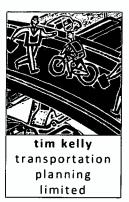
APPENDIX 7 TRANSPORTATION ASSESSMENT

13062017

7 June 2017

KSS Property Ltd 8 Reese Jones Grove Maungaraki LOWER HUTT 5010

For the attention of: Michael Cornell



Michael

57-59 Kingsford-Smith Street, Lyall Bay: Proposed Residential Development Review of Traffic Issues

Background

A proposal has been developed for a 55-unit residential development on the eastern side of Kingsford-Smith Street in Lyall Bay.

Plans for the development have been prepared by Reve Architecture and a pre-application meeting has been held with Wellington City Council (WCC).

The purpose of this document is to is to provide an assessment of traffic and pedestrian issues associated with the proposal.

Existing Environment

Site & Access

The location of the application site is shown by **Figure 1**. This site is bounded to the west and south by Kingsford-Smith Street and Lyall Parade respectively, and to the north and east by adjacent properties.

In the immediate vicinity of the application site, Kingsford-Smith Street has a legal width of 20m, providing for two traffic lanes, a flush median (which tapers towards the south), footpaths to both sides, parallel and angled kerbside parking on the eastern and western sides respectively.

Legal access to the site is provided by means of a dropped kerb 9-10m wide and located 53m from the Lyall Parade intersection.

The intersection of Kingsford-Smith Street with Lyall Parade is priority controlled, with movements from Kingsford-Smith Street required to give-way.

As an urban environment, all roads in this area are subject to a 50 km/hr speed limit and street lighting is provided.

Photos of the existing road environment in this area are shown at Annexure A.

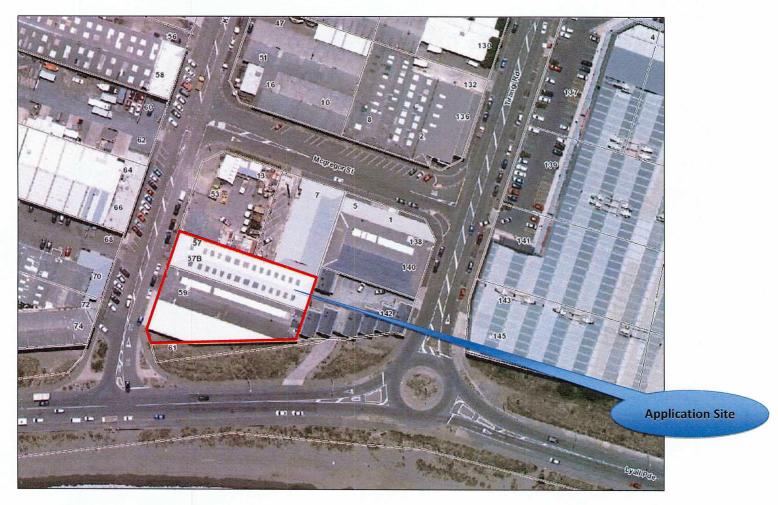


Figure 1: Site Location Plan (Source: WCC GIS Mapping)

Traffic Volumes

WCC has supplied a count of traffic activity for the section of Kingsford-Smith Street to the north of the McGregor Street intersection, summarised at **Annexure B**.

This count, which relates to February 2015, indicates that:

- typical weekday daily traffic volumes are 1,700 2,000 vehicles/day;
- weekday peak period volumes are up to 170 vehicles/hour (10 11am); and
- typical weekend daily traffic volumes are 1,300 1,500 vehicles/day.

These patterns reflect the commercial nature of the activities in this area.

The adjacent sections of Lyall Parade and Tirangi Road (to the north of Lyall Parade) both typically carry 7,000 – 8,000 vehicles/day.

The current traffic volumes are within the capacity of the immediate road network. As a result, congestion is not an issue in this area.

Parkina

Most of the kerbside parking in this area is unrestricted, with the exception of a single P20 restricted space (outside the existing Stihl shop) and P120 limits for a number of the angled spaces on the western side of the street.

