

SSD47105958 Uniting Kingscliff Development at 24A Kingscliff Street, Kingscliff NSW 2487
Lodged by: Helen Edwards-Davis, 35 Lorien Way, Kingscliff NSW 2487

I wish to lodge the following objections and comments, regarding the plans for a replacement Aged Care facility, and a Seniors Living estate, proposed by Uniting Kingscliff. My objections concern impacts on my own property, impacts on the immediate surrounding area, and impacts on the township as a whole.

This development has been in process for quite some time. As a normal person, of average intelligence, I feel a little overwhelmed by the sheer volume of information, much of it presented in very technical terms. Uniting Kingscliff have massive resources, and have employed numerous consultants to present their case, which they have developed over months. I have just four weeks to make my submission in response to this...it is daunting, to be sure, but I have done my best to give you the facts from a Kingscliff resident's point of view.

Throughout this document I refer to Uniting Kingscliff as "The developer" or "UK".

For reference, I live at 35 Lorien way, directly beside and south of proposed building A.

Firstly, it would appear that many of the objectives outlined in chapter 4 of the Planning Department's Senior Housing Design guide have not been met, particularly in relation to the recognition of elements of the location's character, generous setbacks, and preservation of reasonable neighbourhood amenity,

Whilst I welcome the addition of a new aged care facility, and new housing for seniors, the manner in which UK has chosen to deliver it in Kingscliff does not fit in with the amenity of our town. With 199 residences in multi storey buildings squashed into a flood prone block of land completely surrounded by buildings of one or two storeys, the complex simply does not fit the nature and character of the area. There are issues with flood, traffic, noise, light pollution, privacy, stress on infrastructure, access, amenity and over development. Additionally, it is disappointing to read that the development will deliver only eight extra aged care places..up to 120, from 112.

I think that Kingscliff deserves better.

2 APPENDIX A: 3D MODELS SUPPLIED BY PLUS ARCHITECTURE



Image taken from Appendix S, page 107.

We know that UK is capable of delivering sensible and suitable developments: the village they built in Yamba is testament to this....a series of modest villas set within a residential street, with one apartment building that has direct access to a major road. (Not pictured)



Form and function.

Uniting Yamba's overall design vision is for retirement living that's in harmony with the beautiful tropical location.

Finishes and furnishings throughout the entry and communal spaces are specifically chosen to convey the feeling of arriving at a laid-back holiday resort with an open and expansive coastal outlook.

Exterior materials are deliberately lighter in colour and texture than traditional brick, to complement the natural environment.

And landscaping of palms, frangipanis, lemon-scented myrtles and jacarandas create a tropical oasis of lush colours and shade.

Image taken from Uniting Yamba's sales brochure

Their brochure for the ILU's in Yamba states:

“Uniting Yamba’s overall design vision is for retirement living that is in harmony with the beautiful tropical location”

I ASK THAT KINGSCLIFF BE TREATED WITH THE SAME RESPECT.

Here are my objections in detail.

PRIVACY

I **OBJECT** to the proposed development on the grounds that the development as a whole is a gross invasion of neighbours' privacy, and also on the grounds that building A does not in any way respect the privacy of the residents in 35 and 37 Lorient Way. I live in number 35, which is immediately adjacent to the south side of Building A.

UK have failed to address point 5 of the SEAR document: environmental amenity.

Part 5 states

“Assess amenity impacts on the surrounding locality including lighting impacts, reflectivity, solar access, visual privacy, visual amenity loss, view sharing, overshadowing, and wind impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.”

In the minutes of the meeting UK had with the State Design Review Panel, it is stated on page 61 of appendix C, point BG008 that the SDRP recommended that buildings should have single-loaded corridors where feasible. UK's response to this was

“We have applied a single loaded corridor approach to building A where this responds also to the “overlooking” concerns of the southern neighbours adjacent to the site”.

This is further reinforced by a statement made on page 62, in addressing a specific privacy concern by residents. The response at point A002:

“A single loaded corridor outcome proposed. Only access way corridor facing south, and all private balconies to the apartments face north.”

