



03 September 2021

Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW
2124

To whom it may concern,

SUBMISSION TO THE DRAFT FRENCHS FOREST PLACE STRATEGY 2041

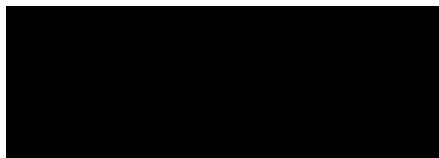
This submission has been prepared by AE Design Partnership on behalf of Mr Tony Dreise, Mrs Sharon Dreise, Ms Stephanie Lang and Mrs Melissa Telfer in response to the Draft Frenchs Forest Place Strategy 2041.

This submission relates to the development potential of the subject site at 2 & 4 Gladys Avenue.

The objectives of this submission are to:

- Highlight issues with the development controls proposed in the 2041 Place Strategy.
- Provide an alternate desired future character and DCP controls for the Frenchs Forest Road West Neighbourhood.
- Recommend alternate LEP controls for the site at 2-4 Gladys Avenue and adjoining lots in the northern half of the Frenchs Forest West Neighbourhood.

Sincerely,
ae design partnership Pty Ltd



Rohan Dickson
Director



ATTACHMENTS

1. 210903 – Submission to 2041 Frenchs Forest Place Strategy

2 & 4 Gladys Avenue, Frenchs Forest

Submission to Draft Frenchs Forest Place Strategy



ae design partnership has prepared this document for the sole use of the
**MR TONY DREISE, MRS SHARON DREISE, MS STEPHANIE LANG AND MRS
MELISSA TELFER.**

No other party should rely on this document without the prior written consent of
ae design partnership.

ae design partnership may also have relied upon information provided by the
Client and other third parties to prepare this document.

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1. Introduction



1.1 Purpose

This submission has been prepared by AE Design Partnership on behalf of Mr Tony Dreise, Mrs Sharon Dreise, Ms Stephanie Lang and Mrs Melissa Telfer in response to the:

- Draft Frenchs Forest Place Strategy 2041
- Draft Warringah DCP 2011 - Part G9 Frenchs Forest Town Centre

This submission relates to the development potential of the subject site at 2 & 4 Gladys Avenue.

The objectives of this submission are to:

- Highlight issues with the development controls proposed in the 2041 Place Strategy.
- Provide an alternate desired future character and DCP controls for the Frenchs Forest Road West Neighbourhood.
- Recommend alternate LEP controls for the site at 2-4 Gladys Avenue and adjoining lots in the northern half of the Frenchs Forest West Neighbourhood.

1.2 Background

Planning for the area surrounding the Northern Beaches Hospital has had a long and chequered history. There have been several iterations of proposals to rezone land by both Local and State Governments since 2010.

The **Frenchs Forest Place Strategy 2021** is the latest strategy to be released. It was placed on exhibition by the Department of Planning, Industry and Environment on the 23rd of July 2021. Concurrently, Northern Beaches Council placed amendments to the **Warringah Development Control Plan 2011** on exhibition.



2. The Site



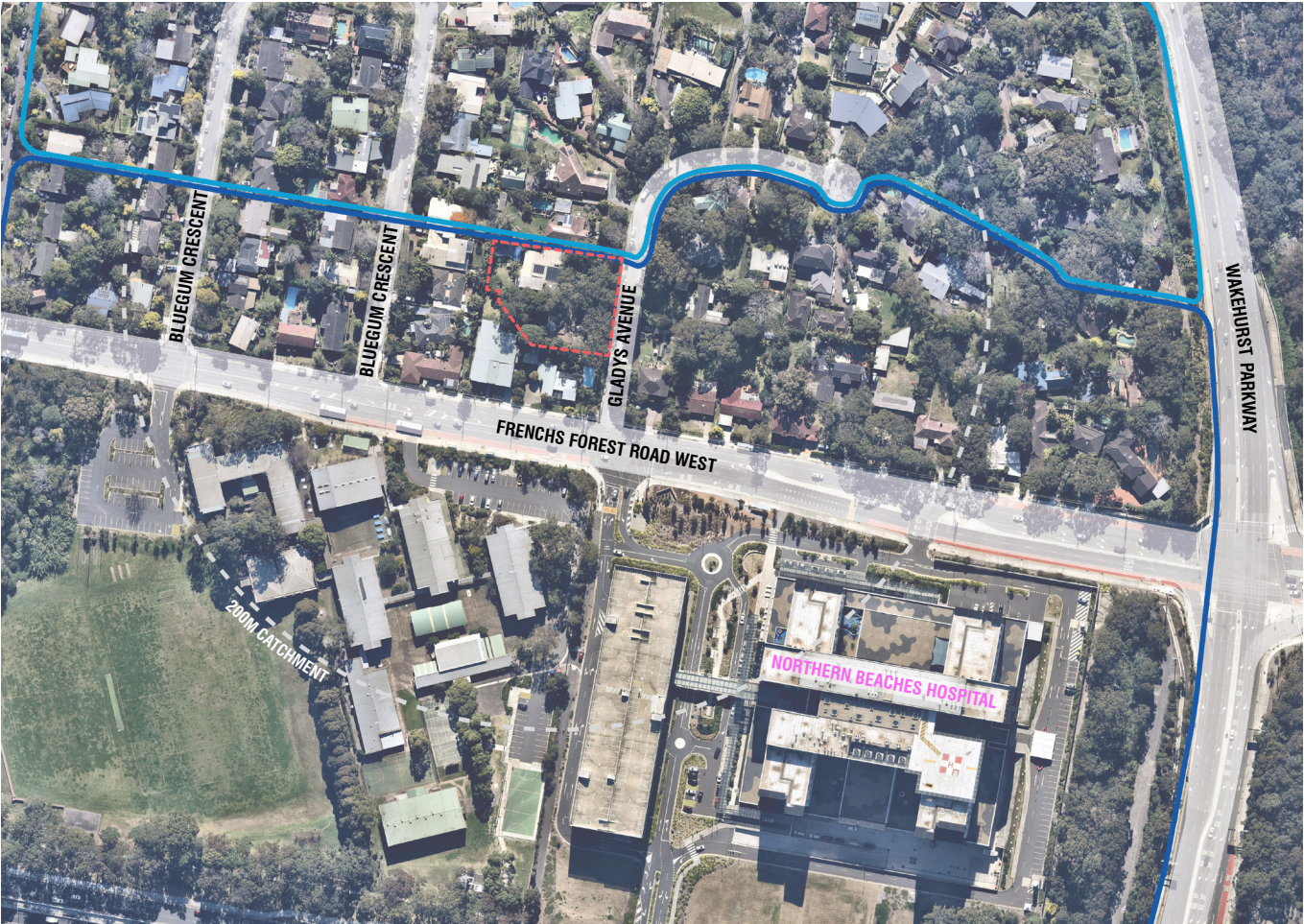
The subject site consists of two adjoining lots at 2 and 4 Gladys Avenue which are legally known as 1/DP25713 and 3/DP25713.

The site has a combined total area of 2,490m² and a 46m frontage to Gladys Avenue. It is currently occupied by a one storey house at 2 Gladys Avenue and a two storey house at 4 Gladys Avenue.

The site is located on the northern side of Frenchs Forest Road West within 200m of the new Northern Beaches Hospital.

Under the existing Warringah LEP 2011, the site is subject to the following development:

Control	Applicable to Subject Site
Zone	<ul style="list-style-type: none">R2 Low Density Residential
HOB	<ul style="list-style-type: none">8.5m
FSR	<ul style="list-style-type: none">NA



LEGEND

Subject Site

Frenchs Forest Precinct

Future Investigation Area

Figure 1: Site Context ⓘ

3. History

3.1 State Significant Site

In 2010 the Department of Planning, Industry and Environment (formerly NSW Department of Planning) exhibited amendments to State Environmental Planning Policy (Major Development) 2005 to facilitate the rezoning of land in Frenchs Forest for residential, mixed use, business park and commercial purposes and health service facilities to accommodate the proposed Northern Beaches hospital.

The amendment proposed the following controls for residential areas within the precinct:

Control	Applicable to Subject Site
Zone	• R3 Medium Density Residential
HOB	• 12m - 17m
FSR	• 1.5:1 - 2.0:1

3.2 Hospital Precinct Structure Plan

In 2017 Northern Beaches Council released the Hospital Precinct Structure Plan.

The 2017 Structure Plan reduced the scale of the precinct compared to the area earmarked by the NSW Government in 2010. As illustrated in **Figure 2**, the amended precinct boundary now ran along the subject site's northern boundary and meant that lots to the north were no longer included in the Structure Plan.

The 2017 Hospital Precinct Structure Plan proposed the following controls to the subject site:

Control	Applicable to Subject Site
Zone	• R3 Medium Density Residential
HOB	• 17.5m
FSR	• 1.7:1



LEGEND




-  Subject Site
-  2017 Boundary
-  2010 Boundary

Figure 2: Structure Plan Boundary Comparison

4. Frenchs Forest Place Strategy 2041



4.1 Structure Plan & Proposed Controls

The Northern Beaches 2041 Strategy proposes the following LEP development controls for the site:

Control	Applicable to Subject Site
Zone	<ul style="list-style-type: none">R3 Medium Density Residential
HOB	<ul style="list-style-type: none">13m
FSR	<ul style="list-style-type: none">1.0:1

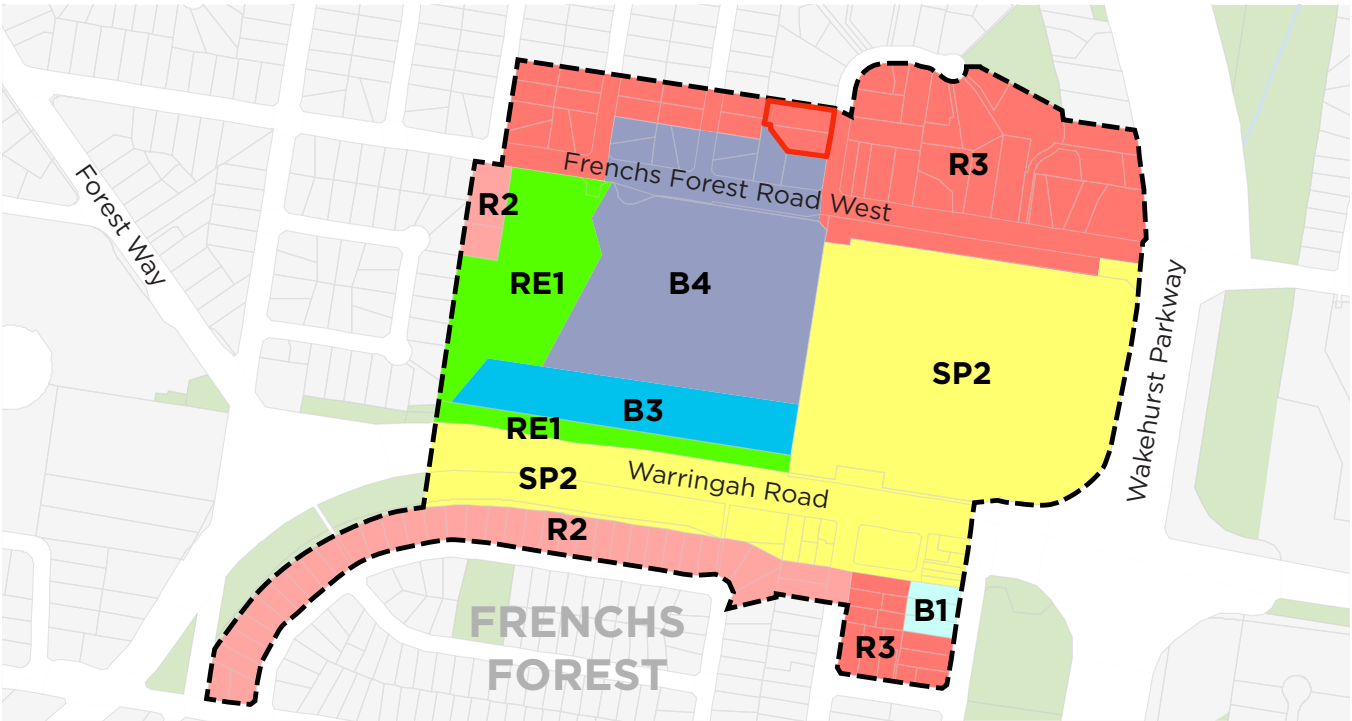


Figure 3: 2041 Place Strategy - Proposed Land Zone

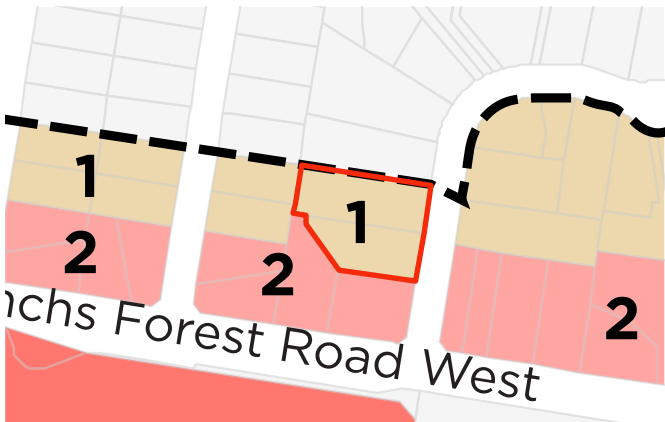


Figure 4: 2041 Place Strategy - Proposed FSR

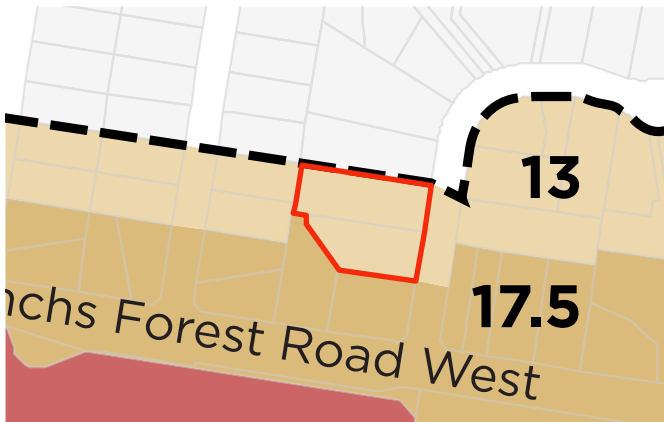


Figure 5: 2041 Place Strategy - Proposed Maximum Building Height

4.2 Council's Desired Future Character

Council's desired future character is derived from the character statement and controls outlined in Section 5.2 Precinct 05 - Frenchs Forest Road West Neighbourhood of the draft Warringah DCP 2011 - Part G9 Frenchs Forest Town Centre.

Character Statement

The Frenchs Forest Road West Neighbourhood will provide a contextually appropriate interface to surrounding low density residential areas, whilst increasing housing diversity and activating Frenchs Forest Road West with a range of retail, office and medical uses to support the town centre and Hospital. The precinct will be characterised by:

- *High quality medium rise apartment buildings, up to 6 storeys to create a new urban residential character to the north of Frenchs Forest Road West.*
- *Mixed use buildings with a range of ground floor uses, located directly opposite the town centre on Frenchs Forest Road West to create an active and engaging streetscape.*
- *Non-residential ground floor uses along Frenchs Forest Road West, including medical and health related uses, supporting the Northern Beaches Hospital.*
- *On Frenchs Forest Road West, close to Wakehurst Parkway, hotels and serviced apartments will support the operation of the Northern Beaches Hospital.*
- *A pedestrian focused street with no vehicular access from Frenchs Forest Road West to deliver a high quality streetscape on Frenchs Forest Road West.*

(Page 49 Draft Part G9 - Frenchs Forest Town Centre Warringah Development Control Plan)

The quintessential planning controls that inform building envelopes for the Frenchs Forest Road West Neighbourhood Precinct are outlined below.

Building Setbacks

- To provide a consistent streetscape along Frenchs Forest Road West
- To provide landscaped streetscapes consistent with those of adjacent low-density residential areas for all street frontages other than Frenchs Forest Road West.
- To ensure spatial separation between buildings that will provide an appropriate interface to adjoining low density residential areas.
 - 3.5m front setback on the northern side of Frenchs Forest Road West.
 - 6.5m setback to Sylvia Place, Bluegum Crescent and Gladys Avenue.
 - Nil side setback for development fronting Frenchs Forest Road West.
 - Development adjacent to the R2 Low Density Residential and RE1 Public Recreation Zone must provide a minimum setback of 6m from the side or rear property boundary for the first 2 storeys. Development above 2 storeys is to be set back within a 45-degree angle, projected from a height of 2 storeys.

Street wall and upper level setbacks

- To reduce bulk and scale of buildings, minimise streetscape impacts and provide an appropriate scale transition to adjoining low density residential development.
 - 3m 5th storey setback for development fronting Frenchs Forest Road West.
 - 3m 4th storey setback for development fronting Gladys Avenue.
 - Any portion of a building within 12m of R2 Low Density Residential zoned land must be no more than 2 storeys.
 - Any portion of a building within 12m of RE1 Public Recreation zoned land must be no more than 3 storeys.

Landscaped Area

- To ensure that new development achieves the Desired Future Character and Character Statement for the precinct.
 - To retain existing trees, encourage new tree plantings and maximise deep soil areas.
 - To ensure communal open space minimises amenity impacts to adjoining neighbours.
 - For all residential flat building developments, landscaped area is to be at least 45% of the site area.

5. Opportunities



5.1 Review of 2041 Place Strategy

A section diagram prepared by CHROFI and Architectus (**Figure 6**) shows the potential built form the precinct based on the development controls proposed in the 2041 Place Strategy.

The diagram shows a predominately four storey building on the site. Based on the proposed FSR of 1.0:1 this envelope does not reflect a true built form outcome as demonstrated in **Section 6.1**.

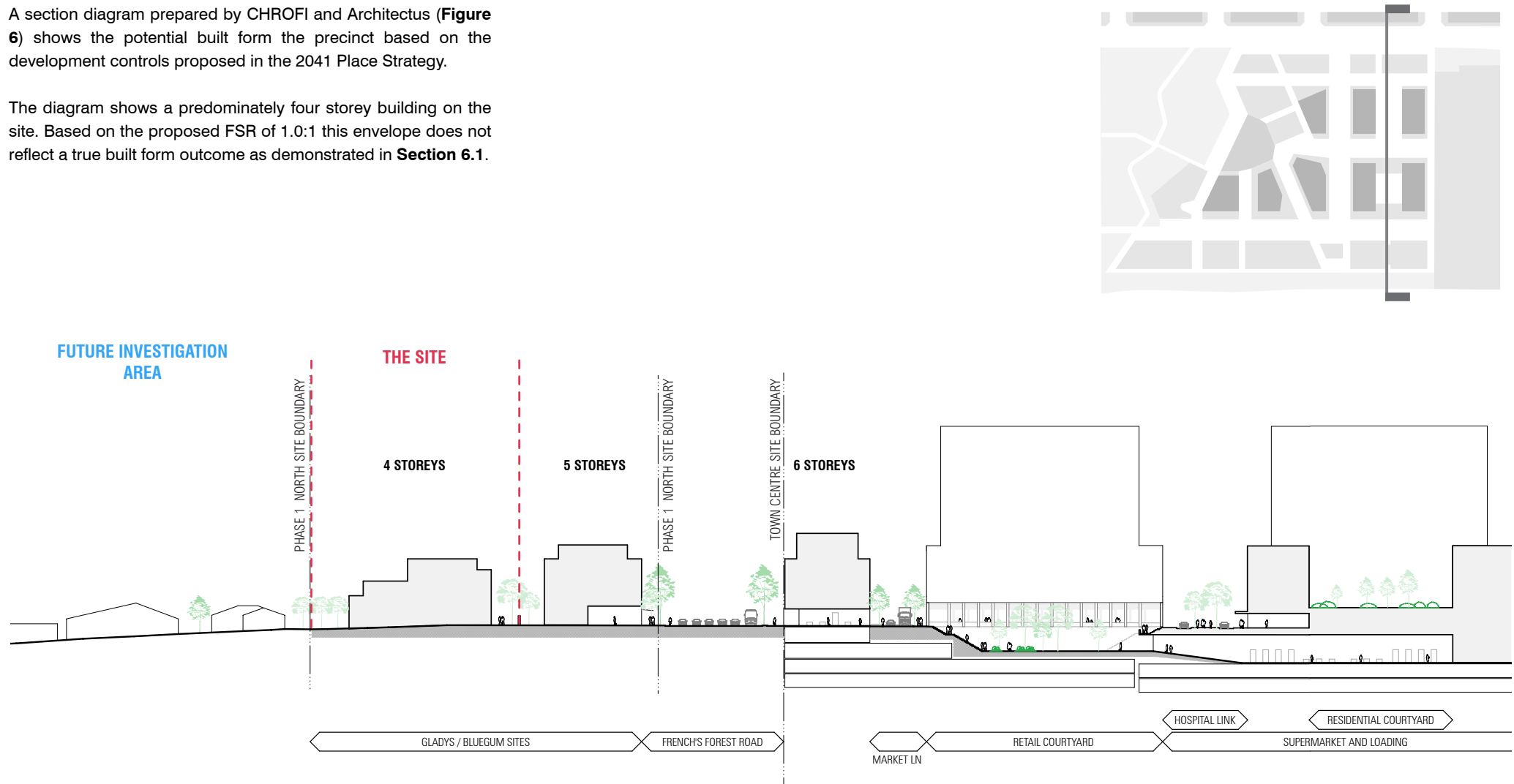


Figure 6: Proposed Built Forms (CHROFI + Architectus)

5.2 Future Investigation Area

Consistent with the 2017 Hospital Structure Plan, the 2041 Place Strategy Structure Plan earmarks the area to the north of the Frenchs Forest Precinct as 'future investigation area'.

Lots within this area are currently zoned R2 Low Density Residential and have a maximum building height of 8.5m (2 storeys).

If the development controls in the 2041 Place Strategy are implemented as proposed, lots along Gladys Avenue and Bluegum Crescent will be subject to three different zones and densities. This is a poor planning outcome and will result in an undesirable streetscape with buildings ranging from five storeys to one storey within 100m of each other.

Further, implementation of the proposed controls will define the desired future character for the entire street as medium density development, regardless of whether they are zoned now or in the future. This leaves lots within the future investigation zone highly susceptible to spot rezoning.

It is anticipated that as infrastructure in the area improves, there will be a capacity to provide uplift to lots within this future investigation area.

For these reasons it is critical the proposed development controls in the 2041 Place Strategy take into account the impending uplift of the future investigation area.

This uplift would likely result in:

- Rezoning to R3 Medium Density Residential
- Maximum building height which allows for 3 to 4 storeys
- 1.0:1+ FSR which supports 3 to 4 storey buildings

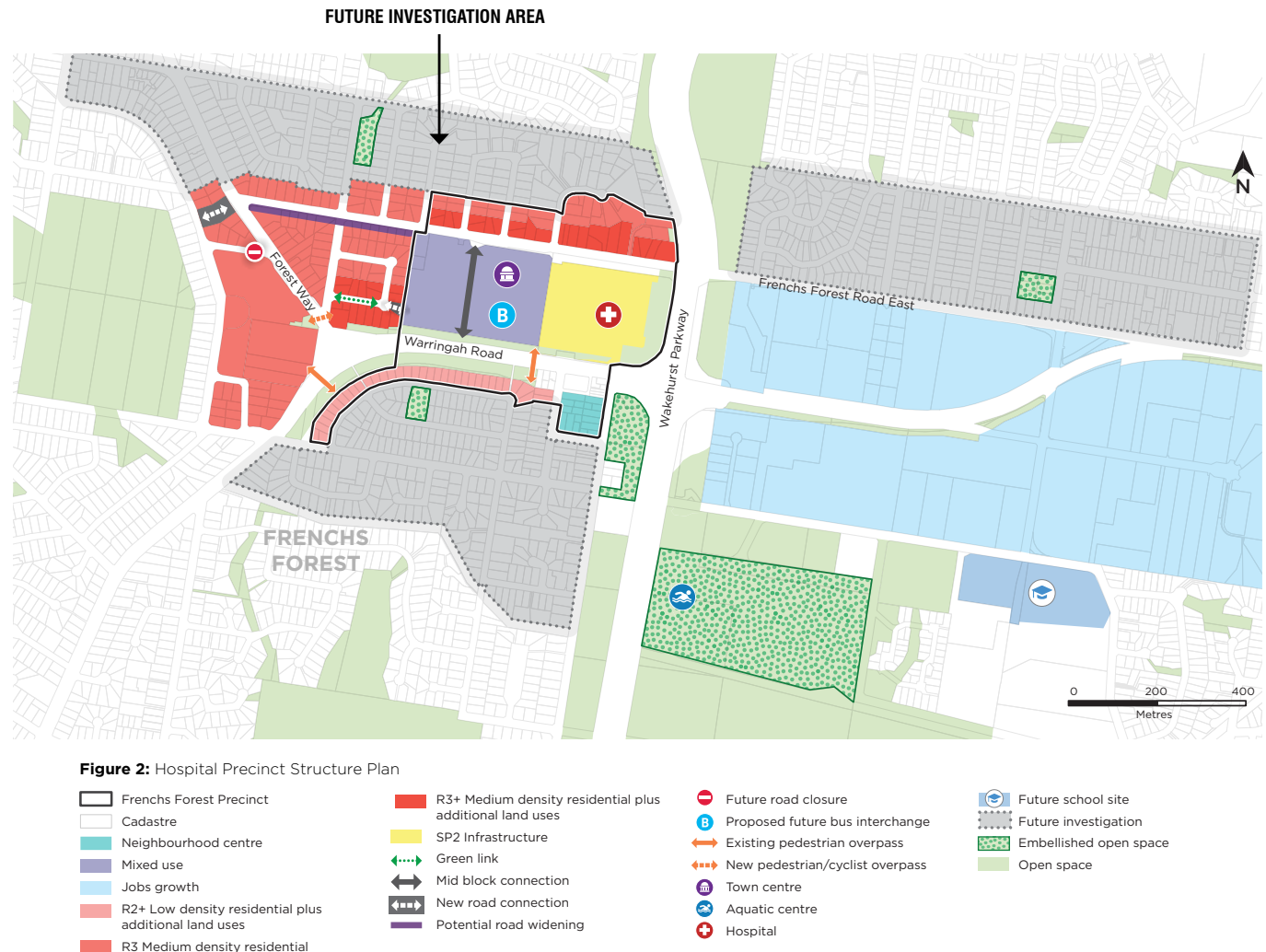


Figure 7: Hospital Precinct Structure Plan

5.3 Summary of Opportunities

The future Frenchs Forest Town Centre is bound by Warringah Road to the south, Northern Beaches Hospital to the east and open space to the west. Consequentially, future growth of the Town Centre can only occur to the north beyond the precinct and into the future investigation area.

- ① **Align Town Centre with Existing Urban Structure**
 - The urban structure of the Town Centre should reflect the existing road alignment to provide strong connectivity between the residential area and the Town Centre and reduce the number of intersections along Frenchs Forest Road West.
- ② **Focus Highest Residential Density in Blocks with connection to Town Centre**
 - Densities should be highest within the area bound by the maroon belt due to the spatial relationship and connection to the Town Centre.
- ③ **Transition to Future Investigation Area**
 - Built forms should provide an appropriate transition to anticipated future 3-4 storey developments in the 'future investigation area'

LEGEND

- Subject Site
- Cadastre
- Frenchs Forest Precinct
- Future Investigation Area
- Existing Open Space
- Future Open Space
- Town Centre
- Northern Beaches Hospital
- Residential Development
- Connection to Town Centre

Figure 8: Opportunities



6. Outcomes



6.1 1.0:1 FSR Outcome

A potential built form on the site at 2-4 Gladys Avenue is based on:

- A 1.0:1 FSR as proposed in the 2041 Place Strategy
- Setback controls and minimum 45% landscaped area requirement proposed in the Draft DCP.

The outcome is a predominately 3 storey and part 2 storey building envelope with 49% site coverage.

This outcome is inconsistent with the:

- 13m (4 storey) heights anticipated by the 2041 Place Strategy
- Desire for *High quality medium rise apartment buildings* as envisioned in the Frenchs Forest Road West Neighbourhood character statement.

Further, this built form results in an undesirable built form transition to the anticipated 3 to 4 storey buildings in the 'future investigation area'.

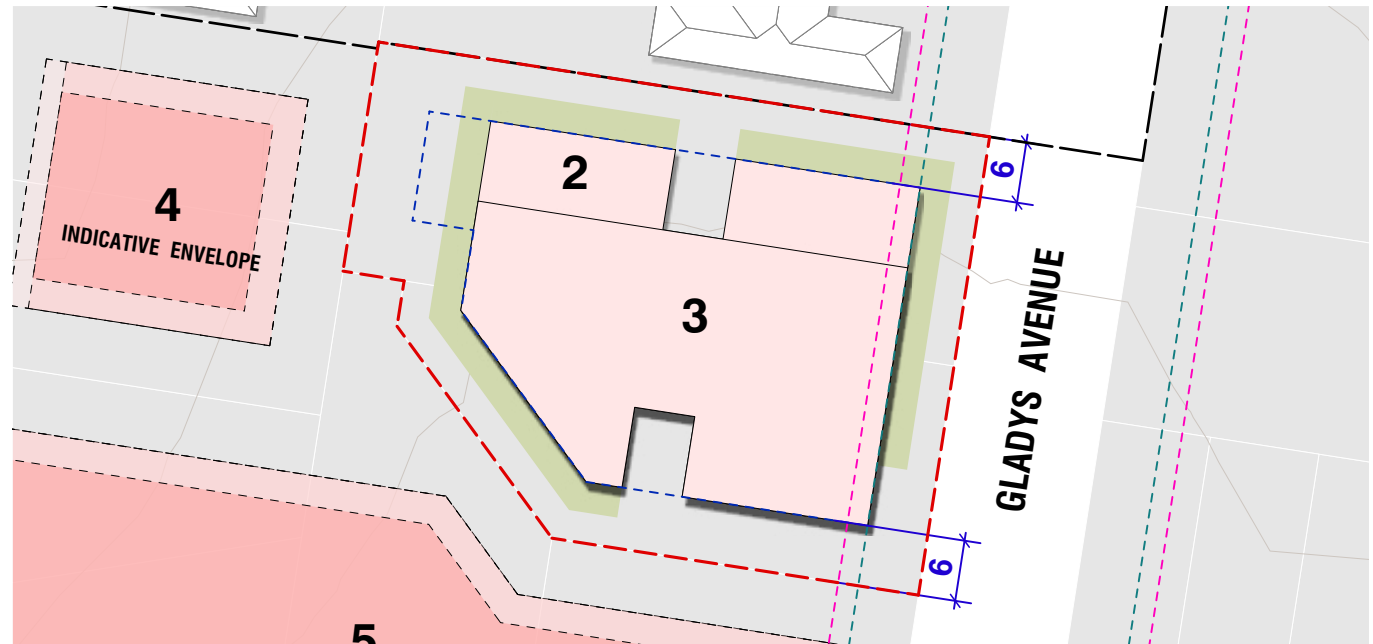


Figure 9: 1.0:1 FSR Outcome

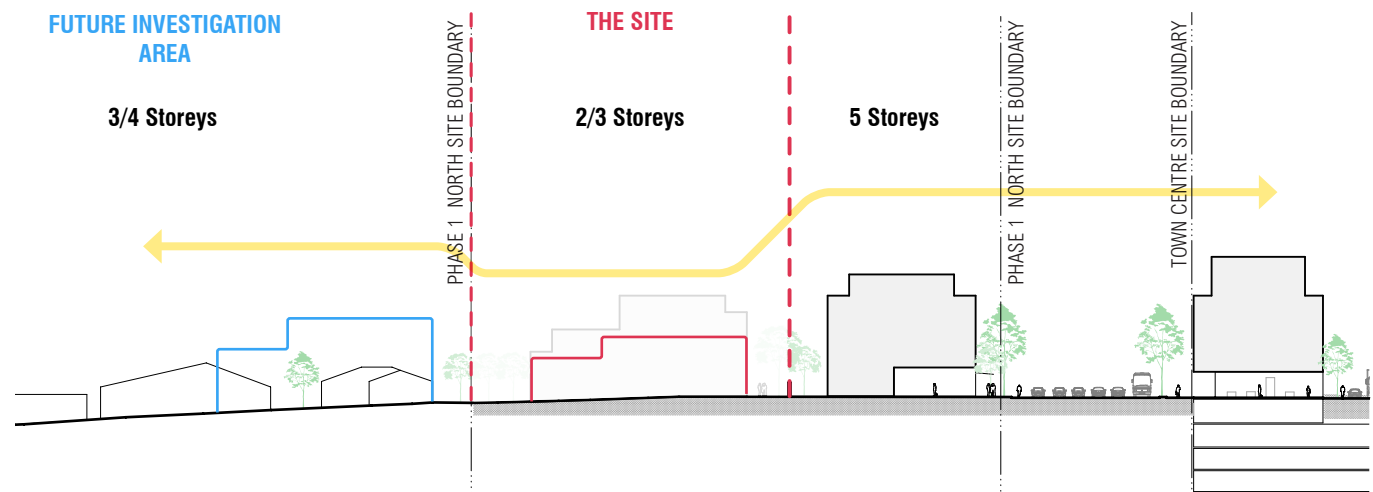


Figure 10: 1.0:1 FSR Built Form Transition Outcome

6.2 1.7:1 FSR Outcome 1

A preferred outcome for the site relies on an FSR of 1.7:1. This outcome also compiles with the setback controls and minimum 45% landscaped area requirement proposed in the Draft DCP.

