

1 August 2022

Our Ref: STH17/00220/45

Your Ref: PP-2021-837 (55387E/4)

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**PLANNING PROPOSAL 2021-837 – MOSS VALE ROAD NORTH URBAN RELEASE AREA
PLANNING PROPOSAL AND DRAFT DEVELOPMENT CONTROL PLAN CHAPTER– PUBLIC
EXHIBITION**

I refer to the email from the Department of Planning and Environment (DPE) on 2 June 2022 regarding the public exhibition of the above planning proposal (PP) and associated draft chapter NB4: Moss Vale Road North Urban Release Area of the *Shoalhaven Development Control Plan (DCP) 2014*.

TfNSW has completed a review of the information provided while focusing on the impact to the state classified road network (i.e. Moss Vale Road and the Princes Highway). TfNSW notes:

- the PP seeks to amend and add provisions to the *Shoalhaven Local Environmental Plan 2014* (SLEP 2014) to facilitate the development of the Moss Vale Road North (MVRN) Urban Release Area (URA). This includes, but is not limited to amendments to the land zoning, height of building, lot size, URA maps, etc (refer to **Attachment 1**);
- the PP will enable the development of between 2,380 dwellings up to 3,360 dwellings as well as a smaller business zone; and
- an external and internal traffic assessment (prepared by Bitzios Consulting dated 7 and 29 July 2020 respectively) has been prepared to support the PP.

TfNSW does not believe that sufficient information has been provided to enable it to adequately assess and ultimately support the PP and draft DCP Chapter in their current forms. TfNSW provides the comments in **Attachment 2** for Council's consideration and encourages further consultation, if required, to discuss the comments above.

If you have any questions, please contact me on 0418 962 703.

