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12 February 2025

Corey Polyak
Consultant
URPS
27 Halifax Street
Adelaide SA 5000

Dear Corey,

Re: 290 UNLEY ROAD, HYDE PARK – RESPONSE TO SUBMISSIONS FOR APPLICATION ID24037925

As requested, SALT provides the following response to the representations which have been submitted in response to the public notification of the above application, including the MFY letter dated 17 January 2025. The MFY letter confirms that application drawings prepared by SMFA dated 7 November 2024 and traffic and waste reports prepared by SALT have been reviewed. Ms Melissa Mellen states that she has visited the subject site.

The below response responds to *key points made by MFY in italics and indented*, with SALT's clarification and response below.

Lane / ROW

> *MFY: The proposed building will result in the effective narrowing of the lane. The solid wall proposed on the western boundary will create a requirement for 300mm clearance (unlike the existing parking spaces which effectively result in the clearance being achieved at the end of each space). Allowing for 300mm clearance to the proposed wall and existing opposite fence, the effective width of the lane would be reduced to 3970 mm*

The ROW will not be narrowed.

It's existing legal width of 4.57m as documented on the land survey title (FP 11716) will be retained.

The shared and publicly accessible ROW extends over a private road (FP 11716 – the private road is known as Lot 115). I understand that Council may be intending to facilitate its conversion to a public road pursuant to the provisions in the Local Government Act, 1999 subject to the required process and consultation. For the purposes of this letter, this will be referred to simply as the ROW.

The ROW provides direct access to a row of 6 x 90 degree angled parking spaces on the east side, on land that is owned by 290 Unley Road Pty Ltd. In other words, 6 privately owned 90 degree angled car parking spaces are positioned with direct access from the ROW on the subject site. These 6 x 90 degree spaces will be removed as part of the redevelopment and relocated to an onsite carparking area. Of note are 6 additional 90 degree parking spaces located on 290 Unley Road, currently accessed via a crossover directly to Esmond Street. This crossover, that provides direct access to the private land known as 290 Unley Road, is approximately 5.2 metres wide. As such there are currently 12 car spaces on the subject site, 6 accessed via the ROW and 6 accessed via the Esmond Street crossover.

To the south of 290 Unley Road are existing commercial tenancies that front Unley Road and have onsite parking at the rear. These tenants can currently access their rear car parking spaces by driving through the applicant's private land; 290 Unley Road, via the Esmond Street crossover or by using the ROW. It is my

understanding that the previous owner of the land at 290 Unley Road permitted the adjacent commercial tenants to enjoy informal access over their private land.

To further appreciate current access that is occurring on the ROW and through the 290 Unley Road private land, SALT collected traffic movement data on Wednesday 5th February 2025 between 4pm and 6pm and on Thursday 6th February between 7.30am and 9.30am. This peak hour movement data is shown below, noting that the AM peak hour occurred from 8.30-9.30am and the PM peak hour occurred between 4-5pm.

Car park movement peak
AM Peak: 8:30am - 9:30am
PM Peak: 4:00pm - 5:00pm

AM (PM)