A 1.7:1 scheme on the site at 2-4 Gladys Avenue results in:

- A 5 storey built form.
- 5th storey setback 3m from all boundaries.
- 49% site coverage which ensures 45% of the site can be maintained as landscaped area.
- ADG compliant separation distances.

YIELD SUMMARY

SITE AREA	2,479 m ²	TOTAL GFA	4,115 m ²
SITE COVERAGE	49%	FSR	1.7:1
		TOTAL DWELLINGS	51

STOREY	BUILDING ENVELOPE		GROSS FLOOR AREA		NUMBER OF APARTMENTS (80m ²)
	AREA	USE	EFFICIENCY	GFA	
1	1,222 m ²	RESIDENTIAL	65%	794 m ²	10
2	1,222 m ²	RESIDENTIAL	75%	917 m ²	11
3	1,222 m ²	RESIDENTIAL	75%	917 m ²	11
4	1,121 m ²	RESIDENTIAL	75%	841 m ²	11
5	862 m ²	RESIDENTIAL	75%	647 m ²	8
TOTAL	5,649.15 m ²			4,115 m ²	51

LEGEND

- Subject Site
- Cadastre
- Street Front Setbacks
- 3m Upper Level Setback
- 6m ADG Separation

Figure 11: 1.7:1 FSR Outcome - Option 1



7. Financial Viability



It goes without saying that the success of the Frenchs Forest 2041 Place Strategy will depend not only on its design but also whether the proposals are financially viable for both residents/property owners and developers.

We are not qualified to comment on this aspect of the proposals.

Nevertheless, it is our clients' strong understanding that developers have consistently put the view that a low FSR such as that now proposed is not sufficient to support medium density development of the desired future character. It also goes without saying in their view that owners will not be incentivised to sell and make way for development, if the return is insufficient to buy an appropriate property elsewhere.

This issue was expressly recognised by the Council at page 14 of the 2017 Northern Beaches Hospital Precinct Structure Plan (**Figure 13**) where it states:

"A revision of Floor Space Ratios (FSRs) has occurred to ensure feasibility in the immediate to short term based on current land values"

Our clients strongly urge that the Department takes this into account in finalising these proposals.

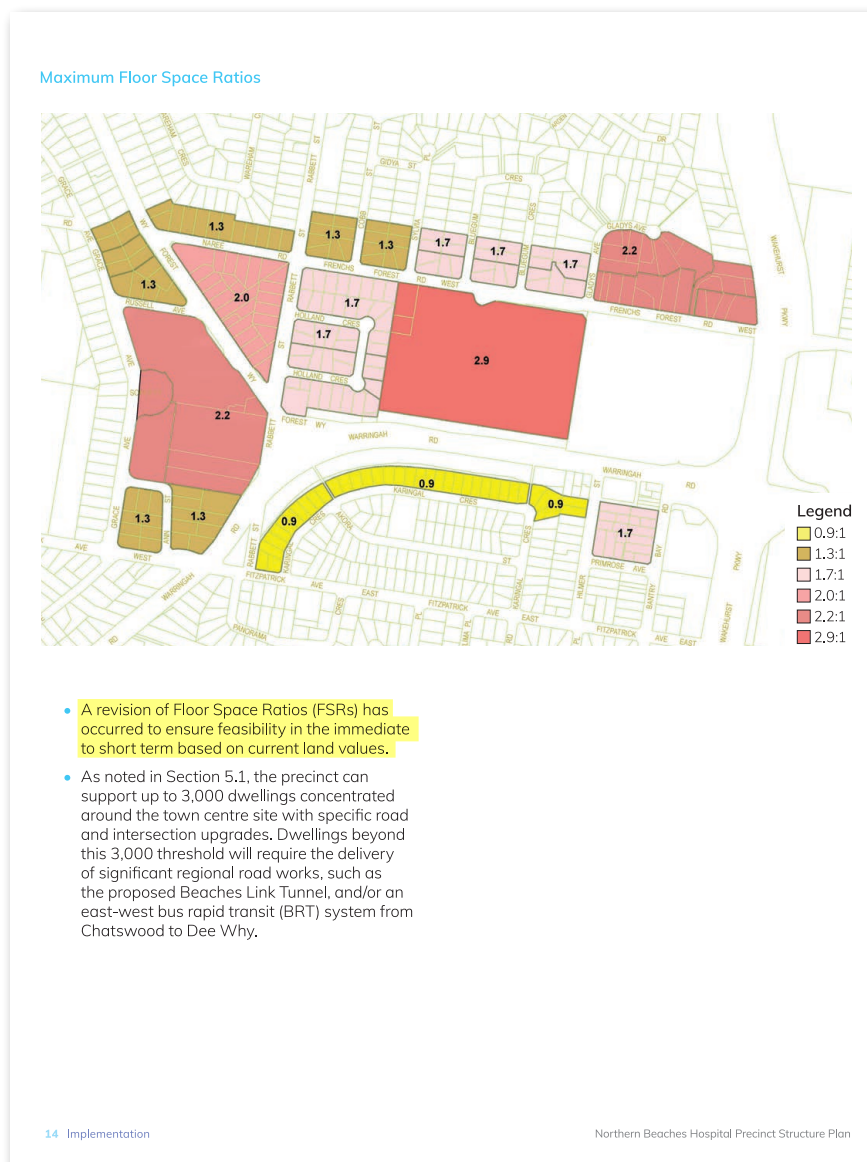


Figure 13: Page 14 - 2017 Northern Beaches Hospital Precinct Structure Plan

8. Recommendations



8.1 Recommended Desired Future Character

Amendments to the character statement are shown in blue.

Character Statement

The Frenchs Forest Road West Neighbourhood will provide a contextually appropriate interface to *the future investigation area*, whilst increasing housing diversity and activating Frenchs Forest Road West with a range of retail, office and medical uses to support the town centre and Hospital. The precinct will be characterised by:

- High quality medium rise apartment buildings, up to 6 storeys to create a new urban residential character to the north of Frenchs Forest Road West.
- *Heights of buildings on the periphery of the precinct to provide appropriate built form transition to the anticipated 3-4 storey buildings in the 'future investigation area'.*
- Mixed use buildings with a range of ground floor uses, located directly opposite the town centre on Frenchs Forest Road West to create an active and engaging streetscape.
- Non-residential ground floor uses along Frenchs Forest Road West, including medical and health related uses, supporting the Northern Beaches Hospital.
- On Frenchs Forest Road West, close to Wakehurst Parkway, hotels and serviced apartments will support the operation of the Northern Beaches Hospital.
- A pedestrian focused street with no vehicular access from Frenchs Forest Road West to deliver a high quality streetscape on Frenchs Forest Road West.

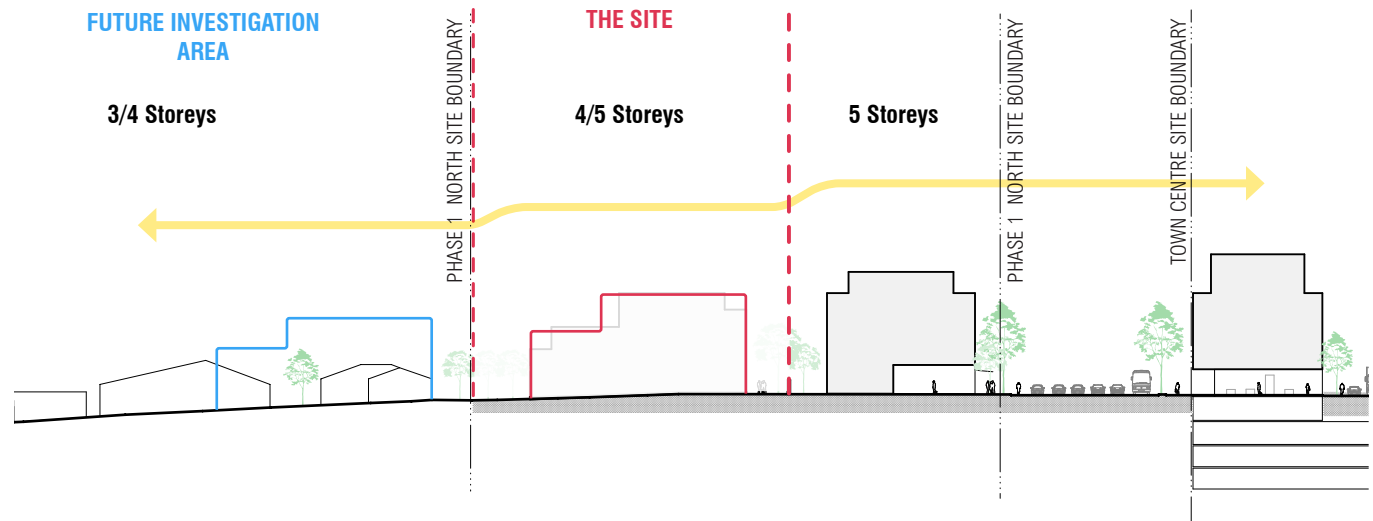


Figure 14: 1.7:1 FSR Built Form Transition Outcome

8.2 Recommended DCP Controls

Amendments to the DCP Controls are shown in [blue](#).

Proposed Draft DCP Amendment	Recommended Amendment
5.2.3 Building Setbacks	
Front Setbacks	
1. A 3.5m setback is to be provided on the northern side of Frenchs Forest Road West. The front setback is to be finished with high quality materials and an active pedestrian frontage across Frenchs Forest Road West. The front setback must not be used for car parking or vehicular access.	No change
2. Development with a frontage to Sylvia Place, Bluegum Crescent and Gladys Avenue must be setback a minimum of 6.5m.	No change
3. Building setbacks from street frontages are to be landscaped and free of any structures, basements, car parking or site facilities other than driveways, letter boxes, garbage storage areas and fences.	No change
Side and rear setbacks	
1. Development with frontage to Frenchs Forest Road West shall have a nil side setback to ensure a continuous frontage to the street.	No change
2. A minimum setback of 15m is required from Wakehurst Parkway	No change
3. Development adjacent to the R2 Low Density Residential and RE1 Public Recreation Zone must provide a minimum setback of 6m from the side or rear property boundary for the first 2 storeys. Development above 2 storeys is to be set back within a 45-degree angle, projected from a height of 2 storeys.	3. All side and rear setbacks are to be consistent with Part 2F of the Apartment Design Guide.
5.2.4 Streetwall and upper floor setbacks	
1. Development fronting Frenchs Forest Road West shall have the fifth floor set back at least 3m from the street wall.	No change
2. Development fronting Frenchs Forest Road West and adjoining the rightof-way accessible off Frenchs Forest Road West (known as Bantry Bay Track) shall have the sixth floor set back at least 3m from the street wall.	No change
3. Developing fronting Gladys Avenue shall have the fourth floor set back at least 3m from the street wall.	No change
4. Despite Requirement 3, any portion of a building within 12m of R2 Low Density Residential zoned land must be no more than 2 storeys.	4. Despite Requirement 3, any portion of a building within 12m of R2 Low Density Residential zoned land must be no more than 2 storeys.
5. Any portion of a building within 12m of RE1 Public Recreation zoned land must be no more than 3 storeys.	

5.2.8 Landscaped Area	
1. For all residential flat building developments, landscaped area is to be at least 45% of the site area.	No change
2. Development must retain and protect any significant trees on the site and adjoining sites. Any tree removal will require offset planting at a ratio of 2 to 1.	No change
3. For new development, the colour selection must reflect the dominant natural colour of the surrounding landscape.	No change
4. Building setbacks are to be landscaped and generally free of any structures, basements, car parking or site facilities other than driveways, letter boxes, garbage storage areas and fences.	No change
5. Communal open space shall be located to minimise impact on adjoining neighbours' amenity including privacy and noise.	No change

8.3 Recommended LEP Controls

Recommended LEP Controls are as follows:

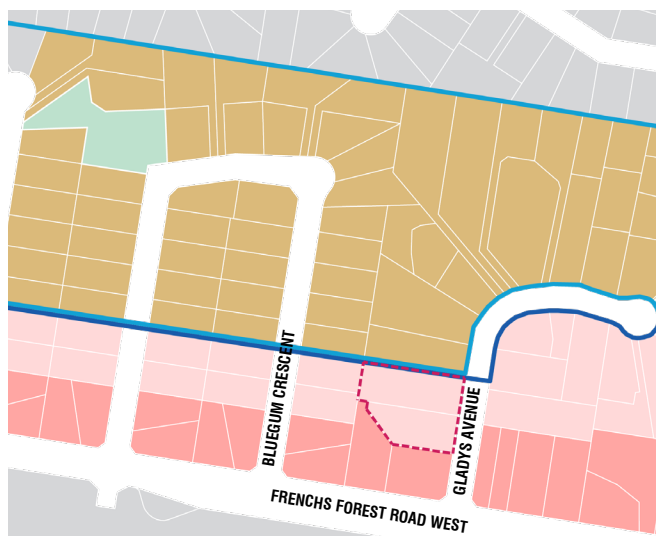
FSR

- 2.0:1 for lots fronting Frenchs Forest Road West
- 1.7:1 for lots in the northern half of the Frenchs Forest Road West Neighbourhood
- 1.0:1+ for lots in the future investigation area to support 3-4 storey buildings

Maximum Building Height

- 17.5m for all lots in the Frenchs Forest West Neighbourhood
- 13m for lots in the future investigation area to support 3-4 storey buildings

Recommended FSR Map

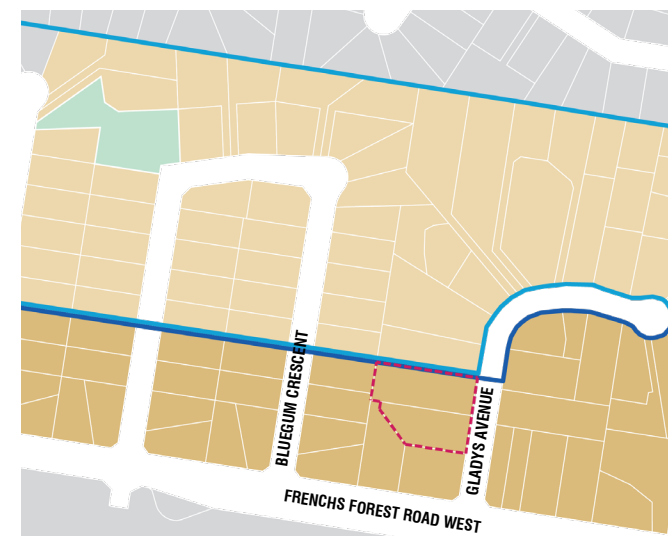


LEGEND

- Subject Site
- Frenchs Forest Precinct
- Future Investigation Area
- 2.0:1
- 1.7:1
- 1.0:1+

Figure 15: Recommended FSR Controls

Recommended Maximum Building Height Map



LEGEND

- Subject Site
- Frenchs Forest Precinct
- Future Investigation Area
- 17.5m
- 13m

Figure 16: Recommended Building Height Controls

9. Conclusion

9.1 Summary

The 2041 Place Strategy proposes an FSR of 1.0:1 for the site and adjoining lots in the northern half of the Frenchs Forest Road West Neighbourhood. The rationale behind this FSR is to ensure built forms provide an appropriate transition to the existing low density residential areas north of the precinct.

As discussed in **Section 5.2**, the desired future character of Gladys Avenue and Bluegum Crescent is for medium density development. Accordingly, the proposed development controls for lots in the northern half of the Frenchs Forest Road West Neighbourhood should take into consideration this desired future character and impending uplift of properties to the north.

As demonstrated in **Section 6.1** an FSR of 1.0:1 only allows for a part two and part three storey built form. This will not provide an appropriate built form transition from the five storey developments fronting Frenchs Forest Road West or to the anticipated three to four storey developments to the north.

Further, the 1.0:1 FSR is not consistent with the 2017 Northern Beaches Hospital Structure Plan which proposed an FSR of 1.7:1 to development was feasible in the immediate to short term.

Instead, as demonstrated in **Section 6.2 and 6.3**, an FSR of 1.7:1 allows for five storey built form. This will ensure development is feasible and provides an appropriate transition to the anticipated three to four storey buildings in the future investigation area.

9.2 Recommendations

The following recommendations should be addressed in the final Frenchs Forest Place Strategy 2041 and Warringah DCP 2011 - Part G9 Frenchs Forest Town Centre.

1. Consideration of the Future Investigation Area

The Frenchs Forest Place Strategy 2041 should carefully consider future growth of the Town Centre, particularly to the north.

2. Revised Desired Future Character and DCP controls

The Desired Future Character and DCP controls for the Frenchs Forest Road West Neighbourhood should be revised to reflect the anticipated uplift of the future investigation area to medium density developments.

3. Proposed LEP Development Controls

The proposed FSR and maximum building height of the site and adjoining lots in the northern half of the Frenchs Forest Road West Neighbourhood should be increased to 1.7:1 and 17.5m respectively, to support four to five storey residential flat buildings.

4. No Further Restriction of Existing Controls

Any proposed amendments to controls should not restrict development further than what is permissible under existing controls.

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3rd September 2021

Mr Brett Whitworth
Deputy Secretary – Infrastructure and Place
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

On-line submission

Dear Mr Whitworth

Re: draft Frenchs Forest Place Strategy

I write regarding *draft Frenchs Forest Place Strategy* (Draft Strategy) and the accompanying Explanation of Intended Effects prepared by the Department of Planning, Industry and Environment (the Department).

The Urban Taskforce has supported State-led rezoning processes to allow for a co-ordinated response to delivering precinct plans and as an opportunity to meet Greater Sydney Commission (GSC) job and housing targets. The State-led precinct planning process presents an opportunity for the Government to lead the delivery of new homes in all LGAs for medium to longer term housing supply. When governments fail to plan for the new houses needed by future generations this will further drive up the price of, and capacity to pay for, housing.

Urban Taskforce is concerned about the feasibility of the draft Strategy particularly with respect to the combined cost impost of the proposed affordable housing contributions and the proposed accompanying Special Infrastructure Contribution (SIC). The combined impact of these two costs, together with local charges is highlighted in the accompanying report prepared for DPIE by AEC Group.

The Urban Taskforce has made a separate submission to the proposed SIC.

If development under the Strategy isn't feasible then the supply of much needed new homes will be further constrained.

The prospect of the new homes planned for French Forest not being delivered needs to be considered in the context of the draft Ingleside Strategy and the Northern Beaches Local Housing Strategy (LHS). The revised Draft Ingleside Strategy included a significant reduction to new dwellings (980 down from 2,400). While the draft LHS, as endorsed by Northern Beaches Council, proposes very limited opportunities for feasible and market responsive long-term housing supply and choice.

The increased likelihood of insufficient housing supply and diversity across the Northern Beaches will further impact on the affordability of housing in the LGA.

The Northern Beaches area is experiencing some of the most significant increases to housing prices across all of Greater Sydney. This relates to both median rents¹ and property prices², with some suburbs increasing by more than 30% over a 12 month period.

Put simply, more housing supply is needed across the Northern Beaches to drive the cost of housing down.

The draft Place Strategy when viewed alongside the draft Northern Beaches LHS and draft Ingleside Strategy raises serious concerns about the broader area's capacity to deliver medium to longer term housing supply.

In the interest of housing affordability and diversity it is imperative that the LGA is still capable of generating new housing supply and housing choice as set out in the GSC's assurance of the Northern Beaches Local Strategic Planning Statement.

The costs proposed to be added to the production of new homes at Frenchs Forest together with the scale of development permissible under the proposed planning provisions are unlikely to deliver much needed new housing and ensure the meeting of GSC mandated housing targets.

The following relates to the proposed planning provisions under the draft Place Strategy.

Affordable Housing Contributions

The NSW Productivity Commission has found that:

*"Local contributions should be used to fund development-contingent costs; that is costs that would be avoided if a development did not go ahead. Affordable housing does not fall within this definition... The limited uptake of affordable housing schemes by councils suggests the contributions system plays a minor role in affordable housing supply. Moreover, it is not clear that housing is being made more affordable as a result of these schemes, as some stakeholders noted: the creation of a small quantity of "affordable housing", may be at the cost of making other housing more expensive."*³

Affordable housing is best addressed by more approvals and faster re-zonings of land to boost supply, not the application of affordable housing levies.

Affordable housing contributions impact the ability of the planning system to increase housing supply in general. Any additional contribution affects project feasibility which

¹ Razaghi T, July 10 2021, 'Where Sydney rents are getting more expensive and where they're getting cheaper', <https://www.domain.com.au/news/the-sydney-suburbs-renters-have-turned-to-in-droves-driving-up-asking-rents-1070762/> accessed 31st August 2021

² Burke, K, July 31 2021, 'https://www.domain.com.au/news/the-sydney-suburbs-with-the-steepest-house-price-hikes-and-falls-1075641/', <https://www.domain.com.au/news/the-sydney-suburbs-with-the-steepest-house-price-hikes-and-falls-1075641/> accessed 31st August 2021

³ NSW Productivity Commission, Review of Infrastructure Contributions in NSW, November 2020

leads to an impact on supply when projects do not go ahead. Affordable housing contributions actually push up the price of new homes as the price of 'market' homes is increased to off-set the cost of the affordable housing.

The best way to make housing more affordable is not to slap a tax on new home buyers.

Urban Taskforce recommends that the proposed 10-15% affordable contribution not proceed and instead development controls across the precinct are reviewed with a view to contributing to housing supply and the meeting of GSC targets.

Design Excellence

Urban Taskforce notes that a design excellence process will be applied to all development that is three storeys or higher including review by the Northern Beaches Council Design Review and Sustainability Advisory Panel without any development incentives.

The Urban Taskforce supports an outcome of good design, but design excellence reviews add an additional process to the already slow NSW planning system. Additional processes adds time and cost to the delivery of new homes and jobs. The design excellence process being added to medium density buildings in the absence of incentives will add to the cost of new homes, or worse, threaten the delivery of the new development needed to deliver the Government's vision for the precinct.

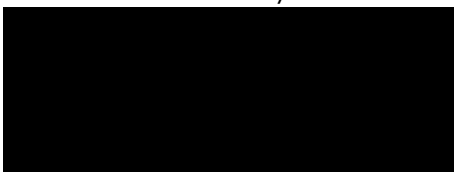
Regulation and process undermines the market and adds to cost. These are the clear lessons from the NSW Productivity Commission's reviews. This is particularly relevant in the context of NSW' post COVID-19 economic recovery.

In the interests of development being feasible and ensuring the Government's vision for Frenchs Forest can be delivered, **Urban Taskforce recommends** design excellence provisions are supported by development incentives and are removed for buildings with a building height of less than 20m.

Table 1 includes a summary of all Urban Taskforce recommendations

The Urban Taskforce is always willing to work closely with the Government to provide a development industry perspective on proposed policy and planning changes.

Yours sincerely



Tom Forrest

Chief Executive Officer

Table 1:
Summary of Urban Taskforce recommendations

	Urban Taskforce recommendation
1.	<p>Affordable housing contributions actually push up the price of new homes as the price of 'market' homes is increased to off-set the cost of the affordable housing.</p> <p>The best way to make housing more affordable is to increase housing supply to drive down the cost of new homes.</p> <p>Urban Taskforce recommends that the proposed 10-15% affordable contribution <u>not</u> proceed and instead development controls across the precinct are reviewed with a view to contributing to housing supply and the meeting of GSC targets.</p>
2.	<p>Regulation and process undermines the market and adds to cost. These are the clear lessons from the NSW Productivity Commission's reviews. This is particularly relevant in the context of NSW' post COVID-19 economic recovery.</p> <p>In the interests of development being feasible and ensuring the Government's vision for Frenchs Forest can be delivered, Urban Taskforce recommends design excellence provisions are supported by development incentives and are removed for buildings with a building height of less than 20m.</p>

I strongly object to the Frenchs Forest development proposal.

The reasons for my objection are listed below.

One of the worst town centres in Sydney

Compare the proposal to St Leonards. Both have a major hospital.

In addition, St Leonards has:

- Close to the CBD, North Sydney, Chatswood
- A train station plus a metro station being built
- Buses from Epping, Lane Cove, Chatswood, Manly, North Sydney, the CBD running past all the time
- A major road running north – Pacific Highway
- Close to another major artery – Warringah Freeway plus arterial roads to the Northern Beaches
- Crows Nest business centre, which relies on its vibrancy in part from being connected to North Sydney business centre
- Artarmon business centre including shopping and industrial businesses.
- Well established shops and businesses along Pacific Highway
- Cafes and restaurants which can survive because they have a large number of office workers during the day and social groups during the night
- A major sports ground next door
- Bushland in the form of the cemetery
- Close to a number of major high schools and TAFEs
- Supermarkets, other stores

By comparison, Frenchs Forest has:

- Warringah Freeway, the second most congested road in Australia
- Connecting roads to elsewhere in the Northern Beaches
- A few minor businesses
- A residential area
- Garigal National park and Manly Dam nearby

Frenchs Forest lacks location, nearby attractions (apart from natural attractions) and transport. It cannot become a major business hub. It cannot become an important town centre. It cannot become a good high rise residential district. It will just become a dump: a place for people who lack the money to live close to where they work and who don't mind living in an area without attractions and are willing to put up with bad transport.

Parking

Frenchs Forest is entirely dependent on road transport. It has one of the highest rates of car ownership in Sydney. There are few options besides car to get around.

The proposal is to build 5000 new residences. This will lead to around 10,000 new cars on the road which will all require parking.

The proposal is to create 2000 new jobs. This will lead to a demand for around 2000 new car parking spaces.

The proposal is to create a new town centre. This will lead to a demand for 500-1000 new car parking spaces.

In total, the project will require around 12,500 new car parking spaces.

The main roads through the proposed development all do not allow parking. Warringah Rd has no parking. Frenchs Forest Rd has no parking. Forest Way has no parking. Wakehurst Parkway has no parking.

The small roads near the development already have parking problems due to high parking demands from the Northern Beaches Hospital. Residents in these streets have already pushed to reduce parking because the roads become too congested to drive along.

Where is all the parking going to go? This does not seem to be factored into the development. It is going to create a parking and transport logistics nightmare.

Traffic problems

Frenchs Forest relies 100% on road transport. Warringah Road is its major connection to places outside the Northern Beaches. This is the second most congested road in Australia with the section near Frenchs Forest one of the major places of congestion.

Getting onto Warringah Rd from the proposed development area is slow because roads are congested and traffic lights are slow to change due to the extreme width of the roads at intersections.

The proposal will bring 10,000 additional vehicles to this area. It will make traffic much worse than now, creating terrible congestion and traffic jams.

It will be bad not only for people living in Frenchs Forest but for everyone who has to pass by it. It will only make the traffic situation in the Northern Beaches much worse.

Walking is dreaming

The proposal thinks that it will create a wonderful environment for walking around in. However, walking around that area is already bad enough as it is already. Very few people walk along Frenchs Forest Rd West and Naree St. That is because this road is east-west and the sun always shines in your face. The footpath is completely cement. It reflects light at you and is hot and dry. The road is steep. You go down a long way to Rabett St and a long way up again on either side. There are no trees to shade you and there is a constant stream of traffic beside you. Even in lockdown when people are walking all over the place, no one wants to walk along that road. It is simply unpleasant.

After the development, it will only get worse. The street will be wider. There will be fewer trees. There will be less to see except for highrise buildings looking down on you. People who enjoy walking will not want to walk around there. Anyone who thinks otherwise is dreaming.

No new jobs

The proposal says the development will create 2000 new jobs in the business park. If this is true, then why does the NSW Government not believe this?

Already the government has started allowing the business park to be rezoned as residential. A new large development called Jardin is currently being developed on business park land on Frenchs Forest Rd East.

If we are about to experience a massive growth in jobs in this same area, why is the land being rezoned to residential?

More realistically, there is going to be no growth in jobs in the area. Instead there will be a reduction in jobs as the business park is slowly closed and turned into more profitable residential development. Frenchs Forest is not going to be a business centre but a sleeper town where workers for elsewhere in Sydney spend the night.

It will be the place where low paid workers live in highrise and from where they commute out the area each day to jobs elsewhere in the city. As a sleeper town, it is extremely poorly located. Transport connections are terrible and it is accessible only by car. It will not lead to a good environment.

Does housing lead to jobs?

The proposal says that 5000 new residences will be built and this will generate 2000 new jobs. However, there is no connection between the two.

The new residents will not be the people working any new jobs. The way the job market works is that positions are given to people with the right skills and wage expectations. Where they live is immaterial. The chances that a new resident will be the best person for any local job is vanishingly small, so they will not be the new workers.