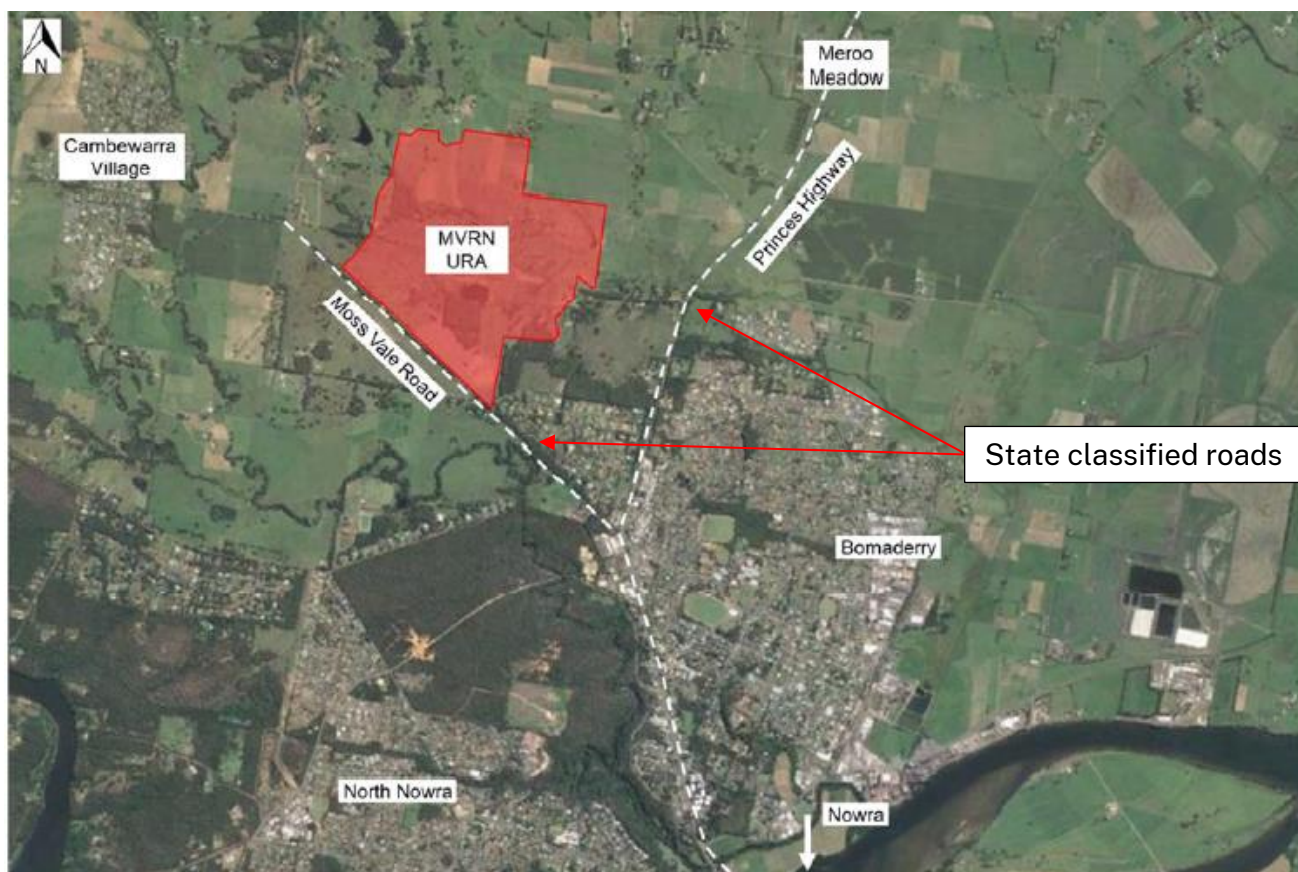
Yours sincerely



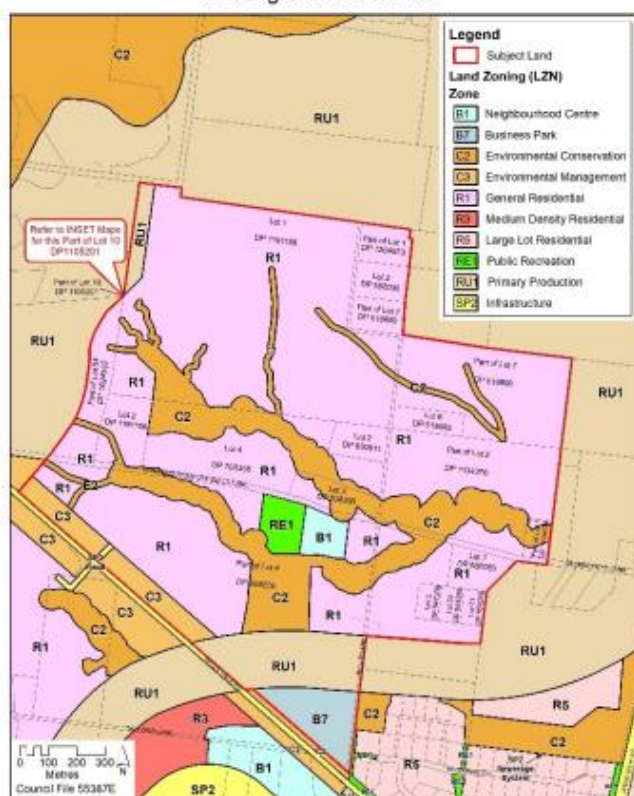
Andrew Lissenden

Development Case Officer, Development Services (South Region)

