

Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124

1st September 2021

To whom it may concern,

RE: Draft Frenchs Forest 2041 Place Strategy

Thank you for the opportunity to comment on the draft Frenchs Forest Place Strategy. Bicycle NSW has been the peak bicycle advocacy group now in NSW for over forty-five years, and has over 30 affiliated local Bicycle User Groups.

Our mission is to make cycling better for everyone in NSW, and we support improvements to the pedestrian environment and advocate for new cycling routes that incorporate dedicated paths within the road environment and in green corridors, providing connections to jobs, schools and services for daily transport and recreation trips. Cycling provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

Frenchs Forest 2041 covers the Phase 1 area of Northern Beaches Council's Hospital Precinct Structure Plan which sets out a three-phase delivery of approximately 5,360 dwellingsⁱ and 2,300 new jobs over the next 20 years. The Place Strategy has a vision for Frenchs Forest *"as an urban forest, with green streets and new open space.... (The precinct) will provide character and great places; it will foster healthy and connected communities, attract families and encourage new business. It will set the benchmark for health and wellness, liveability and prosperity in a new urban centre"*ⁱⁱ. The 5 Big Moves aspire to create **an attractive new town centre that will be an asset to the Northern Beaches** (Figure 1) and Bicycle NSW is excited by DPIE's ambitions for the precinct.



Figure 1: The proposed masterplan for the Phase 1 town centre (Source: Architectus/Chrofi)

However, it is disappointing that Frenchs Forest 2041 and the associated amendments to the Warringah Development Control Plan 2011 (DCP) contain **very limited proposals for the development of cycling facilities**. This submission addresses these shortcomings and make recommendations for the final Place Strategy and DCP.

We have reviewed the draft Frenchs Forest Place Strategy alongside other relevant plans that relate to the Frenchs Forest area to identify the possible opportunities for improving the active transport network. These plans include:

Transport for NSW Future Transport 2056 Planⁱⁱⁱ, which commits to providing a regional cycle network in Greater Sydney, known as the Principal Bicycle Network (PBN). A coordinated delivery of bike lanes across Greater Sydney will ensure that routes across council boundaries align and create the most direct path of travel. Separated bicycle paths along Wakehurst Parkway and Warringah Road will form key regional routes that serve the Frenchs Forest Precinct.

Greater Sydney Region Plan, A Metropolis of Three Cities (2018)^{iv} which contains 10 directions to create a city where all residents live within 30 minutes of a metropolitan or strategic centre. Increased liveability will be delivered by focusing on walkability, with a network of green corridors for active transport. The plan locates the Northern Beaches in the Eastern Harbour City and identifies Frenchs Forest as a Health and Education Precinct.

North District Plan (2018)^v set outs how integrated land use and transport planning can help achieve the 30-minute city through increasing development density near public transit corridors in Planning Priorities N1 and N12. The need for better accessibility, connectivity and amenity for pedestrian and cyclists is also emphasised in Planning Priorities N3, N4, N19 and N21. In addition to the Health and Education Precinct at Frenchs Forest, strategic centres are identified at Manly, Brookvale, Dee Why and Mona Vale.

Sydney Green Grid^{vi}, developed by the NSW Government Architect in 2017 and reflected in the district and region plans, proposes an interconnecting network of open spaces that support walking and cycling. The Principal Bicycle Network will integrate the Sydney Green Grid to create important links between activity centres and support active recreation. The Frenchs Forest area is covered by the North District documents which highlight key Green Grid opportunities to link Manly Dam to the Frenchs Forest Precinct making use of the Pipeline easement and to develop active transport corridors along Wakehurst Parkway and Warringah Road (Figure 2).



Figure 2: Extract from the Green Grid showing project opportunities in the Frenchs Forest area
(Source: Tyrrell Studio / NSW Government Architect)

Shape 2028 - Northern Beaches Community Strategic Plan^{vii}, establishes the vision and principles to guide Northern Beaches Council to 2028. Community consultation identified 8 key outcomes and 24 related goals that are important to the community and underpin future work. In Goal 17b, under *Transport, Infrastructure and Connectivity*, Council promises to focus on facilitating active and sustainable travel, while ensuring ongoing maintenance and improvements of footpaths and other infrastructure.