The idea that the new residents will have needs that are supplied locally will mean only that there will be supermarkets and food stores that meet the daily needs of locals. However, there are already two supermarkets in this area and many food stores. According to the plan, the current supermarkets will be closed and relocated to the new area. This will not lead to an explosion of new jobs but just to larger supermarkets which will meet customer needs with more products rather than more staff.

Locals will not shop for other things in the region unless they are competitively priced vs Chatswood and other areas and the likelihood of this is very low since the area has a significant transport disadvantage that will limit customers. It is not possible for this area to develop into a major shopping hub. It will be a high density residential area with a few shops.

Impact on waterways

The proposal is to develop 35 hectares of land at the top of a ridge that is the start of streams that flow into four separate water catchment basins.

The four water catchment basins are:

- Manly Dam/Manly Lagoon
- Bantry Bay
- Narrabeen Lagoon
- Middle Harbour Creek/ Carroll Creek

The area involved stretches from Davidson to Narrabeen to Seaforth and Manly. It these water catchment basins cover an area probably larger than half of the lower Northern Beaches. This is a very significant amount of the whole of the Northern Beaches.

For such a large area that will be affected by this proposal, there should be a thorough environmental study of the impact of development upon water resources. If such a study has been done, it should be made available to the public.

Flooding

Road widening, high density urbanization with buildings up to 41 metres high, paved shopping centres and bush reduction will all contribute to a significant drop in the ability of the area to absorb water.

When heavy rains fall, it will lead to increased flooding in all the catchment areas. The NSW Government has identified flooding along Wakehurst Parkway to be a serious issue that affects road users. The Government has been unable to find a solution to the problem. All plans recently submitted have not solved the problem but only reduced the number of days that it will occur on.

The development at Frenchs Forest will only make flooding along Wakehurst Parkway more extreme as any rainfall along the top of the ridge where the development will go will flow down the hill much more quickly. This will lead to more days of flooding and greater intensity of flooding.

The proposed town centre, surrounded by 41 metre high buildings will be built right on top of the stream that flows through Rabett Reserve, over Oxford Falls and into Narrabeen Lagoon. The almost total removal of tall trees with their deep roots, of parkland associated with Forest High and of the gardens that are part of the current low density urbanization will mean that water will be immediately disgorged into the stream. It will cause more flooding downstream, higher water velocity, associated with greater scouring of river banks and more garbage and pollutants flowing into water ways.

Drought and bush fire

High density urbanization on this steep ridge means that rainwater runs off much faster. This leads to flooding. It also leads to much drier conditions.

Currently, water is absorbed into the ground and slowly released into creeks and underground streams. This keeps the bushland in the area well watered. Reducing this water supply will affect bushland in Garigal National Park, Manly Dam Reserve, the Narrabeen Lagoon area, parkland and reserves as well as gardens and nature strips in the area.

All this will contribute to drier and hotter conditions in the area. This will cause some changes in plant distribution as more drought tolerant eucalypts will push into current rainforest areas which will also impact on wildlife diversity.

It will also lead to increased bushfire hazard due to drier conditions, higher temperatures and less non-flammable rainforest bush relative to eucalypts.

Heat trap

The Frenchs Forest area already has a number of massive roads. The heat from these roads is partially offset by tall trees, bushland and grassland. Removal of the tall trees, clearing of the bushland and replacement of grassland by paving will cause this area to be insufferably hot.

The proposed development area has four major roads through it:

- Warringah Rd up to 10 lanes wide
- Naree Rd/Frenchs Forest Rd East/West up to 6 lanes wide
- Forest Way up to 8 lanes wide
- Wakehurst Parkway up to 7 lanes wide

The development proposes additional road widening in addition to high density urbanization with buildings up to 41 metres high, paved shopping areas etc. It will turn this area into 35 hectares of mainly cement and roofing, creating an enormous heat trap that, since it is on the top of the ridge, will be exposed to sunlight throughout the day.

During the night, lights from tall apartment buildings will shine across the suburb and bushland. Heat pollution during the day, light pollution during the night, plastic and chemical pollution flowing into streams during the rain; the proposal is not for an environmentally friendly project.

Destruction of bushland

The plan calls for the destruction of original bushland Frenchs Forest Rd East, Wakehurst Parkway and Warringah Rd. This is valuable bushland. It protects the start of Trefoil Creek and other water ways. The tall trees keep the land moist and cool. The bushland is a wildlife corridor that connects Narrabeen Lagoon to Manly Dam.

This bushland should be saved for future generations, not used up by the current generation just to create a few construction jobs for a couple of years.

Destruction of what is best about Frenchs Forest and the Northern Beaches

The Northern Beaches lacks jobs, shopping, nightlife etc. What it offers is a great laid back lifestyle in a natural environment with lots of bushland and clean beaches.

This project will partially destroy those good things. It will damage the bushland, cause greater pollution to enter our waterways, cause heat and light pollution. It will get rid of bushland, parkland and gardens and replace it with high density accommodation.

It will not deliver jobs, shopping or nightlife. It will not bring the good things the Northern Beaches lack but will destroy the good things it has.

For this reason, I strongly oppose this development.

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 3:50:45 PM

Submitted on Fri, 03/09/2021 - 15:50

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Karl

Last name

Tuynman

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Frenchs Forest

Submission

Hi,

I live in 15 Gladys Ave which is part of the proposed rezoning area of the draft plan.

I note that the FSR has changed from the original proposal in 2014 of 27ms down to 13ms in the current proposal.

To be honest, I am a bit confused as to why this has occurred? I have been told the main reason is to ease the interface of development with neighbours.

As you would be aware, our properties entire front boundary is on the reserve boundary, so we have no houses around us. To one side of our property is 13 Gladys Ave, which also has its front boundary on the reserve boundary, and to the other, there is about a 30ft stretch of council land dividing us and the house next to us.

Behind our property is the area which is part of the rezoning area.

With this in mind, I would say that high rise buildings of 27ms or thereabouts, would not have any detrimental effect on the surrounding houses, as there is none that would be effected.

I feel the relationship of the new buildings at a height of 27ms, and the reserve will be quite harmonious, and will ensure that adequate housing is provided for those that need it, as to make the height lower, will create a shortfall of opportunities.

I would ask, that as a responsible council to the community, you consider reinstating the 2014 FSR of 27ms so such an enjoyable aspect that we currently live in does not go to waste due to a reduction in people that will be able to enjoy it.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 3:56:33 PM

Submitted on Fri, 03/09/2021 - 15:56

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Peter

Last name

Byles

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Frenchs Forest

Submission

Thank you for considering my thoughts upon the Frenchs Forest precinct plans.

Firstly, we do live in very fortunate circumstances. This should not negate fair dealing in our life decisions - and the opportunity to make such large familial decisions in a timely manner.

Developers will always have funds to invest - some at the announcement offered \$25,000 deposits per year for a fixed price at the end of 2 years. It seems they did not want to "park" the offer for at least the ten years it has taken since for Phase 1 to be confirmed in this tediously slow process.

My mother is now in full time care. I as her eldest son was a full-time carer for her and her second husband, a WW2 Veteran, until their care needed a hospice. My mother has survived her husband and is now not considered a 'war widow' and has a part pension while her home, where I live, is being assessed as an Asset! Recently the Medicare Cards for them both arrived in the mail – even though he is 2 years Dead!

My younger brother is an Assistant Director of Nursing at a major Sydney Hospital. In my case I am since youth a Diabetic reliant on synthetic Insulin for life - let alone keeping retinopathy and other conditions 'at bay'. I was a protected person and have not paid rent or pursued rental assistance from Centrelink over these years of care.

The High School that provided me and my peers a marvellous music education - 6 of us studied at the Conservatorium (note Conservatorium is only used to describe a musical institution in Sydney, Australia).

I have grown up, lived, been a local High School Student – in Music, 6 of our year went to the Conservatorium of Music – 5 of us are teaching music to children and 1 is the Director of the NSW Police Musicians. The Forest is an important School – not just music, life saving and many individual and teams sport athletes. I sincerely hope the new school site is not full of lead and other contaminants left from when the 'tip' was there. Certainly I hope that studies have been conducted so that Manly Dam is not in danger of contamination through leakage of metals.

It is the 3rd of September, 3:48pm – and so all I can really ask is that Phase 2 be promoted. Every time I see a photo of the new Forest Precinct all I SEE IS MY MOTHERS HOME, #13 ON THE CORNER OF THE CURRENT UPPER (sorry for the CAPS but I am typing as quickly as I can before close of business.

Please let us make a decent deal to sell – the position is as good as anyone could dream of for a young family, but if the Phase 2 properties are to be fairly disposed of... Developers and not families seeking to move to an area with great schools and walking distance to all their needs -should pay up to move us from what you surely understand is "GOD's Own"

Peter Byles

13 Holland Crescent

Frenchs Forest NSW 2086

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 3:57:49 PM

Submitted on Fri, 03/09/2021 - 15:57

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Frenchs Forest

Submission

[REDACTED]

03 September 2021

RE Draft Frenchs Forest Place Strategy

The Submissions Officer
Northern Beaches Precinct Plan

We are surprised and disappointment at the amended controls released for the Draft Frenchs Forest Place Strategy and in particular those in relation to Gladys Ave. This plan has changed significantly from the original plan submitted by the Northern Beaches Council.

The streets surrounding the hospital have always been identified for new housing and employment to address demand and support for the hospital over a 20-year period. There has been such a dramatic change to what was initially exhibited, it appears this thinking has been abandoned.

With the new Draft Frenchs Forest Place Strategy, the likely hood that it will attract development is low, yet State Planning is expecting this area and in particular our street to be developed. This doesn't make sense when the purpose of the plan was to encourage development in the surrounding streets, providing support to the new Hospital and Town Centre.

To deliver on the promised plan and to encourage interest from landowners and developers to build a viable product, we would like to have the following controls reviewed:

FSR: increase 2.5

- An FSR of 1.0 (previously 2.2) does not make building or development sense, especially when taking into consideration offset and greenspaces.

Height: increase it back to 18-22 metres

- Dropping the height to 13 metres, coupled with an FSR of 1 does not make building or development sense, especially when taking into consideration gradients back from the hospital site.

Affordable Housing: reduce to 3%

- There is no precedent for 10% or the original 15%. This goal is in place to benefit Council and meet their obligations. A more realistic figure in this area would be 3% to 5% in these lower density outlining streets where height and FSR have been cut so dramatically.

After discussions with Developers we know they will not build based on the new plan and the revised FSR and height. The recent amendments will not allow State Planning to deliver on the vision of the surrounding streets supporting the new Town Centre.

We do not see how the Draft Frenchs Forest Place Strategy will contribute to the expected outcomes for the Precinct and hope that submissions like ours will assist in amending the Strategy so it is able to deliver on the original vision of the precinct.

Regards

[REDACTED]

I agree to the above statement

Yes

Holland Crescent should be included in Phase 1 of the development for the new town centre and should also have **higher height controls and increased floor space ratios** the following reasons:

1. Holland Crescent lies between the existing Frenchs Forest town centre and the new development hence **providing connectivity between the two sites**.
2. Holland Crescent provides a **secondary entry to the new town centre** (as noted in the draft plans) allowing another access point for construction vehicles and workmen. This needs to be made available during the Phase 1 construction period.
3. By including Holland Crescent in Phase 1 of the project and allowing it to be an access point would therefore keep heavy vehicles and increased traffic away from the hospital and other residential areas during Phase 1 construction period. An **important safety consideration** that I believe needs to be considered.
4. As Holland Crescent lies in a gully between the new town centre and Forestway, it is important that **higher height controls and increased floor space ratios** be considered for all the dwellings in Holland Crescent. The location of Holland Crescent is also suited for transit oriented development which supports this higher density consideration.

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 4:04:03 PM

Submitted on Fri, 03/09/2021 - 16:03

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Victoria

Last name

Heaton

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Dee Why 2099

Submission

I strongly object to the proposal to develop the Frenchs Forest precinct.

The development is simply too large and out of character for the area. It will destroy bushland and have an impact on waterways leading into Manly Dam and Narabeen Lagoon. It will make flooding worse than it is now.

There should be an environmental impact statement for the project so that we can see what effect the project will have on the environment.

As for traffic, it will only get worse with so many new apartments being built. Roads cannot cope with all the traffic now, let alone with thousands of new cars on the road. It will be a nightmare to drive past Frenchs Forest in the future.

Where on earth are all the people going to park? The Northern Beaches is congested enough as it is now, wait till all those new people arrive.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 4:04:59 PM

Submitted on Fri, 03/09/2021 - 16:04

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Frenchs Forest, 2086

Submission

I strongly object to this project.

I am involved in restoring and protecting the environment in the Northern Beaches, such as at Manly Dam and feel very strongly about preserving the natural bush here so that people, animals and plants can enjoy it and live in harmony with each other.

The Frenchs Forest development will upset that balance by turning this nice suburb into an urban high rise. It sits right above Manly Dam so whatever happens there will affect Manly Dam as well as Manly Creek and Manly Lagoon, all the way to Queenscliff on the ocean.

More buildings and roads will lead to faster runoff of rainwater and causing flooding everywhere downhill of there. That means more silt in streams and more gouging of stream beds. It will be a disaster for the delicate environment.

Rain will not soak into the ground so it will dry out streams and the bush will dry out as well. It will make the bush around Frenchs Forest more prone to bush fires. This will be bad not only for people and their property but also for rare animals and plants. With dry land and more fires, water loving species that hate fire will die out and the bush will change its character.

All the new cars on the road too will make things bad for people and animals. Too much light at night from cars and high buildings is bad for nocturnal animals. Bad for people too because of traffic jams and slow travel around.

Please do not let this project go ahead.

I agree to the above statement

Yes

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 4:46:20 PM

Submitted on Fri, 03/09/2021 - 16:46

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Stefanie

Last name

Matosevic

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

2000

Submission

See pdf attached

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 4:47:05 PM

Submitted on Fri, 03/09/2021 - 16:46

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Judy

Last name

Coffee

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

FRENCHS FOREST

Submission

Hi there,

I'm concerned that the increase in the housing density will impact local traffic which (before COVID19) was already very heavy. Our small local street has become a dangerous rat run. And I'm concerned the impact of an increase in hard surface run-off will have on the local environment. And the effect of the increased population will have on the nearby parklands. We continue to increase human habitation and decrease green space - which up until now has been a key feature of the suburb. There are limited facilities for children, and I do not see adequate provision for more playing fields and parks.

Everyone I speak to is very concerned about this plan. I heard very little support for it. This development is not consistent with the suburb that we chose to live in 25 years ago and so when the development starts we'll elect to sell and move elsewhere. I don't think this is a good vision for the suburb. What's being proposed is not a suburb that I would choose to live in.

I agree to the above statement

Yes

Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124

1st September 2021

To whom it may concern,

RE: Draft Frenchs Forest 2041 Place Strategy

Thank you for the opportunity to comment on the draft Frenchs Forest Place Strategy. Bicycle NSW has been the peak bicycle advocacy group now in NSW for over forty-five years, and has over 30 affiliated local Bicycle User Groups.

Our mission is to make cycling better for everyone in NSW, and we support improvements to the pedestrian environment and advocate for new cycling routes that incorporate dedicated paths within the road environment and in green corridors, providing connections to jobs, schools and services for daily transport and recreation trips. Cycling provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

Frenchs Forest 2041 covers the Phase 1 area of Northern Beaches Council's Hospital Precinct Structure Plan which sets out a three-phase delivery of approximately 5,360 dwellingsⁱ and 2,300 new jobs over the next 20 years. The Place Strategy has a vision for Frenchs Forest *"as an urban forest, with green streets and new open space.... (The precinct) will provide character and great places; it will foster healthy and connected communities, attract families and encourage new business. It will set the benchmark for health and wellness, liveability and prosperity in a new urban centre"*ⁱⁱ. The 5 Big Moves aspire to create **an attractive new town centre that will be an asset to the Northern Beaches** (Figure 1) and Bicycle NSW is excited by DPIE's ambitions for the precinct.



Figure 1: The proposed masterplan for the Phase 1 town centre (Source: Architectus/Chrofi)

However, it is disappointing that Frenchs Forest 2041 and the associated amendments to the Warringah Development Control Plan 2011 (DCP) contain **very limited proposals for the development of cycling facilities**. This submission addresses these shortcomings and make recommendations for the final Place Strategy and DCP.

We have reviewed the draft Frenchs Forest Place Strategy alongside other relevant plans that relate to the Frenchs Forest area to identify the possible opportunities for improving the active transport network. These plans include:

Transport for NSW Future Transport 2056 Planⁱⁱⁱ, which commits to providing a regional cycle network in Greater Sydney, known as the Principal Bicycle Network (PBN). A coordinated delivery of bike lanes across Greater Sydney will ensure that routes across council boundaries align and create the most direct path of travel. Separated bicycle paths along Wakehurst Parkway and Warringah Road will form key regional routes that serve the Frenchs Forest Precinct.

Greater Sydney Region Plan, A Metropolis of Three Cities (2018)^{iv} which contains 10 directions to create a city where all residents live within 30 minutes of a metropolitan or strategic centre. Increased liveability will be delivered by focusing on walkability, with a network of green corridors for active transport. The plan locates the Northern Beaches in the Eastern Harbour City and identifies Frenchs Forest as a Health and Education Precinct.

North District Plan (2018)^v set outs how integrated land use and transport planning can help achieve the 30-minute city through increasing development density near public transit corridors in Planning Priorities N1 and N12. The need for better accessibility, connectivity and amenity for pedestrian and cyclists is also emphasised in Planning Priorities N3, N4, N19 and N21. In addition to the Health and Education Precinct at Frenchs Forest, strategic centres are identified at Manly, Brookvale, Dee Why and Mona Vale.

Sydney Green Grid^{vi}, developed by the NSW Government Architect in 2017 and reflected in the district and region plans, proposes an interconnecting network of open spaces that support walking and cycling. The Principal Bicycle Network will integrate the Sydney Green Grid to create important links between activity centres and support active recreation. The Frenchs Forest area is covered by the North District documents which highlight key Green Grid opportunities to link Manly Dam to the Frenchs Forest Precinct making use of the Pipeline easement and to develop active transport corridors along Wakehurst Parkway and Warringah Road (Figure 2).



Figure 2: Extract from the Green Grid showing project opportunities in the Frenchs Forest area
(Source: Tyrrell Studio / NSW Government Architect)

Shape 2028 - Northern Beaches Community Strategic Plan^{vii}, establishes the vision and principles to guide Northern Beaches Council to 2028. Community consultation identified 8 key outcomes and 24 related goals that are important to the community and underpin future work. In Goal 17b, under *Transport, Infrastructure and Connectivity*, Council promises to focus on facilitating active and sustainable travel, while ensuring ongoing maintenance and improvements of footpaths and other infrastructure.

Towards 2040 - Northern Beaches Local Strategic Planning Statement^{viii} guides land use planning and the delivery of significant infrastructure for the Northern Beaches to 2040. The LSPS identifies 9 directions and 30 priorities to support the long-term vision of “a stunning coastal and bushland environment, with an enriched and contemporary coastal character and better connections to the North District and the rest of Greater Sydney”.

- Priority 12 seeks an inclusive, healthy, safe and socially connected community, with walkable neighbourhoods to support active living.
- Priority 20 promises sustainable local transport networks so that residents will have the choice to live without a car anywhere in the LGA in 2040. Safe cycling routes separated from vehicle traffic within 5 km of strategic centres will be prioritised.
- Priority 21 aims to redesign existing streets to be more efficient, accommodating more people, goods and services in a limited space and creating safer and more attractive public realm. The reallocation of road space to create wider sidewalks, dedicated bus lanes or separated cycleways will reduce conflict and make it easier to walk, cycle or use public transport.
- Priority 23 plans for Frenchs Forest to be a sustainable health and education precinct with a walkable town centre and connections to the broader active and public transport network, including regional cycling routes to Chatswood and Spit Bridge.

Move 2038 - Northern Beaches Transport Strategy^{ix} discusses the challenges and opportunities for transport in the Northern Beaches over the next 20 years. The strategy imagines a future where cars no longer dominate the roads, with walking and cycling becoming the first choice for trips under 8km. A rapid bus service from Dee Why to Chatswood is the public transport priority. *Theme 1: Accessible and Liveable Places* and *Theme 2: Active Travel* outline plans for smart, active travel network improvements (through technology, end of trip facilities and way-finding signage) and expanded footpath and shared path networks to improve connectivity and safety. The completion of missing links is essential and it is recognised that pedestrians and cyclists should be separated. The aim is to double the active travel trips and drive a 30% reduction in journeys by cars. An ambitious target is set to reduce travel to work by car from 59% of trips in 2016 to just 35% by 2036 while walking and cycling commutes will increase from under 5% to 15% (Figure 3).

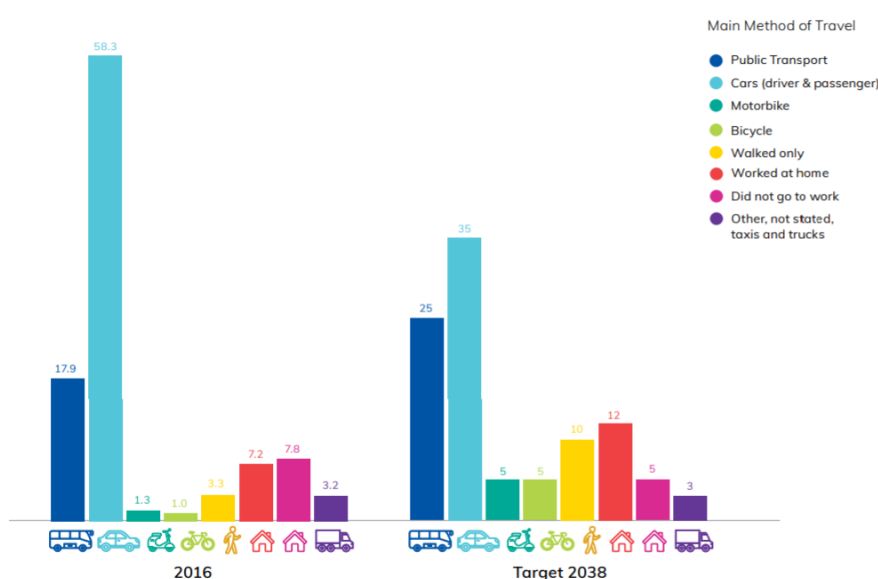


Figure 3: Journeys to work in 2016 and 2036
(Source: Northern Beaches Council)

Northern Beaches Bike Plan 2020* sets out the directions and actions required to help the community choose cycling as a transport option, create a safer cycling environment and meet the targets established in Move 2038. Cycling is already popular on the Northern Beaches - 40% of residents used a bicycle in the past 12 months compared to the state average of 25% - and the Council is committed to growing cycling.

The Bike Plan proposes separate networks for safe transport cycling and road cycling, end-of-trip facilities and the promotion of cycling. The need for separated cycleways or extra-wide shared paths on regional and district routes and in high use areas is recognised, as is the prioritization of cycleways over driveways and minor road intersections

The proposed Safe Cycling Network includes a three-tier route hierarchy that matches the TfNSW cycling network hierarchy and aligns with the Principle Bicycle Network routes. The three levels consist of regional, district and local routes. The routes around the Frenchs Forest Precinct are shown in Figure 4. The Tier 1 separated path along Warringah Road and the Tier 2 shared path on French Forest Road West are completed.

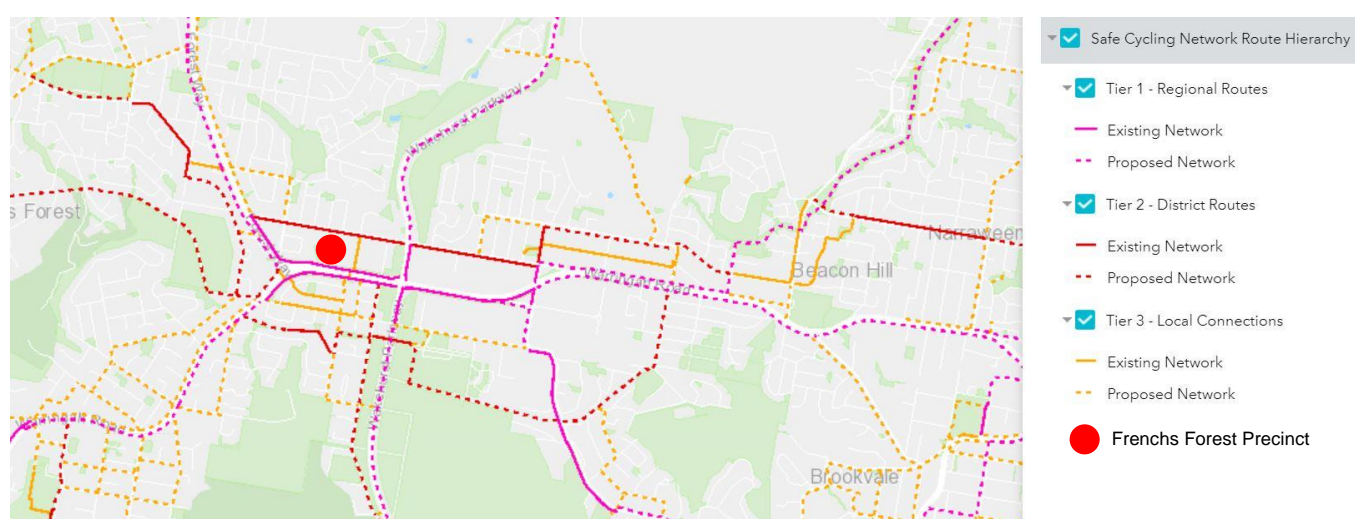


Figure 4: Extract from the Safe Cycling Network showing routes in the Frenchs Forest area
(Source: Northern Beaches Council)

Concerns:

Frenchs Forest 2041 does not align with the excellent ambitions for walking and cycling set out in the recent plans and strategies developed by Northern Beaches Council.

The draft Place Strategy recognises that a 'large' shift from private car use to active and public transport is essential for future sustainability with increase in residents and promises "active links through the precinct and to local open space, bushland areas and national parks, providing convenient pedestrian and cycle connections across major roads into the town centre". However, there are no targets in the strategy for the modal share for active travel and no information about how the network of cycling and walking paths will be incorporated into the precinct.

The associated DCP prepared by Northern Beaches Council to support the Place Strategy was informed by an Urban Design Report^{xi} which identifies obstacles to active transport in area. Frenchs Forest has developed as a car-based suburb with large blocks, neighbourhoods disconnected by major arterial roads and limited walkability. The recent hospital development has created further barriers - a substantial 8-level

car park building separates the hospital entrance from the proposed town centre and Warringah Road was widened to form a 10-lane road with freeway characteristics.

The urban designers deftly negotiate these planning errors to propose fine-grain and permeable streets that support walkability within the precinct and to key local destinations establishes the hierarchy of streets shown in Figure 5.

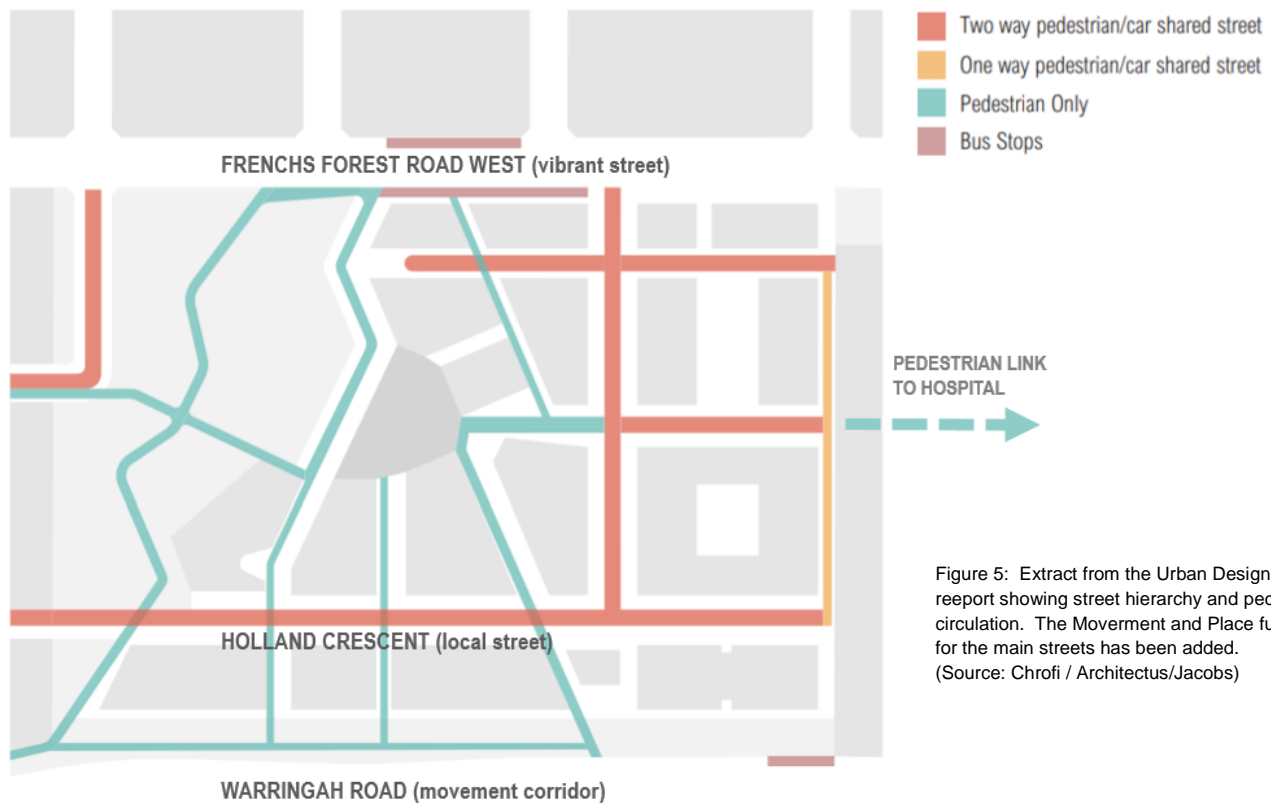


Figure 5: Extract from the Urban Design reeport showing street hierarchy and pedestrian circulation. The Movement and Place function for the main streets has been added. (Source: Chrofi / Architectus/Jacobs)

The network for pedestrians will be excellent. However, the document lacks any details of how cycling will be integrated into the plans. For example, the cross section of Frenchs Forest Road show 6-lanes of traffic with no bike infrastructure, and the Holland Crescent cross section show a standard 4-lane configuration with no space for bike, despite its designation as a shared street (Figure 6).

