

**Thank you for the opportunity to make a submission to the
Oven Mountain Pumped Hydro Energy Storage Project (OMPH).**

Voice for Walcha is a community-based group that originated due to concerns around overdevelopment of the Walcha Plateau and irresponsible renewable energy projects within the New England REZ. We believe renewable projects should be designed to suit the location – they should be appropriately sized and located to reduce impacts on the environment and communities. Appropriate renewable projects should gain community support for these reasons.

We object to OMPH because of its poor location within several hundred metres of the World Heritage Gondwana Rainforests of Australia and declared wilderness areas. OMPH is located adjacent to the Oxley Wild Rivers National Park which forms part of the World Heritage listed Gondwana Rainforests of Australia. It is not appropriate to develop industrial projects in areas that may impact national parks. This is particularly significant with OMPH with extremely close proximity to the world heritage and declared wilderness areas.

Any proposed industrial project, including renewable energy projects, located in sensitive, high value biodiversity areas are inappropriate. The areas adjacent to the Gondwana Rainforests of Australia need to be preserved, not destroyed.

For the following reasons, we believe any project located within 20km of National Parks in NSW are inappropriate.

1. Industrial developments adjacent to National Parks risk causing irreversible damage to the Parks due to contamination, erosion and run-off, invasion with foreign species and predators, fragmentation, and edge effect – all serious risk factors to National Parks.
2. The areas of connectivity leading back into the National Park (biodiversity corridors) are extremely sensitive, valuable, and irreplaceable. They are an extension of the National Park, and the values of these areas are often as significant as the values of the National Park itself. They cannot be replaced “like for like”. The use of the Biodiversity Offset Scheme is not appropriate in these areas where the value of the biodiversity is not repeatable.
3. Areas adjacent to National Parks provide refuge during bushfires and are particularly important as areas for regeneration of the National Parks after fires for both flora and fauna. They are also often strategic areas for fighting bushfires within the National Park.
4. Many of these areas are worthy of protection and addition to the World Heritage Area. Industrial projects in these areas precludes the future addition of them to the Gondwana Rainforests of Australia.
5. National Parks and Wildlife Service should not be using resources to assess the impact of every project proposed for its boundaries. It should be a “no-go zone”.

World Heritage Properties in Australia are protected and managed under the EPBC Act and as stated in the Unesco World Heritage Conference Website regarding the Gondwana Rainforests of Australia - *“Importantly, this Act also aims to protect matters of national environmental significance, such as World Heritage properties, from impacts even if they originate outside the property or if the values of the property are mobile (as in fauna). It thus forms an additional layer of protection designed to protect values of World Heritage properties from external impacts.”*

This clearly highlights that it is the responsibility of the government to protect this World Heritage Property from all threats, including those arising outside its boundary. It is the responsibility of the government to protect the area from the following impacts identified and quoted from OMPH EIS:-

- *“Edge effect on vegetation is unknown and unpredictable.”*
- *“The impacts to the aquatic ecosystem cannot be accurately quantified.”*
- *“Bushfires are unknown and unpredictable.”*
- *“construction of the Project has the potential to disperse weeds species into areas where they do not currently occur. Immediately adjacent to the areas of direct impact, native vegetation may be affected by changes to microclimatic conditions such as sunlight levels, average windspeed and soil moisture availability. Construction activities may also result in temporarily increased dust levels, covering adjacent vegetation and inhibiting growth. These changes may result in minor degradation of native vegetation through weed invasion, changes to native plant species composition and diversity and habitat suitability for animal species.”*
- *“In addition to permanent edge-effects, there may be temporary impacts from noise, vibration and artificial lighting during the construction period which can lead to animals temporarily or permanently leaving the area, hearing impairment, disruption to daily patterns and impairment of normal behaviours (breeding, feeding, territorial defence etc).”*
- *“Removal of native vegetation and associated habitat and inundation of land has the potential to result in fragmentation of fauna habitat, with resultant effects on fauna species movement, reproduction and gene flow.”*
- *“All current access tracks in the disturbance footprint will be upgraded with new roads created with a corresponding increase in traffic. Unmitigated, this has the potential to result in increased mortality of animals due to vehicle strike in these areas.”*
- *“The Project includes a new approximately 15 km long, 132 and 330 kV overhead powerline. Overhead powerlines will be hazardous for medium to large species of birds, flying-foxes and arboreal mammals through collision and potential electrocution.”*
- *“Increased human activity and creation of new roads also has the potential to attract feral animals if unmitigated. Of key concern is a potential increase in feral Cat (*Felis catus*) and Red Fox (*Vulpes vulpes*) activity and consequent impacts on native animals, including Brush-tailed Rock-wallaby.”*
- *“Construction activities have the potential to result in impacts to water quality in watercourses located downstream of construction area in the following ways:*
 - *release of poor-quality water to watercourses*
 - *reduction in watercourse bank stability following any nearby construction and any clearing of riparian vegetation could also result in bank erosion and input of sediments into watercourses*
 - *accidental release of chemicals and fuels (e.g. oils, hydraulic fluids and fuel from construction equipment)*
 - *disturbance of riparian vegetation could have indirect impacts on aquatic habitat quality and influence abundance, distribution and health of aquatic biota.”*
- *“One species, the Brush-tailed Rock-wallaby, is likely to be significantly impacted with the loss of critical habitat known to support this species likely to result from the Project.”*

The decision to have the boundary of the New England REZ follow the National Park boundary is an example of poor planning by EnergyCo. The NE REZ should allow for a buffer between the REZ and National Parks. National Parks resources should not need to be wasted on assessing every renewable project on its boundary.

The following quote is from the submission to the Winterbourne Wind Project by Dr Stephen Debus BA(Biol./Behav.Sc), Dip. Natural Resources (Wildlife), Dip. Ed (Sc), MSc (Zool.), PhD (Zool.). It highlights the impact of projects in close proximity to the Oxley Wild Rivers National Park. *“The Winterbourne windfarm footprint is close enough to Oxley Wild Rivers National Park to suggest the risk of compromising the Park’s primary purpose, ie. its conservation values, because of the impact of clearing, habitat fragmentation and more ‘hard’ edge on and near the Park’s western boundary, and the risk of increased mortality of protected and threatened fauna using the Park and adjoining lands.”* We have included the full submission as an attachment.

Risks associated with industrial projects adjacent to National Parks are unavoidable and as such, these projects should be prohibited. As with the Winterbourne Wind Project, we call for a 20km buffer to be declared around our National Parks to protect this sensitive, irreplaceable biodiversity and to protect the status of our World Heritage and wilderness areas.

We also question the need to build pumped hydro developments in sensitive biodiversity regions given the technical evidence suggesting large scale electric batteries are becoming more efficient than pumped hydro schemes. If there are alternatives to the destruction of our sensitive environmentally significant areas, these should be considered before pumped hydro schemes like OMPH.

We hope you consider these points and the value of the ecosystems of our National Parks.

Voice for Walcha