

17 March 2026

Department of Planning, Housing, and Infrastructure

Dear Sir/Madam

Subject SSI-70610456 - Hunter Transmission Project - Advice on amendment report

Lake Macquarie City Council (LMCC) staff have reviewed the amendment report and provide the following comments.

The Department of Planning, Housing, and Infrastructure is requested to give due consideration to the following matters in the assessment and determination of the State Significant Infrastructure proposal.

Temporary workers' accommodation site Freemans Drive

Subject to the site-based constraints being satisfied appropriately, as identified throughout this response, Council staff support the temporary workers' accommodation site at Freemans Drive. The use of the site for permanent housing is not supported, as the site location is zoned for rural and conservation use, which does not align with permanent housing of the proposed scale, and does not align with Council's objectives to support in-fill housing as a first priority.

Given the substantial investment required to prepare and operate the site, Council recommend the proponent investigate opportunities to reuse the built structures, particularly dwellings, to provide benefits to the Lake Macquarie community following completion of the project. This could include relocating the dwellings to other sites to assist with Council's strategic objectives for diverse and affordable housing.

Council staff have met with the applicant on several occasions since the original application submission and the submission of the amendment report, and have identified this matter as an ongoing issue. This matter continues to remain unresolved.

Recommendation

- The proponent should investigate opportunities to reuse the built structures, particularly dwellings, to provide benefits to the Lake Macquarie community following completion of the project.

Flora and Fauna

The amended report includes minor changes to the alignment of the Hunter Transmission Project, although there are no significant changes to the project within the Lake Macquarie Local Government Area.

The updated Biodiversity Development Assessment Report (BDAR) indicates serious and irreversible impacts (SAIL) on seven plant species and seven animal species across the project. Of these, six of the plant species and all these animal species occur within Lake Macquarie. This is a concern.

Comments made in Council's earlier submission remain relevant. Of the matters identified previously, the following matters have not been satisfactorily addressed in the EIS:

- Quantification of the extent of loss of habitat regional connectivity arising from direct and indirect impacts associated with the project.
- Inclusion of a draft of the Strategic Offset Delivery Agreement as part of the project EIS.

Council staff have met with the applicant on several occasions since the original application submission and the submission of the amendment report, and have identified this matter as an ongoing issue. This matter continues to remain unresolved.

Recommendation

The following recommendations are made following a review of the updated BDAR:

- Update the assessment of the 14 species identified as having potential for serious and irreversible impacts to address the likelihood, risks, and population impacts of these species. Avoidance of impacts to SAIL species should be reconsidered, together with re-evaluation of the adequacy of avoidance and provision of proposed offsets.
- Consideration should be given to additional field surveys to provide adequate certainty regarding impacts to the identified SAIL species.
- The proposed biodiversity offset strategy is based on an undefined Strategic Offset Delivery Agreement and a generic Hunter Conservation Investment Strategy 2025, with little detail and no specific commitments or required conservation standard to be achieved. This must include specific provisions for species subject to SAIL impacts.

Traffic and transport impact

The amended report indicates further sight distance assessments will be undertaken during detailed design, relevant to the following intersections:

- Martinsville Road/Freemans Drive
- Martinsville Road//Pringles Road
- Martinsville Road/Watagan Road
- Watagan Forest Road/Martinsville Hill Road
- Freemans Drive/Mount Nelinda Road
- Freemans Drive/Mount Faulk Road
- Freemans Drive/Newport Road

- Newport Road/Gradwells Road

Council staff have met with the applicant on several occasions since the original application submission and the submission of the amendment report, and have been working through these matters collaboratively.

Recommendation

- Several intersections within Lake Macquarie have been identified as potential construction routes. Some of these areas are within built up suburban areas and consideration to safety measures and further information is required to ensure traffic and vehicle access has been adequately considered in addition to pedestrian infrastructure. This includes:

- intersection of Alton Road/Freemans Drive

The intersection of Alton Road/Freemans Drive is located within the Cooranbong town centre, a zone of increased pedestrian and cyclist activity due to nearby shops, schools, public transport stops, and community facilities. The existing cycle lane is narrow on the road shoulder.

Traffic Management Plans must be submitted outlining the safe driving practices and measures at built up areas.

- intersection of Martinsville Road/Freemans Drive

Lake Macquarie City Council currently holds a Federal Active Transport grant that includes scope for safety improvements at this intersection, required to be delivered in 2028–29 or earlier.

- intersection of Martinsville Road/Pingles Road

Detailed design is required to demonstrate how SISD will be achieved with proposed treatment.

- intersection of Martinsville Road/Watagan Road

Detailed design is required to demonstrate how SISD will be achieved with proposed treatment.

Provide painted median treatments on the widened shoulders to accommodate heavy vehicle swept paths, while visually narrowing the intersection to influence light vehicle trajectories and promote safer operating speeds.

Following construction, EnergyCo is responsible for reinstating a narrower intersection to reduce Council's long-term asset management burden and enhance safety for all road users.

