

# Shoalhaven Hydro Expansion Project: SSI-10033

## Further Objections

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1. The additional exhibition period fails to cure the inadequate community and stakeholder engagement obligations of the proponent (as required by SEARS and by applicable law and regulations). No further engagement has been undertaken. In addition, apart from the pro forma letter that was issued to the community and residents, Origin has done nothing to make the community and residents aware of the opportunity to make submissions up to and including 10 February 2023. This is unsatisfactory and reinforces the inadequate manner in which Origin has conducted itself to date in connection with seeking genuine input from the community and stakeholders – rendering the EIS unsafe and unreliable.
2. A further example of the inappropriate level of positive engagement by Origin in connection with the project and the concerns of the community is its failure to meet with Shoalhaven City Council to provide the Council with a requested briefing until 22 February 2023 – being well past the date for closing of submissions. While Origin has said to Council it will consider any further submissions Council may have after this meeting this delay raises two further key concerns, namely:
  - a. the submission from Council will not be publicly available as the deadline will have past for submissions on the Planning Portal (and therefore this raises material concerns as to transparency and due process); and
  - b. the community will be robbed of the opportunity to hear from Council following the meeting in advance of the closing deadline for submissions which would have provided the community with the opportunity to further consider their own positions and their own concerns in order to respond to the EIS on a fully informed basis.
3. The proposed expansion will require significant truck, heavy vehicle and more than 450 – 550 oversize over mass (OSOM) vehicle movements 24 hours a day 7 days a week for more than 5 years. The roads leading into and out of Kangaroo Valley are narrow, winding, steep, full of potholes and in very poor condition overall. Kangaroo Valley is not a destination that is easy to access. Its access routes are difficult and precarious for normal sized vehicles, let alone large trucks and OSOMs. The road over Cambewarra Mountain continues to be limited to one way traffic due to the significant road repair work required to fix the road following the extensive damage and slippage arising from the recent flooding events. The roads leading into and out of Kangaroo Valley are not suitable or viable for significant heavy vehicle traffic over and above the current trucks and other large vehicles that currently traverse the Valley.
4. The additional volume of buses, 4wds, heavy trucks and OSOMs and their frequency will be staggering. The EIS provides information on this but it is terribly opaque and difficult to easily follow and digest. The EIS also uses different terminology, incomplete detail and also fails to provide other important detail (such as truck volumes and frequency where cement and concrete needs to be trucked into the project site). However even on the numbers provided the additional traffic will see approximately one bus, 4wd, truck or OSOM come and go through the Valley to the project site at least every minute during daylight hours for a significant period of the project with heavy vehicle movements occurring during the night at alarming frequency during certain periods of at least 4-8 two way trips. The detail on this latter aspect is misleadingly set out and difficult to follow – referencing 550 OSOM movements (so 1,100 comings and goings) out of work hours during the night but with no greater clarity.

5. Not only will the incredibly significant increase in volume of large vehicle, heavy truck and OSOM traffic movement and their frequency of movement damage the precarious road system cosmetically and structurally, it will give rise to dangerous traffic conditions for residents and visitors coming and going from Kangaroo Valley, material and consistent traffic congestion, road closures and cause increased damage and destruction to the natural wildlife (ie roadkill) given the 24 hours a day 7 days a week for 5+ years planned movements on the roads. The noise will also be incessant – with OSOMs expected to make their movements outside of work hours, during the night in many cases. Heavy vehicle noise, air brakes, the clatter of materials being loaded and unloaded 24 hours a day 7 days a week for 5+ years.
6. Serious consideration and expert assessment is also needed around the real risk of large vehicles and trucks having accidents coming down Barrengarry Mountain and Cambewarra Mountain. The nature of the roads and unfamiliarity of drivers with those roads, the size of the vehicles fully laden will invite material risk - risk that a code of conduct or “how to drive” plan will not and cannot mitigate. The proponent and its directors need to be held accountable for any such accidents, including the awful prospect of personal injury or death as they are obvious.
7. In the last few years, Kangaroo Valley has been ravaged by fire and floods, which have had a profoundly devastating effect on the residents of Kangaroo Valley, their property, their businesses, the natural flora and fauna and the road system (including the ability for people to come and go from Kangaroo Valley). In this context, the importance of the access routes to and from Kangaroo Valley cannot be underestimated. For health and safety reasons, people need to be able to get into and out of Kangaroo Valley. Doctors and other health care professionals, paramedics in ambulances need to be able to get into and out of Kangaroo Valley. The risk of damage to the precarious road system from damage to and closure of access roads from heavy vehicle movements is too great a risk to people living in, and visitors to, Kangaroo Valley. The profit of the proponent cannot be prioritised over the health and safety of people who live and visit Kangaroo Valley.
8. The failure of the EIS to adequately assess these impacts and issues is appalling. It draws on outdated data, omits to include other data about increased traffic volumes required for the project and concludes glibly that the issues will be minimal, non-existent or can be managed. Relevantly and further undermining the accuracy of the EIS and its conclusions is that much of the traffic modelling is conceptual or based on extrapolations of inapplicable and inappropriate data. The proponent must exist in suspended reality to think that the requirements of the Project will not cause chaos and material detriment to the Valley 24 hours a day 7 days a week for 5+ years. To present a conclusion otherwise is disingenuous and unsafe. The absurdity of the EIS in this respect is addressed by many of the Agencies responses and in particular the response from Transport for NSW.
9. Issues relevant to Hampden Bridge:
  - a. Hampden Bridge is the only surviving suspension bridge from the colonial period in New South Wales; and is the oldest and only timber suspension bridge still carrying vehicular traffic still in operation within Australia. It was listed on the New South Wales State Heritage Register on 2 August 2019 and is the only access point to Kangaroo Valley town from the northern parts of Kangaroo Valley, including Barrengarry, Bendeela Road and Upper Kangaroo River Road.

