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**From:** DYPXCPWEB@northernbeaches.nsw.gov.au  
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**Subject:** Online Submission

02/12/2025

DR JOHN CAO  
11 LYNDAL PL  
BELROSE NSW 2085  
[REDACTED]

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

02/12/2025

DR John Cao  
11 Lyndale PL  
Belrose NSW 2085

RE: Objection to DA2025/1638

Dear Sir/Madam,

I am writing this to voice my opposition against the submitted development application (DA2025/1638) at 8 / 0 Pringle Ave Belrose. The applicant applied for a modification to existing use in 2024 and subsequently withdrew the application after opposition from local residents and the council. They are now reapplying as a new development (Alterations and additions to commercial development) and has attempted to address some of these concerns. Unfortunately I do not believe their proposals have addressed these.

My primary concern as I had alluded to in my previous objection refers to the inappropriateness of the site for a petrol service station. Specifically regarding increased traffic, safety of residents and children near the local school and lack of parking considerations at what is essentially a choke point in the intersection of two busy roads. In this new application they have attempted to address this by using TTPP to make a traffic impact assessment in their favour for the proposal.

This report is flawed in several aspects which I will highlight:

Parking provision and policy compliance

- WDCP non-compliance: The report itself acknowledges the proposal provides only 10 on-site spaces against the Warringah DCP 2011 requirement of 20 (6 per service bay x 3 bays + 5/100 m<sup>2</sup> x ~45 m<sup>2</sup> convenience store) [Table 4.1, p.12]. Substituting an ad-hoc "updated" rate of 1.5 spaces per bay plus staff and shop allowances to reach ~9.75 spaces is not a recognised WDCP standard and cannot lawfully substitute the applicable control [Table 4.3, p.15]. The statutory benchmark remains 20 spaces.

- Inappropriate reliance on anecdote: The "Heartland Motors" example (Castle Hill) used

dealer-servicing data to challenge the 6 spaces/hoist figure [pp.13-14]. That site operates a modern franchise workshop with 18 hoists and indoor storage, unlike a small, mixed-use service station workshop in a Local Centre with school-zone constraints. Anecdotal throughput from a fundamentally different land use should not override WDCP's adopted rate for service bays on this site.

- Browsers are not parking spaces: The claim that "eight additional parking spaces" exist at the refuelling dispensers is operationally unsafe: browsers are queuing/servicing positions, not general parking. Using them to meet shop parking demand increases conflict, blocks circulation, and extends dwell times-contradicting the report's own observed dwell time and circulation objectives [p.15]. AS2890.1 design practice treats pump islands as queuing/servicing, not as parking supply.

#### On-site circulation and safety risks

- Documented conflicts at exit: The report concedes parallel spaces along the northern boundary must "give-way to refuelling vehicles" when exiting, and that these spaces are for workshop management [p.10]. That is a designed conflict point that relies on perfect operational discipline. It introduces predictable blockages where workshop vehicles must wait in the forecourt until refuelling channels clear, increasing reverse/turn manoeuvres across live fuel lanes.

- Service vehicle constraints not demonstrated: The text requires all service vehicles (waste/fuel) to be under 3.5 m because of a 3.75 m canopy [p.9], yet swept-paths show an 8.8 m MRV and a "10.5 m Hornsby garbage truck (Commercial)" as a fuel-truck comparable vehicle [Appendix B, Figures 2-3] - with a listed body height 3.5 m exactly for the garbage truck. Fuel tankers and modern waste vehicles often exceed 3.5 m in operational configurations (exhausts, hatches, booms). The report does not evidence actual fleet compliance or contractor commitment; "bespoke" vehicles are asserted without binding conditions or verifiable specifications [pp.17-18].

- Loading/waste plan displaces parking into the forecourt: The waste plan reassigns two car spaces as a loading zone during collection and moves stored cars to the first browser [Figure 4.1, p.18]. That creates mixed use of the fuel lane as a temporary loading area and removes customer capacity during collections-an avoidable safety and queuing risk in a constrained forecourt, especially near school-zone times.

#### Sight distance and roundabout proximity

- Standards misapplied: The report cites AS2890.1:2004 and states a minimum stopping sight distance (SSD) of 45 m for 50 km/h frontage speed, but then reduces the target to 35 m on the assumption that vehicles "tend to travel at 30-40 km/h" at roundabouts [p.11]. That assumption is speculative and ignores peak-period variability, queue spillback, and school-zone driver behaviour. As stated, the egress driveway is ~35 m south of the roundabout [p.11], leaving little margin if queues form back from the circulating lane. A compliant SSD should be demonstrated for the posted speed or through a formal operational analysis; the report offers neither.

