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Via NSW Planning Portal

Attn: Kathryn Saunders – Principal Planner

**SECTION 4.56 APPLICATION FOR MODIFICATION OF DA19/0419
PROPOSED RESIDENTIAL AGED CARE FACILITY
5 – 7 FLORIBUNDA AVENUE, GLENMORE PARK (LOT 1 IN DP825553)**

1. INTRODUCTION

Dear Kathryn,

This modification application is made under Section 4.56 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to Penrith City Council on behalf of Principal Healthcare Finance Pty Ltd (the Applicant) in support of amendments to Development Consent **DA19/0419**, which relates to the construction of a 2 storey Residential Aged Care Facility, including 142 beds, an allied health facility, at-grade carparking, earthworks and landscaping at 5 – 7 Floribunda Avenue, Glenmore Park. Approval was granted by the Land and Environment Court of NSW by way of a Section 34 Agreement on 19 May 2020 (Penrith City Council at Principal Healthcare Finance Pty Limited - LEC No. 2019/321826) for the proposed development (refer **Appendix 1**).

This application represents the fourth (4) modification to **DA19/0419**.

The following supporting documentation is provided as part of this application:

- **Appendix 1** Section 34 Agreement (LEC No. 2019/321826)
- **Appendix 2** Architectural Design Statement
- **Appendix 3** Updated Architectural Plans
- **Appendix 4** Traffic Impact Statement

The overall intent of the proposed modification is to seek the addition of companion rooms within the approved development. Companion rooms are best described as residential care facility rooms for two beds to enable couples and the like within the facility to enjoy comfort and privacy. The provision of companion rooms is a common desired element of aged care facilities and will meet the needs of many current and future residents.

2. SITE LOCATION AND CHARACTERISTICS

The subject site is identified as 5 – 7 Floribunda Avenue, Glenmore Park, which is legally described as Lot 1 in DP825553. The subject site exhibits a total area of approximately 10,000m² and has frontage to Floribunda

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Avenue and shares a significant common boundary with the public domain of Rotary Park and the Floribunda Community Centre.



Figure 1. Aerial Map of Site (Source: Nearmap, January 2021)

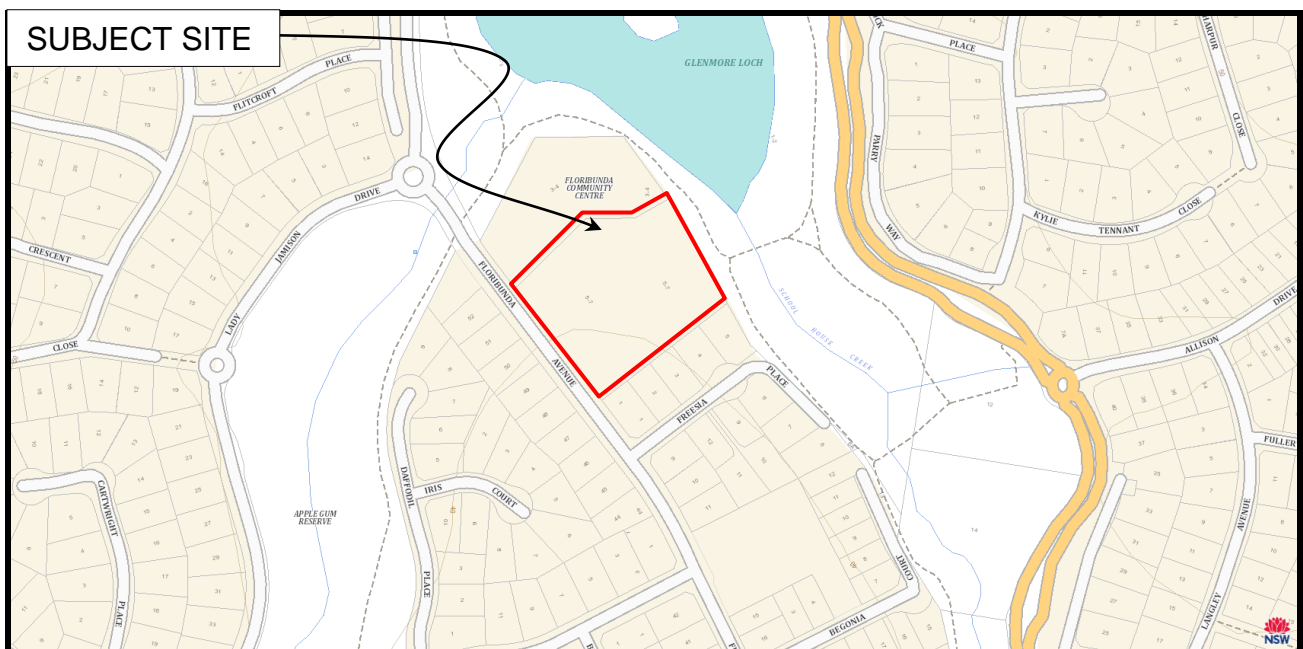


Figure 2. Cadastral Map of Site (Source: SIX Maps, January 2021)

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3. PROPOSED MODIFICATIONS

The proposed modifications comprise of:

- Conversion of twelve (12) approved singles bedrooms to companion rooms within the Lower Ground Floor, Ground Floor and First Floor;
- Reconfiguration of the Wellness Centre resulting in an additional companion room and reduction of one (1) consulting room;
- Addition of one (1) car parking space for residents and visitors; and
- Dilution of landscaped area per residential care facility bed resulting in the approved 30.5m² to 27.8m² per bed.

The proposed changes result in the addition of fourteen (14) beds to the approved 142 bed scheme. The amended development would provide a **total of 156 beds for the facility**.

