exemplary public realm integration;
- strong landscape outcomes;
- responsiveness to climate, topography and place; and
- a contribution to a coherent and desirable future City Centre form.

At present, further work is warranted to demonstrate that the proposal satisfies this threshold.

Strategic Consistency, Cumulative Impacts and Precedent

The principal concern relates to the strategic implications of the planning uplift sought. The proposal generally aligns with strategic objectives promoting increased housing supply and higher residential densities within the City Centre. However, the scale of development proposed exceeds the planning assumptions underpinning the Coffs Harbour Local Environmental Plan 2013, City Centre Master Plan and broader growth planning framework. A key issue is that the proposal effectively seeks a precinct-scale planning outcome through a site-specific process.

While planning proposals must be assessed on their merits, significant site-specific increases in development capacity have the potential to influence future development expectations and establish a benchmark against which subsequent proposals are measured.

Consequently, assessment should extend beyond whether this individual proposal is acceptable and consider whether the urban form outcome established would be desirable if replicated across the broader City Centre. The submitted material does not adequately demonstrate:

- how similar building heights on other City Centre sites would affect public realm outcomes;
- how equivalent development intensity would affect solar access, wind conditions and pedestrian amenity;
- how widespread adoption of similar outcomes would influence skyline character;
- how the proposal aligns with the planning assumptions underpinning Council's adopted strategic framework; or
- why a precinct-wide strategic review is not the more appropriate mechanism for considering a shift of this magnitude.

Numerous Australian centres have experienced progressive increases in building heights following initial site-specific departures from established controls. While each planning context

differs, these examples demonstrate the importance of considering cumulative impacts and broader strategic consequences when assessing proposals that substantially exceed adopted planning settings. Additional precinct-scale analysis is warranted before amendments to the planning framework are supported.

Affordable Housing and Proportionality of Public Benefit

The delivery of approximately 40 affordable housing dwellings, which recognises affordable housing as a significant public benefit, is supported. However, the public benefit offered should be proportionate to the permanent planning outcome being sought.

The proposal seeks a permanent increase in height and development capacity through substantial departures from existing planning controls. In contrast, the affordable housing commitment is proposed to operate for a period of only 15 years. This creates a potential disconnect between:

- the permanence of the planning uplift being conferred; and
- the temporary nature of the community benefit being provided.

If affordable housing is to remain a primary justification for the requested uplift, a substantially longer affordability period should be explored, preferably secured in perpetuity. It remains unclear whether the scale and duration of the public benefit is sufficient to justify the extent of the permanent planning uplift sought.

Conclusion

The proposal would deliver significant housing supply, affordable housing outcomes, ground-floor activation and public domain improvements within the City Centre. However, there is concern that the magnitude of the planning uplift sought has not yet been matched by a demonstrated level of strategic merit, urban design excellence and enduring public benefit sufficient to warrant departure from the adopted planning framework.

In particular, further work is warranted regarding:

- First Nations place-making and cultural landscape considerations;
- public realm and human-scale city outcomes;
- skyline impacts and design excellence;
- consistency with the adopted strategic planning framework;
- cumulative and precedent implications for future City Centre development; and
- the proportionality of the affordable housing benefit relative to the permanent planning uplift sought.

For these reasons, further strategic justification and broader precinct-scale assessment is requested prior to supporting any amendment to the planning framework associated with the proposal.

Traffic, Parking And Pedestrian Wind Assessment:

Traffic and Access

The development would be required to provide a replacement pedestrian (zebra) crossing located between the existing location and the Gordon Street / Vernon Street roundabout (RAB) with other inclusions listed below in 'Notes'. This is consistent with the general principles in the City Centre Master Plan which nominates this RAB as a site for a potential 'roundabout retrofit' to improve pedestrian access. Appropriate modifications to the Gordon Street / Vernon Street roundabout (RAB) to accommodate the above zebra crossing and any necessary amendments to the Vernon St western approach to the RAB to accommodate the parking adjoining the subject site. The RAB is to be remodelled with SIDRA to test the modifications.

