

Council Reference:

24 September 2025

Energy Corporation of New South Wales
GPO Box 5469
Sydney
NSW 2001

Dear Sir/Madam,

Singleton Council - Response to Hunter Transmission Project Environmental Impact Statement Public Exhibition

Singleton Council acknowledges receipt of the Environmental Impact Statement (EIS) for the Hunter Transmission Project (HTP), currently on public exhibition. The HTP is identified as a critical State significant infrastructure project, vital for New South Wales's energy security and transition to renewable energy.

Singleton Council acknowledges that, as Critical State Significant Infrastructure, the Minister for Planning and Public Spaces is the consent authority for the Hunter Transmission Project.

While recognising the strategic importance of this project, Singleton Council, on behalf of its community, has thoroughly reviewed the EIS to understand and address the significant local impacts anticipated within the Singleton Local Government Area (LGA).

The Singleton LGA is a key area for the HTP, encompassing substantial portions of the project impact area, including agricultural lands, mining operations, State forests, and the Singleton Military Area. This submission outlines Council's concerns regarding potential impacts during both the construction and operational phases of the project, drawing upon the assessments provided in the EIS and technical reports.

Council advocates for robust mitigation measures, ongoing transparent consultation, and a meaningful benefit-sharing program to ensure the long-term well-being of our community.

Council has a process of providing preliminary submission responses to requests for advice, pending endorsement of the submission at a subsequent Council meeting. It should be noted that amendments to council's submission, or a subsequent submission, may occur as a result of this process.

Councils' comments on specific aspects of the EIS are below:

1. Traffic and Transport Impacts**a. Construction Traffic Volumes and Routes**

Council notes that several construction access routes and intersections within the Singleton LGA have been identified for use, including Lemington Road, Archerfield Road, Gouldsville Road, Long Point Road West, Comleroi Road, and sections of the Golden Highway and Putty Road. These routes already carry significant heavy vehicle volumes associated with mining and industrial activity.

Council has significant concerns about the cumulative impacts on the local network during the peak construction years (2027–2029), when a number of other major projects are also expected to be underway. The cumulative impacts on the local network must be considered.

b. Road Safety and Management of Stringing Works

Council notes the proposal to undertake stringing works across Putty Road and Cessnock Road, with traffic stoppages proposed to be limited to 5–10 minutes and not more than six times per day. Council requires assurance that these works will be scheduled outside of peak mine shift-change periods to avoid undue disruption.

For example, the Hunter Valley Continued Operations Project proposes to relocate Lemington Road as part of its Project. Should the amended project obtain approval, the realignment timing for Hunter Valley Operations and use of the road for the Hunter Transmission Project are likely to coalesce.

For local roads such as Lemington Road and Gouldsville Road, Council requires that traffic control measures be developed in consultation with Hunter Valley Operations, Council and local residents to ensure continued safe access for rural properties and emergency services.

c. Cumulative Impacts

Council notes the TTIA identifies overlap with several large-scale projects, including the HVO Continuation Project, Bowmans Creek Wind Farm, and Maison Dieu Solar Farm. Cumulative impact mitigation will be critical to ensure serviceability of roads for local residents, emergency services and other road users. How each project will assess and determine responsibility for wear and tear is an important consideration.

Council emphasises that cumulative traffic impacts must be addressed through coordinated planning across proponents to ensure the local road network is not subject to unacceptable strain.

d. Road Upgrades, Dilapidation and Maintenance

Where construction traffic contributes to accelerated deterioration, EnergyCo must be responsible for funding appropriate remediation works. Any local or regional road upgrades associated with the project should be clearly defined, with agreed timing, design standards, and funding responsibilities in place prior to construction commencement.

Council requires that all roads within the Singleton LGA proposed to be used for project construction traffic be subject to pre- and post-construction dilapidation surveys.

e. Heavy Vehicle and OSOM Movements

Council notes the Traffic and Transport Impact Assessment identifies Over Size Over Mass (OSOM) movements through Singleton township and along the New England Highway, with reliance on the completion of the Singleton Bypass to avoid high-risk pinch points.