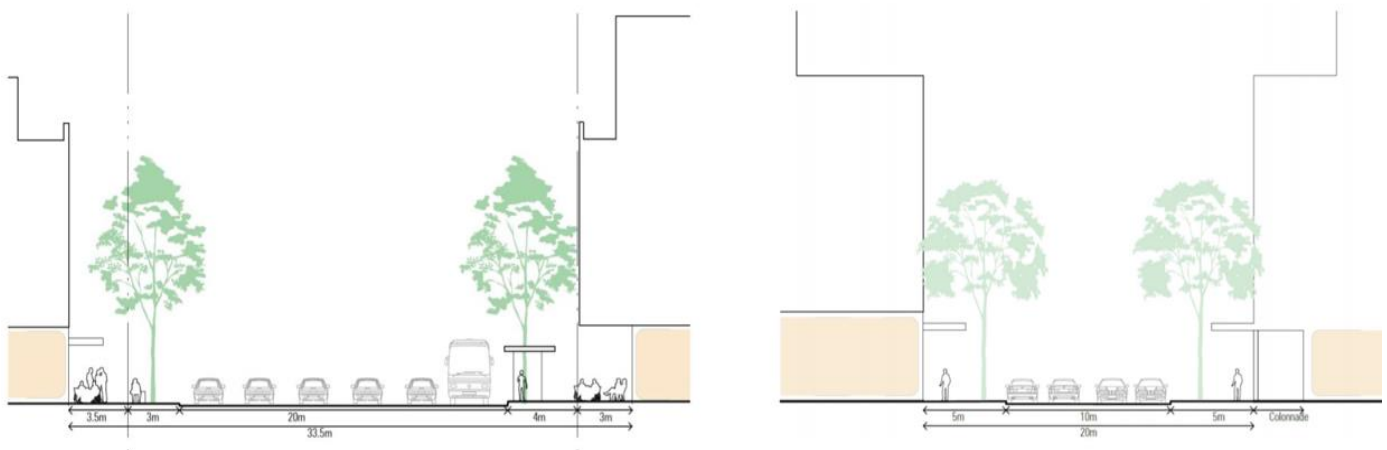


Figure 6: The proposed cross sections of Frenchs Forest Road West and Holland Crescent, as shown in the draft DCP for Frenchs Forest Town Centre (Source: Chrofi/Architectus/Northern Beaches Council).

A sketch of the proposed Boulevard on Frenchs Forest Road West shows people cycling in mixed traffic. This is not a suitable solution for a Principle Bicycle Network route that is intended to enable safe cycling for transport by people of all ages and abilities. The existing shared path on the southern side of the road is not shown on the cross section or in the artist's impression of the future street (Figure 7). The strategy envisions high levels of pedestrian activity, outdoor dining and street furniture on the Boulevard. We agree that a shared path would create conflict between cyclists and other users of the public realm and a shared treatment is not recommended.



Figure 7: Artist's impressions of the Boulevard on Frenchs Forest Road West. (Source: Chrofi)

A Transport Strategy^{xii} also supports the Place Strategy and contains objectives to provide multiple high-quality transport options and encourage the use of sustainable modes of transport to create a liveable community. However, Section 7 discussing the Active Transport is only one-page long and only shows the existing cycling network with no details of the proposed routes or treatments.

The draft Green Plan^{xiii} is also on exhibition. A network of green links through the town centre that aligns with the DCP is shown. There are no details about how the links will be designed. For the area surrounding the precinct, there is a commitment to complete the continuous cycle route to Manly Dam in the first 10 years. Unfortunately, projects such as a new bridge over Warringah Road, the green links along residential streets and a bridge to complete the Pipeline corridor are only listed as 'initiatives for investigation'.

The proposed Frenchs Forest SIC is expected to provide funding up to \$37.3 million of State and regional infrastructure to support the new residential growth which includes \$10.9 million for active transport and green links. However, this funding will be unlocked very slowly over the 3 phases of the Hospital Precinct Structure Plan and will not be sufficient to develop a truly connected and useful active transport network.

Finally, the various reports refer to a new land bridge connecting the town centre with a future BRT bus stop on Warringah Road, the Karingal Crescent Neighbourhood and the Green Grid Connections to Manly Dam. Figures 8 and 9 show two different visions and locations for this visionary concept. However, the bridge disappears from the draft Place Strategy and the associated DCP prepared by Northern Beaches Council. Some clarity regarding this proposal is needed for the final Place Strategy.

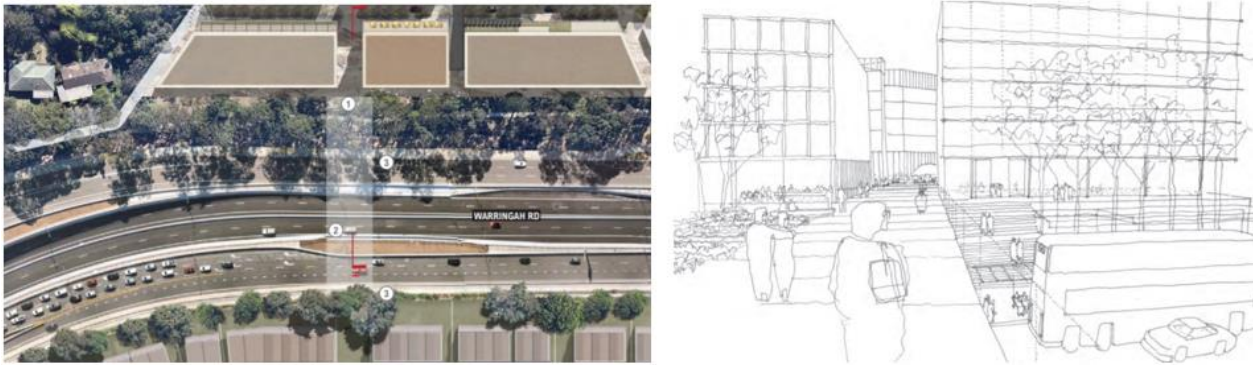


Figure 8: The pedestrian overpass proposed in the Urban Design Report. The bridge could be seamlessly joined into the piazza on grade and include landscaping. (Source: Chrofi/Architectus)

Figure 9: The Platform Park proposed in the draft Green Plan. (Source: Aecom)



Figure 30 Aspirational Concept Plan - Platform Park

Recommendations:

One of the three guiding policy themes at Bicycle NSW is 'Build it for Everyone'^{xiv} and we advocate for safe connected infrastructure that is suitable for riders from 8 to 80 years of age to use independently. It is essential that Northern Beaches Council, DPIE and Transport for NSW develop an adequate network of cycling routes that will allow **all** residents to consider trips by bicycle, reducing noise, pollution and congestion and increasing health and well-being.

1. Allocate road space to prioritise walking cycling and public transport

There has never been a better time to build for bike riding and active transport, as evidenced in the new Transport for NSW policies that require State projects to prioritize road space for active transport:

- Providing for Walking and Cycling in Transport Projects Policy CP21001^{xv}
- Road User Space Allocation Policy CP21000^{xvi}

Priority 21 of Towards 2040, the Northern Beaches LSPS, supports the reallocation of road space to create wider sidewalks, dedicated bus lanes or separated cycleways to reduce conflict and make it easier to walk, cycle or use public transport.

Order of Road User Space Considerations

Figure 10:
Diagram expressing Transport for NSW's
road user priority.
(Source: Transport for NSW)



1. Frenchs Forest Road West requires separated bicycle paths in place of one lane of traffic. Ideally the paths would sit on both sides of the road idea as a uni-directional pair but a bi-directional path on one side may be suitable in the short-to-medium term. Allowing this road to become a 6-lane traffic sewer will make it very difficult to achieve the place ambitions of the Boulevard. The separated path could revert to a shared path along the undeveloped western section of the road where pedestrian activity will be less intense.
2. Town centre roads with two lanes of traffic and two lanes of parking such as Holland Crescent and Main Street should have a bi-directional cycle path in place of one lane of parking. There will be 100,000 sq. m of basement car parking in the town centre and street parking should not be prioritized over active travel.

3. Internal roads designed to be shared by pedestrian and vehicles must have speed limits below 20km/h and very limited vehicle traffic. This will allow cyclists of all ages to safely use the network of roads to access the residential building, community facilities, shops, services and public transport stops.
4. When implementing the green links in residential streets surrounding the precinct, it is important not to lose green space, verges and landscaping when constructing shared paths. As recommended in the draft Green Plan, roads should be narrowed and landscaped verges widened to create space for pedestrians and cyclists. This will help reduce vehicle speeds, to create safer, quieter and more comfortable streets for walking and cycling.

2. Future proof the active transport network

The status quo of walking and cycling activity in the Frenchs Forest area is likely to change rapidly. The density of walkers will increase when new housing and retail is delivered as proposed. An upswing in travel by bikes has occurred recently due to Covid, individual reactions to climate change, a surge in local delivery services and the growing popularity of e-bikes. In addition, State policies to address climate change and urban liveability will add to pressures on councils to secure a much bigger travel share for walking and cycling. It is essential to future proof the cycle network by allowing for increased demand at the outset. Paths should be wide and separated from pedestrians where possible.

It is important to refer to the new Cycleway Design Toolbox^{xvii} to ensure that the paths are constructed to current best practice.

3. Ensure that active transport infrastructure is delivered as a condition of planning consent

Develop the active transport plans from the outset, consult early and make provision of walking and cycling paths a condition of planning consent. Commit to active transport infrastructure delivery as early as possible in the project in order to encourage mode-shift when people move to the precinct and keep riders and walkers safely separated from heavy vehicles. This will relieve pressure on the roads both during and after construction. Despite the changing legislation around Special Infrastructure Contributions, we recommend that developer contributions go directly to Northern Beaches Council to ensure the funds are spent in the precinct.

4. Provide segregated infrastructure rather than shared paths in most locations

Our preferred infrastructure is always completely separated paths that cater for all riders of all ages and abilities. According to the best practice 'cycling segmentation' model, developed in Portland USA to identify the type and needs of existing and potential bike riders^{xviii}, such cycle paths will allow 70% of local residents to consider journeys by bike (Figure 11).

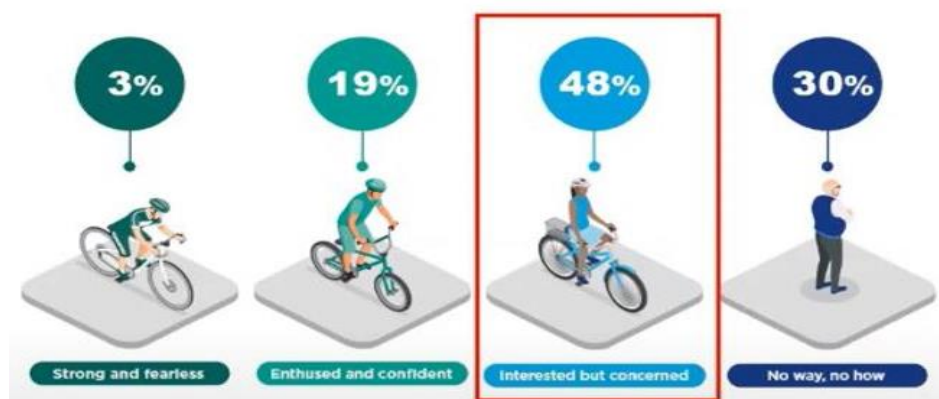


Figure 11:
Four general categories of comfort levels
for cycling as transportation.
Source: North Sydney Council

The provision of properly segregated infrastructure on key commuter routes with space to accommodate future demand must be a key policy position of Northern Beaches Council and DPIE. Shared paths are not suitable for areas with high pedestrian and cycling activity and will not lead to an acceptable level of amenity and safety for either walkers or riders with conflict occurring between different users. Door zone bike lanes, bike stencils on the road and dangerous intersections will continue to deter the 48%^{xix} of people who are 'interested but concerned', from making the switch to cycling, and parents will still feel driving their children to school and activities is the only way to keep them safe from being hit by cars. Any small increase in inconvenience to car drivers created by reducing road space for driving and parking private vehicles will incentivise the mode-shift that Transport for NSW and Northern Beaches Council seek, benefitting local residents with quieter streets, and less pollution, noise and through-traffic.

5. Reduce speed limits to 30km/h on any local streets with on-road cycle routes

30km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely^{xx} and is becoming a standard speed limit in many parts of the world. All single lane roads in Spain have been under a 30km/h limit since May 2021 and 30% of UK residents live in 20mph areas^{xxi}.

Lower speed limits are an important building block for Vision Zero, an approach to road safety that was launched in Sweden in 1994 with the simple premise that no loss of life is acceptable. The Vision Zero approach has been highly successful and has spread to many other countries. The key policies include prioritizing low urban speed limits, pedestrian zones, physical separation between bicycle and car traffic, data-based traffic enforcement and behaviour-change education^{xxii}.

6. Maintain a focus on the important details of the cycle network

It is the **detailed design** of cycle routes, end of trip facilities and wayfinding that will encourage the uptake of cycling and reduce dependence on private vehicles.

It is essential to ensure that popular daily destinations such as shops, schools and bus stops are easy to reach by bicycle for all residents of all ages and abilities. In particular, safe connections with all education facilities along the routes must be incorporated. Cycling infrastructure needs to be safe and continuous to increase the mode share of cycling and reduce congestion associated with school journeys.

Integration of the routes with bus stops is essential to ensure easy access by bike and foot. All public transport journeys start and finish with a walk or cycle. By providing high-quality, safe conditions for walking to the station, residents will be encouraged to use mass transit. If safe cycling is facilitated, the catchment for the bus stop increases, breaking down the first/last mile barrier which can inhibit take-up of public transport.

Parking and other end-of-trip facilities should be provided at journey end locations to further support riders and encourage participation. Note that the DCP only requires end-of-trip facilities must be provided for buildings which do not comprise any residential uses. This must be changed to ensure provision for all building with commercial uses – which will exclude few buildings in a mixed-use precinct.

Wayfinding supports visitors to vibrant centres by clearly articulating and communicating the most efficient and safest route. Signage style for wayfinding should be consistent throughout Frenchs Forest, the Northern Beaches and beyond.

The Northern Beaches Bike Plan and Move 2038, the Northern Beaches Transport Strategy, clarify how these principles should be applied at Frenchs Forest.

Conclusion:

Bicycle NSW supports the game-changing upgrades to the active transport network made possible by the redevelopment of the Frenchs Forest Precinct. Now is the time to develop an inspirational vision for allocating road space and integrating transport modes based on desired future outcomes. Safe infrastructure to support walking and cycling will benefit everyone in the community, reducing congestion and pollution while improving public health and providing more equitable access to employment, services and public transport.

Cycle paths offer the greatest mode-shift potential when riders are able to complete a whole journey safely. The City of Parramatta and City of Sydney have demonstrated that building safe, well-connected cycleways works to induce mode-shift to active transport. Similar vision is required for Frenchs Forest to achieve the ambition increase in active travel and decrease in car trips set out in Move 2038.

This submission has also been sent to Northern Beaches Council.

We look forward to working with DPIE and Northern Beaches Council to progress the delivery of bicycle infrastructure in the area.

Yours faithfully,

Sarah Bickford

Bike Planner
Bicycle NSW

ⁱ This was reduced to 4,360 in the NB Council Local Housing Strategy, adopted in April 2021.
<https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Common/Output/Document.aspx?t=webdoc&id=PIDEAanAopIV0A60ki4OEg==>

ⁱⁱ DPIE. 2021. Draft Frenchs Forest 2041 Place Strategy. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Frenchs+Forest+2041+Draft+Place+Strategy.pdf

ⁱⁱⁱ NSW Government, Future Transport 2056 [Online 1/4/2020] <https://future.transport.nsw.gov.au/plans/future-transport-strategy/future-transport-greater-sydney>, Points 3-5

^{iv} Greater Sydney Commission, A Metropolis of Three Cities, 2018. <https://www.greater.sydney/metropolis-of-three-cities>

^v Greater Sydney Commission, North District Plan, 2018. <https://www.greater.sydney/north-district-plan>

^{vi} Sydney Green Grid, North District. Tyrrell Studio, 2017.

<https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/plans/sydney-green-grid-plan-6-north-district-2017.pdf>

^v Northern Beaches Community Strategic Plan – Shape 2028.

<https://www.northernbeaches.nsw.gov.au/sites/default/files/shape-2028-community-strategic-plan.pdf>

^{viii} Northern Beaches LSPS - Towards 2040. 2020, April.

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/policies-register/planning-strategies/local-strategic-planning-statement-lsps/lsp-towards-2040.pdf>

^{ix} Northern Beaches Council. 2018. Move – Northern Beaches Transport Strategy 2038.

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/policies-register/transport/transport-strategy/transportstrategy.pdf>

^x Northern Beaches Bike Plan. 2020, July. https://yoursay.northernbeaches.nsw.gov.au/download_file/3194/2346

^{xi} Architectus/Chrofi. 2020, July. Frenchs Forest Precinct urban design report and public domain strategy. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Urban+Design+Report.PDF

^{xii} Jacobs. 2020, December. Frenchs Forest Planned Precinct transport strategy. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Frenchs+Forest+Transport+Strategy.PDF

^{xiii} Aecom. 2020, December. Frenchs Forest draft Green Plan. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Draft+Green+Plan.PDF

^{xiv} Bicycle NSW, Policy Framework. [Online as at 19/7/2021] <https://bicyclensw.org.au/our-policy/>

^{xv} NSW Government, Providing for Walking and Cycling in Transport Projects Policy CP21001, [Online as at 19/2/2021] www.transport.nsw.gov.au/system/files/media/documents/2021/providing-for-walking-and-cycling-in-transport-projects-policy.pdf

^{xvi} NSW Government, Road User Space Allocation Policy CP21000, [Online as at 19/2/2021] www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf

^{xvii} Cycleway Design Toolbox: designing for cycling and micromobility. Transport for NSW. <https://www.transport.nsw.gov.au/system/files/media/documents/2021/Cycleway-Design-Toolbox-Web.pdf>

^{xviii} Roger Geller. (2009). Four types of cyclists. Portland Bureau of Transportation. <https://www.portlandoregon.gov/transportation/article/264746>

^{xix} 70% of people when surveyed said they would ride more if they felt safe, NSW Government, Sydney's Cycling Future (2013) [Online as at 24/2/2021] <https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/sydneys-cycling-future-web.pdf>

^{xx} City of Yarra - 30km/h speed limit: pre-trial final report, 2017. <https://thanksfor30.com.au/sites/default/files/2018-08/City-of-Yarra-Pre-Trial-Report-Aug-2017-FINAL%5B1%5D.pdf>

^{xxi} O'Sullivan, F. (2020, November). Why Europe is slowing down. Bloomberg CityLab. <https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-and-the-u-k>

^{xxii} Vision Zero Network. (2015, April 13). European Cities Lead the Way Toward Vision Zero. <https://visionzeronetwork.org/european-cities-lead-the-way-toward-vision-zero/>

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 5:08:12 PM

Submitted on Fri, 03/09/2021 - 17:07

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

■

Last name

■

I would like my submission to remain confidential

Yes

Info

Email

■

Suburb/Town & Postcode

Dee Why

Submission

The 2021 Community Development TAFE student group on the Northern Beaches, would like to share our personal, group submission as part of our contribution, advocacy and care for our local community.

The development at Frenchs Forest has a lot to offer with affordable housing, supporting local jobs, active travel, public transport, business, public spaces and more. A new high school to support this new population will be essential and valuable too.

Our concerns to highlight for this development are:

Education

If 2000 residences are to be built, the predicted and future increase in primary school student population for the local Frenchs Forest Primary school will be significant so we would like the planning to ensure that:

- demountable classrooms will never be required and rather (developments should not come at the cost of the wellbeing of the student population)
- permanent multi-storey classrooms are planned if they will be required or
- a new primary school is built with shared use of the new high school facilities.
- To ensure 25m² / student of climate friendly, open space is maintained and the oval is preserved, to support best student health and wellbeing outcomes.

Parking

Cater for increased parking needs so that each new residence has 2 spaces, to reduce parking issues for the community.

Sewerage

Ensure adequate infrastructure to support the increased pressure on the current sewerage systems due to increased population and maintain the water quality of our oceans and waterways during storm events and with storm water run-off (they are already under strain). The capacity of the sewerage and waste systems will need to cater proportionally for the predicted population.

Environment

Ensure a green star building design to support future environmental outcomes.

We look forward to seeing that these points presented have already been addressed in the plans or will be added in the plans moving forward and we hope this development seamlessly integrates with community needs, proving to be a worthwhile and valuable contribution to the area.

Kind regards,

Eve Clark on behalf of the 23 Northern Beaches TAFE Community Development students of 2021.

I agree to the above statement

Yes

Resident's submission to the Draft Frenchs Forest Place Strategy

September 3, 2021

The proposed Frenchs Forest Place Strategy development is not only excessive but will ultimately create further development pressures in the area.

- The strategy notes that students will enjoy easy connections to transport. This implies that students will have to deal with multiple connections to the school's relocation to Allambie and will increase commuting time for students who live on its western side, more so for those that must cross Warringah Road. Allambie Road is a busy road and the roads between the proposed school site and Warringah Road are often gridlocked.
- The existing sports fields at Frenchs Forest High are used by both the local soccer and cricket competitions on weekends, parking is adequate and does not spill on to local streets. There are no assurances or provision to provide the community with confidence that the new school's sporting fields be open for public use, that there will be adequate parking, or that nearby residents are not affected.
- Relocation will see the further loss of mature trees, which are habitat for the local wildlife. The access clearing always seems to be at the maximum for tree removal as has been seen along Warringah Road, only to see a few trees replaced. The widening of Warringah Road saw the destruction of a significant number of mature trees, for those very reasons, they once provided shade, noise abatement and symbolised the area. Any replanting efforts will take years to have any real effect, with no provision in the planning as to the maintenance and care in the early years of the trees. The document mentions the planting of 732 trees which is a token in terms of replacement of canopy.
- The images provided of the town centre precinct significant areas of hard surfaces, and the trees shown would provide little to no relief from both direct and reflected heat during the hotter months of the year. The massive widening of Warringah Road, which has little or no shade, added to the urban heat sink as will this proposed development.
- The development significantly increases Frenchs Forest's current population. There is no consideration in the strategy for the inevitable pressure on existing infrastructure, not retail outlets and the ubiquitous food courts but additional public amenities such additional schools and fields and parks. The strategy mentions \$19.5m is to be provided for education by the Frenchs Forest SIC. A \$19.5million contribution is insufficient to build a new school. There is no projections for the planning for additional public schools in the future, which would be a logical conclusion for the virtual tripling of the current population base. It does not appear to be mentioned in the strategy document. There is not enough provision for additional sports fields freely available to the public to accommodate the increased number of participants.
- The technical analysis notes that "a large shift from private car use to public transport is essential. The main access road to the town centre may be at capacity at 70% town centre development". This aspect of the strategy cannot be controlled. There is no evidence that a significant number of the new residents will live and work in the area. It is erroneous to presume as such. There is a strong case that a large proportion will commute and depending on the rest of the transport links throughout Sydney, a good deal will probably do so by car. Increasing the population in the area marked for development inevitably places further pressure on the local road network. Those travelling from the east past the town centre will suffer increased travelling times.
- The strategy document states that Frenchs Forest is a car based suburb with limited public transport. The area is reasonably well serviced by private and public bus transport during the working week, in terms of direct routes to the CBD and Chatswood, there is no scope to consider other transport options so buses will remain the sole public transport option.
- There is nothing in the document proposing a requirement to minimise the level of artificial light during the night. This is relevant to not only the local residents but the wildlife. There is already a significant glow from the Frenchs Forest hospital in the evening.

- The strategy makes generalised statements such as “capacity to” and “potentially evolve” and that the Town Centre “will be a hub of knowledge intensive jobs, innovation and service delivery at the heart of a growing community”. The latter cannot be guaranteed, the claimed scenario may never eventuate and the Town Centre residents may be commuters, which is not the intention of the proposal.
- Frenchs Forest has also been subjected to impositions from the Warringah Road widening and Northern Beaches Hospital construction, the former taking nearly four years to complete. If the proposed development were to proceed the residents of the area will endure years more of traffic delays, construction, dust and noise pollution which significantly impacts the existing populations health and wellbeing.
- What this development will do is impose dense urbanisation on what is a relatively quiet, residential suburb with a mature tree canopy which is considered a positive amenity within the suburb.
- If the school were not situated on an elevated site that provides fabulous views to the north, south, east and west, this proposed development probably would never have been considered. Such development will command a premium and create its own inequalities in terms of affordability and diversity of residents. Once again private gain trumps public interest.

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 6:04:58 PM

Submitted on Fri, 03/09/2021 - 18:04

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Paul

Last name

Cunningham

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Frenchs Forest

Submission

I wish to object most strongly to your proposed "development" of Frenchs Forest, of which I am a resident.

Frenchs Forest is not a town. It is (or at least it was, until the hospital and its associated roads were built) a verdant residential suburb. That is why we residents chose to live here. But our feelings are being totally ignored, as both state and local governments appear intent on completing the devastation they have already started.

Only a planner could dream up the self-contradictory term "urban forest", and then apply it to what is proposed. A tree canopy of "up to" 30% (i.e. could be zero) cannot be termed a forest.

Only a planner could think it a good idea to obliterate a perfectly good school, together with the only significant green space left in the area, only to have to build less suitable premises in a less convenient location. How can you talk of a "health and education precinct" when you have just removed its major educational asset?

As with the hospital/roads, the planning process is dishonest. We have only a vague idea of your intentions for the area to the west of Rabbett Street and Forestway, while you nominate three other areas as subject to future investigation. Staging the process in this way makes it impossible to evaluate the full long-term impact of your plans.

The plethora of documents being issued by state and local authorities smacks of deliberate obfuscation, especially when documents use different measures. For example, Warringah Council tells us there will be buildings up to 12 storeys in the "town centre", whereas NSW Planning says the maximum height will be 40 metres, with nothing higher than the hospital. Either way, such high-rise buildings are inappropriate. Perched on top of a ridge, they will be an eye-sore over a wide area. And has it not been established that housing people in little boxes stuck up in the sky, out of touch with nature, is detrimental to their mental health?

The fundamental problem with your plan is that extra people are incompatible with quality of life. When you use words such as "revitalise", "enhance", "vibrant", and the like, what you seem to mean is "more crowded". That is NOT desirable, especially given that your idea of social interaction appears limited to eating, drinking, and retail.

In particular, people create NOISE, a major environmental pollutant but one which is totally ignored in your plans. To make matters worse, you are encouraging social activity in the town centre "day and night", which will mean 24/7 noise. Because of the local topography, noise from the current school location can spread far and wide. Even without social activity, noise from machinery such as ventilation of underground shops and parking and tall buildings will be continuous. Bright lights from tall buildings will also be a permanent night-time annoyance. Consideration should be given to making the "town centre" alcohol-free.

Warringah Road constitutes an obvious practical boundary to the town centre concept. The two curved over-bridges are a very inconvenient way to cross, evidenced by the number of pedestrians who jaywalk at surface level directly, illegally and dangerously between the hospital and Hilmer Street, the incidence of which would certainly increase if the Bantry Bay "neighbourhood centre" were to proceed. Your plans refer to maintaining the heritage of that area, but nothing could be less suitable than to build four big 5-storey blocks, with their associated traffic. Hilmer Street in particular is already clogged with hospital-related parking.

The residential streets south of Warringah Road should be allowed to retain their character. They cannot cope with additional traffic, from either the Bantry Bay or Karingah neighbourhoods. There should be no rezoning or development south of Warringah Road.

At Brick Pit Reserve there is an attractive Queensland Bottle Tree which, whilst not native, is unique in the area and warrants protection.

There seems to be an obsession with shared paths for cyclists and pedestrians. These are dangerous, economically unjustifiable, and an environmental disaster. To use the one recently installed on Fitzpatrick Avenue East as an example, around 15 lovely big trees were felled, and associated grass verges removed, to be replaced by a strip of light-grey concrete which reflects sun, radiates heat, and is rarely if ever used by cyclists.

In instances where the shared paths are used by both classes (eg the over-bridges), the pedestrians are endangered by cyclists who don't ring to signal their approach, don't dismount where required, don't observe the lanes, and often ride with reckless speed.

This submission is made in the full understanding that it is futile. Our urban planners and their political masters have consistently demonstrated that the so-called consultation process is an utter sham. They will impose their wishes regardless of the views of the residents, and of others who value quality of life and the environment. Nevertheless I consider it essential that I register my strong opposition to the further devastation of Frenchs Forest.

PAUL CUNNINGHAM
3 Sept 21

I agree to the above statement
Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Special Infrastructure Contribution
Date: Friday, 3 September 2021 6:28:53 PM

Submitted on Fri, 03/09/2021 - 18:28

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████████

Last name

██████████

I would like my submission to remain confidential

Yes

Info

Email

████████████████████

Suburb/Town & Postcode

Frenchs Forest 2086

Submission

I would like to object to the proposed Strategy for Frenchs Forest.

I object on the following grounds:

- 1) The new location for the Forest High School is not in Frenchs Forest - it is not in the suburb it is meant to serve. It will mean that many children have to cross the busy Warringah road and or Wakehurst Parkway and travel a considerable further distance to reach the high school. This will result in increased traffic as parents will have to drive their children to school as it will no longer be close enough for them to safely walk to.
- 2) The scale and bulk of the proposed town centre and surrounding housing is excessive. The size and scale of the proposed town is not acceptable and is completely out of scale and character for the local area. 12 storey towers are not acceptable for this area and the development should be restricted to no more than 4 stories.
- 3) the additional development will generate significant extra traffic to/from the area, and given the lack of mass public transport and the roads already being past capacity with the existing population, neither can sustain the proposed additional population. Local bus services to the city were already at full capacity prior to the pandemic, and will return to capacity once the pandemic is over. It isn't feasible to increase the population by the amount proposed with only buses for public transport. As there is currently no plan to build a rail service to the area this will result in over-capacity of current public transport and additional extra traffic trying to access the area.
- 4) The 3.5m green space barrier between the newly proposed town centre is minimal and insufficient and will not provide a meaningful visual barrier between Warringah Road and bulk and scale of the new development. It will be an ugly eyesore.
- 5) The 15% affordable housing is insufficient, the percentage should be higher and there should be a requirement that the affordable housing to be identical to the private housing and should have access to the same facilities to prevent the developers building small and low quality slum accommodation for the disadvantaged.

The school should remain where it is and any redevelopment should be limited to the existing Forestway site. Frenchs Forest does not either need nor want a new town centre.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 6:55:57 PM

Submitted on Fri, 03/09/2021 - 18:55

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Killarney Heights 2087

Submission

Hi,

It's a sensible plan and I'm sure that Frenchs Forest precinct will continue to grow around this core.

It would be great to preserve enough underground space for potential metro station and a metro line. It will be handy in 30-40 years time when a metro line will become viable and needed.

As I understand 250 affordable dwellings will be funded by developers' contributions so effectively this cost will be an additional levy on other residents who will buy new dwellings in this area.

It would be fair if part of money which NSW Government will get from selling land in Frenchs Forest will also be used to fund additional affordable dwellings on Northern Beaches.

It can be done as a state contribution to a dedicated special purpose trust which will own those affordable dwellings.

I think that it will be very important to create a sustainable and effective ownership structure for affordable housing. Those dwellings will be managed by a non-for-profit organization but should be owned by the council/state-owned special entity for the benefit of future generations.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 6:59:04 PM

Submitted on Fri, 03/09/2021 - 18:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Henry

Last name

Booth

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Frenchs Forest 2086

Submission

As a life-long resident in the proposed neighbourhood centre between Hilmer Street, Bantry Bay Road and Primrose Avenue, I have a very keen interest in the development plan.

The proposed neighbourhood centre is a great idea but it needs more commitment to make it a realistic proposition. A greater floor-space ratio is required to make the centre viable for developers to create a useful retail/business/residential block in this area.