Despite making this undertaking to the State Design Review Panel, **ALL the plan diagrams show that building A is in fact a double loaded corridor, and there WILL be balconies directly overlooking my home, into my living room, kitchen, and dining room. In addition, the building is set back only 5 metres, not the 6 metres required for 2 storey buildings on R2 (low density) zoned land, and the minimum required as noted on page 36 of the Planning Department's Apartment Design Guide.**



Plan submitted for block A

Furthermore, the Artists impression appearing on page 75 of the EIS (pictured below) seems to reinforce the perception that building A is a Single loaded corridor building.

Environmental Impact Statement
Seniors Housing, Uniting Kingscliff
The Uniting Church in Australia Property Trust (NSW) for Uniting (NSW.ACT)
www.planitconsulting.com.au



Figure 3-2: 3D View of Building A (Source: Plus Architecture)

I have been advised that the Planning department takes the findings of the SDRP quite seriously, and uses their recommendations to help determine outcomes. It seems that at best, UK has made a serious mistake

in advising the panel as to the make-up of building A, or, at the very worst, has sought to deceive. I sincerely hope it is the former, but even so, they have had ample time to correct an error of this magnitude.

So, here I am, looking at the prospect of a two storey building with sixteen ILU's built closer to the boundary than permitted, with balconies looking directly down into my side courtyard, and habitable living spaces. Our neighbours at number 37 have an even worse situation, being overlooked by building A at the side of their house where they have a work-from-home office, and also at the rear, by building B where their courtyard and living areas, as well as their bedroom are located.

I STRONGLY OBJECT to the design of building A, and the way that it impinges on our privacy. I also object to the way the building has been presented to the SDRP, and I take a dim view of the use of misleading artists impressions. Residents did make a proposal to UK to split the building into two separate buildings, with the driveway located in the middle, so that balconies to units overlook their own driveway. No response was given.

In terms of privacy in general, because all the buildings have been planned with double loaded corridors, almost all neighbours on the Drift Court and Lorien Way perimeters will be overlooked by balconies or windows on at least two floors, which seems to me to be unnecessary, and a poor design outcome, that ignores a multitude of guidelines.

FLOOD AND STORMWATER

I OBJECT to the development proposal on the grounds that the impact of flood and Stormwater has not been properly addressed, and also that development upon flood prone land is supposed to have been halted for the moment. I believe UK has failed to address point 7 in the SEAR document adequately.

UK propose to fill in a detention basin at the southern end of the site. This basin has been a valuable collection point for water that runs off the northern end of UK's land, filtering through the undeveloped soil reaching the basin whenever we have a prolonged period of heavy rain. In 2022, prolonged rain combined with a very high tide caused levels of flooding not seen in living memory for Kingscliff. Had it not been for this basin, the current aged care facility may well have been inundated.



The basin, after heavy rainfall in 2012

I have lived in Kingscliff, for almost 15 years, and I have regularly seen this basin fill after prolonged heavy rain.

It appears from the plans that UK propose to fill this basin to achieve a new elevated ground level of 3.8 metres, putting it at the current required height above sea level.

What the proposal fails to make clear is that all the properties on Beach Street, Lorient Way, and Blue Jay Circuit have been built at a height of 3.3 metres above sea level, which was in compliance with council requirements at the time.

I am very concerned that at half a metre above the surrounding homes, coupled with a vast area of hard surfaces, this proposal has the potential to significantly impact homeowners on the perimeter. In effect, if there is no detention basin to cope with flood, then the water has to go somewhere else...and that is likely to be on neighbouring properties.

A one-way valve has, or will be fitted to the outlet pipe from the basin, to prevent a similar situation to the floods of 2022 when tidal forces combined with rain had a catastrophic flood impact. What this does, is stop any water travelling into the basin...and again, that water will need to go elsewhere...most likely affecting the surrounding streets.

With regard to Stormwater, UK has proposed the installation of several underground tanks to collect the water, then pass it through a complex array of pipes to reach the councils drainage system.