Specifically, the following changes to the approved development are sought:

- **Lower Ground Floor (Wing A):**

- Conversion of three (3) approved bedrooms for the purpose of companion rooms resulting in three (3) additional beds

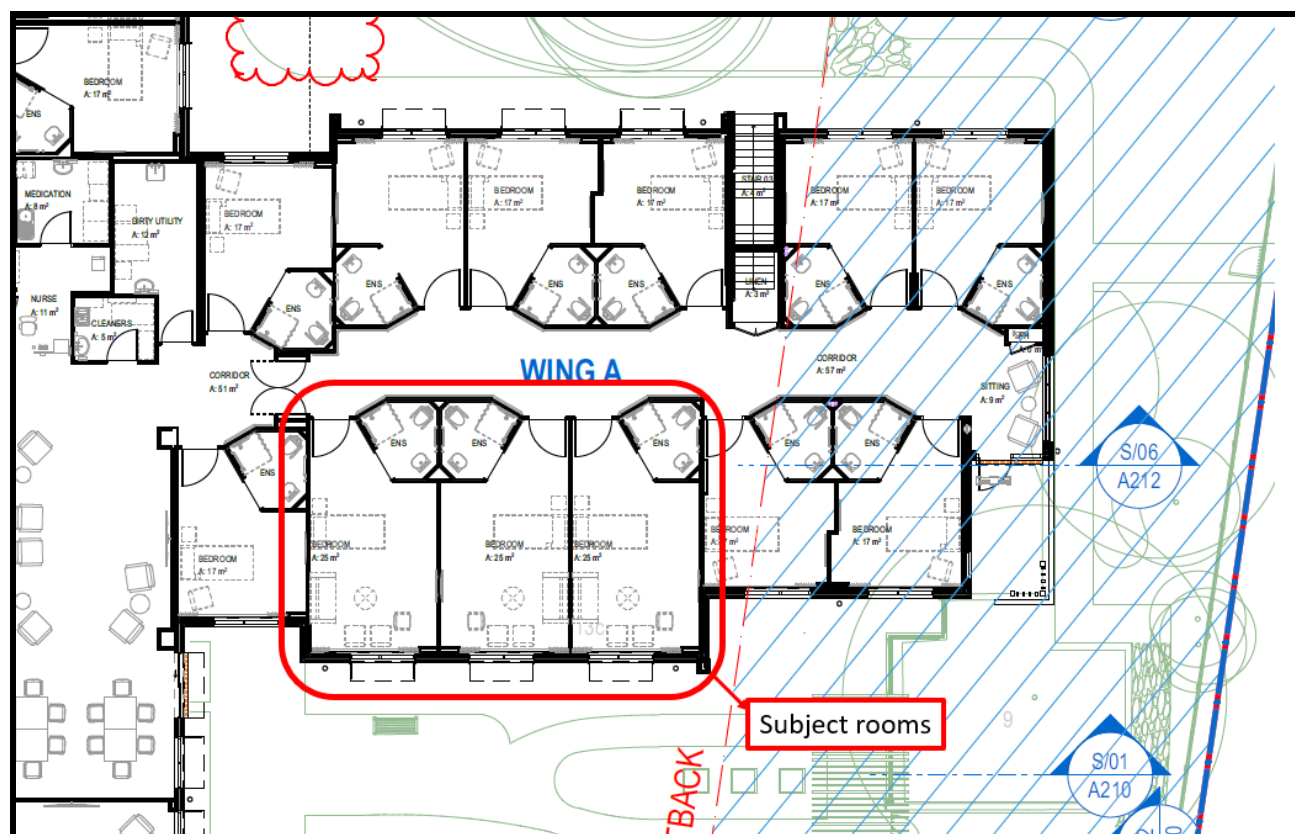


Figure 3. Existing lower ground floor plan (Source: Calder Flower)

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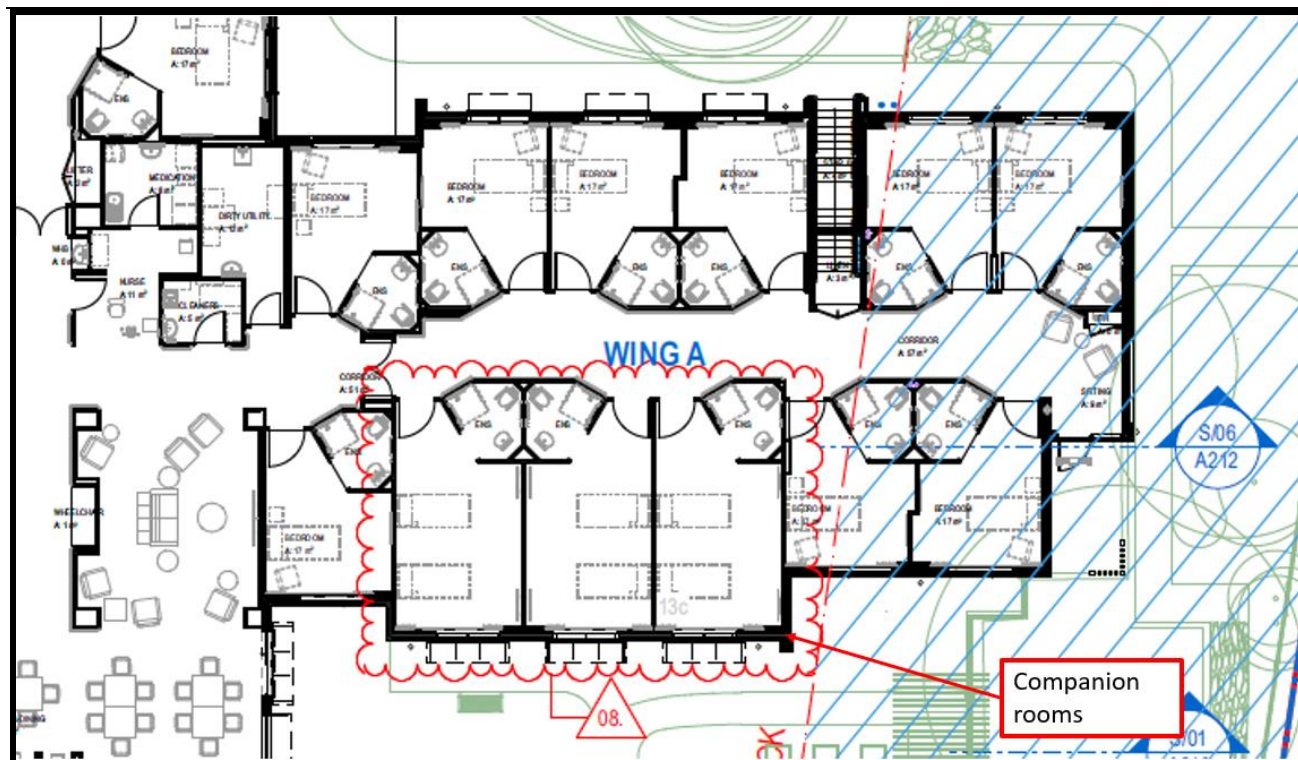


