Before an Independent Hearing Commissioner at Hurunui District Council

under: the Resource Management Act 1991

in the matter of: application RC210098 for land use consent to install

and operate a Gravity-Based Recreation Activity within

the Conical Hill Reserve, Hanmer Springs

between: Hanmer Springs Thermal Pools & Spa

Applicant

and: Hurunui District Council

Consent Authority

Statement of Evidence of Simon John de Verteuil

Dated: 23 September 2021





STATEMENT OF EVIDENCE OF SIMON JOHN DE VERTEUIL

INTRODUCTION

- 1 My full name is Simon John de Verteuil
- I am a Senior Transport Engineer at Novo Group Limited and have worked on traffic planning and engineering projects for 18 years. My experience has largely focussed on development planning and includes the preparation and peer review of Traffic and Transport Assessments associated with resource consent applications.
- My qualifications include a Bachelor of Science (BSc) from Newcastle University and a Master of Geographical Information Science (MSc) from Nottingham University. I am an Incorporated Engineer (IEng) with the Institution of Civil Engineers in the UK (MICE) and a Chartered Engineer Technologist with Engineering New Zealand.
- I prepared the Parking Assessment that was undertaken following submission of the original application. This was provided as part of the amended application that was lodged in June 2021.

CODE OF CONDUCT

Although these proceedings are not before the Environment Court, I have read the Environment Court's Code of Conduct for Expert Witnesses in its Environment Court Practice Note 2014 and I agree to comply with it as if these proceedings were before the Court. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 6 My evidence is presented on behalf of the applicant, Hanmer Springs Thermal Pools & Spa.
- 7 It addresses the parking related matters associated with the Gravity-Based Recreation Activity (referred to as the 'activity') within the Conical Hill Reserve, and is structured as follows:
 - 7.1 Executive Summary;
 - 7.2 The Proposal;
 - 7.3 Summary of the Parking Assessment;
 - 7.4 Response to Submitters' Concerns;

- 7.5 Response to Section 42a Report;
- 7.6 Conclusion.
- In preparing my evidence I have relied on and reviewed the following documents:
 - (a) My original Parking Assessment report;
 - (b) The Council's Section 42a Report;
 - (c) Submissions received (55 in total);
 - (d) Mr Graeme Abbot's evidence, in particular his discussion of anticipated operational aspects.

EXECUTIVE SUMMARY

- 9 A peak hourly ridership demand of 60 for the activity is expected to translate into a kerbside parking demand of 23-34 vehicles. With a surplus supply of at least 67 on-street available parking spaces, there is sufficient space available to accommodate this projected peak demand.
- 10 The Council's traffic engineer (Mr Smith) for the Council supports the above conclusions and observes that our parking assessment is conservative. Mr Smith however recommends five conditions of consent.
- 11 While I agree with the general thrust of the suggested traffic-related conditions, I consider they can be refined because I do not agree that a pedestrian crossing is necessary as Conical Hill Road will continue to be a low-speed environment with low volumes of traffic and the Conical Hill pedestrians access improvements are already planned to be constructed in 2021/22 as part of Council's Long-Term plan. I have outlined what I consider to be more appropriate/practical conditions below:
 - (a) Monitoring of on street parking associated with the Flyride activity to be undertaken by an independent suitably qualified transportation engineer before the attraction opens (as a baseline) and twice annually for two years after opening, and to coincide with a school or public holiday weekend. The parking survey is to be completed between the hours of 9am-1.00pm (4 hour duration).

Dave Smith, 'Transport Comments on Hanmer Springs 'Flyride' Parking Assessment', dated 15 September 2021 at [18].

- (b) Monitoring should extend to the extent of parking associated with the activity on Acheron Heights.
- (c) Results of monitoring undertaken in relation to conditions a. and b. above shall be provided to the Hurunui District Council within eight weeks of each monitoring period being completed.
- (d) A wayfinding plan shall be prepared and submitted to Council for certification prior to the activity commencing. Any signage required to be installed in accordance with the certified wayfinding plan shall be installed prior to the activity commencing.
- Accordingly, my opinion is that the proposal is supported from a traffic perspective and the effects on the traffic environment are acceptable. This view is shared by the Council's traffic engineer.