I am very concerned that these tanks and pipes will be inadequate as time passes, and climate change takes hold as it inevitably will. They have tested to the 1 in 100 event, but as global warming takes effect, this is likely to be inadequate, in terms of the lifetime of the buildings. There is also a risk of failure..I can imagine that they would be difficult to repair or replace. The placement of some of the tanks under garden space rather than buildings, will restrict the capacity for deep soil planting, which is a far more sustainable way of managing water.

Whilst UK has complied with the minimum deep soil planting requirement set by the SEPP, I don't believe that this standard fits the particularly difficult water issues of the site.

Clearly, I am not a hydrologist, and I cannot afford to have my own independent study conducted. All I can offer you is lived experience.

Further to this, I was under the impression that the NSW government committed to halting any development on flood prone land, until all the various enquires and commissions had completed their findings and recommendations. Indeed, we had a visit from Chris Minns who came to the site in October 2022, to better understand the impacts of flood in the local area.

In my view, this part of the UK land should be left as is to continue its role as a Stormwater and flood collection point. It supports a vast array of frogs, snakes, lizards, bird and insect life which add value to our community.

UK could still redevelop the northern end of the site, with more modest ILU's (the three bedroom, 2 bathroom ILU's being proposed hardly seem targeted to the downsizing seniors market) and STILL deliver in excess of 100 affordable and available housing for seniors, and keep the new Aged Care facility as well.

TRAFFIC

I OBJECT to the UK development proposal on the grounds of severe impact of increased traffic flow, particularly along Beach Street, and Lorient Way. I feel that UK has failed to address point 7 of the SEAR, specifically regarding potential vehicle, bicycle, and pedestrian conflicts.

Currently, the access to the site is from an entrance on Kingscliff Street, which gives rise to the address, 24a Kingscliff Street:



Figure 3 The existing driveway from Kingscliff Street

Source: Ethos Urban

Because this entrance is off a main road, not far from a small roundabout, UK have determined that a second entrance would be a good idea.

To do this, they purchased four homes in Lorien Way, and plan to demolish them, to create a new entrance. They haven't stated it in their documentation (as far as I am aware..I have searched, however there are a LOT of pages) but it has become clear that this **so called second entrance is intended to act as the main entrance for most, if not all of the ILU's. When we met with a representative of UK, when asked how wide the driveway would be, the answer was "As wide as I can possibly make it".**

Lorien Way is a local street, just 8.15 metres wide from kerb to kerb (NOT 9 metres as claimed in appendix V, page 13). It was only ever intended to serve local residents, and those living in the adjacent streets running off. It is significantly narrower than Kingscliff Street (11.5 metres). There is a bus service than runs every half hour in each direction, and a school bus twice a day. It is a street in which children play, and neighbours chat on the sidewalk. It is considered a safe street for cyclists.

The proposal from UK will mean the sheer number of additional cars and commercial vehicles using Lorien Way as an entrance to the site will be vastly detrimental to the road in terms of safety and condition.

Because the parking areas are located some distance away from the ILU's in building A, I also anticipate that these 16 residents will seek to park on the street, thus further increasing congestion.

There are conflicting statements in the proposal..it is stated in the Traffic Impact Assessment (appendix V page 40, that boom gates will be installed, in an effort to control access. However, in the EIS, it is stated that there will be NO boomgates, so there will be no control.

I ALSO OBJECT to the use of Lorien way during the construction period of stage 1.

On page 194 of the EIS, it is stated:

"Following demolition of the Lorien Way Residences, the Lorien Way lots will be established as the contractor's main site access for the remainder of of stage 1..."