- intersection of Watagan Forest Road/Martinsville Hill Road

Traffic Management Plans must be submitted outlining the proposed reduced speed limit. TfNSW approval is required for the reduced speed limit.

- intersection of Freemans Drive/Mount Faulk Road
Detailed design is required to demonstrate how SISD will be achieved and intersection priority formalised.
- intersection of Freemans Drive/Newport Road
Detailed design is required to demonstrate how SISD will be achieved with proposed treatment
- intersection Freemans Drive/Mount Nelinda Road
Detailed design is required to demonstrate how SISD will be achieved and intersection priority formalised.
- intersection Freemans Drive/temporary workers' accommodation site
Detailed design is required to demonstrate how SISD will be achieved and intersection formalised.
- A detailed intersection safety assessment is required of each of the above intersections, and road upgrades, and pedestrian safety, using Safe System Assessment.
- A road safety audit report should be submitted for the proposed construction route.

Furthermore, the following recommendations from the EIS submission are noted:

- Due to the impact of the project on Council's required timeframes for implementing safety improvements at the intersection of Martinsville Road/Freemans Drive, the applicant should take full responsibility for designing and constructing the upgraded intersection to:
 - accommodate the movement of heavy vehicles necessary for the transmission line project
 - incorporate Council's requirements for safe and accessible pedestrian and cycling crossings
 - ensure seamless integration with Council's planned shared paths on either side of the intersection, which must directly connect into the upgraded intersection layout.

This recommendation should be considered with respect to the comments provided above.

- If the project is supported, Council recommends conditions of consent be imposed requiring:
 - Upgrades must be designed to cater for all heavy vehicles expected to be utilised in the construction and operational phase of the project.
 - Upgrades must be designed to include provision for pedestrians, cyclists and public transport.
 - All permanent parking areas are designed in accordance with AS2890.

- Where Council is the road authority, submission of a Public Works Certificate application under S138 of the *Roads Act 1993* (this can be made via Council's website).
- Application must be made for approval to use planned haulage routes in Lake Macquarie before operation.
- Application must be made for approval of traffic management plans where Lake Macquarie City Council is the road authority.
- Following construction, the applicant should reinstate a narrower intersection of Martinsville Road/Watagan Road to reduce Council's long-term asset management burden and enhance safety for all road users.

Social impact

An addendum to the social impact assessment has been submitted.

The amended report addresses a new social impact assessment guideline that has been released since the EIS submission was completed.

Further, the project has since been amended and includes changes to the arrangement at the Eraring substation, changes to intersection at Martinsville Road and Freemans Drive, and changes in Forestry areas to minimise certain flora and fauna impacts.

As a result of these changes and in light of the amendment report:

- It is understood the changes at Eraring are localised within the existing power station site and therefore will not have negative social impacts to our community.
- It is understood the changes at Martinsville Road and Freemans Drive are within the local road network and are being coordinated with Lake Macquarie Council, due to Council have future proposed road works at this location, and
- It is understood changes to some laydown areas and construction areas have been amended in the State Forest areas to better avoid key flora and fauna species.

Recommendation

- To address the residual impacts, the recommendations of the social impact assessment should be adopted in any conditions of consent. This includes a social impact management plan, community engagement strategy, complaints management system, and temporary working management plan. This aligns with previous recommendations made by Council.

Visual impact

The amended report reflects the amended proposal however no additional viewpoints have been included to address the broader key locations previously requested.

Council's previous submission to the EIS identified concerns regarding the visual impact assessment submitted as follows:

- *Further visual assessment should be undertaken of whether and to what extent vegetation clearing and transmission towers will be visible from the lake, ridges*

around Morisset, the M1 Motorway, and other locations in the Lake Macquarie LGA. This should be investigated further to determine visibility and potential project changes that could limit cleared vegetation on hilltops and ridges.

- *Two viewpoint assessments within the Lake Macquarie LGA show the proposal to have low, to negligible impact, due to the towers being screened by existing vegetation outside the project area. However, these viewpoints were located within 400m of the towers and therefore do not demonstrate the broader potential impact associated with the permanent vegetation clearing, which is likely to be visible from public areas.*
- *The methodology used to assess visual impacts focuses primarily on areas within 1.625 km of the corridor and visual assessment at private residences. Cumulative visual assessment only considers other development projects and not potential long distance and aerial visual impacts.*
- *Vegetation clearing in the Watagan Mountains and the coastal escarpment mountains (described as LC2 Forested Hills) has the potential to be visible for long distances (10 – 20+ km) and has not been assessed. Significantly, this is where the largest number of people live and travel, and where the visual impacts of the project may be highest.*

The visual study area adopted extends approximately 5 km from the disturbance area. Given the elevated ridgeline location of parts of the corridor within the Watagan escarpment, vegetation clearing, and transmission infrastructure may be visible over considerably longer distances. As such, the broader visual catchment from the Lake Macquarie coastal plain remains unclear.

