



Our ref: DOC21/845240

Luke Johnson
Place, Design and Public Spaces
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear [REDACTED]

Subject: EES comments on

Thank you for your email of 21 September 2021 requesting advice on the draft Frenchs Forest Place Strategy and the Planning Package.

The Environment, Energy and Science Group (EES) has reviewed the draft Strategy and relevant documents from the Frenchs Forest Planning Package and provides its recommendations and comments at Attachment A.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on [REDACTED] or at [REDACTED]

Yours sincerely

[REDACTED]
12/10/21

Susan Harrison

**Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation**

Subject: EES comments on draft Frenchs Forest 2041 Place Strategy and Planning Package

The Environment, Energy and Science Group (EES) has reviewed the following documents:

- Draft Frenchs Forest 2041 Place Strategy – July 2021 (The Strategy)
- Frenchs Forest Explanation of Intended Effect (EIE) – July 2021
- Draft Frenchs Forest Green Plan (Green Plan) – December 2020
- Flooding and Stormwater Study – 12 November 2018
- Frenchs Forest Urban Tree Canopy Audit – November 2020
- Ordinary Council Meeting of 28 September 2021

and provides its comments below.

EES notes *Frenchs Forest 2041* covers the Frenchs Forest Precinct (Precinct) - Phase One of Council's Hospital Precinct Structure Plan and includes the existing Forest High School site and Northern Beaches Hospital site.

The EIE notes a State Environmental Planning Policy (SEPP) is proposed to amend the *Warringah Local Environmental Plan 2011* (Warringah LEP 2011). The proposed amendments to the LEP will implement new planning controls for the Precinct, in accordance with *Frenchs Forest draft Place Strategy 2041*. The EIE indicates the proposed SEPP will be supported by a site-specific development control plan (DCP), which is being exhibited concurrently with this EIE by Northern Beaches Council. EES has not received a copy of the DCP for review.

Biodiversity

The Strategy has not assessed the biodiversity values of the Precinct. The Strategy has not addressed the biodiversity values of the new school site at 187 Allambie Road, Allambie Heights, which is around 1km south east of the Precinct, nor has it assessed how future development of this Precinct and the new school site will avoid and minimise impacts on biodiversity values. Such documents should have been provided as part of this Strategy.

The Precinct includes remnant bushland including an endangered ecological community - Duffys Forest Ecological Community in the Sydney Basin Bioregion, significant vegetated corridors, and threatened species habitats.

Duffys Forest is listed as an endangered ecological community (EEC) under the *Biodiversity Conservation Act* (BC Act) and is also identified as an entity at risk of a serious and irreversible impact (SAII) (www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/biodiversity-offsets-scheme/serious-and-irreversible-impacts).

The Strategy makes no mention of this EEC occurring in the Precinct. EES notes the draft Green Plan and the Urban Tree Canopy Audit shows "endangered vegetation" occurs along the eastern boundary adjacent to Wakehurst Parkway and part of the southern boundary of the Northern Beaches Hospital site. The other remaining native vegetation on the site is mapped as "remnant native vegetation" (see Figure 5 in the Tree Canopy Audit and Figure 12 in the Green Plan).

The OEH Profile for Duffys Forest ecological community notes the "estimated original extent was approximately 1450 ha, of which less than 16%, or approximately 240 ha, remains". Much of the remaining amount of Duffys Forest is highly fragmented, in small unconnected patches and is subject to degradation from human disturbances, weeds, and other processes.

The Place Strategy highlights the importance of the bushland to the local community. However, EES notes that no biodiversity studies have been completed to inform the Strategy. Biodiversity is mentioned in the Urban Tree Canopy Audit but this document has a different focus and therefore isn't a substitute for a biodiversity assessment. EES considers a biodiversity assessment should have been completed for this Strategy, using Stage 1 of the Biodiversity Assessment Method

EES notes that Figure 6 in the Biodiversity Assessment Report from the Northern Beaches Hospital Connectivity and Network Enhancements EIS shows that Duffy Forest EEC occurs along the western boundary of the site (see below). It is noted the Urban Tree Audit maps this vegetation as remnant native vegetation/planted native/exotic trees rather than endangered vegetation. A biodiversity assessment would provide clarity on this.

A scaled plan should be provided which overlays the biodiversity values in the Precinct including remnant Duffys Forest; hollow bearing trees etc; the proposed zoning; the location of the proposed open space/parks, walking/cycling paths and picnic areas etc.

Vegetated corridor along the Wakehurst Parkway

The Strategy states it is proposed to rezone the hospital site from R2 Low Density Residential to SP2 Infrastructure (Hospital) (page 34). Comparing the existing zoning map (Figure 3) with the area that is proposed to be zoned SP2 shows that the eastern boundary of the precinct along Wakehurst Parkway is currently partly zoned RE1.

