

10 July 2025

Mr Stephen Dobbs

Email: stephen.dobbs@dpie.nsw.gov.au

Our Ref: 2025/415235

Dear Mr Dobbs,

Council Comments - SSD-69850712 - 1-3 Skyline Place, Frenchs Forest

Thank you for your correspondence dated 5 June 2025 requesting Northern Beaches Council's advice on the Exhibition of SSD-69850712 for Senior's Housing and Mixed-Use development at 1-3 Skyline Place, Frenchs Forest.

Please find the attached appendix outlining Council's key concerns.

In summary, Council raises concern that the height and scale of the development is inconsistent with the existing and emerging character of the area. Concern is raised as to the visual impact and contextual appropriateness of the proposed height (being up to 14 storeys).

Council also raises significant concern with the compatibility of the development in relation to the objectives of the SP4 Enterprise zone under the Warringah LEP 2011, and various other Council documents with Strategic Planning objectives (see Strategic comments in appendix).

Specifically, there are fundamental concerns regarding the intensity of the residential land use on the site. The subject site is located within the Frenchs Forest Business Park, which performs as employment land and has the potential to contribute to a range of economic opportunities associated with the hospital. Extensive residential use of the site, disproportionate with the commercial uses would conflict with the surrounding uses and zone objectives by interrupting the primary economic functions of the zone.

Council's response also outlines a lack of appropriate response to local controls, potential adverse environmental and amenity impact, significant visual impact, and lack of response to established and emerging character (including landscape setting and urban forest character of Frenchs Forest).

For these reasons and others outlined in detailed comments below, Council does not support the State Significant Development application.

Should you require any further information or assistance in this matter, please contact Mr Tom Prosser Principal Planner on 8495 6499.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'M. McDonald', with a stylized flourish extending from the end.

Mal McDonald
Acting Director, Planning & Place Division

APPENDIX 1 - DETAILED COMMENTS FOR SSD-69850712 NORTHERN BEACHES COUNCIL

1. Strategic Planning

Summary

The proposal seeks to redevelop two large existing sites (2.2 hectares) in the Frenchs Forest Business Park, which is zoned SP4 Enterprise under Warringah LEP 2011. This land is part of the broader surrounding area of Rodborough Road and Warringah Road that is a major business park / employment area with the Northern Beaches LGA. The SP4 Enterprise land is characterised as a business park style area with a mix of large warehouse and smaller light industrial / commercial uses. Many sites cater for small to medium businesses and accommodate a wide range of employment options and business opportunities for people living in or near the northern beaches.

There has been major strategic land use change within the vicinity of the Frenchs Forest Business Park. In 2022, the NSW Government rezoned land known as the 'Frenchs Forest Precinct' located west of Wakehurst Parkway to implement the NSW Government's Frenchs Forest 2041 Place Strategy and facilitate 2,000 new homes and 2,000 new jobs. The Place Strategy does not identify any land use change for the Frenchs Forest Business Park. Rather, it reinforces the importance of the business park in delivering important employment outcomes for the Northern Beaches and North District.

Frenchs Forest Business Park

Council's strategic planning framework and supporting studies do not contemplate residential uses of any form in the SP4 Enterprise zone in Frenchs Forest. This is a deliberate policy position of Council to ensure that the Frenchs Forest Business Park continues to support an innovative, diverse and resilient local economy. Council's strategic planning recognises that there is ample residential zoned land in the Northern Beaches that infill residential development (including seniors housing) can occur.

The Frenchs Forest Business Park is transitioning. It features established light industrial and professional office floorspace in a pleasant, landscaped business park environment. The low level of residential encroachment in the precinct, its potential for more intensive 24-hour automated operations, its ability to receive B-Double trucks due to its geography on the top of the ridgeline and its location at the nexus of the Northern Beaches road network will continue to drive investment in the Business Park.

The Business Park is transitioning away from co-located campus operational models (i.e. traditional business park environment) towards a light industrial role. Growth is forecast in domestic manufacturing industries. This includes industries such as high technology industries, advanced manufacturing, renewable energy, electric vehicle technologies, energy storage systems, automation, artificial intelligence, 3D printing, warehousing and logistics, online retail and last mile freight services. These uses typically require space to operate and the ability to function without restriction on activity and hours of operation that can result from

land use conflict. The growth of economic precincts is a long term enterprise and therefore it is essential that land use planning supports and strengthens this outcome.