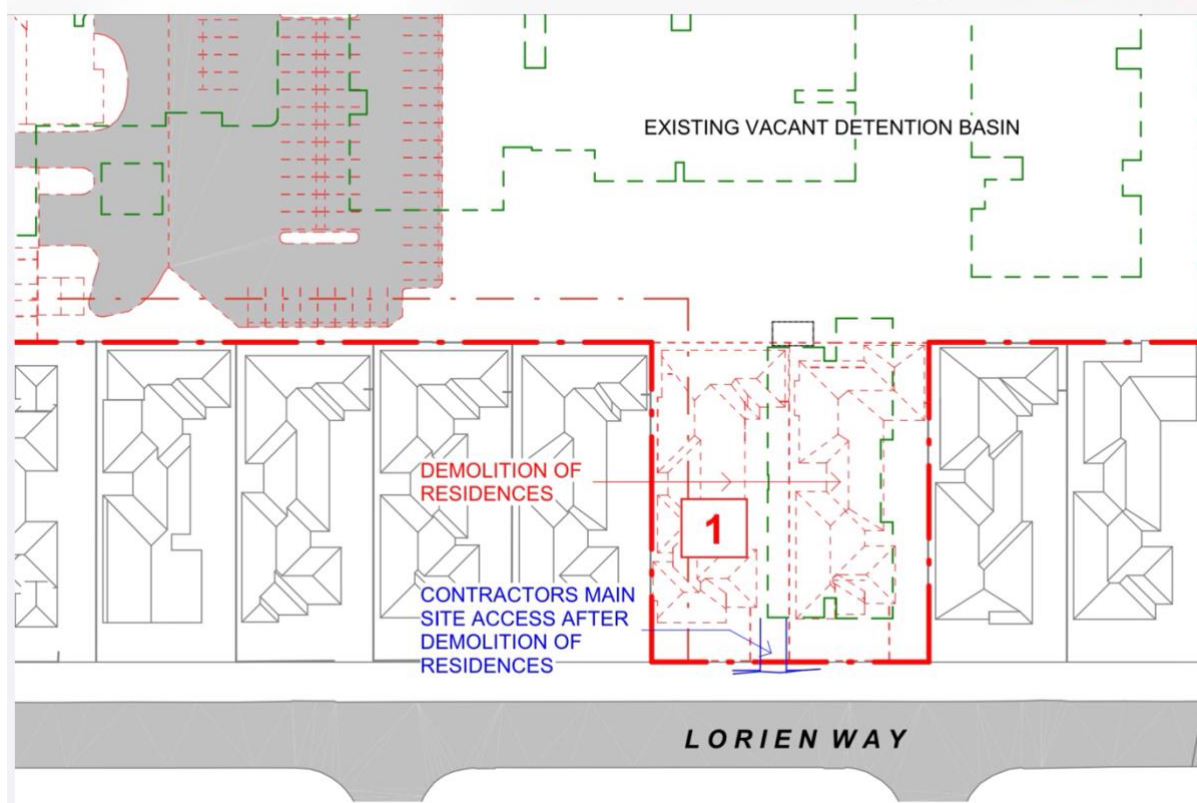
This is further confirmed by the diagram below, taken from the Architectural design report.

29 May

Appendix C - Architectural Design Report_V1



Done



I expect that this decision was taken because the Kingscliff entrance is used by pedestrians and because it is difficult to make a right turn into the development, after a small roundabout...construction traffic will cause significant tailbacks.

This means that residents in Beach Street and Lorien Way will have all manner of construction vehicles using the new entrance...everything from Tradies Utes, cement trucks, earthmoving trucks, and heavy earthmoving equipment...for a minimum of two years, on a narrow road. Those living in 21,23,33, and 35 Lorien Way, all of whom live right next to the proposed entrance will be particularly affected.

Kids will no longer be able to play on the footpath, and neighbours chats on the sidewalk will be a thing of the past. The street will no longer be safe for cyclists.

Most of this construction traffic will have to negotiate the roundabout at the Beach Street and Kingscliff Street intersection. This is a small urban roundabout, and is hard to negotiate at the best of times...I am dreading encountering a convoy of cement trucks and landfill trucks coming and going along my cycle route to the beach. The hours of operation could be 7am to 6 pm Monday to Friday, and from 8am to 3pm on Saturdays. (Different hours are quoted in different parts of the document). The only respite we will get will be on Sundays and public holidays, and even this could be at risk should they seek a permission variance later on. To me, this is a terrible way for us to be expected to live our lives and will have a significant impact on both our physical and mental health. In my view, despite what UK state, Lorien Way is not a suitable point for an entrance into the development.