Towards 2040 - Northern Beaches Local Strategic Planning Statement^{viii} guides land use planning and the delivery of significant infrastructure for the Northern Beaches to 2040. The LSPS identifies 9 directions and 30 priorities to support the long-term vision of “a stunning coastal and bushland environment, with an enriched and contemporary coastal character and better connections to the North District and the rest of Greater Sydney”.

- Priority 12 seeks an inclusive, healthy, safe and socially connected community, with walkable neighbourhoods to support active living.
- Priority 20 promises sustainable local transport networks so that residents will have the choice to live without a car anywhere in the LGA in 2040. Safe cycling routes separated from vehicle traffic within 5 km of strategic centres will be prioritised.
- Priority 21 aims to redesign existing streets to be more efficient, accommodating more people, goods and services in a limited space and creating safer and more attractive public realm. The reallocation of road space to create wider sidewalks, dedicated bus lanes or separated cycleways will reduce conflict and make it easier to walk, cycle or use public transport.
- Priority 23 plans for Frenchs Forest to be a sustainable health and education precinct with a walkable town centre and connections to the broader active and public transport network, including regional cycling routes to Chatswood and Spit Bridge.

Move 2038 - Northern Beaches Transport Strategy^{ix} discusses the challenges and opportunities for transport in the Northern Beaches over the next 20 years. The strategy imagines a future where cars no longer dominate the roads, with walking and cycling becoming the first choice for trips under 8km. A rapid bus service from Dee Why to Chatswood is the public transport priority. *Theme 1: Accessible and Liveable Places* and *Theme 2: Active Travel* outline plans for smart, active travel network improvements (through technology, end of trip facilities and way-finding signage) and expanded footpath and shared path networks to improve connectivity and safety. The completion of missing links is essential and it is recognised that pedestrians and cyclists should be separated. The aim is to double the active travel trips and drive a 30% reduction in journeys by cars. An ambitious target is set to reduce travel to work by car from 59% of trips in 2016 to just 35% by 2036 while walking and cycling commutes will increase from under 5% to 15% (Figure 3).

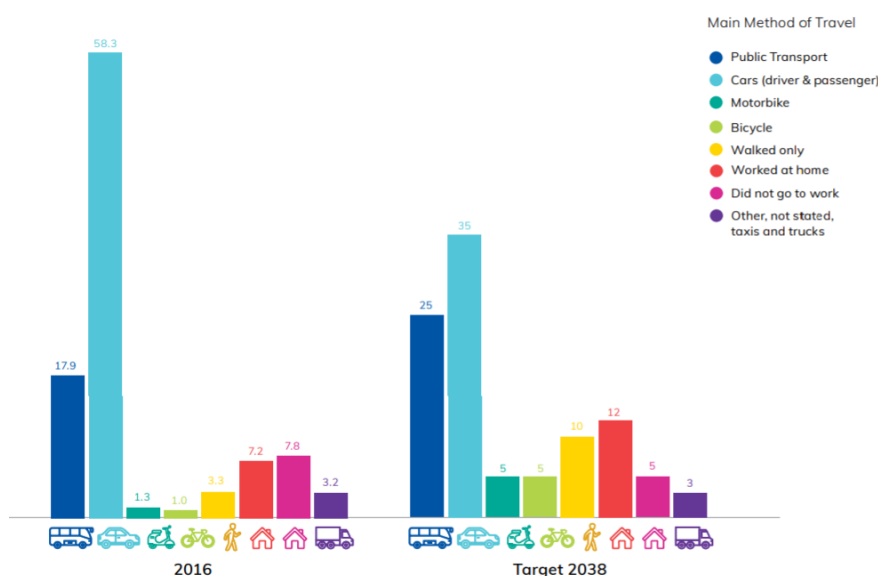


Figure 3: Journeys to work in 2016 and 2036
(Source: Northern Beaches Council)

Northern Beaches Bike Plan 2020^x sets out the directions and actions required to help the community choose cycling as a transport option, create a safer cycling environment and meet the targets established in Move 2038. Cycling is already popular on the Northern Beaches - 40% of residents used a bicycle in the past 12 months compared to the state average of 25% - and the Council is committed to growing cycling.

