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MY PERSONAL INFORMATION BEFORE
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DATE: *22/10/19.*

ATTENTION: DIRECTOR – KEY SITE ASSESSMENTS

**PLANNING AND ASSESSMENT
DEPARTMENT OF PLANNING, INDUSTRY AND ENVIRONMENT,
GPO BOX 39,
SYDNEY NSW 2001**

Dear Director,

State Significant Development Application Number SSD-10300.
Coffs Harbour Cultural and Civic Space.

I object to this proposal and desire and request that a public hearing be held.

The reasons why I object to this proposal are:

THERE won't be a significant space for Arts.
Population growth, and impact on traffic movements and car parking.

The projected population growth will accelerate the growth in number of vehicles and vehicle movements in the CBD. It will also significantly increase the demand for parking spaces in the CBD.

The modelling shown in the DA documentation is optimistic to the extent that the projected increase in vehicle movements is less than the trendline that has been witnessed over the last 10 years.

The DA documentation understates the traffic congestion that will arise if the forecast visitor numbers and population growth are achieved.

Alternate forms of transport

The understated traffic numbers appear to be based on alternate forms of transport emerging in the near future.

Whilst it is probable that such alternate forms of transport will emerge in the medium to long term, it is extremely unlikely to occur in the short-term (5 to 15 years).

On that basis, if the projected visit numbers are achieved, there will be unacceptable levels of congestion, and insufficient car parking spaces (in the vicinity of the development) in the short term.

*THERE won't be enough parking for
People visiting the City.*

Project costs.

Contingencies: the financial value of contingencies that will inevitably arise during the development of the project is a vital factor in assessing project viability.

The figures presented in the DA documentation appear to be optimistically low. There is a high risk associated with such optimism.

Escalations: the financial value of escalations that will inevitably occur during the development of the project is also a vital factor in assessing project viability.

The existing level of project development in the Coffs Coast region is at a record high.

With increasing population, and the inevitable increase in project development over the next five years (including the estimated \$2 billion cost of the highway bypass) escalation in development costs will be substantial.

The figures presented in the DA documentation have all the hallmarks of being too low.

There is a high risk associated with such optimism.

* WE DON'T NEED ~~NEW~~ COUNCIL SEATS.
FORECAST VISITOR NUMBERS. WE JUST NEED NEW COUNCILERS.

The projection of 412,000 visitors per annum by year 5 is grossly optimistic.

This figure has not been tested, and the consequential projected revenue stemming from those visitors is equally optimistic.

Benefit cost analysis.

The results of the benefit cost analysis as published in the DA documentation are unrealistic, inappropriate, and irresponsible.

It is noted that the Net Present Value (NPV) and the consequential benefit cost ratio (BCR) have been calculated using a discount rate (known in the industry as the weighted average cost of capital (WACC)) of 7%.

The associated sensitivity test is also unrealistic, inappropriate, and irresponsible.

Adopting a WACC 4% below the mean (at 3%), and 3% above the mean (at 10%) is only reasonable if the mean WACC is also reasonable.

The adopted mean Discount Rate (WACC) is seriously in error.

Given the fact that the business model (including forecast visitor numbers, forecast visitor revenue, forecast operating costs, forecast maintenance costs, forecast depreciation costs, CAPEX assumptions, and Overhead assumptions) is unproven and based on miscellaneous (unproven) predictions, the mean discount rate should be greater than 12%.

The associated sensitivity test should therefore analyse BCR's and NPV's using a low discount rate of the order of 8%, and a high discount rate of the order of 15%.