

Re Project Application Number SSI-10033

For the attention of Iwan Davies
Planning and Assessment
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2124

I am one of the close neighbours to the proposed expansion of the existing Origin's Shoalhaven's Hydro power plant (**proposed hydro project**) and I appreciate the opportunity to make this submission.

I have previously submitted a response to the first exhibition of the EIS and as the second exhibition of the EIS has not been updated or improved I still object to the project for the following reasons

1. The inadequate community engagement and consultation regarding the Project.
2. The EIS appears incomplete with outdated and misleading content, data, assessments and reference points which leads to bias in the proposal.
3. The EIS states that the project will work for 24 hours a day 7 days a week for at least 5 years with unacceptable levels of noise, air pollution, blasting and vibrations
4. The EIS identifies that there will be damage and destruction to natural habitat and wildlife via the dumping of an estimated 420,000 cubic metres of (acid-leaching) spoil. This impact has been identified to include the loss of native fauna and flora. Mitigation of the identified impact of this dumping appears inadequate in the EIS and an unacceptable risk to the environment of this area.
5. The EIS has identified there will be a large-scale movement of heavy vehicles, trucks and oversize vehicles during the life of the Project into and out of Kangaroo Valley. This will have a major impact on safe access for residents / visitors and again the EIS has not really addressed how this will be effectively managed to minimise the impact. The heavy rains last year badly affected the roads resulting in the access roads into and out of the valley being closed and taking many months to repair – large scale truck movements are likely to cause additional damage and again it is not clear in the EIS as to who has responsibility for expedient repairs.
6. Kangaroo Valley is a unique environment and the project will significantly impact on this environment and the local community. It is likely that once visitors are aware of the disruption caused they will likely avoid visiting the valley which will impact on local businesses (which are still recovering from fires, floods and covid lockdowns) and the broader community in general.

7. As the project is hydro there is an impression that the outcome will be positive for the environment. However, again the EIS has not been clear on
 - a. Total greenhouse gas impact from construction through to operation. There is significant greenhouse gas generation during construction and during operation as there is a requirement to pump water back up the mountain to Fitzroy falls to maintain the system. There needs to be greater transparency of the total greenhouse gas model for this project to better understand its benefit to the environment.
 - b. What the economic case is for this project. As this project is expecting taxpayer funding support (to the commercial benefit of Origin) there needs to be transparency on the financial case for this project – both for shareholders and taxpayers.
 - c. Alternative options available for Origin. The EIS does provide options on various upgrade alternatives for their Kangaroo valley hydro operation but does not provide options of other 'green projects it has explored or considering. This should have been made available as part of the EIS.
8. The EIS itself is largely conceptual and a very complex document which consists of hundreds of pages of technical detail. There are many statements within the EIS (and the attached numerous appendices) which highlight that additional investigations are required during detailed design to better understand impacts and how best to mitigate. As these are not available in the EIS it is difficult to understand both the impact and planned mitigation steps where they are yet to be developed. In addition, it is not clear whether the mitigations provided will be against 'worse' case scenarios or simply a mid-range risk.
9. These type of projects for many reasons will extend beyond the anticipated timeline which will result in the project team needing to increase the work time beyond what has been identified as 'standard construction hours'. There needs to be transparency in the EIS that expanding work hours beyond standard should be the last resort for Origin and not the first due to the ease of sending an email!
10. There are numerous alternative construction methods which could minimise disruption impact on the local community but could cost more to implement / adopt. For example
 - a. Tunnelling with machines verses blasting
 - b. Use of electric vehicles for transport of spoilage

These alternatives which would reduce impact on the local communities should be explored and have been provided within the EIS. These alternatives should not be left to a financial decision made by Origin at some later stage.

In Summary, as a property owner in the main impact area of the project, there are still too many 'unknowns' for me to be able to support the project.

Thank you for taking time to read my submission and I look forward to your response.