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24 March 2020

Ms Louise Kerr
Director, Planning and Place
Northern Beaches Council

Via email: Daniel.Milliken@northernbeaches.nsw.gov.au

Dear Louise,

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - DA2019/1190

1. INTRODUCTION

We write to you on behalf of the Manly Warringah Sea Eagles (**MWSE**) as the applicant to DA2019/1190 which seeks consent for the construction of a new grandstand and centre of excellence (**COE**) on the northern end of Brookvale Oval, located on Pittwater Road, Brookvale.

The purpose of this letter is to respond to the request for additional information received from Northern Beaches Council (**the Council**) on the 31 January 2020. The letter provides a detailed justification for the proposed location of the development, in conjunction with responses to all points raised by the Council.

We note at the time of writing that comments from Council's Transport Team, and NSW Police remain outstanding. Further, comments received from Council's Waste team have had clarification sought, to which no response has yet been received.

The following plans and reports have been prepared to address the matters raised by Council's Referral Departments as well as the Public Submissions:

- Amended Architectural Plans prepared by Hassell Architects (**Appendix A**)
- Clarification Documentation Pack prepared by Hassell Architects (**Appendix B**)
- Amended Landscape Plan prepared by Hassell Architects (**Appendix C**)
- Amended Preliminary Construction Environmental Management Plan prepared by SLR (**Appendix D**)
- Amended Heritage Impact Assessment prepared by Urbis (**Appendix E**)
- DRAINS model detail prepared by TTW (**Appendix F**)



2. RESPONSE TO COUNCIL MATTERS

2.1. PROPOSED FACILITY LOCATION

The proposed functional area design and location of the Centre of Excellence (CoE) and seating bowl has been informed from several key considerations which are summarised below.

2.1.1. Funding Requirements

- Existing funding agreements provide development constraints that must be incorporated into the project:
 - **Federal Government:** \$12.5M in funding specifically allocated to the provision of a 3,000 seat covered grandstand.
 - **NSW Government:** \$20M in funding provided from the Centres of Excellence funding program to address the following objectives:
 - **Elite Performance:** World-leading training infrastructure that enables clubs to build, attract and retain the best talent among players, coaches, executive and support staff.
 - **Talent/Youth Development:** Programs that identify and develop future elite players.
 - **Community Engagement:** Highly utilised facilities with access for local communities, schools, sporting clubs and other community groups.
 - **Multi-Purpose Use:** Opportunities for multi-purpose and community access to the facility.
 - **Sustainable Business Model:** The facility supports the financial growth of the NSW NRL Club.

The funding provided for the project is the key driver in the delivery of the proposal. While the funding was sourced to deliver separate components of the proposal, there were clear structural efficiencies in the colocation of the CoE and the covered seating bowl. The cost associated with the construction of the stand and seating bowl separated from the CoE building results in substantial inefficiencies in construction costs. The cantilevered roof requires substantial structural support to enable adequate coverage of the 3,000 seats, as does the delivery of the seating bowl structure itself. Colocation of these elements built in conjunction with the CoE enables cost efficiencies to deliver an overall improved facility.

2.1.2. The Building Brief

The total building required in the brief is 3,600sqm. The primary building programs are consolidated into seven functional group areas, being:

- Gym and training
- Coaching and football offices
- Change rooms
- Meeting and social spaces
- Rehabilitation and recovery
- Administration offices

- Community Flexible Room

These functional groups are then arranged for optimum functional adjacencies vertically and horizontally. The 'social space' is centred with the primary vertical circulation which is both the entry/arrival point and brings all the groups together. The change rooms are centred between gym/training and rehab/recovery for optimal operational circulation.

The overall size of the 3,000 seat grandstand is defined by the width of the pitch, and therefore the length of the building matches the width of the grandstand to optimise the sharing of the super structure to support the cantilevered roof over the seats.

Future stage seating tiers are able to be extended around the entire pitch using the same geometry.

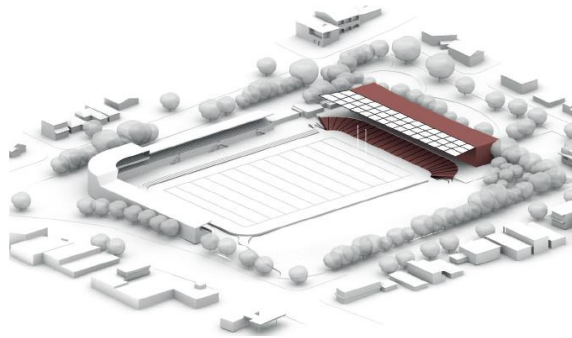
2.1.3. Future Master Plan

The CoE forms part of a Staged Strategy mindful of a planned longer term redevelopment and upgrade of the entire Brookvale Oval that will occur over time. Location of the CoE to the north future-proofs this longer term plan for Brookvale Oval to achieve desired 20,000 seats.

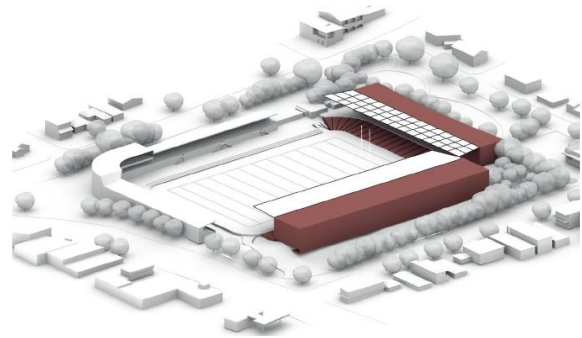
- The National Rugby League (**NRL**) is committed to upgrading suburban grounds, in a strategic move to strengthen local club supporter bases. Brookvale Oval has been identified by the NRL as the priority grounds for the development of a 15,000–20,000 seat stadium.
- In order to facilitate further State and Federal Government investment for future development stages, the NRL and the Club will need to be able to prove that Brookvale Oval is capable of meeting capacity within a 'best-practice' stadium environment.
- The prime seating locations are along the eastern and western sides of rugby league grounds. Accordingly, some 7,000 seats will be required on the eastern side of the field. Placing the CoE on this side would prevent achieving the seating required to meet the future target ground capacity.