Kerbside parking is unrestricted on both sides of Lyall Parade adjacent to the application site.

Crash History

A review of the crash history for this area for period since January 2012 indicates that no incidents have been reported on the frontages of the application site.

One incident did occur on Kingsford-Smith Street to the north of the McGregor Street intersection:

 May 2014 / Tue / 10:30am / a southbound car lost control when leaving or entering a commercial property and collided with a parked vehicle (no injuries).

There is no indication of any systemic safety issues in this area.

By law, only those crashes involving personal injuries are required to be reported. Accordingly, it is possible that a number of other non-injury crashes may have occurred which have not been included in these records.

Walking, Cycling & Public Transport Accessibility

As indicated above, footpaths adjacent to roads in this area provide a continuous pedestrian route between the application site, the seafront and commercial / retail activities. For pedestrians wishing to cross Lyall Parade, median splitter islands are provided at the Lyall Parade / Tirangi Road roundabout and at a point 125m to the west of the Kingsford-Smith Street intersection.

There are no specific cycling facilities in this area, and cyclists are required to share the roadspace with other traffic.

Tirangi Road forms a part of the No. 14 Rongotai – Wellington - Wilton bus route, with a frequent weekday service. Bus stops are located close to the airport retail park,

approximately 240m from the application site. To west, the No. 3 Karori – Lyall Bay bus route operates along Lyall Parade and Onepu Road.

Existing Activity

The application site is (or has until recently been) occupied by:

- a Stihl shop / dealership; and
- an off-site long stay parking / car valet service for Wellington Airport.

These activities will have been responsible for the generation of vehicular activity in this area, though no information is available in this respect.

Other activities in this area are commercial or retail in nature.

Development Proposal

Details of the proposals are shown by plans forming part of the application material.

The proposal includes:

- demolition of existing buildings on the site;
- construction of a five-level building plus basement;
- 55 residential apartments on five levels;
- ancillary swimming pool / spa / sauna / gym / cinema room (for use by residents only);
- four small ground-floor retail tenancies (144m² 255m², totalling 841m²);
- off-street parking for 62 vehicles (13 at ground-level, 49 in basement) with access from Kingsford-Smith Street; and
- a truck dock.

Residential Apartments

Table 1 provides a schedule of the proposed apartments. The apartments range in size from 70m² to 140m², with most providing two or three bedrooms. Most of the larger apartments provide for a 'dual-key' arrangement, including a small single bedroom studio unit which can be occupied separately if required.

Number of Bedrooms	Number of Apartments
1	0
2	24
3	22
4	9
Total	55

TABLE 1: Schedule of Apartments

Retail Units

The four retail units will be operated as tenancies. At this stage, no information is available regarding likely tenants other than some or all of the tenancies may be occupied by restaurants / cafes / bars, consistent with the seafront setting and demand generated by the residential units. No details regarding hours of operation, staffing levels, etc are available at

this stage.

Vehicular Access & Parking

Vehicular access will be directly from the Kingsford-Smith Street frontage with two crossings:

- a two-way crossing 6m wide located approximately 45m from the Lyall Parade intersection, providing access to the ground-level parking area and temporary truckdock; and
- a two-way crossing 6m wide located approximately 56m from the Lyall Parade intersection, providing access to the basement parking area (this will be controlled by a security roller door set back 6m from the back of the footpath).

Off-street parking on the ground-floor will be provided for 13 vehicles, of which two spaces will only be accessible through other spaces in a tandem arrangement.

Access to the basement will be by means of a two-way ramp 5.5m wide, 30m in length and with a gradient of 10%. The basement will provide a further 49 car parking spaces.

The dimensions of all parking spaces will comply with the geometric requirements of standard AS/NZ2890.1:2004.¹ This includes manoeuvring areas, design envelopes in the vicinity of structural columns, headroom (2.2m) and blind aisle provision.

The proposal will require the removal of three kerbside parking spaces on the Kingsford-Smith Street site frontage to accommodate the vehicular accesses described above and provide for appropriate sight-distances for exiting vehicle movements.