So, at this point in time, it is apparent that Uniting has not properly solved the problem of access to the site during construction, and afterwards. It is imperative that a suitable solution is found before construction commences.

DENSITY AND HEIGHT

I OBJECT to the development proposal on the ground that the density and height of the buildings are excessive, particularly in relation to the surrounding area. I feel that UK has failed to adequately address point 4 of the SEAR document .

Whilst the majority of the development complies with density requirements, I believe that building A is trying to squash too many ILU's into an area zoned R2, low density. The council's guidelines suggest that 20 homes per hectare is appropriate.

Building A is located on Lorien Way, in amongst modest single storey buildings. At the northern end of the street there are some two storey town house complexes, mostly in blocks of three or four, and one with five. To place a two-storey building with three times the number of units amongst single storey homes shows that no real attempt has been made to keep the development within the character of the local environment. The original plans presented to the community showed 12 units in this building. We felt that 12 was way to many, and proposed 8 which would be slightly more than other multi dwelling lots on the street...instead, UK came back with 16, in a double loaded corridor, despite advising the SDRP that the building would have a single loaded corridor.

This is a low density area, and the Tweed LEP has a clear objective to support low density development in the area. Apartment buildings, which is what building A is, are not permitted in low density zoned areas.

I ALSO OBJECT to the fact that building A consists of only single bedroom units each approximately 52 square metres. This building has 16 of the 39 one bedroom units proposed, or 41%. I would like to see a mix of one and two-bedroom units in building A, thus integrating the lower cost, more affordable units in amongst the more expensive ones.

I OBJECT to the project on the grounds that the building heights, with the exception of building A, exceed what was advised to the general community. At the first consultation, we were presented plans with 5 storey buildings, which was a complete shock. We pointed out that it would be far more sensible to work to the council's height limit of 13.6 metres.

At the second community consultation, new plans were presented, and we were advised that building height was reduced to 13.6 metres...although the plans were difficult to read, and the diagrams were too fuzzy to see the heights recorded.

The 13.6 metres is supposed to start at Ground level. However, upon reading the EIS and building plans, it seems (although as a lay-person, I am struggling a bit to interpret these diagrams) as though UK intend to fill the land and treat the higher ground level as the starting point for building height calculation. UK claim in their EIS that the basin was excavated, and so should be given approval to be filled, but I can find no record of any excavation in past approvals. UK need to provide evidence of this rather than stating so without proof. It is quite possible that the basin was created when the surrounding land was filled to a 3.3 metre height to allow homes to be built.

All this means that buildings are significantly higher than we anticipated:

Page 70 of the EIS shows building heights as follows

Building A: 7.6 metres

Building B: 16.75 metres

Building C: 16.32 metres

Building D: 14.15 metres

Building E: 14.15 metres

Building F: 14.35 metres

RAC building: 15.85 metres

This is not what we were advised at the consultation sessions, and is at odds with the height limits for general residential land. This is incredibly important to the residents of Kingscliff. Our small coastal village is

a popular escape for tourists who value the change of pace and laid-back atmosphere offered by our local environment. There is a place for high rise buildings, and there is plenty available close by in Tweed, Coolangatta, and the Gold Coast. As a community we have always resisted pressure for increased heights, for precisely these reasons. Increased density can be achieved with smaller lots, terraced villas and townhouses, which is a far more appropriate response in our area. The Uniting Yamba development is a great example of how a seniors living development can fit within the existing residential area and would be far more suitable for Kingscliff.

SOLAR

I OBJECT to this development on the grounds that many of the apartments don't receive sufficient solar access, and also on the grounds that my own capacity to generate solar power will be significantly reduced. The development does not properly comply with point 5 of the SEARs document.

