

Submissions to EIS		
Issue #	Issue	Draft response
DP&E 1	The justification for contravention of the height development standard in the Warringah Local Environmental Plan 2011 has not been satisfactorily argued. Further assessment is required detailing how both the community health centre building and car park structure impacts on adjoining sensitive receivers when considering the objectives of Clause 4.3 of Warringah LEP 2011	Listed adjacent are the objectives of clause 4.3 height of buildings. As noted in the EIS, the height and design of the building is a function of the services provided. In terms of the increased height, the proposal is considered to meet the objectives of the control for height of buildings as follows: (a) The proposed building is comparable to the height and scale of many of the recent new developments along Pittwater Road and Warringah Mall opposite. The site is within an area undergoing change in the urban fabric and the proposed development will provide a land mark building for the delivery of primary health services to the Warringah Community. It is considered that the proposal is compatible with the newer developments in the surrounding area and will be consistent with future of the area. (b) The proposed building is a significant building that provides a "gateway" to Brookvale. However it's visual impacts has been minimised through a setback from Pittwater Road that provides a human scale to the public realm at the foot path level for the use of the community and commuters. The building does not overlook neighbouring properties but provides an active frontage to improve safety and amenity to the area. As noted in Section 5.4 of the EIS the are some minor overshadowing impacts however this do not prevent solar access from achieved in all neighbouring buildings. There are not considered to be any significant impacts on solar access and there is no loss of views. (c) The proposal has no impact on the scenic quality of Warringah's coastal and bush environments. (2) and 2(a) The proposal does exceed the height limit however as discussed with Council and numerous forums, the proposed increase in height does not have any significant impacts on the adjoining or neighbouring properties and is consistent with the objectives of the height controls within Warringah LEP.
	<p>4.3 Height of buildings</p> <p>(1) The objectives of this clause are as follows: (a) to ensure that buildings are compatible with the height and scale of surrounding and nearby development, (b) to minimise visual impact, disruption of views, loss of privacy and loss of solar access, (c) to minimise any adverse impact of development on the scenic quality of Warringah's coastal and bush environments, (d) to manage the visual impact of development when viewed from public places such as parks and reserves, roads and community facilities. (2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map. (2A) If the Height of Buildings Map specifies, in relation to any land shown on that map, a Reduced Level for any building on that land, any such building is not to exceed the specified Reduced Level.</p>	
DP&E 2	The EIS refers to the proposed development as being both four storeys and five storeys - ensure the discrepancy is clarified	The CHC will comprise five (5) storeys.
DP&E 3	Details of the car parking to be provided including total floor area, height level and demonstrate access to and from the community health centre for staff, clients and commuters, including after business hour access	<p>Car Park Top level is at RL29.5 with the lift core at RL 33.8</p> <p>Access Staff - Staff can access the Community Health Centre via the link bridge at level 5 of the car park or by taking the lift to the ground floor and utilising the pedestrian crossing provided. Staff will have access to the building out of hours with a swipe card. This access will only be given if the staff member requires out of hours access. Clients - Client Parking is all on Level 1 of the car park with level access available to the Community Health Centre. Clients will access the building out of ours by an intercom system connect to out of hours services occurring on site. Commuters would not generally require access to the Community Health Centre. Commuters will park on levels 2-5 of the car park and take the lift to the ground floor before utilising the pedestrian crossing and then the breezeway to the bus interchange. The Breezeway is open 24 hours a day.</p> <p>The Car Park Floor Areas are as follows (m2): Level 1 2210 Level 2 2283 Level 3 2327 Level 4 2327 Level 5 2327 Level 6 2327 Level 7 2327 Total 16128 m2</p>

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DP&E 4	As the community health centre is expected to cater for 162 staff per shift and 538 clients per day, further clarification is required of what constitutes a 'shift period', the maximum number of staff per day, any additional generation of cycle movements and how the proposed car park will meet parking needs for both the community health centre and commuters	The figure of 162 Staff "per shift" is based on the maximum number of employees utilising the building at any one time and was calculated via a survey of the services utilising the building. This would, however be a an overestimation given that all staff attending the site on a given day are unlikely to be in the building at the same time due to the nature of the services provided. The proposed parking provision will satisfactorily accommodate staff, clients and visitors to the BCHC as well as commuters. Travel demand surveys undertaken from existing facilities have been used to ascertain anticipated use for the BCHC by staff and clients. This is addressed in Section 4.1 of Appendix E of the EIS.
DP&E 5	Provide details of the footbridge connectivity with the proposed community health centre building and Warringah Mall, including after business hour access	The pedestrian footbridge will be accessible via lifts and stairs 24 hours a day, 7 days a week. Although the stairs on the eastern side of Pittwater Road are incorporated into the BCHC structure, access to BCHC will be closed off when not required and will not impact on the public access to the stairs. The primary purpose of the footbridge is to provide for safer crossing of Pittwater Road.
DP&E 6	As the proposed second egress off William Street for the development site and right hand turn from William Street to Pittwater Road is expected to generate an extra 200 vehicles per hour and an extra 2.4 second delay in the morning peak and 8.5 second delay in the afternoon peak, the impact is likely to flow on surrounding road networks, and therefore other intersections are required to be modelled to ascertain the scale of impact	Egress from site to William street is existing, with proposed modifications. Traffic modelling has been undertaken for an additional two (2) intersections and the results are contained within the Report by TTW attached at Appendix A . The additional intersection suggested by RMS cannot be modelled until February as there are no traffic counts available and these would need to be undertaken during "normal" traffic conditions - ie after school holidays etc. The modelling of the 2 intersections that have been completed suggest that the intersections would continue to operate at a comparable level of service as the existing situation.
DP&E 7	Given the additional traffic on William Street and the proximity of sensitive (residential) receivers, an amended operational noise assessment must be undertaken for both the proposed community health centre and car park	Advice received from the Acoustic Engineer, based on the number of trips and number of cars leaving the car park suggests that the increase in noise would be in the order of 0.5dB and 0.2dB respectively. Both these increases are within the Road Noise Policy's recommended 2dB (section 3.4) increase allowable in cases where the existing noise levels exceeds the noise assessment criteria for "Existing Residences affected by additional traffic on existing local roads generated by land use developments".
DP&E 8	Confirmation of whether the subject site is deemed suitable for the development in accordance with SEPP 55 and if an amended RAP is required	Attached at Appendix B is the RAP for the site which identifies that the site can be made suitable for the use in accordance with SEPP55 subject to compliance with the RAP. HI commits to undertaking the remediation accordingly.
DP&E 9	Clarification regarding whether the development would involve the disturbance of more than one tonne of soil or likely lower the watertable as either of these would require the preparation of an acid sulphate soils management plan for the site	The development will involve the disturbance of more than one tonne of soil as part of the substructure works. As identified in the Site Contamination Report prepared by Parsons Brinckerhoff at Appendix K, in view of the low risk of ASS, ".....no historic soil sampling has been undertaken to confirm the potential for ASS. It is recommended that field and confirmatory laboratory analysis for ASS is undertaken in the northern portion of the site, and beneath the building footprints during the additional soil investigations works. Subject to the findings of this analysis, an ASS management plan (ASSMP) may need to be prepared." The Environmental Management Plan (EMP) prepared by Parsons Brinckerhoff is attached at Appendix C and provides the the framework for management of ASS.

