

17/09/25

**Re: Submission response to Hunter Transmission Project
Environmental Impact Statement**

Ambiguity, contradiction, and confusion are three words that have come to define my views of Energy Co's handling of the HTP.

Engagement with Energy Co. from my first interaction in April 2024 until now - reading the EIS, has given a constant state of uncertainty in regards to the intention of recognising, mitigating and "reducing impacts on people and environment" - albeit the catch phrase used again and again during interactions.

Although concerns of impacts to people and properties affected by the HTP is present in the SIA (Technical report 6), feedback on specific issues and evidence of detailed and rigorous discussion by stakeholders is absent in the EIS and mitigation measures particularly in regards to impacts to road safety, business, people, agriculture, amenity and infrastructure of Pokolbin Mountains Road (PMR) and Broken Back Road's easement through Myrtledale (access to Central HTP).

My perspective on this project is from being a 5th generation resident on Myrtledale Pokolbin with involvement in family beef cattle enterprise, owning and operating a tourist accommodation business (livelihood) on Myrtledale and raising two young children (6 & 3 years).

Please see attached table with outline of specific concerns regarding HTP central access roads, Pokolbin Mountains Road (PMR) and Broken Back Road (BBR), reference to the EIS, comment and expected mitigation. And attached assortment of related images.

I do sincerely hope EIS submissions such as my own are received with empathy, respect and genuine consideration.

Amelia Attkins

Ph:0478 782 700

Email: amelies338@hotmail.com

Project Element	Comment/ feedback	Reference	Suggested Addition to EIS and/or Mitigation
<p>Engagement and Social Impact</p>	<p>Our stakeholder key concerns have been vaguely mentioned as “key themes raised”, in table 9, and detailed in the SIA however, the specifics of feedback and how it has shaped the EIS are NOT adequately seen in the EIS.</p> <p>Where addressed for example in table 9 “Construction impacts”</p> <p>Referenced “assessments” “used to avoid and minimise risk” are indecorous for the uniqueness of the central access to the HTP. (As further discussed in the Roads and Traffic section of this table.)</p> <p>Mitigating measures included are for HTP’s use of heavy vehicles ONLY not considering other impacts of the HTP and feedback regarding its interactions with PMR, BBR and Myrtleedale.</p> <p>Further more in appendix D section 3.9 table 14 Cessnock City Council (Construction impacts), it is indicated Cessnock City Council will be the only stakeholder to be included in ongoing input during the detailed design phase. To best minimise impact and created an efficient and safe execution of the HTP I would implore input from “high” impact stakeholders also be included during detailed design.</p> <p>With the project having little to no local benefit, impacts being majority negative and the locale of PMR and BBR being considered “high” impact feed back and detailed scope for mitigation would be assumed present in the EIS based off previous engagement with Energy Co.</p> <p>As specified in EIS 24 pg.1026 “Issue-specific environmental management plans will be prepared in accordance with the mitigation measures and commitments detailed in this EIS...” and as Energy Co. have lead us to believe throughout our engagement - the document used to approve the HTP (EIS and Technical Reports) form the basis for legally binding conditions of approval where by Environmental Management Plans to address specific contract requirements are created.</p> <p>What assurance is there for impacted stakeholders that road upgrades required for safe and efficient road use, and mitigation measures to maintain amenity, and ability to continue business without detrimental economic and reputational impacts will be executed during the detailed design and construction phase when there is no clear scope for such mitigation for PMR, BBR and sensitive receivers in the EIS?</p> <p>If adequate mitigation to avoid impacts to livelihood is not implemented compensation for negative impact would be expected if economic down turn is a direct impact of the HTP.</p>	<p>-Appendix D table 2 EIS engagement -Technical report 6 Table ES1 -Appendix D table 5 Stakeholder groups -Appendix D 3.2 -Appendix D3.4 Pokolbin Mountains Road Residents, Landholders and Users -Appendix D table 9 feedback from community, local groups and recreational users - EIS 14 Table 14.5 -EIS 24 24.1, 24.3.1, 23.3.2,</p>	<p>Ensure directly affected land owners, residents and business owners along access roads are included in the creation of:</p> <ul style="list-style-type: none"> - The community and Stakeholder Engagement Plan -Biosecurity Management Plan -Traffic Management Plan -Property Management Plans -Social Impact Management Plan <p>Facilitation of collaboration between highly affected people and council during detailed design and construction to provide the best outcomes for the Council, community and HTP.</p> <p>Scope for upgrade works and allowance for additional mitigation measures to be included in the EIS to form a basis for further detailed management plans.</p> <p>Compensation in the event of failure of mitigation measure to prevent detrimental impacts to amenity, business and safety.</p>

