



31 March 2025

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Transport for NSW

By email: roadsactfeedback@transport.nsw.gov.au

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Submission: NSW Roads Act 1993 Review

The National Growth Areas Alliance (NGAA) welcomes the opportunity to respond to the *NSW Roads Act 1993* Review. The NGAA is the peak body for local governments in Australia's fast growing outer metropolitan growth areas and advocates to state and federal governments on growth area challenges and opportunities.

Nationally, our growth regions represent more than 5.6 million people living in Australia's five largest capital cities. Our members in New South Wales: Blacktown City Council, Penrith City Council, Camden Council, Campbelltown City Council and Wollondilly Shire Council together with the other growth areas in greater Sydney, Liverpool City Council and The Hills, represent 1.4 million residents or just over one quarter of Sydney's population.

Geographically, Australia's growth areas are located on the edge of Australia's five largest capital cities and were designated for future urban growth when they were established more than twenty years ago. Our growth areas comprise established urban centres like Blacktown, Campbelltown, Liverpool and Penrith and major urban release areas still under development, like Camden, while others, like Wollondilly include regional townships and agricultural land, straddling the metropolitan and regional boundary earmarked for significant development in the coming decades.

Our members are united by shared experiences of population growth rates at double the national average, significant greenfield development and long-term under-investment in vital infrastructure. Road infrastructure is critical infrastructure and a top priority for growth areas as new development rapidly transforms our metropolitan regions.

The National Growth Areas Alliance (NGAA) therefore welcomes the opportunity to respond to the NSW Government's review of the *Roads Act 1993* to create a more contemporary planning and management framework for roads and streets across NSW. The productivity, growth, and global competitiveness of Australia's cities requires the cost-efficient flow of people, goods and services through and around them.

The NGAA is advocating for recognition of growth areas as significant metropolitan regions requiring targeted planning and investment of critical infrastructure like roads and transport to support our communities and optimise the functioning of our cities.

Our research has shown under-developed road infrastructure in growth areas contributes to congestion, pollution, and costs in time to people who live in growth areas. There is a high reliance on the road network in growth areas for commuting as access to public transport is more limited¹. Commuters in outer growth suburbs face the double challenge of distance from jobs and poor road infrastructure. This can make even a short commute time-consuming for car commuters and unattractive for a mode shift to buses that also get caught in congestion. Walkability in growth areas is also less than other areas in our capital cities². Without adequate and safe pedestrian and bicycling infrastructure in growth areas walking and cycling rates will remain lower in growth areas than non-growth areas.

As noted in the Discussion Paper³, roads and streets provide addresses for 3.3 million properties in NSW. They play a crucial role in the liveability of the places in which we live and work and are foundational to the functioning of our cities and regions and the economy. It is in our outer metropolitan growth areas where the road network is rapidly expanding and number of properties and people that depend on it are multiplying at a faster rate than elsewhere.

In the past two decades between 2001 and 2021 the number of single detached dwellings in growth areas in Greater Sydney increased by 45% from 261,061 dwellings to 377,274 dwellings, compared to 22% growth for Greater Sydney overall. New housing development in growth areas represented 58% of the increase in the number of single detached dwellings in Sydney. Even with the trend and policy direction towards urban intensification, the Department of Planning forecasts another 76,600 new homes to be built in growth areas in the next five years, representing 44% of the total housing supply forecast in Greater Sydney, and potential for more than 270,000 dwellings in rezoned greenfield precincts⁴ into the future.

The Discussion Paper also notes that around 90% of roads and streets are operated and maintained by local councils as the road authority, underscoring the need to delegate more powers to councils. Although not in scope for this review, dedicated long term investment for major upgrades to roads, and for public and active transport are top advocacy priorities for growth areas, to reduce congestion, ensure safety of all road users, improve movement of freight and passenger vehicles and enable access for their communities to work, education, shops, health, and community facilities and services.

We therefore welcome the aims of the review and suggestions made in the Discussion Paper to better enable Transport for NSW and councils as decision makers and recognise the function of roads not only for vehicle traffic but for all road users as useful steps towards these outcomes.

¹ National Growth Areas Alliance, 2024 [From deficit to equity: investment solutions for today's infrastructure needs and tomorrow's housing in outer metropolitan growth areas.](#)

² NGAA and Australian Urban Observatory 2024 [Growth Areas Liveability Scorecards for Sydney](#)

³ Transport for NSW 2025, [Roads Act 1993 Issues Paper](#),

⁴ NSW Department of Planning 2024, [Greater Sydney Urban Development Dashboard](#)

This submission will broadly address issues for growth areas related to the NSW Government's four targeted objectives for improvement as outlined in the Discussion Paper. They are ensuring:

1. More contemporary uses for roads and streets that are safe and responsive to community needs.
2. Faster local decision making with appropriate mitigations to manage network risk.
3. A streamlined and easy to use statute that keeps pace with change.
4. A more operationally effective statute.