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DP&E 10	Provide a project context for the proposed Community Health Centre and its role in providing health services in the Northern Sydney Local Health District	<p>The Northern Beaches Community Health Service Project comprises the reconfiguration and consolidation of community health services in an integrated and networked hub and spoke model across the Northern Beaches Health Service or LHD through a combination of:</p> <ul style="list-style-type: none"> • Community centre-based services • Drop-in/appointment services • Home-based services • Telephone advice and counselling services • Technologically driven evidence based services. <p>Service hubs will bring together a critical mass of services, workforce, technology, and resources which serve as the base from which these services are delivered and or outreach from. Service spokes are smaller centres from which services are delivered as close to the community as possible, and which complement the role of the service hub.</p> <p>The Northern Beaches Community Health Service Project incorporating Mona Vale Community Health Centre, Dalwood Child and Family Services and Brookvale Community Health Centre will see the reconfiguration and consolidation of community health services providing a comprehensive range of services to people of all age groups.</p> <p>The following community health services will be provided at the Brookvale Community Health Centre:</p> <ul style="list-style-type: none"> •Child and Family Health Nursing - Early Childhood Health Centre •Oral Health services (Adult and Paediatric) •Child Youth Mental Health Services (hub) •Community Adult Mental Health services (hub) This includes : Northern Beaches Mental Health Service Consumer Network, Specialist Mental Health Services for Older People (SMHSOP), Beaches Early Intervention Team, Clozapine clinic, Assertive Outreach Team, Extended Hours Team, . Community Drug and Alcohol services (hub) This includes the Opioid Treatment Program(OTP) •Northern Sydney Home Nursing services •Acute /Post Acute Care (APAC) services •Rehabilitation and Aged Care (RACS) community services (spoke) •Community Chronic Disease Clinical Rehabilitation services •(CDCRS)(outreach) •Community Podiatry •Community Diabetes Outpatient service and Diabetes Education •Community Dietetics •Musculo-skeletal Physiotherapy •HIV/AIDS and Related Programs (HARP) – programs will be Responsive Users in Health (RUSH)and Sexual Health Service(outreach) •Breast Screen •Northern Beaches Health Promotion/Population Health •Multicultural Health/ STARTTS (spoke) •Health Information services <p>The Brookvale Community Health Centre will provide purpose built accommodation optimise service provision, enhance the coordination and provision of multidisciplinary health services, maximise efficiencies and provide a critical mass of health services.</p>
DP&E 11	Provide a breakdown of the site area for each lot and whether site consolidation is proposed	<p>612 PR - 1355.8 m2 620 PR - 1733 m2 624 PR - 2466 m2 Total - 5554.8 m2</p> <p>At this stage no site consolidation is proposed.</p>
DP&E 12	Required amendments to drawings and plans: - incorporate the RL levels for the upper level of the community health centre (including plant and other use) and associated car park - floor plans show acronyms of rooms - identify what these are on the plans and/or EIS - survey plan to show any easements	<p>The Architectural report including the elevations numbered CHC-BV-AS-SSD-401 - 404 inclusive and CHC BV - AR - SSD - 410 car park, nominate RL's for all upper level elements including lift over run, and ridge heights for the CHC and Carpark.</p> <p>The survey submitted with the application was "stripped back" for simplicity. A copy of the full survey is now attached at Appendix D. Acronyms have been explained in Appendix E.</p>

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TfNSW 1	<p>The NSW government has recently announced the future of bus travel on the Northern Beaches (B-Line), with a fleet of double decker buses to run at least every 10 minutes during the day from new bus stops between Mona Vale and the CBD. A total of nine (9) modern B-Line stops including at Brookvale will be provided with real-time information, seating, weather protection and improved facilities for customers. As part of the project, other bus services would operate alongside the double decker buses.</p> <p>Recommendation</p> <p>TfNSW acknowledges that the applicant has undertaken consultation during the planning of the BCHC with TfNSW and requests that the applicant continue to consult to address the interface issues related to the bus operation in particular:</p> <ul style="list-style-type: none"> • Proposed bus stand lengths; • Proposed access arrangement on Pittwater Road; • Overhead clearance of pedestrian bridge for double decker bus operation on Pittwater Road; • Functionality for shared use by drop off and loading/unloading adjacent to the car park; • Installation of Opal readers, Opal vending machines and real time passenger information; • Pedestrian safety, in particular across the BCHC access on Pittwater Road and marked crossings within the car park; • Access management of the commuter car parking spaces; and • Use of community transport services at the proposed interchange. 	<p>As indicated in Section 4 of the EIS, HI will continue to consult with TfNSW on relevant matters, including the interface issues noted and others as they arise.</p>
TfNSW 2	<p>The proposed development has the potential to impact on traffic and transport operation in the vicinity of the BCHC site and pedestrian safety adjacent to the BCHC during construction.</p> <p>Recommendation:</p> <p>Prior to the commencement of any works on the site, a Construction Traffic Management Plan (CTMP) prepared by a suitably qualified person shall be submitted to the Principal Certifying Authority (PCA). The Plan must be prepared in consultation with Warringah Council, Roads and Maritime Services and TfNSW. The CTMP should specify any potential impacts to traffic, pedestrian, cyclists and bus services within the vicinity of the proposed site from construction vehicles during construction. Any potential impacts to pedestrian access or public transport infrastructure including bus stops should also be specified in the CTMP.</p> <p>The CTMP shall include the cumulative construction impacts of all the projects adjacent to the site. The Applicant shall submit a copy of the CTMP to Warringah Council, prior to the commencement of work.</p>	<p>The EIS acknowledges the potential for construction activities to impact on traffic and to present a potential risk to pedestrians. A Preliminary Construction Management Plan (CMP) was provided as Appendix J to the EIS and included a preliminary construction traffic management plan. This will inform the preparation of the final construction traffic management plan by the Works Contractor, and would form part of the overall CMP. Preparation of the final CMP would include consultation with relevant stakeholders including the public authorities noted.</p> <p>A copy of the final CMP would be provided to Warringah Council prior to commencement of construction.</p> <p>Note: The preliminary construction traffic management plan was provided in the printed version of the EIS but inadvertently omitted from the electronic version. The plan has been provided as Appendix F to this report.</p>
TfNSW 3	<p>A 'Future Overhead Bridge Link' is shown in the Figure 6 of the Traffic Report. Limited information is provided in the Traffic Report in relation to the proposed bridge link.</p> <p>Recommendation:</p> <p>TfNSW requests that the proposed bridge link be designed in consultation with Roads and Maritime Services and TfNSW in accordance with the relevant Roads and Maritime Services standards.</p> <p>It is requested that that pedestrian access to the bridge and to the proposed car park should be available 24/7 to allow for unimpeded use by commuters. The provision of stairs on both ends of the proposed bridge should form part of the proposal to maintain pedestrian access in the event that either of the lifts are out of order.</p>	<p>As noted in Section 4 of the EIS, HI has previously consulted with TfNSW and RMS on various matters including the pedestrian bridge. As also indicated, HI will continue to consult with RMS and TfNSW with regard to this and other relevant matters.</p> <p>HI confirms that public access to the pedestrian bridge and the commuter car park will be available at all times.</p> <p>Access to the pedestrian bridge will be available via lifts and stairs (refer Section 5.5 of the EIS, page 39).</p>

