



24 March 2026

The Department of Planning, Housing
and Infrastructure

Contact: Chris Dwyer
Our Ref: DA 52/2025/10/2
Your Ref: SSI-70610456

Attention: Kurtis Wathen

Dear Kurtis,

Request for Comment – Response to Submissions and Project Amendments

Critical State Significant Infrastructure - Hunter Transmission Project (SSI-70610456)

Thank you for the opportunity to comment on EnergyCo's Response to Submissions (RTS) and project amendments for the Hunter Transmission Project.

Cessnock City Council has reviewed the information including EnergyCo's *Submissions Report, February 2026* and *Amendment Report February 2026* inclusive of Appendices noting that EnergyCo has proposed amendments to the project. The contracted timeframe which is afforded Council to review both the RTS and amendments is not adequate to enable a detailed assessment so within the timeframes provided, Council provides the following response:

Response Summary

The RTS acknowledges Council's submission of 24 September 2025 and responds to the issues raised at section 7.1 of the *Submissions Report*.

Three distinct areas of interest were raised in our submission:

- local road infrastructure upgrades and maintenance
- construction support site and laydown areas
- public Benefit Sharing framework

Whilst these items are addressed in the *Submissions Report*, proposed amendments to the Project mean that some items are addressed through the *Amendment Report*.

Amendments and refinements to the project are acknowledged, however the following areas of interest require further detail and ongoing liaison with Council and the community to enable a detailed appreciation of impacts and opportunities to mitigate those impacts:

- local road infrastructure upgrades and maintenance
- temporary Workers Accommodation
- Public Benefit Sharing framework

Council will continue to work with EnergyCo and the Department to progress these issues.

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Infrastructure

The *Amendment Report* outlines several refinements to the exhibited project, including adjustments to transmission line alignment, changes to access tracks, updates to construction support sites and minor adjustments to the project impact area. With the exception of the addition of Temporary Workers Accommodation, these amendments appear to be design refinements rather than significant changes to the overall project footprint within the Cessnock LGA.

Local Road Infrastructure

A high-level review has been undertaken focussing on potential implications for Council infrastructure including roads, traffic, bridges, culverts and drainage systems.

The amendments do not significantly change the key issues previously identified in Council's original response. The reliance on existing public roads and infrastructure for construction access remains an important consideration.

Construction activities will rely on sections of the existing local road network, which include numerous culverts, drainage crossings and other infrastructure assets.

Whilst the *Amendment Report* identifies road widening and intersection upgrades, there is limited detail regarding associated infrastructure such as drainage structures, bridges and culverts.

Some existing culverts and drainage structures may not have sufficient capacity or structural capability to support upgraded road conditions or construction activities. These assets may require further assessment and potentially upgrades or replacement.

Council expects ongoing consultation with EnergyCo and the Department to ensure local road infrastructure is adequately measured and impacts adequately defined and mitigated to Council's satisfaction.

Flooding and Drainage

The Flood Impact Assessment Addendum Technical Report by Lyall & Associates, February 2026 (Appendix L) provides updated information on potential flood behaviour within the amended project area.

Construction activities such as access track upgrades, ancillary works and temporary facilities may interact with existing drainage paths and flood-prone areas. Council requests that the Department consider the following in its assessment. These considerations are consistent with matters identified in the original response.

- Construction works should avoid obstructing existing drainage paths and watercourses.
- Drainage associated with access tracks and road upgrades should maintain existing flow paths.
- Culvert extensions or upgrades associated with access works should maintain the hydraulic capacity of the drainage network.

- Where access routes are located within flood-affected areas, appropriate flood immunity should be considered to maintain safe and reliable access during construction.
- Appropriate flood and water management measures should be implemented during construction to avoid impacts on surrounding infrastructure.

Asset Condition and Pre-Construction Considerations

The *Amendment Report* does not clearly address pre-construction asset condition or dilapidation assessments.

