FLOOR SPACE RATIOS

ANALYSIS FOR WOOLGOOLGA TOWN CENTRE

REV A 10-08-2022

SMITH & TZANNES

PURPOSE

TITLE	**Floor** Space Ratios
PROJECT	**Analysis** for Woolgoolga Town Centre 21_116
CLIENT	CITY OF COFFS HARBOUR
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STATUS	**AMENDMENTS MADE**

SMITH & TZANNES

1 PURPOSE

1.1 BRIEF

The purpose of the study is to undertake an analysis of the need for floor space ratio controls for the three business centres within Woolgoolga. The analysis is required to determine the most appropriate means of controlling the bulk and size of buildings in accordance with the vision and recommendations within the Woolgoolga Town Centre Masterplan adopted by the City of Coffs Harbour in 2018.

This analysis presents different options to City of Coffs Harbour for controlling the bulk and size of buildings.

1.2 STUDY AREA

The study area comprises three business centres being:

- Beach Street Village;
- River Street; and
- Solitary Islands Way.

FIGURE 1: STUDY AREAS

1.3 BACKGROUND

The Woolgoolga Town Centre Masterplan (the Masterplan), adopted by the City of Coffs Harbour in February 2018, contains a number of recommendations and actions in order to the achieve its vision, including a recommendation to remove floor space ratio controls for the Beach Street Village Precinct and to amend the floor space ratio controls for the River Street Precinct. However, the Masterplan also recommends that a detailed floor space ratio analysis be undertaken to validate such recommendations.

In 2019, City of Coffs Harbour engaged consultants, G2 Architects, to undertake a peer review of the recommendations contained within the Masterplan that relate to amendments to the City of Coffs Harbour local planning controls. This peer review determined that the existing floor space ratio controls should be removed from the three business precincts within the Woolgoolga Town Centre, as such controls would not assist in achieving the desired outcomes of the Masterplan. The peer review noted that adequate planning controls, such as density; access to natural light; and streetscape character would sufficiently control the bulk and size of buildings in keeping with the Masterplan.

Council at its Ordinary Meeting of 11 June 2020, resolved to initiate Coffs Harbour Local Environmental Plan (LEP) 2013 – Housekeeping Amendment No.3 (including Woolgoolga Town Centre Masterplan and Local Growth Management Strategy Design Excellence for Industrial Areas). One of the Amendment Items put to Council proposed to remove the floor space ratio controls from the three business precincts within the Woolgoolga Town Centre. However, at that meeting, it was resolved that Council consider a further report on amendments to the floor space ratio controls to support the intent of the Masterplan. All other items of the resolution have now been finalised and amendments to building heights and land use zoning amendments came into force 26 February 2021.

1.4 LOCAL CHARACTER

The Masterplan has been developed using ‘place based’ principles, that is, it seeks planning and development outcomes that achieve a particular vision based on how residents and visitors will experience Woolgoolga and what memories they will take away from it.

The Masterplan recognises that change is needed to address changes in population, promote renewal of older buildings that have exceeded their use and seek improvements to the built environment.

Woolgoolga is charactered by a spectacular landscape setting, the ocean and highway influences with wide reserves and carriageways.

The framework responses seek design outcomes that enhance commercial opportunities, renewal and reinforcement of the beachside character of the town centre. The future planning controls need to reinforce this.

2 WHAT IS FLOOR SPACE RATIO

2.1 THE DEFINITIONS

A floor space ratio (FSR) is the relationship of the total gross floor area of a building relative to the total site area it is built on. It indicates the intensity of the use of the site.

It is a defined term in clause 4.5(2) of *Coffs Harbour Local Environmental Plan 2013 (LEP) as follows:*

The ***floor space ratio*** of buildings on a site is the ratio of the gross floor area of all buildings within the site to the site area.

Gross floor area is defined in the dictionary of the LEP as:

gross floor area means the sum of the floor area of each floor of a building measured from the internal face of external walls, or from the internal face of walls separating the building from any other building, measured at a height of 1.4 metres above the floor, and includes—

(a) the area of a mezzanine, and

(b) habitable rooms in a basement or an attic, and

(c) any shop, auditorium, cinema, and the like, in a basement or attic,

but excludes—

(d) any area for common vertical circulation, such as lifts and stairs, and

(e) any basement—

(i) storage, and

(ii) vehicular access, loading areas, garbage and services, and

(f) plant rooms, lift towers and other areas used exclusively for mechanical services or ducting, and

(g) car parking to meet any requirements of the consent authority (including access to that car parking), and

(h) any space used for the loading or unloading of goods (including access to it), and

(i) terraces and balconies with outer walls less than 1.4 metres high, and

(j) voids above a floor at the level of a storey or storey above.

The definition of gross floor area is notable for the areas of a building that are excluded from the area calculated. The calculated area of GFA is less than the envelope area. Depending on the design, the area can vary between two buildings that look the same on the outside. As a result, gross floor area does not always provide a good indication as to the size, bulk and scale of a completed building as demonstrated in Figure 2.