THE PROPOSAL

- The proposal is to estabish and operate a ride experience consisting of a cable track system, that runs down Conical Hill through an existing forested area.
- 14 From a transport perspective, the key aspects of the proposal are that:
 - (a) No on-site car parking is proposed. Customers are expected to walk from the centre of the Township, or drive and park, utilising the kerbside resource along some of the local streets.
 - (b) Customers will be promoted to access the activity by using the key point of pedestrian access along Conical Hill Road.
 - (c) Given that there is no on-site car parking spaces there are no District Plan non-compliances relating to aspects such as access widths, queuing, parking dimensions etc.

SUMMARY OF THE PARKING ASSESSMENT

- In my original parking assessment, I outlined the parking related issues as they relate to the proposal.
- 16 My analysis in the original parking assessment concludes:

- (a) A peak hourly ridership demand of 60 is expected to translate into a kerbside parking demand of between 23-34 vehicles.
- (b) An observed surplus supply of at least 67 on-street parking spaces on Conical Hill Road and adjacent road connections, which can easily accommodate the projected parking demand.
- 17 The key aspects of the parking assessment are outlined below.

Existing Environment

- The application site is located within the existing reserve on Conical Hill. The reserve itself already contains walking tracks frequented by the public, which will allow customers to walk to the start of the activity nearer the top of the hill.
- The nearest roads to Conical Hill Reserve that could be used by customers (and the wider public) include Conical Hill Road, which is the main spine road from the Hanmer Springs township, and the associated side roads such as Oregon Heights, Thomas Hanmer Drive, Chalet Crescent and Acheron Heights, as shown in **Figure 1**. The key parking and traffic issues of these roads includes:
 - Conical Hill Road (between Chalet Crescent and Thomas Hanmer Drive): 13.5m carriageway, measured kerb to kerb. This width enables kerbside parking on both sides; and Conical Hill Road (between Thomas Hanmer Drive and Oregon Heights): 7.0m carriageway, measured kerb to kerb. This width enables kerbside parking on one side only.
 - Oregon Heights: 7.0m carriageway with a parking restriction (broken yellow lines) on the southern side. This reduces the effective carriageway width to around 5.0m when the kerbside parking is occupied.
 - Thomas Hanmer Drive: 8.5m carriageway, measured kerb to kerb. This width enables kerbside parking on both sides, although it reduces the effective width to 4.5m.
 - Chalet Crescent: 9.0m carriageway. This reduces the effective carriageway width to around 5.0m when the kerbside parking is occupied.
 - Acheron Heights: 8.0m carriageway. This reduces the effective carriageway width to around 4.0m when the kerbside parking is occupied.



Figure 1: Parking Areas Surveyed (Source: Original Parking Assessment)

Existing Parking Demand

- A peak parking demand survey was conducted on Saturday, 24 April 2021 and coincided with the school holidays and ANZAC day to capture peak trading periods associated with the Hanmer township.
- 21 The key parking demand observations were outlined in the original parking assessment and are replicated below:
 - (a) Oregon Heights Up to 6 vehicles were observed parking out of 13 available spaces. Some parking was related to local properties and some were people parking to access Conical Hill reserve.
 - (b) Thomas Hanmer Drive Up to 1 vehicle observed parking out of 32 available spaces.
 - (c) Conical Hill Road (west side) Up to 4 vehicles observed parking out of 5 available spaces (due to presence of mature trees grown in the road). Most of this parking appeared long term with some short term parking, possibly to gain access to Conical Hill reserve.
 - (d) Conical Hill Road (east side) Up to 9 vehicles observed parking out of 15 available spaces. These were typically visitors accessing the Conical Hill reserve.
 - (e) Chalet Crescent Up to 1 vehicle observed parking out of 22 available spaces.

- (f) Acheron Heights There was little variation in parking demand with a peak of four vehicles recorded over 2.5 hours. This indicates that existing parking demand is driven by local residents, who park long term.
- The minimum spare on-street parking capacity observed was 67 spaces (at 11.30am) across the 3-hour survey period (11:00am-2:00pm). In my opinion, this does not represent an environment that is constrained by existing parking.

