

To:

The Hon. Paul Scully, NSW Minister for Planning and Public Spaces
Attention: Mr Shaun Williams (Shaun.Williams@planning.nsw.gov.au)

CC:

NSW Department of Planning, Housing and Infrastructure
The Hon. John Graham, Minister for Roads, Minister for Music and the Night-time Economy

Dear Minister,

Submission: Mamre Road Data Centre Campus SSD-92743706

Reference is made to the State Significant Development Application (SSD- 92743706) for the proposed data centre campus at 706-752 Mamre Road, Kemps Creek. Thank you for accepting this late submission.

The NSW Freight Transport Advisory Council (FTAC) is a ministerial advisory council reporting to the Minister for Transport. The Council provides advice to the Minister for Transport on the coordination and multi-modal planning, regulation, development and operation of freight transport, infrastructure and network services across NSW.

The site at **706-752 Mamre Road** (the Site) is strategically located immediately adjacent to the future Western Sydney Freight Line and Intermodal Terminal at Mamre Road, Erskine Park and forms part of a precinct planned and protected for freight and logistics uses.

FTAC and its members **object to the proposal**.

FTAC submits that the proposal is incompatible with the intended function of the subject land and compromises the future productivity and sustainability of the State's freight logistics supply chain.

The proposal is inconsistent with the strategic planning framework, government policy direction and statutory controls that apply to the Mamre Road Precinct, including:

- Western Sydney Freight Line and Intermodal Terminal (IMT)
- Proposed status as State Significant industrial land
- Mamre Road Development Control Plan (2021)
- State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP)

The Site proposed for the data centre campus must be preserved for freight associated logistics use.

FTAC encourages the Department to refuse this development.

Western Sydney Freight Line and Intermodal Terminal (IMT)

The Mamre Road Precinct is located within the Western Sydney Employment Area and was rezoned in June 2020. The rezoning of the precinct preserves around 95 ha of land for environmental conservation and open space and protects a site for a potential Western Sydney freight intermodal terminal (IMT).

The Site is a key location adjacent to the future IMT that will form part of the industrial precinct.

The proposed development would permanently lock the land required to support the delivery and operation of this nationally significant freight infrastructure, noting The Site:

- represents 19% (52ha) of all land (268ha) with direct access to the IMT
- is closest to the IMT, making it a critical location for logistics activities
- is proposed to be co-located with the IMT via provision of the internal road connection

Delivering freight policy reform in New South Wales¹ report provides a roadmap for freight policy reform in NSW. It was adopted by the NSW Government in June 2025.

Direction for the NSW Government, relating to the Western Sydney Freight Line and development of IMT at Mamre Road Industrial Precinct, is outlined in action 52 of the report:

Action 52: Prioritise the necessary planning, business cases, funding and land acquisition to secure and commence development of the Western Sydney Freight Line and the Mamre Road Industrial Precinct before the end of the decade. Note that the IMT (which is expected to be a commercial operation in the future) is fundamentally linked to the Western Sydney Freight Line and planning, business case analysis and financing must recognise this interrelationship.

The Australian and NSW Governments have jointly funded the Full Business Case for Western Sydney Freight Line for Stage 1, which includes the Western Sydney Intermodal Terminal.

The Western Sydney Freight Line and Mamre Road precinct offer the best opportunity for reform and improvement for freight in the foreseeable future.

State Significant Industrial land

The proposed development is inconsistent with Statewide Policy for Industrial Lands.

The Mamre Road Precinct is classified as State Significant industrial land under the draft Statewide Policy for Industrial Lands.

Additionally, the surrounding area is also classified as Regionally Significant industrial land which aims to further support the state's initiatives in retaining industrial land for freight supply chains.

A data centre does not form part of national supply chains and is therefore inappropriate in the proposed location due to identified significance and classification of the land.

Mamre Road Development Control Plan (2021)

The *Mamre Road Development Control Plan (2021)* (Mamre Road DCP) provides the development controls for The Site. The proposal does not meet the Western Sydney Intermodal Terminal and Freight Network objectives and controls set out in 3.4.2 of the Mamre Road DCP, specifically:

- The Site is part of the 'dedicated freight network' as it is serviced by the proposed dedicated freight corridor.
- The proposal has not demonstrated how access to and from the dedicated freight corridor will be achieved as required under Control 5 of the Mamre Road DCP.
- The proposed Road 2 encroaches within the required 10m reserved freight corridor.

These impacts are unacceptable on proposed key freight infrastructure and could adversely impact the Western Sydney Intermodal Terminal's operations.

State Environmental Planning Policy (Industry and Employment) 2021 (Industry and Employment SEPP)

As identified in the Secretary's Environmental Assessment Requirements issued for the data centre campus development, Section 2.35 of *State Environmental Planning Policy (Industry and Employment) 2021* applies to the site.

The Section requires the concurrence of Transport for NSW who must take in to account the likely effect of the development on the following:

(a) the compatibility of the proposed development with the delivery of an integrated freight network, including use of fire access roads and connection to the fire access roads of adjoining land, and

(b) the operation of an integrated freight network, including whether the development is likely to impede access to or from the integrated freight network, and

(c) the practicability and cost of carrying out transport projects on the land in the future.

The proposed development is not compatible with the delivery or future operation of an integrated freight network. It removes vital land essential for the successful operation of the Western Sydney IMT and is likely to impede access.

FTAC encourages the consent authorities to preserve this essential and critical land for freight related uses to ensure protection of ample available co-located warehousing.

Through its protection, The Site will support the efficiency and productivity of the proposed Western Sydney IMT and deliver an interconnected freight and logistics supply chain for the people of New South Wales and its future generations.

FTAC would welcome the opportunity to meet with you directly about this important issue. Please contact the FTAC Secretariat to arrange such discussion.

Duncan Gay

Duncan Gay

Chair, NSW Freight Transport Advisory Council (FTAC)

April 2026

Supported by FTAC members:

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Rick Dani, General Manager Store Delivery Woolworths Group

Marika Calfas, CEO NSW Ports

Michael Gallacher, CEO Ports Australia

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Caroline Wilkie, CEO Australasian Railway Association

Alex Claassens, National Secretary Rail, Tram and Bus Union

Richard Olsen, NSW State Secretary, Transport Workers Union

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