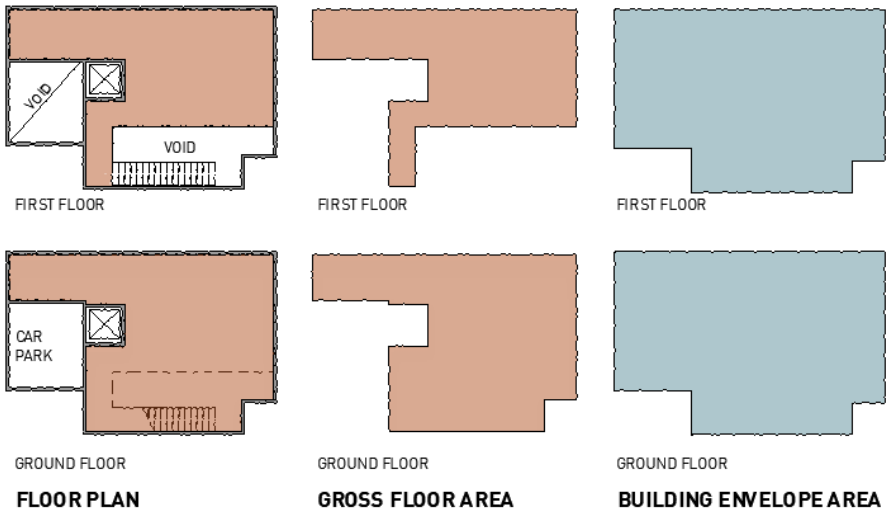

FIGURE 2: GROSS FLOOR AREA VS BUILDING ENVELOPE AREA

The area counted towards gross floor area excludes the external wall thicknesses, void of the lift, car parking, voids in the plan, and voids over the stair and entrance. In this example, the building envelope area is 66% larger than the gross floor area.

2.2 FLOOR SPACE RATIO IS NOT A BUILT FORM CONTROL

Floor space ratio can indicate the intended intensity of the land use on a particular site, in terms of how much usable floor space is contained within any development. However, it does not provide a good indicator of the final built form. On its own, it does not determine the size of the footprint or the height.

Buildings of different heights and footprints can have the same FSR.

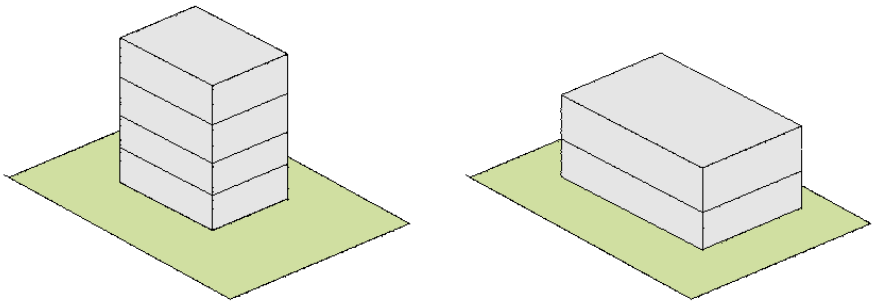

FIGURE 3: BOTH BUILDINGS HAVE SAME FSR BUT HAVE DIFFERENT SCALE, CHARACTER, SETBACKS, LANDSCAPED AREA AND SITE COVERAGE.

The exception to this is when a high FSR is combined with low height limit. For example – a FSR of 1.2:1 with an 8m height limit, will most likely result in a two storey form, however the extent of the upper level and site coverage could still vary greatly.

The disconnect between the size of a building and the FSR is greatest where the building footprint is small, as a greater proportion of the built form is likely to contain area excluded from the GFA calculation.

Typically, DCP's apply fixed setbacks to a site. This results in buildings being located fixed distances from boundaries or each other. Most sites in the Woolgoolga town centre vary greatly from each other, both in terms of area and shape.

When the shape and area of a site change, the area left over after the setbacks are applied will change. A large site will have a larger building area (as a proportion of

site area) than a smaller site. As illustrated in Figure 4, this results in a different FSR being achieved between sites, even though the buildings can look the same and have the same relationship to adjacent development.

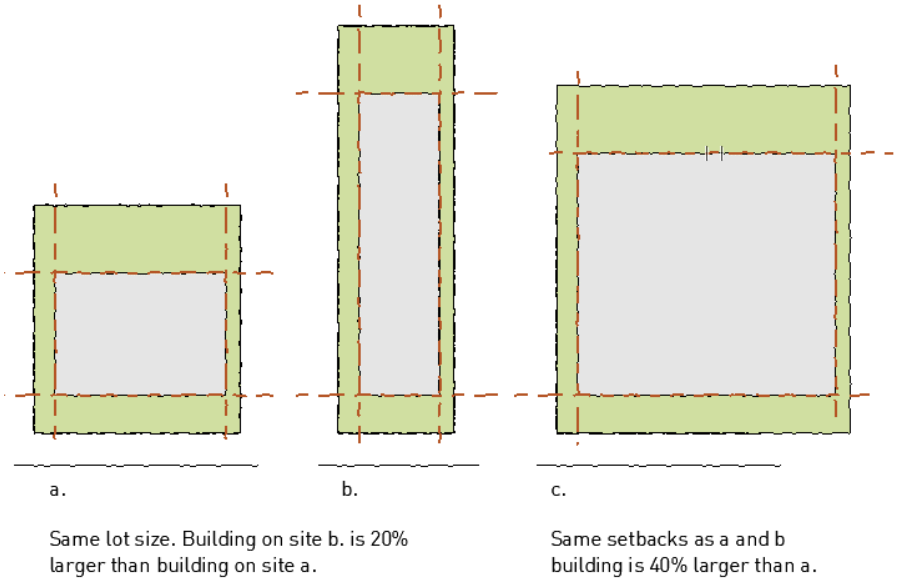

FIGURE 4: IMPACT OF FIXED SETBACKS AND SITE AREA AND PROPORTION ON FSR

What floor space ratio can do

By controlling the amount of floor space on a site – a FSR can control the intensity of use. This may enable mitigation of impacts such as traffic generation for commercial uses in a CBD or enterprise parks. Typically, the lettable area of an office building is similar to the GFA, and there is usually a connection between the lettable area of a commercial use and the number of people that will occupy the space.

On large sites where there are limited built form or amenity controls, an FSR can ensure a building envelope is not 'filled', to enable a greater level of articulation in the built form. In these instances, the FSR needs to be carefully calibrated, taking into account setbacks, heights, desired character, landscape controls and land use. However, a landscaped area control or site coverage control is more effective in reducing the building footprint beyond the setback lines.

