



10 December 2024

Waimakariri District Council Hearings Panel  
C/- Waimakariri District Council  
Private Bag 1005  
Rangiora

Dear Sir / Madam

**HEARING STREAM 12C – SUBMITTERS 123, 135, 137, 138, 139, 140 & 141**

I am writing to you regarding procedural and reporting concerns with regards to submissions 123, 135, 137, 138, 139, 140 and 141 on the Proposed Waimakariri District Plan. This group of submitters have sought the rezoning of their properties in the Ashley Village area, adjoining Fawcetts and Boundary Roads. The submissions have been considered as part of Hearing Stream 12C.

It is recognised that this letter and attached information does not align with the timetables and minutes issued by the Hearings Panel but unfortunately the submitters has been placed in an unenviable position by Council such that this letter has become necessary.

As per above, the submissions were lodged regarding the rezoning of a cluster of nine properties in the Ashley Village area. You might recall these submissions as they were unique in that they reflected detailed consultation with Council and included multiple reports prepared and undertaken prior to the notification of the Proposed Plan. The reporting planner, Mr Buckley recommended that the submissions be rejected despite the previous efforts undertaken.

Updated information and amendments were provided as part of the hearing evidence and Mr Buckley also proposed in his memorandum to the Hearings Panel dated 9 September 2024 that expert conferencing should occur. At that time discussions with Council had already commenced. A meeting was held between myself and Mr Buckley on 23 August 2024. The purpose of the meeting was to discuss those matters outstanding.

At that meeting Mr Buckley advised that he considered that amendments were required, particularly regarding access arrangements to the area and in response to a number of matters it was requested that the opinion of technical staff within Council was obtained regarding various points. Unfortunately, the meeting was fractured and included Mr Buckley rapidly departing the meeting in an agitated manner and my submitting a complaint with Mr Buckley's manager. A copy of my record of the meeting is available upon request.

Since that time there have been delays in obtaining email responses from Council and some questions have remained unanswered. No further meetings have been held, there have been concerns with points raised and, concerns remain regarding whether technical assistance was obtained by Council in addressing particular points. Requested meetings have not been responded to.

Ultimately the wording of Mr Buckley's memorandum to the Panel was that conferencing would occur. Such conferencing has been limited at best. It was also anticipated that, as part of any conferencing, some form of joint statement would be prepared and submitted to the Hearings Panel to reflect further discussions, refinements and potentially amendments to

the proposal. Upon asking as to whether a joint statement would be prepared, Mr Buckley advised this would not be the case and has instead only submitted his brief comments in his closing reply. The submitters have been left in a position whereby they have effectively been given no opportunity to state their opinion as to the matters raised. On this basis this letter has been prepared to both express concerns with the process taken by Council and to at least have the opportunity to provide a response to the matters raised by Mr Buckley in his closing reply.

It is recognised that this letter places the Panel in a difficult position but at the very least it is requested that the Panel consider the below as part of their deliberations as to the approval or refusal of the submissions. We are also happy to provide further assistance as required.

### **Closing Reply**

In his closing reply, Mr Buckley has identified a series of positive points regarding the proposed rezoning, and these are supported. With regards to negatives he has advised as per below (shown in italics). We include comment as to those points identified as negative.

*The following criteria are negatives for the proposed rezoning of the property:*

- *It is proposed to allow separate properties to develop independent of each other,*
  - o *This would result in poor integration with proposed internal road,*
    - *This would lead to greater number of right of way connections onto a strategic road (Appendix 5 assessment around access onto Fawcetts Road),*
  - o *Piece meal development will lead to poor integration across roading, stormwater, water supply and wastewater reticulation,*
    - *Unless coordinated there is potential for all nine properties having their own separate sewer main connecting into the Cones Road pumpstation,*

In consideration of the above points, it is recognised that the land in question is held as a group of individual properties, being nine properties in total. To date the group of landowners has worked together in seeking a change in zoning and there is also an awareness of the need to continue to work together. This is balanced with the fact that some landowners will wish to move faster than others in developing their properties. This is much the same as a typical staged subdivision.

At the August meeting with Mr Buckley, he expressed the opinion that the design of the development should treat the area in question as a single property with no regard to individual properties and existing buildings on the properties. This would seem to reflect his above comments regarding piecemeal development.

The question of road connections is discussed later in this letter but in general terms efforts have been made to provide a balance whereby properties can be developed individually while ensuring adequate provision for services, infrastructure and transport connections.

As part of previously submitted evidence, the submitters have proposed provisions requiring the provision of reticulated water and wastewater services. The development of individual reticulated networks, as per Mr Buckley's proposition, is considered to be unlikely and cost prohibitive. It is also recognised that no evidence from the Council Engineering team has expressed these concerns, only Mr Buckley.

In order to establish appropriate reticulated wastewater and water infrastructure connections the submitters will need to work with the Council engineering teams. This will also be necessary because other areas also propose to establish connections to the Council reticulated network on Cones Road, such as the Ashley Village settlement proposal which

Mr Buckley recommends be approved. Evidence previously submitted to the Hearings Panel in support of the proposed rezoning included rules requiring connections to reticulated networks. In order to address the concerns of Mr Buckley, and to provide increased surety regarding this issue it is now proposed to insert an additional rule that requires an agreed arrangement with Council be established with Council prior to any subdivision being able to commence. This provision would apply for wastewater, water supply and stormwater.