Council strongly supports this approach and requires confirmation that OSOM movements will not be scheduled through Singleton's CBD prior to the bypass being operational.

f. **Ongoing Engagement**

Council acknowledges previous project briefings (June 2024, November 2024, April 2025, June 2025).

Council requests ongoing structured engagement which should include technical-level workshops with Council staff focusing on traffic management plans, haulage routes, and road condition monitoring, to ensure appropriate local input into the planning and management of project impacts.

2. Temporary Worker Accommodation

Council notes that the EIS includes a proposed temporary worker accommodation facility at Gouldsville Road within the Singleton LGA, with a capacity for approximately 180 workers. We acknowledge EnergyCo's commitment to providing this accommodation to reduce pressure on local housing markets and its "Hunter-first procurement and employment" commitments, which align with Council's desire for local economic benefit.

However, Singleton Council has drafted a "Construction Workers Accommodation Policy" (Policy) which outlines clear guiding principles for the location, assessment, establishment, and management of such facilities within our LGA. We urge EnergyCo to ensure the proposed Gouldsville Road facility and its management plans fully align with, or adequately address, the requirements and objectives of this Policy. This draft Policy is currently on exhibition.

Council's review of the EIS regarding worker accommodation at Gouldsville Road identifies several areas where further clarification, commitment, or alignment with our policy is required:

a. **Site Location and Suitability (Flooding and Zoning)**

- i. **Flooding:** Council's draft policy explicitly states a preference for sites "Not located on the flood plain". The EIS, in contrast, identifies the Gouldsville Road construction support site as being "affected by local catchment flooding" with inundation expected during storm events more frequent than a 10% AEP. While the EIS suggests construction activities would generally have a minimal effect on flood behaviour for design storms up to 1% AEP, Council requires a detailed flood risk management strategy specific to the temporary worker accommodation structures, demonstrating consistency with Council's Floodplain Risk Management Manual and Local Flood Plan.

Council requests further information on how personnel and assets will be protected, and how the temporary nature of the facility aligns with flood-prone land management.

- ii. **Zoning:** Council's draft policy prioritises locations within existing Strategic Growth Areas, preferably zoned residential (R1 - General Residential' or R2 - Low-density Residential). The Gouldsville Road site is located in an area zoned RU1 – Primary Production.

Although the HTP is critical State significant infrastructure, overriding local zoning, Council seeks robust justification for the selection of a RU1



site over preferred residential zones and how this aligns with the long-term land-use objectives for primary production land.

b. Infrastructure Provision and Servicing

- i. **Water and Wastewater:** Council's draft policy promotes access to reticulated sewer/onsite sewer management systems and that infrastructure should be an "extension of existing servicing, to prevent isolated and costly service arrangements". The EIS states that the Gouldsville Road facility will be "fully self-contained" with a "water treatment plant," but also that wastewater (including sewage) would be "transported by an authorised and appropriately licensed wastewater contractor to an appropriately licensed facility for treatment and disposal". This approach of offsite transport for wastewater does not align with Council's preference for integrated or extended reticulated systems.

Council requires a detailed water/sewer servicing strategy consistent with our adopted Engineering Standards and discussions with Council's Manager Water and Sewer to confirm the long-term implications and costs associated with this servicing model.

- ii. **'Wet Mess' Facilities:** Council's draft policy explicitly states it "will not accept an application that includes a 'wet mess'" and supports a 'dry mess facility to encourage workers to use local retail and hospitality services. While the EIS notes "food and catering" facilities at the accommodation, it does not explicitly clarify if this constitutes a 'wet mess'.

Council seeks explicit confirmation from EnergyCo that the food and catering services will operate as a 'dry mess' in accordance with our policy, to maximise local economic benefits.

c. Long-Term Legacy and Community Integration

- i. **Repurposing:** Council's draft policy emphasizes the potential for Construction Workers Accommodation to provide a "long-term legacy" by being repurposed for broader community housing needs (e.g., short-term rentals for industry diversification, crisis services, essential workers) following construction. The EIS, however, states that "Future use of temporary worker accommodation following completion of construction is outside the scope of the EIS". This divergence is a significant concern.

