



Herring Road Urban Activation Precinct Submission



82 Waterloo Road, Macquarie Park

Submitted to the NSW Department of Planning & Environment

On Behalf of Goodman Property Services (Aust) Pty Ltd

13 August 2014 ■ 14405

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7/08/2014

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7/08/2014

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1.0 Introduction

This submission has been prepared by JBA on behalf of Goodman Property Services (Aust) Pty Ltd (**Goodman**). This submission relates to the NSW Department of Planning & Environment's (the **Department**) proposal for the Herring Road Urban Activation Precinct (**UAP**) which is currently on exhibition. Specifically, this submission is made in respect of 82 Waterloo Road, Macquarie Park (the **Site**) which is owned by Goodman Funds Management Limited.

The Herring Road precinct proposal comprises:

- A mix of land uses to transform the precinct into an active place for living, learning and working;
- A quality higher density urban community that utilises excellent transport infrastructure and access to job markets, educational facilities, retail, local services and recreational assets;
- Increased building heights and densities that can improve housing supply and choice;
- A transformation of Herring Road into an active street, with wider pavements, new landscaping and new places to meet;
- Better connected and finer-grained streets and pedestrian / cycle and networks providing safer, more convenient and pleasant access; and
- Opportunities for new and improved parks, spaces, playgrounds and community facilities.

The Herring Road UAP presents an exciting opportunity to deliver additional housing and employment in close proximity to existing public transport infrastructure, social infrastructure such as Macquarie University and services including the Macquarie Shopping Centre.

The Department's new *Population and Dwelling Projections* released in June 2014 demonstrate increased demand for residential dwellings in the Ryde LGA compared to the targets presented in the draft *Metropolitan Strategy for Sydney to 2031*, on which the Herring Road UAP is based. The new data suggests there is a net projected demand for a further 7,500 dwellings within the Ryde LGA by 2031 over and above those already approved and planned for in the Herring Road and North Ryde UAPs. The Herring Road UAP presents an opportunity to meet this additional demand, subject to appropriate transport and social infrastructure to meet the needs of the incoming population.

For the subject Site, the Herring Road UAP proposes a maximum building height control of 65m and a maximum floor space ratio (**FSR**) control of 3:1. The purpose of this submission is to request an increase in the maximum FSR to 4:1.

2.0 The Site

2.1 Site Location and Context

The Site is located at 82 Waterloo Road, Macquarie Park, within the Ryde Local Government Area (LGA). The Site is situated on the southern side of Waterloo Road, adjacent to Shrimpton Creek.

The Site is located approximately 14km north-west of the Sydney Central Business District, and is in the north-western edge of Macquarie Park, which forms a key part of Sydney's Global Economic Corridor. Macquarie Park is classified as a 'Specialised Precinct' in the Draft Metropolitan Strategy for Sydney to 2031.

The Site is within close proximity to a number of services, including:

- Macquarie University Station, which is a 3 minute walk to the north-west (280 metres);
- Macquarie University, which is a 4 minute walk to the north-west at the closest point (350 metres); and
- Macquarie Shopping Centre, which is a 2 minute walk to the north-west (180 metres).

These walking distances are well within the desirable walking catchment for high density residential development from local centres and transport hubs (400 to 800 metres). The site's locational context is shown at **Figure 1**.

2.2 Site Description & Existing Development

The site area is 10,500m² and it is irregularly shaped, with a curved western boundary which follows the alignment of Shrimpton Creek. The Site generally falls from the road to the rear boundary and has a cross fall from south-east to north-west.

The Site is occupied by a four-storey commercial office building with two levels of basement parking for 224 cars, known as the Everglades Campus. An at-grade car park is also provided adjacent to the south-western boundary of the site. The building was completed in 2002. The total lettable area of the building is 10,416.7m².

Vehicular entry and egress is provided to the Site from Waterloo Road. Waterloo Road is a four-lane divided carriageway, and opposite the site there is a north-west running slip lane providing right-turn access into the Macquarie Shopping Centre opposite the Site.