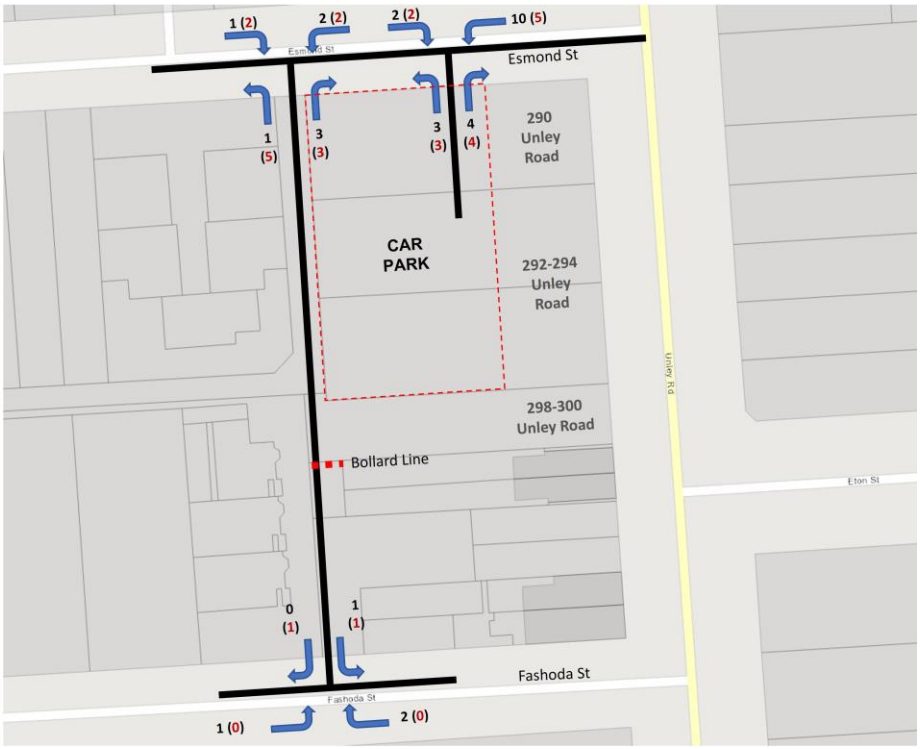

Figure 1 ROW & 290 Unley Road crossover on Esmond Street peak hour vehicle movements

The survey shows that during the AM peak hour, there were 7 movements in and out of the ROW via Esmond Street and 19 movements in and out from the 290 Unley Road crossover on Esmond Street, totalling 26 movements in and out. These 26 movements include those generated by 290 Unley Road and the adjacent tenancies, north of the bollards.

The survey shows that during the PM peak hour, there were 12 movements in and out of the ROW via Esmond Street and 14 movements in and out of the crossover at 290 Unley Road, also totalling 26 movements in and out generated by 290 Unley Road and the adjacent tenancies, north of the bollards.

MFY: The width of the lane is inadequate to cater for two-way traffic volumes, as described in both relevant Australian Standards and the Planning and Design Code.

As per above, the ROW width is 4.57m on land title information and two-way movements are permitted and occur.

There are 6 x 90 degree onsite spaces at 290 Unley Road accessed directly off the ROW. The redevelopment is seeking access to 15 onsite car spaces directly off the ROW. This is a net increase of 9 spaces and from a traffic engineering perspective is not considered to be materially different to existing conditions. This equates to an additional vehicle every 6- 7 minutes generated by 290 Unley Road. From a traffic engineering perspective, the existing ROW can readily accommodate this minor increase in vehicle movements.

MFY: Australian Standard Parking Facilities, Part 1 – Off-Street Parking (AS/NZS2890.1:2004) provides advice in respect to the width of the access to the car park. The proposed development would create a Category 2 access which would require a minimum access width of 6.0 m.

The width of the carpark opening via the ROW **is** approximately 6m.

MFY: PO 2.10 in the Urban Corridor Zone Main Street Overlay identifies a DTS/DPF requirement of 6.5m width for a rear access. The purpose of the provision is to provide for adequate two-way traffic movements on the rear access road.

The existing lane is significantly narrower than either of the above criteria and will not satisfactorily cater for the access requirements for the proposed development.

It is satisfactory.

The 4.57m width of the ROW is not being altered, and the net increase in car spaces at 290 Unley Road that will seek direct access via the ROW is increasing by 9 car spaces. This equates to an additional vehicle every 6-7 minutes generated by 290 Unley Road and does not in my opinion necessitate widening the ROW.

Closure of Esmond Street crossover

MFY: The closure of the existing access to Esmond Street will force all drivers associated with the proposal to access the parking via the lane. The narrow width of the lane will not only compromise its two-way nature, but will also prevent simultaneous turns from occurring to and from the site.