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TfNSW 4	<p>Any changes to the traffic signals including the proposal for the subject intersection require consent of Roads and Maritime Services under Section 87 of the <i>Roads Act 1993</i>.</p> <p>Recommendation: TfNSW requests that the applicant seek Roads and Maritime Services approval for the proposed changes to the traffic signals for the Pittwater Road/William Street intersection.</p>	The EIS notes that consent under Section 138 of the <i>Roads Act 1993</i> would be required for the installation of the pedestrian bridge. It is acknowledged that consent will also be required in relation to any other relevant matters identified in Section 138.
TfNSW 5	<p>The proposed right turn from William Street into Pittwater Road with the signalised pedestrian crossing on Pittwater Road in place would require more green time to be allocated for William Street. As a result of this, vehicles travelling along Pittwater Road would have reduced green time. This would have the potential to increase travel time for the high volume of bus services traversing along Pittwater Road.</p> <p>Recommendation: TfNSW requests that the introduction of the proposed right turn from William Street into Pittwater Road be undertaken with the approval of Roads and Maritime Services. This needs to be undertaken at the same time as the removal of the signalised pedestrian crossing on Pittwater Road which is expected to occur with the opening of the pedestrian bridge.</p>	Noted and agreed. It is not planned to remove the pedestrian crossing prior to the implementation of the pedestrian bridge. Once the pedestrian bridge is in place, the right turn from William Street and the removal of the pedestrian crossing would occur.
TfNSW 6	<p>Any queuing from the BCHC access on Pittwater Road in the bus lane would have the potential to impact on travel time of bus services. It is likely that most of the commuter parking spaces would be fully occupied early in the morning. Vehicles looking for parking will enter the car park without the knowledge of unavailability of parking spaces. These unnecessary additional movements on the bus lane will cause disruptions to bus services.</p> <p>Recommendation: TfNSW requests that the applicant consider and implement feasible measures to prevent the potential queuing of cars from the BCHC access on Pittwater Road into the bus lane. As an example, an electronic sign could be installed at the Pittwater Road car park entrance showing the real time information in relation to number of parking spaces that are free for short term parking and commuter parking.</p>	HI acknowledges the value in providing advice to potential car park users with regard to available commuter car park spaces so as to minimise disruptions to bus services. HI will consult with TfNSW to identify suitable opportunities in this regard.

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RMS - 1	Roads and Maritime supports the introduction of the pedestrian bridge as part of the development application however, given the high demand by pedestrians and cyclists, a 2.5m width is not sufficient.	Detailed design of the pedestrian bridge will include review of likely pedestrian demand in consultation with RMS.
RMS - 2	Consideration should be given to the accessibility of the lifts during peak periods as people within the community will have to travel a considerable distance to the nearest signalised intersection (Cross St) in order to use the pedestrian facility to cross Pittwater Road.	Alternative access to the pedestrian bridge will be available via stairs which will be provided at both ends of the bridge. The width of the stairs will be based on anticipated pedestrian demand, including peak periods.
RMS - 3	Sidra Modelling should not model the intersection in isolation but should be undertaken including the intersections in the north and south of the proposed development (Pittwater/Cross Street and Old Pittwater Road/Condamine Street). It should be noted that southbound movement on Pittwater Road in the vicinity of the development is known to queue back to Cross St. The modelling shows some minor errors on the Pittwater Road north approach which should be 220m and not 240m. In addition, southbound lane 2 is a 150m in length and these changes will increase the queuing which will occur back to Cross Street and as per the above would be important considerations in the network model.	Minor impact to the intersection is noted, the level of service at the intersection has not changed from existing scenario. Additional modelling could be undertaken if required, the extent of the model will need to be determined with the RMS. Traffic volumes and counts around the site area should be undertaken following the holiday season. Traffic counts to be undertaken during the month of February. As mentioned above, an additional two (2) intersections have been modelled and the results are included in the report at Appendix A .
RMS - 4	Roads and Maritime has reviewed the submitted application and raise no objection to the State Significant Development provided the following conditions are included in the Consent: 1. The design and construction of the kerb and gutter crossing on Pittwater Road shall be in accordance Roads and Maritime requirements. Details of these requirements should be obtained from Roads and Maritime Services, Manager Developer Works, Statewide Delivery, Parramatta (telephone 8849 2138). Detailed design plans of the proposed gutter crossing are to be submitted to Roads and Maritime for approval prior to the issue of a Construction Certificate and commencement of any road works. A plan checking fee (amount to be advised) and lodgement of a performance bond may be required from the applicant prior to the release of the approved road design plans by Roads and Maritime.	Kerb realignment is not proposed as part of this proposal. The only works along the kerb are to reinstate kerb where driveways/laybacks are being closed. This will be undertaken and consultation with RMS and on that basis this condition is not required.
RMS - 5	2. A Construction Traffic Management detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council prior to the issue of a Construction Certificate.	A CTMP would be prepared in consultation with Council and implemented prior to construction. This would be based on the Preliminary CTMP provided in Appendix J to the EIS. This condition is not considered necessary.
RMS - 6	3. The swept path of the longest vehicle (to service the site) entering and exiting the subject site, as well as manoeuvrability through the site, shall be accordance with AUSTRROADS. In this regard, a plan shall be submitted to Council for approval, which shows that the proposed development complies with this requirement.	The Sweep-path plans and assessment are attached to the Traffic Report attached to the EIS. This can be made available to Council if required.
RMS - 7	4. All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping. A construction zone will not be permitted on Pittwater Road.	The requirement for construction vehicles to fully enter the site without stopping will be incorporated into the CTMP. A Construction Zone on Pittwater Road is not proposed and will also be added to the CTMP.
RMS - 8	5. A Road Occupancy Licence should be obtained from Transport Management Centre for any works that may impact on traffic flows on Pittwater Road during construction activities.	This requirement would be identified in the contract conditions for construction of the development and it would be the responsibility of the Works Contractor to assess the need for a Road Occupancy Licence and obtain it if required. However it should be noted that access to Pittwater Road will be required in order to complete works on the laybacks as well as the bus stop. This will be dealt with in consultation with RMS and TfNSW.

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RMS - 9	<p>6. Should the post development storm water discharge from the subject site into the Roads and Maritime system exceed the pre-development discharge, detailed design plans and hydraulic calculations of any charges are to be submitted to Roads and Maritime for approval, prior to the commencement of works on site</p> <p>Details should be forwarded to: Sydney Asset Management Roads and Maritime Services PO Box 973 Parramatta CBD 2124</p> <p>A plan checking fee will be payable and a performance bond may be required before Roads and Maritime approval is issued. With regard to the Civil Works requirement please contact the Roads and Maritime Project Engineer, External Works Ph: 8849 2114 or Fax: 8849 2766.</p>	this condition is not required. All stormwater will be discharged into Council's stormwater management system.
RMS - 10	<p>7. The developer is to submit design drawings and documents relating to the excavation of the site and support structures to Roads and Maritime for assessment, in accordance with Technical Direction GTD2012/001.</p> <p>The developer is to submit all documentation at least six (6) weeks prior to commencement of construction and is to meet the full cost of the assessment by Roads and Maritime.</p> <p>The report and any enquiries should be forwarded to: Project Engineer, External Works Sydney Asset Management Roads and Maritime Services PO Box 973 Parramatta CBD 2124. Telephone 8849 2114 Fax 8849 2766</p> <p>If it is necessary to excavate below the level of the base of the footings of the adjoining roadways, the person acting on the consent shall ensure that the owner/s of the roadway is/are given at least seven (7) days notice of the intention to excavate below the base of the footings. The notice is to include complete details of the work.</p>	Noted.
RMS - 11	<p>8. The developer shall be responsible for all public utility adjustment/relocation works, necessitated by the above work and as required by the various public utility authorities and/or their agents.</p>	Noted.
RMS - 12	<p>9. All vehicles are to enter and leave the site in a forward direction.</p>	Noted.
RMS - 13	<p>In addition, Roads and Maritime provides the following advisory comments for Council's consideration in the determination of the development application:</p> <ol style="list-style-type: none"> 1. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bar dimensions) should be in accordance with AS 2890.1-2004, AS2890.6-2009 and AS 2890.2 - 2002 for heavy vehicle usage. 2. Any proposed landscaping and/or fencing must not restrict sight distance to pedestrians and cyclists travelling along the footpath. 	Noted.

