

SummitCare Randwick:

Compliance with Clause 26 of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004



29 June, 2020

**This report has been prepared for
SummitCare**

By



The Old Post Office
231 Princes Hwy, Bulli NSW 2516

Ph: 02 4283 7300
info@judithstubbs.com.au
www.judithstubbs.com.au

This Report has been prepared by:

Dr Judith Stubbs BSW, PhD

John Storer, BE (Civil), Grad Dip (Econ)

Disclaimer

© Judith Stubbs & Associates

All Rights Reserved. No part of this document may be reproduced, transmitted, stored in a retrieval system, or translated into any language in any form by any means without the written permission of Judith Stubbs & Associates.

Intellectual Property Rights

All Rights Reserved. All methods, processes, commercial proposals and other contents described in this document are the confidential intellectual property of Judith Stubbs & Associates and may not be used or disclosed to any party without the written permission of Judith Stubbs & Associates.

Table of Contents

1	Introduction.....	2
1.1	Scope	2
1.2	Introduction	2
2	Assessment of Access Pathways.....	5
2.1	Introduction	5
2.2	Methodology	5
2.3	Access to Bus Stops in Frenchmans Road	5
2.4	Access to shops in Frenchmans Road.....	12
2.5	Access to services and facilities in Randwick CBD from bus stops in Belmore Road Randwick.	13
3	Conclusion and Recommendations	18
3.1	Conclusion	18
3.2	Recommendations	20

Figures

Figure 1.1:	General location of the proposed development	4
Figure 2.1:	Bus Route 314 Bondi Junction to Coogee via Randwick Junction	6
Figure 2.2:	Bus Route 314 Coogee to Bondi Junction via Randwick Junction	6
Figure 2.3:	Footpath and return bus stop, north side of Frenchmans Road.	7
Figure 2.4:	Footpath, north side of Frenchmans Road.	8
Figure 2.5:	Pedestrian Crossing at Frenchmans Road and Randwick bound bus stop showing non complying kerb ramp.	9
Figure 2.6:	Pedestrian Crossing Frenchmans Road showing non complying kerb ramp.	10
Figure 2.7:	Frenchmans Road shops.	13
Figure 2.8:	Bus Route 314 Bondi Junction to Coogee via Randwick Junction	14
Figure 2.9:	Bus Route 314 Coogee to Bondi Junction via Randwick Junction	14
Figure 2.10:	Randwick CBD shopping strip.	15
Figure 2.11:	Alison Park.	16

Tables

Table 3.1:	Accessibility of Services and Facilities	19
------------	--	----

1 Introduction

1.1 Scope

This report assesses the compliance of a proposed seniors housing development at 11-19 Frenchmans Road, Randwick NSW with Clause 26 “Location and access to facilities” of *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (the SEPP). Where the development does not comply, recommendations are provided to achieve compliance.

1.2 Introduction

The proposal is for the redevelopment of an existing 94 bed residential aged care facility (RACF), SummitCare Randwick ‘Frenchmans Lodge’, with a new and expanded facility over four levels (two basement, ground floor and second floor) containing an 86 bed RACF (70 single bed rooms, 8 twin bed rooms) and 2 one-bedroom independent living units, basement parking, hairdresser/spa, gym, theatre, kitchen, staff room, café, multi-purpose room, dining area, outdoor balconies, reception and administration areas.

Clause 26 of the SEPP is set out below.

26 Location and access to facilities

(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the proposed development will have access that complies with subclause (2) to—

(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and

(b) community services and recreation facilities, and

(c) the practice of a general medical practitioner.

(2) Access complies with this clause if—

(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable—

(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,

(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,

(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time, or

(b) in the case of a proposed development on land in a local government area within the Greater Sydney (Greater Capital City Statistical Area)—there is a public transport service available to the residents who will occupy the proposed development—

(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and

(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and

(iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive),

and the gradient along the pathway from the site to the public transport services (and from the public transport services to the facilities and services referred to in subclause (1)) complies with subclause (3), or ...

(3) For the purposes of subclause (2) (b) and (c), the overall average gradient along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable—

(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,

(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,

(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time.