All 15 car spaces for the redevelopment will be accessed via the ROW. This is a net increase of 9 car spaces with direct access via the ROW compared with existing conditions. As per above, this is only an additional vehicle every 6-7 minutes during the AM or PM peak hour generated by 290 Unley Road and does not compromise it's function.

The ROW, even allowing for clearance from solid structures is capable of accommodating two-way traffic movements for the 99th percentile vehicle (including both the B85 design vehicle and B99 vehicle). The B99 vehicle is 1.94m wide as documented in the Australian Standard for Off-Street Car Parking. The ROW can therefore accommodate two B99 vehicles passing each other with approximately 230mm clearance on each side and between them, which is commensurate with the intent of a 300mm clearance for light vehicles. Furthermore, it is common for private roads of this width to be relied upon to accommodate two-way movements for light vehicles, with less than 300mm clearances, particularly given the low speed and low volume environment.

With respect, the concerns in relation to safety along the private road have been over-stated in my opinion. There is simply no need for the access to be wider as the intent of the ROW is to provide rear vehicle access.

For a car entering the ROW it may already, under existing conditions, need to wait and give way to a vehicle entering or exiting a 90 degree space. The redevelopment will consolidate any give way scenarios which might arise in one location, rather than along the length of the ROW adjacent to the 6 existing 90 degree parking spaces. The primary function of the ROW is to provide rear two-way access to properties, which it currently does and will continue to do.

Furthermore, in reality, one driver can simply give way to the other, as per existing conditions for manoeuvring, if that decision is made. Vehicles would be travelling at 20 km/h or less allowing sufficient time to view and prop.

> *MFY: even if an entering driver was to wait in the lane until another driver had exited the subject car park, the vehicle in the lane would need to be reversed towards Esmond Street in order to provide sufficient manoeuvring area to enable the exit movement to occur. This scenario does not currently occur as there is no solid wall along the eastern boundary of the lane and drivers are able to see approaching vehicles.*

As discussed above, 290 Unley Road has previously not restricted the use of their property for drivers visiting the rear parking spaces located at 292 to 294 Unley Road. The Esmond Street crossover may be restricted at any time, whether the proposed development does or does not proceed. The only reliable and entrenched rear access to the properties at 292 and 294 Unley Road is along the rear ROW. That ROW is capable of accommodating all rear vehicle movements including for 290, 292 and 294 Unley Road, as was originally intended, whether the proposed development does or does not proceed. The net increase of 9 car spaces that will gain access via the ROW has already been discussed above.

Access Sight Distance

> *MFY: Drivers exiting the proposed car park would not have adequate sight distance to view approaching traffic.*

SALT is not sure what MFY's reference to ádequate' is referring to. Similar to other ROW's that have parking spaces directly off them, as per existing conditons, drivers will be travelling at low speed and will be able to observe any movement and give way as necessary.

The current arrangement with 90 degree parking off the ROW already restricts any sight distance from the driver manoevuring in/out of carparking along the ROW.

Furthermore, given that only 15 car spaces are accessed via the consolidated development access driveway off the ROW, there is just a net increase of 9 spaces compared with existing conditions.

Sight Distance - Lane

> *MFY: The proposed building will create a sight distance restriction for drivers exiting the lane to Esmond Street such that minimum sight distance criteria will not be met for drivers, as illustrated in Figure 8.*
>
> *The above figure illustrates that the proposed development will introduce a crash risk scenario which is currently mitigated through the provision of adequate sight distance.*

The diagram presented in the MFY report does not illustrate the driver exiting the ROW in a realistic position where it would prop to give way and exit to Esmond Street. Given the ROW primarily will function as a car park accessway, we consider sight distance measured against the requirements of AS/NZS2890.1 for non-domestic properties a more appropriate assessment and are satisfied that these conditions will be met.

