

20 August 2026

Vageesha Wellage
Planning Officer, Transport and Water Assessments
Department of Planning, Housing and Infrastructure
4 Paramatta Square, 12 Darcy Street, Paramatta NSW 2124

Via email: vageesha.walgamawellalage@dphi.nsw.gov.au

Dear Vageesha,

Re: DA 8137 Modification 4: Mayfield Cargo Storage Facility - Response to Further Information

We refer to your Request for Additional Information dated 20 July 2026 (case AI-2200075) in relation to DA 8137 Modification 4 (Mod 4) associated with the Mayfield Cargo Storage Facility, which is required by 21 August 2026.

Enclosed is a response to the items raised by the Department of Planning, Housing and Infrastructure (DPHI), prepared by GHD Pty Ltd (GHD).

We trust that the attached satisfies DPHI's request to progress the assessment. If you require further clarification, please do not hesitate to contact me.

Yours sincerely,



Laura Wyatt
Senior Planning Manager
Port of Newcastle

Attachment 1: DA 8137 Mod 4 Response to Further Information (August 2026)

Your ref: DA8137-MOD-4
Our ref: 12622176

20 August 2026

Laura Wyatt
Senior Environmental Planner
Port of Newcastle Operations Pty Ltd
Laura.Wyatt@pon.com.au

DA8137 MOD 4 – Modification to Mayfield Cargo Storage Facility – Request for additional information

Dear Laura

I refer to the request (Case ID AI-2200075) for additional information from the Department of Planning, Housing and Infrastructure (DPHI) on 20 July 2026 in relation to the above modification application DA 8137 Modification 4 (Mod 4). The DPHI request for additional information is as follows:

1. Response to TfNSW email (16/07/2026), including justification of proposed traffic movements with reference to Conditions 2.7 and 2.9 of the Mayfield Concept Plan.
2. Status of road upgrades under Condition 2.7 and Attachment B (Traffic Management Plan).
3. Monthly traffic monitoring details for DA8137, Stolthaven and DA293-08-00.
4. Hardstand construction details and approval pathway.

Please find details for each of these responses outlined below.

Response to TfNSW email (16/07/2026), including justification of proposed traffic movements with reference to Conditions 2.7 and 2.9 of the Mayfield Concept Plan.

1. TfNSW email of 16/07/2026 including justification of proposed traffic movements with reference to Conditions 2.7 and 2.9 of the Mayfield Concept Plan

The TfNSW email of 16/07/2026 stated that:

TfNSW considers our response, dated 4 June 2026 (attached), remains valid. This is based on TfNSW interpretation of Condition 2.7 & Condition 2.9, being that the listed road intersection shall be upgraded prior to the operation of any projects associated with the Concept Plan, unless the timing, staging, etc are varied subject to considerations outlined in Condition 2.9. TfNSW recommends that a proper traffic assessment is the appropriate study to ensure compliance with these conditions.

The TfNSW response dated 4 June 2026 was addressed within the project's formal Response to Submissions (RTS) prepared by GHD dated 2 July 2026 and titled 'DA 8137 (Mod 4) Mayfield Cargo Storage Facility Southern Expansion | Response to Submissions'.

Following receipt of the TfNSW email of 16/07/2026, GHD have prepared the following further addressing the interpretation and timing implications of Condition 2.7 and Condition 2.9, as further informed by Conditions 2.3 & 2.4.

Condition 2.3 established explicit traffic-based trigger thresholds under the Mayfield Concept Plan.

The Mayfield Concept Plan approval establishes a staged and performance-based approach to transport infrastructure delivery. While Condition 2.7 identifies a number of road intersections for upgrading, Conditions 2.3 and 2.9 make it clear that the extent and timing of infrastructure delivery is intended to be linked to actual traffic demand, network performance and future project assessments, rather than requiring all future infrastructure upgrades to be implemented up front regardless of demonstrated need.

Condition 2.3: Establishes explicit traffic-based trigger thresholds

Condition 2.3 provides that:

"Projects associated with this Concept Plan shall not exceed the total truck movement limits presented in Table 1, except as identified."

The condition establishes three distinct stages of development as detailed in Table 1.

Table 1 Summary of Condition 2.4 staging and total truck movement limits

Stage	Annual Truck Movements	Daily Truck Movements	Peak Hour Truck Movements
Initial Staging	462,104	1,268	95
Intermediate Staging	773,438	2,120	159
Ultimate Staging	1,017,882	2,790	209

The approval then expressly provides a pathway to exceed the Initial Staging thresholds where:

"Traffic monitoring [identifies] that Concept Plan related traffic movements are not having a detrimental impact on the local, regional and State road network."

and

"The consideration of land use planning and development changes within the locality of the Concept Plan site..."

Further growth beyond the Intermediate Staging thresholds is only permitted where there is:

"Implementation of a Transport Infrastructure Strategy as per requirement 2.4, which has been endorsed by Transport for NSW and RMS."

Importantly, the note accompanying Condition 2.3 states:

"The above requirements do not permit an immediate increase to the identified limits in Table 1. Any exceedances of the limits identified in Table 1, consistent with the above requirements, shall only be permitted, following consideration of the exceedances in future project assessments."

