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

19 March 2025

Dear Mr Bertwistle

## **Re: State Significant Development Application (SSD-65924461): Stephen Road Multi-level Warehouse 49-61 Stephen Road, Banksmeadow.**

Thank you for the opportunity to comment on State Significant Development Application (SSD-65924461) for a multi-level warehouse and distribution centre at 49-61 Stephen Road, Banksmeadow (Lot A DP190526, Lot 1 DP1095110, Lot 1 DP311767).

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.

NSW Ports have reviewed the documentation submitted with the application and support the proposed multi-level warehouse on 49-61 Stephen Road, Banksmeadow.

The proposal is supported as it proposes a large industrial allotment and is well positioned to serve the State's freight network.

### **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.

Our 40-year Master Plan outlines priorities and actions required to cater for trade growth and diversification needs of the people and businesses of New South Wales. An identified key action of the Master Plan is to: *"retain industrial land in Greater Sydney and the Illawarra and expand land supply, particularly in Western Sydney, to meet the growing freight task"*<sup>1</sup>.

By 2041, NSW will be home to over 10 million people<sup>2</sup>. 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 (2.1% in 2H24), rezoning pressures and minimal new land supply.

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<sup>1</sup> CBRE Research: *Australia's Industrial and Logistics Vacancy Second Half 2024 (2H24)*; December 2024

<sup>2</sup> Population Projections Data prepared by NSW Department of Planning, Housing and Infrastructure; updated November 2024

The 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<sup>3</sup>. Due to these factors, it has been widely established that there is an ever-increasing need for the delivery of new industrial land in Greater Sydney.

Currently, only 8% of land in Greater Sydney is zoned for industrial uses. Existing industrial land supply is expected to be exhausted by around 2040. Therefore, it is crucial that land use policy makes the provision for additional, well serviced, industrial land zones. Over 90% of import containers are delivered within 50km of Port Botany. There has been an increase in containers heading further west, with a 179% increase in containers destined for the 40-50km zone from Port Kembla between 2014-2022.

The site is located 2.1km from Port Botany therefore it is well positioned to assist in meeting the growing NSW freight task. The proximity of the site to Port Botany could open up opportunities for uses which assist in freight requirements of the state. Additionally, there has also been an identified need for an uplift of existing industrial gross floor areas via multi-level warehouses near port facilities. This application responds well to the need for industrial land and will allow for uses which may contribute to port activities.

#### **Further considerations**

During the determination of this project, NSW Ports urges the Department to ensure any approvals do not impose curfews and caps on the activity to make the most efficient use of industrial lands and existing infrastructure close to the Port.

NSW Ports welcomes the opportunity to further assist in informing the Department on this application.

If you have any questions, please contact me on 02 4275 0726 or [planning@nswports.com.au](mailto:planning@nswports.com.au).

Yours sincerely,

Josephine Maejiirs  
**Planning Officer**

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<sup>3</sup> 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)