The current absence of residential land use is a key differentiator for this employment land precinct from others in the region. Removing this point of difference would impact the attractiveness of this business park to prospective businesses and undermines its ability to cater for a diversity of business types, affecting the resilience of the Northern Beaches economy.

Desired future character and objectives of the SP4 Enterprise zone

Strategic Planning does not support the proposed development in its current form as the quantum of residential uses in the form of seniors housing is inconsistent with the desired future character and objectives of the SP4 Enterprise zone in Frenchs Forest.

As specified in Council's local planning documents (Local Strategic Planning Statement, Local Housing Strategy, Employment Study, Hospital Precinct Structure Plan), the desired future character is to encourage a range of employment generating uses (primarily office and light industrial uses) and preserve the land for future specialisation and innovation in its future employment options. In recent years we are seeing development in the park supporting last mile logistics operations and strata industrial unit style developments which cater to the needs of our strong local small business community.

According to the Economic Impact Assessment report by Hadron Group, the commercial floorspace totals 1,750 sqm, comprising a minimum of 1,200 sqm at 1 Skyline Place and 500 sqm at 3 Skyline Place, with employment estimates based on this 1,750 sqm. The proposed development breakdown is as follows:

- Residential: 42,150 sqm (94% of total floorspace)
- Non-residential: 2,850 sqm (6% of total floorspace)

The balance between residential and non-residential floorspace is inappropriate when considering the objectives of the SP4 zone and strategic planning context. The residential floorspace dominates the development with the employment floorspace subservient to the entire development.

The opportunity cost of the conversion of this site away from employment focused use must be considered. The reduction in employment floorspace and capacity is concerning. The Northern Beaches Employment Study (2019) identified a shortfall of industrial floorspace on the Northern Beaches. With no opportunity to expand industrial zoned land on the Northern Beaches, the transition of Frenchs Forest Business Park to meet this shortfall is critical to meeting market demand and supporting our transitioning local economy.

The future implications of this development on limiting the operational capacity of surrounding sites cannot be ignored. The greater the heights permitted, the greater these impacts will be on the surrounding business park. A large population of seniors living dwellings will likely result in strong opposition to intensification of light industrial uses on surrounding sites particularly on noise

and visual impact grounds. The result will be to restrict the operational capacity of the surrounding business park which is unacceptable.

Building Height

Warringah LEP 2011 does not specify a maximum building height for Frenchs Forest Business Park. The intention was to provide flexibility for employment uses noting that no residential uses are permissible for Frenchs Forest Business Park under Warringah 2011 LEP.

A height limit of 11m is proposed under the Draft Northern Beaches LEP which is currently with the Department of Planning, Housing and Infrastructure awaiting gateway. Our intention is to strengthen the role of Frenchs Forest Business Park to support its transition from combined office/industrial campus style built form towards and increasingly light industrial role and function under the SP4 Enterprise zoning with bonus height incentives for employment uses.

The future implications of this development on limiting the operational capacity of surrounding sites cannot be ignored. The greater the heights permitted, the greater these impacts will be on the surrounding business park. A large population of seniors living dwellings will likely result in strong opposition to intensification of light industrial uses on surrounding sites particularly on noise (Sound travels up) and visual impact grounds. The result will be to restrict the operational capacity of the business park which is not acceptable SP4 Zone.

Strategic Planning recommend that heights should not exceed the height of surrounding tree canopy in line with our previous advice to ensure appropriate buffering from surrounding future light industrial land uses.

Contributions Policy

Council's local infrastructure planning has not planned to accommodate residential population in the Frenchs Forest Business Park. A development of this scale will place additional strain on local infrastructure such as road, waste and stormwater assets.

Recommendations

- The Environmental Impact Statement (EIS) shall address the relevant goals and strategic planning objectives in the following Council documents:
- Northern Beaches Local Strategic Planning Statement (Towards 2040)
- Northern Beaches Hospital Precinct Structure Plan
- Northern Beaches Public Space Vision and Design Guidelines
- Northern Beaches Environment and Climate Change Strategy 2040 (Protect. Create. Live)
- Northern Beaches Climate Change Action Plan
- Northern Beaches Disability Inclusion Action Plan 2017-2021

2. Development Assessment

Summary

Council's Development Assessment team does not support the concept based on the height and built form not providing an appropriate contextual fit to the surrounding business park, recent development approvals, and the established pattern of development in the area.

Further, the proposed intensity of residential use on the site is incompatible with the zone objectives which primarily relate to advancing economic activity.