The current NSW Guidelines for Construction Workers Accommodation (May 2025) state that amendments to the State Environmental Planning Policy (Housing) 2021 are designed to promote temporary housing, that must be removed once it is no longer required. In general, all buildings and movable dwellings should be removed from the land after 2 years of being installed. However, there may be situations where it is appropriate for construction workers accommodation to remain beyond this timeframe. For example, if the construction phase of a development is longer than 2 years. In these circumstances, construction workers accommodation and related structures can remain on site for longer, depending on local council approval.

What this effectively means is that use of temporary workers accommodation following the completion of construction would require a subsequent approval from Council. However, the Housing SEPP provides that



development consent may be granted to development where all moveable dwellings and ancillary buildings will not be removed after 2 years if the consent authority is satisfied it is appropriate in the circumstances

Council's preference is that the matter of construction workers accommodation be dealt with within the Critical State significant development approval process to avoid delay and the local approval pathway.

Council requests EnergyCo to engage proactively with Council on potential repurposing plans for the Gouldsville Road facility, or to identify other possible locations for the Construction Workers Accommodation, to align with our draft Policy and Local Housing Strategy and contribute to addressing identified housing gaps.

- ii. **Community Services:** While the EIS proposes self-contained facilities to "minimise reliance on surrounding health and social infrastructure", Council's policy aims for "no net impact to existing locally provided services" and encourages the use of available community services.

Council seeks further detail on how EnergyCo will actively encourage workers to engage with local businesses, health, education, and sports services to ensure community integration and support, rather than merely avoiding reliance.

d. Noise Impacts and Worker Conduct

- i. **Out-of-Hours Noise:** The EIS predicts that out-of-hours (OOH) operation of the Gouldsville Road accommodation facility will exceed the sleep disturbance screening level at nearby residential receivers. While deemed "unlikely to cause awakening reactions," this still indicates an impact on amenity.

Council requests further detailed mitigation measures beyond a general "code of conduct" and "OOH work protocol" to address these specific noise impacts, particularly for the closest residences.

- ii. **Code of Conduct:** We acknowledge the commitment to a "code of conduct for workers".

Council expects this code to be rigorously enforced, with a zero-tolerance policy for anti-social behaviour, as outlined in our policy and supporting DPHI guidelines.

e. Ongoing Consultation and Coordination

- i. Council welcomes the commitment in the EIS to developing a "temporary worker accommodation management plan(s)" prior to construction, informed by consultation with councils and other stakeholders.

Council expects this plan to fully incorporate the principles and requirements outlined in our "Construction Workers Accommodation Policy" and the DPHI Guidelines for Construction Workers Accommodation (May 2025). We also expect continued, detailed consultation with our Planning, Infrastructure, Water and Sewer, and Biosecurity Officers during detailed design and prior to construction to



ensure all local requirements are met and cumulative impacts are managed effectively.

3. Land Use and Property Impacts

The project impact area within Singleton LGA is predominantly zoned RU1 – Primary Production, alongside SP2 – Infrastructure (Bayswater Power Station) and SP2 – Defence (Singleton Military Area). The EIS identifies 125 private freehold landholdings within the project impact area. We acknowledge that some landowners have requested whole property acquisitions (7 private landowners).

The HTP will require temporary construction leases and permanent acquisition of freehold land for infrastructure, which places restrictions on land use within these easements. Approximately 245 hectares of the Singleton Military Area are within the project impact area, leading to impacts during construction and the establishment of an 85-hectare permanent easement and 25 hectares of access tracks during operation, placing restrictions on Department of Defence land use. Crown land (35 hectares) and Travelling Stock Reserves (TSRs) (less than 2 hectares) are also impacted, necessitating ongoing consultation with Local Land Services.

Singleton Council requests to continue to work collaboratively with EnergyCo to ensure that these impacts are managed effectively and that the long-term sustainability and character of our land and properties are protected throughout the project's lifecycle.

4. Agriculture Impacts

A significant concern for Singleton Council is that approximately 98% of the agricultural lands intersecting the HTP project impact area are located within the Singleton LGA. Livestock grazing is the predominant agricultural activity (91% of agricultural land use), and the LGA is also renowned for its viticultural and equine breeding industries. The gross value of agriculture in the Singleton LGA was estimated at \$48,382,626 in 2021.