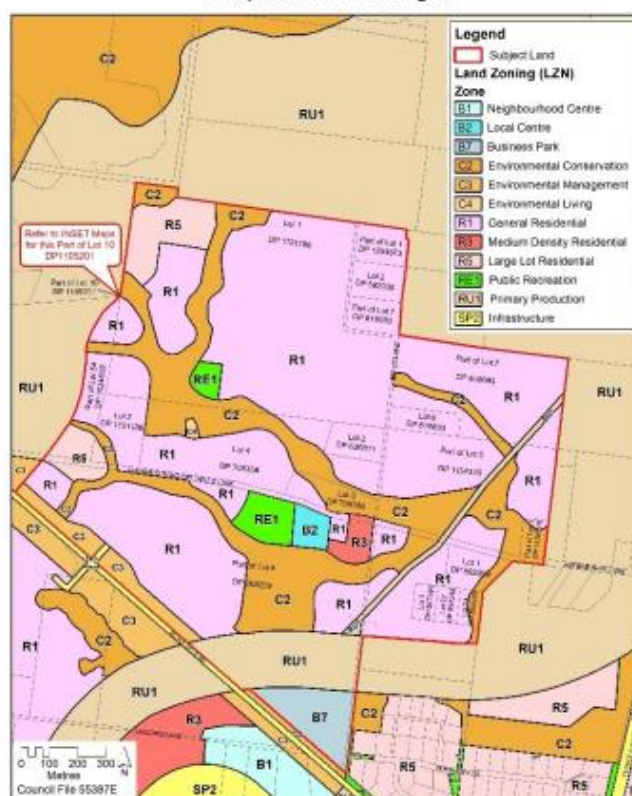
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Planning Proposal
Existing SLEP2014 LZN



Planning Proposal
Proposed LZN Changes



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1. Traffic Study: The external traffic analysis report (Ref: P4627.007R) and internal traffic analysis report (Ref: P4627.005R) submitted as part of the PP that were prepared by Bitzios Consulting in July 2020 will need to be updated to address the following:
 - a) they both only consider a lot yield of 2,515 dwellings (assumed in 2041) yet the PP allows for up to 3,360 new dwellings. The traffic analysis needs to consider 3,360 dwellings (i.e. maximum forecast dwelling yield);
 - b) the intersection of Bells Land, Moss Vale Road, and the Far North Collector Road is assumed to be a signalised intersection based on 2,515 dwellings in the Bitzios Consulting reports. TfNSW understands that Council is seeking to provide a single-lane roundabout at this intersection which will have less capacity than the signals detailed in the external traffic analysis. The traffic analysis needs to be updated to reflect what is going to be provided;
 - c) the modelling assumes 4 external connections at Central Boulevard, Bells Lane, Pestells Lane, and Boxsells Lane. The Bitzios Consulting report details that Pestells Lane and Boxsells Lane are assumed to be connections to the Princes Highway and provide access alternatives to Central Boulevard and Bells Lane, yet limited details have been provided on connecting infrastructure to either that will be provided as part of the PP and supporting draft DCP chapter. The PP and supporting draft DCP chapter need to address the provision of connecting infrastructure to Pestells Lane and Boxsells Lane as well as the likely traffic demand to use Pestells Lane as a connection to and from the Princes Highway;
 - d) how and when land will be preserved and obtained that is outside the PP area (e.g. land within Lot 2 DP 587163, Lot 4 DP 249085, and Lot 40 DP 1221735) to enable connection to Pestells Lane and any required widening of Pestells Lane as well details on what the appropriate treatment is at the intersection of the Pestells Lane connection with the Princes Highway for northbound traffic. Refer to Point 2 below for additional comments/requirements on the Pestells Lane connection;
 - e) the external traffic analysis only covers one mode of travel (travel by car) and is not a multi-modal transport analysis. It must also address/provide:
 - i) an assessment for public transport, walking, cycling, and micro-mobility (as it relates to external travel);
 - ii) an analysis of current and future demand for rail patronage and consideration of improved access to Bomaderry station by active, public, and private vehicle transport; and
 - iii) an analysis of future walking, cycling, and micro-mobility options based on demand and catchment analysis.
 - f) it is unclear how the development mix has informed the traffic generation, distribution, and assignment assumptions in the Bitzios Consulting report. If the strategic model (TRACKS) is not capable of 4 step modelling then a first principles approach could be employed based on an analysis of overall origin-destination (OD) trip patterns (agnostic of mode) and the theoretical person trip (PT), walking, cycling and micro-mobility catchments associated with the residential and non-residential development (assuming implementation of measures to encourage non-car transport).

