



Draft Illawarra-Shoalhaven Regional Transport Plan

Submission from the Illawarra Business Chamber

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Introduction

The Illawarra-Shoalhaven is one of the state's fastest-growing regions with a strong and diversified economy; home to more than 26,565 businesses employing 147,000 residents (ABS, February 2020).

As the third largest economy in NSW and home to the port of Port Kembla, the state's next container terminal (and future hydrogen energy hub), the Illawarra-Shoalhaven holds the solutions to many of the challenges facing Greater Sydney and contributes \$23.9 billion to the state economy (2019).

The region's heavily diversified industrial base includes a world-class University, advanced manufacturing clustered around Wollongong and Nowra and major tourism assets spread across the coastline and inland. Strong employing sectors in construction and health, aged and disability care provide underlying jobs growth in the region. Administration and knowledge services are growing thanks in large part due to the availability of qualified workforce within the region and the development of new commercial office space.

On behalf of its members across every sector of the economy, the Illawarra Business Chamber supports a bold ambition for the future transport planning for the region and has worked over several years to advocate successfully for improvements based on rigorous evidence developed at its own cost as part of its Illawarra First business leadership program.

The chamber welcomes the opportunity to provide input to the Draft Illawarra-Shoalhaven Regional Transport Plan.

Infrastructure and regional resilience

There is no doubt that the recent pandemic has altered movement patterns on the region's transport network; notwithstanding the laudable efforts by governments to minimise its impact on the economy. Whether this disruption will lead to long-term changes to infrastructure demand remains to be seen, and changes to the nature of work and commuting will be the subject of forthcoming Illawarra First directed research. All indications suggest that the economy will revert and continue to grow, with the imminent rollout of a vaccine, and businesses across most sectors largely intact.

Our region's complete economic recovery will not be possible without supporting infrastructure connectivity to match its growth; particularly road, rail and telecommunications, and its future growth and prosperity relies on this connectivity being steadily improved in line with demonstrated need.

Evidence base

The Illawarra Business Chamber is leading the region's transport advocacy through its Illawarra First program, a business leadership group in whose name we commission independent research to establish a rigorous evidence base and drive direct advocacy.

Transport connectivity has been identified as a matter of principal importance to our members, and we are committed to ensuring that transport infrastructure improvements are delivered in order to allow the continued growth of both our economy and our population.

Through Illawarra First, the Illawarra Business Chamber has taken an economic analysis approach to problems that sees the best option for the economy as also being the most cost effective and therefore best value for taxpayers. Previous Illawarra First research presents clear and focused recommendations for future road and rail developments.

Our Illawarra First transport research reports to date are as follows and can be downloaded via the following links:

- [2017 – Upgrading Rail Connectivity between the Illawarra and Sydney \(University of Wollongong, SMART Infrastructure Facility\)](#)
- [2018 – Upgrading Road Connectivity between the Illawarra and Greater Sydney \(Veitch Lister Consulting\), joint project with the NRMA](#)
- [2020 – South West Illawarra Rail Link \(University of Wollongong, SMART Infrastructure Facility\), joint project with Wollongong City Council and Wollondilly Shire Council](#)

State of the region’s infrastructure network

As a satellite region to Greater Sydney, the Illawarra-Shoalhaven supports the economic performance of the state’s capital and contributes significantly to the NSW Gross State Product. Wollongong, as the regional capital of the Illawarra, and Nowra, as the regional capital of the Shoalhaven, provide a range of services to support their regions, and are home to key assets that support the economies of surrounding areas and other parts of NSW.

Port Kembla is a growth port that is already the largest vehicle importation hub in Australia, and will eventually function as the state’s second container terminal. It already services large parts of Southern NSW as a grain terminal and import facility for an array of construction materials and bulk goods.

Rationale for infrastructure improvements

Improvements to the transport network from the Illawarra-Shoalhaven to Greater Sydney and regions to the south and inland are vital to support the following:

1. Population growth – The Regional Transport Plan notes that population growth within the region between now and 2041 will be significant with an additional 100,000 residents expected, predominantly in the Wollongong and Shellharbour LGAs.

