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**From:** DYPXCPWEB@northernbeaches.nsw.gov.au  
**Sent:** 3/12/2025 1:25:12 PM  
**To:** DA Submission Mailbox  
**Subject:** Online Submission

03/12/2025

MR Gordon Xue  
26D Ralston AVE  
Belrose NSW 2085  
[REDACTED]

**RE: DA2025/1638 - 8 / 0 Pringle Avenue BELROSE NSW 2085**

To Whom It May Concern,

RE: DA1014/1638

I object to DA2025/1638 for the following reasons:

1. Contradiction to Warringah Council LEP 2011

The proposed development is contrary to the primary consideration of Warringah LEP 2011 - E1 Zoning objectives:

a) To provide a range of retail, business and community uses that serve the needs of the people who live in, work in or visit the area:

The local community does not require the addition of 4 new pumps to the surrounding residential areas, as there are no increases in housing density or residences. The local area is already serviced by 2x petrol stations within 1km of the subject site.

b) To encourage investment in local commercial development that generates employment opportunities and economic growth:

The installation of 4x petrol pumps will not generate any significant employment opportunities and economic growth, as typically a petrol station will only be staffed with one single person.

c) To enable residential development that contributes to a vibrant and active local centre and is consistent with Council's Strategic planning for residential development in the area:

The proposed development does not generate any residential development. This proposed development will prohibit any long term future development by causing contamination of the subject site.

NEO Consulting (the author of the Environmental Site Assessment), contradicts their own advice which are quoted on their website:

" The growing problem of service station contamination in NSW

Service stations are unfortunately one of the most at-risk sites for land contamination. The potential for leaks into surrounding soil and groundwater can stretch far beyond the boundaries of the property itself and be damaging to human and environmental health.

In Australia we have a particular problem with land impacted by a large distribution of service stations. Of the 25,000 service stations fuelling the nation in the 1970s, only 7,000 remain. The incoming wave of electronic transportation could see a further 80% of service stations close by 2030.

This will see more contaminated land brought to market with service station contamination. With many closed service station sites still unregistered or unmarked, land purchasers must conduct thorough pre-sale environmental investigations."

<https://neoconsulting.com.au/contaminated-land-remediation-nsw-service-stations/>

d) To ensure new development provides diverse and active street frontages to attract pedestrian traffic and to contribute to vibrant, diverse and functional streets and public spaces.

The installation of 4x petrol pumps, will increase traffic to the local area and will deter pedestrian traffic to the public space.

The traffic management report of The Transport Planning Partnership, does not address this concern, and does not take into consideration of local pedestrian traffic especially with a local primary school located within 50m of the subject site.

e) To create urban form that relates favourably in scale and in architectural and landscape treatment to neighbouring land uses and to the natural environment.

The neighbouring properties are all single or double storey residential houses, consisting of single family homes.

The proposed development with operation hours of 7am to 10pm Monday to Sunday is not in favourable treatment to the neighbouring land uses.

The installation of double sided illuminated 5.5m signage is not in a favourable architectural and landscape treatment to the neighbouring land use.

## 2. Prohibited Development

Warringah Council LEP 2011 specifically incorporates two prohibited use of E1 zone:

- i) Advertising structures
- ii) Vehicle repair stations

The development at the subject site, incorporates both of the prohibited use of E1 zoning.

## 3. Health Concerns

As the residence of 26D Devere Avenue, Belrose, I put forward my personal concern with the modification to the development.

1) The double sided illuminated sign of 5.5m in height, is at a height of our bedroom windows facing Devere Avenue and Pringle Avenue. The operation hours of 7am to 10pm 7 days a week, will cause adversely affect our family and children sleep patterns.

2) The current site has the petrol pump station decommissioned since 2008. The current site has a 0.2mg/kg benza(a)pyrene amount of bore hole 1.1, 4.1 and 4.2 (NEO Consulting report Table 19).

EPA recommendation of daily exposure to benzene vapour is 0.004 mg/kg/day. The current benzene toxicity level in the ground at 0.15m exceeds that of the EPA recommendation. Studies have shown chronic exposure to airborne benzene causes bone marrow deterioration, aplastic anemia, damage to immune systems, adverse reproductive affects and increase cancer risk. ([www.epa.gov/sites/default/files/2016-09/documents/benzene.pdf](http://www.epa.gov/sites/default/files/2016-09/documents/benzene.pdf))

To allow subject site to be an active petrol station again, will cause sever long-term detrimental health impact to the surrounding neighbouring residences.

#### 4. Stormwater Plan

Reference is made to Henry&Hyrnas general arrangement plan 230952\_DA\_C100, showing direct discharge of stormwater from the property to existing Council drainage system.

Concern is raised with the subject site being brough back to an active petrol pump station, the environmental impact of petrol spillage and run off into the Council drainage system.

Spillage from car filling will occur daily, the spilled petrol will float ontop of natural stormwater, the runoff will enter into Council drainage assets and causes environmental damages and contamination to the natural watercourse. This will have an adverse affect on the diverse local floral and fauna.

#### 5. Sustainability

The proposed development of the subject site, lacks consideration for sustainability in accordance with Northern Beach Council carbon footprint reduction.

<https://www.northernbeaches.nsw.gov.au/environment/climate-emergency-andsustainability/council-sustainability-actions>

No provision for electrical charge stations has been provisioned for, which will benefit the local neighbourhood.

#### 6. Conclusions

The proposed development is in contradiction to Warringah Council LEP 2011 objectives and incorporates prohibited land use of E1 zoning.

The proposed development lacks consideration for the local environmental impact to the neighbourhood and to Council stormwater assets.

The resubmission of DA2025/1638, makes no changes to the plans that address the withdrawn application of MOD2024/0227.