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EPA - 1	<p>The EPA understands that a Section A site audit statement has not been issued for the entire development site.</p> <p>Recommendation: The proponent be required to:</p> <p>(a) engage a site auditor accredited under the <i>Contaminated Land Management Act 1997</i>; and</p> <p>(b) provide a Section A site audit statement for the whole of the development site by an EPA accredited site auditor determining site suitability for the proposed land uses prior to undertaking any construction.</p>	As noted above a Remediation Action Plan has been prepared and is attached at Appendix B . A Validation Report for the remediation undertaken to date is also attached. The RAP identifies that the land will be suitable for the proposed use following implementation of the RAP and subsequent validation. It is intended that this work commence once approval is received.
EPA - 2	<p>The EPA is aware of a number of structures set for demolition that are likely to contain asbestos cement cladding.</p> <p>Recommendations: The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes'.</p> <p>The proponent should be required to consult with SafeWork NSW concerning the handling of any asbestos waste.</p>	Noted and Agreed
EPA - 3	<p>The proponent should manage waste in accordance with the waste management hierarchy established under the <i>Waste Avoidance and Resource Recovery Act 2001</i>.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. All waste generated during the project is assessed, classified and managed in accordance with the <i>Waste Classification Guidelines Part 1: Classifying Waste</i> (Department of Environment Climate Change and Water, December 2009) 2. The body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer 3. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises. 	Noted and Agreed
EPA - 4	<p>The EPA considers dust control and management to be an important air quality issue during demolition, site clearance and preparation, bulk earthworks and subsequent construction and construction-related activities.</p> <p>Recommendations: The proponent should commit to:</p> <p>(a) minimising dust emissions on the site; and</p> <p>(b) preventing dust emissions from the site.</p>	Noted and agreed
EPA - 5	<p>The Managing Urban Stormwater Soils and Construction, 4th Edition published by Landcom (the 'Blue Book') provides guidance material for achieving effective erosion and sediment control on construction sites.</p> <p>The EPA emphasises the importance of -</p> <p>(a) not commencing earthmoving or vegetation removal until appropriate erosion and sediment controls are in place, and</p> <p>(b) daily inspection of erosion and sediment controls which is fundamental to ensuring timely maintenance and repair of those controls.</p>	Noted and agreed

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EPA - 6	The EPA notes that section 5.2 to Appendix F incorrectly suggests that the NSW Industrial Noise Policy is relevant to construction phase noise and vibration impact assessment.	Noted.
EPA - 7	The EIS does not appear to explicitly address the issue of construction hours although EIS Appendix F does appear to suggest certain works might be undertaken outside the standard hours recommended in the Interim Construction Noise Guideline. However, the EPA does accept that certain emergency work may need to be undertaken urgently (other than during the standard recommended hours) in order to avoid: <ul style="list-style-type: none"> • loss of life, • damage to property, or • environmental harm. 	Construction hours would be in accordance with the recommended standard hours identified in the ICNG, with the exception of an extended period on Saturday. This is considered to be reasonable given the surrounding type of development and the site's location on a noisy main road. Indeed construction hours at the adjacent Westfield site are 7.00 am to 7.00 pm inclusive Monday to Friday and 7.00 am to 5.00 pm inclusive on Saturday. On that basis the hours of construction sought are: <ul style="list-style-type: none"> * Monday to Friday 7 am to 6 pm * Saturday 8 am to 5 pm * No work on Sundays or public holidays These would be explicitly identified in the CEMP for the development. The CEMP would also note the possibility of the need for works outside of these hours and would include the five categories of works identified in the ICNG.
EPA - 8	The EPA acknowledges that certain oversize plant and equipment may be subject to RMS travel restrictions. However, the EPA considers that all unloading of oversize plant or equipment onto the site and all loading of oversize plant or equipment for removal from the site should be undertaken during standard hours.	Noted
EPA - 9	Recommendation: The proponent be required to ensure that demolition, site preparation, bulk earthworks, and construction and construction-related activities are undertaken during the recommended standard hours as set out in Table 1 to Chapter 2 of the Interim Construction Noise Guideline, 2009.	Noted
EPA - 10	Recommendation: The proponent should be required to schedule intra-day 'respite periods' for demolition, site preparation, bulk earthworks, and construction and construction-related activities identified in the Interim Construction Noise Guideline as being particularly annoying to surrounding residents.	Noted and agreed
EPA - 11	Recommendation: The proponent be required to ensure construction vehicles (including concrete agitator trucks) involved in construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours.	Noted
EPA - 12	The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. Recommendation: The proponent should commit to undertaking a safety risk assessment of construction activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.	Noted and agreed

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EPA - 13	The EPA considers that further information is required from the proponent before it is able to determine the extent of the operational noise and vibration impacts of the proposal. Section 6.3 to Appendix F indicates that 'As detailed plant selections for the development are not available at this stage it is not possible to carry out a detailed examination of the ameliorative mitigation measures that may be required to achieve ... the noise criteria derived for the proposal'. Instead, section 6.3 suggests that noise from mechanical plant can be reduced to meet criteria by appropriate selection of noise mitigation measures, such as silencers and duct lining. The EPA considers the approach suggested in section 6.3 to be inadequate particularly given the proximity of nearby residences to the proposed plant room on the south side of the building.	As noted, at the time the assessment was done there were no plant selections made for the development. The successful contractor will be required to select plant based on performance criteria. Plant space on the 3rd floor (453.8m2) will contain an AHU which are not typically tonal. If there are chillers proposed to be located in these areas then this issue will need to be further assessed. However as suggested by the EPA, we have assumed worst case noise level of 65dB(A) – 70dB(A) SPL within the AHU plant room and the following comments to reduce emissions to complying levels are provided. Please refer to the revised report by Acoustic Logic at Appendix F
EPA - 14	The EIS should have included an indicative worst-case quantitative assessment of the likely noise impact of mechanical plant to nearby residential receivers, together with information on the noise mitigation measures required to achieve applicable worst case criteria; and	
EPA - 15	The EIS should have included an undertaking that noise emissions from mechanical plant will not be 'tonal' as defined in Chapter 4 of the NSW Industrial Noise Policy (INP).	
EPA - 16	The EPA would consider it reasonable to adopt a night-time noise limit of 40dB(A)eq (15 minute), measured at the most affected residence, applied to air handling and other mechanical plant and equipment - (a) in the absence of a worst-case quantitative assessment referred to above, and (b) subject to the plant and equipment not generating noise that exhibits tonal or other annoying characteristics likely to contribute to sleep disturbance.	A night time noise level criteria of 40dB(A)Leq has been adopted for the project, as per Table 6.4 (page 19) of the report. Correction for tonality would be assessed based on specific plant noise level data across 1/3 octave bands.

