

M^CLAREN TRAFFIC ENGINEERING

Address: Shop 7, 720 Old Princes Highway Sutherland NSW 2232
Postal: P.O Box 66 Sutherland NSW 1499

Telephone: (02) 9521 7199
Web: www.mclarenttraffic.com.au
Email: admin@mclarenttraffic.com.au

Division of RAMTRANS Australia ABN: 45067491678 RPEQ: 19457

Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

28 August 2026

Reference: 260661.01FA

Lysand Pty Ltd & Lyrock Pty Ltd
c/- CivPlan
390 Princes Highway
Bomaderry NSW 2541
Attention: Theo Prakash

LETTER OF RESPONSE TO COUNCIL'S COMMENTS REGARDING THE PLANNING PROPOSAL FOR A CHANGE OF ZONING AT WARRA WARRA ROAD, SOUTH NOWRA

Dear Theo,

Reference is made to your request to provide a letter of response regarding the proposed planning proposal for a change of zoning at Warra Warra Road, South Nowra, with proposed zoning plans and an indicative amended subdivision layout plan depicted in **Annexure A** for reference. This letter is in response to Shoalhaven City Council's comments within a letter dated 16 July 2026 for Planning Proposal reference PP-2026-1362. The comments made by Council relevant to traffic and parking are shown below (*italicised*) with M^CLaren Traffic Engineering's (MTE) response thereafter.

1 Executive Summary

At the outset, it should be noted that this application is a planning proposal for a change of zoning over a portion of Lot 224 DP 755952 and Lot 2 DP 1126288, not a development application (DA). Any application for later subdivision of the land will be subject to a development application and relevant design processes.

In summary the key points of this response letter are:

- The concept plan has been amended such that Old Southern Road will be designed to minimise access points and can achieve Council's design requirements for a Collector Road (Tier 1) (Local Distributor Road).
- The existing site is already zoned for commercial use (*E3 – Productivity Support*), only the eastern portion of the site is proposed to be rezoned *C2 – Environmental Conservation* and *R1 – General Residential*.
- The TIA provided is adequate for the scale of the rezoning proposal, which changes the zoning of the eastern portion of the development site only.
- Access between Old Southern Road and Warra Warra Road is not required to support any residential development on the eastern portion of the site.

2 Table of Contents

Given the length of this response letter, a table of contents has been prepared below for reference.

1	EXECUTIVE SUMMARY	1
2	TABLE OF CONTENTS	2
3	RESPONSE TO ATTACHMENT 1: SUMMARY OF KEY CONCERNS	3
4	RESPONSE TO ATTACHMENT 2: INTERNAL REFERRAL RESPONSES	4
4.1	Strategic Road Network and Access Issues	4
4.1.1	Two Access Points (Fire)	4
4.1.2	Two Access Points (Flood).....	5
4.1.3	Nowra Bomaderry Structure Plan – Preferred Road Network	5
4.1.4	Warra Warra Road – Secondary Access	6
4.1.5	Nowra Key Roads Strategic Overview.....	7
4.1.6	Scope of the rezoning proposal	7
4.2	Compliance with DCP (road network).....	7
4.2.1	NBSP “preferred road network”	7
4.2.2	Lot access to Lower Order Roads	8
4.3	Other Concerns noted from review of the Traffic Impact Assessment	9
4.4	Other Relevant Concerns	13
4.5	Other Aspects such as Active Transport, Public Transport, Road Layout and Internal Road Design	14
4.6	Conclusion.....	14
5	CONCLUSION	15

3 Response to Attachment 1: Summary of key concerns

This section provides a response to the items raised in Attachment 1 of Council's letter relevant to traffic and parking matters associated with the planning proposal.

The Traffic Impact Assessment provided should be updated, addressing the following key concerns:

MTE Response: The Traffic Impact Assessment (TIA) can be updated with the minor updates requested. A full TIA will also be prepared as part of the future development application for the subdivision of the subject land.

- *Given the flood and bushfire risk associated with the site, a suitably designed upgrade of Warra Warra Road should form a very necessary safe and efficient access to/from the development area to the Highway, as an important secondary access to the site.*

MTE Response: The site provides secondary access to the Kookaburra Way and onto Firetrail Street. There is no need to upgrade Warra Warra Road to support safe and efficient access during an emergency as two access points are provided.

- *Until the fundamental and significant issue of road network connectivity is addressed in the first instance the following will also be required to be reviewed and addressed as part of an updated TIA:*

MTE Response: An updated TIA will be prepared as part of the development application for the relevant subdivision application.

- *Minimising the number of intersections to Old Southern Road*

MTE Response: The revised subdivision layout concept plan has minimised the number of intersections with Old Southern Road, reducing the proposed new connections to only two (2). This will be formalised during the subdivision development application.

- *Applying DCP Road Typologies for all roads,*

MTE Response: The DCP road typologies are implemented into the concept subdivision attached in **Annexure A**. Old Southern Road has a 25m reserve width to comply with the Collector Road (Tier 1) typology, with the perimeter roads 23-23.5m satisfying the Collector Road (Tier 2) typology. Internal roads satisfy the Access Street (Tier 2) road typology with a 16m road reserve width. Road design including carriageway widths will be developed during the subsequent development application stage.

- *Inclusion of Active Transport*

MTE Response: Active transport including the provision of footpaths and shared paths (if necessary), will be included in the design associated with the subdivision development application. Active transport provision will be provided in accordance with the relevant DCP road typology requirements.

- *Integrated Public Transport*

MTE Response: The future subdivision will be designed to accommodate the public transportation integration, which will primarily be the extension of the existing local bus network. As identified in the submitted TIA, the existing *101 - East Nowra & Worrigee to Nowra (Loop Service)* Bus Route currently travels down Firetrail Street and Old Southern Road to Wattlebird Road.

The 101 bus route can be easily extended further south into the subdivision once sufficient demand exists. The subdivision design will facilitate bus access during development application stage.

- *Resolving internal road network design.*

MTE Response: The internal road network has been resolved to minimise connection points to Old Southern Road which has been provided a 25m wide road reserve suitable to accommodate a Collector Road (Tier 1) road typology. The concept plan provided in **Annexure A**, achieves the necessary road reserve widths to satisfy the road network design in accordance with council's road typologies. During the formal subdivision development application, the design of the road network will ensure the road typology characteristics are achieved as outlined in the Shoalhaven DCP 2014 Subdivision Technical Guidelines.

*Several specific amendments and detailed advice are outlined in the Traffic Engineer's referral comments in **Attachment 2** to this letter.*

4 Response to Attachment 2: Internal referral responses

This section provides a response to the items raised in Attachment 2 of Council's letter from the Traffic Engineer at Council, relevant to traffic and parking matters associated with the planning proposal.

We have considered the information provided, including the Flood Impact Assessment and the Traffic Impact Assessment, and raise the following key concerns at this stage.

