



24 September 2025

The Department of Planning, Housing
and Infrastructure

Contact: Chris Dwyer
Our Ref: DA 52/2025/10/1
Your Ref: SSI-70610456

Attention: Kurtis Wathen

Dear Kurtis,

**Request for Submission – Critical State Significant Infrastructure
Hunter Transmission Project (SSI-70610456)**

Thank you for the opportunity to make a submission on the Environmental Impact Statement (EIS) for the Hunter Transmission Project (HTP) proposed by EnergyCo.

Council has reviewed the following documents:

- Environmental Impact Statement, Hunter Transmission Project, EnergyCo, August 2025;
- Executive Summary, Hunter Transmission Project, EnergyCo
- Technical Reports 1-19 as lodged on the NSW Planning Portal

Summary of Submission

Cessnock City Council recognises the significance of the HTP at a State and national level and supports the project's objective to ensure energy security in NSW.

To achieve this objective we understand that impacts and disruptions to the local community and local infrastructure are necessary. It is Council's aim to identify these impacts and to work with both EnergyCo and the Department of Planning, Housing and Infrastructure (DPHI) to minimise and mitigate local concerns.

From our review of the EIS we identify three distinct areas of interest:

- Local road infrastructure upgrades and maintenance
- Construction support site and laydown areas
- Public Benefit Sharing framework

The EIS endeavours to address these concerns, however some additional information is required to enable Council to better understand the impacts. The requested information is itemised at the conclusion of this letter.

Assessment Framework

The project is Critical State Significant Infrastructure (CSSI) and is assessed under Part 5 of the NSW *Environmental Planning and Assessment Act 1979* (EPA Act).

The project is also a 'controlled action' relating to threatened species and communities, and Commonwealth land, as determined by the Minister for the Environment and Water under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Is it understood that wider environmental impacts arising from the proposal will be assessed in accordance with Schedule 1 of the Bilateral Agreement between the NSW and Commonwealth Governments, made under the EPBC Act, and that the project will be assessed under both Acts.

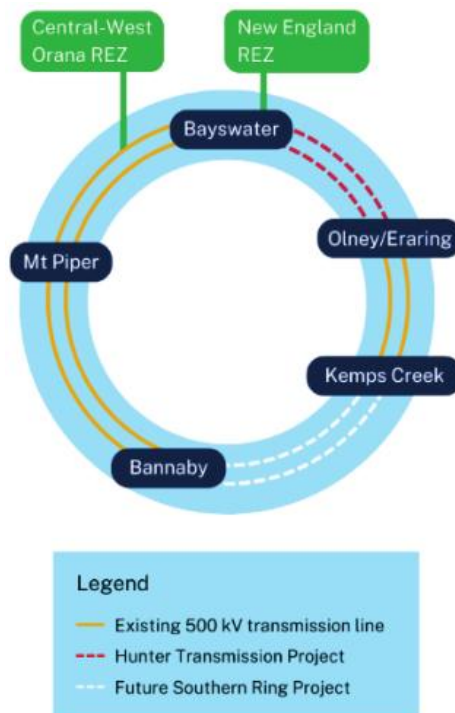
Cessnock City Council's review accordingly concentrates on the proposal's direct impact on our local community.

The Proposal

The HTP is within the Muswellbrook, Singleton, Cessnock, Central Coast and Lake Macquarie Local Government Areas (LGAs), running for approximately 110km between Bayswater Power Station in the north and the Olney State Forest in the south.

The HTP is identified as a Priority Transmission Infrastructure Project (PTIP) under the NSW *Electricity Infrastructure Investment Act 2020* (EII Act) because it is 'essential for energy security and avoiding breaches of the NSW Energy Security Target'.

The HTP will close the northern gap of the '500kV ring' by connecting Bayswater Power Station and a new switching station near Eraring in the Olney State Forest.



