

Brookvale Structure Plan Project Team
725 Pittwater Road
DEE WHY NSW 2099

RE: PUBLIC EXHIBITION OF DRAFT BROOKVALE STRUCTURE PLAN.

I refer to the Northern Beaches Council's public exhibition of the Draft Brookvale Structure Plan and make this submission on behalf of Harrison Investments Pty Ltd/Harrison Manufacturing, the owner/occupier of land comprising Lot A, DP 166808 and Lot 2 DP 600059, Nos. 75-79 Old Pittwater Road and Lot 1 DP 204107, No. 19 Cross Street, Brookvale.

This is a joint submission prepared by Thrum Architects (80 Clarence Street, Sydney) and Doug Sneddon Planning Pty Ltd and is to be read in conjunction with:

- *Urban & Architectural Design Review Report on the Draft Brookvale Structure Plan* – Thrum Architects, 17th November 2017 (copy provided in Annexure A); and
- *Village on the Brook – Integrated Mixed Use Urban Residential, Recreational and Employment Precinct* – Thrum Architects, 16th November 2017 (copy provided in Annexure B).

The following strategic planning documents have been reviewed and evaluated in the preparation of this submission:

- *Draft Brookvale Structure Plan* – Northern Beaches Council – Public exhibition document 2017; and
- *Revised Draft North District Plan – Connecting Communities* – Greater Sydney Commission, Public Exhibition document, October 2017.

The submission contains the following sections:

- Executive Summary;
- Section 1 – Subject Land/Harrison Manufacturing;
- Section 2 – Review & Evaluation – Draft Brookvale Structure Plan;
- Section 3 – Draft North District Plan;
- Section 4 – 'Village on the Brook': An urban renewal opportunity to create a high quality mixed use development and public domain adjacent to Warringah Mall; and
- Section 5 – Requested Amendment to the Draft Brookvale Structure Plan.

2/101 Excelsior St,
Lisarow NSW 2250
TEL: 02 4328 3851
FAX: 02 4328 4050
MOB: 0408 432 838

EXECUTIVE SUMMARY

Harrison Investments Pty Ltd/Harrison Manufacturing are the owner/occupier of land comprising Lot A DP 166808 and Lot 2 DP 600059, Nos. 75-79 Old Pittwater Road and Lot 1 DP 204107, No. 19 Cross Street, Brookvale.

The site has an area of 2.65 ha and Under Warringah Local Environmental Plan 2011 is zoned *IN1 General Industrial* and shares its southern boundary with land zoned *B3 Commercial Core* (Warringah Mall).

The Harrison Group has manufactured and distributed specialized greases and lubricating products from this site since 1963. The Brookvale site will not be able to accommodate all of the business's future requirements, including expansion and long term growth.

As the site is strategically located within 'Brookvale Town Centre'; abuts Warringah Mall regional shopping centre; and is the largest single landholding within the immediate vicinity of Warringah Mall, it offers significant potential for urban renewal in a manner which would achieve the strategic objectives of both the *Draft Brookvale Structure Plan* and the *Revised Draft North District Plan*, subject to appropriate amendments being made to the *Draft Brookvale Structure Plan* and Warringah Local Environmental Plan 2011, in the manner requested in this submission.

This submission:

- supports the Draft Brookvale Structure Plan's proposal to allow the addition of 'business premises' and 'office premises' as permissible uses with the consent of Council within the Brookvale Industrial Area (West);
- identifies deficiencies of Brookvale's town centre configuration and the challenges faced in providing for an increased residential population in high quality residential spaces, required to bring life to Brookvale;
- identifies the draft Structure Plan's limitations in delivering significant new green links and public spaces; and
- identifies factors which will act to restrict the rate of provision of new medium density housing (4 – 6 storeys) starts within the Brookvale Town Centre 'Mixed Use' zone and thereby result in slow progress in achieving the draft Structure Plan's residential development objectives over the 20 year planning period.

The Draft Structure Plan's intended restriction to '*not propose to allow mixed use developments in the IN1 Industrial zone that include residential or retail uses*' would, if adopted by Council, prevent achieving the strategic urban renewal opportunity afforded by Lot A DP 166808, Lot 2 DP 600059 and Lot 1 DP 204107, Nos. 75-79 Old Pittwater Road and No. 19 Cross Street, Brookvale ('Village on the Brook') as presented in section 4 of this submission.

The accompanying urban renewal report *Village on the Brook – Integrated Mixed Use Urban Residential, Recreational and Employment Precinct*, prepared by Thrum Architects presents a vision and concept masterplan for the transformation and redevelopment of the subject site in a manner which will deliver increased employment numbers (office/business premises and ancillary services); increased housing supply; and a high quality public domain/civic pedestrian spine. The following site calculations are applicable to the Concept Precinct Masterplan:

- Site Area - 2.65ha;
- Projected business/office floor space - 11,894m²;
- Projected employment numbers: > 250 jobs;
- Existing on-site Harrison Manufacturing jobs - 78 employees;
- Projected number of apartments – 507 dwellings;
- Projected total GFA – 66,000m²;
- Projected FSR – 2.48:1; and
- Projected Building Height – 10 – 17 storeys.

Council is requested to modify the Draft Brookvale Structure Plan so as to provide sufficient flexibility within the IN1 Industrial Zone for the Council to consider significant urban renewal opportunities for mixed use development (which include a residential component) on sites which satisfy the locational criteria for urban renewal investigation adopted by the Greater Sydney Commission in the Draft North District Plan.

The investigation and consideration of urban renewal opportunities could then occur via individual Planning Proposal applications lodged with Council. In the case of a future Planning Proposal application being lodged for the subject site ('Village on the Brook'):

- the existing IN1 General Industrial zone would be retained, thereby satisfying the requirement of S.117 Direction 1.1 – Business and Industrial zones, for a planning proposal to retain the areas and locations of existing business and industrial zones; and would also be consistent with the related planning principles and priorities of the Draft Brookvale Structure Plan and the Draft North District Plan to protect and manage industrial and urban services land;
- whilst retaining the existing IN1 General Industrial zone, a planning proposal in respect to the subject land would seek to amend Warringah Local Environmental Plan 2011 and pursuant to 'Clause 2.5 - Additional permitted uses for particular land', describe in Schedule 1 of LEP 2011 the additional permitted uses (mixed use comprising office and business premises; and residential apartments) permitted on the land with the consent of Council; and
- a planning proposal for the subject site would be consistent with the current proposal of the Draft Brookvale Structure Plan to amend LEP 2011 to allow the addition of business and office premises within the Brookvale Industrial Area (West), as each proposed multi storey building within the subject site would have its lower floor levels occupied by office and business premises, with only upper storeys allocated to residential apartments.

