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RE: DA2024/1091 - 5 / 1 Careel Head Road AVALON BEACH NSW 2107

Submission to Northern Beaches Council Regarding DA2024/1091 - 1 & 3 Careel Head Road, Avalon Beach

1. Introduction and Traffic Movement Assumptions

This submission relates to DA2024/1091, which proposes the demolition of existing structures and the construction of a mixed-use development comprising a Dan Murphy's liquor store, additional retail tenancies, and a 60-place childcare centre at 1 & 3 Careel Head Road, Avalon Beach.

The proposal raises several concerns regarding traffic impacts, infrastructure suitability, and land use compatibility.

The traffic report accompanying the DA estimates 26 additional trips along Burrawong Road during peak periods. However, this figure only accounts for traffic from the south and excludes trips from the north, which are also likely to use Burrawong Road to access the site via Whale Beach Road and Careel Head Road.

Moreover, the report focuses solely on peak periods and does not provide a total daily or weekly estimate of increased traffic volumes. This narrow scope fails to capture the full impact of the development on local roads, particularly during non-peak hours when deliveries, waste collection, and customer visits will still occur.

The SIDRA modelling used in the traffic report is based on limited survey periods (7-9am and 4-6pm weekdays, 10am-2pm Saturdays), which do not reflect the trading hours of existing retail shops (some of which close at 3-4pm) or the peak periods of childcare operations. This undermines the reliability of the traffic impact assessment.

The report assumes traffic from the north will detour via Surf Road and Whale Beach Road to access the site. This assumption is flawed, as Surf Road and Whale Beach Road are narrow and winding. Where vehicles park on both sides of the road, cars travelling in opposite directions cannot safely pass at the same time.

More plausibly, vehicles will:

- Turn left into Careel Head Road and perform a U-turn at the T-intersection with Burrawong Road.
- Alternatively, continue to Whale Beach Road, turn left into Burrawong Road, and then left

into Careel Head Road.

2. Intersection Safety and Infrastructure Deficiencies

The proposed development includes modifications to the intersection of Careel Head Road and Barrenjoey Road, including:

- A raised pedestrian crossing,
- A central median to restrict right-turn entry movements,
- Swept path analysis showing MRV and articulated bus movements.

However, the swept path diagrams show that both MRVs and buses encroach into the opposite lane when exiting onto Barrenjoey Road. While Council has accepted this due to existing constraints, it remains a safety concern, particularly during peak traffic periods. There has been no planning consideration for upgrades to the intersection of Barrenjoey Road and Whale Beach Road, which will bear the brunt of redirected traffic. Vehicles turning right from Barrenjoey Road into Whale Beach Road during peak hours often cause queuing or unsafe manoeuvres around stopped vehicles, disrupting northbound traffic flow.

Similarly, the intersection of Whale Beach Road and Burrawong Road is currently hazardous due to limited sightlines caused by parked vehicles and the road crest. Increased traffic will exacerbate these risks, yet the DA fails to propose any mitigation measures.

Additional infrastructure concerns include:

- The loading bay height clearance (3.8 m) is insufficient for standard MRVs, requiring either a reduction in truck size or a redesign of the loading dock.
- The exit driveway on Barrenjoey Road should be signposted as "Left Only" and widened to accommodate MRV turning movements without encroachment.
- A pedestrian sight triangle is not achievable due to neighbouring vegetation, requiring a STOP sign and speed hump to maintain pedestrian safety.

3. Impact on Burrawong Road Infrastructure

Burrawong Road is a local residential street not designed to accommodate sustained volumes of commercial traffic. The DA does not assess the long-term wear and tear on the road surface or the need for upgrades to accommodate heavier vehicles such as medium rigid trucks.

The cumulative impact of:

- Childcare drop-offs and pick-ups,
- Retail customer visits,
- Daily deliveries to Dan Murphys and other tenancies,
- Waste collection services,

on top of existing residential and public transport use, may accelerate deterioration of the road surface and reduce safety for residents and pedestrians.

Council should require a comprehensive infrastructure impact assessment that includes:

- Total projected daily traffic volumes on Burrawong Road,
- Vehicle type breakdown,
- Assessment of road surface capacity and structural resilience,
- Mitigation strategies, including potential road upgrades.

4. Inadequate Consideration of Peak Retail Periods and Seasonal Traffic

The traffic report does not adequately assess the impact of seasonal fluctuations, particularly during warmer months and school holidays when Barrenjoey Road can experience near-standstill conditions. During these times, the cumulative traffic from childcare, retail and delivery vehicles may significantly exceed the modelled peak volumes.

Council should require:

- Seasonal traffic modelling,
- Analysis of retail peak periods, including Dan Murphys trading hours and promotional events,
- Mitigation strategies to prevent traffic queuing into the development site and surrounding streets.

5. Co-location of Childcare Facility and Liquor Retail Outlet

The proposal includes a 60-place childcare centre situated directly above a Dan Murphy's liquor store. While acoustic barriers are proposed for the outdoor play areas, the concern is not about noise, but rather the appropriateness of co-locating a childcare facility with a bottle shop in a single development.

This raises questions about:

- Community expectations regarding the separation of child-focused services from alcohol-related retail,
- Operational compatibility, including delivery traffic and alcohol-related signage,
- Perception and appropriateness, particularly in terms of the message it sends about the integration of alcohol retail with early childhood education.

While access points are separated-with Dan Murphy's accessed from Barrenjoey Road and the childcare centre via the basement-the co-location itself may not align with best practice planning principles for early childhood environments.

Council should consider:

- The potential for discomfort or reputational concerns among families,
- The visibility and prominence of alcohol-related branding near the childcare facility,
- Alternative configurations that better separate these uses.