In summary, **the NGAA recommends that the NSW Government, and Transport for NSW, recognise and specifically address the challenges of growth areas councils and the important role they play in planning, delivering and managing the road network as part of this review of the Roads Act 1993.**


To this end, we believe the *Roads Act 1993* review provides a timely opportunity for the NSW Government and Transport for NSW to

- Consider reducing congestion as an objective of the Act
- Elevate safety and transport accessibility into the objects of the Act
- Address the rights of access and allocation road space for active transport, rapid transit, micro-mobility, and the needs of vulnerable road users in the Act
- Align road classification with strategic land use planning
- Acknowledge that local councils have sound knowledge of their communities and environments, and undertake extensive strategic planning and community engagement that makes them the best placed decision makers for the management and operation of local roads, including setting speed limits
- Enable councils as road authorities to have sufficient power and resources to regulate access and restrictions to public roads effectively
- Facilitate electronic data sharing to assist councils in the operation and maintenance of the local road network.

The NGAA commends Transport for NSW for undertaking the review of the Roads Act 1993 and supports the submissions of our members councils and their recommendations. This submission aims to highlight some the distinctive nature of the challenges for growth areas councils in relation to the road network. By recognising these challenges faced by growth areas councils, the review Roads Act 1993 will be better tailored to accommodate the needs of all road users, wherever they may live.

Should you wish to discuss any of the matters raised in this response, please contact Research and Policy Lead, Anne Hurni, anne.hurni@ngaa.org.au.

Yours faithfully



Bronwen Clark
Executive Officer
National Growth Areas Alliance

Feedback on the review of the NSW Roads Act 1993

1. More contemporary uses for roads and streets that are safe and responsive to community needs

Reducing congestion is a key community concern

Rapid greenfield development in growth areas has significant impacts on the road network at all levels across Transport for NSW's movement and place framework⁵. New development presents challenges for connectivity to movement corridors, congestion on local roads and high volumes of vehicle traffic discouraging use of active travel modes. Greater attention to mitigating the challenges of planning and delivering a safe and efficient road network in growth areas can help improve liveability and lift productivity.

Sydney's growth areas are clearly identifiable in the map in Figure 7 (page 16) of the Discussion Paper, showing the historical expansion of the area over the past century, yet they are not further analysed in respect to the implications for managing growth and an expanding road network at a time when the region is on the cusp of major transformation with the opening of the Western Sydney International airport in 2026.

Sydney's growth areas have seen rapid residential greenfield development since the early 2000s but at increasing distance from the rail network. As a result, communities in growth areas, like Camden, are highly reliant on the road network and private vehicles. They surround the major Sydney metropolitan area freight vehicle routes (12 - A9 to M7 / M7 to A9, and M4), and the location of freight and logistics hubs closer to motorways creating increased congestion on the local road network as well as on motorways. This poses a potential conflict of competing functions for the road network between the movement function (right of passage) and access function (access to property) in these areas.

Case Study: Camden Council South-West Growth Area

In 2006 Camden local government area had a population of 49,645 people, which has more than doubled within ten years to 119,325 in 2021⁶. Its population is projected to surge to over 257,000 residents by 2046. Camden Council now manages significant road and traffic infrastructure assets including 779 kilometres of roadways, 684 kilometres of footpaths and cycleways, 1,242 kilometres of kerb and gutters, and 24 road bridges. Annual cost of maintaining the network is significant with \$1.475 million dedicated to road maintenance and repairs in 2023-24⁷.

Over the same period, traffic volumes on nearby Hume Highway heading toward Sydney, have increased by around 10,000 vehicles per day from 44,291 in 2006 to 54,243 vehicles in 2019⁸. Camden can play a key role in supporting government objectives to unlock quality, affordable housing supply with timely investment in infrastructure and services. The road network, however, requires substantial upgrade to achieve Transport for NSW's desired balance between movement and place and to minimise congestion on both local streets and freight routes.

⁵ Transport for NSW [Movement and Place](#) Design of Roads and Streets

⁶ ABS Census of Population and Housing, 2021 and 2001

⁷ Camden Council 2024 [Annual Report](#)

⁸ Transport for NSW [Traffic Volume Viewer](#), Hume Highway, north of Kendall Drive, near Casula

Elevate safety and accessibility as objectives in the Act

Local councils have important designated responsibilities in supporting the safety of their communities on the road network. They have local traffic committees to inform councils and road safety officers that provide important road safety education and other community initiatives to promote safety in line with the NSW Government Safe Systems approach. As noted in the Discussion Paper, the Safe Systems approach was established after the *Roads Act 1993* was legislated and has not been incorporated.