The extent of residential use has the potential for significant conflict with the strategic objective for this regionally important economic precinct. With extensive residential use of the site, there is also more potential for land use conflicts and residential amenity to be impacted by noise for occupants, truck movements, hours of operation of nearby businesses, accessibility, safety, and amenity impact on surrounding residents associated with increased traffic and noise.

Character, visual impact and context

The proposal would introduce a new form of development in the area that is up to 45m (14 storeys in height). This height is greater than the nearby Northern Beaches Hospital (40m) and rezoned building height controls for the adjacent Frenchs Forest town centre, which was rezoned in 2021 as a State led Precinct.

The proposed use and built form bear little relationship to the hospital, with the hospital being separated from the Enterprise zone by areas of bushland and the Wakehurst Parkway. The hospital also provides unique form of development in the area. It is associated with a transition in land use and is not reflective of the character or desired character of the Enterprise zone. As such, providing a building height that is comparable to and greater than the hospital is misguided.

Alternatively, the proposal would be better to consider nearby development and recent nearby development approvals within the SP4 Enterprise zone to provide a built form including height of building that is contextually appropriate for the urban forest character formed at this section of the locality.

At 39 Frenches Forest Road, the Land and Environment Court approval for the Parkway Hotel Development involved a 6-storey height approved (23m) and included a 30m setback to Warringah Road.

At 5 Skyline Place on Lot 2 (fronting Frenchs Forest Road), a Development Application (DA2018/0995) originally sought 9 storeys (26.5m) but was later reduced to 6 storeys (18.8m) via a S8.2 Review of Determination approval by the SNPP. This reduction of 3 storeys and 7.7m was to satisfy the Panel's concerns in relation to excessive and incompatible building height within the B7 zone and interfacing with the adjoining R2

Low Density Residential zone. As a part of amendments, there was also an increase in commercial floor space from 1,348sqm to 2,219sqm (871sqm increase).

At 5 Skyline Place on Lot 1, a Development Application (DA2021/0212) was refused by the Sydney North Planning Panel for reasons including that the bulk and height of the proposal was incompatible with the existing and future character of the area.

The proposal under DA2021/0212 was later approved in the Land and Environment court process after a reduction from 12 storeys to 7-8 storeys.

Strategic and legislative context has changed since these approvals in that the land zone has changed from B7 Business Park to SP4 Enterprise, and the SEPP HSPD (2004) has been repealed and replaced with SEPP Housing (2021). Nonetheless, the objectives of the land use zone maintain similar functions in relation to the promotion of economic activity, and principles under the SEPP related to context, character, built form and scale remain key items for consideration and determination.

Having regard to the visual impact assessment provided, significant concern is raised with the visual prominence of the 14-storey building to be well above the surrounding tree canopy, and viewable from various locations within the Northern Beaches and around Sydney given the location on top of the ridge. A building of this nature would establish a new character for the Business Park and the Frenchs Forest area, changing perception of the greater area that is currently seen with a hospital and varying other types of development within an urban forest (below the tree canopy).

This is inconsistent with the following overarching objectives of the Warringah DCP (Clause A.5):

- *To ensure development responds to the characteristics of the site and the qualities of the surrounding neighbourhood*
- *To protect environmentally sensitive areas from overdevelopment or visually intrusive development so that scenic qualities, as well as the biological and ecological values of those areas, are maintained*

It is also inconsistent with the following objective of the SP4 Enterprise zone:

- *To create business environments of high visual quality that relate favourably in architectural and landscape treatment to neighbouring land uses and to the natural environment.*

It is also recommended that further consideration be given to the visual impact from other prominent locations such as Manly Dam, Wakehurst Parkway, Wakehurst Golf Course and National Parks. Also, further analysis and consideration should be given to various locations within nearby residential zones, noting that the current analysis is limited to locations where existing topography restricts visual prominence.

Response to Local Controls

An assessment and comments are provided in relation to the proposed built form of the Stage 1 DA (3 Skyline Place). The controls are also relevant for consideration of any future built form proposed under Concept DA (1-3 Skyline Place).

