

26 October 2021

TfNSW Reference: SYD13/01227/10

Mr Brendan Metcalfe
Director, North District
Greater Sydney, Place & Infrastructure
Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Lauren Templeman

Dear Mr Metcalfe,

DRAFT FRENCHS FOREST PLACE STRATEGY

Transport for NSW (TfNSW) appreciates the opportunity to comment on the above draft Place Strategy which was placed on public exhibition by the Department of Planning, Industry and Environment (DPIE) from the 23 July to 3 September 2021.

We note that a SEPP is proposed to amend the *Warringah Local Environmental Plan 2011* (Warringah LEP) to implement new planning controls for the Precinct in accordance with *Frenchs Forest draft Place Strategy 2041*. These proposed amendments aim to facilitate a new town centre on the Forest High School site (with a new relocated school), new public open space, more than 2,000 new homes and 2,000 new jobs through:

- rezoning land to B4 Mixed Use, R3 Medium Density Residential, B1 Neighbourhood Centre and RE1 Public Open Space;
- rezoning the Northern Beaches Hospital site from R2 Low Density Residential and RE1 Public Recreation to SP2 Infrastructure, consistent with the approved use;
- increasing maximum building heights, from 8.5m to a range of heights from 11m to 40m;
- introducing maximum floor space ratio controls, ranging from 0.9:1 to 2.9:1;
- identifying additional permitted uses in Schedule 1 of the LEP;
- identifying land to be acquired for future local roads on the land reservation acquisition map;
- identifying the Frenchs Forest Precinct as a Key Site - including the labelling of Site A, B, C and D within the precinct;
- introducing new site-specific provisions for Site A (Town Centre Site) – including adequate transport infrastructure, design excellence, minimum deep soil and minimum open space requirements
- introducing minimum site area requirements and minimum frontages for certain types of residential development; and
- introducing a provision allowing an exception to the minimum subdivision lot size for attached dwellings and semi-detached dwellings for Site C.

To support the proposed SEPP, we note that a site-specific development control plan (DCP) was exhibited concurrently by Northern Beaches Council, and it is proposed to reference the draft DCP in Warringah LEP so that any future development in the town centre demonstrates consistency with the site-specific DCP which addresses matters such as:

- public domain and connectivity;
- building separation and setback requirements;
- site layout, built form and design;
- building use;
- active frontages;
- vehicle access and parking; and
- sustainability.

We also note that draft Frenchs Forest Special Infrastructure Contributions (SIC) supports the strategic objectives of the draft place strategy and the SIC will contribute up to \$37.3 million towards the cost of infrastructure including:

- education;
- roads;
- public transport; and
- active transport and green links.

We have highlighted that some of the costings in the draft SIC are not considered adequate, and concern over funding for necessary upgrades is further complicated by the lack of certainty around the contributions reform currently underway, which may further impact on the ultimate contributions collected towards infrastructure required to support the proposed uplift in Frenchs Forest. Up-front clarity about whether the identified infrastructure will actually get funding (including any shortfall from the estimates in the draft SIC) through the proposed revised process, and when it is needed to enable progression, is requested. This issue and its potential impacts requires careful consideration in terms of the viability of the proposed growth and the necessary integration of transport and planning.

The relevant exhibited documentation has been reviewed by TfNSW, and comments are provided for DPIE's consideration at **Attachment A**, and also at **Attachment B (Comments Register)**. Key matters of concern that we require clarity on at this stage of the process relate to the following:

- The need to work together to resolve public transport and active transport infrastructure and services, including funding arrangements.
- The need to collaboratively work together with Council to resolve local access matters and infrastructure to support the proposed Town Centre.
- Resolving the scope, cost and funding arrangements for the upgrades at the Forest Way / Naree Road intersection.

TfNSW is happy to collaborate with DPIE and Council in the development of a multi-modal "integration plan" which considers changes from the Beaches Link Project.

