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Pokolbin NSW 2320

21 September 2025

Department of Planning, Housing and Infrastructure

Locked Bag 5022

Parramatta NSW 2124

**SSI-70610456 Submission on the Exhibition of Critical State Significant Infrastructure:
Hunter Transmission Project**

I object to the application SSI-7061045, for the following reasons:

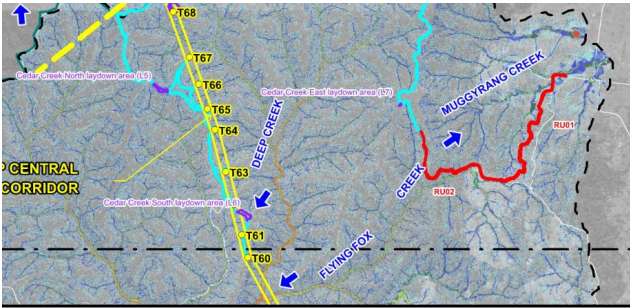
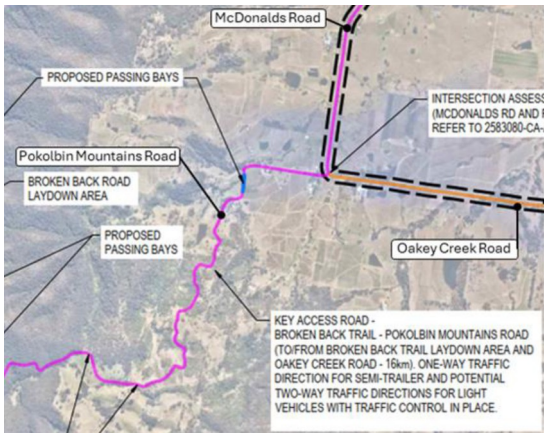
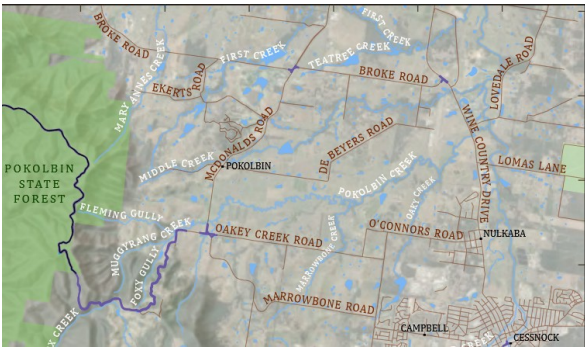
1. The EIS has inadequately defined the project, including in relation to the use, upgrades, modifications of Pokolbin Mountains Road. Therefore the EIS cannot have properly assessed the potential impacts, including traffic, noise, air quality, surface water and soil and erosion. It follows that the proposed mitigation measures are unlikely to be adequate. The root cause is that no concept design of the upgrades required to the unsealed portion of the Pokolbin Mountains Road have been undertaken.
2. The SIA is inadequate as it failed to identify themes related to design basis and concept design for Pokolbin Mountains Road and post approval management of spray drift from viticultural spraying that were discussed during the consultation process.
3. There is a gap in the technical assessment of the EIS in relation to erosion and sediment controls, which are not assessed. The EIS has not considered existing local constraints on soil and erosion on Pokolbin Mountains Road.
4. Noise and Vibration Impact Assessment (NVIA) is based on invalid inputs and assumptions and does not assess the passing bays and other upgrades to Pokolbin Mountains Road.
5. The Air Quality and Greenhouse Gas Impact Assessment (AQGGIA) does not assess the impact to commercial and residential receptors along Pokolbin Mountains Road (including within 50m of the upgrade of the road).

