

Brookvale Structure Plan Consultation Outcomes Report

Prepared on behalf of Northern Beaches Council



Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

By using the green and blue colours to represent NSW, this painting unites the contrasting landscapes. The use of green symbolises tranquillity and health. The colour cyan, a greenish-blue, sparks feelings of calmness and reminds us of the importance of nature, while various shades of blue hues denote emotions of new beginnings and growth. The use of emerald green in this image speaks of place as a fluid moving topography of rhythmical connection, echoed by densely layered patterning and symbolic shapes which project the hypnotic vibrations of the earth, waterways and skies.

Contact	David Attwood Associate Director		
Version No.	Date of issue	Prepared By	Approved by
1.0 (DRAFT)	19/07/2023	ZC/DA	DA
2.0 (FINAL)	26/09/2023	DA	DA

Reproduction of this document or any part thereof is not permitted without written permission of Ethos Urban Pty Ltd. Ethos Urban operates under a Quality Management System. This report has been prepared and reviewed in accordance with that system. If the report is not signed, it is a preliminary draft.

Contents

1.0	Introduction.....	4
1.1	Engagement approach	4
2.0	Summary of submissions	6
2.1	Who responded	6
2.2	Analysis of submissions	7
3.0	Response to key matters raised.....	9
3.1	Transport	9
3.1.1	Traffic congestion	9
3.1.2	Public transport	11
3.1.3	Car parking.....	12
3.1.4	Road infrastructure.....	14
3.1.5	Cycling and pedestrian movements.....	15
3.2	Productivity and employment	16
3.3	Affordable housing	17
3.4	Land use and character	17
3.5	Built form, density and design	19
3.5.1	Built form and density.....	19
3.5.1	Recommended floor space ratios (FSRs).....	21
3.5.2	Design of buildings.....	21
3.6	Open space and green infrastructure	22
3.6.1	Increased open space	22
3.6.2	Town square.....	24
3.7	Social Infrastructure	25
3.8	Environmental considerations	26
3.8.1	Sustainability.....	26
3.8.2	Amenity Impacts.....	27
3.8.3	Stormwater and Flooding.....	27
4.0	Key Stakeholders.....	29
4.1	Government agency submissions	29
4.2	Non-government organisation submissions	34
4.3	Consultant submissions	39
5.0	Key changes to the draft Brookvale Structure Plan	46

1.0 Introduction

This report outlines the outcomes of the community and stakeholder engagement undertaken as part of the public exhibition of the draft Brookvale Structure Plan between 1 December 2022 to 28 February 2023. The Draft Brookvale Structure Plan sets out the vision and a spatial land use framework for Brookvale over the next 15 years to coordinate land use, growth, and infrastructure needs.

The draft Brookvale Structure Plan seeks to enable to the delivery of the following outcomes:

- A Town Square close to the B-line that is the civic heart for Brookvale, complete with community infrastructure, office space and residential areas.
- Revitalised Pittwater Road Corridor with ground-level double-height spaces supporting showrooms, entertainment, night-time economy, and creative maker spaces with residential dwellings above.
- Strengthening the industrial areas to better meet the needs of evolving industry.
- Opportunities for local professionals and entrepreneurs to work locally and grow their businesses with high quality office space close to the town centre.
- Integrate green infrastructure into new development with vertical and roof gardens, along with improvements to green grid corridors, connections, and shared uses.
- Sustainable built form and infrastructure supported by solutions that reduce resource use.
- Additional dwellings and building height increases in some areas to provide more diverse housing options and support feasibility for a 5% affordable housing target to support key workers.
- More streets will be upgraded, planting more trees, and introducing cycleways.

1.1 Engagement approach

The Draft Brookvale Structure Plan and associated technical studies were exhibited for public comment to ensure the views of all community members and stakeholders could be considered. Community and stakeholder engagement was conducted between Thursday 1 December 2022 and Tuesday 28 February 2023.

For the public exhibition, Council provided a mix of high-level and detailed information to cater to a broad audience and to simplify the technical nature of the strategic visioning and studies. Postcards were sent to over 4,500 properties that were within 1.5km of the Brookvale B-line bus stop, which included properties in Dee Why, North Curl Curl, North Manly and Allambie Heights. The high-level information included a snapshot document, two webinar videos and frequently asked question.

Two in-person engagement events were held consisting of a Business Briefing and Networking Session (7 February 2023) and a Community Drop-In Session (8 February 2023), where participants were able to ask questions.

A Question-and-Answer Forum was also made accessible through the project website during the first part of consultation, prior to the Christmas holiday period. The forum allowed the community to post questions which were publicly answered by Council's Strategic and Place Planning Team. A table of the questions and responses can be found at website - <https://yoursay.northernbeaches.nsw.gov.au/brookvale-structure-plan>.

The Council's Strategic and Place Planning Team was also available by phone, email and in person at the Dee Why office throughout the exhibition period.

A summary table of how Council engaged is provided in **Figure 1** below.








 Have Your Say: visitation stats	Visitors: 8,573	Visits: 12,060	Average time onsite: 2mins 13secs
 Social media	Post: 3 (1 Facebook, 1 LinkedIn and 1 Instagram)		Reach: 16,971 views Clicks: 138
 Videos	Overview Webinar: 1 Informative Webinar: 1 Promotional video: 1	Views: 879 Views: 693 Views: 1,338	
 Print media and collateral	Letterbox drop: 1.5km within B-line bus stop Site signs used: In Brookvale precinct Collateral availability: Warringah Mall & Dee Why Libraries	Distribution: 11,772 Number of signs: 6 Number: 2	
 Electronic direct mail (EDM)	Community Engagement (fortnightly) newsletter: 3 editions Council (weekly) e-News: 1 edition Stakeholder email: 2	Distribution: 22,000 subscribers Distribution: 180,000 subscribers Distribution: 504	
 Face-to-face or online sessions	Pop up / Drop in: 2 Online question and answer forum: 31 questions	Attendance: 118 Views: 2,774	
 Key stakeholder engagement	Interviews and Presentations: 2 Meetings: 8	Attendance: 50 Attendance: 36	

Figure 1 *How Council engaged*

2.0 Summary of submissions

2.1 Who responded¹

This section of the report provides an overview of comments received during public exhibition of the Draft Brookvale Structure Plan and technical studies. During the public exhibition period, 344 submissions were received including submissions from the Public, Business Owners, Organisations and Government Agencies. Most responses were received via the Have Your Say webform or emails.

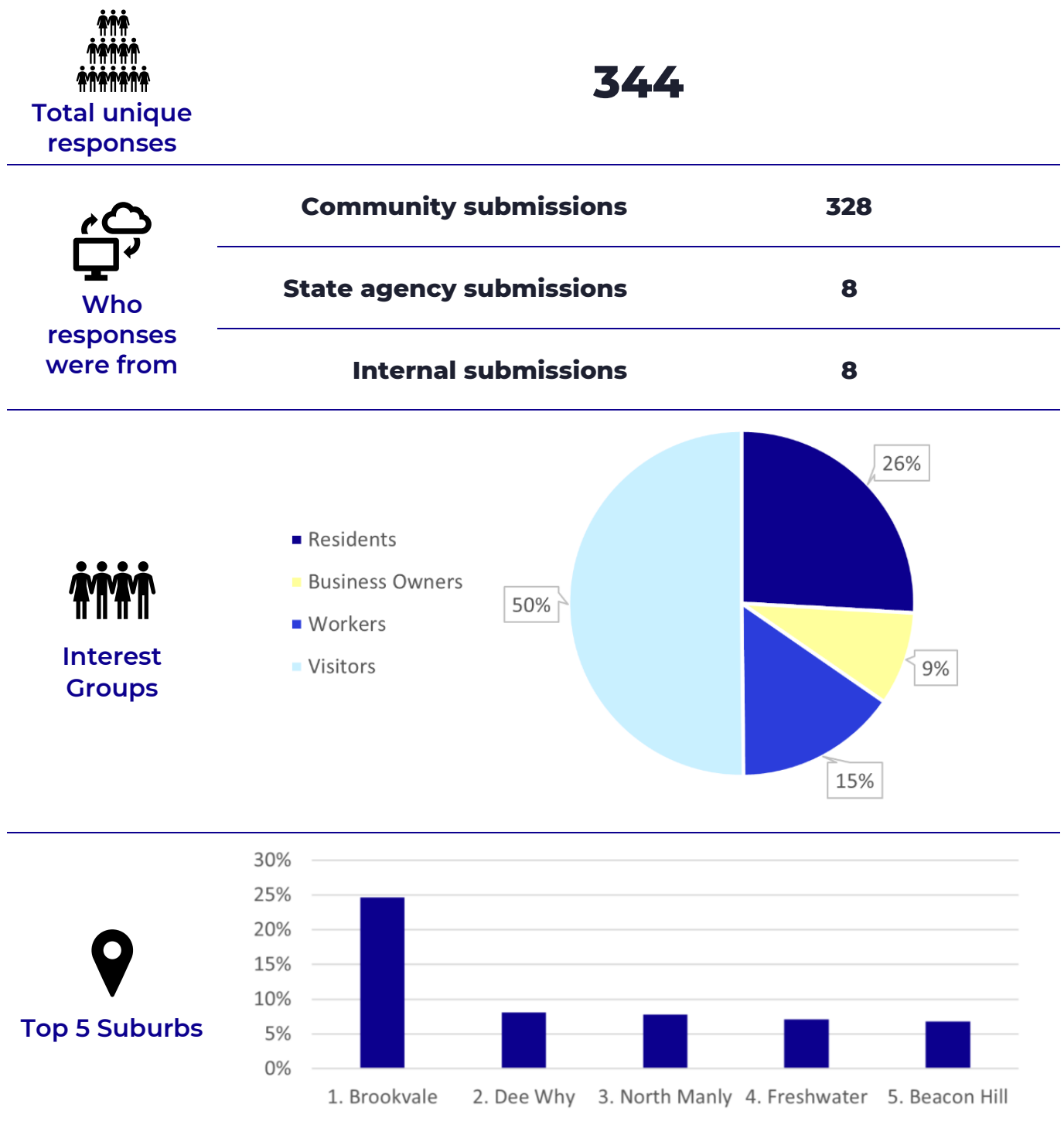


Figure 2 Who Responded

¹ Demographic data was gathered by request only. The data represented only includes those respondents who provided this detail.

2.2 Analysis of submissions

This section of the report provides an overview of the themes raised in the submissions and details Council response to these issues. A summary of the consensus for the draft Brookvale Structure Plan and the key thematic issues raised is provided in **Figures 3 and 4** below.

Overall, there was strong support (73%) for the vision of the draft Brookvale Structure Plan to revitalise and support growth in this location. While a majority of submissions (73%) supported the draft Brookvale Structure Plan, many of these provided further comment on recommended changes to the plan. 26% of submissions were opposed to the draft Brookvale Structure Plan.

A wide range of topics were raised during the consultation including traffic and parking, built form, scale and density, public open space, employment, affordable housing, sustainability, and environmental considerations. Most frequently raised topics, included:

- **Traffic congestion** - The general public and local business owners raised concern over current traffic congestion and how the existing street network can accommodate the proposed growth.
 - **Built form and density** - Varying viewpoints on height and density were noted from the submissions received during the public exhibition. This included those in support of the greater heights and density, while others objected to the proposed heights citing that these are too high.
 - **Land use and character** – Some submissions highlighted the need to protect the operation of existing businesses, including breweries and live music venues. Questions were raised surrounding the potential loss of character associated with the increase in density and population.
 - **Social infrastructure and open space** – Some submissions questioned the amount of additional open spaces proposed, while advocating for on-going improvement to existing recreational spaces to make sure they are safe, accessible and support the changing needs of Brookvale.
 - **Car parking** – Some submissions highlighted the current limited availability of parking spaces for workers and retailers. Suggestions were also made for recommendations to apply more restrictive parking schemes, while others suggested higher car parking rates for both residents and visitors within new developments to off-set on street parking congestion.
- Sustainability** – Submissions supported the integration and incentivisation of renewable energy generation and the proposed actions of the plan to investigate new planning controls to improve sustainability outcomes.

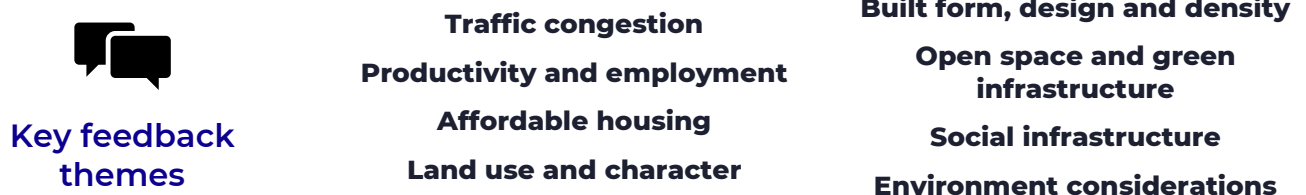
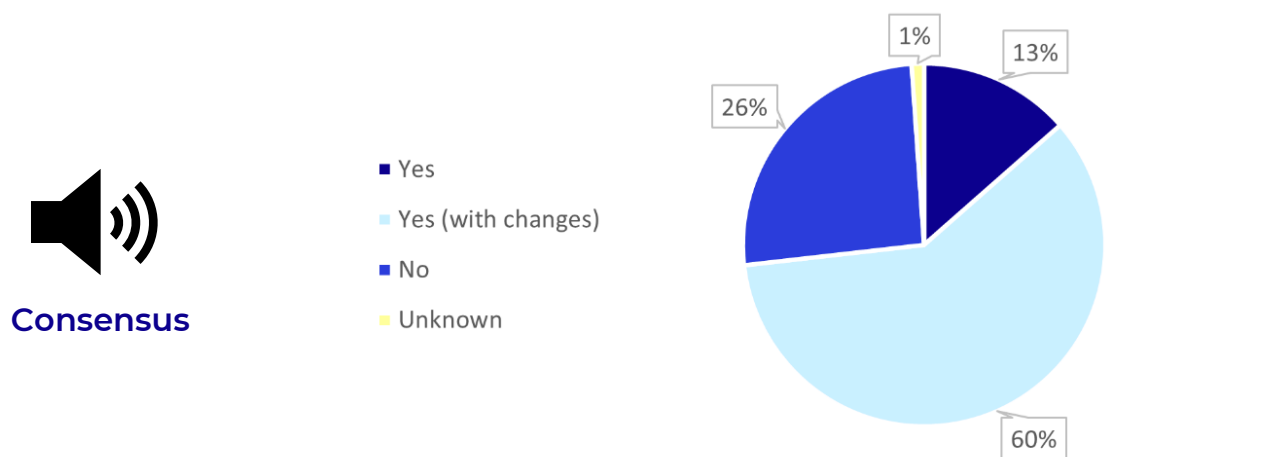