There is a grassed and landscaped area located on the northern end of the Site, adjacent to Waterloo Road.

2.3 Surrounding Development

The Site is located in a predominantly commercial area, although there is some residential development in close proximity to the Site.

Directly to the north on the opposite side of Waterloo Road is the Macquarie Shopping Centre, which is owned by AMP. To the north-east at 101 Waterloo Road (also a Goodman-owned site) there is a four-storey commercial office building. To the east at 80 Waterloo Road are two commercial office buildings.

To the south-west at 6-8 Byfield Street is a strata-titled industrial park and to the south-east at 10 Byfield Street is a single storey warehouse with a two storey attached office component. Development consent was recently granted for the demolition of those buildings and the construction of a nine-storey, 192 bed hotel and café.



Figure 1 – Site Location and Context

3.0 Goodman’s Proposal

Goodman submits that the maximum FSR control for the Site should be increased from 3:1 to 4:1.

Goodman has commissioned Nettleton Tribe to prepare an indicative concept plan to illustrate how the proposed FSR control could be realised on the Site. The indicative concept plans, provided under separate cover and extracted in **Figure 2** below, include the following:

- A total of three (3) buildings between 12 and 17 storeys, comprising serviced apartments on the first three levels and residential apartments on the levels above. Buildings A and B share a common podium.
- A substantial parcel of public open space, measuring approximately 2,610m², or 24% of the site area. The open space will have a frontage to the street and will link to the proposed open space at 101 Waterloo Road across the road (as described in a separate written submission).

The residential flat buildings have been designed to comply with the existing/proposed DCP controls for the Herring Road UAP proposal, and the building separation, building depth and solar access guidelines of the SEPP 65 *Residential Flat Design Code (RFDC)*. This further supports the argument that the Site is capable of accommodating additional FSR.



Figure 2 – Extract of Goodman’s Concept Proposal
Source: Nettleton Tribe

3.1 Land Use

The Site is part zoned B4 Mixed Use under the *Ryde Local Environmental Plan 2010*. The UAP proposes to retain this zoning. Goodman raises no objection to the retention of the B4 Mixed Uses Zone.

The Indicative Structure Plan in the UAP proposal designates the future use of this Site for “mixed residential/retail/commercial” purposes, with the potential for local shops and cafes fronting Waterloo Road.

This submission envisages that the Site will be developed for a mix of serviced apartments and residential purposes, with the potential for retail/cafe uses on the ground floor. The Site is suitable for predominantly residential development given its close proximity to public transport, a shopping centre and a university, as well as local and regional open space such as Lane Cove National Park.

3.2 Increase in Maximum Floor Space Ratio

Goodman submits that the maximum FSR control for the Site should be increased from 3:1 to 4:1, to provide the opportunity to deliver up to 114 additional dwellings (approximately, and based on an average apartment size of 62m²) above and beyond that contemplated by the Herring Road UAP proposal.

An FSR of 4:1 would allow up to 42,000m² of GFA on the Site.

As demonstrated in the following section, the Site is capable of supporting a maximum FSR of 4:1. The justification for this is discussed below.

4.0 Justification

It is submitted that the proposed increase in FSR to 4:1 is justified on a number of grounds, including:

1. The additional 114 dwellings (approximately) that can be delivered by the additional 1:1 will assist Ryde Council to achieve its dwelling targets in light of the Department's new population projections released in June 2014;
2. The Site is strategically located, being only a 2-4 minute walk from key infrastructure and services, and not immediately adjacent to any residential uses;
3. Surrounding land will have an FSR control of 4:1 or higher under the UAP;
4. The Site is capable of achieving 4:1 while complying with the proposed height limits, the current/proposed DCP controls and the RFDC building separation, building depth and solar access controls;
5. The Traffic Report prepared by Traffix demonstrates that the higher FSR is expected to generate lower traffic volumes than the existing use on the Site;
6. Finally, the additional FSR can be achieved while still delivering significant public benefits, such as public open space.

Each of these arguments is elaborated on below.

