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NSW Department of Planning
320 Pitt Street,
SYDNEY NSW 2000

State Significant Development – Coffs Harbour Cultural and Civic Space
SSD-10300

OBJECTION

The council had been the subject of strident criticism from the majority of residents and ratepayers in regard to this development, and as this criticism grew, so did the council's determination to provide the facility and, most importantly, on the Gordon Street site. Council's approach to this development, demonstrates clearly the fundamental conflict that council has, in dealing with being the developer and the regulator.

The Gordon street site fails both planning, and in the terms of a Capital Investment. The reasoning can be explained in the following:

- Site is immediately inadequate, with no room for expansion in any area of its function in a fast-growing city.
- Information supplied to Consultants/Councillors and Focus groups in the process would seem to be unreliable and unrealistic
- Consultants/Council have sought to minimize car parking needs and the Traffic affect of the project on Gordon Street immediately and in the future.
- Incomplete Capital Investment Value and breakdown. "CIV shall also be provided which includes the CIV for the components of the development which relate only to cultural, recreation and tourist uses as defined under Clause 13 of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011." The included CIV is generic and is broad in its assumptions and has not relied on any specific Quantitative costings. Does not specifically relate to the current design. The lack of financial analysis demonstrates Council is treating this project as an aspirational project rather than a business project.
- Unacceptably high density / over-development of the site,
- Design (including bulk and massing, detailing and materials, if these form part of the application)
- The proposed development is over-bearing, out-of-scale, or out of character in terms of its appearance compared with existing development in the vicinity
- Surface Reflectivity - unacceptable risk of solar reflections producing disability glare to car drivers and pedestrians

- **DCP Parking Assessment- Parking Requirements**

- CHDCP Parking Rates**

- The rates provided in Part F General Development Controls – F1.5 On-site Parking – Non-Residential of Council’s DCP uses outlines the parking requirements applicable to the Proposal.

- CHDCP Car Parking Requirements**

- Land Use Yield Parking Rate Parking Requirement
 - Library 2,775 m2 GFA
 - Subject to Parking Study
 - Gallery 948 m2 GFA
 - Museum 577 m2 GFA
 - Multi-purpose civic (Council Chambers) 283 m2 GFA
 - Public Meeting Rooms /Function Space /Community Rooms 326 m2 GFA
 - Co-working space 156 m2 GFA 1 space per 40 m2 GFA 4
 - Customer Service Area 229 m2 GFA 1 space per 40 m2 GFA 6
 - Council Offices 2,938 m2 GFA 1 space per 40 m2 GFA 74
 - **Total 84**
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- Development allows 74 Car Parks for a Development of approx. 8500m2**

Noted that the Café and Shop have been excluded from the above analysis as they were considered ancillary to the overall development indicating that the patronage for these land uses would primarily be link trips and visitors associated with the library gallery, museum, etc. As such, no parking requirement has been included for Café and Shop. (Presumption of Exemption and excluding Staff).

The Car Parking provided in the Development Plans is limited to only 74, the proponent claiming that they will retain the additional parking in the current Council Administration Building, therefore it would comply. The remote provision of car parks is not tenable in this case, as the proposed carparking nominated is depended on access within a building which is currently for sale, which would void any such arrangement. It may also be noted that this additional parking is subject to significant flooding.

No parking has been provided for Library Patrons and/or Staff 2775m2

No parking has been provided for Art Gallery Patrons and/or Staff 948m2

No Parking has been provided for Museum patrons and/or Staff 577m2

No Parking has been provided for Staff/Visitors Council Chamber 283m2

No Parking has been provided for the Public Meeting Rooms

Community Rooms for Volunteers and Visitors 326m2

No Parking for Shop and Café Staff or Patrons

Council staff have sought to minimize car parking needs for this development.

Strategies for this minimisation have been recommended as such:

Managing Car Use

Car Sharing Staff and visitors are encouraged to use a shared car to reduce the number of private cars.

Carpooling

Establish a carpooling program to help staff find someone to share in their daily drive to the Proposal.

Promoting Public Transport

Provision of Opal Cards with Credit for a period of free rides.

Council may consider subsidising Opal tickets to increase public transport use. Subject to Council implementation.

New bus services/routes Encourage bus patronage with an efficient bus network system.

Provide additional bus routes, bus stops and increase service frequencies.

Promoting Cycling and Walking

Providing End of Journey Facilities Providing EOT facilities such as showers, change rooms, lockers.

The inclusion of these strategies is clear evidence that the Parking is inadequate now and would be exponentially in the future. " ***The majority of employed persons within the Coffs Harbour Urban Area drive to work (69.7%). The data also indicated a low utilisation of public transport, that only 0.6% of commuters used bus services as their primary mode of transport in the Coffs Harbour Urban Area. It is also apparent from the available data that active transport modes are low with 1.2% of commuters cycling to work and 3.8% walking to work. It is noted that the Coffs Community Wellbeing Survey results show that the use of walking of cycling tracks has decreased over time.***"

Major concerns regarding the parking assessment include:

- a failure to consider daytime use of the Public Exhibition Areas,
- the adoption of incorrect functional areas being considered, and a failure to recognise the facility's use as conference centre and the use of the foyer areas for trade shows, community shows and the like.
- Limited vicinity parking for Staff and/or projected visitor numbers.
- Several undeveloped allotments exist in Gordon Street which will considerable add to the Parking Load requirements.
- Traffic Circulation is significant in this present and it appears that this issue is understated in the Traffic Study in terms of Local feedback.

Loading Dock

The plans made provision for a loading bay accessed directly from Gordon Street, which is in close proximity to a major roundabout in central CBD. The Loading Dock may require trucks to block Gordon Street while accessing the Loading Dock either in a forward or reverse motion. The risks posed by this configuration could be fatal to pedestrians.

All of the evidence indicates that that this development is failing to provide a Specific Cultural Centre, as was widely accepted by the community of Coffs Harbour before the inclusion of Council Administrative accommodation. The Council failed to fully engage the Community in the addition of the Council Administrative accommodation and consult the wider community, preferring the views of Project reference Groups and Industry providers, which has driven its processes and subverted genuine community consultation. 15000 people have currently signed a petition against this application. It lacks the "Planning" for the future and there is a strong case that it would be antiquated on completion.

Therefore, I would strongly request that this application not be approved.

Regards

Mark Dodd