



Our ref: DOC25/723503-10

24 September 2025

Kurtis Wathen
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure

Via: NSW Major Projects Planning portal

**EPA Advice on Environmental Impact Statement
Hunter Transmission Project – SSI-70610456**

Dear Kurtis,

I am writing in response to your request for the NSW Environment Protection Authority (EPA) to review the Environmental Impact Statement (EIS) for the proposed Hunter Transmission Project.

The EPA has reviewed the following documents:

- *Environmental Impact Statement* – EnergyCo – August 2025
- *Noise and Vibration Impact Assessment* (NVIA) (Revision 1.0) – SLR – August 2025
- *Air quality and greenhouse gas impact assessment* (AQIA) (Version 7) – EMM – 4 August 2025
- *Contamination preliminary site investigation* (Revision F) – WSP – 5 August 2025
- *Surface Water Impact Assessment* (Version 6) – EMM – 6 August 2025
- *Soils and land impact assessment* (Final version 3) – Minesoils – 17 July 2025

The EPA understand the proposal is for:

- Construction and operation of 110km of 500kV transmission line from Bayswater South to Olney switching stations,
- Upgrade to Bayswater and Eraring substations,
- Establishment of 5 construction sites, including helicopter facilities, temporary accommodation, wastewater treatment plants, aggregate crushing, grinding and separation facilities,
- Access tracks and ancillary works.

Based on the information provided, the proposal is being undertaken by EnergyCo, therefore the EPA would be the ARA for the proposal under Section 6(2) of the *Protection of the Environment Operations* (POEO) 1997.

The EPA has reviewed the EIS and notes that it generally provides the information required to allow us to complete our assessment. The EPA has the following comments and recommendations:

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

Phone:
131 555

Email:
info@epa.nsw.gov.au

Website:
epa.nsw.gov.au

Visit:
6 Parramatta Square
10 Darcy Street
Parramatta NSW 2150

Mail:
Locked Bag 5022
Parramatta NSW 2124



1. Matters for consideration

The EPA provides the detailed comments regarding the matters below in **Attachment A** for consideration by the Department of Planning, Housing and Infrastructure (DPHI) as part of its assessment of the proposal.

- a. Noise impacts (key issue)
- b. Air Quality
- c. Waste
- d. Relevant requirements of existing Environmental Protection Licences

2. Matters to be addressed with conditions

The EPA recommends DPHI consider the matters listed below and detailed in **Attachment B** as part of preparing any draft conditions for the project.

- e. Noise impacts
- f. Air quality
- g. Waste
- h. Contamination

It is noted that as part of the development of detailed design and construction documentation, the need for an Environmental Protection Licence (EPL) the *Protection of the Environment Operations Act 1997* (POEO Act) may be identified, particularly for Helicopter-related activities, Crushing, grinding or separating, Electricity Generation (back-up diesel generators) or Sewage treatment.

The EPA advises DPHI that the Proponent is responsible for determining whether any activities trigger the requirement for an EPL and applying for the appropriate licence. The EPA recommends DPHI ensure a post-approval Construction Environmental Management Plan is implemented and includes provisions for continuous review of relevant details and ensure an EPL is obtained prior to works exceeding any thresholds in Schedule 1 of the POEO Act at any of the construction sites.

The EPA is willing to be consulted further should DPHI wish for review of any draft conditions for the project. In particular, the EPA would have recommendations with regard to any noise limits to be imposed on switching stations and substations and audible transmission line noise.

Please contact Carlos Ferguson at environmentprotection.planning@epa.nsw.gov.au if you have any further questions about this matter.

Yours sincerely,



GABRIELLE SUTHERLAND
A/Unit Head – Environment Protection Planning
NSW Environment Protection Authority

ATTACHMENT A – Detailed comments for consideration – EIS for Hunter Transmission Line – SSI-70610456

a. Noise impacts (key issue)

Construction Noise

The EPA notes construction noise and construction traffic noise were predicted to exceed noise management levels (NMLs) under the *Interim Construction Noise Guideline* and relevant thresholds under the *Road Noise Policy*. This included predicted exceedances from accommodation camps and high L_{Amax} noise levels from helicopter sources around the Freemans Drive construction site.