Figure 4. Proposed lower ground floor amendments (Source: Calder Flower)

Ground Floor (Eastern wing):

- Conversion of six (6) approved bedrooms for the purpose of companion rooms resulting in six (6) additional beds; and
- Reconfiguration of Wellness centre layout resulting in the addition of one (1) companion room equating to two (2) additional beds and a reduction from three (3) consult rooms to two (2);

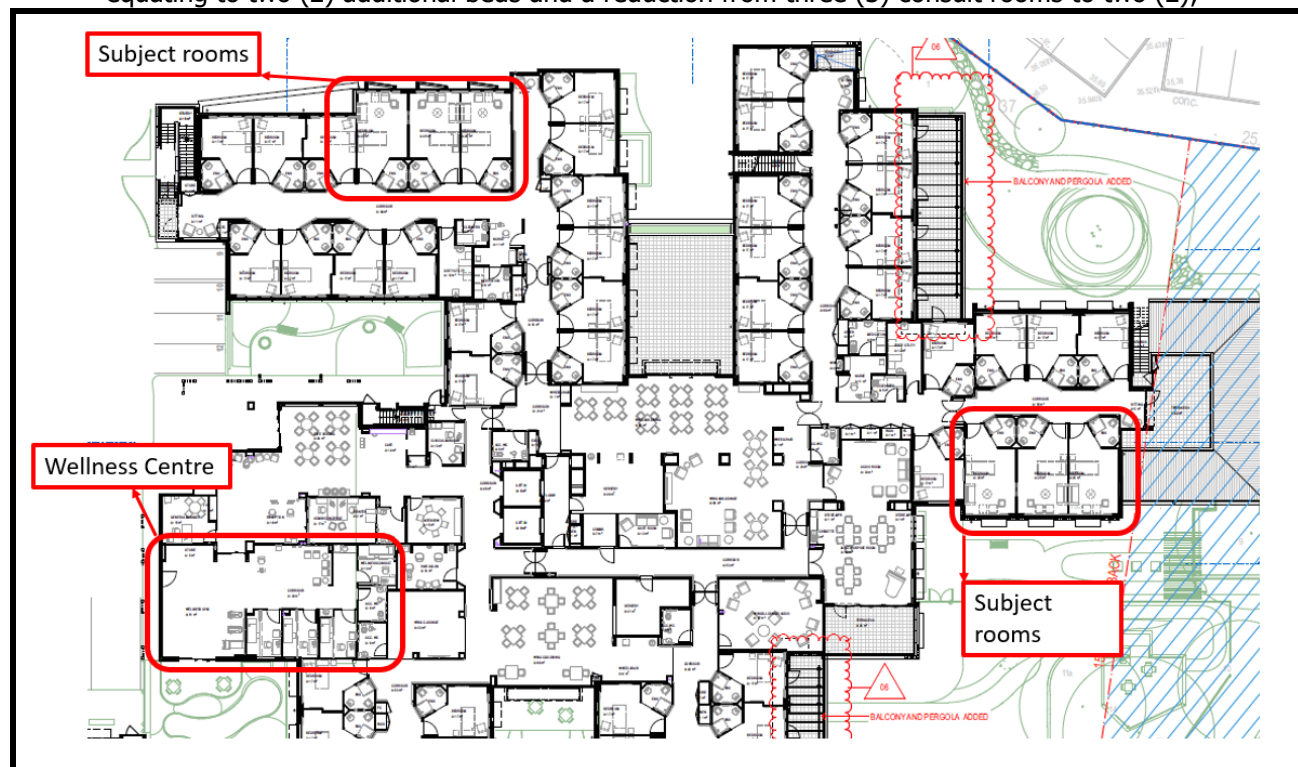


Figure 5. Existing approved ground floor plan (Source: Calder Flower)