The Bike Plan proposes separate networks for safe transport cycling and road cycling, end-of-trip facilities and the promotion of cycling. The need for separated cycleways or extra-wide shared paths on regional and district routes and in high use areas is recognised, as is the prioritization of cycleways over driveways and minor road intersections

The proposed Safe Cycling Network includes a three-tier route hierarchy that matches the TfNSW cycling network hierarchy and aligns with the Principle Bicycle Network routes. The three levels consist of regional, district and local routes. The routes around the Frenchs Forest Precinct are shown in Figure 4. The Tier 1 separated path along Warringah Road and the Tier 2 shared path on French Forest Road West are completed.

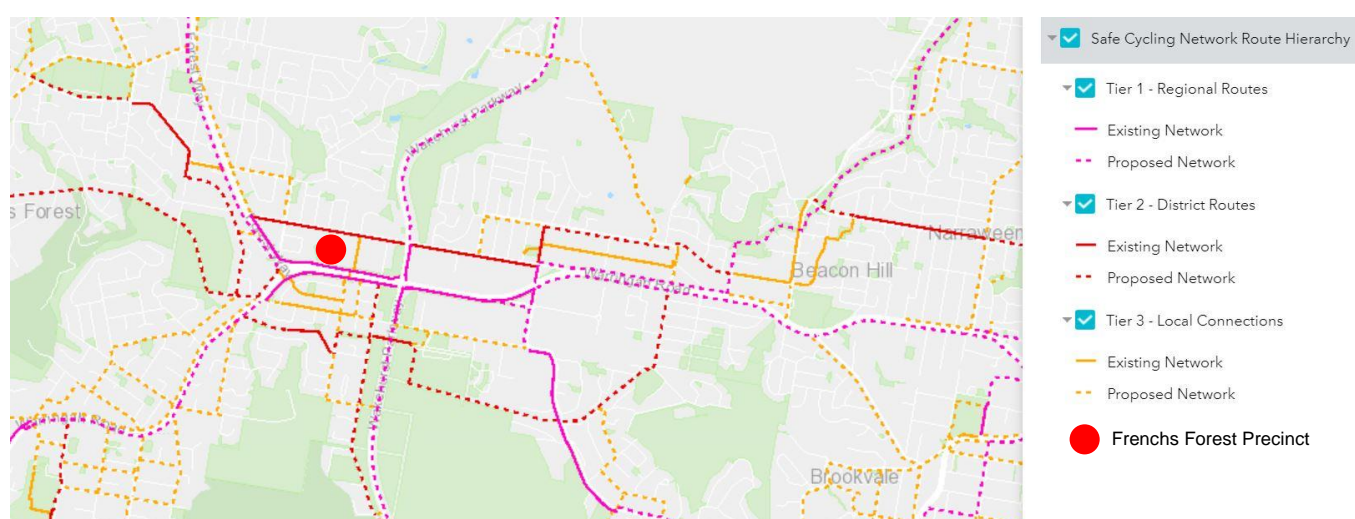


Figure 4: Extract from the Safe Cycling Network showing routes in the Frenchs Forest area
(Source: Northern Beaches Council)

Concerns:

Frenchs Forest 2041 does not align with the excellent ambitions for walking and cycling set out in the recent plans and strategies developed by Northern Beaches Council.

The draft Place Strategy recognises that a 'large' shift from private car use to active and public transport is essential for future sustainability with increase in residents and promises "active links through the precinct and to local open space, bushland areas and national parks, providing convenient pedestrian and cycle connections across major roads into the town centre". However, there are no targets in the strategy for the modal share for active travel and no information about how the network of cycling and walking paths will be incorporated into the precinct.

The associated DCP prepared by Northern Beaches Council to support the Place Strategy was informed by an Urban Design Report^{xi} which identifies obstacles to active transport in area. Frenchs Forest has developed as a car-based suburb with large blocks, neighbourhoods disconnected by major arterial roads and limited walkability. The recent hospital development has created further barriers - a substantial 8-level

car park building separates the hospital entrance from the proposed town centre and Warringah Road was widened to form a 10-lane road with freeway characteristics.

The urban designers deftly negotiate these planning errors to propose fine-grain and permeable streets that support walkability within the precinct and to key local destinations establishes the hierarchy of streets shown in Figure 5.