It is important to note the expected population growth in neighbouring regions; particularly the Wollondilly, which will see 46,451 additional residents by 2041¹. This will place significant pressure on Illawarra-Shoalhaven transport network due an exchange of populations seeking employment, educational and recreational opportunities.

Anecdotally, during the COVID-19 pandemic the Illawarra-Shoalhaven has become a significant destination for both tourism visitation and wholesale relocation, meaning both the base and temporary populations have grown and causing additional demand has been experienced on transport networks and other public assets.

2. Travelling to work – In 2016, 26,000 workers commuted from the Illawarra-Shoalhaven to Greater Sydney on a daily basis, and of these 12,000 travelled to headed to Western Sydney and 97 percent of these trips were made by car. By 2041, it can be expected that this commuting population will increase to 46,000 per day unless significant job growth occurs within the Illawarra-Shoalhaven².
3. Growth of the region’s freight task – Population and economic growth will drive significant local rail and road freight traffic within the Illawarra-Shoalhaven, together with the

¹ Economy ID population forecast – Wollondilly LGA (<https://forecast.id.com.au/wollondilly>)

² Report: *South West Illawarra Rail Link*, University of Wollongong SMART Infrastructure Facility, 2020

developments contained under the Western Sydney City Deal, particularly the Nancy Bird Walton Airport and the aerotropolis.

According to modelling by Transport for NSW³, annual rail demand will increase in the Illawarra-Shoalhaven from 7,202 to 19,029 train paths between 2036 and 2056, due to growth in coal, steel, construction-related and imported vehicle freight. Over the same period, freight-related road demand will increase from 5 million trips per annum in 2036 to 7.7 million in 2056, due to the growth in coal, manufacturing goods imported vehicles and shipping containers. The container terminal at Port Kembla planned for development around 2041 by NSW Ports is expected to account for a 49 percent increase in rail demand and a 21 percent increase in freight demand by 2056⁴.

4. Tourism visitation – As one of the state’s premier tourism destinations, the Illawarra-Shoalhaven experiences a high-degree of visitation from both domestic and international tourists who primarily access the region via road – and to a much lesser degree – rail.

Tourism in the Illawarra provides employment for more than 10,000 workers and generates \$1.84 billion in output. This amounts to \$184,000 per worker in output and places it as one of the more high-yielding industries in the Illawarra⁵. The industry contributes more than four per cent of the Illawarra’s total economic output.

While the pandemic has all but eradicated international visitation, anecdotally domestic visitors have partially ‘filled the gap’ since lockdowns were lifted. Accommodation providers have been heavily booked in parts of the region in the lead-up to and throughout summer, and in some areas, midweek visitation has been stronger than previously experienced which is a trend many hope to continue.

Tourism visitation contributes to pressures on the region’s road network. Greater Sydney (45.3 per cent) has been the largest source of visitors to the region, and this visitation has traditionally been concentrated around weekends and public holidays. Certain roads in the region are impacted by this trend, which has implications for local residents. Traffic along Grand Pacific Drive and Lawrence Hargrave Drive can be significant on weekends, and Lawrence Hargrave Drive can struggle to handle the extra volumes of traffic. Local traffic congestion at the Seacliff Bridge (Coalcliff and Clifton) and Thirroul is also a concern.

5. Community safety – Aside from the human cost of road trauma, there is also an economic one. The Illawarra First/NRMA Road Study (2018) estimated the total cost of vehicle accidents between 2011 and 2015 (inclusive) in the Illawarra at nearly \$2 billion, an average of around \$370 million per year⁶.

Based on data obtained from Roads and Maritime Services, this study found the most dangerous roads in the Illawarra based on accidents between 2012 and 2016 as follows:

1. Macquarie Pass – 135 accidents
2. Mount Ousley – 92 accidents
3. Picton Road – 90 accidents
4. Appin Road – 52 accidents
5. Bulli Pass – 38 accidents
6. Princes Highway, north of Bulli Tops – 29 accidents

³ *Future Transport Strategy 2056*, Transport for NSW (2018)

⁴ SMART (2020) *ibid*

⁵ Report: *Upgrading Road Connectivity Between the Illawarra and Greater Sydney*, Veitch Lister Consulting - Illawarra First/NRMA, (2018)

⁶ Veitch Lister Consulting (2018) *ibid*

Assessment of current and planned infrastructure improvements

Road network

Recent announcements by the NSW Government provided welcome progress on the planning for both of the two key road priorities advocated for by the Illawarra Business Chamber throughout 2020; being the Picton Road motorway upgrade and the Mount Ousley Interchange project.