4.1 Strategic Road Network and Access Issues

4.1.1 Two Access Points (Fire)

- *Planning for Bush Fire 2019 typically requires two access points to a development. However, if the residential component goes ahead as indicated (currently showing no access to Warra Warra Road) there is only one strategic access point to the development site (from Old Southern Road). This is unacceptable. The connection to Warra Warra Road as planned needs to be provided to ensure the minimum required number of access points to the development is provided to ensure the safest possible planning for bush fire.*

MTE Response: Planning for Bush Fire Protection 2019 (PBP 2019) states the following relevant performance criteria regarding access points:

Performance Criteria

- *Firefighting vehicles are provided with safe, all-weather access to structures.*

Acceptable Solutions

- *Subdivision of three or more allotments have more than one access in and out of the development.*
- *Where access/egress can only be achieved through forest, woodland and heath vegetation, secondary access shall be provided to an alternative point on the existing public road system;*

The proposed subdivision concept provides two access points, comprising access via Old Southern Road and a separate connection to Firetrail Street via Kookaburra Way. Accordingly, the requirement for more than one access point is satisfied from a traffic engineering perspective.

Access and egress from the proposed subdivision is not dependent on travel through forest, woodland or heath vegetation. Accordingly, the specific requirement for secondary access arising from access through these vegetation types does not apply.

On that basis, PBP 2019 does not establish a requirement for an additional access connection to Warra Warra Road from a traffic perspective.

4.1.2 Two Access Points (Flood)

- *Further, Section 9 (Conclusion) of the Flood Impact and Risk Assessment report also states (page 48 of 48) that:*

“There is safe and reliable access to and from the east and west of the proposed developable site from the 1% AEP. Additionally, most of the site is outside the PMF flood extent with safe and orderly evacuation of people possible from the east and west developable site for the PMF design event.”

MTE Response: The detailed flood and evacuation conclusions are addressed within the Flood Impact and Risk Assessment. From a traffic perspective, the proposed subdivision provides two access points to the north, comprising access to Old Southern Road and a separate connection to Firetrail Street via Kookaburra Way.

- *However, if the residential component goes ahead as indicated there is only one strategic access point to the development site (from Old Southern Road), not the multiple access points required as indicated in the Flood report.*

MTE Response: The proposed subdivision provides two access points, comprising of one connection to Old Southern Road and a second to Firetrail Street via Kookaburra Way. Accordingly, the proposal is not reliant on a single access point from Old Southern Road.

4.1.3 Nowra Bomaderry Structure Plan – Preferred Road Network

- *Further the Nowra Bomaderry Structure Plan (NBSP) has provided the overarching guidance of development planning in Nowra Bomaderry urban area since it's approval by the State Government in 2008.*

MTE Response: This comment is noted.

- *The NBSP included a plan of a “preferred road network” which was appendix to the NBSP that was developed to support the growth envisaged under the NBSP. In the subject area, that included the extension of Old Southern Road to Warra Warra Road and the upgrade of Warra Warra Road to the Princes Highway.*

MTE Response: An extract of the Map 6.1 - Proposed Road Network from the Nowra Bomaderry Structure Plan, is provided below in **Figure 1**. It should be noted there is no specific mention or indication of any upgrade to Warra Warra Road within the NBSP.

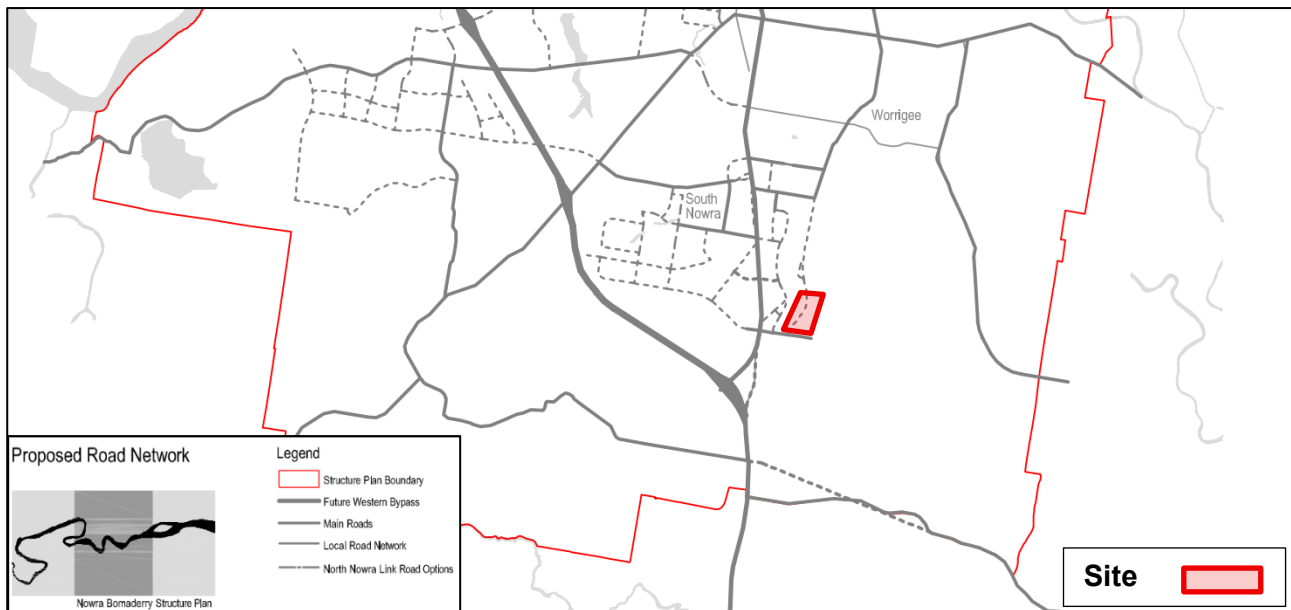


FIGURE 1: EXTRACT FROM PROPOSED ROAD NETWORK – NBSP 2008

To achieve the planned upgrade of Old Southern Road and Warra Warra Road, successive developments to the north have had setbacks imposed, no direct access has been allowed to the Old Southern Road, and access points to Old Southern Road have been minimised and controlled through roundabouts. This model of development has been controlled and effective to date and is to continue to south, through the subject development area. However at this point this same model of development has not been demonstrated through the plans provided, which is a significant shortcoming, and is to be addressed.

MTE Response: The amended subdivision design has been attached in **Annexure A** and indicates that Old Southern Road will no longer provide direct access to residential lots, similar to other subdivision developments north of the subject site. Access points to Old Southern Road will be limited and this will be formalised in the DA subdivision design. These details can be finalised at the development application stage to achieve Council's preferred road typology for Old Southern Road and other internal roads.