It has already been confirmed that the area sought to be rezoned can be adequately serviced, there is no disagreement between parties regarding this. Given the nature of the proposed zoning, there is a natural or commonsense process that landowners will continue to work together in order to manage costs but to provide Council and the Panel with additional reassurance, additional rules are proposed to address this. These changes to rules are tracked in the attached suite of Proposed Plan provisions.

- *Stormwater management area design and sizing,*
  - o *Noting that the ODP has shown an increase in sizing and some preliminary design calculations has been undertaken (Appendix 7),*
  - o *There is likely to be poor integration with stormwater network and may result in flooding issues on downstream properties if the piecemeal development approach is allowed,*

in his closing reply Mr Buckley has provided comment from the Council which confirms that stormwater can be suitably managed. This was attached as Appendix 7 to his closing reply. I also note that the calculations are very conservative in that they are based on stormwater basins being required whereas it is also proposed to establish a requirement for rainwater collection tanks and onsite water disposal where possible. It is entirely possible that onsite water disposal can occur within the area proposed to be rezoned, on the basis that the existing dwellings across the area have on site disposal, however a very conservative approach has been taken.

The original report submitted as part of the submission, the evidence provided to the Panel and the memorandum of the Council Engineer in the closing reply do not express concerns regarding downstream flood effects. Mr Buckley has suggested that there could be downstream flooding effects. No technical evidence has been provided by any qualified person that suggests there are potentially flooding issues for downstream properties and it is respectfully suggested that it is irresponsible to suggest as such, unless you have the necessary qualifications and expertise.

Mr Buckley appears to again be focused on the multiple properties involved with the rezoning sought. While Mr Buckley has provided statements that are not technically supported, as per above, the submitters are agreeable to have it recorded as a rule that a detailed design for stormwater shall be prepared for the group of properties and that the design shall be implemented as each catchment area is developed. The changes for this are tracked in the attached document. The proposed amendments to rules includes changes to the current proposed rules to include greater specificity, including a minimum size for water tank collection and to prioritise on site stormwater disposal where possible.

- *Consideration of possible traffic safety issue onto Fawcetts Road ,*
  - o *As stated above, multiple right of way access onto a strategic road is not transport safety outcome,*
  - o *While commenting on the proximity to the school, no provision has been given for pedestrian access within the development to the school,*

Mr Buckley has provided comment prepared by Mr Binder, which comments on traffic related matters. This is Appendix 5 in the closing reply. It is understood that Mr Buckley and Mr

Bacon have met with Mr Binder on more than one occasion to discuss the question of traffic related effects. No invitation was extended to the submitters or their representatives to attend these meetings and likewise a meeting was requested with the three parties to which no response was received.

It is respectfully suggested that there are differences in opinion between Mr Buckley and Mr Binder. When I met with Mr Buckley in August he expressed the opinion that there should be no direct access to Fawcetts Road from individual properties. It was his opinion that all properties should only gain access from a new internal road network. This includes that existing dwellings should gain access via the new internal road network.

The opinion of Mr Binder is different from that of Mr Buckley. The memorandum prepared by Mr Binder provides the opinion that the number of vehicle crossings should be limited, as should the number of allotments served by the crossings. This is inherently different from the stated opinion of Mr Buckley. Mr Binder is not opposed to rights of way and instead seeks controls as to the number of vehicle crossings and the number of allotments served.

The submitters, have prepared a design which reduces the number of vehicle crossings, compared to the existing number of crossings, as acknowledged by Mr Binder. The applicant also amended the proposal to reduce the number of allotments served. On the basis of more recent discussions the submitters have attempted to further reduce this number. This is reflected in the updated suite of rules as attached to this letter.

The submitters have attempted to provide a design which aligns with the opinion of Mr Binder as much as possible, the number of crossings have been reduced, as have the number of allotments served. In support of this approach the applicants have obtained comment from a traffic engineer and a report is attached confirming that the proposed arrangement is appropriate.

We are therefore left in a position that the recommendation of Mr Buckley more accurately reflects his own personal opinion as opposed to that of the qualified traffic engineer. In addition, there are concerns that the assessments and comments provided by Council do not reflect the existing environment. This includes that there is a school close by that includes speed control signs operating between certain times, the variety of vehicle crossings on the opposite side of Fawcetts Road and that in October last year the Council released a draft speed management plan proposing permanent speed reductions in close proximity to the school.

The applicant has proposed significant measures to reduce the number of direct vehicle crossings on to Fawcetts Road and the number of allotments accessed. Submitters are also concerned that a strong stance is being undertaken for one side of the road, but not the other. It is understood that the Proposed Plan will be implementing zone provisions that are likely to enable further subdivision and allotments with direct access to Fawcetts Road on the opposite side of the road from the area in question.