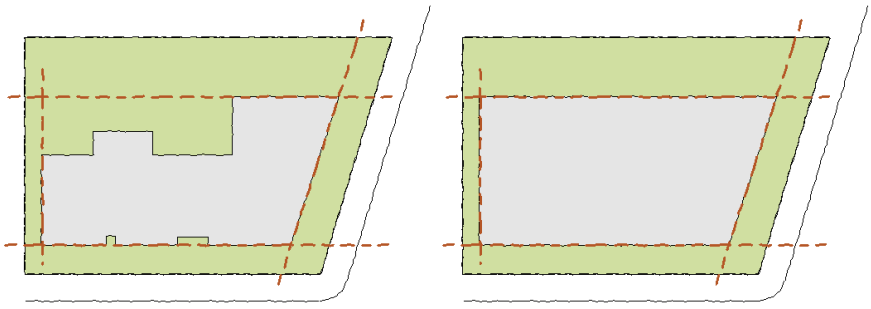

FIGURE 5: BUILDING FOOTPRINTS AND SETBACK CONTROLS

A low FSR can compensate for limited development controls on a site. By providing a constraint to development, it reduces reliance on amenity and setback controls to get a good outcome. However, it is not as effective as controls with a particular purpose. For example, a site with a low FSR is likely to have less overshadowing impacts – but a control that specifies solar access requirements is more effective in achieving this goal. FSR can be a useful tool in limiting the bulk and scale of development in areas where the development sites are large, and the planning controls are more generic or where there are limited built form controls.

FSR can provide a very crude guide for future developers as to the likely development potential of a site to assist in valuations. However, this relies on carefully calibrated controls. In many areas across NSW, other constraints may restrict attainment of the maximum FSR. At its worst, inappropriate FSR controls can at the extreme, inflate the value of land and provide unrealistic expectations of a sites development potential or could result in a site being underutilised – if the FSR for a particular lot is set too low.

FSR controls need to be carefully calibrated to consider the applicable controls on the land and how they interact with sites of different dimensions.

What floor space ratio cannot do

FSR cannot determine the style, shape or footprint of a building. This is controlled by setback and height controls.

FSR cannot determine the character of an area unless all block sizes are similar – for reasons outlined previously.

FSR cannot determine the apartment size. Two buildings of the same size could have 12 small apartments (12 x 50m^2 = 600m^2) or 6 large apartments (6 x 100m^2 = 600m^2) as illustrated in Figure 6.

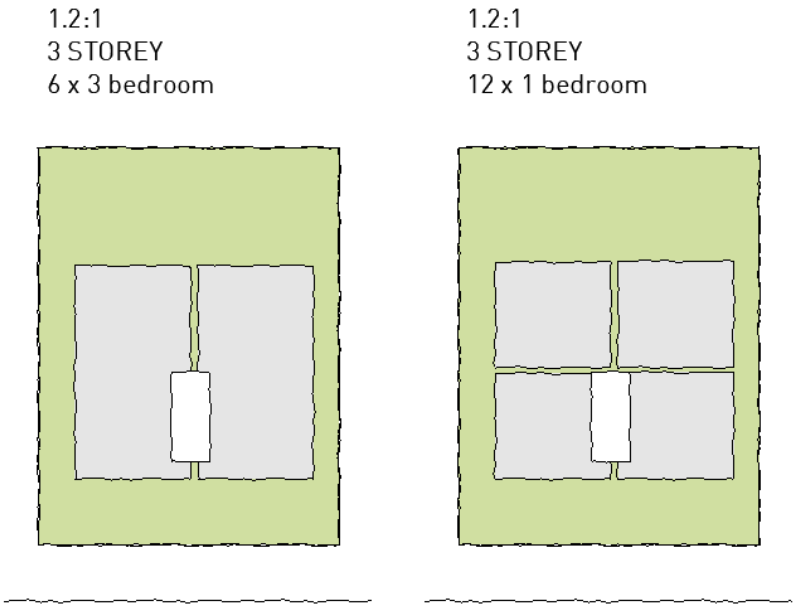

FIGURE 6: SAME SIZE BUILDING, DIFFERENT NUMBER AND SIZE OF APARTMENTS

FSR cannot determine how much area of the site can be used for landscaping, unless buildings are single storey. This is best achieved using landscaped area controls.

2.3 FSR IS AN INTENSITY OF LAND USE CONTROL

FSR controls are good at controlling the intensity of land use over larger areas and are useful on single use sites where there is some certainty to the land use.

FSR controls can also be used to deliver a mix of uses with guidance for minimum or maximum floor areas for each use. For example, in a town centre area you may want to ensure a certain commercial intensity (particularly where the market may favour residential uses). A base FSR of 0.6:1 of commercial uses could achieve the required commercial use at ground level.

In residential areas, the use of FSR to determine population density is a poor measure, as there is significant variability in dwelling sizes and the density of dwelling occupation.

3 SOLITARY ISLANDS WAY PRECINCT

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3.1 EXISTING CONTROLS

The Solitary Islands Way Precinct comprises the land within Zone B6 - Enterprise Corridor. Zone B6 permits a wide range of land uses, however primarily it is to reinforce employment land and provide for large format commercial and light industrial uses that will service the Woolgoolga and Northern Beaches area.

Coffs Harbour LEP 2013 currently has a maximum height of building of 8.5m and an FSR of 0.5:1.

Although residential uses are currently permitted, they are not encouraged through the objectives of the zone.

3.2 PROPOSED CHARACTER

This precinct is proposed to be an enterprise corridor that will serve the sub-regional catchment. These proposed uses will be large format commercial businesses light industrial activities and specialised retail premises. Existing uses consist of a supermarket, motel and service station. The Masterplan encourages further commercial uses to the area.

The built form will generally consist of single storey buildings. Often parking will be provided at ground level. To activate the street, glazed shopfronts are encouraged at street level with awnings providing a connected and covered public domain. Offices associated with the ground floor uses or other commercial uses could be located at the first floor.

Larger format development may have basement car parking in order to maximise the floor area available.