4.1 New Population & Dwelling Projections in the Ryde LGA

The Herring Road UAP Planning Report states (page 63) that *"the Herring Road precinct has significant potential for increased development density and improved local housing supply. ... [T]he rapid sales and take-up of recent Herring Road residential development commencements indicate a latent local demand for apartments."*

In June 2014, the Department released new population, household and dwelling projections to 2031 for all LGAs in NSW, including Ryde. The Department's projections and annual local performance monitoring data indicate that:

- 62,950 dwellings will be required to accommodate the projected population growth in Ryde, compared to 55,516 projected in 2011 – an increase of 7,434 dwellings.
- There were 44,050 dwellings in the Ryde LGA as at 2011.
- To meet the projected demand for 62,950 dwellings by 2031, total dwellings in Ryde will need to increase by **18,900 dwellings**.
- Between 2004 and 2011, Ryde Council averaged 485 dwelling approvals per year. In the 12 months to June 2012, Ryde approved 1,003 dwellings and in the 12 months to June 2013, 952 dwellings were approved.

Based on the projected dwelling demand of 18,900 dwellings, and assuming that:

- Council approved another 1,000 dwellings to June 2014;
- 3,000 new dwellings will be provided at North Ryde UAP, and
- 5,400 new dwellings will be provided at Herring Rd UAP (as currently proposed),

then there is still a net projected demand for a **further 7,500 dwellings** within the LGA by 2031.

The Department's projections also project an additional 44,300 people in the Ryde LGA by 2031 compared to 2011 figures. This represents an additional 8,700 people compared to the preliminary population projections released in 2013. Based on average occupancy rates of 2.1 persons per dwelling, this equates to approximately 4,142 dwellings.

The Herring Road UAP proposal was placed on public exhibition in June 2014, around the same time that the Department released its new projections. Given their (approximately) concurrent release, it is possible that the Herring Road UAP proposal did not take the new figures into account when arriving at the target of 5,400 dwellings for the precinct. If that is the case, then the proposed height and FSR standards proposed in the Herring Road UAP fall short because the base projections are outdated.

The additional 114 dwellings (approximately) that can be achieved by increasing the GFA from 3:1 to 4:1 would help to contribute to the shortfall. The Herring Road UAP is a precinct in which the market is keen to develop. If the precinct can be accelerated and brought to market faster, then Council and the Department will not have to rely on other sites to make up this shortfall.

4.2 Strategic Location of the Site

The subject Site is well-placed to accommodate additional FSR. That is because:

- It is within 2 minutes' walking distance of the nearest entrance to the Macquarie Centre and 4 minutes' walking distance to the Macquarie University Station, as illustrated in **Figure 1**;
- There are 27 different bus routes which service the Herring Road precinct, fifteen of which stop outside 80 Waterloo Road directly to the east and provide connections to Blacktown, the Hills District, the North Shore and the Sydney CBD;
- The Site is very easily accessible to and from other areas of Sydney given its proximity to the M2 Motorway.

While a number of sites in the precinct possess the above attributes, the subject Site is particularly well-placed to accommodate additional FSR because the sites to the south are commercial sites that are unlikely to be redeveloped for residential purposes in the foreseeable future. This means that any additional overshadowing created by additional building bulk as a result of the FSR uplift on the Site will not affect residential uses to the immediate south. Specifically, the site to the south-west at 6-8 Byfield Street is a strata-titled industrial park, while the site to the south-east at 10 Byfield Street is a commercial site which was recently granted approval for a hotel development. Furthermore, those sites are not located in the Herring Road UAP which means they will retain their B7 Business Park zoning for the foreseeable future.

It is therefore reasonable to recognise that those sites within the Herring Road UAP that are capable of being redeveloped to deliver the objectives of the UAP should be pushed to "work harder" and maximise their ability to contribute to achieving the State Government's strategic dwelling targets.

4.3 FSR of Surrounding Land

The Site adjoins a number of sites in the precinct which are proposed to have maximum FSR controls of 4:1 or higher. As illustrated in the proposed Zoning Map in **Figure 2**, FSR controls of 4:1 and 4.5:1 are proposed for land to the south-east and north-west respectively. There is no urban density reason supporting a lower FSR than 4:1 for 82 Waterloo Road.

