

Friday, 29 January 2021

Corridor Investigation Office  
PO BOX K659  
Haymarket NSW 1240

Via email: [corridors@transport.nsw.gov.au](mailto:corridors@transport.nsw.gov.au)

## **UDIA NSW Submission on the options for the Outer Sydney Orbital at Appin**

Dear Corridor Investigation Office,

The Urban Development Institute of Australia NSW (UDIA) is the leading industry body representing the interests of the urban development sector. UDIA represents over 500 member companies that are directly involved in across the industry including developers, consultants (engineering, planning, legal, environmental, design) and local government, for the goal of Liveable, Affordable & Connected Smart Cities.

UDIA has a keen interest in the proposed Outer Sydney Orbital project (the OSO) which we regard as a major city shaping initiative that will provide improved road and rail freight access in Greater Western Sydney (GWS) and beyond the metropolitan region.

UDIA supports improving regional road links between GWS and the Illawarra Shoalhaven, which forms part of the UDIA's regional strategy titled "*Unblocking the Illawarra-Shoalhaven Strategy 2019-20*" (Refer to Attachment No.1). However, we contend that Transport for NSW (TfNSW) must assess all potential road options, assess all key issues impacting current and future markets, and share that analysis with stakeholders before a final option is recommended.

This approach will provide greater support for the final outcome and help key stakeholders including the community, landholders and local councils determine their response and longer-term aspirations for the OSO at Appin.

In order to remove the uncertainty that is already impacting on the region, we recommend that TfNSW consider the following issues as a matter of urgency before a final option is recommended to link the Illawarra Shoalhaven to the OSO at Douglas Park, which is being delivered in Stage 1.

### **1. Full assessment of the impacts on the Greater Macarthur Growth Area**

The Greater Macarthur Growth Area (GMGA) is a key growth area in GWS, which has a predicted population of 70,000 people. The GMGA is essential to achieve the Greater Sydney Commission's strategic vision for a Metropolis of Three Cities as part of the Western City District Plan.

UDIA supports improvements to road and transport access to link the GMGA with GWS. We also support a proposed outcome that results in the least impact to the Appin Township.

UDIA is concerned that each proposed OSO2 option will create a physical barrier between the Appin Township and West Appin precincts. This presents a poor planning and place-based outcome, not only due to the loss of usable urban land within the GMGA, but also the detrimental effect of splitting communities and the loss of local access to key destinations (shops and recreational areas).

The OSO2 Options Report fails to address this issue, which is compounded due to limited information presented on how each OSO2 option will link with the existing and future local road network. This issue must be addressed to provide the basis to properly assess the impacts from the OSO2 on the GMGA including impacts on identified koala habitat areas.

UDIA notes that TfNSW is working on road access options at Ulladulla and Blackheath which are being designed to avoid physical barriers and restrictions to local access. This approach should also be applied with the GMGA, which will become a key employment and residential area in GWS.

UDIA contends that TfNSW must properly assess all potential impacts including the impacts on the GMGA, the local road network and koala habitat areas before a final route selection is nominated.

**Recommendation 1. TfNSW to assess all potential impacts with each OSO2 option with a view to lessen impacts on the GMGA, the local road network and koala habitat areas.**

## **2. Full assessment of Picton Road as a primary road link between Greater Western Sydney and the Illawarra Shoalhaven**

UDIA seeks a response from TfNSW as to why Picton Road/Hume Highway is not the recommended route to link the Illawarra Shoalhaven with the OSO at Douglas Park.

Picton Road is a main sub arterial road that already provides a direct east-west link from GWS to the Illawarra Shoalhaven, via the Wilton Growth Area. Due to its location, it allows good access from GWS to Port Kembla, the Wollongong CBD, and West Lake Illawarra, which is a regional significantly growth area that will contain up to 20,000 dwellings.

Compared to Appin Road (B69), Picton Road has a shorter road corridor length of 35.5 kms from Douglas Park to Mount Ousley, as compared to Appin Road, which is 42.4 kms; a point made in the OSO2 Options Report.

Picton Road also does not require land acquisition in a growth area and there is limited potential for any physical barriers within the Wilton Growth Area, which is currently being developed based on an upgraded Picton Road corridor.

