

## **Hunter Transmission Project - EIS Review Submission**

### **EIS Review Timeframe – What a farce!**

Properties are being acquired, construction road pavement testing is being conducted, new project delivery staff are being recruited, the construction tender process has been started, bidding contractors have people checking the landscape ..... did I miss that the project has already been approved?

Clearly EnergyCo think this is all a fait accompli.

With a strong gut sense of why bother getting involved in the process again, I have bothered to commit some precious time and throw a few challenges to the Department in the expectation this proposal is still getting a serious test before it gets the inevitable 'green light'.

EnergyCo has spent 3 years in the project development / planning phase for this critical infrastructure project. It helped itself to an additional year to complete the EIS beyond the earlier notified exhibition timing of late 2024. Stakeholders are now afforded 1 month to navigate and digest over 1100 pages of EIS and over 30 supporting technical reports.

Many stakeholders, myself included, actually have busy lives and it is just plain impossible to absorb the content of interest to them and provide solid feedback with such a timeframe. Government organisations with dedicated resources would also struggle to make comprehensive reviews in this time

This EIS review period is frankly farcical, disrespectful and just plain unfair to community stakeholders. My neighbour called it a "snow job" on the part of EnergyCo and I can only but agree – we have been buried under a dumping and finding it hard to dig a way out.

Of course the consequence of this arrangement is that there will be many interested people too daunted to even bother getting involved and for those that muster the motivation, the review and feedback will be more restricted and superficial than could otherwise have been the case.

While 1 month of EIS exhibition may fulfil EP& Act obligations, this is far from being in the spirit of productive community involvement as envisaged by the objectives of the Act. For a large and complex EIS of this nature, the good citizen credentials of the proponent would allow more time for the stakeholders to have a proper say. Shame on EnergyCo....the planning process has been compromised as a result.

Mindful of this, the following comments in this submission are limited to a few matters of particular personal concern:

- Preferred corridor choice has still not been proven as the most suitable alternative in the documentation made public (including the EIS)
- Project justification as presented is inadequate due to failure to address some matters vital to such a question, in particular the economic benefits and costs and the massive biodiversity impacts. This in addition to the failure to comprehensively demonstrate that the most suitable corridor was adopted
- Some local community impact issues in the Millfield / Mount View area which are substantially understated in the EIS and require further close scrutiny

### **Personal Situation**

The perspective I bring to this submission includes:

- Support for the NSW Government strategy for transformation of the energy system so we can move rapidly to a more sustainable future.
- Support for the concept of the HTP as a vital transmission link between major nodes in the NSW electricity supply network
- Real interest and concern about the quality, robustness and transparency of the planning effort that goes into the development of major linear infrastructure and especially publicly funded proposals such as this HTP
- A rural resident in the Millfield / Mount View Rd area and hence some NIMBY reaction to local issues, most particularly the intended use of Mount View Rd for construction access

### **Corridor Selection Process**

With a long running professional interest in linear corridor planning and assessment, I was motivated to explore the robustness of this crucial phase of HTP development. Living in a potential impact area also heightened my interest. However, I was essentially 'sidelined' by EnergyCo's refusal to share its deliberations with transparent access to the documents it prepared to inform its corridor selection decision. In this regard, the timeline is very pertinent .... to be clear I was seeking the information generated up to and used at the time of the preferred corridor selection. The EIS chapter on alternatives was produced long after that crucial project decision was made.

In early 2023 EnergyCo released initial details about the three corridor options being examined for the HTP and announced the Southern corridor as the Preliminary / Preferred corridor in December 2023. My submission of 18 December 2023 (on behalf of ~15 local north Millfield rural residents) focussed on this and requested the detailed corridor options evaluation documents used to inform the decision. Specifically, we asked for details of all options considered, preliminary route maps and concept arrangements (eg. tower locations), assessment criteria and any criteria weightings / priorities, comparative analysis of short-listed options (hopefully in tabulated form), and the decision rationale based on that analysis.

We had reckoned this to be a very legitimate request to EnergyCo given the vital phase reached in the project development process and noting that the public information documents released were very generalised and 'light weight' in terms of technical and quantitative content. Subsequent project updates also did not provide any detailed information. The project Scoping Report subsequently issued to DPIE says a detailed evaluation of the corridor options was conducted, so we assumed the documentation did actually exist. Being a high cost critical infrastructure project, nothing less would be expected! While EnergyCo was not legally bound to address this crucial issue of project alternatives until the EIS release, I repeatedly made the point that EnergyCo had the opportunity to gain a community imprimatur for the project by sharing the evaluation details before the formal project EIA progressed. All to no avail!