Figure 3 Key feedback

Key Themes Raised in Submissions

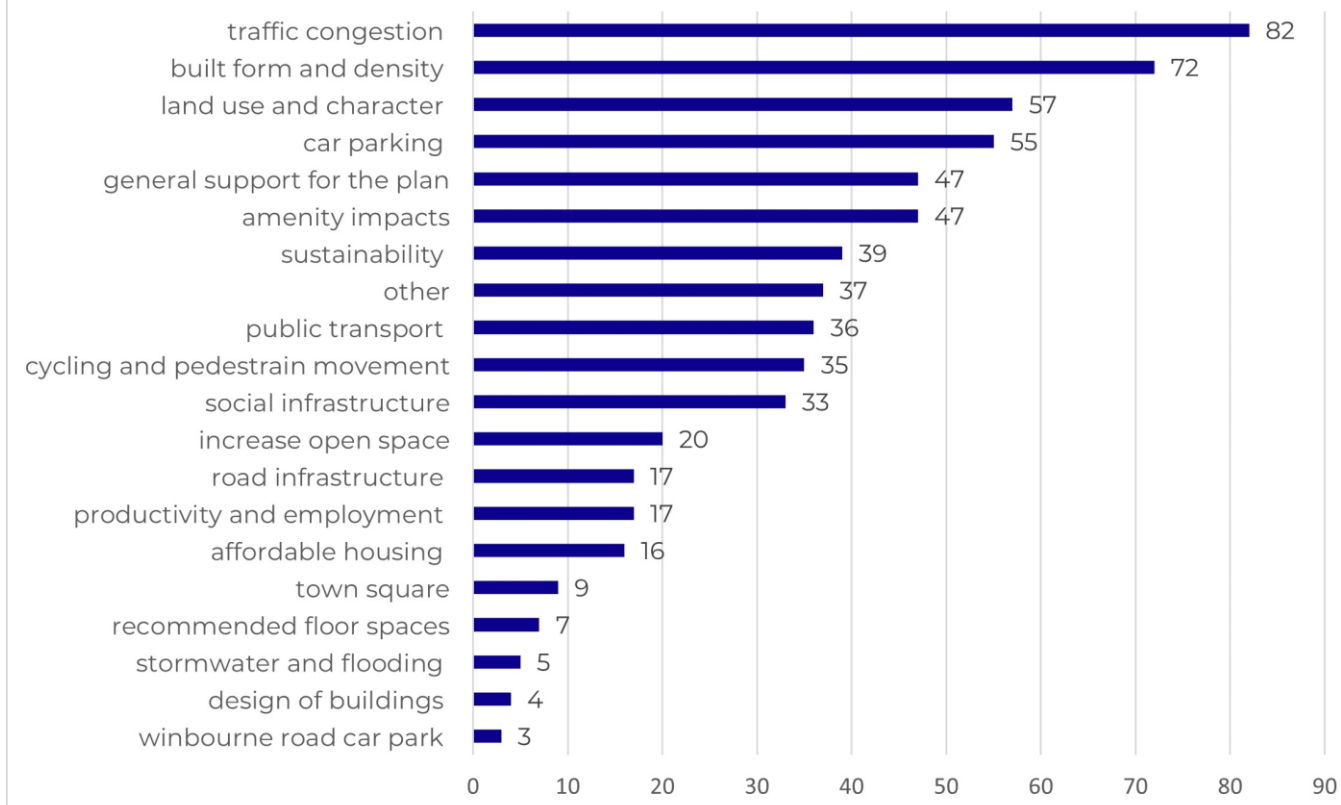


Figure 4 Themes raised by submissions

3.0 Response to key matters raised

This section provides further detail with regard to the key matters raised during the public exhibition and responses to address how these matters have been considered and whether further change to Draft Brookvale Structure Plan is required. This has been arranged by the key thematic matters identified by the community, which include:

- Transport
- Productivity and employment
- Affordable housing
- Land use and character
- Built form, density and design
- Open Space and green Infrastructure
- Social infrastructure
- Environmental considerations.

Responses to key stakeholder submissions, including government agencies, non-government organisations and consultant submissions prepared on behalf of major landowners are details in **Section 4.0**.

3.1 Transport

3.1.1 Traffic congestion

A total of 82 respondents raised concern with traffic congestion and the impact any future growth may have on the existing traffic network. The top matters to emerge from a review of this sub-set of submissions, include:

1. Current congestion and questions on how the existing street network can accommodate the proposed growth.
2. Advocacy for stronger planning controls to mitigate congestion.
3. Increased travel times and impacts on mental health.
4. The timing of when the TMAP data was collected.

A response to the themes to emerge from engagement and Council's response is provided below.

Increased traffic congestion caused by proposed growth under the Draft Brookvale Structure Plan

The general public and local business owners raised concern over current traffic congestion and how the existing street network can accommodate the proposed growth. Questions were also raised over the potential impact on existing businesses who rely on vehicular access for operation and sales.

Council's response

The Draft Brookvale Structure Plan was informed by the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan (Bitzios, 2021) which includes updated traffic modelling to determine the potential for additional homes and jobs without causing undue traffic congestion. Based on this analysis, and further consideration of shifting travel modes share targets, Brookvale can accommodate an additional 1,300 dwellings and 975 jobs (or 1,350 dwellings and 900 jobs) with a number of localised traffic upgrades which are proposed to be funded through developer contributions. Longer term major road upgrades such as the grade separation at the Pittwater Rd and Warringah Rd intersection would be needed to accommodate growth beyond the 1,300 dwellings and 975 jobs (or 1,350 dwellings and 900 jobs) proposed in this plan.

It is also noted that further transport studies will be undertaken to inform any subsequent planning processes, including for future rezoning proposals and development applications. These subsequent studies will provide a more detailed assessment of potential traffic impacts associated with a future proposal, and what mitigation measures would be required to manage this impact.

Given the above consideration, no change is proposed to the Brookvale Structure Plan.

Advocacy for stronger planning controls to mitigate congestion

The general public advocated for stronger planning controls to mitigate congestion.

Council response

To manage increased traffic congestion, we need to become more thoughtful in how we design places to make it easier for residents to use public and active transport rather than private vehicles. Public and active travel result in fewer emissions, less traffic congestion, noise and pollution and result in improved health outcomes when we live more active lives. Brookvale will provide the opportunity for housing options that support this lifestyle. Brookvale is the most connected centre on the Northern Beaches by public transport and has a wide range of amenity within easy walking distance which will support a shift in travel modes for future residents. Our land-use planning decisions strongly influence where and how people live, work, and play. Through our planning controls and broad strategic planning initiatives, we can actively contribute to further encouraging a shift toward more public and active modes of travel.

The Draft Brookvale Structure Plan aims to support the implementation of planning controls that will encourage behavioural change towards more sustainable modes of travel by prioritising active modes of transport (walking and cycling), use of public transport (B-line and other buses), and use of car share services. Section 7.11 Developer contributions will be put towards pathways and streetscape works to improve safety and amenity for pedestrian and cyclists. This is reflected by the actions identified by the draft Brookvale Structure Plan, including:

- **Action 15** - Adopt new planning controls to ensure new development provides bicycle parking and end of trip facilities such as showers, lockers and change rooms to support cycling as a mode of transport
- **Action 16** - Implement maximum car parking rates for Brookvale as part of controls of a Development Control Plan and investigate opportunities for time restrictions for improved turnover and availability of on street parking
- **Action 17** - Require the provision of dedicated car share spaces and electric vehicle parking spaces as part of new development.
- **Action 42** – Continue to advocate for improvements to the frequency and reliability of the B-line bus service with Transport for NSW

These planning controls will be further investigation as part of Council's preparation of a Planning Proposal seeking to amend the Local Environmental Plan and a draft site-specific Development Control Plan for Brookvale.

Impact on travel times and mental health

Submissions highlighted increased densities will cause traffic congestion and travel times, potentially impacting the mental health of residents.

Council response

Our land-use planning decisions strongly influence where and how people live, work, and play and Council is committed to ensuring positive health outcomes for Brookvale residents. Public and active travel result in fewer emissions, less traffic congestion, less noise, pollution, and result in improved health outcomes when we live more active lives. The Draft Brookvale Structure Plan aims to encourage behavioural change towards more sustainable modes of travel by prioritising active modes of transport (walking and cycling), use of public transport (B-line and buses), and use of car share services. By concentrating employment and housing growth close to the B-line bus stop, and the Warringah Mall shopping centre the Plan is supporting walkability and use of public transport, which reduces reliance on private cars and is one of the most effective ways of reducing congestion on our local road network.

We acknowledge this lifestyle may not suit everyone which is why there will continue to be plenty of places to live in Brookvale and across the Northern Beaches that provide a private parking space. For those who would like to live car-free, Brookvale will provide the opportunity for housing options that support this lifestyle.

Questions regarding when the traffic data was collected

Submissions noted that the data informing the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan was collected during the COVID-19 Pandemic. The submissions state that this may not reflect regular Brookvale traffic patterns, including during peak times.

Council response

The Draft Brookvale Structure Plan has been developed based on careful consideration of the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan (TMAP) which includes updated traffic modelling to determine the potential for additional homes and jobs without causing undue traffic congestion.

It is also noted that further transport studies will be undertaken to inform any subsequent planning processes, including for future rezoning proposals and development applications. These subsequent studies will provide a more detailed assessment of potential traffic impacts associated with a future proposal, and what mitigation measures would be required to manage this impact.

Given the above consideration, no change is proposed to the Brookvale Structure Plan.

3.1.2 Public transport

A total of 36 submissions surrounded existing public transport services in Brookvale supporting future growth. The top themes to emerge from a review of this sub-set of submissions, include:

1. Questions surrounding whether the B-line bus service will be able to support additional growth.
2. Questions surrounding the proposed 24-hour bus lane.
3. Advocacy for both public and private sector investment into transport infrastructure.

Capacity of B-line bus services

Submissions questioned whether the B-line bus service will be able to support additional growth. The submissions noted existing issues surrounding capacity during peak hours, frequency and reliability of services, destination variety and stop locations.

Council response

The B-Line service, which began operating in November 2017, significantly improved public transport accessibility to Brookvale with connections to Mona Vale and Sydney CBD. With services operating every 10 minutes throughout the day, the B-Line stop located adjacent to Warringah Mall on Pittwater Road will help ensure Brookvale continues to be a place for jobs and new housing.

We are committed to ensuring that public transportation infrastructure is meeting the needs of Brookvale residents. Current service levels operate every 10-minutes. Should there be a point where this frequency is no longer deemed adequate, Council will advocate for necessary service changes to be made with Transport for NSW.

Proposed 24-hour bus lane

Submissions questioned whether the proposed lane reduction to accommodate a new, 24-hour bus lane on Pittwater Road will strain existing road infrastructure. The submissions further emphasize that provision of a bus lane or cycleway is not supported if it results in the reduction of transit lanes or parking.

Council response

The Draft Brookvale Structure Plan does not propose to reduce the current road reservation along Pittwater Road, nor the existing bus lanes. It is noted that the visual renders include visuals of a proposed cycleway along Pittwater

Road. This cycleway is envisioned to be delivered alongside the existing road reservation for Pittwater Road and would rely on road widening through future land dedications as part of future development within Brookvale. It is important to recognise that the proposed cycleway is an indicative approach to encouraging an active travel route along Pittwater Road, however, still requires further investigation. This is intended to be further detailed as part of the subsequent rezoning process. Sections of the existing bus lane currently operate as a clearway during peak periods. The State Government may over time consider extending the clearway hours to 24-hours. This is a matter for the State Government and parking supply and demand around the bus lane would form part of its investigations.

Improved public transport infrastructure

Submissions advocated for improvements to public transport services within Brookvale. This included suggestions for private sector contributions to fund transport infrastructure which is delivered prior to development. Suggestions were also made for a train line to service the Northern Beaches or the extension of the metro line from Chatswood to Brookvale.

Council response

We are committed to ensuring that public transportation infrastructure is meeting the needs of Brookvale residents. Current bus service levels operate every 10-minutes. Should there be a point where this frequency is no longer deemed adequate, Council will advocate for necessary service changes to be made with Transport for NSW.

3.1.3 Car parking

A total of 55 submissions surrounded the provision of a car parking to support future growth in Brookvale. The top themes to emerge from a review of this sub-set of submissions, include:

1. Loss of car spaces at Winbourne Road.
2. Impact of lack of parking on existing businesses.
3. Proposals for new parking restrictions, including resident permit scheme and no parking zones along already congested roads.
4. Requests two car parks per dwelling and visitor parking in new developments.
5. EV charging in car parks.

Loss of car spaces at Winbourne Road car park

Submissions raised questions surrounding the potential loss of car parking spaces at Winbourne Car Park.

Council response

The draft Brookvale Structure Plan aims to better adapt Council's existing landholdings for a broader range of purposes to improve its contribution to fostering greater activation and place-making within Brookvale. One potential initiative is the investigation of adapting Winbourne Car Park beyond its current car parking function to facilitate a range of temporary uses, such as small-scale community events and markets during times of the day when the car park is less utilised (e.g. night-time, weekends). This aims to provide new places where people can be meet, socialise and add vitality to the Brookvale neighbourhood, creating a better and more vibrant place to live and work. These activities would also provide an opportunity for local businesses to showcase their products and services. It is not the intention to permanently reduce or remove the existing car parking spaces at Winbourne Car Park.

To support this initiative, the draft Brookvale Structure Plan identifies the following actions:

- **Action 21** - Facilitate events and markets on council owned land such as Winbourne Road Car Park during non-peak periods of the week (i.e. night-time or weekends) to promote Brookvale as a diverse place for commerce and interaction
 - **Action 22** - Encourage mixed active frontages addressing rear laneways and Winbourne Road Car Park that supports some active ground floor uses while supporting rear lane access to parking and business loading facilities
-

Loss of car spaces at Winbourne Road car park

This initiative will be further investigated as part of Council's preparation of a Planning Proposal seeking to amend the Local Environmental Plan and a draft site-specific Development Control Plan for Brookvale.

Limited parking for existing businesses

The current limited availability of parking spaces for workers and retailers.

Council response

The issue of limited availability of street parking within Brookvale's employment precincts is noted and recognised. Council's current Development Control Plan currently identifies on-site parking provisions for a range of employment-based land uses (including industrial) to ensure adequate on-site parking is delivered as part of any future development. With regard to employment-based parking rates, this is based on allowing for sufficient parking on-site for workers and customers of the premises, in order to minimise demand for on-street parking.

Further investigation into parking requirements will be undertaken by Council as part of the rezoning phase of the project. Time restricted parking will also be considered to ensure there is sufficient turnover in available car parking spaces for visitors and customers to visit their respective retailer.

To support this initiative, the draft Brookvale Structure Plan identifies the following action:

- **Action 16** - Implement maximum car parking rates for Brookvale as part of controls of a Development Control Plan and investigate opportunities for time restrictions for improved turnover and availability of on street parking

Application of off-site parking restrictions in Brookvale

Suggestions for parking restrictions to apply in congested parts of Brookvale were put forward. This included consideration of resident permit scheme and no parking zones.

Council response

As noted above, further investigation into parking requirements will be undertaken by Council as part of the rezoning phase of the project. Time restricted parking will also be considered to ensure there is sufficient turnover in available car parking spaces for visitors and customers to visit their respective retailer.

To support this initiative, the draft Brookvale Structure Plan identifies the following action:

- **Action 16** - Implement maximum car parking rates for Brookvale as part of controls of a Development Control Plan and investigate opportunities for time restrictions for improved turnover and availability of on street parking

Car parking rates

Community submissions suggested higher car parking rates for both residents and visitors within new developments to off-set on street parking congestion.

Council response

One of the key strategies to achieve the objective of minimising the traffic impacts arising from new development within Brookvale is the introduction of maximum car parking rates for future development. Maximum car parking rates are used to ensure that parking is not oversupplied and promotes the use of sustainable forms of transport. Similar to the Frenchs Forest town centre where maximum car parking rates are in force for residential uses, DCP controls would be updated for Brookvale to introduce maximum rates for future residential uses. In addition, similar to Frenchs Forest, requirements would be in place around the need to provide dedicated car share and electric vehicle charging parking spaces as part of new development within the centre.

As part of subsequent rezoning process for Brookvale, Council will undertake a more detailed transport study into suitable maximum car parking rates for future residential development in Brookvale. Further consideration of time

Car parking rates

restricted parking will also be investigated to ensure there is sufficient turnover in available car parking spaces for visitors and customers.

Provision of electric vehicle (EV) charging stations

Submissions suggested Council investigate the provision of electric vehicle charging stations as part of future private and community facility developments

Council response

Identified as a short-term win, **Action 17** of the Brookvale Structure Action Plan requires the provision of dedicated car share spaces and electric vehicle parking spaces as part of new development. This will be investigated further as part of the rezoning phase, where specific planning controls for EV charging stations will be proposed as part of a site-specific Development Control Plan for Brookvale.

3.1.4 Road infrastructure

A total of 17 submissions surrounded the adequacy of existing road infrastructure support future growth in Brookvale and mobility. The top themes to emerge from a review of this sub-set of submissions, include:

1. Lack of road infrastructure maintenance.
2. Access for garbage collection servicing.
3. Road safety issues, specifically around congestion points and conflicting land uses.

Lack of road infrastructure maintenance

Submissions surrounded the lack of road maintenance, resulting in poor quality roads that are vulnerable to flooding and exacerbate congestion. Specific suggestions were put forward regarding upgrades to Government Rd / Warringah Rd intersection, Pittwater Road/Warringah Rd and Dee Why Town Centre choke points, and Pittwater Road/Wakehurst Parkway, Narrabeen Bridge and Spit Bridge. A few submissions also advocated for increased road width to facilitate dual carriageways and the extension of laneways.

