

# Rupert G.H. Milne Home, Registered Landscape Architect

## B. App. Sc. Landscape Design. AILA

Date: 15<sup>th</sup> October 2023

Milnegunya,  
174 Mungay Creek Road,  
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Attention: The Honourable Paul Scully MP, Minister for Planning and Public Spaces.

C/- Anthony Ko, Project Contact Planner, DPE

Department of Planning and Environment

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By email: [Anthony.Ko@planning.nsw.gov.au](mailto:Anthony.Ko@planning.nsw.gov.au) and by DPE Portal (if able).

Dear Hon. Paul Scully, Minister for Planning (and Public Spaces),

**Re: Submission of Objection by Rupert G H Milne Home to the Proposed Oven Mountain Pumped Hydro Storage Proposal: Application Number SSI-12422997, EPBC ID Number 2020/8850, Assessment Type; Critical State Significant Infrastructure. Exhibited as: (EXH-62250958).**

Thank you for making available and exhibiting the DA, EIS and 27 Appendices for review, as well as the opportunity to provide this 'Submission of Objection' to the proposed Oven Mountain Pumped Hydro Storage CSSI Development Application. Though I advise that it was impossible for me to obtain the EIS and Appendices from the DPE Planning Portal due to technical difficulties and had to resort to requesting a copy of the documents from the Proponent on a 'thumb-drive.' I understand others have also had serious difficulties with the Exhibition processes.

As background; I have been a Landscape Architect based in the Macleay since 1983 and was on the Macleay Catchment Management Committee from 1993 to 1996 and have, through long experience, a close understanding of and commitment to the catchment. - While currently Secretary of Save Our Macleay River incorporated and am privy to the group's concerns and Submission of Objection; I make this separate Submission of Objection both personally as a resident and as a Landscape Architect.

I congratulate the group for their collective extensive research, review of the massive EIS documents, consideration of the issues and, importantly, their conclusions. In this, my Submission of Objection; I support all their concerns and conclusions on matters in their Submission of Objection. And specifically support that the OMPHS Consultation process has not been appropriate; with lack of 'Presentation(s)' of the Project proposals for the communities to ask the right and relevant questions. As well as the need for further assessment, also advised in the EIS, of many serious matters, prior to Determination.

I am also concerned that the Project Proposal has understated the cost, left out significant elements of the Project and not disclosed costings or likely not included contingencies for the risk of the Project having technical or other unforeseen difficulties raising the cost to benefit further. As demonstrated by other Pumped Hydro projects, e.g., Snowy 2 & Kidston.

While it seems unlikely that the Project DA will be Refused/Declined (not Approved), due to DPE considering the Project being Critical State Significant Infrastructure, under Part 5 of the EPA Act: (I.e., indicating support for the Proposal)

I submit that this DA be Refused/Declined and not Approved for the following reasons:

- § The Project's scale in this isolated and inaccessible area and amount of disturbance proposed makes this expensive to develop and will adversely impact on such a natural area surrounded by such significant natural assets, Macleay River water quality as well as existing infrastructure.
- § Decommissioning of the Site at 'end of life' (un-viability or long term) in such a natural area with high environmental, scenic and recreation values will not and can never be restored.
- § There are already more efficient and cost-effective and less disturbing 'Alternative' methods of longer-term storage of electricity with less energy loss-factors. For example; Big Battery technologies; which develop a-pace and will be even more efficient by the estimated 5years timeframe for the Oven Mountain facility is estimated to come on-line and are largely recyclable.



- § Alternative less disturbing and 'Brown-field' sites are available for Pumped Hydro are not investigated: and should be addressed in submissions to the NSW DPE Minister; as it is the State's role to assess alternatives strategically. Not the Proponent. – *But they should have, in their feasibility assessment.*
- § 'The Need' for this project is greatly over-stated and over-estimated given the current and near future alternatives, with impacts being generally under-stated.
- § The 'Business case' for the stated \$1.8billion project is highly questionable; given Snowy 2 and other pumped hydro project examples have all had massive cost overruns, delays and 'unforeseen' problems. And the cost estimate provided is likely only for 'The Site' and does not consider transmission costs. The Kempsey/Armidale Road upgrades needed are stated as being "paid for by the Project, but constructed by Council(s);" these costs are stated as not included in the Project costing and cost details are withheld, cited as due to 'Commercial in Confidence,' Off-site or associated public infrastructure maintenance costs to the tax-payer (i.e.: 'hidden' costs) are also not addressed in the EIS. If all these were included in the budget for cost/benefit and feasibility, the project would very likely not 'stack-up'; even if it does not now! – *The Lendlease proposal for Pumped Hydro here, 20 odd years ago, was dropped because 'it did not stack-up' and this when alternatives did not provide so many other alternative electricity storage (battery) options.*

Should the Proposal not be Refused/Declined, I submit the DA Determination be Deferred for the following reasons: The Proposal defers address of many vitally important matters to the 'detail design stage or later;' many of which need to be resolved at this DA stage to ensure all important matters are fully addressed for important risk assessment, over-all feasibility, and holistic cost/benefit analysis in the Assessment process, prior to Determination. These include but are not limited to:

- § Construction Traffic Management Plan,
  - § Additional Geology/Geochemical testing;
  - § Erosion and Sediment Control Management Plan,
  - § River level/flow to permit uptake,
  - § Social Impacts (Medical, Policing, School zones),
  - § Aboriginal Cultural Heritage Management Plan;
  - § Waste Management Plan,
  - § Project costings, and
  - § Decommissioning Plan at end of construction and 'End of Life.'
- etc...

I also submit that The Proponent's address of these deferred matters and plans, also need to be re-exhibited for comment/submissions - or at least to all submitters and stakeholders - for comment and submissions so that the Project can be holistically (re)assessed for all risk of impacts and real cost/benefit by the community; prior to Assessment for Ministerial Determination and for developing appropriate Conditions of Consent before Approval.

I advise that I am not objecting to the use of Pumped Hydro Storage as a battery to support the grid in a 'greener' and more sustainable way. It has its place, as outlined in Alternatives above. I am objecting to this Proposal in this location.

Thank you for the opportunity to provide this Submission of Objection, and look forward to working with all involved to achieve a good rational result – preferably by Refusal/Decline of the DA - for the Macleay, catchment, economy, environment and community in which we live and value, as well as the State's taxpayers and constituents. And remind that Government has a 'duty of care' for those who they represent and serve in public office.

I may add to this Submission, in the 4weeks following the closing date for submissions; advised by DPE as permitted.

Should you have any queries or concerns regarding my Submission of Objection; please contact me at any time.

Yours Faithfully



Rupert G.H. Milne Home,  
Registered Landscape Architect.