With regards to the question of access to the school, this was previously discussed in section 8 of my evidence provided to the Hearings Panel. The submitters are open to enable connections to the school and, as previously noted, this was why the shape of the internal roadway was curved, to join closer to Boundary Road nearer the school. Potentially, existing rules in the Proposed Plan may already require the formation of footpaths however to ensure this is the case the submitters are also comfortable with the inclusion of a requirement that a footpath is required between where the internal road connects to Boundary Road and the school. This rule is also tracked in the attached document.

### **Summary**

The above provides a summary of the negative points raised by Mr Buckley and responds to those points. It is considered that the above solutions could have been determined should expert conferencing have occurred. There is also the concern that because the area of land is in multiple ownerships this has been regarded as a negative influence on the rezoning of the requested area.

### **Other Matters**

In addition to the above, and to assist the Hearings Panel, other minor amendments have been incorporated into the attached proposed provisions. This includes:

- The transmission line corridor has been marked in colours consistent with other Proposed Plan Outline Development Plans;
- The built form standard regarding vegetation has been removed as it does not address a specific effect associated with the submission area and would be difficult to be applied; and
- Minor amendments to wording and application status have been undertaken to better align with other Proposed Plan provisions.

### **Conclusion**

It is unfortunate that meaningful conferencing did not occur between the Council and submitters and generally that the early efforts made with Council did not result in a more positive situation. Generally, it is considered that most, possibly all of the above points, could have been resolved and this letter would not have had to be sent to the Hearings Panel.

The decision to send this letter to the Panel has not been made lightly and it is appreciated that it places the Panel in a difficult position as to how to proceed regarding this matter. As such we will abide by any determination the Panel may elect to make regarding how to treat this issue but if further information or responses are required, please do not hesitate to get in contact.

Thank you for your consideration of the above and attached.

Kind regards







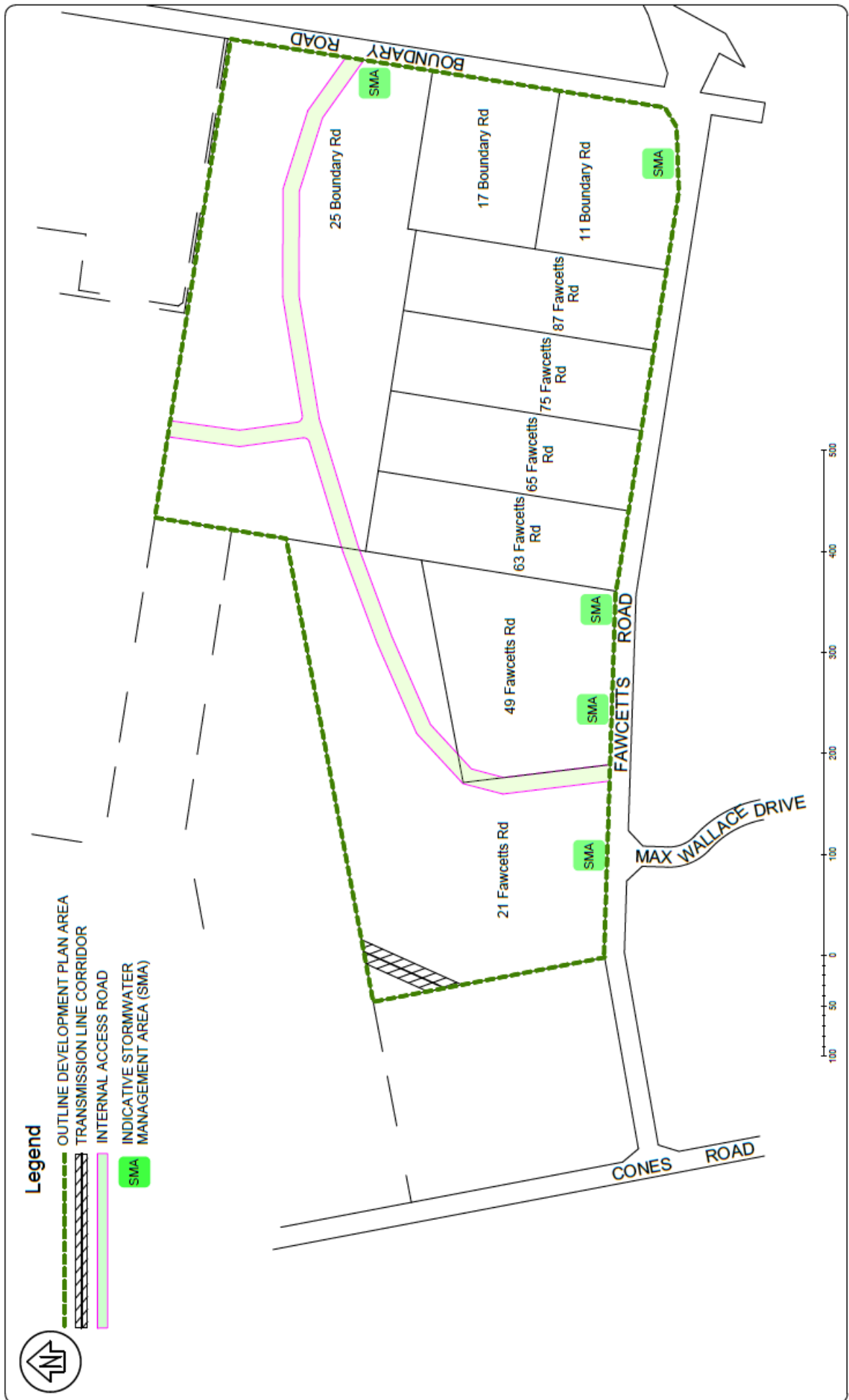
Stewart Fletcher  
**CONSULTANT PLANNER**

