Dear Sir / Madam,

Re: Draft Western Sydney Aerotropolis Plan

Thank you for providing NSW Ports with the opportunity to comment on the draft Western Sydney Aerotropolis Plan (WSAP). 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. At NSW Ports, our focus is managing the key trade gateways connecting the people and businesses of NSW and Australia to global markets.

NSW Ports supports the vision identified for the Western Sydney Aerotropolis (WSA) and the need to optimise freight infrastructure and connections, including corridors that will assist in meeting the long-term freight task of Sydney in line with forecast population growth. NSW Ports has long advocated for the identification and protection of strategically vital freight corridors in Western Sydney.

NSW Ports provides the below specific comments on the exhibited draft WSAP documentation and the planning requirements for freight infrastructure, long term corridor management and freight infrastructure protection.

Draft Western Sydney Aerotropolis Plan

Western Sydney Freight Corridors

To support the proposed vision for the WSA efficient freight connections need to be established which connect the Aerotropolis with port and freight assets. Proposed road and rail transport corridors traverse the WSA and are fundamental to assist in meeting the long-term freight task of the forecast population growth of Western Sydney.

Western Sydney Freight Line

NSW Ports supports the Western Sydney Freight Line project and the need for this corridor in order to service the growing freight needs of Western Sydney prior to the development of the WSA. NSW Ports has consistently advocated for this freight corridor in conjunction with a Western Sydney intermodal terminal in order to increase the rail mode share of containers from Port Botany.

When planning the Western Sydney Freight Line, it is vital that this corridor include a connection to the Southern Sydney Freight Line around Villawood / Leightonfield and as such, Transport for NSW (TfNSW) must prioritise the identification and protection of the eastern section of this corridor. This section and connection is vital for the viability of the Western Sydney Freight Line and the Outer Sydney Orbital in servicing the growing freight task of Sydney.

Outer Sydney Orbital

NSW Ports supports the Outer Sydney Orbital project and the need to protect this vital corridor for the purposes of both road and rail freight infrastructure.

Sydney and NSW will need a second container port in the future and long term strategic planning has identified Port Kembla as servicing this need. The investment committed to Western Sydney including the development of the Aerotropolis in the south-west, positions the region as one of growth for the next twenty years. This further strengthens the role that Port Kembla will play in servicing the freight task of Sydney and NSW. The Outer Sydney Orbital, combined with a further link to the Illawarra (i.e. through the Maldon-Dombarton rail line) will be vital in supplying the freight needs of Western Sydney in to the future. NSW Ports is of the view that the corridor is appropriately located in relation to the growth areas of Western Sydney, the proposed Western Sydney Freight Line, future intermodal developments, and the Western Sydney Airport.
Further, the final alignment of these freight corridors should be finalised and the protection of these freight corridors is vital. Planning instruments should identify these corridors to ensure the protection of them from urban encroachment that could potentially restrict the future operation of the freight corridors.

Western Sydney freight rail corridors need to be operational to allow the transfer of freight to and from Western Sydney to meet the needs of the Aerotropolis population and increase the rail freight modal share.

**Mamre Road Precinct**

NSW Ports supports the proposed initial vision and land uses for the Mamre Road Precinct. However, strategic outcomes need to be determined for a new Western Sydney Intermodal Terminal. NSW Ports strongly supports the formal allocation of land for the purposes of an intermodal terminal. The development of a Western Sydney Intermodal Terminal has long been identified through strategic planning and will form a vital part of the freight network. Further, supporting land for industrial purposes, and in particular freight and logistics, is crucial to supporting the predicted population growth in Western Sydney.

It is noted that the Department of Planning, Industry and Environment is responsible for the planning of the Mamre Road Precinct. NSW Ports provided a submission on the Draft Mamre Road Structure Plan exhibited in December 2019.

**Western Sydney Aerotropolis Discussion Paper on the Proposed State Environmental Planning Policy (SEPP Discussion Paper)**

NSW Ports supports the intent of the proposed Aerotropolis SEPP to provide preliminary development controls for the WSA.

The SEPP discussion paper states that the planning for transport corridors required for road and rail infrastructure to support the new WSA city, consistent with Future Transport 2056, is underway. NSW Ports supports the Western Sydney Freight Line project and the Outer Sydney Orbital and the need to protect this vital corridor in order to service the growing freight needs of Western Sydney prior to the development of the WSA.

NSW Ports advocates for the protection of these vital freight corridors through their identification and zoning in environmental planning instruments. The alignment of these future corridors should be identified and zoned SP2 Infrastructure in the proposed Aerotropolis SEPP. The WSA Structure Plan exhibited identifies the proposed Outer Sydney Orbital transport corridor (grey) and the potential Western Sydney Freight Line Corridor (blue). Given these proposed and potential corridors are identified in the Structure Plan, they should also be zoned and protected within the proposed Aerotropolis SEPP.
Ideally, these freight corridors would also be identified and protected from encroachment through the application of Clauses 87 and 102 of *State Environmental Planning Policy (Infrastructure) 2007*.

It is noted that the Mamre Road Precinct will be zoned under *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (WSEA SEPP).

**Draft Western Sydney Aerotropolis Development Control Plan (DCP) Phase 1**

**Noise and Vibration**

The Western Sydney Aerotropolis Structure Plan includes proposed road and rail transport corridors traversing the WSA. NSW Ports seeks to ensure that the Western Sydney Aerotropolis DCP assists in the planning, design and assessment of development located within the vicinity of freight corridors.

New development should be designed and constructed to mitigate future impacts resulting from freight road and rail corridors within the vicinity of the site. The DCP should stipulate requirements for new development located within the proximity of future road and rail corridors to assess the future acoustic environment once the corridors are operational. This will ensure that new development is constructed to a level which can appropriately mitigate acoustic impacts from future transport corridors.

Should you wish to discuss this submission further, please contact me on [contact information removed].

Yours sincerely,

Adriane Whiley
Planning Officer