Pedestrian Sight Distance

> *MFY: The building will also result in the breach of Figure 3.3 of AS/NZS2890.1 (2004) which identifies the minimum corner cut-off requirement at an access to satisfy sight distance to a pedestrian on a footpath. The sight distance would not be met at the interface of the proposed development and Esmond Street.*

Figure 3.3 of AS/NZS2890.1 (2004) only requires the pedestrian sight distance triangle on the exit side of the accessway if the driveway (ROW) is two-lane, two way.

The sight triangle falls within private land adjacent to the west with the redevelopment proposal, as per existing conditions.

The pedestrian sight triangle for a two-way accessway is not required on the opposite side if the accessway is two-lane two way. Hence the breach claim that MFY makes is fundamentally incorrect.

Simultaneous Swept Paths

MFY: The construction of the building on the corner of the lane will compromise turning movements to and from the site. Figure 10 illustrates that simultaneous turns of vehicles will not be able to occur to and from the lane which will result in drivers being required to wait in Esmond Street and potentially for drivers to reverse along the lane adjacent the proposed building.

The existing geometry at the intersection will be retained and the existing entering and exiting arrangements maintained.

Integrated Carpark Solution

MFY: The proposal will compromise the functionality of parking on the adjacent site (292 – 294 Unley Road) due to the closure of the existing aisle. Figure 11 illustrates that drivers using the northern spaces in the adjacent car park will not be able to exit the spaces due to the lack of an end aisle extension.

The above figure demonstrates that while there may not be a formal right-of-way across the adjacent land, the approved design relies on the integrated site to provide safe and efficient manoeuvring into existing spaces.

The current approved design is consistent with PO 6.3 but the proposal will result in removal of the integrated carpark solution which will be inconsistent with this clause of the PDC.

It is appreciated that redevelopment of 290 Unley Road will modify how car parking spaces for the adjacent properties fronting Unley Road will be accessed, given they have enjoyed informal access via private land for some time.

The ROW along Lot 115 however will continue to provide lawful access and is readily able to accommodate the vehicle movements generated. I understand that our client is also proposing to upgrade the relevant portion of the ROW. This will result in cleaning up the ROW – i.e. removing weeds, resurfacing etc.

Traffic Generation and Distribution to the Lane

> *MFY: The SALT report identified a forecast peak hour traffic volume of nine trips during the am peak hour and seven trips during the pm peak hour.*
>
> *The proposal would result in being approximately 65 trips during the peak hour in the lane.*

SALT disagrees that 65 trips during the peak hour will occur along the ROW. Rather, the surveys that were undertaken last week demonstrate that a significantly lower number of movements currently occur (26 movements (AM Peak) and 26 movements (PM Peak) two-way. Conservatively assuming that the additional 9 car spaces will turnover within each peak hour, , this is still significantly less than 65 movements.

It is noted that 290 Unley Road has 3 tenancies; a vacant bicycle shop, open/operational shoe shop and open/operational chiropractor. Accordingly parking activity (vehicle movements along the ROW and Esmond Street crossover) from the shoe shop and chiropractor have already been accounted for in the February surveys.

It is acknowledged that the bicycle shop may generate parking activity if it was tenanted as a bike shop or other type of shop. An allowance of 2 movements during each peak hour will be adopted for this vacant tenant during each of the 8.30-9.30am peak hour and 4-5pm peak hour, this allowance is in line with the actual activity observed during the surveys. Therefore, the base case existing condition is 26+2=28 vehicle movements.

Accordingly, post development on the ROW north of the bollards:

- 28 peak hour vehicle movements currently generated north of the bollards on the ROW and via 290 Unley Road's Esmond Street crossover, plus
- 9 peak hour vehicle movements generated by the net increase in carparking accessed via the ROW
- Total 28+9 = 37 vehicle movements.

The ROW is therefore expected to carry no more than 37 vehicle movements post-development, with the proposal, not 65.

To further augment the above site specific analysis, the below theoretical analysis is provided for vehicle movements north of the bollards.