The HTP includes:

- A new overhead 500 kV double circuit transmission line of around 110 kilometres
- Two new switching stations (Bayswater South and Olney)
- Upgrades to the existing Bayswater and Eraring substations
- Adjustments and upgrades to existing transmission lines
- Property adjustment to facilitate access to transmission lines and switching stations
- Utility adjustments for the construction of the transmission network infrastructure
- Ancillary works to support construction including road upgrades, establishment of new access tracks and upgrades to existing access tracks, construction support sites (some with temporary worker accommodation), and other construction facilities such as laydown areas.

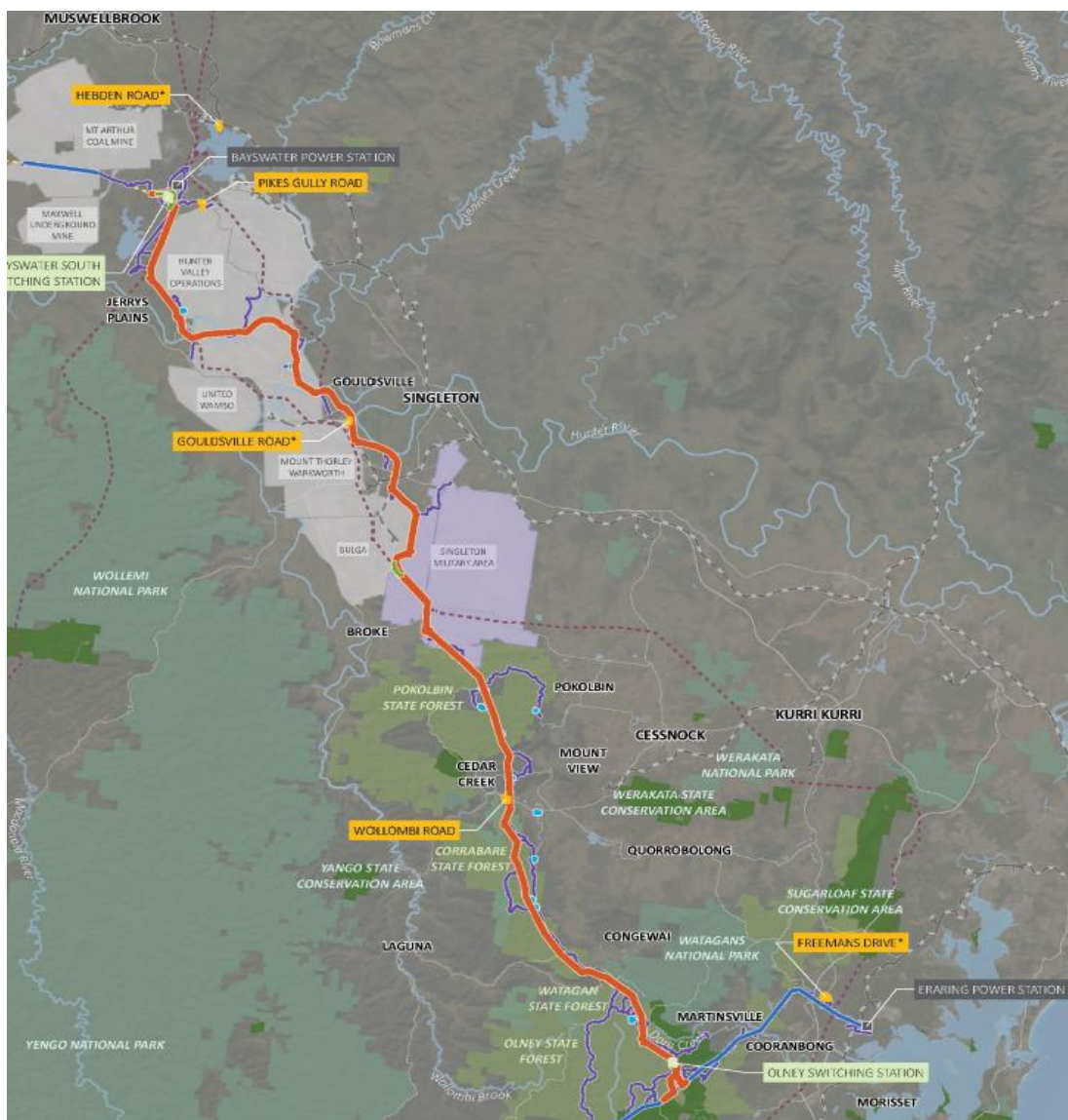


Figure 1: HTP Route

Local Infrastructure - Cessnock