The relevant local controls under the Warringah DCP are outlined in the table and discussed below.

| Built Form Control | Requirement | Proposed | Complies |
|---|-------------|-------------|----------------------|
| B4 Site Coverage | 33.3% | 45.6% | No |
| B5 Side Boundary Setback | Nil | Nil | Yes |
| B7 Front Boundary Setbacks (Frenches Forest Road) | 10m | Concept DA | Potential to comply |
| B9 Rear Boundary Setbacks | Merit | 9m-18m | Merit (see comments) |
| B14 Main Roads Setback (Warringah Road) | 30m | 13.5m-16.5m | No |
| D1 Landscaped Open Space (LOS) and Bushland Setting | 33.3% | 34% | Yes |

- **B4 Site Coverage**

The site has a control of 33.3% of the site. The proposed site coverage for the Stage 1 DA is 45.6%. Clause B4 under the Warringah DCP partly aims:

- *To provide opportunities for the provision of landscaping and the enhancement of existing native vegetation.*
- *To minimise the bulk and scale of development.*

Given the incompatibility of the proposed building height and the associated visual impact of the development, a building footprint that covers 45.6% of the site does not appropriately minimise bulk and scale. Further, the proposed building heights will be above tree canopies, and the extent of built form on site will dominate the presentation of landscaped features on the site.

The combination of site coverage and extensive vertical massing, provides a circumstance in which the proposal does not respect the characteristics of the site and the qualities of the surrounding neighbourhood. Specifically, the built form would dominate the urban forest character of Frenches Forest area.

- **B7 Front Boundary Setbacks**

The site has a control of 10m for front boundary. This control is applicable to Frenches Forest Road. The Concept DA establishes that future built form could comply or respond well to this control.

- **B9 Rear Boundary Setbacks**

The site has an unusual lot configuration with access being available only from a small frontage to Skyline Place. The lot has a large frontage to Warringah Road, but with restricted access and separate setback controls. For purposes of this advice, the boundary on the northern side of the site, adjoining 1 Skyline Place is considered to be the rear setback due to the intention of the control and the sites context with surround lot configurations, and its relationship with Warringah Road and Frenches Forest Rd East.

Although the proposal provides reasonable separation to the rear lot, as above, concern is raised with the vertical massing and dominance of built form on the site. A greater rear setback may help to reduce this built form dominance.

- **B14 Main Roads Setback**

The site has a control of 30m a Main Roads setback. This control is applicable to Warringah Road.

The proposal seeks a significant departure from this control (55% variation), in a circumstance where the prevailing building line along this section of Frenchs Forest Road, responds well to the numerical control. Specifically, nearby site respond to the Main Roads setback numerical control as follows:

- 4 Skyline Place: This is the neighbouring site directly to the west and has a Main Road setback that is generally 30m.
- 39 Frenchs Forest Road: There is a DA approval for a 6 storey Hotel has a setback that is generally 30m.
- 25 Frenchs Forest Road: The existing built form on this has a setback to Warringah Road that is well in excess of 30m
- 49 Frenchs Forest Road: This is the only site in the vicinity that has a prevailing front building line that is comparable to the proposal, being approximately 13m-16m. However, it is noted the scale of the built form and lot dimensions are not comparable to the subject site and proposal.

Overall, the example of the reduced setback to the western neighbour does not establish a prevailing building line for this section of Warringah Road, and the height and scale of the development would be better matched to being provided with a setback that corresponds with the wider lots, and larger buildings (and approvals) in the vicinity.

- **D1 Landscaped Open space and Bushland setting**

The site has a control of 33%. The proposal complies 34%.

Despite no concern being raised with this clause specifically due to compliance with the numerical control, additional landscaped area could contribute to providing a better merit outcome for the site by reducing the dominance of built form.

- **D9 Building Bulk**

The design of the building includes extensive wall planes up to 14-storey high along the side elevations, which translates into excessive building bulk that is incompatible and inconsistent with the surrounding predominant pattern and scale of other development within the area.

The built form has a lack of articulation and breaks at the front and side elevations.

Warringah LEP Zone objectives and site suitability

The objectives of the zone follow:

- *To provide for development and land uses that support enterprise and productivity.*
- *To provide healthy, attractive, functional and safe business areas.*

- *To minimise conflict between land uses in the zone and adjoining zones and ensure the amenity of adjoining or nearby residential land uses.*
- *To create business environments of high visual quality that relate favourably in architectural and landscape treatment to neighbouring land uses and to the natural environment.*
- *To provide a range of facilities and services, light industries, warehouses and offices.*
- *To provide opportunities for new and emerging light industries.*
- *To restrict retail uses to ensure sufficient land is available for industrial and light industrial uses to meet future demands*

The proposal provides the following percentage use of floorspace on site:

- Residential: 42,150 sqm (94% of total floorspace)
- Non-residential: 2,850 sqm (6% of total floorspace)

The extent of residential use within this site is inappropriate with the Business Park's important economic and employment role to the Northern Beaches region and North District. The proposed extent of residential use does not relate well to the objectives of the zone or other various local strategic framework as further discussed under the Strategic Planning section of this appendix.