Extensive testing of locational options for the CoE facility has been carried out by Hassell and is included at **Appendix B**. The work also includes a masterplan strategy outlining a staged overview of the future intended redevelopment of the site. This is reflected in **Figure 1** below.

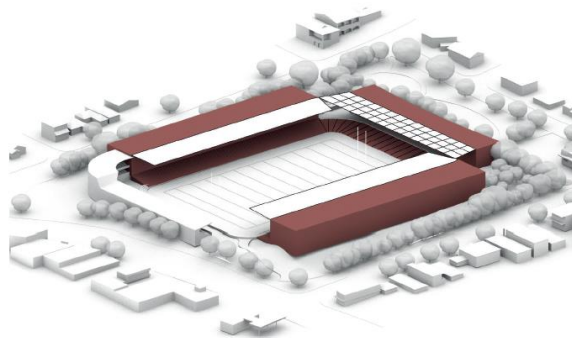
Figure 1 Intended Staging of Upgrade Works



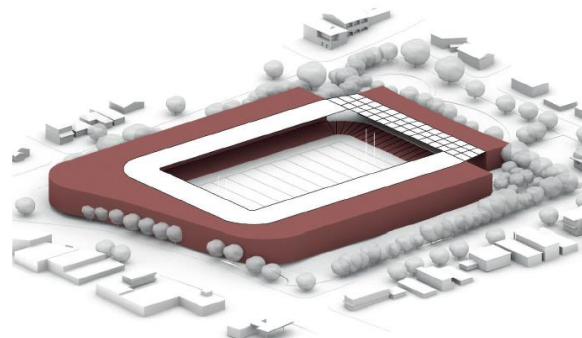
01 Stage 1 - Centre of excellence and northern grandstand



02 Future Stage 2 - Redevelopment of the eastern hill into grandstand



03 Future Stage 3 or 4 - Redevelopment of the western stand



04 Future Stage 3 or 4 - Redevelopment of the southern stand

Source: Hassell

2.1.4. Master Plan Strategy

The overall masterplan vision for Brookvale Oval is to enable a total of 20,000 seats. The strategy included at Appendix B demonstrates that the geometry of the North-Stand & CoE has been developed so it can be replicated around the entire field in stages. The seating tier and concourse can be extended around the entire field which will deliver 13,000 seats and a continuous accessible concourse around the entire venue. The upper tiers in the East and West stands will deliver 3,500 seats each to deliver 20,000 seats in total for the venue

If the CoE were to be located on the east it would not allow for the future 2 tier seating arrangement limiting the overall future capacity of the venue to under 20,000 seats.

2.1.5. Site Planning Principles

Site planning principles for stadium and training facility developments indicate that the ends of a rugby league facility are most suitable for a CoE. This is because:

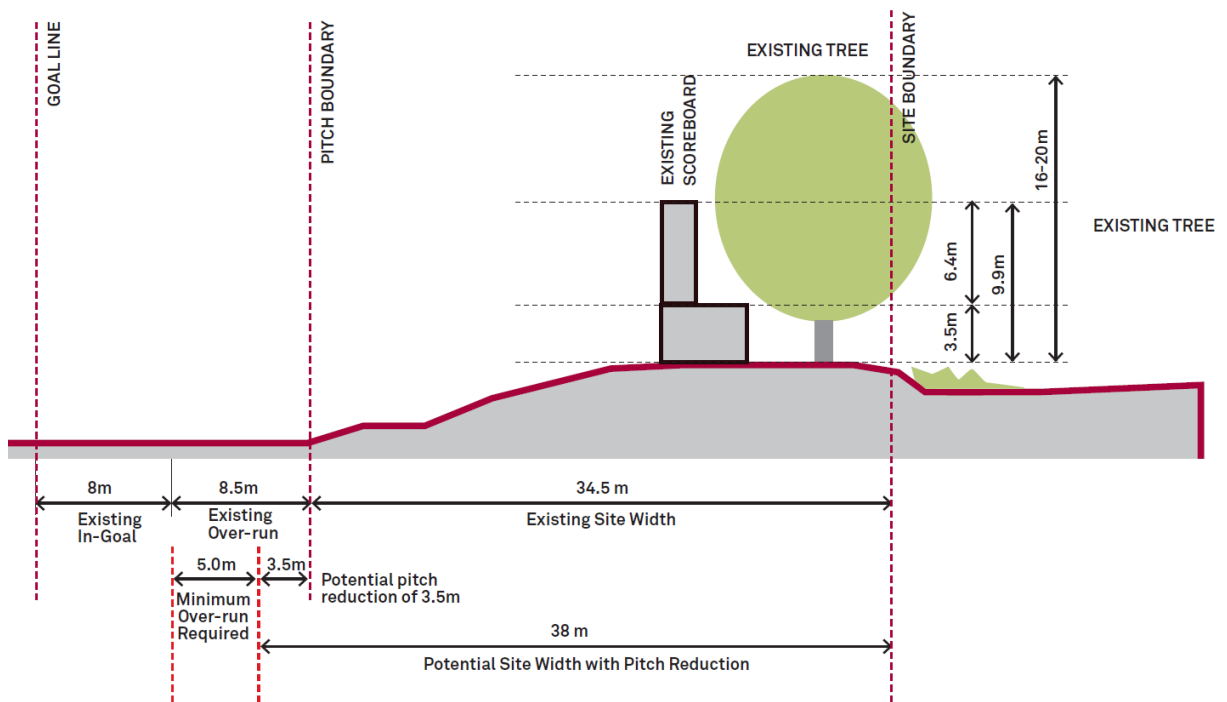
- Locating the CoE at the Northern end enables utilisation of the less valuable land from a Club sustainability perspective.
- Sideline tickets (along east or western sides of Brookvale Oval) are premium for any rectangular sport (including rugby league) due to the view that is provided across the entire field. Further,

seating is typically reserved for club members, who pay a significant annual fee for such seats. Optimising seating on these sides is therefore critical.

