

Mr Ray Brownlee  
Chief Executive Officer  
Northern Beaches Council  
Dee Why Civic Centre  
Dee Why NSW 2099

18 January 2023

Dear Mr Brownlee

**Re: Revised Draft Brookvale Structure Plan**

Thank you for the opportunity to comment on the revised Draft Brookvale Structure Plan (BSP). As a general matter for consideration, Northern Sydney Local Health District (NSLHD) Health Promotion advocates for planning processes that promote health and wellbeing. To this end, NSLHD Health Promotion recommends the NSW Health *Healthy Built Environment Checklist* to inform development policies, plans and proposals such as the BSP<sup>1</sup>. It is appreciated that as a Structure Plan, this document provides a strategic planning framework for Brookvale over the next 20 years and therefore the comments herein will be relevant to this plan and the detailed planning documents that ensue.

**GENERAL COMMENTS**

NSLHD Population Health Promotion supports Northern Beaches Council's aspiration to increase housing diversity and affordability, while protecting employment lands. As such the proposal is to increase employment by 975 jobs and the number of homes by 1,300 over the next 15 years. Increasing housing in Brookvale will not only enable more Northern Beaches residents to work close to where they live, but has the potential to bring life and vibrancy outside normal working hours to this largely industrial area. Increasing employment will enable Brookvale to continue to be a 'One Stop Shop', providing an important local source of building and vehicular supplies and labour to the people of the Northern Beaches. It is encouraging that Brookvale is already attracting other forms of business, such as cafes and eateries, recreation centres and gymnasiums, as well as after-hour establishments, which bring diversity to the suburb.

**SPECIFIC COMMENTS**

***Connectivity***

Brookvale is divided down the centre by a heavily trafficked six lane road corridor, Pittwater Road. It forms a barrier for pedestrians traversing between East and West Brookvale. NSLHD Health Promotion commends state and local authorities for building the overhead walkway between Brookvale Community Health Centre and Warringah Mall, which enables a safe crossing of Pittwater Road at the southern end of the Investigation Area. However Pittwater Road lacks sufficient locations for pedestrians to cross safely between Cross Street and Winbourne Road. This problem is demonstrated by barricades Council erected on the median strip to stop pedestrians crossing away from traffic lights. Whilst it is noted that the BSP provides for improved pedestrian crossings at Pittwater Road's intersections with Cross Street and Winbourne Road, which may improve pedestrians' comfort as they wait to cross, improvements to pedestrian connectivity will be limited.

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<sup>1</sup> NSW Ministry of Health. (2020). Healthy Built Environment Checklist. A guide for considering health in development policies, plans and proposals. <https://www.health.nsw.gov.au/urbanhealth/Publications/healthy-built-enviro-check.pdf>

The draft Brookvale Structure Plan envisages seven to eight storey buildings on both sides of Pittwater Road in this area (Precincts 2 and 3), which will increase pedestrian traffic markedly.

### Recommendation

- That consideration is given to incorporate overhead walkways across Pittwater Road, between the Cross Street and Winbourne Road intersections. This will improve pedestrian connectivity between East and West Brookvale at the Northern end of the Investigation Area and improve traffic flow along this major arterial route.

### **Permeability**

The Draft Brookvale Structure Plan's proposal to increase the permeability of Western Brookvale, by connecting the areas from the Western portion of Cross St through to Pittwater Rd is commended, as is increasing the permeability of Eastern Brookvale, by connecting Powells Road to Grosvenor Place, Pittwater Road and Orchard Road. This will enable greater pedestrian, bicycle and motor vehicle movement, thereby increasing activation in Precincts 2, 3 and 5.

### **Social interaction, Active Living, Healthy Eating and Safety**

NSLHD Population Health Promotion welcomes Council's proposal to create a town square in Precinct 1, where residents will be able to meet and socialise. A place to congregate is vital to building a sense of community, which in turn fosters enhanced physical safety and psychological health. We also support the proposal to activate Winbourne Road Car Park and nearby laneways to enhance the social amenity of to Eastern Brookvale.

The industrial centre of Brookvale also provides an opportunity for street activation on weekends when it is largely underutilised. Health Promotion supports temporary street closures and welcomes any opportunity to partner with Council on initiatives to deliver short-term changes to the local streets and paths to create shared spaces for people and transport.