It is therefore advised that the extent of residential development should be significantly reduced to provide a form of development that could be suitable for the site.

SEPP Housing (2021)

The design principles in Schedule 8 of the SEPP (Housing) 2021 for Context and Neighbourhood Character are relevant for consideration. For the reasons outlined in the Character, context and visual impact section above, concern is raised with regard to consistency of the proposal with the following principles:

- “(a) to recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation,*
- (b) to recognise the desirable elements of—*
 - (i) the location’s current character, or*
 - (ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area,*
- (d) to maintain reasonable neighbourhood amenity and appropriate residential character by—*

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- (i) providing building setbacks to reduce bulk and overshadowing, and*
- (ii) using building form and siting that relates to the site’s land form, and*
- (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and*
- (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours,*
- (e) to set back the front building on the site generally in line with the existing building line.”*

Similarly, concern is also raised that the proposal fails to respond appropriately to Chapter 4 of the Seniors Housing Design Guide. It is advised that there is a lack of response to surrounding local context and character and also lack of response to the specific characteristics of the SP4 Enterprise zone.

Having regard to the potential for conflict between land uses and the associated negative impacts on residential amenity, it is strongly recommended that the provisions of the Apartment Design Guide (referred to in Chapter 4 of the SEPP) are closely adhered to.

Conclusion

The assessment of this application concludes that the proposal has not responded adequately to local context and the elements that make up the existing and desired future character of the site under the planning controls and strategic objectives.

It also establishes that there is an identifiable character forming in the immediate area, related to the promotion of economic activity with provision of residential uses in circumstances only where suitable control on height and density can result in suitable outcomes related to visual presentation, environmental impacts and amenity impacts. For these reasons, it is advised the proposal is not an appropriate development for the site.

The assessment has also found that the extent of residential use within this site has the potential to provide significant conflicts between lands uses. This would affect the amenity of surrounding locality into the future. This includes impact of the development on other business, amenity concerns associated with the hours of operation of surrounding commercial and industrial uses and impacts to residents of the surrounding localities.

The assessment of the proposed development against the provisions of WDCP 2011 found that the proposal was not consistent with Built form Controls as it relates to Site Coverage and Main Road setback (Warringah Road). These numerical non-compliance with the local planning controls contribute to a development that is inappropriate contextually.

It is also advised that there is a lack of response to local character and context to ensure consistency with the provisions of SEPP Housing 2021, including the Seniors Housing Design Guide.

A development that significantly reduces the height of the building, a reduction to the number of dwellings, and a reduction in the dominance of built form should be provided that responds to the unique urban forest character.

3. Urban Design

It is acknowledged that the design strategy has been established as a result of consultation with the SDRP in two pre-DA review sessions, as well as alignment with the Housing SEPP, and Seniors Housing Guide. A comprehensive assessment against the relevant provisions of these documents has been provided in Appendix 7, addressing many of Council's Urban Design considerations. Further considerations at this stage have been outlined below:

Bulk and scale

- Buildings D and E (1 Skyline Place) on Frenchs Forest Road at six storeys are consistent with the emerging character to the south of Frenchs Forest Road and to the west of the subject site, including the Jardin development.
- A transition to eight storeys is above the six and seven storey buildings proposed, but is concentrated in the middle of the site.
- Building C at 14 storeys at the southern corner of the site along Warringah Road is not consistent with height and density in this location and represents an overdevelopment of this portion of the site.
- The height of Building C is over 45 metres (as shown on Stage 1 DA Drawing 202). The Northern Beaches Hospital has a height of 40 metres. A height of 14 storeys is unjustified and unsupported.
- The maximum height for Building C should be six storeys, consistent with the western part of Building C and consistent with the transition of height at the perimeters of the subject site.

Visual Impact

- Justification in the Design Report (Appendix 7) states 'the tallest building form is positioned where it has the least visual impact on existing residential neighbourhoods and has the least overshadowing impact on common areas', however, there is significant visual impact from all views outlined in the Visual Impact Assessment. This includes from various points in Frenchs Forest, from Warringah Road, and from the Sydney CBD.
- The 14 storey tower is well above the established tree canopy and not consistent with existing and future character of this area. It will have a negative impact on the skyline, and near and far views, due to its dominance and prominence at a comparable height to the hospital.