While the majority (76%) of the impacted agricultural land is identified as very-low to moderate-low capability, a small but important 8% is high capability land, primarily along the Hunter River, including 213 hectares of mapped biophysical strategic agricultural land (BSAL). Construction activities carry a risk of increasing biosecurity risks to farms, which requires a robust management plan. Potential impacts to aerial agricultural activities will require consultation and compensation for affected landholders.

Council seeks assurances that impacts to individual properties will be comprehensively managed through property management plans and that long-term agricultural productivity will be protected.

5. Social Impacts

The Singleton LGA forms part of the project's social locality, where communities deeply value connection to place, heritage, and the natural environment. We note the EIS's assessment of medium significance for several construction impacts after mitigation, including:

- Perceived lack of influence over decision-making and concerns about transparency.
- Land use changes and potential loss/relocation for landowners.
- Temporary changes to residential amenity from noise, vibration, and dust.



- Perceptions of safety and community cohesion due to the construction workforce, as well as changed access to recreational infrastructure.
- Impacts on rural livelihoods and biosecurity risks.
- Diminished mental health and wellbeing due to project-related stressors.
- Impacts on environmental values.
- Changes to traffic movements potentially creating new road safety risks.
- Potential impacts to Aboriginal cultural heritage, cultural landscapes, and wellbeing.

Operationally, while the project promises a high to very high social benefit for energy transition, the permanent infrastructure will lead to a permanent change in the visual and physical landscape, affecting residents' sense of place, assessed as a medium social impact.

Council requires robust mechanisms, including a Social Impact Management Plan and an equitable Community and Employment Benefit Program, to address these concerns and ensure benefits are shared with our local communities.

6. Aboriginal Heritage Impacts

The Aboriginal Cultural Heritage Assessment (ACHA) highlights the rich and complex cultural landscapes within the Singleton LGA. 32 discrete Aboriginal sites or places have been identified within the project impact area, including stone artefact scatters, grinding grooves, rock shelters, and cultural places. We are concerned that around 14 of these sites are likely to be subject to direct impacts, resulting in complete or partial loss.

The Singleton Local Government Area has a history of disturbance through mining of items of local and State significance to First Nations peoples. The cumulative impacts of disturbance are significant.

We acknowledge EnergyCo's commitment to avoiding direct impacts on high significance sites and also note the refinements made to avoid a culturally modified scar tree near HVO South and minimise disturbance to the Warkworth sand system.

Council stresses the need for continued, meaningful engagement with Registered Aboriginal Parties (RAPs), and the development of an Aboriginal Cultural Heritage Management Plan (ACHMP) prior to construction. This plan must ensure the proper management of archaeological mitigation, the handling of unexpected discoveries, and the protection of broader cultural landscape values, including cultural viewlines.

7. Historic Heritage Impacts

The EIS identifies 12 historic heritage items within the project impact area, and 15 within the visual study area. Of particular note are five sites of Commonwealth heritage significance within the Singleton Military Area, including Oakley Estate (170126/170127) and Warringah Stud/Old Myrtle (170129). The HTP corridor will encroach into the curtilage of Oakley Estate, with moderate visual impact anticipated. 'Stafford' homestead and 'Clifford' homestead (ruins) (1142) will also experience minor direct impacts and moderate visual impacts.

Council requires the proposed Historic Heritage Management Plan (HHMP) to be robustly developed in consultation with Council's Heritage Advisory Committee, Heritage NSW and NPWS and strongly supports the proposed installation of a commemorative plaque and ongoing consultation for preserving the water source.



8. Groundwater Impacts

The groundwater study area covers the project impact area within the Singleton LGA. While the potential for the project to intercept groundwater is considered minor, and the assessment concluded negligible impacts under the NSW Aquifer Interference Policy (AIP), there is a medium risk of encountering contamination in areas like the Singleton Military Area if dewatering is required during piling activities. The Singleton Military Area is listed in the NSW EPA's per- and poly-fluoroalkyl substances (PFAS) investigation program and Unexploded Ordnance (UXO) database.

Council requires stringent management plans for potential PFAS and UXO contamination, including site-specific risk assessments and consultation with the Department of Defence.