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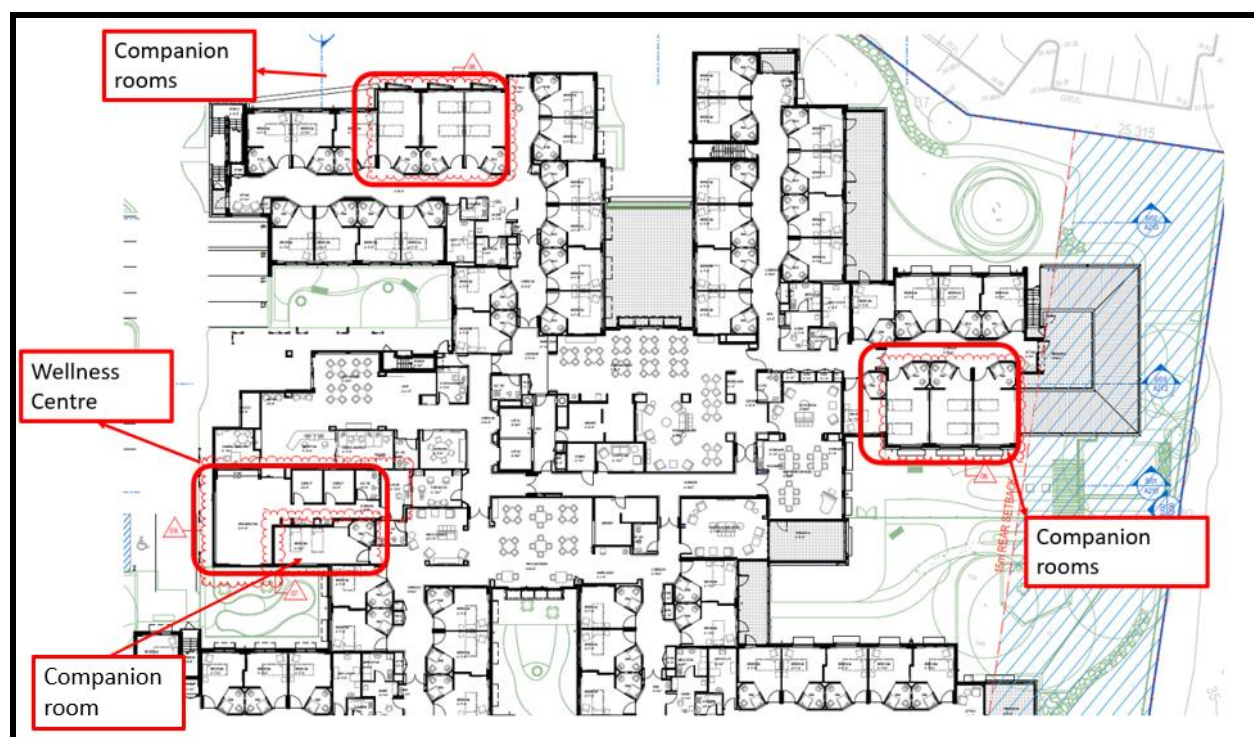


Figure 6: Proposed modifications to ground floor plan (Source: Calder Flower)

• First Floor (Wing A):

- Conversion of three (3) bedrooms for the purposes of companion room resulting in three (3) additional beds.

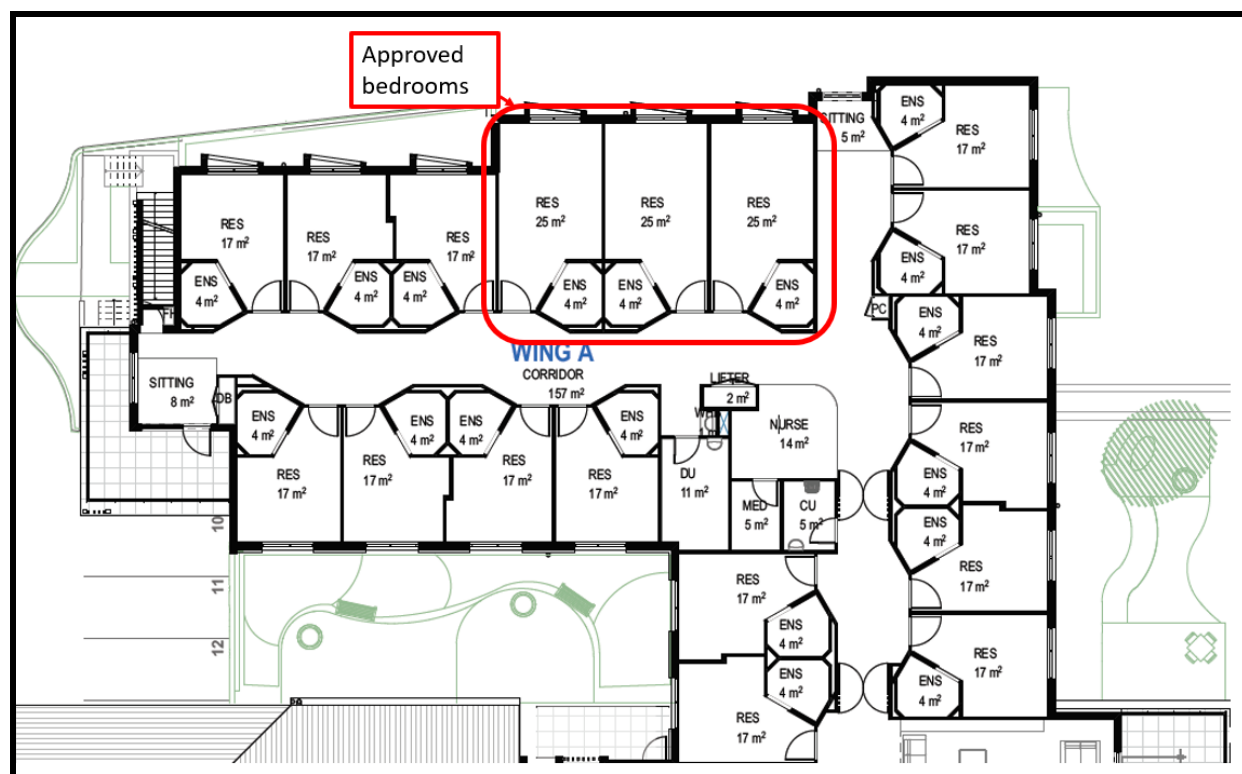


Figure 7: Approved first floor level Wing A (Source: Calder Flower)