2. *Pestells Lane Connection:* TfNSW notes that the draft DCP chapter details that road network upgrades including the external connection to Pestells Lane to enable access to and from the Princes Highway will be delivered via contributions obtained under the Shoalhaven Contributions Plan 2019. The draft DCP chapter is however silent on when the external connection to Pestells Lane will be delivered (i.e. as part of what stage). In addition, some of the figures in the draft DCP chapter show the Pestells Lane connection (e.g. Figure 34) while the majority of figures in the draft DCP chapter do not show the Pestells Lane connection to the Princes Highway.

TfNSW is of the view that:

- a) the Pestells lane connection to the Princes Highway should be provided as a priority (i.e. no later than Stage 2). This connection is important as it will enable direct access for residents to and from the Princes Highway if going to or coming from the north and in doing so, reduce traffic demand and associated pressure at the intersection of the Princes Highway and Moss Vale Road;
 - b) the Draft DCP chapter should identify when the Pestells Lane connection to/from the Princes Highway is to be provided and how it will be provided as a priority as well as providing clarification on how the Pestells Lane connection will be delivered noting the comments in Point 1 above; and
 - c) all figures within the draft DCP chapter should show the Pestells Lane connection to the Princes Highway.
3. *No of lots:* TfNSW notes that the PP will facilitate the provision of a dwelling yield within the MVRN URA of up to 3,360 new dwellings. It is also noted that Council advised TfNSW as part of seeking approval for the proposed single-lane roundabout at the intersection of Bells Lane, Moss Vale Road, and Far North Collector Road that the MVRN URA will have a maximum of 2,500 homes of which by 2036 it shall have reached between 50% and 55% of its total development (i.e. 1,365 lots by 2036 based on 55% of its total development). Both the above figures represent a lower yield than what this PP is seeking to provide.

It is unclear to TfNSW how the PP and associated draft DCP chapter will be able to contain development within the MVRN URA to the above number of lots by 2036 as advised by Council and on which the TfNSW approval for the Bells Lane, Moss Vale Road, and Far North Collector Road single lane roundabout was given. Further details are requested on how this will be undertaken including updated traffic modelling to demonstrate that the single lane roundabout will still have a satisfactory level of service based on the maximum dwelling yield that is now being sought.

4. *Reduction in C3 Environmental Management zone:* TfNSW notes that the proposal seeks to rezone a portion of the existing C3 Environmental Management zoned land adjacent to Moss Vale Road in Lot 4 DP 268209 to R1 General Residential zoned land (i.e. a reduction from a 75m width to a 45m width). The width of the proposed C3 zone land has been determined, in part, based on a Visual Impact Assessment.

TfNSW is currently investigating the need for potential road widening and associated land requirements along the Moss Vale Road Corridor. While the planning undertaken by TfNSW,

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at this time, has been to the east of Bells Lane, Moss Vale Road, and Far North Collector Road intersection and noting that it has no current plans for upgrades to the west of Bells Lane along the Moss Vale Road frontage of the MVRN URA site, TfNSW is supportive of the preservation of land within the C3 zoned portion until a clear understanding of what future upgrades is known. The PP should ensure sufficient land is preserved to enable the future widening of Moss Vale Road if and when required.

TfNSW does note that the Visual Impact Assessment prepared by Allen Price & Scarratts Pty Ltd and dated 5 April 2019 does not factor in any future upgrade works and widening of Moss Vale Road. As such, it has not included an assessment of the impact the widening of Moss Vale Road would have on the visual quality of the URA as viewed from Moss Vale Road. If this area is to be vegetated as part of a landscape corridor, future road works such as the widening of Moss Vale Road could have an impact on this landscape corridor.

In adopting a setback Council should be satisfied that sufficient land is preserved free of any encumbrances such as new vegetation buffers to enable the provision of a visual buffer so as to not limit the ability for improvement works to be undertaken. In this regard, TfNSW requests that any future local road infrastructure associated with the subdivision of Lot 4 DP 268209 as part of the MVRN URA be wholly located within the R1 zoned land and not encroach into the C3 zoned land.