Table 1 Theoretical Existing Conditions Vehicle Movement Peak Hour Assessment

Property	Leasable Floor area and permitted use	Occupied or Vacant	RTA Guide Traffic Generation Rate	Peak hour volume AM (vehicle trips)	Peak hour volume PM (vehicle trips)
Properties that enjoy vehicle access via the 290 Unley Road's Esmond Street crossover and the ROW (north of the bollards)					
290 Unley Road	Bicycle Shop Shoe Shop Chiropractor[1] 360m2 total	Vacant (assumed operational for empirical assessment) Occupied Occupied	<u>AM Peak</u> 0.196 x GLFA <u>PM Peak</u> 0.259 x GLFA	71	93
292-294 Unley Road	Health Clinic Architecture Firm[2] Dentist 615m2 total	Occupied Occupied Occupied	32 vehicle trips per centre[3] 0.0314(R2) + 6.1122(R) 8.0607 person trips	<u>Site Peak Hour</u> 32 <u>Peak 1-hour (in + out)</u> 48[4]	
298-300 Unley Road	Hairdresser 150m2	Occupied	<u>AM Peak</u> 0.196 x GLFA <u>PM Peak</u> 0.259 x GLFA	30	39
Total theoretical traffic generation for the ROW based on existing conditions				133[5]	164[6]

[1] Area assessed using shopping centre rates as breakdown of individual leasable properties and consulting rooms is unavailable. Areas for Chiropractor and Architecture Firm were assumed to be interchangeable in this assessment.

[2] Area assessed as part of medical centre. Areas for Chiropractor and Architecture Firm were assumed to be interchangeable in this assessment. If assessed as office block the Architecture firm would generate approximately 2 vehicle trips in the AM and PM peak (100-150m^2 GFA)

[3] From TfNSW Guide to Transport Impact Assessment | TS00085 | V1.1 Section 5.6.9, Medical Centres, weekday average site peak hour where surveys were undertaken at medical centres with floor spaces varying from 210m^2 to 1361m^2 (number of consulting rooms varying from 5 to 23 rooms).

[4] 57 person trips multiplied by 83% car mode split from Table 5.69 in TfNSW Guide to Transport Impact Assessment | TS00085 | V1.1

[5] Includes 32 vehicle trips for the medical centre land use

[6] Includes 32 vehicle trips for the medical centre land use

The theoretical analysis utilising rates and assumptions from the transport for NSW Guide to Trip Generating Developments and the TfNSW Guide to Transport Impact Assessment | TS00085 indicated under existing conditions, the subject site would be generating in the order of 71 trips (vehicle movements) during the AM peak and 93 trips (vehicle movements) during the PM peak (assuming the bicycle shop tenancy was still in operation). By contrast, the trip generation associated with the current proposal is far lower resulting in a theoretic reduction in traffic generation at the site.

Furthermore, the remaining tenancies have a theoretical traffic generation of 62 trips in the AM peak and 71 trips during the PM peak.

The assessment undertaken by SALT clearly shows that the actual surveyed vehicle movement generation associated with the tenancies between Esmond Street and the bollards along the ROW, post-development, are far lower than any theoretical assessment. In this instance, the RTA assessment over estimates traffic generated along the ROW and should not be relied upon in any assessment. With respect, the analysis provided by MFY is incorrect.

Rather SALT's analysis indicates that the future total generation along the ROW will be up to 37 vehicle movements during the peak hours. Note that across the day, between the peak hours, movements will be lower.

The 37 peak hour movements are generally equivalent to the suggested cap of 30 movements in both directions in which a single lane access can be used to facilitate access to a development. Notwithstanding, the redevelopment is exceeding the above reference to the Australian Standards as two-way vehicle movements can indeed be geometrically accommodated along the straight ROW.

Note above discussion adopting 2 x B99 vehicles with 230mm clearance on either side and in between.