Within the Cessnock LGA it is proposed to access the HTP from the Hunter Expressway through the centres of Kurri Kurri and Cessnock, and then by local roads and tracks to the construction site. During construction it is also proposed to establish a number 'laydown areas' and erect a temporary construction support site at Wollombi Road, Millfield.

Local Road Infrastructure

Routes

The project relies on the use of existing public roads during construction and operation (EIS Section 4.3.5 and Technical Report 4).

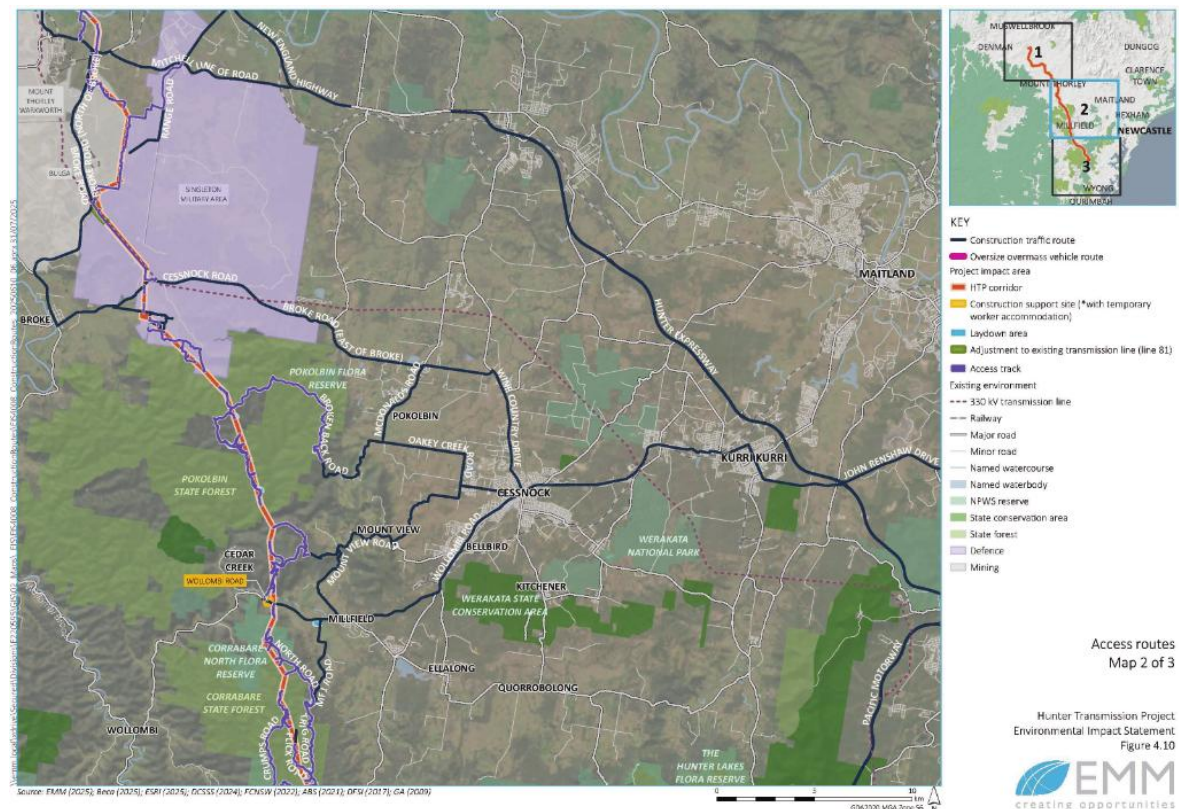


Figure 2: Local Road Access Routes

Nominated routes from Cessnock after passing through Kurri Kurri include Wollombi-Hayes Road; Wollombi Road-Mount View Road-Mount Baker Road; Wollombi Road-Mount View Road (Cessnock)-Oakey Creek Road. The nominated route from the Golden Highway includes Broke Road-McDonalds Road-Pokolbin Mountains Road-Broken Back Road (Figure 3).