5. Drainage Infrastructure: TfNSW notes that the draft DCP chapter details additional drainage infrastructure which includes the provision of bio-retention basins. One of the proposed bio-retention basins is shown to be located in the southeast corner of the URA adjacent to the intersection of Bells Lane, Moss Vale Road, and Far North Collector Road (refer to Figure 34). The location of this drainage infrastructure needs to have regard for the future expansion of this intersection should it be required. While TfNSW acknowledges that Figure 34 in the draft DCP chapter is diagrammatic, an associated statement should, at minimum, be included in the draft DCP chapter that further discussions are to be had with TfNSW before construction of this basin to confirm its location and land required for any future upgrades. Alternatively, sufficient land is made available at this intersection in line with the SIDRA modelling exercise undertaken for the Council by Bitzios as part of the Council's original proposal to signalize this intersection.
6. Staging: It is unclear to TfNSW how the draft DCP chapter will ensure the development is undertaken in the stages as detailed in Section 7.2 and Figure 3. TfNSW notes that the staging requirements as shown in Figure 3 are listed as an acceptable solution or one way of achieving the performance criteria of ensuring an "*orderly development and provision of necessary infrastructure*". TfNSW is concerned that due to the fragmented ownership of the land the development will not progress as per the identified stages in the draft DCP chapter.

Further details are requested by TfNSW on how future development will be required to comply with the staging as detailed in the draft DCP chapter and if it does not, how required infrastructure provision (e.g. road links to/from the Princes Highway, intersection upgrades) will be adjusted in terms of their timing for provision to ensure its delivery has not been delayed and/or compromised. It is important to note that contributions obtained under the Shoalhaven Contributions Plan 2019 may not be fully available should the required infrastructure need to be brought forward.

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7. Nowra Bypass: TfNSW notes that the PP preserves land for what Council has identified as a possible route for a future Nowra Bypass. The council should ensure that the PP does not encroach into the land that has been identified by it. This includes ensuring there is sufficient land available for any required service provisions, cut and/or fill, landscaping, sound walls, etc that would be required to enable the bypass.
8. Public Transport: TfNSW notes that while the draft DCP chapter contains details on public transport, it contains no reference to the *Guidelines for Bus Capable Infrastructure in Greenfield Sites*. The draft DCP chapter should include a reference to the requirements in the *Guidelines for Bus Capable Infrastructure in Greenfield Sites* and a provision that all future subdivision DA's lodged how they comply with the above guidelines.
9. Noise: Noting the increase in vehicular traffic along Moss Vale Road as a result of the development in the MVRN North and South URA's, Council should consider potential noise impacts on the future residential development and the need to identify appropriate measures to mitigate any impacts. The identification of measures during the PP stage is important to allow the Council to consider how the measures would be funded, if sufficient space is available, and enable the creation of appropriate planning mechanisms. TfNSW has been unable to locate any details on proposed noise mitigation measures for those dwellings located in close proximity to Moss Vale Road.
10. Internal Cycleways: TfNSW notes that the draft DCP chapter identifies a shared user pathway network within the MVRN URA. While TfNSW is supportive of this, the pathway network provided should be able to cater for pedestrians as well as cycling and micro-mobility. Provision for active transport early in the MVRN URA development will give residents transport choices beyond the need to drive a private vehicle for every trip. Based on the plan and sections provided for Collector Roads – Tier 1 and Collector Roads Tier 2 the width of the shared paths proposed (i.e. 1.5m to 2m) would not be sufficient to enable both pedestrian and cycle use. The desired minimum width of a shared path is 4.0m, allowing for safe overtaking and pedestrian interactions. The draft DCP chapter should ensure user path network for both cycle paths and shared paths are as set out in the TfNSW Design Toolbox (refer to - https://www.transport.nsw.gov.au/system/files?file=media/documents/2022/Cycleway-Design-Toolbox-Web_0.pdf).