It is essential to increase the floor-space ratio to allow for parking for the residents and business employees and customers. With this in place the neighbourhood centre would be an attractive and realistic project for an experienced property developer. This will greatly benefit the southern side of Warringah Road as there would be no need to cross over to the main Frenchs Forest precinct to access the services provided here. This will be useful in cutting down traffic in the area and allowing pedestrians, many of whom would be the local elderly and infirm, to be part of a truly local neighbourhood centre.

I propose a floor-space ratio of at least 2 for the neighbourhood centre, with a tiered increase to 2.2 for the areas least likely to overshadow neighbouring residences. We have no buildings across from the block on Bantry Bay road and a tiered effect would easily remove any shadowing from the other side of Primrose Avenue. The proposed neighbourhood centre is bounded on three sides by roads, so there are multiple options for entries and exits. We are also right next to the 6-lane Warringah Road, with two separate direct entry/exit points. This is in stark contrast to those streets on the other side of the hospital which lead onto single-lane roads, yet have far greater density development proposals.

I agree to the above statement

Yes

The FRENCHS FOREST PLACE project – The SMART SOLUTION alternative.

The Frenchs Forest Place Strategy, has a “vision for a multi-level series of dwellings to combine as a Future Town Centre for Frenchs Forest- 2022 era.

Unfortunately the DPIE concept DOES NOT fully understand how to “FIX the Ecological Mal-administration of the Former Pittwater LGA “.

The Speech by NSW Planning Minister, Rob Stokes MP exposed the CORE FAILURE in the Avalon Beach area was to approved a dwelling complex that Failed to preserve the Tree Canopy and Access way between known Nature Reserves in the Greater Avalon area.

(The “Green Infrastructure Cost “ of the Rectification is likely to be “unfunded?” by the Reformed Northern Beaches Council “Group” ?)

THE FRENCHS FOREST PLACE project – THE DPIE STATEMENT -

Frenchs Forest Place Strategy. The draft Frenchs Forest Place Strategy is on public exhibition until Friday 3 September 2021. The draft place strategy includes a vibrant new town centre and will help implement phase one of the **Northern Beaches Hospital Precinct Structure Plan**.

1. New vision for Frenchs Forest | NSW Dept of Planning ...

<https://www.dpie.nsw.gov.au/.../2021/new-vision-for-frenchs-forest>

5/8/2021 · A reinvigorated vibrant town centre, 2000 new homes, road upgrades and more public space form a 20-year vision to support the future growth of Frenchs Forest. Minister for Planning and Public Spaces Rob Stokes today released the **Frenchs Forest Place Strategy** for public consultation, saying it set out what was needed to support a predicted population growth of 39,000 new residents by 2036.

The Vimeo comments give a clue that the “Concept should be further developed to provide a “larger Green Space solution”.

The CORE bike paths in town centre streets is MISSING and this is NOT what happens in the Copenhagen- area.

There seems that some “developers” will wish for higher Hieght Limits in some more “fringe areas” .

The Cost of the SIC, for allowing greater DENSITY in the SITE seems “TOO CHEAP” and this needs to be reviewed within the proposed REFORM of the Infrastructure Levies – after the Productivity Commission Report that has the NSW DPIE agreeing to adopt all 29 recommendations.

The Bio-diversity “ Green Infrastructure Cost “ is likely to be “underfunded” within the circa 40 mill SIC proposal.

The Green Infrastructure Funding Costs – could include a WILDLIFE OVERPASS North South near the Hospital and an East West Corridor to connect into bushland to the West of Frenchs Forest Town Centre.

The Cost of REGIONALLY Retro Fitting the area with a Functional Native Fauna Habitat Area and Corridor is Complex and unlikely to have been solved by Urban Planners like Mr Andrew Piggot of Northern Beaches (Formerly of Pittwater Council).

A Northern Beaches Council note indicates that bio-diversity off-set sites may be too expensive locally so cause a Decline in Bio-diversity In Northern Beaches.

The Frenchs Forest Town Centre appears to be an OPPORTUNITY to use the RMIT University “ONSETS” project (refer to the RMIT web-site) as a way to provide a better bio-diversity solution than using the “Bio-diversity Off-set “ solution, as the early evidence is Northern Beaches Council can not find “suitable local “off-set sites”?


The Bantry Bay Shopping Centre could have a “Higher Limit? “ .

There is potential to have “Greater Green” Planting but that requires attention to Detail, Not yet shown within the proposed Town Centre Proposal. The One Central Park Building in Broadway won the best Tall Building in the World recently.



FRENCHS FOREST DRAFT GREEN PLAN

Draft Prepared for Public Exhibition
December 2020





This fails to incorporate the Regional Bio-diversity Corridor Network in a “SAFE FOR WILDLIFE MOVEMENT NETWORK”

The details seems to 2D in its Planting Systems compared to the Better examples in Italy or Sydney

THE BROADER LANDSCAPE SCALE ECOLOGICAL SOLUTIONS

– omitted by the FRENCHS FOREST PLACE Strategy Plan.

Within this the Greater Frenchs Forest area is to be investigated for its potential to provide “Greater Capacity” of Smaller Houses” that make up the circa 1,000 Dwellings within the Proposed Ingleside Place Precinct (That was rejected by Northern Beaches Council (claiming that Bio-diversity was an issue).

In my own sub-mission I proposed the area provide a Circa 170 Ha Native Fauna Sanctuary Habitat Space. * But this requires the capacity to provide adequate Habitat Space ? (There is proof that there may be a lack of Habitat Locally? So this is an SMART SOLUTION to provide a “Sustainable Habitat”).

- ❖ ***The Northern Beaches LGA has a “Deficiency in its ecological Performance” and “little ability to rectify its historic ecological mal-administration”***
- ❖ ***The report by SMITH AND SMITH dated 1990 was audited by NPWS, so should have some credibility within its report.***
- ❖ ***The way to have a sustainable recovery of a native fauna population that has been listed as endangered, but with “ROAD BLOCKS” of Urban Development in “KEY STRATEGIC SITES”***
-
- ❖ ***So using “Higher value” urban development to “off-set the cost of “down valuing the Natural Capital sites” may be able to “fund the missing “Green Infrastructure Project”.***
- ❖ ***It may need to assess the Bio-diversity “Rectification Project” at a Regional Landscape Scale.***

❖ THE AVALON BOWLO site “Gateway Proposal”.

The Avalon Bowlo is adjacent to the Pittwater Palms Retirement Village. So as both may be a FLOOD HAZARD RISK site, The “Government Authority” may wish to reduce the FLOOD RISK for both sites, by allowing the “PPRV” to be demolished and the Former Swamp Mahogany Forest or

Grey Gum Forest re-planted within the “ PPRV” site, thus achieving the Forest Preservation aim, of Avalon Preservation Trust in circa 1985.

The “PPRV” was a site mentioned within the Sept 16, 2020 Speech in NSW Parliament on Avalon Beach Koalas “Wipe out”.

Soils

The Barrenjoey Peninsula Soil Geology is different to the Sandstone Formations south of Narrabeen Lakes.

Soils formed on Hawkesbury Sandstone are generally shallow, sandy, stony and infertile.

The soils formed on the Newport Formation are generally deeper, more clayey and more fertile than those on the Hawkesbury sandstone.

Soils derived from Quaternary alluvium vary in fertility, salinity and soil moisture conditions, depending on the nature of the alluvium. The soil landscapes of the area have been mapped at a scale of 1:100 000 by Chapman et al. (1989) and described in detail by Chapman and Murphy (1989). Soil landscapes are land units that have recognisable and specifiable topographies and soils.

The Wiamatta Shales are also within the area of South West Sydney that has known Koala Habitat.

The variety of vegetation communities in Pittwater provides a variety of fauna habitats. The communities associated with Newport Formation and Quaternary alluvium are generally poorly represented in the nearby national parks. For example, Swamp Mahogany Forest, which is an important habitat for threatened fauna species, is not represented at all in Ku-ringgai Chase, Garigal, Brisbane Water or Bouddi National Parks.

Wianamatta Group



The name Wianamatta is familiar through the loose usage of the term ‘Wianamatta Shale’ to embrace the Triassic rocks that overlie the Hawkesbury Sandstone. This is

an informal term, distinctly woolly in its definition, and should be avoided, but if it must be used, 'shale' or 'shales' should always be spelt lower-case.

Wianamatta Group, derived from the Aboriginal name for South Creek, was established formally in 1952, fully documented in 1954 and further revised in 1979. The group consists of three formations: the Ashfield Shale, Minchinbury Sandstone and Bringelly Shale. It occupies the centre of the Sydney Basin, lapping onto the lower Blue Mountains and extending southwards to the Southern Highlands. It has been defined largely from drillhole data because outcrop is mostly limited to road and railway cuttings and quarries.

KOALA Distribution

Koalas are sparsely distributed over the Hornsby Plateau (Curtin and Lunney 1995, O'Brien 1995), including Ku-ring-gai Chase National Park (Smith and Smith 1990b). They are also sparsely distributed over the Woronora Plateau (Robinson 1985), including the well-known population near Campbelltown (Close 1993). Koalas are rare west of Sydney, in the Blue Mountains (Smith and Smith 1990a).

The Macarthur area Koala Population is disease Free, and Breeding but has a density of 1 koala per 10 Ha to 20 Ha.

So using that density ratio, to recovery the "LOST BUSHLAND HABITAT" of the Barrenjoey Peninsula Koalas are sparsely distributed over the Hornsby Plateau (Curtin and Lunney

1995, O'Brien 1995), including Ku-ring-gai Chase National Park (Smith and Smith 1990b).

They are also sparsely distributed over the Woronora Plateau (Robinson 1985), including the

well-known population near Campbelltown (Close 1993). Koalas are rare west of Sydney, in

the Blue Mountains (Smith and Smith 1990a). would take 500 Ha by 10 = 5,000 Ha Habitat?

But less Ha if the "Habitat" can use "SMART SOLUTIONS" to improve the capacity to circa 1 koala per Ha (a 10 to 20 fold increase in capacity ?) . So the LATTER is considered for Ingleside Place Strategy site area.

- ❖ ***The "Re-location of circa 1000 small home sites (within the proposed Ingleside Place Strategy) is potentially "re-located within the Frenchs Forest " Greater Town Area" ?***
- ❖ ***THE INGLESIDE PLACE STRATEGY – alternative to increase Bio-diversity Habitat within a Bushfire safe location . The cost of "acquiring the extra habitat" could be significant. But less if done many years ago when the Ingleside area was part of the GREEN BELT of GREATER SYDNEY.***
- ❖ ***So the Northern Beaches Council has "rejected" the Proposed Ingleside Place Strategy claiming two Issues – Bio-diversity and Bushfire Hazard Risk***
- ❖ ***Both could be a "Covering excuse" to allow a re-think, and higher Urban Density for the area ?***

- ❖ ***So in "accepting the criticism" a proposal that allows a circa 170 Ha Bushland Native Fauna Sanctuary can be "envisioned" but how is it "FUNDED"?***

It could have been Considered in detail within the proposed 2000 era Barrenjoey Koala Recovery Project, but in 2021 it still is a “DREAM” event ?

The SMART SOLUTION could instead use the circa 170 Ha as a Core Habitat area for a Recovery of Threatened Native Fauna.

This would be a “Canopy Bushfire Safe” habitat area, so likely to be suitable for Koala Habitat. Plus a range of associated Native Fauna Species including glider possums and some birds that prefer to access old growth Forests with “Tree Hollows”. So the “SMART SOLUTION” to increase the supply of “Tree Hollows” in younger trees, is to use “Nest Boxes” or “Artificial Tree Hollows” (using the example of the Habitat Solution in Tasmania for the endangered Swift Parrot in Tasmania, done by Ecologists from ANU). There they installed an extra 300 Nest Boxes for a potential population of 30 Swift Parrots who were “competing with sugar Gliders for Tree Hollow Sites to Habitat.

Checking Thru the Native Fauna Management Plan for Pittwater Council in 2000 the following items are included ::

1..

SUMMARY OF MANAGEMENT ISSUES AND ACTIONS

Management issue	Management actions	Responsibility	Priority
Recovery plans (3.2)	Co-operate with the National Parks and Wildlife Service in the preparation of recovery plans for threatened fauna and flora.	National Parks and Wildlife Service, Pittwater Council	High
	Implement measures for the recovery of threatened fauna and flora as identified in recovery plans, and for which Pittwater Council is responsible.		High

So this “High Priority” task has been “avoided by Pittwater Council and Later Northern Beaches Council, until circa 2021.

2.

Management issue	Management actions	Responsibility	Priority
Fire management (3.5)	Prepare and implement plans of management for Council bushland reserves that address fire management issues in relation to threatened fauna and flora, including the desirability of ecological burns for habitat restoration purposes, as well as the impacts and preferred techniques of hazard reduction.	Pittwater Council, Warringah-Pittwater Bushfire Management Committee, National Parks and Wildlife Service	High
	Liaise with the Warringah-Pittwater Bush Fire Management Committee to integrate conservation of threatened fauna and flora with bushfire risk management in Pittwater.		High
	Co-operate with the National Parks and Wildlife Service in the development and implementation of a threat abatement plan for high frequency fire in New South Wales.		High
Wildlife corridors (3.9)	Implement the Pittwater Habitat and Wildlife Corridors Conservation Strategy. Review its operation and effectiveness. Develop and implement additional measures for protection and enhancement of corridors where necessary.	Pittwater Council	High
	Plant additional native trees and shrubs on Council lands in high priority wildlife corridors identified in the Habitat and Wildlife Corridors Conservation Strategy.		High
	Encourage similar plantings by other land owners and managers in high priority wildlife corridors.		High
	Prepare and implement a Development Control Plan for the Conservation of Biodiversity in Pittwater to ensure that future development is compatible with retention of wildlife corridors and, where possible, incorporates measures to enhance and restore corridors.		High

This appears to have been “FAILED” by the Local Govt Authority, despite it being adopted by Pittwater Council as indicated within the document.

3.

Management issue	Management actions	Responsibility	Priority
Control of dog and cat predation (3.11)	Develop and implement effective and humane control programs for feral cats and dogs in the Pittwater area, with special emphasis on sites where they are a particular threat to threatened fauna species.	Pittwater Council, National Parks and Wildlife Service	High
	Implement Council's statutory obligations and responsibilities for control of dogs and cats under the Companion Animals Act.		High
	Continue and expand existing community education programs aimed at reducing the impact of cats and dogs on native fauna. Encourage the community to report feral cats, dogs and foxes to Council.		High
	Impose conditions prohibiting the keeping of cats and dogs on new residential developments in sites where they are a particular threat to threatened fauna species.		High
	Co-operate with the National Parks and Wildlife Service and other authorities in the development and implementation of a threat abatement plan for feral cat predation in New South Wales.		High

This could have used a “SMART SOLUTION” to control the SAFE NATIVE FAUNA access thru the Rowland Reserve -Unleashed Dog Area. (It appears to have been a HIGH PRIORITY to avoid funding the “Green Infrastructure Project”).

4.

Management issue	Management actions	Responsibility	Priority
Fauna road casualties (3.14)	Identify sites where road casualties pose a particular threat to threatened fauna species in Pittwater. Implement traffic control and/or fauna control measures at these sites.	Pittwater Council	Medium
	Ensure through the development assessment process that new developments include appropriate measures to prevent increased road casualties of threatened fauna.		Medium

This issue is likely “UNSOLVED in 2021 era” so the “Rectification cost can seem more “Significant”.

The Frenchs Forest area could have a “Wildlife Overpass” installed adjacent to the proposed Frenchs Forest Town Centre, to provide a “Safe Fauna Pathway for multiple Native Fauna Species between Manly Dam Bushland Area and Narrabeen Lakes Bushland Areas.

5.

Management issue	Management actions	Responsibility	Priority
Lack of knowledge of threatened fauna and flora (3.24)	Maintain and expand Council's register of threatened fauna and flora records.	Pittwater Council	Medium
	Undertake specific studies and long-term monitoring to improve management of threatened fauna and flora in Pittwater. The first priority are studies of the three listings that are restricted to Pittwater (Pittwater Squirrel Glider population, Pittwater Koala population, Pittwater Spotted Gum Forest).		Medium
	Liaise with the National Parks and Wildlife Service, university researchers and other relevant organisations to encourage and support management-oriented studies of threatened fauna and flora in Pittwater.		Medium

The “Lack of knowledge of Threatened fauna and Flora” has not been solved. Thus a “SMART SOLUTION” is to find an “ALTERNATIVE SOLUTION” including the “Reform of Infrastructure Levy Projects” .

6.

As the native bushland of Pittwater has become more and more fragmented, and the larger areas of bushland more isolated from each other, it has become increasingly important to maintain and re-establish vegetation links between these areas of core habitat. Such links are crucial in order to facilitate and encourage fauna movements. Termed 'wildlife corridors', their role and value is now widely recognised and they have become an important consideration in modern land-use planning (Saunders and Hobbs 1991).

- Plant additional native trees and shrubs on Council lands in high priority wildlife corridors identified in the Habitat and Wildlife Corridors Conservation Strategy:
 - Central Avenue, Avalon Parade, Ruskin Rowe (i.e. the area between Stapleton Park and Angophora Reserve – a critical movement corridor for Koalas).
 - Careel Bay playing fields and environs.
 - Bardo Road to Beaconsfield Street, Newport.
 - Waterview and Mona Streets, Mona Vale, and Bayview Golf Course.
 - Irrawong Reserve and Warriewood Wetlands.
- Encourage similar plantings by other land owners and managers in high priority wildlife corridors.
- Prepare and implement a Development Control Plan for the Conservation of Biodiversity in Pittwater (Pittwater Council 1998) to ensure that future development is compatible with retention of wildlife corridors and, where possible, incorporates measures to enhance and restore corridors.

Clearly the Pittwater Council has “FAILED” to install the recommended SAFE WILDLIFE CORRIDOR between Angophora Reserve and Stapleton Reserve that the Report by SMITH and SMITH identifies as a “Critical Movement Corridor for Koalas by circa 2021.

In 2021 the Northern Beaches Council’s “Gateway Proposal” for Avalon Bowlo Site claimed that the site was NOT near a Critical Threatened Species Habitat Area.

7. + 8.

Section C – Environmental, Social and Economic Impact

- 7. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?**

No. There are no threatened species, critical habitat or ecological communities mapped on the site or within close proximity. The site is developed and used as a bowling green and forms part of Avalon Bowling Club. The Planning Proposal is to rezone the land so it is consistent with the remainder of Lot 7 DP 1240400.

Page 18 of 26

-
- 8. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?**

No. The Planning Proposal will not have any environmental effects. The proposal seeks to rezone the site to ensure it is consistent with the historical and current use of the site and remainder of Lot 7 in DP 1240400.

Clearly the 2000 era Threatened Species Report to Pittwater Council indicates that the Critical Wildlife Corridor can be near the Avalon Bowlo site, or within Close proximity.

So the Sept 16, 2020 Speech in NSW Parliament by NSW Planning Minister, Rob Stokes MP, raises the issue of the “Defective Ecological Solution” in circa 1985 to allow the Proposed Pittwater Palms

Retirement Village project was built, thus “reducing the Tree Canopy of established Forest” that was used as “Movement Corridor for Native Fauna” as indicated in the report in Circa 2000 by SMITH and SMITH (and “accepted by Pittwater Council).

So in 2021 the Northern Beaches Council claims the Avalon Bowlo Site is not affected by the following::

9.

5. Is the planning proposal consistent with applicable State Environmental Planning Policies?

Yes the Planning Proposal is considered consistent with applicable State Environmental Planning Policies (as shown in Table 4), namely:

- **State Environmental Planning Policy (Koala Habitat Protection) 2019**

The SEPP and associated guidelines are to be applied in two ways, being:

1. By councils preparing Koala Plans of Management which forms part 2 of the Guideline,

11



MEETING

ITEM NO. -

2. By landholders and councils when preparing and assessing a development application under part 3 of the Guideline.

The Planning Proposal is consistent with the requirements of the SEPP.

- **State Environmental Planning Policy No. 55 – Remediation of Land**

The site is currently zoned R2 Low Density Residential and caters for sensitive residential land uses. The Planning Proposal seeks to rezone the site to RE1 Public Recreation. Given the current zoning and history of the site, the risk of contamination possibilities is considered low.

Table 4: Compliance with State Environmental Planning Policies (SEPPs)

But in 2000 the SMITH and SMITH report claims that a Recovery Plan for the Listed Threatened Species is in Progress. So “delaying it until 2021” seems WRONG ?

The Australian Govt – Koala Guidelines.

Since European arrival, the size of the koala population and the area it occupies have declined significantly. This has mainly been due to habitat loss and fragmentation, but also as a result of historic hunting practices. In some parts of the species’ range the koala has either become locally extinct or only remains in small, isolated groups.

Today, the impacts of this legacy of clearing and fragmentation are being compounded by further habitat loss and fragmentation, which increases the species’ susceptibility to direct mortality and injury from vehicle strikes, dog attacks, debilitating diseases and the effects of climate change. For the koala to survive and recover, the effects of these threats must be addressed.

What is the purpose of this consultation?

The 3-month public consultation process gives Australians the chance to have their say on the draft plan that sets out the research and management actions necessary to stop the decline, and support the recovery, of the nation's threatened Koalas.

All comments received during the public consultation period will be considered by the Minister for the Environment in making the final recovery plan.

*The National Recovery Plan for the Koala *Phascolarctos cinereus* (combined populations of Queensland, New South Wales and the Australian Capital Territory) (the recovery plan) is made under the EPBC Act. The purpose of this plan is to stop the decline of, and support the recovery of, the listed Koala, so that the chances of its long-term survival in nature are maximised. It is the road map to recovery.*

This recovery plan outlines national actions for the listed Koala at the metapopulation and population level. The national-level approach will identify areas for priority investment and action that will maximise long-term population-level recovery efforts and improve the coordination of state and local-level actions.

Potential benefits and impacts

❖ *Broader biodiversity benefits*

The Koala is an archetypal umbrella species, whereby actions to manage and protect its habitat may likely provide benefits to many other species and enhance ecosystem functions. Vegetation coinciding with the geographic distribution of the listed Koala supports more than 150 other threatened species and ecological communities listed under the EPBC Act.

*Notably, the Greater Glider (*Petauroides volans*) (Vulnerable) and the Yellow-bellied Glider (*Petaurus australis*), and other arboreal mammal species such as possums and bats, as well as forest owls, will benefit, and in turn provide*

ecosystem services such as pollination and pest control. Species that occupy the lower stratum of Koala habitat such as the Southern Brown Bandicoot (Isodon obesulus) (Endangered) and small native rodents, especially those in urban fringes, might benefit from greater protection and reduction of threat from dog attack and vehicle strike. In the more arid landscapes of central Queensland and NSW, a different suite of species of open woodlands also occupies listed Koala habitat, notably nine listed Brigalow Belt reptiles, the Superb Parrot (Polytelis swainsonii) (Vulnerable) and the Grey-headed flying fox (Pteropus poliocephalus) (Vulnerable).

The listed Koala is dependent on large tracts of forests and woodlands across eastern Australia. Revegetation of areas of previous koala habitat currently cleared across these landscapes will provide wider benefits to ecosystems and people by decreasing CO₂ in the atmosphere; reducing the extent and magnitude of drought (McAlpine et al. 2009); increasing connectivity between isolated habitat patches for other species; and enhancing thermal comfort and microclimate conditions for biota as well as humans.

❖ *Social and economic considerations*

The implementation of this recovery plan is expected to have social and economic benefits and costs. As habitat critical to the survival of the listed Koala is identified, proposed activities, including development, may need to be modified and adjusted to reduce the likelihood of a significant impact upon the listed Koala. Measures to assist recovery of this species that involve restrictions on the use or management of land may result in economic impacts to affected industries. Conversely, engaging positively with the sectors may provide benefits in terms of achieving sustainability certification, such as for forestry through forestry industry certification bodies, and 'Koala-friendly' suburbs may be attractive to residents and a way for developers and residents to demonstrate their commitment to sustainable communities and increase the amenity of landscapes.

As an iconic Australian species, enabling the recovery of the listed Koala is likely to assist the tourist industry in terms of providing a positive image of Australia and encouraging visitors to regions where Koalas are recovering, in addition to areas where they currently exist. The recovery of the listed Koala will be an

exemplary representation of broader efforts to manage Australia's environment sustainably into the future.

❖ *Ecological threatening processes*

❖ ***Habitat loss and fragmentation***

Since European settlement, Australia has lost nearly 40% of its forests, with the loss disproportionately occurring on productive fertile soils near to the coast.

This also coincides with high quality habitats for Koala (Bradshaw 2012; Lindenmayer & Fischer 2006; McAlpine et al. 2002, 2006a& b). Since the 1970s, substantial forest loss has occurred in high-density Koala populations of south-eastern Queensland and northern NSW (Bradshaw 2012).

Koala habitat in this recovery plan includes the total set of resources required by Koalas (above) to meet the needs of individual survival and reproduction, and the how those resources are arranged in the landscape to maintain viable metapopulation processes:

For an individual Koala, this includes access to sufficiently quality food and shelter trees to meet their daily energetic requirements and reproduction. Koala habitat includes forests or woodlands; roadside and railway vegetation and paddock trees; safe intervening ground matrix for travelling between trees and patches to forage and shelter and reproduce; and access to vegetated corridors or paddock trees to facilitate movement between patches. These resources fall within individual Koala's home ranges and allow for interaction with adjacent individuals.

3 September 2021

The Secretary
Department of Planning Infrastructure and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Online Submission

Dear Mr Betts

RE: DRAFT FRENCHS FOREST PLACE STRATEGY

I write in relation to the Department's invitation to provide submissions on the draft Frenchs Forest Place Strategy and supporting documents that are currently on public exhibition. We would like to offer the following comments in relation to these documents.

Timing

The strategic work that forms the basis of the draft Place Strategy has been underway for more than 6 years, and it is noted that there can be no meaningful development within the precinct until the Frenchs Forest High School has been relocated and is operational in its new location. To date, there has been no indication as to the timing of the school's relocation. A realistic timetable to implement the Strategy and complete construction needs to include the time required for getting the draft LEP to Gateway, making of the LEP, development approval for the new school, design and construction tendering, relocation of the school, selling the school site, development approvals on the existing Frenchs Forest High School site and construction of the new developments within the Town Centre. It is almost impossible that any new buildings on the school site could be completed in **less than 8 years**.

It will therefore be a considerable period of time until any of the opportunities identified in the draft Strategy for new housing can be implemented. Given the identified need and shortage of supply, particularly of affordable housing and housing for older people looking to downsize but stay in the local area, other opportunities for the provision of these, and other, forms of housing should be being explored and supported by the Department and Northern Beaches Council. Many local residents are not in a position to wait the number of years that it will take to finalise the Strategy, facilitate new housing development and construct the dwellings.

To address this timing constraint, provision of new housing should not be restricted to the precinct identified in the draft Strategy and Council's Structure Plan. Opportunities in the areas immediately

surrounding the precinct should be being explored to create transitions from the high density town centre in a timely manner to cater for the short and medium term housing demand within the LGA.

Provision for affordable housing

A key objective of the draft Strategy is the provision of affordable housing. We fully support this objective as there is a demonstrated need, and a considerable undersupply, for affordable housing within the Northern Beaches LGA. However, it is highly unlikely that the aims set out in the draft Strategy and supporting documents can be achieved in reality, for a number of reasons. In particular, the feasibility of potential developments will be tenuous.

It will not be feasible for sites within the Frenchs Forest Precinct to be redeveloped on the basis of the current affordable housing contribution when also factoring in land cost and infrastructure levies. Land prices within the areas identified to be up-zoned will be considerably higher than in other areas and when combined with a requirement to provide 10% affordable housing and the proposed infrastructure contributions, many sites will be rendered unviable for redevelopment. Hence the affordable housing identified in the Strategy is unlikely to be achieved.

Provision for housing for seniors

While the draft Strategy proposes to plan for aged care (to accommodate approximately 250 beds), this does not provide for the future housing of the many older residents of the Northern Beaches who remain fit and active, but are looking to downsize from large family homes and want to stay in the area.

There is no provision for independent housing for seniors (Independent Living Units), which when designed appropriately, has demonstrated ability to allow people to “age in place” and continue to live in their own homes. ILUs allow for continuum of care to be provided through home care services and packages that can be tailored to meet the specific needs of individuals and this in turn has the ability to considerably reduce the cost of aged care to government, and to ensure that older Australians have choices as to where they live. We note that the Urban Design Report and Public Domain Strategy prepared by CHROFI and Architectus identifies a position on Warringah Road as the appropriate location for aged care. A location on such a busy road, with the associated impacts from noise and traffic, should not be the only choice for housing for seniors.

The Department’s draft Strategy is a perfect opportunity to make strategic decisions and create opportunities for the aged care sector to diversify and increase choice for seniors. Provision should be made for the future development of housing for seniors in locations that are in close proximity to the range of amenities, services and facilities that the draft Strategy is seeking to provide in Frenchs Forest.

For the reasons noted above about the high land prices in the future precinct resulting from up-zoning, developments for seniors housing will not be able to compete with those for residential flat buildings and mixed-use buildings given the specific requirements, such as common facilities and larger apartment sizes, that the developments for seniors have. Appropriate locations must be identified at the strategic planning stage to ensure that this important component of the housing sector is not ignored and effectively “priced out” of the market.

Future Health and Education Precinct

The draft Place Strategy provides that the B7 zoned land to the east of the Frenchs Forest precinct could potentially evolve as a medical-related corporate business park alongside the Northern

Beaches Hospital. We support the idea that this land should be permitted to evolve and encourage the Department to consider that this evolution could provide for a wide range of uses that would support and complement the proposed Town Centre as well as serving the important role of providing for a contemporary business zone which creates employment and space for a mix of uses that could include, but not be limited to modern tech start-ups and small businesses, manufacturing, allied health services, research and development facilities, tertiary education facilities and other specialised services.

With regards to the Frenchs Forest Business Park, our experience and independent research demonstrated the following:

- In 2016 the Business Park contained 6,825 jobs. With the inclusion of the employment targets, this is forecast to increase to between 7,725 to 8,725 jobs by 2036. Assuming an average worker density of 31sqm per worker and a 5% vacancy rate, these jobs would require around 252,080sqm to 284,710sqm of space.
- The existing buildings within the Business Park provide around 415,000sqm of employment space. This is sufficient to accommodate the Business Parks employment targets to 2036, with enough space for an additional 5,895 jobs. **Hence the Business Park could accommodate 3-7 times the base and high strategic employment targets set by Council.**
- It is unlikely that all the sites within Frenchs Forest Business Park would be redeveloped by 2036.
- The Business Park has development potential for between 339,000sqm to 508,500sqm which means that there is an excess in capacity under the base target of between 86,921sqm to 256,421sqm and between 54,289sqm to 223,789sqm under the high target set by Council.

Certain types of accommodation in appropriate locations within this zone should be seen as important to supporting the viability and vibrancy of this sizeable component of the Northern Beaches. While we note that “an aged care facility”, retirement and respite day care are touted as possibilities for this emerging precinct, we believe that this is short-sighted and fails to acknowledge and provide for the future of housing for older people. New models of housing for seniors have the ability to provide for choice and diversity and should be incorporated into the broader Frenchs Forest precinct at this strategic level.