Council response

High-quality roads are critical to support the movement of vehicles for public transport, private vehicles and freight. Council has identified opportunities to deliver public benefit, including the improvement of existing roads, as part of the recommended actions of the Brookvale-Dee Why Transport Management and Accessibility Plan (TMAP). As part of the planning proposal process for Brookvale, a draft Contributions Plan will be prepared to levy local contributions that will partly go toward funding these road improvements to ensure the traffic network is able to manage the future growth of the area.

Additionally, as part of this process, Council has received feedback on the TMAP from Transport for NSW and is working to incorporate all required changes. Council will continue to work with the NSW State Government to identify future opportunities for State road infrastructure projects and ongoing road maintenance.

Access for garbage collection services

Questions were put forward surrounding how the proposed densities and road widths will impact garbage collection access.

Council response

As a local government responsibility, Council is committed to ensuring waste management, including garbage collection, is not disrupted as a result of this plan. The Draft Brookvale Structure Plan has been developed based on careful consideration of the 2021 Brookvale-Dee Why TMAP which includes updated traffic modelling to determine

Access for garbage collection services

the potential for additional homes and jobs without causing undue traffic congestion. As part of any proposed road improvements, consideration will be given to service vehicle operations, including garbage collection vehicles, to ensure adequate road and circulation widths are provided.

Road safety issues

Questions were put forward surrounding local road safety amidst industrial heavy vehicles and local residential traffic, particularly around Corrie Road, Pozieres Parade, Victor Rd, Shackel & Pine Avenue, Wattle Road and outside Old Pittwater Rd. A number of comments were also made about the implementation of traffic calming measures around high pedestrian traffic areas.

Council response

The Draft Brookvale Structure Plan has been developed based on careful consideration of the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan (TMAP) which includes updated traffic modelling. By undertaking several localised traffic upgrades, which are proposed to be funded via developer contributions, Brookvale can accommodate additional homes and jobs without causing undue traffic congestion and traffic safety measures. Section 7.11 Developer Contributions will also be used to fund improvements to pedestrian and cycle paths along key routes.

Specific road safety improvements will be investigated further as part of the rezoning process, which will be informed by a more detailed study which considers potential road safety measures to manage conflicts between vehicle and pedestrian movements and between industrial and residential traffic.

3.1.5 Cycling and pedestrian movements

A total of 35 submissions surrounded cycling and pedestrian movement within Brookvale. The top themes to emerge from a review of this sub-set of submissions, include:

1. Clarity on provision of cycle connections within Brookvale and wider connectivity to Balgowlah, Manly Vale, and Dee Why.
2. Concerns about pedestrian safety and connectivity in Brookvale.

Improved cycling connections within Brookvale and beyond

Submissions highlighted the need for cycleway network improvements. Several initiatives were proposed including east-west connections, connections to parklands and beaches, separated cycleways, and public bicycle parking. Specific concerns were also made around the safety of cyclists, impact on traffic congestion during peak hours, and consideration of e-bicycles.

Council response

The proposed movement network for the Brookvale Structure Plan aims to create a more permeable street network that supports access by walking, cycling and public transport. The proposed cycling network is aligned with the recommendations arising from Council's 2020 Bike Plan, including new or enhanced bicycle connections along key streets such as Cross Street, Orchard Road, Pittwater Road, and William Street. As outlined in the Northern Beaches Transport Strategy 2038, prioritising smart, active travel network improvements (through technology, end of trip facilities and way-finding signage), including expanded footpath and shared path networks, will aim to improve connectivity and safety and make walking and cycling attractive alternatives to cars.

Improved pedestrian safety and mobility

Questions surrounding pedestrian safety and movement were raised and several initiatives including through site links, additional pedestrian bridges and innovative crossings with a specific focus around schools and social

infrastructure were proposed. Specific areas of interest included: Winbourne/Pittwater Road; Roger St/Old Pittwater Rd; Beacon Hill Road & Old Pittwater Road; Elizabeth Place, Brookvale Oval, Harbord & Sydenham Road, Allambie Road.

Council Response

As outlined in the Northern Beaches Transport Strategy 2038, prioritising smart, active travel network improvements (through technology, end of trip facilities and way-finding signage), including expanded footpath and shared path networks, will aim to improve connectivity and safety and make walking and cycling attractive alternatives to cars. Additional analysis is required to address transport network severance across the five precincts and identify high-priority road crossings for active transport as well as further analysis of streets suitable for traffic calming and potential redesign.

Specific road safety improvements will be investigated further as part of the rezoning process, which will be informed by a more detailed transport study.

3.2 Productivity and employment

A total of 17 submissions surrounded challenges to sustaining productivity and employment opportunities to support future growth in Brookvale. The top themes to emerge under this category, include:

1. Rent pressures on existing businesses.
2. Impact of construction on existing business such as the decrease in foot traffic and forced closures.
3. Support for greater flexibility of planning controls to facilitate Brookvale's night-time economy.

Rent pressure on existing businesses

Questions from local business owners surrounding rent increases as a result of proposed development arose. Small boutiques, artists' studios, vehicle manufacturing, creative and live music venues, and local businesses in industrial areas were areas identified in the submissions. Comments were also made about ground floor retail space vacancy and the use of non-retail spaces for retail.

Council response

Brookvale is the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. It is important that we retain and manage Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones. Creative industries are continuously emerging throughout Brookvale's employment lands, including within its industrial lands. There is an opportunity to encourage these types of uses closer toward activity areas, while managing any impact of creative-led gentrification on industrial businesses in the industrial zone. An initiative to manage this impact is to encourage these uses toward Pittwater Road and Roger Street where cultural and creative industries can cluster, collaborate, and grow.

To support this outcome, future planning controls will be investigated as part of the rezoning process to promote cultural and creative industries at the ground level of future mixed use developments along Pittwater Road and Roger Street. This will be supported by additional guidance to maintain a suitable level of amenity for future residents, while supporting the ongoing operations of the creative industry sector.

Impact on existing businesses from construction activity

Questions from local business owners surrounding construction of high density areas and impacts to their businesses as a result of decreased foot traffic and forced closures arose.

Council response

Council is committed to minimizing future construction impacts on local businesses. By taking steps focused on communication and coordination, planning and permitting, construction schedules, traffic and parking management, as well as support and promotion via Council's Place Coordinators, we will work closely with all

stakeholders to support local businesses. This matter would be addressed as part of the Development Application process for any future development within Brookvale.

Flexibility of planning controls to facilitate Brookvale's night-time economy

Local business owners were supportive of greater flexibility of planning controls for employment areas such as exempt and complying, extended trading hours and late-night trading development control plans. The submissions also stated that this could help to mitigate conflict between adjacent residential use and cultural activities.

Council response

Support for greater flexibility of planning controls for employment areas to facilitate Brookvale's night time economy is noted. Council is committed to retaining and managing industrial land and any night time economy activities in the industrial areas must be ancillary to a primary industrial use.

3.3 Affordable housing

A total of 16 submissions surrounded housing to support the future growth in Brookvale. The top theme to emerge under this category surrounded the proposed affordable housing targets.

Affordable housing

Questions were raised surrounding the proposed 5% affordable housing targets. The submissions suggest a 10% target should be adopted by Council. Further the submissions proposed opportunities for FSR bonuses for affordable housing commitments within new developments.

Council response

As part of the preparation of the Draft Brookvale Structure Plan, higher rates of affordable housing have been tested. However, we must be able to show that affordable housing contribution rates are viable and will not affect development feasibility. In order to attain a higher percentage, we would need to further increase to proposed density and the number of dwellings within Brookvale, which at this point in time, cannot be accommodated by the existing road network.

Given this constraint, any new residential floorspace is proposed to have 5% of it designated for affordable rental accommodation, which has been tested to confirm that a viable development outcome can be achieved. This could result in the delivery of about 65 apartments for affordable housing. Council is committed to continue to investigate further opportunities to increase the provision of affordable housing throughout the Northern Beaches local government area and will investigate opportunities with the owner of the Warringah Mall site to deliver an affordable housing target up to 10%. As masterplanning for this site progresses, and more detailed development proposals emerge, it may be that further feasibility testing identifies contributions of higher than 5% a viable prospect.

3.4 Land use and character

A total of 57 submissions surrounded future land use and the impact on Brookvale's character. The top themes to emerge under this category, include:

1. Increased support for late-night trading, including live music venues, breweries, and small businesses.
2. Protection of Brookvale's character and suggestions for a stronger identity and heart of Brookvale.

Protection of the operation of live music venues, breweries, and small businesses

Submissions highlighted the need to protect the operation of existing businesses, including breweries and live music venues, within industrial areas due to noise complaints. Other submissions also noted the opportunity to grow the live music scene and nightlife with larger capacity venues within Brookvale, as well as the introduction of new

controls supportive of late-night trading. Suggestions included extended hours of operation and exempt development for high and low impact uses.

Council response

Creative businesses will continue to be supported across Brookvale depending on their predominant types of activity. Non-industrial creative businesses will be supported with opportunities for retail showrooms, makerspaces and exhibition and performance spaces along Pittwater Road and Roger Street closer to the B-line and where there will be stronger visibility and access by the public. The emerging microbrewery cluster in the eastern industrial precinct can continue to grow its live music and entertainment offerings as ancillary to the primary manufacturing activity. Restaurants and bars will be permissible within the mixed use areas along Pittwater Road and Roger Street at ground level. Specifically, this is reflected by the following action identified by the draft Brookvale Structure Plan, including:

- **Action 36** - Investigate opportunities to support an enhanced night economy with after-hour uses such as restaurants and bars in the Core character sub-precinct

Future planning controls will be investigated as part of the rezoning process to support this action for Brookvale.

Stronger identity and heart of Brookvale

Questions were raised surrounding the potential loss of character associated with the increase in density and population, and its impact on the community feel and character of the area. Other submissions advocated for the creation of a civic core that attracted residents, workers and visitors.

Council response

Council is committed to ensuring Brookvale continues to be an accessible and enlivened place to live that enjoys high levels of access to goods and services and opportunities to work close to home. The recommended uplift in density will promote Brookvale's renewal and growth as an employment-focused centre, where the community will benefit from improved environmental qualities, public spaces, and community services. The Draft Brookvale Structure Plan outlines five character sub-precincts which include the Core, Roger Street, Pittwater Road, the Industrial East, and the Industrial West. Each will support different aspects of the community vision, supporting the diverse amenities valued by residents, visitors, and employees.

Complementing the current industrial, creative and retail activities in Brookvale, there is a need to support more higher order employment within the centre. A key part of the vision for Brookvale is to establish a hub of commercial, civic and entertainment functions, centred around a town square and public transport facilities that will help to provide an identifiable 'heart' for Brookvale and provide stronger visibility and awareness of the thriving small business community on the Northern Beaches. By establishing an attractive commercial, civic and entertainment core in Brookvale, this can draw commercial office demand from surrounding centres including Manly, Balgowlah and Dee Why while enticing home based businesses into a more professional setting where they can grow and do business with each other.

3.5 Built form, density and design.

3.5.1 Built form and density.

A total of 72 submissions surrounded the proposed building heights and density in Brookvale. The top themes to emerge from a review of this sub-set of submissions, include:

1. Proposed building heights and density.
2. Potential view impacts of the Brookvale Escarpment.
3. Proposed population and concentration within Brookvale.

Proposed building heights and densities

Varying viewpoints on height and density were noted from the submissions received during the public exhibition. Those in support of the greater heights and density stated more should be done to address housing shortages and facilitate the shift of commercial spaces from heavy industrial to light industrial and retail uses.

Those who objected felt that proposed heights are too high and would result in adverse impacts from overshadowing, overcrowding, views/outlook intrusion, and reduced visual privacy. The submissions generally agreed that building heights of 3-8 storeys for both industrial and residential were more aligned with the neighbourhood character of Brookvale.

A number of submissions also expressed that there was a lack of adequate consultation with the community about appropriate heights and densities proposed in the plan.

Council response

The Draft Brookvale Structure Plan has been developed based on careful consideration of the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan which includes updated traffic modelling to determine the potential for additional homes and jobs without causing undue traffic congestion. Based on this analysis Brookvale could accommodate up to an additional 1,300 dwellings and 975 jobs (or 1,350 dwellings and 900 jobs) by undertaking a number of localised traffic upgrades which are proposed to be funded through developer contributions. In addition, Brookvale is the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. Council is also mindful of the need to retain and manage Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones.

The Plan proposes that:

- the north-east corner of the Warringah Mall site close to the B-Line will set the benchmark upper height of residential buildings in Brookvale at up to 52 metres (15 storeys). See Section 4.3 for a detailed explanation. The height controls will retain an area for the provision of the town square.
- a maximum building height of 30 metres (8 storeys) within proposed mixed-use areas to the north along Roger Street and Pittwater Road.
- for land zoned E4 General Industrial, a maximum building height of 18 metres (up to 4 storeys depending in floor-to-ceiling heights) is recommended.

The proposed heights under the draft Brookvale Structure Plan aim to give effect Council's Local Strategic Planning Statement and Local Housing Strategy, which identify Brookvale as a key area to contribute to the LGA meeting its mandated target in jobs and homes. To support this growth, additional height and density in a well-served location aligns with the objectives of Council's strategic planning documents. With Brookvale forming part of the Brookvale-Dee Why strategic centre, the proposed heights are comparable to maximum building heights seen in other strategic centres within the LGA, notably Frenchs Forest and Dee Why. Furthermore, there is a feasibility consideration with regard to the proposed height and density, where minimum floor space ratios are needed to enable financially viable renewal to occur in Brookvale. The proposed Structure Plan aims to provide balance objectives and issues, while providing an acceptable outcome with regard to heights within this location.

Regarding consultation, community members were invited to call or email us, attend a drop-in session, attend a business briefing, watch a webinar, and review all materials online. We also used an online question and answer forum to hear from our community during the first part of the consultation. We received many questions which gave

us some great insights and things to think about. The questions and answers are still available online for the community to refer to <https://yoursay.northernbeaches.nsw.gov.au/brookvale-structure-plan>.

View impacts

Submissions raised questions surrounding the proposed building heights impacting current resident's views of the Brookvale Escarpment. The submissions further noted potential impacts to property values in Beacon Hill, Allenby Park Parade, and Allambie Heights.

Council response

The Draft Brookvale Structure Plan is proposing maximum height controls across the community. We anticipate development to occur in an incremental manner and impacts to sightlines to be minor. There will also be additional opportunities for the public to provide Council with feedback on any future view impacts as part of the subsequent rezoning process and Development Applications.

Overpopulation

Submissions raised questions surrounding the proposed concentrated population in Brookvale. Many of the submissions claimed that the Draft Brookvale Structure Plan proposal will result in overcrowding and overdevelopment of Brookvale which will affect quality of life and living standards for Brookvale residents. Submissions also specifically mention that development of industrial areas is unnecessary.

Council response

Council is committed to ensuring Brookvale continues to be a vibrant, accessible, and enlivened place to live. As an employment-focused centre, our community will continue to benefit from unique environmental qualities, public spaces, and community services.

The proposed growth under the draft Brookvale Structure Plan aims to give effect Council's Local Strategic Planning Statement and Local Housing Strategy, which identify Brookvale as a key area to support the LGA's growth in homes and jobs. To support this growth, additional height and density in a well-serviced location aligns with the objectives of Council's strategic planning documents. Furthermore, the draft Brookvale Structure Plan has been developed based on careful consideration of the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan which includes updated traffic modelling to determine the potential for additional homes and jobs without causing undue traffic congestion. Based on this analysis Brookvale could accommodate up to an additional 1,300 dwellings and 975 jobs (or 1,350 dwellings and 900 jobs) by undertaking a number of localised traffic upgrades which are proposed to be funded through developer contributions.

In addition, Brookvale is the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. Council is also mindful of the need to retain and manage Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones.

3.5.1 Recommended floor space ratios (FSRs)

A total of 7 submissions surrounded proposed FSRs and feasibility. The top themes to emerge from a review of this sub-set of submissions, include:

1. Feasibility of development in relation to the proposed floor space ratios and building height.
2. Suggestions for value uplift sharing and FSR incentives.