Case Study Blacktown City Council – North-West Growth Area

Blacktown City is a long-established growth area and includes the majority of the 10,000-hectare North-West Growth Area, which was established back in 2003. With an estimated population of over 426,000 residents in 2023, it is now a major metropolitan centre. Over one quarter of its population are school-aged children. Children under the age of 17 years have highest bicycle participation rates of any age group. However, ongoing financial constraints mean that council faces considerable challenges in delivering new active transport infrastructure while upgrading and maintaining existing pedestrian and cycle pathways that would improve safety and support increase rates of walking and cycling, along with the road network, which has been impacted by extreme weather events.

Lower vehicle speed limits on local roads can improve safety and can help encourage walking and cycling. The default 50km/hr speed limit on local residential and neighbourhood streets is inappropriate in many locations. Many areas in Blacktown house families and vulnerable road users along narrow roads. Speeding complaints are among the highest in volume received by council. Current arrangements with Transport for NSW's centralised control are less responsive to community needs and safety concerns. Amending the *Roads Act 1993* to allow local councils to set and enforce speed limits on local roads will address critical issues in the local road network and respond to resident's concerns for lower safe speed limits.

Address active transport, micro-mobility, and the needs of vulnerable road users

While growth area councils advocate for improving road networks, they also support multi-modal transport options for their communities. They make significant investments in active transport infrastructure for their communities.

Active transport infrastructure can also support improved health and wellbeing outcomes in communities who are time poor due to demographics and long commutes. Recent research shows that inadequate bikeways in urban areas, unsafe conditions for cyclists, and lack of connections to major transport hubs, are significant barriers to increasing the number of cycling trips each week.⁹ Off-road shared and separated active transport infrastructure not only supports walking and cycling, these pathways promote inclusion and accessibility for people with disabilities, and older people who rely on personal mobility devices.

Place-based solutions include 'last mile' infrastructure (for example, for e-scooters and e-bikes) and walkable paths and bicycle trails that connect to areas of activity such as shopping centres, community hubs, and recreational reserves. This infrastructure supports transport rich hubs in growth areas even where lower densities exist. This infrastructure

⁹ The Australian Cycling Economy, EY for We Ride Australia 2021, page11.

must be better connected and prioritised, such as providing pedestrian bridge crossings rather than relying on intersection crossings when freeway and arterial roads are upgraded.

2. Faster local decision making with appropriate mitigations to manage network risk.

Recognising council-led strategic planning and community engagement

All councils in NSW are required to implement the Integrated Planning and Reporting (IPR) Framework to guide their planning and performance reporting back to the community, which involve extensive community engagement. This legislative requirement is missing from the diagram in Figure 16 (page 42-43) of the Discussion Paper showing the complexity of the road network planning and development.

Council community strategic plans are used to inform delivery and operational planning that implement community-driven actions, identified in other strategies such as Pedestrian Access and Mobility Plans, Bike Plans, Local Integrated Transport Plans and Road Plans. The Community Strategic Plans determine which actions require capital works, advocacy, regulation or service delivery by council and progress on all actions is reported in council annual reports. These plans are developed through extensive consultation with communities.

Case study Our Blacktown 2041 and Council Community Engagement strategy

Blacktown City Council has had a Community Engagement Strategy in place since 2010 which was revised and renewed in a new Community Engagement Strategy and Community Participation Plan 2024-2028 adopted 28 November 2024. With one of the most socially and culturally diverse communities in Australia, Blacktown City Council a deep understanding of its community and continues to invite the community to participate and give feedback on local priorities through Community Satisfaction surveys and a range of other strategic plans. Their review of their Integrated Planning and Reporting framework documents involved two years of consultations engaging with over 6,000 community members leading to the development of their Community Strategic Plan, *Our Blacktown 2041*. This local knowledge of community needs can inform road maintenance, traffic adjustments, safety improvements and integrating active transport into the network. Being able to draw on this local knowledge and understanding can assist in swift, decisive and appropriate action without the need for Transport for NSW referrals.

Aligning reclassification of roads with strategic planning processes

Road management between Transport for NSW and Councils in NSW provides for three categories of road: State, Regional and Local. The classification of a road empowers Transport for NSW to exercise broad authority over some, or all, aspects of legally classified roads and to provide financial assistance to Councils.

Because of their location on the urban periphery, in many growth areas, large areas of land previously zoned for rural uses and small townships are rezoned for residential and employment and urban precincts. With development, roads that were previously low traffic single lane rural links become the main thoroughfare connecting new communities to their nearest strategic centres or employment hubs.

