

18 August 2026

Major Projects – Newcastle Logistics Precinct - Intertrade
NSW Department of Planning, Housing and Infrastructure
Submitted via NSW Planning Portal

Dear Recipient,

Submission on Environmental Impact Statement for Newcastle Logistics Precinct – Intertrade (SSI-82049456)

Port Waratah Coal Services welcomes the opportunity to make a submission on the Environmental Impact Statement (EIS) for the Newcastle Logistics Precinct – Intertrade Project (NLP). Port Waratah has been receiving, stockpiling, blending and loading coal for export at the Port of Newcastle for 50 years. They own and manage the Kooragang and Carrington Coal Terminals, which operate 24/7, and have a combined capacity of 145 million tonnes per annum.

Port Waratah is committed to understanding and fulfilling their responsibilities as an employer and community member, as well as meeting their legal obligations. Port Waratah is an unlisted public company working in partnership with more than 25 producers and other service providers in the Hunter Valley Coal Chain. They aim to continuously improve their environmental performance, contribute to the local economy by buying and employing locally and support the sustainability and resilience of the local community through their Community Investment and Partnership Programme. Carrington Coal Terminal (CCT) was first approved to operate in 1975 and has had subsequent major and minor approvals:

- DA 240/74 in 1975 for Carrington Coal Terminal (25 Mtpa)
- DA 178/80 in 1980 for Carrington Coal Terminal Expansion (25 Mtpa)
- DA 418/81 in 1982 for Amendment to Carrington Coal Terminal Expansion (25 Mtpa)

CCT is nearby the proposed Newcastle Logistics Precinct – Intertrade site and has the potential to be impacted by construction and operational activities. The majority of the terminal is located within the SP1 lease area managed by the Port of Newcastle, shown in *Figure 1* below



