

14 July 2025

Kurtis Wathen
Senior Assessment Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Re: Lake Lyell Pumped Hydro Energy Storage Project (SSI-77018220)

Dear Kurtis,

1 Background

EnergyAustralia initiated the development of the Lake Lyell Pumped Hydro Energy Storage Scheme (the project). A Scoping Report (EMM, July 2023) for the project was prepared and Secretary's Environmental Assessment Requirements (SEARs) were issued on 22 August 2023 and subsequently re-issued on 1 November 2024, to align with the Minister for Planning and Public Spaces (Minister) declaration for the project to be Critical State significant infrastructure (CSSI) (which occurred in June 2024). As CSSI, the project is a development that is essential for the State for economic, social, and environmental reasons.

The project was also referred under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and has been deemed a controlled action. Supplementary SEARs accompany the SEARs issued by DPHI.

Since lodgement of the Scoping Report, a concept design for the project has progressed and the principles of avoidance and minimisation of impacts have been applied throughout development of the Environmental Impact Statement, informing the refinement and optimisation of the project.

This letter has been prepared to inform the Department of Planning, Housing and Infrastructure (DPHI) of proposed minor changes to the project description for the Lake Lyell Pumped Hydro Energy Storage Scheme, as well as change in the proponent seeking to develop the project.

2 The Applicant/Proponent

Since the lodgement of the Scoping Report and following progression of concept design and Environmental Impact Statement (EIS), EnergyAustralia and EDF power solutions Australia have entered a partnership to deliver the project. The partnership entity is now the proponent of the project:

Lake Lyell Project Pty Ltd
ACN: 688 084 899
ABN: 24 688 084 899
'Tenancy 3' Level 27, 530 Collins Street, Melbourne VIC 3000

3 Project description refinements

3.1 Project operations

At the time of lodgement of the Scoping Report, the project was anticipated to provide between 300 and 350 megawatts (MW) of electricity generating capacity for up to 8 hours during peak demand. Ongoing design development and refinement of the project has confirmed the core operating parameters, with the project anticipated to store up to 3,080 megawatt hours (MWh) of energy and generate at 385 MW for 8 hours. However, the project will now also have the capability to generate up to around 440 MW for a shorter period. The increase in peak generating capacity allows the facility to contribute valuable network support on short notice with up to 55MW additional generation, synchronous inertia, stability and frequency response during periods of unexpected or high market demand.

3.2 Temporary worker accommodation

The Scoping Report identified a range of supporting services and infrastructure required for the construction and operation of the project and indicated that an '...accommodation strategy would also be developed as part of the ECI and design phase'.

Ongoing design development has determined that the project's peak workforce is expected to be approximately 600 full-time equivalent workers, 80% of which are expected to require temporary accommodation. For this reason, temporary accommodation for approximately 500 workers is required near the site. The workforce accommodation camp will require a footprint of approximately 200 m x 200 m including a carpark.

A preferred accommodation camp and alternative accommodation camp has been identified, following assessment by the ECI and based on feedback from the local community and Lithgow City Council. The location of each of the accommodation camp is shown in Figure 3.1. The preferred camp is within the scoping phase project area, comprising land owned by EnergyAustralia, and the alternative camp is located outside of the scoping phase project area, on private land. It is intended that both the preferred accommodation camp (Lakeside camp) and the alternative accommodation camp (town camp) will be assessed in the EIS. However, only one of the camp locations will proceed determined by the outcome of EIS consultation and detailed design.

3.2.1 Preferred accommodation camp – Lakeside camp

EnergyAustralia undertook an optioneering process that included multi-criteria analysis of identified options, informed by discussion with Lithgow City Council and other key stakeholders. From the multicriteria analysis, EnergyAustralia shortlisted two options for a temporary worker accommodation facility, comprising a location off Pipers Flat Road to the north of the project between Wallerawang and Portland and the proposed location to the south of the project off Magpie Hollow Road.

An environmental constraints and opportunities assessment was undertaken for the two shortlisted options and comprised assessment (including field inspections) by EMM ecologist and archaeologists and four Registered Aboriginal Parties. Based on the findings of the environmental constraints and the multicriteria analysis, the proposed location was identified as the preferred location and referred to as the 'Lakeside camp'.

Broad scale vegetation mapping of the Lakeside camp indicated that most of the site is covered in grassland that is dominated by exotic species. Some areas of moderate and high value remnant native vegetation were identified, with the majority of these excluded from the proposed disturbance footprint. A small portion of the Lakeside camp (in the north-east of the study area) is located on the edge of a ridge flat. This landform was found to have archaeological potential during the field survey and therefore further investigation of this area through test excavation was undertaken with low artefact density identified in one of the test pits. This has been assessed as part of the Aboriginal Cultural Heritage Assessment for the project.