Provision will be made for cycle parking within the basement parking area with vertical bike stands.

Pedestrian Movement

Pedestrians entering the apartment complex will do so primarily by means of an entrance lobby on the Kingsford-Smith Street frontage. This will lead to two lifts and a stairwell, providing access to other levels. A secondary pedestrian access with a single lift and stairwell will be located at the south-east corner of the building (with a doorway providing a connection to the ground-floor parking area).

Pedestrian access to the retail units will be from the Kingsford-Smith Street frontage (unit #1) and the Lyall Parade frontage (all units).

A flush painted pedestrian route will be marked within the ground-floor parking area, connecting rear doors for the retail units with the main vehicular entrance and lobby area.

Disability Access

People with disabilities arriving as pedestrians will be able to enter the building by means of the main lobby and access the lifts to other floors. One disability parking space has been identified within the ground-floor parking area, located close to the lifts. The allocation of this space to residents will be governed by requirements. Some scope exists to allocate further space(s) for disabled drivers if warranted by demand.

Servicino

General wastes will be stored in a rubbish room located to the rear of the main lift / stairwell area, with access directly to the rear of the truck dock. Trucks (up to a Medium Service

¹ Australian/New Zealand Standard: Parking Facilities, Part 1: Off Street Car Parking. Standards NZ, 2004.

Vehicle in size) will reverse in to the truck dock and then drive out forwards after loading / unloading. A height of 4.5m will be available between the ground floor and first floor.

Assessment of Effects

Traffic Generation

A traffic generation rate typically applied for 'conventional' residential dwellings is 8-9 vehicle movements / day / dwelling. For higher density apartments such as those proposed, it can be expected that rates of traffic generation would be lower.

The NZ Trips & Parking Database² suggests that multi-unit, multi-storey residential dwellings within inner-city areas typically generate 6 – 8 traffic movements per household per day. Research from New South Wales suggests that daily vehicle trips associated with high density residential flats is 4.6 per unit. ³

With the location away from the central city but with reasonable public transport available and some facilities available for residents on-site (pool, spa, sauna, gym, cinema room), it is considered that a rate of 7 vehicle movements / day / residential unit would represent an appropriate 'worst-case' for assessment purposes. On this basis, the residential component of the development would generate 385 vehicle movements per day, of which approximately 35 – 40 could be expected to occur in weekday peak periods. In deriving these estimates, it is assumed that all of the apartments will be occupied by permanent residents (rather than holiday or short-term rentals).

With no information regarding the likely retail tenants, traffic generation associated with the retail tenancies is unknown. The small size of the tenancies means they are unlikely to provide services or products which attract a high number of vehicle trips. For example, a café, bar or restaurant would operate as a service to many of the apartment occupants and other residents / visitors to the area, without generating many additional vehicles trips. For these reasons, it is considered unlikely that the retail units combined would attract more than 150 additional vehicle movements per day to this area.

Total traffic generation associated with the development would therefore be no more than 535 vehicle movements/day.

It should be noted that the former activities located on this site will have been responsible for vehicular activity, especially the use of part of the site for longer-stay airport parking. Accordingly, the net effect of the current proposal will be less than that indicated above.

The road network in the immediate vicinity of the site is not subject to any congestion on a regular basis and these additional vehicle movements can be accommodated with causing any significant delays to other vehicle movements.

Access Safety & Efficiency

In the vicinity of the application site, Kingsford-Smith Street is both straight and level, providing for good sight-lines in both directions. A sight-line of at least 45m (the minimum Stopping Sight Distance required for a frontage road speed of 50 km/hr) can be achieved.

The speed data collected by WCC indicates that the mean and 85th percentile speeds on Kingsford-Smith Street are 37 and 45 km/hr, below the posted speed limit. Furthermore, the proximity of the access points to the Lyall Parade and McGregor Street intersections means

² Trips & Parking Related to Land Use: Volume 1. Transfund NZ Research Report 209. Douglass, M & McKenzie, D, 2001.

