

Ref: AN16-207387 20160902 LTR-Rev6\_LP

1 February 2017

**Planning Ingenuity**

Suite 210, 531-533 Kingsway  
MIRANDA NSW 2228

Attention: **Julie Horder**

Dear Julie,

**Re: Accessibility Statement**  
**Project: Proposed Seniors Living Development**  
**Address: 58 Laitoki Road, Terrey Hills NSW 2084**

Philip Chun Access has been engaged by Planning Ingenuity to undertake a review of the site proposed for a Seniors Living Development with regard to the requirements of the State Environmental Planning Policy: Housing for Seniors and People with Disabilities 2004 (SEPP) for accessibility. The outcome of this review is a preliminary report for the purposes of the Site Compatibility Certificate. A more detailed review will be undertaken as a part of the development application should the Site Compatibility Certificate be granted.

SEPP encourages the provision of housing for seniors and persons with a disability and accommodates the requirements of AS1428, AS4299 and AS2890.1. The Policy aims to encourage the provision of housing (including residential care facilities) that will increase the supply and diversity of residences that meet the needs of seniors or people with a disability; make efficient use of existing infrastructure and services; and be of good design.

These aims will be achieved by setting aside local planning controls that would prevent the development of housing for seniors or people with a disability that meets the development criteria and standards specified in this Policy; setting out design principles that should be followed to achieve built form that responds to the characteristics of its site and form; and ensures that applicants provide support services for seniors or people with a disability for developments on land adjoining land zoned primarily for urban purposes.

The SEPP has siting requirements to ensure the location of the site and topography is suitable for both seniors and people with disabilities. SEPP Clause 26: Location and Access to Facilities; and Clause 38: Accessibility need to be considered in the site selection process.

The following survey documentation has been reviewed (prepared by Calder Flower Architects).

Document No	Title	Revision
15140 SD04	Site Plan	
15140 SD05	Floor Plans Level 1 & 2	
15140 SD06	Floor Plans Level 3 & 4	



## SEPP Clause 26: Location and Access to Facilities

A SEPP development must offer access to services such as shops, banks, retail services, commercial services, recreational facilities, community facilities and doctors. Clause 26 provides for a 400m distance between the development and these facilities. It is noted that Land and Environment Court recently confirmed that the 400m provision in Clause 26 is a development standard amenable to variation in appropriate cases.

For development within the Sydney Statistical Division, the relevant facilities provided for in Clause 26, such as shops, banks, retail services, etc are to be located within the (variable) 400m distance to the site or to a bus stop located within the (variable) 400m distance.

This report deals with the access to the bus stop.

Bus services operate along Myoora and Booralie Roads and bus stops are located within walking distance to the site – refer to Figure 01.

Forest Coach Lines bus routes L70 and 270 travel along Myoora Road. This offers access to facilities such as Frenchs Forest Forestway Centre, Glenrose Shops and Wynyard in the CBD.

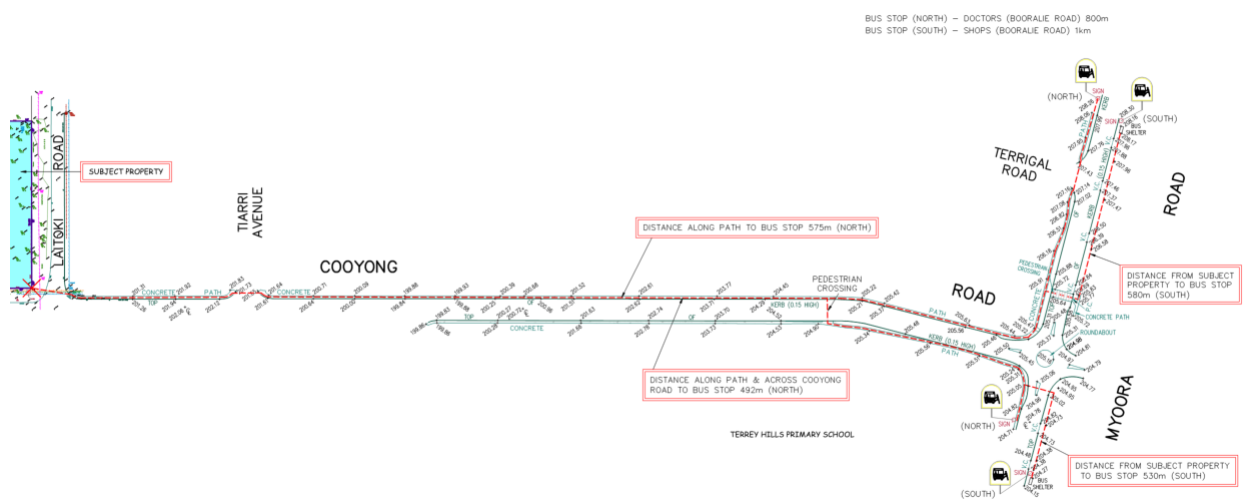


Figure 01 – Proximity of Bus Stops to the site

The bus stop located along Myoora Road is approximately 492m north of the site (for northbound services) while bus stop along Myoora Road for southbound services is approximately 530m south of the site. The existing street footpath along Cooyong Road that provides access to Myoora Road is formed and offers a path of travel within the requirements of the SEPP to bus stops as illustrated in Figure 02. The street footpath will need to be extended to the site entrance to meet SEPP requirements. The path of travel to the bus stops offers gradients that are within the parameters of the SEPP and we note that the footpaths are relatively flat.