(4) For the purposes of subclause (2)—

(a) a **suitable access pathway** is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and

(b) distances that are specified for the purposes of that subclause are to be measured by reference to the length of any such pathway.

(5) In this clause—

bank service provider means any bank, credit union or building society or any post office that provides banking services.

The general location of the proposed facility is shown on the figure below.

An extensive range of services and facilities are available in Randwick CBD, about 1 km distant by road.

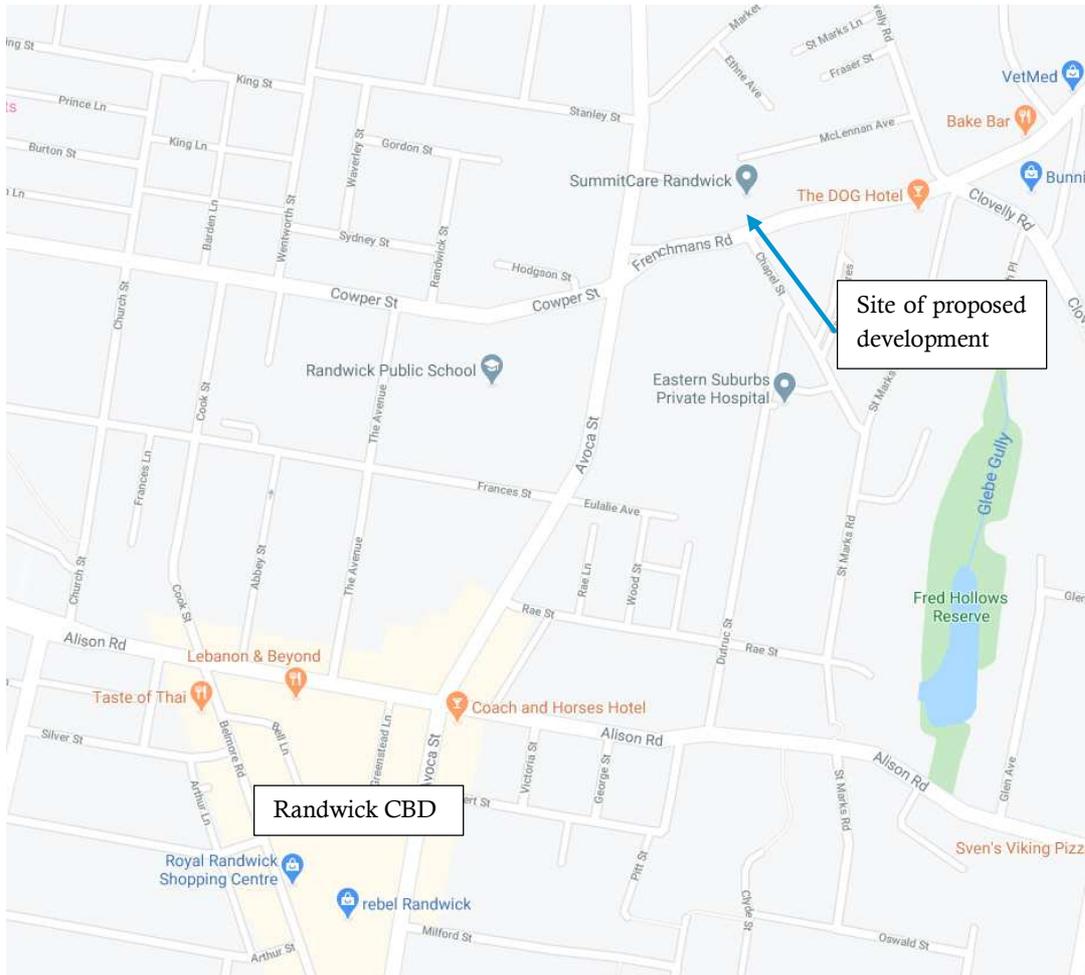


Figure 1.1: General location of the proposed development

Source: Google Maps, JSA 2020

2 Assessment of Access Pathways

2.1 Introduction

The following access pathways and services have been assessed for compliance with Clause 26 of the SEPP:

Access to bus services in Frenchmans Road;

Access to shops in Frenchmans Road, east of the site; and

Access to services and facilities in Randwick CBD from bus stops in Belmore Road.