Firstly, the house-numbering on the shadow studies (appendix B part A, pages 28 and 29) are incorrect, and may lead to some confusion in the Planning Department when residents make their submissions.

Number 35 is numbered correctly

Number 33 is actually number 37

Number 37, is actually two properties, numbers 39, and 41.

The development does not comply with the Apartment Design Guide (ADG), which requires that in regional areas, 70% of all apartments receive a minimum **of 3 hours** of sunlight to liveable spaces. **This development only delivers 65% of apartments achieving the target (EIS, page 136).** This may seem trivial, however, three hours, and 70% are already shockingly low parameters, and this is yet another instance of developers pushing the boundaries beyond what is permitted.

I also object to the development having a significant impact on my ability to generate power from my own solar array. My roof currently generates slightly more power than we use. I still have a small power bill due to service charges, but as retirees ourselves, we budget for it and currently, can manage paying the bill. The solar studies shows that we will have access to sun from 12 noon to 3pm. However, our system starts producing from 6.30 am in winter, at which point **I believe that the shadows created by building B and C, both of which will be over 16 metres, coupled with the reduced solar access to our roof caused by the shadows generated by building A, will impact our capacity to generate the power we need.**

The situation could be improved if building A was set back further and was built as a single storey of terraced villas, and if the other buildings had a much lower profile.

The statement that the Blue Jay Circuit residents are not impacted because their main outside area is a communal courtyard is not true. The residents in the affected units use their courtyards, and dry their washing on lines out there..they most certainly will be affected.

Likewise, the residents in Drift Court have significant impact in the afternoon. Many of them have pools in their garden space, and the loss of sunshine in the afternoon will make these pools and their gardens far less inviting, particularly in winter.

The solar study diagrams are extremely difficult to read, with thick red boundary lines obscuring some of the detail. It seems that there will be shadow in my courtyard at the side of my house, possibly caused by the lift infrastructure...but I can't be sure.

I have requested the full details of the solar study from UK on at least two occasions, but they have been unable to provide it to me. As a normal person, I don't have the resources to commission my own study. You can take a look at the diagrams in appendix B, page 29.

VIEW LOSS, & VISUAL IMPACT

I OBJECT to this development proposal on the grounds that the View Loss and Visual Impact reports are incomplete, and that Visual Amenity is not properly considered for surrounding neighbours.

Point 4 in the SEAR document refers to built form and urban design. Point 5 requires that a high level of environmental amenity for surrounding residents must be demonstrated.

It is my belief that the built form in terms of bulk and scale in no way responds to the context, streetscape, and existing and future character of the locality. It is stated in several places throughout the proposal that building A has been designed to resemble a series of Townhouses. Frankly, as a double loaded corridor building, this is definitely not the case. The fact that it will be the **ONLY** apartment block on the street, and by far the largest block of dwellings in the area is inescapable.

Appendix T discusses Visual Loss Assessment, and part of this assessment includes details of visits to various properties on the perimeter.

However, on page 22, a **whole host of reasons are presented for excluding the property chosen for Lorien Way, yet no other alternative property was used as a substitute.**

Appendix S, which covers the Visual Impact has on page 11 mislabeled the picture as an Eastern aspect...it is in fact the Western side (Lorien Way), but the picture is a true representation of the general architecture of the homes on the street.

However, further into the document, on pages 41 and 42, **there is NO visual impact montage for Lorien Way.**

Given that Lorien Way forms one of the long boundaries running north to south, and consists mainly of single storey dwellings, assessment of view loss and visual impact for this street should have been included. It is clear to me that Visual Impact is likely to be quite pronounced, and I am puzzled as to why Lorien Way was left out in BOTH documents. The SEAR requirements have not been fulfilled.

AFFORDABLE/ LOW-COST SENIORS HOUSING

I OBJECT to the project on the grounds that the type of accommodation that will be provided by the project does not achieve a proper balance to suit the local senior population.

The EIS states on page 24 that the proposal represents significant input into dedicated seniors housing into the market with 199 ILU's and 120 aged care beds.