Submissions to EIS		
Issue #	Issue	Draft response
EPA - 17	<p>Recommendation:</p> <p>The proponent be required to undertake a comprehensive assessment of noise and vibration impacts associated with operation of the CHC and to identify noise mitigation and management measures, including but not limited to:</p> <p>(a) potential sleep disturbance impacts (including ground-borne noise impacts on surrounding residences and the hospital;</p> <p>(b) tonal noise emissions which may be associated with plant and equipment for which 'modifying factors' (see INP chapter 4) may need to be applied to noise monitoring data and associated noise impact assessment;</p> <p>(c) mitigating against noise and vibration (human comfort) impacts from mechanical plant;</p> <p>(d) design of loading docks and waste collection areas to -</p> <p>(i) avoid or minimise the activation of vehicle reversing alarms during use of those facilities, or</p> <p>(ii) adequate noise shielding of surrounding noise sensitive receivers, especially residences, from noise generated during activities associated with those facilities;</p> <p>(e) adequate design, selection and maintenance of noise generating mechanical services (especially air handling plant and equipment and automated valves) and associated rooms and enclosures; and</p> <p>(f) limiting the hours of operation of loading dock and waste collection activities to 'daytime' hours, being 7.00 am to 6.00 pm Monday to Saturday and 8.00 am to 6.00 pm Sundays and public holidays); and (g) negotiating with residents and the hospital the times at which fire alarms and standby emergency generators (if any) are tested</p>	<p>This assessment can only be undertaken once the equipment is selected. It should be conditioned to be undertaken prior to operation of the facility. However the following specific comments are made: a) A sleep disturbance assessment on the likely loudest noise level within the centre (doors slamming in carpark) is presented in section 6.2.3 (page 21) and recommendations regarding minimising other potential sleep disturbing noise levels associated with the carpark are presented in section 6.2.3 (page 22).</p> <p>b) The tonal noise emissions will be looked at once detailed plant selections are made. As mentioned above, AHU plant is not tonal in nature.</p> <p>c) Once plant selection has been agreed, detailed treatments can be considered and applied. Vibration isolation of plant is typically done in detailed design phase of the project once plant items and locations are known.</p> <p>d) There is only a loading bay/ parking spot on the eastern side of the internal road. No loading dock is included in the design.</p> <p>e) As per point b) above.</p> <p>f) Agreed</p> <p>g) The operators of the BCHC will be required to inform residents surrounding the development of when emergency systems will be tested.</p>
EPA - 18	<p>Recommendation:</p> <p>That consideration be given to requiring the proponent to undertake the following:</p> <p>(a) a noise compliance assessment -</p> <p>(i) during commissioning of the CHG, and</p> <p>(ii) at set periods following commencement of operation of the CHG; and</p> <p>(b) reporting the results of the compliance assessment monitoring referred to in (a) to confirm that noise levels do not exceed levels predicted in the required noise and vibration impact assessment and acceptable noise criteria identified in the NSW Industrial Noise Policy.</p>	<p>As per comment above this can be undertaken prior to the operation of the facility.</p>
EPA - 19	<p>Recommendation:</p> <p>The proponent be required to prepare a comprehensive 'waste management plan' for the CHC in accordance with the Waste Management Guidelines for Health Care Facilities (meaning the publication 'Waste Management Guidelines for Health Care Facilities' issued by NSW Health in August 1998)</p>	<p>Noted. Waste management will be undertaken in accordance with the current waste policy of the LHD that applies to all other facilities.</p>
EPA - 20	<p>Recommendation:</p> <p>The proponent be required to consult with the Environment Protection Authority in regard to any necessary amendment to the Local Health District 'radiation management licence' in respect of regulated material at the CHG and the management and handling of waste containing radioactive material.</p>	<p>Noted.</p>

Submissions to EIS		
Issue #	Issue	Draft response
EPA - 21	<p>Recommendations:</p> <p>The proponent be required to identify, evaluate and implement additional practical measures to minimise potable water use and to integrate those measures into the design of the CHC.</p> <p>The proponent be required to identify, evaluate and implement additional practical measures for the management of stormwater consistent with the principles and objectives of water sensitive urban design, including collection, treatment and re-use of stormwater for non-potable water uses on the development site and at Warringah Golf Course.</p>	NSW Health Regulations do not permit the use of non potable water in a health facility.
Sydney Water - 1	<p>Easement in favour of Sydney Water</p> <ul style="list-style-type: none"> • There is an existing Sydney Water easement is located along the northern boundary of the proposed development site. • Building within, or relocation/modification of this easement is not permitted. • Sydney Water is currently investigating if any building works could be permitted over the easement. We will continue to liaise with the proponent, Health Infrastructure in regards to this issue. 	Planning for the site has been mindful of the identified existing Sydney Water easement and the associated restrictions. HI will continue to liaise with Sydney Water on this issue.
Sydney Water - 2	<p>Water</p> <ul style="list-style-type: none"> • The drinking water main available for connection is the 150mm main on the eastern side of Pittwater Road. • Detailed drinking water requirements will be provided at the Section 73 application phase. 	Noted. HI would continue to liaise with Sydney Water with regard to the potable water connection to Sydney Water's infrastructure.
Sydney Water - 3	<ul style="list-style-type: none"> • The proposed development can be served by the existing 150mm wastewater main constructed within the property boundaries. • Where proposed works are in close proximity to a Sydney Water asset, the developer may be required to carry out additional works to facilitate there development and protect the wastewater main. Subject to the scope of development, servicing options may involve adjustment/deviation and or compliance with the Guidelines for building over/adjacent to Sydney Water assets. • Detailed wastewater requirements will be provided at the Section 73 application phase. 	Noted. HI would continue to liaise with Sydney Water with regard to the wastewater connection to Sydney Water's infrastructure.
Council -1	Recommend a greater front setback to Pittwater Road, especially the portion of the building that sits on the deeper area of the site to the north (adjoining the Ebs-ray Building and the Bus Depot)	Refer to Comments made under DPE1. This issue was discussed at length with the council planners to enable them to understand the reasoning behind the setback as proposed. These are: There is a minimum depth of building required to provide a functioning CHC, The setback allows the building form to provide an integrated awning for the Rapid Transport stop. The set back of the building to the North has been increased since the previous submissions to council. No further setbacks can be achieved while maintaining the functionality of the facility.
Council - 2	The front facade to Pittwater Road could be curved, such that a greater setback would be provided to the southern corner with William Street and the northern corner with the Ebs-ray Building. It is strongly recommended that the facade be articulated in ways to achieve a greater setback on the respective front corners to lessen the visually dominant scale of the building and its overbearing impact on the public domain.	The facade to Pittwater Road has been articulated since the previous presentation to Council, providing two distinct Architectural Characters to the eastern façade one panelised and one louvered. The height and mass of the building is comparable to many of the combined residential commercial buildings fronting Pittwater Road and is considered appropriate in this setting.