2.2 Methodology

Distances were measured using a Bosch Professional GWM 32 measuring wheel and gradients were assessed using a Bosch DNM 60 L Professional electronic spirit level. The spirit level was calibrated immediately prior to the site visit. Gradients were assessed by taking spot measurements along paths and at kerb ramps, road crossings and access ramps.

2.3 Access to Bus Stops in Frenchmans Road

Bus stops in Frenchmans Road provide access to Randwick CBD via services 314, 316 and 317.

For the purposes of compliance with Clause 26, bus service 314 has been assessed. The bus route is shown in the figures below. The service to Randwick CBD leaves from the west bound bus stop in Frenchmans Road (ID 2031130) and travels to Randwick CBD. The service from Randwick CBD drops off at the east bound bus stop in Frenchmans Road (ID203157).

Service 314 operates twice hourly throughout the day and offers a disabled service. It complies with Clause 26(2)(b)(iii) of the SEPP, e.g. there is a weekday service to Randwick CBD at 9.31 and 14.27, with a return service from Randwick CBD at 11.32 and 16.59.¹

¹ Service information posted at Bus Stop.

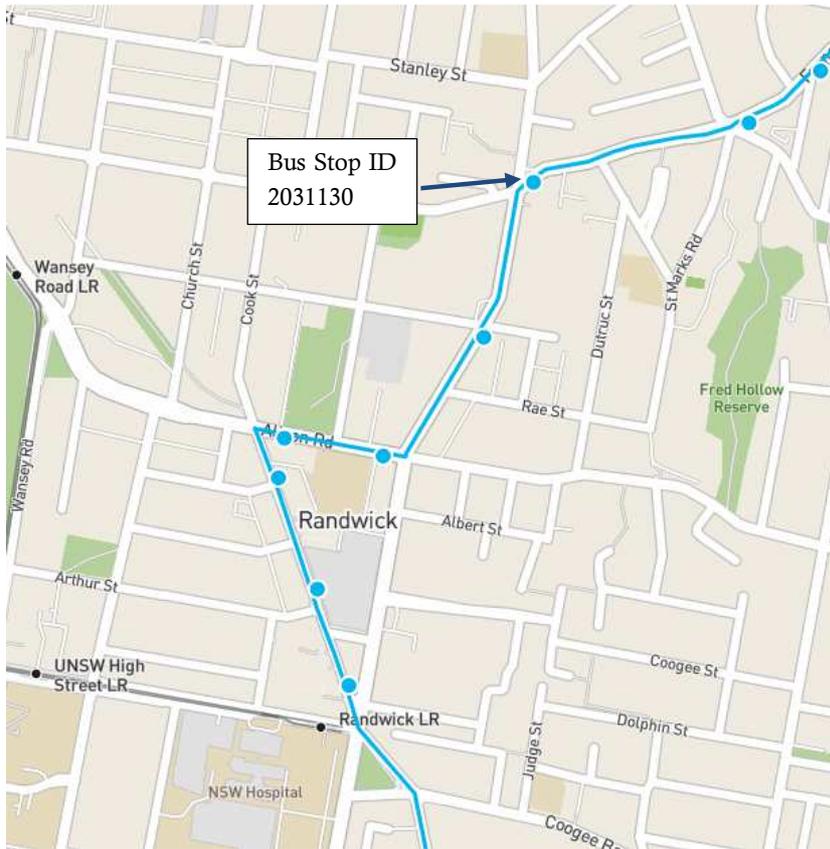


Figure 2.1: Bus Route 314 Bondi Junction to Coogee via Randwick Junction

Source: Transport NSW

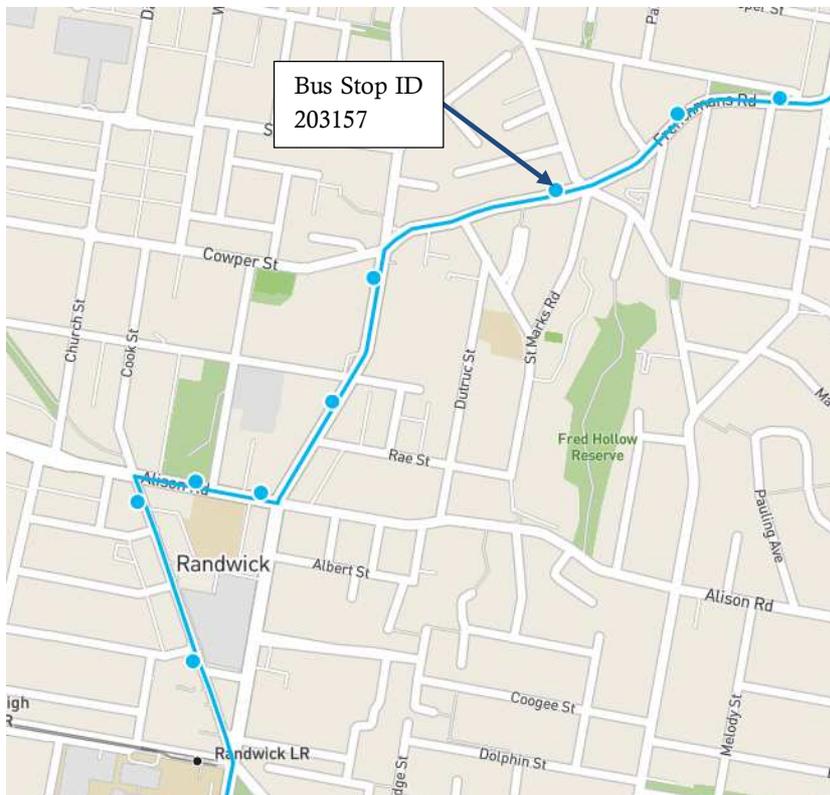


Figure 2.2: Bus Route 314 Coogee to Bondi Junction via Randwick Junction

Source: Transport NSW

The Randwick bound bus stop is accessed via a concrete footpath on the north side of Frenchmans Road and a marked pedestrian crossing and signalised pedestrian crossing of Frenchmans Road and the return bus stop is accessed via a concrete footpath on the north side of Frenchmans Road.



Figure 2.3: Footpath and return bus stop, north side of Frenchmans Road.

Source: JSA 2020



Figure 2.4: Footpath, north side of Frenchmans Road.

Source: JSA 2020



