



**PERSONAL OBJECTION THE HUNTER TRANSMISSION PROJECT ENVIRONMENTAL IMPACT STATEMENT (EIS)**  
EPBC ID # - 2024/09874 and Application Number - SSI-70610456

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This submission formally objects to the Hunter Transmission Project EIS. While the project is important for NSW's energy transition, the EIS lacks sufficient rigour, transparency, and detail, particularly regarding impacts on Commonwealth land, threatened species, cultural heritage, and sensitive landscapes.

Key concerns include:

- Inadequate quantification of biodiversity impacts
- Vague mitigation for threatened flora and fauna
- Limited erosion risk analysis for the Singleton Military Area
- Deferral of critical management plans (e.g., ACHMP) to post-approval
- Insufficient assessment of indirect and cumulative impacts
- Weak stakeholder engagement beyond the exhibition period

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<b>1) Acronym</b>	<b>DEFINITION</b>
2) <b>EIS</b>	Environmental Impact Statement
3) <b>HTP</b>	Hunter Transmission Project
4) <b>SMA</b>	Singleton Military Area
5) <b>RAP</b>	Registered Aboriginal Parties
6) <b>ACHMP</b>	Aboriginal Cultural Heritage Management Plan
7) <b>AS</b>	Artificial Scatter
8) <b>BS</b>	Background Scatter
9) <b>NOTAMs</b>	Notice to Airmen
10) <b>EPBC</b>	Environment Protection and Biodiversity Conservation
11) <b>TEC</b>	Threatened Ecological Species
12) <b>ESCP</b>	Erosion and Sediment Control Plan
13) <b>CAQMP</b>	Construction Air Quality Management Plan
14) <b>ha</b>	hectares
15) <b>dB</b>	decibels

## 1. INTRODUCTION

I welcome the opportunity to provide feedback on the Environmental Impact Statement (EIS) for the Hunter Transmission Project (HTP). While I acknowledge the strategic importance of this project in supporting NSW's transition to renewable energy, I wish to raise some objections and personal concerns I have regarding its environmental, cultural, and operational impacts, particularly within the Singleton Military Area (SMA) and surrounding sensitive landscapes.

## 2. COMMUNITY CONSULTATION FEEDBACK

I do acknowledge that EnergyCo has undertaken extensive consultation since 2022, including:

- Engagement with **48 Registered Aboriginal Parties (RAPs)**.
- Reduction in private landowners affected by easement acquisition from **78 to fewer than 20**.
- Hosting **community information sessions and online briefings** during the EIS exhibition period.

**However, there is a need for more information on:**

- How the project will ensure ongoing consultation mechanisms beyond the EIS phase.
- How community feedback fed into the project design.
- If there is any extant community advisory panel during the construction and operation phases.

## 3. ABORIGINAL CULTURAL HERITAGE

The EIS identifies three Aboriginal sites within the SMA:

- High-density artefact scatter (HTP-N-AS32)
- BOP-OS8 – Moderate-density artefact scatter
- HTP-N-BS1 – Background scatter

**There is a clear need to:**

- Include the Aboriginal Cultural Heritage Management Plan (ACHMP) in the EIS.
- Provide evidence that the project will continue to engage Traditional Owners in site-specific salvage decisions.
- Establish and provide proof that **cultural safety protocols** will be embedded in all fieldwork and construction activities.

## 4. HISTORIC HERITAGE

The EIS identifies several Commonwealth heritage items within the Singleton Military Area, including:

- Blacksmith's shop and forge (Vere sector)
- Oakley Estate
- Warringah Stud/Old Myrtle

**The project needs to provide evidence that it has:**

- Conducted structural integrity assessments prior to construction to ascertain potential impacts from vibration.
- Modalities on ground to enforce exclusion zones and non-intrusive construction methods.
- Plans to provide post-construction heritage audits and archival recording.

