

Submission – Objection

State Significant Development

Mixed-Use Development – 4–8 Bells Boulevard, Kingscliff

Submitter: Paul Holtom
Kingscliff NSW

1. Introduction

I am a resident of Kingscliff living approximately 200 metres from the proposed development site at 4–8 Bells Boulevard. I lodge this submission objecting to the proposal in its current form.

Key Concerns

- Non-compliance with established height controls.
- Traffic and cumulative infrastructure impacts.
- Parking spillover and safety.
- Bulk and incompatibility with local coastal character.
- Lack of demonstrated economic need for additional commercial floor space.
- Inconsistency with applicable strategic planning objectives.

2. Statutory Considerations

Under Section 4.15 of the Environmental Planning and Assessment Act 1979, the consent authority must consider environmental planning instruments, likely impacts, site suitability, submissions made, and the public interest.

Relevant planning instruments include the Tweed Local Environmental Plan 2014 and the North Coast Regional Plan 2041.

3. Height and Built Form

The proposal seeks development up to approximately five storeys (~18 metres), exceeding prevailing local height controls. Height controls exist to maintain coastal character, protect amenity, and ensure orderly development. A site-specific uplift risks undermining planning integrity and setting undesirable precedent.

4. Commercial Floor Space – Lack of Demonstrated Need

The proposal includes approximately 1,500m² of additional retail/commercial floor space. There is no publicly demonstrated evidence of unmet demand within the Kingscliff/Salt precinct. Observable

vacancies suggest existing supply has not been fully absorbed.

Strategic planning principles require commercial development to respond to demonstrated demand and contribute to sustainable economic growth. Introducing additional retail supply without robust economic justification risks increasing vacancy, undermining existing businesses, and creating economic inefficiency.

5. Traffic and Infrastructure Capacity

The addition of approximately 70 dwellings plus retail floor space will materially increase vehicle movements within an already constrained coastal road network. Cumulative impacts must be assessed holistically.

6. Coastal Character and Public Interest

Kingscliff is defined by low-rise, human-scale coastal character. The proposed scale introduces urban intensity inconsistent with established planning intent. The public interest is not served by overriding planning controls without clear strategic justification.

7. Requested Determination

- Refuse the proposal in its current form; or
- Require substantial reduction in height and bulk;
- Require an independent economic impact assessment demonstrating genuine commercial need;
- Ensure cumulative traffic impacts are properly addressed prior to any approval.

Sincerely,

Paul Holtom
Kingscliff NSW