Figure 2.5: Pedestrian Crossing at Frenchmans Road and Randwick bound bus stop showing non complying kerb ramp.

Source: JSA 2020



Figure 2.6: Pedestrian Crossing Frenchmans Road showing non complying kerb ramp.

Source: Google Maps

The Randwick bound bus stop was measured at 173 metres from the entrance to the site, and the return bus stop was measured at 140 metres, so the distances comply with clause 26(2)(b)(i) of the SEPP.

Gradients along the path generally complied with the requirements of clause 26(2)(a) and 26(3), however two of the pedestrian ramps at the crossing of Frenchmans Road did not comply. These were on the north side of the pedestrian island in Frenchmans Road, and the southern ramp on Frenchmans Road. These ramps do not comply, with the first ramp having a grade of 1:7 for a distance of 1.4 metres, and the second ramp having a grade of 1:5 for a distance of 1.0 metres compared to the requirement for a grade of no more than 1:10 for a maximum of 5.0 metres and a grade of no more than 1:8 for a maximum of 1.5 metres.

There are two options to address this:

- Reconstruct the kerb ramps to a gradient of 1:8 over a distance of 1.5 metres;
- Rely on Bondi Junction to provide services,² which uses the same bus stops, but with an alternative bus stop in Frenchmans Road east of Clovelly Road. Access to this bus stop will require modification of a non-complying kerb ramp at Clovelly Road with a gradient of 1:5 for a distance of 1.4 metres, and a wide section of path to the west of the ramp with a gradient of 1:11.2 – 9.8 over a distance of 10.1 metres, noting that a complying gradient may be achieved by addressing the path as a series of switchbacks.

² An access assessment has not been carried out for Bondi Junction

this report relies on services and facilities in Randwick CBD, and that rectification of ramps at the crossing of Frenchmans Road near Avoca Street will be required for compliance with clause 26 of the SEPP.

