

3.3 Frenchs Forest State Significant Site Proposal

EXECUTIVE SUMMARY

Purpose

To inform the Council about the State Government's proposal for a Specialised Centre at Frenchs Forest, review the exhibition documents and recommend that Council make a submission in response to the exhibition of the proposal.

Summary

The Minister for Planning has declared a large part of the Frenchs Forest area as a State Significant Site (SSS) under the provisions of State Environmental Planning Policy (Major Development) 2005 (the Major Development SEPP) and has initiated planning investigations into how this can be achieved. Council was notified of this on 17 December 2010, at the start of the public exhibition of the SSS proposal.

The exhibition and submission period was extended from 7 February until 28 February 2011. The Minister at the same time directed NSW Transport to prepare a Transport Management and Accessibility Plan (TMAP) for the proposed centre. The Frenchs Forest community have held two (2) public meetings to discuss the proposal and the Department of Planning have made presentations to these meetings as well as at the Councillor briefing held on 15 February 2011.

Additionally, on 16 February 2011, the Director-General as delegate for the Minister for Planning, declared the proposed Northern Beaches hospital as a Major Project to be dealt with under Part 3A of the Environmental Planning and Assessment Act, 1979.

This report outlines the background history to this issue and discusses the main issues of concern with this specialised centre proposal for Frenchs Forest. The main areas of concern are:-

- Council supports the idea of a specialised centre for Frenchs Forest, predicated on it being in conjunction with construction of the proposed Northern Beaches hospital and also that it is properly investigated and planned before any development occurs;
- Construction of the proposed Northern Beaches hospital is critical and commitment to its construction should be a pre-requisite to any rezoning of Frenchs Forest as a Specialised Centre;
- It is considered that the critical issue with the planning of this proposed specialised centre is its impact upon regional and local traffic management and its impact upon the limited public transport services available. The TMAP, which is in its initial stages, should be completed and approved by all involved parties, prior to any rezoning of this land for specialised centre development. If this does not occur, then any SEPP amendment should require that the TMAP be completed in conjunction with an overall Master Plan and should be approved prior to any individual precinct Development Control Plan's (DCP's) or individual developments being approved;
- It is considered that in addition to the TMAP, an overall Master Plan for the proposed centre needs to be prepared (excluding residential land). Ideally this should be prepared before any amendment is made to the Major Development SEPP. If not, any SEPP amendment needs to provide for the preparation of this overall Master Plan and that this needs to be prepared and adopted before any individual precinct DCP's are approved and before any development is approved

- Council should have control of all planning for residential development needed as a result of the specialised centre development. Therefore, all proposed land to be zoned R3 -Medium Density Residential, should be excluded from any amendment to the Major Development SEPP for the Frenchs Forest State Significant Site proposal;
- Council should be the authority to determine appropriate surrounding residential densities to support the specialised centre, as part of its detailed LGA wide Housing Strategy, which has been formulated with significant community involvement;
- It is disappointing to see the speed at which this proposal is being dealt with. It is considered that there should have been greater consultation with Council and the community. Also, the Transport Management and Accessibility Plan (TMAP), which has only recently been requested, should have been available at the time of exhibition; and
- As a general comment, the level of detail available for the future development of the area, particularly in the area of traffic management, public transport and open space is considered an inadequate basis upon which to rezone the land for a specialised centre.

Financial Impact

This proposal to designate Frenchs Forest as a specialised centre for the North-East Region will result initially in an increased demand for strategic planning work, followed by increased development assessment demands, along with demands for new assets, infrastructure and Council services. As such, there will be an on-going, and as yet undetermined, financial commitment needed from Council. This will also be accompanied by an undetermined increase in Council's income rates base.

Policy Impact

If this proposal proceeds and Frenchs Forest is zoned as a specialised centre, there will be considerable impacts upon a wide range of Council policies.

RECOMMENDATION OF DIRECTOR STRATEGIC AND DEVELOPMENT SERVICES

- A. That Council endorse the comments included within this report and as outlined in the proposed submission at Attachment E to this report.
 - B. That a copy of this report be forwarded to the Department of Planning as Council's formal submission on the exhibition of the Frenchs Forest State Significant Site Proposal.
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REPORT

Introduction

On 17 December 2010, Council received correspondence from the Department of Planning advising of the exhibition of the Frenchs Forest State Significant Site Proposal.

It advised that they proposed to make amendments to State Environmental Planning Policy (Major Development) 2005 (the Major Development SEPP) 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 also proposed the introduction of development controls (floor space ratio and building heights) and also proposed to list the hospital site and Forest High as critical infrastructure under Schedule 5 of the Major Development SEPP.

The exhibition included the following documents:-

- State Significant Site Study by Cox Richardson;
- Explanation of Intended Effect;
- Draft SEPP Maps;
- Proposed Land Use Table; and
- Preliminary Transport Assessment by ARUP.

A copy of these documents were separately circulated to all Councillors in December, 2010. The exhibition and submissions are due to close on 28 February 2011.

It is noted that the new *Metropolitan Plan for Sydney 2036* was released on 16 December 2010, the day before the start of the exhibition of the Frenchs Forest SSS Study exhibition. The Metro Strategy includes Frenchs Forest as a “Potential Specialised Centre”.

Proposal in Brief

The proposal involves the rezoning of a large area of Frenchs Forest, centred around the existing employment lands and the site for the proposed Northern Beaches hospital. The land subject to the proposed rezoning can be seen at Attachment A.

To facilitate this rezoning the Minister for Planning proposes to insert special provisions into Schedule 3 of State Environmental Planning Policy (SEPP) (Major Development) 2005. In doing so, the subject land will no longer be zoned under Council’s LEP but will be zoned under the Major Development SEPP. The amendment to the Major Development SEPP will also include a series of maps and accompanying clauses which will effect the rezoning of the land and also introduce certain development standards such as floor space ratios and building heights. Full details of the proposed zones and proposed development standards, are detailed in Attachment B.

During the exhibition period, the Minister directed that NSW Transport prepare a Transport Management and Accessibility Plan (TMAP) for the proposed Frenchs Forest Specialised Centre.

Additionally, on 16 February 2011, the Director-General as delegate for the Minister for Planning, declared the proposed Northern Beaches hospital as a Major Project to be dealt with under Part 3A of the Environmental Planning and Assessment Act, 1979.

Explanation of Intended Effect

The exhibition is accompanied by a document called an *Explanation of Intended Effect*. This document states that the Metropolitan Plan for Sydney 2036 nominates Frenchs Forest as a

potential specialised centre and that it is intended to build upon the opportunities presented by the existing employment area and a potential new hospital.

This document states what the NSW Government sees as the advantages in locating a specialised centre in Frenchs Forest, they being:-

- *The area is well located in the sub-region;*
- *It is located on a strategic bus corridor that provides access to other centres in the north-east as well as Chatswood and Sydney City;*
- *It is located at the centre of the east-west corridor and reinforces east-west links between Macquarie Park, Chatswood and Brookvale/Dee Why. This will allow Frenchs Forest to draw off the success of these centres;*
- *It will provide opportunity to further increase the already high level of employment self-containment by capturing some workers that currently leave the subregion daily;*
- *The region's level of self-containment will be improved by the provision of higher density residential areas with close proximity; and*
- *It will contribute to the north-east region's job and dwelling numbers and provide additional retail and commercial floor space without using non-urban lands.*

What is a Specialised Centre?

In the Metropolitan Plan for Sydney 2036 a specialised centre is described as

“Areas containing major airports, ports, hospitals, universities, research and/or business activities that perform vital economic and employment roles across the metropolitan area.”

They typically have a stronger employment or economic function than other centres, with a reduced focus on housing. They also have a walking catchment of approximately 1 km. Examples of existing specialised centres in Sydney include Sydney Airport, Norwest, Macquarie Park, St Leonards, Westmead, Port Botany etc.

Background History

It is necessary to review past history to gain a full understanding of why the State Government is proposing this rezoning, which is briefly summarised below:-

- **Metropolitan Strategy – December 2005**

This 2005 Sydney Metropolitan Strategy established a typology of centres. In Warringah, Brookvale/Dee Why was identified as the Major Centre for the region. Frenchs Forest was not identified as one of Sydney's Strategic Centres. There was also no economic corridor identified linking Dee Why with Macquarie Park. At this stage there was no mention of the need for a new hospital for the North-East Region or at Frenchs Forest.

- **Hospital Announcement – March 2006**

The NSW State Government announced in March 2006 that it had chosen Frenchs Forest as the site for a new Northern Beaches hospital. The site was located on the north-western corner of the major intersection of Warringah Road and Wakehurst Parkway. The press release by the then Health Minister John Hatzistergos, stated that planning was expected to be completed by the second half of 2007, with construction commencing after that.

There is no current time commitment to build the hospital, however the NSW Premier in 2010 announced that \$5.0 million had been included in the budget to recommence planning for the Northern Beaches hospital. On 15 February, 2011 an application was submitted to the Minister for Planning requesting that the proposed hospital be declared an application under Part 3A.

- **Draft North-East Sub-Regional Strategy - July 2007**

The Draft Sub-Regional Strategy was prepared to provide more detailed regional planning to support the Metropolitan Strategy. This document identified the Frenchs Forest employment area as a candidate for intensification, in association with development of the planned Northern Beaches hospital. It also stated that the North East region did not contain any specialised centres, and recognised that Frenchs Forest was an opportunity for one, in association with the proposed hospital. It also included an action (Action NE A2.2.3) which stated:

Warringah Council to consider preparation of a master plan for the Frenchs Forest local area in association with Department of Health, Department of Planning and the Roads and Traffic Authority.

This Draft Strategy has never been adopted as a final document and is currently under review in light of the release of the *Metropolitan Plan for Sydney 2036*.

- **SHOROC Employment Study – March 2008**

This Study was prepared for SHOROC by Hill PDA and was partially funded by the Department of Planning as part of their Planning Reform Funding. It concluded that the SHOROC region had a deficit of commercial and retail space. It came up with a number of principles, which were adopted. These included a principle to:

Promote Frenchs Forest as a Specialised Centre for Health and Technology. It is recommended that the area is designated zone B7 Business Park and FSR's enhanced to encourage investment and business relocation. The provision of services including retail and cultural services and public transport to support the precinct should be carefully addressed in a Master Plan that incorporates the proposed Hospital.

- **A Centre Study for the SHOROC Region – August 2009**

This was prepared by Hill PDA for private clients. This Study concluded that the SHOROC region did not have sufficient zoned land to accommodate projected retail and commercial floorspace demands to 2031. This Study also looked at the capacity of existing centres for growth. It concluded that the Frenchs Forest employment centre had the greatest potential to provide an increase in jobs in the region by 2031 and proposed that Frenchs Forest should be categorised as a potential second Major Centre for the Region.

This report was also submitted to Council in November 2009 as a submission in response to the exhibition of Draft Local Environmental Plan 2009 (the template LEP). As this draft Plan was a translation process, no change was proposed to the draft LEP as a result of this submission.