- b. Hampden Bridge is a tourist attraction and has been a landmark icon of the region for more than 100 years. The bridge is a single lane bridge for vehicular traffic, with two narrow pedestrian walkways; with a maximum truck load of 42.5 tonnes (46.8 short tons; 41.8 long tons), and no more than one truck on the bridge at a time.
  - c. Hampden Bridge, by its very age, design, structure and historic significance, is not built for heavy traffic movements. The risk of damage to the bridge from such movements (24 hours a day 7 days a week for 5+ years) is real and the consequences of that damage would be extreme, including loss of life, injuries and closure of the bridge for repairs (preventing residents from the northern parts of Kangaroo Valley and visitors to Kangaroo Valley from accessing the town and leaving only one access route for them in and out of Kangaroo Valley (via Barrengarry Pass)).
  - d. Hampden Bridge is not approved for any OSOMs. It also has limited height, width and load requirements which means that many heavy vehicles and their contents will not be able to travel across the bridge. This means that all OSOMs and most heavy vehicles will not be able to access the project site except via Barrengarry Pass (not via Cambewarra Mountain or Kangaroo Valley Road), which will place even greater stress and strain on that access route together with all of the other negative consequences referred to above. For a bridge of such historic significance and importance to the town, Hampden Bridge should not be permitted for use by large scale heavy vehicles 24 hours a day 7 days a week for 5+ years. The bridge was not built for, and is not fit for, such purposes.
10. Kangaroo Valley is a peaceful, tranquil rural town. It has a population of under 1,000 people. Due to its natural beauty, charm, character, abundant wildlife and tranquility it is a popular tourist destination. The village, itself, is small but essential to Kangaroo Valley residents and visitors and can only be accessed via one road, Moss Vale Road. To the north of the village is Barrengarry Mountain (discussed above), Bendeela Road, Upper Kangaroo River Road and historic Hampden Bridge (that connects northern Kangaroo Valley to the village). To the south of the village is Kangaroo Valley Road and Cambewarra Mountain (discussed above). All of the shops, cafes, bakery, restaurants, pub, general store, IGA and service station and other important community service facilities including the post office, police station, ambulance station, local public school, hardware store, garden nursery, town hall, churches, tennis and basketball courts, showgrounds, community garden and caravan park are located in the village. The village is, therefore, the heart of Kangaroo Valley – a central hub and meeting place for locals and visitors and also a necessity to enable residents and visitors to access basics, essentials and community services without travelling north over Barrengarry Mountain to Bowral or Mittagong or south over Cambewarra Mountain or Kangaroo Valley Road to Bomaderry, Nowra or Berry. Many full-time and part-time residents run businesses that rely upon these important amenities in the village - including short term rental accommodation, recreational services such as bike and kayak hire, wedding and event venues, catering services, shops, cafes, restaurants and the pub. Under the proposed expansion and the 24 hours a day 7 days a week for 5+ years of movements of heavy vehicles and trucks, this one road town will be severely and negatively impacted. No longer will it be a small, quiet, tranquil oasis but a thoroughfare for large noisy, polluting trucks and vehicles causing danger to people trying to cross Moss Vale Road, particularly children who attend the local school in the village, as well as elderly residents (of which there are many) and visitors. People will no longer be able sit outside at the local cafes, pub and bakery and enjoy a meal or drink in a country town setting, but will be exposed to the loud, unrelenting noise and pollution of trucks and other heavy vehicles.

Having just endured COVID lockdowns, fire and floods (causing severe damage to access roads to Kangaroo Valley), the residents of Kangaroo Valley cannot be expected to tolerate 5+ years 24 hours a day 7 days a week of further disruption to their lives and livelihoods, which will occur if the proponent is permitted to expand the hydro project. The noise, pollution, traffic, congestion, road damage, road kill and road closures arising from heavy vehicles coming in and out of Kangaroo Valley 24 hours a day 7 days a week for 5+ years will ruin the amenity of Kangaroo Valley. It will no longer be a peaceful, tranquil town but a noisy, dirty, congested construction site. Tourists will stop coming to Kangaroo Valley and residents' safety, lives, livelihoods and businesses will be destroyed. The profits of the proponent should not be prioritised over the lives, safety, livelihoods and businesses of Kangaroo Valley residents.