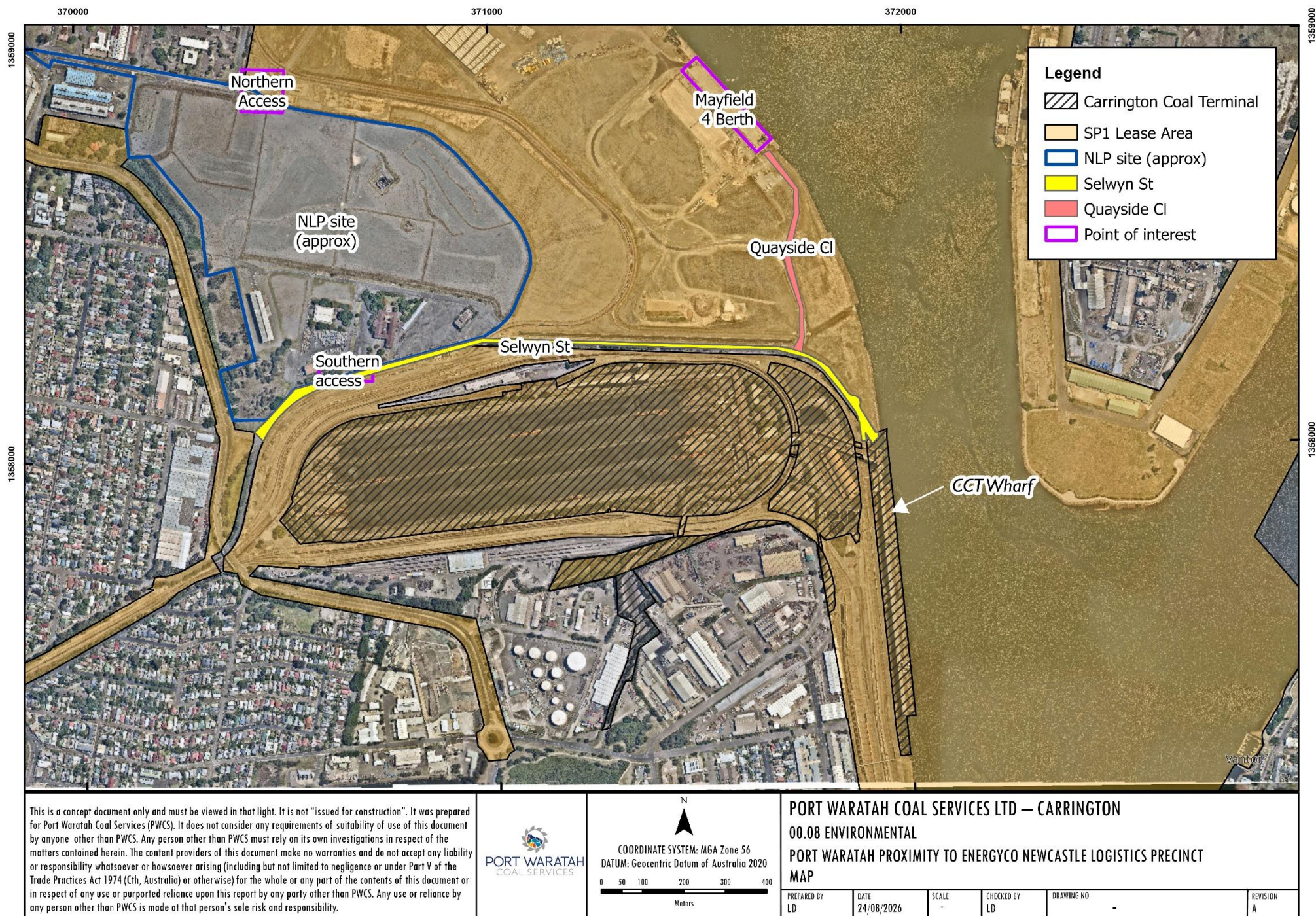


Figure 1 - Port Waratah proximity to EnergyCo Newcastle Logistics Precinct

Statement of conditional support

Port Waratah have reviewed the Environmental Impact Statement (EIS) and other related material for the Newcastle Logistics Precinct – Intertrade (SSI-82049456). In principle, Port Waratah support the strategic development of portside land in the Special Activities Zone where the development is compatible with existing heavy industry, freight, rail and port operations. We recognise the importance of the NLP and how it would contribute to the overall delivery of the Renewable Energy Zones across NSW.

Port Waratah's support is subject to the matters raised in this submission being appropriately addressed through further consultation and practical mitigation measures. The project has potential to disrupt operations at our nearby Carrington Coal Terminal, during both construction and operational phases. We would like to raise the following matters for consideration by EnergyCo and the NSW Department of Planning, Housing and Infrastructure (DPHI) prior to project approval:

1. Stakeholder engagement
2. Traffic and access
3. Land use and property
4. Noise and vibration

Key matters requiring resolution

Stakeholder engagement

Figure 1 shows the proximity Port Waratah's Carrington Coal Terminal to the NLP Intertrade site, less than 200 metres to the south. The Environmental Impact Statement identifies *Industry* as a key stakeholder group for the project. Whilst Port Waratah is a member of Business Hunter, HunterNet and the broader Logistics operators, we believe that the engagement objectives in Section 5.1.1 of the EIS cannot be met unless we are engaged as an individual stakeholder.

The EIS shows expected impacts to the Carrington Coal Terminal during both construction and operation. It appears that in Figure 1-2 of the EIS, our operation is misrepresented as the Morandoo Freight Yard.

Port Waratah initiated engagement with EnergyCo directly when the EIS went on public exhibition, and have had two meetings with the project team before the EIS public exhibition end.

Going forward, Port Waratah request that we are consulted on the other matters raised below, relevant to potential impacts on our Carrington operation, as constructive operational interface communications and engagement are established.

Traffic and access

Figure 1 shows the location of the Carrington Coal Terminal and CCT wharf in proximity to the NLP Intertrade site. Figure 2 shows the single road access point to CCT wharf and other relevant site access constraints. We wish to comment on the site-specific mitigation measures proposed to minimise traffic and access impacts.