1. SUBJECT LAND/HARRISON MANUFACTURING.

1.1 Subject Land.

The subject land comprises Lot A DP 166808, Lot 2 DP 600059 and Lot 1 DP 204107, Nos. 75-79 Old Pittwater Road and No. 19 Cross Street, Brookvale, having a combined site area of approximately 2.65 ha. A Locality Plan is provided in Figure 1.

Under Warringah Local Environmental Plan 2011 the subject land is zoned *IN1 General Industrial* and shares its southern boundary with land zoned *B3 Commercial Core* (Warringah Mall).

1.2 Harrison Group (Harrison Manufacturing Company).

The Harrison Group (Harrison Manufacturing Company) has conducted a manufacturing operation on the primary part of the site (Lot A DP 166808) since 1963, specializing in the manufacture, distribution and exporting of a wide range of specialized greases and allied lubricating products.

Harrison Manufacturing Company has a clearly articulated strategy and vision for the future. This includes the intention to operate a world class facility at best practice. The Brookvale site will not be able to accommodate all of the business's future requirements, including expansion and long term growth.

With these longer term needs in mind, while a clear time frame has not yet been determined, considerable investment has already been made in a suitable site and in the planning and design for future needs. This incorporates the potential for a phased transition of various activities in the future.

As the site is strategically located within 'Brookvale Town Centre'; abuts Warringah Mall regional shopping centre; and is the largest single landholding within the immediate vicinity of Warringah Mall, it offers significant potential for urban renewal in a manner which would achieve the strategic objectives of both the *Draft Brookvale Structure Plan* and the *Revised Draft North District Plan*, subject to appropriate amendments being made to the *Draft Brookvale Structure Plan* and Warringah Local Environmental Plan 2011, in the manner requested in this submission.

2. REVIEW & EVALUATION – DRAFT BROOKVALE STRUCTURE PLAN.

This submission:

- supports the Draft Brookvale Structure Plan's proposal to allow the addition of 'business premises' and 'office premises' as permissible uses with the consent of Council within the Brookvale Industrial Area (West); and
- demonstrates that much more needs to be done to also allow higher density residential development (as part of mixed use development) to occur on identified urban renewal sites located within the Draft Brookvale Structure Plan Investigation Area and which satisfy the locational criteria for urban renewal investigation adopted by the Greater Sydney Commission in the recently released Draft North District Plan.

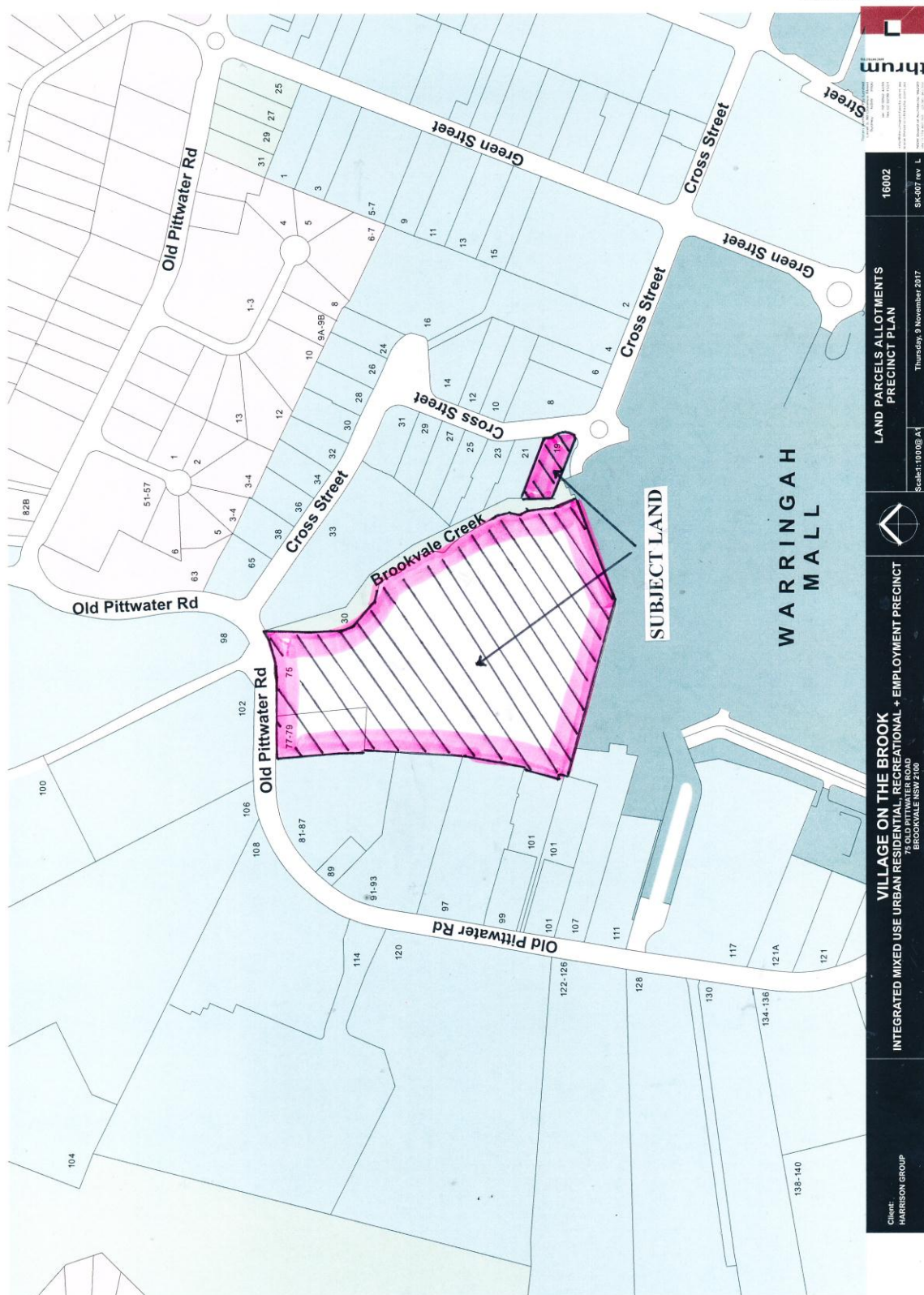


FIGURE 1: LOCALITY PLAN.