Operational Noise

The Noise Vibration Impact Assessment (NVIA) identified Corona noise was predicted to exceed Project Noise Trigger Levels (PNTLs) at potentially 11 rural properties in the central and southern parts of the project impact area (NCA03, NCA04 and NCA05). These levels of Corona noise would occur occasionally and usually under the specific weather conditions of light rain or mist.

DPHI should note that the recommended PNTLs for audible transmission line noise are with an exemption if a negotiated agreement is in place, and the proposal should address any negotiated agreements as part of any approval for the project.

Recommendation: The EPA recommends DPHI consider requiring preparation and implementation of a Construction Noise and Vibration Management Plan (CNVMP) as part of any project approval. Further detail on this is provided in **Attachment B**.

The EPA also suggests DPHI consider the need for an independent Environmental Representative and/or independent Acoustics Advisor to advise on the noise and vibration components of the project, particularly due to the potential for construction noise impacts.

b. Air Quality

Section 5 of the AQIA, particularly Table 5.2, states there are no human receptors at the Wollombi Road, Millfield location. The EPA's review indicates there are several potential rural residential dwellings in proximity that may be sensitive to air quality impacts. It is noted the NVIA identifies residential receivers in proximity to the Wollombi Road site.

Recommendation: The AQIA should clarify any assumptions regarding nearby residential receivers and demonstrate potential impacts to all sensitive receptors has been considered.

c. Waste

The proposal has the potential to generate large quantities of waste. Construction and decommissioning of the proposal may exceed the capacity of local waste management facilities. It is recommended that the applicant prepare and implement a waste management strategy in consultation with the relevant local Councils to show waste will be directed to facilities that can lawfully accept it, including:

- The capability of the waste management facilities of the relevant Local Government Area to accept the volumes of waste predicted to be deposited and any associated approvals required to create and/or expand waste storage or disposal facilities.
- Any infrastructure that may be required at any waste facilities that are proposed to be created and/or expanded to receive additional volumes of waste from the project.

Further, the EIS identifies approximately 450,000 cubic metres of spoil as unsuitable for reuse. For this material, the proponent should clearly demonstrate that all reasonable reuse and recycling options have been investigated and exhausted before proposing disposal.

Considerations for waste conditions are included in **Attachment B**.

d. Relevant requirements of existing Environmental Protection Licences

The project area includes land subject to the EPLs listed below. DPHI should consider whether these licences are intended to be varied to excise the proposed work areas from the respective licences.

Where constructions works are undertaken within licenced areas, they will need to be undertaken in accordance with the relevant licence conditions.

The following environment protection licences will be impacted from the proposal.

- Mount Arthur – EPL 11457
- Maxwell underground – EPL 1323
- Hunter Valley Operations – EPL 640
- Ravensworth – EPL 2652
- Mount Thorley – EPL 1976
- Warkworth – EPL 1376
- Bulga – EPL 563
- Bayswater Power Station – EPL 779
- Redbank Power Station – EPL 11262
- Eraring Power Station – EPL 1429

Recommendation: Where construction activities are proposed to be undertaken on licenced areas, DPHI should consider requiring preparation and implementation of a post-approval Construction Environmental Management Plan (CEMP) that addresses the relevant licence requirements for each construction area.