2.1.6. Test Fit Studies

Several test fit studies were undertaken by the design team, to ensure the optimal design outcome was achieved on the northern end of the stadium. These have been based off the existing critical site section dimensions. The studies sought to ensure the building dimensions and specific location responded appropriately to the existing site features and limitations. These studies have been detailed at **Appendix B** and demonstrate that the final design is the most optimal outcome for the site.

Figure 2 Existing Critical Site Section Dimensions



Source: Hassell

2.2. OTHER MATTERS

A response to all other matters raised by Council are included in **Table 1** below.

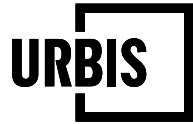
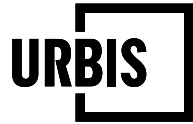
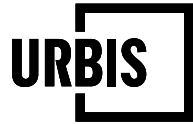


Table 1 Response to Council Items

Item	Response
Heritage Items	
<p><i>The trees are part of a listed heritage item. It is noted that Brookvale Park / Oval has evolved over time. It is also noted that the heritage report recommends mitigating measures, such as replacement tree planting (four in the avenue of trees and seven in the north-eastern corner of the oval), involving local school children in the replanting program, and reusing the wood from the removed trees as features. However, the justification for the location of the development (northern hill as opposed to the eastern hill) is insufficient to permit the removal of the heritage listed trees.</i></p>	<p>Refer to Section 2.1 above for justification on the location.</p> <p>An updated Heritage Impact Assessment (HIS) is included at Appendix E.</p> <p>Refer to Section 2.1 above for justification on the location.</p> <p>An updated Heritage Impact Assessment (HIS) is included at Appendix E.</p>
<p><i>Adjoining the oval to the north is the “village green”. The loss of the trees and the proximity of the centre of excellence (due to its bulk and scale) will reduce the amenity of the public open space. These concerns have been raised in referral comments from Council’s Heritage, Landscape and Parks/Reserves officers. They were also raised during pre-lodgement discussions with the applicant. Taken together, these impacts are significant and determinative in the absence of credible justification as to why the building needs to be located north of the oval and cannot be sited to the east of the oval where it would not have the negative impacts listed above.</i></p>	<p>The offset approach for replanting has been revised based on discussions with Council, and the relevant specialists in the project team. The approach detailed at Appendix C seeks to plant 15 Banksia Aemula (Wallum Banksia) + Callistemon Citrinus (Red Bottlebrush) at 6-7.5m centres located within the existing and new garden bed to the north of the new CoE site. This new plan would re-establish the strong linear vegetation boarder that frames and buffers the oval from views from the north.</p>
<p><i>It should also be noted that clause 10(3) of SEPP (Vegetation in Non-Rural Areas) 2017 requires the consent authority to be satisfied that “the proposed activity is of a minor nature” and “would not adversely affect the heritage significance of the heritage item”.</i></p> <p><i>SEPP extract below -</i></p> <p><i>10 Council may issue permit for clearing of vegetation</i></p>	<p>The proposal does not adversely affect the heritage significance of the heritage item, by virtue of the revised and improved offset approach, and in the specific context of the development. Refer to the updated HIS at Appendix E, and updated offset approach at Appendix C.</p> <p>Accordingly, the proposed tree removal remains permissible.</p>



Item	Response
<p>(1) A council may issue a permit to a landholder to clear vegetation to which this Part applies in any non-rural area of the State.</p> <p>(2) A permit cannot be granted to clear native vegetation in any non-rural area of the State that exceeds the biodiversity offsets scheme threshold.</p> <p>(3) A permit under this Part cannot allow the clearing of vegetation—</p> <p>(a) that is or forms part of a heritage item or that is within a heritage conservation area, or</p> <p>(b) that is or forms part of an Aboriginal object or that is within an Aboriginal place of heritage significance, unless the council is satisfied that the proposed activity—</p> <p>(c) is of a minor nature or is for the maintenance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or heritage conservation area, and</p> <p>(d) would not adversely affect the heritage significance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or heritage conservation area.</p> <p>(4) A permit may be granted under this Part subject to any conditions specified in the permit.</p>	
Heritage – Detailed	
<p><i>The proposal seeks consent for the construction of a new grandstand and centre of excellence on the northern edge of Brookvale Oval. The proposal includes the removal of 11 heritage listed brush box trees, and proposes to replace them with 7 brush boxes and 4 tuckeroos.</i></p> <p><i>The brush boxes are large trees that form part of the defined formal planting line around 3 sides of Brookvale Oval along with the Camphor Laurels. The trees are both of heritage significance and visual significance due to their size and important canopy coverage in an area of known low coverage. The heritage significance of the trees is enhanced by the easily read and defined planting line. Gaps in the northern line are noticeable, but they do not</i></p>	<p>A detailed justification for the location of the proposal has been provided at Section 2.1 above.</p> <p>An updated offset approach has been provided in line with advice sought from council, which implements a reinforcement of the linear planting in conjunction with the proposal CoE building. Refer to the updated offset approach at Appendix C.</p> <p>An updated HIS has been provided Appendix E, which concludes that the ticket booths are of no heritage value. Further, a detailed Arboricultural assessment was provided with</p>



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interrupt the legibility of the line or its significance, nor do they justify the removal of the remaining trees.

Photographic evidence from the Mayne-Wilson & Associates' Heritage Report on Brookvale Park (2005) indicates that the gaps in northern line are apparent by 1933 (pg 14) and are most likely deliberate due to existing buildings or for access purposes. The aerial photo from 1951 (pg 17) reinforces that these gaps have been established on the site for decades. It is further noted that the northern planting line shows the historical extent of Brookvale Park before the resumption of Federal Parade and its shift to the north. This provides physical evidence of the development and enlargement of the broader park over time.

The heritage significance and importance of these trees cannot be understated. While the park has been used for recreational purposes since 1911, over time its focus and facilities have changed. However, as noted in the 2005 report, 'The only fabric of heritage significance are the cultural plantings (mostly Brush Box trees around the eastern and western boundaries of the park, and along the northern boundaries of the rugby field'. As the only remaining fabric of heritage significance, all efforts must be made to ensure their retention and protection.