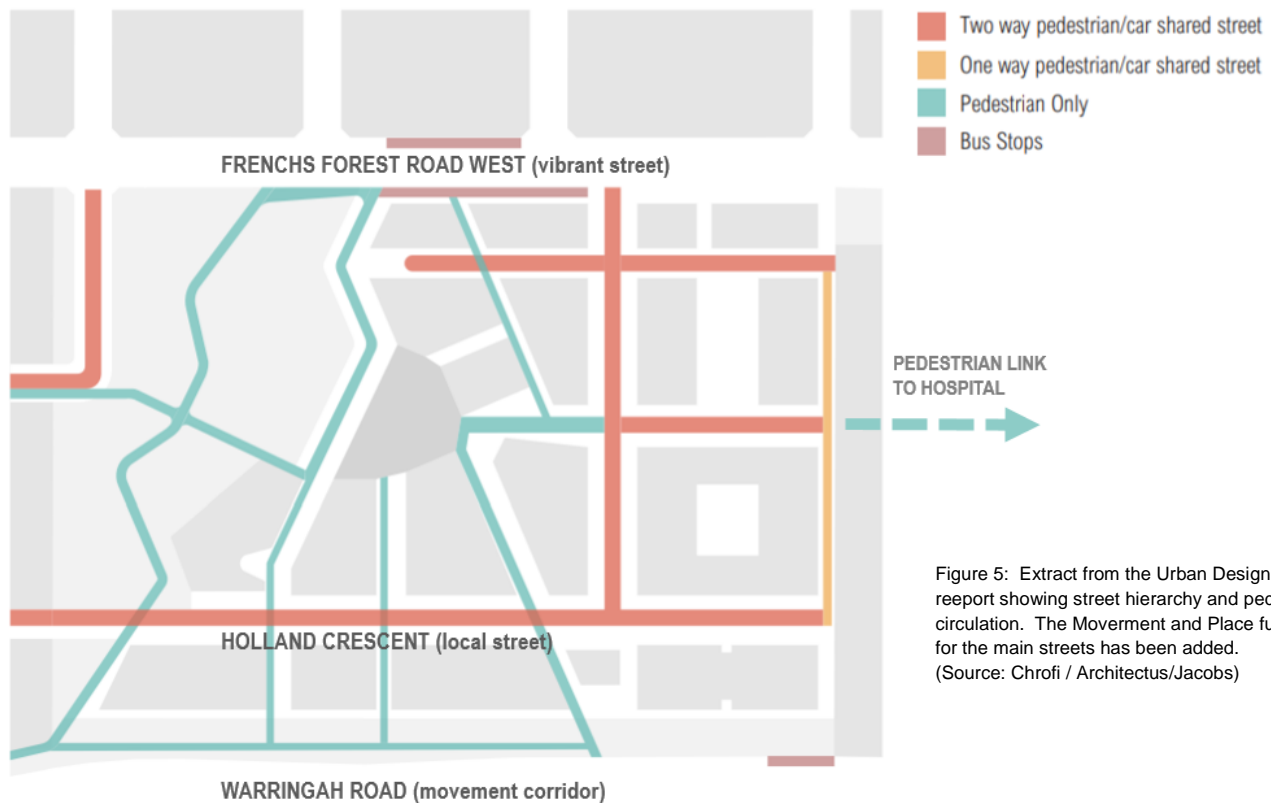


Figure 5: Extract from the Urban Design reeport showing street hierarchy and pedestrian circulation. The Movement and Place function for the main streets has been added. (Source: Chrofi / Architectus/Jacobs)

The network for pedestrians will be excellent. However, the document lacks any details of how cycling will be integrated into the plans. For example, the cross section of Frenchs Forest Road show 6-lanes of traffic with no bike infrastructure, and the Holland Crescent cross section show a standard 4-lane configuration with no space for bike, despite its designation as a shared street (Figure 6).



Figure 6: The proposed cross sections of Frenchs Forest Road West and Holland Crescent, as shown in the draft DCP for Frenchs Forest Town Centre (Source: Chrofi/Architectus/Northern Beaches Council).

A sketch of the proposed Boulevard on Frenchs Forest Road West shows people cycling in mixed traffic. This is not a suitable solution for a Principle Bicycle Network route that is intended to enable safe cycling for transport by people of all ages and abilities. The existing shared path on the southern side of the road is not shown on the cross section or in the artist's impression of the future street (Figure 7). The strategy envisions high levels of pedestrian activity, outdoor dining and street furniture on the Boulevard. We agree that a shared path would create conflict between cyclists and other users of the public realm and a shared treatment is not recommended.