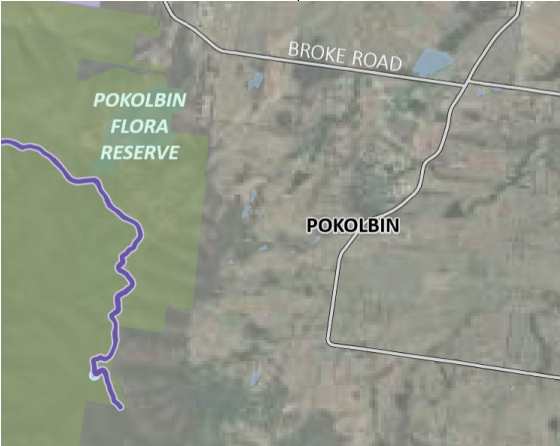
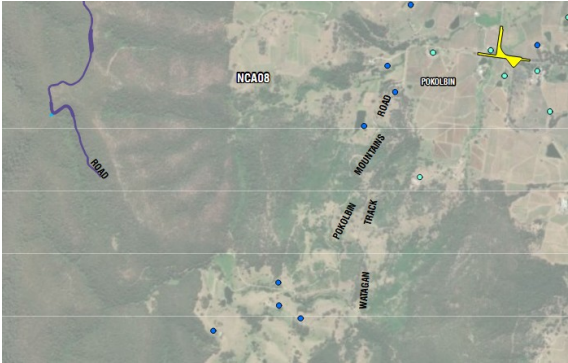
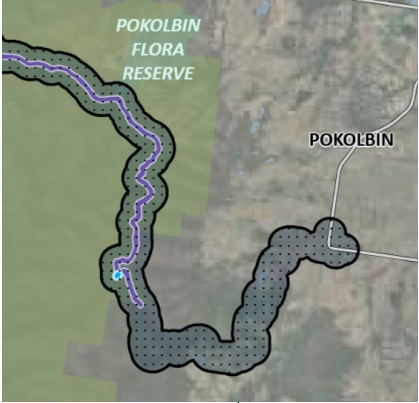
I object as a local resident, landholder, local business operator, member of community groups and as a member of the Pokolbin Mountains Road Resident Landholder and User group (PMRRLU).

Project description

The EIS inconsistently defines and describes the project in relation to Pokolbin Mountains Road. This includes that passing bays that are identified as required as part of the project in the Traffic and Transport Impact Assessment (TTIA) but are not assessed in the Soils and Land Assessment (SLA), Surface Water Impact Assessment (SWIA) and Noise and Vibration Impact Assessment

(NVIA). The Flood Impact Assessment (FIA) defines the project as including a full upgrade along the length of the unsealed part of Pokolbin Mountains . The Air Quality and Greenhouse Gas Impact Assessment (AQGGIA) includes the upgrades to Pokolbin Mountains Road in its study area, but then fails to identify receptors. Some of the inconsistencies in the EIS are summarised as follows:

Technical Assessment	Treatment of Pokolbin Mountains Road
Flood Impact Assessment (FIA)	Upgraded along the full length of unsealed road (refer to Figure B.1)  ELEMENTS - Transmission line tower and identifier - New or upgraded access tracks - Road upgrade and identifier - Intersection upgrade and identifier - Construction support site and identifier - Laydown area and identifier - Helpaid site and identifier FLOODIN
Traffic and Transport Impact Assessment (TTIA)	Key Access Road – One water traffic direction for semi trailer and potential two-way traffic for light vehicles with traffic control in place (refer to Figure 5.10)  McDonalds Road PROPOSED PASSING BAYS Pokolbin Mountains Road BROKEN BACK ROAD LAYDOWN AREA PROPOSED PASSING BAYS Oakey Creek Road INTERSECTION ASSES (MCDONALDS RD AND F REFER TO 2583080-CA-) KEY ACCESS ROAD - BROKEN BACK TRAIL - POKOLBIN MOUNTAINS ROAD (TO/FROM BROKEN BACK TRAIL LAYDOWN AREA AND OAKEY CREEK ROAD - 16km). ONE-WAY TRAFFIC DIRECTION FOR SEMI-TRAILER AND POTENTIAL TWO-WAY TRAFFIC DIRECTIONS FOR LIGHT VEHICLES WITH TRAFFIC CONTROL IN PLACE.
Soils and Land Assessment (SLA)	Pokolbin Mountains Road is identified as an “Access track / access road” (refer to Figure 9.3), however the passing bays are not identified and assessed.  Legend - Operation impact area - Project impact area - Access road / Access track - Construction support site - HTP corridor - Laydown area - Water Features - NPWS Reserves - State Forest BROKE ROAD FIRST CREEK TEATREE CREEK BROKE ROAD LOVEDALE ROAD LOMAS LANE O'CONNORS ROAD NULKABA CAMPBELL CESSNOCK POKOLBIN MOUNTAINS ROAD BROKE ROAD FIRST CREEK TEATREE CREEK BROKE ROAD LOVEDALE ROAD LOMAS LANE O'CONNORS ROAD NULKABA CAMPBELL CESSNOCK