1. Picton Road - Picton Road is a 37km road linking the M1 Princes Motorway at Mount Ousley to the Hume Highway near Picton. It is the region's primary freight corridor connecting the Illawarra-Shoalhaven (including Port Kembla) to Western Sydney, carrying over 21,000 vehicles daily of which 25 percent are heavy vehicles. Yet only a small proportion of the 100 km/h road is divided, and an even smaller proportion is double lane each way.

According to the Illawarra First/NRMA Road Study (2018), Picton Road will reach peak capacity in 2022 and daily capacity in 2025 and so it recommended that it be upgraded to motorway standard by 2025, which would yield economic benefits of around \$33.5 million per year.

Following a [campaign led by the Illawarra Business Chamber](#) and supported by more than 30 local businesses and stakeholders that rely on Picton Road for commercial or other reasons, on 9 November the Minister for Transport announced funding of \$44 million to progress planning of the necessary upgrade, including of the outdated interchanges at each end of the road.

It is recommended that Picton Road be upgraded to motorway standard by 2025.

2. Mount Ousley Road – The second key road priority is the Mount Ousley Interchange project, which had stalled at concept design stage. The recommendation in the Illawarra First/NRMA Road Report (2018) was that Mt Ousley Road be upgraded via both interchange and widening projects, given it carries 53,000 vehicles daily and will reach capacity by 2024 (peak) or 2026 (daily).

Following advocacy by the Illawarra Business Chamber in concert with NSW Ports and the University of Wollongong, on 21 November the NSW government committed \$21 million to progress detailed design, utility service investigations, further environmental assessment and property acquisition.

It is recommended that the Mount Ousley Interchange be delivered by 2025, and that a project be initiated to extend the third southbound lane commencing halfway down (approx. 2.5 kms).

Other key road developments in delivery supported by the Illawarra Business Chamber include:

1. Albion Park Rail Bypass, which is reportedly ahead of schedule.
2. Nowra Bridge Princes Highway upgrade.
3. Berry to Bomaderry Princes Highway upgrade.
4. Princes Highway upgrade to the Victorian border. It is recommended that the NSW Government work closely with Local Chambers of Commerce on the alignment of the stages of the upgrade, particularly on the Milton-Ulladulla Bypass, the upgrade between Jarvis Bay Road and Sussex Inlet Road and the Moruya Bypass.

Finally, the Illawarra Business Chamber supports the proposed alignment and future construction of the Tripoli Way (Albion Park Bypass) project. In December 2020 Shellharbour City Council received \$4.2 million from the NSW Government to develop the project, however the chamber understands further funding will be needed and so will continue its advocacy in partnership with Council.

Rail network

Rail connectivity enhancements have been more elusive to the Illawarra-Shoalhaven region, which remains entirely reliant on the antiquated South Coast/Illawarra rail line which is subject to significant topographical challenges and presents as the region's sole rail linkage to Greater Sydney.

The transport challenge for commuters is established in the Draft Plan, which acknowledges that 83 percent of all trips and 88 percent of commuter trips in the region are made by private vehicle, and that demand for travel in the region is expected to grow by 25 percent by 2041 (p. 18).

The Draft Plan acknowledges the growing importance of the connection to Western Sydney and proposes a feasibility study to examine improved bus services (p. 28).

For freight, the Draft Plan notes that, of the 14 million tonnes of freight moved through the Illawarra-Shoalhaven region, 70 percent travels on the South Coast Line, and 30 percent on the Moss-Vale Unanderra Line (p. 51).

The critical freight constraints of the region are also acknowledged:

"Beyond 2041, it is anticipated that Port Botany will reach capacity and the overflow of container freight will be absorbed by Port Kembla. By 2056, approximately 10 million tonnes of container freight is forecasted to be transported out of the region from Port Kembla by rail.