### Recommendations

- Provide adequate seating and shelter when activating the Winbourne Road Car Park, to encourage people to linger and interact with each other. Seating should be of an appropriate height to accommodate seniors.
- Supply bike racks throughout the investigation area, particularly the proposed town centre in visible, accessible locations.
- Approve building designs that promote the use of stairs to encourage incidental physical activity. For example, design stairs to be accessible, user-friendly and positioned near (or visible from) entrances.
- Allow for the provision/supply of fresh fruit and vegetables available for purchase in the proposed town centre and within 400m of all residences. If possible, encourage fruit and vegetable outlets to have attractive shop frontage displays to encourage people to purchase.
- Consider provision of space for a small scale farmers' market to take place regularly in the proposed Town Centre and/or Winbourne Road Car Park. Sunday may be a suitable day if a commercial or industrial site is unused.
- Implement Tactical Urbanism/place-making strategies such as street play initiatives to activate the industrial centre on weekends.
- Provide drinking water fountains in the proposed town centre to encourage water consumption, as it is the best choice of any beverage.
- Ensure that passive surveillance is optimised by appropriate lighting and use of shrubs which do not obstruct lines of sight, in accordance with NSW Police's 'Crime Prevention by Environmental Design'<sup>2</sup>.

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<sup>2</sup> NSW Police's 'Crime Prevention by Environmental Design' (CPTED). (2001).  
[www.police.nsw.gov.au/data/assets/pdf\\_file/0003/9390/duapguide\\_s79c.pdf](http://www.police.nsw.gov.au/data/assets/pdf_file/0003/9390/duapguide_s79c.pdf) (cited 12 January 2023).

## Sustainability

The NSW Movement and Place mapping tool indicates that the suburb of Brookvale falls well short (less than 10%) of the Greater Sydney Commission's target of 40% tree canopy coverage. We encourage Council to continue to prioritise and improve the tree canopy across all precincts. An Australian study of 46,786 adults indicated that exposure to a tree canopy of 30% or more was associated with a lower incidence of psychological distress<sup>3</sup>.

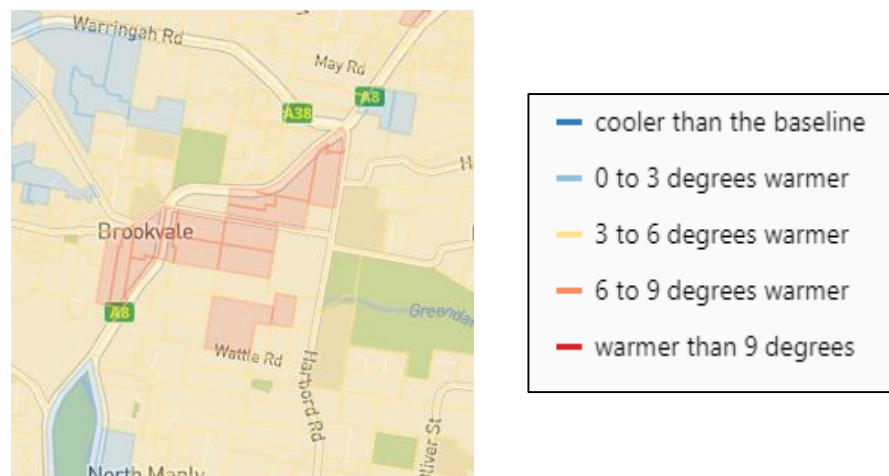
Figure 4: Percentage of tree canopy



Source: NSW Movement and Place website (2022)

The NSW Movement and Place Urban Heat Map (Figure 5) indicates that the industrial centre of Brookvale is one of the warmest locations on the Northern Beaches. This is largely due to the lack of shade and green space, as well as the dense concentration of pavement, buildings and other surfaces that absorb and retain heat.