- **Decision to investigate Frenchs Forest as a Major Centre – January 2010**

In January 2010, the Director-General decided to undertake an investigation to determine whether Frenchs Forest should be identified as a Major Centre. The Department of Planning stated that this decision was based upon the results of the "A Centre Study for the SHOROC Region" by Hill PDA. The investigations were also to form part of the Metropolitan Strategy 2010 Review. By letter dated 1 April 2010, the Department of Planning wrote to Council requesting comments on its specific proposal to designate Frenchs Forest as a potential Major Centre. Council considered this as part of its submission on the Discussion Paper Sydney Towards 2036, as part of the Metropolitan Strategy Review 2010, as detailed below.

- **Sydney Towards 2036 – Metropolitan Strategy Review – March 2010**

Council considered this document at its meeting held on 27 April 2010 and resolved to make a submission. The document did not specifically mention Frenchs Forest, but given the letter from the Department of Planning, Council made detailed submissions in relation to the proposal to identify Frenchs Forest as a Major Centre.

In summary, Council's submission was that Frenchs Forest was not suitable as a Major Centre, being too close to the existing major centre of Brookvale/Dee Why, and not having a sufficient residential population to support major centre functions. However, Council acknowledged that if the proposed development of the northern beaches hospital proceeded, then it had potential to develop as a specialised centre.

Therefore, Council's submission was that it was more appropriate to investigate future development of the Frenchs Forest precinct as a specialised centre, based on the new hospital proposal. Full details of Council's submission, as it related to the Frenchs Forest proposal, can be seen at Attachment C.

- **Metropolitan Plan for Sydney 2036**

The updated Metropolitan Strategy was released by the NSW Government on 16 December 2010. It included within it, the identification on two (2) new potential specialised centres for Sydney, one of which was at Frenchs Forest. This new potential specialised centre was focussed upon land near the intersection of Warringah Road and Wakehurst Parkway, being the location of the potential new hospital.

- **Shaping our Future – SHOROC - 2010**

This document indicated that growth in the SHOROC region would be focussed around four (4) key areas, one of which was Frenchs Forest *as a new specialised centre for housing, jobs and health with additional dwellings and job capacity, focussing employment clusters around the new hospital and health services*. This document also listed the immediate construction of the level 5 Northern Beaches hospital as a priority for the region.

This strategic document was adopted by Council at its meeting held on 28 September 2010.

Public Response

In response to the Department of Planning's exhibition of this State Significant Site Proposal, the community have held two (2) public meetings – one on 20 January and a second on 16 February 2011. The Department of Planning attended both meetings.

As a result of discussions at the first public meeting the Department of Planning extended the exhibition and submission time until 28 February 2011 and also directed NSW Transport to prepare a Transport Management and Accessibility Plan (TMAP). This was in response to resident concerns about the lack of information on the possible impacts of the proposed specialised centre on traffic and transport infrastructure in the area.

The main concerns expressed at these meetings related to the ability of existing traffic and transport infrastructure to cope with the proposal, whether the hospital would be built, whether Forest High and Frenchs Forest Primary School would be closed and also the impact of medium density residential development in what is currently a low density residential area.

Discussion of Issues

As is evident from the history outlined above, Council and the SHOROC region generally, have been supportive of a new hospital being built at Frenchs Forest. It has also been acknowledged that upon construction the hospital, then the surrounding employment lands of Frenchs Forest would be ideal for intensification as a health/technology related specialised centre.

However, there are a number of issues and concerns with the current Department of Planning State Significant Site Proposal. A full discussion of major issues can be seen at Attachment E which constitutes Council's proposed submission to the Department of Planning on this proposal.

A summary of the main issues and concerns however, are provided below:-

- **Transport and Traffic Management**

There is a clear and stated lack of transport and traffic analysis accompanying this State Significant Site proposal. The exhibition is accompanied by a Preliminary Transport Assessment and the Study includes discussion of options for proposed traffic management.

The Department of Planning in response to resident concerns, extended the exhibition period to 28 February 2011 and also announced that Transport NSW will be preparing a Transport Management and Accessibility Plan (TMAP) for the area. This TMAP is intended to provide “a multi-modal assessment of future transport needs and identify a range of transport measures, including infrastructure requirements, needed to support the growth of the centre over the next 25 years.”

The process to prepare this TMAP commenced on 15 February 2011 to set up a governance structure. Council has been included in the working party to oversee its preparation. The Department of Planning has advised that it will take some time to complete and also that the Minister does not need to await its completion prior to making a decision on the rezoning (SEPP amendment) proposal.

In the absence of the TMAP, there is a lack of detail on the potential impact of the proposed specialised centre on the existing regional and local road system and potential extra demands on public transport. There is also a lack of detail on what improvements and upgrades will be required to cope with the extra traffic, commuters etc.

It is considered that the impact of the proposed specialised centre on traffic and transport is the critical issue which needs to be fully investigated and addressed before any land is rezoned to allow specialised centre development.

Therefore it is considered premature to rezone this land at Frenchs Forest for a specialised centre until there is a clear indication of the implications of projected development on the existing road system and traffic volumes. The Minister should therefore await completion of the TMAP prior to gazetting any amendment to the Major Development SEPP. If the SEPP amendment proceeds ahead of its completion, it should at least include provisions that the TMAP be prepared and approved before any precinct plans are approved or any individual developments approved.

In relation to public transport, Warringah Road is identified as a strategic bus corridor, however there needs to be consideration of how it will be able to manage extra commuter volumes. Also, any planning needs to factor in the possibility of other public transport systems being implemented in the future. (e.g. light rail). These issues will form part of the TMAP when completed.

- **The Process**

The State Significant Site Study and other investigations for the Frenchs Forest Specialised Centre were prepared with little consultation with Council.

Given that this is a major sub-regional strategic issue, which will impact upon Council's future strategic planning, asset provision and management, provision of services etc., then it is considered that there should have been more collaborative consultation with both Council and the community.

In addition, it is vital that the proposed specialised centre be planned in a co-ordinated manner and not by individual precincts, nor guided by the demand for individual development. Before any developments are approved it is considered that there should be a comprehensive Master Plan prepared for the proposed Frenchs Forest Specialised Centre, to be informed by the Transport Management and Accessibility Plan (TMAP). Should the SEPP amendment proceed, then it should include a requirement for these documents to be prepared and approved prior to any individual precinct planning. The current proposal allows precincts to be approved and developed separately.

The Master Plan will need to look at issues of local and regional traffic management, urban design guidelines, pedestrian and cycle connectivity as well as other issues of relevance across the proposed centre, including catchment issues, drainage issues, bushfire controls, landscaping,

wildlife corridors and threatened species, open space provision, water quality management, heritage protection etc.

- **Relationship to Housing Strategy**

To comply with the dwelling targets imposed upon Council by the 2005 Metro Strategy and 2007 Sub-Regional Plan, Council has prepared a draft Housing Strategy, which has yet to be adopted. This Housing Strategy was prepared with significant community involvement via the “Talk of the Town” consultation process.

It is considered inappropriate for the Department of Planning to rezone any residential land at Frenchs Forest as part of the rezoning of this specialised centre. Given the extensive, community engaged process undertaken by Council for the Housing Strategy, it is more appropriate that the location and nature of any residential rezoning remain with the Council. Any residential rezoning via the SEPP amendment will pre-empt Council’s Housing Strategy.

Therefore it is considered that all land proposed to be zoned R3 – Medium Density Residential, should be excluded from any rezoning for the Frenchs Forest State Significant Site, under the Major Development SEPP. Council is the appropriate authority to determine and plan the additional housing component needed to support the proposed specialised centre.

- **Impact on other centres/employment lands (Brookvale/Dee Why/Warringah Mall)**

Council is required to provide 12,500 extra jobs by 2031, with 4,000 of these designated to be provided in the identified Major Centre of Brookvale/Dee Why. This figure will increase when the sub-regional employment targets are revised to meet the new regional employment target set in the Metropolitan Plan for Sydney 2036.

Any proposals to intensify existing employment lands should await the finalisation of the North-East Sub-Regional Plan and the revised employment targets for Warringah being determined.

Frenchs Forest, with its business park/commercial area has always been part of Council’s existing and future employment lands. Draft WLEP 2009 recognises this by rezoning this land B7 – Business Park. Council also has previously supported the notion of Frenchs Forest developing as a specialised centre (health and technology), however this was based on the announcement by the NSW State Government that a new level 5 Northern Beaches Hospital would be built at Frenchs Forest.

Therefore, the construction of the proposed Northern Beaches Hospital is critical if Frenchs Forest is to develop beyond that of a business park area. The construction of a hospital should therefore be a pre-requisite for any rezoning of Frenchs Forest as a specialised centre. NSW Health has recently (15 February 2011) requested that the Minister for Planning declare the proposed Northern Beaches Hospital a Major Project under Part 3A of the Major Development SEPP. This action still does not constitute commitment by the NSW Government to the hospital proceeding.

Warringah Mall is the major regional retail centre, being part of the Brookvale/Dee Why Major Centre. It is located in close proximity to Frenchs Forest, therefore any centre developed at Frenchs Forest must be specialist in nature, i.e. based on health and allied industries.

It is considered critical that the construction of the hospital forms the catalyst for the new specialised centre. Without the hospital, there is the possibility that the Frenchs Forest centre, with its larger lot sizes and lower development costs, will attract major centre type developments and functions, taking them away from the existing Brookvale/Dee Why Major Centre.

- **Other Comments**

It is important to realise that proposed development of this specialised centre will occur over some 25 – 30 years. As mentioned, what is vitally important is that proper strategic planning is undertaken at this stage to ensure that it gets developed in a functional and co-ordinated manner instead of piece-meal development driven by development demands.

While a tunnel solution under the Warringah Road road alignment appears a good solution to manage the regional traffic volumes through the proposed new centre, it is unclear when or how this will occur or even if it will occur. In the absence of the tunnel under Warringah Road, there is limited opportunity for a link between the proposed commercial core and the hospital precinct.

While the proposed commercial core will provide a good service for surrounding workers in the employment lands, it is relatively remote from the hospital precinct. If Warringah Road can become an urban street, then access issues will be improved. If the Warringah Road/Wakehurst Parkway intersection is grade separated, access between the hospital and the proposed commercial core will be difficult. It is envisaged that there would be a greater connection between the hospital and the Mixed Use zone proposed for Bantry Bay Road.

It is also noted that there is no housing permissible in the proposed commercial core. While it is recognised that there is less focus on housing in a specialised centre, as opposed to a major centre, it is not understood why there cannot be some housing incorporated into the commercial core. This would serve a dual function of bringing more life and activity the centre outside business hours and would also relieve some of the pressure to increase dwelling numbers in the surrounding low density residential areas. Bringing life into the commercial core outside business hours will introduce a night economy to the area and increase safety and security for the centre and also the surrounding business area.