The transport of freight via the shared rail network is constrained by the needs of passenger transport, particularly during morning and afternoon passenger peaks. Transport freight services are often held for up to 11 hours as passenger services are given priority." (p. 53)

In response to this, the Draft Plan reiterates the proposal contained within the government's 2018 NSW Freight and Ports Plan, listing "...the completion of Maldon to Dombarton Line as an initiative for investigation in the medium-term (10-20 years)," which does not reflect the evidence, or the potential solutions, advanced by Illawarra Business Chamber (through Illawarra First) since 2017 (See: 'Additional required infrastructure improvements' 'Rail network', p. 7).

It is strongly recommended that this evidence base, together with the South West Illawarra Rail Link (SWIRL) concept proposed, are reflected in the Final Report with a timeframe for planning of the project to commence as soon as possible, and completion by 2041.

Otherwise, the Draft Plan describes minor and/or incremental improvements to the Illawarra-Shoalhaven's rail network, which are supported and include:

1. The rollout of the 'More Trains, More Services' program to the T4 Illawarra and South Coast Lines outlined in the Draft Plan (p. 27) which will increase services for passengers will be increased to 15-minute intervals at peak times, and 30-minute off-peak.
2. The planned crossing loop at Toolijooa to facilitate greater rail service between Berry and Gerringong.
3. The introduction of the New Intercity Fleet from 2023 on the Kiama to Bomaderry service (p. 28).

Finally, the Draft Plan notes that: "Transport for NSW is currently developing a Fast Rail Network Strategy for NSW [...], which will present a blueprint for how fast rail could be delivered and includes the corridor between Sydney and Bomaderry."

The Illawarra Business Chamber looks forward to further detail on the Strategy and makes further comment at 'Future infrastructure initiatives', p. 11.

Additional required infrastructure improvements

Road network

Through its directed research program, specifically the Illawarra First/NRMA Road Report (2018), the Illawarra Business Chamber has identified the M6 Motorway (previously the F6 Extension) as the transformative road development for the Illawarra-Shoalhaven's connectivity to Greater Sydney.

Ultimately, the project is designed as a 30 km freeway connection between the Illawarra and Sydney in four stages as follows:

- **Stage One** – New M5 in Arncliffe to President Ave Kogarah – 4 kms
- **Stage Two** – President Ave to Captain Cook Bridge – 5 kms
- **Stage Three** – Captain Cook Bridge to Acacia Road/Loftus Ave, Loftus – 8 kms
- **Stage Four** – Loftus to Waterfall – 13 kms.

As the project terminates at Waterfall, to the immediate north of the Illawarra-Shoalhaven region, it is presumably considered out of scope for the purposes of the Draft Plan.

However for those people travelling between Wollongong and the Sydney CBD, the full benefit of travel time savings will be significant once Stages 2 and 3 are completed. In the morning peak period, travel time savings are estimated to be 27 minutes, and the total economic benefits for the completion of Stages 1, 2 and 3 of the M6 are \$677 million per year in 2031⁷.

The NSW Government has approved Stage One in December 2019, with a contract due to be awarded in December 2020. Construction is scheduled to begin by early 2022 and the road to open to motorists by the end of 2025.

The Illawarra Business Chamber will continue its advocacy to support a decision to deliver Stages Two and Three of the M6 Motorway.

It is recommended that the first three stages of the M6 Motorway be included in the Draft Plan, given their benefits to the Illawarra-Shoalhaven region, and scheduled for delivery by 2040.

Rail network

The problem

The growing rail connectivity constraints of the Illawarra-Shoalhaven are well-documented outside the Draft Plan, and are of great concern to the business community, local governments and the wider population of the region.

A 2014 report by PwC for the Illawarra Business Chamber found that:

"Accessing jobs and trading opportunities in Sydney already costs Illawarra residents and businesses around half a billion dollars a year. Without action, the time and out of pocket costs are expected to increase to at least \$690 million per annum by 2031."