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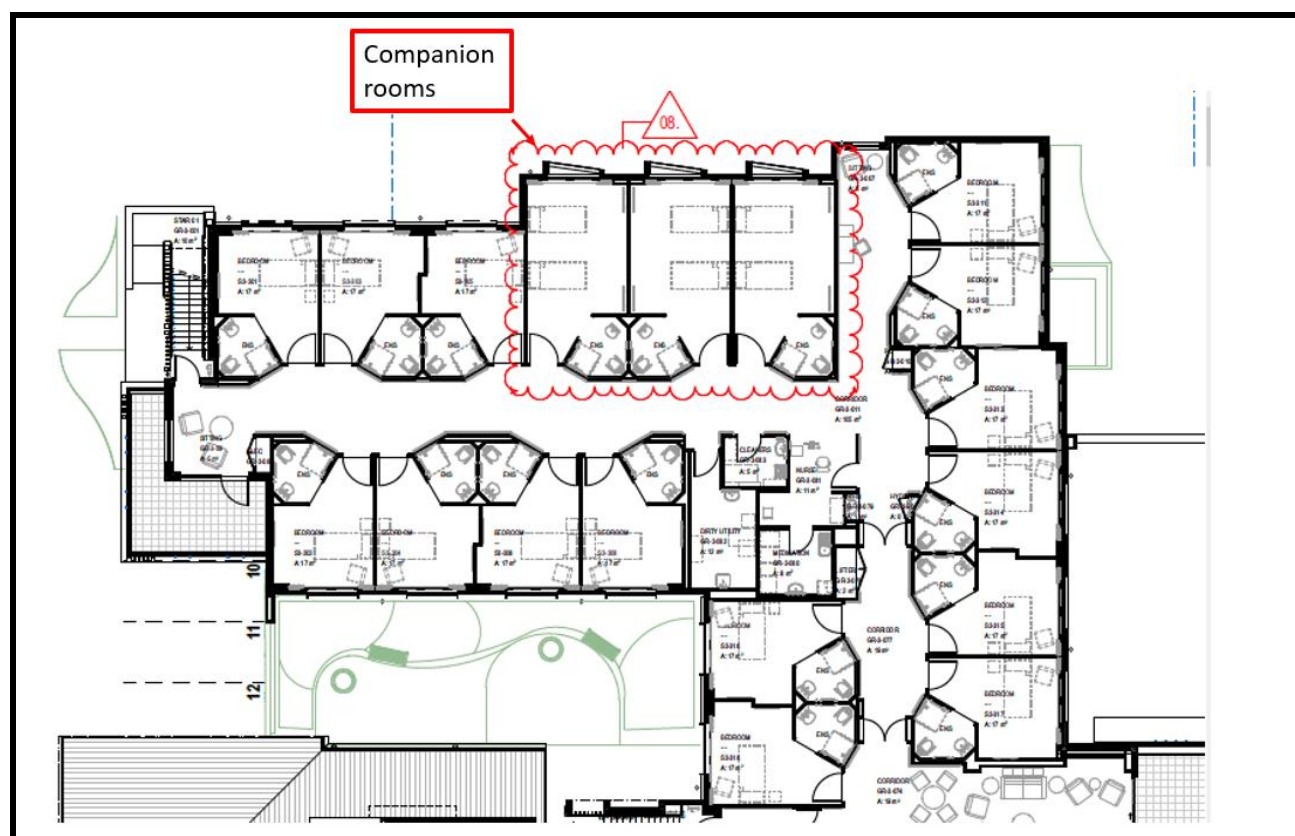


Figure 8: Proposed: First floor level (Source: Calder Flower)

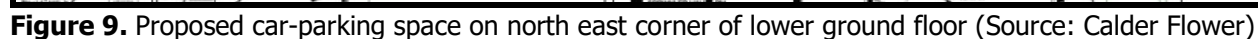
• Traffic and Car-parking:

The modifications will result in the addition of one (1) staff car park space on the lower ground floor (Refer to **Figure 9**). A breakdown of the parking is provided below:

Parking Allied Health – Approved	
3 x Consult Room	5
3 x Consults	3
Total:	8
126 Beds	13 spaces
16 beds (Dementia)	1 space
40 Staff	20 spaces
Subtotal:	34 spaces
Grand Total:	42
Ambulance:	1 space

Parking Allied Health – 4.55(1A)	
2 x Consult Room	4
2 x Consults	2
Total:	6
140 Beds	14 spaces
16 beds (Dementia)	1 space
43 Staff	22 spaces
Subtotal:	37 spaces
Grand Total:	43
Ambulance:	1 space

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The desired development outcome, as outlined above, requires the following modifications to Development Consent **DA19/0419**.

4.1 Amendments to Conditions of Consent

1 The approved development must be carried out substantially in accordance with the following plans and documents except as may be amended by the following conditions.

