

SummitCare Casula:

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



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This report has been prepared for
SummitCare

By

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1 Introduction

1.1 Scope

This report assesses the compliance of a proposed seniors housing development at Kurrajong Road, Casula 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 ensure compliance.

1.2 Introduction

The proposed development is for the construction of a 142 bed multi storey residential aged care facility with basement parking, hairdresser, café, consulting rooms, dining area, reception and administration area and 93 one, two and three bedroom multi storey seniors living apartments including four ground floor retail shops.

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 figures below.

The site is adjacent to Daruk Park, with nearby services and facilities including Casula Mall, bus services to and from Liverpool CBD from stops near Casula Mall, and Casula Library and Community Hall. An extensive range of services and facilities are available in Liverpool CBD, about 5 km distant by road.

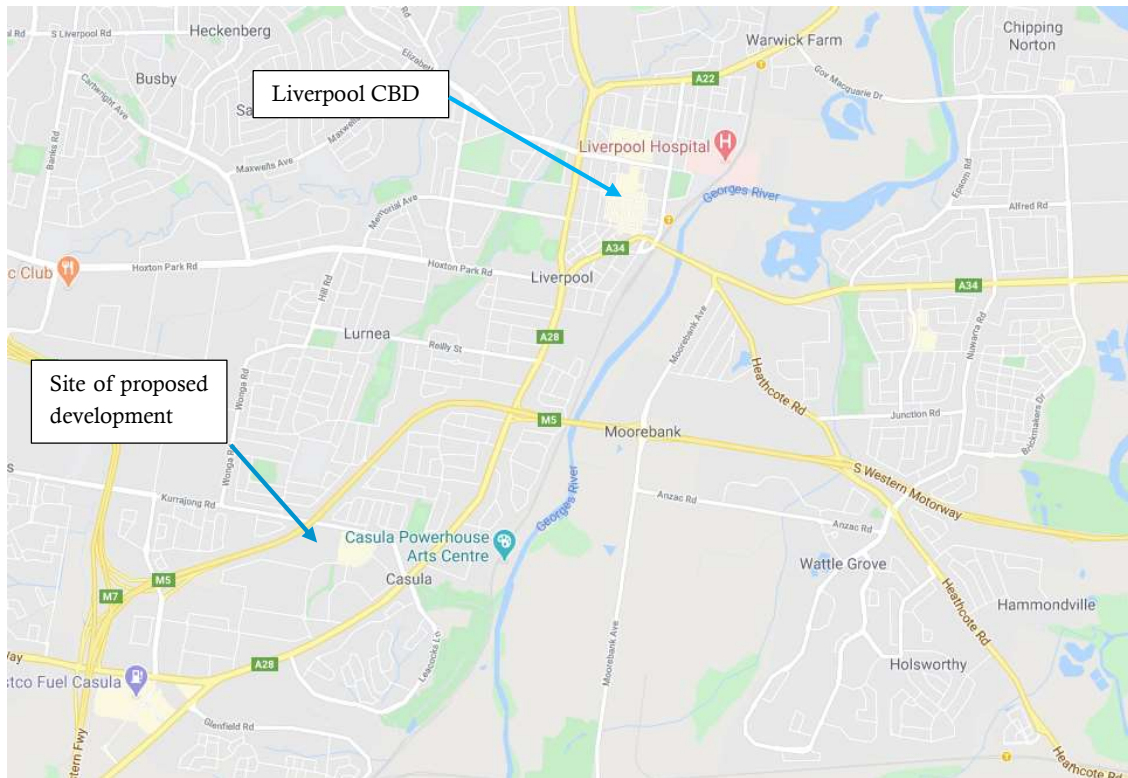


Figure 1.1: General location of the proposed development

Source: Google Maps, JSA 2020



Figure 1.2: 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 Kurrajong Road, adjacent to Casula Mall;

Access to Casula Mall;

Access to Daruk Park, Casula Library and Casula Community Hall; and

Access to services and facilities in Liverpool CBD from bus stops in Elizabeth Street and Moore Street, Liverpool.

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 Kurrajong Road

Bus stops in Kurrajong Road provide access to Liverpool CBD and Liverpool Railway Station via services 851, 852, 865 and 866.

For the purposes of compliance with Clause 26, bus service 851 has been assessed. The bus route is shown in the figures below. The service to Liverpool leaves from the east bound bus stop in Kurrajong Road (ID 2170388) and travels to Liverpool CBD with services operating along either Elizabeth Street or Moore Street. The service from Liverpool operates along Moore Street with drop off at the west bound bus stop in Kurrajong Road (ID2170400).