Feasibility of development

Some submissions questioned the suitability of proposed FSRs for both developers to invest in and current home owners to sell.

Council response

In response to submissions concerns relating to feasibility, Atlas Economics have reviewed the supporting Urbis feasibility assessment and have considered the softening of site values since 2020 (reflecting the current cost and higher interest rates environment). Based on this review, Atlas have recommended that a marginal increase of FSRs is required (assuming 5% Affordable Housing), including:

- an FSR of 2.3:1 for the Core (i.e. the Warringah Mall site) or an equivalent maximum residential gross floor area of approximately 26,000sqm and a minimum employment gross floor area of 11,000sqm – an increase from 1.9:1 in the exhibited draft Brookvale Structure Plan
- an FSR 2.5:1 for areas for Pittwater Road and Roger Street sub-precincts – an increase from 2.3:1 and 2.4:1 in the exhibited draft Brookvale Structure Plan.

The increase of FSR requirements has required a rebalancing of the target homes and jobs under the revised Structure Plan to limit any adverse impacts to the traffic capacity of the Brookvale-Dee Why area. The revised homes and jobs targets under the revised Structure Plan has been set to:

- 1,350 homes
- 900 jobs.

Value uplift sharing and FSR incentives

Submissions put forward suggested that value tied to uplift should be distributed between the landowner/developer and the public. Submissions also mention the potential implementation of lower base FSRs to incentivise larger affordable housing FSR bonuses.

Council response

Further investigation into detailed planning controls will be undertaken as part of the any subsequent planning proposal process. This will include mechanisms to ensure affordable housing is delivered as part any new residential floor space in Brookvale. At this point in time, Council is proposing to adopt a 5% affordable housing contribution levy for new residential floorspace delivered in the existing mixed use areas along Pittwater Road and Roger Street. Feasibility testing has found that a higher percentage of affordable housing would compromise viability of redevelopment and hinder growth and renewal of Brookvale. Council is investigating the potential for up to 10% affordable housing contribution for the Warringah Mall site.

3.5.2 Design of buildings

A total of 4 submissions surrounded urban design and specific planning controls. The top theme to emerge from a review of this sub-set of submissions surrounded recommendations on the design of future buildings.

Design of future buildings

The submissions suggest urban design guidelines be implemented with a focus on integration of proposed core, public spaces, and high-density housing. Specific comments were also provided around increased setbacks for taller buildings.

The submissions also advocate for guidance around aesthetics, materials, and landscaping to establish a desirable core and place identity through design excellence. A number of comments were also made in relation to the incorporation of public art and greenery within the streetscapes of Brookvale.

Council response

The purpose of a Structure Plan is to provide the long-term vision and planning framework to guide future development. If the revised Draft Brookvale Structure Plan is adopted by Council, the next phases of work will involve several important tasks. This will include the preparation of a Planning Proposal and accompanying technical studies to inform future planning controls for new mixed use buildings within Brookvale.

A key technical study as part of the planning proposal process will be the preparation of an Urban Design Study which will detail an indicative concept for built form and public domain outcomes within Brookvale, which will later inform future planning controls in Council's LEP and DCP. Notably, an area-specific Development Control Plan outlining detailed guidelines around building design including aesthetics, materiality and landscaping to support a higher design outcome for new buildings within Brookvale.

Please be assured that Council will take this feedback into further consideration in the drafting of proposed planning controls to ensure future development proposals meet the vision and objectives of the Plan. There will also be further opportunity to provide Council with feedback in relation to these proposed planning controls to help inform its decision-making.

3.6 Open space and green infrastructure

3.6.1 Increased open space

A total of 20 submissions surrounded the need for more diverse open spaces. The top themes to emerge from a review of this sub-set of submissions, include:

1. Retention, provision, and diversity of open spaces.
2. Suggestions for landscape improvements.

Open space retention and provision

Submissions raised questions about the amount of additional open spaces proposed, highlighting increased densities without the provision of new open space may reduce liveability. The submissions advocated for on-going improvement to existing recreational spaces (including John Fisher Park, Brookvale Oval, Greendale Creek, Allenby Park) to make sure they are safe, accessible and support the changing needs of Brookvale. Some submissions also expressed support for more off leash areas for dogs.

Council response

Council is continually working to expand green spaces and to strengthen connections to them. The Structure Plan requires the provision of 5,000sqm of open space in the form a town square, which will serve passive recreation functions for the incoming community. Within the draft Brookvale Structure Plan area, most developed open space falls within Brookvale Park, which provides green open space, a District playground, and dedicated spaces for basketball, cricket, and fitness. The sports field is also available for public access and bookings when not being used by the Manly Warringah Sea Eagles. Green Street Park also provides local open space, including a popular playground. Several larger public open space areas are also available to Brookvale residents, including Allenby Park to the west, which provides natural open space and a tranquil setting for a walk through the rainforest and a picnic and John Fisher Park to the east, which provides extensive green open spaces and associated activities.

As part of the planning proposal process for Brookvale, a draft Contributions Plan will be prepared to levy local contributions from future development that will create additional demand on existing local infrastructure, including public open space. These contributions will partly go toward future upgrades and/or improvements of the existing public open space network to ensure this social infrastructure can meet the expected increase in demand over time.

Further, Council is seeking to create a new town square within the core of Brookvale. The location of this space intends to enhance Brookvale's natural and green grid, make use of its proximity to the B-Line stop, help with water management, and serve as an anchor for the community's future commercial, civic, and entertainment hubs. This area is expected to be very active, serving as a gathering spot for locals, workers, and visitors as well as a potential venue for community activities.

Improvements to landscaping

Submissions recommended that more native species be incorporated into public domain landscaping. The submissions acknowledged the urban heat island effect and recommended an increase in tree canopy, green walls and rooftop gardens for new and existing buildings.

Council Response

Historical development of Brookvale has delivered limited greening and tree canopy cover that has resulted in a low-amenity environment, which suffers from the urban heat island effect. In preparing the Draft Brookvale Structure Plan we have sought to improve canopy coverage through planting street trees in streets identified as 'green links' on the draft Brookvale Structure Plan map. This outcome is intended to be realised through the draft Brookvale Structure Plan's following action:

- **Action 1** - Prepare an Urban Tree Canopy and Greening Strategy for Brookvale to inform planning controls to increase urban tree canopy along streets, public open spaces and as part of new buildings, while maintaining suitable access for vehicles within Industrial East and West. The Strategy should identify a heat resilience rating for the identified Green Links to establish a baseline for future monitoring.

This action will lead to the preparation of future technical studies as part of the planning proposal process which will inform future planning controls for development in Brookvale.

Ecological impacts

Submissions raised questions surrounding the environmental impacts of the proposed density particularly surrounding impacts to local creeks, bushland reserves, and wildlife corridors. The submissions also highlighted the potential loss of habitats and biodiversity.

Council Response

Under the draft Brookvale Structure Plan, areas proposed for additional density are largely within the most urbanised part of Brookvale, where existing development has already occurred. Despite this, any future development proposal for higher density will be expected to demonstrate how it has considered any potential environmental impacts and approaches to mitigate this impact. To ensure this occurs, Council's DCP currently has a range of planning controls around the natural environment, which will continue to apply to future development in Brookvale.

Further, as part of the planning proposal process, future planning controls will be investigated to encourage new developments to deliver additional landscaping and increased urban tree canopy outcomes which will further increase potential habitat for biodiversity. This is reflected by the following action of the draft Brookvale Structure Plan:

- **Action 1** - Prepare an Urban Tree Canopy and Greening Strategy for Brookvale to inform planning controls to increase urban tree canopy along streets, public open spaces and as part of new buildings, while maintaining suitable access for vehicles within Industrial East and West. The Strategy should identify a heat resilience rating for the identified Green Links to establish a baseline for future monitoring.
-

3.6.2 Town square

A total of 9 submissions surrounded the proposed Brookvale town square. The top themes to emerge from a review of this sub-set of submissions, include:

1. Environmental impact assessment.
2. Incorporation of green and communal spaces within the Town Centre.
3. The siting and delivery of the Town Centre.

Amenity of the future town square

Submissions recommended that further studies are undertaken to ensure a suitable amenity outcome for the proposed town square be undertaken.

Council response

The purpose of a Structure Plan is to provide the long-term vision and planning framework to guide future development. The proposed mixed use area on the Warringah Mall site has been expanded to allow flexibility in the shape and design of the town square as part of a future masterplanning process. If the revised draft Brookvale Structure Plan is adopted by Council, the next phases of work will focus on the detailed planning controls for the new town square and the buildings around it to ensure high standards of amenity. Additionally, the existing Development Control Plan will be amended, outlining detailed planning and design guidelines around solar access for the new square, along with additional requirements for tree canopy and greening and stormwater management.

Provision of open space within Town Centre

Submissions raised questions surrounding the amount of green and communal spaces incorporated into the town square. The submissions suggested additional community and culture spaces that would facilitate activation through pop up markets and busker areas, water features, street art and benches. Some submissions also mentioned the need for more diverse and inclusive activities and spaces for seniors, teenagers, and young children.

Council response

The draft Brookvale Structure Plan seeks to increase open space within Brookvale by indicating a new 5,000sqm town square on the Warringah Mall Site. While earmarking this open space as the new focal point for Brookvale, detailed investigations are still to be undertaken as part of the subsequent planning proposal stage to provide further detail on the future design and function of this space. This will include the preparation of an Urban Design Study which will detail an indicative concept for the public domain outcomes within Brookvale, including the town square and how this area can be activated through surrounding land uses, events and facilities.

Siting and delivery of the town square

Questions were raised surrounding the proposed siting and delivery of the Town Centre. There were varying viewpoints on alternative locations including a 'Core' that leverages existing business in Brookvale, that does not displace Bunnings and Medical Centre and that is closer to the B-line bus stop. Other submissions recommended the delivery of the town square before residential development to provide community benefit and facilitate activation of the new town centre.

Council response

The proposed location of the town square seeks to refocus development to the west of Pittwater Road to establish a cluster of activity and greater amenity around the B-Line stop and Dale Street south as a new High Street. The location of this space intends integrate with a new multipurpose community facility, enhance Brookvale's natural and green grid, make use of its proximity to B-line bus service as well as cycling and walking connections, help with water management, and serve as an anchor for the community's future commercial, civic, and entertainment hubs.

3.7 Social Infrastructure

A total of 33 submissions surrounded social infrastructure provision and diversity. The top themes to emerge under this category, include:

1. Growth impacts on educational facilities.
2. Provision and diversity of existing social infrastructure.
3. Integration of public art.

Growth impacts on educational facilities

Questions were raised surrounding growth impacts on local schools and childcare facilities. The submissions noted that many are already at capacity. Submissions also mentioned potential strain on road networks around hospitals and schools.

Council Response

The Draft Brookvale Structure Plan provides a high-level concept plan so that Council we can seek feedback before progressing with more detailed planning. During this consultation process Council has sought feedback from a range of State Government agencies including School Infrastructure NSW (SINSW), TAFE NSW and the NSW Department of Planning and Environment on this draft plan.

School Infrastructure NSW has provided comments assuring Council, they will continue to monitor the capacity of existing school sites to accommodate future student demand proposed under the draft Brookvale Structure Plan. Further SINSW has requested to be continuously engaged throughout the draft Brookvale Structure Planning process to ensure schools are compliant with Department of Education policy guidelines.

The draft Brookvale Structure Plan has been developed based on careful consideration of the 2021 Brookvale-Dee Why Transport Management and Accessibility Plan which includes updated traffic modelling to determine the potential for additional homes and jobs without causing undue traffic congestion specifically around hospitals and schools.

Provision and diversity of social infrastructure facilities

Questions were raised surrounding the diversity of social infrastructure. The inclusion of high-quality, large venues to accommodate theatre and arts programming as well as new facilities for seniors, the unemployed, children and teenagers in the Northern Beaches were advocated for.

Council Response

The revised plan seeks to guide the future development of facilities and spaces that accommodate a range of activities for all ages. Council also recognises there is an opportunity to support creative activities within local community facilities and may be appropriate to consider as part of the design of any multi-purpose community facility within Brookvale.

Council is also investigating opportunities to support the delivery of dedicated and affordable workspaces for cultural and creative industries and partnerships with local education facilities through potential grant and sponsorship programs.

Integration of public art in Brookvale

Submissions advocated for the inclusion of public art within the plan.

Council Response

The Draft Brookvale Structure Plan seeks to provide a high-level structure plan and has been informed by a range of existing Council strategies, including the Northern Beaches Arts and Creativity Strategy published in 2019. The Strategy presents three key outcomes supported by nine strategies to cultivate creativity, identify opportunities for arts and cultural expression and connect our diverse communities. The strategy comprehensively addressed how

Council has and will continue to encourage the integration of public art through a range of initiatives including the recent implementation of Public Art Policy, the establishment of a Public Art Selection Panel and the drafting of new guidelines to encourage public art in private developments. The formal integration of public art projects will be considered during the detailed design work that will come at later stages of this project.

3.8 Environmental considerations

3.8.1 Sustainability

A total of 39 submissions surrounded sustainability initiatives. The top themes to emerge from a review of this sub-set of submissions, include:

1. Support for the integration and incentivisation of renewable energy generation and use
2. Suggestions for adoption of environmental rating systems and targets

Support for the integration and incentivisation of renewable energy

Submissions supported the integration and incentivisation of renewable energy generation and use through the expansion of solar panels on industrial roofs, commercial car parks and public buildings. The submissions further advocated for the inclusion of electric vehicle (EV) charging, car share and the electrification of public transport (electric buses).

Council Response

In Brookvale, rooftop solar panels have become a typical design element for many buildings, demonstrating the shift towards a more sustainable built environment. This is expected to continue as new development offers the chance to incorporate more effective and sustainable solutions for living and working. Council will continue to promote stronger sustainability standards in new buildings which will be guided by new planning controls, through the following action of the draft Brookvale Structure Plan:

- **Action 18** - Develop an environmental sustainability strategy for Brookvale to inform future planning controls for new development, which is to include new buildings being net zero emissions and the development of a low carbon community with high energy and wastewater efficiency.

The environmental sustainability strategy will investigate how we can design and construct buildings for net zero emissions and deliver a low carbon community.

One of the key strategies of the Draft Brookvale Structure Plan to minimise the traffic impacts arising from new development is the introduction of maximum car parking rates for future development. Maximum car parking rates are used to ensure that parking is not oversupplied and promotes the use of sustainable forms of transport. Under Action 17 of the Brookvale Structure Plan, Council will implement a requirement for provision of dedicated car share spaces and electric vehicle parking spaces as part of new development.

Suggestions for adoption of environmental rating systems and targets

Submissions sought further clarification for sustainability initiatives and stronger net zero emission commitments. The submissions suggested the implementation of mandatory 5-6 green star rating for all new buildings.

Council Response

Action 18 of the draft Brookvale Structure Plan looks to the preparation of an Environment Sustainability Strategy for Brookvale which investigates how we can ensure buildings are constructed to contribute to net zero emission commitments and the delivery of an efficient low carbon community. This strategy will investigate what sustainability targets (e.g. Green Star Building ratings) are appropriate for new development in Brookvale, which will inform future planning controls contained within Council's DCP.

3.8.2 Amenity Impacts

A total of 47 submissions surrounded potential noise impacts and possible solutions in Brookvale. The top themes to emerge from a review of this sub-set of submissions, include:

1. Acoustic impacts and conflicting land use.
2. Potential wind tunnel impacts.

Acoustic impacts and conflicting land uses

Questions were raised surrounding the acoustic impacts of new development as well as existing land use tensions between residential development and breweries and live music venues. A number of noise mitigation measures were proposed including absorbent technologies like double glazed windows for existing and new housing.

Council Response

The draft Brookvale Structure Plan seeks to encourage creative industries to be closer to existing high activity areas to manage any impact of creative-led gentrification in the industrial area. An initiative to manage this impact is to encourage these uses toward Pittwater Road and Roger Street where cultural and creative industries can cluster, collaborate, and grow.