Pedestrian access has not been adequately provided in regard to the proposed removal of the pedestrian (zebra) crossing on Gordon Street. The development is to replace this with a raised pedestrian (zebra) crossing located between the existing crossing location and the Gordon Street / Vernon Street roundabout including:

- provision of kerb extensions at the raised zebra crossing on both sides of Gordon Street,
- removal of the redundant kerb extension on the east side of Gordon street and replacement with angled parking,
- associated drainage works,
- modifications to roundabout circulating / entry / exit lanes to ensure the new raised zebra crossing is only traversed by a single traffic lane each way, and
- revised SIDRA modelling of the Gordon Street / Vernon Street roundabout based on above modifications.

Parking

Overall, it is considered there is a shortfall of 10-20 spaces when considering a reduced uptake of car-sharing and when comparing with other parking provision rates in TfNSW's Guide to Transport Impact Assessment (refer to estimates using these rates in table in background attachment to this submission).

Alternatives to the on-site provision of parking must be investigated with the City under a Public-Private Partnership arrangement e.g. provision of a new level on the Castle St carpark which provides about 80 parking spaces which could replace the requirement of 'Shared Retail, Office & Church Parking' and 'Visitor' parking and effectively remove 2 levels of podium parking from the site. The proposal to provide above-ground parking compared to basement parking is considered reasonable given the cost per space which would increase with deeper levels. A combination of

basement and podium parking would impact on usable space on the ground level due to multiple ramps from building entry to access both podium and basement.

In summary:

- The development proposes 173 car spaces with the following breakup (Note: 180 spaces are shown on drawings including 7 spaces on mezzanine level):
 - Individual Residential Parking: 134 spaces
 - Car Share Residential Parking: 6 Spaces
 - Shared Retail, Office & Church Parking: 33 spaces
- The proposed car-share is supported however the uptake is considered overly-optimistic (1 space equivalent to 6 private parking spaces). A more conservative uptake of ~ 10% of residences in the future – refer to estimates in table in ‘Background Information’.
- Accessible parking provision is considered acceptable: 3 accessible spaces provided (1.67% of total spaces > 1% required). Also noting that there is good provision of public accessible spaces in the adjoining car space which would be relatively free during church services.
- Basement parking considerations: the proposal to avoid basement parking is considered reasonable.

While basement parking is considered more desirable from an urban design perspective, the on-site parking requirement would require multiple levels of basement parking which would be cost-prohibitive (potentially > \$130k/parking space based on costs for Yarrila Place).

A combination of basement plus podium parking would impact significantly on usable space on the ground level due to multiple ramps from the access to go both up and down from building entry.

Public Transport

It is noted that the ‘bus hub’ concept on Vernon Street referenced in Section 4.3 of the Traffic and Parking Assessment is no longer being pursued by the City. The Park Avenue will remain the ‘bus hub’ in the foreseeable future. This change is not considered to have an impact on the Traffic and Parking Assessment.

Cycling network

It is noted that a dedicated cycleway along Gordon Street referenced in Section 4.3 of the Traffic and Parking Assessment is not currently being pursued by the City. This change is not considered to have an impact on the Traffic and Parking Assessment.

Pedestrian Wind Assessment

The Pedestrian Wind Assessment demonstrates that the proposed development will generally provide acceptable Pedestrian Standing and Pedestrian Walking wind conditions throughout the

public domain and therefore achieves a satisfactory outcome for general pedestrian circulation and access.

However, if the design intent is to create a flexible gathering space and activate the Riding Lane and Vernon Street frontages with retail, outdoor seating and lingering opportunities, the more stringent Sitting or Dining wind comfort criteria would be the more appropriate benchmark, and the assessment does not demonstrate that these higher amenity objectives can be consistently achieved:

- The Pedestrian Wind Assessment indicates that local mitigation measures are likely to be required for any locations intended for outdoor seating/dining such as the Riding Lane frontage. The assessment generally finds Standing and Walking conditions are achieved rather than the desired Sitting or Dining conditions (in regard to the Lawson criteria used in the assessment). The Design Report notes that the Riding Lane frontage landscaped areas will incorporate elements and flexible gathering areas to support a range of community activities such as: market days, pop-up events, and informal social gatherings. The wind assessment does not demonstrate suitability for these activities. The Riding Lane frontage (and the Vernon Street frontage) should achieve a Lawson Sitting comfort criterion and be verified by the wind consultant.
- The report identifies various mitigation measures (wider awning, vertical wind screens, dense landscaping) however none have been tested / modelled to determine their effectiveness nor resolution with other design considerations (eg architectural). It is recommended that detailed wind mitigation measures are to be resolved in the final plans and verified by the wind consultant.
- A localised wind safety issue has been identified at the western tower corner (Location 10 – corner of Vernon Street and Riding Lane), where conditions exceed the Lawson safety pass criterion and are classified as "Able-Bodied". Approval should be subject to conditions requiring detailed wind mitigation measures, verification by the project wind consultant, and confirmation that the affected location achieves an acceptable pedestrian safety outcome.

Flooding:

A review of the EIS, flood assessment report and plans was undertaken having regard to the SEARs, clause 5.21 of the Coffs Harbour Local Environmental Plan 2013, Part E4 of the Coffs Harbour Development Control Plan 2015, and section 9.1 Local Planning Direction 4.1.

The EIS and flood assessment do not provide sufficient detail to adequately address the SEARs in relation to flooding, clause 5.21 of the Coffs Harbour Local Environmental Plan 2013, and section 9.1 Local Planning Direction 4.1 – Flooding.

In summary, further information is required to:

- Address on-site flood risk up to the Probable Maximum Flood, using only the latest flood risk information from the adopted Coffs Creek Floodplain Risk Management Study (WMAwater, 2025).
- Justify that the development minimises risk to life and property, including any proposed reduction in freeboard for finished floor levels relative to the 1% AEP flood level.
- Address the potential effects of climate change using the information available in the Coffs Creek Floodplain Risk Management Study (WMAwater, 2025).
- Adequately address safe occupation and efficient evacuation in the event of a flood, including assessment of risk up to the Probable Maximum Flood and how the development proposes to manage that risk.
- Adequately address the inconsistency to s9.1 local planning direction 4.1

It is recommended that the proponent be requested to provide a revised flood assessment and supporting design information addressing the matters outlined below before the proposal is further considered.

Use of the latest flood risk information

The flood assessment report includes flood risk information and flood planning levels based on a superseded flood study. The assessment should address on-site flood risk up to the Probable Maximum Flood, and climate change flood risk, using only the adopted [Coffs Creek Floodplain Risk Management Study \(WMAwater, 2025\)](#).

The flood assessment report should not rely on superseded flood planning levels to justify lowering the flood planning level or reducing the freeboard requirements for finished floor levels to the 1% AEP flood level. The flood assessment report includes flood risk information and flood planning levels based on a superseded flood study. The assessment should address on-site flood risk up to the Probable Maximum Flood, and climate change flood risk, using only the adopted Coffs Creek Floodplain Risk Management Study (WMAwater, 2025).

The flood assessment report should not rely on superseded flood planning levels to justify lowering the flood planning level or reducing the freeboard requirements for finished floor levels to the 1% AEP flood level.

Reduction in the required finished floor level

The plans and flood assessment report indicate proposed finished floor levels of 4.15 mAHD for the ground floor retail areas on the corner of Gordon and Vernon streets, and 4.3 mAHD along Riding Lane, Vernon Street closest to Riding Lane, and Gordon Street closest to Yarrila Place. The finished floor level for the place of worship is 4.3 mAHD. All car parking and residential habitable areas are above 8.8 mAHD, with the residential lobby at 4.3 mAHD.

The flood information from the Coffs Creek Floodplain Risk Management Study (WMAwater, 2025) indicates a flood planning level (1% AEP plus 500mm freeboard) that varies from 4.44 mAHd (corner of Gordon and Vernon St) to 4.8 mAHd (Riding lane closest to Yarrila Place). The flood planning level at the centre of the lot is 4.59 mAHd. See figure 1 for details of the nearby 1% AEP flood level and flood planning level.