Should you have any questions or further enquiries in relation to this matter, please don't hesitate to contact Senior Land Use Planner – Andrew Popoff on 8849 2180 or via email: Andrew.Popoff@transport.nsw.gov.au

Yours sincerely



Cheramie Marsden
Senior Manager Strategic Land Use
Land Use, Network & Place Planning, Greater Sydney

Attachment A: TfNSW comments on the Draft Frenchs Forest Place Strategy
(Provided in draft 29 September 2021 and finalised 31 October 2021)

Beaches Link matters

TfNSW agrees with the sentiment of the Transport Strategy; in that the development of an integrated transport and land use strategy / “integration plan” focussed on reducing private vehicle reliance will be key to enabling / accommodating the proposed development (and future growth more generally) - noting that the proposed development will create significant transport issues if existing travel behaviours in the area do not materially change.

The Transport Strategy seems to suggest that Beaches Link would have responsibility for an “integration plan” for the precinct. **This is not the case.** The scope of the Beaches Link in the Frenchs Forest area addresses Beaches Link project impacts and expected background growth (only).

Notwithstanding, the Beaches Link team (and broader TfNSW) is happy to collaborate with DPIE and Council in the development of a multi-modal “integration plan”. We would expect that ownership of such a plan would be the responsibility of the proponents for the rezoning (i.e. either DPIE or Council).

Any “integration plan” should look at all modes / scope holistically to avoid particular works precluding others, or requiring rework down the track. As an example, if upgrades to Wakehurst Parkway north of the precinct are envisaged (which we believe has been a Council aspiration for some time), such works should be considered in the context of the long-term integration plan. A holistic and comprehensive plan should also seek to minimise community impacts during construction – e.g. consolidate and deliver all scope for a particular area in one hit.

The Transport Strategy talks about future rail services to/from the Northern Beaches, but generally omits discussion of the potential for express bus services via the Beaches Link. This is inconsistent with TfNSW / NSW Government planning for the Northern Beaches – express buses via the Beaches Link are a much more realistic short-medium term transport solution, and it would be more logical to discuss this as a possible mass-transit solution.

Although it is not presented in the main body of the Transport Strategy, for completeness and the avoidance of doubt, the Beaches Link project team would strongly oppose any new vehicular connections between the precinct and Warringah Road (which is consistent with the general TfNSW position). The section of Warringah Road between Forest Way and Wakehurst Parkway will be a key strategic connection to/from the Beaches Link, and any new connections on this section would directly impact the works proposed by / benefits created by the Beaches Link.

Buses / Public Transport

We note that certain content in the Transport Strategy is outdated. There were a number of bus servicing changes introduced in December 2020 that have not been picked up such as the cancellation of the 136, 169 and E60 and the introduction of the 166 and 160X. We also note that the Transport Strategy has not included the 155 Bayview Garden Village to Frenchs Forest bus, route which was introduced when the Northern Beaches hospital was opened in October 2018.

The information provided within Section 3.2.2 of the Transport Strategy is also out-of-date, as it does not appear to have picked up the completed Hospital roadwork improvements.

We also note Council's concerns regarding bus service provision and can advise that the area is currently well serviced by routes, with connections from Manly (2 routes) Belrose (2 routes) Chatswood (2 routes). The current network provides reasonably good connectivity to the area. However, we do acknowledge that increased frequency on some routes will be needed as demand increases.

In addition, the Transport Strategy and the Draft Place Strategy need to be updated to reflect the Future Transport 2056 Greater Sydney Network refinement, which confirms that 2 rapid bus routes will serve Frenchs Forest in 2036 (i.e. Dee Why to Chatswood via Frenchs Forest and Frenchs Forest to North Sydney). See weblink below:

<https://future.transport.nsw.gov.au/future-transport-strategy/greater-sydney-network/greater-sydney-network-refinement>

Further comments are also provided within **Attachment B (Comments Register)**.

Traffic Management and Infrastructure

We have noted some conflicting/confusing information presented within the various exhibited reports, particularly regarding proposed intersection treatments along Frenchs Forest Road West - namely relating to the Frenchs Forest Transport Strategy, the Proposed Special Infrastructure Contribution Frenchs Forest (July 2021) and the Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011. These matters are discussed in further detail below:

Frenchs Forest Road West / Main Town Centre Access Road:

It is unclear whether this intersection is proposed to be signalised. Previous reviews of Jacobs' modelling files back in 2018 / 2019 had identified that this intersection was signalised in some scenarios. We note Table 9.1 – Implementation Plan (Item R1) of the Frenchs Forest Transport Strategy states: "*Provision of internal town centre street network including signalised intersection with Frenchs Forest Road West*", and also understand that Council's submission recommends signalising this intersection.