Figure 7: Artist's impressions of the Boulevard on Frenchs Forest Road West. (Source: Chrofi)

A Transport Strategy^{xii} also supports the Place Strategy and contains objectives to provide multiple high-quality transport options and encourage the use of sustainable modes of transport to create a liveable community. However, Section 7 discussing the Active Transport is only one-page long and only shows the existing cycling network with no details of the proposed routes or treatments.

The draft Green Plan^{xiii} is also on exhibition. A network of green links through the town centre that aligns with the DCP is shown. There are no details about how the links will be designed. For the area surrounding the precinct, there is a commitment to complete the continuous cycle route to Manly Dam in the first 10 years. Unfortunately, projects such as a new bridge over Warringah Road, the green links along residential streets and a bridge to complete the Pipeline corridor are only listed as 'initiatives for investigation'.

The proposed Frenchs Forest SIC is expected to provide funding up to \$37.3 million of State and regional infrastructure to support the new residential growth which includes \$10.9 million for active transport and green links. However, this funding will be unlocked very slowly over the 3 phases of the Hospital Precinct Structure Plan and will not be sufficient to develop a truly connected and useful active transport network.

Finally, the various reports refer to a new land bridge connecting the town centre with a future BRT bus stop on Warringah Road, the Karingal Crescent Neighbourhood and the Green Grid Connections to Manly Dam. Figures 8 and 9 show two different visions and locations for this visionary concept. However, the bridge disappears from the draft Place Strategy and the associated DCP prepared by Northern Beaches Council. Some clarity regarding this proposal is needed for the final Place Strategy.

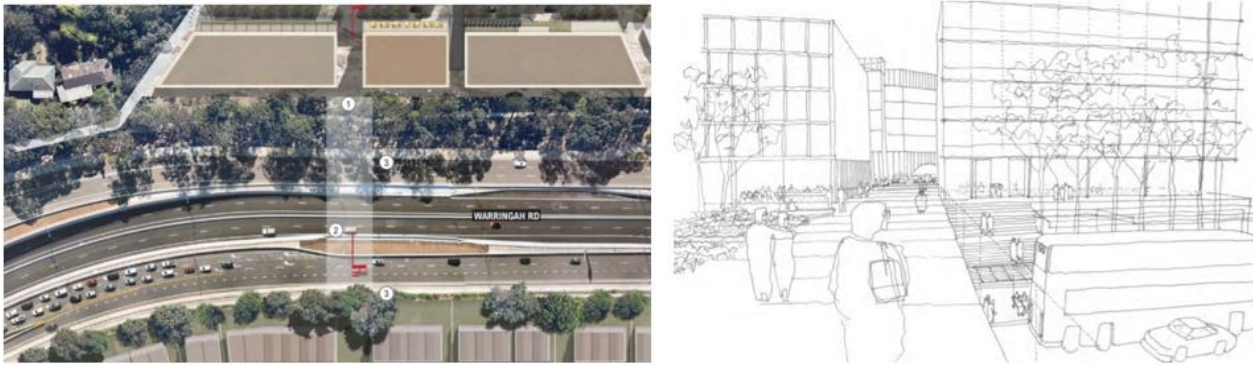


Figure 8: The pedestrian overpass proposed in the Urban Design Report. The bridge could be seamlessly joined into the piazza on grade and include landscaping. (Source: Chrofi/Architectus)

Figure 9: The Platform Park proposed in the draft Green Plan. (Source: Aecom)



Figure 30 Aspirational Concept Plan - Platform Park

Recommendations:

One of the three guiding policy themes at Bicycle NSW is 'Build it for Everyone'^{xiv} and we advocate for safe connected infrastructure that is suitable for riders from 8 to 80 years of age to use independently. It is essential that Northern Beaches Council, DPIE and Transport for NSW develop an adequate network of cycling routes that will allow **all** residents to consider trips by bicycle, reducing noise, pollution and congestion and increasing health and well-being.

