

PLEASE DO NOT DELETE  
MY PERSONAL INFORMATION BEFORE  
PUBLICATION OF THIS SUBMISSION

Raf Stary  
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NSW 2450

25<sup>th</sup> October 2019

**ATTENTION: DIRECTOR – KEY SITE ASSESSMENTS**

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

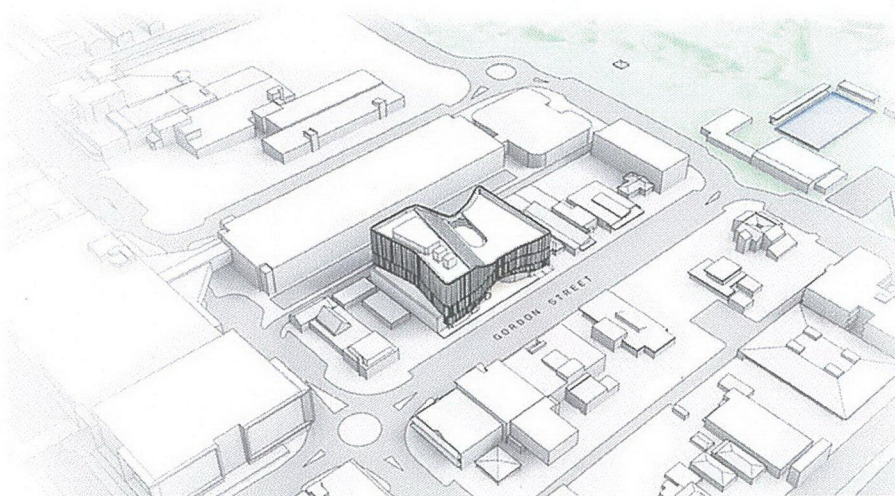
Dear Director,

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

I object to the above Development Application. I request that a pause to the decision process if ordered and that a public hearing into the decisions taken is undertaken.

The reasons for my objection are as follows:

1. The proposed Building contravenes the purpose of the Commercial B3 zone. It is in excess of the height limit (29.24m plus exhaust vents an extra 0.5m). The Coffs Harbour Local Environmental Plan (LEP) 2013 restricts height to 28m. Its bulk and stature will dominate the surrounds:



Source: CHCC -

[https://www.heartofcoffs.com.au/post/coffs\\_harbour\\_cultural\\_and\\_civic\\_space\\_august\\_8\\_decision](https://www.heartofcoffs.com.au/post/coffs_harbour_cultural_and_civic_space_august_8_decision)

2. The proposal further contravenes B3 Commercial Core Zone which states (in part)

“To provide a wide range of retail, business, office, entertainment, community and other suitable land uses that serve the needs of the local and wider community.

To encourage appropriate employment opportunities in accessible locations.

To maximise public transport patronage and encourage walking and cycling.

To ensure that the scale and nature of future development reinforces the role of the Coffs Harbour

central business district as the primary commercial, employment and retail centre in the region.

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”.

The relocation of Council offices from a nearby site adds nothing to employment in the CBD. Increasing office space in the centre of town will not improve the vitality of the CBD. There is no provision in this proposal to increase attractiveness of the CBD out of office hours. There is no provision to enhance pedestrian access or public transport access since the site is bounded by a public carpark on one side, and a busy thoroughfare on the other side. Further It does not meet the safer by design principles and guidelines as it provides a covered arcade between Riding Land and Gordon Street that jumbles territorial space, provides cover for potential criminal activity and prevents good surveillance.

The siting of this proposal does not adequately address the issues of off-street parking. There is no provision to increase parking especially disabled access to the site. Arguments are that there is existing parking within several hundred metres of the site. These are currently subscribed at busy times such as market day and holiday periods. As CHCC have an objective to increase tourism by many initiatives increased pressure on the existing facilities will occur even before the site is completed.

3. The original concept as presented to the public in 2014 included a performing arts centre WITHOUT Council offices. The performing arts centre was dropped from the design in April 2016, being replaced by office space. There was no community consultation for this major change.
4. The proposal for the Library, Art Gallery and Museum are inadequate with regard to future proofing. There is little scope for increasing the size of any of these facilities as the city grows. It is evident that the Council have failed in future proofing community facilities in the past. The museum was located to the heritage Police station after purchase in 2011, with refurbishment extending to 2014 at a cost of \$1,58K (<https://coffscoastoutlook.com.au/are-ratepayers-facing-a-loss-overall-on-sale-of-museum/>). The estimated cost of disposal only FIVE years later is \$800K, a loss of \$700K. The current proposal will not adequately display some of Coff's heritage treasures due to lack of space in this design. It is clear that in the future, all of these facilities will need to be relocated again and the space would naturally be taken by an expansion of the Council offices.



5. The current proposal is still in a concept stage and has not been rigorously costed. There is no provision for the qualification of Government grants, nor any concrete actions to limit escalation of costs. As this project is to be financed over a long period, and is of considerable estimated cost, any escalation will become a further financial burden on the ratepayers of the LGA. Financial issues for Council were manifested by an IPART order allowing for increases in rates of 25.7% over 2015-2017, and the necessity for staff redundancies over 2013-2015 as well as other numerous well documented examples.
6. The proposal was not subjected to a full Community Consultation process. This is evidenced from the exclusion of a performing arts centre and inclusion of Council offices, and that since the final design was made public, over 15,000 Coffs Harbour LGA residents have signed a petition objecting to the design and situation. An analysis of App BB (Aboriginal, Community & Stakeholder Consultation) indicates:

<b>Group</b>	<b>No Meetings</b>	<b>Percentage of Total</b>
<b>Internal Council</b>	<b>18</b>	<b>22%</b>
Library Planning	15	18%
Museum	4	5%
Gallery	3	4%
Indigenous Interests	9	11%
Cultural/Heritage	10	12%
Teaching/Youth	22	26%
General Community	2	2%
<b>Totals</b>	<b>83</b>	<b>100%</b>

It is clear that a large part of this inadequate consultation was within the council. Further, the Council are seemingly ignoring the petition requesting a review of this project. <https://coffscoastoutlook.com.au/chcc-gm-extensive-consultation-done-council-practicing-representative-democracy/> . To date over 15,000 LGA residents have signed this petition, and it is clear that the Council have taken no notice of these objections.

7. There is a residual doubt over the validity of Mr Adendorff's vote. It has been reported that there is a conflict of interest with his pecuniary interests within the CBD (<https://coffscoastoutlook.com.au/what-is-a-significant-pecuniary-interest/>). A full investigation over the validity of the vote is called for.

In the past two years I have not made any reportable political donations.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R E Stary', with a stylized flourish at the end.

R E Stary