The project then relies on existing and proposed forestry and Crown tracks.

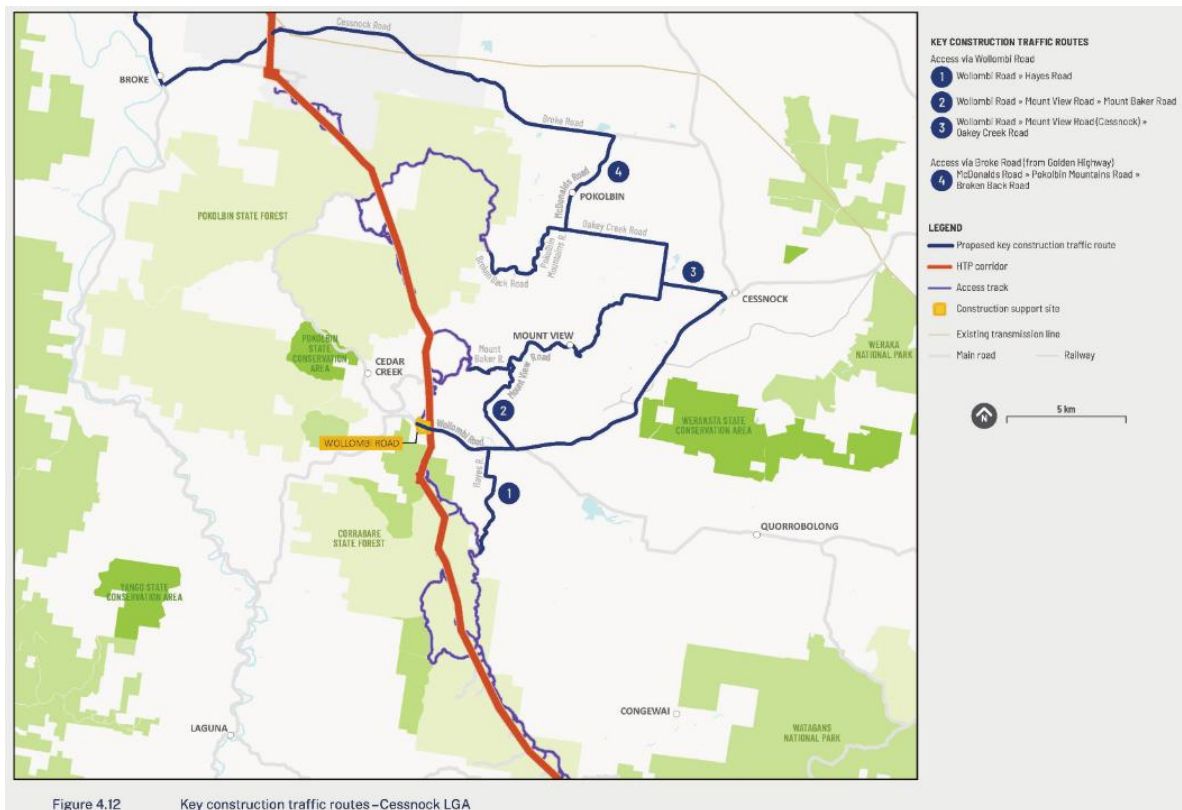


Figure 3: Local Road Access Routes - Detail

Upgrades

The proposed local road routes traverse a variety of grades and conditions, and impact not only the roads themselves, but also associated infrastructure including bridges, culverts, and drainage. The upgrading of some local roads including widening, and new intersection treatments are also proposed.