Of the 199 ILU's 41 will have three bedrooms, and two bathrooms: this does not at all seem appropriate for downsizing seniors, and the price at which they will be "sold" is likely to exclude much of the Tweed shire senior population. I feel that these and indeed many of the two bedroom units will end up in the hands of people wishing to move to the beach from other major centres, rather than catering for locals. I also object to the fact that there are actually **more 3 bedroom units than 1 bedroom units.** Uniting is a not-for-profit charity that aims to provide social housing, but in this instance, they seem to have strayed from their objective.

An increase of only Eight extra beds (currently at 112, proposed to be 120) is not a significant input into the provision of aged care services for the region. There are people in Kingscliff who have to search far

away for aged care positions for family, and this project does almost nothing to improve matters, and comes at great cost to the community.

COMMUNITY AMENITY AND CHARACTER IMPACTS

I OBJECT to this proposal on the grounds that the development in no way fits with the local character of our town. It will without doubt impact the amenity of the area in a detrimental way. Again, point 5 of the SEAR document has not been adequately addressed.

Firstly, the bulk and scale of the development is completely at odds with the area. Most of the buildings are too tall, and all of the buildings are far larger than anything else in the neighbourhood, and when presented en masse, will dominate the surrounding area in terms of presence, and population.

The Kingscliff Development Control Plan, is part of a comprehensive guidance document, and is part of the Kingscliff Locality plan (KLP). It has clear objectives for the existing residential precinct of West Kingscliff. The development is NOT a greenfield site as claimed in the EIS, and as such, should fit in with the aims of the KDCP for West Kingscliff, where it is situated.

I understand that as a State Significant Development, UK is not required to comply with this document, however, there are several references to this document in the paperwork, so clearly it is a document of interest.

Here is a link to the KDCP:

<https://www.tweed.nsw.gov.au/files/assets/public/v/1/documents/development-and-business/land-use-and-planning-controls/dcps/section-b26-kingscliff/section-b26-part-4-residential-areas.pdf>

The EIS for the development quotes several parts of the KDCP on page 28, but neglects to mention the following point.

The KDCP states

4.4.2 objectives

1. Continue to facilitate the development of low-density housing within the existing residential precinct

2. Facilitate opportunity for a greater mix of low-rise medium density housing types over the greenfield development sites across the less constrained parts of the precinct

This development is clearly located in the middle of a residential precinct, and its design does not in any way fit with the objectives stated by the KDCP. It is not a greenfield site.

The second objective refers to the easily accessible land that runs along Turnock street, further south of UK's land. This is not owned by UK.

4.4 West Kingscliff Precinct

4.4.1 Character Statement

The existing West Kingscliff Precinct was developed in the 1990s and has a low density residential character consisting predominantly of single and two storey dwellings. Other housing types include dual occupancies, low rise multi-unit housing and seniors and aged care accommodation. Elrond Drive is the primary collector road running through the precinct providing access to the local streets, many of which are dead end cul-de-sacs. Whilst this road network limits road connectivity through the precinct, a series of pathways provide some pedestrian connectivity between streets and open space areas. The existing open space areas are relatively small however there is a significant opportunity to further embellish lands adjoining the drainage corridor with pedestrian and cycling pathways linking this precinct with the precinct further north.

The greenfield development site within the West Kingscliff Precinct (see section 2.14) will be accessed from the Turnock Street (west) extension which will form the primary vehicular access from the Tweed Coast Road into the Kingscliff township. The greenfield development site presents an opportunity to develop a range of medium density, low rise medium and low density residential housing types with the southern development boundary defined by the Turnock St extension alignment and areas of environmental protection south of the road alignment.