Council has noted the suggestions surrounding noise mitigation measures however, this is outside the scope of the current project stage of the draft Brookvale Structure Plan. Once the Brookvale Structure Plan has been adopted by Council, the next phases of work will focus on the detailed planning controls for new development. This will include the preparation of an area-specific Development Control Plan where specific controls relating to noise mitigation may be included for new mixed use or residential buildings to manage potential noise emissions from surrounding uses such as industrial activities and live music venues.

Wind tunnel impacts

Questions arose surrounding the potential wind tunnel effect caused by the proposed high rises.

Council Response

Concerns regarding wind impacts within Brookvale is noted. Excessive wind conditions are typically experienced within highly intensive urban areas, for example in Sydney CBD where large scale tower buildings (e.g. 20+ storeys) are clustered in close proximity where wind tunnel effects can occur. This is unlikely to be seen in Brookvale with the relatively lower buildings heights earmarked by the draft Brookvale Structure Plan (up to 15 storeys).

3.8.3 Stormwater and Flooding

A total of 5 submissions surrounded the adequacy of existing and future provision of drainage infrastructure.

Existing and future drainage systems

Submissions raised questions around existing and future provision of drainage infrastructure. Specific questions were in relation to current flood-prone areas and corresponding mitigation measures.

Council Response

The Draft Brookvale Structure Plan seeks to integrate natural elements through the provision of at-grade open space, providing the opportunity to unveil and reinterpret natural waterways and corridors. This is especially relevant for the proposed town square at the Warringah Mall site which will incorporate a high level of landscaping with adequate tree pits, permeable pavement treatments, swales, and bio-retention to play a flood mitigation role.

While detailed stormwater infrastructure improvement is considered to be outside the scope of the current project stage, the next phases of work will involve several important tasks in relation to stormwater and flood management. This includes the preparation further technical studies to assess existing and required stormwater infrastructure to support this level of growth. Further, an area-specific Development Control Plan will be developed, where specific controls will address flood requirements for new buildings. During the development application stage, applicants will

be required to comply with these controls and provide a detailed assessment of any potential flood impacts as a result of their development.

Additionally, a Development Contributions Plan will be established to levy development for community services and infrastructure. It is likely that within this plan there will be mandatory contributions for private developer to fund any required stormwater drainage infrastructure for Brookvale.

4.0 Key Stakeholders

This section of the report provides an overview of comments received during public exhibition of the Draft Brookvale Structure Plan and technical studies from key stakeholders. Respondents include representatives from government agencies, non-governmental organisations, and consultants representing a variety of landowners.

4.1 Government agency submissions

The following sub-sections respond to the key matters raised by government agency submissions.

NSW Department of Planning and Environment

The Department of Planning and Environment (DPE) noted that the proposal is generally consistent with the North District Plan. DPE requests that Council responds to the Transport for NSW submission and provide them with the required modelling outputs.

It was noted that the proposed SP4 zone permits seniors housing, and this may not provide an appropriate buffer to the adjoining IN1 zoned land. The potential conflict between creative and industrial uses was also mentioned. DPE requests consideration of a tree canopy target for the precinct.

The submission also queried whether additional open space would be required beyond 5,000sqm.

Council Response

Council is currently engaging with Transport for NSW as part of this exhibition process to seek feedback on the proposed plan.

Regarding the draft Brookvale Structure Plan's recommended SP4 zone on Dale Street, this is no longer considered appropriate due to land use conflict concerns related to state government policies on seniors housing. Retaining the existing E4 General Industrial zone with additional permitted uses for business premises and office premises will ensure that land use conflict is minimised.

While the value of delivering more open space is recognised, the ability to deliver new public open space is constrained given the highly fragmented lot ownership within the precinct, and the high land values which limits Council's ability to acquire land for public open space. The draft Brookvale Structure Plan aims to create a new town square as part of any future redevelopment of the Warringah Mall site, which benefits from a large, consolidated landholding within the precinct to facilitate the delivery of new public space. This will serve as an anchor for the community's future commercial, civic, and entertainment hubs. This area is expected to be very active, serving as a gathering spot for locals, workers, and visitors as well as a potential venue for community activities.

Furthermore, as part of the planning proposal process for Brookvale, a draft Contributions Plan will be prepared to levy local contributions from future development that will create additional demand on existing local infrastructure, including public open space. These contributions will partly go toward future upgrades and/or improvements of the existing public open space network to ensure this social infrastructure can meet the expected increase in demand over time.

Northern Sydney Local Health District

Northern Sydney Local Health District (NSLHD) supports increase in housing diversity and affordability while protecting employment lands as it will enable people to work close to where they live and bring life & vibrancy outside normal working hours.

NSLHD requests the following:

- Overhead walkway across Pittwater Rd, between Cross St & Winbourne Rd intersection
- Provide seating and shelter when activating Winbourne Rd car park.
- Supply bike racks in visible, accessible locations, particularly in town square

- Design stairs to be accessible, user friendly and visible.
- Allow provision of fresh fruit & vegetables in town square
- Encourage small farmers markets in the town square or Winbourne Rd car park
- Investigate street play initiatives to activate the industrial centre on weekends
- Provide drinking water fountains in town square
- Ensure passive surveillance is optimised by lighting and use of shrubs which do not obstruct lines of sight
- Ensure planting uses local native flora
- Prioritise street tree planting, particularly in industrial centre
- Future proof play grounds using climate smart design & surfaces that reduce heat impacts
- Set minimum 40% tree canopy coverage for suburb
- Encourage green and blue infrastructure, renewable energy sources for lighting, pavement surfaces that can cope with urban heat and extreme weather
- Ensure the school and its community are consulted
- Review current bicycle and footpaths to enable safe cycling and walking to school
- Ensure town square and parks include multipurpose spaces that encourage intergenerational recreation
- That dwellings adhere to checklist Health Higher Density for Kids

Council Response

The recommendations provided by the NSLHD is noted. The purpose of the draft Brookvale Structure Plan is to provide the long-term vision and framework to guide future land use and density decisions within Brookvale. Once the revised Draft Brookvale Structure Plan has been adopted by Council, the next phases of work will involve several important tasks. These include the preparation of a Planning Proposal and accompanying technical studies to inform future planning controls in Council LEP and DCP.

Council will consider the feedback provided by NSLHD as part of the preparation of more detailed planning controls for the precinct (during the planning proposal phase) which will aim to align with the recommendations provided in its submission.

Investment NSW

Investment NSW supports an integrated arts, industry, and entertainment precinct for Brookvale.

Council Response

Creative businesses will continue to be supported across Brookvale depending on their predominant types of activity. Creative industrial uses including creative production and high technology industry (such as video production, recording studios, artist studios and set design) will continue to be supported in the industrial zone noting the need to prioritise the industrial zone for industrial uses that are unable to locate in other zones.

Non-industrial creative businesses will be supported with opportunities for retail showrooms, makerspaces and performance spaces along Pittwater Road and Roger Street closer to the B-line and where there will be stronger visibility and access by the public.

Professional creatives (like architects, graphic designers, marketing, product development, engineering) will be supported with high quality professional office floorspace close to the B-line and amenity of Warringah Mall while still retaining easy access to nearby supporting industrial functions including manufacturing, fabrication, printing and wholesale suppliers for a more networked and integrated supply chain.

NSW Environment Planning Authority (EPA)

NSW EPA recommends the following:

- Odour, air and noise impacts within 800m of Harrisons Manufacturing - consider the potential for odour generated from this facility, which is regulated by the EPA to undertake the scheduled activity of petroleum and fuel manufacturing
- Undertake noise, air and odour impact assessments to inform detailed design e.g. buffer distances, transitional zoning
- Noise impact assessment to be completed for developments at Old Pittwater Rd, as per SEPP (Transport & Infrastructure) 2021
- Undertake a preliminary site investigation for the precinct as per SEPP 55 and engage a site auditor
- Reference the Department of Planning's 'NSW Waste and Sustainable Materials Strategy 2041, Stage 1: 2021-2027, NSW'
- Consider increased volumes of waste resulting from increased growth and how this can be managed sustainably
- Consider current capacity of current sewage treatment plant and any potential impacts from sewer overflows - consult with Sydney Water

Council response

The recommendations provided by the NSW EPA is noted. Once the revised Draft Brookvale Structure Plan has been adopted by Council, the next phases of work will involve several important tasks. These include the preparation of a Planning Proposal and accompanying technical studies (such as an noise and odour study, and environmental sustainability study) to inform future planning controls in Council LEP and DCP. Council will consider this feedback as part of the preparation of more detailed planning controls for the precinct (during the planning proposal phase).

Sydney Water

Sydney Water raised no objection to the proposed uplifts as water and wastewater systems should have sufficient high-level capacity to accommodate the anticipated growth, noting the amplifications and adjustments may be needed within the neighbourhood centre and surrounding growth.

It was noted that there are some high-risk overflow structures and if development will impact on these, further detailed assessments will be needed. Future developments should be referred to Sydney Water at the Planning Proposal stage and for Development Applications over 100 dwellings and where building pipes are DN300mm and above. Requests that dwelling forecasts and expected timing is provided to Sydney Water.

Council response

The recommendations provided by the Sydney Water is noted. Once the revised Draft Brookvale Structure Plan has been adopted by Council, the next phases of work will involve several important tasks. These include the preparation of a Planning Proposal and accompanying technical studies (such as an noise and odour study, and environmental sustainability study) to inform future planning controls in Council LEP and DCP. Council will consider this feedback as part of the preparation of more detailed planning controls for the precinct (during the planning proposal phase). Sydney Water will be contacted to provide further comment on any future planning proposal prepared for Brookvale.

Transport for NSW

As part of Transport for NSW's submission, detailed comments are provided and a request that the comments are satisfactorily addressed and/or considered by Council in the finalisation of the draft Brookvale Structure Plan. Specific comments were provided on all transport upgrades identified in the TMAP and suggested the following improvements and upgrades:

- Re-allocation of road space within Cornish Ave to provide one westbound lane and two eastbound lanes between Willandra Rd & the Caltex driveway - remove the kerbside parking eastbound and complete some widening to convert the Cornish Ave eastbound approach to Willandra Rd to three lanes.

- Upgrade of Allambie Rd/Rodborough Rd roundabout to traffic signals - does not support signalling the existing roundabout as this is too close to the intersection of Allambie/Warringah Roads
- Traffic signals at Harbord Rd/Brighton St - signals can be considered only if it meets certain criteria relating to number of tow-aways or casualty traffic accidents. A roundabout is an alternative approach.
- Grade separation of Pittwater/Harbord Rd intersection - TfNSW has no current plans or funds to pursue this.
- Extension of short southbound lane on Willandra Rd from Warringah Rd to Cornish Ave by reducing the adjacent northbound carriageway from two lanes to one lane - northbound lane needs to be a minimum 5m wide, need to conduct a concept design to confirm upgrade is feasible as property acquisition may be needed, model to confirm there is no queuing along the northbound carriageway which would impact on Warringah Rd, consider converting southern leg of Willandra Rd to two lanes approaching Warringah Rd
- New northbound left turn lane on Harbord Rd between Abbott Rd & Winbourne Rd - check proposed L/LT movement to see if dual left turn, turn paths comply with requirements.
- Beacon Hill Rd/Warringah Rd intersection upgrade - Beacon Hill Rd left turn slip lane changing to two signalised left turn lanes - preference is to have only the signalised dual left turn out of Beacon Hill Rd and to ban right turn movements from Beacon Hill Rd approach onto Warringah Rd
- Pittwater Rd/ Cross St/ Powells Rd extension - not supportive as this would significantly impact on bus depot operations and it is highly likely that the right turn phases onto Cross St and Powells Rd would create the greatest constraint for Pittwater Rd in Brookvale
- Pittwater Rd/Old Pittwater Rd/Winbourne Rd right turn ban - further modelling/consultation is needed as a large number of vehicles will need to find alternate routes and the impacts will fall on local roads i.e. Dale & Green Streets
- Pittwater Rd/Mitchell Rd - need to connect the missing bus lanes, rationalise right turn movements and remove unsignalised intersections.
- New traffic signals adjacent to schools - all legs need to have signalised pedestrian crossings
- Noted that infrastructure plans will need to identify funding responsibilities as part of the next phase of the project.
- **Transport modelling** - require a copy of the latest modelling outputs by submitting the latest 2026/2036 Aimsun modelling files to TfNSW for review/comment and to provide an Appendix to the TMAP prior to lodgement of a Planning Proposal; unreleased threshold target of 1% needs to be increased to 3%.
- **Travel Demand Management (references in TMAP)** - suggested changes to how this is referenced in the TMAP and the need to ensure mode shift occurs with the existing population as well. TfNSW support a Council or Developer led funded demand management/customer behaviour.
- **Analysis Report** - barrier of Pittwater Rd will need to be addressed to promote active transport models.
- **10% mode shift** - further evidence needs to be documented to ensure that this is achievable.
- **Maximum parking rates** - additional analysis is required to produce some benchmarking analysis of car parking rates, average census car ownership, rates per dwelling (suburb based), current car parking vs proposed rates. These rates should be compared to similar centres which align with 10% mode shift.
- **Loading & Unloading** - investigate having this off street and provide separation for private vehicles and pedestrian activity for improved safety.
- **Active Transport** - a strategy is recommended to address transport network severance across the five precincts and identify high-priority road crossings for active transport, identify specific projects that can be funded by developer contributions, identify measures to reduce through-traffic, indicate streets suitable for traffic calming or re-design, reference various TfNSW policy documents, include a transit oriented development strategy to ensure high growth in walking trips to public transport.

Council Response

TfNSW has agreed to most of the traffic-related upgrades in the TMAP (and hence within the draft Brookvale Structure Plan) with some minor changes or design details to be confirmed as part of the ongoing design development of individual projects. Most of the minor changes suggested are reasonable to either incorporate as part of the design of these upgrades or to monitor and consider at a later stage based on revealed traffic performance changes.

The Structure Plan has been revised to remove the Powells Roads extension and green link, and to remove the bus depot as an area subject to future investigation.

TfNSW has requested additional research to quantify the assumed 10% modal shift from private vehicles in the draft Brookvale Structure Plan Analysis report. Such a study would be complex and expensive and would necessarily involve stated preference surveys or similar. The benchmarking approach suggested by TfNSW would not be effective because modal choice is not only influenced by parking supply, it is also a complex trade-off between travel times and costs of alternative route-mode paths best determined through choice modelling. The only choice model available is the STM which is too coarse to be sensitive to the local TDM and active transport initiatives being considered under the draft Brookvale Structure Plan. Rather, the assumed 10% shift reflects the level of potential private vehicle demand that is not being planned for/accommodated by the draft Brookvale Structure Plan such that these trips are encouraged to remode, consistent with TfNSW's 'vision and validate' approach.

It is noted that once the Brookvale Structure Plan has been adopted by Council, the next phases of work will focus on the detailed planning controls and contributions framework for new development in Brookvale. This will include the preparation of a Transport Study which will provide:

- further evidence to ensure a 10% travel mode share is achievable
- benchmarking analysis of car parking rates, average census car ownership, rates per dwelling (suburb based), current car parking vs proposed rates in similar centres which align with 10% mode shift
- proposed maximum parking rates for Brookvale
- opportunities for private vehicles and pedestrian activity for improved safety
- strategies to address:
 - the transport network severance across the five precincts and identify high-priority road crossings for active transport,
 - specific projects that can be funded by developer contributions,
 - measures to reduce through-traffic,
 - streets suitable for traffic calming or re-design,
 - TfNSW's current policy documents,
 - how walking trips to public transport can be improved.

Ausgrid

Ausgrid requests that the next stage of the project includes a Services and Utilities Impact Assessment to identify any upgrades that would be required and how any potential impacts would be managed.

Council Response

The recommendations provided by the Ausgrid is noted. Once the revised Draft Brookvale Structure Plan has been adopted by Council, the next phases of work will involve several important tasks. This includes the preparation of a Planning Proposal and accompanying technical studies to inform future planning controls in Council LEP and DCP. As part of the suite of technical studies prepared as part of the planning proposal, a Services and Utilities Impact Assessment will be prepared.

NSW Department of Education, School Infrastructure NSW

Notes that SINSW will continue to monitor the capacity of existing school sites to accommodate future student demand proposed under the Draft Brookvale Structure Plan.