This is particularly relevant in Greater Sydney where the development of WSI airport is transforming the rural areas of Penrith, Liverpool and Camden into Sydney's next major

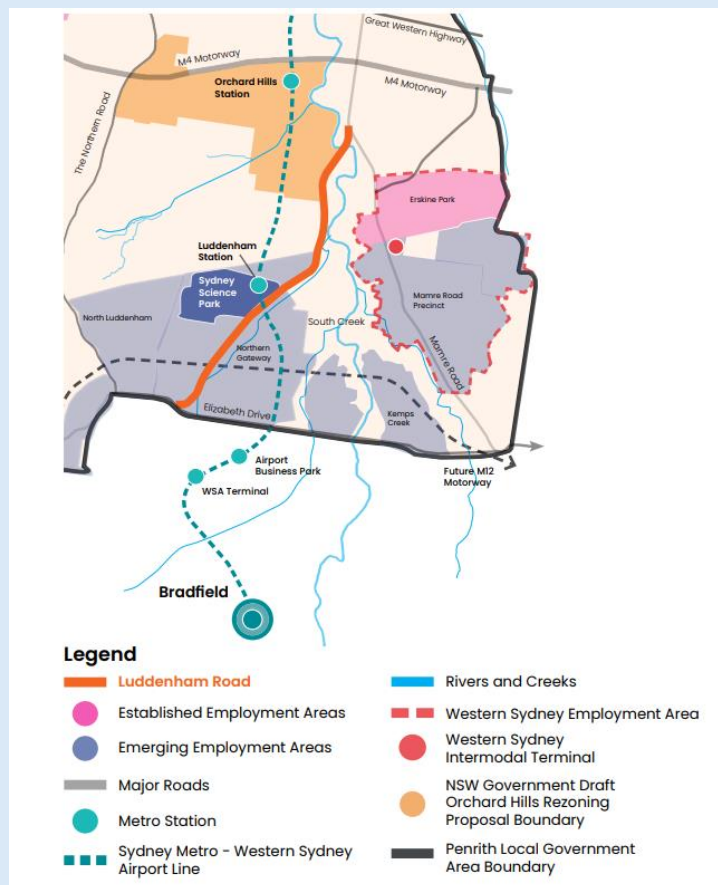
metropolitan centre. It is essential that such significant strategic planning is coupled with the reclassification of local roads at an early stage to ensure the network can be upgraded and fit for purpose as use and traffic volumes changes with development.

Classification of roads has implications for funding for councils as noted in the Discussion Paper (page 39). While councils receive block funding for all roads they control from the Australian Government through Financial Assistance Grants, NGAA member councils are of the view that future population growth should be considered as part of the calculation of the general-purpose component of the program which would provide additional funding to support rapidly increasing communities during the grant period. Furthermore, there is an evident disparity in the classification of roads across greater Sydney that leaves growth areas with fewer classified roads even where population and size of local government areas are comparable with inner and middle areas (see Appendix) and competitive grants programs do not adequately make up the difference in distribution of road funding for roads that are require major upgrades. We therefore look forward to learning more about Transport for NSW's new streamlined process for road category changes.

Case study: Penrith City Council - reclassifying Luddenham Road

The function of Luddenham Road has evolved from a local rural route to a critical transport corridor for Penrith, accommodating substantial heavy vehicle and construction traffic associated with major regional projects. The cumulative impact of this traffic has significantly deteriorated the road's condition, leading to frequent congestion, safety hazards, and unreliable travel times.

These issues disrupt the movement of people and freight and impose a heavy financial burden on Council, to carry out costly reactive repairs and emergency maintenance. Luddenham Road's importance will extend far beyond the construction phase of the transformational projects occurring to the south of Penrith LGA.



It will be a key connection to the Northern Gateway Precinct and Agribusiness Precinct of the Western Sydney International (Nancy-Bird Walton) Airport, while supporting access to the new Luddenham Metro Station. The road will also provide essential links to emerging growth areas, such as Orchard Hills, St Marys and areas east of The Northern Road. Given its strategic role in regional growth and connectivity, upgrading and reclassifying Luddenham Road to a State Road is essential.

3. A streamlined and easy to use statute that keeps pace with change.

As noted in the Discussion Paper, (page 42) “the NSW Government has standardised and streamlined the development assessment process for land use and zoning over the past decade. In the same period the approach under the *Roads Act 1993* to referrals, concurrences and other approvals have not kept pace to the same degree”.

Aligning road network development with regional strategic planning

Like the issue of road reclassification more closely linked to strategic planning, the planning and delivery of upgraded road networks must be more closely aligned to strategic planning to ensure benefits of residential and commercial development are realised. State significant infrastructure and land use development, such as the Moorebank Intermodal terminal in Liverpool and Campbelltown and the WSI airport, the release of employment precincts like Mamre Road must be synchronised with the upgrading of connections to the road network.