Projected Parking Demands

- The maximum riding demand for the activity is projected by the applicant to be 50-60 riders per hour. Additional projection is discussed in Mr Abbot's evidence.²
- 24 Based on the hourly peak demand of 60 riders, the anticipated hourly parking demand is between 23-34 vehicles. This is based on the following assumptions:
 - (a) 50% of users driving and parking on the street.
 - (b) Each vehicle associated with the activity containing two people.
 - (c) Vehicles associated with the activity parking for a total of 90 minutes on the street.
- In my opinion, the parking assumptions listed above are appropriate because:
 - (a) As discussed in Mr Abbot's evidence, the main target customers for the activity are guests to Hanmer Springs Thermal Pools and Spa.³ The applicant expects only a small proportion of customers that have booked online not to be guests at the pool.⁴ Information provided from the applicant indicates that the Hanmer Springs Thermal Pools and Spa recorded an average group size of 2.75 on the weekend in April this year that the parking assessment is based on.⁵ Accordingly, it is expected that groups will often have more than one user and that they will all travel in the one vehicle with more than two occupants.

² At paragraphs 76 to 78.

³ Evidence of Mr Graeme Abbot, at paragraph 75.

⁴ Evidence of Mr Graeme Abbot, at paragraph 75.

⁵ Evidence of Mr Graeme Abbot, at paragraph 78.

- (b) In order to meet a peak hour ride demand of 60, there must be fast rides only with very few tandem rides and it assumes that the equipment is operating at 100% efficiency. Mr Abbot discusses in his evidence that the activity will accommodate between 50 60 rides an hour in the peak hour due to inefficiencies created by human behaviour, absentees and other unexpected delays.⁶
- (c) Hanmer Springs has historically been recognised as a township that is consolidated and pedestrianorientated. From a parking perspective, one of the key issues that differentiates Hanmer Springs from other parts of the District is that there is a high provision and high up-take of kerbside parking. The thermal pools contribute largely to the high parking demand, and this attraction is the town's main "draw-card." The pool's popularity as a tourist destination has also increased the level of other amenities, attractions and services within the township. As many of these businesses have developed, there appears to have been an increasing trend that on-site parking is not always necessary. This reflects the compactness of the town centre which has resulted in many of the land use activities relying on the kerbside parking resource. Therefore, visitors to Hanmer Springs, often park once at their place of stay of residence or park within the centre of Hanmer Springs such as near the thermal pools and then walk between a variety of individual sites rather than relying on dedicated private on-site parking for each individual site.
- If each activity in Hanmer Springs had to provide parking to provide for all its peak parking demand, the township would inevitably be dominated by large areas of asphalt with most of it sitting empty and vacant for the majority of the time. In my opinion, this is not an efficient use of resources.
- 27 The peak parking demand for the activity is projected to be between 23-34 vehicles. With a surplus supply of at least 67 on-street parking spaces, there is sufficient space available to accommodate the peak demand.
- As a sensitivity test, if the percentage of users driving was increased to 75% (from 50%), the hourly parking demand would be 34 vehicles. If the average number of customers per car is less than two and the rider efficiency was lower i.e. between 50 and 60, it

⁶ Evidence of Mr Graeme Abbot, at paragraph 76.

follows, that the metrics used to determine the parking demand are robust.

RESPONSE TO SUBMITTERS' CONCERNS

- A number of submitters have raised traffic and parking as an issue of concern. Broadly these concerns can be paraphrased and summarised into the following categories:
 - (a) Insufficent kerbside parking capacity for the Activity users
 - (b) The parking demand estimate is incorrect
 - (c) The streets with kerbside parking are too narrow for emergency vehicles
 - (d) Activity users will park along private ROWs at Oregon Heights to access the Activity
 - (e) Traffic will be congested
 - (f) The findings in the Traffic Assessment that the use of Acheron Heights is only by 'locals' is speculative
 - (g) Additional traffic will use Lucas Lane
 - (h) Due to the lack of a foot path the families parking in this area [Oregon Heights] have no choice but to walk down the road
 - (i) There will be an impact on safety on the roads
- 30 I address each of these concerns below.

<u>Insufficient kerbside parking capacity for the activity users</u>

- My parking survey was undertaken during a public holiday weekend that coincided with school holidays. In my opinion, this represented a peak period where kerbside parking demand was typically higher than usual. My analysis revealed that there was spare capacity for a further 67 vehicles to park on Conical Hill Road and the various side road connections.
- When the projected parking demand (23-34 vehicles) is assessed against the spare capacity, there is easily sufficient capacity to accommodate this increase.

