

7 April 2026

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Minister for Planning and Public Spaces

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Attention: Mr S Williams

Submission on State Significant Development Mamre Road Data Centre Campus (SSD-92743706) at 706-752 Mamre Road, Kemps Creek

Dear Mr Williams,

NSW Ports is responsible for managing the port and freight assets of Port Botany, Port Kembla, the Cooks River Intermodal Terminal and the Enfield Intermodal Logistics Centre. These assets, along with the efficient movement of freight to and from these assets, are essential to the future economic growth, liveability, productivity and sustainability of New South Wales.

The proposal seeks approval for the construction and 24/7 operation of a large-scale data centre campus at 706–752 Mamre Road, Kemps Creek.

NSW Ports **objects to the proposal**. The subject land is strategically located immediately adjacent to the future Western Sydney (Mamre Road) Intermodal Terminal and forms part of a precinct specifically planned and protected for freight and logistics uses. The proposed development would permanently lock the land required to support the delivery and operation of this nationally significant freight infrastructure. The proposal is inconsistent with the strategic planning framework, government policy direction and statutory controls that apply to the Mamre Road Precinct.

NSW Ports submits that the proposal is incompatible with the intended function of the site and it compromises the State's freight logistics requirements, specifically the transport of containers to and from Port Botany by rail. NSW Ports encourages the Department to refuse this development.

Western Sydney (Mamre Road) Intermodal Terminal

Port Botany, the State's container port, has on-dock port rail at all three of its container terminals connected by dedicated freight rail line to Macarthur (56km). This freight line is unimpeded by passenger services through the Sydney metropolitan area and links intermodal terminals with Port Botany. This freight line forms part of a decade long strategy by the NSW Government to grow the volume of containers moved by rail.

Significant private sector investment continues to support of this strategy. At Port Botany, investment to grow the capacity of the on-dock rail terminals to handle 3 million Twenty-foot Equivalent Unit (TEU) per year is underway. The same capacity in the rail network and the metropolitan intermodal terminal network is required to sustainably grow rail transport of containers in line with a growing population. The Western Sydney Intermodal Terminal capacity forms part of this strategy.

In 2005, the Freight Infrastructure Advisory Board (FIAB) prepared the report *Railing Port Botany's Containers: Proposals to ease pressure on Sydney's roads*. This Report set the groundwork for intermodal strategy in Sydney. Recommendation 9 of that Report called for a future intermodal terminal to be developed in Western Sydney (nominally Eastern Creek) following the development of the Enfield Intermodal Terminal and Moorebank Intermodal Terminal. The Mamre Road Precinct (MRP) within the Western Sydney Employment Area (WSEA), was rezoned by the NSW Government in June 2020 with an objective to *"facilitate 850 hectares of industrial land with capacity for around 17,000 jobs, positioning the area as a world-class industrial precinct to meet Greater Sydney's long-term freight, logistics and industrial needs"*.

As part of that rezoning, an area for an intermodal terminal (known as the Western Sydney Intermodal Terminal) was reserved and protected, acting on the Recommendations of the 2005 FIAB Report. Recommendation 12 of the report stated that intermodal terminals should be located adjacent to or close to key distribution and warehousing areas in metropolitan Sydney.

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

In 2025, a Ministerial Independent Advisory Panel provided the below direction on the Western Sydney Intermodal Terminal:

"To increase capacity, the Panel recommends continuing the planning, funding and development of the Western Sydney Freight Line and the Mamre Road IMT and industrial precinct. The Panel's view is that the Western Sydney Freight Line and Mamre Road, Erskine Park industrial precinct offer the best opportunity for reform and improvement for freight in the foreseeable future"¹

The NSW Government has accepted the panel's full suite of recommendations and reforms are being implemented.

The site at **706-752 Mamre Road** is a key site in the freight network transport, adjacent to the future intermodal terminal. The site alongside the future intermodal terminal will form part of the industrial precinct aimed at supporting the freight network.

¹ K.Schott et.al. 2025. Delivering Freight Policy Reform in New South Wales. Page 7. Available at: <https://www.transport.nsw.gov.au/system/files/media/documents/2025/delivering-freight-policy-reform-in-nsw-june-2025.pdf>

Co-locating warehousing is essential to the cost-effective operation of any intermodal terminal. National Intermodal Corporation have stated that:

“It is important to achieve colocation of warehousing and distribution directly onsite at the intermodal terminal to maximise the benefits of the terminal itself and encourage the greatest modal shift to rail. Colocation of warehousing within the intermodal terminal also removes unnecessary additional movements, simplifying the supply chain and improving resilience”²

The Ministerial Independent Advisory Panel provided further direction by noting:

“NSW needs to support the co-location of freight and logistics facilities (e.g. distribution centres, terminals and warehouses) with railheads, removing the need for a road transport leg as part of the first or last movement. Moorebank IMT is a prime example of how this can be achieved and should be emulated when planning future terminals. Further work is needed to make this a reality for Mamre Road Industrial Precinct given the current land ownership around the chosen site.”³

The site must be preserved for freight associated logistics use. The site is one of few industrial sites with direct access to the proposed Western Sydney Intermodal Terminal (see hatched area below) and is proposed to co-locate the intermodal terminal via provision of the internal road connection (indicated on the figure below).

This site represents 19% (52ha) of all land (268ha) with direct access to the intermodal terminal. The site is at the centre of the intermodal precinct which would be most effectively used for logistics movements.