Figure 5: Urban Heat - Surface temperatures relative to a non-urban vegetated reference



Source: NSW Movement and Place website (2022)

Greener and more resilient public spaces are key features in DPIE's Public Space Charter<sup>4</sup>. Public spaces that are softer, greener and more connected to nature, can cool towns and cities, providing relief, respite and reduce the impacts of extreme weather conditions. Public spaces can also provide a network of essential hubs that bring communities together and provide refuge and escape, while building our capacity to withstand shocks during times of crisis.

<sup>3</sup> Astell-Burt, T. and Feng, X., 2019. Association of Urban Green Space with Mental Health and General Health Among Adults in Australia. JAMA Network Open, 2(7), p.e198209.

<sup>4</sup> NSW Department of Planning, Industry and Environment website, NSW Public Spaces Charter. Available at: [https://www.dpie.nsw.gov.au/premiers-priorities/great-public-spaces/festival-of-place/public-spaces-charter#:~:text=The%20NSW%20Public%20Spaces%20Charter%20\(PDF%207.3MB\)%20has%20been,space%20experts%20and%20community%20members](https://www.dpie.nsw.gov.au/premiers-priorities/great-public-spaces/festival-of-place/public-spaces-charter#:~:text=The%20NSW%20Public%20Spaces%20Charter%20(PDF%207.3MB)%20has%20been,space%20experts%20and%20community%20members) (cited 18 January 2023).

## Recommendations

- Include local native flora that attract and support local wildlife in the landscaping plans. Use the NSW Government Architect's Draft Greener Places Design Guide when planning, designing and implementing green infrastructure<sup>5</sup>.
- Prioritise street tree planting, particularly within the industrial centre, to improve amenity and provide shade, which reduces urban heat stress, helps prevent skin cancer from UV radiation and supports walkability<sup>6</sup>.
- Future proof play grounds using climate smart design and surfaces that reduce heat impacts, as per the *Cool Schools Guide*<sup>7</sup> and *Guide to Climate-Smart Playgrounds: Research Findings and Application*<sup>8</sup>.
- Set a minimum target of 40% tree canopy coverage for the suburb of Brookvale.
- Consider how urban heat and extreme weather events, which have a negative impact particularly on our vulnerable communities, will be addressed through the choice of building materials and design e.g. pavement surfaces, green and blue infrastructure, renewable energy sources for lighting.

## Local Schools

The BSP proposes to increase the number of dwellings by 1,300, which will place increased demand on social infrastructure including local schools. Consideration must be given to ensure Brookvale Public School's capacity sufficiently caters for the resultant growth in student numbers. Student enrolments will be further increased by school catchment changes in 2023, as there will be students enrolling at Brookvale Public School who previously would have enrolled at Dee Why Public School. Insufficient school play space can impact student health and wellbeing, as well as educational outcomes.

## Recommendations

- Ensure the school and its community are comprehensively consulted on all aspects of the BSP that may impact them and that co-designed plans are put in place to accommodate any potential impacts<sup>9</sup>.
- Review current bicycle and footpaths to enable safe cycling and walking to school.
- In consultation with the NSW Department of Education, ensure students have access to more than 20sqm play space per student during school hours<sup>9</sup>.

## Proposed Brookvale Town Square

Research suggests that planning for public space should consider multiple users. Design for multiple uses is important in ensuring that a range of user groups are able to use public spaces throughout different times of the day<sup>1</sup>. The success of the proposed Brookvale Town Square will be in its ability to engage the various users of Brookvale including families, young people, older adults, workers and visitors. Planning for the public domain should incorporate facilities such as community gardens, performance spaces, playgrounds, outdoor dining areas, green spaces dedicated to passive and active recreation and exhibition spaces.

## Recommendations

- That Brookvale Town Square and other opportunity areas (e.g. Brookvale Northern Park, Brookvale Oval and Brookvale Community Centre) include multipurpose spaces that encourage intergenerational recreation e.g. children's play equipment placed adjacent to fitness spaces and community gardens. These spaces will better cater for the whole community, from pre-schoolers through to the elderly.

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<sup>5</sup> NSW Government Architect, Draft Greener Places Design Guide. <https://www.governmentarchitect.nsw.gov.au/policies/greener-places> (cited 12 January 2023).