4.1.4 Warra Warra Road – Secondary Access

- *Given the flood and bushfire risk associated with the site, a suitably designed upgrade of Warra Warra Road should form a very necessary safe and efficient access to/from the development area to the Highway, as an important secondary access to the site, and consistent with the NBSP.*

MTE Response: A secondary access to Warra Warra Road is not proposed and is not considered necessary to provide safe and efficient access from the development. Old Southern Road will be developed in a consistent manner to the NBSP as part of the DA subdivision design to support a future development application and Old Southern Road will be available to connect to Warra Warra Road as required by future through traffic demand.

4.1.5 Nowra Key Roads Strategic Overview

- *The Nowra Key Roads Strategic Overview Strategy also formerly identified the extension of Old Southern Road to the Highway (via Warra Warra Road) as a critically important road infrastructure upgrade to support the expansion of development to the east of the Highway, however the initial adopted strategy kept an optimistic focus on shorter timeframes on other higher order road projects initially (whilst development continues to occur south along Old Southern Road, with development delivering the necessary incremental upgrades of the road southwards). The next iteration of the Nowra Key Roads Strategic Overview Strategy is likely to re-introduce Old Southern Road as a key deliverable, pursuant to the objectives of the NBSP).*

MTE Response: The Nowra Key Roads Strategic Overview (May 2017) does not provide any qualification as to the Old Southern Road extension being a critically important road infrastructure upgrade. The connection of Old Southern Road is a line indicated on the “Key Projects – Overview” map. The prioritisation and delivery of these broader projects is a matter for Council’s strategic infrastructure planning.

4.1.6 Scope of the rezoning proposal

- *Accordingly, the Traffic Impact Assessment to date misses most of these strategic marks, and is to be updated to assess “all” components of the rezoning proposal, not just the residential component, and is to assume the connection to the upgrade of Warra Warra Road, including the treatment of Warra Warra Road and Old Southern Road as both Tier 1 Collector Roads (sub-arterial) as a continuous link through to the Highway, to be achieved with the development of the subject land. This may be staged, but if staging is proposed, the proposed staging must also be addressed and assessed as part of the updated TIA.*

MTE Response: The submitted TIA covers all the relevant components of the rezoning proposal. The entire site is currently zoned *E3 – Productivity Support* under the *Shoalhaven Local Environment Plan (LEP) 2014*. The only portion of the subject site that will be rezoned is the eastern portion of the site which will be a combination of *C2 – Environmental Conservation*, which is not a traffic generating land use and *R1 – General Residential*, which has a lower traffic generation intensity than the existing *E3 – Productivity Support* land use. This is the fundamental land-use change associated with the rezoning proposal that needs to be considered.

While the ultimate road design of the proposed future subdivision is a matter for design during the development application stage, the analysis clearly indicates a connection of the extended Old Southern Road to Warra Warra Road is not necessary to support the subject residential development. Provision will be made to design Old Southern Road to Collector Road (Tier 1) status as part of the design of the subdivision associated with a later DA.

4.2 **Compliance with DCP (road network)**

4.2.1 NBSP “preferred road network”

- *Pursuant to the NBSP “preferred road network”, Old Southern Road is to be treated as a Collector Road (Tier 1) or sub-arterial road.*

MTE Response: The revised subdivision concept plan has been prepared to support the rezoning (**Annexure A**). As shown in this revised concept plan, the subdivision can accommodate the design of Old Southern Road as a Collector Road (Tier 1) with a 25m road corridor provided. Further design details of the Old Southern Road will be prepared at the DA stage.

4.2.2 Lot access to Lower Order Roads

- Council's DCP requires that Lots are designed to favour access to lower order roads where available. Direct access to Collector (T1) roads will not be supported where alternative access can be provided to a lower order road.

MTE Response: The revised subdivision concept plan prepared to support the rezoning (**Annexure A**) provides all lots with access to lower-order roads. No direct residential access to Old Southern Road is proposed in this revised concept plan.

- To protect the integrity, safety, and efficiency of Old Southern Road as a main road in Council's road hierarchy, the number of intersections is to be minimised, and only internal Collector roads are to intersect with Old Southern Road. In regard to the subject residential component of the development, this will be accepted in three (3) locations, at the far northern extent of the development (intersection of Old Southern Road and Kookaburra Way), and the far southern extent of the development (intersection of Old Southern Road and Warra Warra Road), and at an agreed midpoint along the developments frontage to Old Southern Road. Those 3 intersections are to be roundabouts, similar in standard to the existing roundabouts built by adjoining developments to the north of the site.

MTE Response: The revised subdivision concept plan prepared to support the rezoning reduces the number of proposed intersections to two (2) intersections, with the existing Kookaburra Way intersection already constructed.

Two (2) new intersections will be provided, with one at a mid-point and another at the southern end of the subdivision. The development of the Kookaburra Way / Old Southern Road intersection has been completed by others and has not made provision of a roundabout. As shown in **Figure 2** below, adopting the same dimensions as the Casa Circuit roundabout to the north, the lots located to the north-east of the intersection are not set-back far enough to facilitate a standard roundabout design in this location without impacting adjacent properties.



FIGURE 2: HIGH-LEVEL SKETCH OF OLD SOUTHERN ROAD / KOOKABURRA WAY ROUNDABOUT POSSIBLE DIMENSIONS

Upon completion of the future Warra Warra Road connection, the Kookaburra Way intersection could be closed or restricted to left-in/left-out if considered necessary. In the interim, no further treatment is required here, beyond the formalisation of this T-intersection which will occur during the design of the subject subdivision during the official development application. Likewise, the intersection at the far south of the subdivision, can be closed upon the completion of the link to Warra Warra Road or made into a roundabout if necessary.

- *A roundabout is also preferred access treatment where the proposed commercial component of the site intersects with Warra Warra Road, to manage traffic safely and efficiently at this location, to immediate east of the Highway.*

MTE Response: This point is not directly relevant to the subject rezoning. The zoning of the western portion of the site is not changing and any access to this side of the site will be subject to separate development application at such time when future development is proposed.

4.3 Other Concerns noted from review of the Traffic Impact Assessment

- *Section 1.4 of the TIA (Site Context) provides maps on pages 3 & 4 of 38 (identifying the “rezoning area”). These maps confirm that the assessment has been limited to the residential component of the proposed rezoning only, not the full site, which is a shortcoming of the study. The TIA needs to assess the full potential for all components of the proposed rezoning including both the residential and commercial components.*

MTE Response: The lots subject to this rezoning are already zoned E3 – Productivity Support. There is no proposed change to the existing zoning on the western portion of the site, and hence it is not necessary to consider this portion of the site within the assessment.

