

Our Ref: STH08/01313  
Contact: Andrea Boes 4221 2771  
Your Ref: 06\_0135



**Transport**  
Roads & Maritime  
Services

Department of Planning & Infrastructure  
GPO Box 39  
Sydney NSW 2001

Attention: Sally Munk

**SHOALHAVEN CITY COUNCIL – DEVELOPMENT PROJECT 06\_0135 – RESIDENTIAL & TOURIST DEVELOPMENT COMBERTON GRANGE, NOWRA – CONCEPT PLAN**

Dear Sir/Madam

Reference is made to your letter dated 29 October 2012 regarding the subject development project forwarded to the Roads and Maritime Services (RMS) for consideration.

RMS has reviewed the submitted information and provides the following comments:

- RMS recognises the potential benefits of the proposed development to the local economy, employment rates and tourism in the region. In this regard, RMS supports development that results in job creation and economic benefits to the South Coast, as long as appropriate road and transport infrastructure is provided to adequately cater for the impact of development on the surrounding road network.
- In regards to the current proposal, RMS objects to the development project in its current form. RMS objects to the proposed traffic signals at the intersections of the Princes Highway with Jervis Bay Road and Forest Road. In this regard, RMS provides the following comments:
  - Both intersections are within 100km/hr speed zones and traffic signals are not permitted within speed zones above 80km/hr in accordance with RMS' *Traffic Signal Design* guidelines. Driver judgement and response is more critical at higher speeds. The possibility of unsafe operation in regards to traffic signal directions is increased at higher speeds and driver safety is less certain, therefore, traffic signals are not permitted in speed zones above 80km/hr.
  - Maintaining the existing 100km/hr speed zone at this location is necessary to preserve the efficient movement of goods and services along the corridor. Reduction of the speed zone would have a large impact on commuters, particularly commercial commuters and would not be conducive to the strategic purpose of this section of the highway. RMS generally does not support the reduction of speed limits for isolated developments.

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- The Princes Highway at this location is a rural environment within which traffic signals are not appropriate and would not be intuitive for drivers. Within this environment signals would be unexpected and could create a potential road safety hazard. RMS considers that the existing 100km/hr speed zone is appropriate and that without changes to the road environment and adjacent land uses, a lower speed zone would likely lead to compliance and enforcement issues.
- Traffic signals are not consistent with RMS' strategy for the Princes Highway at this location. The Princes Highway provides a direct north-south link along the eastern coast of NSW. This corridor is included in the National Land Transport Network and is considered critical in its function of supporting economic growth and development on the South Coast. RMS has a vital interest to ensure that new developments do not adversely impact the capacity and ongoing operation of the highway.
- A roundabout at this location would equally be inappropriate in a 100km/hr speed zone, given the existing road environment and surrounding land uses, and would not be supported by RMS.
- Given the above, a grade separated interchange at the intersection of the Princes Highway and Forest Road would need to be provided to cater for the significant increase in traffic volumes through this junction as a result of the proposed development. This treatment is required to maximise road safety and traffic level of service through the intersection.
  - A grade separated interchange would separate conflict points between traffic movements and thereby provide a much safer access to the development than two signalised at grade intersections.
  - RMS notes our previous advice dated 4 July 2008 highlighting the need for a grade separated interchange to cater for the subject development. The design of the interchange would need to account for the current upgrade works along this section of the highway.
  - A concept plan of the grade separated interchange of the Princes Highway and Forest Road should be provided including property boundaries. If the treatment does not fit within the existing road reserve the applicant should attain suitable agreements with affected property owners to ensure that the works can be completed pending approval.
  - RMS notes that the cost of the interchange would likely be significantly higher than the estimated \$1.51 million stated in Section 7.1 of the Traffic Impact Assessment (TIA) carried out by Lyle Marshall & Associates.
- RMS advises it would not provide the necessary approvals required under Section 87 and Section 138 of the Roads Act, 1993 for the proposed traffic signals on the Princes Highway.
- In regards to the estimated traffic generation of the proposed development, RMS provides the following comments:
  - Traffic generation rates for the hotel and serviced apartment components should be based on 100% occupancy.
  - RMS disagrees with the statement in Section 3.3 of the TIA that '*all traffic generated by the proposed tourist residential development will be to and from Nowra Bomaderry*'. Justification should be provided for this assumption.

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- RMS disagrees with the statement in Section 4.1 of the TIA that the anticipated residents 'are not likely to have work commitments in Nowra or the surrounding area to require a daily pattern of travel to work'. This assumption should be justified and modelling should be based on a worst case scenario.
  - In reference to Section 4.3 of the TIA, estimated car occupancy rates for the subject development should be justified including the reasons for a person per vehicle rate of 3 for the subject development which is significantly higher than the estimated 2.14 persons per vehicle based on the survey of visitors to the Nan Tien Temple in 2009.
  - Justification should be provided for the assumption that 50% of shop owners will live within the development.
- RMS would not object to an emergency access arrangement from the subject site to Forest Road via the existing quarry, or via Comberton Grange Road. This access would need to be locked with vehicular access only available from the subject site during emergency situations.

RMS highlights that in deciding whether or not to approve the project application under Part 3A of the Environmental Planning and Assessment Act, 1979, it is the Minister's responsibility to consider the environmental impacts of any road works which are ancillary to the development. This includes any works which form part of the proposal and/or any works which are deemed necessary to include as requirements in the conditions of any development consent. Depending on the level of environmental assessment undertaken to date and nature of the works, the Department may require the developer to undertake further environmental assessment for any ancillary road works.

RMS is happy to discuss the subject development proposal further with the applicant, Council and the Department. To discuss further, please contact Andrea Boes on 4221 2771.

Yours faithfully



Brian Lefoe  
Road Safety and Traffic Manager  
Network Management, Southern Region

11 DEC 2012

Cc – The General Manager, Shoalhaven City Council (via email, Attention: John Britton)

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