The parking demand estimate is incorrect

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- In my opinion, a parking demand of 23-34 vehicles is robust, as it takes into consideration the following:
 - (a) The percentage of people that may drive is estimated to be 50-75%. Hanmer is a pedestrian orientated township and the route between the centre of Hanmer and Conical Hill is safe, walkable and attractive. In keeping with the wider pedestrian culture, visitors to Hanmer naturally walk around the township and up to Conical Hill. These are accepted behaviours and are encouraged.
 - (b) The duration of the stay (for car parking purposes) is based on 90 minutes which enables users time to walk to the start station (30 minutes) from where they have parked and for spectators to walk back down to their vehicle when departing. I note that if there are no spectators, 90 minutes will not be required.
 - (c) I have assumed only two users per car, where as the average group size is more akin to 2.75.
 - (d) The peak hourly rider demand of 60 assumes there are tandem riders and that the equipment is working at 100% efficiency. In practice, the activity will accommodate between 50 60 rides an hour in the peak hour.
 - (e) All promotional material associated with online booking will promote Conical Hill Road as the key point of access.
 - (f) Walking to the site (rather than driving) will also be encouraged by the applicant through a mixture of online websites, signage and posters at the Thermal Pools.

The streets with kerbside parking are too narrow for emergency vehicles

The F5-02 GD Designer's Guide – *Firefighting Operations Emergency Vehicle Access Guide* recommends a minimum width of 4.0m is required at the destination in order for there to be "enough room around them for vehicle crews working with firefighting equipment". The minimum access (carriageway) width generally needs to be 3.5m – noting that the maximum legal width of a vehicle on a legal road is 2.6m. Fire appliances are typically 2.5m wide which would provide for a 0.5m buffer on both sides.

- There is sufficient carriageway width for a fire appliance to travel along Oregon Heights, Conical Hill Road, Thomas Hanmer Drive, Chalet Crescent and Acheron Heights when kerbside parking is full a minimum of 3.5m is provided on all of these roads.
- There is space on Conical Hill Road and at the end of Acheron Heights (cul-de-sac head) for a fire truck to park to access Conical Hill if required.
- I note that FENZ (Fire and Emergency New Zealand) have requested an operations procedure (for fire emergencies) to be in place prior to the activity being opened for the public. I agree with this and would support a condition of consent to ensure this occurs. FENZ has not raised any concerns with regards to the existing carriageway widths. However, if it transpires that pinch-points along any of the surrounding roads are not sufficient for emergency vehicle access, then I would be supportive of localised parking restrictions. In my opinion, this should occur irrespective of this application (if it is an issue).

Activity users will park along private ROWs at Oregon Heights to access the Activity

Access to house numbers 5-24 is signposted as a private road. It is illegal to park on a private right-of-way. It is also illegal to park within 1.0m of a vehicle crossing (dropped kerb).

Traffic will be congested

- 39 Several submitters have used the term 'congestion', when discussing Oregon Heights. I suspect this term has been used in reference to selected pinch-points along this road as opposed to congestion in the typical traffic engineering sense which relates to long queues and significant delays usually related to high volumes.
- A peak parking demand of 23-34 vehicles will, on average, generate approximately one vehicle every two minutes during the busiest hour of the day. Given that the activity is booked online for certain timeslots, the arrival rate is anticipated to be consistent. Similarly, this will apply to the departure rate as well. In my opinion, this level of traffic is not likely to result in congestion. It is accepted that some vehicles might on some occasions need to yield to an opposing vehicle, however this can easily occur using passing opportunities created by kerb cutdowns and some general driver courtesy. This is common on many roads throughout New Zealand.
- In conjunction with FENZ comments, I would support any small/localised no-stopping/parking initiatives if that is appropriate.

