

## **SEATS Submission to:**

### **Illawarra Shoalhaven Strategic Regional Transport Plan**

SEATS (South East Australia Transport Strategy) provides highly co-ordinated and influential advocacy for the development of transport infrastructure in the South East Australian region that supports sustainable economic development and the prosperity of its constituents.

SEATS, formed in the mid-1990s, is an alliance of Local Government and other Government agencies together with industry that is concerned about the state of the freight transport network across south eastern Australia including ACT. The organisation meets quarterly, has a paid secretariat and prioritises projects across all forms of transport that its membership has identified as worthy of Government and operator support.

Some projects have commenced either in a planning or construction phase. Some projects extend into Victoria's Gippsland region as well as the ACT. It is pointed out that much of the freight concerned is not destined for metropolitan markets but from manufacturing node to manufacturing node or to port facilities for export.

#### **Context**

The SEATS region consists of several regional production areas. The Illawarra-Shoalhaven is industrialised with steel manufacture, production of chemicals and nutraceuticals, grain processing and food production, building component manufacture, the southern tablelands has strong agricultural production, quarry supplies and timber processing. Out of Victoria's Gippsland comes horticultural produce requiring key freight and transport connections into Sydney.

The region has significant quantities of inbound and outbound freight, with freight travelling through Port Kembla and the Port of Eden being substantial bulk commodity movements in the region. The movement of freight to and from the region relies predominantly on existing road and rail networks. Key freight corridors that enable the movement of freight include the M1 Princes Motorway (Mount Ousley Road), Picton Road, the Princes Highway as well as the South Coast rail line and the Moss Vale to Unanderra rail line. The Monaro Highway is an important corridor between metropolitan Sydney/Illawarra Shoalhaven and the Gippsland areas within Victoria.

#### **Introduction**

This submission refers to transport infrastructure within the local government areas of Wollongong, Shellharbour, Kiama and Shoalhaven and the adjoining areas of Sutherland/Sydney, Wollondilly/Wingecarribee and Goulburn Mulwaree C, Queanbeyan Palerang RC and Eurobodalla SC and beyond.

SEATS is fundamentally concerned about the movement of freight within the Illawarra Shoalhaven, into and out of Illawarra Shoalhaven as well as freight transiting through the Illawarra Shoalhaven, including Port Kembla.

Although all forms of transport are supported by SEATS as they may best fit the task, the issues relating to the Illawarra Shoalhaven Strategic Regional Transport Plan mainly relate to road and rail assets and the major freight transport intermodal terminal at Port Kembla.

Two airports exist within the Illawarra Shoalhaven but the focus of activities at each is quite specific. HMAS Albatross near Nowra is a military airport utilised mainly for helicopter (rotary wing) training for ADF pilots and aircrew. Shellharbour Airport provides limited RPT services to Brisbane and Melbourne with a number of other general aviation resident services. Both of these airfields feature heavily when emergency situations occur within the region – bushfire and flooding.

It becomes obvious that the Illawarra-Shoalhaven is enveloped by the SE&T region and more specifically the Shoalhaven. Therefore the freight transport linkages between Wollongong/Pt Kembla and Nowra/Bomaderry with the Hume Highway and Monaro Hwy corridors as well as the Moss Vale to Unanderra Rail link are of vital importance to the economy of the Illawarra Shoalhaven.

Of immense interest to SEATS is the crossing of the **Illawarra Escarpment**. Each of the 9 escarpment crossings including the Monaro Hwy out of Cann River to the Bulli Pass in the northern Illawarra are all important to their immediate communities. **BUT** the importance of each pass should be correlated to the existing freight task, or a task that can potentially exist, rather than the shortest distance for a light vehicle commute. This topic will be expanded later in this submission.

The impact of severe weather events will also play a role with the Illawarra Escarpment crossings going forward. Many of these mountain passes were built in the 1800s and their ability to maintain a sustainable freight corridor is questionable and industry will adjust its transport patterns to network connections that provide a more resilient route for HVs. An articulate horse drawn cart of approximately 10m is a far cry from a double articulated B-double of 26m.

The SEATS submission to the NSW Government, made in March 2024, made reference to the Illawarra Escarpment crossings and their vulnerability to severe weather events. This point has been identified by the **Freight Policy Reform Advisory Panel** and no doubt will have recommendations to the NSW Government regarding this aspect of the State's infrastructure and its inadequacy as a resilient and sustainable asset to allow the efficient delivery of freight in NSW. These points will be raised again later in this submission.