Case Study Campbelltown City Council – Connecting Glenfield and Moorebank Intermodal

Campbelltown City is metropolitan centre of the Macarthur Region, a most significant growth corridor in New South Wales. The emerging strategic centre of Glenfield contains a large site of Landcom (NSW Government) owned land directly adjacent to Glenfield Railway Station. This site has been rezoned as part of the Glenfield Place Strategy, which has overall capacity for 7,000 dwellings, but development has not been able to commence. The Cambridge Avenue Upgrade is a key piece of enabling infrastructure to deliver on this precinct’s potential. Cambridge Avenue Upgrade in Glenfield from Moorebank Avenue to Campbelltown Road.

This project would unlock road access to the Landcom site and enable uplift in dwellings and related community infrastructure. This would support delivery of more diverse and affordable housing typologies than what is already offered in Glenfield. This road project would also have enormous benefits in freight and logistics, connecting Moorebank Logistics Park to the Hume Motorway and therefore to Bradfield, Western Sydney Airport and Western Sydney Employment Area.

Transport for NSW has developed the Moorebank Intermodal Terminal Road Access (MITRA) Strategy to address increasing traffic and freight movements in the Liverpool - Moorebank area over the next 10-20 years. The strategy has identified road infrastructure improvements to meet the forecast growth of Liverpool CBD and regional traffic, together with construction of the Moorebank Logistics Park. The facility will generate over 6,600 heavy vehicle trips and 10,000 light vehicle trips per day. The proposal to upgrade Cambridge Avenue is one of the road infrastructure improvements identified in the MITRA strategy, but progress has relied on grant funding for the business case, with the last community consultation reported completed three years ago. In the meantime, council has the responsibility for development assessment for planning proposal along the corridor.

Better alignment between the land use planning framework and the road network planning, as suggested in the Discussion paper, could help achieve greater certainty and timelier delivery of strategic infrastructure to optimise economic and social benefits.

4. A more operationally effective statute

A more operationally effective statute, which minimises costs on local councils is highly relevant to councils emerging growth areas which generally have fewer resources available to bear the costs of regulating the road network, as outlined in the Discussion Paper (page 50). Emerging growth area councils are located within designated growth areas but are still undergoing structure planning and significant development to transform them from rural to urban. These areas are often still referred to as Shires, such as Wollondilly Shire Council, rather than City Councils but they will accommodate much of the new housing delivery over the next twenty years.

Emerging growth areas typically have several structure-planned areas under construction at the same time and can have expansive development fronts. Common issues in these areas relate to connections to existing civil infrastructure such as water and sewer systems, upgrading rural roads to suburban standard roads, and the early provision of community infrastructure to support communities as they move in. These councils are particularly constrained by insufficient funding to deliver community infrastructure alongside new housing as these areas transition from rural to urban.

Simplifying notification practices

Cost savings can be achieved by simplifying and automating some statutory procedures for the management of local roads. For example, public activity notifications require newspaper publication and circulation. A suggested improvement would be to expand notification methods to include various electronic media to enhance public engagement and awareness.

Increase powers of local councils as roads authority

There are several improvements to the operation of the Act that could be made if local councils were empowered with greater authority. These improvements can help councils lower the cost of managing the network. For example, enabling councils to have the ability to manage service authority assets during road works and to recover maintenance costs related to necessary adjustments, and increase their power to impose larger penalties on road users conducting unauthorised activities on roads.

Case study Wollondilly Shire Council - an emerging growth area

Wollondilly Shire is located on the south-western outskirts of Sydney at the foothills of the Southern Highlands covering an area of 2,560 square kilometres. Home to 57,616 residents in 2023 its population is forecast to almost double within the next 20 years. Significant growth is planned adjacent to the main M1 Motorway heading south to Picton. Picton Road is a key State Road corridor from the Illawarra through Wilton Growth Area and Picton. There are multiple projects along the corridor that support upgrades linking the communities and the freight to the broader State via the Hume Highway.

Council has endorsed an indicative land use plan to guide future landowner, proponent or State Government initiated planning proposals to rezone land for future development within the South Wilton Precinct. Council is advocating with Transport for NSW and the Minister for Roads to enable employment lands to be fast tracked to ensure jobs closer to home for Wilton residents. Road widening is required to accommodate housing growth (15,000 Wilton in homes and 21,000 homes in Appin), and a new interchange (DDI) at the Hume and the Bypass is needed to allow new communities and existing residents to access jobs and safely leave the area in emergencies. These benefits also extend to Picton and surrounding towns

and villages that rely on Picton Road for emergency evacuation in flood and bushfire. These road upgrades support the National Freight Network and allows for the economic enhancement of Picton village removing the need for a substantial number of trucks to travel in the village.