Buses will be provided to transport workers to and from the project area. Barges and other watercraft may also be launched from the accommodation camp location.

An artist's impression of the preferred Lakeside camp is shown in Plate 3.1.



Plate 3.1 Artist's impression of the preferred Lakeside camp

3.2.2 Alternative accommodation camp – Town camp

An alternative site off Silcock Street in Lithgow (the former Pottery Estate) was identified following consultation with landowners and in response to feedback from local community and businesses who suggested an accommodation camp in Lithgow would provide improved, direct socio-economic benefits. The alternative site is referred to as the 'town camp'. Buses will be provided to transport workers to and from the project area.

An artist's impression of the alternative town camp is shown in Plate 3.2.



Plate 3.2 **Artist's impression of the alternative Town camp**

3.3 Road upgrades

The Scoping Report identified that the project site 'will be accessed from the south, via Sir Thomas Mitchell Drive and Magpie Hollow Road from Great Western Highway...' and that 'Sir Thomas Mitchell Drive will need to be upgraded to carry construction traffic; however, the extent of upgrade will be informed by further design...'.

Whilst the proposed road upgrades are considered consistent with the project as described in the scoping report, the scoping phase Project Area does not include Sir Thomas Mitchell Drive or Magpie Hollow Road (which will now require widening works). For completeness, the extent of potential disturbance for roadwork upgrades to Sir Thomas Mitchell Drive and Magpie Hollow Road is proposed to be included as shown in Figure 3.1.

3.4 Project areas

The project is based on a preliminary design and therefore it is anticipated that ongoing refinements will occur as part of the detailed design. The preliminary design demonstrates project feasibility and provides sufficient detail to inform the preparation of the EIS and seek approval. It is anticipated any optimisation or refinement of the design could occur within the design parameters and construction envelope provided by the preliminary design and assessed in the EIS.

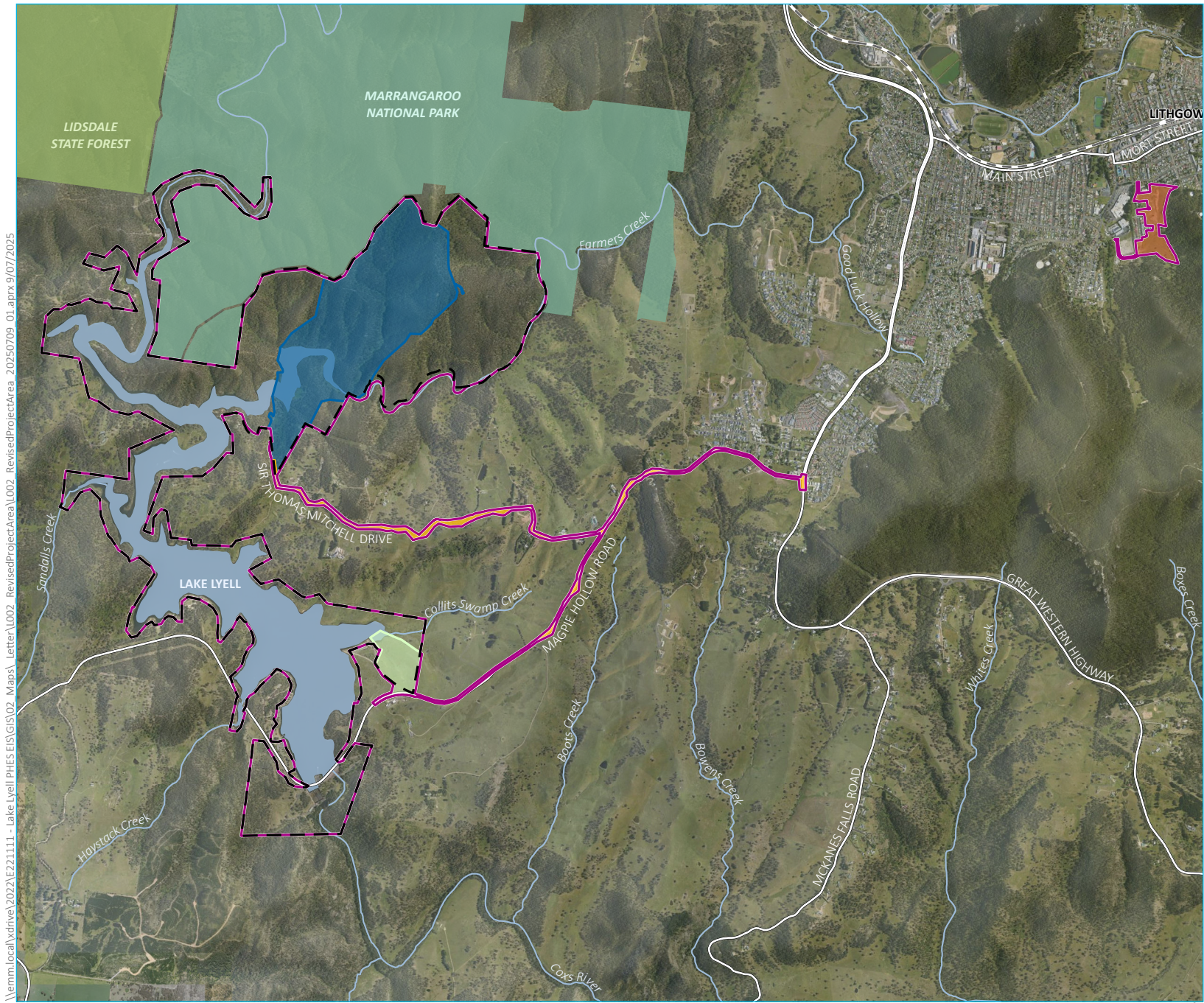
To accommodate future optimisation and refinement to the design as it progresses, a ‘construction envelope’ and ‘disturbance footprint’ approach have been defined for the project (see Table 2.1). There has been an increase in the Project Area to accommodate the changes outlined above. However, a comparison of the construction envelope and disturbance footprint areas between scoping and EIS phases shows that, even with the addition of the accommodation camp and road upgrades, there is a significant reduction in proposed impact areas for the project. The revised Project Area and Construction Envelope (labelled as the ‘Preferred accommodation camp’, ‘Alternative accommodation camp’, ‘Main works area’ and ‘External road upgrades’) are shown on Figure 3.1.