# **APPENDIX 1: Updated ODP**



**Legend**

-  OUTLINE DEVELOPMENT PLAN AREA
-  TRANSMISSION LINE CORRIDOR
-  INTERNAL ACCESS ROAD
-  INDICATIVE STORMWATER MANAGEMENT AREA (SMA)



## **APPENDIX 2: Proposed Rules**



# ADA – Ashley Development Area

## Introduction

The Ashley Development Area is located to the north of Fawcetts Road and to the west of Boundary Road. National Grid transmission lines run across the northwest corner of the development area. The area is zoned for Large Lot Residential Development and the applicable provisions of the Waimakariri District Plan apply.

The [DEV-ADA-APP1](#) area includes:

- Transport connections from Fawcetts Road through the site to Boundary Road and future roading connections to properties to the north of the development area; and
- Identification of existing National Grid Transmission Lines which pass across the northwest corner of the development area.
- Identification of indicative Stormwater Management Areas.

## Activity Rules

### DEV-ADA-R1 Ashley Development Area Outline Development Plan

**Activity status: PER**

**Activity status when compliance not achieved: DIS**

Where:

1. development shall be in accordance with [DEV-ADA-APP1](#).

### Advisory Note

- For the avoidance of doubt, the purpose of the ODP is to facilitate the establishment of a transport network through the site and appropriate [servicing, including](#) stormwater management. All other provisions of the District Plan remain applicable except where an Activity or Built Form Standard is in conflict with this ODP, the ODP shall substitute the provision.

## Built Form Standards

## Activity Rules

### DEV-ADA-BFS1 Vehicular Access

1. [At such a time as the internal local road connection to Boundary Road is formed and](#)

**Activity status when compliance not achieved: DIS**

established, a formed 1.8 metre wide gravel pathway shall be established on the western side of Boundary Road to provide a pedestrian connection to Ashley Rakahuri School.

2. Vehicular access from Fawcetts Road (excluding via the internal local access road) shall be limited as to the number of vehicle crossings and number of allotments served as follows:

- (a) 21 Fawcetts Road shall include no more than one vehicle crossing, providing access to no more than two residential allotments.

- (b) 49 Fawcetts Road shall include no more than one vehicle crossing providing access to no more than one residential allotment.

- (c) 63 Fawcetts Road shall include no more than one vehicle crossing which shall be located directly on the eastern boundary of the property and shared with 65 Fawcetts Road. The vehicle crossing shall provide access to no more than two ~~three~~ residential allotments on the property.

- (d) 65 Fawcetts Road shall include no more than one vehicle crossing which shall be located directly on the western boundary of the property and shared with 63 Fawcetts Road. The

vehicle crossing shall provide access to no more than ~~two~~ **three** residential allotments on the property.

(e) 75 Fawcetts Road shall include no more than one vehicle crossing which shall be located directly on the eastern boundary of the property and shared with 87 Fawcetts Road. The vehicle crossing shall provide access to no more than ~~two~~ **three** residential allotments on the property.

(f) 87 Fawcetts Road shall include no more than one vehicle crossing which shall be located directly on the western boundary of the property and shared with 75 Fawcetts Road. The vehicle crossing shall provide access to no more than three residential allotments on the property.

(g) 11 Boundary Road shall have no direct vehicular access to Fawcetts Road. All vehicular access shall be via Boundary Road.

#### DEV-ADA-BFS2 Reticulated Services

1. No subdivision of any properties within the Outline Development Area shall be applied for, or approved, until such a time as a design for reticulated services, to service the Outline Plan area, is submitted to and approved by Council.

Activity status when compliance not achieved: **DISNC**

2. All residential allotments within the Outline Development Plan area must have connections to Council managed reticulated water and wastewater systems.

### DEV-ADA-BFS3 Stormwater

1. No subdivision of any properties within the Outline Development Area shall be applied for, or approved, until such a time as a design for stormwater disposal to service the Outline Plan area is submitted to and approved by Council.
2. Any building erected on an allotment shall include provision for on-site stormwater disposal where this has been identified as required in the Council approved stormwater plan for the Outline Plan area, as required in Built Form Standard DEV-ADA-BFS3.1.
3. All residential dwelling allotments must include roof water collection tanks with a minimum capacity of 5,000 litres.
- ~~4. and where possible, on-site stormwater disposal.~~
- ~~5. All residential allotments must also include an available connection to the relevant stormwater management system~~
4. Any building erected on an allotment shall include provision for off-site stormwater disposal where this has been identified as required in the Council approved stormwater plan for the

**Activity status when compliance not achieved: DIS**

Outline Plan area, as required in Built Form Standard DEV-ADA-BFS3.1.

