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**Sent:** 25/09/2020 4:43:55 PM  
**Subject:** Objection - DA2020/1039 - Bus Depot Proposal 15 Jubilee Ave Warriewood  
**Attachments:** Objection - DA2020 1039 - Bus Depot Proposal 15 Jubilee Ave Warriewood.pdf;

Dear Sir/Madam,

Please find attached our objection to the proposed development - Bus Depot - 15 Jubilee Ave Warriewood DA2020/1039.

Kind regards

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## **Objection - Proposed Development DA2020/1039 Bus Depot 15 Jubilee Ave Warriewood**

We strongly object to the proposal to this Development Application and make the following submission:

### **Overview**

- The site appears too small. Bus turning circles on site appear to rely on some bus bays being left vacant in order to manoeuvre buses.
- Insufficient parking for drivers and staff on site. Reduced street parking available. Use of adjacent Pittwater RSL and other adjacent factory/office complexes as potential staff overflow parking.
- Access is limited due to the narrow width of Jubilee Avenue. Buses will be exiting onto the wrong side of unbroken double centre lines across the entrances to Pharmacare and Blackmores staff driveways, this is dangerous. The proposed eastern entrance is directly opposite Blackmores semi trailer loading dock entry.
- Traffic Report assessment of Ponderosa Jubilee roundabout does not accurately reflect the number of cars queued back in the morning or afternoon peak periods. Queues are significantly longer than those recorded.
- Nothing to prevent buses using residential 3 tonne load limited streets for ease of access to/from the depot from the east.
- Noise will impact the amenity of surrounding residents. Any noise will be reflected and directed towards residential areas due to sound bouncing off the existing factory walls bordering the site. Proposed acoustic barrier is not designed to limit noise to surrounding uphill residents.
- Lighting will adversely impact the amenity of surrounding residents all night, every night. No indication if full lighting or partial security lighting overnight. Light towers will be visible from surrounding residences.
- The Reports appear to offer conflicting information as to vehicle numbers. Plans Master Set indicates 15 buses on site overnight. The SECA Solutions Traffic Report show 31 buses (22+9) leaving the depot from 6am and 28 cars arriving. The Acoustic Report however advises 7 buses leaving and 20 cars arriving from 5am.

This Development Application has been submitted with flawed and deficient Acoustic, Traffic and Lighting Reports which display disregard for compliance with Northern Beaches Council guidelines.

The Acoustic Report advises the bus depot should have no adverse noise effect on the nearest residential receiver, being the house directly next door, provided an acoustic barrier 4 metres tall is installed along the boundary with that house. However other residences up the hill to the east in Warriewood Road, which are as close as 85 metres, can presently look down into the proposed site and will see and hear the buses over the top of a 4 metre high acoustic barrier and the 5 metre high (max) row of trees proposed. The Acoustic Report fails to consider these other residences and fails to acknowledge reflected sound from the depot bouncing off the existing factory walls to the west and south. These walls will direct any noise towards the residential receivers uphill to the east and north.

The Acoustic Report relies solely on achieving its noise compliance by setting out a series of recommendations that the bus depot must adhere to in an effort to not adversely impact the amenity of the local residents. These recommendations include silencing the bus reversing alarms at night, minimising idling of the buses, no excessive acceleration or sounding the bus horns whilst in the depot.

Should the buses use their reversing alarms or horns, rev engines or idle excessively the acoustic report noise compliance will apparently be unachievable and invalid. However buses, by law, are

required to use a reversing alarm that cannot be switched off. Buses in government depots are also required to sound their horn twice before reversing.

Furthermore the Acoustic Report stipulates all bus movements to only be conducted to the west of the eastern driveway of the proposed depot, with no buses to travel further east up Jubilee Avenue towards the residential streets. The traffic consultant's report on the other hand actually suggests the buses use streets to the east of the depot for ease of access to the site.

The Traffic Report includes a flow diagram showing buses will be unable to negotiate a right turn at the roundabout from Ponderosa Parade into Jubilee Avenue without driving up the kerb and over the grass verge outside Pharmicare. The Traffic Report advises all buses returning to the depot along Ponderosa from the south should instead continue along Ponderosa Parade to Mona Vale Road, go around the block and enter the depot via Foley Street and Jubilee Avenue from the east. The Traffic Report confirms Foley Street has a 3 tonne load limit but suggests this is an acceptable detour should Council concede to overlooking the 3 tonne limit for these buses.

Obviously buses travelling on Jubilee Avenue east of the depot will render the acoustic engineer's noise compliance unachievable and worthless.

The Traffic Report shows flow diagrams of buses leaving the depot driving onto the wrong side of double centre lines to negotiate the left turn out of the depot. Should buses enter the depot from the east they will also need to divert over the unbroken double centre lines in order to turn left into the depot. These diversions onto the wrong side of the road are directly across the staff driveways of Pharmicare and Blackmores. These companies each have off street parking for over 250 employees and visitors. They will not expect buses coming at them on the wrong side of the road as they use their driveways.

