

Objection to proposed Shoalhaven Hydro Expansion Project

Thank you for the opportunity to make a submission.

Executive Summary

We have grave concerns about the destruction of our ability to peacefully enjoy our home and property adjacent to the proposed project site. The EIS does not adequately address these adverse impacts. The impact on the wider community of Kangaroo Valley will also be significant and damaging. Again, the EIS fails to adequately address this. We found the EIS failed to meet the standard required by SEARs¹ and it is lacking evidence, current data and facts, as well as being biased in its conclusions. It is certainly not an objective assessment of the potential impacts of the project.

The proponent is pursuing this project primarily for profit and could pursue alternative and more viable projects to assist the transition of electricity generation to scalable renewable sources. We are strong supporters of the need to de-carbonise the Australian economy: we have solar PV installed, we have an electric vehicle, and we are committed recyclers and conservationists. Just because this project is 'green', doesn't make it a sensible or viable project to pursue.

The proponent is also involved in formal takeover negotiations that are highly likely to proceed and result in the proponent and therefore this proposed project being owned by foreign investors. Questions about the environmental credentials of the acquirer, Brookfield Asset Management, should also be considered.

A little about us

We live within 2 kilometres of the existing Kangaroo Valley Pumping and Power Station. We purchased our bush block over 25 years ago and have worked hard and saved to gradually improve the soil quality, biodiversity and peaceful setting of our 62 hectares.

Our three children have all helped along the way as they grew from toddlers into adults. At first, we camped in tents, then built a shed with modest accommodation/shelter. We finally were able to build a house in 2014. We now spend most of our time here in the Valley since I retired last December from my role as CEO of Cancer Council NSW.

It has been our dream to live in the Valley and pursue small-scale primary production. We have invested in soil preparation and improvement, dams and other water infrastructure, fencing and sheds, planted hundreds and hundreds of trees, commenced beekeeping, and have plans for several horticultural and agricultural projects.

The impact on me, my wife and our wider family will be very significant if this project proceeds: our dreams will be shattered.

¹ The Planning Secretary's Environmental Assessment Requirements

Inadequate assessment of impacts in the EIS

The US headquartered, global environmental consulting firm, Jacobs, have failed to complete an evidence-based, objective and complying assessment of the risks and impacts associated with the project. Their EIS lacks current (up to date) information at almost every level and area considered:

- The maps are not current,
- the data used for soil, traffic, noise, water, and others are all out of date
 - rainfall and temperate trend data is from 2014!

The discussion of mitigation across the various areas is wholly inadequate and, in most cases, merely suggests more communication with stakeholders, or further detailed work needed, or bland language used to lull the reader into thinking all will be ok. This does not meet the standard of assessment required by SEARs, nor does it provide a stakeholder with factually correct and well-reasoned understanding of the issues and impacts.

Some examples include:

- **Surface Water and Ground Water** – notwithstanding that the project is within the Sydney Drinking Water catchment, and without explaining the quantum and complexity of the risks involved, the EIS makes the questionable conclusion that, “the project is expected to have a neutral effect on water quality”, and “No significant cumulative impacts with respect to groundwater are identified for the project”. THIS IS INADEQUATE AND MISLEADING.
- **Traffic and Transport** – here again the language used is intended to reassure that impacts are either negligible or simple to manage. This shows how inadequate the assessments of risks and impact truly are. If we use the assumptions contained in the EIS just for vehicle movements, there are 40,000 truck movements, 13,700 bus movements and 41,000 light vehicle movements over the projected life of the project. The EIS then assumes this to be up to 100 heavy vehicle movements each day, plus up to 60 spoil truck movements, plus 16 bus movements and additionally 20 light vehicle movement (likely an underestimation), and this is every day: 7 days a week. Yet the EIS states in its conclusion that, “...construction and operation of the project is expected to have a negligible impact on performance of key intersections...”. It further states that “The potential impacts to public transport, pedestrians and cyclists, road safety and parking ... are also expected to be manageable. We regularly ride our bicycles into the village along Jacks Corner Road. I don’t think the impact and risks will be negligible! THIS IS MISLEADING.
- **Noise and Vibration** – this whole section is full of jargon and under estimation of impact. The amount of blasting, drilling, tunnelling, lining, excavation, heavy vehicle movement and combined construction is both significant and complex. It is also 24 hours a day, 7 days a week, and for a period of five years minimum. The EIS tries to explain this away, either by suggesting that further planning will be required or simply that it is expected that impacts will be within “Project operational noise limits”. TOTALLY UNREALISTIC.
- **Air quality** – Again, the EIS has used modelling and provides no evidence to back up their conclusion that “Construction dust emissions are not expected to cause adverse air quality impacts”. How could they make this conclusion? There will be very large amounts of particulate matter forced into the atmosphere from the range of extensive disturbance during construction. Kangaroo Valley, and along Jacks Corner Road and Bendeela Road are impacted regularly by prevailing strong winds from either the west or the east. Particulate matter will be pushed kilometres in both directions and will cause a wide range of risks. Respiratory issues

and pollution of drinking water are major concerns. All dwellings surrounding the project site use tank water that is captured from rooftops, with the real risk of water contamination.

- **Social and economic impacts** – This is where the EIS is wholly inadequate and has failed to make a realistic assessment of the risks and impacts on people living in the Valley and surrounding area. The cumulative impacts of this project will decimate the tourism and local business community in the Valley. As a tourist destination, why would anyone want to come to a dusty, noisy, traffic congested place? It is hard enough navigating the road(s) into valley currently. Both roads remain damaged from heavy rain and over-use by heavy vehicle traffic. Add to this all the projected trucks and heavy vehicles and then 24/7 noise, dust, and workers being transported in and out all week, what a disaster! Property values will drop; people's mental health and physical health will suffer; lives and livelihoods will be destroyed and take decades to recover if at all. Yet the EIS merely proposes, "ongoing communication with affected stakeholders and monitoring of potential impacts". TOTALLY INADEQUATE AND MISLEADING.

The proponent to become foreign owned

All current indications are that the board of Origin will recommend to shareholders that they accept the takeover bid from Brookfield Asset Management and EIG. This takeover will be subject to review by the Foreign Investment Review Board but would likely receive approval.

Thus, the proponent will become a foreign owned investor seeking to maximise returns as their primary objective: not the health and well-being of residents living near their proposed project.

I note that as recently as November 2021, a Brookfield entity, Brookfield Renewables Partners has been accused of 'greenwashing' its hydropower assets in the state of Maine, USA, according to an association of environmental groups.²

Conclusion

This project should not be approved or supported by either the NSW Government or the Commonwealth Government. Without government funding, this project would not be commercially viable. It is small in terms of generation capacity, it will cause significant socio-economic and environment damage during construction, and it is being pursued only to generate profit for what is very likely to be the pockets of foreign investors.

This project will have a detrimental impact on the mental and physical health of me and my family. We will suffer financial harm as a direct result of falling property value as well as the loss of peaceful enjoyment of our home. It will also have this impact on the wider Kangaroo Valley community.

No inclusion or evaluation of other more attractive options has been shared by the proponent or included in the EIS, which is required by SEARs.

² Natural Resources Council of Maine, Environmental Group Denounce Brookfield Renewable Partners for Engaging in "Greenwashing", November 15, 2021

The Kangaroo Valley community have been through a lot over recent years with fires, then heavy rains impacting life for us all. The last thing we need is the destruction of our peaceful valley by a proponent that has other options if they are truly committed to playing their role in Australia's clean energy transition.

Thank you for reading this submission and I sincerely hope the planning minister declines this proposed project.