

Minister for Planning and Public Spaces
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

7 April 2026

Attention: Mr Shaun Williams

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

Dear Mr Williams,

The Australasian Railway Association (ARA) is the peak body for the rail sector in Australia and New Zealand and represents more than 240 member organisations across the industry, including rail freight operators, rail infrastructure managers, ports, terminal operators and other businesses in the freight supply chain. The ARA welcomes the opportunity to comment on the Mamre Road Data Centre Campus proposal currently on exhibition.

The ARA acknowledges the growing importance of digital infrastructure, and the role data centres play in the modern economy. However, the key issue in this case is not whether data centres are valuable. It is whether this particular 52-hectare site, immediately adjoining the future Western Sydney Intermodal Terminal and dedicated freight network, should be used for that purpose. In the ARA's view, it should not.

The ARA objects to the proposal and requests that it not be approved. The proposed campus, with power capacity of up to 1 gigawatt and six four-storey data centre buildings, would sterilise scarce, strategically located industrial land that is needed to support the future operation of the Western Sydney Freight Line, the Mamre Road intermodal terminal precinct and the broader Port Botany container supply chain. Although the scoping material refers to land allocation for a future freight transport corridor, that does not resolve the more fundamental land use conflict: the loss of terminal-adjacent land that should remain available for freight-enabling warehousing, distribution and logistics uses.

1. Inconsistent with NSW freight policy reform

The NSW Freight Policy Reform final report, accepted by the NSW Government in 2025, identifies the shortage of industrial land for freight purposes and the failure to identify and reserve future freight routes and sites as major structural barriers to freight reform. The report specifically highlights development of the Western Sydney Freight Line and an associated intermodal terminal at Mamre Road as short-term planning priorities, and later recommends that planning, business cases, funding and land acquisition be prioritised so that the Western Sydney Freight Line and the Mamre Road industrial precinct can be secured and commenced before the end of the decade.

The report also makes an important functional point: rail becomes more competitive when freight and logistics facilities are co-located with railheads, reducing the need for additional road legs in the freight chain. It expressly states that this model should be emulated for future terminals and notes that more work is needed to make that a reality for the Mamre Road Industrial Precinct. Approving a hyperscale data centre on one of the key adjoining sites would cut directly across that reform direction.

2. Inconsistent with the emerging industrial lands policy framework

The ARA has already submitted to the draft NSW Statewide Policy for Industrial Lands that industrial land within the functional catchments of rail freight corridors and intermodal terminals must be explicitly recognised and protected. The ARA's position is that well-located industrial land should be retained, fragmentation of large strategic parcels should be avoided, and there should be no net loss of industrial land in the Sydney region where freight demand is highest.

This proposal raises exactly those concerns. The Industrial Lands Action Plan and draft Statewide Policy for Industrial Lands establish a framework under which state significant industrial land includes areas directly linked to nationally significant infrastructure such as ports and intermodals and is to be protected from incompatible land uses. Mamre Road is precisely the kind of future-focused precinct that this framework is intended to safeguard. Approving a non-freight, land-intensive use on this site would undermine that policy direction at the point it matters most.

3. Inconsistent with the Mamre Road Precinct planning controls

The Mamre Road Precinct Development Control Plan 2021 is clear that this precinct is to function as a world-class industrial area centred on warehousing, logistics and a future intermodal terminal serviced by the Western Sydney Freight Line and a dedicated freight road network. Section 3.4.2 of the DCP requires development to facilitate the delivery of the Western Sydney Intermodal Terminal and dedicated freight network, facilitate freight access from the terminal to surrounding industrial precincts and warehouses, and plan for dedicated freight corridors and an automated guided vehicle network.

Those controls are not incidental. They go to the core intended function of the precinct. The DCP requires development adjacent to the dedicated freight corridor to make provision for that corridor, maintain a minimum corridor width and demonstrate how access to and from the corridor will be achieved. In addition, section 2.35 of the State Environmental Planning Policy (Industry and Employment) 2021 requires Transport for NSW concurrence for relevant development in the Mamre Road Precinct and requires consideration of whether the proposal is compatible with the delivery and operation of an integrated freight network and with future transport projects on the land. The Department should apply those provisions rigorously in this case.

Importantly, the proponent's own scoping report recognises that the Mamre Road Precinct is intended to accommodate an intermodal terminal serviced by the planned Western Sydney Freight Line and a dedicated freight road network situated along the eastern boundary of the site. In other words, the strategic freight function of the land is not speculative; it is embedded in the proposal material itself.

4. Freight productivity and supply chain consequences

From a freight perspective, the consequence of approving the proposal is straightforward. It would reduce the availability of large, terminal-adjacent industrial land needed for rail-served warehousing, container logistics and distribution uses. That would lengthen first-mile and last-mile truck movements, increase congestion and emissions, reduce rail's cost competitiveness, and weaken the value of major public and private investment already being directed toward Port Botany rail capacity, the Western Sydney Freight Line and future intermodal capacity in western Sydney.

Once land of this scale and location is committed to a non-freight use, it is extraordinarily difficult to recover. For that reason, the test should not be whether a data centre can technically fit on industrial land. The test should be whether approval would compromise the long-term freight function of a state-significant precinct. In the ARA's view, it plainly would.

Conclusion

For these reasons, the ARA requests that the proposal be refused. At a minimum, development consent should not be granted unless the proponent can demonstrate, to the satisfaction of the Department and Transport for NSW, that the development will not sterilise land needed for co-located freight and logistics uses, impede delivery of the dedicated freight network, or undermine the development of the Western Sydney Freight Line and Mamre Road intermodal terminal precinct.

The ARA would welcome continued engagement on this matter. Should you wish to discuss this submission further, please contact me at rchivers@ara.net.au or 0478 683 843.

Yours sincerely,

Roz Chivers
General Manager, Rail Freight and Heavy Haul
Australasian Railway Association