³ NSW Guide to Traffic Generating Developments: Updated Traffic Surveys. Note TDT 2013/04a, 2013.

that vehicle speeds in this area are likely to be below those recorded by WCC (which relate to a location 100m to the north of the McGregor Street intersection).

These reasons, combined with low levels of background traffic on Kingsford-Smith Street means that vehicle movements to and from the proposed development will occur safely and without any significant disruption to other traffic.

For the access to the basement parking area, the location of a security roller door 6m back from the rear edge of the footpath (to be controlled by a card reader or automatic vehicle identification) will ensure that arriving vehicles will stop clear of the footpath.

Internal Vehicle Movement

All of the individual parking spaces and manoeuvring areas will comply with the geometric requirements of AS/NZ2890.1:2004, ensuring their convenience and safety of use.

Parking Supply & Demand

The development will provide a total of 62 off-street parking spaces. These will be allocated one per residential apartment unit (55) and one per retail tenancy (4), with the remaining three spaces to be allocated as indicated by demand (either for staff of the retail units or to apartment visitors). It is not intended that parking will be provided for customers of the retail units — as for the other small commercial units in this area, these will utilise kerbside parking.

Potential purchasers of the apartments will be aware that off-street parking will be available for one vehicle. As a result, the likelihood of apartment residents wishing to operate more than one vehicle will be low.

Most visitor activity can be expected to occur in evenings and at weekends, and the same would apply to customer activity if the retail units are occupied by cafes, bars or restaurants. At these times, the usage of kerbside parking in the wider area is likely to be low (because the adjacent activities are commercial in nature) and spaces will be available for use by visitors / customers, representing an efficient use of the available kerbside parking resource.

For these reasons, the development is expected to be generally self-sufficient with regard to off-street parking provision, with no significant additional demand created for the use of the existing kerbside parking in this area at the times when it is most heavily utilised.

Pedestrian Movement & Safety

The proposed development will result in two vehicle crossings on the eastern side of Kingsford-Smith Street. These will replace the existing double-width crossing which has provided access for the previous activities on the site. While it can be anticipated that there will be a net increase in vehicular activity using the crossings, this is not expected to result in any significant impact upon the convenience of pedestrians using the footpath.

Both of the new vehicle crossings will provide for an appropriate visibility splay to enable exiting drivers to view approaching pedestrians on the footpath. From the ground-floor parking area, the corner of the 'Retail 1' unit will be angled to provide the necessary splay. The walls of the main lobby area will include glazed view slots to enable drivers exiting to the street from the basement parking area ramp to view any approaching pedestrians from the south.

As a result, while pedestrian activity is not high in this area, the safety of pedestrians will be ensured by the provision of appropriate inter-visibility with vehicle drivers.

Servicing

The site will accommodate a medium service vehicle for servicing purposes, though the size and organisation of the site precludes an ability for this vehicle to be turned around within the site. As a result, this vehicle will be required to reverse in from the street frontage, but as a 'Local' road with low levels of traffic activity, this will not present any specific capacity or safety concerns. Any pedestrians on the footpath will be alerted to the manoeuvring of the truck by its reversing warning beeper.

After servicing activity, the truck will then be able to manoeuvre back to the street in a forward direction. Again, the glazing of the adjacent lobby area will provide the truck driver with warning of any approaching pedestrians.

Importantly, no servicing will take place from the road frontage.

The presence of a service vehicle will temporarily reduce the width of the access to the ground-level parking area to approximately 3.5m, restricting the movement of other vehicles to one direction at a time. In the unlikely event that other vehicles are wishing to enter and leave the ground-level parking areas at the same time, sufficient inter-visibility will be available between drivers to ensure that one vehicle waits until the other vehicle has completed its manoeuvre. It is stressed that the visits of a servicing truck are expected to be of short duration, for the purposes of unloading goods or loading rubbish.

District Plan Requirements

Relevant Plan & Status

The relevant plan is the Wellington City Council District Plan (WCCDP), which became operative in July 2000 (with subsequent plan changes).

The application site is located in the 'Business 1' Activity Area.