There has been concern about the future of Forest High School, given that it has been included in the Critical Infrastructure zone along with the hospital site. It is likely that this has been done to allow flexibility in the development of the hospital and related facilities, however it is Council's understanding that the High School will remain, but may be relocated or re-built on the western part of the existing site. There should be some undertaking given that the High School and its facilities will remain in its current form.

This proposed specialised centre is anticipated to accommodate in the order of 12,000 – 17,000 additional jobs (including 5,000 hospital jobs). The North-East subregion has a current target of 23,000 additional jobs by 2036, as set by the new Metropolitan Plan for Sydney 2036. It seems premature to proceed with the Frenchs Forest specialised centre rezoning prior to the review of the draft North-East Sub-regional Plan being completed and new targets being set for Warringah, for both employment and housing.

- **Other Divisional Comments**

A full copy of Divisional Comments can be seen at Attachment D. A summary is outlined below:-

Natural Environment

Flooding: Stormwater and overland flows should be considered in any detailed designs to minimise potential flooding impacts (including impact upon Manly Lagoon Catchment).

Catchment Management: Study overlooks several smaller watercourses in close proximity. These are likely to be affected by any increase in impervious surfaces and removal of vegetation, which can lead to a decrease in water quality, increase in weeds, erosion of creek banks and increase in sediment. Any development should meet specified criteria to minimise such impacts.

Biodiversity Management: The Study area contains extant patches of Duffys Forest Ecological Community (DFEC) which is listed as an endangered ecological community under the Threatened Species Conservation Act, 1995. The study area also contains two mapped wildlife corridors, a priority one corridor and a priority two corridor. These constraints should be considered in any detailed precinct planning for the area.

Economic Development

A new Specialised Centre requires commitment from the NSW Government to the new hospital. It also requires collaborative planning across all relevant NSW State agencies, including NSW Industry & Investment.

More work needs to be done on the future role, size, function etc. of Brookvale/Dee Why, in relation to the proposed Frenchs Forest Specialised Centre. Also, more work needs to be done on the links between a developing Frenchs Forest and Macquarie Park, including traffic and public transport links.

Consideration should be given to development of a University in Frenchs Forest, to attract and give support to small to medium businesses.

More details are required on transport infrastructure to support the centre, e.g. At what level of development is mass transit light rail required linking Frenchs Forest to Chatswood?. There are no details on the construction or staging of the proposed Warringah Road tunnel.

The occupation and education profiles of Warringah LGA and the regional context of the SHOROC are well matched for the future employment profile of the proposed specialised centre.

The overall proposal supports the core sustainable economic policy directions of the Metro Strategy and NSW State Plan to provide jobs closer to home and increase employment in strategic centres.

Traffic and Waste

Traffic Management: The proposal, as well as increasing self-containment of trips will also increase local traffic flow within the surrounding Council network, which will need to be modelled. Consideration needs to be given to local area traffic management measures to minimise traffic impacts on existing local roads.

The proposal should consider the provision of public transport and integration with the Transport Strategy. Proposals for fast public transport links outlined in SHOROC's Shaping Our Future document require consideration of the existing capacity of Roseville Bridge to carry increased public transport loads, including cyclists.

The NSW Bike Plan would need to be revised or updated so that cycleways are integrated with proposed road network and transport hubs. Also the Warringah Bike Plan should be incorporated and where appropriate modified to fit in with all traffic management scenarios.

There is a general need for more information on the impact of the proposed specialised centre on traffic management. A traffic transport model is required to test development scenarios and the required road network and intersection infrastructure. Also, a PAMP should be developed to achieve and encourage walking and provide connectivity and accessibility to surrounding areas.

There is no consideration of improvements to flood mitigation measures on Wakehurst Parkway.

Road Assets: Impact on local road network needs to be considered including issues such as traffic loading, structural capacity and pedestrian facility requirements. Traffic impacts during and after construction, need to be considered on the local road network.

Development Engineering: Proposed developments are to include the provision of on-site stormwater detention, in accordance with Council's On-Site Detention Policy document. Water reuse is encouraged. Stormwater flows from any staged developments are to be confined to "state of nature" conditions for all storm events up to 1 in 100 year ARI storm event.

Development impacting on Council's existing Stormwater Infrastructure will require upgrading and redesign in accordance with Council's Engineering Specifications and Policies.

Summary

A copy of Council's proposed submission to the Department of Planning can be seen at Attachment E. In summary, the following points are made:-

- Council supports the idea of a specialised centre for Frenchs Forest, predicated on it being in conjunction with construction of the proposed Northern Beaches hospital and also that it is properly investigated and planned before any development occurs;

- Construction of the proposed Northern Beaches hospital is critical and commitment to its construction should be a pre-requisite to any rezoning of Frenchs Forest as a Specialised Centre;
- It is considered that the critical issue with the planning of this proposed specialised centre is its impact upon regional and local traffic management and its impact upon the limited public transport services available. The TMAP, which is in its initial stages, should be completed and approved by all involved parties, prior to any rezoning of this land for specialised centre development. If this does not occur, then any SEPP amendment should require that the TMAP be completed in conjunction with an overall Master Plan and should be approved prior to any individual precinct Development Control Plan's (DCP's) or individual developments being approved;
- It is considered that in addition to the TMAP, an overall Master Plan for the proposed centre needs to be prepared (excluding residential land). Ideally this should be prepared before any amendment is made to the Major Development SEPP. If not, any SEPP amendment needs to provide for the preparation of this overall Master Plan and that this needs to be prepared and adopted before any individual precinct DCP's are approved and before any development is approved;
- Council should have control of all planning for residential development needed as a result of the specialised centre development. Therefore, all proposed land to be zoned R3 -Medium Density Residential, should be excluded from any amendment to the Major Development SEPP for the Frenchs Forest State Significant Site proposal;
- Council should be the authority to determine appropriate surrounding residential densities to support the specialised centre, as part of its detailed LGA wide Housing Strategy, which has been formulated with significant community involvement;
- Council is disappointed at the speed at which this proposal is being dealt with. It is considered that there should have been greater consultation with Council and the community. Also, the Transport Management and Accessibility Plan (TMAP), which has only recently been requested, should have been available at the time of exhibition;
- As a general comment, the level of detail available for the future development of the area, particularly in the area of traffic management, public transport and open space is considered an inadequate basis upon which to rezone the land for a specialised centre.

Timing

It is important to realise that the overall development of the Frenchs Forest Specialised Centre is a process that will occur over the next 25 – 30 years. Given this, the SEPP rezoning should not be rushed and proper Master Planning should occur to ensure that development is co-ordinated and not piece-meal.

The Department of Planning can proceed with rezoning of Frenchs Forest by way of an amendment to the Major Development SEPP, at any time after the exhibition of the State Significant Site Proposal has closed. After assessing submissions, a report is prepared to the Director General with a recommendation to proceed, or proceed with amendments.

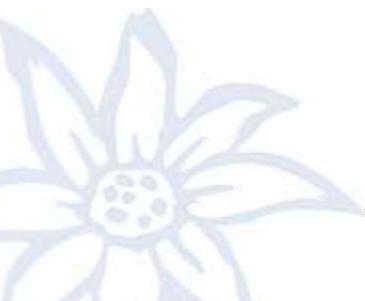
Given that a State election is to be held on March 2011, and that the exhibition time was extended until 28 February 2011, the Department of Planning has advised that it will not be possible for a decision to be made by the current government. However, once a recommendation is made to the Director General, the process does not allow for Council or the community to have any further input. Once the Minister approves the amendment, it will be gazetted and the land will then no longer be zoned under Warringah's Local Environmental Plan.

Policy Impact

If this proposal proceeds and Frenchs Forest is zoned as a specialised centre, there will be considerable impacts upon a wide range of Council policies.

Financial Impact

This proposal to designate Frenchs Forest as a specialised centre for the North-East Region will result initially in an increased demand for strategic planning work, followed by increased development assessment demands, along with demands for new assets, infrastructure and Council services. As such, there will be an on-going, and as yet undetermined, financial commitment needed from Council over many years. This will also be accompanied by an undetermined increase in Council's income rates base.