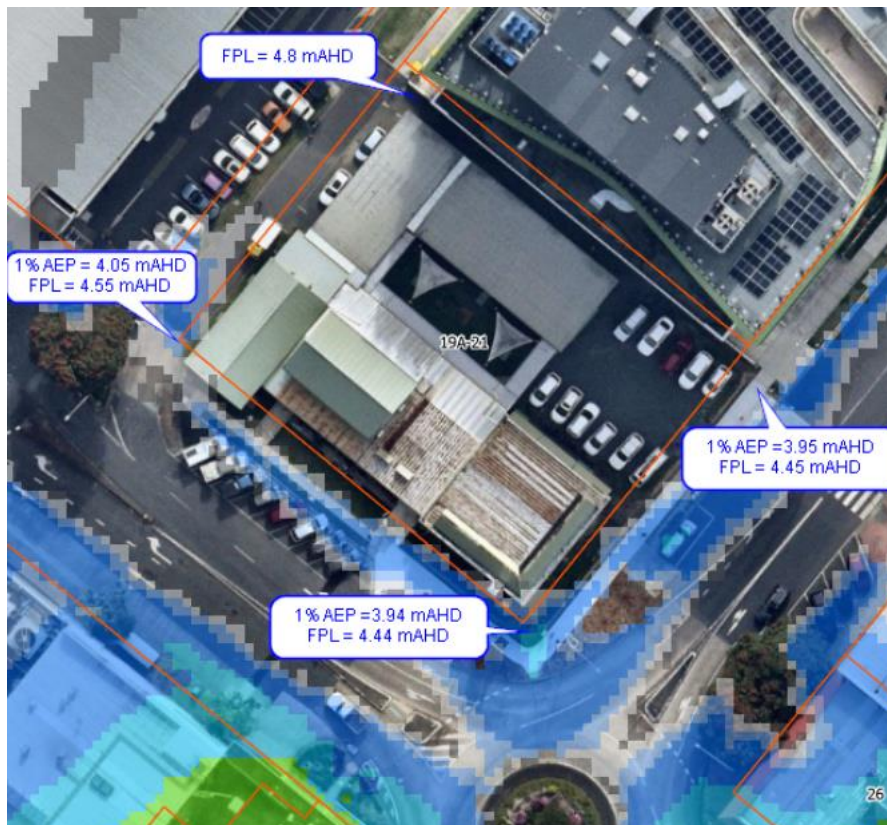


Figure 1. 1% AEP flood level and flood planning level across the site

The proposed floor levels provide less than the required 500 mm freeboard to the nearest 1% AEP flood level for commercial development under Part E4.4 of the DCP. The flood assessment report seeks to justify this by adopting the superseded flood planning level of 4.3 mAHd, incorporating flood-compatible building measures below that superseded flood planning level, and indicating that the current flood planning level would impose undesirable constraints on the public domain. This is not considered an adequate justification.

The City would only support a reduction in freeboard to the current 1% AEP flood level provided adequate justification is provided taking into account adjoining land uses and floor level, flood levels, access constraints, fill requirements and the existing development.

Based on the survey plans, the existing place of worship floor level is 4.98 mAHd, and neighbouring Yarrila Place is 4.75 mAHd. The Yarrila place floor levels appear to have been

The flood assessment report does not adequately address the potential risk of climate change on the development. The Coffs Creek Floodplain Risk Management Study (WMAwater, 2025) includes a number of 1% AEP climate change scenarios, including both the impacts of sea level rise and increase in rainfall intensity.

The study indicates that the 1% AEP flood level across the site may increase by approximately 300mm in the medium term (based on sea level rise of 0.4 m and rainfall increase of 9.5%) and 550mm in the long term (based on sea level rise of 0.9m and rainfall increase of 19.5%). Given these increases the proposed floor level of 4.3mAHD would mean the building would be at risk of inundation in the 1% AEP in the medium term. The higher suggested minimum floor levels identified above would reduce the risk of the development being affected by climate change impacts.

Emergency Management Measures in the event of a flood

The flood assessment report does not adequately address safe occupation and efficient evacuation of the development in the event of a flood. The assessment does not consider the full range of flooding relevant to emergency response measures and has only considered egress in the 1% AEP flood. The area is considered a low flood island, with evacuation routes likely to be flooded in events rarer than the 1% AEP and the ground floor of the building flood-prone in events rarer than the 1% AEP.

Given that the proposal would significantly increase the number of residents living on flood-prone land, the assessment should include details of how evacuation of residents would be enabled, whether evacuation is achievable, and the potential risk and duration of isolation during flood events up to the Probable Maximum Flood.