Kingsford-Smith Street and Lyall Parade are classified as a 'Local Road' and a 'Principal Road' respectively in the roading hierarchy.

Objectives, Policies: Business Area

Objective 33.2.1: To provide Business Areas that can accommodate a wide range of business and industrial activities to meet the social and economic needs of the City.

Policy 33.2.1.2: Enable the outward expansion of existing, or the creation of new areas for business and industrial activities, where they:

 are accessible from the roading network without generating more than minor adverse effects on the roading network and the hierarchy of roads from potential trip patterns, travel demand or car use.

Methods: Rules.

Response: This assessment has demonstrated that the proposed activities will not generate sufficient vehicular activity to cause any adverse effects in the vicinity of the accesses or on the wider network which are more than minor. Vehicular access will be to a 'Local' road where such access is anticipated and so will not compromise the intended road hierarchy functionality. Vehicular activity associated with the site needs to be viewed in the context of the former uses of the site (part of which was for car-parking) and other vehicle-generating activities which would be enabled as of right and anticipated in the Business Area.

Objective 33.2.2: To enable an appropriate range of activities to occur in Business Areas, provided they do not undermine the City's Centres, and that adverse effects are avoided, remedied or mitigated.

Policy 33.2.2.1: Maintain a mixed use character in Business 1 Areas by allowing a range of activities to establish provided that character and amenity standards are maintained and any potential adverse effects are able to be satisfactorily avoided, remedied or mitigated.

Methods: Rules.

Response: This assessment has demonstrated that any effects associated with vehicular or pedestrian activity will be less than minor.

Objective 33.2.6: To maintain an efficient and sustainable transport network that enables the provision of convenient and safe access for people and goods to and within Business Areas.

Policy 33.2.6.1: Ensure that activities and developments are designed to be accessible by multiple transport modes.

Methods: Rules.

Response: In addition to providing for private vehicular travel, bus routes providing connectivity to the city centre are within a reasonable walking distance and the area provides for a high degree of pedestrian and cycle accessibility.

Policy 33.2.6.2: Ensure that the location and design of activities and developments that generate significant levels of traffic or increase demand for parking are accessible by multiple transport modes and do not result in:

- a significant increase in traffic that would be incompatible with the capacity of adjoining roads and their function in the road hierarchy, or would lead to unacceptable congestion; or
- an on-street parking demand that extends into Residential Areas and/or leads to unsatisfactory parking arrangements; or
- the creation of an unacceptable road safety risk.

Methods: Rules.

Response: The proposal will be generally self-contained with respect to parking provision. Occasional visitor parking demands associated with the residential apartments are unlikely to coincide with the use of kerbside parking for commercial / industrial activities – this 'time-sharing' represents an efficient use of the available parking resource. Access and parking will not result in any unacceptable safety risks.

Policy 33.2.6.3: Support and maintain the defined road hierarchy as defined on District Planning Map 33.

Methods: Rules.

Response: The formation of access to a 'Local' road rather than Lyall Parade (a 'Principal' road) is consistent with the defined road hierarchy.

Policy 33.2.6.4: Maintain or enhance safe, convenient and easily legible pedestrian access to buildings.

Policy 33.2.6.5: Encourage buildings and spaces to have a high degree of accessibility, particularly for people with restricted mobility.

Methods: Rules.

Response: The proposed building will have a high degree of external and internal pedestrian accessibility. Access will be safe, convenient and legible. For people with mobility impairments, a level access route is provided from the road frontage and ground-floor parking area, connecting to the lifts from where access is provided to other levels of the building. All of the retail tenancies will be wheelchair accessible.

Policy 33.2.6.6: Require the provision of appropriate servicing and site access for activities in Business Areas.

Methods: Rules.

Response: Servicing requirements will be minimal but off-street provision will be made with a loading dock accommodating a Medium Service Vehicle. Site accesses will operate safety and with minimal impact upon vehicle movements in this area.

Rules: Business Area

Rule 34.3.1: Any activity that provides more than 70 parking spaces is a Discretionary Activity (Restricted).