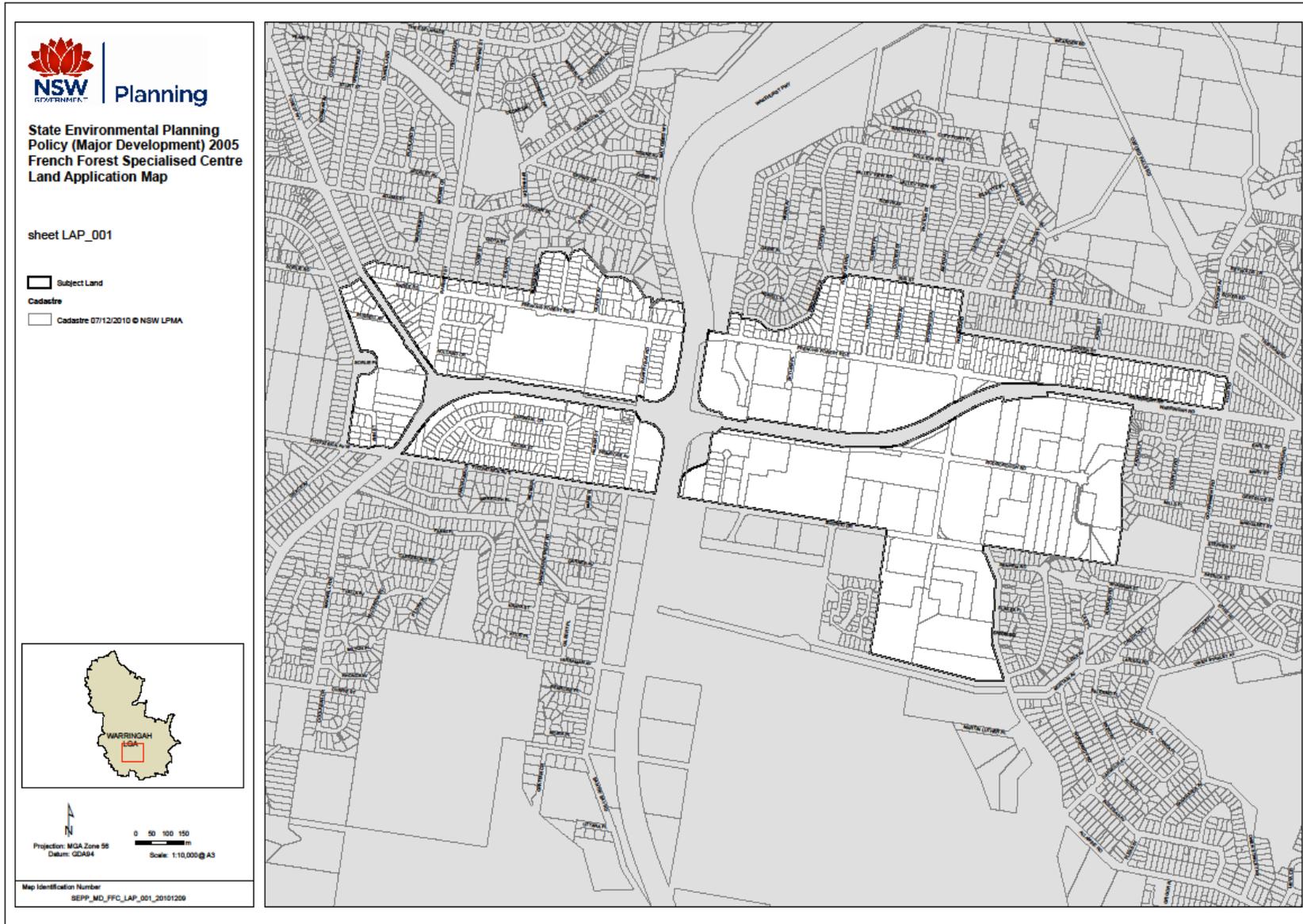
Manager Strategic Planning

Attachment Booklet
EXTRAORDINARY COUNCIL MEETING
1 MARCH 2011

ITEM 3.3
Frenchs Forest State Significant Site Proposal

Attachment Booklet

Land Subject to Proposal



Details of Proposal

Land to which amendment applies

Sheet LAP_001 is the Land Application Map which shows the extent of the land subject to the Frenchs Forest SSS. It stretches from Grace Avenue in the west to Ellis Road in the east and covers all the existing employment lands, the proposed hospital site, Forest High school and some surrounding residential areas. It also includes Special Use land south of Aquatic Drive. The Frenchs Forest SSS is serviced by the major arterial roads of Warringah Road, Wakehurst Parkway and Forest Way, however these roads have not been included in the land subject to the amendment and therefore will not be rezoned as part of this process. Therefore the declared State Significant Site does not include these major roads.

It is noted that the land shown on this Land Application Map is a reduced area than that which is the subject of the State Significant Site Study. There is also a Precinct Map (Sheet PRT_001) which divides the SSS into eight (8) precincts.

Proposed Zonings

The land within the SSS will be subject to various zonings – details of which are shown on the draft Land Zoning Map (sheet LZN_001). The zones proposed to be used are:-

R3 Medium Density Residential

B3 Commercial Core

B4 Mixed Use

B7 Business Park

SP1 Special Activities

SP2 Infrastructure

RE1 Public Recreation

The Explanation of Intended Effect also includes a table describing the objectives of each of these zones and lists the permissible and prohibited uses in each of the proposed zones. A summary of the objectives and uses permissible within the proposed zones are:-

R3 Medium Density Residential

The main objective of this zone is to provide for increased residential densities on land with ready access to commercial land. The intention is to provide a variety of housing types, however within a medium density residential environment. Everything in this zone requires consent, except home based child care and home occupations. Residential accommodation permissible with consent includes attached dwellings, bed and breakfast accommodation, boarding houses, dual occupancies, dwellings houses, exhibition homes, group homes, multi-dwelling housing, residential flat buildings and seniors housing. Neighbourhood shops are also permitted.

This R3 zone is proposed for all residential land within the SSS area.

B3 Commercial Core

The main objective of this zone is to create a commercial centre with retail, business, office, entertainment, community and other suitable land uses to serve the needs of the local and wider community.



Details of Proposal

There is one B3 zone proposed in the centre of the current employment lands, immediately west of Allambie Road and straddling Warringah Road. It is noted that the only other centre in Warringah which has this B3 zone in Council's draft template LEP is Warringah Mall.

B4 Mixed Use

The main objective of the B4 Mixed Use zone is to provide a mixture of compatible land uses and to integrate business, office, residential, retail and other development in accessible locations to maximise public transport patronage and encourage walking and cycling. The uses permitted include retail, business, entertainment, education, office, clubs, residential flat buildings, seniors housing and shop-top housing.

There are three (3) B4 Mixed Use zones proposed which encompass the existing shopping centres of Skyline, Bantry Bay Rd and Forestway. In all three cases, the proposed B4 zone is significantly larger than the current extent of commercially zoned land, rezoning a significant amount of surrounding residential land.

B7 Business Park

The main objective of this zone is to encourage employment opportunities for a range of office and light industrial uses, along with the provision of other facilities and services to meet the day to day needs of workers in the area.

This B7 zone is proposed over most of the existing employment lands at Frenchs Forest (with the exception of the land in the middle which is proposed as B3 Commercial Core).

SP1 Special Activities

The main objective of this zone is to provide for special uses not provided by other zones. The only uses permissible in this zone are those purposes shown on the Land Zoning Map.

There is only one SP1 zone proposed which is on the land south of Aquatic Drive which includes the existing Spastic Centre land. It is at the southern most extent of the SSS area. The uses nominated on the Land Zoning Map are "*Health Service Facility, Senior Housing Community Facility and Education Establishment*".

SP2 Infrastructure

The main objective of this zone is to provide for infrastructure and related uses and prevent any development which would be incompatible with the future provision of this infrastructure. Uses permissible are those shown on the Land Zoning Map.

This SP2 zone is proposed to be applied to the Frenchs Forest High School and the adjacent proposed hospital site. Nominated uses are "*Health Service Facility and Educational Establishment*".

RE1 Public Recreation

The main objective of this zone is to enable land to be used for public open space. Permissible uses are limited to those listed, but include all types of recreational facilities (with consent) as well as restaurants, community facilities and child care centres.

The RE1 zone has been applied to various existing open space areas within the study area, however not all open space strips on Warringah Road have been included.



Details of Proposal

Proposed Development Standards

There are two (2) principal development standards proposed, being height of buildings and floor space ratio. These controls are also shown on the Draft SEPP maps. (Sheets HOB_001 and FSR_001). It is noted that the maps with this amendment are indicative only showing a range for each standard. More detailed planning via Precinct DCP's will occur at a later date.

The *Height of Buildings Map* (Sheet HOB_001) has 4 different height categories.

12 – 13 metres - applies mostly to proposed Residential land R3 and to the proposed Mixed Use B4 zone at Skyline and part of the proposed B4 zone at Bantry Bay Road

15 – 17 metres - applies mostly to Mixed Use zones (except Skyline and part of Bantry Bay Rd) and the Residential R3 zone adjacent to the Mixed Use zone at Forestway

25 – 30 metres - applies only to the Business Park B7 zone

35 – 40 metres - applies only to the Commercial Core B3 zone

As the height of building control is not zone specific, the summary in the Explanation of Intended Effect lists the proposed heights per zone as:-

Zone R3 – 12m to 17 m

Zone B3 – 25m to 40 m

Zone B4 – 12 m to 17 m

Zone B7 – 25m to 30m

What this summary does not indicate is that the majority of the R3 residential zone will be subject to a 12m to 13m height limit, with residential heights of up to 17 m only proposed at Forestway. There is no height limit proposed for the Special Use zones (including the hospital site).

The other main development standard is Floor Space Ratio. This is also shown on a map (Sheet FSR_001). The *Floor Space Ratio Map* only includes two maximum FSR's over the SSS area:-

Max FSR of 1.5:1 – 2.0:1 – This is applied to all proposed residential zones as well as the mixed use zone at Forest Way and Skyline as well as part of the mixed use zone at Bantry Bay Rd.

Max FSR of 2.0:1 – 2.5:1 – This is applied to the entirety of the proposed B3 Commercial Core zone and the B7 Business Park zone.

It is noted that there are no FSR's set for the Special Use zones (including the hospital site).

Proposed miscellaneous provisions

The SEPP amendment will also impose additional controls on development (e.g. heritage conservation) and establish other administrative arrangements. There is no detail provided on these additional controls.

Also, it is stated that there will be controls for specific types of development, including:-

Bed & breakfast accommodation – no more than 3 bedrooms;

Home business and home industry – max 50sqm floor area;

Kiosk – max 50 sqm gross floor area;



Details of Proposal

Neighbourhood shop – max 80 sqm retail floor area;

Road side stall – max 20 sqm gross floor area.

Proposed requirement for preparation of DCP

The SSS area is divided into 8 separate precincts, as identified on the *Precinct Map* (Sheet PRT_001).

The amendment to the SEPP (Major Development) provides that consent cannot be granted to development within a precinct unless a DCP has been prepared. Under these provisions, a DCP must be prepared by at least 60% of land owners in the precinct before being submitted to the Director General. The Director General (as the relevant planning authority) can make the DCP as submitted, or make changes, under the provisions of Section 74D (4) of the EP&A Act, 1979.

This provision will specify the matters to be provided for in the required DCP, including integration with the planning of other precincts and matters such as urban design controls, traffic management and car parking, pedestrian and cycle routes, landscaping and enhancement of remnant vegetation, stormwater and water quality management, bushfire protection and site contamination. There are no details provided as to these proposed requirements.

Critical Infrastructure Project

The proposed amendment to Schedule 5 identifies the proposed hospital and ancillary and related development as a critical infrastructure project and includes the Forest High School site.

Comparison with Draft WLEP 2009

- B7 Business Park zone is essentially the same area, with the exception of the area in the centre of this zone which is proposed as B7 Commercial Core.
- All proposed R3 Medium Density Residential zones are zoned R2 Low Density Residential in draft WLEP 2009.
- Zoning of strips of RE1 Public Recreation land, owned by Council along Warringah Road, has not been continued into the SSS proposed zonings.
- For Skyline and Bantry Bay Rd shops the draft WLEP 2009 zones current development as B1 Neighbourhood Centre, whereas the SSS proposal has a much bigger area zoned B4 Mixed Use at these sites.
- There is also a much bigger commercial zone proposed at Forestway. Draft WLEP 2009 zones half the area B2 Local Centre and half R2 Low Density Residential, whereas the SSS proposal is for all the land to be B4 – Mixed Use.
- Draft WLEP 2009 zones Forest High and the proposed hospital site R2 Low Density Residential, in accordance with Departmental policy. The SSS proposal is for these sites to both be zoned SP2 Infrastructure.
- The SSS zonings do not include the zoning of Warringah Road, Wakehurst Parkway and Forest Way. Draft WLEP 2009 proposes to zone these roads SP2 Infrastructure



Council Submission on Sydney Towards 2036 – Metropolitan Strategy Review - Council meeting - 27 April 2010.