An issue for council with the Act relates to service agreements between Transport for NSW and council. Currently these agreements are ambiguous about who is the authority regarding works within corridor ownership. An improvement to the Act would involve clearly defining responsibilities in service agreements to enhance collaboration between council and Transport for NSW.

Data availability and electronic monitoring

Finally, Transport for NSW can make greater use of new technologies and electronic data analysis to help councils plan, deliver and monitor their road network. More freely available data to assist councils in operating and maintaining their local road networks would greatly reduce costs of producing their required planning and reporting.



Creating resilient, liveable, thriving communities

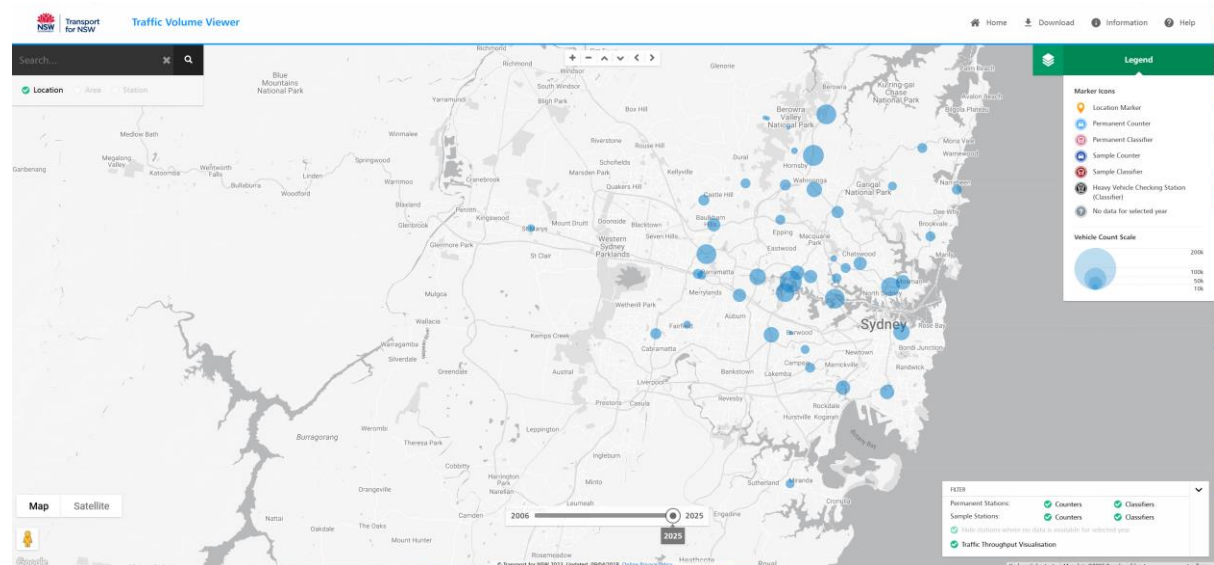
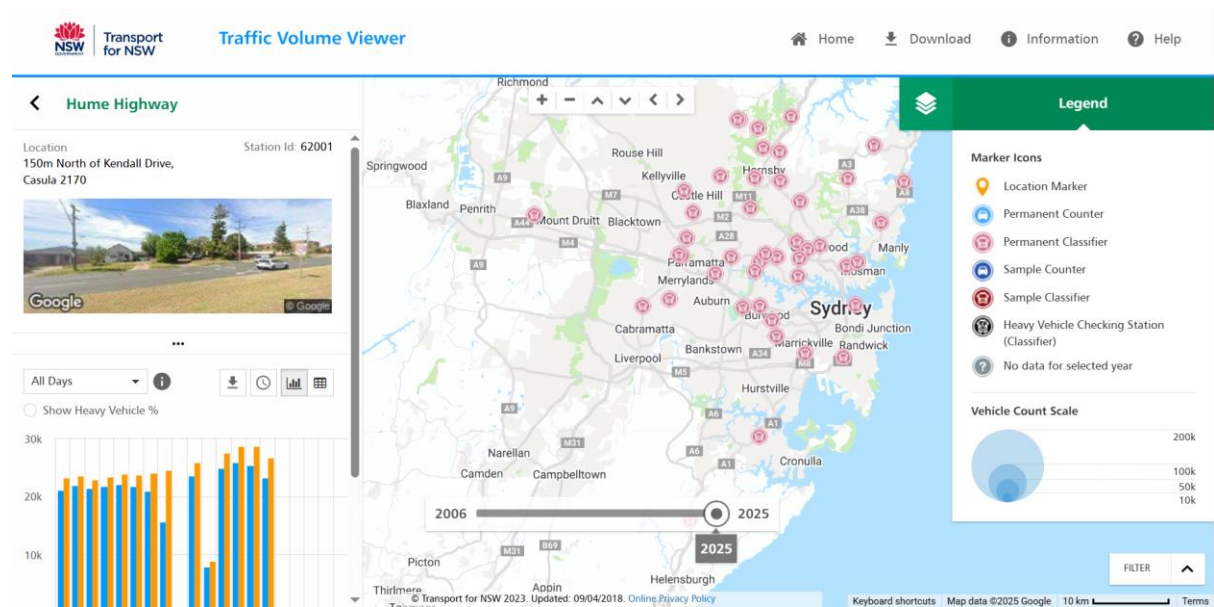
We proudly acknowledge Australia's First Nations peoples as the traditional custodians of the lands across Australia where we work and live. We honour Aboriginal and Torres Strait Islander communities and their rich culture and pay respect to Elders past, present and emerging.