Section 8.2 – *Summary of landscape character and visual mitigation measures* identifies that a Landscape Character and Visual Impact Management Plan (LCVIMP) will be prepared as part of the project environmental management strategy at the detailed design stage. However, the scope of the proposed LCVIMP does not appear to include consideration of potential visual impacts at a broader landscape scale or further assessment of viewpoints beyond the immediate study area.

Council staff have met with the applicant on several occasions since the original application submission and the submission of the amendment report, and have identified this matter as an ongoing issue. This matter continues to remain unresolved.

Recommendation

- Identify and assess potential impacts to highly visible locations, including the undertaking of a further visual impact assessment of long-distance visibility of vegetation clearing associated with the project from the Lake Macquarie coastal plains, M1 Motorway and the lake.
- Identify mitigations measures that acknowledge the broader landscape viewpoints and longer-distance visual impacts, to be considered as part of the LCVIMP

Waste management

The project acknowledges waste management plans will be put in place. It is unclear as to whether Council waste services will be required for the project, particularly in relation to the temporary workers' accommodation sites.

Recommendation

- Where it is intended to utilise Council's waste services, further consultation should be undertaken with Council's waste collection services team. Where this can be supported, contracts to engage Council services are likely. This aligns with previous recommendations made by Council.

Aboriginal heritage

The site is affected by the Lake Macquarie Sensitive Aboriginal Cultural Landscape in some sections of the proposal and also includes known Aboriginal sites.

An Aboriginal cultural heritage assessment addendum report has been provided to support the amended proposal.

Amended mitigation measures have been included in the amended proposal, which are in accordance with the aboriginal cultural heritage assessment.

Recommendation

- The recommendations of the Aboriginal cultural heritage assessment report and addendum should be implemented. This aligns with previous recommendations made by Council.

European heritage

A heritage impact statement has been provided with the project and includes mitigation and management measures.

The amended impact assessment to local heritage items and potential heritage items is noted.

The addendum considers the amended proposal and any potential additional impacts and provides recommendations which have been included in the amended impact assessment.

Recommendation

- The recommendations of the heritage impact statement report and addendum should be implemented.
- A copy of the historic heritage management plan, as well as copies of any required archival reports or Archaeological Research Design and Excavation Methodology (ARDEM) for items within the Local Government Area should be provided to Council.
- This aligns with previous recommendations made by Council.

Stormwater management

The development may have stormwater runoff impacts from track and road upgrades, and any infrastructure with a permanent roof/gutter system.

It is acknowledged that due to the scale of the project, limited detail is available regarding the specific stormwater management required.

The amended report identifies several minor amendments to the scope and extent of works previously proposed within the Environmental Impact Assessment submission. For Lake

Macquarie, the most notable change is an increased construction footprint surrounding the Eraring Power Station.

The report incorporates Council's recommendations regarding minimum floor level requirements for the proposed temporary workers' accommodation on Freemans Drive, specifying a minimum finished floor level 0.5m above the 1% AEP flood event, with all facilities to be located outside the identified flood extents.

The assessment also outlines changes to flood behaviour in the vicinity of the Eraring Power Station and confirms that several construction areas including key intersections, are subject to flooding.

Recommendation

- Council recommends the project is designed to provide appropriate stormwater management.
- Conditions of consent should be imposed requiring detailed stormwater management design to be provided. This relates to elements of the project such as track and road upgrades, and any infrastructure with a permanent roof/gutter system.

Lake Macquarie's Development Control Plan includes a Drainage Design handbook that can be utilised by designers for any permanent structures. For all road related infrastructure, reference should be made to Austroads and Lake Macquarie's Engineering Design Guidelines (where Council is the road authority).

- Where watercourses may be impacted by stormwater discharge off new infrastructure, advice and approval may be necessary through Natural Resource Access Regulator (NRAR).
- A Construction Environmental Management Plan (CEMP) must be prepared to address flood-related risks, mitigation measures, and procedures for all construction areas affected by flooding.
- Additional detailed flood modelling will be undertaken to assess the impact of proposed road and intersection upgrades on flood behaviour as the project progresses into more detailed design. This information must be provided to Council for review and input when available.
- This aligns with previous recommendations made by Council.

Development contributions

Council has a new 7.11 development contributions plan (adopted since previous review of the project), where the development may be subject to development contribution levies.

If the project is supported, Council recommends consideration be given to non-residential traffic generation impacts and haulage levy to mitigate impacts for local roads.

Recommendation

- If the project is supported, Council recommends consideration be given to non-residential traffic generation impacts and haulage levy to mitigate impacts for local roads.
- This aligns with previous recommendations made by Council.

Should you require further information, please contact the undersigned on 0407 621 697 or by e-mail on dcharris@lakemac.nsw.gov.au

Yours faithfully

A handwritten signature in black ink, appearing to read 'D. Harris', with a stylized flourish at the end.

Dayne Harris

Manager Assets

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