Heritage listings of schools and within vicinity of schools - requests review of actual listing as the significance often relates to a portion of the site (not the entire site). Revising the area identified will allow alterations and additions to be undertaken as exempt and complying development under SEPP (Transport and Infrastructure).

Requests continued involvement in the draft Brookvale Structure Planning process to ensure that schools comply with relevant DoE policy guidance.

Regarding the TMAP - generally supportive of road upgrades with the following improvements for consideration:

1. Footpaths to be installed and both sides of streets around school sites
2. Traffic signals on bicycle routes across classified roads to be upgraded to include bicycle lanterns
3. Review walking access to bus stops & include weather protection at bus stops
4. Option 4.01 extension of left turn lane in Willandra Rd to Cornish Ave - not supported as this will create worse pedestrian conditions
5. Option 4.02 convert Willandra Rd to one-way southbound road between Cornish Ave & Warringah Rd - not supported as this will increase traffic-pedestrian conflict at the pedestrian crossing at Tristan Rd
6. Option 4.03 upgrade another north-south road to a collector road to relieve pressure on Willandra Rd - supported
7. Left turn slip lane from Old Pittwater Rd to Pittwater Rd - not supported as this may make pedestrian crossing at the intersection more difficult due to the triangular island which is small
8. Include the following information - emphasise bus capable roads that facilitate access to local schools, commentary on active transport links to existing and future school sites, information on bus serviceability including proposed levels of frequency to support student and parent onward journeys, consider movement and place principles

Council Response

The recommendations provided by the Schools Infrastructure NSW is noted. Feedback specifically in relation to the TMAP has been considered by Blitzios and will be further considered as part the subsequent planning proposal phase which will include the preparation of a detailed Transport Study. Any change to a heritage listing would need to be accompanied by a heritage assessment and updated Heritage Data Form for consideration by Council. Further engagement with Schools Infrastructure will be undertaken as part of this subsequent process.

4.2 Non-government organisation submissions

The following sub-sections respond to the key matters raised by submissions from non-government organisations.

Sydney Alliance Northern Beaches

Sydney Alliance Northern Beaches raised a concern surrounding the 5% threshold for affordable housing and has requested that this be increased to 10%, in line with Council's 2019 Affordable Housing Contributions Scheme.

Council Response

As part of the preparation of the Draft Brookvale Structure Plan, higher rates of affordable housing have been tested. However, we must be able to show that affordable housing contribution rates are viable and will not affect development feasibility. In order to attain a higher percentage, we would need to further increase to proposed density and the number of dwellings within Brookvale, which at this point in time, cannot be accommodated by the existing road network.

Given this constraint, any new residential floorspace is proposed to have 5% of it designated for affordable rental accommodation, which has been tested to confirm that a viable development outcome can be achieved. This could result in the delivery of about 65 apartments for affordable housing. Council is committed to continue to investigate further opportunities to increase the provision of affordable housing throughout the Northern Beaches local government area.

Bridge Housing

Bridge Housing expressed support for the housing planned along Pittwater Road and near the B-line. They welcome the opportunity to look at sites in Narrabeen and Narrabeena. They understand why the 5% threshold for affordable housing was selected.

Council Response

Bridge Housing's feedback is noted.

Brookvale Arts District

The Brookvale Arts District (BAD) is a community organisation comprised of individuals, companies and institutions representing all types of industry to maintain, enhance and advocate for the existing creative and industrial fabric of Brookvale. Its submission on the draft Brookvale Structure Plan highlights the following:

- opportunity to designate BAD as a Special Entertainment Precinct to boost nightlife and live music
- support for the Plan's ideas for community events/activation on Council-owned lands including the Council Car Park
- investigate live-work options for BAD in strategic locations in the industrial east, to activate the district and to provide affordable spaces for our creative community to live and work
- remove parking minimums to reduce emissions, encourage walking/cycling/transport use and improve place outcomes
- opportunity to celebrate our identity in the streetscape and public space through industrial/surf style wayfinding, materiality, lighting, signage, art, rain gardens and other identity markers
- support the draft Brookvale Structure Plan's objectives to improve street and laneway connectivity and enhance pedestrian and cycle amenity through Brookvale.
- Orchard Road & Powells Road are BAD's destination streets due to many entertainment venues located there. Similar to Council's planned Dale Street extension on the western side of Pittwater Road, we see opportunity to designate and design Orchard Road & Powells Road as pedestrian-oriented 'high streets' and BAD's preeminent public spaces for activation.

Council Response

We note and welcome BAD's submission to further promote Brookvale's night time economy. While Brookvale has naturally established an emerging creative and night-time economy, it is important to recognise Brookvale's role as the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. This is reinforced by the Greater Cities Commission's retain and manage policy which applies to all industrial zoned lands within the North District to protect Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones.

The eastern industrial area's brewery scene can continue to grow its live music offering to support the primary manufacturing activities, however implementing broader planning changes to Brookvale's industrial zoned lands to allow for stand-alone restaurants, pubs, live music venues, nightclubs, theatres or other performance-based entertainment could displace industrial activities which are already competing for space within Brookvale. Regarding the Special Entertainment Precinct (SEP) designation, to apply a special entertainment precinct over any part of Brookvale's E4 land suggests support for conversion to non-industrial uses which is considered inappropriate for Brookvale's industrial lands.

Further detailed investigations into improvements to the public domain, wayfinding, public art and car parking rates within Brookvale will be investigated further as part of the planning proposal process. This process will seek to identify new planning controls to deliver these improvements.

Solar Alliance

Solar Alliance put forward several requests surrounding renewable energy and the shift toward net-zero. Key priorities included the adoption of a net zero emission policy and "Urban Renewal Energy Zone", the mandatory installation of solar panels for new development and car parks with more than 35 spaces, and calls for a new tariff structure with Ausgrid and the NSW government to incentivize the production of locally produced renewable energy.

Council Response

In Brookvale, rooftop solar panels have become a typical design element for many buildings, demonstrating the shift towards a more sustainable built environment. This is expected to continue as new construction offers the chance to incorporate more effective and sustainable locations for living and working.

We'll keep pushing for stricter sustainability standards in new buildings. These conditions are described in Action 18 of the Draft Brookvale Structure Plan. The need to improve local planning controls to ensure buildings are sustainably designed and built is one of these actions, as is the requirement to carry out future work to develop an environmental sustainability strategy, which will investigate how we can ensure buildings are constructed to net zero emissions and the delivery of a low carbon community.

Clean Energy for Eternity

Clean Energy for Eternity put forward several requests surrounding solar panels. Key priorities include the implementation of new targets for solar panels, the mandatory installation of solar panels for car parks with more than 35 spaces (e.g. Warringah Mall), and requests that Brookvale be made a carbon positive precinct.

Council Response

In Brookvale, rooftop solar panels have become a typical design element for many buildings, demonstrating the shift towards a more sustainable built environment. This is expected to continue as new development offers the chance to incorporate more effective and sustainable locations for living and working. Council will continue to promote stronger sustainability standards in new buildings which will be guided by new planning controls. This will aim to give effect to the following action of the draft Brookvale Structure Plan:

- **Action 18** - Develop an environment sustainability strategy for Brookvale to inform future planning controls for new development, which is to include new buildings being net zero emissions and the development of a low carbon community with high energy and wastewater efficiency.

The need to improve local planning controls to ensure buildings are sustainably designed and built is one of these actions, as is the requirement to carry out future work to develop an environmental sustainability strategy, which will investigate how we can ensure buildings are constructed to net zero emissions and the delivery of a low carbon community.

Zero Sydney North

Zero Sydney North expressed support for the plan, specifically surrounding Actions 22 and 23 relating to car share spaces, electric vehicle parking spaces, and developing an environmental sustainability strategy for Brookvale. Their submission also called for new development requirements surrounding rooftop PV capacity and battery storage where appropriate.

Council Response

New requirements surrounding dedicated car share and electric vehicle charging parking spaces as part of new development as well as the development of an environmental sustainability strategy to inform future planning controls for all new developments will be prioritised as short-term wins for the renewal of Brookvale.

As stated in the responses above, in Brookvale, rooftop solar panels have become a typical design element for many buildings, demonstrating the shift towards a more sustainable built environment. This is expected to continue as new construction offers the chance to incorporate more effective and sustainable locations for living and working.

We'll keep pushing for ambitious sustainability standards as part of new planning controls to ensure buildings are sustainably designed and built, which will be investigated further as part of the planning proposal process.

The Art of Wall

The Art of Wall expressed an interest in seeing public art projects be integrated into the plan, specifically in the form of large-scale, hand-painted murals.

Council Response

The Draft Brookvale Structure Plan prioritizes supporting the night-time economy, creative and innovative industries, and public art. This is reflected by the following actions of the draft Brookvale Structure Plan:

- **Action 30** – Provide a new town square of a minimum 5,000 square metres adjacent to the B-line stop and readily accessible to the public. This space should support a combination of hard and soft landscapes, incorporate new trees, seating, public art and play elements, and potentially serve water management and flood mitigation functions
- **Action 37** - Explore opportunities to further enhance the creative hub area, rear laneways and pedestrian through-site links with public art, small scale exhibition and landscaping

The revitalisation of streets and public open spaces presents opportunities to showcase locally made public art to infuse creativity in the public domain. Within the new town square as well as rear laneways and pedestrian through-site links, public art installations are being envisioned. New planning controls for public art requirements will be investigated further as part of the planning proposal phase.

Urban Taskforce Australia

Urban Taskforce Australia requested that all industrial lands within 800 meters of B-line stops be rezoned as mixed-use, allowing for development up to 8 storeys.

Council Response

The Draft Brookvale Structure Plan is not proposing any changes to the zoning or built form controls North of Brookvale Park. In preparing the Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale's road network can accommodate. We have had to focus growth in specific areas close to the B-line and ensure development is feasible to achieve a range of desired outcomes in the public interest, including delivery of employment floorspace, open space, community facilities and affordable housing contributions.

In addition, Brookvale is the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. It is important that we retain and manage Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones.

Live Music Office

The Live Music Office submission makes the case for designating the Industrial Area East a special entertainment precinct under the NSW Local Government Act as well as providing comment on the other character sub precincts in the draft plan. A summary of the comments include:

- Request for clarification as to:
 - what measures are Council intending to ensure the new developments attenuate external sound within these new developments to ensure after-hours uses of restaurants and bars can be accommodated without generating issues for residents and businesses and the community
 - whether there will be an associated guide for development such as a Late-Night Trading Development Control Plan (LNT DCP) within the Northern Beaches Policies and Codes
- Highlighting that the Liquor Amendment (Night-time economy) Act 2020 provides scalable tools to support these actions to promote the night time economy through changes to the exempt and complying development codes and a variation to the state building code for Small Music or Arts Venues
- A request to investigate opportunities to support an enhanced night economy with after-hour uses such as restaurants and bars in the Industrial East sub-precinct. This could be limited to an individual or small number of streets in the sub-precinct.

Council Response

We note the LMO's submission requesting the designation of Brookvale's industrial east sub-precinct as 'Special Entertainment Precinct' along with recommendations to further promote Brookvale's night time economy.

While Brookvale has naturally established an emerging creative and night-time economy, it is important to recognise Brookvale's role as the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. This is reinforced by the Greater Cities Commission's retain and manage policy which applies to all industrial zoned lands within the North District to protect Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones.

While the live music scene in Brookvale is growing in scale and prominence, live music has been predominantly ancillary to a primary industrial use (i.e. breweries), and being ancillary is what makes them permissible under the LEP. The eastern industrial area's brewery scene can continue to grow its live music offering to support the primary manufacturing activities, however implementing broader planning changes to Brookvale's industrial zoned lands to allow for stand-alone restaurants, pubs, live music venues, nightclubs, theatres or other performance-based entertainment could displace industrial activities which are already competing for space within Brookvale.

Regarding the Special Entertainment Precinct (SEP) designation in Enmore (first use of SEP in NSW), this applies to an established and consolidated strip of venues (mainly small bars and restaurants) which are permissible under the E1 zoning in that part of Sydney. To apply a special entertainment precinct over any part of Brookvale's E4 land suggests support for conversion to non-industrial uses which is considered inappropriate for Brookvale's industrial lands.

To promote Brookvale's night-time economy the draft Brookvale Structure Plan seeks to encourage music and other entertainment-based land use activities that are not ancillary to an industrial land use in the proposed Mixed Use areas along Pittwater Road and/or the Core; not in Brookvale's General Industry zoned areas. As part of the subsequent planning proposal process, further investigation into noise management controls for sound attenuation in new/modified residential development will be undertaken to ensure noise and sound emissions can be effectively managed to minimise land use conflict.

Curl Curl Lagoon Friends

Curl Curl Lagoon Friends expressed support for the plan and highlighted the need to carefully consider the landscape, environment, and culture of the area to ensure open and green spaces in the area are appropriately planned for and protected.

Council Response

Our current local planning controls require landscaped area ratios across many low-density residential and business park areas to protect the leafy bushland character and to protect the sense of space between buildings. These characteristics are a big part of why residents and businesses choose to locate in those areas.

The Draft Brookvale Structure Plan also outlines proposed sustainability actions including the development of an environmental sustainability strategy for Brookvale to inform future planning controls and an Urban Tree Canopy and Greening Strategy. The plan intends to enhance Brookvale's natural and green grid and will look at incorporating green infrastructure, like vertical gardens and roof gardens, into new buildings so that they are sustainably designed and built.

4.3 Consultant submissions

The following sub-sections respond to the key matters raised by consultant submissions prepared on behalf of landowners within Brookvale.

ABC Planning on behalf of landowners of Pittwater West sub-precinct

ABC Planning put forward a submission on behalf of a group of landowners within the Pittwater West sub-precinct requesting changes to the planning controls. Their primary interests surround urban design and an increase to the FSR standard from 2:4:1 to 2:6:1 or greater, depending upon the site characteristics. The submission proposed three site specific options for Council's consideration.

Council Response

A review of the options presented in the submission have been reviewed and presents some merit. It is noted that the key limitation of the proposed density in Brookvale are the current traffic constraints, which has required a careful consideration of recommended floor space ratios for areas proposed for uplift.

Based on a review of the recommended FSRs of the draft Brookvale Structure Plan, FSRs within the Pittwater Road sub-precinct have been increased from 2.4:1 to 2.5:1. Atlas Economics have reviewed the supporting Urbis feasibility assessment and have considered the softening of site values since 2020 (reflecting the current cost and higher interest rates environment). Based on this review, Atlas have recommended a marginal increase of FSRs (assuming 5% Affordable Housing) in the Pittwater Road sub-precinct to 2.5:1. The recommended height limit of 8 storeys is proposed to remain the same.

Gyde Consulting on behalf of landowner of 724 Pittwater Rd, Brookvale

Gyde Consulting put forward a submission on behalf of the property owner of 724 Pittwater Rd, requesting it be rezoned MU1 Mixed Use, have an FSR of 2:4:1, and a height limit 30m, consistent with recommendations for land fronting Pittwater Rd between Orchard Rd and Winbourne Rd. The report highlights that the site is within walking distance to public transportation, neighbours services and amenities, and has a rear access lane.

Council Response

In preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale – Dee Why road network can accommodate over the short to medium term. With the available capacity for growth in Brookvale, there has been a considered approach to ensure new housing is located where it is best supported by existing public transport infrastructure and supporting services which has led to the focus of growth in specific areas that are closer to the B-line. Whilst 724 Pittwater Rd is reasonably supported by transport services, it is still a further distance away from the B-line stop and services provided by Warringah Mall.

Furthermore, 724 Pittwater Road, Brookvale is currently zoned E3 Productivity Support, and is considered to be an important land use for the support of the district's industrial and urban services lands. For this reason, it is proposed that the current land use for this site remains for an employment purpose.

BBF Town Planners on behalf of landowner of 638 Pittwater Rd, Brookvale

BBF Town Planners put forward a submission on behalf of the property owners of 638 Pittwater Rd requesting changes to the FSR. The report acknowledges that the site does not currently have an FSR and suggests that the proposed FSR of 2:4:1 be increased to 4:1, allowing for the creation of a new southern gateway to Pittwater Rd that facilitates affordable housing, developer contributions, and addresses water table issues. Other suggestions surrounded relaxing the minimum car parking rate and street wall height.