Appendix 1 Road Network data examples

Traffic volume data availability is lower in growth areas

Camden Council is a growth area council that epitomises many of the issues raised in this submission. Information and data on traffic volumes, and the road, pedestrian and cycling networks are difficult to access for use by local government to monitor progress in their networks.

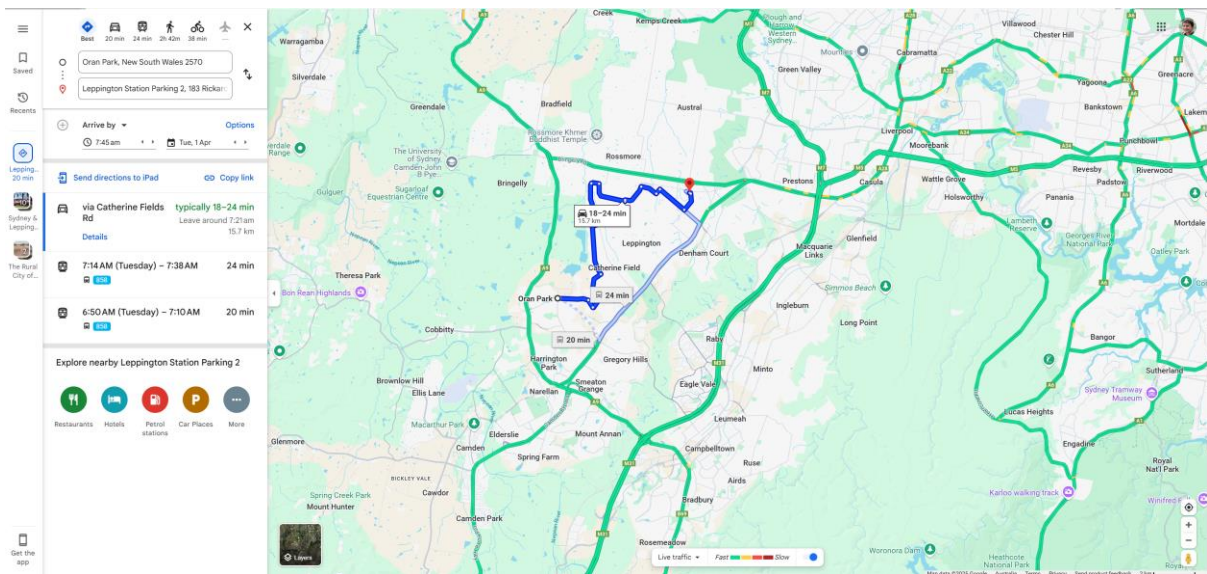
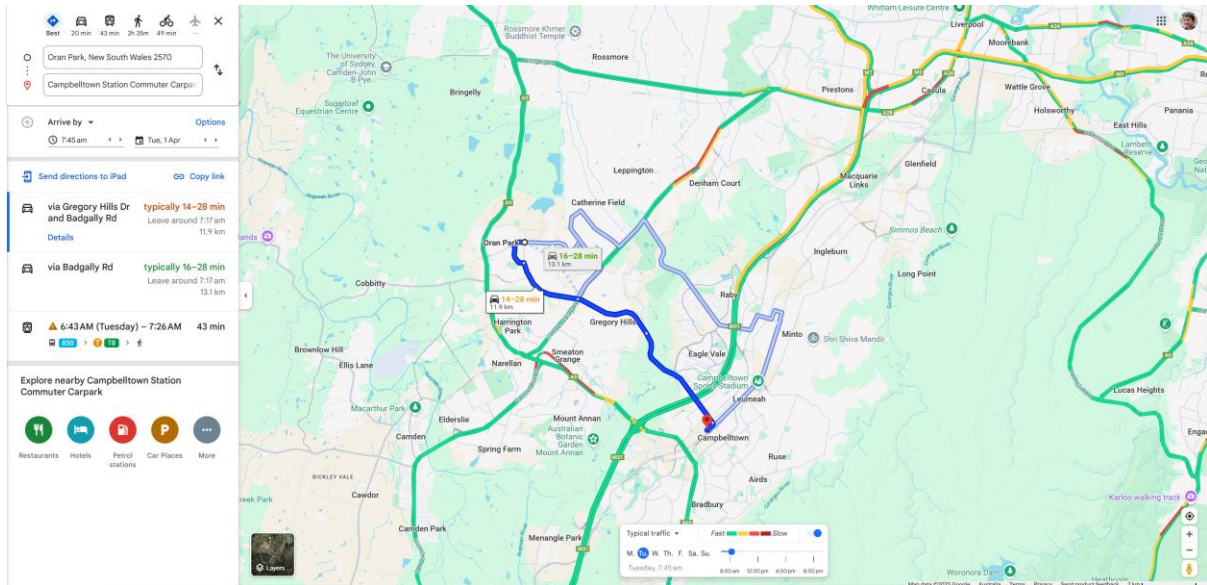
Traffic Volume Viewer has fewer counters and classifiers in Greater Sydney's western and south-western growth areas with implications for Council resourcing and monitoring the road network