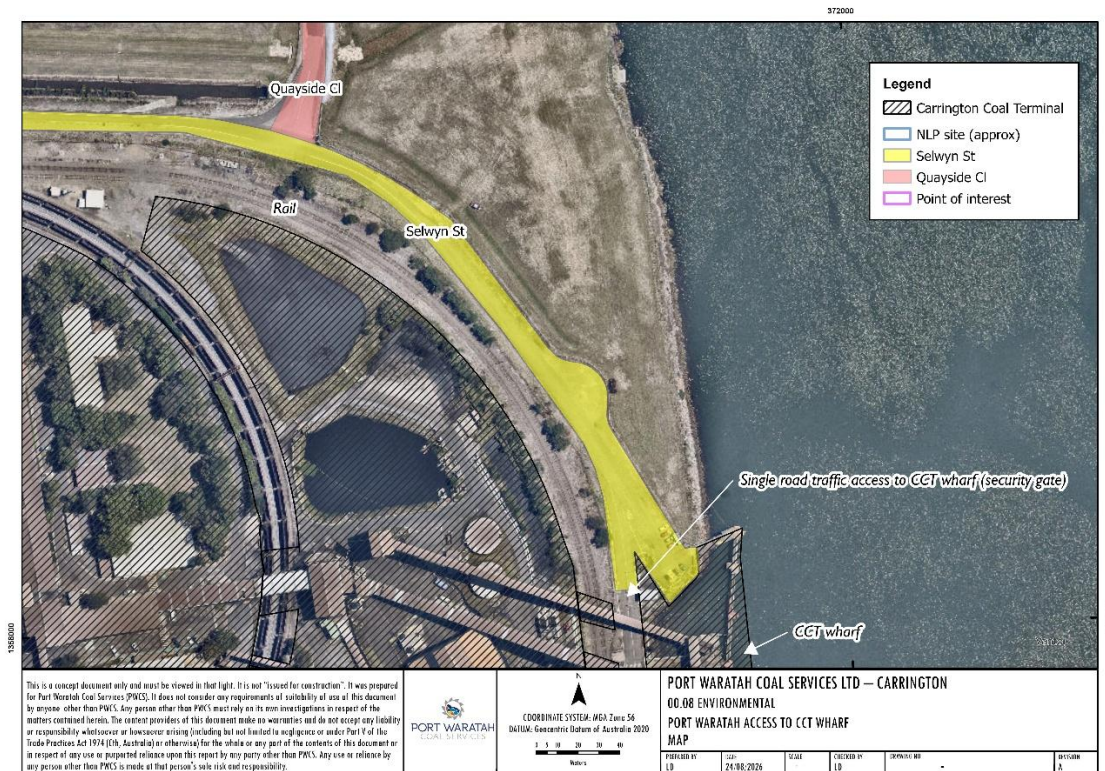


Figure 2 - Port Waratah single point access to CCT wharf via Selwyn Street

1. Port Waratah assume that OSOM movements within the SP1 Lease area are also subject to National Heavy Vehicle Regulator permit conditions. i.e. when transporting cargo from Mayfield Beth 4, along Quayside Close and Selwyn Street to the NLP southern accesses. Please inform us if this is not the case.
2. Access for all road vehicles to the CCT wharf is limited to a single access point: via Selwyn Street. Figure 2 shows the location of the ARTC rail infrastructure that constrains all vehicular access to the CCT wharf via the security gate on Selwyn Street. There is no vehicular access to the CCT wharf from the south or any other access alternatives. Therefore, Port Waratah personnel can only access the CCT wharf (operated 24/7) by driving from:
 - [Industrial Dr / George Street intersection]
 - Along Selwyn Street
 - Straight through the [Selwyn Street / Quayside Close intersection]
 - Arrive at the Port Waratah security gate.