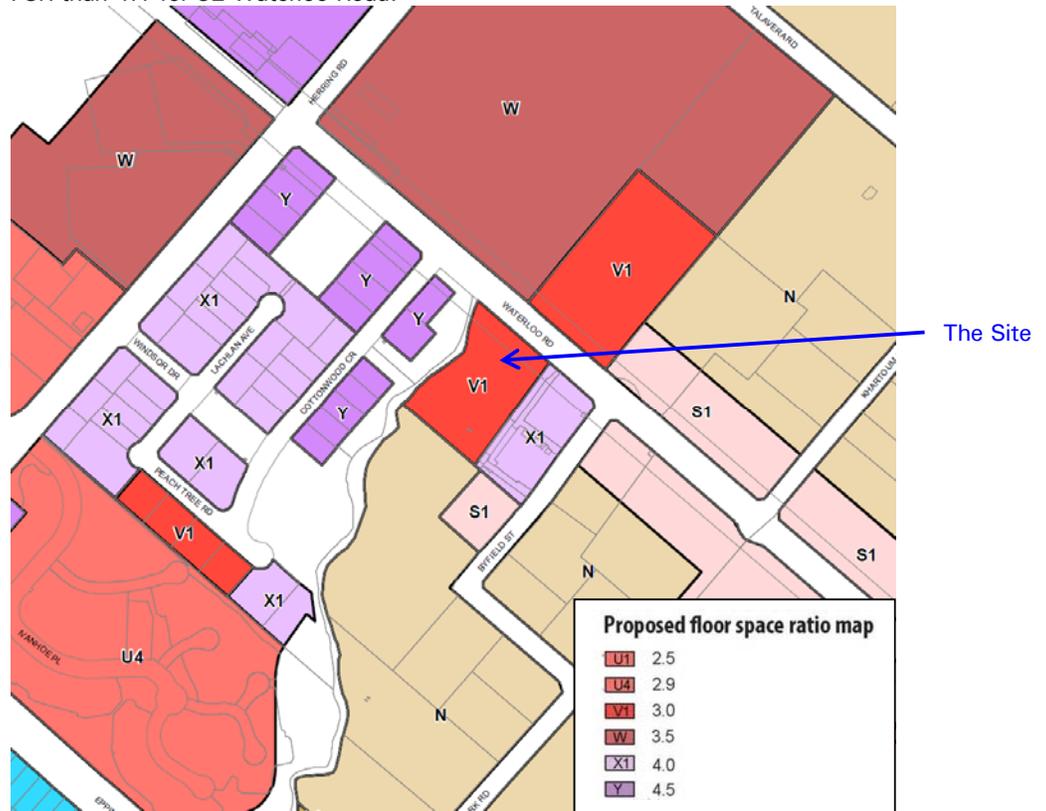


Figure 3 – Proposed FSR Map
Source: Herring Road UAP Planning Report

4.4 Compliance with DCP & RFDC Guidelines

Nettleton Tribe's concept plan has been designed to comply with the current Ryde Development Control 2010 and the proposed amendments set out in the Herring Road UAP Planning Report, as well as the building separation, building depth and solar access guidelines in the SEPP 65 RFDC. This demonstrates that the Site can accommodate 4:1 within the planning framework. The conceptual scheme includes buildings that:

- Are setback 10m from Waterloo Road;
- Have street wall heights of 3 storeys, with upper levels set back 4 metres;
- Have maximum depths of 18m (plus balconies), consistent with the RFDC;
- Have tower floor plates above the street wall of approximately 800m²;
- Are separated by 24 metres in accordance with the RFDC; and
- Due to their significant separation, are likely to achieve at least 2 hours of solar access for at least 70% of apartments.

This further shows that the Site is capable of accommodating additional FSR.