Surface Water Impact Assessment (SWIA)	Not assessed (refer to Figure 2.2) despite the heavy vehicle route and road upgrades proceeding along the full length of Pokolbin Mountains Road. 
Noise and vibration impact assessment (NVIA)	Not assessed (refer to Figure 2.2) despite the heavy vehicle route and road upgrades proceeding along the full length of Pokolbin Mountains Road.  
Air quality and greenhouse gas impact assessment (AQGGIA)	Pokolbin Mountains Road is identified in the Study Area (refer to Figure 3.4) however residential and commercial receptors (including within 50m) of the unsealed section of Pokolbin Mountains Road are omitted from the assessment (refer to Figure B.5).  

The EIS has inadequately defined the project, including in relation to the use, upgrades, modifications of Pokolbin Mountains. Therefore the EIS cannot have properly assessed the potential impacts, including traffic, noise, air quality, surface water and soil and erosion. It follows that the proposed mitigation measures are unlikely to be adequate.

The root cause of the inadequate project definition and assessment is that no concept engineering design (including design basis, horizontal and vertical geometry, drainage) of the upgrades required to the unsealed portion of the Pokolbin Mountains Road have been undertaken. I met with EnergyCo 27 June, 18 July (as part of a community meeting held at Pokolbin Community Hall), 24 September and 14 October and confirmed in writing (email to EnergyCo 20 October 2024) my concerns as a landholder, and also as a member of the PMRRLU, in relation to the level detail of planning of any upgrades to Pokolbin Mountains Road as part of the HTP. The need for upgrades have been identified from the beginning of the consultation process, such as *Shaping the Hunter Transmission Project* (May 2024 pp 30) which states "Local roads including Pokolbin Mountains Road will be used and most will need to be upgraded". I had concerns (that have now been confirmed by the inadequacy of the EIS) that the level of detail presented in the EIS for the HTP would not adequately address the relevant Planning Secretary's Environmental Assessment Requirements. The inadequacy of the EIS in this aspect is summarised in the following table:

Recommended SEARs	Question raised by me to EnergyCo in writing 20 October 2024	Inadequate information presented in the EIS
<i>"details of measures to mitigate and / or manage potential impacts including a schedule of all required road upgrades (including resulting from high risk heavy vehicles requiring escort traffic haulage routes), and any other traffic control measures, developed in consultation with the relevant road and / or rail authority":</i>	<i>What is the design basis for the required road upgrades on Pokolbin Mountains Road?</i>	Not addressed. No design basis has been presented in the EIS.
	<i>Will the community (including through PMRRLU) have the opportunity to be consulted on the design basis (width, pavement, flood immunity, design speed, edge protection etc)?</i>	Not addressed. No design basis has been presented in the EIS and community has not been consulted.
	<i>How does EnergyCo propose to identify the dilapidation of the road as a result of construction activities and rectify the likely damage to the road (as was seen as a result of recent construction works by NSW Forestry and Soil Conservation service)?</i>	Dilapidation studies are identified in the TTIA. EnergyCo must provide an independent peer review of the pre and post dilapidation studies to adequately resource Cessnock City Council. The studies must consider likely failure mechanism of the damage to the underlying pavement structure that is likely to be activated during construction and will not be adequately repaired by patching of wearing course. The cost of the likely full pavement depth rehabilitation required due to construction traffic must be borne by EnergyCo.