The accompanying *Urban & Architectural Design Review Report on the Draft Brookvale Structure Plan*, prepared by Thrum Architects (copy provided in Annexure A) provides a set of Draft Brookvale Structure Plan review comments for Council's further consideration when finalising the structure plan.

This review presents:

- an analysis of the 'commercial core'; 'mixed use'; and medium/high density residential zoning structure and allocations of Brookvale and comparative metropolitan strategic centres;
- identifies deficiencies of Brookvale's town centre configuration and the challenges faced in providing for an increased residential population in high quality residential spaces, required to bring life to Brookvale;
- identifies the draft Structure Plan's limitations in delivering significant new green links and public spaces;
- addresses factors which will act to restrict the rate of provision of new medium density housing starts (4 – 6 storeys) within the Brookvale Town Centre 'Mixed Use' zone and thereby result in slow progress in achieving the draft Structure Plan's residential development objectives over the 20 year planning period; and
- identifies the subject land located at 75-79 Old Pittwater Road and 19 Cross Street, Brookvale (currently occupied by Harrison Manufacturing - site area of 2.65 ha) as providing a significant urban renewal opportunity to provide for a high quality integrated mixed use precinct comprising employment, residential and recreational development, in a manner which would support the main development principles of the Draft Brookvale Structure Plan.

Whilst the Urban and Architectural Review Report should be read in its entirety to ensure a comprehensive understanding of the review analysis, the following summary is provided of the principal review comments:

- *There are some key aspects in the Draft Brookvale Structure Plan which when combined with the nature of Brookvale itself, operate to put an undesirable fetter on the ability for desired outcomes to be achieved';*
- *The principles advanced by this report, demonstrate that whilst the Draft Brookvale Strategic Plan proposes some limited steps that will create a minor level of transitioning in the right direction, it however falls short of making the wider set of changes that are necessary to achieve the outcomes needed by this town centre;*
- *At the workshop seminar conducted by Council as part of the process for preparation of its Draft Brookvale Strategic Plan, the invited speakers made comparisons of Brookvale with the other main strategic centres in the Sydney metropolitan region, and stated that one of the aims for Brookvale should be that it aspire to achieve a similar role and status for the northern beaches region;*

The following table provides a set of general comparisons of the approximate land areas that are allocated to 'commercial core' and also 'mixed uses' in a sampling of various strategic centres in the Sydney metropolitan area.

Re: Town Centre Land Areas:

TOWN CENTRE	COMMERCIAL CORE (m2)	MIXED USE ZONE (m2)	COMBINED TOTAL (m2)
BROOKVALE	170,746	83,045	253,791
DEE WHY	21,837	207,671	229,508
HORNSBY	97,356	221,308	318,664
CHARLESTOWN	222,860	192,081	414,941
CHATSWOOD	304,451	139,260	443,711
BLACKTOWN	227,732	255,133	482,865
LIVERPOOL	363,533	384,804	748,337

The table reveals that:

- *Brookvale has a very small sized 'mixed use' zone,*
- *Although its 'commercial core' is of significant size, it is noted that unlike other more typical commercial cores, it almost entirely consists of just one single corporate land holding.*
- *The very small sized Dee Why 'commercial core', is actually not a strategic centre commercial core at all, given that it merely consists of a strip of shops located at the beach at the far eastern fringe of Dee Why.*
- *The Hornsby & Charlestown strategic centres provide for a useful comparison with Brookvale. Whilst recognised as being of very similar size and of similar strategic importance to Brookvale, they have very much larger 'mixed use' zones.*
- *Both Hornsby and Charlestown centres have well over double the amount of residential land and when permissible heights are also taken into account, they have approximately 4 times the amount of residential potential, compared to Brookvale. This indicates that Brookvale is suffering a severe imbalance.*
- *The ramifications of the above observations are:*
 - *that Brookvale town centre has an abnormally glaring gross deficit in 'mixed use' land compared with other strategic centres;*
 - *that the 'commercial core' land in Brookvale is dominated almost entirely by Warringah Mall, which has a zero residential component;*
 - *that the only land provided in the Brookvale Strategic Plan for higher density residential, is confined to the limited 'mixed use' zone; and*
 - *that in view of the 'mixed use' zone being so very small in size, then in terms of Brookvale being a 'strategic centre', it means that the quantity of potential residential development in this town centre will also be abnormally small.*

- *To more thoroughly evaluate the capacity for a proposed town centre such as Brookvale, to contain adequate quantities of residential population, the ‘height’ parameter should be factored in, not just land area alone.*

The following table provides indication of how maximum heights compare in different strategic centres:

Re: Town Centre Building Heights For Residential:

TOWN CENTRE	MAXIMUM HEIGHT IN RESIDENTIAL ZONES ADJACENT TO COMMERCIAL CORES
BROOKVALE	8.5m / 15m / 21m
DEE WHY	21m/+ variations
HORNSBY	38.5m
CHARLESTOWN	43m
CHATSWOOD	34m to 172m
BLACKTOWN	20m to 72m
LIVERPOOL	35m

The Table indicates that Brookvale has the lowest maximum permissible building heights of the comparative centres.

The indications from the above generalised information are that under the current Draft Strategic Plan, the Brookvale town centre will only have a relatively small residential population in comparison to other strategic centres.

- *Comparative plans show how the overall patterns of land use/zoning in the Brookvale town centre differs markedly from the land use and zoning pattern of each of the other sampled centres.*

Each of the other sampled town centres share a similar land use and zoning pattern, typically displaying:

- *a ‘commercial core’ that is generally central;*
- *a band of ‘mixed use’ of varying width in a ring (or broken ring) configuration around that central core;*
- *outside the band of mixed use, adjacent zones of medium and high density residential; and*
- *surrounding low density residential areas.*

The reason this pattern generally repeats in these town centres, is that it reflects good urban design fostering a healthy social structure.