Service 851 operates 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 Westfield Liverpool (Elizabeth Street) at 9.31 and 14.27, with a return service from Liverpool interchange at 10.00 and 16.15.¹

¹ <https://transportnsw.info/documents/timetables/11-851-Carnes-Hill-Marketplace-to-Liverpool-via-Cowpasture-Rd-20200128.pdf> accessed 8 February 2020.

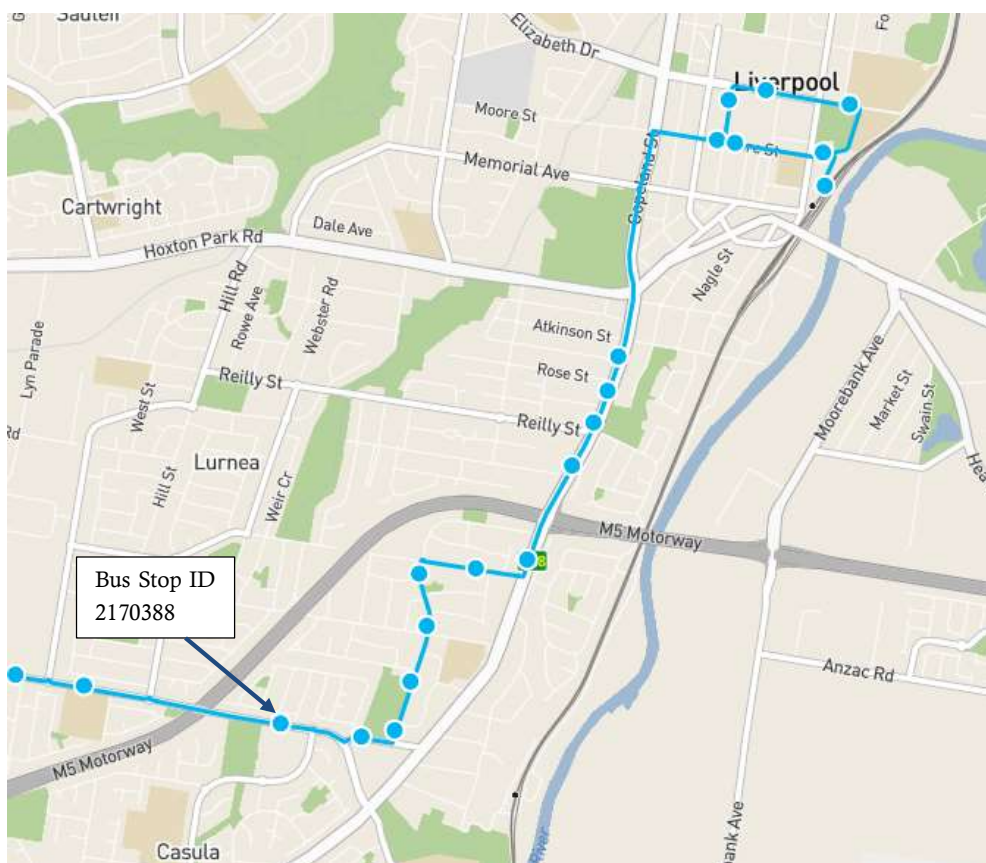


Figure 2.1: Bus Route 851 Casula to Liverpool

Source: Transport NSW

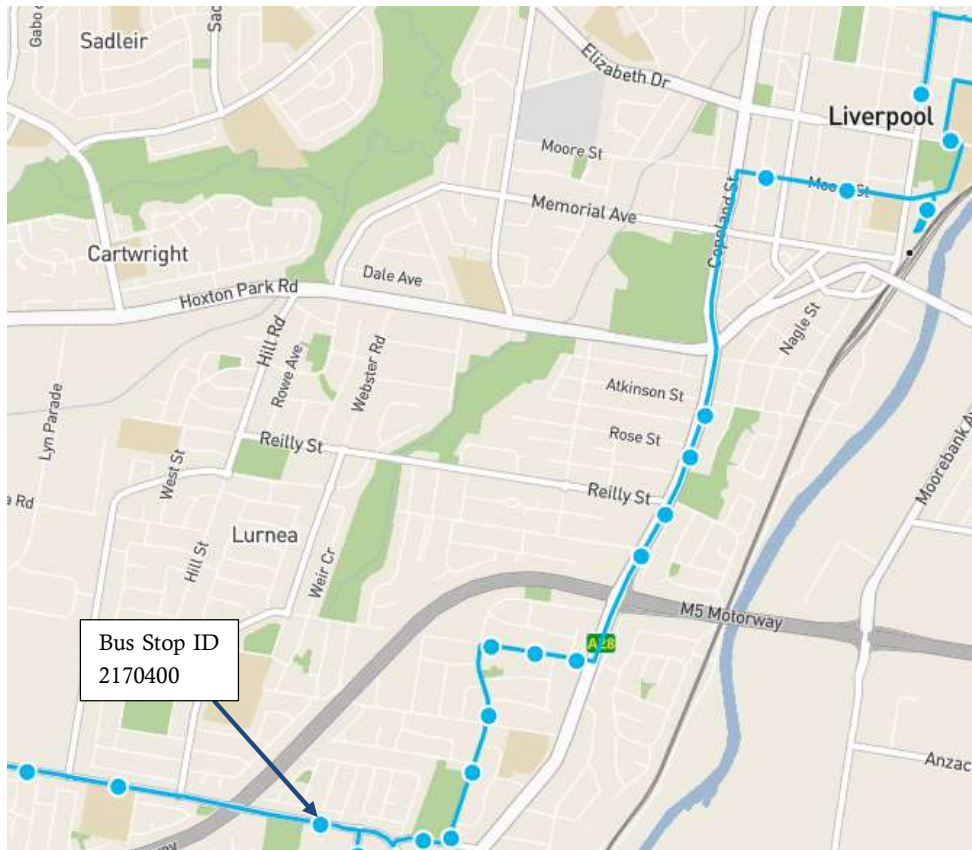


Figure 2.2: Bus Route 851 Liverpool to Casula

Source: Transport NSW

The westbound stop is accessed via a footpath on the south side of Kurrajong Road, and the east bound stop is accessed by a marked pedestrian crossing of Kurrajong Road and a footpath on the northern side of Kurrajong Road. These are shown in the figures below.

The westbound bus stop was measured at 225 metres from the north east corner of the site, and the eastbound bus stop was measured at 333 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), as did kerb ramps at Kurrajong Road, however the pedestrian crossing is on top of a traffic calming speed hump and the speed hump has access ramps from the gutter. These ramps do not comply, with the south ramp having a grade of 1:9 for a distance of 1.56 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 three options to address this:

- Accept the non-compliance, noting that compliance can likely be achieved by addressing the ramp at a small angle, although this would introduce a component of cross fall;
- Fill the bottom of the gutter to reduce the ramp length;
- Avoid use of the pedestrian crossing by relying on bus service 865 to access Liverpool CBD, as this service leaves from the west bound bus stop on the south side of Kurrajong