If the emergency management measures include shelter in place, the assessment should address the [NSW Shelter in place guidelines](#) and explain how the development would manage the associated shelter-in-place risks, including secondary flood risks.

Inconsistency with Local Planning Direction 4.1

The planning proposal will significantly increase height limits within the flood planning area, which may permit a significant increase in the development and/or dwelling density of that land. As such the inconsistency with local planning direction should be adequately justified in the EIS and/or flood assessment report.

Water Sensitive Urban Design:

A review of the EIS, stormwater management and plans was undertaken having regard to the SEARs, clause 5.21 of the Coffs Harbour Local Environmental Plan 2013, Part E4 of the Coffs Harbour Development Control Plan 2015. The stormwater management plan includes the

management of water quality complying with the City's pollution reduction targets and is considered acceptable.

The MUSIC Link report listed in the Stormwater Management Plan attachments is not visible in the document, however given compliance with the targets and the use of a SQIDEP approved device this can be reviewed as part of the detailed design as it is unlikely to significantly impact the design.

These matters could be addressed in conditions of consent if the application was to be approved and the City would welcome the opportunity to provide conditions of consent for consideration if required.

Acid Sulphate Soils and Asbestos Management:

Acid Sulphate Soils Management Plan

The preliminary geotechnical investigation and Acid Sulfate Soil (ASS) assessment provide sufficient evidence at the SSD stage to demonstrate the presence and nature of acid sulfate soils likely to be encountered by the development and identify a feasible management and treatment methodology. The Acid Sulfate Soil Management Plan (ASSMP) establishes an appropriate framework for management of ASS during excavation activities and is considered adequate to support assessment of the development application.

Notwithstanding, the geotechnical assessment notes that the final excavation design, construction methodology and associated spoil management arrangements remain subject to detailed design. Accordingly, a revised site-specific ASSMP should be prepared prior to the issue of a Construction Certificate (or prior to bulk excavation works) to confirm the final volume of excavated material, dewatering requirements, treatment or off-site disposal methodology, validation testing frequencies and waste classification/disposal arrangements based on the approved construction design.

Building relocations

Appendix HH – Construction & Demolition Waste Management Plan indicates that relocation of two of the existing buildings is being considered as an alternative to demolition. Given the apparent age of these buildings, asbestos-containing material (ACM) is likely to be encountered.