3.3 OPTIONS FOR DEVELOPMENT CONTROL

The primary focus for development control is:

- Street presentation - providing a strong relationship to the street - including awnings and footpaths and an enhanced pedestrian experience, and to ensure development provides an attractive gateway to Woolgoolga that builds on the established identity for the area.

- Amenity to adjacent dwellings - provision of a landscape buffer between proposed commercial development and adjacent residential zoned land.

Coffs Harbour Development Control Plan (DCP) 2015 should facilitate development that defines the road corridor. Parking should be located to the side or below the street facing development. Continuous awnings should provide a retail character to the street.

Rear boundary setbacks to the eastern side of Solitary Islands Way should provide a minimum depth of 6m to minimise bulk and scale impacts on adjacent development. This area should be landscaped with large tree plantings (1 large tree per 70m^2) and understorey planting.

Setback controls to residential properties on the western side of Solitary Islands Way should have a minimum landscaped strip of 3m (including to laneways) and contain 1 medium tree per 70m^2. A successful outcome for the precinct will be created if the corridor is not visually dominated by car parking when travelling down Solitary Islands Way.

Side setbacks for commercial uses are not necessary.

Windows to residential uses and tourist and visitor accommodation should have a setback of 3m from side boundaries.

3.4 SAMPLE DEVELOPMENT AND FSR TESTING

The following sets out the format of a likely development in the precinct.

A wide variety of commercial uses are available. The location of parking, on grade vs basement, and the site dimensions will greatly influence the building footprint.

Unless it is desired to limit commercial development intensity, a floor space ratio is not considered to be a necessary development control. Any FSR control is likely to either overestimate the development capacity or constrain development potential – should basement parking be commercially viable.

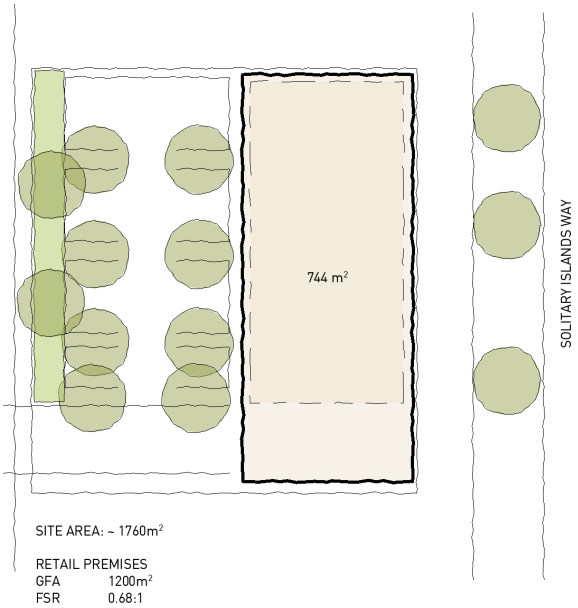

FIGURE 7: WESTERN SIDE OF SOLITARY ISLANDS WAY. REAR LANE ACCESS ALLOWS PARKING FROM REAR TO MAXIMISE FRONTAGE TO SOLITARY ISLANDS WAY

FIGURE 8: EASTERN SIDE SOLITARY ISLANDS WAY. THE TWO EXAMPLES ABOVE SHOW HOW ON THE SAME SITE, A DIFFERENT FSR CAN BE ACHIEVED – SIMPLY BY LOCATING CAR PARKING BELOW GROUND

Testing on selected sites demonstrates that viable floor space ratios achievable can range from 0.3:1 – 1.2:1

3.5 RECOMMENDATIONS

Coffs Harbour DCP 2015 should strengthen the focus on street facing interface for new development and provide controls for landscaping and tree planting along the residential interface.

FSR controls are not recommended. Assigning an appropriate FSR is challenging given the wide variety of potential uses and site dimensions. There are no constraints to the intensity of commercial uses and the resultant traffic management and car parking can be managed on site and within the exiting road network.

4 RIVER STREET PRECINCT

FIGURE 9: RIVER STREET PRECINCT

4.1 EXISTING CONTROLS

The River Street precinct comprises land within Zone B4 – Mixed Use. Zone B4 permits a wide range of land uses, however primarily it is to reinforce retail, commercial and residential uses. Unlike mixed use development in the Beach Street Village Precinct, the retail offerings are intended to be smaller and service the local neighbourhood.

Coffs Harbour LEP 2013 currently has a maximum height of building of 11m and an FSR of 1:1.

4.2 PROPOSED CHARACTER

River Street is a busy commercial high street offering a wide variety of essential services, commercial activity and food/ beverage options supporting the local needs of Woolgoolga residents and businesses.

The desired future character of River Street is a traditional commercial high street. This contrasts with the Beach Street Village that has evolved to capture the tourism market. River Street offers a wide variety of essential commercial and community services that support residents and local businesses daily, service and professional needs. New 3-storey mixed use buildings with retail, commercial office space and residential apartments generate street activity day and night.

Anchored by the Seaview Tavern at its northern end and the Guru Nanak Sikh Temple to the south, new streetscape improvements propose to revitalise River Street's commercial function and visual appeal. There is life in the street supported by an emerging range of food and beverage options including street cafes, takeaways and restaurants that serve a growing workforce and Woolgoolga locals.

Built form should consider existing commercial uses and provide quality mixed use buildings that activate the commercial and retail business, café and dining with commercial office space or residential apartments above.

4.3 OPTIONS FOR DEVELOPMENT CONTROL

New development should be primarily focused on providing street activation in the form of retail uses at ground level.

There is a significant variety in block sizes and the precinct has very challenging topography with the ground falling steeply away from River Street.

Behind and above the retail uses there is significant potential for residential accommodation – particularly in the form of residential flat buildings or multi-dwelling housing. The height limit encourages a 3 storey form and upper levels will obtain long distance views to the ocean and hinterland.