Incorporating housing for seniors in the strategic planning for the future health and education precinct would be in line with the objectives of the new (draft) housing State Environmental Planning Policy and also with international examples of best-practice housing for seniors.

Additional opportunities for the B7 land

The large area of B7 zoned land to the east of the precinct identified in the draft Strategy has been largely excluded from the broader strategic planning undertaken to date by the Department and by Northern Beaches Council. While this land has been identified as “an emerging health and education precinct”, there is little strategic vision.

The position adopted in Council’s LSPS as well as the draft Strategy is one of “no change”. In fact, the LSPS seeks to prohibit hospitals in the B7 zone as a means of restricting housing for seniors in accordance with the *State Environmental Planning Policy (Housing for Seniors and People with a*

Disability). This approach seems contrary to the vision and objectives of a health and education precinct.

Regardless, thorough independent economic analysis of the B7 land should be undertaken to inform the Department's strategic policies for the future of this area. Our own independent economic studies indicate opportunities for a vast number of additional jobs on this land, (3 to 7 times projected demand) when the future uses and the changing nature of employment and work spaces within these traditional business parks is taken into account. International examples show that these traditional business park models are rapidly evolving into places capable of fostering a wide mix of complementary uses (including certain forms of residential) that support vibrant and thriving precincts such as that touted for Frenchs Forest.

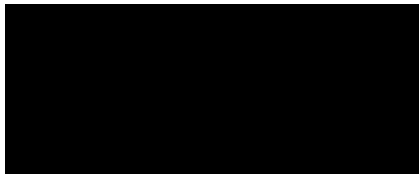
Principles for local planning for Frenchs Forest

One of the principles outlined in Council's Local Strategic Planning Strategy, *Towards 2040*, is to ensure that the Frenchs Forest business park, the Northern Beaches Hospital and the Forestway Shopping Centre function together, and for the town centre to be part of a connected larger centre. Treating each of these areas as a separate precinct with separate planning objectives will not achieve this objective, and further, there is a real risk that a number of functions proposed for the new Town Centre will be duplicated in these other areas – particularly at the existing Forestway Shopping Centre.

A far more integrated and connected outcome could be achieved if the strategic planning approach provides for a transition between these areas. This would allow for uses that are complementary to the hospital and the future town centre as well as to the business park / future health and education precinct to be developed in areas that are located on the fringes. This could potentially provide for a more economical use of these areas of land, and could also provide for an increase in affordable housing because these areas would be more viable to redevelop than land within the Structure Plan area, as outlined above.

Thank you for the opportunity to provide our comments on the draft Strategy. I can be contacted on 0425 285 837 should you wish to discuss any of these comments in further detail.

Yours sincerely



George Revay

Managing Director

Platino Properties

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 9:00:52 PM

Submitted on Fri, 03/09/2021 - 21:00

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████

Last name

██████

I would like my submission to remain confidential

Yes

Info

Email

██

Suburb/Town & Postcode

French Forest 2086

Submission

Thank you for the opportunity to provide feedback on the strategy document.

Overall I support the vision and concepts proposed, the new town center will be a vibrant destination that should be well patronized and the surrounding developments will enhance and create a buffer tapering to the surrounding areas. Those in the general area but are not part of the rezoning will still benefit greatly in my opinion from the proximity to this major infrastructure by enjoying the cafe lifestyle and financially from property values increasing.

Reading the series of "Big Moves" 1 through 5, what I would like to understand is the overall timing proposed for all the redevelopment and what stages are dependent on others if at all.

In particular are the development areas to the North and South of the town center - linked at all or is the plan that these achieve Gazettal some time in 2022 and development applications can proceed to construction from that point? I would sincerely hope this is the case for as beneficial financially the rezoning may be when it eventuates there are a lot of folks whose lives have been on hold for more than 7 years and counting knowing that any major repairs, improvements are essentially wasted investment, you just need to see the state of the gardens, roofs and paintwork that got decimated from the dust and debris due to 18 months of roadwork.

Thanks again for the opportunity and look forward seeing these plans come to fruition!!

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 9:09:30 PM

Submitted on Fri, 03/09/2021 - 21:09

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Eleisha

Last name

Ford

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

FRENCHS FOREST

Submission

The proposal could be better planned.

1. There appears to be too many buildings in the Town Centre (School site). There is too much bulk.
2. Some of the buildings of the Town Centre will block the northern views and sun
3. The medium density housing along Frenchs Forest Road West will: (i) obstruct views to the north from the Town Centre; (ii) impact privacy to the properties located downhill and (iii) cause traffic congestion in the narrow side streets
4. More open space / gardens should be provided
5. Cafes and shops should be located within the Town Centre, not along busy roads
6. More recreational facilities should be provided. There should be opportunities for community building. The community could plant food for the community. Funds could be used for community projects.
7. Be innovative, line the streets with beautiful orange, mandarin and lemon trees, plant an orchard, make it colourful... then it will be a vibrant community!

I agree to the above statement

Yes

To whom it may concern,

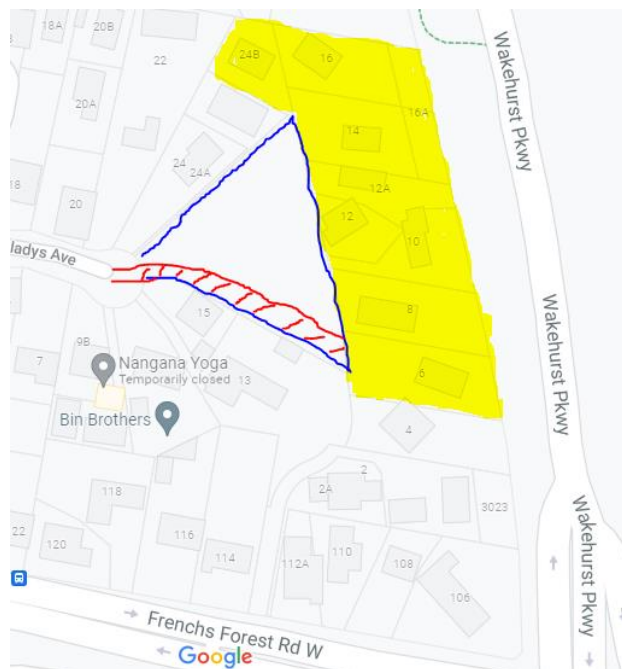
[REDACTED]

The draft 'Frenchs Forest 2041 Place Strategy' provides an overview of the proposed re-zoning of our area, and highlights that the houses facing Frenchs Forest Road West will be re-zoned to R3 Medium Density Residential (up to 4 Wakehurst Parkway).

Our submission would like to raise our concerns regarding access for those ten houses that are not included in the re-zoning, specifically the potential impacts to [REDACTED] access and waste collection to the 'Right of Way' from any new developments that arise due to the re-zoning. If these impacts are not addressed, the amenity of these ten houses will be significantly impacted. .

We would encourage the Department of Industry and Environment (DPIE) to look at different access options for these houses to reduce potential impacts. A suggestion is using parcel of council-owned land that connects these houses to Gladys Avenue, thereby changing access from Frenchs Forest Road West to Gladys Avenue.

Please find a screen shot of a suggested new access route below (the houses impacted by the proposed plan are in yellow, the council-owned land connecting these houses to Gladys Avenue is outlined in blue, and a possible access route is outlined in red).



We look forward to discussing these options with DPIE and Northern Beaches Council further as this plan develops.

Kind regards,

[REDACTED]

3rd September 2021

Department of Planning Infrastructure and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sir / Madam

RE: DRAFT FRENCHS FOREST PLACE STRATEGY

I write in relation to the Department's invitation to provide submissions on the draft Frenchs Forest Place Strategy and supporting documents that are currently on public exhibition. I would like to offer the following comments in relation to these documents.

Commentary

Relationship with the B7 Zone.

Firstly, by way of introduction, my organisation assists with the Jardin Frenchs Forest site at 5 Skyline Place in the B7 zone approximately 250 metres from the proposed town centre. For the information of the department there is an extraordinary demand from the local community for seniors housing who are being denied appropriate accommodation due to the resistance of council / departments to seniors housing in this permissible zone.

In relation to the second stage application of this project the council has sited the Frenchs Forest Place strategy as a reason for refusal for the DA, essentially placing this strategy a higher priority over the Seniors Housing SEPP. This is in contradiction to the seniors housing current SEPP which states

"Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency"

The feedback therefore is as follows:

- Seniors Housing, affordable Housing and disability housing should not be placed 'on hold' until this strategy is on the ground and completed. I appreciate the DPIE wanting the strategy to work but it should be not be at the expense of elderly or disadvantaged groups who will benefit significantly from the current effective immediate opportunities.
- The allocation for specific seniors housing in town centre is very minimal is on the main road and does not clearly state how it will be made affordable or how to compete with residential land
- Like the new Housing SEPP on exhibition there is the perception that ILU's are more similar to residential flats and aged care seniors housing is the priority. In my opinion well designed ILU's with community services are an excellent offering to give local seniors the best chance of not entering aged care which the royal commission made abundantly clear was an absolute last resort.
- Clear timeframes need to be communicated on timeframe to completion
- While the draft Strategy proposes to plan for aged care (to accommodate approximately 250 beds), this does not provide for the future housing of the many older residents of the Northern Beaches who remain fit and active, but are looking to downsize from large family homes and want to stay in the area. There is no provision for housing for seniors, which when designed appropriately, has demonstrated ability to allow people to "age in place" and continue to live in their own homes. This in turn has the ability to considerably reduce the cost of aged care to government, and to ensure that older Australians have choices as to where they live.

- Proposal shows seniors in bad location facing busy road

Future Health and Education Precinct would be an excellent outcome

The B7 zone can clearly accommodate significant more GFA in the approx. 600,000sqms of land in the area – approximately 3-7 times the GFA that currently exists today.

It is my strong opinion that the B7 land component **could form an excellent health and education precinct** anchored by seniors housing, aged care, disability, affordable housing around a large tertiary university. In my previous role as Head of Development at Lendlease, I was responsible for the University of Wollongong (UoW) Innovation Campus PDA, Research agreement and collaboration agreement. Please see below links to this concept. I believe this would be an excellent compliment to the town centre and aligns with current approval in the area as at August 2021:

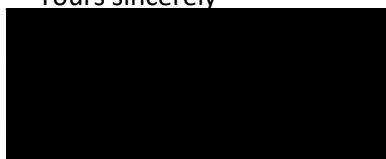
- Genesis Cancer Centre
- Private Hospital
- Seniors Housing
- Parkway Hotel and Serviced Apartments
- Bunnings

Click here for [University of Wollongong Health and Education Precinct](#)

International examples clearly demonstrate that where **social** (disability) housing, **affordable** housing and **senior's housing come together into a fully integrated complex** opportunities exist that extend beyond accommodation for all members of this community. This model creates a deliberate mixing of residents, in terms of health status and socio-economic status. Some of the residents will be in good health, physically active and able to live independently. Others might be older and less mobile. Other may wish to volunteer. A disabled resident may assist a less mobile senior on a daily walk in the garden or obtain employment in the development. They may be the opportunity to be a caregiver for some of the affordable housing residents.

I would welcome the opportunity to meet with the department directly, in person, to discuss this submission. I am passionate about the area and in particular the vision for a true health and education precinct and would be more than happy to discuss my experience with UoW.

Yours sincerely



Simon Militano

SALA Solutions Pty Ltd

**Background of the author:**

Relevant experience in the Seniors Housing Sector:

- 24 years' experience across multiple business disciplines and asset classes including 15+ years in Retirement Living and Aged Care.
- 20+ years at ASX listed Lendlease and as an Executive Team member (since 2014-2019) of the largest owner and operator of Retirement Living in Australia comprising more than 12,500 units, that are home to 16,500 residents across 71 existing retirement villages

-
- Head of Development encompassing a team of 74 staff across Australia and 14 new developments in various forms of acquisition, planning, conversion and delivery. Responsible for the sale of over 2,000 new retirement living units.
 - Led the University of Wollongong (UOW) - Project Delivery Agreement (PDA) which is a \$500 million masterplan project and Australia's first university-based retirement community which will feature Retirement Living, Aged Care, Child Care, Primary Health & disability housing.

UoW Project Announcement Video Professor Alison Jones, & Simon Militano

- Member of Retirement Living Property Council 2017-2019 and Chair of the Planning Sub-Committee

Selected documents that may be of interest

1. Zinnia Living Benefits of Homecare in the one location download [here](#).
2. The Netherlands Example – The Apartments for Life downloaded [here](#).
3. Social Impact Report Jardin Frenchs Forest Deputy Chancellor of Canberra University, can be downloaded [here](#).
4. Royal Commission Into Aged Care Executive Summary report can be downloaded [here](#).

Submission on the Frenchs Forest Place Strategy

September 2021

About Shelter NSW

Shelter NSW is a non-profit organisation that conducts housing research and advocacy on behalf of households on ordinary incomes — those in low- and moderately-paid work, in casual or part-time employment, or getting by on government support payments. We were founded in 1975 as a member-based organisation that today represents a diverse network of other organisations and individuals who share our vision of a sustainable housing system that provides a secure home for all. To advance our vision, we engage our members, experts, and partners and advocate on housing reforms that aim to benefit our economy, our society, and our environment. One of our primary aims is to find a way to mitigate the growing impact of housing inequality across our cities and towns.

About our submission

Shelter NSW (Shelter) appreciates the opportunity to comment on the [draft Frenchs Forest 2041 Place Strategy](#) (the Strategy), prepared by the Department of Planning, Infrastructure and Environment (DPIE). Shelter's ongoing review of the planning system has presented evidence that the private housing market and the majority of existing planning mechanisms are failing to deliver housing solutions that address the housing requirements of security, affordability, choice and amenity. It is for this reason that we have reviewed the Strategy from the perspective of people living and working in and around Frenchs Forest who struggle to afford good quality housing that suits their needs, including the large number of key workers that will be working onsite in the future and those in need of social housing.

Our submission is primarily focused on ways to address the needs of that percentage of the population who don't own a home - residents who are struggling to meet their housing costs. We will therefore be raising some key concerns with the Strategy and proposing some areas of further investigation that will help to address the housing shortfall. With this as our focus, we will advocate ways to address the growing problem of declining housing affordability across greater Sydney and NSW.

If you wish to discuss our submission in more detail, please contact Stefanie Matosevic on 0431 037 724 or by email at stefanie@shelternsw.org.au or our CEO, John Engeler, on 02 9267 5733 or by email at john@shelternsw.org.au.

Sincerely Yours,



John Engeler
Chief Executive Officer, Shelter NSW



Stefanie Matosevic
Policy Officer, Shelter NSW



Housing Affordability in Frenchs Forest

The Frenchs Forest Place Strategy has been prepared to guide the transformation of Frenchs Forest into a key mixed-use strategic centre. The Northern Beaches Hospital, relocation of Frenchs Forest High School, and investment in infrastructure and transport are catalysts for Frenchs Forest to be a major health and education precinct.

In recent years, housing affordability in the suburb has declined due to its desirable location and attractive place character, which has seen lower-income families and singles increasingly priced out of the area. The median rent in Frenchs Forest is currently \$630 per week for a 2-bedroom dwelling¹, compared to \$500 in Greater Sydney². Additionally, social housing availability is low in the area relative to the rest of Sydney³. This is despite there being 744 households waiting for social housing in the CS05 Northern Beaches zone, including 174 which are considered priority i.e., in urgent need of housing⁴. The minimum wait on social housing is 5-10 years, and 10+ years for anything larger than a 4-bedroom dwelling.

This has led to an increasing demand for more social and affordable housing in the local area, as described in the Northern Beaches Local Housing Strategy⁵. Council has identified a current shortfall of more than 8,000 social and affordable housing dwellings, which is expected to increase by another 1,880 by 2036 (pp. 78-80).

The new Frenchs Forest High School will be a state-of-the-art public school. For people with young families, this makes the area even more attractive and people on higher incomes will buy into the area to access the school, placing additional pressure on housing prices. This will, in turn, see lower-income families further displaced.

Furthermore, the Northern Beaches Hospital and new high school will see a rise in the number of key workers in the area. Research undertaken by the Australian Housing Research Institute⁶ examined the housing situations and commuting patterns of key workers in Sydney and Melbourne. It found that appropriate and affordable housing is increasingly difficult to access for workers not only in the first and second quartiles of income (those traditionally considered 'low income'), but also increasingly for those in the third quartile. More specifically, the research found that no LGAs in metropolitan Sydney, Wollongong or Newcastle had a median house price that is affordable to an early career registered nurse.

¹ [Realestate.com.au, August 2021](https://www.realestate.com.au/property-rental/2-bedroom-rental/2-bedroom-rental-2021-08)

² [Tenants Union, August 2021](https://www.tenantsunion.org.au/rental-market-reports/rental-market-reports-2021-08)

³ [Department of Communities and Justice Rent and Sales Statistics, March 2021](https://www.dca.nsw.gov.au/communities-and-justice/rent-and-sales-statistics/march-2021)

⁴ [Department of Communities and Justice Expected Wait Times, June 2020](https://www.dca.nsw.gov.au/communities-and-justice/expected-wait-times/june-2020)

⁵ Northern Beaches Council. (2021). Draft Northern Beaches Local Housing Strategy. Retrieved from <https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Common/Output/LoadGenWebDoc.ashx?id=PIDEAanAopIV0A60ki4OEg%3d%3d>

⁶ Gilbert, C., Nasreen, Z. and Gurran, N. (2021). *Housing key workers: scoping challenges, aspirations, and policy responses for Australian cities*, AHURI Final Report No. 355. Australian Housing and Urban Research Institute Limited. Melbourne. <https://www.ahuri.edu.au/research/final-reports/355>, doi:10.18408/ahuri7323901



Recognising the growing costs and increased housing pressures for local residents, Northern Beaches Council have been proactive in advocating for action and solutions to housing affordability in the area. The Frenchs Forest Precinct has a key role to play in the availability of secure and affordable housing for a growing number of residents in the Northern Beaches.

Shelter NSW comments and recommendations

Overall support for affordable housing targets

Shelter NSW strongly support the inclusion of 10-15% affordable housing in the Frenchs Forest precinct, which will deliver up to 250 affordable dwellings and help to deliver more housing close to critical employment hubs. However, we believe that this should go further, given the decline in housing affordability in the Northern Beaches and the fact that there are few opportunity sites to increase social and affordable housing supply.

We also wish to raise the issue of inconsistent affordable housing targets across Sydney. While we support a 10-15% target in Frenchs Forest, we would like to see this target across Greater Sydney, which would increase the amount of affordable housing across the city, while also providing greater certainty to developers.

Confirm that affordable housing will remain affordable in perpetuity

We request the DPIE clarify whether the affordable housing delivered on site in Frenchs Forest will remain affordable in perpetuity. We recognise that the Housing SEPP requires affordable housing to remain so for a minimum of 15 years, however we also note that the development in Narrabeen has affordable housing dedicated to council in perpetuity.

Shelter strongly believes that all new affordable housing must remain affordable in perpetuity. We are concerned that by placing time limits on affordable housing, any meaningful and much-needed increase in the supply of genuine affordable rental dwellings will be difficult to achieve, and NSW will continue to suffer from a critical undersupply of affordable rental housing. We would also like to highlight the risk of displacing affordable housing residents once the dwellings revert to market housing, which we are beginning to witness as the National Affordability Rental Scheme comes to an end⁷.

Shelter urges DPIE to ensure affordable housing remains so in perpetuity, to align with the NSW Government's own commitment to retaining existing affordable housing and increasing affordable housing supply.

Recommendation: Include a clearly stated commitment that all affordable housing delivered in Frenchs Forest will remain affordable in perpetuity.

⁷ Pollard, E. (2021, April 28). Fears Australia's housing crisis will worsen as affordable rental scheme winds down. ABC News. Retrieved from <https://www.abc.net.au/news/2021-04-28/homeless-rise-nras-affordable-rental-scheme-ends/100097588>



Opportunity to increase the provision of social housing

Shelter believes that every neighbourhood should have a supply of social housing to support those that are unable to access the private rental market. Whether it be loss of income or a dramatic

change in personal circumstances - including people escaping domestic violence, retirees that do not own their own home (particularly single women over 55), or someone that has had their income severely impacted by COVID-19 - all communities need a stock of social housing.

We therefore believe that an appropriate proportion of social housing should be delivered in the Frenchs Forest Precinct.

Recommendation: Commit to a minimum of 10% social housing

Consider increasing affordable and social housing targets on publicly owned land

Shelter strongly believes that publicly owned land should be leading the way in the delivery of social and affordable housing in NSW. We recognise that the cost of land represents a large proportion of the cost of development, especially in Sydney. Partnering with developers to deliver social and affordable housing on public land can significantly improve its financial feasibility and ultimately, can provide low- and middle-income families with access to secure, safe, and affordable homes^{8,9}. This strategy can provide NSW with strong, sustainable contributions to social and affordable housing.

The relocation of Frenchs Forest High School provides a key opportunity to better leverage land owned by the Department of Education. The NSW Government's lack of engagement with this common strategy calls into question their commitment to improving access to more affordable housing. It is for this reason we request that the Strategy be reviewed to increase the proportion of social and affordable housing on Site A, the site of the existing Frenchs Forest High school.

Recommendation: Investigate the opportunity to increase the affordable housing target from 15% to 20% and deliver up to 10% social housing on Site A.

Thank you

Shelter NSW appreciates the opportunity to comment on the draft Macquarie Park Place Strategy. We hope that the comments and insights we have provided bring some value to considerations in the housing policy space. We are also happy to engage on the issues raised in our submission. If you wish to discuss our submission in more detail, please contact our CEO, John Engeler, on [REDACTED] or by email at [REDACTED], or Stefanie Matosevic on [REDACTED] or by email at [REDACTED].

⁸ Spotts, M.A., Hale-Case, G. and Abu-Khalaf, A. (2017). Public Benefit from Publicly Owned Parcels: Effective Practices in Affordable Housing Development. Enterprise Community Partners, Maryland, USA. Retrieved from <https://www.enterprisecommunity.org/download?fid=3257&nid=3739>

⁹ Palm, M., Raynor, K. and Whitzman, C. (2018). Project 30,000: producing social and affordable housing on government land. University of Melbourne, Melbourne. Retrieved from <https://apo.org.au/node/251431>



Frenchs Forest Town Centre Proposal - *Submission*

AIM: To protect the environment and public health

Concern 1:

The Town Centre could be better designed.

- a. The buildings, especially cafes and restaurants should be 'solar designed' to face north.**
This will create a more enjoyable place for the community.
- b. A 'Community Garden' should be provided.** Everyone should have access to a garden, especially those who live in the affordable housing within the precinct. Gardens promote wellbeing and harmony which reduces crime.
- c. The soils within Frenchs Forest are fertile and should be protected.**
A community garden could help to prevent loss of this valuable resource.
Vegetables and fruit could be sold on location at a monthly market.
- d. More open space and recreational areas should be provided.** Amphitheatre's, Splash Parks and Community Gardens are highly valued by communities.
A hill and cafés overlooking an amphitheatre would provide easy viewing for watching performances or enjoying the views and winter sun.
**These areas should not be obstructed by buildings.*
**Parramatta Park has an excellent amphitheatre which has been providing family friendly community concerts for many years.*

Concern 2:

The medium density development (along the ridge of Frenchs Forest Rd West) will create a negative impact on the existing and future amenity of the area.

The proposed medium density housing will:

- a. Block views from the Town Centre, restaurants and recreational areas.**
The Town Centre should be a place where people can go to relax and enjoy the northern sun and views.
- b. Impact privacy of the adjoining residents,** who are located downhill from the development.
- c. Obstruct traffic flow / cause congestion** within the 'narrow' streets of E.g., Blue Gum Crescent.

- d. **Size and bulk** of the medium density housing (especially along the ridgeline) will be **obtrusive** and **out of character**.
- e. There is an **opportunity to create a safe and healthy community** by planning shops and services away from busy roads.

Concern 3:

Two new roads are proposed to enter the 'Town Centre Precinct from Holland Crescent'.

One of the roads will be a **major entry point into the 'Town Centre'**. However, **Holland Crescent, is not scheduled for medium density development until Stage 2.**

The Holland Crescent enclave is centrally located and well suited to development because it is **buffered by vegetation and major roads**. This will prevent impacts to surrounding areas. It is also located **downhill** from the Town Centre so it will **not obstruct views**.

This beautiful area could be enjoyed by all, if Street level cafes and / or rooftop 'garden' restaurants are included within the medium density housing proposal.

Development in this area should go ahead in Stage 1.

*The area needs more housing and up graded services and shops. Delaying this further is not in the **community interest**.*

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 11:23:57 PM

Submitted on Fri, 03/09/2021 - 23:23

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Wasseem

Last name

Williamson

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

FRENCHS FOREST NSW 2086

Submission

Online Submission Regarding: The draft Frenchs Forest Place Strategy

To Whom it may concern,

I am a home owner and resident in Gladys Ave.

I support the Frenchs Forest Place strategy as it will provide much needed housing and amenities in close proximity to the Hospital and Future Town Centre.

Of key importance is providing diversity of housing supply in close walking proximity to the Hospital. This includes additional low density housing.

I suggest that the proposed minimum lot size of 255m2 (as detailed in page 15 of the Explanation of Intended Effects) be applied to both sides of Gladys Ave.

Gladys Ave is located in very close walking proximity to the hospital and future town centre. It is particularly convenient as the street is quite flat as opposed to surrounding streets which are quite steep and would increase the reliance on cars.

Reducing the minimum lot size of the properties on the Northern Side of Gladys Ave will help council achieve its target for additional dwellings whilst maintaining the existing low density R2 zoning. It will also help create much needed housing diversity and more affordable single dwelling accommodation in close proximity to the hospital and proposed town centre

Thank you for your consideration of my submission.

Sincerely,

Wasseem Williamson

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 11:34:10 PM

Submitted on Fri, 03/09/2021 - 23:33

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Kathryn

Last name

Realf

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

2086

Submission

Dear Sir / Madam,

I make this submission regarding draft Frenchs Forest Place Strategy (Draft Strategy) and the accompanying Explanation of Intended Effects prepared by the Department of Planning, Industry and Environment.

I am a home owner in Gladys Avenue and am generally in support of the Frenchs Forest Place Strategy, however I note that the revised draft Strategy significantly reduces the proposed number of dwellings from what was previously exhibited.

I propose that the minimum lot size of both sides of Gladys Avenue be made consistent and reduced to 225m² for the following reasons:

1. Gladys Ave is located in very close vicinity to the hospital and provides opportunity for a relatively flat and easy walk to the hospital (surrounding streets are very steep and not as easily accessible on foot).
2. A consistent minimum lot size being applied to both sides of the street would help ensure a more similar future street character whilst maintaining the existing HOB and Zoning controls to the Northern Side of the street.
3. It will help NSW Planning and Council achieve the dwelling targets whilst maintaining the existing low density R2 zoning.
4. It would also help create greater diversity of housing and more affordable housing options in close walking distance to the hospital and proposed town centre.
5. This will help achieve a more consistent street character and reduce the severity of the density change between the two sides of the street.
6. It will help preserve the economic value of the properties on the Northern Side of Gladys Ave, which will be negatively impacted by the rezoning of the Southern Side to High Density whilst maintain R2 low density to the Northern Side with no uplift whatsoever.
7. The proposed reduction in minimum lot size would be more equitable to both sides of Gladys Ave.

Yours Sincerely,

Kathryn Realf
16 Gladys Ave, Frenchs Forest

I agree to the above statement

Yes

Proposed 'Frenchs Forest Town Centre'

Please consider the following points

1. Medium density along Frenchs Forest Road West (ridge) will block views to the north.
It would be nice to sit in a café in the warm winter sun overlooking the trees and hills.
2. It appears that the cafes in the proposal will face west. This will be very hot in summer.
3. The narrow streets will not cope with the extra traffic from the medium density housing that is proposed for Frenchs Forest Road West and side streets.
4. The residents downhill from the development along Frenchs Forest West and adjacent side streets will suffer from privacy loss, as the proposal will overlook their houses.
5. The medium density housing along Frenchs Forest Road West (ridge) will look out of character.
6. Shops and services should not be located along busy roads. This creates traffic congestion, accidents and air and noise pollution.
7. The Town Centre proposal looks over developed.
8. An amphitheatre should be provided, with cafes, restaurants, and a hill (facing North). This would provide a good viewing platform to watch performances and enjoy the distant views.
9. The Town Centre should be a focal point for recreation and community building.
10. There is an opportunity to make something great.

Please ensure it is well planned

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 11:39:14 PM

Submitted on Fri, 03/09/2021 - 23:39

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

■

■

I would like my submission to remain confidential

Yes

Info

■

Suburb/Town & Postcode

2086

Submission

Frenchs Forest Town Centre Precinct

- The development should be spread out more. There are too many buildings within the Town Centre, that is, the present School site. Some of these buildings obstruct views and the northern sun from the recreational areas, e.g., cafes.
- The medium density housing along Frenchs Forest Road West will obstruct views, impact privacy to the properties located downhill and cause traffic congestion in the narrow streets.
- Place shops in the Town Centre, not along busy roads
Shops and other services should not face major roads. It is too dangerous for pedestrians, especially children and hazardous because of air and noise pollution.
- More recreational facilities should be provided (e.g., an open-air stage, bike tracks that are not along a busy road, children's playground /splash park and a dog park - the existing dog parks are overcrowded and not safe.
- We need more housing, shops and services. I hope we do not have to wait too long!

I agree to the above statement

Yes

Online Submission

Regarding: *Draft Frenchs Forest Place Strategy*

Attention: Department of Planning, Industry and Environment

To Whom It May Concern,

In Principle I strongly support the Draft Frenchs Forest Place Strategy.

The state led rezoning will produce much needed economic activity, housing and amenity that will support the hospital, its staff as well as residents of the area. This Strategy is highly anticipated and very much welcomed.

We note that the proposed strategy reduces the number of new dwellings from what was previously proposed.

We note that the Frenchs Forest Place Strategy proposes to reduce the minimum lot size from 600m² to 255m² (as per the below extract taken from page 15 of the Explanation of Intended Effects). We are very much in support of this.

Other site-specific provisions

- Permitted development occurs in accordance with the Frenchs Forest Place Strategy;
- Development applications within the Frenchs Forest Precinct that are not minor in nature are not determined prior to a site-specific development control plan being prepared and in place;
- A new site-specific provision will allow an exception to the minimum subdivision lot size for attached dwellings and semi-detached dwellings in limited circumstances. Currently, the minimum subdivision lot size for the Precinct under the Warringah LEP is 600m², which limits opportunities for the subdivision of attached dwellings and semi-detached dwellings, where they are developed in accordance with the proposed controls in this EIE.

This provision aligns with the minimum site area controls outlined above, and would allow subdivision below the minimum subdivision lot size provided in clause 4.1 Minimum subdivision lot size of the Warringah LEP when:

- the development is for the purpose of semi-detached dwellings or attached dwellings on **Site B only**
- a single development application for both the residential land use and subdivision is submitted
- the minimum subdivision lot size for a semi-detached dwelling or attached dwelling is not less than 225m².