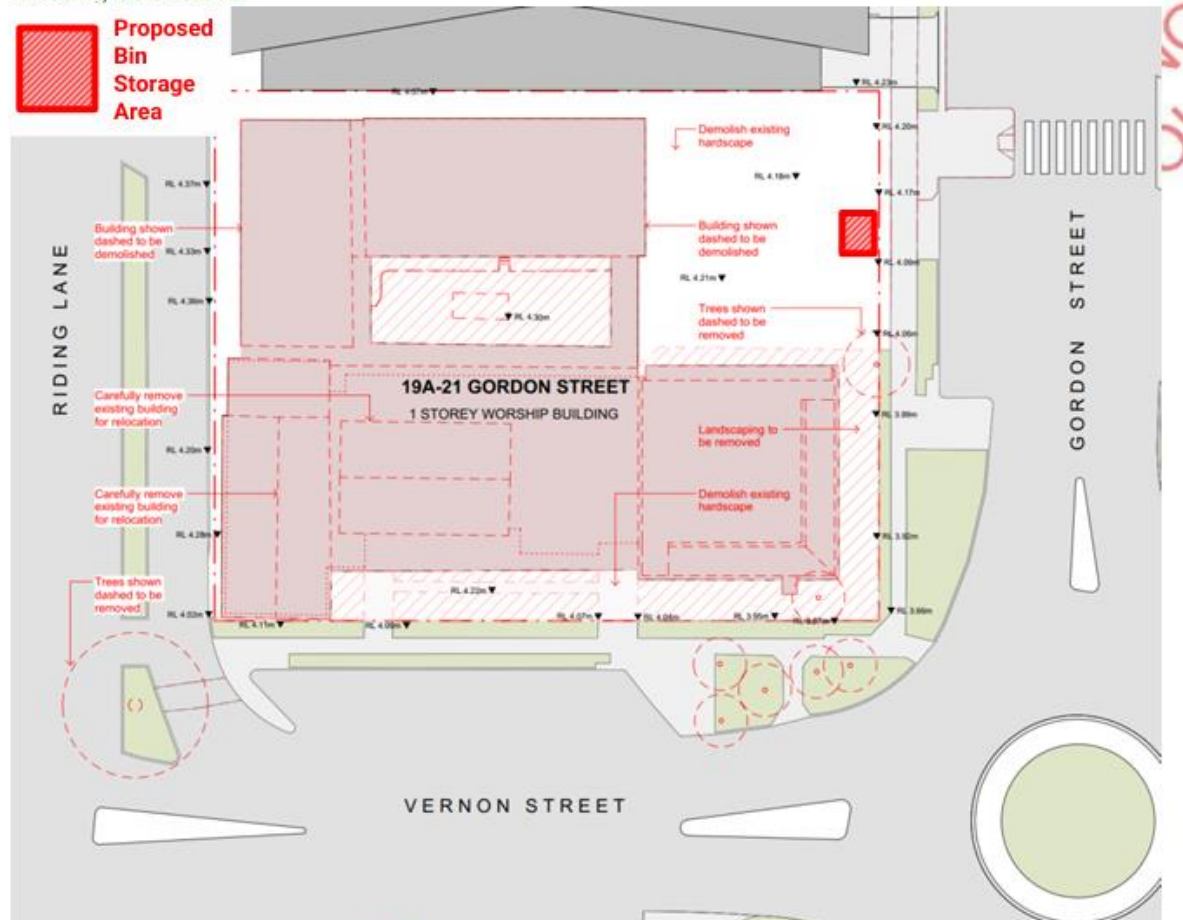
While building relocation is supported in principle as a means of retaining and reusing existing building stock, the Applicant should be aware that relocation of older structures may be constrained where asbestos-containing materials are present. SafeWork NSW guidance (Safety Checklist: Relocating or Raising Houses | SafeWork NSW) advises that all ACM must be identified

and removed before relocation, with transport of structures containing ACM requiring a specific exemption.

The consent authority should ensure that any future building relocation proposal is supported by appropriate structural, hazardous materials and transport assessments demonstrating compliance with applicable SafeWork NSW requirements.

4.6 Site Plans

Existing Structures



Note: the proposed bin location is indicative only, this may change based on site logistics.

Sewer and Water:

The proposed development lot is serviced with sewer main from Riding lane which will require a new connection point cut in. The landscape and streetscape improvements proposed in Riding Lane will need to be considered in the context of the sewer main location in this area. The sewer main is near the lot boundary and will likely need to be relocated.

Water would be from Gordon St Main, but development would need storage for fire and depending on design might struggle for service pressure on top floors.

Waste:

The City's Waste Management Section has reviewed the submitted documentation and provides the following comments for consideration as part of the assessment of this State Significant Development application:

- The Waste Management Plan appropriately identifies that all residential waste services will be undertaken by The City's nominated waste management contractor. The proposed residential bin configuration and servicing arrangements are supported.
- A dedicated loading zone is required to be provided on Gordon Street for the purpose of servicing the development by waste collection vehicles. The loading zone is to be appropriately located to enable safe and efficient collection operations. This is not currently shown on plans. Should this not be provided alternate waste collection locations need to be investigated.
- The proposed waste chute system is not supported. The NSW Government has legislated the statewide rollout of Food Organics and Garden Organics (FOGO) services, requiring all households receiving a residual waste collection service to have access to a FOGO service by 1 July 2030. Waste management infrastructure within the development is therefore required to facilitate the effective source separation, storage and collection of general waste, recycling and FOGO waste streams. The proposed chute system has not demonstrated how these waste streams will be effectively segregated and managed without contamination. Accordingly, dedicated waste collection cupboards and/or waste storage rooms should be provided to enable the separate storage and collection of all required waste streams.
- All waste streams should be collected and stored in a dedicated waste collection cupboard on each floor and moved internally by building maintenance staff, and/or a central waste storage room that enables effective separation and management of all required waste streams.
- A Section 88B Instrument should be applied to ensure ongoing access and servicing arrangements for waste management infrastructure and collection activities.
- The proposed bin transfer route between the waste storage areas and the collection vehicle is problematic and requires further consideration. The plans should demonstrate a direct and practical path of travel suitable for the movement of large mobile garbage bins. The route should be free from steps, kerbs, level changes, steep gradients and tight corners and should provide suitable access across the verge to the parked waste collection vehicle.
- The City prefers that commercial waste storage rooms, residential waste storage rooms and bulky goods storage rooms provide direct external access where practical to improve operational efficiency and reduce manual handling requirements.