On at least 6 occasions over a 7 month period from December 2023 I made the same document request, mainly through the EnergyCo communications team. I was either ignored or "fobbed off" with the typical response being they will follow up and respond. A final attempt to access the requested documents to the EnergyCo CEO in July 2024 actually resulted in a definitive refusal on 29 July 2024 - see extract below of response from the then Project Director:

*"Tim, we acknowledge your request to 'release the comprehensive documentation that proves they got it right' and hope this summary of the key alternatives that have been considered and rejected proves helpful. At this stage we do not intend to present any further detailed evaluation of the initial corridor selection ahead of the formal project assessment phase"*

The "summary of comprehensive documentation" referred to was an assemblage of material from the previous public information releases and was therefore not at all helpful.

It is possible the EnergyCo project team did select the most suitable corridor based on a comprehensive best practice multi-criteria evaluation. However, we still don't know if this

is the case. EnergyCo refused to yield up documentation at the time of the corridor decision and the EIS assessment of alternatives was crafted well after the event and makes no reference to the supposed documentation. **This leads me to the conclusion that the supposed documentation does not exist**

While EnergyCo represented that it was seeking stakeholder feedback to help shape the project, it remains very obvious that it found my want to interrogate the corridor selection process an unwanted challenge. In my view EnergyCo took no heed of the findings and recommendations arising from the Dyer review regarding early and meaningful community engagement in such projects.

So in summary ..... EnergyCo has not released the documentation that contains detailed, objective, quantitative data that was essential to professionally and adequately evaluate the HTP corridor options during 2023. Consequently the evidence is not available to demonstrate that the southern corridor (which is the foundation of the proposed route) is the most suitable alternative for the HTP. That renders the EIS unreliable and deficient.

### **Economic Assessment & Project Justification**

With the limited EIS review time I have not located any information about project capital cost and conclude it has not been published. Results of a typical project input – output analysis are provided in the economic assessment chapter and this indicates the value proposition expected for the regional and State economies .... although there is no critical commentary or conclusion as to whether those benefits are good, bad or indifferent for the magnitude of capital investment required for the HTP by State and Federal governments. Does the investment actually represent a good spend of public money to realise these predicted benefits. The fundamental questions are not addressed.

The EIS is the sole opportunity for community stakeholders to scrutinise the proposal and as an absolute minimum there should be very clear assessment of the project benefits **and costs**. This is a major and critical public infrastructure spend of national importance – we must know ..... what will it cost us? Is it good value? Is the intended spend better placed into an alternative solution? The questions must be answered satisfactorily as part of the assessment before stakeholders (and the Department as approver) can know if the proposal is justified.

The seeming absence of information about a fundamentally important project assessment criterion is perhaps unsurprising insofar as the earlier development and comparative assessment of project alternatives was also silent on costs and benefits. As noted earlier, this must be interpreted as a serious shortcoming in the route selection decision.

The Department of Industry draft Australian Industry Participation Plan summary gives a high-level capex indicator for the HTP of “\$500M or more” but there appears not to be any other public documentation that hints at cost. The cost could actually be \$1.0billion or even \$1.5 billion? Some industry contacts believe the latter is more likely and if that size capex was inserted into a basic BCA calculation, the benefit values derived in the in the EIS would look very unattractive from the investor perspective.

But why has this essential project cost information been excluded? It must have been an intentional call on the part of EnergyCo and I sincerely trust it is not hiding behind the ‘old chestnut’ of commercial confidentiality because there are upcoming construction tender processes. To suggest that tenderers have ever relied on EIS construction and operation cost data is just nonsense. Those sorts of argument do not stand up to genuine debate and there are many large infrastructure project EISs over the last 20-30 years (with similar delivery phases to follow) that have openly presented detailed concept level cost estimates that include multiple line items covering all typical elements like planning, acquisition, labour, materials, margin / profit, contingencies... and with a suitable estimate risk analysis.

Anything less than this type of project assessment means the project has not been proven as a justified economic proposition and renders this vital aspect of the EIS inadequate.

### **Biodiversity Carnage**

Use of mining and Defence lands, modest land acquisition, bypassing National Parks and avoiding potentially more vocal Hunter communities is understandable. However, one of the most significant trade-offs with the proposed route is the massive hit on over 760 hectares of native vegetation, especially in State Forests. The biodiversity assessment details the nature and scale of ecological impact including on various significant vegetation communities and endangered habitats.

The attraction to State Forests (along with some other public lands) is obvious. It is very convenient to EnergyCo from both a reduced public reaction perspective and easier approvals, the latter because State Forests do not have the same protection status as National Parks and Nature Reserves. However, this overlooks the fact that a very large proportion of the State Forests lands affected by the proposal (eg. Pokolbin SF and Corrabare SF) are in fact of similar biodiversity character and value to the likes of nearby Watagans NP. Because of the forestry status, they unsurprisingly have areas that have suffered more disturbance (but also many areas that are pristine), but with prudent protection and management significant areas could readily recover to be worthy of NP

recognition. It is a fact that the historic establishment of National Parks with lands from State Forests was as much about political battles rather than just based on good science about biophysical resources. In short, Pokolbin and Corrabare SFs still contain highly valuable environmental attributes that are as worthy of protection as neighbouring NPs.