Table 3.1 Project areas

Term	Definition / Description	Scoping Report	EIS
Project area	The project area is a broader buffer around the project and represents the area that was investigated during the environmental assessments. The project area is largely confined to land owned by EnergyAustralia except for the primary access route on Council owned land. The project area includes both the land that will be physically disturbed for the project (directly and indirectly) as well as land where no disturbance or impact will occur.	760 ha	799 ha
Construction envelope	The construction envelope represents the maximum extent of where disturbance may occur during the construction of the project. To derive the construction envelope, buffers have been applied around project infrastructure and work areas to provide a level of flexibility where required. Some areas have reduced buffers to indicate reduced flexibility due to environmental or design constraints to be avoided.	317 ha	197 ha
Disturbance footprint	The disturbance footprint represents the physical disturbance that can be expected as part of the construction works. As the design is refined, the final siting of the disturbance footprint can move within the construction envelope, subject to the recommended environmental management measures, and provided it does not exceed any limits defined by the construction envelope or vegetation clearing thresholds.	167 ha	Considering each accommodation option ¹ : <ul style="list-style-type: none"> • approximately 137 ha for the project with a lakeside camp (of 14.9 ha), or • approximately 132 ha for the project with a town camp (of 12.4 ha)

Pre-construction and enabling work activities will form part of an early works package and are a subset of the total disturbance needed to construct the project. The early works package is anticipated to include access improvements, establishment of worker accommodation, and preparation of work sites. These activities occur before the main construction work and are critical to the overall construction timeframe. Any pre-construction enabling work would be managed in accordance with an enabling works management plan, which will be submitted to DPHI for approval as part of the project’s approval conditions.

¹ Noting that two options will be presented for a temporary accommodation camp and ultimately only one will be selected and built, the disturbance footprint considering each option is provided.



- KEY**
- Revised project area
 - Scoping phase project area
 - Construction envelope
 - Main works area
 - External road upgrades
 - Preferred accommodation camp
 - Alternative accommodation camp
 - Existing environment
 - Rail line
 - Major road
 - Named watercourse
 - Named waterbody
 - NPWS reserve
 - State forest

Project area overview

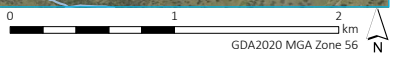
Lake Lyell PHES

Figure 3.1



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Source: EMM (2025); Lake Lyell Project Pty Ltd (2025); DCSSS (2024); GA (2009); MetroMap (2025)



4 Assessment requirements

Identification of the location of the temporary worker accommodation facility (including an alternative location) and changes to the project as outlined in Section 3 have considered constraints and issues informed by field survey and assessment undertaken to date as part of preparation of the EIS. Potential impacts associated with the project operation, temporary worker accommodation facility and road upgrades will be considered within the EIS and relevant technical assessments. A review of the SEARs has been undertaken against the proposed project description refinements and it is considered that no changes to the assessment requirements is necessary. An administrative change in the applicant for the project is required to align with the new proponent details provided in Section 2.

Please do not hesitate to contact me if you'd like to discuss this further.

Yours sincerely



Christopher Holloway

Director - Major Projects & Approvals

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