Council Response

As noted above, in preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale – Dee Why road network can accommodate over the short to medium term. This has required a careful consideration of recommended floor space ratios for areas proposed for

uplift. Based on a review of the recommended FSRs of the draft Brookvale Structure Plan, FSRs within the Pittwater East sub-precinct have been increased from 2.4:1 to 2.5:1 – an increase from 2.4:1 in the exhibited draft Brookvale Structure Plan.

Atlas Economics have reviewed the supporting Urbis feasibility assessment and have considered the softening of site values since 2020 (reflecting the current cost and higher interest rates environment). Based on this review, Atlas have recommended a marginal increase of FSRs (assuming 5% Affordable Housing) in Pittwater Road sub-precinct to 2.5:1.

To increase this FSR to 4:1, would establish a density on this site which moves away from the development principles of the structure to focus the highest growth around the B-line stop. Further, this level of density would likely result in a significant level of dwelling yields which would result in the adverse traffic implications for the Brookvale area.

A review of the car parking rates for Brookvale will be investigated further as part of the planning proposal process. This will be informed by a more detailed Transport Study which will investigate the adoption of maximum car parking rates for the area.

Chipchase Planning on behalf of the landowners of 1 Sydenham and 1 Chard Rd

Chipchase put forward a submission on behalf of the landowners of 1 Sydenham and 1 Chard Rd requesting that the proposed laneway connecting Sydenham Rd and Chard Rd to one block be relocated further east to achieve a more coordinated laneway. They suggest this change could deliver a cosmopolitan greenway with a potential mall like environment.

The Submission recommends additional FSR and heights to attract private investment and make the sites and plan economically viable. It is considered that a greater FSR and the addition of extra height to ten (10) storeys would not have any visual impact on the gateway that Council wants to achieve along Pittwater Road.

Council Response

The submission's concern with regard to the location of the laneway is noted. However, relocating the laneway further east to the adjoining properties would further encroach into existing industrial zoned lands. A focus of the draft Brookvale Structure Plan is to retain and manage Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones. The location and dimensions of the proposed laneway between Sydenham Rd and Chard Rd will be investigated further part of the planning proposal process, which will be informed by an urban design study.

As noted above, in preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale – Dee Why road network can accommodate over the short to medium term. This has required a careful consideration of recommended floor space ratios for areas proposed for uplift. Based on a review of the recommended FSRs of the draft Brookvale Structure Plan, FSRs within the Pittwater Road sub-precinct have been increased from 2.4:1 to 2.5:1 – an increase from 2.4:1 in the exhibited draft Brookvale Structure Plan.

Atlas Economics have reviewed the supporting Urbis feasibility assessment and have considered the softening of site values since 2020 (reflecting the current cost and higher interest rates environment). Based on this review, Atlas have recommended a marginal increase of FSRs (assuming 5% Affordable Housing) in Pittwater Road sub-precinct to 2.5:1. The recommended height limit of 8 storeys is proposed to remain the same.

To increase heights to up to 10 storeys would establish a density on this site which moves away from the development principles of the structure to focus the highest growth around the B-line stop. Further, this level of density would likely result in a significant level of dwelling yields which would result in the adverse traffic implications for the Brookvale area.

Urbis on behalf of Scentre Group, owner of Warringah Mall 145 Old Pittwater Rd

As part of its submission, Scentre Group noted its support for the transformation of the precinct to allow for mixed use opportunities and their willingness to facilitate the public benefits articulated in the draft Brookvale Structure Plan.

Scentre Group requests Council consider the following key recommendations as part of the further development and finalisation of the draft Brookvale Structure Plan:

- An **enlarged spatial footprint** over the Warringah Mall site that goes beyond the NE corner, befitting of the catalyst role the site plays in initiating the precinct transformation.
- Amend the FSR and height controls to **enable an increased scale and density** commensurate with a Town Centre core location and reflect feasibility requirements for the site.
- Allocation of a **greater proportion of housing provision for Warringah Mall in Stage 1**, amounting to approximately 890 dwellings, given the land is generally unencumbered and less constrained than other land within Brookvale. Suggested amendments to the recommended planning controls for the site under the draft Brookvale Structure Plan, included:
 - An amended and enlarged 'core' having a FSR of 2.8:1 (sites 1 and 2) and 2.2:1 (sites 3 and 4)
 - Increase in heights to maximum of 52m (15 storeys) in the northern and southern 'corners' and maximum of 71m (22 storeys) for the central portion fronting Condamine Street.

The submission included masterplan concepts for future development indicating possible building placement and heights, and arrangement of the town square and a central community hub. The concepts included varied building heights north of the town square for solar access, a town square incorporating ground level and elevated public open spaces, and a podium-level connection from the walkway overhead Pittwater Road through to the shopping mall. Traffic and economic feasibility analysis were provided to support the amount of floor space and the dwelling yields proposed. Dwelling yields in Scentre Group's concepts range from 836 to 894. Of this, around 290 dwellings are in the area generally north of the town square that the exhibited Structure Plan identified for Commercial Core/Mixed Use.

Council Response

Distribution of growth

In preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale-Dee Why road network can accommodate over the short to medium term. With the available capacity for growth in Brookvale, there has been a considered approach to ensure new housing is located where it is best supported by existing public transport infrastructure and supporting services which has led to the focus of growth in specific areas that are closer to the B-line.

Notwithstanding the above, the revised Structure Plan also seeks to implement the outcomes of 'Towards 2040 - Northern Beaches Local Strategic Planning Statement' (LSPS). Specifically, the LSPS sets out the following principle for growth in Brookvale:

- *bringing life back to streets, including the revitalisation of Pittwater Road and increasing residential population that will support greater activity.*

While acknowledging Scentre Group's justification for greater density within the Core being aligned with the principles of the draft Brookvale Structure Plan, this needs to be balanced with other competing priorities and limitations identified by the plan for Brookvale, including:

- the traffic capacity constraints identified by the TMAP which has informed the proposed growth of 1,300 dwellings and 975 jobs (or 1,350 new homes and 900 jobs) for Brookvale under the exhibited Structure Plan
- the LSPS' principle to revitalise Pittwater Road, which has informed the Plan's allocation of Brookvale's growth to areas along Pittwater Road and is a key intended outcome.

Given the above, it would be unreasonable for the draft Brookvale Structure Plan to prioritise the allocation of growth to the Warringah Mall site which would undermine the revitalisation of the Pittwater Road corridor.

Furthermore, given the draft Brookvale Structure Plan seeks to support a land use change for part of the Warringah Mall to allow for residential uses, this is considered to be a significant step-change toward Scentre Group's long-term

plans for its site. When balancing the priorities of the plan, the level of growth the plan proposes on Scentre Group's site is considered to be an equitable outcome.

Increased density and traffic analysis

As noted earlier, Scentre Group's justification for greater density on its site needs to be balanced with other competing priorities and limitations identified by the plan for Brookvale. The traffic analysis submitted by Scentre Group has been reviewed. This analysis unfortunately misinterprets how the TMAP findings informed the revised Brookvale Structure Plan and overestimates the allowable population and employment growth. Its traffic generation comparisons do not therefore justify the substantial increase to the planned residential capacity that Scentre Group is seeking.

Feasibility constraints

In response to Scentre Group's concerns relating to feasibility, Atlas Economics have reviewed the supporting Urbis feasibility assessment and have considered the softening of site values since 2020 (reflecting the increased construction cost and higher interest rates environment). Based on this review, Atlas have recommended that a moderate increase of FSRs is appropriate (assuming 5% Affordable Housing), including:

- an FSR of 2.3:1 for the Core (i.e. the Warringah Mall site) an increase from 1.9:1 in the exhibited draft Brookvale Structure Plan. This will be expressed as a maximum residential gross floor area of 26,000sqm and minimum employment gross floor area of 11,000sqm.
- an FSR 2.5:1 for the Pittwater Road and Roger Street sub-precincts – an increase from 2.3:1 and 2.4:1 in the exhibited draft Brookvale Structure Plan.

With this moderate increase of FSRs, the revised homes and jobs targets under the revised Structure Plan has been set to:

- 1,350 homes
- 900 jobs.

The approximate split in terms of dwelling numbers across the three main precincts is:

- Core (Warringah Mall) - 290
- Roger Street - 520
- Pittwater Road - 540
- **Total - 1,350**

The increased dwelling yield for the Warringah Mall site is generally consistent with that indicated in Scentre Group's concept masterplan for the north-eastern part of the site, north of the town square.

The maximum building height recommended in the revised Structure Plan has also been increased to 15 storeys, up from 12 storeys in the exhibited plan, to accommodate Scentre Group's concept which varies building heights north of the town square to improve solar access to the town square. Instead of a single building mass of 12 storeys, heights can be variable with components of 5, 7, 12 and 15 storeys for example, with placement of the shorter components according to shadow analysis with the aim of maximising winter sunlight in the town square. Variation in heights can also add architectural interest and reduce the visual bulk of buildings.

Larger footprint for mixed use development

In acknowledgement of Scentre Group's request for an enlarged spatial footprint beyond the NE corner, an alternate approach is proposed under the revised Brookvale Structure Plan. The Mixed Use area is expanded to provide more flexibility for the arrangement of the town square and the buildings around it, including the possibility of a landmark combined commercial office and community hub building close to the B-line stop and central to the town square. Instead of a nominated FSR, as exhibited, a nominated residential GFA cap (approximately 26,000 sqm) is proposed. The nominated residential cap is equivalent to the amount of floorspace that could be achieved with the increased FSR of 2.3:1, including a minimum employment FSR of 0.7:1, applied to the smaller Mixed Use area that was exhibited. The larger footprint allows more design flexibility, which could assist feasibility, without exceeding the traffic carrying capacity of the road network. It remains important that development occurs in the NE corner first, to facilitate the site's integration with the surrounding urban structure.

To ensure value capture for the community from the significant uplift that the Structure Plan's recommended zoning and land use changes will bring about, the allocation of this residential floorspace for the Warringah Mall site is still tied to the delivery of intended public benefits and good urban design outcomes, with a negotiated Planning Agreement being the preferred mechanism. The revised Structure Plan stipulates that any rezoning to allow residential development in the Core precinct will be contingent on securing via Planning Agreement the delivery of public benefits including the town square, community facility, affordable housing and employment floor space. Design principles include that the town square will comprise formal and informal settings with green open space for passive recreation, be integrated with the community facility, and have good pedestrian connections to the B-line bus stop and pedestrian overbridge.

Long term future growth potential

The revised Brookvale Structure Plan sets carefully defined limits to the amount of residential growth that can be accommodated in the short to medium term, within the limited upgrades road network capacity identified by the TMAP. It is possible that changing conditions since the TMAP was prepared may give rise to further scope for growth in the longer term. A review of recent updates to the NSW government's population projections which capture the influences of the COVID19 period suggests that reduced background growth in the TMAP study area may offer more scope for additional dwellings in Brookvale within the limited upgrades road network capacity (without requiring the major grade separation at the Pittwater Road/Warringah Road intersection).

Any additional scope for dwellings in Brookvale, beyond what the revised Structure Plan contemplates, should logically be focussed on the eastern portion of the Warringah Mall site given its proximity to the B-line and the majority of trip destinations. This highly accessible location represents the best option for minimising private vehicle use and impact on traffic congestion. However, any long-term additional growth would need to be supported by comprehensive traffic analysis. Such analysis would incorporate the latest population and employment forecasts and consider the traffic carrying capacity of the broader road network, particularly the Pittwater Road corridor through Dee Why-Brookvale, along with detailed assessment of localised impacts to identify necessary access points and upgrades to roads and intersections surrounding the site. Any changes involving direct access to or from Pittwater Road would require State Government approval (TfNSW).

Four Towns Planning on behalf of landowners of north-eastern corner of Old Pittwater Rd and Beacon Hill Rd

Four Towns Planning put forward a submission on behalf of a group of landowners requesting that the north-eastern corner of Old Pittwater Rd and Beacon Hill Rd be rezoned from R2 Low Density Residential to R3 Medium Density Residential. A previous submission to Council in December 2017 requested that the lands be rezoned to either R3 Medium Density Residential or B4 Mixed Use. Once amalgamated, this would allow a developer to build a medium to high density building.

Council Response

In preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale – Dee Why road network can accommodate over the short to medium term. With the available capacity for growth in Brookvale, there has been a considered approach to ensure new housing is located where it is best supported by existing public transport infrastructure and supporting services which has led to the focus of growth in specific areas that are closer to the B-line. Lands located on the north-east corner of Old Pittwater Road and Beacon Hill Road are considered to be beyond the proposed areas suitable for uplift in line with the principles of the draft Brookvale Structure Plan.

Urbis on behalf of Centuria

Urbis put forward a submission on behalf of Centuria, the landowner of 114 and 120 Old Pittwater Rd, recommending that lands remain industrial zoned to support an employment-based centre. In addition, the submission supports building heights being increased up to 4 storeys to provide greater flexibility for business expansion and modernised industrial floorspaces.

Council Response

Brookvale is the largest industrial precinct in the North District which has the lowest amount of industrial land per capita in Sydney. It is recognised that it is important that we retain and manage Brookvale's industrial land by prioritising its use by industrial businesses that are unable to locate in other zones.

Brookvale's industrial role and function will be strengthened and protected with an increase in building heights from 11m to 18m encouraging renewal of industrial buildings to better meet the needs of modern industrial businesses. A lot is changing in the world of local manufacturing, distribution, wholesale trade and urban services and it is important we support our local businesses to adapt to new ways of working with the spaces they need.

Planning Direction in relation to drainage reserve in Winbourne Rd

Planning Direction put forward a submission on behalf of a prospective landowner in the area requesting that a strip of land zoned RE1 (currently used for drainage purposes) be rezoned to industrial to reflect the adjoining sites and intention to divert the existing stormwater infrastructure. In addition, the submission requests that the lands be reclassified from community to operational to enable its future purchase and consolidation into industrial use.

Council Response

Upon review of the subject stormwater channel, which is currently zoned RE1 Public Recreation, it currently does not meet the objectives of the zone for public recreation. As such an E4 General Industrial zone being applied to this portion of land would be consistent with adjoining sites and their current land uses, and the wider surrounding area. Reclassifying the land to Operational is consistent with its historic use for stormwater infrastructure and would appropriately reflect its status as an asset held to facilitate the functions of Council and not intended to be open to the general public.

The draft Brookvale Structure Plan will be updated to recommend that drainage channels currently zoned RE1 Public Recreation are zoned E4 General Industrial. A subsequent planning proposal process led by Council will adopt this recommended zoning as part of its suite of planning control amendments. Furthermore, a process to reclassify the drainage channel from community to operational land will be undertaken to correct a historical anomaly when all Council owned land was automatically classified community land and zoned RE1 Public Recreation.

Hatch RobertsDay on behalf of the landowners of 674-698 Pittwater Rd

Hatch RobertsDay put forward a submission on behalf of the landowners of 674-698 Pittwater Rd, requesting that the proposed FSR of 2:4:1 be increased to 4:5:1 and that height limits be raised to a maximum of 12 storeys. This proposal suggests this site is a more appropriate northern gateway site into the town centre with the potential to host a new mixed-use development delivering 1,000sqm town square on the Winbourne Rd car park, 3,857sqm of retail/commercial space, open space on the Winbourne Rd car park, and additional car parking (75-200 spaces).

Council Response

In preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale – Dee Why road network can accommodate over the short to medium term. With the available capacity for growth in Brookvale, there has been a considered approach to ensure new housing is located where it is best supported by existing public transport infrastructure and supporting services which has led to the focus of growth in specific areas that are closer to the B-line.

Based on a review of the recommended FSRs of the draft Brookvale Structure Plan, FSRs within the Pittwater Road sub-precinct have been increased from 2.4:1 to 2.5:1. Further feasibility analysis has been undertaken to confirm the financial viability of this FSR.