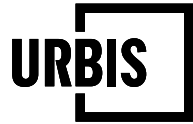
Turning to the proposed tree replacement planting option, it is considered to be a poor attempt to offset the loss of the heritage significant trees and is not acceptable. The proposed location of the 7 new brush boxes is impacted and constricted by the pedestrian ramp/access area and proposed sewerage and stormwater lines. The trees would never be able to grow to a sufficient size to match the existing trees proposed for removal. Additionally these trees are located behind a retained group of brush boxes and would not contribute to the re-establishment of the defined formal planting line. Further, these plantings would likely be removed by any future development of the eastern grandstand.

The 4 tuckeroos proposed for in the Village Green would also not grow to a sufficient size to match the brush boxes, nor would they contribute to the important defined heritage tree line.

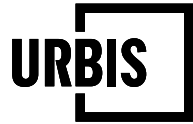
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the original DA and noted that stormwater diversion would not impact on additional heritage listed trees.

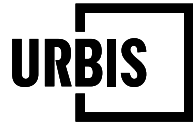
The parking allocation along Alfred Road has been amended and extended as suggested by Council to remove any possibility of damage to the existing linear planting of trees.



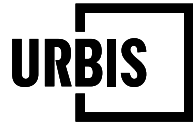
Item	Response
<p><i>A 'one for one' approach is also not acceptable for the replacement of heritage significant and visually important trees, given potential losses while trees establish themselves.</i></p> <p><i>The proposal has also not considered key actions of the Brookvale Oval Plan of Management 2002 (PoM). The plan catered for eventual development of the eastern and northern stands, however Action 53 specifically requires investigation and justification for their development, and for this to be provided in any development application. There has been no consideration of the eastern end in the proposal. Given the larger width and length of the eastern side, it would be considered possible to accommodate all the desired facilities on this side without having to remove any of the heritage trees in this area along Pine Street.</i></p> <p><i>It is considered that there is the potential to further explore additional design options that retain the heritage listed trees. This could include the construction of a basement level on the northern side, reallocation of spaces and a shrinking of the building width. An option exploring a reduction in the size of the area behind the dead ball line on the southern end and shifting the entire field down should also be considered. It is noted that the proposal has already included this for the northern end and adopting a similar approach on the southern end would give additional space to construct the grandstand and retain the heritage listed trees.</i></p> <p><i>There are also some further actions in the PoM that have not been addressed including:</i></p> <ul style="list-style-type: none"><i>• Action 47 to investigate the heritage significance of the two northern ticket booths</i><i>• Action 75 to retain mature trees on Alfred Street, Pine Street and Federal Parade.</i> <p><i>Concerns are also raised in relation to the proposed stormwater and sewerage piping lines. Heritage would suggest that the proposed lines be amended to exit the site between trees 59 and 60 on the Pine Street frontage, given the larger gap here between plantings.</i></p>	



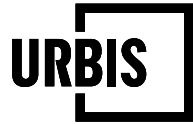
Item	Response
<p><i>The proposed concrete ramp on the eastern end of the northern grandstand is also likely to heavily impact upon the structural root zone of tree 35, as will the proposed waste storage area. The proposed construction method for pier and beam construction as detailed in the arborist report is considered unlikely to be feasible in this area given the proposed concrete ramp. The design approach in this area should be reviewed to minimize impacts upon tree 35. Additionally, the proposed waste storage area should be moved to minimize impacts upon trees 35 and 34.</i></p> <p><i>The design of the additional 18 car parking spaces on Alfred Road should also be revised to minimize impacts upon the heritage trees. The outward facing spaces should be removed. Any parking loss can be compensated by extending the car park to the north along the fence line.</i></p> <p><i>Heritage does not object to the external design or presentation of the northern grandstand, only its location.</i></p> <p><i>However, Heritage cannot support the proposal given the impact of the loss of the trees on the heritage significance of the overall item, the inadequacy of the tree replacement plan and the failure to address key actions of the Brookvale Oval Plan of Management 2002.</i></p> <p><i>There are potential design solutions that should be furthered explored that will allow for the construction of the required facilities while still retaining the heritage significant trees, such as construction on the eastern end of the field.</i></p>	
Development Engineers	
<p><i>The following comments have been provided:</i></p> <ol style="list-style-type: none"><i>Provision of On Site Stormwater Detention and Design documentation.</i>	<p>All these matters have been responded to and are included below:</p> <ul style="list-style-type: none">Refer to the attached DRAINS model at Appendix F which represents overland flow study that was completed, which



Item	Response
<p>a) <i>As required by clause 3.3 a Drains model has not been submitted for Councils review. Summary information regarding the OSD design has not been presented as detailed in appendix 9.</i></p> <p>b) <i>The minimum information as required by section 3.3 has not been provided.</i></p> <p>2. <i>Proposed Council stormwater line diversion</i></p> <p>a) <i>The proposed grandstand is located over Council stormwater infrastructure being a 600mm pipe.</i></p>	<p>demonstrates that the diversion is accordance with Council's Water Management Policy and Section 6.</p> <ul style="list-style-type: none">• Technical Director - Stephen Brain is registered on the NER.• Council's stormwater system caters for the 100 year ARI event through piped capacity and overland flow capacity. The proposed system maintains the capacity of the existing system without worsening the existing stormwater condition. The overland flow hazard is safe for all public paths and areas but for the grassed which is not intended for public access.• As the grass swale is 1.5m wide and 0.6m deep at the invert, this allows the minimum 500mm freeboard to be achieved. Refer to DRAINS model.• Our Drains analysis and assessment is in accordance with the requirements of Australian Rainfall and runoff.• There are no increases to overland flow levels upstream or downstream of the development. Refer to DRAINS model which shows the overland flow path levels being the same as the existing levels
<p><i>Council advised in the pre lodgement notes that the stormwater drainage lines can be re diverted around the proposed grandstand development however the following information which is also required has not been submitted:</i></p> <ol style="list-style-type: none"><i>1. The applicant is to provide an overland flow study to demonstrate that the diverted and upgraded stormwater line is in accordance with councils Water Management policy PL850 and Section 6 Building over or adjacent to Council Systems and easements.</i><i>2. The hydrological and hydraulic study is to be prepared by a Civil Engineer registered on the National Engineers register (NER) . The preferred Council model is DRAINS.</i><i>3. Councils piped drainage system is to cater for all storms up in excess of the 1 in 20 year AEP up to and including the 1 in 100 year AEP. Any overland flow paths are to have safe velocity versus depth ratios in accordance with Australian rainfall and runoff.</i><i>4. Demonstration that all habitable floor levels are to have a minimum 500mm freeboard above the adjoining 100 year flow path top water levels.</i>	<p>Yes, the 600mm diameter stormwater diversion pipe is proposed to be a class '2' reinforced concrete pipe.</p>