The draft Green Plan states, “the eastern boundary of the Study Area is currently characterised by the Hospital” and it makes reference to “mature trees on the Wakehurst Parkway boundary” (section 3.3.1, page 19). It should be noted there is currently a vegetated corridor along the Wakehurst Parkway, which extends to the north of the site and on the other side of Warringah Road to the south. This vegetation includes the endangered ecological community, Duffys Forest. The SSI approval for the Northern Beaches Hospital required the retention of a portion of land alongside Wakehurst Parkway to retain this vegetated link. The proposal includes the rezoning of this corridor from RE1 to SP2, which is likely to result in removal of this vegetation and break this vegetated link. EES does not support the proposed rezoning of the remnant Duffys Forest to SP2. This link is identified as a Priority 1 vegetation corridor in the Warringah Natural Area Survey – Vegetation History and Wildlife Corridors (Warringah Council 2005).

While the EIE notes the vegetation along Wakehurst Parkway is protected under existing legislation and is subject to a vegetation management plan, ensuring it will be retained on site. EES considers the section of this RE1 zone that contains Duffys Forest should be zoned E2 – Environmental Conservation to reflect the significance of this vegetation and to ensure it continues to be protected.

The Green Plan Vision Statement includes three overarching principles statements that address open space for recreation, open space for biodiversity and urban tree canopy. The principle for ‘open space for biodiversity’ is “protect existing and create new biodiversity corridors to enhance the natural identity of the Precinct and provide a range of environmental benefits” (section 4.1). It also refers to strengthening of biodiversity corridors and urban tree canopy across the precinct” (section 4.3, page 36). Based on the Structure Plan in the Strategy it is unclear where these proposed ‘new biodiversity corridors’ are proposed to be located within the Precinct. The Structure Plan needs to be amended to clearly identify this and details are required. Section 5.2 in the Green Plan states “The plan recognises the bushland along Wakehurst Parkway as a biodiversity corridor which requires protection and enhancement”. The Green Plan also refers to increasing canopy and co-locating open space throughout this corridor and to providing access links through the Wakehurst Parkway Biodiversity Corridor. (Section 5.3). EES agrees that the vegetated corridor along the Wakehurst Parkway should be protected and enhanced but does not support co-locating open space throughout this corridor (page 41).

Section 5.5 of the Green Plan includes a visionary initiative (20 years and beyond) to “Re-vegetate the biodiversity corridor site on the corner of Wakehurst Parkway and Warringah Road, which was cleared as part of infrastructure works for a temporary construction site, to better connect biodiversity corridors that are currently fractured” (page 50). It is unclear if these works are now

completed and if so, why the revegetation is to be undertaken in 20 years and beyond and not sooner.

The guiding principles for nature and culture in the Green Plan should include protection and enhancement of biodiversity corridors, to improve likelihood that the bushland setting will remain viable in the long term

Item 9 in Figure 16 of the Green Plan is 'development of new open space'. This patch of remnant bushland should be retained as bushland given its significant connectivity values and not developed and EES recommends it is rezoned to E2.

Western boundary of the Precinct

The Structure Plan (Figure 2) in the Strategy shows mixed use development is proposed along the western boundary of the Precinct. The proposed Land Zoning map in the Strategy however shows part of the western boundary is proposed to be zoned RE1 Public Recreation (see Figure 5, page 34). The draft Green Plan also shows green open space (park, bushland) is proposed along the western boundary (Figure 17) but the Structure Plan does not indicate open space area is proposed to be located here, nor does Figure 1 in the EIE.

EES seeks clarification as to whether the western boundary is proposed to comprise mixed use development or open space. The Structure Plan and the Land Zoning map in the Strategy need to be consistent with each other in this regard. If open space is proposed along this boundary the Structure Plan should be amended to depict this.

The section on the Town Centre notes "public areas will embody the area's character, and will include: "the Forest Parkland, a 5,500 sqm urban bushland and adventure play area, with walking and cycling paths and picnic areas" (page 24). It is not clear if the adventure play area, walking and cycling paths and picnic areas are proposed to be located within any remnant vegetation. EES considers such uses should be located outside any remnant vegetation, it should not be used for open space purposes. The section titled 'The Civic Heart' indicates it will be the central gathering place of the town centre, featuring the Village Green and the Forest Parkland.

EES recommends that any 'remnant native vegetation' which occurs near the western boundary of the Precinct (as shown in Figure 12 of the draft Green Plan) is zoned E3 rather than RE1, and it is not used for mixed use, or for recreational purposes.