 As with any roads throughout the district, these need to be assessed and actioned if and where required through general network

- operations procedures. In my opinion, a demand of 23-34 spaces does not necessitate any on-street changes at this time.
- Conical Hill Road is classified as a *local road* in the District Plan. The existing cross section of this road aligns with New Zealand Standard 4404:2004 *Land Development and Subdivision Infrastructure Guide* (Figure E13, Suburban 'live and play' environment with primary access to housing) which includes a 20m road reserve, footpaths and kerbside parking on both sides and two 4.2m wide movement lanes. This type of road can accommodate up to 8,000 vehicles per day. Although classified as a *local road*, Conical Hill Road acts as the main feeder road on the north side of town and is designed to a connector/collector standard. In my opinion Conical Hill Road is sufficiently designed to accommodate the predicted increase in traffic along the road.
- Acheron Heights is a further example. Due to the inconvenience of driving an extra 600-700m, and therefore the low number of vehicles expected to park on Acheron Heights, congestion is not likely. If there is a pinch point, the low volumes of traffic coupled with the parking demand suggests traffic will be able to pass through safely and efficiently without any congestion or nuisance effects.
 - The findings in the Traffic Assessment that the use of Acheron Heights is only by 'locals' is speculative
- In paragraph 48 of my original Parking Assessment I stated: "Onstreet parking by customers is not anticipated along Acheron
 Heights. If there are additional parking demands, these are
 expected to be by local residents and the street is capable of
 accommodating these demands". Although I acknowledge that
 general public access is available, I stand by the thrust of the
 comment because of the following:
 - (a) The location of Acheron Heights is such that it requires an additional 600-700m drive around a meandering road.
 - (b) It is not well signposted (small and against landscaping) or marked on the track for public use (see **Photograph 1**). It is used by the adjacent property for vehicular access to their property. These factors do not promote the walking track as being accessible to the public.



Photograph 1: View from the Cul-de-sac Turning Head along Acheron Heights

(c) The walking track through from Acheron Heights is not inviting to newcomers as there is a 'No Entry' sign placed adjacent and square on to the path (see **Photograph 2**).



Photograph 2: Uninviting Walking Track Due to Lack of Signs, Markings and the Presence of a 'No-Entry' sign.

During the 3-hour parking survey (11:00am-2:00pm) on a busy weekend, I only observed only one pedestrian using the track from Acheron Heights into the reserve. This signified a negligible number of pedestrians using the track. My observations also revealed that

- the person was not associated with a vehicle parked on Acheron Heights.
- Although Acheron Heights could attract some parking, my opinion remains that it would ultimately be more attractive to residents familiar with the area. In my opinion, most users will choose to park on Conical Hill or a side road where there is adequate kerbside parking and closer to the marked and intended entrance.

 Promotional material and information received with online bookings in advance will assist in directing people and/or other vehicles.

Additional traffic will use Lucas Lane

- 47 Lucas Lane runs between Thomas Hanmer Drive and Jacks Pass Road. It is almost 600m from where motorists would park on Thomas Hanmer Drive.
- In my opinion, traffic is very unlikely to drive to the end of Thomas Hanmer Drive and along Lucas Lane using unsealed roads as this potentially involves driving 400-800m further than other available spaces on sealed (less dusty) roads.
 - <u>Due to the lack of a foot path the families parking in this area</u>
 [Oregon Heights] have no choice but to walk down the road
- 49 It is accepted that occupants of vehicles parking on the north side of Oregon Heights would disembark in the road. This is because the footpath is only accessible at the first driveway further to the west. The Council's traffic engineer has suggested pedestrian access improvements be provided along the north side of Oregon Heights. I am supportive of this initiative as this will improve access for pedestrians and provide a footpath of the majority of vehicles parked adjacent to the kerb.

There will be an impact on safety on the roads

- Crash data analysed in my Parking Assessment Report revealed two reported non-injury crashes over the previous five-year period.

 Crash factors for these included intoxication and driver inexperience.

 No crash trends have been identified.
- In my opinion the roading environment between Conical Hill Road and Oregon Heights is not conducive to high speeds due to the forward visibility on the bend being limited when driving.
- There is adequate space for motorists to turn around on Conical Hill. This can occur north of Thomas Hanmer Drive and there are turning heads on both Oregon Heights and Acheron Heights allowing vehicles to turn safely. On Thomas Hanmer Drive, motorists would need to undertake 3-point turns or turn around at the next

intersection if required. Due to the low traffic volumes anticipated along this road, this is not unlikely to compromise the safety or efficiency of the road. Likewise, any traffic parked along Chalet Crescent can also perform a 3-point-turn to turn around.

