



22 February 2021

Southern Regions Team
Department of Planning, Industry and Environment
L2 - 84 Crown Street
Wollongong NSW 2520

RE: Draft Illawarra-Shoalhaven Region Plan 2041

Thank you for the opportunity to comment on the Draft Illawarra-Shoalhaven Region Plan 2041 (the Draft Plan). Sutherland Shire shares key infrastructure with the communities of the Illawarra and the Shoalhaven which means that land use and investment decisions will have direct flow on effects for our community and businesses. The Princes Highway and South Coast Railway both serve Sutherland Shire, and are under considerable pressure as the demands of freight and passenger traffic grow. The Draft Plan must demonstrate how capacity for the projected faster growth of the Illawarra-Shoalhaven can be provided without diminishing the quality of service provided to the residents of the Sutherland Shire.

Despite the growth the Western and Central Cities within Greater Sydney, there is no expectation that freight and passenger traffic will diminish between the Eastern City and the Illawarra-Shoalhaven. In fact it may very well increase. This will be driven by growing residential populations and economies in both regions, but also by the role of Port Kembla in relieving Port Botany as it approaches full capacity. The Draft Plan appears to rely on telecommuting and improved links to the Western City via the proposed M9 Outer Sydney Orbital Motorway and Maldon-Dombarton rail line to accommodate growth. However, these factors alone will not be sufficient to combat congestion on the existing intercity roads and railways which serve the Eastern and Central cities. The increased rate of growth projected by the Draft Plan must be balanced by enhanced commitments to create the necessary infrastructure capacity.

Sutherland Shire Council is particularly concerned that the main growth precinct in the Wollongong and Shellharbour have better access to freeway connections to Greater Sydney than they do rail connections. In addition, the current service from the Illawarra through the Royal National Park is comparatively slow, making it quicker for residents to drive to Sutherland Shire to take trains to employment destinations. This will add to what is already an insatiable demand for commuter parking in Sutherland Shire that is eroding the amenity and liveability of the local centres along the railway line.

Further congestion will undermine the productivity of Sutherland Shire businesses, making it harder to achieve the employment growth targets set for Miranda and Sutherland centres by the South District Plan. Sutherland Shire residents rely on the Eastern City for employment and are largely dependent on the road and rail network to access jobs. Further congestion of both road and rail networks will impact the quality of life of residents and be at odds with the Directions of both the Greater Sydney Region Plan - A Metropolis of Three Cities and the South District Plan of creating a well-connected city and aligning growth with infrastructure. The connections may exist, but they must be efficient and have adequate capacity if the State's strategic objectives are to be realised.

The residents of both Sutherland Shire and the Illawarra rely on Heathcote Road to access employment at ANSTO, and in Liverpool and Bankstown. Heathcote Road also connects the

Illawarra-Shoalhaven to Sydney's Central City via the A6 arterial road. This route will become even more important in line with the growth of Parramatta at the geographic centre of Sydney as envisaged by the Greater Sydney Region Plan. Yet, despite Heathcote Road being a critical link with a history of fatalities, no commitment has been made to upgrade it to support its current and future role. Given the importance of this link to the Illawarra, the Draft Plan should highlight the importance of Heathcote Road and support its upgrade to a dual carriageway so that it can safely accommodate future traffic volumes.

Similarly, realising the M6 needs to be made a priority in order to accommodate growth in the Illawarra/Shoalhaven Region. Without a commitment to expedite the M6, growth in the Illawarra/Shoalhaven region will simply result in unacceptable levels of congestion in Sutherland Shire, eroding amenity and liveability for local communities, and creating further barriers to economic growth. Ultimately, the M6 extension must connect Kogarah to Waterfall. The Region Plan must make a commitment to realise this critical section of the network in order to align road capacity with the projected growth of the region. The realisation of the M6 corridor across Sutherland Shire must also recognise the value of the current open space network in the corridor to local communities and utilise tunnelling or cut and cover construction methods to maximise the retention of open space.

The Draft Plan also foreshadows the release of the State's Faster Rail Strategy in planning for faster railway connections between Sydney, Wollongong and Nowra. While this is an admirable objective, trains on the intercity South Coast line share tracks and platforms with T4 suburban trains that stop much more frequently. The rail network cannot support both faster intercity services and more capacity on suburban services without major track duplications or relief lines within Greater Sydney. Faster Rail Services to the Illawarra-Shoalhaven are not acceptable if they reduce the quality of services and capacity provided to the commuters of the Sutherland Shire and other residents of southern Sydney.

To address these concerns, the Draft Plan (or the Draft Illawarra-Shoalhaven Region Transport Plan) should project future traffic demand, identify the resulting capacity gaps and suggest projects (and timing) which can meet the capacity needs and service expectations of the region. The M6 corridor between Loftus and Sydney Airport is an obvious alignment to consider for both new road and faster mass transit capacity through southern Sydney. Sutherland Shire Council notes that Wollongong City Council and other stakeholders have identified the SWIRL project as a key priority for improving connectivity and managing congestion on existing passenger rail services. These changes are needed to create the connectivity and alignment between Growth and Infrastructure required by the Greater Sydney Region Plan.

Please note this this submission has been endorsed by Council at its meeting of 15 February 2021 and supersedes the earlier preliminary submission. Should you require any further information please contact [REDACTED]

Yours sincerely,

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