This 'under valuation' of the biodiversity resources of State Forests was one of the many decision aspects or criteria that did not figure satisfactorily in the preferred corridor selection (at least in the documents made public). Per previous comments, a serious comparative assessment would / should have completed a systematic and quantitative assessment of the types and areas of biodiversity impacts between the initial three corridors. A related question remains unanswered by the EIS – is there another corridor with significantly less biodiversity impact? The answer must be Yes ... and brief perusal of satellite imagery, aerial photography, assorted land use and land tenure mapping, as well as some of EnergyCo's early publicity material will confirm as much.

Given the massive scale of habitat destruction it is contended that another vital aspect of project justification has not been established, and hence another EIS deficiency that warrants scrutiny.

The EIS spruiks the Biodiversity credits that will supposedly compensate for the impacts of the proposal. While again convenient for EnergyCo this is frankly not good enough. Something more tangible is required to offset the biodiversity impacts if the HTP proceeds. For instance, put some hard dollar values on the impacts (eg. acquisition of comparable land with comparable qualities; initiate a plan to generate one or more areas of compensatory habitat). There also needs to be some commitment to developing a specific biodiversity compensation management plan (as will be done for other project impact issues) and also to apply a little bit of basic environmental economics and put the real biodiversity impact and compensation cost results into the assessment equation.

## **Local Impact Issues - North Millfield area**

### **Visual Impact**

It is rather stunning that for over 2 years EnergyCo and its staff, advisers and consultants told the community the transmission towers would be up 70m high ..... but the EIS drops a bomb by advising they will be up to 85m.

What a debacle! – incompetence? dishonesty? Certainly blatant misrepresentation of a matter that is pivotal in a key project assessment issue. It casts real doubt over the modus operandi and reliability of the organisation.

Although our dwelling is quite obvious on aerial and satellite imagery (and actually quite visible from MVR) the EIS has failed to identify it on the mapping that shows private dwelling viewpoints. Interestingly, the assessment managed to pick up numerous neighbouring farm sheds as dwellings! From multiple places on the property including the dwelling (inside and out) we have outstanding views of Bimbadeen, Mt Baker ridge and Corrabare Forest range which form a continuous skyline that wraps around the north Millfield valley north of Lewis Lane. This special landscape was a basic attraction when we purchased 18 years ago.

The visual analysis therefore fails to help us with specific imagery or mapping that clarifies just what of the HTP will be visible to us .... but almost certainly we will have some distant views of some elements on the skyline. Near neighbours in a similar situation have been advised by the EnergyCo team at the Millfield drop-in they will have visibility.

The EIS assessment concludes that private viewpoints will have low or no visual impact. With respect this is nonsense. Regardless of what assessment guidelines or techniques were employed, a simple reality is that sensitivity to alteration of a landscape is an inherently subjective judgement which is fundamentally influenced, among other things, by an individuals connection to and perception of their landscape. In this regard, we can tell you that this HTP visual impact, albeit a distant change to our views, is offensive and unwelcome in terms of how we perceive the changes it will cause to our living environment.

Notwithstanding the comments above on the shortcomings of the visual assessment, we do not expect anything of consequence can be done to mitigate or eliminate visual impact, short of adopting another transmission route. So if the project is approved, we just have to "suck it up" and as the EnergyCo representative suggested "get used to it" (that wont happen).

So perhaps the only purpose of these comments on visual impact (yes, very minor in the scheme of the project) is to highlight a significant misrepresentation (re tower height) and more EIS inaccuracies and poor judgement and that the impacts are more than presented. How many other such deficiencies are there in the huge unread reams of EIS content?

## **Roads & Traffic**

Wollombi Rd is intended to be one of the major road thoroughfares for the HTP construction and there are many adverse impacts associated with that plan. I have to assume other EIS submissions will provide specific insights, objections and suggestions to that aspect. While we and our north Millfield rural neighbours also depend on Wollombi Rd for access east to Cessnock and west Wollombi my feedback here is focused on the

proposal to use Mount View Rd (MVR) also as a significant construction route (to access the Mount Baker working zone).

