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Via email

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Dear Emma,

State Significant Development Application - Amendments and Refinements for The Hunter Transmission Project

Thank you for the opportunity to provide advice on the Hunter Transmission Project. The construction resources requirements include around 830 full-time equivalent workers during peak construction periods. It is understood that the key elements of the Hunter Transmission Project include:

- 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 works to facilitate access to the transmission lines and switching stations
- utility adjustments required 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.

We have reviewed the following documents provided as part of the preparation of our advice.

- EnergyCo, 2026. Amendment Report Hunter Transmission Project
- EnergyCo, 2025. Hunter Transmission Project Executive Summary
- Lyall & Associates, 2026. Addendum Flood Impact Assessment Hunter Transmission Project Amendment Report Rev 3
- Appendix A Assessment requirements compliance

- Appendix C Water Management Act 2000 (WM Act)
- EnergyCo, 2024. Scoping report Hunter Transmission Project

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunamis in NSW. This role includes planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

The Hunter Transmission Project corridor runs mostly through power station, mining and government land between Bayswater and Broke. It then traverses the Pokolbin, Corrabare, Watagan and Olney State forests where it joins the existing 500 kV transmission line running between Eraring and Kemps Creek in Western Sydney. The Hunter Transmission Project area is partially located within the major surface water catchments of the Hunter River, Lake Macquarie and Tuggerah Lakes. The majority of the project impact area drains to the Hunter River via several major (and minor) watercourses including Wollombi Brook and Congewai Creek. The key issues identified are the project's flood risks associated with crossing the Hunter River, Wollombi Brook and the associated floodplain as well as risks to streamflow regime and riparian zones during construction and operation of the project. This is further detailed in Attachment A.

In summary, the NSW SES:

- **Note** the information provided including the amendments and refinements has considered the impact of flooding including flash flooding on the associated infrastructure and construction facilities, local roads and people using these facilities up to and including the Probable Maximum Flood (PMF). The NSW SES understand the measures that are set out Section 7 of Technical Report 12 of the EIS to manage the impact of construction activities on flood behaviour would also be applicable to the amended project.¹
- **Note** the Hunter Transmission Project Amendment Report summary of mitigation and management measures details the revised environmental management measures that would be implemented to manage flood-related during the construction and operation of the amended Hunter Transmission Project.^{2,3,4}
- **Recommend** pursuing site design and stormwater management that minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the current and future community.
- **Note** that flood emergency management measures for construction of the project would be prepared and incorporated into relevant environmental and/or safety

¹ Lyall & Associates, 2026. Addendum Flood Impact Assessment Hunter Transmission Project Amendment Report Rev 3 page S5

² Appendix A Assessment requirements compliance. Key Issues page A.5, C.17, E.28,

³ Lyall & Associates, 2026. Addendum Flood Impact Assessment Hunter Transmission Project Amendment Report Rev 3

⁴ Energy Co, 2026. Amendment Report Hunter Transmission Project page xxiii, D83-D89

management documentation. Refinements within the Mount Thorley-Warkworth mining complex land adjacent to the Golden Highway shifted the transmission line alignment away from the Hunter River, further west. This realignment of the transmission line at Mount Thorley adjustment has therefore allowed tower foundations to be sited in areas with reduced peak flood depths and velocities, improving resilience during flood events.⁵

- **Note** the flood emergency management considerations for the temporary worker accommodation. Three temporary worker accommodation facilities catering for around 780 workers located at the Hebden Road, Gouldsville Road and Freemans Drive construction support sites.⁶ We note that the detailed planning of the layout of the construction support sites and temporary worker accommodation will consider the risk of evacuation routes provided for construction workers during a flood event.⁷
- **Recommend** the proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the various local flood plans, and the state flood plan.
- **Recommend** flood emergency management plans include considering closing any worksites and securing all materials and equipment prior to the start of the working day if there is a risk of riverine or flash flooding, on receipt of advice from the Bureau of Meteorology (BoM), or when other evidence leads to an expectation of flooding. During site works, check the BoM website prior to start of the workday for any Severe Weather Warnings.
- **Recommend** the Traffic Management Plan developed for the Hunter Transmission Project should also include the impact of flooding on access and isolation during and after the project. The proposed plan will outline mitigation measures to manage traffic and transport impacts.⁸