• "details of the ongoing maintenance works required to service assets, outlining the measures to maintain the road."	How does EnergyCo propose to support Cessnock City Council to maintain Pokolbin Mountains Road after construction, with ongoing additional traffic for servicing of the assets accessed via Pokolbin Mountains Road?	The TTIA dismisses the operational impacts to road condition as “<i>unlikely to have a noticeable impact on the road pavement condition throughout the traffic and transport study area.</i>” while failing to assess the specific changes to Pokolbin Mountains Road. The assessment must consider the cumulative affects of policies of the NSW Government affecting the use of Pokolbin Mountains Road, including Forestry, communications towers and changes to recreational use of the road. The resources of regional Cessnock City Council to continue to subsidise externalises from metropolitan areas must include consideration of the potential financial adjustments through the Energy Policy Framework including the Benefit Sharing Guideline.
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EnergyCo have not satisfactorily explained why no concept design of upgrades to Pokolbin Mountains Road has been prepared to inform the EIS. EnergyCo can estimate the number of towers, quantity of construction materials, number of vehicle movements, likely vehicle dimensions, undertake existing survey, pavement investigations, well before a design and construct contractor is engaged.

The project must be properly defined, including with design basis and concept design for Pokolbin Mountains Road, in order of the impacts to adequately assessed and for the Minister for Planning and Public Services to have any confidence that the mitigation measures will be sufficient.

In addition to addressing this inadequacy, Due to the inconsistency to date in the project definition and description in Pokolbin Mountains Road, EnergyCo must commit to interpreting the mitigation measures presented in the EIS, response to submission, commitments and post approval management plans in the most conservative way in regard Pokolbin Mountains Road, to the full extent of any doubt or ambiguity. For example, Pokolbin Mountains Road should be treated as both a key access road and access track (whichever provides more mitigation for local residents in each aspect of impact) and also any passing bays should be treated as laydown areas and construction support areas (whichever provides more mitigation for local residents in each aspect of impact).

Social Impact Assessment

The SIA acknowledges the in person semi-structured interview with Pokolbin Mountains Road residents, Pokolbin Mountains Road Residents Group [sic; PMRRLU] and Vineyard farmers and business operators that occurred around 11 and 12 December 2024. The SIA is inadequate as it

failed to acknowledge other meetings with EnergyCo with members of the PMRRLU including 27 June, 18 July (community meeting held at Pokolbin Community Hall) 24 September and 14 October, and therefore has not considered all of the relevant information. This includes the SIA failing to identify themes related to existing drainage and erosion constraints, design basis and concept design for Pokolbin Mountains Road and post approval management of spray drift from viticultural spraying that were discussed during the consultation process.

The SIA must be revised include all the relevant information, including themes design basis and concept design for Pokolbin Mountains Road and construction dust and spray drift interactions with adjacent vineyards along the unsealed and track out sections of Pokolbin Mountains Road.

Surface Water Impact Assessment and Soil and Land Resource Assessment

The EIS does not address the SEAR related to “A description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with Managing Urban Stormwater: Soils & Construction (Landcom 2004)” and there appears to be gap between the two relevant technical assessments.

Section 1 of the SWIA identifies that the SEAR related to “A description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with Managing Urban Stormwater: Soils & Construction (Landcom 2004)” is addressed in the SLRA. Section 1 of the SLRA does not identify that it addresses this SEAR relation to soil erosion. Therefore there is a gap in the technical assessment of the EIS in relation to erosion and sediment controls.

The Project Impact Area defined in the SLRA is limited to the access track from the top of Pokolbin Mountains Road (as shown in Figure 2.1 of the SLRA) but does not include Pokolbin Mountains Road, or the passing bays shown in Figure 5.10 of the TTIA. Therefore the EIS has not adequately addressed the relevant SEARs as the erosion and sediment control of the passing bays on Pokolbin Mountains Road and other upgrades to Pokolbin Mountains Road have not been assessed.