MVR in its current form is only just suitable to serve the small rural community on the southern fall of Mount View (approximately 40 residents) and a small number of wine field tourist trips

The EIS is a little sneaky about forecast construction traffic volumes on Wollombi Rd, providing estimated peak hour numbers (85 vph) but vague on daily movements. The EIS traffic consultant advised this flow could be 850+ vpd for over 2.5 years, albeit variable depending on the type of activity. The traffic volumes on MVR are even more vague but we understand they could be comparable to Wollombi Rd during construction peak in the Mt Baker area. This is a massive increase on the current typical flows of ~50 vpd (based on several counts by local residents). The consequences of this proposal include:

- Property access – mindful of the road condition, narrow formation (especially the long unsealed section north of Lewis Lane) and poor alignment (mainly horizontal – numerous curve with sight distance down to 25-30m), vehicle passing would be impossible and or dangerous at numerous sections along MVR. Traffic control would therefore be essential and very likely at multiple points along the route (ie. Requiring several signal stations or very long control sections) and almost certainly needed all day (not just at peak times). This will cause very significant delays for residents served by MVR. Tourists using the signposted MVR winefields tourist drive to traverse the scenic Mount View will become a non-event
- Road safety – the forecast increase in traffic and the significant jump in long heavy vehicles on MVR would inevitably increase road safety risks, regardless of traffic control procedures. It would take just one “cowboy” truck driver and one slightly inattentive local driver to cause a situation we don’t wish to think about
- Road condition – rapid deterioration during and after rain events. Even short duration heavy rain caused severe scouring and potholing (refer to CCC engineering). This means that frequent maintenance would be warranted over the course of works, which itself would delay construction activity and exacerbate the community related impacts
- Traffic noise and vibration – traffic noise is currently non issue along MVR with the very low volumes of traffic which are almost entirely light vehicles (ex Friday waste trucks and occasional concrete truck). Considering the ambient conditions which are typical of a secluded rural setting, the proposal with up to ~850 vpd including long and heavily laden trucks climbing MVR to Mt Baker would cause a transformed noise environment for up to 2.5 years. The EIS glosses past this issue and

understates the degree of disturbance. The level of negative impact is unacceptable. For dwellings very close to MVR, there is also a high likelihood of vibration disturbance and building damage

Overall, it is apparent that the daily lives and amenity for the community served by MVR would be very significantly eroded during the construction period of up to 2.5 years (and perhaps longer?). It is also evident that the MVR road condition and geometry is unsuitable to support the type and volume of construction traffic proposed. It is clear the EIS has badly understated the suitability of the route for construction purposes and also the severity of the social / community impacts.

The attention to construction stage access was also given scant attention during the corridor / route planning, when it should have figured prominently and objectively as a significant factor in assessing the constructability of options.

The EIS has not demonstrated that MVR is a feasible access option for the Mount Baker works area. In part this is because it has failed to present an account of the pros and cons of other construction access methods and alternatives that have been examined for this construction area of the HTP. Until the outcome of such an evaluation has been presented (and it is well founded), the proposal to use MVR as shown in the EIS is not adequate or acceptable and it should therefore be refused.

### **Environmental Manager**

In the event that MVR route is demonstrated to be a feasible and justified proposal, the role of the Environmental Manager will be vitally important. The person / team appointed to the role should:

- Be involved in the approval of Environmental Management Plans before construction
- Be able to receive direct reports of construction activity that is non compliance with EM Plans from community representatives
- be fully independent of EnergyCo / Transgrid / Contractor and given unrestricted access to all project sites and all documentation relevant to EIS / EM Plan matters
- have authority to issue a stop work order on any construction related activity that is causing an adverse impact that is obviously exceeding what is predicted in the EIS and any implementation / EM Plans (and a requirement to authorise recommencement of the activity when the remedy is determined / implemented)

## Conclusion

- Public EIS review opportunity – serious process failure – the community and other stakeholders have been short changed and effectively hobbled- EnergyCo has done a “snow job” on us
- Corridor selection – EnergyCo refused to provide satisfactory documentation at that time to demonstrate that the most suitable corridor / route option was adopted. This was a significant planning process shortcoming in that corridor selection is one of the most important project development phase decisions to be made. The EIS retrospectively examines project corridor alternatives but the level of detail and absence of vital information does not negate the probable inadequacy of the evaluation of project alternatives
- Project justification – a major and critical piece of publicly funded infrastructure and there is a truly serious paucity of information about economic costs and benefits. Simply makes it impossible to fully and properly assess the merits of the proposal. The EIS is totally inadequate in this area. To approve such a proposal without understanding if HTP is a good economic proposition would be a travesty. The failure of the EIS and the earlier corridor / route planning stages to adequately assess the comparative biodiversity impacts of options is another notable deficiency
- Local Millfield impacts - Mount View Rd is proposed as a key construction route – the EIS has failed to properly examine the impacts it would cause and has not considered alternatives for construction in the Mt Baker area. This road is far from suitable to meet the construction task and should be rejected

Tim Paterson 23 September 2025

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