You may also find the following Guidelines on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Gillian Webber via email at rra@ses.nsw.gov.au should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

⁵ Energy Co, 2026. Amendment Report Hunter Transmission Project page 35, 312, 315,

⁶ EnergyCo, 2025. Hunter Transmission Project Executive summary page 8

⁷ Lyall & Associates, 2026. Addendum Flood Impact Assessment Hunter Transmission Project Amendment Report Rev 3 page S2

⁸ EnergyCo, 2025. Hunter Transmission Project Executive summary page 31

Yours sincerely,



Peter Cinque
Senior Manager, Emergency Risk Management
NSW State Emergency Service

ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline⁹

Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.

Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan¹⁰ and the relevant local flood plans, where evacuation is the preferred emergency management strategy for people impacted by flooding.

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Further, risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. Climate change should also be considered. We acknowledge refinements within the Mount Thorley-Warkworth mining complex land adjacent to the Golden Highway shifted the transmission line alignment away from the Hunter River, further west. This adjustment allowed tower foundations to be sited in areas with reduced peak flood depths and velocities, improving resilience during flood events.

Where the project intersects the Hunter River flood plain the flood extent is about 1.1 kilometres wide, and the river is a maximum depth of about 15 metres. The river can increase to a width of 1.4 kilometres and depth of 19 metres during the probable maximum flood. Backwater flooding from the Hunter River also influences flood behaviour along the sections of the project where it crosses the Wollombi Brook, Sandy Hollow Creek, and Loder Creek.¹¹

It is understood that operation of the project would not increase the overall flood hazard and emergency response arrangement for existing developments under a 1% annual exceedance probability event. The operation of the project is expected to have only a minor and localised impact on peak flood levels and flow velocities during flood events.¹²

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained. It is not to be impacted on by the cumulative impact of new development.

⁹ NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

¹⁰ NSW Government. 2024. NSW State Flood Plan. Section 5.1.7, page 34

¹¹ EnergyCo, 2025. Hunter Transmission Project Executive summary page 48

¹² EnergyCo, 2025. Hunter Transmission Project Executive summary page 49

Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes. Evacuation must not require people to drive or walk through flood water.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing flood risks associated with flooding requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Principle 5 Risks faced by the itinerant population need to be managed.

Any Emergency Management strategy needs to consider people visiting the area or using a development. It is understood that the reconfiguration of the Wollombi Road construction support site to include temporary worker accommodation would increase flood risk during construction as it would introduce an added risk to workers should a flood occur overnight. However, temporary buildings for worker accommodation would be located a minimum 0.5 metres above the peak one per cent AEP level, which is consistent with the flood planning levels that are prescribed in the development control plans of the relevant councils.¹³

Principle 6 Recognise the need for effective flood warning and associated limitations.

An effective flood warning strategy with clear and concise messaging understood by the community is key to providing the community an opportunity to respond to a flood threat in an appropriate and timely manner.

NSW SES utilises the Australian Warning System which is a nationally consistent, three-tiered approach to issue clear warnings and lead people to take action ahead of severe weather events. The three warning tiers consist of Advice, Watch and Act and Emergency Warning. These warnings can be viewed on the SES website and the HazardWatch website and app.

¹³ Energy Co, 2026. Amendment Report Hunter Transmission Project page xxiii

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

Development within a floodplain will necessitate ongoing involvement from the NSW State Emergency Service (SES) in community awareness, preparedness, and response activities. The flood risk at the sites and actions taken to reduce risk to life should be communicated to all site users (includes increasing risk awareness, community connections, preparedness actions, appropriate signage and emergency drills) during and after the construction phase, for the lifespan of the development.