4. Traffic

The proposal is for 160 ILU's on 1 Skyline Place, 200 ILU's and 20 RAC beds on 3 Skyline Place plus ground floor commercial uses (1200m² on 1 Skyline and 546m² on 3 skyline) such as physiotherapy, gym and shops.

Summary

With the proposed Frenchs Forest Priority Precinct to the west of the site and the adjoining Commercial and business park area undergoing some redevelopment as a result, the Road Network impacts need to be considered in this context and not just from a single site perspective.

Comments

Traffic Generation

The Traffic generation of the site has been estimated by the applicants traffic consultant based upon a rate of 0.09 trips/dwelling for the seniors living and RAC components. It is unclear where this rate has been sourced as the TfNSW Guide to Transport Impact Assessment recommends that weekday peak hour rates of 0.3 trips per dwelling should be used for housing for seniors with a weekday pm peak hour rate of 0.17 trips per dwelling. It is also noted that the TfNSW guide recommends rates of 0.192A for AM peak hour traffic generation and 0.359A (where A = GLFA) from small suburban shopping centres and this rate would differ from the 1.69 trips and 1.2 trips per 100m² used by the applicants traffic consultant.

The amended rates Council believes to be appropriate for use would yield significantly higher traffic generation rates than those assessed by the applicant. It is also noted that the proposed development on 3 Skyline Place is proposed to provide 326 parking spaces well in excess of the 270.5 spaces required under SEPP/DCP requirements.

It is also noted that the 283 parking spaces proposed for residents is well in excess of the 255 spaces required under the SEPP. The higher level of parking is likely to attract higher levels of car ownership and hence higher traffic generation than the 0.3 trips per dwelling assessed under the TfNSW Guide.

The applicant should therefore be required to revise the Transport and Accessibility Impact Statement in light of the anticipated higher levels of traffic generation.

It is also recommended that the SIDRA modelling undertaken based upon the incorrect traffic generation rates should be revised, including Network modelling of Frenchs Forest Road East

Road infrastructure requirements:

Council suggests that the following improvements be required in conjunction with the development

- Accessible pathway links to Skyline Shops (Frenchs Forest Road East), Northern Beaches Hospital and within Skyline Place.
- Appropriate upgrades to the intersection of Skyline Place with Frenchs Forest Road East (probably to incorporate a signalised intersection with pedestrian phases on all legs). The signalisation of the Skyline Place intersection will facilitate ease of access to/from bus stops on either side of Frenchs Forest Road East to meet access to public transport requirements outlined in the SEPP.

The introduction of traffic signals may also require widening of Skyline Place to create additional storage capacity on approach to Frenchs Forest Road East while retaining existing kerbside parking on both sides of the road. The concept plan for a raised pedestrian crossing that has previously been considered by the

traffic committee is considered likely to be inadequate in light of the additional traffic and pedestrian demands generated by the current proposals. Signalisation of the intersection with pedestrian phases on all legs is considered a superior outcome with wider road network benefits.

- Potential need for slip lanes and/or right turn protection storage bays on for safe right turn entry and exit from Frenchs Forest Road East

Internal Road Network

The basement carpark network appears to allow for two way vehicle circulation and appears to be designed adequately.

Pick up and drop off requirements:

- Pick up/ Drop off provision should be through a combination of onsite short term drop off/pick up facilities and a mix of high and medium turnover restricted parking within the site, this may include facilities for mini-bus vehicles / Taxis / 'Uber'.
- Emergency vehicle access and evacuation locations.

Parking provision:

- The quantum of visitor parking at 22 is too low. Although the SEPP is silent in terms of visitor parking requirements it is assumed that visitor parking is required as the residents will obviously have visitors. The Warringah DCP requires 1 visitor space for each 5 units. For 200 units this would equate to 40 visitor parking spaces. As the residential parking supply exceeds SEPP requirements some of the residential parking should be reassigned as visitor parking to meet the Warringah DCP requirement.
- The offstreet Loading Bay which caters for a Council's 10.5m waste collection vehicles is adequate and would also serve the offstreet parking requirements for removalist trucks adequate overhead clearance to/from and within the Loading bay of 4.5m must be demonstrated.
- Offstreet parking must allow for appropriately dimensioned parking spaces allowing for manoeuvring to enable forwards entry and egress consistent with the requirements of all parts of AS/NZS 2890.