The Traffic Report and Acoustic Report both fail to include any mention of fuel tankers, presumably semi trailers, in any flow diagrams or access restrictions or noise calculations. No indication of the frequency or time of day of refuelling.

No mention of safety precautions or pollution measures for the above ground bulk fuel storage tank which will be located just 30 metres away from the adjacent residence and 55 metres from a tributary of Narrabeen Creek.

The Lighting Report indicates no adverse effect on the nearest residential receiver provided the eight metre tall light towers are positioned correctly but advises glare guards may be required should the lighting have adverse effect on the surrounding neighbours. However there is no indication if the proposed light towers will affect the residential properties which look down onto the proposed depot. Curfew lighting of 5 lux is mentioned but no indication what curfew hours are to be imposed. There is no mention of any overnight security lighting and if it will be subdued lighting or all nine light towers on full all night.

## Detailed Review

### Hours of Operation

The DA plans indicate parking for 48 buses with proposed hours of operation from 5am until 11pm. The Traffic Report advises 22 buses exiting the depot between 6am and 7am, last buses returning at 11pm. One report mentions this bus depot is for commuter buses. Our local 185 bus starts the day passing my home at 5:30am and the last bus passing northward at 12:30pm, another passing southward at 12:50am.

If CDC are to run the existing local commuter services as reported, will buses be returning to this depot after the stated 11pm closing time? If not now, will future demand see these closing times extended?

## Noise To Nearby Residents

The site is currently a grass paddock of only some 4,500 sq metres surrounded on the west and south sides by two-storey factory walls. These walls will reflect all noise from the proposed depot up the hill to the surrounding residential areas to the east and north.

The Acoustic Dynamics acoustic report advises an acoustic wall of 4 metres high will be required along the east boundary with plantings of Blueberry Ash (max 5m tall) to screen the acoustic wall along the boundary. This acoustic wall has been designed to only benefit the *“the adjacent receiver”* that is the house directly adjacent to the east at 19 Jubilee. The acoustic barrier will have no benefit for those residents who live uphill from the site and look down onto the site. In fact we residents can look down directly to ground level of the factory building to the west of this paddock. So it stands to reason any sound will bounce off the factory wall to the residents uphill. We will be able to see the buses, so we will surely hear the buses. The proposed site is only 85 metres from the nearest house in Warriewood Road. Residents will hear all noise produced in that depot from this short distance.

The Acoustic Dynamics Noise Emission Report appears flawed and contradictory.

The Acoustic Dynamics report clause 5.1.2 recommends *“All buses must leave the site via the western driveway and travel towards Ponderosa Parade”*. And *“All buses arrive to the depot from Ponderosa Parade to the west of the subject site, and must not travel further than the eastern boundary of the subject site on Jubilee Avenue”*.

Obviously this recommendation has been included to minimise noise to the adjacent residence and those in Warriewood Road and further up the hill to the east.

In fact Acoustic Dynamics Noise Level Assessment is based on these travel restrictions being adhered to in order for their noise calculations to pass and the DA to be acceptable. Unfortunately the SECA Solutions Traffic Report appears to contradict these travel restrictions and advises that buses will be unable to turn right into Ponderosa from the south and *“For a bus wishing to access the depot from the south via Ponderosa Parade, the bus would need to continue north to Mona Vale Road, turn right at the traffic signals and then turn right at Foley Street to then access the site via Jubilee Avenue”*. (See clause **Traffic** below)

So it would appear the Acoustic Dynamics Noise Assessment is now flawed because buses may well be travelling down (or up) Jubilee Ave from the residential area to the east because they cannot turn into Jubilee from the south.

In clause 4.1 *Noise Emission Assessment*, Acoustic Dynamics state they have determined the noise emission levels for this bus depot from *“Acoustic Dynamics’ experience with bus depot noise emission assessments”*.

In clause 5.1.2 *Recommendations*, Acoustic Dynamics recommends buses minimise idling time, excessive acceleration and the use of horns. It also recommends where possible, prevent the use of reversing alarms before 7am and after 6pm.

I have it on good authority from a bus driver that reversing alarms by law cannot be switched off and before a bus can reverse in the depot it is required to blow its horn twice before reversing as a warning to other staff.

It would again appear the Acoustic Dynamics Noise Assessment is questionable. Reversing alarms and horns, it seems will be used in the depot every time a bus reverses. Acoustic Dynamics should have been aware of this with their *“experience with bus depot noise emission assessments”*.

