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18 September 2023

Dear Mr Auster,

Re: State Significant Development Application (SSD-51147710) – 270-286 Horsley Road, Milperra Multi-Level Warehouse – 270-286 Horsley Road, Milperra (Lot 3 DP 734460 and Lot A DP 327986)

Thank you for providing NSW Ports with the opportunity to comment on SSD-51147710 for a State Significant Development Application (SSDA) for the construction and operation of a multi-level warehouse and distribution centre at 270-286 Horsley Road, Milperra (Lot 3 DP 734460 and Lot A DP 327986). 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 (ILC). These assets, along with the efficient movement of freight to and from these assets, are critical to the future economic growth, liveability, productivity and sustainability of New South Wales.

On 13 September 2023, NSW Ports received an exhibition notice from the NSW Department of Planning and Environment for the abovementioned SSDA. The SSDA was prepared and lodged by Ethos Urban Pty Ltd on behalf of ESR Developments (Australia) Pty Ltd (ESR Developments). It is noted that ESR Developments is a stakeholder in the NSW freight network, being the owner of numerous under construction and operational warehouse and distribution centres in Western Sydney. These freight assets are of key strategic importance to NSW and our supply chains.

NSW Ports has reviewed the documentation submitted with the SSDA and is supportive of the proposal. NSW Ports has also assessed the strategic intent of multi-level warehouses (such as the proposed). NSW Ports' is supportive of development and redevelopment of industrial land across Greater Sydney, such as multi-level warehouses, infill development and other developments that increase the efficiency of existing industrial assets. NSW Ports is therefore supportive of the proposed SSDA.

The Importance of Industrial Lands to Greater Sydney's Future

The freight and logistics supply chain requires well-located, large parcels of land for warehouses, depots and logistics activities. Sufficient supply of well located and productive industrial land in Greater Sydney will reduce the cost of moving freight and increase efficiency and productivity while minimising traffic, emissions and amenity impacts. The subject site's proximity to the M5 motorway makes it land of strategic value to the broader supply chain.

By 2063, NSW will be home to around 12 million people¹. As a result of this projected population growth, consumer demand will intensify; increasingly catalysed by Australia's limited domestic manufacturing capabilities, low industrial space vacancies (0.1% in Q4 2022²), rezoning pressures and minimal new land supply. A result of these factors is that percentage of goods imported will likely remain at or above current levels and there will be a greater need for cost-effective last-mile delivery in urban areas (such as Greater Sydney)³. Due to these factors, it has been widely established that there is an ever-increasing need for the delivery of new industrial land in Sydney.

Additionally, it is noted that around 90% of import containers are delivered within a 50km radius of Port Botany. Accounting for this, the site is located approximately 18km from the Port Botany Precinct and is 12.3km from the Enfield Intermodal Logistics Centre and

¹ Population Projections Data 2021, with linear projections 2041-63 prepared by NSW Department of Planning and Environment (2021)

² Eastern Seaboard Industrial Vacancy Study – Q4 2022 prepared by Urbis (2022)

³ Future of Freight for Sydney's Trade Gateways – Managing Industrial Land Zoning in the vicinity of Port Botany and Sydney Airport prepared by L.E.K (2021)

is therefore well poised to assist in meeting the growing NSW freight task. Moreover, infill industrial development such as multi-level warehouses (such as the proposed) will uplift the industrial zoned/developed land in Greater Sydney, where industrial land is scarce and demand for instant and last mile delivery facilities is increasing (a mere 8% of land in Greater Sydney is zoned for industrial uses)⁴.

A total of approximately 351,026 sqm of multi-storey floorspace is forecast to be delivered between 2022 and 2026 in Sydney⁵. Developments such as the proposed are located proximate to the Port Botany and Enfield ILC precincts and provide an uplift of floorspace for all nearby port operators and stakeholders. The delivery of such floorspace would be otherwise unachievable without the advancement of multi-level warehouses in NSW. The approval and operation of the proposed Horsley Road multi-level warehouse will therefore be essential in meeting this forecast and ultimately the demands of this growing freight task.

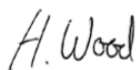
Facilitating an Efficient Supply Chain

During the determination of this project, NSW Ports urges the Department to ensure any approvals do not impose curfews and caps on the activity, other than by justified exceptions, to make the most efficient use of scarce industrial lands and existing infrastructure proximate to the Port and Enfield ILC.

Accounting for the above, it is critical that new and enhanced industrial developments (such as the proposed) continue to be delivered in the Greater Sydney region. Long term strategic planning from all stakeholders will also be required to stop further erosion of large parcels of industrial land around Port Botany and the Enfield Intermodal Logistics Centre. NSW Ports' is supportive of the strategic intent and objectives of the proposed SSDA.

If you have any questions, please contact me on 9316 1130 or at Hamish.Wood@nswports.com.au.

Yours sincerely,



Hamish Wood
Planning Officer

⁴ NSW Ports 2063 Our 40-Year Master Plan for Sustainable Growth prepared by NSW Ports (2023)

⁵ Future Cities - The Rise of Multi-Storey Warehousing prepared by CBRE (2022)