Item	Response
<p>5. <i>Hydraulic and Hydrological parameters are to be in accordance with the requirements of Auspec One D5 Stormwater Drainage Design are to be used in the preparation of the Hydraulic design plans and report.</i></p> <p>6. <i>There is to be no increases to overland flows levels upstream and downstream of the development in all storm events up to and including the 1 in 100 year ARI.</i></p> <p><i>The proposed new stormwater line is to be a reinforced concrete pipe to take the superimposed design service loads.</i></p>	
Landscaping	
<p><i>The plans indicate removal of a row of eleven significant Lophostemon conferta (Brush Box Trees) long the northern end of Brookvale Oval. The trees form part of a listed Item of Environmental Heritage in Warringah LEP 2011.</i></p> <p><i>The only reason for removal of the trees is to construct the proposed building. Alternate designs should be sought that enables retention of the trees.</i></p> <p><i>In view of the status afforded them by WLEP2011, the trees should be a significant design constraint on any development proposed.</i></p> <p><i>Further impacts on three additional listed L.conferta trees, Trees 47, 48 and 49 (as identified in the Arborist's Report) caused by the need to excavate for a new stormwater drainage diversion. construction of retaining walls and bioretention swale are of concern. Drawings SKC05 - Storm Water and Site Works Concept Plan and SKC15 - Bulk Earthwork Plan prepared by TTW also indicate significant works around the Tree Protection Zone of these trees on the eastern side of the building and Tree 35 on the western side of the building. The combined impacts on these trees is considered likely to adversely affect their retention.</i></p>	<p>Alternate designs and locations have been detailed in Section 2.1 above. The assessment has concluded that the location proposed is the only viable location for the development.</p> <p>To enhance the tree protection measures already outlined in the Tree Management Plan (Section 4) of the Arborist's report and reduce council concerns, the project arborist also recommends:</p> <ul style="list-style-type: none"> • The addition of mulch and irrigation, this ensures the remaining root system has access to water and nutrients throughout construction. • Administer a trunk injection of STEMIX PLUS before construction commences. The micro-injection technique is designed to promote new foliar, cambial and root growth to combat the root loss.



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Concern is also raised regarding tree 24 and 25 on the Alfred Road side of the existing toilet block which appear to be removed on the Drawing A_0400 Site Plan prepared by Hassell and Drawing CS100 - Combined Services Site Plan prepared by LCI Consultants to accommodate proposed Authority water meter, Authority gas meter and fire hydrant booster assembly for the Centre of Excellence. Trees 74 and 75 Cinnamomum camphora (Camphor Laurel Trees) on the Pine Avenue side of the ground appear significantly affected by the new sewer line required for the Centre of Excellence as indicated on Drawing CS100 - Combined Services Site Plan prepared by LCI Consultants

The removal of and high potential for damage to the listed trees as significant Cultural Landscape items is not supported.

Further, the proposal to remove the trees does not appear permissible under Part 3 Clause 10 of the State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 which states (emphasis added):

Part 3 Clause 10

10 Council may issue permit for clearing of vegetation

(3) A permit under this Part cannot allow the clearing of vegetation—

(a) that is or forms part of a heritage item or that is within a heritage conservation area, or

(b) that is or forms part of an Aboriginal object or that is within an Aboriginal place of heritage significance,

unless the council is satisfied that the proposed activity—

(c) is of a minor nature or is for the maintenance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or heritage conservation area, and

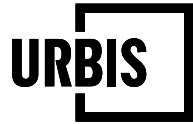
(d) would not adversely affect the heritage significance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or heritage conservation area.

Response

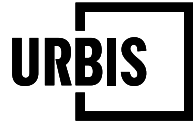
Tree 74 and 75: As per the Arborist report Under-boring or directional drilling is recommended to retain trees 72, 74 and 75. If done correctly this will reduce the impact to zero.

We confirm these trees 24 and 25 are not intended to be demolished and have been inadvertently missed on the two noted site plans. We have included an updated site-plans (A_400 & CS_100) to capture these two trees.

Reference to the permissibility of tree removal has been dealt with above.