ATTACHMENT B - Matters for consideration as part of conditions for any approval – EIS for Hunter Transmission Line – SSI-70610456

The EPA recommends DPHI consider the matters below when preparing any draft conditions for the proposal.

e. Noise

The proposal should prepare and implement a detailed Construction Noise and Vibration Management Plan (CNVMP) prior to commencement of construction activities, that includes but is not necessarily limited to:

- identification of each work area, site compound and access route (both private and public),
- identification of the specific activities that will be carried out and associated noise sources at the premises and access routes,
- identification of all potentially affected sensitive receivers, and detailing any noise agreements with relevant landowners,
- use quieter equipment and alternative construction methods, where possible,
- schedule noisy activities to avoid multiple high-noise events occurring at the same time
- install barriers or screens where feasible,
- the construction noise and vibration objectives identified in the Environmental Assessment,
- assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the objectives identified in the Environmental Assessment,
- where the objectives are predicted to be exceeded an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise/vibration impacts,
- description of management methods and procedures and specific noise mitigation treatments that will be implemented to control noise and vibration during construction,
- procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity,
- measures to monitor noise/vibration performance and respond to complaints.

f. Waste

The EPA recommends the following waste requirements be addressed as part of any project approval.

1. Waste generated during construction, operation, upgrading and decommissioning should be dealt with in accordance with the following priorities:
 - waste generation must be avoided and where avoidance is not reasonably practicable, waste generation must be reduced.
 - where avoiding or reducing waste is not possible, waste must be re-used, recycled, or recovered.
 - where re-using, recycling or recovering waste is not possible, waste must be treated or disposed of.
2. The importation of waste and storage, treatment, processing, reprocessing or disposal of such waste should comply with the *Protection of the Environment Operations Act 1997*, the *Protection of the Environment Operations (Waste) Regulation 2014*, and orders or exemptions under the regulation.
3. Waste should only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the *Protection of the Environment Operations (Waste) Regulation 2014*, or to any other place that can lawfully accept such waste.

4. All waste that is removed from site should be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.
5. The proposal should prepare and implement a Waste and Resource Recovery Management Plan for the project prior to the commencement of operation. This program should:
 - be prepared in consultation with EPA and relevant Councils,
 - be approved by the Planning Secretary prior to commencement of operation,
 - include in the plan:
 - details of the quantity, type and source of waste received,
 - details of the quantity, type and quality of the waste produced and their intended fate,
 - details of the intended fates of all other waste and materials received/produced on site which are not suitable for re-use,
 - details of any materials produced which will require a specific Resource Recovery Order,
 - details of any materials produced under a Resource Recovery Order, and the controls/procedures in place for meeting the conditions of that order,
 - details of any testing/monitoring procedures,
 - details of how materials segregation will be achieved, particularly the segregation of contaminated soils and resource recovery materials,
 - the capability of the selected waste management facilities to accept the volumes of waste predicted to be deposited and any associated approvals required to create and/or expand waste storage or disposal facilities,
 - any infrastructure that may be required at any waste facilities that are proposed to be created and/or expanded to receive additional volumes of waste from the project.

g. Air Quality

Construction activities should be managed in a way to mitigate dust impacts, especially during demolition, earthworks, and construction. The Air Quality and GHG Report states that a construction air quality management plan will be prepared to manage site environmental impacts. Additionally, specific air quality mitigation measures will be included in the issue-specific environmental management plans for the project.

Recommendation: To ensure construction activities are appropriately managed to minimise potential risks to ecological and human health receptors, the EPA recommends DPHI require preparation of a Construction Air Quality Management Plan. The Plan should include management measures to mitigate the risk of air quality impacts from construction activities.

h. Contamination

The EPA notes several locations within the project area have been identified as having potential contamination sources. Existing mining sites and power station sites have been identified as having the highest potential for contamination to be encountered during construction.

Recommendation:

To ensure construction activities are appropriately managed to minimise potential risks to ecological and human health receptors, the EPA recommends DPHI require preparation and implementation of a Construction Environmental Management Plan (CEMP). The plan should be developed in accordance with the *Guidelines for Consultants Reporting on Contaminated Land - Contaminated Land Guidelines: NSW EPA (2020)*.

This should include robust unexpected finds protocol noting the uncertainty around the presence of contaminants in soil, surface water and groundwater, especially in the high and medium risk areas identified. A soil and water management plan should also be included to prevent impacts to surface water and groundwater.