⁷ Veitch Lister Consulting (2018), *ibid*

Passengers, who already face a 90-minute rail commute from the Illawarra to Eastern Sydney, are expected to grow in number from 26,000⁸ in 2016 to 46,000 by 2041⁹. Of these, 12,000 head to Western Sydney for work (97 percent travel by car), and a further 6,000 come from Western Sydney to work in the Illawarra (93 percent travel by car).

Travel times between Western Sydney and the Illawarra are currently significant and limit economic opportunity for residents. From Wollongong, it takes 114 minutes to reach Parramatta, 125 minutes to reach Liverpool and 131 minutes to reach Campbelltown by passenger rail.

With the significant growth in economic opportunities inherent in the Western Sydney economic zone, including the planned airport and aerotropolis, the number of people travelling there from the Illawarra for work by 2041 is estimated to be 32,000¹⁰. Conversely, recreational and educational opportunities for Western Sydney residents located within the Illawarra-Shoalhaven are expected to see numbers travelling from Western Sydney grow also.

In terms of freight, Transport for NSW data indicates that freight rail demand will reach the network capacity (maximum number of rail paths) by 2036¹¹, while Infrastructure NSW had previously put this at 2030¹².

In 2041, the planned activation of a container terminal by NSW Ports at Port Kembla is expected to handle 530,000 Twenty Foot Equivalent Units (TEU) per annum, which will generate an additional 9,300 train paths to the region's rail network as well as adding 1.6 million road trips to the region's road demand¹³.

The Illawarra Business Chamber is concerned that no solution to the region's looming rail network capacity timeframe of 2036 is currently included in the Draft Plan.

Analysis of options

To address these imminent capacity issues, in 2017 the Illawarra Business Chamber commissioned SMART Infrastructure Facility at the University of Wollongong to investigate solutions to address the Illawarra's freight and passenger rail challenges. Using a cost-benefit ratio approach, the resultant report¹⁴ found the following:

- South Coast Line upgrade – would require shortening the distance travelled through a combination of line straightening, gradient reduction and tunnelling. To reduce travel times between Wollongong and Sydney by 30 minutes, 12 km of tunnelling would be required at an estimated cost of \$2 billion. The Cost Benefit Ratio of this proposal was 0.48 at a standard 7 percent discount rate.
- South West Illawarra Rail Link (SWIRL) – by completing the 35 km Maldon-Dombarton rail line (abandoned in the 1980s) to an electrified dual-purpose track (passengers and freight), with dual track alignment (except for the two main bridges and the 4 km Avon Tunnel), Wollongong (and Port Kembla) can be connected to the Main Southern Line at Maldon and hence south western Sydney. The report found the concept to be feasible, at an estimated cost of \$1.7 billion and a Cost Benefit Ratio of 1.13 at a standard 7 percent discount rate.

⁸ Australian Bureau of Statistics Census 2016

⁹ SMART (2020) *ibid*

¹⁰ SMART (2020) *ibid*

¹¹ TfNSW (2018) *NSW Freight Commodity Demand Forecasts 2-16-2056* Transport Performance and Analytics

¹² INSW (2018), *State Infrastructure Strategy*

¹³ KPMG (2019) *Quay Conclusions*

¹⁴ Report: *Upgrading Rail Connectivity between Illawarra and Sydney*, SMART Infrastructure Facility, University of Wollongong (2017)

- Moss Vale-Unanderra Line upgrade – was found to have spare capacity and can accommodate additional freight movements, but the steep gradient (3.3 percent) of parts of the line deters further upgrades to expand capacity. Subsequent analysis in the 2020 SMART report made an initial assessment that to upgrade the line to a modern standard would approach \$2 billion.

In 2020 the Illawarra Business Chamber commissioned a second study from SMART Infrastructure Facility to examine the SWIRL proposal (as the most cost-effective solution to the Illawarra's rail capacity constraints) in light of developments contained within the Western Sydney City Deal, including the airport, aerotropolis and the Sydney Metro - WSA.

The optimum solution and benefits

The 2020 Report¹⁵ assessed that the most cost-effective option to connect the Illawarra-Shoalhaven to Western Sydney is via a SWIRL, and that further stages of the proposal should be considered to realise the complete benefits.