Elevated gantry infrastructure allows the transfer of coal from the Carrington Coal Terminal stockpile area (Lot 1 DP1044636), over ARTC rail infrastructure, to coal loaders at the CCT wharf (Lots 1 and 2 DP1104199).

Port Waratah operates the Carrington Terminal on a 24/7 basis and requires unimpeded access for efficient operational activity, crew changes, emergency response, and breakdown response.

Port of Newcastle and Stothaven have been specifically identified as a key stakeholder on final staging and construction methodology, including any temporary configuration of the road. Port Waratah request to be extended the same courtesy, so we can be informed on upcoming restrictions and work with EnergyCo to maintain access along Selwyn Street where it is critical to our business.

Port Waratah would also need to be informed if/when utility works were going to disrupt access and safe movement to our operation.

3. Port Waratah can appreciate that OSOM movements from the NLP site to the Industrial drive intersections will be managed with:

- NHVR permit conditions
- Outbound OSOM loads generally restricted to 9:00pm – 3:00am
- Inbound OSOM loads generally restricted to 9:30am - sunrise

If the northern access is constructed prior to NLP operational phase (as intended), the potential impact to our business is manageable.

If the NLP begins operating without the proposed northern access in place and all 42 OSOM movements per day (M4 to site) are via the southern access, the impact to our operations could be significant.

Port Waratah would like to request:

- Consultation on traffic management planning for the NLP construction phase, particularly how it affects vehicular traffic trying to access Port Waratah's CCT wharf via Selwyn Street during 24/7 operations
- Consultation on traffic management planning for the NLP operation phase, including a timeline on when the northern access road will be constructed (i.e. ensure it is in place before NLP operation, to prevent significant impact to our business).
- Additional information on the nature of the OSOM movements:
 - Will the OSOM movements take up both lanes of Selwyn St when travelling between the Mayfield Berth 4 and NLP site?
 - If traffic is inhibited in both directions as the OSOM load travels, approximately how long does one movement take to go from Quayside Close / Selwyn Street intersection → to NLP southern access? i.e. how long would Port Waratah personnel be delayed getting to the wharf?

We appreciate the consideration for maintaining adequate operational emergency access, which could be required to service the CCT wharf.

4. Port Waratah would like to be consulted during the development of the CEMP and OEMP traffic management sections to ensure impact to our operations are considered (as above).



Land use and property

Port Waratah wish to comment on the site-specific mitigation measures have been proposed to minimise land use and property impacts.

1. Port Waratah are also a key port user.
2. Port Waratah's use of Selwyn Street to access the CCT wharf should be considered during detailed design, when planning for road upgrades to accommodate the OSOM movements.
3. Port Waratah is a standalone port/industrial user that should be consulted on this matter as described.

The EIS only considers impact to port operations during construction. As described in the traffic section above, OSOM movements during the operational phase will have a significant impact to our port activities, especially if the northern access is not constructed.

Port Waratah want to understand the expected delays to our personnel attempting to access the CCT wharf if it coincides with an OSOM movement via Selwyn Street. E.g. 30 minute delay, 5 minute delay.

Noise and vibration

Port Waratah have reviewed the expected noise and vibration modelling (unmitigated) in Section 11 of the EIS. The modelled noise contours cover some of the northern edge of our stockpile area, which should be classed as an industrial land use.

Overall, the proposed site-specific mitigation measures for noise and vibration impacts presented in Table 11-15 seem adequate.

Conclusion

Port Waratah acknowledge the strategic significance of the Newcastle Logistics Precinct – Intertrade project, to provide portside logistics capacity to support the delivery of the Renewable Energy Zone infrastructure across NSW.

Port Waratah's support is subject to the matters raised in this submission being appropriately addressed through further consultation and practical mitigation measures. We wish to continue the safe and reliable operation of the Carrington Coal Terminal, alongside the operation of the NLP.

Thank you for the opportunity to submit this letter.

Yours sincerely,

Trudie Larnach

Manager of Sustainability and Corporate Affairs
Port Waratah Coal Services Limited