Given the expected use of local roads during construction, Council requests that pre- and post-construction inspections of affected infrastructure be undertaken. This will assist in documenting the condition of roads, culverts and drainage assets and ensure any impacts from construction activities are identified and addressed.

Traffic and Transport

The revised Traffic and Transport Impact Assessment by SCT Consulting, February 2026 (Appendix H) indicates that the increase in traffic volumes during construction is expected to be minor and unlikely to significantly impact the capacity of the State, regional or local road network within the Cessnock LGA.

Council will continue to work with relevant stakeholders to support safe and effective traffic management during the construction phase.

Summary - Infrastructure

From a local infrastructure impact perspective, the amendments do not significantly change the infrastructure issues previously identified in Council's original response. Matters relating to the condition and capacity of bridges, culverts and drainage infrastructure remain relevant.

Detailed information on construction vehicle types, loads and transport arrangements have not been confirmed. Once this information becomes available, further assessment may be required to confirm the suitability of nominated routes and the capacity of bridges and culverts.

Temporary Workers Accommodation

The project now proposes Temporary Workers Accommodation at the Wollombi Road Construction Support Site. It is understood that this facility will cater for a maximum of 300 workers during construction.

Council does not have the benefit of a specific Policy for Temporary Workers Accommodation of this scale, and has not been afforded adequate time to assess this amendment in detail. However, the following high level comments are made to assist the Department in its assessment.

As previously identified the site is remote, is flood prone and bushfire prone and is not serviced by reticulated water or sewer. Whilst the benefits of centralizing the workforce are apparent in terms of easy access by them to the construction site, other impacts may include the dilution of local employment opportunities, environmental impacts from an intensification of wastewater facilities, increase in light vehicle movements, increase in lighting and security

arrangements and noise, all of which are likely to impact the environment and nearby village residents.

Decommissioning impacts from an environmental and social perspective are also critical to consider to ensure the location is left in the same, if not better, condition following the project ceasing. This would include ancillary infrastructure such as waste water treatment facilities, car parks, water supply facilities, etc. It is not clear that this is an objective of EnergyCo at this stage.

Associated with public benefit comments below, a detailed analysis of opportunities to provide tangible local community legacy from the project should also be undertaken to address reuse of infrastructure post construction. Of particular interest is the opportunity to re-use residential accommodation within the Cessnock community. Given the known constraints of the Wollombi Road site, it does not lend itself to a permanent residential outcome. If reuse of residential accommodation was feasible, it would be best placed in other more suitable locations in the Cessnock LGA.

Although EnergyCo raise the difficulty in guaranteeing aspects of the project including rehabilitation and facility reuse due to contractor unknowns (ie the construction contract has not been awarded yet), a level of certainty for Council and the community through the EIS process and at this stage, is required.

Public Benefit Sharing Framework

It is noted 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 in the Hunter-Central Coast region”*. Until this consultation occurs, Council refers the Department to our previous response, with the added commentary below.

It is expected that any scheme address:

- Community benefit: both during and post project, this may include such considerations as supporting local groups, organisations and initiatives. Council is willing and capable of assisting with connecting the proponent with local community groups and organisations
- Seeking to employ local residents where possible, noting specific skillsets may not always be able to be locally targeted
- The project should not disbenefit the local community during its lifespan or following
- Where appropriate and possible, infrastructure associated with the temporary worker accommodation should be considered for ongoing community benefit following the project ceasing.

There appears to be an error in reference to \$50 million for local council strategic initiatives and other benefit sharing initiatives in Technical Report 19 – Economic impact assessment of the EIS. EnergyCo has stated in the RTS that this figure “has not yet been determined”.

Summary

The RTS and amendment documentation further delineates and refines the project. There are a number of matters that Council consider to be unresolved at this point due in the main to lack of certainty and detail.

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

Ongoing liaison between EnergyCo, the Department, and local Councils is recommended.

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

A handwritten signature in black ink, appearing to read 'Peter Chrystal', with a stylized, cursive script.

Peter Chrystal
Interim General Manager