

4 December 2015

Director – Infrastructure Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Our Ref: 2015/357949

Attention: May Banh – Planning Officer - Infrastructure

Sent by email: mytien.banh@planning.nsw.gov.au

Dear Ms Banh

Submission on DA and EIS – Brookvale Community Health Centre (SSD 6980)

I refer to your letter dated 29 October 2015, which advised of the exhibition of the Development Application and accompanying Environmental Impact Statement (EIS) for the Brookvale Community Health Centre at 612, 620 and 624 Pittwater Road, Brookvale.

Council staff have undertaken a review of the documentation and Council's submission is attached for your consideration.

If there are any questions, or you need clarification on any comments, please do not hesitate to contact Janine Formica on (02) 9942 2662 or by email at janine.formica@warringah.nsw.gov.au

Yours faithfully



Peter Robinson
Acting Deputy General Manager Environment



Council Submission

Brookvale Community Health Centre State Significant Development Application (SSD 6980)



3 December 2015

Introduction

This document is Warringah Council's submission in response to the exhibition of the State Significant Development (SSD) Application and accompanying Environmental Impact Statement (EIS) for the proposed Brookvale Community Health Centre to be located at 612, 620 and 624 Pittwater Road, Brookvale. The applicant is Health Infrastructure.

The proposal is designated as State Significant Development (SSD) and therefore is subject to assessment under Part 4, Division 4.1 of the Environmental Planning and Assessment Act, 1979. As a result, the Minister for Planning is the consent authority for this SSD, not Council.

The proposed development consists of:-

- A new four (4) storey building with a gross floor area (GFA) of 5,591m² known as 'Brookvale Community Health Centre';
- The centre will provide a range of health-related services including adult mental health services, allied health services, breast screen, child and adolescent mental health services (CAMHS), child and family health (C&FH) services, chronic care, community nursing and acute post-acute care (APAC) services, community drug and alcohol services, HIV/AIDS and related programs (HARP), health information services, multicultural health service, oral health services, population health and rehabilitation and aged care service;
- A retail space (café) on the ground level;
- A multi-storey (7 level) car park, providing a total of 475 spaces. Of this, there will be 250 commuter parking spaces, 44 visitor/short term parking (1 hour limit) spaces, 10 accessible spaces, 54 fleet spaces and 117 staff spaces;
- Areas for bike cages, racks and motorcycle facilities;
- A pedestrian bridge across Pittwater Road. The bridge provides for the future installation of advertising signage (the content of any future sign will be the subject of a separate application);
- Signage on the northern and southern facades comprising 'BCHC' aligned vertically. This will be internally illuminated with LED backlights mounted inside each letter; and
- A main vehicular entrance off Pittwater Road (left in, left out only) and secondary entrance on William Street (all movements).

Council Comments on DA and EIS

1. Strategic Planning Response

The subject site is located within the Brookvale – Dee Why strategic centre, as identified within the State Government's metropolitan plan titled "*A Plan for Growing Sydney*". This plan identifies a number of priorities for the Brookvale – Dee Why strategic centre.

The location of a Community Health Centre in Brookvale is an appropriate land use given its strategic centre status. It will provide an employment hub for public health and community services while also providing some retail space at ground level and public carparking.

The proposal is also located on the main transport route of Pittwater Road, which has also been identified by the State Government for the implementation of a Bus Rapid Transit system (to be known as the B Line). This Community Health Centre will be located next to one of main stops for the future B Line and is also located directly opposite the major retail shopping centre, Warringah Mall. The application proposes a pedestrian overbridge to connect with Warringah Mall and to the B Line on the other side of Pittwater Road. The application also proposes a commuter car park to be used in conjunction with the existing and future public transport services.

All these factors mean that the Brookvale Community Health Centre is an appropriate use within the Brookvale – Dee Why strategic centre and is well located in relation to transport. It will provide enhanced pedestrian accessibility to public transport as well as providing commuter car parking and facilities for bike and motorcycle parking.

It will also mean that a site which has been vacant and an eyesore for many years will be developed, providing a safer environment for people using public transport from this spot. This site is located at the southern gateway to the Brookvale centre and this development will greatly increase the visual amenity of the area and provide a landmark building for the southern entrance to Brookvale.

Council is currently preparing a Brookvale Structure Plan which will develop a framework to guide future development of Brookvale. This project is in its initial consultation stage and no decisions have been made as to whether there is a need for any changes to the existing planning controls within the area. However, as mentioned above, it is considered that a Community Health Centre on this site is an appropriate use in this location and in the land use context in which it sits. Therefore it is considered that this proposal will be consistent with any future recommendations which may arise out of a Structure Plan for Brookvale.

2. Development Assessment Response

Council would again like to reiterate the importance and prominence of this site. This development (along with the redevelopment of the Warringah Mall site opposite) will act as a “Gateway” to Brookvale and the building therefore deserves an exceptional urban design outcome.

This advice and recommendation has been consistent throughout the prelodgement meetings and in the previous written advice provided to the applicant.

Council recommends the following changes to the design to improve the public domain, soften and simplify the building form and achieve an exceptional piece of architecture that will sit well on this extremely important and visible site for the next 50-100 years:

- 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).
- 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 façade 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.

- 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.
- 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.

3. Urban Design Response

In addition to the Development Assessment comments above, Council's Urban Designer would like to add these further comments, specifically in relation to the block stairwell on the southern elevation:

- Due to the solid treatment of the block stairwell material 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.

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.

4. Waste Management Response

The EIS needs 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.

The EIS should also address graffiti management.

Also note in 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.

5. Traffic Management Response

The following matters need to be addressed:

- 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.
- 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.

- 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.
- 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.
- 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.
- The use of Short Street for construction vehicles is to be avoided where possible.

6. Road Assets Response

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.

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.

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.

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.

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.

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)

Relocation of Council advertising bus shelters needs to be addressed. Provision for information and advertising to maintain Council's revenue has not been addressed.

Adequately designed driveway arrangements need to be made to eliminate vehicle conflicts between the entry/exit to 626 and 624.

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.

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 .

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. (Council Trim Reference: 2014/351134)

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.

7. Natural Environment Response

Flooding

Natural Environment (flooding) has no objections to the EIS for the Brookvale Community Heath 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.

Stormwater

Natural Environment (stormwater) has no objections to the EIS for the Brookvale Community Heath Centre.

The EIS has addressed Councils requirements related to stormwater management

Requirements related to stormwater management, in particular the management of stormwater flows from the developed site have been addressed as follows:

- Consideration of stormwater management requirements has been undertaken with reference to Warringah Council's On-site Stormwater Detention Technical Specification (Warringah Council, 2012). This specifies that for all developments, except single residential dwelling developments, the permissible site discharge is to be calculated on the maximum impervious fraction of 0%, that is, discharge off the development site is to be restricted to its undeveloped condition. Post-development runoff is to be determined on the post-development impervious area for the 5 year, 20 year and 100 year storm events.

- The on-site detention (OSD) systems are required to be designed to restrict runoff to the undeveloped condition (noting the latter is referred to as 'pre-development' in Council's specification).
- The assessment was undertaken using the DRAINS software which is an accepted tool for assessing urban runoff. The assessment identified that a detention tank with a capacity of 155 m3 will provide sufficient on-site storage to accommodate storms events up to and including the 100 year ARI storm event. This meets Council's requirements.

End of Submission