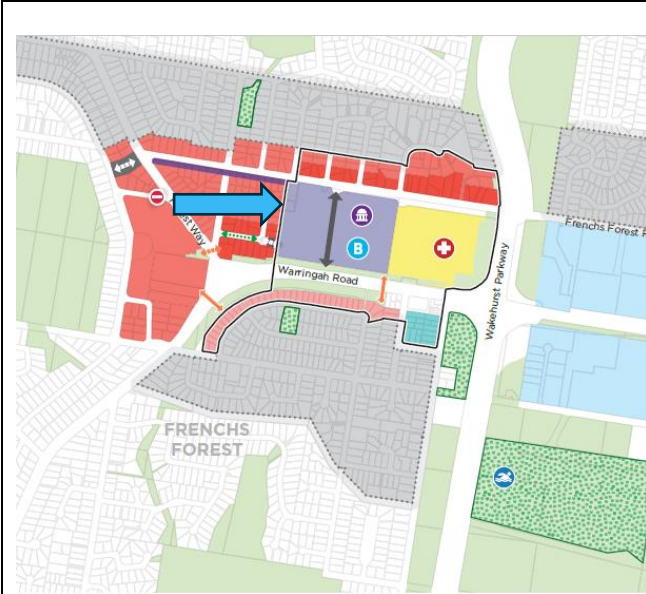
Vegetation to the north and south of Warringah Road

EES notes the draft Green Plan shows "endangered vegetation" occurs along part of the southern boundary (Figure 12) and Figure 6 in the Biodiversity Assessment Report from the Northern Beaches Hospital Connectivity and Network Enhancements EIS shows that Duffy Forest Ecological Community occurs to the north and south of Warringah Road. Council's Ordinary Meeting of 28 September 2021, however, indicates the southern boundary has been cleared of mature vegetation and this has been replanted.

Figure 3 in the Strategy shows the vegetation to the north of Warringah Road is currently largely zoned RE1. To the south of Warringah Road, the vegetation is also currently zoned RE1. The proposed Land Use Zoning (Figure 5) in the Strategy proposes to rezone the vegetation from RE1 to SP2 north of Warringah Road where the road adjoins the hospital site and retain the existing RE1 zoning along the remainder of the northern side of the road. To the south of Warringah Road, it is proposed to be rezone the RE1 zoned vegetation to SP2.

EES notes the Structure Plan (Figure 2) in the Strategy shows open space is proposed to be retained to the north and south of Warringah Road. As noted above the Structure Plan and the Land Zoning map in the Strategy need to be consistent with each other.

The Northern Beaches Ordinary Council Minutes of 28 September 2021 recommends rezoning the vegetation along Warringah Road which is currently zoned RE1 to E3 – Environmental Management if the zoning of this part of the land changes. EES supports rezoning the non-threatened vegetation along Warringah Road to E3 to protect, manage and restore this vegetation rather than rezoning it to SP2, or retaining the existing RE1 zone. Any remnants of Duffys Forest along Warringah Road should be zoned as E2.



Source: Figure 2 (ospital Precinct Structure Plan) in the Strategy



Source Figure 6 in the Biodiversity Assessment Report for the Northern Beaches Hospital Connectivity and Network Enhancements EIS



Source Figure 3 – Existing zoning from the Strategy

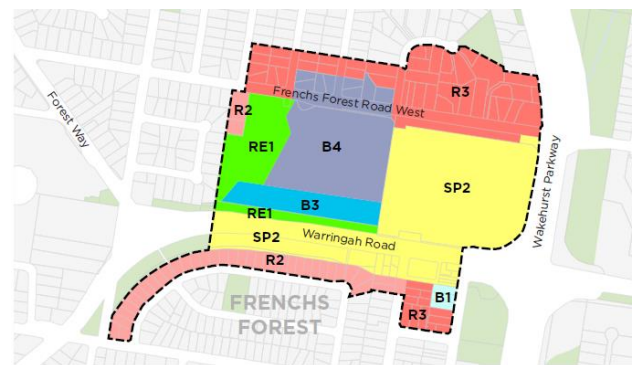


Figure 5: Land zoning



Source: Figure 5 Proposed Land Zoning in the Strategy

Asset Protection Zone requirements

Any Asset Protection Zone requirements for future development of the Precinct should not be located within the remnant areas of Duffys Forest /remnant native vegetation but within the development footprint.

Planting /landscaping in the precinct

The Strategy states “proposed amendments to Warringah LEP will introduce minimum areas for parkland and deep soil planting for vegetation in the new town centre”. EES recommends any planting /landscaping in the Precinct and street tree planting consists of a mix of local native provenance species and the DCP includes controls regarding this.