4.5 Traffic Impacts

Goodman has engaged Traffix to analyse the likely traffic impacts of the increased density on the Site. The Traffic Report, attached at **Appendix A**, concludes that the proposed higher FSR scheme on the Site is expected to generate **lower** traffic volumes than the existing use on the Site (20 to 33 fewer vehicle trips than the current use on the Site during the critical peak hours).

Table 1 – Traffic generation

	FSR	Units	AM Peak	PM Peak
Current traffic generation (surveyed July 2014)	-	-	120	89
Predicted traffic generation (compliant FSR scheme)	3:1	343	65	51
Predicted traffic generation (proposed FSR scheme)	4:1	457	87	69
Proposed FSR scheme – Additional traffic over and above existing traffic	-	-	-33	-20

4.6 Community Benefits

Generally speaking, higher densities on the subject Site are likely to have substantial community benefits including:

- Increased housing affordability, as more dwellings can be provided with economies of scale in production leading to reduced costs of construction;
- Transport savings, which become manifest as travel time savings due to greater yields within greater proximity of residents to workplaces and public transport networks; and
- Leveraging existing assets, as higher yields will lead to more effective use of existing infrastructure in the immediate area.

The concept scheme prepared by Nettleton Tribe demonstrates that higher densities of 4:1 can be achieved on the Site while delivering public open space in close proximity to the commercial core and Macquarie Centre, at no cost to Council.

The public open space included in the concept scheme measures approximately 2,610m², or 24% of the site area, which is significant. The open space is located adjacent to Shrimpton Creek which will allow the continuation of the green corridor along Shrimpton Creek from the south as much as possible. The location of the open space would also allow for a visual connection to future open space at 101 Waterloo Road, as detailed in a separate written submission for that property.

The provision of public open space on the Site is particularly beneficial as there is currently a deficit of public open space in the Herring Road UAP (page 26 of the UAP Planning Report). While the Herring Road UAP proposal aims to address this deficit, it does so by providing better connections between public open spaces rather than by significantly increasing the quantum of public open space in the precinct. It is difficult to do so in a precinct that is dominated by private land

holdings. Therefore, Goodman's proposal to offer almost 3,000sqm of public open space on a privately owned site has the potential to provide a significant public benefit.

Public open space could be delivered either by:

- A site-specific LEP clause requiring a quantum of public open space to be provided on the Site in the event that the developer utilises the full amount of allowable GFA; or
- The DCP being amended to show 3,000sqm of open space on the Site, ensuring that its location/configuration is flexible.

This approach is preferable to, say, rezoning part of the Site to RE1 Public Recreation to mandate the delivery of public open space in a pre-empted location.

Furthermore, we note that an easement is currently located on the western portion of the Site which precludes development from occurring in this area. The increased FSR recognises that portions of the Site cannot be redeveloped and simply seeks to transfer the development potential to the unconstrained parts of the Site.

5.0 Conclusion

This submission relates to 82 Waterloo Road, Macquarie Park and the planning framework proposed by the Herring Road UAP.

For the subject Site, the Herring Road UAP proposes a maximum FSR control of 3:1. The purpose of this submission is to seek an increase in the maximum FSR control to 4:1. The proposed FSR uplift is justified for the following reasons:

- The additional 114 dwellings (approximately) that can be delivered by the additional 1:1 will assist Ryde Council to achieve its dwelling targets in light of the Department’s new population projections released in June 2014;
- The Site is strategically located, being only a 2-4 minute walk from key infrastructure and services, and not immediately adjacent to any residential uses;
- The sites to the south are commercial sites that are unlikely to be redeveloped for residential purposes in the foreseeable future;
- Surrounding land will have an FSR control of 4:1 or higher under the UAP;
- The Site is capable of achieving 4:1 while complying with the proposed height limits, the current/proposed DCP controls and the RFDC building separation, building depth and solar access controls;
- The Traffic Report prepared by Traffix demonstrates that the higher FSR is expected to generate **lower** traffic volumes than the existing use on the Site;
- Finally, the additional FSR can be achieved while still delivering significant public benefits, such as public open space.