As such, the cap of 30 movements does not apply, as the ROW is two-way two lane.

Relation of Traffic Generation to Lane Widths

> *MFY: The existing lane will provide the only access to the subject site and the adjacent tenancies and residential properties following completion of the proposed development and will therefore have a volume of approximately 65 vehicles during the peak commuter period. AS/NZS2890.1 (2004) identifies that an access driveway has a minimum width requirement of 5.5 m and that Category 2 driveways should have a minimum width of 6.0m. The Standard does provide for lesser widths for Category 1 driveways but that "as a guide, 30 or more movements in a peak hour (in and out combined) would usually require for provision for two-vehicles to pass on the driveway". The proposal, therefore, would result in the access breaching the requirements of the Australian Standard.*

Disagree.

For the reasons set out above, in my opinion far less than 65 movements will occur. This redevelopment is simply adding vehicle movements by another 9 car spaces, plus a refuse truck 3 times a week if it is accepted, as it must be, that continuing access through 290 Unley Road will not be permitted to continue in future, however that site may be lawfully developed. I have significant difficulty with the reliance which MFY places on comparisons between the proposed development and the existing situation which relies upon the informal use of private land which can be brought to an end at any time. The fact is that the ROW was always intended to provide the sole lawful rear access for the other shared users of the ROW and is readily capable of doing so.

In any event, I disagree with MFY's claim regarding a single lane access scenario in the Australian Standard given that vehicles can in fact pass each other on the ROW.

Furthermore, the Australian Standard is a guide, not legislation.

Refuse Collection

MFY: The proposal does not provide for servicing or refuse collection from the subject site. Figure 12 illustrates that a refuse vehicle will not be able to turn on-site to enter and exit the site in a forward direction.

Adequate provision for waste collection is proposed, refer drawings prepared by SMFA that illustrate a small rigid vehicle propping on the site for collection. I am satisfied that this will be a practical arrangement that will occur in a low speed environment 3 times a week (3 trucks per week).

Height Clearance

MFY: The height clearance within the proposed car park is not clear on the plans but given that the floor to floor height is proposed to be 3.0m, the clearance in the car park would only be approximately 2.2m. While this complies with the requirements for a car park, it would not provide adequate clearance for a refuse or delivery vehicle. Even if deliveries were to occur in vans, many such vehicles are higher than the design vehicle used for the site (that is a B85).

The waste truck that will collect waste streams in a garwood minor type truck that has a height clearance less than 2.2m for travel and for lifting bins, a total of 2.5m clearance is required, therefore I do not accept the concern which has been expressed.

Ambulance Access for Dental Tenancy

MFY: The dental tenancy at 292-294 Unley Road requires access for an ambulance. Figure 14 illustrates that an ambulance will not be able to turn to enter and exit the carpark adjacent the dental tenancy.

Vehicles currently enjoy access to 292-294 Unley Road over private land at 290 Unley Road.

Access will continue to be achievable via the ROW or via Unley Road, which we suggest would offer a faster alternative to responding to incident than having to navigate to the rear of the property.

Bicycle Parking

MFY: The proposal does not illustrate bicycle parking within the site. While such parking is recommended in the SALT report, it is not clear where it could be accommodated within the car park.

Refer updated architectural plans that show onsite bicycle parking.

General Summary Against SAPDC Provisions & Lane Access Width

MFY: the proposal will create an unsafe situation at the existing intersection with Esmond Street and the existing lane. The proposal will not result in safe and convenient access and will compromise the access for other users of the lane which rely on this route for their only access. The development would result in a scenario which creates unacceptable road safety issues for drivers. Further, it will not be consistent with the following Transport, Access and Parking Provisions in the PDC PO 2.1, 2.2, 3.1,3.2, 3.3,3.4, 3.8, 6.2, 6.3, 6.6, 6.7, 7.1 and 9.1. Further, the proposal does not satisfy PO 2.10 of the Urban Corridor Zone Main Street Overlay. This provision clearly indicates that a minimum width of 6.5m is required when facilitating rear access for a development.