Extract pertaining to Frenchs Forest

The Frenchs Forest employment area is not considered to be an appropriate location for a Major Centre because:-

- 1. A major centre is intended to be the major shopping and business centre for the district. As such, it does not follow that a second major centre should be provided less than 4km away.*
- 2. The draft NE subregional strategy indicates that a major centre has a radius of approximately 1km and supports a typical dwelling range of between 9,000 and 28,000. At present there are 4,529 rateable dwellings in the suburb of Frenchs Forest (which is considerably larger than both the proposed investigation area and the area within a 1km radius of the investigation area). The number of dwellings within the investigation area would therefore be well short of the number of dwellings expected in a major centre.*
- 3. A Housing Strategy is currently being prepared to detail how Warringah will meet the NE Strategy housing target for Warringah of 10,300 new dwellings by 2031. The western portion of the proposed investigation area has been identified as a potential location for additional dwellings. The appropriateness of this location for additional housing will not however be determined until after community consultation has been undertaken and further investigations are carried out.*
- 4. Due to the existing constraints and difficulties involved in developing within Brookvale and Dee Why and the relative ease of developing in Frenchs Forest, the identification of a new major centre within the subregion, which is within close proximity to the already existing major centre, is likely to compromise the pace and extent of future development within the Brookvale-Dee Why major centre. The identification of a major centre at Frenchs Forest is likely to impact on the realisation of the full potential of the Brookvale-Dee Why major centre.*

The studies presented to Council to date focus on the potential of Frenchs Forest as an employment centre, particularly a specialised employment centre. The 'SHOROC Regional Employment Lands Study' dated March 2008 prepared by Hill PDA on behalf of SHOROC indicated that Frenchs Forest could be the location of a specialised centre for health and technology due to the nomination of Frenchs Forest as the site for a new hospital.

If the planned northern beaches hospital proceeds the proposed development of Frenchs Forest would result in a centre that is similar to the specialised centre of St Leonards, which supports the Royal North Shore hospital and other related specialist health services in addition to a number of high density residential developments.

The features of the Frenchs Forest employment area are more closely aligned with that of a specialised centre than a major centre. As such, to ensure consistency in the use of the centre hierarchy established in the Metro Strategy it would be more appropriate to investigate the development of the precinct as a specialised centre.

The classification of the centre as either a major centre or a specialist centre will have significant implications for the future planning of the centre. As such, prior to further investigations being undertaken the most appropriate centre classification should be determined.



Divisional Comments

Natural Environment Comments

Flood

No flood data exists for the area at the present time. Given the subject area is located at the top of the catchment, it is unlikely that significant flooding in the area will occur, however Department of Planning should consider stormwater and overland flows in its detailed designs and forward plans to minimise any potential flooding impacts.

Warringah Council, in partnership with Manly Council and DECCW is currently undertaking a Flood Study for the Manly Lagoon catchment. This Flood Study includes an investigation of overland flows across the catchment, in which areas of the Frenchs Forest Master Plan exist. Should the Flood Study identify areas of significant overland flows, it may be necessary to implement development controls to prevent damage to the subject and adjoining properties during a flood event.

Catchment Management

The DoP's document "Frenchs Forest Specialised Centre State Significant Site Study" recognises the major watercourses that will be affected by the proposed redevelopment, however has overlooked several smaller watercourses which exist within close proximity to the subject redevelopment. Please see attached map for further information (refer Appendix A).

Watercourses within the precincts and those down stream such as Bantry Bay (Middle Harbour), Manly Dam, Curl Curl Creek (Manly Lagoon) and Middle Creek (Narrabeen Lagoon) are likely to be affected by the increase in impervious surfaces and the removal vegetation, resulting in a decrease in water quality, increase of weeds, erosion of creek banks and increase in sediment. We appreciate that the DoP recognises that "these sensitive ecological areas will require that storm water detention and water management within the Frenchs Forest Specialised Centre is of the highest order".

While we further appreciate that the DoP note that "the development controls for the study area will need to ensure that no stormwater runoff leaves a site without being properly treated first, suitable for discharge in to the sensitive ecological areas associated with Narrabeen Lagoon, Garigal National Park and Manly Dam", in order to establish appropriate objectives, Warringah Council encourages the DoP to establish a stormwater monitoring program to determine pre and post development levels. This will help determine what stormwater treatment levels and devices are required, in addition to aid in the assessment of the effectiveness of the stormwater treatment devices employed to ensure the desired water quality outcomes are being achieved. A useful resource in this regard is the Northern Beaches Stormwater Management Plan available from <http://www.warringah.nsw.gov.au/environment/documents/NorthernBeachesStormwater.pdf>

In addition to the above, it is strongly recommended that the development meets the following criteria, as a minimum:-

- Best practice Water Sensitive Design objectives must be adopted at all stages of the development;
- No development, including asset protection zones, is to encroach into riparian lands (riparian zone or buffer zone). Where development has encroached into the riparian lands in the past, these areas are to be reinstated into its natural form to enable function as a sustainable ecosystem;



Divisional Comments

- All watercourses and riparian land within and surrounding the proposed precinct must be protected and remain in a natural and unmodified state in perpetuity;
- No exotic plants or weed species are to be planted within the proposed precincts.

Biodiversity Management

The study area contains extant patches of Duffys Forest Ecological Community (DFEC), listed as an endangered ecological community under the *Threatened Species Conservation Act 1995*. DFEC is highly restricted in its distribution and extent, such that the extant DFEC in the study area is the most significant portion of DFEC in the southern portion of its range, i.e. only small, isolated fragments of DFEC occur further south than the DFEC that occurs in the study area. None of the reports submitted to Council for comment, including the constraints and opportunities documents refer to this.

Many of the proposed precincts, contain large areas of mapped DFEC, including the western side of the Forestway precinct, the eastern ends of the Forest High and Karingal precincts, the western side of the business precinct, the northern side of the core precinct, the middle of the Sunnyfield precinct and part of the Rodborough precinct. A map of the extant DFEC in the study area is attached (refer Appendix B). There appears to be no consideration of this in the design or layout of the precincts. Approximately 87,097m² of DFEC occurs within those precincts on lots identified as opportunity sites.

The study area contains two mapped wildlife corridors. A priority one corridor stretching north-south and a priority two corridor linking vegetation in the eastern part of the study area with Allenby Park (Smith and Smith 2005). Whilst the maintenance of the north-south corridor is considered in the report, the removal of large areas of vegetation with the business precincts and the Forest High and Karingal precincts is not consistent with this vision. It is noted that the current precinct layout will reduce the north-south corridor width from approximately 502m to 70m. The priority 2 corridor to the east of the site is not considered. Furthermore, consideration of the impact on, or maintenance of corridor values should include analysis of visual and noise pollution from lights and increased traffic and associated hazards for fauna.

- The sites are known and potential habitat for *Ninox strenua*, *Tetratheca glandulosa*, *Pimelea curviflora* var. *curviflora* and Red-crowned Toadlet.
- The proposed zoning allocated to open space areas of DFEC allows for uses that are not consistent with the conservation of DFEC in those locations.

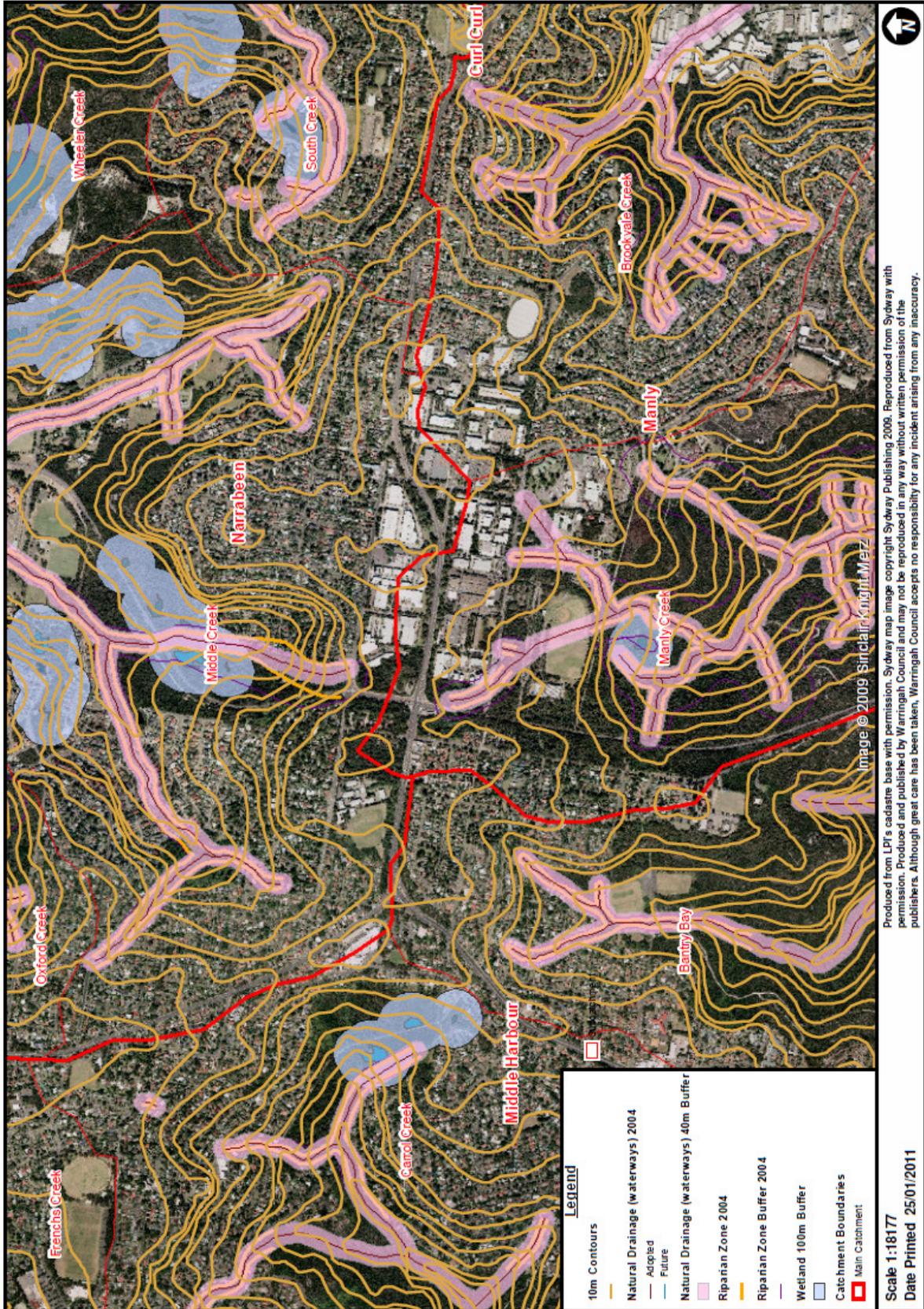
RECOMMENDATIONS

- A. The analysis of the constraints and opportunities should be amended to consider threatened biodiversity habitat, in particular, Duffys Forest Ecological Community. The analysis should include DFEC as a significant constraint.
- B. The layout of the precincts should be guided by the location of extant patches of DFEC.
- C. Suitable offsets for the loss of DFEC should be provided.