This wording is significant because it confirms that the Concept Plan envisages a progressive increase in traffic volumes over time, with corresponding consideration of infrastructure requirements through future project approvals. The approval therefore adopts a trigger-based framework rather than assuming ultimate traffic volumes from commencement and the requisite upfront infrastructure upgrades this would trigger.

Condition 2.7: Does not mandate fixed upgrade timing

Condition 2.7 identifies the following intersections for upgrade:

- Industrial Drive / Ingall Street.
- Industrial Drive / George Street.
- George Street / Selwyn Street.

While Condition 2.7 initially states that:

"The following road intersections shall be upgraded prior to the operation of any projects associated with this Concept Plan..."

it is critical to read the remainder of the condition. Immediately following the identification of the intersections, Condition 2.7 states:

"The timing, staging, scope and design of the upgrades may be varied, subject to consideration of the matters outlined in requirement 2.9."

This qualification is fundamental. It expressly allows the timing and staging of the upgrades to change. Accordingly, Condition 2.7 cannot reasonably be interpreted as requiring all identified road works to be undertaken upfront irrespective of traffic demand. Instead, the condition specifically defers consideration of the appropriate timing and scope of upgrades to the assessment process established under Condition 2.9.

Condition 2.9: Allows subsequent project approvals to revise infrastructure requirements

Condition 2.9 provides the clearest indication of the approval's intent, stating:

"The final timing, staging, scope and design of the Transport Infrastructure Upgrades identified in requirements 2.6, 2.7 and 2.8 may be revised by subsequent project approvals..."

The use of the words "may be revised by subsequent project approvals" demonstrates that the infrastructure identified at Concept Plan level was not intended to establish inflexible upfront obligations. Rather, the approval contemplated that detailed project applications would reassess and refine infrastructure delivery based on prevailing circumstances.

In relation to road infrastructure, Condition 2.9 specifically requires consideration of:

"The level of traffic generated by the operation of the project and the consideration of existing and approved development..."

"Satisfactory performance of the intersections, including Level of Service, Degree of Saturation, and queue lengths;"

"Traffic management measures designed to reduce vehicle movements or distribute movements between the intersections;"

and

"Safe access between and to precincts both from within and outside the site..."

These criteria are all performance-based considerations. They focus on actual traffic generation, demonstrated intersection performance and operational outcomes. They do not establish a requirement for infrastructure delivery in advance of need.

Justification for Mod 4

When Conditions 2.3, 2.7 and 2.9 are read together, the approval establishes a clear planning framework whereby:

- Truck movements are monitored against defined thresholds.
- Progression to higher traffic levels is contingent upon satisfactory traffic outcomes.
- Transport infrastructure upgrades may be implemented progressively as traffic demand increases.
- The timing, staging and scope of upgrades can be revised through subsequent approvals.
- Infrastructure requirements are to be informed by actual intersection performance, traffic generation and network conditions.

Accordingly, the approval does not require the nominated road infrastructure upgrades to be delivered at the outset of development. Instead, it expressly provides for the timing, staging, scope and design of upgrades to be reconsidered as future projects proceed and as traffic generation approaches the relevant thresholds established under Condition 2.3.

Current traffic monitoring (provided in Section 3) demonstrates that truck movements remain well below the Initial Staging limits established by Condition 2.3, it is concluded that the circumstances contemplated by the approval for more extensive transport infrastructure interventions have not yet arisen, and that the progressive delivery mechanism contemplated by Conditions 2.3, 2.7 and 2.9 remains the appropriate approach.

PON has undertaken multiple Independent Environmental Audits (IEA) to ensure compliance with the requirements of the consent. None have identified a non-compliance in relation to the traffic and infrastructure threshold levels. All project traffic which services movement through the Mayfield Cargo Storage Facility is counted as part of this traffic monitoring. Mod 4 seeks expansion of the storage area with no change to the number of staff employed, no change to the hours of operation, and continuation of the traffic management measures established for the facility. Transport monitoring will continue to be applied in a manner consistent with the requirements of approval and published on PON's website. The most recent IEA was undertaken in January 2024 and is available on the DPHI [Major Project Portal](#).

2. Status of the road upgrades under Condition 2.7 and Attachment B (Traffic Management Plan)

The Mayfield Concept Plan approval requires infrastructure upgrades triggered by defined traffic generation thresholds. Based on the traffic monitoring undertaken to date (provided in Section 3), these thresholds have not been exceeded, and therefore no infrastructure upgrades have been triggered under the Mayfield Concept Plan approval.

3. Monthly traffic monitoring details for DA8137, Stolt-haven and DA293-08-00

In accordance with the relevant conditions of consent for SSD 7065 (Stolthaven), DA 8137 and DA 293-08-00, and the associated Traffic Management Plans, a traffic monitoring program has been implemented that is consistent with the overarching requirements of the Mayfield Concept Plan.

Traffic monitoring reports prepared for the Mayfield Concept Plan are publicly available on PON's website and can be accessed via the following link: [Mayfield Concept Plan – Port of Newcastle](#).

