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To: DA Submission Mailbox
Subject: Online Submission

30/11/2025

MR Jon OLoughlin
14 Lyndale PL
Belrose NSW 2085
[REDACTED]

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

To Whom It May Concern,
RE: DA2025/1638

I object to DA2025/1638 for the following reasons:

1. Loss of amenity -The proposal to open the fuel station from 7.00am to 10.00pm, seven days a week would have a significant impact on our ability to peacefully enjoy our house and garden.

Currently, the vehicle servicing business is open Monday - Friday 7.30am to 6.00pm and the area where we are located is exceptionally quiet after 6.30pm on weekdays and, with the car servicing business closed on weekends, a new fuel station would severely impact our amenity and that of our neighbours

In addition, the proposed operating hours and fuel delivery and waste collection arrangements will generate unreasonable noise impacts to nearby residences, particularly during early morning and quieter evening periods, resulting in a loss of acoustic amenity. To be clear, the site being considered under the DA is only 27.2m from our bedroom, so the noise and disturbance would not be minimal.

The development will intensify local traffic and parking demand on a narrow residential street, reducing safety, increasing congestion, and diminishing the amenity of the neighbourhood.

2. Contradiction to Warringah Council LEP 2011

This should be considered an application for an entirely new fuel station. This is therefore a prohibited development within a B1 Neighbourhood Centre zone.

Furthermore, it is evident that the 2008 application to turn the location into a car wash and the subsequent the decommissioning of the fuel tanks in 2013 was a clear demonstration that the site was to no longer be considered a fuel station. As such, the site does not, therefore, benefit from existing use rights as a fuel station.

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

a) 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. Indeed, the removal of the car wash facility will result in the loss of one job, so there is zero net gain to employment as a result of this change for the applicant.

The addition of a shop to the current site does not give consideration to the potential negative impact on other local businesses. Specifically, this will undoubtedly impact the IGA, which is immediately adjacent to the site. As the IGA is already open 8am - 8pm, we are already

served perfectly well by the IGA. Indeed, there is potential for a fuel station shop to negatively impact the IGA, which could have a negative impact on their employment levels.

b) 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.

It is also notable that NEO Consulting confirm the future risk of contaminated land (resulting from fuel stations) being brought to market once they exceed their commercial viability. They quote 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.

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

d) To ensure new developments 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.

Indeed, the fact that the site is located entirely within a school zone and given children are at risk around school areas because they are small, can't be easily seen by drivers, are more prone to running, have difficulty judging vehicle speeds and gaps, and have poorer perceptive skills than adults represents a significant and unnecessary risk to children and their parents who walk to and from school each day.

Furthermore, the site will likely attract significant traffic, including heavy goods vehicles, diverting from Forest Way in search of fuel having identified the location from fuel apps. This adds significant additional and unnecessary risk considering there is a fuel station approximately 600m further along Forest Way.

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 a 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. For reference, the current business does not operate any illuminated signage.

3. Prohibited Development - Warringah Council LEP 2011 specifically incorporates two prohibited uses 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.

4. Swept Path analysis

The swept path analysis is based on tankers turning left into the site from Pringle Ave. Given tankers are not permitted to use residential streets, the analysis suggests tankers would use a long stretch of Pringle Ave, having gained access to Pringle via a number of other residential streets that link Forest Way to Pringle Ave. This proposed analysis should be sufficient to deny the application.

Furthermore, whatever way tankers access the site, they will need to enter the school zone, which constitutes an inadvisable and unnecessary risk.

5. Health concerns:

i) The double-sided illuminated sign of 5.5m in height, is at a height above our bedroom windows facing Pringle Avenue. The operation hours of 7am to 10pm 7 days a week, will adversely affect our sleep patterns, especially given one of our daughters is a nurse working in the neo-natal intensive care unit at Royal North Shore Hospital and works shifts.

ii) 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 (Source: NEO Consulting report Table 19 from previously withdrawn application MOD2024/0227).

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 anaemia, damage to immune systems, adverse reproductive affects and increase cancer risk. (www.epa.gov/sites/default/files/2016-09/documents/benzene.pdf) To allow the subject site to be an active petrol station again, will cause sever long-term detrimental health impact to the surrounding neighbouring residences and risk the health of children attending Belrose Public School.

6. Stormwater Plan

Objection is raised with the subject site becoming a new, active petrol pump station and the associated 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 on top of natural stormwater, the runoff will enter Council drainage assets and cause environmental damage and contamination to the natural watercourse. This will have an adverse effect on the diverse local floral and fauna.

In the event of a flood (the site is located in a flood zone), nothing is mentioned regarding how a fuel station would prevent the overflow of fuel to the local area. As our house is at a lower ground level than the site, any flood water would run toward our house, potentially contaminating our property with dangerous liquids.

7. 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-and-sustainability/council-sustainability-actions> and the Protect. Create. Live. Environment and Climate Change Strategy 2040.

While the strategy clearly states 'we all need to reduce our carbon emissions to mitigate the future impacts of climate change' and recognising Council have begun replacing the current car fleet with electric and plug-in hybrid vehicles, it is imperative that Council continue to find ways to reduce public reliance on petrol- and diesel-powered vehicles. Approving a new fuel station sends the wrong message to the public. In addition, the lack of provision for electrical charge stations, will provide no benefit to the council's growing fleet of EVs and the local neighbourhood.

