

Thank you for providing us with the opportunity to review and provide feedback on Blacktown Workers Sports Club's (BWSC) latest application for a Site Compatibility Certificate dated 19 April 2018.

We note this is their second SCC application for their site at 170 Reservoir Road, Arndell Park. The first one was approved on 27 July 2016 and is due to expire on 27 July 2018.

Since they obtained their first SCC, BWSC has been working closely with our Development Services Unit and other sections of Council to finalise their masterplan and development application for stage 1.

The key issues that we raised in our first submission remain relevant. A copy of the submission is attached for your convenience.

We wish to take this opportunity to stress the importance of providing easy access to services and infrastructure access and the provision of services and infrastructure. This is particularly important given that the proposed development entails a high number of elderly residents on site, including residents with dementia and/or limited mobility.

#### Access

1. Many of the required services and infrastructure are not within 400m walking distance of the site. Therefore, meeting these requirements is dependent on access by public transport, specifically by bus.
2. For this to be considered satisfactory, safe and suitable access which is appropriate for residents of a seniors living facility must be available to bus stops for both outgoing and incoming trips. Currently, access to the bus stop on the eastern side of Reservoir Road for southbound trips (eg return from Blacktown) is not satisfactory as it does not meet the 400m walking distance criteria. Access to the Holbeche Road bus stop is not satisfactory as there is no suitable access pathway.
3. The Traffic Impact Assessment provided with the SCC Application suggests signalisation of the Reservoir Road access to the Blacktown Workers Sports Club site. This would provide suitable access to the bus stop on the eastern side of Reservoir Road.
4. The SCC Application Report submitted refers to a local community transport service for the Blacktown LGA. This is an established service which covers the entire LGA. As such it will be a valuable service for the future residents of the facility and supplement the public transport services. Should the community service cease to be available, it is strongly suggested that seniors living facility provide a commensurate alternative service. This is particularly important for direct access to the local hospital precinct.

5. It is suggested that the seniors living facility plan of management include a requirement that details of all access options be made available to all residents. This can be addressed at DA stage.

Seniors SEPP cl 26(1)(a) Access to shops, bank service providers and other retail and commercial services.

6. The 7-Eleven at the corner of Reservoir Road and Penny Place has the potential to meet daily convenience needs within the required 400m walking distance. However, this can only be considered satisfactory if safe access is provided which is appropriate for residents of a seniors living facility. It is expected that access be addressed in detail at DA stage or provision be made for alternative access to daily convenience items.
7. There is a sufficient level of other retail and commercial services available in local centres, including Blacktown CBD and Arndell Park Neighbourhood Centre. However, access to these is dependent on safe and appropriate access to public transport for both outgoing and incoming trips.

Seniors SEPP cl 26(1)(b) community services and recreation facilities

8. Council supports the proposed inclusion of 1,461m<sup>2</sup> floor space identified as community facilities space, 9,550m<sup>2</sup> communal open space, swimming pool and gym. The proposal is not clear whether the swimming pool and gym are intended for the exclusive use of the residents of the seniors living facility. Access to the proposed spaces in a manner which is appropriate for elderly residents is required for the health and well-being of the future residents, to provide for their social needs and promote active aging.
9. There is a sufficient level of other community services and facilities available in the surrounding neighbourhood, including Blacktown CBD. Access to these is dependent on suitable access to public transport.
10. Social and recreation opportunities are also available at Blacktown Workers Sports Club itself. Seniors SEPP cl 23 requires that an appropriate protocol will be in place to manage the relationship between the registered club and the seniors living facility. The SCC Application Report indicates that this will be addressed at DA stage. This is a significant consideration for the mental and financial well-being of future residents and it is expected that a detailed and considered response will accompany the DA.

Seniors SEPP cl 26(1)(c) the practice of a general medical practitioner

11. There is a sufficient level of medical services available, predominantly in the Blacktown CBD and hospital precinct. Access to these is dependent on suitable access to public transport.
12. Currently, to access the Blacktown hospital precinct by public transport requires travel by bus to the interchange at Blacktown and transfer onto a second bus. The local community

transport service provides a shuttle bus directly to the hospital precinct. Direct access is important for less mobile residents or those affected by mental or physical impairment.

13. It is suggested that the seniors living facility plan of management include provision to ensure high levels of safe and suitable access to a range of medical facilities is available for residents. This may include provision for direct shuttle services should the community transport service cease to be available; provision for access to after-hours medical facilities; or provision for on-site GP visits. This can be addressed at DA stage.
14. It is suggested that the developer consult with NSW Health about the capacity of Blacktown Hospital, local general practitioners and after hours medical care providers to ensure there is sufficient capacity to meet the needs of the large number of future residents of the proposed development.