Item	Response
<p><i>The proposed replanting of some trees within the site and adjoining parkland is not considered suitable to compensate for the loss of the trees proposed and the locations indicated bear no resemblance to the existing formal avenue planting that would be removed. The proposed locations, particularly those in the narrow area between the ramp structure on the eastern side, are not likely to enable growth to maturity.</i></p>	
<p>Parks and Reserves</p>	
<p><i>Further information and clarification on the following items is required:</i></p> <p><i>Construction Management Plan specific for this development including construction access, storage facilities and deliveries that also graphically represents construction activity zones and movements. No construction activity is supported within the northern area of the Brookvale Park, that contains the day care facility, children's playground, parkland, outdoor gym and vegetation. Construction activity shall be excluded from utilising the northern area of the Brookvale Park along Federal Parade and shall be limited to the existing footprint areas of Brookvale Oval, including the surface area,</i></p> <p><i>Management and Maintenance Program for the grass playing surface, with particular attention to the management of grass subjected to shade during the mid-winter period from the proposed building and roof shadows,</i></p> <p><i>Clarification on the radiant heat levels and impact from the translucent roof to the grass areas of the playing field, and confirmation that the product selected will deflect/absorb near-infrared radiation.</i></p> <p><i>It is unclear if the translucent roof material will deflect the heat from spectators and the grass, or otherwise due to product selection and/or the distance between the glass and the playing surface. Clarification is required on the material used for the cantilevered roof, in terms of its</i></p>	<p>An updated Preliminary Construction Environmental Management Plan has been included at Appendix D. The plan has specifically provided clarity on the matters requested by Council.</p> <p>Further information on the proposed translucent roof is provided below:</p> <ul style="list-style-type: none"> ▪ Current Spec: 1mm Clear Marlon Polycarbonate ▪ Visible light transmissions: 89.5% ▪ UV Transmission: 0.0% ▪ Reflection: 09.7% ▪ Impact on turf: Council is requested to consult with 'Green Solutions' who are currently working on the field to review specification data. ▪ Impact on spectators: No additional UV impact is expected from the translucent roofing material. Note that the



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radiate heat impact to the grass playing surface. The documents provide a shadow analysis generated from the building mass and structural roof elements only.

Of concern is the lack of information surrounding the construction methodology. The Construction Management Plan does not indicate if construction activity will be contained within Brookvale Oval (existing field and embankment hills), or are to include open space park areas of Brookvale Park, which are utilised year round by the public. The loss of public access to the park areas is not supported, and the existing day care facility, children's playground, parkland, and outdoor gym must be available to the public to the extent it is now available. The stated introduction of loading vehicles to the northern concourse area of the proposed grandstand during a non-game day, creates a potential conflict with pedestrian access and general park use by the public.

Appendix L: Preliminary Construction Environmental Management Plan is generic and not specific to the works program proposed, with notes such as "to be completed post DA consent prior to construction" and "Note: a detailed construction site access route will be completed post DA consent, prior to construction" not acceptable. It is not known if construction plant, sheds, materials, deliveries will impact upon park recreational assets. The Appendix L report is silent on this and further information is required to ensure the recreational amenity of the Park is protected during any works.

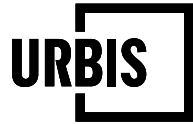
The existing group of mature Brushbox trees proposed for removal as part of the development are a valuable park asset that contribute to the amenity of the northern area of Brookvale Park, offering visual and physical separation between adjoining residential lands and Brookvale Oval. This asset can't be replaced in the short term, and any proposed tree replacement will take in the order of at least 50 years, if not more, to achieve a similar visual and physical presence.

The park asset amenity value to the community, as a 'village green' is reduced with the loss of such mature trees, that currently offers a visual and physical segregation between varying

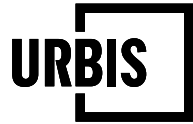
Response

specification data sheet provides; ISO9050 AMI1.5: Skin Damage: 00.9%

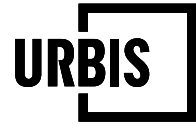
Updated offset strategy with justification for location has been detailed in the above sections.



Item	Response
<p><i>recreational land uses, with the passive recreation of the Park within the northern area separated from the active recreation of the Oval. The northern portion of the Park contains various community assets such the Day Care, and recreational activity such as the children's playground, outdoor gym area, parkland and pedestrian access throughout.</i></p> <p><i>The compensatory planting does not reinstate the value of row planting, diminishing the heritage value of the existing row planting to three sides of Brookvale Park, and thus diminishing the park amenity for the community. The proposal seeks to offset the loss with compensatory planting to reinforce the existing linear planting along the northern part of the site and norther eastern corner. However the linear planting is proposed as Tuckeroo trees, extending the row of existing Tuckeroos, with Brushbox trees proposed at the north east corner of the site. This arrangement removes the connected heritage row planting of Brushbox trees to the east, north and west of Brookvale Park.</i></p> <p><i>It is considered that in term of park assets, relocation of such a proposal to the eastern hill limits any impact to recreational use of Brookvale Park, with minimal impact to public passive recreational land. The eastern hill is unlikely to result in tree loss and currently exists with limited public passive recreation value, with the portion of land between the eastern embankment and Pine Avenue offering pedestrian access through this portion, without any other existing recreational value.</i></p>	
<i>Urban Design</i>	
<p><i>The applicant should address the following issues:</i></p> <ol style="list-style-type: none"><i>1. The feasibility study provided does not consider the eastern side hill slope seating section of the site as a logical location for the new proposal – where cutting down of 11 mature heritage trees and encroachment into the football pitch area will not be an</i>	<p>A detailed explanation and justification of the is provided above in Section 2.1 and the attached report by Hassell in Appendix B.</p>



Item	Response
<p><i>issue as the eastern side area is wider and longer than the northern side. Both sides have been identified by the management plan as sites for future developments.</i></p> <p>2. <i>The community benefits delivered by locating the grandstand on the eastern side far outweighs the northern side:</i></p> <p>a) <i>As a football game viewing position, the eastern side grandstand will be a better vantage location.</i></p> <p>b) <i>It is also closer to Pittwater Road which is the main transport corridor for public access and egress.</i></p> <p>c) <i>It will also have minimal impact on the village green which is a highly used community space.</i></p> <p>d) <i>Mature trees will not have to be cut down thereby reducing the existing tree canopy coverage required to reduce urban heat island effect. Brookvale is already considered having a low tree canopy coverage currently being an industrial area.</i></p> <p><i>The proposed built form can generally be supported with the planning layout and proposed material finishes but not in the current location.</i></p>	
<p>Waste and Regulatory Services</p>	
<p><i>Waste storage room design</i></p> <ul style="list-style-type: none"> ▪ Require a bin layout plan showing the required number of bins. ▪ Show doors with dimension- minimum width is 1200mm ▪ Pathway to collection point to waste store room. Pathway width is minimum 1200mm and 6.5m in distance. 	<p>A Waste Management Plan was prepared and submitted with the original DA documentation.</p> <p>The plan provided detail on the operational requirements (noting again that capacity will not increase at the grounds on game day), as well as making recommendations for bin numbers and storage in line with Council requirements.</p>