- Access arrangements should ensure that The City's waste management contractor is able to readily access all relevant waste storage areas on collection days. Where waste storage rooms are secured, appropriate access fobs, swipe cards or equivalent access devices will be required to be provided and maintained to enable authorised collection staff to access waste rooms and undertake servicing activities.
- Bulky waste collection will not occur directly from the bulky goods storage room. All bulky waste items will need to be relocated by building management staff from the bulky goods room to the agreed collection point for servicing by the collection vehicle. The Waste Management Plan should be updated to reflect this operational requirement.
- The proposed bin storage rooms appear to provide adequate capacity; however, all storage rooms should be designed in accordance with the relevant Development Control Plan requirements.
- Waste storage rooms (including residential and commercial waste storage areas) should:
 - be appropriately sized to accommodate all nominated waste streams;
 - be drained to sewer via a dry basket arrestor;
 - be bunded to contain liquid spills and wash-water;
 - be fitted with a hose cock to facilitate cleaning;
 - provide adequate ventilation, wash-down facilities and manoeuvring space; and
 - comply with all relevant requirements of The City's Development Control Plan.

These comments should be considered during the assessment of the proposal and in the finalisation of the Waste Management Plan and associated building design.

ADJOINING LANDOWNER COMMENTS

Continuity of Civic Services

The proposal should demonstrate how both the construction phase and future operation of the development will avoid disruption to the continuity of Yarrila Place's civic and community services. Council would expect ongoing engagement with Yarrila Place representatives throughout design, construction and commissioning phases.

Interface with Civic Precinct Function

Consideration should be given to future interactions between residential, community, worship, commercial and civic uses, particularly where operational requirements may differ.

Future Maintenance and Building Operations

Adequate separation should be maintained to allow future maintenance, cleaning, façade access and building management activities for both properties without unreasonable constraints. Potential impacts on access to plant, service infrastructure and emergency systems should be addressed.

Major Event and Community Activity Impacts

Yarrila Place hosts council meetings, cultural programs, exhibitions, community events and civic functions attracting significant visitation. The development should demonstrate how these activities can continue to operate effectively during both construction and occupation phases.

Future Development Constraints on Civic Assets

Consideration should be given to whether the scale, bulk and proximity of the proposal could create future operational constraints on upgrades, maintenance or expansion of Yarrila Place and other civic facilities within the precinct. Future access rights, servicing arrangements, crane oversail requirements and maintenance zones should be clearly understood and managed.

The City recommends that the applicant provide the following:

- Yarrila Place Operational Interface Management Plan: Covering access, security, emergency access, servicing, event coordination, public safety and continuity of civic services.
- Cumulative Parking and Traffic Review: Not just the development's internal parking, but its effect on public parking and civic precinct parking relied on by Yarrila Place users.
- Emergency Access and Evacuation Interface Assessment: Including any impacts on emergency vehicle movements, evacuation routes and assembly areas for both sites.
- Security and After-Hours Interface Plan.
- Construction Communication Protocol with the City: Including advance notice of disruptive works, road or footpath changes, service interruptions, crane operations and high-noise activities.

For further information please contact the undersigned on 66408 4000.