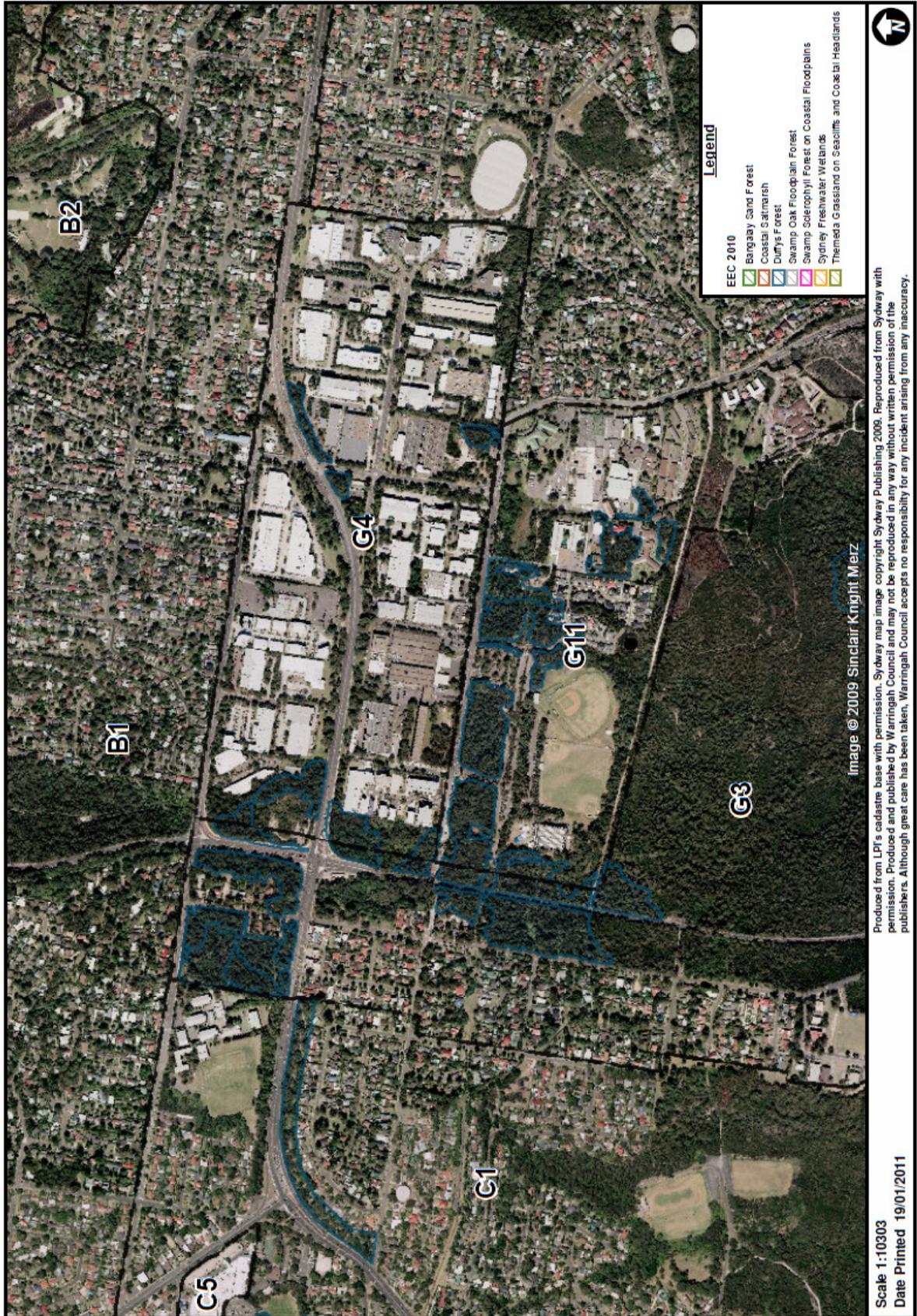
Divisional Comments

Appendix A – Waterway and Riparian Lands



Divisional Comments

Appendix B - Extant DFEC in the Study Area



Divisional Comments

Economic development comments

- It is essential that any long term, sustainable economic development consideration of Frenchs Forest as a 'Specialised Centre', in the context of Warringah LGA, the SHOROC and NE Region requires commitment by NSW Government to the new Frenchs Forest hospital infrastructure. At the same time it is also essential that all associated major infrastructure such as, public transport (strategic bus corridors) and housing provision be recognised as supporting the hospital, through a co-ordinated intergovernmental approach to all planning and development stages.

A timetable for the staging of the hospital and all associated infrastructure is not provided in the study, but would be vital information for any in- depth assessment of the economic development impact of the proposal.

- Consideration of a new Specialised Centre requires collaborative planning across all relevant NSW State agencies. The process outlined in the study refers to input from eight NSW State agencies, as well as Warringah Council, but there is no reference to any advice or consultation with NSW Industry & Investment - the State's key business-related department. A new hospital inevitably requires and attracts the clustering of support businesses, such as medical devices, research facilities etc. and requires many skilled employees from specialist professions.

The input and involvement of NSW Industry & Investment representatives could usefully assist in the following ways:

- comment on the economic development impact of the FF Specialist Centre for the NE Region of Sydney;
- to identify the future estimated job numbers;
- skills gaps;
- inward investment opportunities potential locally relating to the hospital, retail and commercial development scale;
- synergies and relationship to relevant medical –related businesses in the NE Corridor and economy nationally, as well as other economic development benefits / impacts, strengths etc in this important business sector for Sydney and NSW;
- comment on the future role of Mona Vale and its 'town centre' status as the designated second level centre on the Northern Beaches.
- More comparative details on the future role, size, function etc of Brookvale – Dee Why as the Northern Beaches major civic and cultural Centre, in relation to the Frenchs Forest Specialised Centre would be useful to help clarify essential service infrastructure needs of the expected 20,000-25,000 employees at this location and the relationship to the Metropolitan Strategy targets for employment numbers Warringah.

Demand for premium, green-star rated, new commercial and more affordable office areas with smaller spaces, could over time extend to areas such as the subject Frenchs Forest site. More affordable compared to the CBD and North Sydney, Frenchs Forest has the potential to become an attractive location for small to medium high tech / green oriented companies, due to the proximity of the CBD and advantage to employers due to a highly skilled local workforce.

- The relationship of a developing Frenchs Forest commercial precinct, geographically close to Macquarie Park and its international companies and regional headquarters, is



Divisional Comments

closely linked to Sydney's success as 'Australia's Global City' status. This connectivity is considered to be important for future economic development and jobs growth in Frenchs Forest.

Easier private and extra public transport access to overcome current traffic delays and excessive travel times between the two areas should occur by widening the existing east – west transport link involving Mona Vale Road and Forest Way for rapid bus access. Improved traffic management could also include the provision of longer clearway conditions on Mona Vale Road, between Forest Way through St Ives to North Ryde.

- New business locating to Macquarie Park will continue to generate an increasingly wide variety of blue and white collar job opportunities (managers & professionals) that coincide with the demographics of the Northern Beaches population. Also, the job growth associated with Macquarie University's commercial office growth involving companies such as Cochlear and the recent private hospital will provide ongoing job opportunities which also match the needs of Northern Beaches employees in sectors such as; IT&T, multi media, professional and other medical services. These business sectors will continue to have business to business connections with similar new small to medium companies locating in Frenchs Forest.
- Should the Frenchs Forest Specialised Centre follow an evolution like Macquarie Park, the presence of a University in Frenchs Forest could help to grow jobs between the tertiary education provider and act as a supply of specialist business skills / needs. It is considered that existing profile local companies such as, Ricoh, Gordon & Gotch and Dell Computers, for example, would benefit greatly from a University presence as part of future development A university presence would also help to attract and give support to small and medium businesses wanting to locate in the LGA.
- There is no specific reference to NSW Government's role in the marketing and branding of Frenchs Forest Specialised Centre. The status of a potential Specialised centre is most likely to reinvigorate existing business, attract new jobs investment through targeted marketing and branding as has been achieved at, for example, Norwest Business Park in the Hills Shire. Marketing the Frenchs Forest area, once the essential infrastructure has been agreed and in place should involve Councils', business stakeholders and government to showcase the region for its outstanding environmental attributes, economic capabilities, competitive and comparable advantages and opportunities.
- The Civic Plaza area of the subject proposal, commercial core and business park areas are the main areas to generate pedestrian activities to capitalise on the active street frontages, new retail shops and services. An uncongested public domain with high quality finishes for footpaths, public art opportunities and street furniture are some of the key public domain attributes to help the centre's future business growth, attractiveness to customers and successful marketing & branding.
- The role of Mona Vale as the region's only Town Centre will have a different status in the Metro Strategy hierarchy as a result of the new specialist precinct at Frenchs Forest, particularly with regard to the amount of commercial floor space required to 2036 for Pittwater. Also there will be increased traffic impacts for Wakehurst Parkway as a result of Pittwater generated traffic accessing Frenchs Forest and other centres such as Chatswood, Nth Sydney and the CBD. Wakehurst Parkway through Oxford Falls should be widened with dedicated bus priority lanes to alleviate potential congestion.



Divisional Comments

- At what level of development is mass transit light rail required linking Frenchs Forest to Chatswood?.
- There is no discussion of the length of the construction phase, or staging of the Warringah Road tunnel, which will have significant impact on existing traffic movements for workers, as well as disruption for existing residents in and around the study area. The tunnel is only discussed at the beginning of Stage 3 in the concept plan when all development is complete.

The wide nature strip and deep setback of existing commercial development on Warringah Road is potentially useful space, as part of a construction zone for storage etc during the stage 3 tunnel building and road reconfiguration.

- The occupation and education profiles of Warringah LGA and the regional context of the SHOROC Councils are especially well matched for the future employment profile of a 'specialist centre'. For example, Health and Community Services employment is the third highest employing business sector for SHOROC Councils and accounted for more than 6,500 people in the Warringah LGA (2006). Between 2001 and 2006 this same job category increased by almost 1,000 persons.

In general the profile of Warringah and the region can be described as, highly skilled with higher proportions of managers, professional, clerical and administrative workers compared to other parts of Sydney. The overall levels of education of the local and regional population are well suited to the future employment specialisation. A decline in unskilled workers would be expected to result in increased demand for commercial floorspace and reduced demand for industrial space.

- The overall proposal supports the core sustainable economic development policy directions of the Metro Strategy and NSW State Plan to provide jobs closer to home and increase employment in strategic centres. The Warringah LGA and SHOROC Councils, in general, have experienced high levels of containment, ie. living and working in the area and the proposal will support this pattern.

The wider benefits of containment include a reduction in vehicle movements, into and out of area, less pressure on the road network and public transport. Business logistics benefit by a decrease in travel times for trades and other services such as deliveries.

Traffic Management Comments

Reference is made to the sections of the Preliminary Transport Assessment prepared by Arup with the following comments:

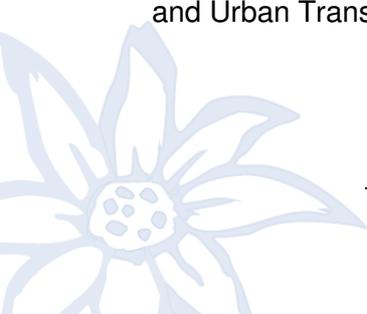
Page 7, 2.3.1

The report states that ...' *The reasons that Frenchs Forest is under consideration as a specialised centre because such a centre would increase the self-containment of trips in the subregion.*' This is correct for a subregion which is predominantly car based.