At 3 storeys in height, mixed use development containing residential accommodation would be subject to *State Environmental Planning Policy No.65 Design Quality of Residential Apartment Development* if it contains more than 4 dwellings. The Apartment Design Guide would apply to such development. The Apartment Design Guide contains amenity related design criteria that requires a minimum separation between apartments, solar access cross ventilation and deep soil planting.

Development controls in Coffs Harbour DCP 2015 should ensure similar amenity controls apply to development that is only 2 storeys in height (or contains less than 4 apartments) – to ensure similar amenity is attained.

New development should be built to the side boundaries for the first 18m from the River Street frontage to reinforce the street wall. Beyond this, a setback of 3m should be provided to side boundaries. If apartments are orientated towards the side boundary the Apartment Design Guide would require a 6m setback. It should be encouraged that the apartment layouts do not look across side boundaries but rather look to the front or rear of a site – a 3m side setback supports this.

A 6m setback at rear boundaries ensures that landscaping is provided along critical interfaces. This setback should contain deep soil planting. Deep soil landscape controls similar to those in the Apartment Design Guide should be provided in Coffs Harbour DCP 2015 (minimum 7% of lot area). The DCP should also consider an open space control (this would include the deep soil area and any landscape over structures for example, that are over a basement). A minimum area equal to 25% of the site area would be appropriate based on testing.

New development on the western side of the precinct that has a frontage to Solitary Islands Way should have a 6m landscaped setback. New dwellings should align and orientate towards Solitary Islands Way to enhance the interface to this street.

Basement car parking should not be visible from the public domain. This is particularly important where a basement car park, located under a River Street facing development, could be exposed as above ground parking from Solitary Islands Way due to the change in level across the land.

4.4 SAMPLE DEVELOPMENT AND FSR TESTING

The following sets out the format of a likely development in the area.

There is a wide variety of lot size and dimensions. Most of the lots have a significant cross fall making development complex and management of car parking challenging.

The current FSR of 1:1 underestimates the development potential available on the land. Testing on a variety of lots suggests FSR of between 1.1 – 1.5:1 could be supported within the 3 storey height limit – dependant on the extent of ground floor commercial space and lot dimensions. Corner sites have a particular advantage as the two frontages often result in a larger FSR being attained.

Space between residential uses can be used for communal open space and contribute to the 'tropical landscape character' desired in the character statement.