Clearly Acoustic Dynamics Noise Assessment needed to include these recommendations to justify their noise calculations and because they considered there was potential noise disturbances to the surrounding residential properties if these recommendations were not incorporated. In fact they begin their report in clause 1.1 *Summary and Background Information*, by stating: *“As a part of this*

*assessment, recommendations are provided to enable compliance with the relevant noise emission criteria".* As shown above these recommendations cannot be fulfilled or enforced. Therefore the Acoustic Dynamics report cannot prove compliance with the relevant noise emission criteria, so their acoustic report should be disregarded as part of this Development Application.

The layout of the bus parking shows some 18 bus parking bays against the factory wall to the west. Flow diagrams clearly show buses reversing to enter or exit these bays. So reversing of buses will definitely be undertaken with reversing alarms, and possibly horns sounding. At what time of day or night cannot be policed.

How long until the bus drivers start using the shortcut east up Jubilee and through the residential streets instead of driving around the block to get to Pittwater Road? Will Council be prepared to monitor and police this?

### Lighting

There will be nine 8 metre light poles. The electrical diagram appears to show no light spill onto the adjacent house at 19 Jubilee. But residents up the hill will definitely see the light poles from their elevated position in Warriewood Road and above. They mention light glare shields on page 8 of the Obtrusive And Spill Lighting Report which will doubtless need to be installed.

There is mention in the report of curfew hours. But no mention of when those hours are, or even if Council will be implementing on this site. They mention 5 Lux lighting in curfew hours. Assuming the gates will be locked from 11pm till 5am, there is no mention if lighting will be on all night to dissuade theft from the depot. Full lighting or subdued lighting overnight has not been clarified.

### Parking

The proposal states parking for up to 48 buses of 12.5m length. However only 33 defined bus bays are shown on the plans. That's 33 buses in the day yet only 15 overnight. So where do the remaining buses park overnight? However the traffic report shows 31 buses (22+9) leaving the depot from 6am. Staff parking for only 10 cars is provided on site, yet the traffic report states 37 light vehicles (28+9) will arrive on site between 6am and 8am and 38 (19+19) will exit between 5pm and 7pm. Also the report states the number of staff and associated cars on site is less than 60 at any one time. Where are all these additional cars to be parked as there is limited on street parking. The plans indicate removal of four existing street parking spaces in Jubilee Avenue. Will Pittwater RSL be their convenient overflow parking area? Will surrounding factory unit parking spaces be taken before the factory staff arrive for work?

Also of interest drawing NGA-S2002-DWG-DA11 shows a plan view of buses of 12.5m, 14.5m and 18.0m long bendy buses. Why are these larger buses included in the plans? Why does the drawing show *"All bus parking for 12.5m unless noted otherwise"*? Are larger buses planned for this site? Clearly bendy buses will not negotiate this site as the flow diagrams show the 12.5m buses having to drive on the wrong side of the unbroken centre line upon exiting the site.

The fact that 31 outbound buses will leave the depot from 6am and drive onto the wrong side of the road over unbroken centre lines should cause concern to Council, Pharmicare, Blackmores and all local motorists.

### Traffic

The SECA Solutions traffic report appears flawed and contradictory.

Unfortunately this 20 page report fails to provide page or clause numbers for ease of reference.

The report states of the Ponderosa/Jubilee roundabout: *"The observations on site show that overall, this intersection operates well, with low delays and congestion"*. Their Table 2 Traffic Queues between 8am and 9am along Ponderosa south shows queues of only 24.3 metres. Any local will tell

you this road is banked back 500m to Forest Road between 8am and 9am. Clearly their observations were conveniently recorded during Covid closures. This is an extremely busy intersection with cars queued as far back as Forest Road to the south in the morning, back to Mona Vale Rd to the north and 250m back along Jubilee Ave West around 4:30pm onwards when businesses in Jubilee and Daydream St close. Most factories in the Valley commence work at 7am and finish at 5pm. Now according to the report an additional 68 vehicles are proposed from this depot each morning 6am to 8am and 60 vehicles each afternoon 5pm to 7pm. Jubilee Ave East experiences long traffic queues from Warriewood Road back all the way to Ponderosa between 5pm and 6pm. Entry and exit from this depot will incur lengthy delays at these times. The queue of cars trying to exit Blackmores and Pharmacare driveway (directly opposite this depot) each afternoon is testament to this.