1. Allocate road space to prioritise walking cycling and public transport

There has never been a better time to build for bike riding and active transport, as evidenced in the new Transport for NSW policies that require State projects to prioritize road space for active transport:

- Providing for Walking and Cycling in Transport Projects Policy CP21001^{xv}
- Road User Space Allocation Policy CP21000^{xvi}

Priority 21 of Towards 2040, the Northern Beaches LSPS, supports the reallocation of road space to create wider sidewalks, dedicated bus lanes or separated cycleways to reduce conflict and make it easier to walk, cycle or use public transport.

Order of Road User Space Considerations

Figure 10:
Diagram expressing Transport for NSW's
road user priority.
(Source: Transport for NSW)



1. Frenchs Forest Road West requires separated bicycle paths in place of one lane of traffic. Ideally the paths would sit on both sides of the road idea as a uni-directional pair but a bi-directional path on one side may be suitable in the short-to-medium term. Allowing this road to become a 6-lane traffic sewer will make it very difficult to achieve the place ambitions of the Boulevard. The separated path could revert to a shared path along the undeveloped western section of the road where pedestrian activity will be less intense.
2. Town centre roads with two lanes of traffic and two lanes of parking such as Holland Crescent and Main Street should have a bi-directional cycle path in place of one lane of parking. There will be 100,000 sq. m of basement car parking in the town centre and street parking should not be prioritized over active travel.

3. Internal roads designed to be shared by pedestrian and vehicles must have speed limits below 20km/h and very limited vehicle traffic. This will allow cyclists of all ages to safely use the network of roads to access the residential building, community facilities, shops, services and public transport stops.
4. When implementing the green links in residential streets surrounding the precinct, it is important not to lose green space, verges and landscaping when constructing shared paths. As recommended in the draft Green Plan, roads should be narrowed and landscaped verges widened to create space for pedestrians and cyclists. This will help reduce vehicle speeds, to create safer, quieter and more comfortable streets for walking and cycling.

2. Future proof the active transport network

The status quo of walking and cycling activity in the Frenchs Forest area is likely to change rapidly. The density of walkers will increase when new housing and retail is delivered as proposed. An upswing in travel by bikes has occurred recently due to Covid, individual reactions to climate change, a surge in local delivery services and the growing popularity of e-bikes. In addition, State policies to address climate change and urban liveability will add to pressures on councils to secure a much bigger travel share for walking and cycling. It is essential to future proof the cycle network by allowing for increased demand at the outset. Paths should be wide and separated from pedestrians where possible.

It is important to refer to the new Cycleway Design Toolbox^{xvii} to ensure that the paths are constructed to current best practice.

3. Ensure that active transport infrastructure is delivered as a condition of planning consent

Develop the active transport plans from the outset, consult early and make provision of walking and cycling paths a condition of planning consent. Commit to active transport infrastructure delivery as early as possible in the project in order to encourage mode-shift when people move to the precinct and keep riders and walkers safely separated from heavy vehicles. This will relieve pressure on the roads both during and after construction. Despite the changing legislation around Special Infrastructure Contributions, we recommend that developer contributions go directly to Northern Beaches Council to ensure the funds are spent in the precinct.

4. Provide segregated infrastructure rather than shared paths in most locations

Our preferred infrastructure is always completely separated paths that cater for all riders of all ages and abilities. According to the best practice 'cycling segmentation' model, developed in Portland USA to identify the type and needs of existing and potential bike riders^{xviii}, such cycle paths will allow 70% of local residents to consider journeys by bike (Figure 11).

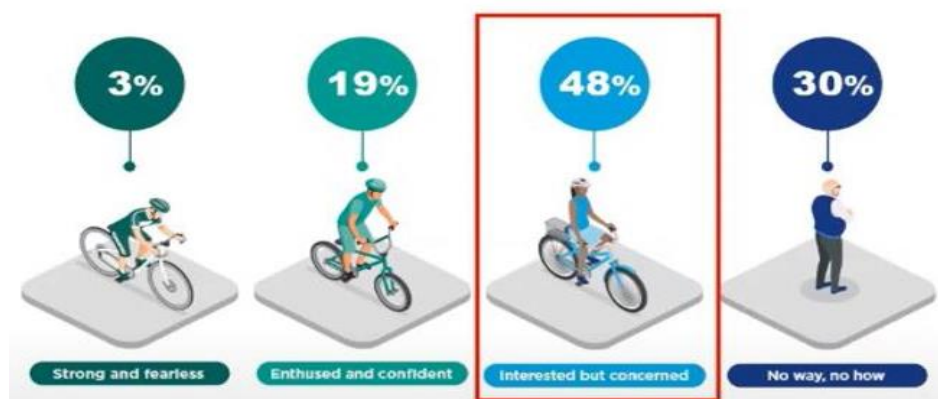


Figure 11:
Four general categories of comfort levels
for cycling as transportation.
Source: North Sydney Council