In light of the above, it is reasonable to recognise that those sites within the Herring Road UAP that are capable of being redeveloped to deliver the objectives of the UAP should be pushed to “work harder” to maximise their ability to contribute to achieving the State Government’s strategic dwelling targets and the objectives of the UAP.

Traffic Report

Traffix



Reference: 14.346p01v1

8 August 2014

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Attention: Mr Will Dwyer, National Manager Planning

Re: 82-86 Waterloo Road, Macquarie Park

Dear Will,

We refer to your recent correspondence concerning the potential rezoning and redevelopment of the site at 82-86 Waterloo Road, Macquarie Park.

We have considered the intent of the Herring Road Urban Activation Precinct Proposal with respect to the suggested density of redevelopment on the subject site, in terms of traffic generation and its associated impact upon the surrounding road network. The results of our investigations are summarised in the following sections.

Location and Site

The subject site located on the southern side of Waterloo Road, directly to the east of Shrimpton Creek.

Vehicular access to the subject site is currently provided via a left-in, left-out driveway on Waterloo Road, which is located approximately 75m to the west of the Byfield Street roundabout.

A Location Plan is presented in **Figure 1** below, and a Site Plan is provided as **Figure 2**.

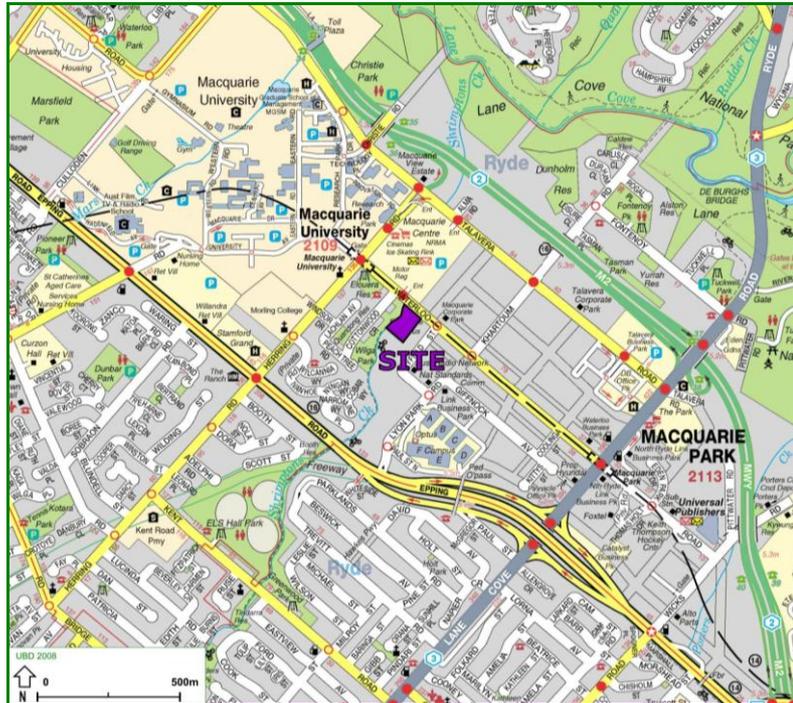


Figure 1: Location Plan

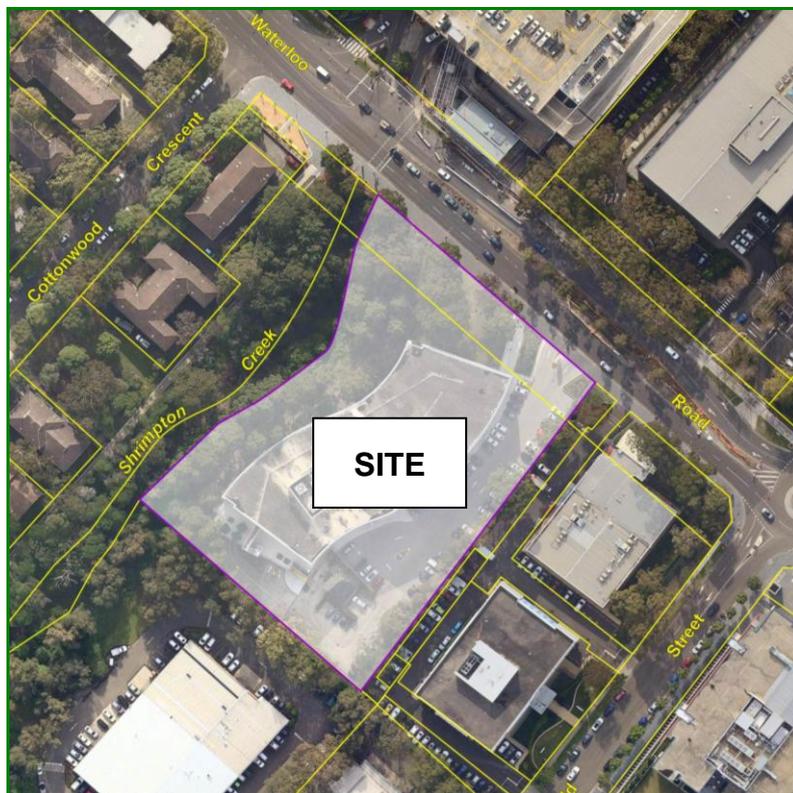


Figure 2: Site Plan



Existing Development

The site currently accommodates a commercial building with a number of commercial tenancies.

Traffic surveys were undertaken at the access driveways, to establish the level of traffic currently generated by them during the morning and evening peak hours. The results of these surveys are provided as **Attachment A**, and summarised in **Table 1** and **Table 2** below.

Table 1: Existing Development Traffic Generation (AM Peak)

Time Per	Driveway		TOTAL	Hourly Totals
	In	Out	In + Out	In + Out
0700 - 0715	9	0	9	
0715 - 0730	14	0	14	
0730 - 0745	11	1	12	
0745 - 0800	17	4	21	56
0800 - 0815	26	1	27	74
0815 - 0830	30	4	34	94