4.4.2 Objectives:

1. Continue to facilitate the development of low density housing within the existing residential precinct.
2. Facilitate opportunity for a greater mix of low rise medium density housing types over the greenfield development site across the less constrained parts of the precinct which will front the Turnock Street extension.
3. Design the Turnock Street extension as a tree lined boulevard with shared path delineating between environmental protection land (to the south) and settlement development land (to the north) to provide a improved vehicular, pedestrian and cycling connectivity and a high level of visual amenity and ecological protection;

I ALSO OBJECT to the project on the grounds of excessive lighting. Point 5 of the SEAR documents refers to lighting impacts, and again, the UK proposal fails to comply.

Uk have proposed to place illuminated signs at the entrances of both Kingscliff Street, and Lorient Way. This is entirely inappropriate in Lorient way and will cause unnecessary light pollution in a quiet residential area. There are no other illuminated signs in the street, and there is already a streetlamp quite close to the entrance. It is highly unlikely that the entrance will be missed.

Other lighting throughout the complex is likely to be an issue. The current aged care facility has a rather poor record regarding the management of light pollution. Numerous complaints have been made regarding lighting shining directly into bedrooms, and it took some time before any measures were taken to address the issue.

I ALSO OBJECT to the project on the grounds of noise pollution. Our lives will be seriously affected during construction stage, but once built, there will be many units built close to the homes of existing residents...in some cases, as close as 5 metres. As people age, hearing deteriorates..and the volume button on the TV remote gets a bit of a workout...and I speak from experience, having cared for both my aged parents. I anticipate having to keep my windows closed to avoid the irritation of other people's televisions blaring out from their homes, and this is not the way I choose to live. We rarely use our air conditioners as our home has been designed to take best advantage of the prevailing breezes. I anticipate that as well as generating less power due to increased shading mentioned under the Solar objection, we will be using more power to keep cool as a result of keeping the windows closed.

Noise pollution is also going to be an issue for those residents living along the driveway running along the western edge of the development. Waste removal trucks will be visiting three times a week, and there will be constant coming and going of commercial vehicles, including ambulances, visiting the RAC building. I am also worried by the anticipated noise generated by construction. A safe level of noise over a prolonged period of time is 85 decibels. The project will be generating noise way over that level, as shown in appendix W on pages 17 and 18. If this level of noise was occasional, and short lived, it may have been

acceptable...however we will be living with it for four years, and it will be constant, particularly in the early stages of construction.

INFRASTRUCTURE

I OBJECT to the proposal on the grounds that such a large scale development will have a serious impact on the infrastructure of Kingscliff.

The development's location means that construction traffic will need to travel along Wommin Bay Road, Kingscliff Street, Beach Street, and Lorient Way.

Four years of construction is bound to have a negative impact on the state of our local roads some of which are already in poor condition.

In addition, there are three small roundabouts on Kingscliff Street that need to be negotiated, and contractors will need to turn right at the roundabout intersecting Beach and Kingscliff Street. This can be tricky in a large car, never mind in a large heavy earthmoving vehicle.

Residents living in the complex will need to take their cars out if they wish to do their grocery shopping, and if they choose to shop at the local supermarket, there will be significant additional pressure on the car park there, which is already struggling to cope. All this is going to affect the future liveability of the town.

SUMMARY

As you can see, there are many, many objections to this project, but the vast majority of these objections can be addressed by revisiting the project as a whole and reducing its scale to a more appropriate and fitting size.

The basin part of the land should be retained as a valuable area of green space that also performs the drainage function that protects the current aged care facility.

We absolutely need more aged care beds, and more senior's accommodation. However, there are future plans in place at Kings Forest, Cobaki, and on the land owned by Gales holdings, along Turnock Street, and it has been noted in the Kingscliff Locality plan (page 9) that these greenfield sites along with others in the local area will provide enough extra accommodation with a focus on diversity to meet local demographic needs, and to meet the anticipated growth in population for the next 30 years. There is absolutely no need to build such a huge development in an established residential area.

YES to a new Aged Care facility, but with more beds, **YES** to modest and affordable ILU's at an appropriate scale for the area, but a **RESOUNDING NO** to what is proposed by UK.

Uniting Kingscliff are perfectly within their rights to redevelop the site, however, I don't think they have the right to trash our town in the process.