- *Brookvale's town centre configuration pattern deviates radically from the above stated norm, in that it has:*
 - *a small centrally located mixed use zone;*
 - *with industrial and commercial uses immediately abutting the mixed use zone, extending large distances;*
 - *then beyond that at mostly an unusually long distance away, a low density residential area. There are some pockets of intervening medium density residential to the north; and*
 - *a 'commercial core' usage located relatively remotely to the south.*
- *The most undesirable and adverse aspects of the divergent nature of the current Brookvale town centre, are:*
 - *the high level of geographic isolation / disconnection, that the new central mixed use zone will have from other residential areas;*
 - *it is creating an isolated pocket of new residential development within a central location that has a very poor level of connectivity to other residential areas;*
 - *the normal and healthy social / geographic continuum that exists in typical town centres, will not exist for residents in this new mixed use area; and*
 - *without having residential pockets within adjacent and easy walking distance to other residential sectors, a sense of social isolation of residents in that isolated core, can develop.*

Accordingly, Brookvale town centre has a fundamental social imperative for components of residential development to be distributed more widely throughout the whole town centre, in a manner that does not compete with employment generating uses.

- *The Structure Plan states (paragraph 2 on page 6), that:*

"Strategic Centres are areas of intense mixed economic and social activity".

The limited and confined component of residential development proposed by the structure plan is far short of the minimum needed to transform Brookvale into an area of "intense social activity".

- *The current proposal by the Draft Brookvale Structure Plan to allocate a 'mixed use' zone of markedly less size than normal for a town centre residential component, will be inadequate, and will not achieve the stated objective of "bringing life" to Brookvale.*

The Structure Plan needs to go much further if it is to achieve the transformation of Brookvale into a 'strategic centre'. It must make "housing" one of the priorities across the town centre.

- *The Draft Brookvale Structure Plan states (per paragraph 8, page 2) that there are “four 4 main development principles which support the Structure Plan”, one of which is to:*

“Create green links and green destinations”.

However by any measure, the Draft Structure Plan fails to achieve the creation of any new green links or green destinations of the type needed in a modern urban strategic centre.

Compounding this poor situation is the proposal by the Draft Plan to increase residential densities in the centre of a hard urban environment, without any addition of new green open space land.

The need for new green open space to be provided in the Brookvale town centre is vital.

Available to alleviate this problem, is a very large (precinct sized) parcel of underdeveloped land existing in a central location just to the west of the proposed ‘mixed use’ sector at 75 Old Pittwater Road. (Refer to the accompanying urban renewal proposal report for more information on this land and its unique potential).

A key part of the urban renewal proposal for that parcel of land, is its plan to create a new public open space parkland located centrally and immediately adjacent to Warringah Mall.

- *In the proposed ‘new ‘Mixed use’ sector, the Draft Structure Plan proposes mixed use buildings of 4 – 6 storeys.*

These mixed use building would typically contain commercial uses on their ground or lower levels, and residential apartments in their upper stories. There would also be basement carpark levels.

The mix of differing BCA building classifications within ‘mixed use zones, make them more expensive to develop per sq/m than other types of developments with a single use classification.

The existing small lot sizes typical of the proposed ‘mixed use’ zone of Brookvale Town Centre act as an impediment to re-development:

- *Two or more individual lots would need to be purchased and amalgamated in order create a viable site; and*
- *The existing pattern of development on these existing lots is such that generally on average every second lot already has a building upon it of substantial size and value.*

These factors combine to make it probable that any development of new residential buildings in this particular sector of town will be a slow and gradual process.

Other factors that will make re-development within the proposed mixed use sector difficult are:

- *The street pattern is aligned north/south, and the long axis of each individual allotment is aligned east west;*
- *This alignment pattern imposes restrictions on the design of buildings, having regard to design code requirements of the Council and the NSW Government, including:*
- *spatial measures necessary to prevent overshadowing of adjacent properties;*
- *spatial measures necessary to achieve the required amount direct solar access into apartments within each mixed use residential development itself; and*
- *Boundary setbacks.*

These Code compliance requirements, when combined with the fact of most small lots have their long axis east /west means that the need to acquire multiple lots to create a viable development site

The outcome is that this small 'mixed use' sector in this particular part of the town centre, is only going to deliver a slow and gradual transition toward having some residential.

- *Therefore, achievement of the stated aims of the Structure Plan to “bringing of life ... into Brookvale”; and having a Strategic Centre withintense mixed economic and social activity”; will unfortunately, on the basis of the current draft Structure Plan, will be severely limited and occur only very slowly.*

However, Brookvale needs invigoration of employment and social activation to occur quickly.

Available to assist the alleviation of this problem, is a very large (precinct sized) parcel of underdeveloped land that exists in a central location just to the west of the proposed 'mixed use' sector at 75 Old Pittwater Road. (Refer to the accompanying urban renewal report for more information on this land and its unique potential for employment and social activation of the Brookvale town centre).

- *For the set of urban design reasons set out herein, as being necessary for the creation of a vibrant and sustainable strategic town centre, the set of measures contained in the Draft Brookvale Structure Plan need to be bolder and go further, if it is to be the driver to allow Brookvale to achieve maximised employment and optimum liveability.*

The new 'B-Line' public rapid transport service being introduced to Brookvale, being one of the main ingredients needed for large town centres and contributes to the warranted elevation in status of the Brookvale town centre to qualify it to becoming a true 'strategic centre'.

The content of this report identifies what is needed in order for the stated objectives for Brookvale to be met, being to allow it to become a genuine “Strategic Centre with intense mixed economic and social activity” as well as creating conditions that are “the catalyst for bringing of life and jobs into Brookvale”.

3. DRAFT NORTH DISTRICT PLAN.

3.1 Brookvale-Dee Why Strategic Centre: Targets and Applicable Planning Priority Statements.

The Draft North District Plan, prepared by the Greater Sydney Commission (on public exhibition until 15 December 2017), identifies Brookvale-Dee Why as a strategic centre

It is a 20 year plan to manage growth at a district level and is a bridge between regional and local planning. In undertaking strategic planning processes and/or preparing or considering planning proposals, planning authorities must give effect to the draft District Plan, specifically the Planning Priorities and Actions.

The Draft North District Plan contains the following targets for Brookvale-Dee Why:

- Centre job target for Brookvale-Dee Why – 2016 (20,000 jobs) increasing to 23,000 – 26,000 jobs in 2036; and
- 5 year Housing targets for Northern Beaches LGA 2016 - 2021 is 3,400 dwellings.

“The North District has a high proportion of knowledge and professional services jobs, compared to the Greater Sydney average. These fast growing employment sectors are the biggest contributors to economic growth in the District”.