- *Section 2.3 of the TIA (Existing Traffic Environment) on page 7 of 38 also confirms that despite the total area of the proposed rezoning (which includes frontage to the Princes Highway) and contrary to the NBSP (which identifies the extension of Old Southern Road to Warra Warra Road continuous through to the Highway) Section 2.3 confirms that the TIA has to date only assessed the residential component of the proposal, and has only assessed intersection to the north of the site along Old Southern Road (there has been no broader traffic impact assessment including examining the impacts to the Princes Highway, and comparing the existing plus proposed rezoning proposals) which is a shortcoming of the current study.*

MTE Response: It is reiterated that the E3 – Productivity Support zoning over the western portion of the site is existing and not proposed to be changed under this planning proposal. The scope of the TIA is sufficient with a focus on Old Southern Road, as this will be the primary access for the subject residential lots which are a result of the rezoning.

The eastern portion of the site does not require any access to Warra Warra Road in order to operate satisfactorily. Provision will be made for Old Southern Road within the site to be designed and built as a Collector Road (Tier 1) to support Council’s further vision of Old Southern Road.

- *Section 2.3.3 of the TIA (Future 2025 No Development) on page 11 of 38 claims that the existing intersection of Old Southern Road/Hillcrest/Avenue/Isa Road will fail and will require and upgrade to accommodate broader background growth along (i.e. – under the scenario with “no development of the subject land”). Given that there is no Contributions Plan or any other current identified funds to upgrade the intersection in the near future, this claim confirms that an alternative road access is required to mitigate the adverse impacts of the proposal on the existing road network (i.e. this claim demonstrates that not only is an alternative access road required to address bush fire and flood risk, but also required to more broadly distribute the developments traffic, so that 100% of the developments traffic is not impacting the Old Southern Road corridor, which is nearing capacity at the subject intersection, according to the proponents TIA).*

MTE Response: Level of Service ‘B’ and ‘C’ represent a satisfactory level of performance, and the TIA does not state that this intersection fails. The TIA shows that the intersection’s performance does not materially worsen as a result of the proposal. The absence of a current contributions mechanism for this intersection does not alter the assessed traffic impact of the subject rezoning.

The Old Southern Road / Isa Road / Hillcrest Avenue will operate an overall Level of Service “B” in 2035, with a noted worst movement Level of Service “C” during the AM peak hour assuming 2% p.a. background growth over 10-years without the development. With the proposed development in 2035 the intersection of Old Southern Road / Isa Road / Hillcrest Avenue will still operate with an overall Level of Service “B” and worst movement Level of Service “C”. The modelling demonstrates that the proposed rezoning does not change the overall intersection Level of Service or the worst performing movement.

Only 25% of the site’s estimated future traffic generation is expected to utilise the Old Southern Road / Isa Road / Hillcrest Avenue intersection. The provision of an alternative southern access would not materially reduce the development related traffic at this intersection, as the majority of vehicles using this route would receive no practical benefit from a connection to the Princes Highway via Warra Warra Road.

- *Section 4 of the TIA (Traffic Assessment) confirms that; no assessment of the commercial component has been undertaken, and no distribution of the traffic via Warra Warra Road has been undertaken, shortcomings of the assessment.*

MTE Response: No change is proposed to the western commercial component as part of this rezoning proposal. Any development of the existing zoned commercial component of the site, will be subject to assessment in accordance with a standard development application at that stage. Thus, the rezoning application is only for the eastern portion of the site and therefore does not require further assessment of the western commercial component.

- *In the last Para of Section 4.3 of the TIA (Traffic Impact) the TIA states that if Councils wants to extend Old Southern Road to the Princes Highway, it is up to Council fund the required upgrades to achieve it. This is not agreed. Whilst Council may be responsible for “through traffic” component, the proposed road extension proposal itself was fundamentally includes as part of the 2008 approved NBSP road network, consequently, the extension of the road and its connection through to the Princes Highway must be included in the development of the subject land. It is accepted that the traffic assessment could consider the scenarios of development traffic only as well as a “plus through traffic” scenario. However, at this point the TIA has not addressed either scenario, a shortcoming of the current TIA.*

MTE Response: The amended subdivision concept plan indicates the Old Southern Road extension will be designed and implemented to a Collector Road (Tier 1) typology to facilitate future access. The application demonstrates access to Warra Warra Road is not required in order to support the residential component of the development that is being rezoned as part of this application.

- *Section 4.4 and 4.5 of the TIA (Traffic Impacts of Rezoning, and MTE Responses to SEPP Transport & Infrastructure) is not agreed. There has been no traffic impact assessment undertaken of the commercial component of the proposal (which, without the Old Southern Road extension) will 100% impact the Highway. This section of the TIA claims that the Highway will benefit by not having a connection between Old Southern Road and Warra Warra Road, however this has not assessed the broader road network holistically (as one key example the TIA states that the development will distribute 75% of its traffic via Quinns Lane, yet has not undertaken any traffic impact assessment of this additional traffic at the Highway and Quinns Lane intersection, a significant shortcoming), where as a road connection to Warra Warra Road will allow a broader distribution of traffic across the wider network. Previous traffic modelling exercises undertaken to support the NBSP saw the benefits of the Warra Warra Road connection to allow a broader distribution of traffic, which benefited the Princes Highway more broadly. Whereas the proposal presented in the current TIA seeks to close the road connection for its own purposes only, without undertaking any assessment of the commercial components impacts at the Highway/Warra Warra Road, nor without undertaking a traffic impact assessment of its 75% of impacts at the Highway/Quinns Lane intersection. This is a deviation from the NBSP that is not agreed and consequently, due to these significant shortcomings the current TIA is not supported.*

MTE Response: The proposal is only for a rezoning; it is not a development application. The western commercial component remains unchanged, and with consideration to Council’s desired future road network the majority of the traffic associated with the commercial component would be expected to directly access the Princes Highway irrespective of any connection to Old Southern Road.

The per 100m² traffic generation the residential land use is estimated at 0.13 peak hour trips per 100m² site area, compared to an estimated 0.71-1.4 peak hour trips per 100m² site area, as identified in the submitted TIA and based on comparison of land-use traffic generation potential. The change in zoning will result in a net reduction in possible traffic generation from the site.

And extending from that the traffic generation impacting Quinns Lane would be less under the proposed residential zoning, then would be considered under the existing business zoning. Nonetheless, an assessment of the performance of the Quinns Lane / Princes Highway intersection will be completed as part of the TIA that will accompany the future development application and design of the subdivision.

The Warra Warra Road connection to Old Southern Road is still able to be delivered to accommodate the benefits to the Princes Highway, however this link is not needed to support the function of the proposed rezoning of the eastern portion of the site to *R1 – General Residential*. The residential component alone does not necessitate any connection to Warra Warra Road.