Recommendation 1: Provide complying ramps at the crossing of Frenchmans Road near Avoca Street.

2.4 Access to shops in Frenchmans Road

A narrow range of services are available in shops in Frenchmans Road within 400 metres of the proposed site. These include:

- Coles Express (providing daily needs) (138 metres);

After crossing Clovelly Road:

- Restaurant (244 metres);
- Pharmacy (260 metres); and
- Butchers (306 metres).

After crossing Roscrea Avenue:

- Veterinary (362 metres); and
- Medical Centre (400 metres).

After crossing Frenchmans Road at Clovelly Road:

- Hairdresser (255 metres);
- Dentist (262 metres);
- Hardware store (298 metres); and
- Food Store (selling groceries, fruit and vegetables) (333 metres).

No accessible banks or community services were identified, so that the shops do not meet the requirements of clause 26 (1) of the SEPP.



Figure 2.7: Frenchmans Road shops.

Source: JSA 2020

There are a number of non-compliances with clause 26(2)(a) including:

- A non-complying kerb ramp at Clovelly Road with a gradient of 1:5 for a distance of 1.4 metres, and a wide section of path to the west of the ramp with a gradient of 1:11.2 – 9.8 over a distance of 10.1 metres, noting that a complying gradient may be achieved by addressing the path as a series of switchbacks; and
- A non-complying kerb ramp at Roscrea Avenue with a gradient of 1:8 for a distance of 2.1 metres.

Because of the narrow range of services and the non-compliances with clause 26(2)(a), this report relies on Randwick CBD to meet the requirements of clause 26.

2.5 Access to services and facilities in Randwick CBD from bus stops in Belmore Road Randwick.

Access was assessed from bus stop ID 2170556 in Belmore Road to services in Belmore Road and Alison road, including Royal Randwick Shopping Centre, and to return bus stop ID 203136. The bus stops and various streets are shown in the figures below.