“The North District has the least amount of industrial and urban services land in Greater Sydney. The transition from traditional industrial to advanced manufacturing and innovative industries will further boost productivity. It is critical to maintain this land and provide important services and jobs for the District.....For the North District improving productivity can be achieved byprotecting and managing industrial and urban services land”.

The Draft North District Plan contains the following Planning Priority Statements which have particular relevance to the Council’s further consideration of the Draft Brookvale Structure Plan:

- **“Planning Priority N5: Provide housing supply, choice and affordability, with access to jobs and services”.**
- *Housing is more than just dwellings and needs to be considered across the housing continuum and with a place based approach that is designed to support communities and create great places.*

- *New housing must be in the right places to meet locational demand.... Must be coordinated with local infrastructure to create livable, walkable and cycle friendly neighbourhoods with shops, services and public transport.*
- *Opportunities for capacity can be realised by urban renewal, local infill developments and land release areas..... The Commission proposes locational criteria for urban renewal investigation opportunities to include:*
 - *Alignment with investment in regional and district infrastructure;*
 - *Accessibility to jobs;*
 - *Accessibility to regional transport;*
 - *Within walking distances of centres;*
 - *The feasibility of development;*
- *Support the role of Centres.*
- **“Planning Priority N6: Creating and renewing great places and local centres and respecting the District’s Heritage”.**
 - *Places best achieve these outcomes when they exhibit human scale and provide fine grain urban form and land use mix at the heart of neighbourhoods. Accessibility for people of all ages and abilities is central to creating and renewing great places, particularly walking and cycling connections to and within local places.*
 - *To deliver high quality, community specific and place based outcomes, planning for the District should integrate site-specific planning proposals with precinct-wide place and public domain outcomes through place based planning.*
- **“Planning Priority N10: Growing investment, business opportunities and jobs in strategic centres”.**
 - *Brookvale-Dee Why is identified as a strategic centre;*
 - *North District will need to accommodate more than 800,000 square metres of additional retail space over the next 20 years. In addition, there will be significant demand for additional office floor space....This requires growth in either existing or new centres.*
 - *Delivering housing within a walkable distance of strategic centres encourages non-vehicle trips, which also fosters healthier communities.*
 - *The strategic centre which combines Brookvale and Dee Why provides the greatest number of jobs in the Northern Beaches. Brookvale industrial area supports niche manufacturing and wholesale industries. Warringah Mall is one of the largest retail areas in Greater Sydney. Growth of the combined centre including greater connectivity will attract employment, retail and local services, strengthening the existing centre.*

- *Strengthen Brookvale-Dee Why through approaches that:*

Maintain the mix of uses so that Brookvale-Dee Why continues to perform strongly;

Encourage and support improvements to Warringah Mall and better integrate it with the fabric and life of Brookvale-Dee Why;

Recognise and enhance the economic and employment opportunities along Pittwater Road and encourage revitalisation along the commercial strip;

Promote walking, cycling and public transport to Warringah Mall, the Brookvale industrial area and Dee Why;

Encourage the establishment of new, innovative and creative industries in the Brookvale industrial area;

Encourage new lifestyle and entertainment uses to activate local streets in Brookvale-Dee Why; and

Improve connections between Brookvale-Dee Why and the Northern Beaches Hospital at Frenches Forest.

- **“Planning Priority N11: Protecting and managing industrial and urban services land”.**

- *In the North District, given the limited supply of industrial and urban services land and the inability to increase supply, industrial and urban services land needs to be protected and efficiently managed;*
- *The North District has the lowest amount of industrial land in Greater Sydney and the highest proportion of the land used for urban services;*
- *Brookvale is shown to have 86ha of developed industrial land and no undeveloped land;*
- *Therefore, existing industrial and urban services land needs to be protected from conversion to residential and mixed use development and must be managed to accommodate businesses supporting the local economy and serving the local population.*

- **“Planning Priority N12: Delivering integrated land use and transport planning and a 30-minute city”.**

- *The District’s strategic and local centres provide a range of local jobs and services that support the growing population. Encouraging the growth of strategic and local centres will reduce the need for people to travel long distances to access jobs and local services;*

- *Northern Beaches B-Line is a committed transit initiative;*
- *Walking is a fundamental part of the transport system and most journeys start and end with walking. Creating pleasant and safe environments for walking and cycling contribute to great places where people and businesses choose to locate and invest in.*
- **“Planning Priority N20: Delivering high quality open space”.**
 - *People in urban neighbourhoods should be able to walk to local open space. In high density neighbourhoods, public open space is used like a shared backyard, providing green communal living space... ..High density neighbourhoods need to have high quality open space within close proximity.*
 - *In local and strategic centres, local open space is important to provide places for workers to relax and for people to meet and socialize;*
 - *For residents of high density, improving access to local open space together with its quality will be essential. Access to open space for residents*

3.2 Implications for Council’s preparation of the Draft Brookvale Structure Plan.

The Draft North District Plan has primacy over Council strategic plans and is required to be taken into consideration by Council’s when preparing district plans, such as in this case, the Draft Brookvale Structure Plan.

In relation to achieving job targets, both the Draft North District Plan and the Draft Brookvale Structure Plan seek to protect and manage industrial and urban services land; and growing the existing Brookvale Centre.

However, in relation to achieving housing targets, as indicated in the evaluation of Thrum Architects provided in section 2 of this submission, it is doubtful that the Draft Brookvale Structure Plan would be able to achieve a significant contribution to housing targets within the 20 year planning period.

The restrictive approach to delivering housing supply adopted by the Draft Brookvale Structure Plan, contrasts markedly to the planning priorities of the Draft North District Plan, which strongly advocates delivering housing targets by pursuing urban renewal opportunities which support the role of centres:

- *Opportunities for capacity can be realised by urban renewal, local infill developments and land release areas..... The Commission proposes locational criteria for urban renewal investigation opportunities to include:*
 - *Alignment with investment in regional and district infrastructure;*
 - *Accessibility to jobs;*
 - *Accessibility to regional transport;*
 - *Within walking distances of centres;*
 - *The feasibility of development;*

- *Support the role of Centres;*
- *Delivering housing within a walkable distance of strategic centres encourages non-vehicle trips, which also fosters healthier communities*
- *To deliver high quality, community specific and place based outcomes, planning for the District should integrate site-specific planning proposals with precinct-wide place and public domain outcomes through place based planning.*
- *Encourage and support improvements to Warringah Mall and better integrate it with the fabric and life of Brookvale-Dee Why.*

Consequently, it would be appropriate for the Draft Brookvale Structure Plan to be amended to provide sufficient flexibility to accommodate the consideration of urban renewal investigation opportunities that satisfy the locational criteria adopted by the Greater Sydney Commission in the Draft North District Plan.

