Planning Proposal – 251, 278 and 280–282 Captain Cook Drive, Kurnell

A Submission to the NSW Department of Planning, Housing and Infrastructure

Monday, 11th May 2026

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1. Introduction and Statutory Context

The Australian Logistics Council (ALC) welcomes the opportunity to provide a submission in relation to the planning proposal for land at 251, 278 and 280–282 Captain Cook Drive, Kurnell (the Proposal).

ALC is the peak national industry body representing Australia's major freight, logistics and supply chain operators, including road and freight rail operators, airports, ports, stevedores, intermodal terminals, warehousing and distribution providers, major retailers, fuel and energy suppliers, infrastructure investors and logistics technology providers. All ALC members operate and invest in nationally significant supply chain infrastructure that underpins Australia's productivity, trade competitiveness, energy security and economic resilience.

This submission is made in the context of the *Environmental Planning and Assessment Act 1979* [1](NSW) (EP&A Act), particularly the statutory requirements to promote ecologically sustainable development (ESD), ensure the orderly and economic use and development of land, and give proper consideration to the public interest. These principles require that planning decisions extend beyond

[1] https://legislation.nsw.gov.au/view/html/inforce/current/act-1979-203

site-specific land use change and assess the cumulative and system-wide impacts on critical infrastructure, long-term productivity, and the efficient functioning of metropolitan economies.

2. Strategic Multi-Modal Infrastructure Context (Freight + Aviation Interface System)

The Kurnell Peninsula[2] forms part of one of the most strategically significant industrial and trade precincts in New South Wales. It sits within the southern Sydney freight and logistics corridor, functionally integrated with Port Botany, fuel and energy infrastructure, industrial employment lands, intermodal freight systems, and key arterial road freight routes servicing Greater Sydney. This corridor operates within a broader aviation operational environment associated with a major international gateway, including established flight path structures servicing primary runway operations and high-frequency aircraft movement corridors. This creates a dual-interface constraint system in which freight, industrial and aviation infrastructure operate in close spatial proximity and perform interdependent functions that are not readily substitutable within the metropolitan economy. The system supports import and export logistics, fuel security supply chains, construction materials distribution, waste and recycling logistics, maritime support services, and large-scale industrial processing, while also operating beneath high-frequency aircraft movements servicing domestic, international and freight aviation demand. Sydney Airport and its surrounding precinct constitute a nationally significant economic asset, supporting approximately 354,800 full-time equivalent jobs and generating $45.0 billion in economic activity annually, with forecasts increasing to approximately 560,000 jobs and $70.6 billion by 2045[3].

3. Executive Position

ALC does not support the Proposal in its current form.

The Proposal would facilitate large-scale residential development of approximately 4,300 dwellings, introducing a residential population of around 13,000 people[4] into a freight, industrial and aviation interface environment characterised by continuous heavy vehicle movements, 24-hour logistics activity, hazardous goods transport, and high-frequency aircraft overflight exposure. This represents a fundamental and irreversible transition from employment-generating industrial land to sensitive residential receptor use within a strategically significant infrastructure corridor.

In ALC's view, this is inconsistent with the EP&A Act requirements for orderly and economic use of land and the public interest.

4. Aviation Exposure, ANEF Integrity and Land Use Incompatibility

The subject site is located directly beneath and immediately adjacent to established aircraft flight paths servicing Sydney Airport's principal runway system, including Runway 16R/34L and Runway 34R. These form part of the primary north–south arrival and departure structure and represent some of the most intensively utilised aviation corridors within the Sydney Basin airspace system.

Operational data for the 12-month period from 1 April 2025 to 31 March 2026 indicates approximately 325 aircraft movements per day within the 06:00–23:00 operating window across these flight path systems. This equates to more than 118,000 aircraft movements annually, with peak daily activity

[2] About Kurnell - Sutherland Shire

[3] https://www.masterplan2045.com.au/pillars/economy/

[4] https://www.planningportal.nsw.gov.au/sites/default/files/documents/2026/1.%20Kurnell%20-%20Explanation%20of%20Intended%20Effect.pdf

reaching up to 483 movements, or approximately one movement every 2.1 minutes during operating hours, thus reflecting a continuous, high-frequency aviation exposure environment[5].

Sydney Airport's Master Plan 2045[6] forecasts a one-third increase in total aircraft movements over the next 20 years, indicating a material escalation in both frequency and cumulative noise exposure over the life of any future residential development. The Proposal contemplates approximately 4,300 dwellings accommodating around 13,000 residents. This represents a significant intensification of sensitive receivers within a defined aviation noise corridor and introduces a population more than five times that of Kurnell (approximately 2,500 residents) into this exposure environment. The noise assessment underpinning the Proposal relies on Australian Noise Exposure Forecast (ANEF) 2039[7] modelling. This has been superseded by ANEF 2045, which incorporates updated forecasts for aircraft movements, fleet mix and flight path distribution. In parts of the subject area, the updated contours extend further across the site, indicating increased exposure relative to earlier assumptions. Under the *Airports Act 1996* (Cth) framework and AS2021:2015, ANEF contours constitute the primary statutory basis for assessing land use compatibility in aircraft noise-affected areas. Within this framework, residential development within higher exposure bands (commonly above 25 ANEF) is generally considered incompatible due to the permanent, external and non-mitigable nature of aircraft noise exposure. While acoustic treatment may reduce internal noise levels, it does not address external exposure, outdoor amenity impacts, or cumulative frequency effects. The introduction of high-density residential development into this location therefore gives rise to a foreseeable and material land use conflict. This includes a high likelihood of sustained noise complaints and associated expectations for operational constraint, giving rise to a classic reverse sensitivity risk affecting pre-existing lawful aviation operations.