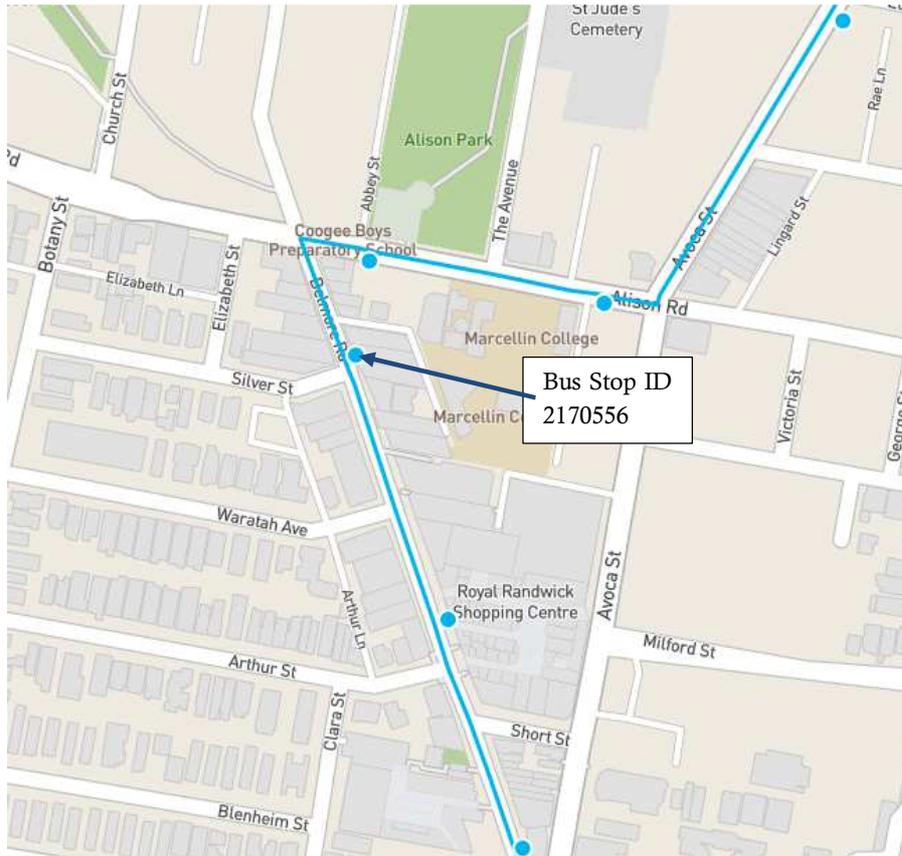


Figure 2.8: Bus Route 314 Bondi Junction to Coogee via Randwick Junction

Source: Transport NSW

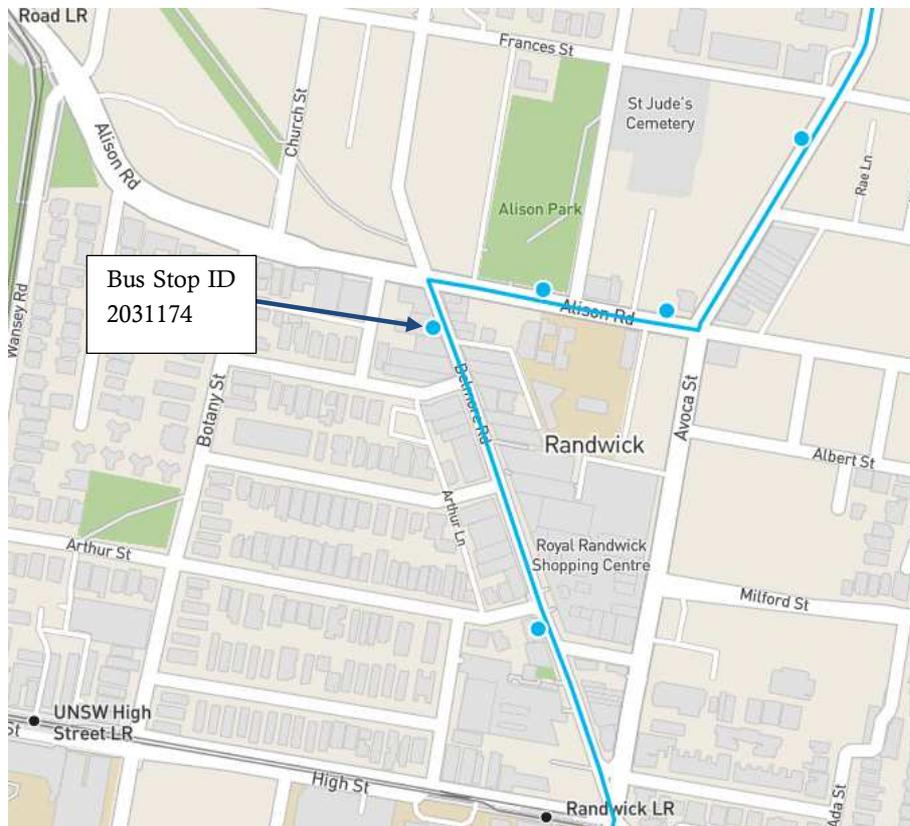


Figure 2.9: Bus Route 314 Coogee to Bondi Junction via Randwick Junction

Source: Transport NSW

A range of services are available along Belmore Road from Bus Stop ID 2170556. On the east side heading south, these include:

- Westpac Bank (59 metres);
- Pharmacy (81 metres);
- Post Box (43 metres); and
- Royal Randwick Shopping Centre (182 metres).

The pathway complies with clause 26(3) of the SEPP.

Within Royal Randwick Shopping Centre, relevant services include:

- Woolworths Metro, bakers and fish shop (220 metres);
- Delicatessen (236 metres);
- Hair dresser (250 metres);
- Library (on second floor via lift) (267 metres);
- Post Office (on second floor via lift and ramp) (340 metres); and
- Medical Centre (on second floor via lift and ramp) (349 metres).



Figure 2.10: Randwick CBD shopping strip.

Source: Google Maps

The access ramp to Royal Randwick Shopping Centre has a grade of 1:8.8 over a distance of 3.0 metres, however due to the width of the ramp it is possible to achieve a complying grade of less than 1:10 over a distance of less than 5 metres, accepting a small component of cross fall.