Specifically, the research recommended extending the SWIRL in three stages so that the Illawarra-Shoalhaven would eventually be connected by freight and passenger rail from Port Kembla through to St Marys, via the Western Sydney Airport and the Wilton Growth Area.

This expanded concept (see Figure 1.) is estimated to deliver a regional economic impact of \$3.551 billion p.a. by 2036 in net present value terms (at a 7 percent discount rate).

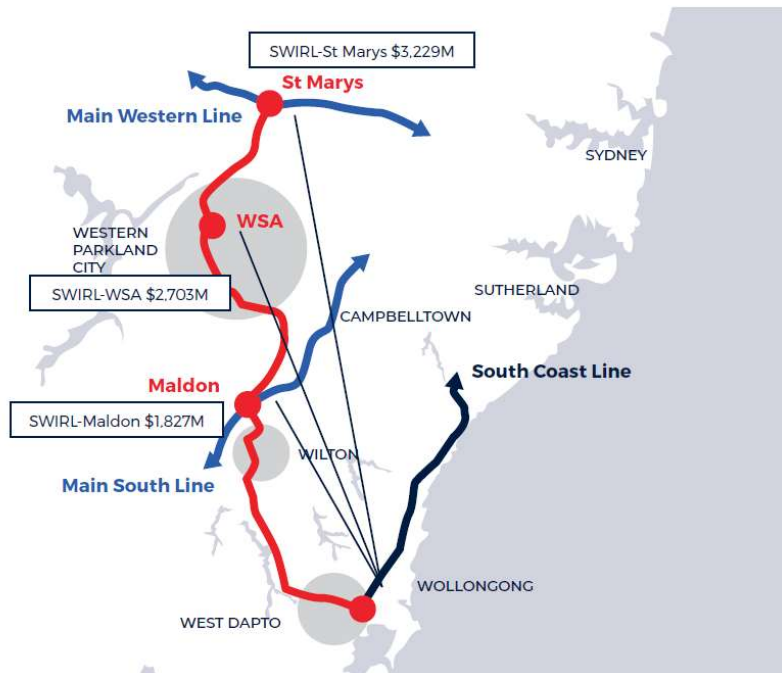


Figure 1

Benefits to commuters

SMART found that by 2041, on a completed SWIRL from Wollongong to St Marys, via Wilton, 19,100 daily commuters would experience a 15-20 minute faster journey to Western Sydney compared with current road or rail trips.

By enabling the growth of local jobs, through greater connectivity and reduced congestion, it will also reduce the proportion of commuters from the growing Illawarra and Wollondilly regions to Greater Sydney. Projected journey time improvements are shown at Figure 2 (p. 10).

Benefits to freight

The SWIRL-St Marys proposal will address the Illawarra's 2036 freight capacity peak, when the movement of inbound coal, grains and goods and outbound steel, vehicles and construction materials will reach the maximum number of rail paths available on the South Coast Line.

¹⁵ SMART (2020) ibid

With a container terminal developed at Port Kembla from 2041, it is expected the Port will progressively capture 530,000 TEU p.a. and add 9,300 train paths and 1.6 million road trips to annual freight demand. This is a 49 percent increase in rail demand and a 21 percent increase in road trips. Without intervention by 2036, freight capacity constraints will cost the economy \$230 million p.a. in 2041.

Economic benefits

1. Busting congestion: The SWIRL-St Marys option will relieve rail and road congestion though the east-west Sydney corridor by providing a freight bypass to the South West. Regionally, SWIRL-St Marys would relieve congested major roads connecting the Illawarra and south-western Sydney: Picton Road, Appin Road and Heathcote Road.
2. Reduced time travel cost for commuters: A passenger rail link between Wollongong, Wilton and St Marys delivers an annual productivity gain of \$75 million by 2041 due to faster travel times for commuters. More time with family delivers benefits that cannot be measured.
3. Best return on investment: SWIRL-St Marys returns a Cost Benefit Ratio of 1.05 at a 7 percent discount rate, and 1.67 at a 4 percent discount rate over a 50-year asset life (arguably Treasury should employ a 4 percent discount rate). The SWIRL to Maldon proposal alone delivers a net economic benefit of \$2.8 billion in net present value terms by 2036.