To increase this FSR to 4.5:1, would establish a density on this site which moves away from the development principles of the structure to focus the highest growth around the B-line stop. Further, this level of density would likely result in a significant level of dwelling yields which would result in the adverse traffic implications for the Brookvale area. The Winbourne Rd car park serves an important function for nearby businesses and Council intends to retain the parking function and investigate opportunities to hold temporary small-scale activation events in the car park during non-peak times.

BBF Town Planners on behalf of landowners on 1-9 Warringah Road and 19-21 and 25-29 Victor Road

BBF Town Planners put forward a submission on behalf of the property owners of ten contiguous properties requesting changes to their zoning. The report acknowledges that the lands are currently zoned R2 Low Density Residential, are adjacent to properties zoned B5 Business Development Zone, and are within walking distance to public transportation, neighbours services and amenities. The submission requests rezoning of the lands to R1 General Residential or R3 Medium Density Zoning.

Council Response

In preparing the draft Brookvale Structure Plan we have had to consider a range of constraints including limits to the amount of growth that Brookvale – Dee Why road network can accommodate over the short to medium term. With the available capacity for growth in Brookvale, there has been a considered approach to ensure new housing is located where it is best supported by existing public transport infrastructure and supporting services which has led to the focus of growth in specific areas that are closer to the B-line. Lands located in this location are considered to be beyond the proposed areas suitable for uplift in line with the principles of the draft Brookvale Structure Plan.

5.0 Key changes to the draft Brookvale Structure Plan

Based on the feedback received during the public exhibition of the draft Brookvale Structure Plan, several updates are recommended.

Update to recommended floor space ratios

In response to submissions concerns relating to feasibility of recommended FSRs for areas proposed for uplift, Atlas Economics have reviewed its feasibility analysis and have considered the softening of site values since 2020 (reflecting the increased construction cost and higher interest rates environment). Based on this review, Atlas have recommended that a moderate increase of FSRs is appropriate (assuming 5% Affordable Housing), including:

- an FSR of 2.3:1 for the Core (i.e. the Warringah Mall site) – an increase from 1.9:1 in the exhibited draft Brookvale Structure Plan. This will be expressed as a maximum residential floor space with a minimum employment floor space.
- an FSR of 2.5:1 for the Pittwater Road and Roger Street sub-precincts – an increase from 2.3:1 and 2.4:1 in the exhibited draft Brookvale Structure Plan.

These updated FSRs have informed the recommended planning controls in the updated Structure Plan document.

Update to recommended building heights

In response to the increase in FSRs, as described above, a slight increase in building height is proposed for the northern end of the Roger Street sub-precinct – an increase from 7 storeys (27 metres) to 8 storeys (30 metres). The intent is to encourage better urban design outcomes so that the marginal increase in floor space can be allocated carefully and incorporate architectural responses that reduce the overall bulk and scale of buildings. Retaining the 7 storey building height would limit urban design opportunities and potentially limit design approach toward more shorter, but bulkier buildings.

An increase in building height for the Warringah Mall site has also been proposed, which is discussed separately below.

Update to dwelling and jobs targets

The increase of FSRs in the plan, as described above, has required a rebalancing of the target homes and jobs under the revised Structure Plan to limit any adverse impacts to the traffic capacity of the Brookvale-Dee Why area. The revised homes and jobs targets under the revised Structure Plan are:

- 1,350 homes
- 900 jobs.

Update to planning controls for Warringah Mall Site

The revised Brookvale Structure Plan clarifies that any rezoning of the Warringah Mall site to allow for residential development will be contingent on securing via a Planning Agreement the delivery of public benefits, specifically:

- 5,000sqm for a town square
- At least 2,000sqm floorspace for a community facility
- At least 5% affordable rental housing
- At least 11,000sqm of employment floor space.

Design principles have been strengthened to ensure the town square achieves quality urban design outcomes and provides genuine public open space for passive recreation for the growing residential and worker population. Scentre Group's feedback seeks changes to allow a scale of development that would exceed the traffic carrying capacity of the precinct based on the limited suite of road upgrades without the grade separation at the Pittwater Road/Warringah Road intersection.

Given the site's strategic location adjacent to the B-line bus stop, and its potential as a large, single landholding to deliver an important element of the Brookvale Structure Plan (i.e. the Core), an alternate approach is proposed under the revised Brookvale Structure Plan to provide some flexibility, whilst maintaining the traffic capacity of the precinct.

The recommended Mixed Use area has been modified to provide more flexibility for arrangement of the town square and the buildings around it, including the possibility of a landmark combined office and community hub building close to the B-line stop and central to the town square. The expanded footprint responds to Scentre Group's evolving masterplan for the site and allows more design flexibility, which could assist feasibility, without exceeding the traffic capacity of the road network. Instead of a nominated FSR, a residential floorspace cap of 26,000sqm is proposed to apply to the expanded Mixed Use area. The cap offers a moderate increase to dwelling yield that aligns with Scentre Group's concept for the north-eastern part of the site, north of the town square, while keeping the yield within the identified traffic capacity of the road network, without requiring grade separation at the Pittwater Rd/Warringah Rd intersection. An increase to the maximum building height from 12 to 15 storeys is proposed to allow for variation in building heights in a way that improves solar access to the town square and breaks up the visual bulk of buildings.

The revised Structure Plan highlights the importance of development occurring in the NE corner of the site first to facilitate integration with the surrounding urban structure. More detailed planning for future redevelopment of the Warringah Mall site will be undertaken in the next phase of work involving a Planning Proposal for rezoning that will likely involve a negotiated Planning Agreement.

The revised Brookvale Structure Plan identifies several actions that will be implemented through site specific LEP or DCP provisions, ensuring delivery of public benefits and good urban design outcomes. The revised Actions are:

- **Action 3** – Consider measures to manage the impact of noise and vibration from Pittwater Road traffic and industrial land uses while providing natural ventilation for dwellings that face Pittwater Road without creating a harsh architectural response
- **Action 5** – Support buildings of up to 15 storeys in height in the north-east corner of the Warringah Mall site as part of the initial phase of the development and accommodate a mix of commercial office, retail, community uses and residential, on the provision that a 5,000 square metre town square with an area of open space and a minimum 2,000 square metre community facility is provided
- **Action 12** - Adopt wider landscaped setbacks along the southern edge of Cross Street to become a green boulevard incorporating landscaping and water sensitive urban design measures, improved amenity and contribute to the envisaged character of Brookvale
- **Action 24** - Work with the owner of the Warringah Mall site to deliver up to 10% affordable housing contribution levy
- **Action 30** - Provide a new town square of a minimum 5,000sqm adjacent to the B-line stop and readily accessible to the public. This space should support a combination of hard and soft landscapes, incorporate new trees, seating, public art and play elements, and potentially serve water management and flood mitigation functions
- **Action 32** - Encourage opportunities for a standalone commercial office building at the intersection of Pittwater Road & Cross Street, or alternatively commercial office space integrated with a community facility building in a highly accessible and visually prominent location becoming a key landmark with high exposure to vehicles and foot traffic
- **Action 33** - Investigate re-aligning an extended Dale Street as a new high-street, continuing the Brookvale grid via an attractive ground plane and integrating the mall site into the surrounding centre
- **Action 34** - Encourage the built form and pedestrian environment in the Core character sub-precinct to connect to key destinations in the broader area such as the B-line bus stop, Brookvale Community Health Centre and the Northern Beaches Tafe campus
- **Action 35** - Encourage a vibrant ground plane with active frontages to be focused along the Dale Street extension and at the interface of the proposed town square
- **Action 36** - Investigate opportunities to support an enhanced night economy with after-hour uses such as restaurants and bars in the Core character sub-precinct
- **Action 45** - Investigate the opportunity to deliver a 2,000 to 2,500sqm multi-purpose community facility on the Warringah Mall site where it can be co-located with existing services and accessible via public and active transport and potentially incorporate affordable creative spaces such as wet rooms and galleries.

Notably, the revised draft Structure Plan proposes to investigate an increase to the affordable housing contribution from 5% to up to 10% (Action 24).

The revised Brookvale Structure Plan also highlights the potential future opportunity that the Warringah Mall site presents should major road infrastructure upgrades be delivered (e.g. grade separation at Pittwater Rd / Warringah Rd intersection), or in the event that evolving population and employment forecasts and further traffic modelling identify scope for additional growth in Brookvale without the need for major road upgrades. The revised Structure Plan notes that further growth beyond what is identified in the Structure Plan may be considered in the longer term for the Warringah Mall site as this highly accessible location represents the best option to accommodate more housing while minimising private vehicle use and impact on traffic congestion. However, this would need to be supported by comprehensive traffic analysis which considers the capacity of the broader road network along with detailed assessment of localised impacts to determine the necessary access points and upgrades to roads and intersections surrounding the site.

Update to recommended zoning from SP4 Enterprise to E4 General Industrial with additional permitted uses - Dale Street east

It was noted by DPE that the proposed SP4 zone on the eastern side of Dale Street permits seniors housing, and this may not provide an appropriate buffer to the adjoining industrial zoned land. The recommended zoning has been updated to retain the existing E4 General Industrial zone and include additional permitted uses for business premises, office premises, health services facility and veterinary hospital. This will minimise land use conflict and encourage less intrusive forms of employment.

Update to planning controls for the Winbourne Road Car Park to reflect its status as a public car park

The Winbourne Road Car Park is intended to continue to provide public parking and not impact on any legal arrangements for access for adjacent properties to the west which front Pittwater Road, along with the added potential to offer a space for temporary activation events during non-peak periods to support local industry and arts.

The review process has considered the suitability of the existing RE1 Public Recreation zoning of the Winbourne Road Car Park to reflect its current and future use as a car park.

The objectives of the RE1 Public Recreation zone are:

- *To enable land to be used for public open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*
- *To protect and enhance the natural environment for recreational purposes.*
- *To protect, manage and restore public land that is of ecological, scientific, cultural or aesthetic value.*
- *To prevent development that could destroy, damage or otherwise have an adverse effect on those values.*

The existing car park does not meet the objectives of the RE1 zone. An SP2 Infrastructure (Car Park) zone is considered an appropriate zone to reflect its status as a car park and rectify a zoning anomaly.

The objectives of the SP2 Infrastructure zone are:

- *To provide for infrastructure and related uses.*
- *To prevent development that is not compatible with or that may detract from the provision of infrastructure.*

The revised Structure Plan has updated the zoning of the Winbourne Road Car Park from RE1 Public Recreation to SP2 Infrastructure (Car Park).

Update to recommended zoning and classification of two drainage reserves in Industrial East

In response to a submission concerning the zoning and classification of a drainage reserve in Industrial East, a review of all drainage reserves in the industrial precinct has occurred. Two drainage reserves are zoned RE1 Public Recreation and classified as Community Land (shown on **Figure 5**).

These two drainage reserves were dedicated to Council in the original DP 6033 when the land was subdivided in 1910. Both lots are approximately 1.83 metres wide. Lot 2 originally ran between Winbourne Road and Chard Road, however the lower portion of the drainage reserve was sold to the adjacent property owner following reclassification to Operational Land, with Council retaining an easement for drainage over it if ever required in future. Neither site has drainage infrastructure in them and both sites are zoned RE1 Public Recreation and classified as Community Land.

The revised Structure Plan updates the zoning of both drainage reserves from RE1 Public Recreation to E4 General Industrial. This matches the adjoining industrial zoning and rectifies a zoning anomaly when planning controls were translated to the Standard Instrument format and all public land was assigned an RE1 Public Recreation zone. Further, it is recommended that both drainage reserves are reclassified from Community to Operational Land to reflect the restricted access arrangements. These sites are not intended for community, public or recreational use.



Figure 5 Map showing drainage reserves in Industrial East, identified by a red outline

Update to desired future character statements

The desired future character statements have been modified to reflect the feedback received during the public exhibition. This includes:

- **The Core** – the amended statement clarifies that any rezoning to allow for residential development will be contingent on securing via a Planning Agreement the delivery of public benefits. Further, the statement expresses the need for redevelopment in the northeast corner to occur first to facilitate the site’s integration with the surrounding urban structure. A description of the vision for the town square, high street and landmark commercial office building and community facility is also included.
- **Roger Street** – the amended statement refers to the existing motor vehicle sales and servicing industry, which is a key characteristic of the character sub-precinct. The statement suggests that motor vehicle uses may transition towards more mixed use formats such as the inclusion of residential uses above.
- **Pittwater Road** – the amended statement refers to vehicle showrooms and dealerships, which are a key characteristic of the character sub-precinct. The statement encourages the retention of these uses as they provide an important economic function to the broader area. Further, the statement highlights the potential for goods repair and reuse premises to locate within the creative hub and identifies that streetscape and public domain initiatives should be designed to foster creative businesses here.
- **Industrial East** – the amended statement defines creative industry and provides clear direction on the importance of retaining industrial land for industrial purposes. Guidance on ancillary uses such as entertainment and live music is provided, that is, they must be ancillary to the industrial use.

- **Industrial West** – the amended statement distinguishes high technology industries such as software designers and film production studios, as employment uses that are suited to the characteristics of the character sub-precinct. The statement provides clear direction on the importance of retaining industrial land for industrial purposes. Guidance on ancillary uses such as offices is provided, that is, they must be ancillary to the industrial use. The statement also notes that there are some sites in the character sub-precinct that are subject to existing use rights for office premises.

Update to potential future opportunity sites

It was noted by Transport for NSW (TfNSW) that the potential extension of Powells Road to Pittwater Road would significantly impact on the Brookvale bus depot operations, traffic queues at this site and other adjacent intersections along the Pittwater Road corridor. TfNSW was not supportive of the proposal. Accordingly, the revised Structure Plan has removed the Brookvale bus depot site and Powells Road extension as a potential future opportunity for further investigation.

In response to feedback, additional commentary on the Warringah Mall site has been included to address Warringah Mall's long term vision to deliver a 'living centre' which combines its existing retail offering with residential and commercial uses. Future growth beyond what is identified in the Structure Plan may be considered for the Warringah Mall site as this is the most transport accessible location on the Northern Beaches to accommodate additional development. However, this will need to be supported by traffic analysis which consider the traffic carrying capacity of the precinct based on recent local population and employment forecasts and further assessment of localised road impacts to determine local road upgrades.

Update to Actions Table

The total number of actions has reduced from 61 to 45, through the consolidation of similar themes into single actions. Further, new actions have been included in response to feedback, including:

- **Action 1** – modified to include a heat resilience rating for Green Links as part of the Urban Tree Canopy and Greening Strategy, to establish a baseline for future monitoring
- **Action 5** – modified to reflect the increase in building height to 15 storeys for the Warringah Mall site
- **Action 13** – modified to clarify that an 18 metre building height is the equivalent of 4 storeys
- **Action 14** – modified to reflect the change in zoning on the eastern side of Dale Street from Enterprise to General Industrial with additional permitted uses for business and office premises, health services facility and veterinary hospital
- **Action 19** – modified to include consideration of urban heat and flooding hazards when improving local planning controls
- **Action 24** – additional action included identifying an option for Council to work with the owner of the Warringah Mall site to deliver up to 10% affordable housing contribution levy
- **Action 32** – modified to include an alternative option for the commercial office space in the Warringah Mall site to be integrated with a community facility building in a highly accessible and visually prominent location
- **Action 34** – modified to include consideration of connections between the Warringah Mall site and key destinations in the broader area e.g. B-line bus stop, Brookvale Community Health Centre, Brookvale Tafe campus
- **Action 42** – additional action included for Council to advocate for improvements to the frequency and reliability of the B-line bus service with Transport for NSW

Other

Based on the feedback received during the public exhibition, where considered appropriate, a number of other more minor revisions have been made to the Structure Plan, which are largely administrative and reflect the key changes described earlier. For example, additional text to enhance sustainability considerations (page H, 6, 7, 11), clarification on the dwelling and job targets since the 2017 plan (page 2), reference to new supporting Council studies (page 4), a new paragraph outlining the heritage of Brookvale (page 6), updates to the Structure Plan framework map (page 12), update to the Height Approach map (page 13), update to the Character sub-precinct map (page 14), clarification on creative industries (page 31), updates to the zoning, height and FSR maps (page 35, 38, 39), inclusion of waste management and heritage as matters for consideration in the Special Area DCP (page 40), outlining the suite of technical studies required as part of the implementation phase (page 47).