Plan/Report No.	Description	Prepared by	Revision	Date
A000	Title Page	CalderFlower	B	-
A002	Site Plan	CalderFlower	B	27.02.2020
A003	Demolition Plan	CalderFlower	B	27.02.2020
A100 A100	Lower Ground Floor	CalderFlower	D E	28.08.2020 2/02/21
A101 A101	Ground Floor Plan	CalderFlower	D E	28.08.2020 2/02/21
A102 A102	First Floor Plan	CalderFlower	B C	27.02.2020 2/02/21
A103	Roof Plan	CalderFlower	B	27.02.2020
A200	Elevations	CalderFlower	D	28.08.2020
A210	Sections	CalderFlower	C	28.08.2020
A800	Materials	CalderFlower	B	27.02.2020

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A901	Photomontages	CalderFlower	C	15.04.2020
LA000	Cover Sheet	Taylor Brammer	B	02.03.2020
LA201	Community Courtyard & Native Courtyard	Taylor Brammer	B	02.03.2020
LA202	Wind and Light & look at	Taylor Brammer	B	02.03.2020
LA203	Landscape Terrace	Taylor Brammer	B	02.03.2020
LA204	Dementia Courtyard	Taylor Brammer	B	02.03.2020
LA301	Landscape Sections	Taylor Brammer	B	02.03.2020
LA302	Landscape Section	Taylor Brammer	B	02.03.2020
LA303	Landscape Sections	Taylor Brammer	A	02.03.2020
LA400	Planting Plan & Schedules	Taylor Brammer	B	02.03.2020
LA700	Typical Details	Taylor Brammer	B	02.03.2020
LA200	Landscape Masterplan	Taylor Brammer	D	09.03.2020
LT101	Tree Retention & Removal Plan	Taylor Brammer	P9	22.10.2020
LA600	Finishes Plan	Taylor Brammer	B	09.03.2020
19017	Assessment of Traffic Parking Implications	Transport & Traffic Planning Associates	G	Feb 2020
HH Ref 19117	Civil Engineering Report	Henry & Hymas	4	Feb 2020
191177	Bio Retention Maintenance Plan	Henry & Hymas	-	-
191177	Stormwater Maintenance Plan	Henry & Hymas	-	-
DA_C000	Cover sheet, Drawing schedule, Notes	Henry & Hymas	05	25.02.2020
DA_C100	Ground Floor Plan	Henry & Hymas	11	08.04.2020
DA_C101	Lower Ground Floor Plan	Henry & Hymas	11	06.03.2020
DA_C110	Site Sections	Henry & Hymas	03	06.03.2020
DA_C200	Stormwater Misc. Details & Pit Lid Sched.	Henry & Hymas	05	25.02.2020
DA_C201	Bio-Retention Basin Plan Section & Details	Henry & Hymas	08	08.04.2020
DA_C250	Stormwater Catchment Plan	Henry & Hymas	05	21.02.2020
DA_C500	Pavement Plan	Henry & Hymas	08	25.02.2020
DA_SE01	Sediment & Erosion Control Plan	Henry & Hymas	05	25.02.2020
DA_SE02	Sediment & Erosion Control Typ. Sections & Details	Henry & Hymas	05	25.02.2020

Condition No. 1 of development consent **DA19/0419** is proposed to be amended to reflect the plans modified by this application.

5. STATUTORY PLANNING FRAMEWORK

5.1 Environmental Planning and Assessment Act 1979

The EP&A Act is the principle planning and development legislation in NSW. The modifications sought to Development Consent **DA19/0419** warrants consideration of the provisions of Section 4.56 of the EP&A Act. The provisions of Section 4.56(1) of the EP&A Act have been considered and addressed in **Table 1**.

Table 1: Section 4.56(1) – (1A) Assessment	
Clause	Response

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<i>(1) A consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the Court and subject to and in accordance with the regulations, modify the development consent if—</i>	
<i>(a) it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and</i>	<p>The proposed amendments result in the addition of fourteen (14) beds to approved bedrooms of DA19/0419. The beds are proposed in the rooms to be utilised for the purpose of companion rooms. No changes to the size of the approved bedrooms are sought and the rooms will be designed to accommodate couples and the like with comfort and privacy.</p> <p>The proposed modification will result in no changes to the approved building footprint and comprise only of minor internal reconfigurations. The additional beds will result in minimal changes to staffing and carparking.</p> <p>Section 5.1.1 of this statement demonstrates that the development as modified would result in substantially the same development as the development for which consent was granted under DA19/0419.</p>
<i>(b) it has notified the application in accordance with— (i) the regulations, if the regulations so require, and (ii) a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and</i>	<p>It is understood that the application will be notified in accordance with the <i>Penrith Development Control Plan 2014</i> (PDCP2014).</p>
<i>(c) it has notified, or made reasonable attempts to notify, each person who made a submission in respect of the relevant development application of the proposed modification by sending written notice to the last address known to the consent authority of the objector or other person, and</i>	<p>It is acknowledged that Council must consider any submissions received, concerning the proposed modifications.</p>
<i>(d) it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.</i>	<p>It is acknowledged that Council must consider any submissions received, concerning the proposed modifications.</p>
<i>(1A) In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15(1) as are of relevance to the development the subject of the application. The consent authority must also take into consideration the reasons given by the consent authority for the grant of the consent that is sought to be modified.</i>	<p>The proposed modifications are consistent with the matters referred to in Section 4.15(1) of the EP&A Act.</p> <p>Refer to Section 5.1.2 of this statement.</p>

5.1.1 Section 4.56(1) – Substantially the same

The NSW Land and Environment Court has established several precedents as to what may be considered as being substantially the same development, and what should be factored into the consideration of this threshold test.