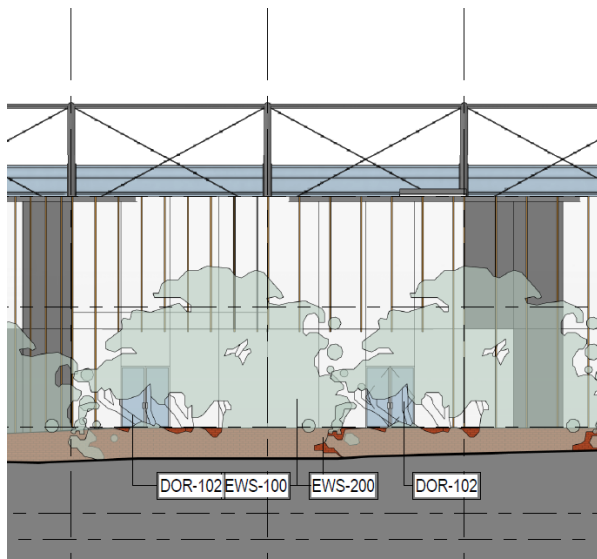
Item	Response
<ul style="list-style-type: none">▪ <i>Gradient of path is 1: 8</i> <p><i>Anticipated bins numbers for the projected waste figures as detailed in the SEE are:</i></p> <ul style="list-style-type: none">▪ Ideally we need more information on proposed events and activities in the centre as these may generate significant amounts of waste. Number of bins may increase or frequency of service.▪ Red general waste bins= 4 x 660L or 11 x 240L bins▪ Blue Paper recycling bins = 4x 240L bins▪ Yellow Container recycling bins= 3x 240L bins▪ Total is 18 x 240L bins 7x 240L and 4x 660L bins <p><i>A commercial waste service is required. The size of bins will be dependent on contractor. Best to allow for 240L in regard to bin storage area.</i></p>	<p>Further, the architectural plans show a bin storage area to meet requirements of the outcomes of the waste management plan.</p>

3. PLAN UPDATES

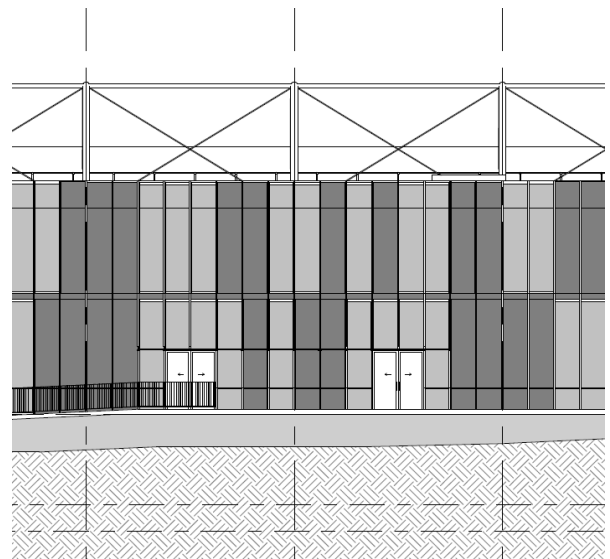
Minor changes have resulted due to advanced detail design of the project. While the changes are small, a summary of the updates is included below:

- Amount of glazing on north façade at entry lobby reduced, as shown in **Figure 3** below.

Figure 3 Glazing Updates



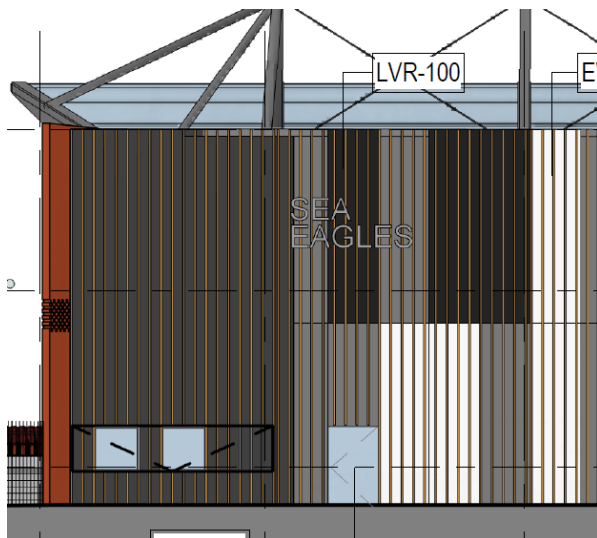
Source: Hassell



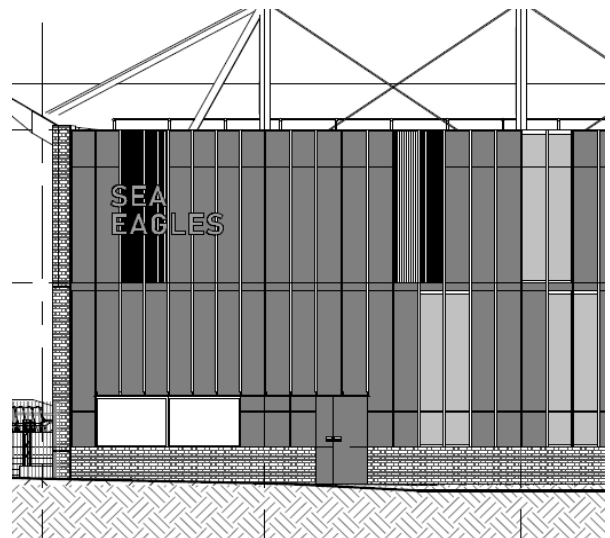
Source: Hassell

- Density and set-out of vertical battens updated and reduced along the northern facade, particularly towards the ends of the building. This is shown below in **Figure 4**.

