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**From:** DYPXCPWEB@northernbeaches.nsw.gov.au  
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03/10/2024

MR Matthew Thomas  
- 43 Careel Head RD  
Avalon Beach NSW 2107

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

While I welcome the redevelopment of the existing centre that is currently at the site, believe that additional childcare facilities are needed and also welcome the 2-storey height limit there are a number of objections I have to the proposal.

1. Avalon/Palm Beach is already well serviced by several bottle shops and as such there is no need for an additional store let alone a large format high volume store which will cause the closure of existing small businesses.

2. The location on the main thoroughfare to Palm Beach will encourage out of area visitors to stop and purchase alcohol that will be consumed at local beaches and add to the refuse and mess that is invariably left after they leave. This will have an additive impact and despoliation of the local area.

3. Traffic at this intersection is already disorganised and dangerous. I have personally been involved in an accident where a southbound driver "thought" they had right of way to exit from Barrenjoey Rd straight into the Careel Bay shops carpark. There is no solution to this problem as entering from Barrenjoey Rd will create even worse problems. This development will create significantly more vehicle movements and create even worse traffic than exists currently. Further construction traffic from a development of this scale will have huge impacts for the residents in the immediate vicinity and who use Careel Head Rd to access their properties. Further I cannot see how a childcare centre with 60 children is going to be catered for by the minimal carparking available on site. If all children are dropped off at the same time (say +/-15-30 mins parking time per child) then a minimum requirement of 30 vehicles plus staff carparking + retail customer parking would need to be accommodated on site at these times, arguably the afternoon pick up will be worse due to an expected higher volume of retail customers at that time. The report also does not note the number of heavy vehicles movements that the development will generate.

4. The peak traffic volumes used in the traffic report is fundamentally flawed and are not aligned with reality. The morning peak on Barrenjoey Road Southbound is between 0830 and 0900 as school traffic to Barrenjoey High, Avalon Primary and Maria Regina is highest at this time. The Northbound peak occurs at around 0630-0800 driven by inbound trades traffic. The weekday PM peak also aligns with school traffic from around 1500-1630 and again at around 1730-1830 as workers return home. The weekend peak midday traffic flow at 15 June is also flawed and gives a completely false representation. The peak weekend traffic flow period for Barrenjoey Rd is any warm sunny days from 1000-1300 northbound as both locals and

visitors head to the beaches and local eateries. The Southbound peak is on the same days as soon as the wind picks up and people vacate the beaches. On peak summer weekend and school holiday afternoons it can regularly take 20-30 minutes to travel from Careel Head Rd to the start of Bilgola bends. Turning in and out of Careel Head Rd at these times relies on the goodwill of through traffic allowing you to do so. The traffic volumes stated of 333 vehicle movements per hour at this time is completely incorrect as any local will tell you. Any high traffic generating development at this location should only be considered if traffic and infrastructure upgrades are in place prior to the development.

5. The traffic report also does not appear to adequately cover the impacts of additional traffic that will travel to this location to shop. The average per store revenue of a Dan Murphys store was \$5.8million in Financial Year 2023. Assuming an average sale of \$100 this equates to around 58,000 transactions/shopper visits per annum to which approximately 30,000 vehicle visits per annum need to be added for the childcare centre. It would be naïve to assume that this store will draw only local shoppers. It can be expected that customers will travel from Bilgola Plateau and Newport also thus increasing traffic on both Plateau Road and more concerningly on Barrenjoey Rd at Bilgola Bends.

6. Underground parking in a location that is regularly flood affected is also of concern. The site is only around 2m above sea level (not high tide but mean sea level) and therefore the finished floor level of the basement will be below the high tide level. Further this location regularly floods and is also affected by underground water flows from Bangalley headland as discovered during the development at 5-7 Careel Head Rd further uphill from this site. An environmental report noting the disruption to underground flows and potential for environmental impact when the basement flood and pollutants spill into the water should be provided.

7. Childcare and an Alcohol superstore are incompatible bedfellows. The location is also opposite the main sporting recreation facilities within the area, and this will have significant impression on children of all ages who use the playing fields and opposite a park where most local sporting activity occurs inappropriate.