Luke Perry
Group Leader Sustainable Places

Attachment 1 – Background information relating to traffic and parking comments

Car Parking

	DCP Rates	SEPP (Housing)	GTIA (TR calcs)				
			High density dwelling / Category 2 (see notes below)		High density dwelling / Category 3 (see notes below)		Preferred scenario
Apartments:			Rate	No. Spaces	Rate	No. Spaces	No. Spaces
1 bdrm (34)	34						
2 bdrm (104)	104						
3bdrm (14)	28						
visitors	30	30		30		30	
Aptmnts - Affrdble							
1 bdrm (20)		(0.4) 8		(0.4) 8		8	
2 bdrm (20)		(0.5) 10		(0.5) 10		10	
Aptmnts – Stndrd							
1 bdrm (14)		(0.5) 7	0.6	9	1.0	14	
2 bdrm (84)		(1.0) 84	0.9	76	1.3	109	
3bdrm (14)		(1.5) 21	1.4	20	1.5	21	
Sub-Total	196	160		153		192	
Office	19	19		19		19	
Retail	10	10		10		10	
Church	10	10		10		10	
Total	235	199		192		231	212

Shortfall*	55	19		12		51	32
Car-Share considerations							
10% uptake scenario							
Total Requirements	221 (196 x 0.9 + 39 + 6 car-share spaces)	189 (160 x 0.9 + 39 + 6 car-share spaces)		183 (153 x 0.9 + 39 + 6 car-share spaces)		218 (192 x 0.9 + 39 + 6 car-share spaces)	201
Shortfall*	41	9		3		38	21
15% uptake scenario							
Total Requirements	212 (196 x 0.85 + 39 + 6 car-share spaces)	181 (160 x 0.85 + 39 + 6 car-share spaces)		175 (153 x 0.85 + 39 + 6 car-share spaces)		208 (192 x 0.85 + 39 + 6 car-share spaces)	192
Shortfall*	32	+1		+5		28	12

* Proposed parking provision (including 7 on mezzanine) = 180 based on drawings (173 based on text in Traffic and Parking Assessment)

Car-share:

- if there is a 10% uptake – say 10% of residential parking spaces (15-20 spaces) will be replaced with the proposed 6 car share spaces (a reduction in the requirement of car spaces by 11-14 spaces)
- if there is a 15% uptake – say 15% of residential parking spaces (23-30 spaces) will be replaced with the proposed 6 car share spaces (a reduction in the requirement of car spaces by 17-24 spaces)

8.5.1 Car parking categorisation

The new context-based parking rates recognises that the demand for parking can be influenced by a range of factors outlined in this section. It requires the identification of the category where the development is located.

Across NSW, transport accessibility can vary significantly, reflecting the diverse geography, population distribution, infrastructure and economic activities throughout the state. Inner metropolitan areas, urban centres, suburban areas and regional areas present different transportation challenges and opportunities. A categorisation approach at a Statistical Level 2 (SA2) scale has been adopted to reflect this variability, based on key indicators that influence parking demand. These indicators are:

- Within 15 minute walk to a strategic centre
- Within 30 minutes public transport to a strategic, regional or metropolitan centre
- Car mode share (all trip purposes)
- Population density.

The generalised performance of each indicator for each category is presented in Table 8.2.

Table 8.2. Summary of categorisation of NSW

Indicator	Sub-Category 1A	Category 1	Category 2	Category 3
Within 15 minute walk to a strategic centre	Very high	Very high	High	Low
Within 30 minute public transport to a strategic, regional or metropolitan centre	Very high	Very high	Medium	Low
Car mode share (all trips)	Low	Medium	Medium	High
Density (people/km ²)	Very high	High	Medium	Low

Category 1: Typical of urban areas with high alternative transport options and low car mode share.

Within this category, **Sub-Category 1A:** is identified as areas with higher density and lower car mode share than typical urban areas. This sub-category is typical of inner metropolitan areas where local councils are trending to mandate lower parking provision compared to other areas within **Category 1**.

Category 2: Typical of outer urban areas or regional centres with more variability in alternative transport options and medium car mode share.

Category 3: Typical of regional areas or outer urban areas with low or limited alternative transport options, low population density and high car mode share.

Given the large zone structure for the categorisation, there may be highly accessible developments in a lower category zone and vice versa. Practitioners are encouraged to present and analyse technical evidence to understand the parking demand associated with the development. For example, reference rates could be considered in the following ways:

- If the development is well serviced by alternative transport options and has a low expected car mode share for trips entering and exiting the development, provide less parking than the reference rate of parking.
- If the development has limited alternative transport options, with a high expected car mode share for trips entering and exiting the development, provide parking at or above the reference rate.

The webmap containing the SA2 categorisation can be accessed via this [link](#).