Refer above. The net increase in parking spaces that 290 Unley Road is seeking to gain access via the ROW is only 9 spaces.

The arrangement is considered satisfactory with rear access for a redevelopment that includes 15 car spaces via a ROW.

Carpark Layout

MFY: access to Space 15 requires that drivers park facing the incorrect direction, in breach of the Australian Road Rues.

SALT has already demonstrated that vehicles can access space 15 in a forwards direction by turning around within the carpark. Regardless, vehicles prop on the opposite side of carparking aisles to manoevre into/out of parking spaces across private land commonly in Australia. It is a carparking accessway for manoevuring, not a road, so the ARR would not be applied in the same manner. A vehicle will be able to access the parking space and a column will be relocated to further faciliate this (Figure 2). The vehicle would reverse into the space then move forward to position fully within the space. The vehicle could then turn within the parking

aisle, utlising the space (Figure 3) to then exit the site in a forward direction, or exit the space and turn around at the end of the car park (Figure 4) and then leave the site in a forward direction. The vehicle could also park in the direcition of travel to the exit by first turning around at the end of the car park (Figure 4).

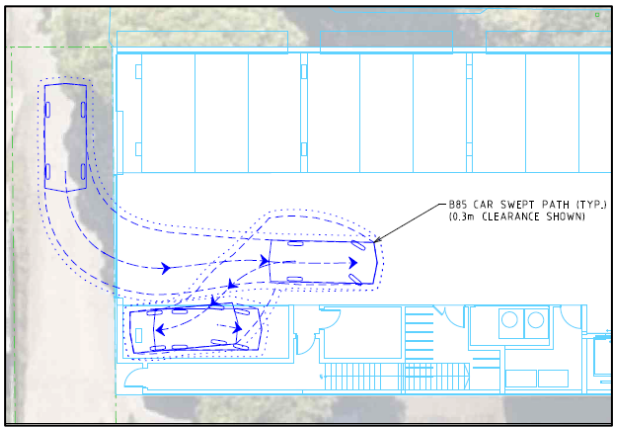

Figure 2 – Vehicle Access to Parallel Space

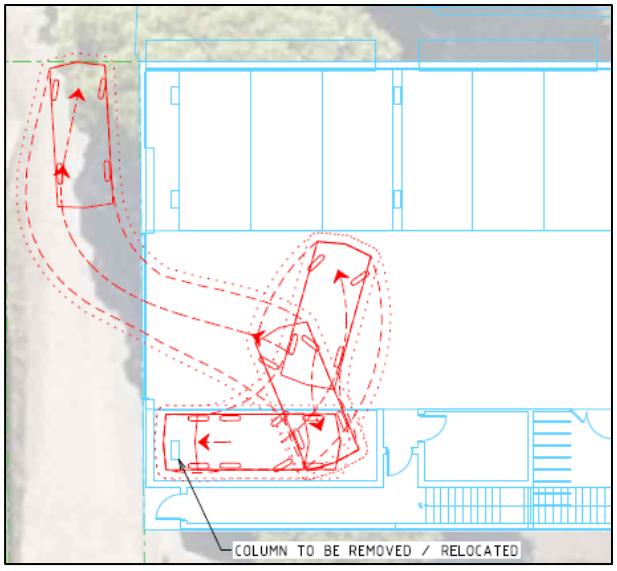

Figure 3 – Vehicle Exit from Parallel Space

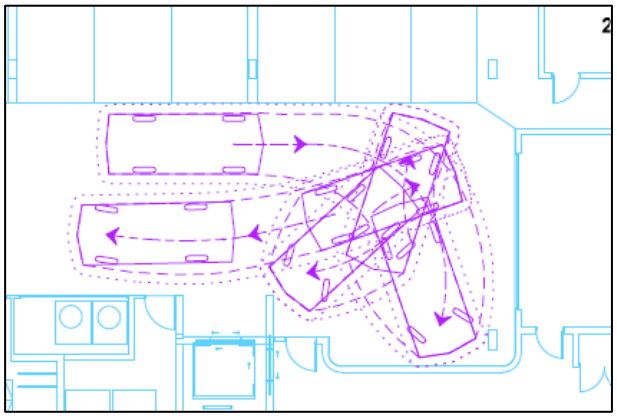

Figure 4 – Vehicle Access to Parallel Space

MFY: An additional 300 mm clearance between the aisle and solid objects, such as the waste room wall, is not provided; and

It is unclear which requirement MFY are referring to.

Regardless, SALT is satisfied that all car spaces are readily accessible.

(g) The design relies on a B85 vehicle executing a five-point turn. While multi-point turns can be considered when accessing parking spaces, such a requirement would typically be limited to a B99 vehicle.

The Australian Standard notes and it is widely accepted within industry that swept paths are conservative and vehicles can turn better than shown, which is generally why swept path for complying parking spaces are not produced. We have opted to do this on this occasion due to the garage area and vehicle turnaround. It's noted in draft updated standards that while the requirement for a B85 is recommended to be up to 3 movements, there are proposals to modify the lock to lock steering time for the models to reflect the better performance that can be achieved for reality. Presently the lock to lock on the models is set to 6 seconds. For a Class 1 facility the draft standards propose a lock to lock time of 2 seconds significantly improving the performance of the swept path model. Although it is acknowledged the standards are not yet in effect, the proposed changes reflect the realisation from industry that swept paths in car parks generally do not reflect the true vehicle's performance.