TfNSW would strongly object to any new traffic signals along Frenchs Forest Road West at the proposed Main Town Centre Access Road on road safety grounds (i.e. see through effect), given this would mean that there would be three sets of signals spaced at about 90m from each other (i.e. Gladys Ave – Main Town Centre Access Road - Bluegum Cres West).

We also note that Figure 7 within the Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011, illustrates this intersection as a priority control intersection.

Frenchs Forest Road West / Sylvia Place:

We note that Item R2 within the Proposed Special Infrastructure Contribution Frenchs Forest (July 2021) states: "*Signalised intersection at Frenchs Forest West Road/Sylvia Place*", and also understand that Council's submission recommends signalising this intersection.

TfNSW would strongly object to any new traffic signals along Frenchs Forest Road West at Sylvia Place on road safety grounds (i.e. see through effect), noting that this would mean that there would be two sets of signals spaced at about 80m from each other (i.e. Sylvia Place - Bluegum Cres West).

Traffic Signal Warrants for any new Signalised Intersections:

DPIE is advised that TfNSW has exclusive approval powers under Section 87(4) of the *Roads Act, 1993* to the installation of new traffic signals, and that their installation is dependent on general warrants in accordance with Roads and Maritime requirements for Traffic Signal Design – Section 2 Warrants. It must be emphasised that these are a guide only. All traffic data should be analysed and alternative treatments considered to determine the optimum solution.

Link below:

<https://legislation.nsw.gov.au/view/html/inforce/current/act-1993-033#sec.87>

Frenchs Forest Road West / Bluegum Cres West:

We note that Section 5.5.3 of the Frenchs Forest Transport Strategy states:

“Based on the above assessment, it is recommended that the Bluegum Crescent (west) access option be investigated further and considered for implementation to support the full development of the Frenchs Forest Planned Precinct. To further increase street capacity and improve pedestrian amenity, measures to improve safety are recommended, including traffic calming measures and / or a reduced speed limit”.

This is illustrated in Figure 5.16 below.

Figure 5.16: Additional access options



TfNSW also notes that Table 5.8 fails to provide any detailed modelling results for this intersection (i.e. Original Layout and Option 2), and does not provide detailed modelling results for the year 2036 or with the Beaches Link.

In order to address the road safety concerns associated with proposing new traffic signals at Frenchs Forest Road West / Sylvia Place and / or Frenchs Forest Road West / Main Town Centre Access Road, TfNSW's preference is to pursue the Transport Strategy's recommendation, which is to utilise the existing signals at Bluegum Crescent West as a "key" enhanced all movements access into the future Town Centre. However, the following matters would need to be addressed if this is ultimately pursued:

- There will be the need for some further detailed localised transport modelling to determine future long term intersection performance, lane storage requirements and associated property needs.
- Reconsideration of the Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011 with regard to the street network function

(i.e. Figure 7 extracted following) and layout for Market Lane (west), which includes other related DCP controls.



- The intersections of Frenchs Forest Road West / Sylvia Place and Frenchs Forest Road West / Main Town Centre Access Road would be limited to a priority control intersection with restricted movements.
- Ensuring all of the above are satisfactorily resolved between TfNSW, DPIE and Council prior to finalising the Frenchs Forest Place Strategy and proposed SEPP noting that the outcomes of this will influence Council's preparation of a Section 7.11 Local Contributions Plan.

Shared Zones:

TfNSW advises that any proposed shared zone would need to be further considered subject to the proposed laneways being configured to meet the requirements of NSW Speed Zoning Guidelines and TTD 2016/001 - *Design and implementation of shared zones including provision for parking*. The review of the Frenchs Forest Precinct Place Strategy and Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011 should not be taken as an approval for any of the proposed shared zones. We recommend that any wording relating to shared zones stressed they are '**under investigation – not currently approved**'.