Of Foley, Vineyard and Warriewood Roads the report states: *“All of these roads are located to the east of the site and effectively means that **all bus movements in and out of the proposed site would need to be from the west via the roundabout on Ponderosa Parade**”.*

However they also state:

*“The upgrade of Mona Vale Road and Follet (sic) Street has also been assessed and modelled by TfNSW as part of this road upgrade and shall have adequate capacity to cater for the potential traffic movements associated with the bus depot. The intersection of Foley Street and Jubilee Road has been reviewed on site and with relatively low traffic flows, this intersection operates well with minor delays and no congestion. The potential additional bus movements would have a minor impact upon the operation of this intersection, **noting that not all the bus movements in and out of the site would need to use this intersection**”.*

And again:

*“The major impact on road safety would be at the roundabout controlled intersection of Ponderosa Parade and Jubilee Avenue. This is a roundabout controlled intersection and currently accommodates the swept path movement of buses and semi-trailers. It is considered that the bus movements will not have an adverse impact upon road safety for vehicles in this location”.*

But their swept path diagram clearly shows a bus mounting the kerb and grass verge outside Pharmacare in order to turn right from Ponderosa. The report advises the roundabout at Ponderosa will not comfortably accommodate buses turning right returning to the Depot from the south: *“The Autoturn simulation confirms that the 12.5 metre long buses that will be operated by this site can be accommodated through this roundabout except for the right turn from Ponderosa Parade into Jubilee Avenue. **For a bus wishing to access the depot from the south via Ponderosa Parade, the bus would need to continue north to Mona Vale Road, turn right at the traffic signals and then turn right at Foley Street to then access the site via Jubilee Avenue.** This access routes will need to be discussed with Council to gain approval for using Foley Street. Whilst there is a weight limit, Foley Street is currently used by buses as part of regular bus services”.*

The Ponderosa roundabout has a central garden with sandstone surround which gets smashed regularly from trucks turning. The Traffic Report goes on to suggest all returning buses from the south are to drive onto Mona Vale Road, turn right into Foley St (3 tonne limit) and return to the depot from the east through the residential area. So the traffic plan appears to accept buses using the surrounding 3 tonne residential streets to the east.

So are we to conclude that the traffic report suggests Ponderosa roundabout should be the only access to the depot, but at the same time should it become too bothersome for the bus drivers they could enter and exit the depot from the Foley St end of Jubilee through residential streets.

## Fuel Depot

The refuelling of the 12,500L above ground fuel tank on site will require fuel tanker semi-trailers to visit site on a regular basis, perhaps daily. There is no mention of these vehicles or any restrictions on their movements in the DA documentation. Will a semi trailer be able to negotiate the entry/exit to this site, considering the roadway narrows significantly outside this site and the bus tracking

simulation shows buses driving on the wrong side of the unbroken line as they attempt to exit west from the site. The proposed entrance is directly opposite Blackmores semi trailer loading dock entry. Will the fuel tankers be restricted from using the 3 tonne residential streets to access the depot? Will they be refuelling the depot in the day or in the night as often happens at petrol stations? The positioning of the above ground fuel tank is only 6.5m from the road behind a single block wall and positioned directly behind an electricity substation which is mounted alongside the footpath at the base of a steep hill. Is this considered safe practice should a vehicle coming down the hill mount the kerb and collide with the substation and fuel tank? There appears to be no detail of bunding or diesel spillage pollution measures for this site. Narrabeen Creek has a tributary some 55m downhill from this proposed fuel tank. The nearest residence is only 30 metres away from the fuel tank.

### Conclusion

- The site appears too small for the proposed development.
- Additional traffic in Warriewood Valley especially at peak times is untenable.
- Insufficient parking for staff on site. Parking offsite will cause problems with neighbours.
- Access is compromised due to the narrow width of Jubilee Avenue and Ponderosa roundabout.
- Traffic Report assessment of Ponderosa Parade/Jubilee Avenue roundabout is erroneous.
- Acoustic Report relies on recommendations that cannot be upheld, invalidating their compliance.
- The Reports offer conflicting information as to vehicle numbers and proposed traffic movements.
- Nothing to prevent buses or fuel tankers using surrounding residential 3 tonne load limited streets.
- Noise and reversing alarms will impact the amenity of nearby residents.
- Lighting could adversely impact the amenity of surrounding residents all night.
- Insufficient detail of proposed security lighting.
- Fuel storage safety, pollution prevention, refuelling times, and tanker access is undocumented.
- Reports offer no consideration for residents in adjacent streets that look down onto the depot.

This is clearly not a suitable site for a bus depot. It has many shortcomings as have been pointed out. A larger site perhaps in Ingleside or Terry Hills should be sought to allow the bus company to operate at full capacity with the possibility of future expansion. Any future expansion of this site will require relocation.

Over the years Council has undertaken stringent controls to ensure the amenity of residents surrounding the Warriewood Valley Industrial Area is maintained with curfews currently in place with no out of hours work permitted. More recently Council imposed strict controls on Sunday morning food markets at Pittwater RSL to minimise the many noise and traffic complaints that they received from residents whose amenity was being compromised. It appears should this development be approved Council will be going against all the controls it has implemented for the Valley thus far.

Please lodge our objection to this inappropriate development proposal.

GR & CF Walsh  
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Warriewood NSW