

10 October 2023

TO Anthony Ko
Department of Planning
c/ Planning Portal

RE Exhibition of the Environmental Impact Statement for the Oven Mountain Pumped
Hydro Energy Storage Project

Dear Mr Ko and Department of Planning team,

On behalf of Community Power Agency, I thank you for the opportunity to make a submission on the Environmental Impact Statement for the proposed Oven Mountain Pumped Hydro Energy Storage Project (OMPHESP or 'the project').

Community Power Agency has been working over the past decade to improve practice of the renewables industry in a number of ways including authoring a number of State and industry guidelines and training, including:

- Clean Energy Council's Guide to Benefit Sharing in Large-scale Renewable Energy Projects
- Victorian Community Engagement and Benefit Sharing in Renewable Energy Development A Guide for Renewable Energy Developers
- Chairing the Social Evaluation Panel for ACT Government's Renewable Energy Auction
- Drafting the Tasmanian Guidelines for Community Engagement, Benefit Sharing and Local Procurement for large scale renewable energy development
- Designing and delivering the first professional development course on community engagement and benefit sharing. The Socially Responsible Renewable Energy Development short course was delivered with the Centre for Systems Innovation (Griffith University) and tailored to the renewable energy sector.

Community Power Agency is currently working to support local communities through the shift to clean energy, particularly in state-determined Renewable Energy Zones such as the New England REZ. We have practical, contemporary experience of engagement on the planning and management of transmission lines and associated infrastructure, as well as the research we have undertaken.

My role is engagement coordinator, and I carry out the work of CPA on the ground in the New England region. I am a resident of the Armidale Regional Council Local Government Area.

I play a facilitation role in the New England Biodiversity Reference Group, a group of local ecologists and conservationists who formed in March 2023 as a way to provide recommendations on the planning and management of transmission line planning and management to minimise local biodiversity impacts.

Response to proposed Oven Mountain Pumped Hydro Scheme

Context

The proposed project is a 900 MW Pumped Hydro Scheme. Pumped Hydro provides a renewable energy solution complementary to wind and solar. It essentially can be used as a battery or energy storage system, as water can be pumped to the top reservoir when there is an excess of energy, and then in times of peak demand or at night, for example, water can be released to the lower dam and drive a turbine, producing electricity on an as-needed basis. So the proposed project would be able to provide base load power, and quickly scale up to provide peak load, too.

Pumped Hydro is considered to be one of the most efficient types of energy storage system. While hydroelectric projects take a lot of money and resources to build, they are estimated to last approximately 100 years. Once constructed, the operating costs are generally low.

Australia must be pro-active with supporting the development of renewable energy if it is to meet its scheduled target to shift from highly polluting fossil fuel powered energy to renewable energy, and therefore lessening the potential impacts on climate change. Fossil fuel emissions is one of the leading contributors to global warming, which causes erratic weather patterns, and climactic events.

The extent of catastrophic bushfires and floods, both of which have been experienced in the project's vicinity in recent years are examples of the impacts of climate change.

In this context, it is difficult to argue for a 'do nothing' approach.

But nor should it be 'do nothing at any cost'. Community Power Agency advocates that projects such as Oven Mountain work diligently and collaboratively to raise the bar in terms of the elements that contribute to best, or better practice in regards to **social** and **environmental** aspects of the proposal.

This response will provide observations and requests for further details on aspects of these two important themes.

Social

Community engagement

The proponents have produced clear information about their proposed project and made this accessible to communities and stakeholders.

I acknowledge the EIS and its attachments is a lot of reading, and it is difficult to complete a submission in the 28 day timeframe. While there has been public complaint about the length of time that the project is on display (28 days), this is not a reflection on the proponent, but the legislation. It was helpful that the proponent drafted a summary of findings from the EIS

and uploaded to the project website. This was a positive strategy to make engagement with the EIS exhibition process less onerous for stakeholders. At times the Planning Portal

The proponent has also provided a presence at events that I am personally aware of such as The Armidale Show, Ebor Hall and a trade fair in Tamworth. I note from Appendix D, and Figure 5.1 (EIS p85) that numerous other community information sessions and stakeholder meetings have taken place to date.