The provision of properly segregated infrastructure on key commuter routes with space to accommodate future demand must be a key policy position of Northern Beaches Council and DPIE. Shared paths are not suitable for areas with high pedestrian and cycling activity and will not lead to an acceptable level of amenity and safety for either walkers or riders with conflict occurring between different users. Door zone bike lanes, bike stencils on the road and dangerous intersections will continue to deter the 48%^{xix} of people who are 'interested but concerned', from making the switch to cycling, and parents will still feel driving their children to school and activities is the only way to keep them safe from being hit by cars. Any small increase in inconvenience to car drivers created by reducing road space for driving and parking private vehicles will incentivise the mode-shift that Transport for NSW and Northern Beaches Council seek, benefitting local residents with quieter streets, and less pollution, noise and through-traffic.

5. Reduce speed limits to 30km/h on any local streets with on-road cycle routes

30km/h has been shown as an optimal speed limit to allow people driving and cycling to share the road safely^{xx} and is becoming a standard speed limit in many parts of the world. All single lane roads in Spain have been under a 30km/h limit since May 2021 and 30% of UK residents live in 20mph areas^{xxi}.

Lower speed limits are an important building block for Vision Zero, an approach to road safety that was launched in Sweden in 1994 with the simple premise that no loss of life is acceptable. The Vision Zero approach has been highly successful and has spread to many other countries. The key policies include prioritizing low urban speed limits, pedestrian zones, physical separation between bicycle and car traffic, data-based traffic enforcement and behaviour-change education^{xxii}.

6. Maintain a focus on the important details of the cycle network

It is the **detailed design** of cycle routes, end of trip facilities and wayfinding that will encourage the uptake of cycling and reduce dependence on private vehicles.

It is essential to ensure that popular daily destinations such as shops, schools and bus stops are easy to reach by bicycle for all residents of all ages and abilities. In particular, safe connections with all education facilities along the routes must be incorporated. Cycling infrastructure needs to be safe and continuous to increase the mode share of cycling and reduce congestion associated with school journeys.

Integration of the routes with bus stops is essential to ensure easy access by bike and foot. All public transport journeys start and finish with a walk or cycle. By providing high-quality, safe conditions for walking to the station, residents will be encouraged to use mass transit. If safe cycling is facilitated, the catchment for the bus stop increases, breaking down the first/last mile barrier which can inhibit take-up of public transport.

Parking and other end-of-trip facilities should be provided at journey end locations to further support riders and encourage participation. Note that the DCP only requires end-of-trip facilities must be provided for buildings which do not comprise any residential uses. This must be changed to ensure provision for all building with commercial uses – which will exclude few buildings in a mixed-use precinct.

Wayfinding supports visitors to vibrant centres by clearly articulating and communicating the most efficient and safest route. Signage style for wayfinding should be consistent throughout Frenchs Forest, the Northern Beaches and beyond.

The Northern Beaches Bike Plan and Move 2038, the Northern Beaches Transport Strategy, clarify how these principles should be applied at Frenchs Forest.

Conclusion:

Bicycle NSW supports the game-changing upgrades to the active transport network made possible by the redevelopment of the Frenchs Forest Precinct. Now is the time to develop an inspirational vision for allocating road space and integrating transport modes based on desired future outcomes. Safe infrastructure to support walking and cycling will benefit everyone in the community, reducing congestion and pollution while improving public health and providing more equitable access to employment, services and public transport.

Cycle paths offer the greatest mode-shift potential when riders are able to complete a whole journey safely. The City of Parramatta and City of Sydney have demonstrated that building safe, well-connected cycleways works to induce mode-shift to active transport. Similar vision is required for Frenchs Forest to achieve the ambition increase in active travel and decrease in car trips set out in Move 2038.

This submission has also been sent to Northern Beaches Council.

We look forward to working with DPIE and Northern Beaches Council to progress the delivery of bicycle infrastructure in the area.

