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Subject: Online Submission

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RE: Mod2019/0654 - 1 / 5 Skyline Place FRENCHS FOREST NSW 2086

I note the modified DA no. Mod2019/0654 for development of 78 seniors housing units and commercial space at 5 Skyline Place, Frenchs Forest. I have detailed below the reasons for my strong objection to this development.

1. Traffic

The following points are based on the fact that previous studies and plans have specifically identified that the area East of Wakehurst Parkway, where the above proposed development is located, is unsuitable for growth.

The Varga Traffic Planning assessment for this development, dated 16 December 2019, clearly states an increase in traffic of 39 vph and 50 vph for am and pm peak periods respectively. I cannot understand how Council or the Department of Planning can approve this when it directly contradicts the findings of the independent ARUP Detailed Transport Assessment of November 2016, and the Northern Beaches Council Final Structure Plan of August 2017.

Specifically, it contradicts the following findings and statements in those documents:

- "However, it (the road upgrades) does not cater for the additional growth anticipated in the draft Hospital Precinct Structure Plan as a result of Frenchs Forest being identified as a Strategic Centre. Further road upgrades will be needed to sustain Frenchs Forest as a successful Strategic Centre." (ARUP report Executive Summary, page 1.)
- "...the road network surrounding the Northern Beaches Hospital development has a limited capacity to accommodate additional growth beyond what was assumed in the RMS model." (ARUP report Section 1.5, page 9.)
- "Results suggested Frenchs Forest Road West would accommodate the Strategic Centre's traffic." (ARUP report section 3 page 26). By implication, Frenchs Forest Road East would not accommodate increased traffic.
- "No major growth is suitable for the area south of Warringah Road or east of Wakehurst Parkway." (ARUP report section 3.1.2 page 28.)
- Maps show no allowance for developments east of Wakehurst Parkway. (Hospital Precinct Structure Plan August 2017, pages 7, 9, 12, 14, 15)
- "Traffic modelling has indicated that in the short term, the precinct can support up to 3,000 dwellings concentrated around the town centre with specific road and intersection upgrades. The provision of further dwellings ... in the medium to long term would require the delivery of significant regional roadworks, including the proposed Beaches Link Tunnel, and an east-west bus rapid transit (BRT) system from Chatswood to Dee Why." (Hospital Precinct Structure Plan August 2017, section 5, page 34).

In the light of the above I pose two questions for the Department of Planning and Northern Beaches Council:

1. How can this development be given approval when it flies in the face of the State Government's and Council's own reports and documents?
2. Already we have the Parkway Hotel site being redeveloped. Have these traffic implications been factored into consideration?

Furthermore:

The Varga Traffic Planning assessment is fundamentally flawed.

Their traffic assessment is based on 56 dwellings (pages ii and iii of their report) whereas the development application is for "78 Seniors Housing Units".

I believe this is sufficient for the application to be rejected on these grounds alone.

Nevertheless, below are some additional points which should be considered:

2. Parking:

I believe the Varga assessment has underestimated the demand for parking. The loss of street parking on Frenchs Forest Road between Wakehurst Parkway and Romford Road, and at the now closed Parkway Hotel site, has already led to an intolerable situation in the side streets.

The proposed development will make it worse.

3. Locality

The Southern side of Frenchs Forest Rd East is business park. Residential development should be restricted to the Northern side of the road to be in keeping with the current, balanced character of the locality. If you want residential development in this area, rezone the Northern side of the road. This will be welcomed by residents.

Department of Planning and Council must refuse this development.