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Dear Ms Lees,

**Re: NSW Ports Submission on the Draft Illawarra Shoalhaven Regional Plan 2041**

Thank you for providing NSW Ports with the opportunity to comment on the Draft Illawarra Shoalhaven Regional Plan 2041 (the draft Plan). NSW Ports is responsible for managing the port and freight assets of Port Kembla, Port Botany, 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 critical to the future economic growth, liveability, productivity and sustainability of New South Wales.

NSW Ports supports the draft Plan and the need for a long-term strategic framework for the Region. Objective 3 to grow the Port of Port Kembla is supported by stakeholders across the Illawarra-Shoalhaven and will lead to a productive and innovative region.

NSW Ports provides the below specific comments on the draft Plan.

Reference	Comment
<i>Objective 3: Grow the Port of Port Kembla as an international trade hub</i>	<p>NSW Ports supports the inclusion of this Objective. As a precinct that heavily contributes to the regional and State economies, the growth of the Port of Port Kembla directly benefits the Illawarra-Shoalhaven.</p> <p>Port Kembla is an international trade gateway for bulk agricultural, construction and mining industries. It is New South Wales' largest motor vehicle import hub and home to the state's largest grain export terminal and second largest coal export port.</p> <p>Port Kembla has been approved by the NSW Government as the site of New South Wales' next container terminal once Port Botany nears capacity. Its proximity and access to Sydney's west and south west means Port Kembla is well positioned to handle the expected growth in freight volumes.</p>

Reference	Comment
<p><i>Strategy 3.1</i>  <i>“...considering the suitability of high traffic generating developments, such as large scale retail and high density residential, on roads that service the Port to reduce conflicts with dangerous goods vehicles.”</i></p>	<p><b>Recommendation:</b> NSW Ports recommends amending the last part of this Strategy to “conflicts with <i>heavy</i> vehicles” rather than specifically dangerous goods vehicles, as the broader impacts of the interactions between heavy and light vehicles should be considered on these key routes.</p>
<p><i>Objective 4: Activate regionally significant employment precincts to support new and innovative economic enterprises</i></p> <p><i>Strategy 4.1</i>  <i>Support new and innovative economic enterprises in local strategic planning and local plans by:</i></p> <ul style="list-style-type: none"> <li>• <i>retaining and managing regionally significant employment lands and safeguarding them from competing pressures</i></li> <li>• <i>providing flexibility in local planning controls</i></li> <li>• <i>aligning infrastructure to support the rollout of employment land in the region.</i></li> </ul>	<p>NSW Ports strongly supports Strategy 4.1, and particularly the first element. For the Illawarra-Shoalhaven to remain competitive and productive, industrial lands need to be retained and protected.</p> <p>In Sydney, competing land uses and weaknesses in strategic protection of industrial lands over decades have resulted in a distorted industrial land supply with most lands now located in Western Sydney. This results in productivity difficulties for last mile deliveries as well as transport impacts as vehicle kilometres have increased for goods.</p> <p><b>Recommendation:</b> NSW Ports recommends that the strategy includes measures for ensuring industrial lands in areas where they serve a freight and logistics purpose are not fragmented through subdivision to sizes less than 2ha which can affect the overall value of the lands in supporting the growth of the Port of Port Kembla.</p>

Reference	Comment
<p><i>Objective 27: Protect major freight networks</i></p> <p><i>Strategy 27.1</i>  <i>Optimise the efficiency and effectiveness of the freight handling and logistics network in local strategic planning and local plans by:</i></p> <ul style="list-style-type: none"> <li><i>protecting, maintaining and improving the existing and emerging freight transport network</i></li> <li><i>balancing the need to minimise negative impacts of freight movements on urban amenity with the need to support efficient freight movements and deliveries</i></li> <li><i>limiting incompatible uses in areas expected to have intense freight activity.</i></li> </ul>	<p>NSW Ports supports the Objective to protect existing and future freight networks that service the Port of Port Kembla and the Illawarra-Shoalhaven more broadly.</p> <p><b>Recommendation:</b> NSW Ports believes this Strategy could be strengthened by recommending the inclusion of the Maldon-Dombarton rail corridor within <i>State Environmental Planning Policy (Major Infrastructure Corridors) 2020</i>.</p> <p>The aims of that SEPP are:</p> <p>(a) <i>to identify land that is intended to be used in the future as an infrastructure corridor,</i>  (b) <i>to establish appropriate planning controls for the land for the following purposes—</i></p> <p style="padding-left: 40px;">(i) <i>to allow the ongoing use and development of the land until it is needed for the future infrastructure corridor,</i>  (ii) <i>to protect the land from development that would adversely impact on or prevent the land from being used as an infrastructure corridor in the future.</i></p> <p>Including the Maldon-Dombarton rail corridor within that policy would complete the land zoning process and would protect the land from development that would potentially impact on the construction or operation of a future freight rail line.</p>

We also note the alignment of the draft Plan to the Illawarra Shoalhaven City Deal which has been launched recently, however have identified that some aspects of this proposal have not been outlined more clearly in the Regional Plan and encourage DPIE to continue engaging with RDA Illawarra and the wider City Deal Collaborative Group to ensure that priorities are aligned to support and deliver the strategic vision for the Illawarra Shoalhaven region.

NSW Ports thanks the Department of Planning, Industry and Environment on their collaboration to date on the draft Plan. Should you wish to discuss this submission further, please do not hesitate to contact me on 9316 1131 or at [greg.walls@nswports.com.au](mailto:greg.walls@nswports.com.au).

Yours sincerely,



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