#### **DEV-ADA-BFS4 Transmission Lines**

1. Any subdivision or land use must comply with those provisions of the Waimakariri District Plan which relate to National Grid Transmission Lines including buffers and setbacks.

**Activity status when compliance not achieved: DIS**

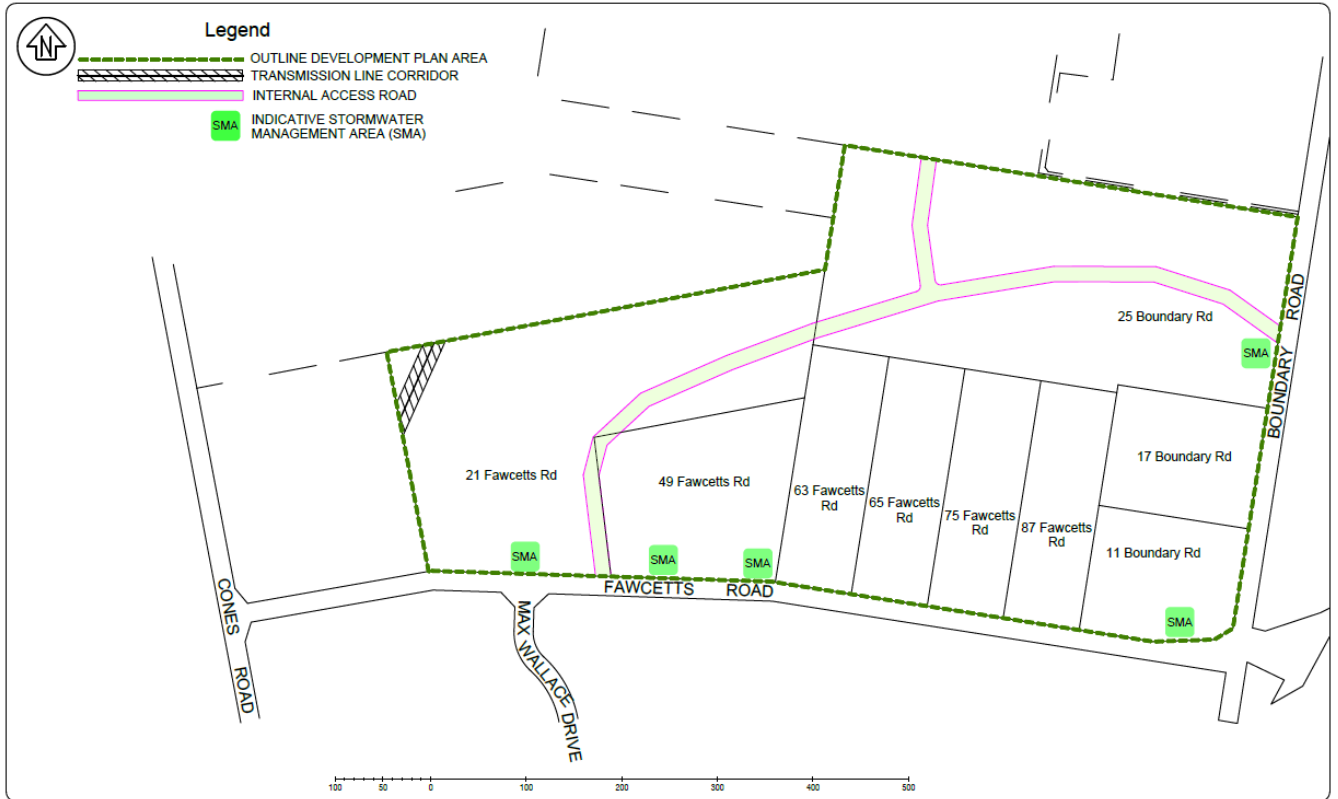
#### **DEV-ADA-BFS5 Vegetation**

- ~~1. The subdivision of any property shall include provision for the establishment of native vegetation plantings to both enhance the amenity of the area and promote ecological enhancement.~~

~~**Activity status when compliance not achieved: DIS**~~

# Appendix

## DEV-ADA-APP1 Ashley ODP



**APPENDIX 3:  
Updated Traffic Engineer Comment**

3 December 2024

Stewart Fletcher  
Fletcher Consulting and Planning  
Sent via email to: [stewart@fletcherconsulting.co.nz](mailto:stewart@fletcherconsulting.co.nz)

## **Fawcetts Road Residential Development, Waimakariri – Access Points Assessment**

Urban Connection Limited (UCL) has been commissioned to conduct a traffic assessment for the proposed residential development on the northwestern corner of the Fawcetts Road/Boundary Road intersection in Ashley, Waimakariri.

A memorandum (DDS 14-05-12.02 / 241007172478) prepared by the Waimakariri District Council outlines recommendations regarding the access point configuration for the proposed development. The document also addresses intersection separation distances and the potential need for road widening on Fawcetts Road.

This assessment aims to review the layout of the proposed access points to and from the site, particularly along Fawcetts Road, which is classified as a Strategic Road. It also addresses other points raised by the Council. A preliminary traffic assessment prepared by UCL in November 2021 provides additional details regarding the proposed development.