Submissions to EIS		
Issue #	Issue	Draft response
Council -3	While both ends of the building facing Pittwater Road are important, the priority is the south west corner, given that it acts as a 'Gateway' to Brookvale and will be very visible, sitting on the corner of this busy intersection. Council would like to see the south-west corner of the building softened with more rounded or curved elements introduced and through the use of innovative architecture and materials/colour/texture.	We recognise and understand the importance of the southern corner of the facility and its impact on the streetscape. The changes to the facade and its articulation have improved on the original design and HI is of the view that the design is appropriate for the location. Curved elements are problematic for the internal uses of the building and will result in loss of vital floor space critical to the functioning of the building.
Council -4	The block stairwell on the southern elevation facing William Street should be incorporated into the building rather than being attached to the front of the building; otherwise, a more innovative treatment of this structure should be investigated to improve the aesthetics of the building. Council is seeking a clean and simplified building form on the southern elevation.	Incorporation of the southern stair into the building would significantly compromise clinical space at that end of the building and would require greater floor area to avoid compromise in clinical functionality. Additional floor area and the associated cost was not available to the project or the site and the form of the stair outside of the main build form is considered appropriate for this location.
Council -5	Due to the solid treatment of the block stairwell material (on the southern elevation) and the 5 storey 'chimney' like effect, it does not present a fitting 'gateway' statement to Brookvale. A better approach will be to integrate the stairwell into the main building form presenting a more organised and less busy looking corner. The corner building signage can also work better with this 'cleaner' minimalist building aesthetics.	Please refer to comments above.
Council -6	The Pittwater Road facade integrates various functions of a bus and people interchange with the incorporation of the bus stops and the overhead pedestrian link bridge. It is currently a very 'busy' looking complex and the building aesthetics can work towards a more 'unifying' function with a less complicated facade treatment.	Further articulation of the façade was undertaken at the request of Council. It is important to view this section of the building as providing the location for the future bridge link from Westfield which will provide the unification Council are suggesting. The current design is considered appropriate.
Council -7	Need to address the placement of public litter bins for use by people using the bus interchange and the servicing of those bins, and litter management and cleanliness in the publicly accessible areas of the development.	Litter within the development site would be managed as per other health facilities including provision of a suitable number of litter bins and arrangements for the regular removal and disposal of collected litter. Management of litter outside of the site is the responsibility of Council.
Council -8	Need to address graffiti management.	A porcelain panel cladding system would be used for the building façade (refer Appendix D Design Report to the EIS). The surface characteristics of this material are not conducive to graffiti and the system also provides flexibility in allowing easy replacement of panels in the event of damage or disfiguration that cannot be addressed by other means. Removal of any graffiti that may occur on the CHC building would be undertaken as per the facilities management plan.
Council -9	Section 5.2 of the Transport and Accessibility Assessment indicates design for waste vehicles being typically MRV vehicles; however waste vehicles are typically HRV vehicles.	NSLHD uses a private contractor for waste disposal and the vehicles used are all MRV type.
Council -10	It is proposed to continue to share the access from Pittwater Road with the adjacent property at 626 Pittwater Road. Traffic movements for 626 Pittwater Road do not appear to have been considered in the development of the vehicle access. This could provide conflict with exiting vehicles from No. 626 unless some agreement is reached with the owners for the encroachment on the access to the property and management of vehicle movements between the two properties.	Consideration of access arrangements from Pittwater Road explicitly considered the issue of maintenance of access to 626 Pittwater Road (refer Appendix E Traffic and Accessibility to the EIS). It should be noted that there are actually separate (legal) accesses to 626 Pittwater Road and 624 Pittwater Road, notwithstanding they are immediately adjacent to each other and there is only a single break in the kerbing at Pittwater Road. HI will continue to liaise with the owners/occupants of 626 Pittwater Road with regard to any matters that may impinge on their access.

Submissions to EIS		
Issue #	Issue	Draft response
Council -11	It is indicated that service and delivery vehicles will access the site from Pittwater Road and exit to William Street and that parking/loading for these vehicles will occur in the parking bay adjacent to the car park. It is unclear if this area will operate for service vehicles only or if it will operate as a drop off area for clients/commuters as well.	This is a service area only. Client drop-off and pick-up occurs at the main entry drop area off William St. Please refer to the attached Plan at Appendix G .
Council -12	In section 3.6 of the SSD report, the proposed drop off area at the William Street entry appears to be located adjacent to the central island. This would mean that passengers getting out of vehicles would have other vehicles passing by. This also has the potential to delay other vehicles turning from William Street. This drop off area should be located on the kerb so that passengers are alighting to the kerb and the entry must be of sufficient width to allow other vehicles to pass a stopped vehicle.	It appears to be a misinterpretation of the plan. All areas are two way. The drop off area needs to be under cover and therefore this is the appropriate location. Refer Plan at Appendix G
Council -13	Traffic queuing at the traffic signals in William Street will extend past the William Street entry/exit to the BCHC which will cause delays to those vehicles entering or exiting the Centre. Adequate provision should be made for the two movements from the exit (left and right) to queue independently.	It is acknowledged that queueing could be an issue in this location. Measures to mitigate this will be discussed with RMS and may include a "keep clear" road marking and signage.
Council -14	The SIDRA output for the intersection of Pittwater Road/Condamine Street/William Street indicates that both of the traffic lanes from William Street will be 240m in length (Traffic and Accessibility Report - Appendix C, pages 6-9). This would require the removal of parking for that length in front of residences along William Street and is not considered acceptable.	There is no proposal for parking loss in William Street since there will be two separate lanes for vehicles turning right within the 'No Stopping' area..
Council -15	The use of Short Street for construction vehicles is to be avoided where possible.	Noted.
Council -16	Concern is expressed at the relocation of the bike parking from William St to the northern side as the location is lacking in surveillance and is not directly linked to existing cycle/shared paths. Using the new bike racks will necessitate travel through vehicle driveways/drop off zones or along the BRT Pedestrian colonnade. The applicant must demonstrate measures to improve security at bike racks and ensure appropriate accessibility for cyclists from existing bike routes.	The proposed location of bike parking is consolidated with the Car Park Bike Parking and Pedestrian Paths to and from Car Park. This location is in a more active pedestrian area, closer to the BCHC and will be under surveillance by the centre and BRT
Council -17	CCTV surveillance of commuter bike parking is recommended given apparent lack of passive surveillance. It is therefore recommended that the proposed CCTV be extended to include bike parking locations.	The location of bike parking as discussed above does have casual surveillance and additional security is not considered necessary.
Council -18	Stairs on the William Street frontage and within internal pathways will prevent cyclists from accessing the proposed bike parking, sending them through the pedestrian area for bus passengers or the internal access road. Whilst the use of the internal road by cyclists is not in itself problematic, given likely peak traffic movements, it may represent a safety issue for school age cyclists/commuters.	This interpretation is not correct. Please refer to the Plan attached at Appendix G . There is easy access for wheelchair users in the current configuration.

Submissions to EIS		
Issue #	Issue	Draft response
Council -19	The drop off area for disabled or wheel chair bound passengers is not readily accessible to the bus stops due to stairs on William Street. At least a 3m level difference along the internal access road/ramp is too steep for wheel chairs and stairs are a barrier to access on the pathway. It is recommended that drop off access for wheelchair users be reviewed.	The William Street Drop off location is intended for Clients of the BCHC rather than Commuters. There is a service Bay located at the lower level adjacent to the car park that is intended to be utilised as a drop off bay for commuters where DDA compliance is achieved
Council -20	Additional kerb ramps are required to provide access from disabled parking spaces to pedestrian launching points at pedestrian crossings (between car park and buildings and BRT). This is required to avoid vehicle conflicts at entry/exit to the car park.	Noted. An extra pedestrian ramp will be added in the location shown on the attached Plan at Appendix G .
Council -21	Adequate seating is to be provided for bus passengers. There is an apparent lack of seating available for bus passengers (3 only provided - local stops, 1 for BRT)	Seating shown on the current plans is indicative only and will be confirmed with TfNSW prior to finalisation. This is a matter for TfNSW.
Council -22	Relocation of Council advertising bus shelters needs to be addressed. Provision for information and advertising to maintain Council's revenue has not been addressed.	Relocation of bus shelters would be undertaken in consultation with TfNSW and Warringah Council. It is not anticipated that this would affect existing arrangements regarding advertising and therefore Council's revenue stream.
Council -23	Adequately designed driveway arrangements need to be made to eliminate vehicle conflicts between the entry/exit to 626 and 624.	The design of the access from Pittwater Road has considered the issue of maintenance of access for 626 Pittwater Road. As indicated in Section 5.5 of the EIS, access arrangements to 626 Pittwater Road would remain unchanged. The dual access driveway provides access to the 626 Pittwater Road for vehicles up to 12.5 metres in length. Further details are provided in Section 5 of the Transport and Accessibility Report (Appendix E to the EIS).
Council -24	How are cyclists expected to cross Pittwater Road - access to the pedestrian bridge is unclear. The pedestrian bridge appears to be inaccessible to cyclists and is unlikely to be used.	Cyclists will be able to access the pedestrian bridge using either the lifts or via a cycle ramp proposed for the stairs.
Council -25	It is recommended that relocation of Council bike racks on William Street to the western side of Pittwater Road be undertaken by the applicant providing facilities for cyclists accessing the BRT from the west side of Pittwater Road.	It is not proposed to provide bicycle parking facilities on the western side of Pittwater Road.
Council -26	The Heritage Report does not mention the Lions Club of Brookvale time capsule installed in the footpath at the bus stop. The capsule is due to be opened on 1 April 2017 to celebrate the centenary year of Lions Clubs International. Provision shall be made to locate, protect and provide access to the time capsule in consultation with Lions Club Brookvale.	Prior to construction HI would liaise with the Lions Club of Brookvale to identify an appropriate course of action to locate, protect and provide access to the time capsule. However while there will be works to the bus shelter - replacement of paving, new furniture and fixtures and an awning attached to the building extending over the waiting area, the relocation of the bus will only be temporary to facilitate these works. This temporary relocation will be done in consultation with Transport for NSW.
Council -27	Internal stormwater disposal to be connected directly to Council's drainage network rather than the kerb to ensure wet and dry weather flows do not create water spray impact on bus passengers.	Noted and agreed