- School zone and pedestrian crossing not assessed: The frontage includes a 40 km/h school zone and a zebra crossing west of Belrose Village [p.6]. No pedestrian conflict analysis, gap-acceptance or queue length modelling is provided to test driveway operations during school

peaks. Relying on a 35 m visual triangle without operational modelling is insufficient in a sensitive pedestrian environment.

#### Trip generation and network impacts

- Pass-by discount unsupported locally: The report calculates 77 AM and 111 PM peak trips using the TfNSW Guide rates, then applies broad pass-by shares (56% ITE, "70-80% mooted in the Land & Environment Court") to reduce "new" trips to 34 and 49, and finally subtracts 5 trips to account for removing one car-wash bay [pp.19-20]. Those discounts are not validated by local counts or surveys for this site and context (adjacent school and village centre). Absent a local split of primary/linked/pass-by trips, the asserted reductions are speculative.

- Car wash subtraction lacks evidence: The subtraction of 5 vph for the removed car-wash bay is lifted from a TfNSW survey average and then caveated that single-bay sites may have higher turnover [p.19], yet the report still chooses the lower figure. Without observed counts for the existing use, the net-impact calculation is fragile.

- No SIDRA/queue analysis at key nodes: The site lies ~35 m from the Pringle/Ralston roundabout [p.11] and near Forest Way accesses. There is no capacity analysis (e.g., SIDRA) of driveway interactions, roundabout performance, or of peak-hour turning movement distribution-so claims of "no adverse impacts" are not substantiated by intersection modelling [p.20].

#### Design standards and accessibility

- Accessible bay location/functionality: Providing a single accessible bay to meet NCC's 1 per 50 rule [p.16] is not enough. The plan places accessible parking within or adjacent to the active forecourt where vehicle movements, hose reach, and spill-safe areas are present [Appendix A]. The path of travel would cross high-conflict zones without demonstrated protection, shelter, or compliant gradients under AS2890.6 beyond a note to "ensure max 1:40 crossfall" [Appendix A].

- Bicycle/motorcycle parking dismissed: The report declines any bicycle parking because "cycling infrastructure is limited" and because of "nature of service station operation" [p.16-17], despite direct frontage to footpaths and proximity to local trip attractors (school, village). This ignores contemporary policy intent to support short local trips by active modes and safe micro-mobility parking at mixed-use Local Centre sites.

#### Procedural and internal inconsistencies

- Vehicle type inconsistencies: The text repeatedly references a "10 m fuel truck," while swept-paths use a 10.5 m garbage truck as "comparable" [Appendix B]. Turning paths, clearances, and height constraints should be demonstrated for the actual tanker type and configuration to be contracted, not a proxy.

- Operational management as mitigation: The report proposes scheduling deliveries "outside of road network and school peak hours" and relies on site management to reshuffle vehicles and cone-off areas [pp.17-18]. These are soft mitigations, not engineered solutions; they are difficult to enforce and monitor and do not address baseline design non-compliances with WDCP parking supply or forecourt conflicts.

Once again, I would like to highlight that there is limited advantage in terms of providing additional amenities through the reintroduction of a petroleum service station at 117 Pringle Avenue, Belrose.

a. Whilst competition can benefit consumers, the locality is already well-served as I had demonstrated during my last response to the proposal. Within Belrose, there are two service stations within 1 km and at least five additional stations within 5 km, including major brands such as BP and Caltex as well as independents. This density of supply indicates that the area is not underserved.

b. According to the 2021 ABS Census, Belrose has 3,079 households and a population of 8,652. With this scale of demand, the existing service stations already provide sufficient coverage, and Northern Beaches Council's Local Centre zoning emphasises balanced land use rather than oversupply of a single amenity.

c. Current policy direction at both state and local levels prioritises a transition to zero-emission vehicles. The NSW Electric Vehicle Strategy sets a target for EVs to represent more than 50% of new car sales by 2030-31 and the vast majority by 2035. Northern Beaches Council has already installed over 20 EV charging locations and continues to expand infrastructure to support this shift. NSW has surpassed 100,000 registered EVs, saving an estimated 121 million litres of petrol annually. This demonstrates that petroleum-based refuelling is becoming obsolete, undermining the argument for increased amenities in the form of new fuel stations.

d. Historically, the Belrose site ceased fuel sales in 2013 due to declining demand and was converted into a car wash and workshop. This closure reflected the mismatch between community needs and the business case for petroleum retailing. Current conditions-marked by strong EV uptake and council investment in charging infrastructure-reinforce that reinstating fuel sales does not align with community demand, sustainability goals, or economic viability.

In conclusion, I hope the above points which I have made will be taken into consideration by the council. I do not believe the applicants have addressed any of the safety, parking or the location of their proposal and have attempted to make an argument using external consultants that are clearly flawed. I don't believe the proposal offers an overall benefit that would outweigh the issues it would generate and hence not in the community's interest for this development to go ahead. I strongly ask the council to review and REJECT this proposal.