In SALT's opinion, we are therefore not concerned about the multiple corrections shown in the B85 model. Given the above modifications identified by industry proposed for lock to lock steering time in the draft (new) Australian Standards, in reality it is quite possibly just one correction.

Summary

MFY: In summary, the proposal seeks to maximise the footprint of the land for the proposed development. In doing so, it will not only compromise safe and convenient access for the site but will create an unsafe environment at the existing access for adjacent commercial tenancies and residents. The proposal will result in the lane being a Category 2 driveway servicing a number of sites, albeit it does not meet the minimum width requirement identified in AS/NZS2890.1:2004. Even in the event that the lane could be considered a Category 1 driveway, there will be more than double the volume of traffic considered appropriate for a single lane access width. In my view, therefore, the proposal will not cater for safe and convenient access to the site and will breach the requirements of the Planning and Design Code as it relates to access requirements.

The proposal seeks to achieve a car park design suitable for the class of development that can be accommodated within the existing site footprint.

The ROW was formed solely to provide access to the rear of the properties on Unley Road and Esmond Street and currently operates with two-way flow serving as access to 90 degree parking spaces directly from the ROW as well as a secondary car park access to 292-294 Unley Road.

The traffic survey completed by SALT has demonstrated that the theoretical traffic generation presented by MFY appears grossly overestimated based on the actual traffic volumes observed on site during the car park / ROW AM and PM peak hour periods. For all intents and purposes the average traffic flow expected as a result of the current traffic volumes combined with the anticipated traffic generation associated with the proposal is generally equivalent to the suggested cap in the standards for which a single lane access can be used to provide access to a development. Furthermore, that Australian Standard reference is for single lane ROW, whereas the ROW has a width that allows two B99 vehicles to pass. As such this clause, which is only a guide, does not apply.

The low volume of vehicle movements with the ROW geometry facilitates the ROW as a low speed environment, which it is intended to be. Conservatively assuming 2 x B99 need to pass on the straight ROW, they can, with clearance provided on each side and between them. We therefore disagree with MFY's statement that the proposal will breach the SAPDC as it will not cater for safe and convenient movements.

I trust this addresses the representation comments raised by MFY, however should you have any further queries, please feel free to contact me.

Yours sincerely,

Jo Garretty
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