The proposal will contain trips within the area but however will also increase local traffic flow within the surrounding Council road network which will need to be modelled.

Page 9, 2.3.3

These documents relating to the Metropolitan Transport Plan – Connecting the City of Cities (2010) and Urban Transport Statement (2006) do not seem to 'meld' in respect to transport strategy.



Divisional Comments

The proposal should consider the provision of public transport and the integration with transport strategy.

Page 10, 2.3.5

It should be noted that Bus is the only form of public transport in Frenchs Forest area and Bus transport is 10% of trips. This is much lower for East/West Corridor which has poor connection between other major centres – Brookvale/Frenchs Forest/Chatswood.

Page 12, 2.3.6

The Shaping Our Future document lists ...'Fast public links to Chatswood, Ryde and the CBD with an initial focus on priority median-strip bus corridors using a Bus Rapid Transit System which is adaptable to light rail or other greater capacity transport in future years as needed'.

These proposals require consideration of the existing capacity of Roseville Bridge to carry increased public transport loads including cyclists.

Page 12, 2.3.7

The NSW Bike Plan would need to be revised or updated as there are currently no high priority measures near the study area. As such cycleways are to be integrated with the proposed road network and transport hubs.

Page 13, 3

The Trip Generation Forecasts may require considerations at:

- Forest Way
- Bantry Bay
- Frenchs Forest Road East

Page 16, 4.1

'These land use planning objectives must be supported by a range of policy measures including car parking policies, travel demand management initiatives and workplace travel plans.'

This plan also requires public transport improvements. (See above comments Page10, 2.3.5)

Page 17, 4.2

The aim of the transport hierarchy illustration in figure 11 to minimise car travel but it is questionable if it would be practical and achievable. A PAMP should be developed to achieve and encourage walking and provide connectivity and accessibility to surrounding areas.

Page 17, 4.3

The proposed two strategic bus corridors along Warringah Road in each direction is not immediately feasible in Forestville and Beacon Hill. It is stated that *'The need for a major interchange should be included in the structure plan to complement existing bus stops within Frenchs Forest'*.

A location for this proposal should be identified and include provision of adequate commuter parking.

Page 19, 4.4

- It will be required to develop a traffic transport model to test the development scenarios and the required road network and intersection infrastructure. This should include consideration of new road links/ intersections and particularly the Warringah Road and Allambie Road,



Divisional Comments

Warringah Road and Allambie Road and Rodborough Road intersections which should be included for investigation.

- Consideration needs to be given to local area traffic management measures to minimise traffic impacts on existing local roads, particularly where new intersections are proposed that connect directly with the local roads.
- The Ring Road option needs to consider poor alignment/small curve intersection at Frenchs Forest Road East/Allambie Road and the sharp crest on Aquatic Drive near Madison Way.

Wakehurst Parkway is nominated for future growth from Pittwater Road however there is no consideration to improve flood mitigation measures with the additional capacity.

'Another option would be to divert arterial traffic via a one-way or two-way 'ring road' around the town centre. This would have advantages of constructability while, maintaining traffic on Warringah Road, but would tend to sever the centre from its surrounding suburbs'. This would make the town centre into an 'island'.

Page 20, 4.5

The Warringah Bike Plan should be incorporated and where appropriate modified to 'fit' in with all traffic management scenarios.

Road Assets Comments

The impact of this proposal on local road network needs to be considered including issues such as traffic loading, structural capacity and pedestrian facility requirements.

Additionally traffic impacts during construction and after construction need to be considered on the local road network.

Shared footpaths are to be a minimum width of 2.5 m and footpaths a minimum width for primary routes of 2.0 m.

Development Engineering Comments

Stormwater drainage discharge from any proposed developments are to include the provision of On Site Stormwater Detention in accordance with Council's On Site Detention Policy Document.

In this regard stormwater flows from any of the staged developments are to be confined to "state of nature" conditions for all storm events up to the 1 in 100 year ARI storm event.

Water reuse in addition to On Site Stormwater Detention is encouraged.

Development impacting on Council's existing Stormwater Infrastructure will require upgrading and redesign in accordance with Council's Engineering Specifications and Policies



Submission to Department of Planning

Council Submission

Frenchs Forest, State Significant Site Study Exhibition

(February 2011)

Introduction

By letter dated 16 December 2011, the Department of Planning advised Council of the exhibition of the Frenchs Forest, State significant Site Study Exhibition. Exhibition of the proposal was initially due to close on 7 February 2011, however was extended until 28 February 2011.

Council considered the matter at its meeting held on 22 February 2011 and resolved that:-

(INSERT COUNCIL RESOLUTION).

In accordance with this decision, Council now makes this submission in response to the State Significant Site Study exhibition.

Discussion of Issues

Council, and the SHOROC region generally, have been supportive of a new hospital being built at Frenchs Forest. It has also been acknowledged that upon construction the hospital, then the surrounding employment lands of Frenchs Forest would be ideal for intensification as a health/technology related specialist centre.

However, there are a number of issues and concerns with the current Department of Planning State Significant Site Proposal.

- **Transport and Traffic Management**

There is a clear and stated lack of transport and traffic analysis accompanying this State Significant Site proposal. The exhibition is accompanied by a Preliminary Transport Assessment and the Study includes discussion of options for proposed traffic management.

The Department of Planning in response to resident concerns, extended the exhibition period to 28 February 2011 and also announced that Transport NSW will be preparing a Transport Management and Accessibility Plan (TMAP) for the area. This TMAP is intended to provide “a multi-modal assessment of future transport needs and identify a range of transport measures, including infrastructure requirements, needed to support the growth of the centre over the next 25 years.”

The process to prepare this TMAP has started and Council has been included in a working party to oversee its preparation. The Department of Planning has advised that it will take some time to complete and also that the Minister does not need to await its completion prior to making a decision on the rezoning (SEPP amendment) proposal.

In the absence of the TMAP, there is a lack of detail on the potential impact of the proposed specialist centre on the existing regional and local road system and potential extra demands on public transport. There is also a lack of detail on what improvements and upgrades will be required to cope with the extra traffic, commuters etc.

Submission to Department of Planning

It is considered that the impact of the proposed specialist centre on traffic and transport is the critical issue which needs to be fully investigated and addressed before the land is rezoned to allow specialist centre development.

Therefore it is considered premature to rezone this land at Frenchs Forest for a specialised centre until there is a clear indication of the implications of projected development on the existing road system and traffic volumes. The Minister should therefore await completion of the TMAP prior to gazetting any amendment to the Major Development SEPP. If the SEPP amendment proceeds ahead of its completion, it should at least include provisions that the TMAP be prepared and approved before any precinct plans are approved or any individual developments approved.

In relation to public transport, Warringah Road is identified as a strategic bus corridor, however there needs to be consideration of how it will be able to manage extra commuter volumes. Also, any planning needs to factor in the possibility of other public transport systems being implemented in the future. (e.g. light rail). These issues will form part of the TMAP when completed.

- **The Process**

The State Significant Site Study and other investigations for the Frenchs Forest Specialised centre were prepared with little consultation with Council.

Given that this is a major sub-regional strategic issue, which will impact upon Council's future strategic planning, asset provision and management, provision of services etc., then it is considered that there should have been more collaborative consultation with both Council and the community.

In addition, it is vital that the proposed specialised centre be planned in a co-ordinated manner and not by individual precincts, nor guided by the demand for individual development. Before any developments are approved it is considered that there should be a comprehensive Master Plan prepared for the proposed Frenchs Forest Specialised Centre, to be informed by the Transport Management and Accessibility Plan (TMAP). Should the SEPP amendment proceed, then it should include a requirement for these documents to be prepared and approved prior to any individual precinct planning. The current proposal allows precincts to be approved and developed separately.

The Master Plan will need to look at issues of local and regional traffic management, urban design guidelines, pedestrian and cycle connectivity as well as other issues of relevance across the proposed centre, including catchment issues, drainage issues, bushfire controls, landscaping, wildlife corridors and threatened species, open space provision, water quality management, heritage protection etc.

- **Relationship to Housing Strategy**

To comply with the dwelling targets imposed upon Council by the 2005 Metro Strategy and 2007 Sub-Regional Plan, Council has prepared a draft Housing Strategy, which has yet to be adopted. This Housing Strategy was prepared with significant community involvement via the "Talk of the Town" consultation process. It is considered inappropriate for the Department of Planning to rezone any residential land at Frenchs Forest as part of the rezoning of this Specialised Centre. Given the extensive, community engaged process undertaken by Council for the Housing Strategy, it is more appropriate that the location and nature of any residential rezoning remain with the Council. Any residential rezoning via the SEPP amendment will pre-empt Council's Housing Strategy.



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Therefore it is considered that all land proposed to be zoned R3 – Medium Density Residential, should be excluded from any rezoning for the Frenchs Forest State Significant Site, under the Major Development SEPP.

Council is the appropriate authority to determine and plan the additional housing component needed to support the specialised centre.

- **Impact on other centres/employment lands (Brookvale/Dee Why/Warringah Mall)**

Council is required to provide 12,500 extra jobs by 2031, with 4,000 of these designated to be provided in the identified Major Centre of Brookvale/Dee Why. This figure will increase when the sub-regional employment targets are revised to meet the new regional employment target set in the Metropolitan Plan for Sydney 2036. Any proposals to increase employment lands should await the finalisation of the North-East Sub-Regional Plan and the revised employment targets for Warringah being determined.

Frenchs Forest, with its business park/commercial area has always been part of Council's future employment lands. Draft WLEP 2009 recognises this by rezoning this land B7 – Business Park. Council also has previously supported the notion of Frenchs Forest developing as a specialised centre (health and technology), however this was based on the announcement by the NSW State Government that a new level 5 Northern Beaches Hospital would be built at Frenchs Forest.

Therefore, the construction of the proposed Northern Beaches Hospital is critical if Frenchs Forest is to develop beyond that of a business park area. The construction of a hospital should therefore be a pre-requisite for any rezoning of Frenchs Forest as a specialised centre. NSW Health has requested that the Minister for Planning declare the Northern Beaches hospital a Major Project under Part 3A of the Major Development SEPP. This still does not constitute commitment by the NSW Government to the hospital proceeding.

Warringah Mall is the major regional retail centre, being part of the Brookvale/Dee Why Major Centre. It is located in close proximity to Frenchs Forest, therefore any centre developed at Frenchs Forest must be specialist in nature, i.e. based on health and allied industries. Therefore it is critical that the construction of the hospital forms the catalyst for the new specialised centre. Without the hospital, there is the possibility that the Frenchs Forest centre will attract major centre type developments and functions, taking them away from the existing Brookvale/Dee Why Major Centre.