Response: the total number of off-street parking spaces is <70. Nonetheless, this assessment has addressed the matters which are required to be considered had the number of spaces exceeded this threshold.

Rule 34.3.4.6: Activities which would be Permitted or Controlled Activities but that do not meet standards for vehicle parking, servicing and site access (standard 34.6.1.6) are Discretionary Activities (Restricted). Discretion is restricted to the effects generated by the standard(s) not met.

Response: regardless of this requirement, RDA status is triggered by Rules 34.3.5 & 34.3.6 below.

Rule 34.3.5: The construction of, or the addition to, buildings and structures in Business 1 Areas resulting in a total gross floor area exceeding 500m² are Discretionary Activities (Restricted) is respect of:

- 34.3.5.3 site layout, parking and site access
- 34.3.5.4 adequate on-site car parking provision
- 34.3.5.5 the provision and location of facilities for multi modal transport
- 34.3.5.6 provision for pedestrian movement.

Response: as the development includes residential activities, this rule does not apply (refer 34.3.6 below).

Rule 34.3.6: The construction of new buildings, or the conversion of existing buildings, for residential activities on any site within Business 1 Areas are a Discretionary Activity (Restricted) is respect of:

- 34.3.6.4 site layout, parking and site access
- 34.3.5.4 adequate on-site car parking provision
- 34.3.5.5 the provision and location of facilities for multi modal transport
- 34.3.5.6 provision for pedestrian movement.

Response: as the development includes residential activities which are located within

the air noise boundary, this rule does not apply (refer 34.3.7 below).

Rule 34.4.7: The construction of new buildings for noise sensitive activities within the air noise boundary are Discretionary Activities (unrestricted).

Response: while the consent status is triggered by noise matters, this assessment has nonetheless addressed all of the access, parking, pedestrian and servicing matters.

Standards: Business Area

Standard 34.6.1.6.1: All parking to be provided and maintained in accordance with Sections 1, 2 and 5 of AS/NZ2890.1:2004.

Response: complies – the geometry of the parking spaces, manoeuvring areas and access ramp will meet the AS/NZ2890.1:2004 requirements.

Standard 34.6.1.6.2: Where parking is located within a building, a minimum height clearance of no less than 2.2m is required.

Response: complies – available clearances within basement parking area will exceed 2.2m.

Standard 34.6.1.6.3: The gradient for carparking circulation routes shall be not more than 1:8.

Response: complies – all gradients will be <1:8.

Standard 34.6.1.6.4: Open vehicle parking areas or parking at ground level within a building must not be situated at ground level at the front of sites which adjoin the Open Space A zoned land fronting Lyall Parade.

Response: complies – site does adjoin Open Space A but ground level parking will not be at the front of the site or visible.

Standard 34.6.1.6.5: On each site in Business Areas, at least one loading area shall be provided as follows:

- where loading areas are located within a building, a minimum height clearance of 4.25m is required;
- for buildings serviced by lifts, all levels shall have access to a loading area by way of a lift;
- the loading area shall be located no further than 15m from a lift and there shall be level access between them; and
- turning paths shall be based on the standard for a medium rigid truck.

Response: complies – truck will not be required to turn within the site.

Standard 34.6.1.6.6: For loading areas located outdoors, the minimum width shall be 3m and the minimum length 9m.

Standard 34.6.1.6.7: For loading areas located within a building, the minimum width shall be 4m and the minimum length 9m.

Standard 34.6.1.6.8: New servicing and loading areas at ground level within a building must not be situated at ground level at the front of sites which adjoin the Open Space A zoned land fronting Lyall Parade.

Response: complies – loading area is not fully enclosed but will provide sufficient room for loading / unloading activity while allowing other vehicle movements and pedestrians to pass. Although the site does adjoin Open Space A, the loading area will

not be visible from the Lyall Parade frontage.

Standard 34.6.1.6.9: Site access to be provided and maintained in accordance with Section 3 of AS/NZ2890.1:2004.