<p>Mapping</p>	<p>Maps used throughout the EIS show Pokolbin Mountains Road and the first portion of Broken Back Road where it transverses through Myrtdale unmarked as access tracks to central HTP. This is contradictory as the EIS online interactive maps show all unsealed parts of PMR and BBR to be marked as access tracks.</p> <p>It is also not clear, although presumed that the terms access road and access track are interchangeable terms. This ambiguity and inconsistency leave other considerations in the EIS unclear.</p> <p>Which version of maps is accurate and being assessed for purpose of inclusion in the EIS?</p> <p>And if the section between McDonalds Road intersection with PMR and the unsealed portion of PMR is unmarked as an access track/road; do the HTP vehicles and equipment required for construction plan to jump or fly over this section of road?</p>	<p>-Hunter Transmission Project Environmental Impact Statement Figure 2.2, 22.1, 18.4, 16.1, 8.1 -Interactive EIS map Hunter Transmission Project EnergyCo</p>	<p>The entirety of PMR and BBR must be considered in the scope for the whole EIS as an access track/road. This should be clearly marked on all maps.</p> <p>Confirmation of terms or their interchangeability – Access Track / Access Road</p>
<p>Roads and Traffic</p>	<p>*As mentioned in Mapping I continue with presumption PMR and BBR are included in their entirety as access tracks/roads as they should be.</p> <p>Concerns for safe and efficient use of PMR and BBR have been ongoing for several years now due to increased use in conjunction with road condition due to lack of adequate infrastructure and funds for Cessnock City Council to support and execute required upgrades to the road.</p> <p>With the realisation that the HTP would use PMR and BBR as access roads to build at least 13 transmission towers through Pokolbin State Forest concerns further peaked for safety and the roads capacity for additional traffic.</p> <p>Reading the EIS and associated technical reports regarding access roads, road up grades and impacts from the construction of HTP it is evident PMR and BBR are not considered carefully or specifically in the EIS as evident through;</p> <p>-Lack of inclusion on mapping</p> <p>-Contradiction to the road’s lane capability with EIS 11.2.1 identifying PMR as a single lane road and TTIA table 4.3 stating bidirectional two lane</p> <p>-No Mid-block assessment on PMR</p> <p>-Speed limit of PMR is not known in the assessment</p> <p>- Narrow stakeholder consultation in TTIA - Council only with</p>	<p>-Technical report 4 (Traffic and Transport Impact Assessment) -fig 3.2 -table 4.3 - fig 4.9. - page 169 - table 5.14 - 5.3.11 -fig. 5.10 -3.4.2 -3.4.3 -Table 3.12 -5.2.9.1 -5.3.11</p> <p>-Environmental Impact Statement -11.2.1 -11.5 (TT5) - Table 4.8 - Table 4.9 -Page 149</p>	<p>-Acknowledgement of PMR’s uniqueness therefore inability to be measured by most standard road assessments.</p> <p>-Specific scope for PMR to be included in EIS to feed into management plans and detailed design.</p> <p>Upgrades to be included in scope: -Drainage and guttering -Road widening where possible -Vegetation management -Upgrades to sealed portion (to reduce chance of head on collision due to road positioning of vehicles avoiding damaged road pavement) -Signage (e.g. speed limit – 40km MAX, drive slow, keep left, 20km shared zone speed limit through Myrtdale easement, caution grazing stock”)</p> <p>-Traffic Control specifics in Traffic Management plans</p>