Figure 4 Vertical battens updated



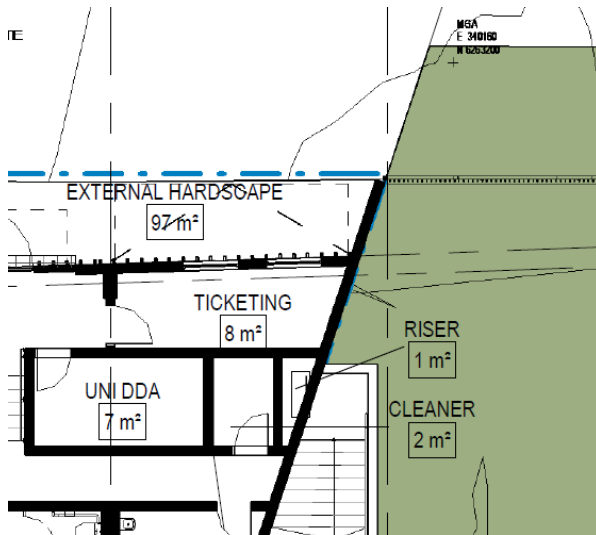
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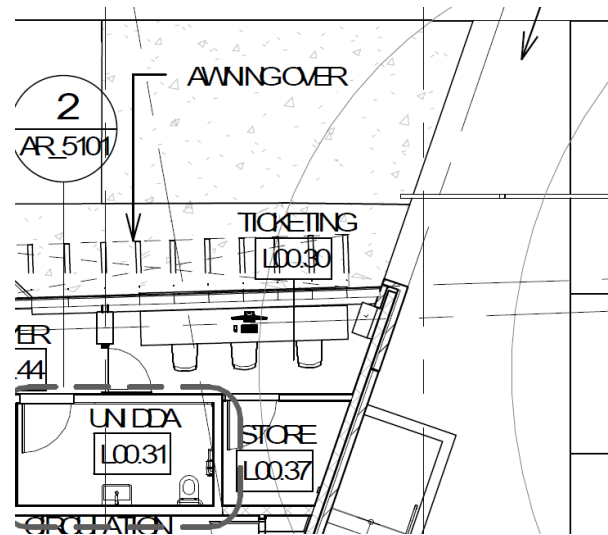
Source: Hassell

- Protruding brick wing walls in north-east and north-west corners removed, shown below in **Figure 5**.

Figure 5 Protruding brick wings removed (updated plan on the right)



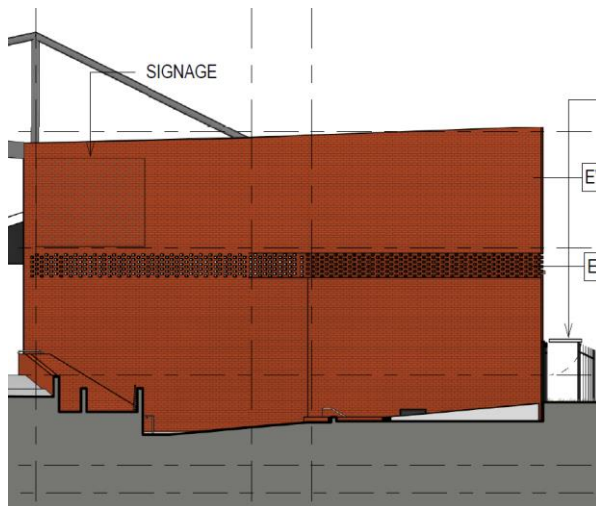
Source: Hassell



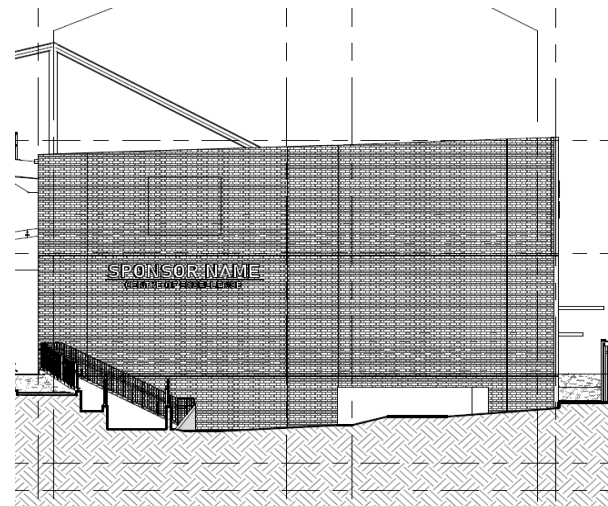
Source: Hassell

- Hit-and-Miss brickwork on east and west facades removed, shown below in **Figure 6**.

Figure 6 Brickwork updated (east shown)



Source: Hassell



Source: Hassell

- Minor changes have resulted to the Lower Ground level. These include:
 - Players tunnel resolution due to the foundation’s design refinement.
 - Pump and Pool plant area updated to simplify planning and retaining walls.



- Stair 6 location updated to simplify planning and retaining wall engineering.
- OSD tank relocated to east of building to remove from under building to simply construction of tank and building foundations.

Accordingly, a revised drawing set has been included at **Appendix A**.

4. CONCLUSION

We trust that the information contained within this letter and in the accompanying appendices adequately responds to the matters raised by Council and responds to the key issues raised by the community during the public exhibition of the proposal.

Should you wish to discuss further, please do not hesitate to contact the undersigned on (02) 8233 7697.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Andrew Hobbs". The signature is fluid and cursive.

Andrew Hobbs
Senior Consultant
+61 2 8233 7697
ahobbs@urbis.com.au



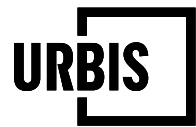
APPENDIX A

ARCHITECTURAL PLANS



APPENDIX B

CLARIFICATION DOCUMENTATION PACK



APPENDIX C

AMENDED LANDSCAPE PLAN



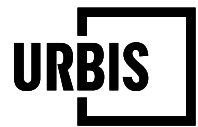
APPENDIX D

AMENDED PRELIMINARY CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN



APPENDIX E

AMENDED HERITAGE IMPACT ASSESSMENT



APPENDIX F

DRAINS MODEL