- *In relation to Section 5 of the TIA (Response to Council Comments) it is not considered necessary or appropriate at this stage to respond to every point, however needless to say many of these comments are not agreed (for the same reasons as outlined above). This section of the TIA makes it clear that no road connection is proposed between Old Southern Road and Warra Warra Road, however this very aspect of the proposal is not agreed, and constitutes a significant shortcoming of the current proposal, and it's associated supporting studies.*

MTE Response: A future connection between Old Southern Road and Warra Warra Road remains capable of being delivered as part of the broader strategic road network but is not necessary to support the subject rezoning. There is no change to the zoning of the western portion of the site.

- *Like the above, In relation to Section 6 of the TIA (Response to TfNSW comments) many of these comments are not agreed (for the same reasons as outlined above). The most concerning shortcoming of the TIA is that the current TIA states that 75% of it's traffic will impact the Princes Highway/Quinns Lane intersection, yet there has been no traffic impact assessment of this additional traffic at this location. This is likely to be of concern to TfNSW. What is also likely to be of concern to TfNSW is that there has been no assessment of the commercial traffic (of which 100% will not directly impact the Princes Highway/Warra Warra Road intersection) with no assessment undertaken. The current proposal (not to connect to Warra Warra Road) is a very significant deviation from the proposal that was originally assessed, consequently the current proposal should be referred to TfNSW for fresh review and comment of the current proposal.*

MTE Response: The subject site has an existing *E3 – Productivity Support*, “commercial” zoning. There is no proposal to change this zoning of the western portion of the site and hence there is no requirement to assess this commercial traffic at this planning proposal stage. The commercial traffic of this portion of the site and assessment of any impact on the Princes Highway / Warra Warra Road intersection will be completed when a development application is lodged for any development on the western portion of the site and would include a Transport Impact Assessment (TIA). The rezoning does not impact the zoning adjacent to the Princes Highway. Any proposal that triggers referral to TfNSW will be done so in accordance with standard practices for development applications or planning proposals.

- *Like the above, the Conclusions drawn in Section 7 of the TIA are not agreed, due to the many shortcomings of the TIA outlined above.*

MTE Response: As described above, the conclusions of the TIA are appropriate for the scope of the rezoning proposal assessed.

4.4 Other Relevant Concerns

- *A TIA is to be prepared in accordance with the requirements of TfNSW's "Guide to Transport Impact Assessments TS 00085 – Version 1.1"*

MTE Response: The TIA has been prepared in accordance with the *Guide to Transport Impact Assessments* (GTIA) version 1.1.

- *It is noted that Transports TIA guidelines require prior consultation with Council and TfNSW from the outset ("if" the proposal is going to be further considered, we would suggest this consultation should occur upon re-engagement of a traffic consultant to address the issues raised by both TfNSW and Council, prior to any further data collection to agree on a revised study scope and methodology, before any further work is commenced on the preparation of a revised traffic study.*

MTE Response: With respect to the suggestion that prior consultation with Council and TfNSW is required, the GTIA does not identify early consultation as a mandatory requirement. Page 3-7 of the GTIA states:

"Early consultation before undertaking the TIA is optional, although an encouraged step..."

Accordingly, while early consultation is encouraged, it is not a prerequisite to the preparation of a TIA under the GTIA.

Consultation has nevertheless occurred with Council through the previous assessment of an earlier Planning Proposal on the subject site. Council provided detailed comments during that process, which have been considered and addressed in the TIA.

It is important to distinguish the level of assessment appropriate to a Planning Proposal from that required for a subsequent development application. The current proposal seeks to rezone part of the site and does not seek approval for a specific subdivision layout or development outcome. The traffic assessment has been prepared at a level considered appropriate to the strategic planning stage.

The proposed rezoning would facilitate a land use with lower traffic-generation potential than could otherwise occur under the existing *E3 – Productivity Support* zoning applying to the eastern portion of the site. Further traffic data collection or preparation of an entirely revised traffic study is not necessary to establish the traffic implications of the proposed rezoning.

As part of any future development application for a subdivision on this land, a further traffic assessment would be undertaken. At that stage, the assessment can respond to the specific development proposed, including subdivision layout, access and traffic generation along with any required intersection or network assessment.

- *This is relevant because come aspects of the current TIA (including the proponent proposing to not connect Old Southern Road to Warra Warra Road, but not assessing the impacts of this change on the Princes Highway/Quinns Lane intersection or not assessing the impact of the commercial component of the proposal on the Princes Highway/Warra Warra Road intersection) these aspects would never have been agreed to. Prior consultation to renewed TIA is a requirement and strongly recommended to also agree on any further data collection parameters and assessment methodology.*

MTE Response: The proposal is revised to enable council to connect Old Southern Road to Warra Warra Road in the future as required. The Princes Highway / Quinns Lane intersection can be assessed at the development application stage for the future subdivision.

The commercial component on the western portion of the land (currently zoned *E3 – Productivity Support*), is not proposed to change as part of this application for rezoning a separate portion of the land. The impact of any development of the commercial development on the Princes Highway / Warra Warra Road will be subject to an assessment at the time of any future development application impacting the commercial portion of that land.

4.5 Other Aspects such as Active Transport, Public Transport, Road Layout and Internal Road Design

Other aspects such as Active Transport, Public Transport, Road Layout and Internal Road Design

- *Given the short timeframe to turn around comments on the current proposal and associated studies, the most fundamental and significant issue to point out is the proposed change to the road network connectivity which is not agreed, nor has there been an assessment for all of the development components, nor any traffic impact assessment at the Princes Highway intersection of Warra Warra Road and Quinns Lane, and the treatment of Old Southern Road in the TIA as a local road (not a Collector Tier 1 Main Road as envisaged under the NBSP) all needs to be addressed in the first instance.*

MTE Response: These matters are relevant to a development application and will be addressed at that stage. The revised concept plan (**Annexure A**) indicates changes to the subdivision concept design to ensure Old Southern Road can accommodate a design at the level of a Collector Road (Tier 1) as per Council's request under the NBSP. The zoning of the western commercial component is unchanged, and accordingly, further assessment of that component is not considered necessary as part of the subject rezoning.

- *That said, until a more fundamental and significant issue of road network connectivity is addressed in the first instance, other aspects which also required attention (such as minimising the number of intersections to Old Southern Road, Road Typologies for all roads, Active Transport, Public Transport, and internal road network design), will also be required to be reviewed and addressed, in due course, as part of an updated TIA.*

MTE Response: It is reiterated that this is a planning proposal for a rezoning not a development application for a subdivision, which will be prepared at the time a development application is lodged. The amended concept plan attached in **Annexure A**, addresses Council's concerns regarding Old Southern Road's future design. Active transport, public transport and road network design are all matters to be assessed during a development application. Nevertheless, these matters have been incorporated into the updated layout and there is flexibility to add or adjust the active transport aspects as part of the subdivision application.

4.6 Conclusion

Conclusion

Given the very significant nature of the current proposed changes and shortcomings associated with the TIA, a referral of the new proposal (and associated studies) to TfNSW is also recommended at this point, which will also be useful to guide any revised TIA.

