



GOWINGS

Investing Together for a Secure Future

29 October 2019

Director
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY 2001

Dear Sir/Madam,

**RE: Proposed Cultural Civic Space: Nos. 23 -31 Gordon Street, Coffs Harbour
(Lot 123 DP 749233, Lot B DP 346105 and Lot 20 DP 758258),
Application Number: SSD 10300**

I am writing in relation to the above project to provide our qualified support.

As you would be aware, Gowing Bros Ltd is a major property owner and investor in the City and a major stakeholder committed to the successful growth and development of the City Centre.

May I say at the outset that we congratulate Council on embarking on a project for a new art gallery, library, museum and cultural space as these will contribute significantly to the cultural diversity and vibrancy of the City Centre. We fully support Council's concept of a place to gather, create and discover and the inclusion of the library, art gallery and museum and cultural spaces; great cities have these important cultural facilities within the very heart. However, we object strongly to the inclusion of the proposed café and Council administration offices within the development.

There is an abundance of nearby cafes and the City would benefit from people circulating in the area and utilising the existing cafes and restaurants that have recently been established in and near the City square.

As we understand Council will be relying on the sale of their existing administration building and vacating "Rigby House". The consequence of this will be to deliver an immediate glut of office space within the CBD and this is the last thing the CBD needs after finally getting back on its feet after decades of decline. There is currently an adequate supply of office space in the CBD as evidenced by the areas of vacant office space and limited new office space development over recent years.

Adding additional vacant office space all at once, from the vacated library, art gallery and extensive Council administration areas, to the CBD stock will undermine the growth and development of the City and Council's endeavours to create a vibrant, robust and sustainable City. In a time where governments at all levels are seeking to reduce staff levels and introduce flexible work practices (i.e. working from home, hot desking, job share etc), it would seem to be more prudent to be consolidating the office space within the existing premises being used by Council rather than expanding to new premises.



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We understand that there is considerable angst in the community over the provision of the Council administration offices within this project and we suggest an alternative to the office component would be to include a residential component in the development instead. We consider that this would have the following benefits:

- Extending the life of the City Centre beyond 9-5 work hours and thereby adding to the vibrancy of the City (noting that office space use is normally limited to 9am-5pm use);
- Providing an income source for the project through residential apartment rentals and/or sales;
- Helping to create a more sustainable and walkable City with people living in the heart of the City and reducing reliance on private vehicles and helping to reduce greenhouse gas emissions and increase the opportunity for increased public transport patronage;
- Providing a use that will be in keeping with the public interest and provide Council with a positive civic leadership role;
- Providing a catalyst for other developers to follow and help move more quickly towards a liveable City with housing in the heart of the City;
- The opportunity to provide a component of affordable housing within the City to meet a growing social need;
- Promoting mixed use development that can make the City dynamic and help create the 'Compact City' Council is promoting in its Growth Strategies;
- Increasing the City Centre population which in turn will increase the use of the City's facilities and services including the library, art gallery, museum and nearby swimming pool, Brelsford Park and other Council facilities and services;
- Avoiding creating an immediate glut of office space in the City Centre;
- Reducing the financial burden and risk of having to sell existing Council assets and paying for relocation costs; and
- Providing an opportunity to partner with a housing provider for investment.

In addition, on review of the Transport Assessment Report for the proposal, it is apparent that the likely impacts on public parking availability adjacent the development has not been adequately addressed.

While the proposal includes construction of additional basement car parking, this parking will be restricted in use to Council staff and Councillors and providing no additional capacity for visitors.

Public parking survey data included in the Parking and Transport Assessment Report shows that parking availability, particularly in the Castle Street multi-storey car park can currently exceed 85% occupancy during peak retail times.



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The Castle Street multi-storey car park is currently managed by Gowings Bros Ltd under an agreement with Coffs Harbour City Council. This car park provides the main retail and commercial parking supply for the Coffs Central Shopping Centre and the core City Centre retail area. Transfer of long and short-term parking demand from the City Centre fringe, along with the increase in parking demand generated by a successful Cultural and Civic space development will have significant impact on the capacity of public parking in the City core.

In order to mitigate the impact of the proposal on accessibility of car parking in the City Centre, the development project plan and cost plan should include;

- Review and amendment to the existing Castle Street multi-storey car park mix of time-restrictions, including the number of unrestricted car parking bays, to provide additional short to medium term car parking in the City Centre.
- Funding for construction of additional levels of public car parking in the Castle Street car park as identified in the report '*Coffs Harbour City Council Castle Street Carpark Additional Parking Deck Feasibility*'.

In summary, we support the components of the project that include the library, art gallery, museum and cultural space, but object strongly to the inclusion of the café and Council offices being part of the project. There is an alternative for the office component to be removed and replaced with a residential component that would be in keeping with the public interest and would deliver many other benefits outlined above. We have also outlined a number of actions to mitigate the impact of parking that we trust you will seriously consider.

Yours faithfully

Chris Mulcahy
Head of Property