Road. The service operates half hourly on weekdays e.g. with services at 9.32 and 14.00 and so complying with Clause 26(2)(b)(iii) of the SEPP.

There is an approximate 1.5 metre difference in elevation between the proposed site and the existing footpath. A complying ramp will be required from the site to join the footpath on the south side of Kurrajong Road.

Recommendation 1: Provide a complying ramp between the site and the footpath on the south side of Kurrajong Road.



Figure 2.3: Footpath southern side of Kurrajong Road.

Source: JSA 2020



Figure 2.4: Pedestrian crossing Kurrajong Road.

Source: JSA 2020

The southern footpath along Kurrajong Road is generally concrete 1.2 metres wide, except for the last 33 metres to the corner of the site which is grass. There are a number of damaged and cracked sections which will require replacing. Much of the footpath has a large crossfall, with measured cross falls ranging from 1:14 to 1:32. There is no criterion for crossfall in the SEPP, except that the path is to be safe and suitable, however AS 1428.1 – 2009 requires a maximum cross fall of 1:40, or 1:33 for bitumen surfaces, where the walkway grade is less than 1:33. The clear path behind the bus shelter is 900 mm wide, compared with the 1,000 mm required by AS 1428.1 – 2009.

Recommendation 2: Remove the existing concrete footpath along the south side of Kurrajong Road between the site and the pedestrian crossing/access to Casula Mall and construct a walkway meeting the requirements of AS 1428.1 – 2009.

2.4 Access to Casula Mall

A range of services are available in Casula Mall within 400 metres of the proposed site. These include:

- Medical Centre (390 metres);
- Commonwealth Bank (399 metres);
- Optometrist (352 metres);
- Pharmacy (356 metres);
- Restaurants, cafes and food court (330 metres);
- Coles Supermarket and Liquorland (375 metres);
- Butcher (389 metres); and
- Baker (396 metres).