- **Other Comments**

It is important to realise that proposed development of this specialised centre will occur over some 25 – 30 years. As mentioned, what is vitally important is that proper strategic planning is undertaken at this stage to ensure that it gets developed in a functional and co-ordinated manner instead of piece-meal development driven by development demands.

While a tunnel solution under the Warringah Road road alignment appears a good solution to manage the regional traffic volumes through the proposed new centre, it is unclear when or how this will occur or even if it will occur. In the absence of the tunnel under Warringah Road, there is no opportunity for a link between the proposed centre and the hospital precinct.

While the proposed commercial core will provide a good service for surrounding workers in the employment lands, it is relatively remote from the hospital precinct. If Warringah Road can become an urban street, then access issues will be improved. If the Warringah Road/Wakehurst Parkway intersection is grade separated, access between the hospital and the proposed commercial core will be difficult. It is envisaged that there would be a greater connection between the hospital and the Mixed Use zone proposed for Bantry Bay Road.

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It is also noted that there is no housing permissible in the proposed commercial core. While it is recognised that there is less focus on housing in a specialised centre, as opposed to a major centre, it is not understood why there cannot be some housing incorporated into the commercial core. This would serve a dual function of bringing more life and activity the centre outside business hours and would also relieve some of the pressure to increase dwelling numbers in the surrounding low density residential areas.

There has been concern about the future of Forest High School, given that it has been included in the Critical Infrastructure zone along with the hospital site. It is likely that this has been done to allow flexibility in the development of the hospital and related facilities, however it is Council's understanding that the High School will remain, but may be relocated or re-built on the western part of the existing site. There should be some undertaking given that the High School and its facilities will remain.

This proposed specialised centre is anticipated to accommodate in the order of 12,000 – 17,000 additional jobs (including 5,000 hospital jobs). The North-East subregion has a current target of 23,000 additional jobs by 2036, as set by the new Metropolitan Plan for Sydney 2036. It seems premature to proceed with the Frenchs Forest specialised centre rezoning prior to the review of the draft North-East Sub-regional Plan being completed and new targets set for Warringah, for both employment and housing.

Specific Comments

Natural Environment Comments

Flooding

Department of Planning should consider stormwater and overland flows in its detailed designs to minimise potential flooding impacts (including impact upon Manly Lagoon Catchment).

Catchment Management

Study overlooks several smaller watercourses in close proximity to the subject land. These are likely to be affected by any increase in impervious surfaces and removal of vegetation, which can lead to a decrease in water quality, increase in weeds, erosion of creek banks and increase in sediment. Recommend that any development meets the following criteria:

- Best practice Water Sensitive Design objectives must be adopted at all stages of development;
- No development, including asset protection zones, is to encroach into riparian lands. Where development has encroached into the riparian lands in the past, these areas are to be reinstated into its natural form to enable function as a sustainable ecosystem;
- All watercourses and riparian land within and surrounding the proposed precinct must be protected and remain in a natural and unmodified state in perpetuity
- No exotic plants or weed species are to be planted within the proposed precincts.

Biodiversity Management

The Study area contains extant patches of Duffys Forest Ecological Community (DFEC) which is listed as an endangered ecological community under the Threatened Species Conservation Act, 1995. Many of the proposed precincts contain large areas of mapped DFEC. There appears to be no consideration of this in the design or layout of the precincts. The study area also contains two mapped wildlife corridors, a priority one corridor and a priority two corridor. The proposed zoning of open space areas of DFEC will allow uses which are not consistent with the conservation of DFEC.

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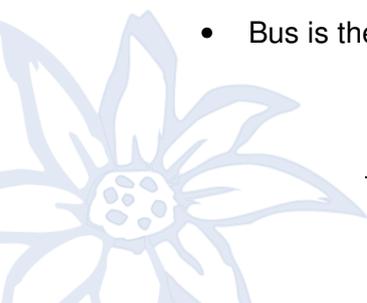
It is recommended that the constraints and opportunities should be amended to consider threatened biodiversity habitat, in particular the DFEC. Also, the layout of the precincts should be guided by the location of extent patches of DFEC and suitable offsets for the loss of DFEC should be provided.

Economic Development Comments

- Long term sustainable economic development of Frenchs Forest requires commitment by NSW Government to the new hospital. It is also essential that all associated major infrastructure be recognised as supporting the hospital through a co-ordinated intergovernmental approach.
- A new Specialised Centre requires collaborative planning across all relevant NSW State agencies, including NSW Industry & Investment, which is not referred in the documentation.
- More comparative details are required on the future role, size, function etc. of Brookvale/Dee Why, in relation to the proposed Frenchs Forest Specialised Centre.
- Frenchs Forest has potential to become an attractive location for small to medium high tech/green oriented companies.
- The links between a developing Frenchs Forest and Macquarie Park are important. Improvements to traffic and public transport links between the centres should be implemented to reinforce this.
- Should the Frenchs Forest Specialised centre evolve like Macquarie Park, then consideration should be given to development of a University in Frenchs Forest, to attract and give support to small to medium businesses.
- No specific reference to NSW Government's role in the marketing and branding of Frenchs Forest Specialised Centre.
- At what level of development is mass transit light rail required linking Frenchs Forest to Chatswood?
- No discussion of the length of construction phase or staging of the Warringah Road tunnel.
- The occupation and education profiles of Warringah LGA and the regional context of the SHOROC are well matched for the future employment profile of the proposed specialised centre.
- The overall proposal supports the core sustainable economic policy directions of the Metro Strategy and NSW State Plan to provide jobs closer to home and increase employment in strategic centres.

Traffic and Waste Comments

- Traffic Management
- The proposal, as well as increasing self-containment of trips will also increase local traffic flow within the surrounding Council network, which will need to be modelled.
- The proposal should consider the provision of public transport and the integration with Transport strategy.
- Bus is the only form of public transport in Frenchs Forest and bus transport is 10% of trips.



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- Proposals for fast public transport links outlined in SHOROC Shaping Our Future document require consideration of the existing capacity of Roseville Bridge to carry increased public transport loads including cyclists.
- NSW Bike Plan would need to be revised or updated as there are currently no high priority measures near the study area. Cycleways are to be integrated with the proposed road network and transport hubs.
- Trip generation Forecasts may require considerations at Forest Way, Bantry Bay and Frenchs Forest Road East.
- Public transport improvements also required.
- A PAMP should be developed to achieve and encourage walking and provide connectivity and accessibility to surrounding areas.
- Details of the location of the major bus interchange should be identified and include adequate commuter parking.
- It will be required to develop a traffic transport model to test development scenarios and the required road network and intersection infrastructure.
- Consideration needs to be given to local area traffic management measures to minimise traffic impacts on existing local roads.
- The Ring Road option needs to consider poor alignment/small curve intersection at Frenchs Forest Road East/Allambie Road and the sharp crest on Aquatic Drive near Madison Way.
- Wakehurst Parkway is nominated for future growth from Pittwater Road, however there is no consideration to improve flood mitigation measures with the additional capacity.
- The Warringah Bike Plan should be incorporated and where appropriate modified to fit in with all traffic management scenarios.

Road Assets

- Impact on local road network needs to be considered including issues such as traffic loading, structural capacity and pedestrian facility requirements.
- Traffic impacts during and after construction need to be considered on the local road network.
- Shared footpaths are to be a minimum width of 2.5m and footpaths a minimum width for primary routes of 2.0m

Development Engineering

- Proposed developments are to include the provision of on-site stormwater detention, in accordance with Council's On-Site Detention Policy document.
- Stormwater flows from any staged developments are to be confined to "state of nature" conditions for all storm events up to 1 in 100 year ARI storm event.
- Water reuse, in addition to on-site stormwater detention, is encouraged.
- Development impacting on Council's existing Stormwater Infrastructure will require upgrading and redesign in accordance with Council's Engineering Specifications and Policies.



Submission to Department of Planning

Summary

In summary, the following points are made:-

- Council supports the idea of a specialised centre for Frenchs Forest, predicated on it being in conjunction with construction of the proposed Northern Beaches hospital and also that it is properly investigated and planned before any development occurs;
- Construction of the proposed Northern Beaches hospital is critical and commitment to its construction should be a pre-requisite to any rezoning of Frenchs Forest as a Specialised Centre;
- It is considered that the critical issue with the planning of this proposed specialised centre is its impact upon regional and local traffic management and its impact upon the limited public transport services available. The TMAP, which is in its initial stages, should be completed and approved by all involved parties, prior to any rezoning of this land for specialised centre development. If this does not occur, then any SEPP amendment should require that the TMAP be completed in conjunction with an overall Master Plan and should be approved prior to any individual precinct Development Control Plan's (DCP's) or individual developments being approved;
- It is considered that in addition to the TMAP, an overall Master Plan for the proposed centre needs to be prepared (excluding residential land). Ideally this should be prepared before any amendment is made to the Major Development SEPP. If not, any SEPP amendment needs to provide for the preparation of this overall Master Plan and that this needs to be prepared and adopted before any individual precinct DCP's are approved and before any development is approved;
- Council should have control of all planning for residential development needed as a result of the specialised centre development. Therefore, all proposed land to be zoned R3 -Medium Density Residential, should be excluded from any amendment to the Major Development SEPP for the Frenchs Forest State Significant Site proposal;
- Council should be the authority to determine appropriate surrounding residential densities to support the specialised centre, as part of its detailed LGA wide Housing Strategy, which has been formulated with significant community involvement;
- Council is disappointed at the speed at which this proposal is being dealt with. It is considered that there should have been greater consultation with Council and the community. Also, the Transport Management and Accessibility Plan (TMAP), which has only recently been requested, should have been available at the time of exhibition;
- As a general comment, the level of detail available for the future development of the area, particularly in the area of traffic management, public transport and open space is considered an inadequate basis upon which to rezone the land for a specialised centre.

Conclusion

It is hoped that the Department of Planning will take Council's submission into consideration.

As the local authority affected by this proposed new specialised centre, there are considerable financial and other implications for Council and it is vital that if anything proceeds, that it is properly planned in conjunction with the Council and the local community.



3.3 Frenchs Forest State Significant Site Proposal

/11 RESOLVED

Cr Regan / Cr Sutton

- A. That Council endorse the comments included within this report and as outlined in the proposed submission at Attachment E to this report.
- B. That a copy of this report be forwarded to the Department of Planning as Council's formal submission on the exhibition of the Frenchs Forest State Significant Site Proposal.

VOTING

For the resolution: Crs Falinski, Giltinan, Regan, Sutton and Wilkins.

Against the resolution: Crs De Luca, Harris, Kirsch, Laugesen and Ray.

THERE BEING AN EQUAL NUMBER OF VOTES, THE MAYOR USED HIS CASTING VOTE FOR THE MOTION, WHICH WAS CARRIED.