The proposed reduction in minimum lot size presents a great opportunity to increase the number of dwellings as well as the housing diversity and housing affordability in close walking vicinity to the Hospital without having to rezone any more land. This could be achieved by reducing the minimum lot size of both sides of Gladys Ave to 225m².

Recommendation (for Northern Side of Gladys Ave / Even numbers):

1. Reduce the minimum lot size of all properties fronting Gladys Ave to 225m²
2. Maintain the existing low density R2 zoning
3. Maintain the existing HOB of 8.5m

Benefits of the recommendation:

1. Increased housing diversity and affordability within close walking distance of the hospital
2. Help achieve dwelling targets without having to rezone additional land
3. Improve street character (greater consistency and better transition across both sides of the Gladys Ave)
4. Greater utilisation of prime (accessible) land within close walking distance of the hospital (Gladys Ave is the only street that is accessible to people with limited mobility on foot from the hospital as the surrounding streets are very steep)
5. Maintain land values to the Northern Side of Gladys Ave, which would otherwise be adversely affected by the rezoning of the southern side from low density to High Density Housing. This would allow options to the existing owners who are distressed by the High-Density Buildings that are proposed to be built in a quiet cul-de-sac street that is used to having single storey and double storey dwellings.

The above proposal is in the public interest and we hope that it can be considered and adopted.

Please don't hesitate to contact me should you have any queries or require any further information.

Thank you.

Your sincerely,

Michael Williamson

Managing Director & Development Manager



Date: 3rd September 2021

RE: Frenchs Forest Precinct Plan

Save Manly Dam Catchment Committee (SMDCC) would like to reserve the right to raise concerns about the location of the Frenchs Forest High School. There is no detailed documentation.

We note the following:

- The draft Frenchs Forest 2041 Place Strategy document provides very little information on The Forest High school, other than the proposed location. (p17 shows the map but no further information or plans.)
 - ➔ What other documents will become available?
 - ➔ We would request there be an environmental assessment of the site.
 - ➔ None of the Technical studies have been written after 2018 so do not provide any information on the impacts from the High School development.
- The chosen site adjoins a Biobanking site on the western boundary. This can not be used as an APZ and must be protected.
- The traffic studies are out-of-date, and, as per letter from Jacobs dated November 12, 2020, do not consider the relocated High School.
- Whilst we do not object to the proposed educational use, the impact depends on the intensity and extent of development.
- Some of our concerns for such a development on the edge of the Manly Warringah War Memorial State Park are as follows:
 - Both the FF Precinct Plan and FFHS will put increasing pressure on the Park.
 - The height of buildings could detract from scenic views within the Park. This is referred to in the 2014 MWWMSPP Plan of Management.
 - Significant environmental issues need to be managed in construction and operation.
 - The DCP identifies the site as a wildlife corridor - considerations will need to be given to vegetation and habitat and potential for threatened species.
 - The DCP plan requires retention of 50% open space.
 - Analysis of the direct / indirect impacts associated with a High School of over 1000 students.
 - The need for an APZ for the school will have a significant impact on the surrounding bush.

Our previous experience with a school development in or near the Catchment was Manly Vale Public School in 2017. This development continues to have drainage and runoff problems for residents in nearby streets. The clearing for the APZ has caused considerable damage to the bush which is now exacerbated by Mountain bikes regularly creating their own tracks in the reduced bush covering.

Some further considerations are:

ENVIRONMENT & LAND USE ISSUES regarding relocation of the school.

- There is no mention of the environment and land use constraints of this site.
- The area proposed for the new high school is much smaller than the existing site.
- The site has limitations for a large high school and there is little scope for expansion.
- The high school will be in close proximity to Manly Warringah War Memorial State Park.
- Increased impacts on the Park's natural areas associated with increased intensity of use.
- Increased resources will be required to manage the conservation values of the Park.
- The land is located in Manly Dam Catchment which is not suitable for intensive development.
- This includes expansion to provide additional facilities to cater for an increase in population.
- High rise buildings on this site would be visible from within Manly Dam Reserve. From POM "Development is to be designed to ensure that long distance views of the land are not dominated by the built form."
- Flooding and stormwater assessment seems inadequate for a Catchment area. A NORBI approach would be requested. *(From p48. Flooding and stormwater assessment study: Mainstream flooding is unlikely, with potential for only minor flooding of residential properties north of Frenchs Forest Road. The existing drainage easement will need to be maintained and stormwater pipe upgrades may also be needed. Council's flood planning controls are appropriate and Council's gross pollutant and nutrient limits can be met using at-source treatment as development proceeds.)*

We ask that the State Government and the Council ensure appropriate conditions are imposed to protect the environment, so that it can be managed sustainably in the future.

We need further analysis to be done in order to provide adequate feedback on the proposal.

Regards,

Ann Collins
per Save Manly Dam Catchment Committee
savemanlydamcc@gmail.com

Some important references:

[DCP - Landscaped Open Space and Bushland Setting 50% of the site](#)

DCP East to West Wildlife corridor (E4)

DCP Native vegetation (E5)

BIOBANKING SITE adjoins western boundary.

Bushfire prone land [Northern Beaches Bush Fire Prone Land Map. Certified 7 August 2020](#)

DCP Landscaped Open Space – 50% of the site (D1) [DCP - Landscaped Open Space and Bushland Setting 50% of the site](#)

DCP – F3

[F3 SP1 Special Activities](#) (Warringah Development Control Plan » Part F Zones and Sensitive Areas)

From p48. Flooding and stormwater assessment study: Mainstream flooding is unlikely, with potential for only minor flooding of residential properties north of Frenchs Forest Road. The existing drainage easement will need to be maintained and stormwater pipe upgrades may also be needed. Council's flood planning controls are appropriate and Council's gross pollutant and nutrient limits can be met using at-source treatment as development proceeds.

Facilities for People with a Disability, Allambie Heights

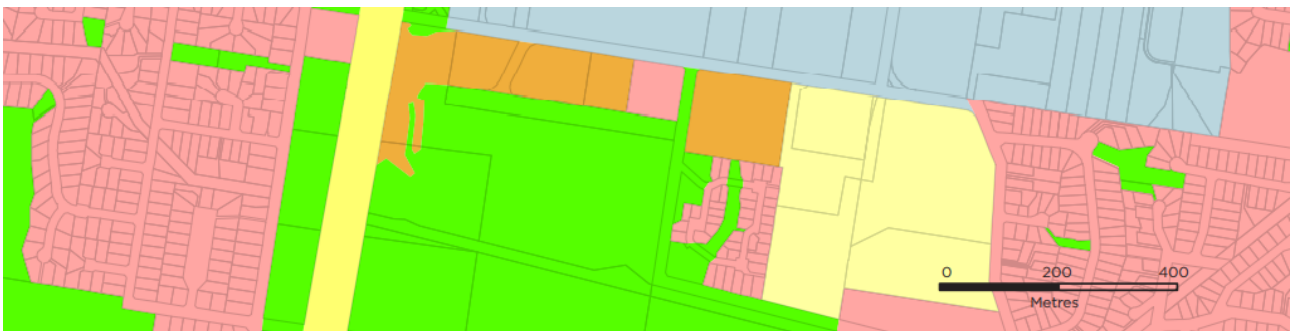
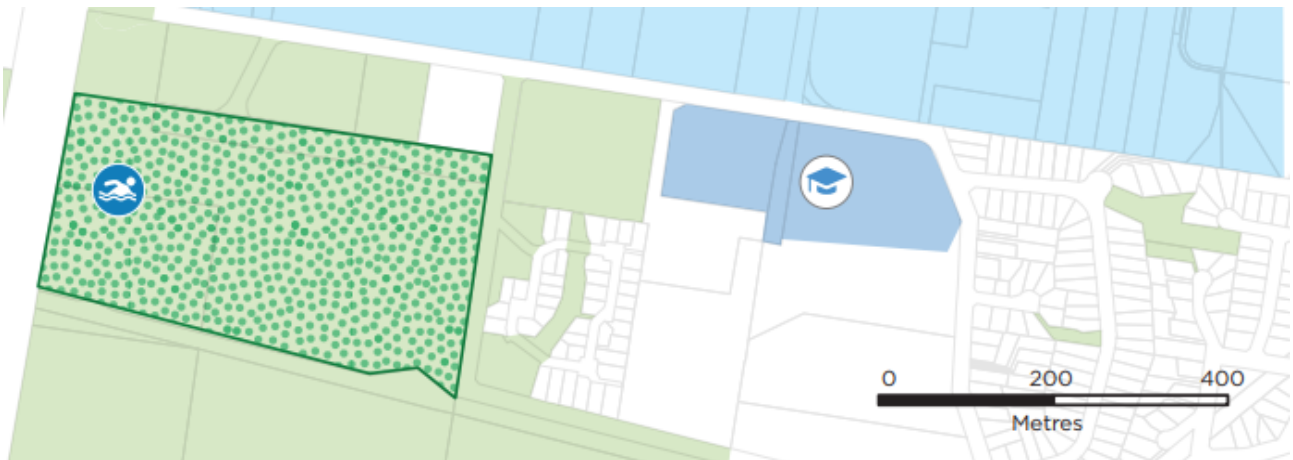
The site is characterised by various buildings and associated car parking areas interspersed by landscaping and occasional remnant [bushland](#). Development is to be sited and designed to ensure impacts upon the nearby residential areas are minimised.

Future development will ensure that the relationship of the site with district [bushland](#) is reinforced by protecting and enhancing the spread of indigenous [tree](#) canopy and preserving the natural landscape, including rock outcrops and remnant [bushland](#). New landscaping works are to comprise predominantly locally indigenous species.

Development is to be designed to ensure that long distance views of the land are not dominated by the built form. The texture, colour and design of new development is to complement the existing [bushland](#) within and around the land.

Development is not to compromise the viability of threatened or potentially threatened species populations or habitats. Potential "edge effects" of development on these species, communities, populations and/or habitats are to be minimised and managed.

Development is to include measures to minimise the potential [adverse impacts](#) upon the water quality of the Manly Dam. Existing creeks and natural watercourses are to remain undeveloped and are to include a [riparian buffer](#) zone comprising appropriate vegetation.



Land Zone

B1 Neighbourhood centre	R2 Low Density Residential
B2 Local centre	RE1 Public Recreation
B7 Business Park	SP1 Special Activities
DM Deferred Matter	SP2 Infrastructure
E2 Environmental Conservation	

Big Move 1

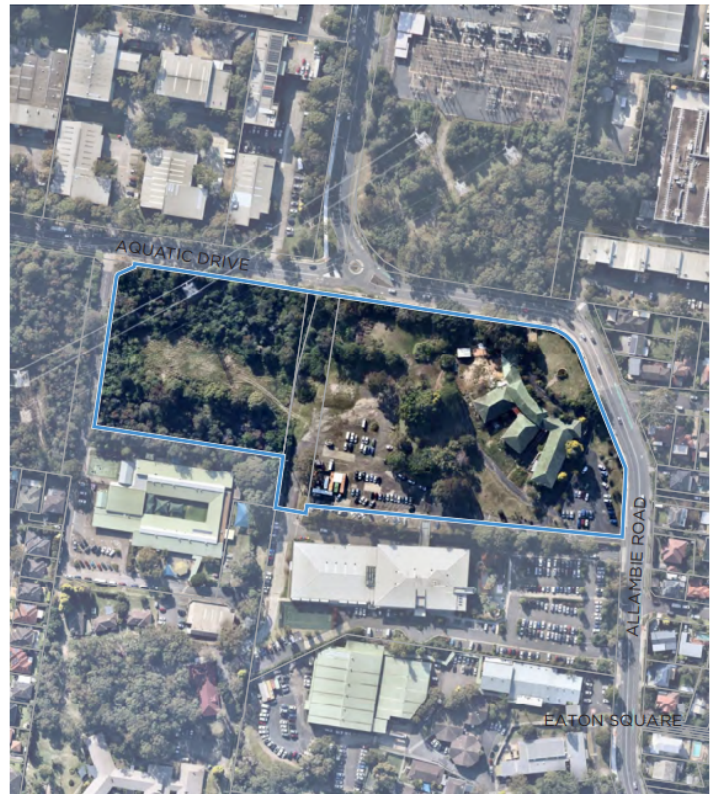
Relocate and construct a new high school

The relocation of The Forest High School will enable two major changes for Frenchs Forest:

- New state-of-the art high school, where students will enjoy easy connections to transport, open space and sporting fields
- The opening up of more than 60,000 sqm of ideally located land for a bustling new town centre.

The proposed new site for the Forest High School is 187 Allambie Road, Allambie Heights, around 1km south east of Frenchs Forest Precinct. This site can be accessed from Allambie Road away from major intersections while remaining in the school catchment area. It is also near Allambie Heights Public School and Warringah Aquatic Centre.

Development of the town centre will only occur once the new high school opens. The proposed site is free of heritage constraints and is already serviced by gas, water, sewer, electricity, stormwater and public transport.





28th February 2017

To: Northern Beaches Council
Email address: hospitalplan@northernbeaches.nsw.gov.au

DRAFT HOSPITAL PRECINCT STRUCTURE PLAN

COMMENTS

TRANSPORT

The road infrastructure has not provided for a dedicated bus lane to encourage a mode shift to public transport.

The road works in Warringah Road are confined to 1.3km, so that increased traffic will add to congestion at either or both ends of this limited stretch of road.

The Draft Structure Plan could be deferred until public transport is improved.

The Draft Plan will allow an additional 4,500 people in the Precinct. More frequent bus services will not improve public transport along Warringah Road if buses get caught up in traffic congestion.

A Complete Street diagram (Page 29) shows the proposed bike path between parked cars and a traffic lane. This is unsafe for cyclists, particularly along busy roads. A safer route for a cycle path is between the footpath and parked cars.

The Transport Map (Page ?) shows the bus interchange in Warringah Road near the entry to the hospital. However, this proposed interchange does not capture public transport routes along Forest Way. A more convenient location for a bus interchange is near the intersection of Forest Way and Warringah Road, as this caters for people travelling N-S (along Forest Way) and E-W (along Frenchs Forest Road West).

The existing location of Forest Way Shops is a suitable location for a transport (bus) interchange. The location of the shopping centre is very convenient for people travelling by bus in a N-S or E-W direction.

Frenchs Forest West will have several bus stops and a series of signalised intersections. The transport map shows 7 signalised intersections for bus routes between Wakehurst Parkway and Warringah Road via Frenchs Forest Road West. This could delay bus services along this route.

I am informed the Structure Plan will seek to accommodate another 4,000 people when / if a dedicated bus lane or BRT is provided. However, there is no information about where this additional development would be located.

The spread of development beyond the current precinct would have an impact on surrounding areas that contribute to the character of Frenchs Forest.

The Draft Plan would allow the blanket rezoning of large areas with little space allocated for open space in Precincts 1 and 2.

HOSPITAL - OPEN SPACE

If high rise residential development is to occur, additional parks should be provided, preferably within the same precinct.

Open space next to a hospital is a complementary use that has important benefits for visitors, workers and patients that use the hospital. These benefits contribute to health and mental well being, but have not been acknowledged in the Plan.

Hospitals in close proximity to open space include our existing local hospitals, Manly and Mona Vale, as well as Royal North Shore, which has an oval nearby.

Retaining the high school in its current location is an option. Benefits include nexus between the hospital, education facilities and the retention of open space and trees.

URBAN CORE

The retail core and residential could be confined to land between Forest Way and the existing Forest High school site, which could then be retained for education purposes.

Why do we need concentrated residential and retail development next to the hospital?

Nursing staff from Manly and Mona Vale Hospitals are likely to be recruited initially for the FF Hospital, so nursing accommodation is not an urgent priority. Residential accommodation for hospital staff does not need to be located next door.

Regional and local retail centres already exist throughout the Northern Beaches and nearby Chatswood, providing ample choice for shoppers. A new major retail centre is not necessary and could affect the viability of existing centres.

Similar to RNS Hospital, limited retail facilities could be provided on the ground floor of the FF Hospital. This would be sufficient to service the hospital.

HIGH SCHOOL

If the high school can be redeveloped as 3-5 storey buildings, why not leave it where it is?

If the land is rezoned, the Department could sell off part of it and build a multi-storey high school on the same site. This would avoid the rezoning of aquatic reserve and relocation of WAC.

Retaining the high school grounds next to the hospital avoids the need to cross two major roads, including a 12 lane road, to access the nearest playing field.

CO-LOCATION of SERVICES

The consolidation of local services would be achieved with the co-location of the school, community facilities and shops within walking distance of each other.

A hospital is accessed only occasionally by most people. It is not a frequent destination, except for people who work there. A retail centre, however, is a destination that is used regularly by local residents and would best be located near to other local services, such as a school, community centre and public transport.

The Forest Way Shops area already fulfils this purpose. However, the draft plan converts this area to a residential gateway and the proposal to rezone this area for high rise residential will mean the likely loss of the benefits of this co-location of uses.

TREES & OPEN SPACE

This Draft Structure Plan has emerged in the wake of a devastating loss of trees and forest, once characteristic of the precinct. The Forest High School site is public land with the last vestige of native trees and open space within the precinct.

Accessible open space, playing fields and parks are required for intensive use for public recreation. Bushland reserves are not suitable for this purpose. The loss of open space within the school grounds will reduce land available for active recreation use and put pressure on bushland reserves.

APEX of CATCHMENTS

The Hospital Precinct is located at the apex of several catchments, including Manly Dam, Narrabeen Lagoon (Middle Creek) and Middle Harbour (Carol Creek). The Structure Plan needs to take into account the sensitivity of the surrounding catchments.

Open space, trees and gardens reduce the impact of hard surfaces within the downstream catchments. The replacement of landscape areas with buildings is likely to have an impact on stormwater and creek systems within the catchment.

VISUAL IMPACTS

The proposed height increase will allow tall buildings on ridge top locations where they are likely to be visually conspicuous.

COMMUNITY ENGAGEMENT

At the Forestville RSL workshop that I attended this Draft Structure Plan was not presented as an option. The proposal was restricted to a choice between four options for transport but there was insufficient time to consider the detailed implications of these options.

REZONING to SPECIAL USES

The built footprint of the high school buildings occupy about 3 hectares, whereas the WAC occupies only about one hectare.

The rezoning of aquatic reserve to special uses would allow development to have priority over open space and conservation values of the catchment.

Bushland in aquatic reserve and surrounding areas in Manly Dam Catchment would be at risk of removal for building and APZ purposes.

The bushland near the WAC provides a wildlife corridor and habitat for native fauna, including threatened species, such as the red crowned toadlet.

The land surrounding the WAC has natural drainage lines and soaks that protect the upper catchment of Manly Dam. The hydrology of this area needs to be protected.

The Department of Education cannot be relied upon to protect the environment or public reserves, as demonstrated by Manly Vale Public School development proposal in the south east of the Park.

CATCHMENT

The rezoning of aquatic reserve for Special Uses would conflict with the conservation values of Manly Dam Catchment. The Catchment has conservation values that include protecting Manly Reservoir and its tributary creeks.

In the late 1890's privately owned land was acquired at the northern end of the Catchment to protect Manly Reservoir, which was used as a water supply for Manly. The reservoir is no longer used for drinking purposes, but is used for primary contact recreation, such as swimming, so water quality is still important to protect public health.

BUSHLAND

The hospital and road infrastructure has resulted in the substantial loss of mature trees, endangered DFEC, together with a Category 1 wildlife corridor between Manly Dam Catchment to the south and Narrabeen Lagoon Catchment to the north. The draft Structure Plan will result in the further loss of wildlife corridor, trees and vegetation.

The northern part of the Manly Dam Catchment is identified as the 'lungs' for the hospital precinct. To fulfil this function means protecting bushland and not rezoning public open space for special uses.

DRAFT STRUCTURE PLAN

COMMENTS on 4 PRECINCTS:

PRECINCT 1. FRENCHS FOREST URBAN CORE

"The hospital is anticipated to provide an additional 1300 jobs upon opening." Does this include jobs that are currently provided at the existing public hospitals at Manly and Mona Vale?

Why locate a major retail facility next to the hospital instead of next to the transport node and interchange at the intersection of Forest Way and Warringah Road? The existing Forest Way Shopping Centre is conveniently located at this intersection.

Why is a major retail facility needed in this location and will it compete with shopping centres located at Chatswood, Glenrose, Balgowlah, Warringah Mall, Dee Why and Warriewood? There appears to be a surfeit of shopping centres, but a shortage of education facilities.

"The Forest High School site (63,500sqm) has been identified as the appropriate location for a retail based mixed use development."

The urban core proposal will mean the further removal of trees and open space within this precinct, whereas the retention of the high school grounds will allow trees to be retained.

A vertical high school three to five stories in height would reduce the footprint of the school within this precinct.

In relation to the primary school in Precinct 2 the draft Plan states: “The proposed zoning of the school site will allow for the ongoing provision of an education facility and mixed use development concurrently.” A similar plan could be envisaged for the high school.

PRECINCT 2. RESIDENTIAL GATEWAY

This precinct is convenient as a transport hub for bus services. Will this be retained?

The Forest Way shopping centre is in a convenient location, particularly for people using public transport and residents living west of Forest Way. Is a retail function to be retained in Precinct 2?

The plan states that “*The primary school site is proposed to be retained in its current location.*” However, the substantial increase in land value would make this less likely.

The rezoning of the primary school site to allow high rise residential development is likely to result in the sale of public land and require an alternative site for a primary school.

The existing school is conveniently located near to a shopping centre and transport hub.

If the school is relocated, the existing playing field could be retained as a park.

The increased height to 40m is likely to have a visual impact on public reserves to the west.

The proposal would allow medium density development 11m high along the eastern edge of the reserve. The existing low density housing have rear gardens that back on to the reserve and provide a more suitable transition between urban development and the bushland reserve. The rear setback should be retained to protect the bushland slopes below.

PRECINCT 3. BUSINESS PARK AND INNOVATION PRECINCT

“The precinct does not currently have any open space commensurate with the role of a business focused precinct.”

“Apart from the hotel and pub, no cultural and social assets currently exist within the Business Park and Innovation Precinct.”

Education, cultural facilities and open space would complement the function of the Business Park.

If Forest High is to be relocated from Precinct 1, Precinct 3 is an option. In the draft plan, the additional uses to be included for this Precinct include education.

“The existing business park has not seen take-up of development in current market conditions despite flexible planning controls.”

The native vegetation within this Precinct has values for conservation, as a wildlife corridor and contributes to the character of the Forest precinct.

PRECINCT 4. RECREATION AND SPECIAL USE PRECINCT (Page 82)

The Draft Plan does not identify that Precinct 4 is within Manly Dam Catchment or that aquatic reserve is part of Manly Warringah War Memorial Park.

“Aquatic Reserve provides a significant opportunity for a benchmark project including the integration of social infrastructure and educational facilities. The reserve has the potential to accommodate the relocated Forest High School in addition to multi-purpose and shared recreational space for community use.”

Aquatic reserve is within the boundary of Manly Warringah War Memorial Park and Manly Dam Catchment. The area has environmental values and constraints to development. Where will ‘a benchmark project’ (referred to above) be located in aquatic reserve so that it does not impact on bushland?

Will additional amenities and facilities be commensurate with the environmental constraints?
The long term ecological sustainability of the catchment is a relevant consideration.

The Draft Plan suggests that additional facilities will be provided in Precinct 4, but does not provide any detail about what facilities would be provided or where these would be located. The Park has established values for recreation and environmental protection and is not suitable for any substantial increase in development.

The cross hatched area (zoned E2 for environmental protection) should be extended to include the bushland to the west and south of the WAC building.

A North-South access route is identified to the east of the playing fields. The bushland corridor to the east of the playing fields has a high conservation value and would not be suitable for a pedestrian corridor. A more commonly used access route is between or west of the playing fields. This provides a more direct access from the bus stop and to steps traversing the slope south of the playing fields.

Ann Sharp

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Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
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Submitted by: Anonymous

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Curl Curl 2096

Submission

FRENCHS FOREST 2041 DRAFT PLACE STRATEGY

Figure 2

"Embellished open space includes Aquatic Reserve (State Park) in Manly Dam Catchment. This area contains remnants of the endangered Duffys Forest Ecological Community."

The area shown as 'embellished open space' extends across Aquatic Reserve and encompasses bushland that has been identified as the endangered Duffys Forest Ecological Community (DFEC). The area to the west and south of the Warringah Aquatic Centre should be retained for environmental conservation and the E2 zone extended.

Bushland areas are also important for catchment protection. The Park is zoned RE1 but bushland areas warrant rezoning for E2 environmental conservation.

Figure 3

The E2 zone west of the Aquatic Centre should be extended to include a wider area of bushland, to the west and south, that has been identified as the endangered DFEC. This should occur in conjunction with zoning bushland in the Park as E2 environmental conservation.

THE TOWN CENTRE

Page 24

- "a strong health and education focus, including the potential for a future university.
- a new community hub."

The Town Centre does not have a strong focus on education.

The focus on education is lacking, as the high school is to be relocated.

A high priority should be given to retaining this public land for education use.

A future university could also be incorporated on this site.

A new community hub should be co-located with education facilities.

"Public areas will embody the area's character, and will include:

- the 6,000 sqm Village Green;
- the Forest Parkland, a 5,500 sqm urban bushland and adventure play area, with walking and cycling paths and picnic areas"

The Village Green and Forest Parkland have merit, but open space is required for active sports, preferably within the Town Centre precinct.

The existing playing field in Frenchs Forest High School grounds should be retained for active use.

There is a shortage of sports fields and the playing field is used at weekends for sporting activities.

THE CIVIC HEART

Page 25

"The Civic Heart will be designed with lower building heights adjacent to these public areas, transitioning to taller buildings to the east and south. These buildings will be designed for maximum flexibility and adaptability for a range of community, education and retail uses."

Flexibility and adaptability is useful for a range of functions, but it is important to allocate dedicated space to community and education use.

Community and education facilities should be retained in public ownership to encourage public use and avoid rental costs that would be managed by a private owner.

Retail and commercial use can be flexible, as the demand is variable and dispersed.

THE MARKET QUARTER

Page 29

"It will have a high-rise urban feel, with buildings up to 12 storeys featuring apartments, with shops and services at ground level."

High rise buildings up to 12 storeys will be located on a ridge where they will be highly visible from vantage points in the surrounding catchment areas. The tall buildings will impact on scenic views from surrounding reserves, including Garigal National Park and Manly Dam Reserve.

The Market Quarter precinct could be used for social infrastructure purposes as a hub.

"Provide an area of 7,745 sqm for the community hub"

Co-locate community hub with education facilities.

The plan does not include the provision of an area for public education.

Note: The photo on this page is highly misleading as the existing oval will be built on.

"For land in the R3 Medium Density Residential zone on Frenchs Forest Road West..."

The R3 zone opposite the hospital site extends across a ridge area adjoining steeply sloping terrain. The runoff from this area drains to Middle Creek and the increase in impervious surfaces affect water quality and flow entering the Creek. Low density with garden areas should be retained near and on the sloping land to protect the Creek, which flows to Narrabeen Lagoon.

"For land at the corner of Wakehurst Parkway and Frenchs Forest Road West additional permitted uses will include hotel and motel accommodation and serviced apartments."

The land is also near steep terrain and its proximity to the Parkway does not appear suitable for this purpose.

RELOCATION OF HIGH SCHOOL

Page 17

"The proposed site is free of heritage constraints and is already serviced by gas, water, sewer, electricity, stormwater and public transport."

"The opening up of more than 60,000 sqm of ideally located land for a bustling new town centre."

Why do we need a bustling new town centre instead of a much needed high school which is purpose built on land reserved for education in 1961 – 50 years ago – to cater for the future population?

There is no mention of the environmental and land use constraints of the proposed site.

The area proposed for the new high school is much smaller than the existing high school site.

The site has limitations for a large high school and there is little scope for expansion.

Increased population in Frenchs Forest Precinct will require additional places for education.

The high school will be in close proximity to Manly Warringah War Memorial State Park.

Adverse impacts on the Park's natural areas will result from an increased intensity of use.

Additional resources will be required to manage the conservation values of the Park.

The land is located in Manly Dam Catchment which is not suitable for intensive development.

This includes expansion to provide additional facilities to cater for an increase in population.

High rise buildings on this site is likely to affect views from within Manly Dam Reserve.

"Development is to be designed to ensure that long distance views of the land are not dominated by the built form."

Planning controls that apply to the proposed site include:

East to West Wildlife corridor (DCP - E4)

Native vegetation (DCP - E5)

Landscaped Open Space 50% of the site (DCP - D1)

BIOBANKING SITE adjoins western boundary.

Zones and Sensitive Areas – (DCP - F3)

"Future development will ensure that the relationship of the site with district bushland is reinforced by protecting and enhancing the spread of indigenous tree canopy and preserving the natural landscape, including rock outcrops and remnant bushland. New landscaping works are to comprise

predominantly locally indigenous species.”

“Development is not to compromise the viability of threatened or potentially threatened species populations or habitats. Potential “edge effects” of development on these species, communities, populations and/or habitats are to be minimised and managed.”

“Development is to include measures to minimise the potential adverse impacts upon the water quality of the Manly Dam. Existing creeks and natural watercourses are to remain undeveloped and are to include a riparian buffer zone comprising appropriate vegetation.”

DRAFT EXPLANATION of INTENDED EFFECT (EIE)

Figure 1 Proposed Warringah LEP 2011 Land Zoning Map
Page 19

The existing areas shown Public Recreation in the Hospital Site should be retained for public recreation / environmental protection. The eastern portion contains mature trees that are a remnant of a public reserve and native forest on the site. These trees and vegetation provide visual amenity.

Figure 7: Proposed land acquisition– Frenchs Forest Precinct
Page 23
Re area at south east corner of Warringah Road / Wakehurst Parkway Intersection.

This area contains bushland and is located within Manly Dam Catchment.
The purpose of the acquisition is presumably for road infrastructure, but its removal will mean a further loss of vegetation in this area.

THE GREEN PLAN

Committed Initiatives (0-10 years)

“The NSW Department of Planning, Industry and Environment, is in discussions with Northern Beaches Council to deliver a new park at Nandi Reserve that can be enjoyed by the community as a place to relax, connect with nature and breathe in the beauty of well-designed public open spaces (final outcomes subject to ongoing stakeholder and community engagement)”

The Plan of Management states: “Nandi Reserve is located in Frenchs Forest and sits at the southern edge of the Narrabeen Lagoon Catchment. Its part of an important corridor linking large parcels of bushland in the Oxford Falls Valley with Manly Dam.”

The reserve is relatively narrow should be protected for its important biodiversity, wildlife habitat and water catchment values. It is suitable for a walking trail but not for intensive or use, such as bike riding, or intrusive infrastructure, such as car parks. The \$9m would be better allocated to acquiring additional areas of open space.

“Establish a continuous pedestrian and bicycle connection linking the Precinct to the many trails surrounding Manly Dam via Aquatic Reserve and other trail links. This will include new paths and trails, sensitively upgrading some bush tracks to improve access, new stairs and supporting elements (park furniture).”