0830 - 0845	29	3	32	114
0845 - 0900	24	3	27	120

Table 2: Existing Development Traffic Generation (PM Peak)

Time Per	Driveway		TOTAL	Hourly Totals
	In	Out	In + Out	In + Out
1600 - 1615	1	14	15	
1615 - 1630	2	12	14	
1630 - 1645	2	22	24	
1645 - 1700	4	19	23	76
1700 - 1715	1	24	25	86
1715 - 1730	1	16	17	89
1730 - 1745	1	17	18	83
1745 - 1800	1	4	5	65

In summary, the traffic generation of the existing development on the subject site is:

- 120 vph in the morning peak hour
- 89 vph in the evening peak hour



The Proposal

It is understood that the site at 82 - 86 Waterloo Road is to be rezoned and redeveloped for residential purposes.

For the subject site, a floor space ratio (FSR) of 3.0 : 1 is suggested in the Herring Road Urban Activation Precinct Planning Proposal, which would support in the order of 343 units based on information provided by Nettleton Tribe Architects.

It is understood however that a higher FSR of 4.0 : 1 is sought, which would support in the order of 457 residential units.

As requested, we have considered the traffic impact of a residential development of 457 residential units upon the surrounding road network, taking into consideration the level of traffic generated by the existing use on the subject site. The results are outlined in **Table 3** below.

The assumed traffic generation rates for the proposed residential use are based upon those outlined in the RMS' Technical Direction 2014/04a (Guide to Traffic Generating Developments - Updated traffic surveys), which are as follows:

- AM Peak Hour: 0.19 trips per unit
- PM Peak Hour: 0.15 trips per unit

Table 3: Existing and Predicted Traffic Generation

Scenario	FSR	No of Units	AM Peak (vph)	PM Peak (vph)
Current Traffic Generation (Surveyed July 2014)			120	89
Predicted Traffic Generation Compliant FSR Scheme	3.0 : 1	343	65	51
Predicted Traffic Generation Proposed FSR Scheme	4.0 : 1	457	87	69
Additional Traffic Generated by Proposed FSR Scheme (over and above existing traffic)			-33	-20

As outlined in **Table 3** above, a residential development of FSR 4.0 : 1 (approximately 457 units) is expected to generate a lower volume of traffic than the existing uses on the sites (20 - 33 fewer vehicle trips during the critical peak hours).