### **Access Points**

In order to assess the different access point layouts, four configurations were compared as follows:

- Option 1: Existing configuration
- Option 2: Applicant's Original Layout
- Option 3: Council's Layout Recommendation
- Option 4: Applicant's Updated Proposal

In summary, the Applicant's original layout proposal included seven access points (one road intersection and six rights-of-way) onto Fawcetts Road, with rights-of-way serving up to seven properties. The Council's recommendation seeks to limit the number of access points to four (one road intersection and three rights-of-way), with up to three properties sharing access through rights-of-way.

The Applicant has considered the Council's suggestion and updated its proposal, seeking five access points (one road intersection and four rights-of-way) onto Fawcetts Road, with up to five lots being served by the rights-of-way. A key driver of this proposal is that existing properties within the site retain their entranceway configuration, noting that these residential dwellings have been built taking into account the position of vehicle entrances. For instance, garages for the properties are typically located on the southern side of the building (i.e., where the access is located), and a change in access configuration (to/from the north) would mean that the layout would no longer be fit for purpose.

The four options are presented in Figures 1 to 4 below.





Figure 1: Option 1 – Existing layout/access arrangement on Fawcetts Road



Figure 2: Option 2 – Applicant's original layout proposed Nov 2021

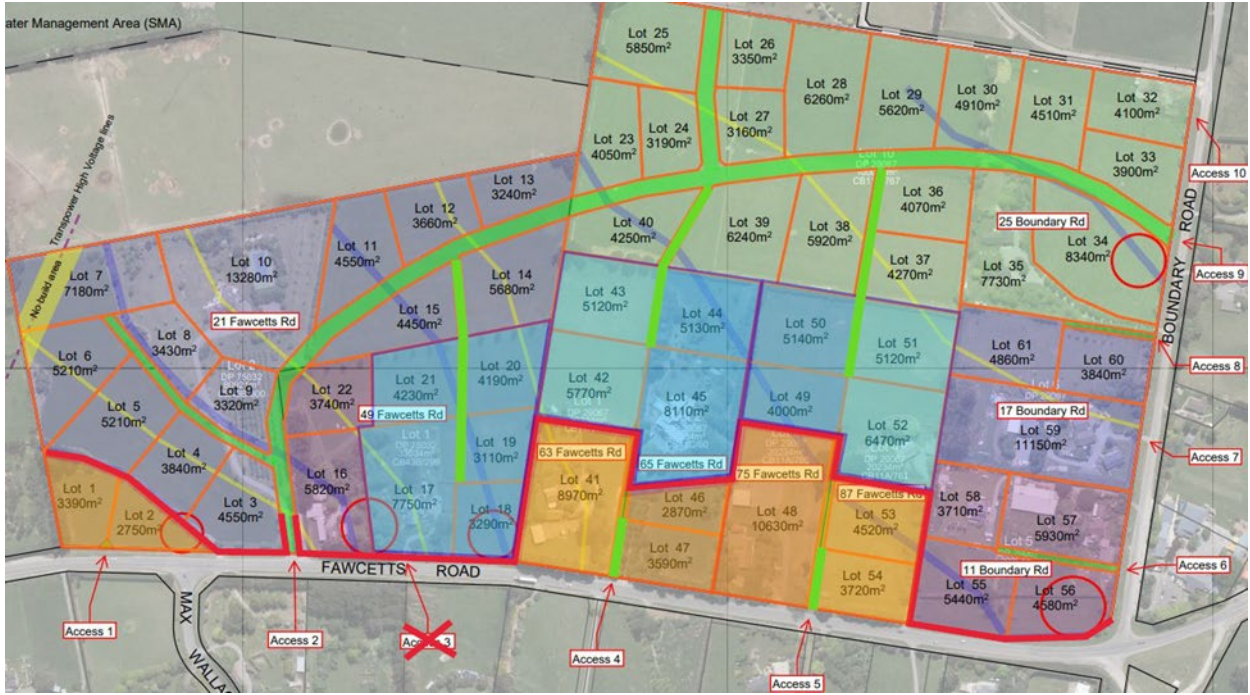


Figure 3: Option 3 – Alternative layout proposed by Council (memo dated 7 October 2024)