MTE Response: The proposal is for the rezoning of current *E3 – Productivity Support* land to *R1 – General Residential* and *C2 – Environmental Conservation* land over a portion of the subject site. While a concept subdivision plan is provided to support the application, a development application will be required to support any subdivision, which will be inclusive of a Transport Impact Assessment (TIA) which is the normal practice for any development application. If required the application can be referred to TfNSW.

5 Conclusion

The key points associated with this response letter are outlined below:

- The subject application is for a rezoning of a portion of the subject site from its existing *E3 – Productivity Support* zoning to *R1 – General Residential* and *C2 – Environmental Conservation*, which has a lower traffic-generation potential than possible employment/commercial uses under the existing zoning.
- The amended residential subdivision concept plan provided in **Annexure A** is to contextualise the residential yield.
- A development application (DA) will be subsequently be lodged that will include an assessment of the subdivision development.
- Two (2) access points to the subdivision are provided to the north to Old Southern Road and Kookaburra Way (onto Firetrail Street). There is no need for a further southern connection to Warra Warra Road to support emergency access or egress.
- The TIA provided is adequate for the scale of the rezoning proposal, which changes the zoning of the eastern portion of the development only. The TIA demonstrates that a link to Warra Warra Road is not necessary to support the subject residential yield as a result of the rezoning.
- Provision has been made for a future connection from Warra Warra Road to Old Southern Road. This connection and upgrade are not required to support the residential development associated with the subject rezoning. Nevertheless, this is a matter for the design associated with the later development application.

Please contact the undersigned on 9521 7199 should you require further information or assistance.

Yours faithfully,

McLaren Traffic Engineering



Tom Steal
Associate Traffic Engineer

BE Civil MIEAust
TfNSW Accredited Level 3 Road Safety Auditor (RSA-02-1075)

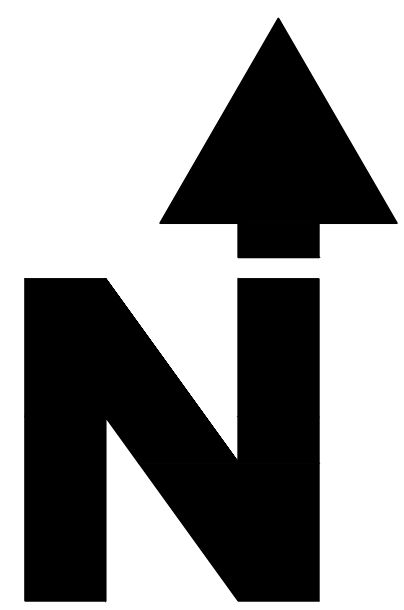


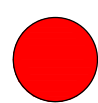
Aaron Tomlins
Principal Traffic Engineer

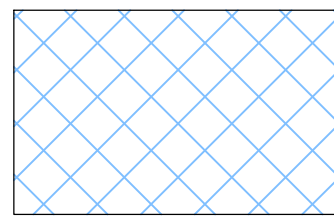
BE(Hon)(Civil Engineering)/BCom
TfNSW Accredited Level 2 Road Safety Auditor (RSA-02-1623)
MIEAust, MAITPM, MITE-ANZ



**ANNEXURE A: REZONING PLAN AND PROPSOED
SUBDIVISION CONCEPT PLAN
(4 SHEETS)**



 HOLLOW BEARING TREE

 INDICATIVE EXISTING 1%AEP FLOOD EXTENTS

REVISION	BY	DATE
WARRA WARRA ROAD SOUTH NOWRA PLANNING PROPOSAL SITE ANALYSIS TEXTI PTY LTD LOT 2 DP 1126288 & LOT 224 DP 755952		
RATIO: 1:500		
DATE: 21/07/2026		
REF: TEXTI		

DIMENSIONS AND AREAS ARE SUBJECT TO SURVEY



This plan was prepared to accompany a planning application only and is not for construction.

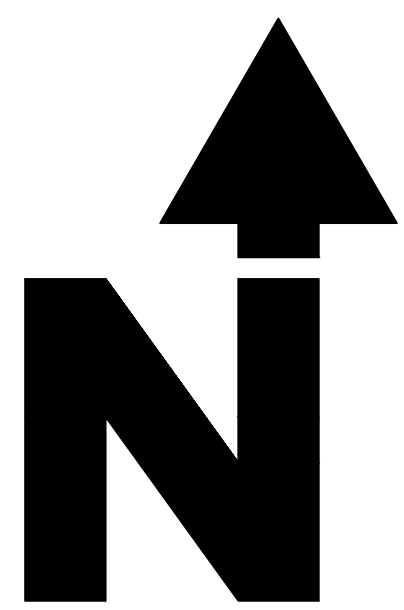
The information on this plan is not suitable for any other purpose.

The property dimensions, contours and other physical features have been compiled from existing information and have not been verified by field survey. Dimensions & areas shown on this plan are subject to survey, further detailed design and also to the requirements of the relevant Consent Authority and any other authority which may have requirements under any relevant legislation.

In particular, no reliance should be placed on the information on this plan for detailed design purposes or for any financial dealings involving the land.

Jervis Bay Town Planning therefore disclaims any liability for any loss or damage whatsoever incurred, arising from any party using this plan for any purpose other than as a document prepared for the sole purpose of accompanying a planning application made to the Planning Authority which may be subject to alteration for reasons beyond the control of Jervis Bay Town Planning.

This note is an integral part of this plan.



EXISTING
SITE
CONTOURS



DIMENSIONS AND AREAS ARE SUBJECT TO SURVEY

REVISION	BY	DATE
WARRA WARRA ROAD SOUTH NOWRA PLANNING PROPOSAL EXISTING CONTOURS TEXT PTY LTD LOT 2 DP 1126288 & LOT 224 DP 755952		
RATIO: 1:500		
DATE: 21/07/2026		
REF: TEXT		



This plan was prepared to accompany a planning application only and is not for construction.

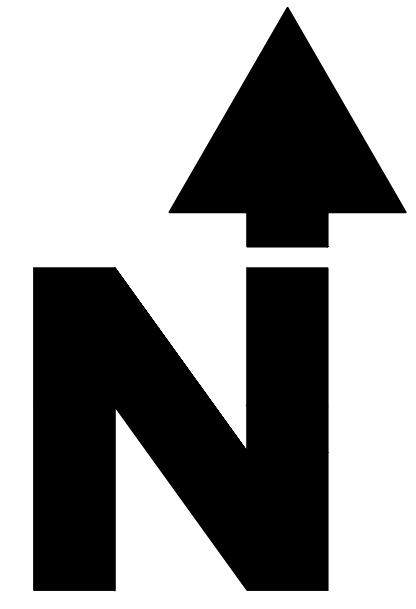
The information on this plan is not suitable for any other purpose.