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The scope of a maximum modification of a consent without constituting assessment as a standalone application can be analysed through the ambit of *Michael Standley & Associates Pty Ltd v North Sydney Council [2005] NSWLEC 358*, whereupon Commissioner Mason P. found in relation to modification of development consents that the word “modify” was given the ordinary meaning of “to alter without radical transformation”. Therefore, the extent to which a consent may be modified is that to which the consent, as modified, is as approved without radical transformation or alteration.

The development, as modified, is substantially the same development and would not result in a radical transformation of **DA19/0419** for the following reasons:

- The modification retains the approved primary land use as a Residential Aged Care Facility, an allied health facility, at-grade carparking, earthworks and landscaping, and proposes no substantial change to this fundamental element of the approval;
- The addition of companion beds within the development are a common feature among aged care facilities and used by couples for privacy and comfort;
- There are no substantial quantitative changes proposed to the approved building bulk or scale including no changes to the height, gross floor area, or setbacks of the building;
- The function, form, operations and importantly, public perception of the subject site, as a Residential Aged Care Facility, remains unchanged.

In light of the above, the proposal as amended, is not considered to result in a “radical transformation” of the consent, as currently approved, satisfying the radical transformation test pursuant to *Michael Standley & Associates Pty Ltd v North Sydney Council [2005] NSWLEC 358*.

The proposal seeks to include an additional fourteen (14) beds to the development with minimal operational changes. The modifications are not considered radical changes as they remain within the existing approved building footprint and will not result in any environmental impact as outlined by this report. This is further analysed in *Moto Projects (No 2) Pty Ltd v North Sydney Council [1999] NSWLEC 280* which applies a quantitative and qualitative test to determine what qualifies a development as being “substantially the same”.

Moto Projects (No 2) Pty Ltd v North Sydney Council [1999] NSWLEC 280 provides that a comparison of the development as approved, and the development as proposed to be modified. The result of the comparison must be a finding that the modified development is “essentially or materially” the same as the approved development. The comparison involves an appreciation, qualitative, as well as quantitative, of the developments being compared in their proper contexts (including the circumstances in which the development consent was granted).

Whilst it is acknowledged that the proposal does include some quantitative changes, including changes to bed numbers, staff and car parking these are not considered to be substantial as no changes to the built form are proposed. Further, from a qualitative perspective, the development retains its identity as a Residential Aged Care Facility.

Therefore, the proposal, as amended, will be substantially the same development as approved, and satisfies the requirements for the application to be assessed and approved pursuant to Section 4.56(1A) of the EP&A Act.

5.1.2 Section 4.15 – Reasons given by the consent authority for the grant of the consent

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a development application. The relevant matters for consideration under Section 4.15(1) of the EP&A Act are provided in **Table 2** below.

Table 2: Section 4.15(1)(A) Considerations				
Section				Response
Section	4.15(1)(a)(i)	any	environmental	planning
				The proposal as amended is deemed to be

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instrument, and	wholly consistent with the provisions of <i>Penrith Local Environmental Plan 2010</i> (PLEP2010) and <i>State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004</i> (SEPP HSPD).
Section 4.15(1)(a)(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	There are no applicable draft instruments for consideration.
Section 4.15(1)(a)(iii) any development control plan, and	Refer to Section 5.6 of this statement.
Section 4.15(1)(a)(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	There is no Voluntary Planning Agreement (VPA) that applies to the proposal or subject site.
Section 4.15(1)(a)(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	There are no matters prescribed by the regulation that are relevant to the proposal.
Section 4.15(1)(b)-(c)	Refer to Section 6 of this statement.

5.2 Environmental Planning & Assessment Regulation 2000

This application has been prepared in accordance with the provisions of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). Further, the proposed modification does not trigger 'Designated Development' pursuant Schedule 3 of the EP&A Regulation.

5.3 Rural Fires Act 1997

The original proposal was deemed a Special Fire Protection Purpose, and the proposed development triggered Integrated Development under Section 4.46 of the EP&A Act and Section 100B of the *Rural Fires Act 1997*.

A Bushfire Assessment Report was prepared as part of the original DA, and it is considered that no further revision of this report is required for the proposed modification. The recommendations provided within the report, will provide a reasonable and satisfactory level of bushfire protection to the subject proposal as amended, for which the proposed development is considered to be supported on the grounds of anticipated bushfire impacts.

5.4 State Environmental Planning Policies

5.4.1 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The original proposal was submitted pursuant to the provisions of the SEPP HSPD and a Clause 4.6 variation granted to contravene clause 40(4)(c) of the SEPP HSPD. This contravention relates to building height, which would not be altered as part of the proposed modification.

In accordance with Clause 18 of SEPP HSPD, occupation of the additional beds within the companion rooms will be restricted to the following only:

- (a) seniors or people who have a disability,
- (b) people who live within the same household with seniors or people who have a disability,
- (c) staff employed to assist in the administration of and provision of services to housing provided under this Policy

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It is noted that this requirement is also captured by way of a Section 88E under the Conveyancing Act 1919 via a condition of consent pursuant to Clause 18(2). This was suitably imposed by Council via Condition 3 of the parent consent **DA19/0419**. The modifications proposed under this application are consistent with this clause and the additional beds will comply with the above requirements.

Clause 48 of SEPP HSPD provides minimum requirements for Residential care facilities as follows:

- (c) **landscaped area:** *if a minimum of 25 square metres of landscaped area per residential care facility bed is provided,*
- (d) **parking for residents and visitors:** *if at least the following is provided—*
 - (i) *1 parking space for each 10 beds in the residential care facility (or 1 parking space for each 15 beds if the facility provides care only for persons with dementia), and*
 - (ii) *1 parking space for each 2 persons to be employed in connection with the development and on duty at any one time, and*
 - (iii) *1 parking space suitable for an ambulance.*

Under the approval granted by **DA19/0419**, the approved development included 30.50m² per residential care facility bed. The proposed amendments under this application will result in 27.8m² per residential care facility bed and is consistent with the minimum requirements as outlined by the SEPP.