9. Flooding Impacts

The project impact area crosses Mudies Creek within the Singleton Military Area. Laydown areas in the Singleton LGA, such as Old Lemington Road (L1 and L2), are identified as not being impacted by mainstream flooding but by local catchment runoff. Construction activities within laydown areas are expected to have only a minor impact on flood behaviour. However, the new monopole towers within the Singleton Military Area realignment, being up to 1.5 m in diameter on footings up to 4 m in diameter, have the potential to obstruct flow conveyance.

While operation is predicted to have only minor and localised impacts on peak flood levels and flow velocities, Council seeks to ensure these assessments are conservative and that any impacts are comprehensively managed.

10. Soils and Contamination Impacts

The northern part of the Singleton LGA within the project impact area is dominated by the Dochra and Ravensworth Soil Landscapes, which are extensively cleared for grazing and coal mining. Four soil landscapes have a localised salinity hazard (41% of project impact area) and significant sodicity, leading to a high erosion risk where surface disturbance occurs. Contamination concerns are identified at mining sites and the Singleton Military Area, with a medium to high potential risk due to PFAS and UXO.

Council emphasises the need for stringent soil and contamination management plans, particularly for sodic soils and potential contaminants, to prevent environmental degradation and protect agricultural productivity.

11. Surface Water Impacts

The majority of the project impact area ultimately drains to the Hunter River. Water quality in sub-catchments such as Glennies Creek to Glendon Brook, particularly near the Singleton Military Area, is influenced by coal mining, defence activities, and agriculture. Potential impacts to water quality during construction from concrete batching and chemical/hazardous material storage are rated as moderate in high sensitivity receiving environments. The project intersects with Wollombi Brook, Congewai Creek, Black Creek, and Monkey Place Creek, which are habitat for the endangered Southern Purple Spotted Gudgeon.

While no significant impact is anticipated to drinking water for Singleton, Council requires comprehensive Soil and Water Management Plans to protect water quality, stream stability, and aquatic biodiversity, especially at watercourse crossings.



12. Biodiversity Impacts

The project is a controlled action under the EPBC Act due to impacts on federally protected threatened species, ecological communities, and Commonwealth land (Singleton Military Area). Construction will result in direct impacts to approximately 762 hectares of native vegetation, with 546 hectares completely cleared. Direct impacts to 7 BC Act listed Threatened Ecological Communities (TECs) would be around 207 hectares, with the largest impact to the Central Hunter Grey Box-Ironbark Woodland (142 hectares).

The Singleton Military Area is mapped as important habitat for the critically endangered Regent Honeyeater and Swift Parrot. Ecological surveys recorded 18 threatened fauna species and predicted another 123 species in the SMA. Council notes the efforts to avoid SAI species like Brush-tailed Rock-Wallaby and Sooty Owl through alignment refinements.

The Singleton LGA has a fragmented biodiversity landscape. Council has an adopted Biodiversity Conservation Policy that should be considered when determining potential avoid, mitigate and offset strategies.

Council acknowledges the recent publication of the Hunter Conservation Investment Strategy and would seek to continue discussions regarding protection and enhancement of biodiversity values.

Council has adopted its Rural Lands Strategy in September 2025. This Strategy includes a series of actions to support landholders deliver biodiversity outcomes on rural lands.

We seek strong assurances regarding the Strategic Offset Delivery Agreement (SODA) to address biodiversity offsets, as well as the implementation of a comprehensive Biodiversity Management Plan and connectivity strategy to mitigate habitat fragmentation and protect threatened species.

We seek ongoing and collaborative engagement with DCCEEW and EnergyCo on biodiversity opportunities that will meet our adopted strategic outcomes.

13. Noise and Vibration Impacts

The EIS outlines that construction activities will generate temporary noise impacts across the Singleton LGA, affecting sensitive receivers such as residential properties. We note the identification of several Noise Catchment Areas (NCAs) within our LGA, including NCA01 (Liddell and Bayswater), NCA02 (Jerrys Plains West and Howick), NCA03 (Jerrys Plains), NCA04 (Maison Dieu West), NCA05 (Mount Thorley), NCA06 (Broke), and NCA08 (HTP Central).

