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**Q1**

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**Q2**

Submissions may be made public (including full name, organisation name and postcode only). You can choose to publish your submission anonymously (using your postcode only). Please select from the options below:

**My submission can be made public (with my full name, organisation name and postcode published)**

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**Q3**

What has been your experience with the retain and manage industrial lands policy?

**Respondent skipped this question**

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**Q4**

What has been your experience with the review and manage industrial lands policy?

**Respondent skipped this question**

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**Q5**

What suggestions would you make for industrial lands policy in the Greater Sydney Region Plan?

**Respondent skipped this question**

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**Q6**

Are there any barriers to industrial lands fulfilling their functions?

**Respondent skipped this question**

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**Q7**

Respondent skipped this question

From your perspective, what would be the most productive way to manage industrial lands? What are the opportunities to make industrial areas more productive?

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**Q8**

Respondent skipped this question

Are there particular locations in Greater Sydney that are most appropriate to transition to alternative uses for industrial lands? Why?

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**Q9**

Respondent skipped this question

Are you aware of any new types of industrial or urban services uses occurring in industrial areas?

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**Q10**

Respondent skipped this question

Please provide any further comments below

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**Q11**

Would you like to attach a document?

**20210818 ARTC GSC Land Preservation Submission.pdf (135.8KB)**

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18 August 2021

Greater Sydney Commission  
Industrial Lands Policy Review

By website: [Industrial Lands Policy Review | Greater Sydney Commission](#)

Dear Greater Sydney Commission,

**Re: Consultation on Industrial Lands Policy Review**

Thank you for the opportunity to comment on the Industrial Lands Policy Review

The Australian Rail Track Corporation provides critical infrastructure for the efficient operation of the Australian freight and logistics supply chain; including the critical rail link to Port Botany and the Southern Sydney Freight Line.

ARTC's experience with the construction of significant infrastructure projects, and the importance of land preservation, provides it with valuable insights into the process being undertaken by the Greater Sydney Commission (GSC). The importance of land preservation is heightened by the need to develop new, modern integrated infrastructure across the supply to maximize its efficiency and meet the needs of modern supply chains.

Australia's freight task in and out of Sydney is already significant and is forecast to more than double over the next 40 years with import/export volumes expected to increase by circa 4% pa over that period. Supply chain infrastructure needs will therefore expand over time; with investment staged to reflect the most efficient use of capital and infrastructure. However, this staged expansion is critically dependent on the access to the necessary land to develop the infrastructure as required. That is, the need for that future investment is clear and therefore preservation of that land, and its permitted use, is essential to ensure that the infrastructure will be delivered at the time it is required.

Reductions in access to the land requirements to deliver these long-term freight strategies to meet the growing freight task needs of the NSW population will therefore impose significant costs of the population and efficiency of the NSW economy. Historically Sydney has seen a significant reduction in industrial lands due to rezoning for residential and commercial uses. This has reduced land access for freight and logistic operations close to Port and increased prices for that remaining land, whilst imposing greater operational restrictions and costs (including increased congestion). Changes to the existing policy of "Retain and Manage" industrial lands to permit more flexible use or permit rezoning will therefore impose further costs and inefficiencies on the long-term freight task for NSW.

Ensuring the on-going separation of industrial lands from residential uses is an essential aspect of this policy as it avoids future land-use conflicts which inevitably result in operating restrictions and curfews that drive up the costs, and reduce the efficiency, of the freight

supply chain in NSW. This in turn acts as a constraint on the development of the NSW economy, ensuring future generations wear the costs of actions now.

Part of the NSW Government's policy is to increase the share of rail deliveries into Port Botany to 28%; success in which delivers substantial savings to the NSW economy through the reduction in the significant externalities caused by heavy truck usage in the vicinity of Port Botany. In particular, this will reduce congestion on the roads, reduce particulate and greenhouse gas emissions and reduce the number of accidents on the road. Success in meeting this target relies on the development of appropriate supply chain infrastructure, including rail terminals and freight distribution centres. This in turn requires access to land. Restrictions on this land access in the long term will therefore not only impose direct supply chain costs on the NSW economy, but will result in a less sustainable, less safe and more congested environment for the people of NSW.

Appropriate, and unfettered access to the industrial land to allow the development of the required infrastructure to deliver the efficient and staged growth of the supply chain will ensure that the forecast increased freight task can be facilitated based on appropriately staged investment. This in turn ensures that the growth potential of the NSW economy is maximized into the long term; driving business and employment growth across the state with minimal externalities imposed on the NSW economy and population. Finally, limiting the negative impact of flexible land use policies will ensure that the productive use of lands is maximized avoiding the added supply chain costs to freight which would otherwise be borne by consumers.

The protection of Industrial Land from re-zoning and other non-industrial uses will therefore ensure:

- the cost of goods to the NSW population will be lower than they otherwise would be;
- freight deliveries are faster (a critical issue with the rise of e-commerce) than the otherwise would be; and
- the NSW population enjoys a safer and less congested road network with lower emissions due to the most efficient operation of the freight supply chain network.

ARTC therefore considers the protection and preservation of industrial lands in Sydney to be fundamental to the future operating capability of the freight supply chain in which it operates. If you have any questions in respect of this submission, please do not hesitate to contact me by phone on 0438 400 250 or by email on [jteubner@artc.com.au](mailto:jteubner@artc.com.au).

Yours sincerely



Jonathan Teubner  
**Manager Economic Regulatory Development**