Urban Tree canopy

The draft Green Plan indicates an additional 732 trees will be planted within Phase One of the Precinct. EES is concerned that it is assumed that no existing trees will be retained within private land, particularly as the Green Plan notes a high proportion of the trees within the Study Area are currently large and mature (section 3.4.3). Future development should avoid removing existing remnant native trees and these should be retained on both public domain and private land to protect and enhance the existing character of the area. Large trees should be retained wherever possible for habitat protection.

Impact of increasing the population

The Green Plan notes within 200 metre of the Study Area, there is approximately 4.05 hectares of available, open space including Akora Reserve, Brick Pit Reserve and Rabbett Reserve and these open spaces are mostly utilised as play spaces, bush walking and mountain bike trails. It indicates there is opportunity to embellish these reserves to increase intensity/ capacity of use. It also indicates there is “opportunity to provide new bushland trails within currently inaccessible bushland areas to connect the community with its surrounding bushland” (section 3.4.1, page 26).

The Strategy notes that the Frenchs Forest Precinct could accommodate up to 4360 dwellings and the Green Plan states the expected population for Phase One is 4,684 people. It is unclear what the total estimated population of Phase One, Two and Three is proposed to be. The increased population of over 4500 people for Phase One will significantly increase the number of people and companion animals potentially using/impacting remnant vegetation on site and the surrounding bushland reserves for open space/recreational purposes.

The increase in people using the bushland reserves and proposed new trails will place additional pressure on these reserves and impact native flora and fauna. The Strategy should assess the impact of increased numbers of people/companion animals potentially using the remnant vegetation on the site and the surrounding bushland reserves. EES considers it is important that adequate open space is provided within the Precinct to reduce pressure on the surrounding reserves and the habitat that these areas provide.

Any new walking trails should be located on the outside edge of the bushland reserves to minimise impacts caused by people and companion animals disturbing EEC, native flora and fauna. This is consistent with the North District Plan which includes an Action 66(c) “Protect and enhance biodiversity by (c) managing urban development and urban bushland to reduce edge-effect impacts” (see Planning Priority N16 Protecting and enhancing bushland and biodiversity, page 102-103 of the District Plan).

EES recommends:

- the number of walking trails proposed to be located within existing native vegetation in the Precinct and the surrounding bushland reserves is minimised
- a perimeter path is located between the remnant vegetation in the Precinct to reduce edge-effect impacts, such as the mown lawn / weeds escaping and invading into the remnant
- the location of the proposed walking trails is assessed in terms of human/companion animal disturbance of native flora and fauna including threatened species and their habitat
- details are provided on the proposed widths of the walking trails and the materials used to construct the walking trails (ie boardwalks, gravel, asphalt, concrete, grated etc)

The materials used to construct the walking trails should minimise interference with the connectivity of native vegetation.

The Strategy indicates *Frenchs Forest 2041* looks to build upon the already established character of Frenchs Forest to guide and shape the development of the new town centre and the wider precinct and it notes that one of the design principles to provide the foundation to guide the renewal of the precinct while maintaining and enhancing the area's local character includes:

- preserve and integrate existing environmental assets

The *Frenchs Forest 2041 Strategy* does not appear to be entirely consistent with this design principle to “preserve and integrate existing environmental assets”. The Objectives of the Strategy also include Objective (7) which aims to “Install green infrastructure, create green spaces, reduce heat island effect, reduce the environmental footprint, enhance ecosystems”. The Strategy also states that “mature trees are retained and the area's characteristics protected”.

New site for the Forest High School

The Strategy notes the existing The Forest High School is proposed to be relocated to a new site at 187 Allambie Road, Allambie Heights. Council's Ordinary meeting minutes of 28 September 2021 notes that most important biodiversity values are located outside of the precinct area (town centre) but close to and within areas identified for the future school site, embellished open spaces and jobs growth areas.

EES notes the proposed school site contains mapped Duffys Forest ecological community. All efforts should be made to avoid direct and indirect impacts on this endangered community. In addition to undertaking a biodiversity assessment of the Precinct, the Strategy should have also undertaken an assessment of the new school site given that Duffys Forest EEC is mapped as occurring on the site. Details should have been included in the Strategy on this assessment, particularly as the Strategy indicates that the relocation of The Forest High School to the Allambie Heights site creates the space for a new town centre in the Precinct. It is important the new site is appropriate for relocating the school to and this will not have an adverse impact on biodiversity values.

Flooding

EES advises it would be beneficial to be clear about any trunk drainage upgrades required for the precinct. This would provide a basis for the next stages of planning and design. The recommended trunk drainage augmentation(s) should be scoped, modelled and presented. This item is listed in the stormwater and flooding report scope, but the recommendations section states only that further studies would be required to size the upgrade(s).

End of Submission