During construction temporary but significant noise impacts are predicted during construction. Earthworks with rock breakers and intensive intersection upgrades are expected to lead to "highly noise affected" receivers in areas such as Jerrys Plains, Maison Dieu West and Mount Thorley. Additionally, local roads are likely to experience a "noticeable increase" in noise from construction traffic, and helicopter operations will also contribute to noise levels.

Construction activities are noted to pose a risk of cosmetic damage to buildings at 10 receivers and could cause human discomfort at 58 receivers

While general operational noise is expected to be low, corona discharge from transmission lines during light rain or mist (L50 conditions) is predicted to exceed night-time noise limits at 10 residential receivers. These impacts are categorised as "significant" at two residential receivers and "moderate" at six.



The Singleton LGA is identified as an area prone to "construction fatigue" due to the HTP potentially coinciding with other projects like the Hunter Valley Operations Continuation Projects and the Maison Dieu Solar Farm, leading to cumulative noise impacts for residents.

Council calls for strict adherence to Construction Noise and Vibration Management Plans, community notification protocols, and ongoing monitoring to ensure operational noise remains within acceptable limits, with direct consultation and solutions for affected landowners. Adherence to Singleton Council's Construction Workers Accommodation Policy is also required for temporary worker facilities

14. Landscape and Visual Impacts

The Singleton LGA includes diverse landscape character zones (LCZs) such as Energy and Mining, Hunter River (Lemington) rural valley and Wollombi Brook rural valley. Moderate daytime construction and operational impacts are predicted in LCZ 7 (Wollombi Brook rural valley).

A detailed visual assessment identified potential high to moderate visual impacts for several private dwellings in areas like Maison Dieu, Long Point, Broke, and Mount Thorley. Council acknowledges the project's efforts to refine the alignment to minimise visual impacts on surrounding communities, including Broke.

We expect the Landscape Character and Visual Impact Management Plan to include measures such as vegetation screening, sensitive lighting design, and tailored screening options for private properties to minimise these impacts. These measures should include measures to protect visual landscapes during construction, particularly where sight lines intersect high value landscapes.

15. Cumulative Impacts

The Singleton LGA is a significant focus for cumulative impact assessment due to numerous simultaneous projects, including new energy developments (e.g., Maison Dieu Solar Farm, Hunter-Central Coast REZ etc.), mining activities, and transport upgrades. Council is highly concerned about potential cumulative impacts, including:

- Traffic congestion.
- Community wellbeing and disruption.
- A pervasive sense of "construction fatigue" due to hosting a large proportion of future energy infrastructure projects.
- Overlapping heavy vehicle movements and minor noise exceedances with projects like the Hunter Valley Operations continuation projects and Maison Dieu Solar Farm.

Council urges EnergyCo to commit to ongoing, proactive engagement and coordination with proponents of other relevant projects to identify, avoid, and mitigate cumulative impacts, especially concerning traffic, community amenity, and local services.

16. Waste Management

As identified in the EIS, the Singleton Waste Management Facility (Dyrring Road, Fern Gully) is an existing licensed facility that accepts a wide range of wastes.



Council requires further consultation during detailed design to confirm the capacity of this facility to accept the indicative volumes of waste from the HTP, as well as the development of a Circular Economy Management Plan that provides for the long term and sustainable hierarchy of waste management.

17. Economic Impacts

The EIS identifies the potential for increased competition for workers, which could strain labour availability in the regional social locality.

Council seeks mechanisms to support local businesses and ensure a balanced labour market, drawing on initiatives such as the proposed Local Business and Employment Strategy.

18. Aviation and Telecommunications Impacts

The Singleton Military Area is relevant for aviation impacts, requiring obstacle lighting for non-certified aerodromes and helicopter landing sites within 5.6 km of the HTP corridor. Potential radio frequency interference from transmission infrastructure on existing Telstra assets in the Singleton Military Area and Mount Thorley is also identified.

Council requires full compliance with aviation safety requirements and mitigation of telecommunications interference.

19. Community Benefits Scheme

Despite being one of the most frequent concerns raised by Council and the community during consultation prior to submission of the EIS, the EIS is silent on the provision of Community Benefits. Council notes the engagement with the Regional Reference Group and discussions with that group on community benefits, noting that these discussions have not resulted in any defined benefit program.