Page 60
“The Green Plan also proposes to establish a regional connection linking the Precinct to Manly Dam. This will be achieved through a continuous network of pedestrian and bicycle links leveraging the existing open space areas across the Precinct.”

Manly Dam Reserve has sensitive bushland and waterways that need to be protected. Intensive use associated with the influx of thousands of residents living nearby is a potential threat to the sustainable management of the bushland area.

Page 61
“Undertake a land acquisition strategy for open space and monitor properties in the open market;”

I fully support this next step as it is very timely to protect valuable areas for conservation and recreation, particularly within Narrabeen Lagoon Catchment.

RE TOWN PLAN

Provide open space and education facilities next to the hospital. These land uses deserve a higher priority and have some advantages compared with 12 storey residential buildings and shops.

Compare the proposal with Royal North Shore Hospital, which has an oval and heritage listed cemetery nearby, both of which provide open space areas. In my experience, when visiting relatives and friends, or as a maternity patient, this open space was therapeutic and much appreciated.

The proposal will result in the further loss of trees and open space, which are now much needed in this precinct. As a consequence of the extensive road works associated with the hospital this area is now bereft of forest and trees. The grounds of the high school provide a remnant patch of green in a vast area of concrete and buildings. For passing motorists the grounds provide some visual relief from the barren landscape in this vicinity.

The urban core development could be restricted to the residential area between the school and Forest Way. There is no need to replace the school with high rise residential dwellings.

If the school site is sold, the proposal will result in a loss of over 6 ha of public land. Land allocated to education is a shrinking asset without any replacement land acquisition.

SHORTAGE of EDUCATION LAND

During recent decades the Northern Beaches has been subject to the progressive loss of land set aside for education purposes. This includes the former TAFE sites at Seaforth and Mona Vale, the sale of school land to fund building projects, as well as sites identified for future school purposes. A glaring example is the demolition and sale of Beacon Hill High School land in 2006.

The Regional Plan for Northern Sydney recognises the precinct as a HEALTH and EDUCATION PRECINCT, not just a health precinct. An education facility is complementary to health. The adjoining land uses of health and education are not only compatible, but can fulfil a symbiotic function, such as education that contributes to community and preventative health.

Northern Beaches has a deficit of playing fields to cope with the demand for sporting uses. The existing playing fields on the Forest High School provide for sporting use and contribute to the health of the community. These fields should be retained in the Health and Education Precinct.

A recent article in the North Shore Times promotes the new concept of locating schools in urban centres.

Each of these factors supports the retention of the existing high school land for EDUCATION PURPOSES.

The proposed sale of the Forest High School site would mean a substantial loss of education land.

Land that has been allocated for education warrants a higher priority than residential and retail.

FRENCHS FOREST 2041 DRAFT PLACE STRATEGY

Narrabeen Lagoon Catchment

The Draft Place Strategy includes a proposal to rezone land on the northern side of Frenchs Forest West from R2 (low density housing) to R3 (medium density housing).

Currently this area consists of low density residential with many native trees and large gardens.

The trees currently provide a vegetation corridor to the west of Wakehurst Parkway.

The land has a mildly sloping gradient and adjoins steeply sloping land (and a small public reserve) in Middle Creek Catchment.

ENVIRONMENTAL CONCERNS

Trees and Open Space

The Forest High School site (63,500sqm) is proposed for a retail based mixed use development.

The draft plan makes provision for landscaped open space, but will result in the further loss of trees and open space. The extensive removal of trees and forest, including Duffys Forest Ecological Community, has occurred already in conjunction with the hospital construction and road widening.

The loss of the oval in the high school grounds will put increasing pressure on remaining areas of open space for active recreation. The oval is in close proximity to surrounding residential areas and is suitable for shared use.

Hydrology

Loss of open space would mean a reduced area for rainfall infiltration and recharge area at the top of the catchment. The draft plan will significantly increase the extent of impervious surfaces. This will change the hydrology and impact on water quality and flow in downstream areas.

Vegetation and Habitat

North of the hospital, the low density residential area has gardens and many trees that contribute to wildlife habitat and a N-S vegetation corridor. The zoning of this area from low to medium density will result in the loss of many trees, as well as landscape open space.

Scenic Amenity

The proposed high rise buildings will be located on ridge tops. Tall buildings are visually prominent when viewed from vantage points in surrounding areas. This will affect scenic amenity in parts of the catchment.

Higher density zoning of land near slopes

Land north of the hospital site has a gradual slope and adjoins steep land. The rezoning of this land for higher density will impact on downslope areas within Middle Creek Catchment.

Development Creep

Rezoning for such high intensity development is likely to result in 'development creep' due to the high increase in land value. Rezoning for higher density increases development pressure on adjoining areas within the Catchment.

Protection of the environment

An important priority is to protect the natural assets within Narrabeen Lagoon Catchment, including native vegetation, biodiversity, wildlife habitat and waterways.

ATTACHED SUBMISSION

The attached submission contains comments and suggestions that are relevant to the Frenchs Forest 2041 Draft Place Plan.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Friday, 3 September 2021 11:59:29 PM

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Submitted by: Anonymous

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Quirk

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[REDACTED]

Suburb/Town & Postcode

Frenchs Forest

Submission

Relocating the the high school results in losing - sporting 20,000m2 to 8,000m2.

Sporting grounds are already in short supply in the Northern Beaches.

Please allow for additaional sporting ovals as part of the development.

Bushland in surrounding areas is of high value.

Please buy land to preserve bush eg red Hill / cromer

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
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Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Saturday, 4 September 2021 12:17:38 AM

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Submitted by: Anonymous

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Suburb/Town & Postcode

2101

Submission

Comments on the Frenchs Forest Precinct by [REDACTED]

This plan fails to mention the impact of this new precinct on the Narrabeen in catchment, a highly valued catchment filled with bushland. There is no mention about air pollution, water pollution, light pollution, impact on threatened species and achievement of net zero emissions.

These issues all need to be considered in conjunction with this proposed precinct development.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
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2101

Submission

Comments on Frenchs Forest 2041 Place Strategy

The draft strategy fails to consider the impact of the Frenchs Forest Precinct in the greater environment.

This new precinct sits in the headwaters of the Narrabeen Lagoon Catchment. There is no mention about the impact that it will have on the creeks that run through the bushland to the north and east of this precinct nor the impact on the Narrabeen Lagoon catchment not ultimately the Ocean.

This new precinct will have a large amount of paved area and road surfaces. Given that climate change is leading to flash floods around the world with an ever-increasing frequency, discussion needs to be had about the impact of vast amounts of water flowing from this new precinct into the riparian zones to the east and to the south. There needs to be adequate retention of water and treatment of water within the precinct.

There is no mention within this precinct plan about how water will be treated both for gross pollutants and for chemical pollutants as well as siltation. There is no mention about how this untreated water will impact upon the Narrabeen Lagoon Catchment. This water has the potential to cause drastic flooding downstream in Middle Creek especially where the Wakehurst Parkway crosses Middle Creek. There are also threatened species such as red crowned toadlet that will be lost due to high sedimentation. There is a population of red crowned toadlets in Trefoil Creek just below Frenchs Forest Road East. There are also populations of red crowned toadlets where the Middle Creek crosses the Wakehurst Parkway.

The R3 zone acts as a buffer between the hospital and the bushland to the north and east. All old-growth trees in this area should be retained and buffer of bushland between it and the Wakehurst Parkway should be maintained and widened. This buffer will provide visual amenity to the users of the Wakehurst Parkway and also act as a corridor that allows the passage of wildlife that used to pass through the area especially birds and bats as all other land dwelling animals are now excluded from the wildlife corridor across Warringah Road.

There are already significant plastic pollutants in Trefoil Creek, remnants from when the hospital was built, and in the creek that runs through Jindabyne Reserve.

Gross pollutant traps need to be installed in all headwaters of the creeks that lead to Middle Creek.

These gross pollutant traps need to be cleaned out regularly probably monthly.

When the RMS was working on the intersection of the Wakehurst Parkway with Warringah Road they put in a water treatment system at the corner of Aquatic drive. A similar water treated treatment system needs to be placed permanently below this precinct so that it removes chemical pollutants from the precinct which include pesticides, fertilisers et cetera as well as removing siltation so that it does not enter the riparian zones surrounding this precinct

All buildings in the new precinct that are higher than two stories should have glass that is opaque to birds.

In the USA millions of birds are killed every year through building strike. Developing a high-rise precinct in the middle of what was once bushland will lead to many birds perishing as they hit the windows of the buildings.

Powerful owls, another threatened species that have twice been moved on by the Northern Beaches hospital, are particularly susceptible to building strike.

The City of Sydney has already implemented a policy on bird strike and windows. This needs to be emulated and enforced in this new precinct

There is no mention in this document about the impact of increased traffic on the surrounding suburbs such as Beacon Hill, Allambie Heights, Narrabeen, Dee Why, Seaforth and Killarney Heights just to name a few.

It is expected that there will be two cars per dwelling which will lead to a massive increase in vehicles utilising the roads in the Northern Beaches. This will have a significant impact on the existing residents of the Northern Beaches

It would be far better to design a precinct where parking is limited, car usage is limited and there is more than adequate public transport. These nudges will discourage people from car ownership.

These nudges have been shown to be effective in places such as Singapore and Hong Kong.

It is imperative that the B-2 bus line from Dee Why to Chatswood running extremely frequently without requiring a timetable should be set up

immediately.

Reduction in car usage would also lead to a reduction in air pollution.

It has been demonstrated in the UK that reducing air pollution also reduces the risk of people having strokes and heart attacks as well as asthma and other breathing diseases such as chronic obstructive airway disease.

There is no mention about the light pollution from multi-storey buildings impacting on to the bushland surrounding this new precinct. It is a well-known scientific fact that light pollution impacts upon native animals and has the potential to affect their ability to breed. The frequency of the light waves emitted is crucial. These impact needs to be considered and mandated in the plans for the area.

Lighting also is a considerable consumer of energy. There should be a plan in place to ensure that lighting is powered by sustainable energy resources and uses as little power as possible

There is no mention within the document about how water will be heated. It should be mandated for developers that heat exchangers are to be used for heating water. It is unacceptable to use natural gas if society is to reach net zero as soon as possible.

Gas should not be supplied to the precinct.

There is no mention of solar panels on the roofs, or the ability to add solar systems on vertical planes such as windows as the technology advances.

There is also no mention of community batteries.

The minimum of four hours solar access to 70% of the village green on June 21 that is the middle of winter is unacceptably low. A greater reliance on passive design is essential if this precinct is going to achieve net zero

The proposed development sits along a ridge line running north-south. It will be highly visible from all areas of the Northern Beaches

The Northern Beaches Hospital is visible from many areas in the Northern Beaches including Kuring gai National Park. This means the new precinct with its multiple high-rise buildings will impact upon the visual amenity of bushland in the Northern Beaches.

It is commendable that 30% tree cover is envisaged for the precinct. However this area already has many existing old-growth trees. The removal of these old-growth trees as happened in front of the hospital means that we will wait many generations for the new trees to replace them. This is totally unacceptable. Buildings should be designed around existing old-growth trees rather than immature new trees designed around buildings!

The Department of planning, infrastructure and environment needs to urgently plant multiple avenues of trees between Warringah Road and the new Northern Beaches Hospital. Old-growth trees were drawn into the original artists impression of the northern beach is hospital but they have all been cut down.

The area in front of the Northern Beaches Hospital between the buildings and Warringah Road has large areas of grass that is totally inappropriate for people to utilise.

There is no shade and the grass is unpleasant to walk on and requires frequent mowing, watering and fertilising. This area could be utilised as a really nice place for people to gather it was replanted and redesigned

The proposed plan to move the Frenchs Forest High School over to Allambie Heights Road will cause significant problems with the Manly War Memorial Park.

It is proposed that the blocks DP 1271174, and DP 1194177 be acquired for the school.

DP 1271174 is still covered in bushland. It adds to the bush feel of the area. It is also adjacent to the original offset site from the hospital which is meant to be maintained in perpetuity as bushland.

It is not acceptable to use this bushland block. It provides connectivity for wildlife to the offset site and adds to the visual amenity of bushland along Aquatic drive.

Local residents value bushland and it is continuously being chipped away by development in the Northern Beaches

There is very little space on DP 1194177 to build a high school. However, a school could be built on a smaller footprint preferably two stories as has been done with the Hardboard Primary school or some of the inner-city schools such as SCEGGS Darlinghurst

The school would also have built to ensure that the run-off from the school did not impact on the riparian zones in the Manly War Memorial Park and therefore Manly Dam and other riparian zones further down the catchment.

I agree to the above statement

Yes

We are the co-owners and residents of the property at [REDACTED]. Our property is located right opposite the Emergency Entry to the Northern Beaches Hospital. It is accessible from Frenchs Forest Road West.

The current FSR under the Warringah LEP 2011 applicable to our property is not subject to any FSR controls and its maximum heights of 8.5m is applied. Under the Draft Frenchs Forest 2041 Place Strategy, our property falls within the character area of Site B. The maximum floor space ratio of 1:1 is proposed to our property with the height limit of 13metres, whereas the Hospital Precinct Structure Plan sets out 2.2:1 in FSR and 34 metres in heights. The proposed FSR and the maximum height are significantly reduced under the Draft FF 2041 Place Strategy.

We ask to increase our FSR to 2:1 and height to 20 metres as marked in the attached Map 1. The properties in the front row fronting Frenchs Forest Road West are offered with 2:1 in FSR and 20metres in height. As indicated in the Map 1, our property has a narrow frontage to Frenchs Forest Road West. Nonetheless, our property is part of the front row of the Frenchs Forest Road.

According to the Hospital Precinct Structure Plan, it states “ *Following extensive community engagement in November 2016 to February 2017 (Stage 3), resulting in 930 submissions, a revised Structure Plan was prepared. This report represents Council’s revised Structure Plan and takes into consideration the intent and vision of Frenchs Forest as it transitions into a Strategic Centre. **More specifically, the revised Plan results increased density** within and surrounding the town centre adjacent....”*

It is quite surprising to reverse this findings and vision by reducing FSR and the height significantly when specifically, the plan was revised with increased density after taking into account of the community responses.

Specifically FSR of 2.2: 1 and 34 metres in height for our property were based on the council analysis to “*ensure feasibility in the immediate to short term based on current land values.*” (extracted from p14 of implementation of the Hospital Precinct Structure Plan).

The significant reduction in our FSR and height may not warrant viable development option in reality.

“ *In context, Australian property values have jumped 15.8 per cent since 2021 began. They were also 18.4 per cent higher compared with this time last year making it the fastest annual rate of growth in 32 years (since July 1989 to be exact).*” (extract from ABC news dated 31 August 2021).

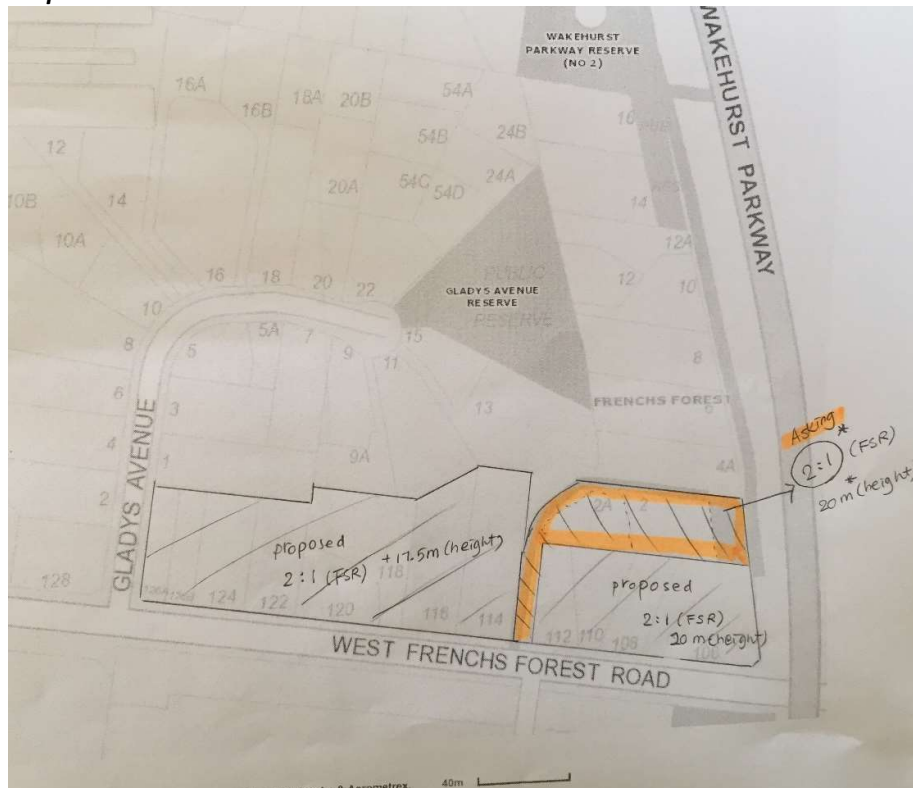
What we can induce from the above is that the property market is very strong and competitive. The market condition has so much changed since any financial analysis was undertaken for the proposed draft Strategy, presumably the same outsourced professionals CHROFI and Architeus undertook the analysis of both occasions on the proposed town centre for Hospital Precinct Structure Plan 2017 and Draft Frenchs Forest 2041 Place Strategy . Sydney property value has increased 19.3% over the last year (“Core Logic Stats”). To break this down further,

Northern Beaches has increased even higher than 20% this year (increasing *the value by \$11,000 a week this year* – Realestate.com.au). Like some of the owners, we, two separate households reside on one property as the co-owners and are very happy with two independent housing arrangements. It means if this property is sold to a developer in future, two households have to secure our own houses respectively. And If the market trend continues as predicted, we may not want to sell our property to a developer with this proposed FSR as it won't be viable to buy a property to relocate ourselves in the northern beaches area. We have already had response from some developers who approached us late last year and were told they won't be able to commit to the project based on the current draft FSR and withdrew their position.

We are very happy to stay in our property, see the new town centre and enjoy the new amenities offered by new development in Frenchs Forest if the currently proposed FSR does not warrant our needs and it is not viable for our relocation. By the same token, we would much like to see and support the whole new development as envisaged by the government vision only if it is feasible for us to move out.

We are not asking to maintain 2.2:1 but at least the same condition namely FSR of 2:1 with 20 metres in heights in line with other properties in the front row as we are part of the front row fronting Frenchs Forest Road. This would result in a better and viable development opportunity on the whole site as we set out our reasons below further.

Map 1



Our property is positioned uniquely in that it provides a vehicular access from Frenchs Forest Road West to various properties including Nos 4 - 16 Wakehurst Parkway to the north as those properties do not have direct access from Wakehurst Parkway at present.

We are aware that the properties' owners (Nos. 6-16) raised an issue of access and increased traffic volume [REDACTED] once future development occurs. It is very ironical that they want to use our land as their vehicular access exclusively and yet they want to deny our right to develop. It is clear there is a conflicting interest here between our property right to develop and their wish to use our land exclusively for their private access. *(They don't appear appreciation of freebie!)*

We would like to suggest an alternative access to eliminate this unsettling issue based on our local knowledge and observation of the surroundings. Also this idea was raised by Winten Property Group who used to be interested in the site as a viable option to benefit everyone in stake.

As you can see in the Map 2, there is a public reserve, Gladys Avenue Reserve. This Reserve has an access from Gladys Avenue directly and this reserve expands fronting Nos 6 -16 Wakehurst Parkway. As shown in the photos 1-3, much of this reserve is already cleared and appears some of the owners/residents of Nos 6-16 have been using this area to park their cars. This provides excellent vehicular access to those properties in a safer way (to the residents of Nos 6-16) and a fairer way [REDACTED] In particular, Gladys Avenue is accessible through the traffic light so that the cars entering Gladys Avenue is more controlled.

Map 2



By providing this alternative vehicular access to the properties Nos. 6-16, this not only eliminates their concerns about the increased traffic volume through our property but also it creates an excellent development site (as marked in Map 2) as a proper decent sized development site if amalgamated. This will be more attractive to the major development companies. And we may see more desirable development outcome.

Photo 1. Gladys Avenue Reserve



Photo 2. Cars parked at Gladys Avenue Reserve opposite No 8 Wakehurst Parkway.



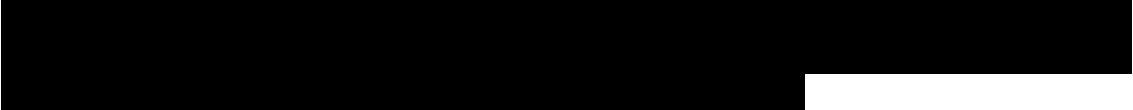


Photo 3. Access from Gladys Avenue

We believe we have a socially shared responsibility to accommodate the future growth and needs such as housing and jobs. We love Sydney and living in the northern beaches area in particular. What makes us sad is to see Sydney is giving up its potential beauties sometimes by allowing too many small hotchpotch developments to occur everywhere in this beautiful harbour city. The hotchpotch new development may look new and fresh in the beginning but those ugly segmented buildings built by second grade builders will present a great regret to our beautiful city later in 20-30 years time down the track which we see now everywhere in Sydney, unlike our heritage buildings built over 100 years presenting beautiful legacy to many generations. We would like to see a really good quality building with excellent design features in this beautiful area. If the site is not sizable enough, and financially viable and feasible, it may not attract the great development opportunity to support the proposed town centre and its precinct.

Our request for 2:1 in FSR and 20m in height may raise concern about possible adverse impact from the scale and bulk on the immediately neighbouring properties (in particular Nos. 6-16) that are not part of this proposed rezoning area. The main concern would be overshadowing and bulkiness from the building mass. First of all, the building mass can be controlled by many design aspects set out in Development Control Plan. The more pressing concern would be overshadowing by the new development. However, the properties at the back to the north including Nos 6-16 would not be affected with overshadowing by the new building on our property even if it is 6 six storeys (about 18-20m) as you may already have undertaken overshadowing analysis. The morning sun will cast the shadow over the development site, not over the properties at the back to the north. Likewise, the early and afternoon sun from the north and the west will cast the shadow towards Wakehurst Parkway and Frenchs Forest Road West if the new 6 storeys are built on our land. Thus the properties Nos. 6-16 would not be overshadowed at all resulting from the higher building on the proposed rezoned area.

We also note that the draft Strategy identified Area 24 promoting some hotel and motel accommodation and serviced apartments to support future demands from the hospital patients and visitors given that Area 24 is right opposite the hospital Emergency department.



As explained so far, we would like to see a great progress and fantastic development happen to support the town centre precinct. As explained, the increased FSR and height on our site does not result in adverse impacts on the immediately neighbouring properties that are not part of this rezoning. This also conforms to the earlier traffic study, feasibility analysis and community response that were established in the Hospital Precinct Structure Plan. Besides, the alternative access to the properties Nos 6-16 would eliminate their individual concern on the safe vehicular access and provide a great development potential. Council would be able to raise more contribution through successful development to improve road condition and its immediate amenities for the residents.

Thank you for taking time to read and consider our submission. We are available to discuss further if needed.

Yours faithfully,

Luke Schotel & Hyo Jung Lee
Minyoung Lee & Leewon Kwon

[REDACTED]

[REDACTED]

Sent: Sunday, August 29, 2021 10:43 pm

[REDACTED]

re-zoning to phase 1 Frenchs Forest Place Strategy

Dear [REDACTED]

My neighbours & I request that the lower part that is the northern end of Holland Crescent & Frenchs Forest West to Rabbett Street be in phase 1 of the redevelopment. There need not be any disruption to traffic on Frenchs Forest Road as all loading & unloading should be carried in Holland Crescent. The main bus stop is in easy walking distance with a very good fast bus service with very few bus stops to destinations 18 minutes to Chatswood & 25 mins to Wynyard so a B-line bus service would be of little advantage to our portion of Frenchs Forest unlike the beachside suburbs with much greater distances to travel.

This is without doubt a perfect area for units & if in phase 1 council would benefit enormously with millions of dollars through extra rates & the new town centre will have a large number of eager patrons keen to patronise the businesses when they open & would be most likely to be repeat customers of most of the businesses.

The floor space ratio must be high enough to make it worth while for developers to invest.

The Forest area has been neglected for decades. The hospital is easily the best thing to happen to us but when you think about it the roads are essentially for the beachside suburbs

We have been waiting in anticipation for about 7 years with updates promised just about every 3 to 6 months & in the latest plan we will have to wait another 10 years, very nice for speculators, but not for us who have paid rates for decades

About the end of 1984 or early 1985, on talk back radio, I heard the interviewer ask the then Labour premier, why when the sewer has been connected to all the northern beaches suburbs a small pocket of houses in Frenchs Forest is not connected, when will they be? His answer was, while ever he was premier they will never get the sewer as it is the strongest Liberal area in the state. Fortunately Nick Greiner became premier very soon after and we got the sewer immediately, after being in the wilderness for several years.

I fear that if the Labour party wins power they will cancel everything they can & allocate the money to there own or borderline electorates.

Ps . I think that we have been living in Frenchs Forest longer than anyone living here today July 1954, backing onto Sorley Village in Adam Street West and grew with the Forest.

Thank you

Yours Faithfully

John Pickering

[REDACTED]



From: Marc Cottee 

Sent: Tuesday, 7 September 2021 11:17 AM



Subject: local resident feedback on proposed DPIE draft strategy for Frenchs Forest

Please relay my comments to whoever is doing the community consultation for the **proposed DPIE draft strategy for Frenchs Forest**:

Dear community consultation committee:

I do NOT support the DPIE draft strategy for Frenchs Forest, for several significant reasons.

The scale of the proposed development is out of character with what locals love about this area. We don't want another Chatswood style medium & high-rise 'town centre' - yet this is clearly what is being planned. The proposed rezoning would open the flood-gates to high-density multi-storey buildings - not just in the town centre but also in the surrounding streets, as far as the rezoning extended.

This will ADVERSELY change the local environment from a peaceful, sunny, low density suburban vibe to a noisy, high-traffic, over-shadowed & wind-tunneled, high-density surrounding area. Parking & competition for social resources would be adversely impacted.

Property prices will continue to be pushed beyond affordable for many more locals who wish to own a traditional Aussie house with a back yard – instead they will be forced to settle for a cramped box in the sky – or encumber themselves & likely their children with insane levels of debt.

Covid has taught us that high-density living leads to far higher transmission of viruses.

What this proposed plan MOSTLY does is look after greedy developers and drive our once peaceful & leafy suburb to be a noisy concrete jungle with unaffordable property prices. This does not look after the local residents. Not happy with this proposal at all!

Kind regards,

Marc Cottee



I recognise and appreciate that I live and work on Aboriginal land and pay respect to Elders past, present and future.





From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Thursday, 9 September 2021 11:10:59 AM

Submitted on Fri, 23/07/2021 - 15:37

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

2086

Submission

Your big moves are wrong.

First big move should be to secure rapid public transport to dee why and chatswood - how else will people in higher density living situations get anywhere with lower parking allocations?

Second big move should be to secure rapid transport down the yet to be build beaches link, to the city, for the reasons above.

the entire area is low rise, low density. development is inevitable, however should be kept within the character of the area and medium density and medium rise vs what is proposed should be the maximum.

final point - this area doesnt have any footpaths! we just moved here and its ridiculous! people walk on the roads to get anywhere and its dangerous. any development package should include provision for footpaths and crossings for the entire 2086 postcode.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Thursday, 9 September 2021 11:11:19 AM

Submitted on Fri, 23/07/2021 - 16:23

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Stephen

Last name

Beatty

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Clontarf

Submission

Please ensure there is green space in the plan , and ovals for recreational and organized sport. The area right now has a good oval , and with more people we need this infrastructure in place

I agree to the above statement

Yes

Submitted on Fri, 23/07/2021 - 17:15

Submitted values are:

I am making a personal submission

□ □ □ □ □

Yes

FORESTVILLE

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Thursday, 9 September 2021 11:12:00 AM

Submitted on Fri, 23/07/2021 - 18:56

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

██████

Last name

██████

I would like my submission to remain confidential

Yes

Info

Email

████████████████████

Suburb/Town & Postcode

2086

Submission

Do not move high school to new sight which means it is less accessible to transport and open space . Also near transmission wires which has health problems. Also we do not need a new town centre as it will compete with Forestway shops.

Do not let developers demolish our homes to make high rise units that no one wants these days. It would be environmentally wrong to destroy our area for a town centre that is not needed.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Thursday, 9 September 2021 11:12:21 AM

Submitted on Sat, 24/07/2021 - 07:37

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Nick

Last name

De Bont

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

2087

Submission

I would like to see a large playground including in the Green space to cater for the increase in families within the area. This would also attract families from the wider area to utilise the shops and cafes.

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Thursday, 9 September 2021 11:12:36 AM

Submitted on Sat, 24/07/2021 - 08:07

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Craig

Last name

Attwater

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

2086

Submission

With the reduction in FSR, possible special infrastructure contribution scheme, proposed underground power, increase in setbacks on Frenchs Forest Road has made the phase 1 land unsaleable.

The 2041 completion date seems unlikely as residents have no incentive to sell and developers will see no financial gain to purchase with the above restrictions and land size.

The proposed draft plan in its current format will not support growth in the area or investment.

I strongly recommend that the above is reviewed and changes made so that the northside of Frenchs Forest road west will attract investment and contribute to the vision of the area.

I look forward to your response.

Kind regards
Craig Attwater

I agree to the above statement

Yes

From: noreply@feedback.planningportal.nsw.gov.au on behalf of [Planning Portal - Department of Planning and Environment](#)
To: [DPE CSE Frenchs Forest Precinct Mailbox](#)
Cc: [DPE PS ePlanning Exhibitions Mailbox](#)
Subject: Webform submission from: Draft Frenchs Forest Place Strategy
Date: Thursday, 9 September 2021 11:12:52 AM

Submitted on Sat, 24/07/2021 - 10:27

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Andrew

Last name

Eyre

I would like my submission to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Beacon Hill 2100

Submission

Dear Sir/ Madam, I am strongly opposed to the development of the Frenchs Forest area outlined in the draft policy of Frenchs Forest 2041. As in the development draft strategy of Ingleside, there is minimal capacity for long term infrastructure construction to allow the increase residential capacity in this area. Despite a \$500 million construction of the Warringah Road/ Forest Way/ Wakehurst Parkway intersection , it still takes regularly takes residents 35 minutes to travel the 7km from Brookvale to Forestville. Traffic queues are back to preexisting levels before this intersection was constructed. This has increased traffic numbers on subsidiary roads such as Oxford Falls Road, Government Road (Beacon Hill) and Allambie Heights Road, creating dangerous traffic conditions. As yet, we have not seen Government planning with respect to an increase in Public Transport Capacity to allow this increase in residential numbers. There is also a definite lack of long term planning with regards to Sporting Ovals, increase in schools (schools on the Northern Beaches are already nearing capacity), and especially, no long term planning/ investment in green recreation areas such as Mountain Bikng, children friendly cycling with separation from road traffic, bushwalking and Reserves. The increased stress on the Bantry Bay Road area, which has some excellent trails for walking and Mountain Bike areas, will only serve to decrease general well-being and health levels of Borthern Beaches residents.

I agree to the above statement

Yes