The upgrade of Picton Road is identified in the *Draft Illawarra Shoalhaven Regional Transport Plan 2020* (the Draft IS RTP) and has strong stakeholder support from Regional Development Australia, elected State and local representatives and the City of Wollongong Council.

UDIA contends that the OSO2 Options Report does not provide enough justification that concludes whether Picton Road is or is not the best option to improve regional road access between GWS and the Illawarra Shoalhaven.

**Recommendation 2. TfNSW should provide its analysis of Picton Road as the long-term regional link between the Illawarra Shoalhaven and GWS and why it was ruled out.**

### 3. Alignment with the Draft Illawarra Shoalhaven Regional Transport Plan

Based on our review of the Draft ISRTP, it raises concern with the process that TfNSW is going through to determine the best route option to link between GWS and the Illawarra Shoalhaven. Refer to Page 31 of the Draft RTP:

*The Outer Sydney Orbital Stage 2 (OSO2) investigation is considering the preservation of new corridors connecting the Illawarra-Shoalhaven with Western Sydney where it would connect with the Outer Sydney Orbital Stage 1. This may include new links to connect the region through the Greater Macarthur and Wilton Growth Areas, as well as a potential new crossing of the Illawarra Escarpment.*

This presents a position that TfNSW still has not decided on whether a preferred long term road link will occur via the GMGA, the Wilton Growth Area or at another location along the Illawarra Escarpment. This presents a miscommunication between the Draft ISRTP and OSO2 Options Report, as there has been no release of information regarding Picton Road or any other cross-regional road options.

Under the Draft ISRTP, TfNSW is seeking to upgrade Picton Road within 10 years (Initiative 12) but only provide reliability and safety improvements to Appin Road (Initiative 22), which essentially is a low-scale upgrade to an existing road. This also suggests that TfNSW favours Picton Road as the prime regional road route from the Illawarra Shoalhaven to GWS that will receive a major upgrade.

**Recommendation 3. TfNSW to achieve greater alignment with the Draft ISRTP to reduce potential miscommunication regarding future road links with Greater Western Sydney.**

### 4. Long term planning of the key regions and the provision of timely infrastructure

UDIA supports a more collaborative process that allows for timely and meaningful input from stakeholders informing Government on preferred outcomes.

This approach will provide the most efficient regional road network for the long term that considers the impact on existing and future growth areas, provides for the most safe and reliable access route from GWS to the Illawarra Shoalhaven and is an option which has a high level of stakeholder support.

**Recommendation 4. TfNSW to work closely with key stakeholders to provide a preferred road link with high stakeholder support and an option that supports in the key growth areas.**

### 5. Conclusion

The ambitions by Transport for NSW to secure a preferred link from Greater Western Sydney to the Illawarra Shoalhaven are supported to improve regional access and support the key growth areas including the GMGA, the Wilton Growth Area and the Illawarra Shoalhaven.

However, UDIA is concerned that the information contained in the OSO2 Options Report is far from comprehensive, failing to explain why alternative options that may result in a reduced impact to existing and future growth areas but lead to improved regional road access have been ruled out.

UDIA supports a more collaborative assessment process that properly reviews the following issues:

- Impacts to future planning precincts and growth areas;
- Impacts to areas of high environmental significance;
- Impacts on existing local road networks;
- Alternative route options to link the GWS to the Illawarra Shoalhaven;

This approach will lead to a higher level of stakeholder support for a chosen option.

Alignment with the Illawarra Shoalhaven Draft Regional Transport Plan and Corridor Options report is critical to provide a consistent and clear message on what road upgrade option is also preferred.

Given the uncertainty and the lack of information on why options such as Picton Road have been ruled out, UDIA would like to meet with TfNSW to discuss the issues we have raised, as a matter of urgency. This will help ensure developer confidence and delivery towards achieving the planning and transport vision for the Illawarra Shoalhaven and Greater Western Sydney.

Please contact Mr Kit Hale on 02 9262 1214 or khale@udiansw.com.au to arrange a meeting.

Yours sincerely,

A handwritten signature in black ink that reads "Steve Mann". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Steve Mann  
**Chief Executive**  
**UDIA NSW**

Attachment No.1 – Unlocking the Illawarra-Shoalhaven – UDIA Illawarra-Shoalhaven Strategy 2019-20