Due to this inadequacy in assessment scope and failure to identify relevant themes in the SIA, the EIS has identified and properly considered the existing constraints in relation to erosion and soil on Pokolbin Mountains Road, The project has the potential to increase the existing erosion and soil loss that occurs due to normal rainfall conditions on Pokolbin Mountains Road, as shown in the photo below.



Figure: Erosion and sediment loss due to drainage constraints near proposed passing bay location on Pokolbin Mountains Road, not identified or assessed in the EIS (photo June 2025) [edited for privacy]

The EIS must properly define the project in relation to upgrades and passing bays on the unsealed section of Pokolbin Mountains Road so that the impacts in relation to soil and erosion are properly assessed and detailed mitigation measures developed. The assessment must include existing drainage constraints that result in erosion and soil loss.

Given the evidence of lack of valid information used in the EIS, the post approval conditions must also require consultation with the PMRRLU on the project specific Soil and Water Management Plan (SWMP; or Operational Environmental Management Plan) and related Erosion and Sediment Control Plan (ESCPs), water quality monitoring plan (WQMP) and stormwater management plan (SWP). These plans should also consider the outcomes presented in Table 5.3 of the FIA.

Noise

Noise and Vibration Impact Assessment (NVIA) is based on invalid inputs and assumptions and does not assess the passing bays and other upgrades to Pokolbin Mountains Road.

The NVIA is based on Noise Catchment Area 08 (NCA08) from observations at L02 (Mount Baker Road Mt View) and L04 MF1 Road, Millfield). This noise catchment is invalid as a basis for assessment of Pokolbin Mountains Road as these locations do not include the recreational access to Pokolbin Mountains Road and the Pokolbin State Forest.

The existing traffic volume for Pokolbin Mountains Road presented in Appendix B-3 of 1 LV peak per hour is not reflective of recreational access to the Pokolbin State Forest. The NVIA has not assessed the passing bays identified in the TTIA. Passing bays must be assessed similar to laydown areas or construction support sites.

The proposed upgrades to Pokolbin Mountains Road or the construction of any passing bays should be assessed with background noise levels based on the peak traffic levels during periods of peak existing road use on Pokolbin Mountains Road (Friday and Saturday).

Air quality

The Air Quality and Greenhouse Gas Impact Assessment (AQGHGIA) fails to properly evaluate the dust impacts from heavy vehicle movements along unsealed local roads, specifically Pokolbin Mountains Road. Despite including this road within the study area (refer to Figure 3.4), the assessment completely neglects to map or consider numerous critical receptors—residences, businesses, livestock water sources like Foxy Gully and Muggyrang Creek, and public areas such as the Great North Walk (refer to Figure B.5). These omissions render the receptor assessment wholly inadequate. The moment vehicles transition from sealed McDonalds Road to the unsealed section of Pokolbin Mountains Road, dust impacts begin, yet the assessment deliberately ignores this section of the route.

The proposed measures are reactive, relying on community complaints and inspections after dust becomes a problem. That is not management; it is avoidance. Proactive, enforceable dust suppression—such as routine water application on dirt roads—must be required in the Construction Air Quality Management Plan.

Conclusion

I object to the application SSI-7061045 for the reasons set out above. In addition to addressing the inadequacies identified above, contributed to by the inadequate project definition and description of the project aspects related to Pokolbin Mountains Road, EnergyCo must also commit to:

- Interpreting the mitigation measures presented in the EIS in the most conservative way in regard Pokolbin Mountains Road, to the full extent of any doubt or ambiguity.
- Consultation with the PMRRLU on post approval management plans including: Soil and Water Management Plan, Operational Environmental Management Plan, Erosion and Sediment Control Plan, Water Quality Monitoring Plan, Stormwater Management Plan, Construction Noise Management Plan and Construction Air Quality Management Plan

Sincerely

Tyler Tinkler