Forest Way / Naree Road (additional right turn lane):

The Transport Strategy clearly highlights that this upgrade is needed in the short-to-medium-term, and is driven exclusively by the need to support the Frenchs Forest Precinct Phase 1 rezoning. This Strategy also highlights that there is the need to further investigate the feasibility, scope and effectiveness of this intersection upgrade.

However, the Proposed Special Infrastructure Contribution Frenchs Forest (July 2021) allocates approximately \$4.8Million towards the funding of the proposed additional right turn lane (i.e. dual right turn lane) from Forest Way into Naree Road. Previous preliminary investigations conducted by the former Roads and Maritime Services in 2019 led to advice being provided to DPIE that this funding allocation is only a fraction

of the likely total cost to implement this additional right turn lane. These works would also involve road widening at/near the intersection, partial and possibly full property acquisitions, as well as utilities relocation.

Therefore, TfNSW recommends that DPIE not finalise the Frenchs Forest Place Strategy and proposed SEPP which will amend the Warringah LEP 2011 until the above issues are satisfactorily resolved. This includes a NSW Government commitment to ensure that this intersection upgrade is fully funded and delivered in the short-to-medium-term.

If DPIE chooses to progress, then further transport modelling of the Frenchs Forest Precinct Phase 1 rezoning would be required to determine the dwelling and town centre uplift yields that could be reached (i.e. yield threshold) without this upgrade taking place, and specify these revised yields via a new clause within the proposed SEPP which will amend the Warringah LEP 2011. This new clause should state something similar to the following:

- To ensure development does not have an adverse impact on the road network, development consent must not be granted to development that results in more than XX per cent development capacity of the Frenchs Forest Precinct Phase 1 (i.e. approximately XXXX dwellings and XX,000m² of commercial and retail floor space) until the transport infrastructure needs (upgrade of Forest Way / Naree Road intersection – dual right turn lanes) are implemented.

Funding and timeframes would still need to be resolved.

Forest Way / Naree Road (Ultimate Upgrade):

TfNSW acknowledges that the full proposed works would also include:

- Extension of Naree Road to Grace Avenue (i.e. fourth leg), in order to support development uplift on the western side of Forest Way.
- Removing access between Forest Way and the eastern end of Russell Avenue.

However, the full proposed works are not considered necessary to support the traffic impacts of the development associated with this Frenchs Forest Precinct Phase 1 rezoning.

The full proposed works do require further investigated (as needed) in order to support any future development / rezoning west of Forest Way, such as those proposed in the full *Northern Beaches Hospital Precinct Structure Plan*. This will require additional detailed modelling work for the signalised extension of Naree Road to Grace Ave in the future in order to determine the most suitable arrangement that minimises delay to Forest Way and addresses potential storage capacity issues within the Naree Road extension.

Wakehurst Parkway / Aquatic Drive proposed signalisation:

We note that the Transport Strategy discusses the relocation of The Forest High School and the proposed signalisation of Wakehurst Parkway / Aquatic Drive to support the additional traffic generated by The Forest High School relocation. This was however, based on the Forest High School relocating to the Warringah Aquatic Centre Site, with the new site now being at 187 Allambie Road, Allambie Heights.

<https://www.schoolinfrastructure.nsw.gov.au/projects/f/the-forest-high-school-relocation.html>

We also acknowledge that the proposed signalisation of this intersection is not required to support the Frenchs Forest Precinct Phase 1 / Stage 1 rezoning as illustrated within the Explanation of Intended Effect.

However, TfNSW requests (as part of any future development application for The Forest High School relocation), that the necessary detailed evidence is provided to TfNSW (i.e. demonstrated evidence for Traffic Signal warrant requirements being met and associated detailed intersection modelling). TfNSW will review this matter at the appropriate time in the future.

Active Transport:

Council's submission:

We note Council's recommendation that the Department liaise with TfNSW to identify the future pedestrian and cyclist bridge across Wakehurst Parkway in the draft Frenchs Forest Place Strategy.

