

Colin Payne  
[colinpaynepsych@bigpond.com](mailto:colinpaynepsych@bigpond.com)  
0401747596

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Attn: The Honourable Paul Scully MP, Minister for Planning and Public Spaces  
C/ Anthony Ko Project Contact Planner, DPE  
Dept of Planning and Environment  
Locked bag 5022  
Parramatta NSW 2124  
Email: [Anthony.Ko@planning.nsw.gov.au](mailto:Anthony.Ko@planning.nsw.gov.au)

Dear Minister

**Re: Submission of Objection by Colin Payne to the Proposed Oven Mountain Pumped Hydro Storage Proposal: Application Number SSI 1242297, EPBC ID Number2020/8850, Assessment Type; Critical State Significant Infrastructure. Exhibited as: ( EXH-62250958)**

I appreciate your making available and exhibiting the DA, EIS and accompanying documents and the opportunity to make a **Submission of Objection** to the Proposed Oven Mountain Pumped Hydro DA.

From review of the DA, EIS, discussions with the proposer, review of documents and information, and knowledge of the valley, **I have serious concerns.**

**I am a long time resident of the Macleay Valley and have spent years in the stunning areas concerned with the proposal. I have spent time on the Carria plateau conducting 4 and 5 day Horseriding Treks, and Canoeing trips down the rivers from the Chandler, through West Kunderang, down the Macleay. My wife and I operated for 9 years, a successful Business in the upper Macleay Valley, accessing the tablelands and Carrai and the rivers.**

I agree with, and fully support the submission to this EIS from **SAVE OUR MACLEAY RIVER** group.

I have many **serious concerns** and find this EIS inadequate and insufficient in cost assessments, in the amount of land destruction, in soil and rock testing, in the dangers of antimony and arsenic **again. This is unacceptable.**

### **1. Community engagement**

The proposal to disturb a remote area upriver surrounded by National Heritage areas is distressing. These areas were declared as such, to protect the wilderness, animals, flora and the absolute beauty and remoteness, to preserve for the future and for hikers, and exploring. The National trail is also endangered by its closeness to the site.

Community Consultation by OMPH has been minimal and their shop front also minimally used .

OMPH has only presented 1 meeting, a poorly attended one, which was not informative and descended into arguments as people had no idea what the proposal actually was about.

**\*\*OMPHS Pty Ltd** has offered inadequate community information and consultation . Their statements about this, in their EIS, are exaggerated and grossly inflated. On most occasions, very few people came to ask for information. I was at several sessions.

## **2.Size , costs, major works not addressed**

Size of proposal and the Project is extremely large scale; with environmentally intrusive large foot-print engineering works, involving; massive earth-works for roading, tunnels, reservoirs with 70m high walls,bridge(s) across the Macleay and transmission lines: This in such an isolated, steep, erosive and significant natural 'Gorge Country' area with high 'experience values.' 100km from Kempsey via public road with **major** access issues. Also they want to build a huge camp for 600 workers-- toilet waste,building waste, food waste and rubbish.

These workers will be out of area , specialist, trained workers... ( although OMPH states locals will be hired and trained)--very few will be employed from local area.

OMPH has not addressed many important issues that need to be considered before any determination is made.

I have concerns this is being pushed through by gov't policies, ie- inclusion in NE REZ and North Coast Water Strategy, BEFORE the DA and EIS.

The Minister needs to come to the area, travel the narrow winding one lane roads and experience this area.

## **3. Hidden costs**

There appears to be a lot of costs omitted in the proposal . These include massive roadworks, potential landslips etc . Bridgeworks etc etc.

There are huge cost blowouts already on other similar projects- Snowy 2 and Kidston Mine in QLD. We need to learn from past experience.

## **4.Land Disturbance**

I have grave concerns for the massive disturbance of the land, the health of the river, the water quality, and the downstream effects of this proposal. This is the **second oldest** River valley in Australia, **ninth in the world**, and geologically, it predates the Uplift of the Tablelands escarpment.

“ OWRNP and The GRA includes the most extensive areas of subtropical rainforest in the world. The forests have high conservation value, providing habitat for rare and threatened species of plants and animals, some with restricted distributional limits. Additionally, it contains evidence of geological history associated with the breakup of the supercontinent of Gondwana. The breakup of Gondwana occurred in stages that commenced during the Jurassic period, approximately 180 million years ago, attributes

identified as contributing to the values of the World Heritage listed Gondwana Forests.”( from EIS ).

This a remote area - huge destruction will occur trying to put in new heavy machinery road access . They are wanting a new bridge, roads UP the gorge face to access top dam, access roads on Carrai plateau, construction of huge camps for workers, again wide access roads for huge machinery, low loaders, concrete batching. Also kms of forest removal to put through transmission lines.

The area is serviced by 2 narrow, dirt roads with sharp bends, and 2000 ft drop off on the Armidale side - one road from Armidale end, one from Kempsey end.