We have been advised that to supplement the public transport services available within the immediate area, a courtesy bus will be provided on-site for residents. This service will provide drop-off and pick-up services to local centres at least once a day.

We consider that the site meets the requirements of this SEPP Clause 26: Location and Access to Facilities in regard to travel distances to bus stops which requires a (variable) 400m distance as follows:

- Extended travel distances are considered marginal;



- A courtesy bus is to be provided on site;
- Existing footpaths to the bus stops are level and direct and will be extended to the site entrance as a part of the proposed development.

We do not consider that the extended travel distances will greatly affect the accessibility to the site for residents of the proposed development based on the following.



*Figure 02 – Existing Footpath from the site to Myoora Road  
along Cooyong Road*

400m is the maximum distance between bus stops as prescribed by the State Transit Bus Infrastructure Guide 2011. This distance does not take into account topography. Further, 400m is considered within the urban design industry as the assumed limit for “walkability” as for distances greater than this, it is more likely for a private vehicle to be used. 400m is also the assumed “five-minute-walk” distance.

Outside the home, people with disabilities face access difficulties most commonly in public venues, general services and moving around their local area which affects quality of life (Watson & Nolan, 2011). The health status and the stamina of people with a disability have an important bearing on their quality of life and on their capacity to participate in work and social activities. This is also relevant to the senior population and principles of ageing in place.

Less than half of people with a disability regularly drive a car (Pund, 2002). Almost one person in four with a disability either does not use or has a difficulty using public transport for accessibility reasons. These include getting on or off, transferring between services, getting to the stop or station, and the availability of public transport within the immediate area. The introduction of the (variable) 400m maximum distance to a bus stop or local centre, as prescribed by the SEPP, ensures that accessing public transport for people with a disability or seniors remains achievable.



The SEPP allows for the following gradients along a path of travel to a bus stop or local centre.

- Overall average gradient of 1:14
- Slopes up to 1:12 for maximum of 15m at any one time
- Slopes up to 1:10 for maximum of 5m at any one time
- Slopes up to 1:8 for maximum of 1.5m at any one time

In the case of this development, we note that the path of travel to the bus stops is generally level with little gradient. This allows for level resting points along the path of travel to the bus stops for people with low stamina. Given that the above mentioned gradients are permissible along a path of travel and the average permissible gradient is 1:14, we consider that the increased travel distances in this instance will not adversely affect accessibility. The energy exerted to travel along a flat footpath is much less than that required to travel along a gradient of 1:14 – for example, under AS1428.1 (2009), a gradient of 1:14 is considered an accessible ramp and requires landings at 9m intervals. As such, we consider that the extended distances to the bus stops from the proposed development site are in keeping with the intent of the SEPP and will offer a safe, direct and accessible path of travel for residents.

### **Clause 38: Accessibility**

A SEPP development should have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities. A development should provide attractive, yet safe, environments for pedestrian and motorists with convenient access and parking for residents and visitors.

*We note that this clause can be met through appropriate design of the proposed development.*

### **Schedule 3 Clause 2**

Schedule 3 Clause 2 of the SEPP is also relevant to the siting of a development.

Where the whole of the site has a gradient of less than 1:10, 100% of the dwellings must have wheelchair access by a continuous path of travel within the meaning of AS1428 to an adjoining public road or an internal road or a driveway that is accessible to all residents.

If the whole of the site does not have a gradient of less than 1:10, a percentage (which is not less than the proportion of the site that has a gradient of less than 1:10, or 50%, whichever is the greater) of any dwellings must have wheelchair access by a continuous accessible path of travel (within the meaning of AS 1428) to an adjoining public road or an internal road or a driveway that is accessible to all residents.

*The site has a gentle fall as shown on the survey drawings. This will allow 100% of the dwellings to be wheelchair accessible.*

We consider that the location of the site is compatible to a SEPP Housing for Seniors and People with Disabilities being located within close proximity to bus stops that provide transport to services such as shops, banks, retail services, commercial services, recreational facilities, community facilities and doctors. The topography of the site will enable 100% of the dwellings to be wheelchair accessible.



If you have any queries in regard to the above, please do not hesitate to contact the undersigned.

Yours sincerely,

Lindsay Perry  
Associate | Accredited Access Consultant  
**Philip Chun Access**

ACAA Accreditation No. 136

References:

Pund, G. (2002) *Urban Form, level of service and bus patronage in eastern Sydney*, 25<sup>th</sup> Australasian Transport Research Forum, Canberra

Watson D, & Noan, B. (2011) Social Portrait of People with Disabilities retrieved from [www.welfare.ie](http://www.welfare.ie)