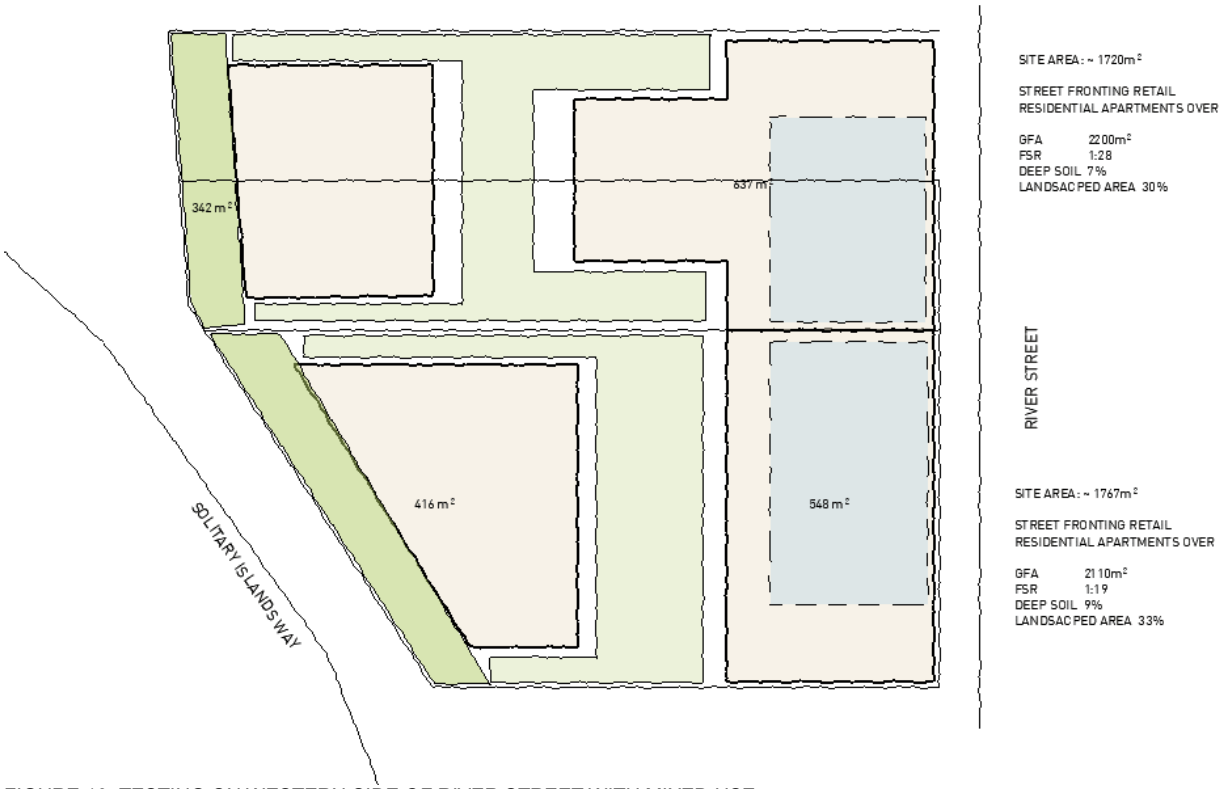

FIGURE 10: TESTING ON WESTERN SIDE OF RIVER STREET WITH MIXED USE DEVELOPMENT

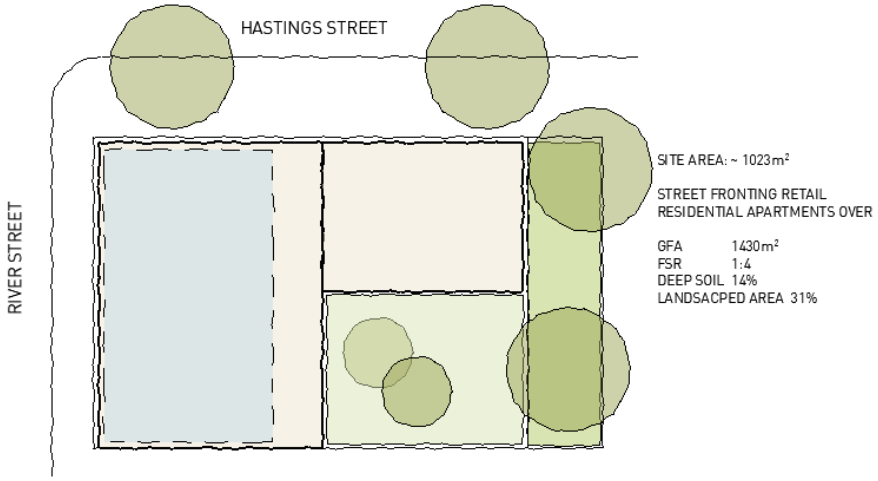

FIGURE 11: TESTING ON EASTERN SIDE OF RIVER STREET WITH MIXED USE DEVELOPEMNT ON CORNER SITE

4.5 RECOMMENDATIONS

Floor space ratio controls should be removed from Coffs Harbour LEP 2013. The current FSR is a constraint on achieving the outcomes identified in the Woolgoolga Town Centre Masterplan. The variety of densities achievable across the different lots in the precinct will vary – dependant on lot dimensions and the extent of ground floor retail.

It is important that development controls:

- Require all new development to build to side boundaries for development with a frontage to River Street to reinforce an urban street character;
- Open Space / Landscaped area controls of 25% should be provided to encourage a 'tropical landscaped character' within the site and landscaped courtyards;
- A 6m deep soil landscaped setback should be provided along Solitary Islands Way and new development should orientate towards the street to avoid it looking like the 'back of the shops';
- Living areas, private open space and 30% of communal open space should receive 2hrs solar access in mid-winter;
- Overshadowing of neighbouring properties is minimised in mid-winter; and
- Where an adjacent site is undeveloped, new development should consider potential impacts on hypothetical development on this land.

5 BEACH STREET VILLAGE PRECINCT

FIGURE 12: BEACH STREET VILLAGE PRECINCT

5.1 EXISTING CONTROLS

The Beach Street Village Precinct comprises land within Zone B2 – Local Centre. Zone B2 permits a wide range of land uses, however primarily it is to reinforce retail, commercial and provide employment and tourism uses to support the beach side location. Residential uses are permitted.

Coffs Harbour LEP 2013 currently has a maximum height of building of 11m generally throughout the precinct and 15.5m on key corner sites. An FSR of 1:1 applies across Precinct.

5.2 PROPOSED CHARACTER

The Beach Street Village precinct will enjoy a regional profile as a place for business and a vibrant centre offering convenient access to a wide range of services and shopping. The growing reputation as a preferred destination for visitors, drives local economic growth and revitalises the quality of our buildings and public spaces.

The streets, open spaces and urban places offer something for everybody - culture, colour, nature, activity and connection. The relaxed outdoor lifestyle is intended to be expressed through the character and design quality of the buildings and public realm.

Key outcomes are to build upon the existing commercial activity and deliver a compact mixed use village that maintains a distinctive coastal village character.

Residential land uses will cater for both permanent residents, short-term tourist and visitor accommodation.

5.3 OPTIONS FOR DEVELOPMENT CONTROL

The scale of development in the precinct will be highly dependent on how development sites amalgamate. The ability to provide mixed use development to

align with the intention of the vision for the precinct will most likely require site amalgamation.

New development should be primarily focused on providing street activation in the form of retail uses at ground level. Coffs Harbour DCP 2015 should provide further detail with respect to the desired character, street activation and the ground floor uses.

Parking should generally be accessible from the rear laneways. Redevelopment of some of the smaller lots along Beach Street could be encouraged by a reduction in parking requirements – related to what is capable of being accommodated on the small lot size.

Above the ground floor retail uses there is significant potential for residential and tourist and visitor accommodation.

At 3 storeys or more in height, mixed use development containing residential accommodation would be subject to *State Environmental Planning Policy No.65 (Design Quality of Residential Apartment Development)* if it contains more than 4 dwellings. The Apartment Design Guide would apply to such development. The Apartment Design Guide contains amenity related design criteria that requires a minimum separation between apartments, solar access cross ventilation and deep soil planting.

New development should be built to the side boundaries for the first 18m from the street frontage to reinforce the street wall. Further side boundary setbacks are not considered necessary and will be dependent on configuration of the built form, amenity achieved (controlled by Apartment Design Guide design criteria) and impact on adjacent development. This will also establish a different character to the River Street Precinct. Coffs Harbour DCP 2015 should contain a clause with respect to overshadowing impacts on adjoining sites:

- Overshadowing of neighbouring properties is minimised in mid-winter;
- Living areas, private open space and 30% of communal open space should receive 2hrs solar access in mid-winter (or where less than this not reduce by more than 20%); and
- Where an adjacent site is undeveloped, new development should consider potential impacts on hypothetical development on this land.

The key sites with a 15.5m height limit will need to have the bulk and scale carefully managed. The intention of the Woolgoolga Town Centre Masterplan was not for the entire site to be built to the full 15.5m. The additional height should still result in a built form that links to the lower scale development on adjoining properties. Where these sites have a close relationship to low density residential properties (i.e. dwellings in Wharf Street), the setback of the upper levels should be specified in Coffs Harbour DCP 2015 .