Such outcomes are inconsistent with established ANEF-based land use planning principles, which seek to prevent the encroachment of sensitive receivers into declared aircraft noise exposure areas where long-term operational certainty and infrastructure efficiency would otherwise be compromised. The proposal therefore presents a material risk of undermining the integrity of aviation noise planning controls and introducing avoidable interface conflict within a nationally significant aviation corridor, with consequential implications for network efficiency, freight connectivity and broader economic productivity.

5. Freight–Industrial System Efficiency and Reverse Sensitivity

The Kurnell–Port Botany corridor operates as an integrated 24-hour freight and industrial system supporting container logistics, fuel distribution, maritime servicing, industrial processing, and heavy vehicle movements. Introducing sensitive residential receivers into this environment creates reverse sensitivity dynamics, whereby amenity expectations progressively drive constraints on lawful freight and industrial operations, including operating hours, environmental thresholds, and freight access conditions. When combined with aviation exposure, this creates a dual-interface escalation pathway in which both freight and aviation systems are subject to incremental constraint pressures emerging through complaints and consent-based regulatory adjustments rather than explicit planning intent. At a system level, this results in reduced freight consolidation, longer distribution chains, and increased congestion across metropolitan logistics networks, thereby reducing overall operational efficiency.

[5] https://downloads.ctfassets.net/bceklazo756y/dive5eBJyNgUMcRd8pu8i/b81d56794e90a0375fb3fbe39b390764/Sydney_Airport_Master_Plan_2045_-_Interactive.pdf

[6] https://downloads.ctfassets.net/bceklazo756y/dive5eBJyNgUMcRd8pu8i/b81d56794e90a0375fb3fbe39b390764/Sydney_Airport_Master_Plan_2045_-_Interactive.pdf

[7] https://www.airservicesaustralia.com/industry-info/anefs-and-aneis/

6. Ecologically Sustainable Development System Efficiency

Under the EP&A Act, ESD requires application of intergenerational equity, the precautionary principle, and efficient use of environmental and built resources. Integrated freight, industrial and aviation precincts represent inherently efficient systems, enabling consolidation of freight tasks, reducing duplication of movements, and improving infrastructure utilisation efficiency across constrained corridors. This translates into reduced emissions intensity per unit of freight moved and improved metropolitan servicing efficiency. Fragmentation through residential encroachment introduces spatial discontinuities in freight routing, increases reliance on longer distribution chains, and reduces consolidation opportunities across industrial nodes. It also constrains co-location of electrification infrastructure, intermodal systems, and alternative fuel deployment within purpose-designed industrial environments. These effects represent a systemic reduction in environmental efficiency rather than isolated land use impacts.

7. Strategic Industrial Land Supply and Economic Productivity

Metropolitan Sydney operates under structurally constrained industrial land supply conditions, particularly in proximity to ports, freight corridors, and logistics infrastructure. The Kurnell Peninsula forms part of this finite and strategically located industrial land base, deriving its value from integration with Port Botany and established freight and energy networks. Once converted to residential use, such land is permanently removed from the freight and logistics system with no practical capacity for replacement within the metropolitan boundary. This results in longer freight haul distances, increased logistics costs, displacement of industrial activity to lower-efficiency locations, and reduced capacity for future supply chain investment. At an economy-wide level, these impacts manifest as reduced logistics productivity, diminished trade competitiveness, and cumulative inefficiencies in urban freight distribution systems. These impacts are irreversible and represent a long-term depletion of strategically located industrial capacity. Conversion to residential use is therefore inconsistent with EP&A Act objectives when assessed at metropolitan freight system scale. The position is consistent with prior NSW strategic planning frameworks, which identified the Kurnell Peninsula as unsuitable for residential development due to aviation exposure and interface constraints.

8. Alternative Land Use Outcomes

ALC does not oppose redevelopment of the site. However, alternative land uses should be prioritised that are compatible with freight and aviation interface constraints and surrounding industrial activity. These include logistics and urban distribution facilities, advanced manufacturing and clean industrial uses, low-carbon energy infrastructure, maritime and industrial support services, and freight technology and innovation precincts. Such uses would support economic diversification and productivity while maintaining the functional integrity of the broader infrastructure system.

9. Conclusion

The Kurnell Peninsula represents a strategically significant component of a multi-layered infrastructure system comprising freight, industrial, energy, maritime and aviation functions that collectively underpin the economic performance of New South Wales. The Proposal would introduce a large residential population into a high-intensity interface environment characterised by freight operations, industrial activity and high-frequency aircraft exposure. This creates a foreseeable and structural land use conflict that is inconsistent with the *Environmental Planning and Assessment Act*

1979 (NSW), particularly the principles of orderly and economic land use, ecologically sustainable development, and the public interest. For these reasons, the Australian Logistics Council does not support the Proposal in its current form and recommends that alternative employment-generating land use outcomes be pursued that preserve the strategic integrity of this nationally significant infrastructure corridor.