<sup>6</sup> NSW Shade Working Group, Shade - A planning and design priority to help prevent skin cancer. (2019). <https://www.cancer.nsw.gov.au/getmedia/be5ca26a-3755-4487-a698-fa843cfaf023/WR-MR0010096-A4-ShadePlanning-CI-0002-01-20.pdf> (cited 12 January 2023)

<sup>7</sup> Madden, A.L., Arora, V., Holmes, K.A., Pfautsch, S. (2018). Cool Schools. Western Sydney University. 56 p. <https://researchdirect.westernsydney.edu.au/islandora/object/uws%3A47915> (cited 12 January 2023)

<sup>8</sup> Pfautsch, S., & Wujeska-Klaue, A. (2021). Guide to Climate-Smart Playgrounds: Research Findings and Application. <https://researchdirect.westernsydney.edu.au/islandora/object/uws:60046> (cited 12 January 2023)

<sup>9</sup> Anne Grunseit, Blythe O'Hara, Bradley Drayton, Vincent Learnihan, Louise L Hardy, Eve Clark, Paul Klarenaar, Lina Engelen (2020) *Ecological study of playground space and physical activity among primary school children*. Available at: <https://bmjopen.bmj.com/content/10/6/e034586> (cited 18 January 2023)

- Ensure that local schools, childcare centres and other relevant services are provided access to these spaces<sup>9</sup>.
- Incorporate evidence-based 'nature play' design features where possible and appropriate, using the experience of current 'nature play' playgrounds that challenge and connect with nature<sup>10</sup>.

### Higher Density Living

Current evidence suggests that well designed higher density housing in compact neighbourhoods, can support physical activity, social interaction and access to daily living needs, compared to low density neighbourhoods<sup>11</sup>. This can be attributed to higher residential densities bringing destinations closer together and supporting the presence of local shops, services and public transport with more people, which encourage walking or cycling.

Design of higher density dwellings can also impact on the health and wellbeing of residents. Circulation routes and spaces in apartment buildings can create opportunities to form social ties and common areas should encourage longer interactions<sup>12</sup>. This includes indoor and outdoor spaces and common areas on various floors in larger developments. Other features which foster social interactions include shaded seating, communal space, green space, access arrangements, regular maintenance, adequate storage and car and bicycle parking.

Conversely, poor quality apartment design has the potential to detrimentally impact the health and wellbeing of residents. Unlike detached housing, high density housing can have lasting impacts on generations of residents and communities as defects and poor design is difficult and costly to repair and retrofit.

NSLHD Health Promotion is currently coordinating a citizen science study on the experiences of residents living in higher density living and we commend Northern Beaches Council for their involvement in this project.

### Recommendations

- That the design and location of higher density dwellings adhere to the checklist provided in *Healthy Higher Density for Kids*<sup>13</sup>.
- That Council adopt the healthy higher density resources that are developed from the research project and incorporate findings into future planning processes.

NSLHD Health Promotion thanks Northern Beaches Council for the opportunity to comment on the revised Draft Brookvale Structure Plan. It is a positive, constructive plan to enhance the liveability of those living and working in Brookvale and the surrounding suburbs.

For further information on this submission or opportunities to collaborate please contact our Healthy Built Environments Manager Jonathon Noyes [jonathon.noyes@health.nsw.gov.au](mailto:jonathon.noyes@health.nsw.gov.au) or 8797 7311.

Yours sincerely,

### Paul Klarenaar

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<sup>10</sup> Nature Play Guidelines. (2019). Office of Open Space and Parklands, Department of Planning and Environment, Sydney NSW. <https://www.everyonecanplay.nsw.gov.au/nature-play> (cited 12 January 2023).

<sup>11</sup> Krysiak N (2018). Design and Planning Policy for Family-Friendly Apartment Living (Draft Article). Policy Futures: A Reform Agenda.

<sup>12</sup> Foster, Hooper, P., Kleeman, A., Martino, E., & Giles-Corti, B. (2020). The high life: A policy audit of apartment design guidelines and their potential to promote residents' health and wellbeing. *Cities*, 96, 1–13. <https://doi.org/10.1016/j.cities.2019.102420>

<sup>13</sup> Heenan R. (2017). Healthy Higher Density for Kids. The Effects of High Density Housing on Children's Health and Development: A literature review to inform policy development in Western Sydney.