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TOORMINA 2452  
20 October 2019

**ATTENTION: DIRECTOR - KEY SITE ASSESSMENTS**

**PLANNING AND ASSESSMENT**

**DIRECTOR OF PLANNING, INDUSTRY AND ENVIRONMENT**

**GPO BOX 39**

**SYDNEY 2001.**

Dear Director,

**State Significant Development Application Number SSD-10300**

**Coffs Harbour Cultural and Civic Space.**

I offer the following objections to the above Development Application :

1. the Brief variation, to now include (unnecessary) council offices;
2. the Brief variation to exclude a Performing Arts Centre, which has the potential to create more income and interest from within and beyond Coffs Harbour than most functions within the Centre;
3. the high cost of the project in relation to both local funds available, and the average income within the region;
4. the location of the building
  - (i) being in a commercial region of the CBD and restricted in access, both current and future, to open landscaping and parkland.
  - (ii) not being on one of the major roads linking the City Centre and Coffs Harbour's iconic jetty (which would create easier access, easier "findability", and greater visibility to tourists and locals wandering through the city);
5. the 3 storey element of this building, creating the need for very costly expenditures on items such as, but not limited to, lifts, fire stairs, formwork, scaffolding, cranes, access to higher floors during construction and maintenance;

6. inadequate parking, both internal and external, creating congestion for all forms of travel to and from, and within, the vicinity of the construction, and exacerbating in the future, an already-heavily congested area of the CBD;

7. it is not in the public interest, as it is not economically sustainable providing for unnecessary office space for Council staff, given that office space is approximately 10% less than the current Council Chambers. In duplicating office space, it therefore fails to meet an objective of the B3 Commercial Core Zone to "**provide a suitable land use that serves the needs of the local and wider community**";

8. it is disruptive to the streetscape rhythm in that it is out of character with nearby development, provides an unsafe arcade, and fails to meet the objective of the B3 Commercial Core Zone to "**ensure that the design of new commercial buildings makes a positive contribution to the streetscape through opportunities for improved pedestrian links, retention and creation of view corridors and the provision of a safe public domain**";

9. it conflicts with the streetscape of Gordon St in that the proposed building is outside the context of this street, having regard to the scale, existing street setbacks, design and general form of the adjoining buildings;

10. it does not meet the safer-by-design principles and guidelines as it provides a covered arcade between Riding Lane and Gordon St that jumbles territorial space, provides cover for potential criminal activity, and hinders good surveillance;

11. it exceeds the height limit of 28 metres as set down by Council, and an exception is not justified;

12. a smaller, creative building linked to, but just outside of, the CBD, has much more appeal as a Civic Centre, and

(i) provides greater opportunity for sculptural elements to be incorporated into the landscape surrounds (unrestricted by buildings abutting/boundaries adjacent).

(ii) provides potential for interesting and creative ceiling forms.

(iii) would be, potentially, far cheaper than multi-storey construction .... this is respect of this space being primarily day-time use (where solar panels can provide most of the energy for any thermal disadvantage of smaller buildings).

(iv) the present design/height limit lacks the option for income-producing design elements such as a restaurant with potential harbour views, or small scale residential development, which could financially support the proposed project.

Yours sincerely ..... Graeme Dyball