	<p>no consideration for directly impacted stake holders.</p> <p>This inconsistency shows the road can not be clarified through data studies used to form the TTIA</p> <p>Further the location of the road in a high tourism and recreational area means usage is not consistent day to day and peak usage would be Friday, Saturday, Sunday, Monday meaning usage is not captured in the Tuesday/ Wednesday data collection periods outlined in the TTIA. This should be considered as Friday and Saturday are within HTP's working days.</p> <p>The nature of the road and its users also leads me to question the validity of the safety analysis in relation to a realistic view on the current safety level of the road. Reasoning below:</p> <p>Crash analysis data available: Period of analysis 2018-22 - during this time there was a number of events impacting type and volume of traffic, along with the condition of the road including; catastrophic bushfires (emergency vehicles only), covid lockdowns (residents and essential workers), upgrades to State Forest Roads (low traffic prior to this due to road pass ability), floods beginning 2020 (creating land slips, deep guttering, washout of gravel and road narrowing).</p> <p>The years since 2022 have seen the reintroduction of tourism, a boom in 4wd and campers, local and visiting, other recreational users of Pokolbin State Forest (hikers, bikers, photographers, sight seers etc) all post covid.</p> <p>Due to the contribution of the above factors and the general nature of an unsealed road with poor infrastructure, the road's current state and usage is vastly different from that seen in the crash analysis period.</p> <p>In addition to the time frame the instance of crash reporting is low due to young drivers with potential BAC readings, uninsured cars being dumped post-crash, 4wd users having friends extract them, not requiring emergency ambulance or fire brigade.</p> <p>In recent years I have noted an increase in crashes on BBR and PMR. Personally, I have seen several crashes including two due to sliding off road edge when attempting to give way to other road users (mid PMR), two head on collisions (1 Mid PMR, 1 BBR), and a further four 'run off' crashes (1 lower, 3 mid PPR).</p> <p>I attribute this increase in crashes to increased road usage, user in-experience and road condition - narrowing of the road, lack of drainage creating rutting, guttering and damage to road pavement (sealed portion) forcing poor driver positioning and over growth of road side foliage meaning poor visibility.</p>		<p>including maximum wait times, and specific resident and business owner input into plans to maintain access to properties.</p> <p>-Further inclusion in the EIS of Pokolbin State Forest in consideration to recreational value and use.</p> <p>-Clarity on passing bays, how they are intended to be used E.g. are they for vehicles to overtake crawling trucks, for trucks to stop to let vehicles traveling the opposite direction pass, for light vehicles to be stopped at traffic control to allow trucks to pass?</p> <p>-Acknowledgement in the EIS of businesses along Pokolbin Mountains and Broken Back Roads and the potential impacts the HTP access might have on these businesses. E.g. interruption to operations, economic disadvantage, disruption to amenity and environment</p>
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<p>Air Quality – Dust and Noise and Vibration</p>	<p>There is an understanding that noise, vibration and dust are a part of any construction, however these specific issues in regard to PMR and BBR need to be managed uniquely and with specific impact in mind.</p>	<p>-EIS Noise and Vibration (16)</p>	<p>Include all relevant affected properties on mapping as sensitive receivers to be</p>

	<p>If beneficial long-term infrastructure is implemented by Energy Co to the impacted roads, the interim disruption to business and way of life would be better received by impacted parties. This would be due to genuinely minimising impacts and increasing safety for the construction and operation of the HTP.</p> <p>It is again disappointing to see homes and business on PMR and BBR access roads excluded from mapping for sensitive receivers for impact from dust and air quality, with business and residential property that are just 21m and 27m respectively from unsealed BBR. It is appreciated that sensitive receiver has been marked for 338 Pokolbin Mountains Road on map 19 of 36 of technical report 8 as a residential property but again recognition of businesses present would assist in being included in relevant management plans.</p> <p>Noise, vibration and dust from passing construction traffic on BBR cause concern for impact on business therefore economic and personal impacts due to HTP access road disturbance.</p> <p>The business being referred to being B&B tourist accommodations specifically sought due to their tranquil and quiet surroundings for guests. With workers expected on site for a 7:00am start this would have vehicles passing at approx. 6:00/6:30am. This disturbance alone would be enough to greatly impact a person's stay, add to this plums of dust and noise from ongoing truck deliveries the impacts could be detrimental to business without sufficient mitigation.</p> <p>It must also be noted that NAC07 in table 16.8 of noise and vibration shows a complete disregard for PMR and BBR access to central HTP, along with a lax approach using data from a location nowhere near the HTP impacted part of Pokolbin.</p>	<p>-Technical report 8 Noise and Vibration assessment Table 16.8 map 19 of 36</p> <p>-Technical report 18 Air quality and greenhouse gas impact assessment.</p>	<p>included in the EIS.</p> <p>Include consultation from individual impacted residents to create specific CAQMP to suit property and use, including mitigation measures.</p> <p>Implement mitigation measures appropriate to surroundings e.g. hedging, window glazing, acoustic blocking fencing and water sprays to minimise dust so the "complaints register" is not necessary.</p>
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Images of Pokolbin Mountains Road and Broken Back Road



Image 1 Head on crash Pokolbin Mountains Road



Image 2 Head on crash Broken Back Road



Image 3 Pokolbin Mountains Road water guttering due to lack of drainage



Image 4 Pokolbin Mountains Road water guttering example 2



Image 5 Pokolbin Mountains Road - 1 day after grading with moderate rainfall



Image 6, 7, 8 Recreational use of Pokolbin Mountains Road and Broken Back Road



Image 9 Tourist accommodation and residence along side Broken Back Road



Image 10 Distance from business to unsealed HTP access