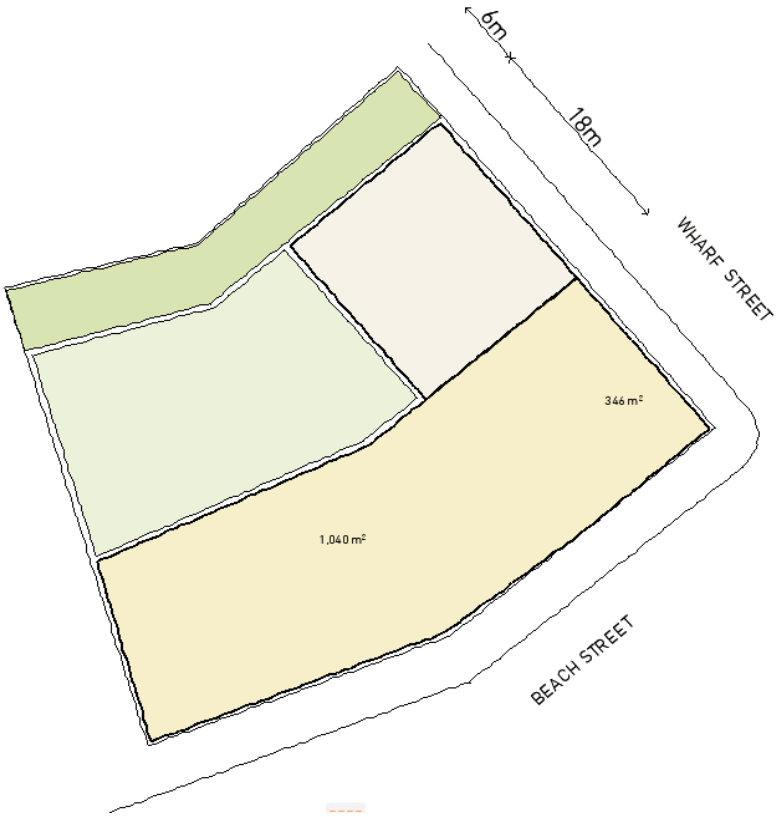

FIGURE 13: INCREASED SETBACK TO 15.5M HEIGHT WHERE ADJACENT LOWER DENSITY ZONED LAND

A 6m setback at rear boundaries ensures that landscaping is provided along critical interfaces.

5.4 SAMPLE DEVELOPMENT AND FSR TESTING

The following sets out the format of a likely development in the area.

There is a wide variety of lot size and dimensions. Except for development along the southern side of Market Street – there is no typical development site in the precinct.

The current FSR of 1:1 underestimates the development potential available on the land. Testing on a variety of lots suggests FSR of between 1.4 – 1.8:1 could be supported within the 3 storey height limit – dependant on the extent of ground floor commercial space and lot dimensions. Lots with the 5 storey height limit could achieve 1.5 – 1.9:1 FSR.

Space between residential uses can be used for communal open space and contribute to the 'tropical landscape character' desired in the character statement.

Development to the south of Market Street (Figure 14) is likely to provide buildings parallel to the street frontages – with one building facing Market Street that contains retail at ground level, and a second building with a frontage to the Laneway – with residential uses at ground level. This building should be setback from the laneway and provide an active frontage / building entry to the lane. The lane could be repaved as a shared zone. Car parking entrances should be from the secondary street frontage to enhance the active street front on Market Street.

This pattern could then be replicated along the whole street and carried out incrementally over time, with each development having minimal impact on

subsequent development. Coffs Harbour DCP 2015 controls would be needed to confirm setbacks to the laneway.