RESPONSE TO SECTION 42A REPORT

- The Council's traffic engineer had a concern that when the traffic assessment was undertaken, the borders were closed to COVID-19. The applicant has confirmed that international visitors have largely been replaced by New Zealand visitors (as per paragraph 19 of Mr Abbot's evidence).
- The Council's traffic engineer ultimately supports the proposal and considers that the effects are acceptable subject to the following five conditions of consent:
 - (a) Monitoring of on street parking associated with the Flyride activity to be undertaken by an independent suitably qualified transportation engineer before the attraction opens (as a baseline) and twice annually for two years after opening, and to coincide with a school or public holiday weekend. Should the extent of parking activity be substantially greater than that identified in the parking assessment, then Council and the applicant should agree on what constitutes an adverse effect, how this can be mitigated and capture this within the wording of a condition of consent.
 - (b) Monitoring should extend to the extent of parking associated with the activity on Acheron Heights.

 Should parking demand extend to both sides of the corridor such that vehicles potentially impede Emergency and Fire Appliances access then the applicant should work with Council to install No Stopping At All Times (NSAAT) markings on one side of Acheron Heights or agree on other suitable mitigation including the implementation of wayfinding.
 - (c) A formal crossing facility should be installed to provide for safe pedestrian movement across Conical Hill Road on the south side of Thomas Hanmer Drive. The specific location, form and design of the crossing should be agreed and approved by Council. It is recommended that pedestrian improvements to the Conical Hill access be completed prior to the activity opening.
 - (d) It is recommended that pedestrian improvements to the Conical Hill access (programmed to be delivered by

Council in 2021/22 financial year) be completed prior to the Flywire activity being open to the public which will improve the safety and accessibility of Conical Hill for pedestrians.

- (e) It is recommended that a Wayfinding Plan be prepared including signage to encourage the use of the Conical Hill access for Flyride activity visitors, coupled with signage to discourage the use of private accessways, Lucas Lane and Acheron Heights.
- While I agree with the general thrust of the suggested five trafficrelated conditions, I consider they can be refined and (c) and (d) in paragraph 54 above can appropriately be omitted for the following reasons:
 - (a) I agree with the Council's traffic engineer that a crossing would improve pedestrian wellbeing, but I don't see the crossing as being necessary. Conical Hill Road is a low-speed environment with low volumes of traffic and pedestrians have no problems crossing the road. This will continue with the activity operational. If at some point the community board wished to implement a crossing I would support it, but I don't feel one is warranted for this proposal.
 - (b) I understand that improvements to the Conical Hill pedestrians access are included in the Council's Long-Term Plan and are programmed to be constructed for 2021/22. In my view, a condition of consent is not required as we have confidence that it will be constructed. If this occurs after the proposal becomes operational, I consider this as being acceptable as any effects would only be for a short period.
 - (c) I understand that there is a review condition⁷ that enables the 'adverse effects' to be considered and this is addressed in Ms Jane Whyte's Evidence.
- I also note that the Council traffic engineer has helpfully included a District Plan compliance assessment as part of his review. I concur with his assessment.

CONCLUSIONS

57 For the reasons set out above, I am satisfied that the level of parking demand and traffic generation expected from the proposal

⁷ Condition 17.

can be accommodated by the surrounding roads without compromising safety or efficiency.

- 58 While I agree with the general thrust of the suggested traffic-related conditions, I consider they can be refined. I have outlined what I consider to be more appropriate and practical conditions below:
 - (a) Monitoring of on street parking associated with the Flyride activity to be undertaken by an independent suitably qualified transportation engineer before the attraction opens (as a baseline) and twice annually for two years after opening, and to coincide with a school or public holiday weekend. The parking survey is to be completed between the hours of 9am-1.00pm (4 hour duration).
 - (b) Monitoring should extend to the extent of parking associated with the activity on Acheron Heights.
 - (c) Results of monitoring undertaken in relation to conditions a. and b. above shall be provided to the Hurunui District Council within eight weeks of each monitoring period being completed.
 - (d) A wayfinding plan shall be prepared and submitted to Council for certification prior to the activity commencing. Any signage required to be installed in accordance with the certified wayfinding plan shall be installed prior to the activity commencing.
- Accordingly, my opinion is that the proposal is supported from a traffic perspective and the effects on the traffic environment are acceptable. This view is shared by the Council's traffic engineer.

Dated: 23 September 2021

S.J de Vorlois

Simon de Verteuil