Nominated road upgrades are identified in Table 4.9 of the EIS and include:

Table 4.9 Proposed upgrades at existing public roads

Local government area	Road	Road classification (road owner)	Location	Works required
Cessnock	Hayes Road	Local (Cessnock Council)	Various sections between Wollombi Road and MF1 Road in Millfield	Widening for one lane movement for 19 m heavy vehicles with traffic control required
	MF1 Road	Local (Cessnock Council)	Various sections between Trig Road and Hayes Road in Millfield	Widening for one lane movement for 19 m heavy vehicles with traffic control required
	Mount Baker Road	Local (Cessnock Council)	Various sections between Mount View Road and Existing Track (Mount View) in Millfield	Widening for one lane movement for 19 m heavy vehicles with traffic control required
	Pokolbin Mountains Road	Local (Cessnock Council)	Various sections between McDonalds Road and Broken Back Road in Pokolbin	Widening for one lane movement for 19 m heavy vehicles with traffic control required

Nominated intersection upgrades are identified in Table 4.10 of the EIS and include:

Local government area	Intersection	Road classification	Location	Treatments required
Cessnock	Wollombi Road/access roads to the Wollombi Road construction support site	State/local	Millfield	- Reconfigured lane layouts for new access tracks and intersections with Wollombi Road - Reduced temporary speed limit required along Wollombi Road on approach to the access roads intersection
	Wollombi Road/Mount View Road (Millfield)	Regional/local	Millfield	Kerb adjustments at Mount View Road to widen for turning vehicles required
	Wollombi Road/Hayes Road	Regional/local	Millfield	Widening, partial land acquisition and culvert extensions on Hayes Road is required
	Wollombi Road/new access track	Regional/local	Millfield	- Localised intersection widening and culvert extensions on the access track for turning vehicles - A basic left turn and basic right turn intersection - A reduced temporary speed limit would be required along Wollombi Road on approach to the intersection with the new access track
	McDonalds Road/Oakey Creek Road/Pokolbin Mountains Road	Local/local/local	Pokolbin	Intersection requires widening for 2-way/2-lane heavy vehicle movements

Many of these roads and intersections are narrow, partially unsealed roads with shallow culverts. Although pavements are currently in a good to fair state, they are not suitable for regular heavy vehicle traffic from a design and safety perspective. Particular concern is raised with Cedar Creek Road, Hayes Road (Mf1 Road), Mount View Road and Pokolbin Mountains Road.

In the absence of preliminary road design the extent of works and resultant environmental impact of road widening and intersection upgrades are not able to be quantified.

Council recognises the proponent's intention to utilise *Roads Act 1993* approval mechanisms (i.e. s138) for these works at a later date, and the proponent has initiated preliminary discussions with Council to assist with road infrastructure investigation and procedures for future applications. This is supported to continue.

However given known constraints it is reasonable to assume that significant works including clearing, earthworks, and bridge and culvert upgrades may occur at some locations. These aspects of the HTP should be addressed at this stage of the development to identify significant environmental impacts and to avoid these issues arising at the s138 stage. In instances where no significant environmental impacts are identified, ongoing consultation during the CSSI approval process (as proposed in the EIS) and/or a condition requiring s138 approvals is appropriate.

Maintenance

The EIS notes that pre-construction assessment surveys and routine inspections will be completed prior to and during construction to ensure that routes are maintained to a safe standard during construction, and that where rectification works are required this will be done in consultation with Council.

The proponent has initiated discussions with Council on the framework for baseline data gathering (including dilapidation surveys), upgrade works, methods of proponent/Council communication and agreements on maintenance of assets during and post construction.

It is the expectation of Council that the proponent will be responsible for all costs associated with local road and associated infrastructure impacts for investigation, upgrade works, maintenance during construction, and maintenance during operation.