If a community engagement manager or similar has been recruited to assist with this project, I strongly encourage the proponent to retain this person/people on a long term basis so that any community members or stakeholders can receive timely responses to any questions or concerns they may have. It would be detrimental to leave this task to project staff moving forward.

From the consultation log and consultation diagram, I cannot see any evidence of landholders being consulted about the route of possible upgrade of transmission lines connecting the project at Armidale substation. Nor is it reported in Table 5.4 Community Views (EIS p88).

My own enquiries, and those of affected landowners who have been in touch with me, have found it very difficult to find a representative at OMPHS, EnergyCo or Transgrid who is willing to speak about the options available for the transmission route connecting the project to line 965 given the current lack of detail on this part of the project. I am concerned that very little detail is provided about this part of the project in the EIS, just that:

The Project intends to transmit and receive power by connecting to an existing Transgrid transmission line that runs between Kempsey and Armidale, known as Line 965. The Project includes the establishment of a transmission connection to Line 965, including the construction of a substation and connection infrastructure, access roads and transmission lines rated up to 330 kV. An upgrade of the existing section of Line 965 from the Project to Armidale will be subject to a separate application under the EP&A Act

- ES.4

Request for more information: Details of possible transmission line upgrades or alternative routes being considered **should be provided by the proponent as part of this EIS and appropriate consultation held**, even if the approval itself will form part of a separate EIS process. I ask the Department of Planning to consider requesting this as additional information required for the current process.

Transparent consultation on options for transmission line placement would demonstrate the three reported pillars of the proponent's approach from engagement, which are: 'build trust...', 'build credibility...', 'build visibility...'. (EIS, p 77).

Community benefits

There is surprisingly little detail about the possible forms of community benefit sharing schemes for the project in the EIS. The Social Impact Assessment states:

OMPS proposes to enhance the livelihood benefits of the Project by entering into Voluntary Planning Agreements (VPAs), or similar, with Armidale Regional and Kempsey Shire Councils to provide a range of community benefits for the regional area. The VPAs are currently under negotiation and will be finalised in early 2023.(p158)

The website does not contain much more detail, but does include these paragraphs:
As part of ongoing work, the project is liaising with Armidale Regional and Kempsey Shire councils, local Aboriginal Land Councils, and community groups to develop a community benefit scheme. Community benefit schemes are funding agreements that are based on local needs, are co-designed with the community, and embody genuine collaboration. Benefit sharing initiatives look to establish productive long-term relationships between the project and the community and aim to foster vitality and success in the region. Benefit schemes can take many different forms and encompass a broad range of themes, such as environmental sustainability, health and wellbeing, sports and recreation, or skills, education, and training.

- https://www.ompshydro.com/community/?sk=community_benefits

Request for more information: Can the proponents please provide more information on the development of the community benefit schemes, including dollar per megawatt amount and potential governance models used to plan the distribution of the funds, particularly given the reference that VPAs were expected to be finalised in early 2023. It is in the community's interest to understand what benefits the project may bring to the region over the long-term.

Impacts on housing affordability

The proposal's social impact study acknowledges housing affordability is a concern in the region. It also acknowledges - which was really good to see - the cumulative impact of multiple other renewable energy projects that are likely to undergo construction simultaneously, which will have impacts that need to be well-planned for, including housing availability and affordability. While the proposed camp can help with the short term housing requirements for construction workers, the workforce housing and accommodation strategy ought to consider housing models that provide accommodation with longer term community benefits. Project managers and other staff will require housing for longer periods and prior to construction of the workers camps, so the proponents should meet with accommodation providers in the region such as community housing providers, Local Aboriginal Land Councils, educational institutions offering student accommodation, Councils and short-term accommodation providers to consider options that will both be beneficial for project staff and the local community.