Response: complies with respect to available sight distances and the provision of pedestrian visibility splays. Does not comply with respect to access width (greater than 5.5m) but any associated effects will be negligible.

Standard 34.6.1.6.10: subject to standard 34.6.1.6.12 no vehicular access shall be situated closer to an intersection than ... Principal Street 20m, other streets 10m.

Response: complies – distances from accesses to either the McGregor Street or Lyall Bay intersections exceed the minimum values.

Standard 34.6.1.6.11: no vehicle access is permitted to a site across any restricted road frontage.

Response: complies – this is not a restricted road frontage (and access was previously formed).

Standard 34.6.1.6.12: maximum of one vehicle access to any site except that sites with more than one frontage may have one access across each frontage.

Response: does not comply – the organisation of the site requires that two accesses are provided on the Kingsford-Smith Street frontage. It is noted that the former use of the site provided for separate accesses for #57 & #59, so if considered as two sites, then the proposal would be compliant. Regardless, the operation of the two accesses will not result in any adverse effects upon other vehicle or pedestrian movements which are more than minor.

Standard 34.6.1.6.13: sites adjoining the Open Space A zoned land fronting Lyall Parade must not gain vehicle access from Lyall Parade.

Response: complies – no vehicle access from Lyall Parade frontage.

Standard 34.6.1.6.14: the width of any vehicle crossing to a site not to exceed 6m.

Response: does not comply – main access will be 7.5m wide. This is necessary to accommodate service vehicles and will not be detrimental to the safety of pedestrians on the footpath.

Standard 34.6.1.6.15: where vehicular access can be provided from a service lane or right-of-way registered in favour of the site or other private road or private right-of-way, no vehicle access shall be from a street.

Response: complies - no service lane or private RoW available.

Standard 34.6.1.6.16: all access to sites must be designed to permit a free flow of traffic so that vehicles do not queue on the street.

Response: complies – no parking spaces are provided adjacent to the access location. In this respect, Kingsford-Smith Street is a 'Local' road with relatively low volumes of traffic and momentary delays associated with use of the accesses and any adverse effects upon the operation of the road network will be no more than minor.

Conclusions

A proposal has been developed for a 55-unit residential development on the eastern side of Kingsford-Smith Street in Lyall Bay.

This assessment of the transportation aspects of the proposal concludes that:

- the additional traffic activity generated by the development will not materially affect the operating efficiency of Kingsford-Smith Street or the wider roading network;
- the development replaces commercial activities which included long-term parking associated with the airport this means that the net effect of the current proposal is in terms of traffic generation is likely to be small;
- the proposed vehicular access arrangements will operate safety, with adequate sightdistances, access to a 'Local' road with low levels of traffic activity;
- the proposal provides for a high degree of pedestrian accessibility and the safety of pedestrian movements along the footpath will be ensured;
- the development will be generally self-sufficient in the provision of car-parking, providing sufficient on-site parking to avoid the possibility of any additional demand for kerbside parking at times when this is likely to be in higher demand;
- the development will be consistent with the relevant objectives and policies for the Business 1 Area, and compliant with most of the relevant rules;
- areas of non-compliance are minor or technical in nature and will not be associated with any adverse effects which are more than minor; and
- overall, the proposed development will have negligible effects upon the operation of the road and pedestrian networks in this area.

Yours sincerely,

T. m. Kelly

Tim Kelly

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ANNEXURE A: EXISTING ROAD ENVIRONMENT - PHOTOGRAPHS



Photo 1
View to SW along Kingsford-Smith
Street, application site on left
(April 2017)



Photo 2
View to NE across Kingsford-Smith
Street towards application site
(April 2017)



Photo 3
View to SW along Kingsford-Smith
Street, application site on left
(April 2017)



Photo 4
View to NE along Kingsford-Smith
Street, application site on right
(April 2017)



Photo 5
View to E along Lyall Parade, application site on left
(April 2017)



Photo 6
View to E along Lyall Parade, application site on left
(April 2017)

ANNEXURE B: EXISTING TRAFFIC VOLUMES