At this stage of the development it is considered appropriate to establish an agreed framework between the proponent and Council that includes (but not limited to) identification of specific assets that will be impacted; determination of the extent of investigation, design, and construction work needed, agreed road infrastructure base condition (dilapidation reports), standards to be achieved with any upgrade works, standards to be maintained during and post construction including end points*, methods of Council liaison, oversight and review mechanisms including hold points.

* Ongoing infrastructure maintenance costs are also addressed at the Local Developer Contributions section of this response.

Once this framework is established it should be identified and required in a condition of consent.

Route Alternatives

The EIS provides a detailed analysis of proposed routes including contemporary traffic and intersection counts, and advice that the preferred routes were developed in consultation with Council and TfNSW.

The routes pass through established local centres including Kurri Kurri and Cessnock itself, and pass by a number of sensitive land uses such as schools.

The EIS would benefit from an analysis of alternate routes that may have been considered and reasons they are not preferred. Particular reference is made to any alternate routes from the Hunter Expressway to Cessnock from the east (including Hart Road access), and any routes from the Hunter Expressway from the north (including Wine Country Drive access) to either Cessnock / Broke Road / McDonalds Road.

Associated infrastructure – bridges and culverts

Similar to comments on road impacts, there are limitations to advising on the structural capacity of bridges and culverts. Again the proponent has initiated preliminary discussions, but further information is required at this stage of the development in the form of a detailed analysis and design of any upgrades to bridge and/or culvert assets . To assist in this process, the following information is provided.

Across the five key construction routes there are 11 major culverts / bridges; and 93 minor culverts / water crossings. Significantly, two major culverts on Broke Road and the Mount View Road bridge will require further detailed inspections and a load assessment.

The reason this issue is requested to be dealt with at this stage and not by condition is that there are currently no formal load limits in place, and that previous applications on similar roads have been declined by Council due to axle load concerns.

Summary - Local Roads and Intersections

The HTP proposes the use of local roads for access during construction and operation. This presents risks to roads, bridges, culverts and drainage assets.

There are limitations to Council's consideration as the type of vehicles, load masses and configurations have not been confirmed. Once this information is available, a more in-depth assessment can be undertaken, particularly regarding the structural capacity of bridges and culverts and the suitability of the nominated routes for heavy vehicle haulage.

Additional information on impacts on local road infrastructure is required:

- *Details of road, bridge and culvert upgrades and identification of any significant environmental impacts*
- *Identification of specific infrastructure assets that will be impacted and determination of the extent of investigation, design, and construction work needed*
- *Identification of impacts upon sensitive land uses along the route including schools*
- *Framework for road infrastructure upgrades and ongoing maintenance and monitoring between Council and EnergyCo*
- *Alternate route analysis from the Hunter Expressway*

Laydown Areas

Numbers vary between sections and Figures within the EIS, however the following laydown areas have been identified:

- Broken Back Trail
- Hayes Road
- Trig Road
- Crumps Road
- Wollombi Forest Road

The EIS identifies the use of these areas as temporary staging, 'stringing', storage and plant/equipment setup areas, allowing flexibility in construction and to minimise the need for vehicle movements to and from the construction support sites. At completion of construction these sites would be returned to their existing land use.

Whilst specific detail on the number and location of all laydown areas does not appear to be available, an example of likely impacts is made regarding the Hayes Road, Millfield site (Figure 5).



Figure 5: Millfield Laydown Area

This site is adjacent to a heritage item (Millfield Cemetery) and is vegetated. Impacts on Millfield Cemetery are considered at Table 15.1 and 15.2 and vegetation clearing (Table 4.4) however no other information is available to determine impacts on this or other laydown area sites.