Council acknowledges that EnergyCo is not proposing to develop an Access Scheme, and therefore any Community and Employment Benefit Program for the HCC REZ will unlikely replicate those provided for in other REZs (such as Central West Orana). Council notes that the HTP does not fall within the HCC REZ remit.

Council also notes that there is an existing Parliamentary Inquiry into the impact of renewable energy zones (REZ) on rural and regional communities and industries in New South Wales. Singleton Council made a submission into this Inquiry in January 2025 which included comments regarding Community Benefits, noting that the Department of Planning, Housing and Infrastructure Benefit Sharing Guideline does not apply to electricity transmission infrastructure.

The Secretary's Environmental Assessment Requirements issued for the Project on 12 August 2024 include a requirement to provide *details of any proposed benefit sharing arrangements*. The Social Impact Assessment states that EnergyCo intends to *consult with relevant communities in 2026 to inform the design and delivery of the Community and Employment Benefit Program in the Hunter Central Coast region*.

The EIS lacks detail on the proposed framework for benefits, the governance structure and the timing for when these benefits will be provided and delivered. Council considers that delaying discussion regarding community benefits (to potentially a post approval environment) will result in commencement of impacts and lost benefits to communities directly affected by the hosting of the Hunter Transmission Project.



Singleton Council has advised EnergyCo that it has an adopted Planning Agreements Policy which sets a minimum 1.5% of Capital Investment Value for the negotiation of Planning Agreements within the LGA.

Additionally, from 1 July 2025, Council's adopted Local Infrastructure Contributions Plan applies a section 7.12 rate of 1% of Capital Investment Value for any development not covered by a section 7.11 rate. Council notes that the provisions of Division 7.1 of the *Environmental Planning and Assessment Act, 1979* do not apply to State significant infrastructure.

These policy frameworks are the minimum expectation Singleton Council has in relation to the provision of community benefit for any development within the Singleton LGA and would encourage EnergyCo to commence discussions with council on this matter as soon as possible.

Council requires a response to its enquiries regarding community benefits, how the Project intends to meet Council's adopted policy framework, or otherwise, and transparently provide both Council and the community with adequate time to assess and determine the impacts and consequences of any proposed benefit, program or scheme across the three impacted LGAs.

Conclusion and Recommendations

Singleton Council acknowledges the extensive assessment undertaken by EnergyCo. However, the sheer scale and scope of impacts within the Singleton LGA necessitate a resolute commitment to local impact management and benefit delivery.

Singleton Council strongly requests EnergyCo to:

- Continue proactive and transparent engagement with Singleton Council, directly affected landowners, Aboriginal communities, businesses, and community groups throughout all project phases.
- Ensure any Construction Workers Accommodation fully aligns with the principles of our adopted *Construction Workers Accommodation Policy* to ensure that the facility is appropriately located, managed, and integrated into the Singleton community, while maximising benefits and minimising risks during and after construction.
- Implement robust and independently verifiable mitigation and management measures for all identified impacts, particularly in traffic and transport, land use, agriculture, biodiversity, and heritage.
- Develop and implement a comprehensive Aboriginal Cultural Heritage Management Plan and Historic Heritage Management Plan in full collaboration with Traditional Owners and heritage experts, ensuring the avoidance of culturally significant sites and meaningful interpretation where impacts are unavoidable.
- Finalise and deliver a meaningful and equitable Community and Employment Benefit Program that directly addresses the unique impacts and needs of the Singleton LGA, including support for local employment, businesses, and community infrastructure.
- Ensure ongoing coordination with other major projects in the LGA to manage and mitigate cumulative impacts effectively, preventing "construction fatigue" and undue strain on local resources.
- Provide clear communication channels for complaints and feedback, with timely and effective responses.



- Commit to adaptive management strategies, allowing for adjustments to plans based on real-time monitoring and community feedback.

Singleton Council looks forward to continued dialogue with EnergyCo and DPHI to ensure the HTP is delivered in a manner that respects and benefits the Singleton community, while contributing to the State's energy future.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mary-Anne Crawford', with a long, sweeping underline.

Mary-Anne Crawford

Manager Development and Environmental Services