Similarly, there is little evidence of how a worker's camp would provide economic benefits for local towns such as Lower Creek and Bellbrook.

Request for information: That the workforce housing and accommodation strategy consider housing models for its range of workers, not just construction workers, and that the strategy identifies opportunities for housing models that bring legacy benefits to the community.

Social impacts can be managed through benefits such as increased economic activities, legacy housing, community benefits and employment opportunities. But these need to be planned well in advance and in collaboration with stakeholders including organisations and companies already working on the ground.

The region has a high expectation that proponents will design their projects in a way that makes for good relationships. If approved, the project will be seeking to operate for 100 years, and its long term planning should include means by which it will contribute to regional development and the local economy.

Workforce capacity building

The Project has an opportunity to provide long term employment and training for the local and regional workforce. (EIS SIA ES.5).

Request for more information: With approximately 30% of the workforce to be hired locally (or regionally), it would be useful to see more detail on what strategies the proponent will use to build this workforce capacity in order to assist local organisations (training providers, employment agencies, social enterprises etc) to better understand their potential roles in this process.

Aboriginal heritage

Every effort should be made to avoid sites of significance. While it is noted that the large envelope will enable some flexibility to avoid sites, avoidance measures must be explicitly planned and not left to chance.

At the time of writing, the link to the Aboriginal cultural heritage assessment report (Appendix K) is broken, coming up with an error message that the document has been moved. As a result, there is no further comment on this part of the assessment at this time.

Biodiversity

While biodiversity is assessed on the project alone, it is important to note that the project site is in an area that has been damaged by floods, fire and drought in recent years, all of which have created severe impacts for wildlife. Additionally, the cumulative impact of vegetation loss across the different renewable energy projects, and of the building of new associated infrastructure, should be considered in this context.

It is worthwhile noting that the project will not require a dam the Macleay, it consists of off-stream reservoirs that have water diverted into it. Noting there are times of heavy water flows and scarce water flows, it would be useful to better understand the proponent's proposed water management techniques. Is there a way to design the project, for example, that it has a flood mitigation element?

Is it a requirement that streamflow of the Fingerboard Crossing Creek *“will unavoidably be impacted as a result of the Project. Average annual streamflow within the watercourse*

(between the upper and lower dams and reservoirs) is predicted to reduce by 100% (i.e. no flow will occur),” or could a small flow be maintained?

Given the extent of the clearing (300 approx ha incl. 7ha threatened communities) biodiversity offsets must be significant and local. According to the Summary of Findings, *“The Project requires 8,055 ecosystem credits to compensate for impacts on native Plant Community Types (PCTs) and ecosystem credit species. In addition to ecosystem credits, the Project also requires a total of 42,178 species credits. The Project’s biodiversity offsets strategy is based on protecting and managing a significant amount of land surrounding the disturbance footprint under a biodiversity stewardship agreement.”*

Request for more information: Could more information be provided about the biodiversity offset strategy?

Regarding the protection and management of biodiversity in relation to new any new powerlines, I request that the proponent please also view and acknowledge the recommendations made by the New England Biodiversity Reference Group. These can be found here:

https://cpagency.org.au/wp-content/uploads/2023/08/Submission_Recommendations-NE-Biodiversity-Reference-Group.pdf

In providing comment on the Environmental Impact Statement, Community Power Agency wishes to acknowledge where the proponent has taken initiatives to consult and plan well for this project, while also identifying opportunities to improve practice, which can then set a benchmark for other projects that will come.

Our overall aim is to advocate for communities to be hosting the best project possible for the site, with proponents planning for mitigations for impacts and a legacy that enables ongoing relationships and benefits to the people and environment.

Sincerely,
Heidi McElnea
on behalf of Community Power Agency