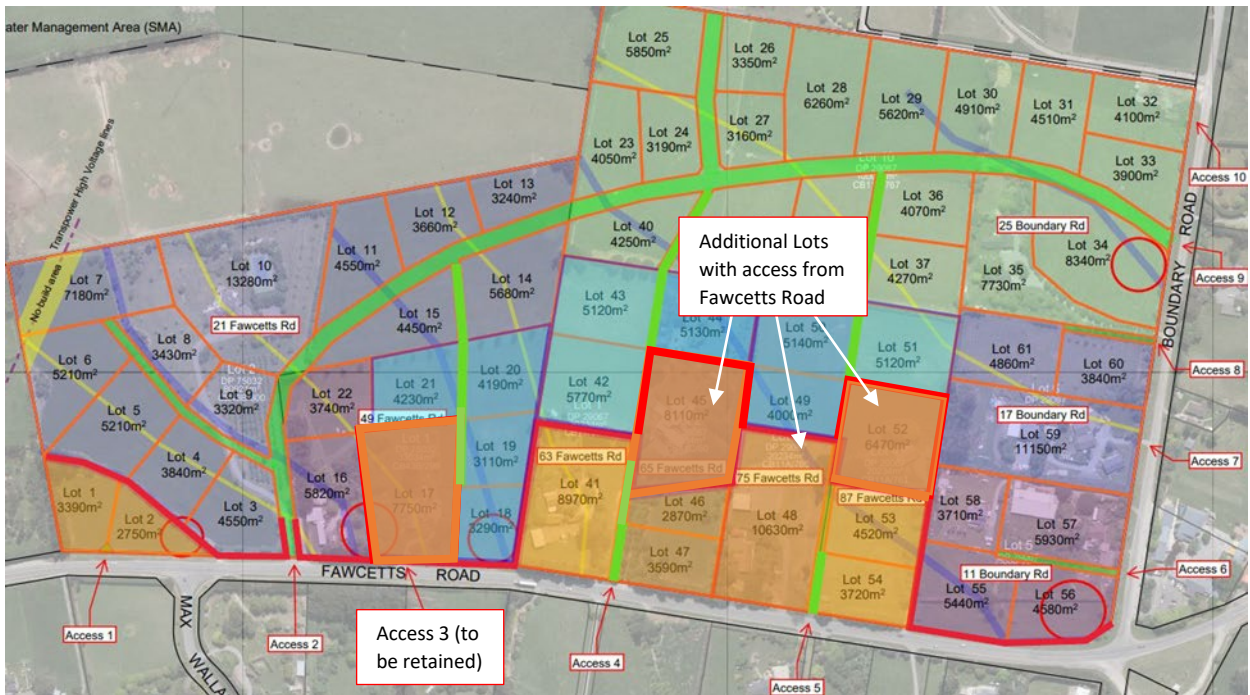


Figure 4: Option 4 – Applicant's updated proposal

Table 1 below provides a comparison of the four options:

Table 1: Access Options Comparison

Description	Option			
	Option1 (Existing)	Option2 (Original)	Option3 (Council's)	Option 4 (Proposed)
Number of access points	9*	6	4	5
Number of lots served per access point**	1	2 to 7	2 to 3	1 to 5
Traffic volume per access point/ROW**	10 vpd	20 to 70 vpd	20 to 30 vpd	10 to 50 vpd
Peak-hour traffic generation per access point/ROW**	1 vph	2 to 8 vph	2 to 4 vph	1 to 6 vph
Total number of dwellings served with direct access to/from Fawcetts Road**	7	21	8	12
Total estimated daily traffic generated directly onto Fawcetts Road**	70 vpd	210 vpd	80 vpd	120 vpd
Total estimated peak-hour traffic generated directly onto Fawcetts Road**	8 vph	25 vph	10 vph	14 vph

\* Includes paddock gates

\*\* Excludes movements from the new road intersection

As shown in the table above, the Applicant's updated proposal (Option 4) is substantially similar to the Council's recommendation (Option 3). It is acknowledged that the Applicant's proposal creates one additional access point onto Fawcetts Road and a modest increase in traffic generation. However, considering the development's scale (approximately 60 lots are to be accommodated), the increase in traffic with direct access to/from Fawcetts Road is relatively minor compared to the existing situation – 8 vph to 14 vph in peak hours or 70 vpd to 120 vpd per day, respectively.

The number of access points with direct access to Fawcetts Road would also be reduced from nine in the existing situation to five under the Applicant's updated proposal. While a relatively modest increase in traffic with direct access to Fawcetts Road can be expected, the rationalisation of access points is expected to outweigh any potential adverse impacts of the increase in traffic.

Therefore, the Applicant's updated proposal represents a practical compromise between the Council's ideal option (Option 3) and the constraints of the existing residential configurations. It achieves RCA's key objectives, including fewer access points and reduced traffic at rights-of-way where feasible.

From a traffic engineering perspective, the proposal is expected to be accommodated within the existing roading environment with less than minor effects. The modest increase in traffic volumes is offset by the benefits of access point rationalisation, ensuring a balanced and functional outcome.

### Intersection Separation Distances

As highlighted in the Council's memorandum, the separation distance between the site's new road intersection and the Max Wallace Drive intersection does not comply with the requirements of the Waimakariri District Plan. The distance between these intersections is approximately 80 m, while the District Plan requires 550 m for an 80 km/h speed limit area.

Separation distances are important as they provide space between turning vehicles, helping to avoid direct conflicts and reducing the observation time between turning vehicles. However, this non-compliance is assessed as less than minor due to the following reasons:

- **Max Wallace Drive is classified as an access/local road.** The daily traffic volume on this road is 210 vpd. In this context, the traffic volume on this road is similar to that of a high-volume driveway (NZTA RTS6) rather than a typical road intersection. It is worth noting that the minimum separation distance between a vehicle crossing and an intersection on a strategic road with a posted speed limit greater than 50 km/h is 75 m.
- **The low traffic volumes on Max Wallace Drive** reduce the likelihood of conflicts due to a decreased chance of simultaneous turning movements occurring at both intersections.
- **A clear line of sight between vehicles turning at each intersection** is expected due to the straight road alignment on Fawcetts Road between these intersections. Vehicles would generally have sufficient time to observe and react to an unlikely conflict with a vehicle turning at the adjacent intersection.
- **Both intersections are T-intersections and are located on opposite sides of Fawcetts Road.** Vehicles are generally expected to signal before turning, and turning movements at one intersection are unlikely to be confused with those at the other. For example, a vehicle turning right onto the new road would be unlikely to confuse this with a turning movement onto Max Wallace Drive.