Additional information on the proposed laydown areas is required:

- *Confirmation of location of each laydown area location*
- *Details of:*
 - *vegetation clearing*
 - *access requirements and any road works*
 - *helipad operations (eg Wollombi Forest Road – Central Coast LGA)*
 - *waste management/site facilities*
 - *security arrangements (CCTV/fencing/lighting, etc)*
 - *rehabilitation to existing land use (revegetation, landscaping, etc)*
 - *timeframe and/or specific project milestones for removal and rehabilitation*

Construction Support Site – Wollombi Road

The HTP proposes five temporary construction support sites, one of which is located in the Cessnock LGA (Figure 6). The Wollombi Road ('A and B') construction support site is proposed west of Millfield on EnergyCo owned land.



Figure 6: Wollombi Road Construction Support Site

The EIS provides indicative uses as:

- Material, plant/equipment, chemical/fuel and waste storage
- Concrete batching, aggregate crushing, grinding and screening
- Maintenance facilities / workshops / lunchroom, offices, amenities
- Firefighting equipment
- Helipad/helicopter facilities
- Access and parking
- Potable water tanks
- Wastewater treatment plant

This site is both flood and bushfire prone, and is a major component of the construction of the HTP, however there is little to no detail within the EIS to enable an informed response.

Additional information on the proposed Wollombi Road A and B Construction Support site is required:

- Confirmation the site will not be used for temporary workers accommodation (the EIS does not identify the site as temporary workers accommodation)
- Confirmation and details of helipad/helicopter use (Technical Report 16 p35 does not identify the site as a helipad)
- Details of:
 - all building and structures
 - vegetation clearing
 - bushfire management and evacuation – site specific
 - flood impacts and management – site specific
 - access requirements and any road works, north and south (building on detail in Table 4.10)
 - on-site waste management
 - security arrangements (CCTV/fencing/lighting, etc)
 - rehabilitation to existing land use (revegetation, landscaping, etc)
 - timeframe and/or specific project milestones for removal and rehabilitation

Local Developer Contributions and Benefit Scheme

The size and scale of the HTP will result in the need for local supporting infrastructure and facilities both during construction and for its ongoing operation.

Attention is drawn to the National Guidelines: *Community Engagement and Benefits for Electricity Transmission Projects* (July 2024), which calls for the development of community benefit programs that reflect and respond to the specific impacts of major infrastructure projects, including cumulative impacts on local communities and infrastructure.

In this context, the levying of infrastructure contributions is not only appropriate but necessary, given the scale and likely impacts of the proposed development.

State and local road infrastructure

The movement of earth, vegetation and large, heavy construction and transmission components associated with the HTP is not only expected to impact Council's local road network but also State components of this network. A significant increase in construction worker traffic is also expected.

The primary access routes of Cessnock Road, Wollombi Road, Wine Country Drive, and Broke Road comprise a combination of regional, state, and local roads. Substantial government investment has already been committed to these routes:

- The federal and state governments are currently funding significant reconstruction works on Wollombi Road.
- Within the past decade, the full length of Broke Road (from Wine Country Drive to Harrigan's Irish Pub) was reconstructed using state government funding.

Given these existing investments, it is in the interests of both the federal and state governments to ensure that this infrastructure is protected. Appropriate contributions from the HTP are necessary to preserve the integrity of these assets and avoid undermining recent public expenditure.

Heavy Vehicle Haulage Levy

To address the accelerated wear on local roads caused by heavy vehicles associated with the construction phase of the development, Council recommends the application of a haulage levy, ensuring the HTP contributes fairly to the cost of maintaining and rehabilitating roads under Council's care and control, rather than shifting that burden to ratepayers.

In the *Cessnock City Wide Infrastructure Contributions Plan 2020* this levy is calculated with reference to Equivalent Standard Axles (ESAs), with a standard rate per tonne per kilometre. As part of this process proponents should provide haul route mapping, details of vehicle types, and estimated ESA loads.

Where vehicle weight is not known but the number and type of heavy vehicle movements are available, an alternative method may be to base the levy on the number of truck trips and the average ESA rating per vehicle.

Community Benefit Contribution

To ensure that the broader community shares in the benefits of the development, particularly given its status as Critical State Significant Infrastructure, Council also seeks a community benefit contribution.