To ensure compliance with the provisions of the Mayfield Concept Plan approval all PON tenants and licensees operating under the Mayfield Concept Plan are required to provide truck movement information on a bi-monthly schedule. There are currently two projects operating under the Mayfield Concept Plan Approval:

- Stolthaven SSD 7065, commencing December 2016.
- Mayfield Cargo Storage Facility DA 8137, commencing July 2017.

Total truck movements per annum are reported using a rolling cumulative total over the preceding 12 months period. The total daily truck movements are reported using a per day average across the 12-month period. The total hourly truck movements during peak periods are reported using data sourced from an automatic traffic counter on site.

The truck movement monitoring is consistently showing truck movements well below the Initial Stage threshold trigger level set by Condition 2.4 of the Mayfield Concept Plan approval. For example, the recorded average daily movements for May and June is 245 truck movements per day, well under the Initial stage threshold of 1268 per day.

4. Hardstand construction details and approval pathway

DPHI has requested information in relation to:

- The approval pathway for the hardstand.
- The construction methodology for the hardstand.

Approval pathway

The Multi-Purpose Terminal and associated remediation works for the Closure Area (DA 293-08-00) was approved by the then Department of Urban Affairs and Planning (DUAP), now DPHI, on 6 April 2001. The project was assessed in the *Development of a Multi-Purpose Terminal and Remediation of the Closure Area, BHP Newcastle Steelworks Environmental Impact Statement* (URS, 2000) (EIS). The EIS describes the various components of the approved development, including the construction of hardstand across the entire Closure Area. Accordingly, the hardstand has already been approved under DA 293-08-00.

For the avoidance of doubt, no additional hardstand area is proposed as part of this modification application. The hardstand area will be constructed pursuant to DA 293-08-00.

Construction methodology

In considering the construction methodology it is noted that this will be undertaken in accordance with the requirements of DA 293-08-00 and not the modification to which this letter primarily relates. It is therefore not considered necessary to replicate the construction methodology in this letter. Details of the construction methodology and projects approvals can be found on the DPHI Major Projects website: [Site remediation BHP steelworks site | Planning Portal – Department of Planning and Environment](#).

We trust this information provides further clarity on these matters. Don't hesitate to contact the undersigned if you have any further comments.

Regards



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Attachment: Mayfield Concept Plan Approval 09_0096 Bi-Monthly Traffic Management Report

Attachment 1

Mayfield Concept Plan Approval

09_0096 Bi-Monthly Traffic

Management Report

Bi-Monthly Traffic Management Report

Published July 2026 – for May and June 2026 traffic

In accordance with Schedule 3 Condition 2.3 of the Mayfield Concept Plan (MCP) Approval, projects associated with the Concept Plan shall not exceed the total truck movement limits presented in Table 1 below, subject to identified exceptions which will be considered in future project assessments:

Table 1: Mayfield Concept Approval Truck Movement Criteria for Initial Stage

Permitted Truck Movements Per Annum	462,104
Permitted Truck Movements per day	1,268
Permitted Hourly Truck Movements in Peak Periods	95

To ensure compliance with these provisions, PON requires tenants and licensees operating under the MCP Approval to provide truck movement information on a bi-monthly schedule. There are currently two projects operating under the MCP Approval:

- Stolthaven SSD 7065, commencing December 2016
- Mayfield Cargo Storage Facility DA 8137, commencing July 2017

Total truck movements per annum are reported using a rolling cumulative total over the preceding 12-month period. The total daily truck movements are reported using a per day average across the twelve-month period. The total hourly truck movements during peak periods are reported using data sourced from an automatic traffic counter on site.

Figures 1, 2 and 3 shows the actual number truck movements during the reporting period against the remaining number that is permitted, for the different time periods (annual, daily, during peak period). The figures show that the number of truck movements associated with the development are below the permitted volume.

Figure 1: Annual Truck Movements
[Rolling Cumulative Total]

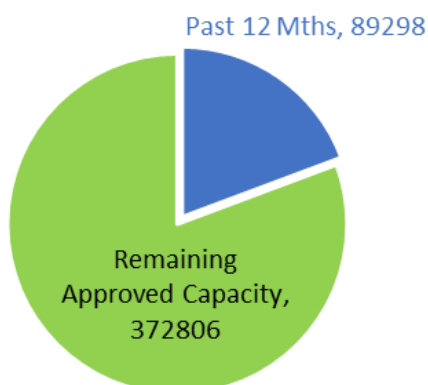


Figure 2: Average No. of Daily Truck Movements

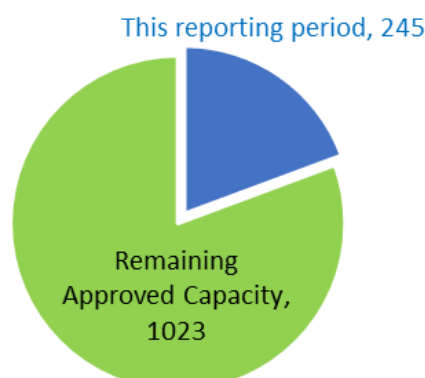


Figure 3: Average No. of Truck Movements During Peak Period