The second floor ramp access to the Post Office and Medical Centre does not comply, with the lower stage of the ramp having a gradient of 1:10.3 over a distance of 7.6 metres.

On the west side of Belmore Road heading south, (accessed using the signalised pedestrian crossing at Alison Road) services include:

- Bus Stop ID 2031174 (127 metres);

After crossing Silver Street (172 metres):

- Restaurants (between 130 and 200 metres);
- Barber (213 metres);
- St George Bank (222 metres);

After crossing Waratah Avenue:

- Randwick Doctors Medical Centre (293 metres);
- Pharmacy (297 metres);
- Commonwealth Bank (348 metres); and
- Butcher (368 metres).

Gradients along this route generally comply with Clause 26(3), noting that steeper ramps at Waratah Avenue can be taken at an angle to achieve compliance due to their width, accepting a small component of cross fall.

Additional services are available heading north along Belmore Road and along Alison Road and Avoca Street. These include:

- Newsagent (selling stamps) (8 metres);
- Coach and Horses Hotel (crossing Avoca Street) (335 metres); and
- Alison Park (crossing Alison Road) (187 metres).



Figure 2.11: Alison Park.

Source: JSA 2020

Gradients along the route generally comply with the SEPP. Steeper ramps crossing Alison Avenue at Belmore Road can be taken at an angle to achieve compliance due to their width, accepting a small component of cross fall. One of the pedestrian ramps on the small lane adjacent to Alison Park is not compliant, with one ramp having a gradient of 1:5.4 over 1.4 metres. This could be rectified through construction of a traffic calming device, removing the need for ramps.

Distances from the services and facilities listed above to the return bus stop are less than 400 metres.

Recommendation 2: Provide complying ramps at the crossing of the lane to the west of, and adjacent to, Alison Park at the intersection with Alison Road.

3 Conclusion and Recommendations

3.1 Conclusion

Clause 26(1) of the SEPP requires access to:

- (a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and
- (b) community services and recreation facilities, and
- (c) the practice of a general medical practitioner.

Complying access to shops, bank service providers and other retail and commercial services is available at Randwick CBD, **subject** to construction of a complying access pathway between the site and bus stop ID 2031130.

Complying access to community services and recreation facilities is available at bus stops in Frenchmans Road, and in Randwick CBD **subject** to construction of a complying access pathway between the site and bus stop 2031130 and between bus stop ID 2170556 and Alison Park.

Complying access to the practice of a general medical practitioner is available in Randwick CBD.

Greater detail is shown in the table below.

Table 3.1: Accessibility of Services and Facilities

Group	Details	Location	Walking Distance	
Shops, bank service providers and other retail and commercial services	Westpac Bank	Belmore Road	59 metres	
	Pharmacy	Belmore Road	81 metres	
	Woolworths Metro supermarket	Royal Randwick Shopping Centre	220 metres	
	Baker	Royal Randwick Shopping Centre	220 metres	
	Fish Shop	Royal Randwick Shopping Centre	220 metres	
	Delicatessen	Royal Randwick Shopping Centre	236 metres	
	Hairdresser	Royal Randwick Shopping Centre	250 metres	
	Restaurants	Belmore Road	130-200 metres	
	Barber	Belmore Road	213 metres	
	Butcher	Belmore Road	368 metres	
	Newsagent	Belmore Road	368 metres	
Community services and recreation facilities	Public Transport	Bus Stops ID 2031130 and 203157 (to and from Randwick CBD), Frenchmans Road	173 metres and 140 metres	
	Alison Park	Alison Road	187 metres	
	Randwick Library	Royal Randwick Shopping Centre	267 metres	
	Postal Services		Stamps available at newsagent in Belmore Road	8 metres
			Post box in Belmore Road	43 metres
	Hotel	Avoca Street	335 metres	
The practice of a general medical practitioner	Randwick Doctors Medical Centre	Belmore Road	293 metres	

Source: JSA 2020

3.2 Recommendations

Recommendation 1: Provide complying ramps at the crossing of Frenchmans Road near Avoca Street.

Recommendation 2: Provide complying ramps at the crossing of the lane to the west of, and adjacent to, Alison Park at the intersection with Alison Road.