Transport NSW has recently announced the development of an **Illawarra Rail Resilience Plan**. SEATS has written to the Minister for Planning/MP for Wollongong for SEATS to be included as a stakeholder for this piece of work and sought that the scope of the study area should include the freight that utilises the Moss Vale to Unanderra rail line as it forms an important piece of the freight utilising the South Coast Rail Line.

At this point SEATS would like to demonstrate one regional industry that is showing its commitment to freight rail as was [posted on LinkedIn](#) on 6/11/2024. The

importance of regional transport assets in the Illawarra Shoalhaven to industries such as this need to be supported, including:

- Moss Vale/Unanderra Rail line (connecting the Main South Line to South Coast Line)
- South Coast Rail Line (Coniston Junction to/from Bomaderry)
- South Coast Rail Line (Bomaderry to/from Port Botany)

Enhancements to the South Coast Rail Line between Sydney and Bomaderry will be raised to allow improved availability for more frequent commuter rail services as well as freight train paths that can improve productivity. The limitations of a single track south of Dapto can be reversed by **improving the opportunity for trains to pass** at various locations.

The recently completed works to duplicate the Princes Hwy south to Jervis Bay Road is a significant improvement. The Princes Hwy upgrade program, being funded by the Australian and NSW governments, will further extend the region's major transport artery to Batemans Bay and further south and is strongly supported by SEATS.

To relieve the daily congestion through Nowra, an extension of the Princes Hwy's current 6 lanes is required south of Plunkett St through to South Nowra and eventually to Jervis Bay Rd. With recent residential developments in the Moss Vale Rd area to the west of Bomaderry, this area is now becoming part of the "Nowra congestion" issue. T4NSW should look at widening Moss Vale Rd to 4 lanes from Cambewarra to Bomaderry.

The daily peak hour congestion on the M1 between Tongara Rd and the University of Wollongong campus at Gwynneville is considered to be counter productive to the concept of a "freeway" to allow the through traffic, including freight vehicles, to flow. Proposals to **increase the number of ingress/egress ramps** raises several issues. Firstly will there be enough travel lanes to accommodate a significant increase in vehicle numbers? Secondly the congestion points are generally caused by the safe merge requirements at each ingress and/or by the queued traffic held in the egress points spilling into the travel lanes and stopping/slowng the through flow.

The congestion in and around the Shoalhaven River crossing at Nowra Bomaderry has been significantly resolved by the third bridge being recently completed. Internal congestion on the Princes Hwy within Nowra cannot be resolved through active and public transport alone, and requires significant investment along the existing State Road network (both Princes Highway and Moss Vale Road). Ultimately a Nowra Bomaderry bypass will be required.

## **RAIL ISSUES**

For commuter services, the South Coast Rail Line is the only piece of infrastructure involved. Running from the Sydney metropolitan rail network (MRN) through Sutherland it extends south to Bomaderry being twin track from Sutherland to Dapto and continues on a single track from Dapto to Bomaderry.

The South Coast Rail Line is electrified as far south as Kiama. Diesel passenger trains operate between Kiama and Bomaderry which necessitates the changing of trains at Kiama. The use of buses between Kiama and Bomaderry is common at night and during track possessions for maintenance. SEATS has no issue with the operating arrangements given the current infrastructure and rolling stock.

The diesel passenger sets are coming due for replacement and it has been mooted that a hybrid train that can travel on both the electrified and non-electrified sections would be the replacement solution. For efficiency, these hybrid trains may not go all the way into Sydney but as far as Wollongong may be part of the ultimate solution.

The commuter train options moving forward will impact the frequency and ability to operate more frequent freight paths between Bomaderry and the source of these freight trains at Unanderra/Coniston Junction (from Moss Vale). When combined with strategically located passing loops, a greater frequency of passenger and freight trains would be able to utilise the South Coast Rail Line between Unanderra/Coniston Junction and Bomaderry.

Efficiency/productivity improvements will require an upgrade of the signal system.

