

Name:  
Address:

Date: 22nd October 2019

**ATTENTION: DIRECTOR – KEY SITES ASSESSMENTS**

**Planning and Assessment**

**Department of Planning, Industry and Environment**

**GPO Box 39**

**Sydney NSW 2001**

Dear Director,

**OBJECTION**

**State Significant Development Application No: SSD-10300**

**Coffs Harbour Cultural and Civic Space**

**I object to the Development Application and request that a Public Hearing be held.**

The reasons for my objection are as follows:

**Parking**

1. Projected population growth will accelerate vehicle movements and significantly increase parking demand in the constrained CBD.
2. DA modelling is optimistic as the projected increase is less (not more) than the trendline for the past 10 years.
3. Understated traffic volume appears based on alternate forms of transport emerging in the future, which are extremely unlikely to occur in the short-medium term (5-15 years).
4. If projected visitor numbers are achieved, there will be unacceptable levels of congestions and insufficient car parking spaces in the vicinity of the development. The public will not walk from a 400m radius of the property.

**Flooding**

5. The flood study relies on rainfall data measured over the past century. Whilst this may appear adequate, it ignores evidence that major rainfall events are increasing in frequency and intensity. The future trendline indicates the property will not be flood free. Noting the flood study notes that a PMF event has already occurred.
6. Council has an adopted climate change policy. Currently that policy predicts a sea level rise in the LGA region of 1m by 2100.  
Recent reports by the intergovernmental body are now predicting sea level increases greater than 1m by 2100.  
On that revised predictions, the marginal adequacy in the flood study will become seriously inadequate during the operational life of the proposed development.

**Location**

7. The regional Gallery has an obligation to be accessible to the population. The consequence of locating the regional Gallery and regional Library in a constrained location in the CBD is unsatisfactory and contrary to public convenience for the whole LGA which extends over a north south axis 50km. It is only convenient to the population within the Coffs Creek catchment.

8. Cultural facilities do not need to be drawn into a 400m radius to be located alongside commercial, retail, civic facilities and inner-city housing.
9. It is disappointing there is a segregation of cultural facilities and counter intuitive to the idea of a stronger, appealing cultural centre.  
The Gallery and Library components are located in a position which does not facilitate the future aggregation of a more comprehensive cultural precinct in the medium-term.  
This is particularly disappointing given the fact than an appropriate location does exist within 1km of the CBD at the intersection of major regional arterial roads.
10. Tweed Gallery is just one of many successful examples of the benefits to be gained by having a prominent Gallery located outside the CBD. Inverness Cultural precinct in Scotland (same size as Coffs Harbour) is an international example.

#### **Invigoration of CBD**

11. Council argues the proposed development will invigorate the CBD, however there is no justification for this as the same facilities (Council chambers, Gallery, Library) are within a 200m walk from the proposed site.
12. The CBD has received Special Rates from land owners since 2000, preferential development parameters, building height increases and Council fee rebates, all in order to revitalise the location.  
It is arguable these have initiatives have had any substantive effect, and possibly a detrimental result. Many owners appear reticent to modernise their buildings, choosing to rely on Special Rates to finance precinct improvements. Many buildings still carry their 1960's facades. Rents have increased, yet in excess of 25 properties are vacant.
13. Forecast visitation is not representative of new/additional visitors, rather an indication of current individual attendances principally by locals and mostly Library users. Irrespective of the figure, it does not relate to economic benefit when the visitors are from the low socio-economic band.

#### **Other issues:**

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