Bus operation requirements:

- Appropriate level and convenient access to bus transport will be required for such a large development. It should be noted that 'Seniors living' does not mean that all residents / occupant are not working since many persons work throughout their 60's and beyond. Additionally, persons working in aged care industry at any age can live within such a development, including children that may be cared for by grandparents or other elderly relatives. Therefore, safe access and DDA compliant access to and from public transport and within the premises are considered an important priority.
- The abovementioned signalised pedestrian crossings at the intersection of Skyline Place and Frenchs Forest Road East would facilitate safe and acceptable pedestrian access to/from public transport

Active transport provision:

- The proximity to Northern Beaches Hospital is not determinative to suitability of the site. Senior persons would still require car / ambulance transport to get to the hospital (if indeed that was the preferred patient venue). Facilities on site to cater for ease of access to ambulances have been proposed on 3 Skyline Place.
- Access to Forestway shopping centre (1.2km) is not considered an easy path of travel from the site for the principally aged demographic potentially including persons with disabilities). Active travel even an able bodied person is difficult and inconvenient given the major intersection crossings to be negotiated. Council does however want to reduce private vehicle travel and promote the use of active and public transport where feasible. It is noted that the increased use of E-bikes makes travel by bicycle more convenient even in challenging terrain or for the less mobile. This aspect must be carefully reviewed and facilities for pedestrians and cyclists incorporated to facilitate active travel.
- Impact of the development (including at various construction phases) on the available parking in the local area will need to be considered and addressed where issues are raised. Existing on-street parking should not be lost.

Additional items of concern and requirements may be applied during the ongoing review to address any issues that may come to light as a result of revised traffic reporting.

5. Catchment – Water Management

The supplied documentation for DA2025/0679 titled '1 & 3 Skyline Place, French Forest Integrated Water Management Plan', dated February 2025 has been reviewed by the Coast and Catchment team against Council's Water Management for Development Policy objectives. The document only addresses water management for the development of 3 Skyline Place.

Water Quality - The proposed stormwater treatment chain includes a rainwater tank, minor stormwater reuse for irrigation and a chain of pits with baskets and a proprietary filter cartridge system, prior to the connection with the adjacent stormwater network system along Warringah Road. The Catchment team is not the approval body for this connection and does not know who owns the stormwater pipes along Warringah Road, if it is Council or Transport for NSW.

The proposed treatment chain performance is satisfactory in principle and meets Council's Water Management for Development Policy criteria for pollutant reduction.

Groundwater - the proposal includes below ground works, such as excavation for basements. The geotechnical report and groundwater report states there is likely to be groundwater interference but does not detail whether the basements are to be tanked or not and does not highlight any potential dewatering requirements during construction.

Erosion and Sediment Control - As the proposed development is in the headwaters of Curl Curl Creek in the Manly Dam catchment, a high-quality catchment, it is recommended that the proponent prepare a more detailed erosion and sediment control plan for the site than provided in the Integrated Water Management Plan, which connects to the Warringah Road stormwater system. The Catchment team is not the approval body for this connection and does not know who owns the stormwater pipes along Warringah Road, if it is Council or Transport for NSW.

6. Waste

3 Skyline will be the first build followed by 1 Skyline. 206 units plus retail/commercial 545m²

- BLD A – 43 units across 7 levels
- BLD B – 56 units across 7 levels
- BLD C1 – 65 units across 13 levels
- BLD C2 – 42 units across 5 levels

149 Independent Living Units within 4 building cores.

4 basement waste storage rooms with chutes can be identified on the plans and a waste holding bay.

There is no commercial waste room shown on the basement plans for the development. A commercial waste area is shown in the Waste Holding Bay. This must be a separate screened location to the domestic waste which will need to be accessible for a private commercial contractor to service and must not be accessible by residents. Consideration may also need to be given to medical waste for RACF's. Residential waste storage rooms must not be accessible to commercial operators within the development.

The plans specifies 660L bins not the standard Northern Beaches Council 240L bins. This can be accommodated for this development.

Collection of domestic waste, recycling and bulky waste will be by council's domestic waste contractor using the standard service of a 10.5m HRV requiring 4.5m clearance throughout.