An additional staff car parking space is required to accommodate the additional beds pursuant to Clause 48 (see car-parking breakdown at Section 3 of this report above). The proposed parking amendments to accommodate the additional beds and employees are consistent with this Clause.

Division 2 Design Principles of the SEPP HSPD sets out design outcomes which must be achieved for Seniors housing development. The proposed modifications do not seek to alter any external appearance of the approved development and comprise only of internal reconfiguration. It is also noted that no changes to the sizing of the subject rooms are proposed and the additional beds are only sought within approved rooms to provide a means for couples and the like to share a space in comfort and privacy. Furthermore, Calderflower Architecture has prepared an Architectural Design Statement dated 02 February 2021 (Refer to **Appendix 2**) which concludes that the development, as amended, continues to comply with the principles set out in this Division.

5.5 Penrith Local Environmental Plan 2010

The PLEP2010 is the primary environmental planning instrument that applies to the subject site. The numerical standards approved under PLEP 2010 remain unchanged by the proposed modifications. The relevant provisions of PLEP 2010 as they relate to the subject site are considered below.

5.5.1 Zoning and Permissibility

The proposal, as modified, is consistent with the objectives of the R2 Low Density Residential zone as it will continue to deliver a Residential Aged Care Facility. Given the minor nature of the amendments sought under this application, the proposed modification does not result in any of the objectives of the zone being compromised. The development will continue to achieve these objectives to the same capacity as the Development Consent **DA19/0419**.

5.6 Penrith Development Control Plan 2014

The PDCP2014 supports the PLEP2010 and sets out Penrith City Council's objectives and development controls within the local government area. The development, as amended, does not alter compliance with the PDCP 2014.

The following is a discussion of relevant criteria only:

C10. Traffic, Access and Parking

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The proposed car parking space complies with the requirements of the DCP. It is noted a number of options were explored regarding the location of the proposed car parking space.

The proposed location of the space is considered suitable for the following reasons:

- The additional car parking space is a legislative requirement in accordance with SEPP HSPD;
- A Statement prepared by Transport and Traffic Planning Associates, dated 1 February 2021 (Refer to **Appendix 4**) indicates that the space is capable of complying with the current Standards.

In light of the above, the approved development as amended, is considered to be consistent with the requirements of the PDCP 2014.

6. ENVIRONMENTAL ASSESSMENT

6.1 Traffic Generation and Car Parking

Given the nature of the proposed companion rooms being used for couples and the like whom are residents within the facility, visitation is not anticipated to significantly increase and will commensurate that of the original approved development. In addition, the Traffic Impact Assessment provided in the original Development Application via **DA19/0419** noted that traffic flows along Floribunda Avenue are quite minor and limited to local access movements. It is also anticipated that visitors to the site will utilise local bus services such as 797, conveniently located north of the site which provides a connecting service to the wider community around Glenmore Park as well as Penrith CBD.

Furthermore, in a Statement prepared by Transport and Traffic Planning Associates, dated 1 February 2021 it was concluded that the additional beds will not have significant impact on the surrounding road network and that vehicle generation as a result of the amendments will remain substantially the same as that approved by **DA19/0419**. Further it is noted that a maximum parking rate is not applied to the site and the development, as amended, complies with the minimum car-parking arrangements as provided within the SEPP HSPD. In this regard, the proposed modifications are not considered to have significant impact on traffic generation to the surrounding road network.

6.2 Access and Circulation

The location of the car parking space allows for adequate access and circulation in the north east section of the lower ground floor carpark. As provided in section 5.6 above, the location of the proposed space is suitable and capable of complying with the standards as set out in the Traffic Impact Statement by Transport and Traffic Planning Associates, dated 1 February 2021 (Refer to **Appendix 4**).

6.3 Design and Appearance

The modifications sought as part of this application do not alter the design, bulk or scale of the approved development and only relate to internal reconfiguration. The companion rooms proposed by this Modification Application are consistent with the approved sizes of bedrooms under the original consent.

7. CONCLUSION

This application seeks consent for modification of Development Consent **DA19/0419**, pursuant to Section 4.56 of the EP&A Act. The proposal has been prepared after taking into consideration the following key issues:

- Development history of the subject site;
- Development Consent **DA19/0419**;
- Site context and locality;
- Relevant heads of consideration under Section 4.56 of the EP&A Act; and
- Relevant statutory and non-statutory planning instruments.

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It is considered that the proposed modifications to incorporate companion rooms and reconfiguration of the Wellness Centre is consistent with the requirements of the EP&A Act and In this light and for the reasons stated throughout this letter, the proposal should warrant a favourable determination.

Should you require further information, please contact the undersigned.

Yours Faithfully,



Andrew Cowan

Director

Willowtree Planning

Enc.

Appendix 1 – Section 34 Agreement

Appendix 2 – Architectural Design Statement

Appendix 3 – Updated Architectural Plans

Appendix 4 - Traffic Impact Statement



WILLOW TREE
PLANNING

APPENDIX 1

Section 34 Agreement



WILLOW TREE
PLANNING

APPENDIX 2

Architectural Design Statement



WILLOW TREE
PLANNING

APPENDIX 3

Updated Architectural Plans



WILLOW TREE
PLANNING

APPENDIX 4

Traffic Impact Statement