Other services, including the post office (420 metres), newsagent and Kmart were outside the 400 metres distance criteria.

Casula Mall is accessed from the footpath on the southern side of Kurrajong Road by a pedestrian path through the car park, shown in the figure below.



Figure 2.5: Pedestrian access to Casula Mall.

Source: JSA 2020

The path to the main mall entrance complied with the gradient requirements of the SEPP. Gradients within the mall were not assessed as the mall was assumed to be BCA compliant with regard to access. Access to the medical centre and Commonwealth Bank is via a footpath on the east side of the mall. That footpath has a non-compliance at a kerb ramp, with the southern ramp gradient at a road crossing (shown in the figure below) measured at 1:7.6 for 1.3 metres rather than 1:8.

This can be addressed by:

- Accepting the non-compliance, noting that compliance can likely be achieved by addressing the ramp at a small angle, although this would introduce a component of cross fall;
- Increasing the length of the ramp; or
- Relying on Liverpool CBD for access to medical and banking services.
-



Figure 2.6: Kerb ramps along access to medical centre and bank at Casula Mall.

Source: JSA 2020

2.5 Access to Daruk Park, Casula Library and Casula Community Hall

Access to Daruk Park, Casula Library and Casula Community Hall is available from the rear entrance of the site at Randwick Close utilising an existing concrete footpath. There is no formed pathway from the end of the footpath at Daruk Park to the library and community hall.

Using this route, the park is 36 metres, the library is 204 metres and the community hall is 245 metres from the southern pedestrian entrance to the site.

The route is shown in the pictures below.



Figure 2.7: Existing concrete walkway from Randwick Close.

Source: JSA 2020



Figure 2.8: Access to library and community hall through Daruk Park.

Source: JSA 2020

There is no kerb ramp at Randwick Close. The existing concrete footpath is 2.0 metres wide and compliant with the gradient requirements of the SEPP, however is overgrown. The path through Daruk Park is non-compliant due to excessive cross falls and lack of a sealed surface. The existing pathways to the library and community hall providing access from Ingham Drive are compliant with the requirements of the SEPP.

The access to Daruk Park, library and community hall can be made compliant by construction of a sealed footpath from the existing concrete footpath from Randwick Close, joining the existing access footpaths to the library and community hall from Ingham Drive. Provision of seating along the pathway through Daruk Park would also enhance access to open space for residents.

Recommendation 3: Construct a walkway meeting the requirements of AS 1428.1 – 2009 from the site via existing walkway from Randwick Close to the existing walkway at Ingham Drive, including provision of seating in Daruk Park.

2.6 Access to services and facilities in Liverpool CBD from bus stops in Elizabeth Street and Moore Street, Liverpool.

Access was assessed from bus stop ID 2170556 in Elizabeth Street to Westfield Liverpool and to bus stop ID 2170234 in Moore Street via both Macquarie Street and George Street. The bus stops and various streets are shown in the figures below.