#### **4.Roads and Construction**

OMPH has suggested responsibility for huge heavy vehicle access is the responsibility of Kempsey and Armidale shires funded by OMPH. This is ridiculous . These shires have their own huge workload, no machinery or vehicles of appropriate size, no future need for such one-purpose vehicles, and the roads are so inappropriate. A vehicle must back up into the mountain, on most of the Armidale road, for 2 ordinary vehicles to pass! This is all inappropriate development for this valley and these 2 roads..at least 175heavy vehicle and OSOM trips a month Stated by OMPH- construction is estimated by them as 5-6 years.

The destruction for roads ,dams, camps, 600 m of gorge rock face drilling, is all unsuitable, unmanageable, and must be **reviewed and refused.**

The government created National Parks and National Reserves in this area --to preserve its remoteness and to preserve our future, the future of our endangered animals, birds, vegetation as well as non-endangered species, water catchment and vegetation for our nation.

Quoted from OMPH EIS ‘Additionally, during construction, there is the potential that heavyvehicles and the use of helicopters may impact the enjoyment of recreation users and will be considered as part of the Project's CEMP.for 5-6 years” !

#### **4.Endangered species**

I also have grave concerns for the loss of endangered species .Loss of 328 ha as minimal loss of habitat and vegetation for threatened species is a huge impact.

Short-term minor decrease in surface water volume and flow within sections of the Macleay River and associated tributaries, as a result of reservoir construction and filling, has the potential to impact key fish habitat and aquatic habitat more broadly, as well as impeding fish passage.

FurtherEffects: Erosion, siltation, scouring and degradation of the riparian zone, including an increase in instability of waterway banks and beds because of construction activities. The area impacted will also include adjacent flora and fauna.

## 5. River Flow

The flow and height of The Macleay River is unpredictable. Armidale regional Council is planning on substantially increasing their water supply and this of course WILL REDUCE our river flow. The whole catchment for our river must be considered, and our river protected.

Water, it is stated, will only will be taken at times of high flow levels.

**What is the height? And why do they talk about the dangers on the river flow and aquatic environment ?**

**Are OMPH presuming to take when flow is low?**

**What is the flow height regulation?**

**Who is monitoring?**

## 6. Alternatives

The alternatives available must be addressed by the Minister as scientific progress is a daily occurrence and this project will very likely be outdated before it is completed.

**Pumped hydro is a green energy source but the massive destruction of a wild and remote area like this is unacceptable.**

Massive destruction to get to 1 piece of private land in very inaccessible country.

This must be reconsidered and not just given a green light because it is green energy.

The huge costs to the communities and the environment --- the company is dependent on electricity market prices and, can and will withhold potential energy creation until they see a profit. **This is not a project for their profit.**

**Alinta- the owner of the project is foreign owned and should not control our power .**

Large-scale batteries; (e.g., the proposed 'Rangebank' project by Shell and Mornington BESS battery by Maoneng which can store 200MW (400MWh) for some \$200 - \$400 million.

*These, switchable in series & parallel, would require 4 units to provide 800MW over 8 hours*

*(4 hours short of OPMS' proposal) at a cost of \$1.2 billion.)*

Batteries can be located close to substations and green energy supplies anywhere, with minimal environmental disturbance, less hydraulic, mechanical and transmission losses; and can be recycled and upgraded as technology improves. *(They have shorter (20-30year) life-span, but with the rate of battery technology advance this is likely a benefit.*

Or:

**b) Use of 'Brown-field' sites for Pumped Hydro, such as, coal mines in the Hunter Valley, would not require massive disturbance in this natural area and be closer to existing Grid, roads , rail.**

## 7. Erosion management

OMPHS soils and rock testing has been INSUFFICIENT!

This steep gorge country is open to extensive erosion . Through historical leaching and through our and uni testing regimes, we know there is leaching of AS and Sb from the rocks into the water courses. This has affected the Bellbrook water supply previously and scientists have surmised that in high flood times the settled AS and SB is stirred up from deep in the river base, and so enters our town's and our villages' water supplies.

THIS IS UNACCEPTABLE, and **more** testing needs to be done on the potential drilling through 600m of granite on the gorge rock face, and on the rocks and soil surrounding all areas of potential disturbance... Also the potential for further mineral leaching, as the rock is proposed for the dam walls.

Dispersible soils are also a threat to our water supplies and testing for this has been insufficient.

### **8. Monitoring**

**Who** is responsible for monitoring the Company's proposed mitigation strategies and for their implementation?

- For adhering to and consulting the aboriginal communities- which are throughout our valley- not just at the George's creek and Bellbrook areas
- For Antimony and Arsenic being released from the massive land works and road re-construction.
- For impact on vegetation,.. threatened species, groundwater leaching, ...soil erosion,.....
- For approved river levels to allow 'dam filling' or 'top-up',....
- For water testing, for mineral dispersible soil problems
- For our water sources being PROTECTED

This has not been addressed and appears unconsidered by OMPH.

Thank you for considering this Submission of Objection and I look forward to your important consideration of these major concerns so we can achieve a good result for our community and for our environment.

Yours Sincerely,

Colin Payne B Psyc.  
colinpayneppsych@bigpond.com  
0401747596