

**SUBMISSION** Lake Lyell Pumped Hydro Energy Storage Project – Objection  
**SUBMITTED BY** James Smallson. Natural Resources 19/04/26

## PURPOSE

To lodge an objection submission to the NSW Department of Planning, Housing and Infrastructure regarding the Lake Lyell Pumped Hydro Energy Storage Project. This submission raises concerns about significant, long-lasting impacts to biodiversity, hydrology and water quality, landscape/heritage values, Aboriginal cultural heritage, and the local economy. The submission also notes potential relevance to the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), including listed threatened species, ecological communities and matters of national environmental significance. (EPBC Act reference for citation: Environment Protection and Biodiversity Conservation Act 1999 – <https://www.legislation.gov.au/C2004A00485>)

## REQUESTED OUTCOME

{recommendation-start-do-not-remove}

- (a) That the Department not approve the Lake Lyell Pumped Hydro Energy Storage Project in its current form due to **the** significant and irreversible impacts to biodiversity, hydrology, water quality, cultural heritage, landscape values and the local economy.

{recommendation-end-do-not-remove}

## BACKGROUND AND SUMMARY

This submission objects to the Lake Lyell Pumped Hydro Energy Storage Project on the basis that the proposal **will** cause significant, long-lasting impacts to native vegetation (including threatened ecological communities), threatened species habitat (including Koala habitat and Bathurst Copper Butterfly habitat), hydrology and groundwater-dependent ecosystems, water quality in the Coxs River catchment, landscape and heritage values (including Mount Walker), Aboriginal cultural heritage, and the local tourism economy associated with recreational use of Lake Lyell.

## KEY ISSUES AND GROUNDS OF OBJECTION

### 1. Clearing of native vegetation (including threatened ecological communities)

The project would require clearing of approximately 100 hectares of native vegetation. As the vegetation forms part of, supports, or is adjacent to

threatened ecological communities, clearing will fragment habitat, reduce ecological function, and undermine resilience to drought, fire and weed invasion. Reliance on offsets is not an adequate substitute where impacts are irreversible or where like-for-like offsets are not feasible. In this case finding offsets of alpine communities that are core koala habitat is not possible.

**2. Significant impact on Koala habitat and Bathurst Copper Butterfly habitat** The proposal will clear and/or degrade habitat used by Koalas and the Bathurst Copper Butterfly. For Koalas, habitat loss, fragmentation and edge effects can reduce carrying capacity and increase stressors (vehicle strike, dog attack, heat stress) by forcing movement through disturbed landscapes. For the Bathurst Copper Butterfly, impacts to host plants and the specific ecological conditions required for breeding and persistence will be highly sensitive to clearing, changes to microclimate and weeds. The Department should require an avoidance-first design response.

### **3. Groundwater / water table impacts, vegetation change and weed introduction into Marrangaroo National Park**

Pumped hydro projects will alter groundwater regimes through excavation, tunnelling, dewatering, seepage pathways and changes to storage/pressure conditions. A changed water table will lead to decline of groundwater-dependent vegetation communities, dieback, and shifts in species composition. Disturbance corridors and changed moisture/light regimes also elevate the risk of weed establishment and spread, including into nearby conservation areas such as Marrangaroo National Park. So, it is not just the immediate clearing impacts on the native vegetation, due to the ongoing dieback, it will be significant and long lasting and cover all the catchment area below the proposed upper dam.

### **4. Water quality: toxic sediment and turbidity risks for the Coxs River**

Construction and operation activities (earthworks, spoil emplacement, access tracks, tunnelling and potential acid/metal mobilisation depending on geology) will increase turbidity and introduce contaminated sediments to receiving waters. Elevated turbidity will smother aquatic habitat and reduce light penetration; contaminated sediments can pose chronic risks to aquatic biota and downstream users.

### **5. Economic impact on local tourism and recreation at Lake Lyell**

Lake Lyell is used for recreation and is a drawcard for local visitors. Construction impacts (noise, dust, heavy vehicle movements, access restrictions, water level changes) and long-term operational changes (altered shorelines, infrastructure footprint, industrialisation of the setting)

will reduce amenity and the attractiveness of the area for tourism and local businesses.

## **6. Visual impacts on historic Mount Walker**

The project's built elements (new access roads, transmission and switching infrastructure, ventilation structures, portals, stockpiles and altered landforms) will introduce prominent visual intrusion in views to and from Mount Walker and surrounding lookouts. This can diminish the appreciation of historic and landscape character, particularly where industrial elements are visible on ridgelines or in otherwise natural settings.

Mount Walker has colonial-era heritage significance as part of the early nineteenth-century westward expansion beyond the Blue Mountains, including early land grants and pastoral activity that established European settlement patterns in the district. Its historic character and prominent ridgeline position contribute to the legibility of this cultural landscape, where landforms, views and place-names help communicate the history of exploration, early road/rail-era development and subsequent rural and industrial land use in the Lithgow region.

## **7. Impact on a known Aboriginal site**

The project area includes a known Aboriginal site. Any harm to Aboriginal objects or places is unacceptable and may be unlawful. Beyond physical disturbance, indirect impacts (restricted access, altered setting, vibration, erosion and visitor pressure) can also damage heritage values. The Department should require that Aboriginal cultural heritage assessment be led by the relevant Aboriginal knowledge holders, include field survey and cultural mapping at a standard agreed with the community, and commit to avoidance as the primary measure (no-go buffers and design changes).

## **8. Long-lasting, significant and permanent ecological change to Mount**

### **Walker**

The combined footprint of clearing, excavation, altered landforms, changed hydrology, edge effects and weed invasion risk means impacts **will** be long lasting and significant, with a high risk of permanent change to the ecology of Mount Walker. In this context, rehabilitation claims should be treated cautiously: re-establishing mature ecosystems, soil profiles and ecological function can take decades to centuries and may never fully recover. The Department should apply the precautionary principle, and refuse the proposal as avoidance of significant impacts cannot be demonstrated.

## **CLOSING**

For the reasons set out above, I request that the Department refuse the Lake Lyell Pumped Hydro Energy Storage Project. The impacts are significant and

irversible and include: impacts to threatened ecological communities, Koala habitat, Bathurst Copper Butterfly habitat, groundwater-dependent ecosystems and the Cocks River. There is no protection shown for Mount Walker's landscape and Aboriginal cultural heritage values.