

28 February 2018

Director, Hunter Region  
NSW Department of Planning and Environment  
PO Box 1226  
NEWCASTLE NSW 2300

Dear Sirs

**SUBMISSION ON THE GREATER NEWCASTLE METROPOLITAN PLAN -**

**CRITICAL IMPORTANCE OF THE CARRINGTON COAL TERMINAL TO THE COAL INDUSTRY**

Yancoal Australia Limited (Yancoal) welcomes the release of the Greater Newcastle Metropolitan Plan 2036 and supports a sustainable growth strategy for the region. We also support the plan's commitment to the continued protection of the Hunter Valley Coal Chain.

However, we are concerned about specific comments regarding the Carrington Coal Terminal. The plan states that NSW Department of Planning and Environment (DPE), working with Port of Newcastle and Newcastle City Council, will "*investigate the potential to relocate coal export facilities*" away from the Carrington precinct.

The Carrington Coal Terminal is an integral part of the Hunter Valley Coal Chain, with an annual export capacity of up to 25 million tonnes. It has operated for over 40 years, is a significant local employer and pro-actively works with its neighbours and the local community to minimise adverse impacts.

We acknowledge that the inner-city suburbs of Newcastle, including Carrington, will change over time. We recognise that, in the longer term, relocation of Carrington's coal export facilities may be a valid consideration. However, we do not accept that relocation is desirable or realistic in either the short or medium term.

Such a consideration, first and foremost, must ensure that there is **no detrimental impact** on the coal supply chain. Any actions to the contrary would contradict government commitments and significantly impact the region's coal sector.

To preserve the integrity of the coal chain, and the coal industry in the Lower and Upper Hunter which rely upon sufficient port capacity, any plans to close or to relocate the Carrington Coal Terminal must be properly thought out. Such plans must give due regard to valid government consents, commercial arrangements, and reliance on existing infrastructure for continued export capacity and commercial arrangements. It is also important to note over \$80 million has been invested in capital projects at the Carrington terminal in the past five years.

We are particularly concerned about the intention to discuss relocation of these major facilities without engaging with either the operator of the Carrington Coal Terminal or its major customers. Any unilateral action without engagement and input from key stakeholders would not only cause a major loss of confidence from the business community, but potentially impact the supply chain.

Yancoal is of the strong view that the plan should be amended to recognise that the Carrington Coal Terminal is an integral part of the Hunter Valley Coal Chain. Furthermore, any consideration of relocation in the longer term must include engagement and consultation with the operator and major customers of the facilities.

Yours sincerely



**Mark Jacobs**

General Manager, Environment & Community  
Yancoal Australia Limited