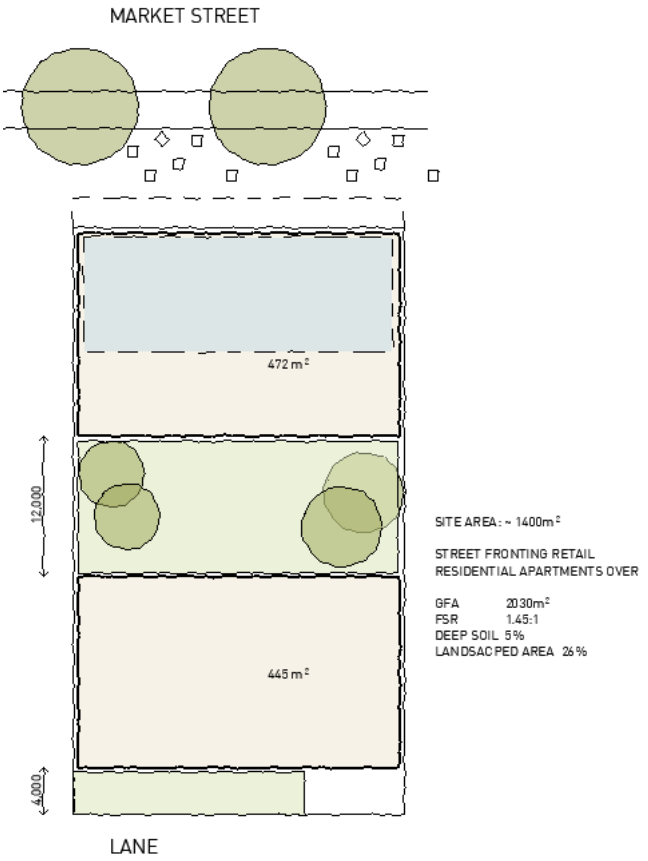

FIGURE 14: SOUTH OF MARKET STREET

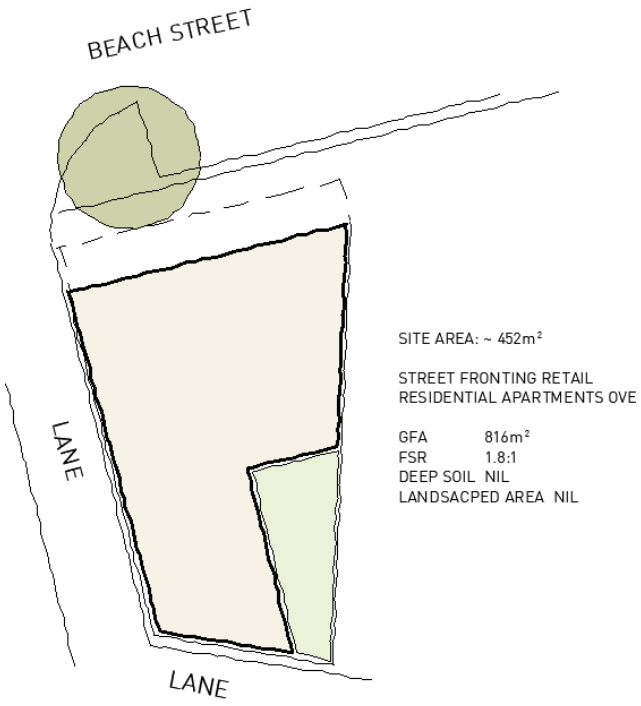

FIGURE 15: BEACH STREET SHOPFRONTS

For development with a frontage to Beach Street, each lot is a different shape and size and final amalgamation patterns are not known. Development should present to the street with a consistent parapet height and alignment. Behind that, the amenity of the interior layouts will determine the shape of the built form.

Where key sites have a 15.5m storey height control, the increased height component should shift towards the Beach Street frontage. Other street frontages should allow for a step in the upper levels so that the street wall remains at 3 storeys for consistency with adjacent development. Appropriate built form controls would need to be provided within Coffs Harbour DCP 2015.

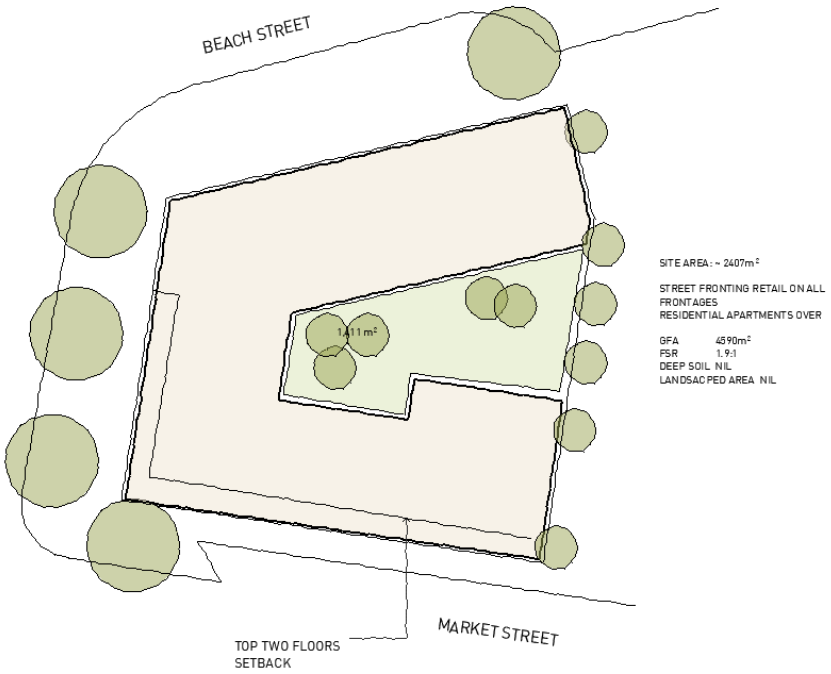

FIGURE 16: BEACH STREET FRONTED SITE WITH 15.5M STOREY HEIGHT LIMIT

5.5 RECOMMENDATIONS

Floor space ratio controls should be removed from Coffs Harbour LEP 2013. The current FSR is a constraint on achieving the outcomes identified in the Woolgoolga Town Centre Masterplan.

The variety of densities achievable across the different lots in the precinct will vary – dependant on lot dimensions and the extent of ground floor retail.

Where FSR controls are removed, they need to be supported by robust built form controls in Coffs Harbour DCP2015 that achieve the following:

- Shape the built form to ensure the desired response to the streetscape is provided (street wall heights, active street frontage, building orientation);
- Resolve visual impacts from built form at interfaces with building of different heights (e.g. setback at zone boundaries);
- Controls that shape the space between the buildings for privacy, landscape and amenity; and
- Controls that ensure a minimum standard of amenity for internal spaces.

6 OVERALL RECOMMENDATIONS

A floor space ratio development standard is a very blunt control on development that seeks to limit (or manage) the floor space of future development on a particular land use.

Analysis of the three business centres in Woolgoolga that contain an FSR standard in Coffs Harbour LEP 2013 suggests that the current FSR controls that apply to the land, act as a significant constraint to future development and achievement of the Masterplan's vision.

The wide variety in the area and proportion of lots within each of the three business zones, including the variety of permissible land uses, make the task of calculating an FSR that is a true reflection of an appropriate development potential challenging.

Within these three precincts, there are no particular constraints to development that require the floor space of any particular use to be limited.

It is recommended that the FSR development standards be removed from Coffs Harbour LEP 2013 for the three business zones.

An FSR control alone does not in itself guarantee a good built form outcome. FSR controls provide a poor method of limiting the scale of development – particularly on small development sites.

A robust range of DCP controls provide a more efficient and effective policy tool than an FSR control. DCP controls such as: street wall heights, setbacks, landscaped area, amenity controls and those recommended above in this report, have a direct relationship to physical outcomes and characteristics that need to be demonstrated in any new development proposal. DCP controls also provide greater flexibility in their application, (s4.15(3A) EP&A Act) – allowing for different site configurations and uses on the land.

Removing FSR controls without robust DCP controls is not recommended. This would allow for unrestrained development and likely result in an overdevelopment of land that could create unreasonable impacts on adjacent land, or favour increased development on the sites to develop first and unreasonable constrain later development.