On the basis of the above, it is considered that a residential development of the scale of that proposed is generally supportable on traffic planning grounds.

Please contact the undersigned should you have any queries or require any further information regarding the above.



Yours faithfully,

traffix

Anne Coutts
Senior Engineer



ATTACHMENT A

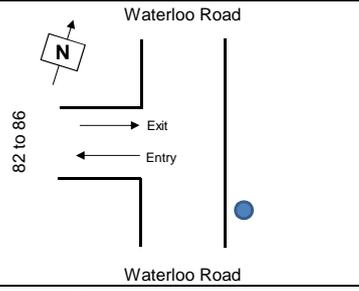
Results of Traffic Surveys

Intersection of 82-86 Waterloo Road, Macquarie Park

Friday, 25 July 2014

Austraffic

Survey Start **7:00 AM 16:00 PM**
 Intersection Type **2**
 Intersection No. **Waterloo Road**
 North Approach **82 to 86**
 East Approach **Waterloo Road**
 South Approach **Waterloo Road**
 West Approach
 Date **25/07/14**
 Classification **Light Heavy**



TIME PERIOD	VEHICLE MOVEMENT								
	Entry			Exit			GRAND TOTAL		
	Light	Heavy	Σ	Light	Heavy	Σ	Light	Heavy	Σ
7:00 - 7:15	9	0	9	0	0	0	9	0	9
7:15 - 7:30	14	0	14	0	0	0	14	0	14
7:30 - 7:45	11	0	11	1	0	1	12	0	12
7:45 - 8:00	16	1	17	3	1	4	19	2	21
8:00 - 8:15	26	0	26	1	0	1	27	0	27
8:15 - 8:30	30	0	30	4	0	4	34	0	34
8:30 - 8:45	29	0	29	3	0	3	32	0	32
8:45 - 9:00	24	0	24	3	0	3	27	0	27
Σ	159	1	160	15	1	16	174	2	176

TIME PERIOD	VEHICLE MOVEMENT								
	Entry			Exit			GRAND TOTAL		
	Light	Heavy	Σ	Light	Heavy	Σ	Light	Heavy	Σ
16:00 - 16:15	1	0	1	13	1	14	14	1	15
16:15 - 16:30	2	0	2	12	0	12	14	0	14
16:30 - 16:45	2	0	2	22	0	22	24	0	24
16:45 - 17:00	4	0	4	19	0	19	23	0	23
17:00 - 17:15	1	0	1	24	0	24	25	0	25
17:15 - 17:30	1	0	1	16	0	16	17	0	17
17:30 - 17:45	1	0	1	17	0	17	18	0	18
17:45 - 18:00	1	0	1	4	0	4	5	0	5
Σ	13	0	13	127	1	128	140	1	141

TIME PERIOD	VEHICLE MOVEMENT								
	Entry			Exit			GRAND TOTAL		
	Light	Heavy	Σ	Light	Heavy	Σ	Light	Heavy	Σ
7:00 - 8:00	50	1	51	4	1	5	54	2	56
7:15 - 8:15	67	0	68	5	1	6	72	2	74
7:30 - 8:30	83	1	84	9	1	10	92	2	94
7:45 - 8:45	101	1	102	11	1	12	112	2	114
8:00 - 9:00	109	0	109	11	0	11	120	0	120

Peak

TIME PERIOD	VEHICLE MOVEMENT								
	Entry			Exit			GRAND TOTAL		
	Light	Heavy	Σ	Light	Heavy	Σ	Light	Heavy	Σ
16:00 - 17:00	9	0	9	66	1	67	75	1	76
16:15 - 17:15	9	0	9	77	0	77	86	0	86
16:30 - 17:30	8	0	8	81	0	81	89	0	89
16:45 - 17:45	7	0	7	76	0	76	83	0	83
17:00 - 18:00	4	0	4	61	0	61	65	0	65

Peak