DPIE are advised that the Beaches Link Team has been communicating with both the Department of Education and Northern Beaches Council on the proposed new pedestrian / cycle bridge, and its design and alignment across Wakehurst Parkway in the vicinity of the Aquatic Drive intersection as part of the Beaches Link project. This matter can also be considered further within the development of the multi-modal "integration plan" mentioned on page 3 of this response.

Frenchs Forest Transport Strategy:

- Section 3.2.3 Active Transport Network
We advise that TfNSW (via the Beaches Link) is proposing a separated shared path along the eastern side of Wakehurst Parkway between Warringah Road and Kirkwood Street (Seaforth).

We also recommend that the active transport network facility types in the precinct be selected with reference to TfNSW's Cycleway Design Toolbox and the Walking Space Guide (see links below), which provides guidance on high quality walking and cycleway outcomes.

[Walking Space Guide](#)
[Cycleway Design Toolbox](#)

- Section 3.3 Movement hierarchy
A place assessment needs to be undertaken on the existing road network in accordance with [The Practitioners Guide to Movement and Place](#). The following statement below within this section reflects that the report is incomplete on this matter, "*There is very limited place functionality in the existing network. As a result, a standard Movement and Place assessment of the existing network has not been undertaken*".
- Section 5.5.1 The Forest High School relocation
Noting that the development will generate walking, bus and cycling trips to and from the surrounding area, are any further improvements required to encourage, for example, a 13 year old living in a proposed medium density unit north of Frenchs Forest Road, to walk or cycle to the new proposed High School location?

- Section 5.7 Movement and Place
It should also be noted that the terminology with “Vibrant Streets” is at present referred to as a ‘Main Street’ within *The Practitioners Guide to Movement and Place*.

Should Naree Road - Frenchs Forest Road (west of Sylvia Place) be a movement corridor or a Vibrant Street / Main Street? Could the impacts on the amenity walking, cycling and place outcomes be improved to make it a more comfortable place to walk and cycle and live (in the proposed apartment buildings that will form latter stages of the Frenchs Forest Precinct)? Reducing traffic volumes (i.e. discouraging rat-running) reducing speed and planting trees are common methods for improving walk and cycle rates. Such improvements would be consistent with statement in the Transport Strategy (P.22):

The planning of future transport infrastructure and services in the Frenchs Forest precinct will need to be undertaken in a manner which promotes non-car modes and seeks to reduce the currently high level of car use for both incoming and outgoing trips.

- Section 7 Active Transport Network - Figure 7.1: Walking and cycling improvements under construction (Roads and Maritime).
Is the proposed network a comfortable place to walk and cycle as defined in the comments provided above? Reducing traffic volumes / speed limits (where possible), and planting trees are common methods for improving streets. It is noted that lower speed limits to promote walking and cycling trips have been used in areas with high numbers of pedestrians on local roads, which includes the following scenarios:
 - Suburban shopping strips.
 - Areas where land-use or facilities generate significant pedestrian traffic (eg. beach-side/park-side reserves).
 - Business areas generating significant pedestrian traffic such as medical centres, hospitals, and Government service agencies.
- Section 8 Travel demand management
Any Travel Demand Management measures should also encourage increased walking and cycling.

Street Tree Strategy:

Tree plantings need to take into account clearances for bus movement and passenger access requirements at bus stops.

Car Parking Rates / Travel Demand Management:

The Transport Strategy states that car parking controls can be used as a policy tool to manage travel demand and reduce dependence on private vehicles, and that the approach to recommending parking rates for Frenchs Forest is aimed at promoting non-car modes.

However, the proposed maximum residential parking rates within the Transport Strategy (illustrated below) and Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011 slightly undermine the approach mentioned above.

Land use	Unit	Proposed rate	Warringah DCP 2011 rate
Residential	spaces per 1-bedroom dwelling	0.6	1
	spaces per 2-bedroom dwelling	1	1.2
	spaces per 3 or more-bedroom dwelling	1.5	1.5
	visitor space per dwelling	0.1	0.2
Commercial/ Office	space per 40m ² GFA	1	1
Retail	spaces per 100m ² GLFA	6.1	6.1

The *Guide to Traffic Generating Developments* (GTGD) (2002) for High Density Residential suggests the following rates within Metropolitan Sub-Regional Centres:

- 0.6 spaces per 1 bedroom unit.
- 0.9 spaces per 2 bedroom unit.
- 1.40 spaces per 3 bedroom unit.