## 5. BIODIVERSITY IMPACTS AND THREATENED SPECIES MITIGATION

### 5.1 *Vegetation and Threatened Ecological Communities (TECs)*

- **173 ha of native vegetation** to be cleared in the SMA.
- Includes:
  - 117 ha of BC Act-listed of TECs
  - 92 ha of EPBC Act-listed of 2 TECs

### 5.2 *Threatened Flora and Fauna*

- 9 flora species (3 recorded, 6 assumed)
- 19 fauna species recorded or assumed present
- EPBC-listed species with habitat in SMA include:
  - Koala
  - Regent Honeyeater
  - Swift Parrot
  - Gang-gang Cockatoo
  - Green and Golden Bell Frog

### 5.3 *Mitigation Measures*

- Bird diverters (flappers) will be installed on transmission lines to reduce collision risk.
- Vegetation clearing will be timed to avoid breeding/nesting seasons for sensitive species.
- Habitat mapping and impact quantification for 42 fauna and 14 flora species.
- Avoidance of high-value conservation areas through strategic route selection.
- Reduced vegetation clearing by over 200 ha, including 100 ha of TECs.
- Pre-clearance surveys and ongoing monitoring during construction.
- Post-construction rehabilitation including revegetation and erosion control.

### 5.4 *Additional Recommendations*

- Submit all threatened species records to the Atlas of Living Australia to support national conservation efforts.
- Include indirect impact assessments for species using habitat opportunistically.
- Clarify the need for EPBC Act Part 13 permits, especially for flora/fauna relocation or sample collection.
- Ensure qualified ecologists oversee all mitigation activities, including bird diverter placement and fauna handling.
- Publicly report biodiversity-monitoring outcomes, including compliance with mitigation measures.

## 6. EROSION AND LANDFORM SENSITIVITY

The project traverses areas with high erosion potential, particularly within gullies, creek lines, and disturbed soils in the SMA.

### Questions:

- Seeing that vegetation clearing and earthworks may destabilise slopes and increase sedimentation into waterways, how do you plan to manage this? The plan I see in the EIS does not factor a full assessment of the cumulative impact of this project, in combination with other infrastructure and mining activities in the region.
- Knowing that construction access tracks and tower pads risk long-term erosion if not properly managed, what is the plan for long term eventuality of erosion and traceability to the project? How will we hold you to account post the project period?
- Similar to the above, the disturbance of TECs and riparian zones could exacerbate erosion and reduce ecological resilience, how will you remediate the impact on communities and their habitat?

### Recommendations:

- Develop and implement a site-specific Erosion and Sediment Control Plan (ESCP).
- Use erosion-resistant materials and stabilisation techniques for access tracks.

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- Avoid clearing in gully systems and steep terrain where possible.
- Conduct regular erosion monitoring, especially after rainfall events.
- Include post-construction rehabilitation with native species and erosion control structures.

### **7. NOISE, VIBRATION AND AIR QUALITY**

During construction, noise and vibration are inevitable.

#### **Concerns:**

- With noise exceedances of up to **22 dB** predicted at sensitive receivers, how would you mitigate the impact on biodiversity?
- Vibration risks to heritage structures and fauna.
- How do you plan to mitigate impact from dust generation from earthworks and vehicle movements on their receptors?

#### **Recommendations that might work but were not visible:**

- Limit high-noise activities to standard hours, especially near sensitive habitats.
- Implement real-time monitoring and public reporting for noise and vibration.
- Enforce the Construction Air Quality Management Plan (CAQMP).
- Notify nearby residents of high-impact activities.

### **8. AVIATION SAFETY**

The project intersects Restricted Area R564A, near Dochra Military Aerodrome.

#### **Questions:**

- How have you coordinated with Defence aviation authorities throughout before and during consultations?
- Will you be providing advance notification of crane, drone, and helicopter use to the community?
- Will transmission line data be included in aviation charts and NOTAMs?

### **9. CONCLUSION**

The Hunter Transmission Project is a transformative initiative for NSW's energy future. However, its success must be balanced with responsible environmental stewardship, cultural respect, and community engagement. I urge EnergyCo and the Department of Planning to consider these recommendations seriously and provide me with some answers. My aim is to ensure that the project proceeds in a way that protects the region's unique heritage, biodiversity, and landform stability.