Submissions to EIS		
Issue #	Issue	Draft response
Council -28	Natural Environment (flooding) has no objections to the EIS for the Brookvale Community Health Centre. The EIS has demonstrated that the proposed development complies with all the relevant flood related development controls for a mixed use industrial/commercial building in a medium risk flood planning precinct. The applicant has demonstrated that the development will have no impact on flooding for neighbouring properties in the PMF event and will still maintain the overland flow path adjacent to the site.	Noted.
Council -29	Natural Environment (stormwater) has no objections to the EIS for the Brookvale Community Health Centre. The EIS has addressed Councils requirements related to stormwater management.	Noted.
Jane Floyd 1	Cement mixing business activities result in dust and particle emissions which could affect users with respiratory issues	The Cement mixing business is an approved use and is located some distance from the CHC facility. The cement business will not have a significant impact on the use or users of the CHC.
Jane Floyd 2	Business activities would greatly affect noise amenity of CHC	Refer to comment above
Jane Floyd 3	Potential conflicts between cement trucks and vehicles accessing the CHC	Refer to comment above
Jane Floyd 4	Unless the cement mixing business can be relocated, the CHC development is not in appropriate location given the above issues	Refer to comment above
Ruth Reynolds 1	Consideration should be given to relocating the Medicare office from its current location to the CHC as this would improve access	This does not form part of the current proposal.
Danny Grkovic 1	Supports proposal	Noted
Danny Grkovic 2	Start and finish of construction	The construction program is from April 2016 to December 2017.
Danny Grkovic 3	Development will have associated traffic and noise impacts on residents	The traffic study undertaken and included in the EIS document and the additional modelling included in Appendix A anticipates the road network and intersections would continue to operate to a satisfactory level. The implementation of a pedestrian bridge will allow for vehicles exiting the BCHC to directly access Pittwater Road, rather than travelling on William Street.
Danny Grkovic 4	Height of building and number of storeys	The building is 5 storeys and the roof height is at RL 29.8m
Danny Grkovic 5	Roads around the development need to be upgraded	The traffic assessment has considered the additional traffic that would be generated by the development and concluded that the additional traffic could be accommodated in the surrounding road network. With the exception of Pittwater Road, any decision to upgrade surrounding streets would sit with Warringah Council.
Danny Grkovic 6	Bus stop shelter location	The bus shelter will remain in its current location
Danny Grkovic 7	Number of people working in the CHC	Up to 224 staff will work at the Brookvale Community Health Centre, although it is unlikely there will be this number of staff in the Centre at the one time due to the nature of services being provided (many services will be provided in the community with BCHC serving as the base of operations).

Submissions to EIS		
Issue #	Issue	Draft response
Confidential - 1	Objects to proposed right turn from William Street into Pittwater Road.	The EIS considered the effect of the introduction of the right hand turn from William Street and identified that the benefits for safety would outweigh the minor impacts on traffic flow. Traffic Impact assessments have shown there will be no change in the level of service of the intersection at William Street and Pittwater Road (following the implementation of pedestrian bridge) and may reduce the amount of traffic on William Street by providing direct access from the CHC to Pittwater Road.
Confidential - 2	Reliance on GHD report not appropriate as it does not allow for redevelopment of Warringah Mall.	GHD report section 5.2.8 discusses an additional allowance for a 30% increase in pedestrian traffic as a result of Warringah mall development.
Confidential - 3	Performance of right turn given proximity of CHC access on William St and proposed turning movements, and proximity of residence driveways	Turning can be accommodated, as shown on the swept path assessment.
Confidential - 4	Provision of the right turn will give cars the opportunity to use the entry to Warringah Mall.	Vehicles exiting William Street will only be allowed to turn right or left. Signage will be provided advising of permitted turning movements and prohibiting vehicles from travelling straight ahead into Warringah Mall.
Confidential - 5	William St is already used as a rat run which has associated traffic safety issues. The right turn will attract more traffic to William St which will further reduce safety.	Noted. This will need to be monitored by Council and local authorities.
Confidential - 6	Access to residences is already affected by vehicles parking in William St. The development will increase the number of vehicles and further affect access.	The development provides sufficient parking on site for health services staff and clients. The number of car park spaces has been based on an analysis of staff and client numbers as established through the functional requirements for the facility and a travel demand survey of staff and clients of existing facilities (refer Section 5.5 of the EIS and Appendix E Traffic and Accessibility to the EIS).
Confidential - 7	Objects to inclusion of mental health, drug and alcohol services being provided at the CHC as this will reduce safety for people in the area.	Mental Health and Drug and Alcohol services are an integral part of a Community Health service. There is no documented evidence to suggest that safety of people in the area would be at risk. Therefore this is not a valid planning consideration The Northern Sydney Local Health District (NSLHD) has a long history of providing community based mental health, drug and alcohol related services in a clinically safe and secure environment. The above services moving to the Brookvale Community Health Centre will be located in a purpose built space designed to ensure client, staff and community safety. Clinical design, scheduling of appointments and practice is such that clients do not congregate in the facility for any length of time.
Confidential - 8	Concerned that provision of a bus interchange will encourage loitering. While CCTV will discourage loitering in the area, this would just move the problem elsewhere.	The location is currently an active bus stop and interchange and the use is not being changed by the provision of building on the site. The new facility has been designed in conjunction with TfNSW planners to ensure the safety of commuters and the community.
Confidential - 9	Objects to the manner in which consultation has been undertaken with only six weeks allowed to provide comments, particularly given the length of time that planning for the development has been underway.	The EIS and supporting documents have been exhibited for the period statutorily required by the <i>Environmental Planning and Assessment Act 1979</i> . In addition to this process, the following consultation has also been undertaken: <ul style="list-style-type: none"> • Letter box drop on 29 October 2015 promoting EIS • Letter box drop promoting EIS and Community Events 16 November 2015 • Two articles in Manly Daily Manly Daily – Work on medical centre begins – 24 October 2015 and Chance for a say over Health Centre proposal – 5 November 2015 both promoting the EIS • Two advertisements by HI in Manly Daily 18 and 20 November 2015, each promoting community information sessions and EIS • Two community drop in sessions 20 and 25 November 2015 at Warringah Mall community rooms
Confidential - 10	Questions value of time savings for crossing Pittwater Road and whether these will have a material impact.	Removal of ongrade crossing and installation of pedestrian bridge is proposed to improve pedestrian safety.
Confidential - 11	The height of the building will not be in keeping with other buildings in Brookvale.	Refer to comments at DPE1 above