At a minimum, to reduce dependence on private vehicles, TfNSW would encourage the use of the above GTGD High Density Residential parking rates as *maximums* within Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011. Noting that the GTGD is now almost 20 years old and is currently being revised, a further reduction in the maximum rates should be considered in-line with other recent similar developments.

In addition, the Transport Strategy advocates for unbundling and decoupling of car parking for the Frenchs Forest Precinct with the following key recommendations:

- If unbundled parking was to be introduced in the Frenchs Forest precinct, it is recommended that a complementary reduction in parking requirements is considered. For buildings with unbundled parking, a parking rate reduction of 15 per cent is proposed;
- If decoupled parking is to be pursued in the Frenchs Forest precinct, it is recommended that:
 - Parking should be spatially decoupled from buildings where possible.
 - Sites should be identified for decoupled parking to reduce the need for on-site, underground parking.
 - Decoupled parking should be built above ground and managed flexibly as the corridor transitions towards low car ownership and use.

For buildings with decoupled, unbundled parking, a parking rate reduction of 30 per cent on parking rates is proposed. Decoupled parking could be transitioned to other uses when the demand for parking is no longer required, including where new public transport infrastructure is delivered.

Therefore, to facilitate the reduction in private vehicle usage, TfNSW would advocate for the abovementioned recommendations to be included within the Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011. We would be happy to discuss the above further.

Green Travel Plan:

We note that within Section 5.1.2 – Concept Development Application, Requirement 1.2 of the Draft Part G9 - Frenchs Forest Town Centre - Warringah Development Control Plan (DCP) 2011, that there is a requirement for a Green Travel Plan for Precincts 01 to 04. TfNSW are supportive of such a requirement. However, outcomes from a Green Travel Plan can be more successful when targets are imposed and there is a requirement for regular monitoring of the Green Travel Plan. Therefore it is

recommended that Section 5.1.2 – Concept Development Application, Requirement 1.2 of the Draft DCP be amended to also ensure that the Green Travel Plan includes:

- Targets: This typically includes the reduction of single occupant car trips to the site for the journey to work and the reduction of business travel particularly single occupant car trips.
- Travel data: An initial estimate of the number of trips to the site by mode that is required.
- Measures: a list of specific tools or actions to achieve the target.
- An annual or regular survey to estimate the travel behaviour to and from the site and a review of the measures.
- A copy of the Travel Plan must be available to Council on request.

Guidance on the above can be found via the weblinks below:

<https://www.mysydney.nsw.gov.au/travelchoices/tdm>

<http://data.mysydney.nsw.gov.au/files/Travel+Plan+Template.pdf>

http://data.mysydney.nsw.gov.au/files/Travel+plan+review+tips_timing_questions.pdf

Land Reservation Acquisition (LRA) Map:

We require that the integrity of all existing SP2 – Classified Road LRA reservations identified within Council’s current LEP Maps that are part of this precinct be maintained.

We also note and support Council’s concerns within their submission relating to the potential need for further acquisitions within the LRA Map to support any potential additional transport infrastructure requirements which are currently unresolved. Therefore appropriate measures must be implemented (and agreed to between DPIE, TfNSW and Council) to ensure that any (currently unresolved) future transport infrastructure property needs are protected and not compromised by future development.

Transport Infrastructure Contributions:

Should the Frenchs Forest Precinct be rezoned, a supporting contributions mechanism / plan(s) **must** be determined **up-front**, and implemented to obtain developer contributions on an equitable basis towards both local and State transport infrastructure that is needed to support the rezoning, as per the December 2020 ‘Review of Infrastructure Contributions in New South Wales’ Productivity Commission’s recommendations.

In addition, concerns are raised that the details and scope of transport infrastructure and services requirements needed to support the Frenchs Forest Precinct Stage 1 rezoning remain un-finalised. This also includes how the full suite of supporting transport infrastructure will be fully funded.