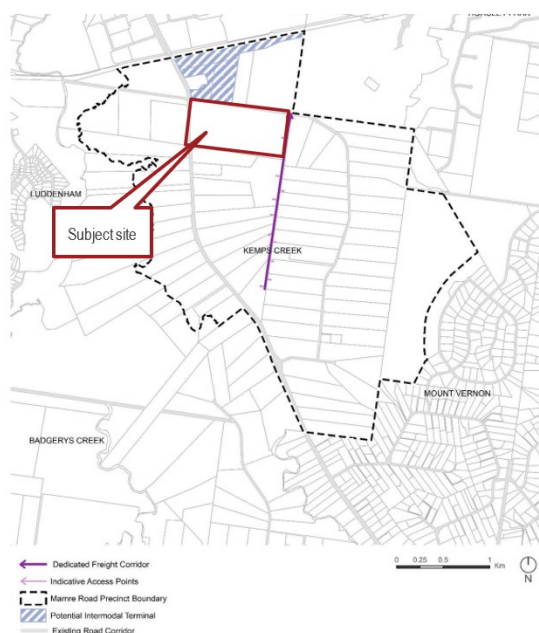


FIGURE 1 MAMRE ROAD INTERMODAL TERMINAL INCLUDING THE DEDICATED FREIGHT CORRIDOR

² National Intermodal Corporation Limited. 2025. Submission: NSW Freight Policy Reform Program, Page 4. Available at: <https://www.transport.nsw.gov.au/system/files/media/documents/2024/National-Intermodal-FPR-redacted-submission-30.pdf>

³ K.Schott et.al. 2025. Delivering Freight Policy Reform in New South Wales. Page 67. Available at: <https://www.transport.nsw.gov.au/system/files/media/documents/2025/delivering-freight-policy-reform-in-nsw-june-2025.pdf>

State Significant Industrial land

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. Statewide Policy for industrial lands prescribes State Significant industrial land as:

*“Areas that include or are directly linked to **critical state or nationally significant infrastructure** such as nationally significant airports, **ports, intermodals** and defence facilities. These areas are protected from incompatible land uses to give certainty around allowed activity that are **crucial to national and state supply chains**”⁴*

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

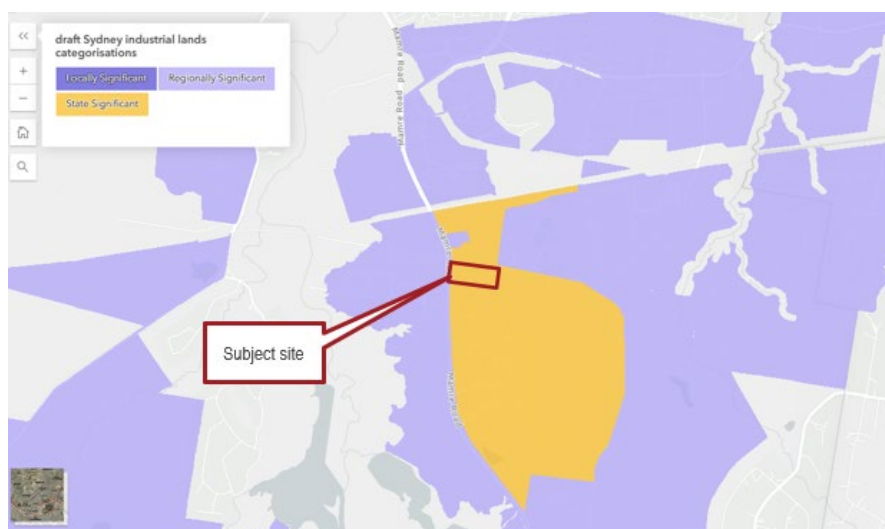


FIGURE 2 STATEWIDE INDUSTRIAL LAND POLICY LAND CATEGORISATION

Mamre Road Development Control Plan (2021)

The *Mamre Road Development Control Plan (2021)* (Mamre Road DCP) provides the development controls for the subject site. Section 3.4.2 is specifically regarding the Western Sydney Intermodal Terminal and Freight Network and provide the below Objectives:

- “(a) To facilitate the delivery of the Western Sydney Intermodal Terminal and dedicated freight network*
- (b) To facilitate dedicated freight access from the intermodal terminal to surrounding industrial precincts and individual warehouses/distribution centres*
- (c) To plan for a network of dedicated freight corridors to accommodate an automated guided vehicle (AGV) freight network*
- (d) To minimise freight vehicle impacts and interfaces with traffic on the public road network”*

⁴ NSW DPHI. 2025. Industrial Lands Action Plan. Pg 4. Available at: <https://www.planning.nsw.gov.au/sites/default/files/2025-01/industrial-lands-action-plan.pdf>

The proposal does not meet Objective 3.4.2 of the Mamre Road DCP. 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 which states:

"Development applications for lots with an identified access point (refer Figure 17) shall demonstrate how access to and from the dedicated freight corridor will be achieved"

Additionally, 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 project, 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 takes away vital land more suited for co-located warehousing which is necessary for the successful operation of an intermodal terminal.

In conclusion, we encourage the consent authorities to preserve this essential and critical land for freight and port related uses to ensure the efficiency of the proposed Western Sydney Intermodal Terminal and the Port's container supply chain. This land is a key part of the state freight network and will provide much needed co-located warehousing to support the Western Sydney Intermodal Terminal.

Should you wish to discuss this submission further please contact me on 0477 155 140 or at greg.walls@nswports.com.au.

Yours sincerely,



Greg Walls
General Manager Corporate Affairs and Planning

CC: Scott Greenow, Executive Director Freight, Transport for NSW