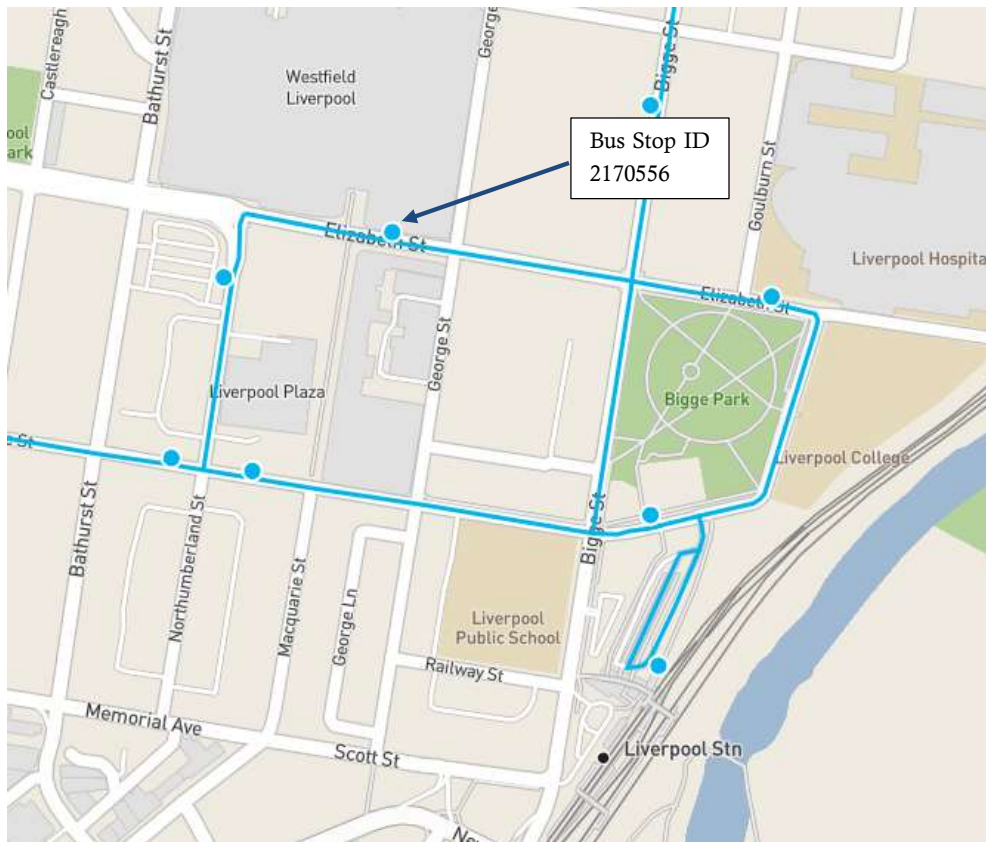


Figure 2.9: Bus Route 865 Casula to Liverpool

Source: Transport NSW

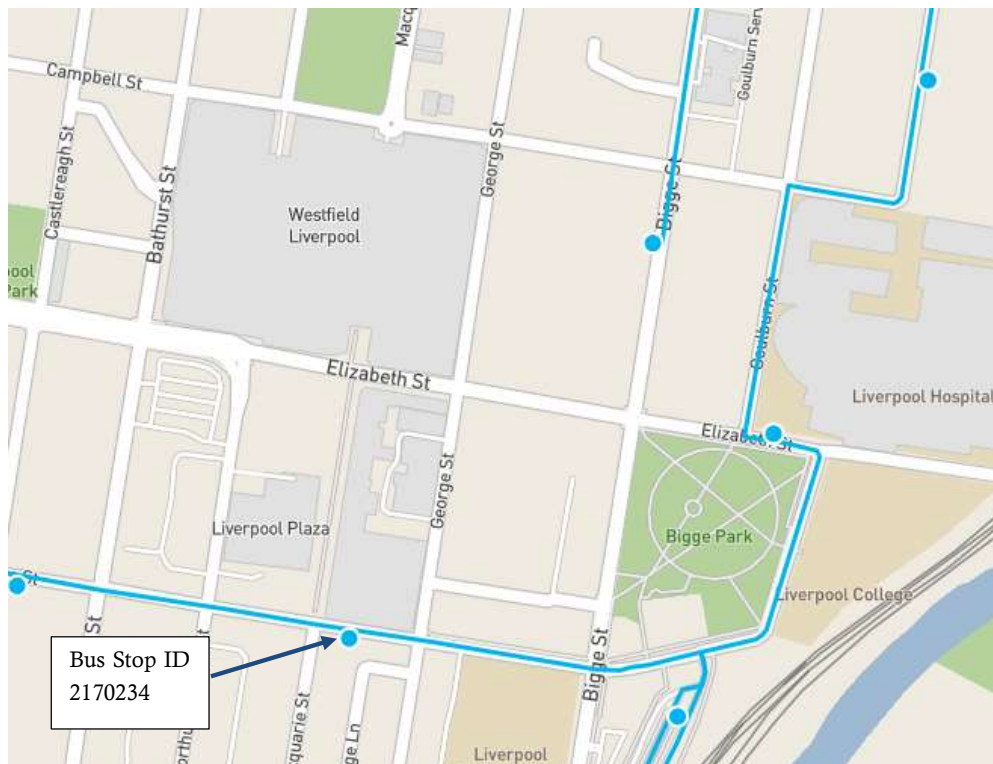


Figure 2.10: Bus Route 851 Liverpool to Casula

Source: Transport NSW

Apart from a wide range of shops, services and facilities in Westfield Liverpool, those of particular interest are the Post Office and Cinema. The main Elizabeth Street entrance to Westfield Liverpool is not compliant with the access ramp gradient assessed as 1:11.8 for a length of 7.0 metres. Alternative access is available via the George Street entrance.