Yours faithfully,

Sarah Bickford

Bike Planner
Bicycle NSW

ⁱ This was reduced to 4,360 in the NB Council Local Housing Strategy, adopted in April 2021.
<https://eservices.northernbeaches.nsw.gov.au/ePlanning/live/Common/Output/Document.aspx?t=webdoc&id=PIDEAanAopIV0A60ki4OEg==>

ⁱⁱ DPIE. 2021. Draft Frenchs Forest 2041 Place Strategy. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Frenchs+Forest+2041+Draft+Place+Strategy.pdf

ⁱⁱⁱ NSW Government, Future Transport 2056 [Online 1/4/2020] <https://future.transport.nsw.gov.au/plans/future-transport-strategy/future-transport-greater-sydney>, Points 3-5

^{iv} Greater Sydney Commission, A Metropolis of Three Cities, 2018. <https://www.greater.sydney/metropolis-of-three-cities>

^v Greater Sydney Commission, North District Plan, 2018. <https://www.greater.sydney/north-district-plan>

^{vi} Sydney Green Grid, North District. Tyrrell Studio, 2017.

<https://www.governmentarchitect.nsw.gov.au/resources/ga/media/files/ga/plans/sydney-green-grid-plan-6-north-district-2017.pdf>

^v Northern Beaches Community Strategic Plan – Shape 2028.

<https://www.northernbeaches.nsw.gov.au/sites/default/files/shape-2028-community-strategic-plan.pdf>

^{viii} Northern Beaches LSPS - Towards 2040. 2020, April.

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/policies-register/planning-strategies/local-strategic-planning-statement-lsps/lsp-towards-2040.pdf>

^{ix} Northern Beaches Council. 2018. Move – Northern Beaches Transport Strategy 2038.

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/policies-register/transport/transport-strategy/transportstrategy.pdf>

^x Northern Beaches Bike Plan. 2020, July. https://yoursay.northernbeaches.nsw.gov.au/download_file/3194/2346

^{xi} Architectus/Chrofi. 2020, July. Frenchs Forest Precinct urban design report and public domain strategy. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Urban+Design+Report.PDF

^{xii} Jacobs. 2020, December. Frenchs Forest Planned Precinct transport strategy. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Frenchs+Forest+Transport+Strategy.PDF

^{xiii} Aecom. 2020, December. Frenchs Forest draft Green Plan. https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Draft+Green+Plan.PDF

^{xiv} Bicycle NSW, Policy Framework. [Online as at 19/7/2021] <https://bicyclensw.org.au/our-policy/>

^{xv} NSW Government, Providing for Walking and Cycling in Transport Projects Policy CP21001, [Online as at 19/2/2021] www.transport.nsw.gov.au/system/files/media/documents/2021/providing-for-walking-and-cycling-in-transport-projects-policy.pdf

^{xvi} NSW Government, Road User Space Allocation Policy CP21000, [Online as at 19/2/2021] www.transport.nsw.gov.au/system/files/media/documents/2021/road-user-space-allocation-policy.pdf

^{xvii} Cycleway Design Toolbox: designing for cycling and micromobility. Transport for NSW. <https://www.transport.nsw.gov.au/system/files/media/documents/2021/Cycleway-Design-Toolbox-Web.pdf>

^{xviii} Roger Geller. (2009). Four types of cyclists. Portland Bureau of Transportation. <https://www.portlandoregon.gov/transportation/article/264746>

^{xix} 70% of people when surveyed said they would ride more if they felt safe, NSW Government, Sydney's Cycling Future (2013) [Online as at 24/2/2021] <https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/sydneys-cycling-future-web.pdf>

^{xx} City of Yarra - 30km/h speed limit: pre-trial final report, 2017. <https://thanksfor30.com.au/sites/default/files/2018-08/City-of-Yarra-Pre-Trial-Report-Aug-2017-FINAL%5B1%5D.pdf>

^{xxi} O'Sullivan, F. (2020, November). Why Europe is slowing down. Bloomberg CityLab. <https://www.bloomberg.com/news/articles/2020-11-18/speed-limits-are-dropping-in-europe-and-the-u-k>

^{xxii} Vision Zero Network. (2015, April 13). European Cities Lead the Way Toward Vision Zero. <https://visionzeronetwork.org/european-cities-lead-the-way-toward-vision-zero/>