These combined factors result in a unlikely probability of any traffic conflicts occurring due to the reduced separation distance. Therefore, less than minor adverse effects would be expected to be generated.

### Widening on Fawcetts Road

The Council's memorandum notes that road widening may be required on Fawcetts Road to accommodate rights-of-way. This is likely mentioned due to the potential conflict risk (rear-end crashes) involving vehicles turning right onto rights-of-way and westbound traffic on Fawcetts Road.

Figure 3.25(c) of Austroads Guide to Traffic Management Part 6:2020 provides traffic volume thresholds at which turning treatment (for instance, a right-turn bay) is required from a safety perspective (refer to Figure 4 below).

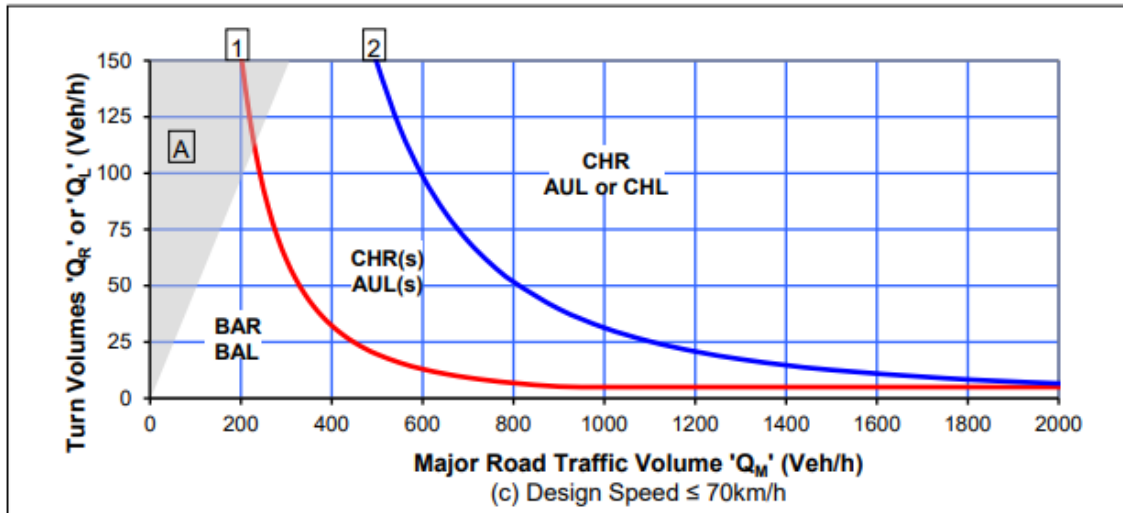


Figure 5: Austroads turning warrants for a design speed of 70 km/h or less (Figure 3.25 Austroads GTM Part 6)

The estimated traffic volume on Fawcetts Road is 6,112 vpd (MobileRoad, 2024). Peak-hour volumes are projected to range from 672 to 978 vph, based on Austroads' daily-to-peak-hour conversion rates of 11-16% for rural areas. In the worst-case scenario (higher peak-hour flows), if traffic volumes on the main road exceed 900 vph, a turning treatment would be required if turning volumes exceed approximately 6 vph.

Peak-hour right-turn movements onto the rights-of-way are expected to range from 1 to 2 vph, depending on the layout (Council's recommendation and the original design, respectively). These low right-turn volumes are mainly due to the directional split, which is expected to generate predominantly westbound trips, resulting in the majority of movements being left turns into the site and right turns out. Therefore, no road widening is deemed necessary to accommodate safe movements at the rights-of-way.

However, right-turn movements from Fawcetts Road at the intersections with Boundary Road and New Road may require specific turning treatments, including road widening, to accommodate the necessary turning facilities. To confirm the need for turning treatments at these locations, it is recommended that peak-hour traffic counts be conducted at the Fawcetts Road/Boundary Road intersection. This survey will help determine the peak-hour traffic flow and the need for a turning treatment.

## Conclusion

In summary, it is concluded that:

- The Applicant's updated layout proposal can be safely supported from a traffic engineering perspective, considering the relatively low traffic generation at rights-of-way and fewer access points compared to the existing situation;
- Less than minor adverse effects would be expected due to the intersection separation distances shortfall between the proposed New Road to the site and Max Wallace Drive;
- No widening on Fawcetts Road is deemed required to accommodate turning movements onto rights-of-way;
- Peak-hour traffic counts are recommended to be undertaken to determine peak-hour traffic flows and the need for turning treatments at the Fawcetts Road/New Road and Fawcetts Road/Boundary Road intersections.

Please feel free to contact the undersigned if you have any questions relating to this matter.

Yours sincerely,



**Matheus Boaretto**

BEng (Civil), GradDipEng (Highways)

**Senior Transport Engineer**

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