Source: NSW Traffic Volume Viewer

Commuting times are greater in growth areas

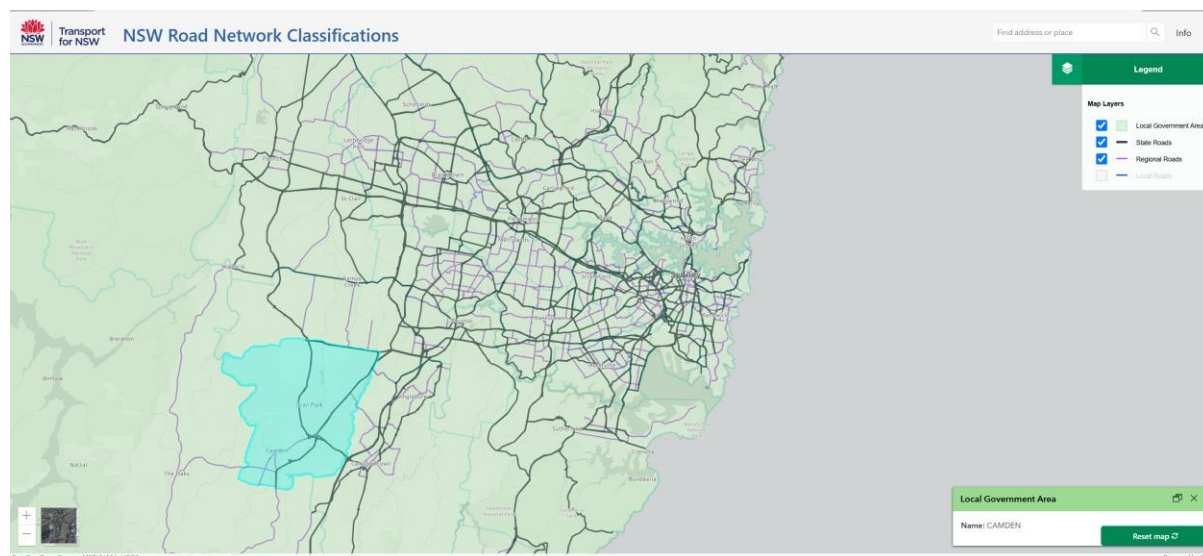
Access to public transport in Camden during morning peak can take up to 40 minutes by car to closest train stations: Campbelltown or Leppington.



Source: Google maps

The number of classified roads is fewer in growth areas

The number of classified roads in growth areas is lower than in established areas with implications for resourcing councils responsible for new greenfield and existing developments.



Camden Council is a comparable size to other more established councils in the middle ring region of Greater Sydney, such as Fairfield City Council and Canterbury-Bankstown City Council. However, as evident in the NSW Roads Classification map above, Camden has fewer classified roads which has resource implications for council in maintaining the network.

| Characteristics | Camden Council | Fairfield City Council | Canterbury-Bankstown City Council |
|---|---------------------|------------------------|-----------------------------------|
| Area* | 203 km ² | 102 km ² | 110 km ² |
| Estimated Population¹ (2023) | 134,811 | 209,742 | 379,829 |
| Projected Population to 2036¹ | 187,961 | 221,014 | 500,000 |
| Daily Traffic volumes (2025)² | No data available | 39,569 | 33,511 |
| Local Roads ³ (km) | 699 km | 612 km | 858 km |
| Number of Classified Roads - State roads⁴ | < 5 | >5 | >5 |
| Number of Classified Roads - State roads⁴ | <5 | >10 | >10 |

Source: 1. *id Informed decisions community profile for Local Government areas*

2. *NSW Traffic Volume Viewer*

3. *NSW Local Government Grants Commission Table of Local Roads and Bridges 2021-22*

4. *NSW Road Network Classification manual count.*