Such an opportunity is presented at 75-79 Old Pittwater Road and 19 Cross Street, Brookvale (currently occupied by Harrison Manufacturing - site area of 2.65 ha), which providing a significant urban renewal opportunity to provide for a high quality integrated mixed use precinct ('Village on the Brook') comprising employment, residential and recreational development, further details of which are provided in the following section of this submission.

4. 'VILLAGE ON THE BROOK': AN URBAN RENEWAL OPPORTUNITY TO CREATE A HIGH QUALITY MIXED USE DEVELOPMENT AND PUBLIC DOMAIN ADJACENT TO WARRINGAH MALL.

The subject site, owned by the Harrison Group, presents a strategic urban renewal opportunity to:

- Achieve the housing and employment targets of the Draft North District Plan in a manner consistent with its 'Planning Priorities' to:
 - provide housing supply, choice and affordability, with access to jobs and services;
 - create and renew great places and local centres and respecting the District's Heritage;
 - grow investment, business opportunities and jobs in strategic centres;
 - protect and manage industrial and urban services land; and
 - deliver integrated land use and transport planning and a 30-minute city; and deliver high quality open space; and
- Support the four main development principles of the Draft Brookvale Structure Plan.

The accompanying urban renewal report *Village on the Brook – Integrated Mixed Use Urban Residential, Recreational and Employment Precinct*, prepared by Thrum Architects (copy provided in Annexure B) presents a vision and concept masterplan for the transformation and redevelopment of this site in a manner which will deliver increased employment numbers

(office/business premises and ancillary services); increased housing supply; and a high quality public domain/civic pedestrian spine.

Whilst the urban renewal report should be read in its entirety to ensure a comprehensive understanding of the subject land's urban context and opportunity; urban design aims, principles and benefits; and the Concept Precinct Masterplan, the following summary is provided of its principal elements.

4.1 Concept Precinct Masterplan.

The Concept Precinct Masterplan is presented in the following figures:

- Figure 2: Locality Aerial Usages Plan (Drawing SK-004); and
- Figure 3: Concept Precinct Masterplan (Drawing SK-001).

Other figures included in the urban renewal report include:

- Drawing SK-002: Access/Usage/Ownership – Organizational Schematic Layout;
- Drawing SK-003: Schematic Employment Generation Areas Plan;
- Drawing SK-005: Building Heights and Residential Yields Diagram; and
- Drawing SK-006: Sections.

The master plan, divides the site into three broad sectors of usage category:

- Public Ownership / Public Parkland sector (A combination of existing and donated land);
- Civil & Commercial sector. (Public access provided to community titled land) and
- Private Residential sector. (resident access only to strata & sub community titled land).

4.2 Site Calculations.

The following site calculations are applicable to the Concept Precinct Masterplan:

- Site Area - 2.65ha;
- Projected business/office floor space - 11,894m²;
- Projected employment numbers: > 250 jobs;
- Existing on-site Harrison Manufacturing jobs - 78 employees;
- Projected number of apartments – 507 dwellings;
- Projected total GFA – 66,000m²;
- Projected FSR – 2.48:1; and
- Projected Building Height – 10 – 17 storeys.

4.3 Urban Context and Opportunity.

The vision for this key site and its neighbourhood is to create a high quality mix of urban uses that together provide a living and breathing neighbourhood that integrates commercial employment, residential and large scale recreational uses in a sustainable and socially responsible manner.

Having a land area of 26,560m² and being located within the heart of the commercial centre of Brookvale, makes this site highly unusual for its context. The fact that the site is located immediately abutting one of the largest regional shopping centres in Australia, and the largest on the north shore of Sydney (Warringah Mall), places this site in the category of being extraordinarily rare in urban terms.

The combination of these factors, together with the fact that this immense parcel of land is all under ownership by just one party, offers a once in a generation opportunity for this area of Brookvale's town centre to be transformed.

The subject site is located centrally, being on the immediate north-west side of the Large Warringah Mall complex, and is positioned at the hub of the extensive ring of existing large scale mixed commercial developments located around it.

The site is also ideal in that it has the benefit of two street frontages located at its diagonally opposite extremities. This gives the site direct contact with two different precincts in the town centre that are presently separated from each other.

4.4 Master Planning.

The Concept Precinct Masterplan responds to the following site constraints and opportunities:

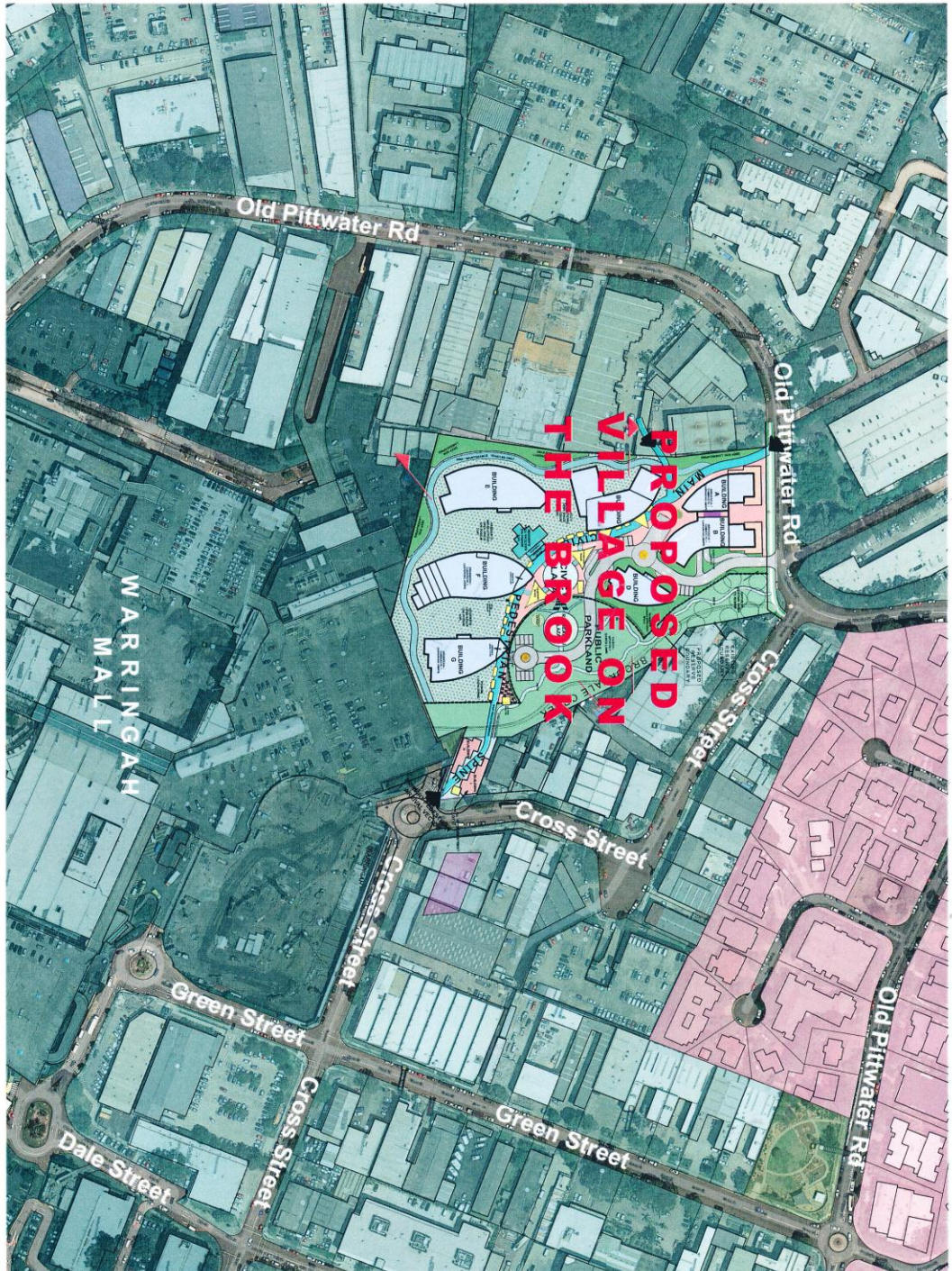
- The long ribbon of Brookvale Creek located along the full length of its eastern boundary;
- The blank wall presence of the Warringah Mall building envelope located at zero setback from the site's southern boundary;
- The blank walls from 2 and 3 storey high commercial buildings located on neighbouring land along the site's western boundary;
- The wide main frontage to Old Pittwater Rd along the north boundary;
- The significant stand of mature trees located at the north east corner of the subject site adjacent to Brookvale Creek; and
- The most visually open and attractive edges of the site, located on its north and north east sides, in the same direction as the best solar source.

Client:
HARRISON GROUP

VILLAGE ON THE BROOK
INTEGRATED MIXED USE URBAN RESIDENTIAL, RECREATIONAL + EMPLOYMENT PRECINCT
75 OLD PITTWATER ROAD
BROOKVALE NSW 2100

AERIAL USAGES PLAN
Scale: 1:1000 @ A1
Thursday, 16 November 2017

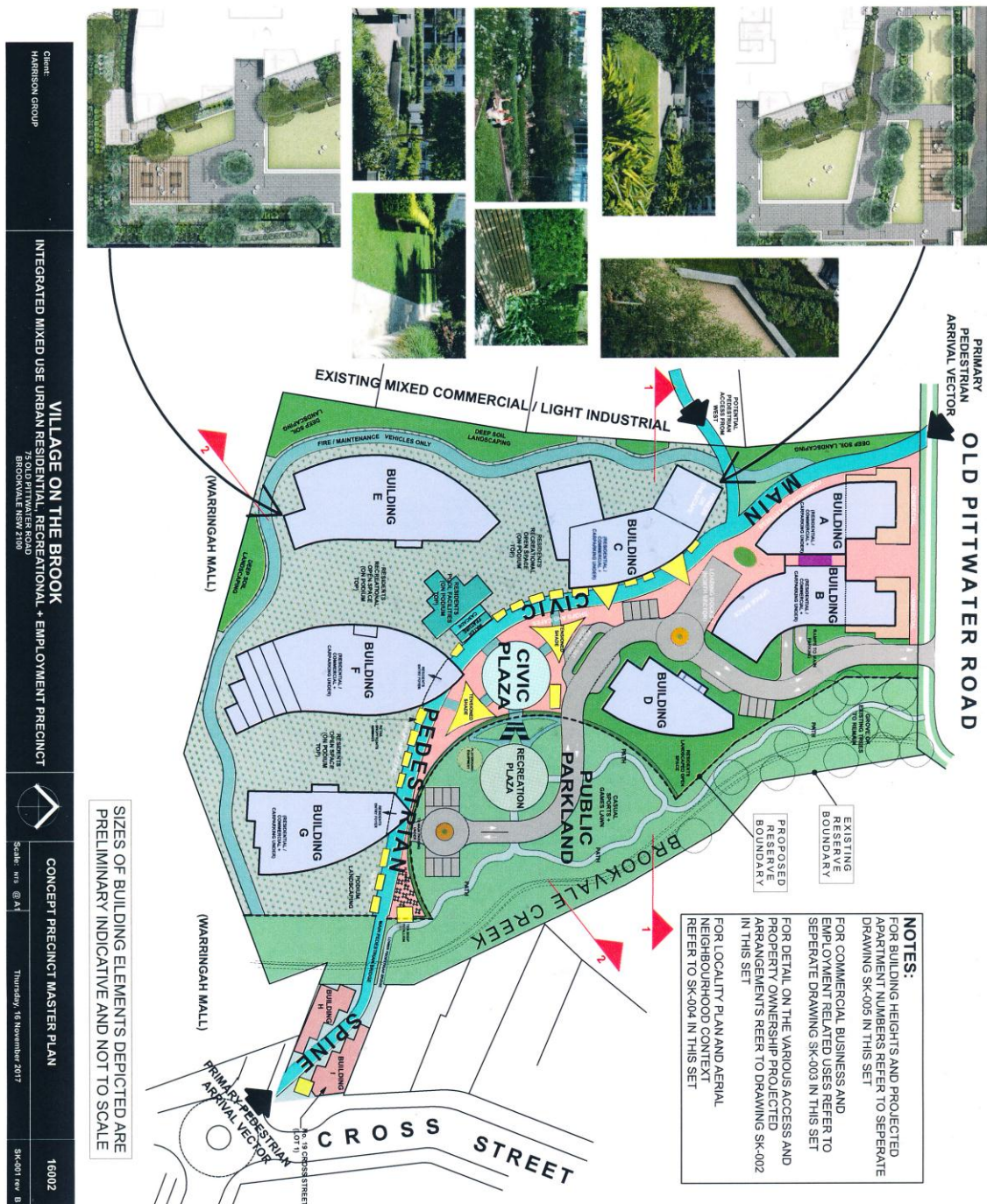
16002
BK-004 rev B



VILLAGE ON THE BROOK

INTEGRATED MIXED USE URBAN RESIDENTIAL, RECREATIONAL + EMPLOYMENT PRECINCT

FIGURE 2: Locality Aerial Usages Plan.