Plans submitted with the Waste Management Plan should demonstrate the path that the building manager will have to take to get bins from the chute rooms to the bin holding bay and that path should be a dedicated pathway that does not intersect the vehicular driveway on collection days or via a dedicated service lift from B1 to the waste holding bay. Bulky waste would be collected every 5 weeks approximately based on the number of units and similarly bulky waste needs to be transported to the holding bay for collection via a dedicated pathway or service lift.

Space for bin moving equipment should be shown on the plans.

Council supports the collection of waste in cores with dedicated waste chute rooms for each core for putrescible waste with provision of residential recycling bins adjacent to the waste chute on each residential floor of the building, with spatial provision for spare 240L MGBs to be stored within the waste room at the base of each chute.

Door openings to recycling bin rooms on each level to be minimum 1,200mm (each leaf) opening outwards. Recycling bins will be collected from each level by the building manager as required and moved to the bin holding bay the day prior to collection day. Paper and container recycling will both be weekly.

1 Skyline Place:

3 buildings with varying levels

149 residential units in total, separated into 4 cores;

- BLD A – 30 units across 5 levels
- BLD B1 – 27 units across 5 levels
- BLD B2 – 50 units across 7 levels
- BLD C – 42 units across 7 levels

5 retail/commercial tenancies with a total GFA of 1,864 m²

3 Skyline Place:

3 buildings with varying levels

206 residential units in total, separated into 4 cores;

- BLD A – 43 units across 7 levels
- BLD B – 56 units across 7 levels
- BLD C1 – 65 units across 13 levels
- BLD C2 – 42 units across 5 levels

3 retail/commercial tenancies with a total GFA of 545 m²

7. Landscape

The site is in close proximity to the Frenchs Forest Town Centre where the desired character is an urban forest with green streets, making a feature of the forest. To achieve this the Warringah DCP control B14 Main Roads Setback objectives and requirements shall be incorporated to provide a dense landscape buffer between the development and the main road of Warringah Road within the required 30 metres, free of structures above and below the natural ground. The proposal does not satisfy this requirement.

In seeking to increase building heights, the quantity of landscape area shall be adequate to soften the built form and thus the required landscape area shall be satisfied.

From the visual assessment it is clear that the forested ridgeline will be disrupted and there is no analysis from local areas of high use in proximity such as Manly Dam, Wakehurst Parkway and the National Park.

The indication to preserve the trees in the biodiversity zone along the frontage of Frenchs Forest Road, the western boundary areas and the frontage of Warringah Road shall ensure that no encroachment by structures and by stormwater management or design elements occur.

Easements shall be located away from existing trees identified for retention, as this will increase tree canopy loss..

Deep soil areas shall be part of the retention of existing trees and otherwise shall be provided to encourage tree canopy to communal open space areas for outdoor comfort.

Proposed planting on structure requires appropriate structural slab design over-and-above typical slab design and construction, to support the 'wet weight' of soil, plants and other materials. All on slab planted areas shall meet the ADG requirements for soil depth.

New tree and understorey planting along the frontages of Frenchs Forest Rd East and Warringah Rd shall be mainly native.

Include a range of tree planting in all boundary setbacks to ensure appropriate buffers are established as planting matures; large and medium trees for canopy; small trees and large shrubs for establishing the mid-storey. The inclusion of mid-storey planting is particularly important for the Frenchs Forest Rd East and Warringah Rd frontages.

Consider shade impacts from the built form along the Warringah Rd frontage when selecting plant species.

Include large tree species between the 14-storey portion of Building C and Warringah Rd.

Prioritise retention of prescribed trees around the perimeter of the site particularly the biodiversity values area fronting Frenchs Forest Rd East.

Prioritise high/medium significance tree retention over pathway locations. Pathways can be directed around trees using tree sensitive construction techniques as directed by an Arborist.

Articulate basement walls where possible to retain high significant trees.

Selected plant species shall not be priority or environmental weed species. Remove all proposed *Rhaphiolepis* from the plant species list; although a cultivar is selected this species is deemed an environmental threat.

No impact to trees and vegetation in the road reserve or neighbouring properties is permissible.

8. Engineering

On site stormwater detention is to be provided for the development in accordance with Councils Water Management for Development Policy . The pre developed stormwater flow conditions are to be assumed as state of nature up to the 1/100 AEP storm event.

The stormwater management system is also to include climate change factors in accordance with section 4.2 of ARR 2019.

Any stormwater connection to Warringah Road will need Transport NSW approval/concurrence.