Submissions to EIS		
Issue #	Issue	Draft response
Confidential - 12	A seven storey car park on Pittwater Road will have a major visual impact.	The multi-storey car park will be at the rear of the site and largely screened from most viewpoints. The main exceptions will be for viewers on Pittwater Road to the north of the site and for occupants of adjoining commercial premises. The Southern elevation has a precast concrete wall and the Western facade, most visible to Pittwater Road is treated with fixed louvres to reduce the visual impact of the car park.
Jacki Tulk (Anderson) 1	Need to consider the existing safety issue of traffic not giving way when turning right from Short St/Corrie Rd into William St. The development will increase traffic on the local road network.	The intersection is beyond the scope of this project.
Jacki Tulk (Anderson) 2	Residents at the eastern end of William St are already affected by parking and traffic, resulting in William St operating as a one way street. Additional traffic on William St will aggravate this issue.	Parking demand surveys have been undertaken to determine the amount of parking that should be provided for the development. The multi storey car park will adequately address this parking demand.
Jacki Tulk (Anderson) 3	Provision of the right turn from William Street will increase traffic and could may result in congestion at the access to the CHC.	Traffic modelling has indicated that the intersection level of service will not be reduced due to the proposed improvements.
Frank Arenelli 1	Concerned that not all CHC clients would use the on site car park and that parking in William St would aggravate existing issues with access to residences.	A survey of clients at the facility indicates that 40% of will travel by public transport reducing the demand on the car park
Frank Arenelli 2	Increased traffic along an already busy road.	Traffic modelling has indicated that the intersection level of service will not be reduced due to the proposed improvements.
Frank Arenelli 3	Provision of a right turn from William Street will attract vehicles from Harbord Road.	Traffic modelling has indicated that the intersection level of service will not be reduced due to the proposed improvements.
David Hume 1	Construction workers/visitors will use local streets for parking which will greatly impact William St residents. Suggest introduction of resident parking scheme with 1 hour parking limit.	Parking for construction works will be provided on site and contractors will be encouraged to car pool when appropriate.
David Hume 2	Objects to provision of right turn from William St. Use of Mitchell Rd to travel north would be much quicker, particularly given fewer sets of traffic signals.	Noted
David Hume 3	The proposed right turn will create a rat run for vehicles wanting to access Warringah Mall and will add to traffic on William St.	Traffic modelling has indicated that the intersection level of service will not be reduced due to the proposed improvements.
David Hume 4	The distance between the William St access and the Pittwater Rd intersection appears far less than what RMS would usually allow.	The proposed development had been reviewed by RMS.
David Hume 5	The increase in traffic volumes on William St which is currently a local road, will result in an effective increase in hierarchy.	Traffic modelling has indicated that the intersection level of service will not be reduced due to the proposed improvements.
David Hume 6	Access and egress from the multi-storey car park should be restricted to Pittwater Rd.	The site currently has egress to William Street. Coordination with Local and State authorities has been undertaken to develop the best servicing strategy for the site.

Submissions to EIS		
Issue #	Issue	Draft response
David Hume 7	The development will result in the loss of an informal commuter drop off/collection area in William St that has been in use for many years.	The development will not remove all opportunities for informal drop off and pick up which can still be achieved along William Street.
David Hume 8	Drug and alcohol services will exacerbate existing social problem associated with adjacent building at 2-4 William St.	<p>The development of the site and passive surveillance will provide a safer location than the current derelict site. Drug and Alcohol services are an integral part of a Community Health service. There is no documented evidence to suggest that safety of people in the area would be at risk. Therefore this is not a valid planning consideration. 2-4 William street is not owned by NSW Health nor does it form part of this proposal.</p> <p>The Northern Sydney Local Health District (NSLHD) has a long history of providing community based drug and alcohol related services in a clinically safe and secure environment. The above services moving to the Brookvale Community Health Centre will be located in a purpose built space designed to ensure client, staff and community safety.</p> <p>Clinical design, scheduling of appointments and practice is such that clients do not congregate in the facility for any length of time.</p>
David Hume 9	Development does not address visual amenity issues associated with building at 2-4 William St	2-4 William street is not owned by NSW Health nor does it form part of this proposal.
Ann Sharp 1	The location of the development adjacent to busy roads and surrounding development, and the absence of open landscaped space is not conducive to healing and health.	<p>One of the key goals of locating the CHC at the current location was to provide ease of access for all members of the community with key criteria including:</p> <ul style="list-style-type: none"> Optimising geographical access for the majority of people in the catchment area Enabling access by public or private transport Consideration of access for the elderly; and Providing dedicated parking in close proximity to main entrances. <p>The site selected best satisfied this criteria of those available at the time of purchase. The facility does not provide overnight accommodation and therefore the focus on a landscape setting is less critical for this type of facility.</p>
Ann Sharp 2	Had consultation been undertaken prior to the exhibition of the EIS, this would have provided an earlier opportunity to comment on issues.	Yes. See comments above
Ann Sharp 3	If properties to the north and east of the site had been acquired, this would have avoided the need to exceed the height limit of 11 metres.	The current site is sufficient for the scope of the project and the increase in height is considered appropriate in the context of the buildings location.
Ann Sharp 4	The height of the building detracts from pedestrian amenity.	Refer to comments at DPE1 above
Ann Sharp 5	The building will dominate the surrounding public space and narrow the visual space around the intersection.	The building has been set back to the maximum extent possible without compromising the clinical outcomes for the site. Refer also comments above.
Ann Sharp 6	There is no space available for a shuttle/local bus service on the eastern side of the intersection which would provide a number of social benefits. The space required would be far less than that for 250 commuter car parking spaces.	This is not a part of the scope of this project.
Ann Sharp 7	There would be benefit in giving a higher priority to pedestrian amenity surrounding the development.	The current design improves pedestrian amenity by increasing the width of the Bus Interchange from 2.5m to 6m.

Submissions to EIS		
Issue #	Issue	Draft response
Ann Sharp 8	The existing space for seating and pedestrians is inadequate. Adherence to the 6.5 m setback would allow more space for pedestrian passage and seating.	As above
Ann Sharp 9	Vehicle access to the drop off area and the multi-storey car park will conflict with pedestrian use of the footpath on the northern side of William Street and create a hazard for pedestrians. Is grade separation possible?	Grade separation is not possible. Speed limits will be applicable to the access road and driveway entering William Street.
Ann Sharp 10	The lane east of the building is an enclosed space and not conducive to pedestrian use. Impacts from vehicles in surrounding streets and driveways would include air pollution, noise, safety, poor urban amenity.	The lane to the east of the building is not intended for pedestrian use. Pedestrians can enter the building from the drop off zone and access Pittwater Road or continue on William Street to access the Bus interchange.
Ann Sharp 11	Minimal landscaped open space has been provided to soften the urban landscape and provide landscaped outdoor space (away from Pittwater Road) to complement the use of the building.	Please refer comment above and the constrained nature of the site.
Ann Sharp 12	A drop off area should continue to be provided at the western end of William Street. Parking for drop-off and pick-up should be provided at all times.	Refer to comments above
Ann Sharp 13	Safe passage is required for pedestrians, preferably avoiding the need to cross vehicle exit and entry driveways.	Pedestrian crossings and speed limits are provided where necessary at points of potential conflict.
Ann Sharp 14	A Park and Ride facility in Warringah Mall would be more convenient for residents living to the west of Pittwater Road and avoid the unnecessary influx of vehicles through industrial and residential areas to the east.	Noted.