Figure 2

Recommendations

Relevant recommendations of the SMART report (2020) that should be adopted within the Final Plan are as follows:

1. The NSW Government to commission a detailed engineering feasibility study and a business case analysis, including land value uplift, of the SWIRL-St Marys option.
2. Planning and design work for the SWIRL-Maldon section to commence immediately in order for the line to be operational by 2036, including the Wilton rail station and the connection to the Main South Line at Maldon.
3. SWIRL-St Marys to be operational by 2041 in order to enable the dispatching of containers from Port Kembla to Western Sydney and beyond.

Relevant recommendations of the SMART report (2020) that should be noted within the Draft Plan as follows:

4. Current planning for the Outer Sydney Orbital to take into consideration the concept of a dual freight-passenger alignment up to St Marys (SWIRL-St Marys)
5. 'Corridor preservation for Outer Sydney Orbital road and rail/M9' should be brought forward as a high priority project (0-5 years) in order to make significant land acquisition savings.

Future infrastructure initiatives

The Illawarra Business Chamber seeks to ensure that near term transport constraints are addressed adequately in the Draft Plan as a priority. However there are two future transport initiatives proposed for the region that the IBC wishes to outline its position on:

1. Outer Sydney Orbital – This transformative project to link the North West and South Western Growth Areas all the way through to the Illawarra is scheduled for investigation within 20 years in the Draft Plan. It is supported by the IBC as a long-term visionary project. Consultation on Stage 2 of the corridor is currently underway (closing 29 January), and the IBC is concerned that both proposed corridors pass through the Appin Precinct which is earmarked for major development of housing and population growth. IBC's submission (to be delivered jointly with the Western Sydney Business Chamber) will note that Picton Road is the preferred alignment for the future Outer Sydney Orbital to facilitate its connection to the Illawarra-Shoalhaven; particularly given the planned upgrade of that corridor.
2. Fast Rail – the Draft Plan notes that: "Transport for NSW is currently developing a Fast Rail Network Strategy for NSW [...], which will present a blueprint for how fast rail could be delivered and includes the corridor between Sydney and Bomaderry." The IBC looks forward to reviewing the Strategy, and notes that it is highly unlikely that Fast Rail project can be delivered within several decades of the looming network congestion point that its research has identified will occur in 2036, and therefore a SWIRL should be pursued as a near-term solution.

Recommendations

1. **The Picton Road Motorway upgrade should be delivered by 2025.**
2. **The Mount Ousley Interchange should be delivered by 2025.**
3. **A project should be initiated to extend the third southbound lane commencing halfway down Mount Ousley (approx. 2.5 kms).**
4. **The first three stages of the M6 Motorway should be included in the Draft Plan and scheduled for delivery by 2040.**
5. **In relation to the South West Illawarra Rail Link (SWIRL) concept:**
 - a. **Planning and design work for the SWIRL-Maldon section should commence immediately in order for the line to be operational by 2036, including the Wilton rail station and the connection to the Main South Line at Maldon.**
 - b. **SWIRL-St Marys should be operational by 2041 in order to enable the dispatching of containers from Port Kembla to Western Sydney and beyond.**
6. **Picton Road should be the preferred alignment for the future Outer Sydney Orbital to facilitate its connection to the Illawarra-Shoalhaven, and not either of the Appin options being proposed.**

About the Illawarra Business Chamber and Illawarra First

The IBC is the peak business organisation and the regional chamber that supports businesses and local chambers across the Illawarra-Shoalhaven, primarily, as well the South Coast and Capital regions, and is a division of Business NSW (formerly known as the NSW Business Chamber) – a founding member of the Australian Chamber of Commerce and Industry.

We develop policy, advocate to all levels of government on issues affecting businesses, undertake research to guide greater public and private sector investment in economic infrastructure, and support the development of workforce capacity and skills in our region.

Illawarra First is the top tier of IBC membership, harnessing best practice and thought leadership to progress key priorities including improving connectivity with Sydney, realising greater value from existing strategic infrastructure and leveraging competitive advantages to bolster economic growth. Its membership comprises a select group of leading businesses in the Illawarra, sharing a commitment to driving the development and prosperity of the Illawarra.