There is a non-compliant kerb ramp at the Westfield car park entrance in George Street (1:9.1 for a distance of 2.0 metres), however this ramp is compliant with the gradient requirements of the SEPP if crossed at a slight angle, reducing the gradient to 1:10. Using this route, the distance to the Post Office was measured at 150 metres. Access to the Cinema was assessed via the George Street entrance, the lift to level 2 and the inclined travelator to the Cinema level. Access to the Cinema is then via a wheel chair lift. There is an alternative route taking the lift to the roof top car park and then crossing the car park to the Cinema. This route was not assessed. While AS1428.1 – 2009 does not allow the inclusion of a moving walk in a continuous accessible path of travel,² the concierge service at Westfield Liverpool advised this was the preferred route for disabled access, and that the concierge service would provide assistance to disabled people to use the inclined travelator.³ Using this route, the distance to the Cinema was measured at 312 metres.

The distance from the Post Office to the return bus stop in Moore Street was measured at 438 metres, and the distance from the Cinema is greater again, so that the use of this return bus stop does not comply with the SEPP, however compliance can be achieved by taking a bus from the

² Clause 6.1.

³ Personal communication 8 February 2020.

bus stop in Elizabeth Street to the interchange at Liverpool Station and changing to a return bus to Casula.

A range of services are available along Macquarie Street mall and Moore Street. These include:

- Op Shop (63 metres);
- Bakery (127 metres);
- TAB and Liverpool Plaza (159 metres);
- ANZ Bank (182 metres);
- Club Liverpool (235 metres);
- Hotel including bar (300 metres);
- Return Bus Stop ID2170234 (337 metres);
- Newsagent (340 metres); and
- Medical Centre (362 metres).

Additional services are available along George Street. These include:

- Dentist, Court House and Police (190 metres);
- Liverpool City Library (341 metres); and
- Return Bus Stop ID2170234 (407 metres).

The route from Liverpool City Library to Return Bus Stop ID2170234 was 270 metres.

Gradients along the route comply with the SEPP with the exception of access to Liverpool City Library. Liverpool City Library is accessed via a ramp from George Street to the plaza level and then via another ramp to the library entrance. The first of these ramps does not comply with the SEPP, with the lower section of the ramp having a gradient of 1:11.2 over a distance of 8.0 metres.

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 Casula Mall and Liverpool CBD, **subject** to construction of a complying access pathway between the site and the entrance to Casula Mall along the southern side of Kurrajong Road.

Complying access to community services and recreation facilities is available at bus stops in Kurrajong Road, Casula Library, Casula Community Hall, Daruk Park and Liverpool CBD **subject** to construction of a complying access pathway between the site and Casula Library through Daruk Park and provision of seating in Daruk Park.

Complying access to the practice of a general medical practitioner is available in Liverpool 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	Optometrist	Casula Mall	352 metres
	Pharmacy	Casula Mall	356 metres
	Restaurants, cafes and food court	Casula Mall	330 metres
	Coles Supermarket and Liquorland	Casula Mall	375 metres
	Butcher	Casula Mall	389 metres
	Baker	Casula Mall	396 metres
	Op Shop	Liverpool CBD	63 metres
	TAB and Liverpool Plaza	Liverpool CBD	159 metres
	ANZ Bank	Liverpool CBD	182 metres
	Newsagent	Liverpool CBD	340 metres
Community services and recreation facilities	Dentist	Liverpool CBD	190 metres
	Public Transport	Bus Stop ID 217400 (to and from Liverpool CBD, Liverpool Bus Interchange and Liverpool Railway Station), Kurrajong Road	225 metres
	Daruk Park	Kurrajong Road	36 metres
	Casula Library	Ingham Drive	204 metres
	Casula Community Hall	Ingham Drive	245 metres
	Cinema	Westfield Liverpool	312 metres
	Post Office	Westfield Liverpool	150 metres
	Club Liverpool	Liverpool CBD	235 metres
	Hotel	Liverpool CBD	300 metres
	Court House	Liverpool CBD	190 metres
The practice of a general medical practitioner	Police	Liverpool CBD	190 metres
	Medical Centre	Liverpool CBD	362 metres

Source: JSA 2020

3.2 Recommendations

Recommendation 1: Provide a complying ramp between the site and the footpath on the south side of Kurrajong Road.

Recommendation 2: Remove the existing concrete footpath along the south side of Kurrajong Road between the site and the pedestrian crossing/access to Casula Mall and construct a walkway meeting the requirements of AS 1428.1 – 2009.

Recommendation 3: Construct a walkway meeting the requirements of AS 1428.1 – 2009 from the site via the existing walkway from Randwick Close to the existing walkway at Ingham Drive, including provision of seating in Daruk Park.