

The Honourable Paul Scully MP, Minister for Planning
C/- Anthony Ko, Project Contact Planner,
Department of Planning and Environment
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Parramatta, NSW, 2124.

Submitted by email to: Anthony.Ko@planning.nsw.gov.au

Dear Minister

Re: Submission of Objection to the Proposed Oven Mountain Pumped Hydro Storage Proposal:

Application Number SSI-12422997, **EPBC ID Number** 2020/8850. **Assessment Type:** Critical State Significant Infrastructure. **Exhibited as:** (EXH-62250958)

We write as concerned citizens who frequent the valley of the lower Macleay River and who have family in the region who use the river and depend on its catchment for a clean and safe water supply. We are also tax-payers who are seeing the commitment of significant resources when better, cheaper, less damaging alternatives exist right now.

We have followed the evolution of the proposal, and after studying the Development Application, EIS and related documents, we ask that the project proposal be rejected for the following reasons:

1. There is not satisfactory mitigation that that would prevent the construction and operation of such a system from negatively impacting the lower Macleay, its plant and animal communities (and their biodiversity) as well human communities. In particular:
 - a) The proposal would involve a huge disturbance to the current natural environment, not just in the immediate term but in the far future. This will come from large scale construction of roads, pondages and infrastructure, with soil and rock disturbances likely to alter the physical stability of the adjacent river ecosystems and to damaging or destroy these natural assets.
 - b) The construction activities are likely to create waste and other pollutants that will eventually find their way into, and contaminate, the water catchment. Water samples reported in the past have shown antimony and arsenic are likely to be mobilised by disturbances caused by construction and ongoing activity.
 - c) The Macleay valley is considered a vital link in the wildlife corridor of the Great Dividing Range that many threatened and endemic species rely on. The project would cut into this corridor and weaken its critical role in the protection of biodiversity.
2. Such a large development is not only inappropriate for such a remote area but its difficult (and fragile) terrain means it will never be restored at the end of the project's life and that the natural features and amenity will be permanently affected. This is a long-term, hidden cost to future generations.
3. The business case for the project is narrowly conceived and does not appeared to have been thought through in terms of alternatives, especially given the designation of Critical State Significant Infrastructure. Solar and battery technology has been consistently shown to be far cheaper; peak gas generation will be cheaper to construct and may even have fewer emissions (Mountain & Percy, Victoria University, 2020). Both could be constructed closer to the areas of need and in less sensitive locations with fewer environmental impacts. Investment in old technology approaches do not make business sense when less money could be spent, more efficient technology employed and natural assets preserved.

Pumped hydro constructions of this type and scale are also typically vulnerable to cost over-runs (e.g. fuel and material cost rises alone, over the extended period required for construction and commissioning, could be dramatic). This is multiplied if there are delays, or if problems are encountered – not unlikely given the terrain of the Macleay.

Finally, there seems to be a lack of detail and precision about just how the project will cover its full transmission, maintenance and infrastructure costs.

On the basis of these objections we contend that it would be irresponsible for the project to proceed and we urge you to decline its approval.

Yours sincerely

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