Furthermore, on 11 December 2023, the Climate Change (Net Zero Future) Act 2023 commenced. The Act legislates NSW's targets to reduce greenhouse gas emissions (GHG) by 50% by 2030, 70% by 2035, to achieve net zero GHG emissions by 2050, and allows

regulations to prescribe interim GHG emissions targets.

Similarly, the Federal Government has recently announced plans to further reduce emissions targets for new vehicles, which will inevitably reduce demand for fuel. As such, a fuel station will hinder the delivery of these targets as it will encourage people to drive more, rather than take public transport.

8. On page 10 of the Traffic Report there is a reference to distance of the exit of the site to the sight lines of traffic approaching the roundabout westbound from Ralston Avenue. While the report states traffic slows when turning into Pringle Avenue, the reality is that the roundabout actually allows drivers to maintain their speed when turning, with many turning at 50 Kmh. Under current conditions, the 35m distance is insufficient for current guidelines.

Furthermore, the roundabout has marker posts on the pathway that runs to the north side - Several posts have been knocked down in the last few months by vehicles taking the roundabout too quickly, which reinforces that speed remains a problem on the roundabout. In addition, car accidents are a regular occurrence at the roundabout. The additional traffic will only increase the likelihood of accidents, especially among drivers who have left Forest Way looking for fuel and who are unfamiliar with the risks of the location.

In addition, the report fails to address the risk of vehicles exiting the site by turning right, southbound onto Pringle Avenue. This already happens regularly and poses a significant risk to the residents of Lyndale Place, who are exiting onto Pringle Avenue in either direction. Should the fuel station be approved, drivers who are unfamiliar with the local road conditions will increase the risk of accidents happening.

Similarly, in the event that cars divert from Forest Way and queue to enter the fuel station, Lyndale Place residents would be faced with cars queuing to turn right into the forecourt, blocking our ability to exit Lyndale Place.

9. The traffic report also states an assumed 77 vehicle trips am peak hour; 111 pm peak hour. Based on simple extrapolation, this means the fuel station would generate around 800-900 vehicles per day. Given at least 50% of these would be non-passing trade, this represents approx. 400-500 additional cars per day on Pringle Ave and Ralston Ave. In addition, at weekends all traffic to the fuel station would be extra. Thus generating significant additional noise, pollution and risk to local residents, including children attending Belrose Public School.

10. Although the application utilises the services of a specialist Traffic consultancy, it is evident that the Heartland Motors case study used in their assessment does not represent the reality of this site. Rather than use models that lack direct comparability, they could have asked the service centre to provide daily activity reports for both cars being serviced and the car wash.

To rectify this and to provide a factual assessment, since being notified of the DA I have been monitoring the activity of the current car servicing business. I have taken photos of the location at the same time (11.30am) every day - photos are available if required.

Below is a table that shows how many vehicles were present on-site each day - Note: the car wash was only active on one day and only washed a single car; the figures below should therefore be used as confirmation of vehicle service activity, not combined vehicle servicing and car washing. It also means that the noise assessment in the application incorrectly assumes the reduction in noise from the elimination of the car wash:

Date Number of vehicles Car wash activity

18/11/2025 16

19/11/2025 20

20/11/2025 18

21/11/2025 16

22/11/2025 0

23/11/2025 0

24/11/2025 19
25/11/2025 19
26/11/2025 28 1 car being washed
27/11/2025 23
28/11/2025 21
29/11/2025 0
30/11/2025 0

Average number per day (when open) 20

Given the DA states there is no intention for the car servicing operation to reduce their volume of business, it is evident that the current plans do not provide anywhere near sufficient on-site parking. Should the application be approved, this would result in significant numbers of cars being parked on Pringle Avenue and Ralston Avenue. Indeed, my photos show a number of cars parking illegally (either too close to road junctions, bus stops and even on the nature strip). As there are also two bus stops less than 20m from the entrance of the site on Pringle Ave and two more in close proximity on Ralston Ave plus the roundabout, the additional cars parked will represent a hazard to local residents and children walking to Belrose Public School and to drivers unfamiliar with the local roads. It will also present bus drivers with significant additional challenges and increase the risk of hitting parked cars (not dissimilar to what has happened on Glen Street in the last 3-4 years).

9. Contrary to the application, as stated on the Northern Beaches Council website, both Pringle Avenue and Ralston Avenue are designated under the Road Cycling Network and are proposed to be part of the Safe Cycling Network (Tier 3):

To be clear: In New South Wales (NSW), the safe cycling network is supported by the Strategic Cycleway Corridor program, which aims to establish safe and convenient cycleways across the Six Cities Region. This program focuses on creating accessible bike networks that connect various centers and places, enhancing the accessibility of cycling for everyone, including children, parents, and individuals with disabilities.

The approval of the fuel station would therefore constitute an unacceptable risk for cyclists who are hoping to use roads that are designated 'Safe' by the Council.

11. There are currently two fuel stations in Belrose, one at Glenrose Shopping Centre and the other on Forest Way. In addition, there are 31 (thirty-one) fuel stations located within a 10 km radius of this site - put simply, we do not need another fuel station, especially one in a school zone and residential area.

12. The proposal will result in an unreasonable loss of privacy to my family due to the likely installation of additional CCTV cameras, which would breach my family's privacy.

Conclusion

The proposed development is significantly flawed and should not be approved by council.

Please also note that my email to Councillor Heins was loaded by her team to the DA site. This submission represents my formal and detailed objections.

Also, should there be an opportunity to attend the meeting where this DA is discussed, I would like to avail myself of the opportunity to address the meeting in person. Please advise if this will be possible.