It is noted that throughout the EIS and specifically within Technical Report 19 – Economic Impact Assessment that Benefit Sharing is contemplated by the HTP through the implementation of a benefits scheme and local workforce participation strategy. Recognition is also made for income and employment opportunities for local Aboriginal groups under the First Nation Guidelines to the value of 1.5% of the contract value of the project. These initiatives are fully supported.

The EIS also indicates an amount of \$50 million in funding that will:

- be provided to local Councils for strategic initiatives
- enhance recreational facilities in Pokolbin and Watagan State forests
- support payments to private landowners subject to visual impacts
- support local education and training initiatives for the local community; and
- be used to deliver other benefit-sharing initiatives for the local community

Council assumes that this amount is to be allocated across the five Councils, private landholders and other important sections of the community. If this is correct, it is Council's position that \$50 million is substantially less than that required for EnergyCo to meet its community benefit sharing obligations. This is compounded by the HTP affecting communities at different scales. It is Council's opinion that the Cessnock LGA bears the majority of impacts from the HTP.

We assume that the statement in Table 14 of the EIS that EnergyCo is 'expecting to commence consultation with relevant communities in 2026 to inform the design and delivery of the Community and Employment Benefit Program' is not premised on the baseline established in the EIS (ie \$50 million), but that this process will guide and inform actual requirements of each community. It is expected this will result in a larger baseline figure.

To assist DPHI in appreciating Council's approach, under normal circumstances Council would levy the development in accordance with Council's *Section 7.12 Levy Contributions Plan 2017*, which requires a contribution of 1% of the estimated development cost. While Council acknowledges that the CSSI framework grants discretion in determining local infrastructure contributions, the principle of consistency and equity across comparable developments should be upheld.

A recent example of a State Significant Development benefit sharing outcome is the Snowy Hydro Hunter Power Project (HPP) gas plant development. For the HPP the proponent was levied a Section 7.12 contribution that, although well below Council's standard rate, nonetheless reflects DPHI's recognition of the need for a local contribution mechanism.

While major infrastructure projects like the HPP and the HTP deliver substantial economic and energy system benefits at the national scale, they also impose real and measurable costs at the local level. Development contributions are a critical tool to ensure that these localised impacts are fairly addressed, and that host communities are not left to bear disproportionate burdens.

Council requests that DPHI levy appropriate infrastructure contributions, in line with both legislative intent and national guidelines. If the above approach(es) are not supported, alternative resolutions to the local benefit sharing are requested.

Additional information on the proposed local benefit sharing framework is required:

- *Confirmation that the proponent will apply the National Guidelines: Community Engagement and Benefits for Electricity Transmission Projects (July 2024) to the project,*
- *Confirmation that future consultation on community benefit sharing is not limited to line items and baseline figures presented in the EIS*

Continued community consultation

The proponent is encouraged to continue regular community consultation meetings and workshops with local community groups, Councillors and Council staff. Formalisation of community consultation initiatives should be made through the imposition of conditions of consent identifying timeframes, participants, themes and expected outcomes of effective community consultation.

Summary

To enable a comprehensive submission to the EIS, additional information is requested as detailed in this letter, and summarised as follows:

- *impacts on local road infrastructure;*
- *details of proposed laydown areas;*
- *details on the proposed Wollombi Road A and B Construction Support site; and*
- *confirmation on the proposed local benefit sharing framework*

It is expected that Council will be afforded an opportunity to comment on the additional information and make further submissions to the EIS if required.

It is also expected that continued and ongoing separate discussions will be initiated by EnergyCo to discuss the above items with Council and to work toward agreed outcomes, including appropriate conditions of consent.

If you require any further information, please do not hesitate to contact Council's Executive Planner, Chris Dwyer on 02 4993 4254 or via email chris.dwyer@cessnock.nsw.gov.au.

Yours faithfully



Peter Chrystal
Interim General Manager