The property dimensions, contours and other physical features have been compiled from existing information and have not been verified by field survey. Dimensions & areas shown on this plan are subject to survey, further detailed design and also to the requirements of the relevant Consent Authority and any other authority which may have requirements under any relevant legislation.

In particular, no reliance should be placed on the information on this plan for detailed design purposes or for any financial dealings involving the land.

Jervis Bay Town Planning therefore disclaims any liability for any loss or damage whatsoever incurred, arising from any party using this plan for any purpose other than as a document prepared for the sole purpose of accompanying a planning application made to the Planning Authority which may be subject to alteration for reasons beyond the control of Jervis Bay Town Planning.

This note is an integral part of this plan.



CONCEPT RESIDENTIAL LOT LAYOUT

PRINCES HIGHWAY

EXISTING
BUSINESS ZONE
6.7HA

PROPOSED
CONSERVATION
ZONE (C2)
9.3HA

OSD

ROAD 16 WIDE

ROAD 16 WIDE

ROAD 16 WIDE

ROAD 28.4 WIDE

ROAD 16 WIDE

ROAD 16 WIDE

ROAD 25 WIDE

ROAD 23.5 WIDE

PROPOSED
CONSERVATION
ZONE

FUTURE
CONNECTION
TO WARRA WARRA
ROAD

WARRA WARRA ROAD

RU2
(VACANT LAND)
LOT 3 DP1126288

RU2
(VACANT LAND)
LOT 2 DP1108043

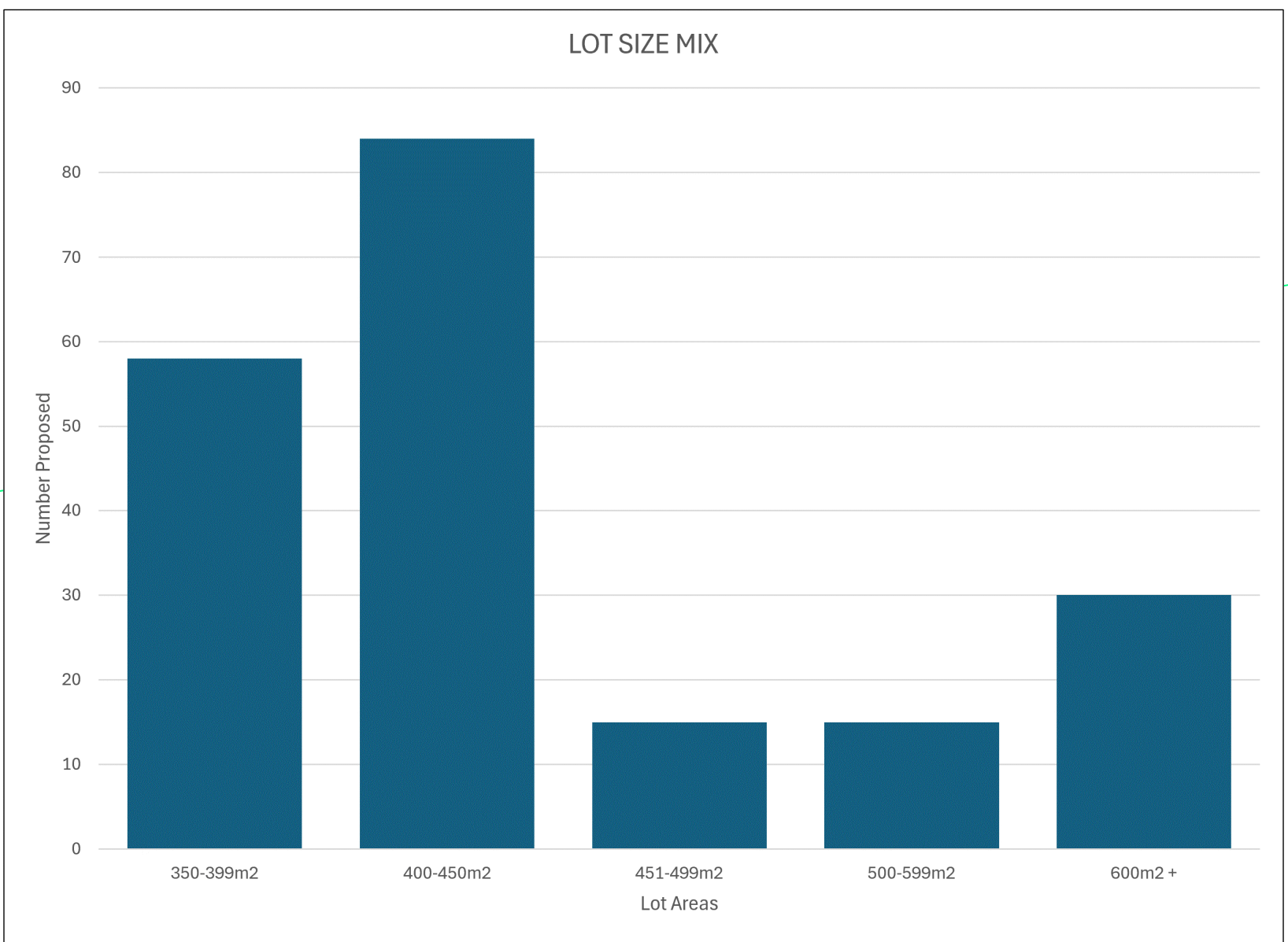
RU2
(VACANT LAND)
LOT 3 DP1108043

RU2
(VACANT LAND)
LOT 4 DP1108043

C2 ENVIRONMENT
CONSERVATION
ZONE
(NPWS)

LOT YIELD

LOT SIZE AREA	NO. OF LOTS
350-399M2	58
400M2 - 450M2	84
451M2 - 499M2	15
500M2 - 599M2	15
600M2 +	30
TOTAL	202 LOTS
LOTS PER HA	12.9



RU2
RURAL LANDSCAPE
ZONE
(RIFLE RANGE)

DENOTES ASSET PROTECTION ZONE

DIMENSIONS AND AREAS ARE SUBJECT TO SURVEY

REVISION	BY	DATE
WARRA WARRA ROAD SOUTH NOWRA PLANNING PROPOSAL CONCEPT SKETCH 1 TEXI PTY LTD LOT 2 DP 1126288 & LOT 224 DP 755952		
RATIO: 1:500 DATE: 21/07/2026 REF: TEXI		



This plan was prepared to accompany a planning application only and is not for construction.