VILLAGE ON THE BROOK

INTEGRATED MIXED USE URBAN RESIDENTIAL, RECREATIONAL + EMPLOYMENT PRECINCT

FIGURE 3: Concept Precinct Masterplan.

In responding to these site constraints and opportunities, the concept masterplan:

- Orients recreational uses and aspect and view vectors from commercial and civic spaces toward the north & east sides of the site;
- Turns proposed public enjoyment spaces away from the imposing blank walls of adjacent development located along the south & west sides of the site by placing a broad 2 storey high podium (containing car parking / services / plant and other non-sensitive uses) along these two less aesthetic edges;
- Places the private residential sector on top of that broad podium together with high quality landscaped and vegetated improvements across the podium, and with localised pockets of deep soil zones with large trees placed strategically against the south & west walled edges of the site;
- Diminishes the bulkiness of the adjacent building envelopes along the S & W boundaries to a benign one storey scale from the perspective of the residential apartments located in the upper levels of buildings placed on the top of this upper podium level. The adjacent buildings are also softened and obscured by proposed deep soil trees and podium trees;
- Creates a 'civic plaza' as a main central social interaction place;
- Places new Public Parkland centrally along the east side of site;
- Designs the 'Main Civic Pedestrian Spine' pathway route through the site, so that it encourages maximum usage and delivers a variety of public domain experiences;
- Designs the route of the meandering slow speed access roadway within the site, so that it both adds in a controlled way to the activation and presence of motion in the public areas, and also contributes to the level of night-time surveillance of these precincts;
- Designs a change of scale at the threshold / entry location at the Cross Street end of the Main Pedestrian Spine, with gentle inclines and a second bridge providing direct & convenient access to the new Parkland; and
- Provides ability for potential other pedestrian linkages to be received from the west.

5. REQUESTED AMENDMENT TO THE DRAFT BROOKVALE STRUCTURE PLAN.

This submission:

- supports the Draft Brookvale Structure Plan's proposal to allow the addition of 'business premises' and 'office premises' within the Brookvale Industrial Area (West);
- identifies deficiencies of Brookvale's town centre configuration and the challenges faced in providing for an increased residential population in high quality residential spaces, required to bring life to Brookvale;
- identifies the draft Structure Plan's limitations in delivering significant new green links and public spaces; and
- identifies factors which will act to restrict the rate of provision of new medium density housing (4 – 6 storeys) starts within the Brookvale Town Centre 'Mixed Use' zone and thereby result in slow progress in achieving the draft Structure Plan's residential development objectives over the 20 year planning period.

The Draft Structure Plan's intended restriction to *'not propose to allow mixed use developments in the IN1 Industrial zone that include residential or retail uses'* would, if adopted by Council, prevent achieving the strategic urban renewal opportunity afforded by Lot A DP 166808, Lot 2 DP 600059 and Lot 1 DP 204107, Nos. 75-79 Old Pittwater Road and No. 19 Cross Street, Brookvale ('Village on the Brook') as detailed in section 4 above.

Redevelopment of this site in a manner, which will deliver increased employment numbers (> 250 jobs in office/business premises and ancillary services); increased housing supply (507 apartments); and a high quality public domain/civic pedestrian spine, would be consistent with Draft North District Plan *'Planning Priority N5 – Provide housing supply, choice and affordability, with access to jobs and services'*, which encourages opportunities for housing capacity to be realised by urban renewal developments which satisfy the following locational criteria for urban renewal investigation:

- *Alignment with investment in regional and district infrastructure;*
- *Accessibility to jobs;*
- *Accessibility to regional transport;*
- *Within walking distances of centres; and*
- *The feasibility of development;*

Council is requested to modify the Draft Brookvale Structure Plan so as to provide sufficient flexibility within the IN1 Industrial Zone for the Council to consider significant urban renewal opportunities for mixed use development (which include a residential component) on sites which satisfy the locational criteria for urban renewal investigation adopted by the Greater Sydney Commission in the Draft North District Plan.

The investigation and consideration of urban renewal opportunities could then occur via individual Planning Proposal applications lodged with Council. In the case of a future Planning Proposal application being lodged for the subject site ('Village on the Brook'):

- the existing IN1 General Industrial zone would be retained, thereby satisfying the requirement of S.117 Direction 1.1 – Business and Industrial zones, for a planning proposal to retain the areas and locations of existing business and industrial zones; and would also be consistent with the related planning principles and priorities of the Draft Brookvale Structure Plan and the Draft North District Plan to protect and manage industrial and urban services land;
- whilst retaining the existing IN1 General Industrial zone, a planning proposal in respect to the subject land would seek to amend Warringah Local Environmental Plan 2011 and pursuant to 'Clause 2.5 - Additional permitted uses for particular land', describe in Schedule 1 of LEP 2011 the additional permitted uses (mixed use comprising office and business premises; and residential apartments) permitted on the land with the consent of Council. The description of permitted development in the Schedule could also specify the maximum floor space ratio and building height development standards applicable to urban renewal development on the site; and
- a planning proposal for the subject site would be consistent with the current proposal of the Draft Brookvale Structure Plan to amend LEP 2011 to allow the addition of business and office premises within the Brookvale Industrial Area (West), as each proposed multi storey building within the subject site would have lower floor levels occupied by office and business premises, with only upper storeys allocated to residential apartments.

Yours Sincerely

Doug Sneddon
20th November 2017.

ANNEXURE A: *Urban & Architectural Design Review Report on the Draft Brookvale Structure Plan* – (Thrum Architects, 17th November 2017).

(Under Separate Cover)

ANNEXURE B: *Village on the Brook – Integrated Mixed Use Urban Residential, Recreational and Employment Precinct* – (Thrum Architects, 16th November 2017).

(Under Separate Cover)