The increase in capacity at the Manildra plant at Bomaderry will require more grain being transported to that plant from western NSW. Rail is the preferred transportation method and there will be requirements to increase the capacity of this rail sector between Moss Vale and Bomaderry. SEATS suggestions for specific improvements include:

- Turnout required between Unanderra and Coniston Junction for train turnaround for trains >600m
- Dunmore Siding – Crossover (as per Fixing Country Rail application RNSW1385) is undertaken and available to enable freight trains to have more efficient paths for an expanding freight task to/from Bomaderry
- Bomaderry Station Yard Extension – extension of northern boundary & signal system (as per Fixing Country Rail application RNSW1392) be undertaken and available to enable freight trains to have more efficient access to the Bomaderry rail/road intermodal for the expanding freight task
- Toolijooa Passing Loop – to further investigate the implementation of this project to create more efficient paths for freight (and passenger) trains on this single track route between Dapto and Bomaderry

Additionally, SEATS seeks the reassurance within the Illawarra Shoalhaven SRITP to:

- Ensure rail access between the Main Southern Line at Moss Vale and the South Coast Line at Unanderra is maintained and available to freight trains for an expanding freight task
- Ensure rail access between Bomaderry and Port Botany is maintained and adequate paths are available to freight trains of up to 1200m.
- Ensure freight rail access to the export sea port at Port Kembla

## **ROAD ISSUES**

## **Public Transport**

Firstly there are public transport (bus) services that operate within Illawarra Shoalhaven. The “local” services that operate with hubs primarily at Wollongong and Nowra serve local commuter requirements.

There are services that run out of Sydney down the Princes Highway through Nowra to Eden connecting with Vline services that operate between Melbourne & Narooma via Eden

Several bus services operate between the Princes Hwy and the Hume Hwy/Southern Tablelands. These services offer interconnectivity between the coastal and inland rail/road networks and commuter services. Some co-ordination of timetabling does exist but with limited train services to Canberra and Wagga/Albury it is not appealing to customers as a “suitable” alternative to travelling by car.

There is also a desire to operate a bus service from Nowra/Bomaderry to Canberra once the route through Nerriga and Tarago is compliant for vehicles over 15t. Users would be ADF workers, students at ACT facilities and people using medical and legal services.

## **The zero-emissions future**

Improvements to the Princes Hwy corridor do offer reduced emission routes for freight vehicles.

A major encumbrance in achieving a zero emission future is the fact that the Illawarra Shoalhaven region has two geographic hinterlands – the coast and the tablelands. The Illawarra Escarpment divides the coastal areas by approximately 600m vertically from the tablelands. The sheer challenge of ascending/descending the limited number of mountain pass crossings is a reality that will test the zero-emission goal.

## **An Evolving Freight Task**

Mt Ousley Rd/Picton Rd performs the greatest share of moving freight from the Princes Hwy corridor to the Hume Hwy corridor and then to Sydney to the north or south to southern NSW and interstate.

It is becoming evident that more transport operators are utilising HV configurations best suited to the first/last mile considerations. The use of A-double configurations is beginning to be preferred now that the new Shoalhaven River crossing provides access to the south of the river at Nowra.

The crossing of the Shoalhaven River at Nowra will no longer be a barrier to allow HML/PBS vehicles moving south along the Princes Highway. There are other structures however that may influence permits being granted at Falls Creek, Wagonga Inlet and Brogo River.

The viability of utilising Mt Ousley Rd/Picton Rd for moving freight into/out of areas south of Nowra to locations in southern NSW or interstate remains questionable. This would be more practical for freight from Nowra and areas south if an east-west

HML freight route could be established to extend the acceptable escarpment crossing based on MR92 with a link from Nerriga to the Hume Highway at Goulburn.

At Port Kembla, HVs connecting to the National Highway network are similarly utilising these higher productivity vehicles.

The use of the higher productivity vehicles is limited for any east-west freight task by the alignment, both horizontal and vertical, of the mountain passes. Many regional industries are disadvantaged by not being able to use higher productivity vehicles. Routes such as Snowy Mountains Highway, Kings Highway, MR73 through Kangaroo Valley and Illawarra Highway are all HML restricted.

### **The Illawarra Escarpment and the Freight Task**

Whilst not unique to the South Coast of NSW, the existence of the Illawarra escarpment is a real barrier to the movement of freight. There are only a few of the mountain passes that are suited to HVs that connect from the coast to the Southern Tablelands and these are with those routes with the capacity to cater for PBS/HML bolded:

- Bulli Pass (Princes Highway at Bulli to Appin/Campbelltown)
- **Mount Ousley Rd (between M31/Hume Hwy at Wilton and Princes Highway at Wollongong)**
- Macquarie Pass (Illawarra Highway between Hume Hwy at/near Moss Vale and Shellharbour)
- Route B73, Moss Vale Rd through Kangaroo Valley (between Hume Hwy at Moss Vale and Princes Hwy at Nowra)
- Main Road 92 (between Nerriga and Princes Hwy at Nowra) This route is restricted westward beyond Nerriga for HV over 15t
- Kings Highway (between Canberra/Queanbeyan and Batemans Bay)
- Snowy Mountains Highway (between the Monaro Hwy near Bombala to Princes Hwy near Bega)
- **Imlay Rd, a Forestry Commission road between Monaro Hwy and Princes Hwy south of Eden**
- **Monaro Highway (Princes Hwy at Cann River to Bombala, ACT and Hume Hwy through to Sydney)**

The importance of Picton Rd/Mt Ousley Rd cannot be understated in the movement of freight between and through the Illawarra Shoalhaven and the inland highway corridors.

The upgrade of Picton Road junction with the Hume Hwy/M31 at Wilton and the Mount Ousley interchange will contribute to the integrated approach that governments are taking across the transport network to better link ports with key freight precincts as well as key domestic distribution centres.

The interchange at Wilton where Picton Rd intersects with the Hume Hwy will also be a vital part of the freight network servicing the Illawarra Shoalhaven region.

## **Climate Change – Natural Disasters**

Recent East Coast Lows have brought about a new dimension to the escarpment issue. At some points during 2022, closures and restrictions on the various mountain passes placed imposts on hauliers and industry, including tradesmen, travelling between Illawarra Shoalhaven and the Tablelands. Thankfully Mt Ousley held up although subject to lane restrictions. **SEATS believes a second east-west freight route is required south of the Shoalhaven River and Main Road 92 forms the basis for this alternate all weather route.**

SEATS has resolved and requested of Transport for NSW to assist in the upgrading of MR92 from Nerriga, west to Tarago and then north to Goulburn along Braidwood Rd to intersect with the Hume Motorway. This route would provide a viable alternative for grain movements by road from western NSW to Bomaderry and stockfeeds and food ingredients from Bomaderry to southern NSW and interstate processors. By diverting this substantial quantity of freight away from Mt Ousley Rd/Picton Rd, up to 30x A-doubles/day, additional capacity would be available on this route.

**HV Rest areas** are an essential safety feature for long and medium haul routes. SEATS strongly agrees with the statement that the Kings, Monaro and Princes Highways are inadequate in this regard. Further, HV Rest Areas need to be considered available for HVs travelling in either direction with safe ingress and egress points.

The issues of first/last mile access is more than suiting the environment and planning guidelines. Buffers which allow expansion of the access corridor to allow the movement of higher productivity HVs, queuing lanes at intersections etc need to be allowed when these corridors are planned and built. A 20m wide easement will not cut it for an industrial intersection!

## **Recent resolutions by SEATS that are relevant to a Strategic Integrated Transport Plan for the Illawarra Shoalhaven**

- SEATS strongly supports the **upgrading of the Mt Ousley/Picton Rd corridor**, including the works near the University of Wollongong
- SEATS requests that Transport for NSW **undertake a “what if” investigation** on the provision of road and rail links across the Illawarra Escarpment with the view to identifying and supporting a second east-west road freight route which can satisfy future freight requirements in most natural disasters
- SEATS **shares with industry the concern that the reliability and sustainment of the key east-west escarpment freight crossings need to be prioritised** by the NSW Government in its maintenance and upgrade programs.
- In the interest of road safety and the “Towards Zero” policy, SEATS believes that adequate **Heavy Vehicle Rest Stops** need to be provided at driving intervals of 1 hour on all state highways for both directions of travel.
- SEATS strongly requests the Australian government ensure that within 5 years **all national and state highways achieve a 95% mobile telephony reception coverage** and that the rollout commence on the Monaro Highway and the Princes Highway between Sydney and Melbourne, especially in the areas adjacent to the NSW/Vic border.

## **Question for the Team developing this Plan**

How much consultation has there been between the industries that generate the freight tonnages and their plans for the future? SEATS recommends that a **working party be established of the major freight generating industries** within Illawarra Shoalhaven and in the areas adjacent to this region that move product into, through or out of Illawarra Shoalhaven by either rail and road.

Similarly, a greater understanding of the interests within Port Kembla be another working party outcome with port interests around shipment of existing freight, the future handling of containers and the interests of the Offshore Renewable Energy proponents, Defence, Bluescope and other major players in this precinct.

## **Further Comments**

To realise a region where to “live, work and play” are core objectives then access to realistic transport routes and services between home and work, work and education, home and education must also be addressed, not just the broader community considerations.

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