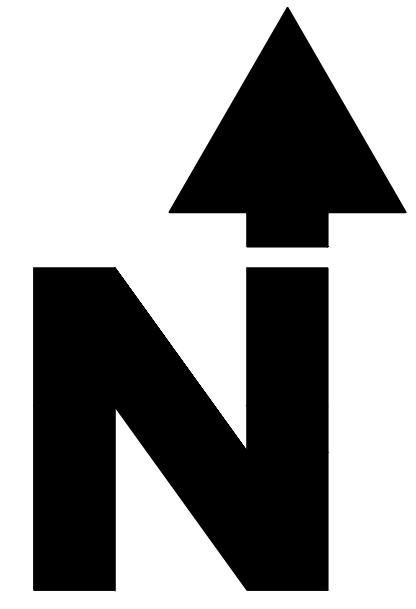
The information on this plan is not suitable for any other purpose.

The property dimensions, contours and other physical features have been compiled from existing information and have not been verified by field survey. Dimensions & areas shown on this plan are subject to survey, further detailed design and also to the requirements of the relevant Consent Authority and any other authority which may have requirements under any relevant legislation.

In particular, no reliance should be placed on the information on this plan for detailed design purposes or for any financial dealings involving the land.

Jervis Bay Town Planning therefore disclaims any liability for any loss or damage whatsoever incurred, arising from any party using this plan for any purpose other than as a document prepared for the sole purpose of accompanying a planning application made to the Planning Authority which may be subject to alteration for reasons beyond the control of Jervis Bay Town Planning.

This note is an integral part of this plan.

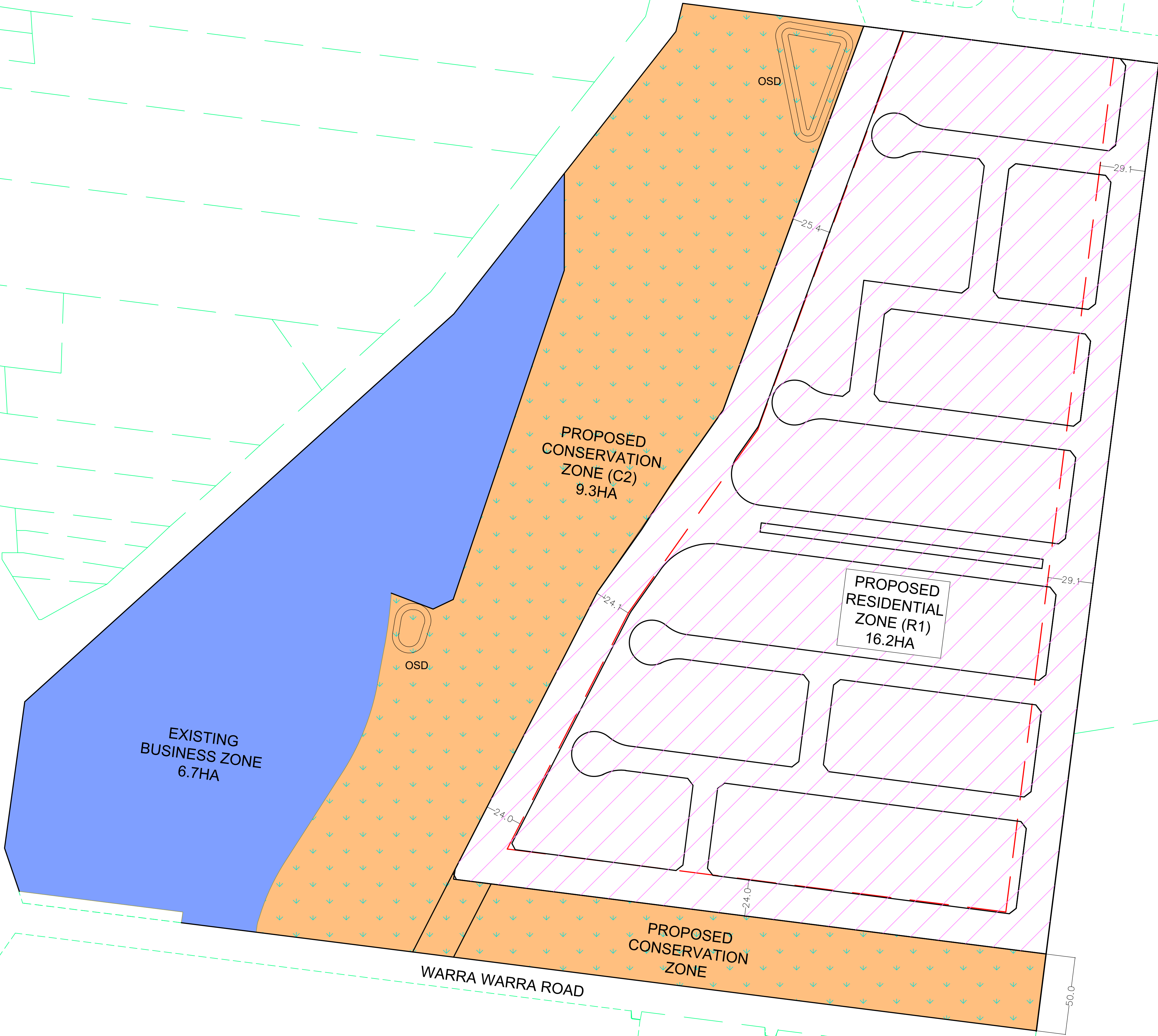


CONCEPT
RESIDENTIAL
ROAD
LAYOUT

DENOTES ASSET PROTECTION ZONE

PRINCES HIGHWAY

PRINCES HIGHWAY



C2 ENVIRONMENT
CONSERVATION
ZONE
(NPWS)

RU2
RURAL LANDSCAPE
ZONE
(RIFLE RANGE)

RU2
(VACANT LAND)
LOT 3 DP1126288

RU2
(VACANT LAND)
LOT 2 DP1108043

RU2
(VACANT LAND)
LOT 3 DP1108043

RU2
(VACANT LAND)
LOT 4 DP1108043

DIMENSIONS AND AREAS ARE SUBJECT TO SURVEY

REVISION	BY	DATE
WARRA WARRA ROAD SOUTH NOWRA PLANNING PROPOSAL PROSED LAND USES TEXTI PTY LTD LOT 2 DP 1126288 & LOT 224 DP 755952	RATIO: 1:500 DATE: 21/07/2026 REF: TEXTI	



This plan was prepared to accompany a planning application only and is not for construction.

The information on this plan is not suitable for any other purpose.

The property dimensions, contours and other physical features have been compiled from existing information and have not been verified by field survey. Dimensions & areas shown on this plan are subject to survey, further detailed design and also to the requirements of the relevant Consent Authority and any other authority which may have requirements under any relevant legislation.

In particular, no reliance should be placed on the information on this plan for detailed design purposes or for any financial dealings involving the land.

Jervis Bay Town Planning therefore disclaims any liability for any loss or damage whatsoever incurred, arising from any party using this plan for any purpose other than as a document prepared for the sole purpose of accompanying a planning application made to the Planning Authority which may be subject to alteration for reasons beyond the control of Jervis Bay Town Planning.

This note is an integral part of this plan.