



NORTH COAST ENVIRONMENT COUNCIL INC.

North Coast Environment Council

Vice-President, Susie Russell

By email [susierussell2k8@gmail.com](mailto:susierussell2k8@gmail.com)

16 October 2023

**Attention: The Honourable Paul Scully MP**, Minister for Planning & Environment and Public Spaces.

**C/- Anthony Ko, Project Contact Planner, DPE**

Department of Planning and Environment, Locked Bag 5022, Parramatta, NSW, 2124

email: [Anthony.Ko@planning.nsw.gov.au](mailto:Anthony.Ko@planning.nsw.gov.au)

Dear Minister,

**Re: Submission of Objection by the North Coast Environment Council 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)**

Introduction:

The North Coast Environment Council formed in 1976 and is the peak umbrella environment group in northern NSW. We cover the area from the Hunter to the Tweed and west to the New England Highway. We also actively support other campaigns further afield. We receive no government funding and have no paid staff or central office. Our members and office-bearers work around the region, often travelling large distances to assist others as we organise in our defence of the environment and the communities it sustains.

The prime objective of the NCEC is to promote the cause of conservation and work for the better conservation of the North Coast of NSW. The NCEC is comprised of individual and group members who agree to the rules of the NCEC and contribute to our submissions and representations.

The NCEC are concerned about the impact the Proposed Oven Mountain Pumped Hydro Storage proposal will have on the extensive wilderness and World Heritage listed environments of the Upper Macleay River, recognised and first protected by the Wran Government in the Oxley Wild Rivers National Park in the mid 1980's. Many of the natural and cultural features of this landscape are unique and irreplaceable.

In this context it is inexcusable omission that the DA and EIS do not mention that part of the project area (including the two dam sites) is within an identified wilderness and even more of the project area is within the boundaries of the Oxley Wild Rivers National Park boundary, a proposal launched by then Premier Neville Wran in the mid 1980's and still current.

The NCEC believes the project is not environmentally, economically or socially justifiable and there are lower cost and lower impact alternatives to the proposal which have not been given consideration to date.

Whilst the time period for response has been unreasonably constrained we thank you and appreciate your making available and exhibiting the DA, EIS and accompanying documents, as well as the opportunity to provide an objection to the proposed Oven Mountain Pumped Hydro Storage Development Application.

From review of the Development Application and EIS our reasons for our submission for refusal of the DA include:

- The Project's scale and impact in this isolated and inaccessible area of identified World Heritage, wilderness and other natural heritage and cultural heritage values and amount of disturbance makes this expensive to develop and will adversely impact on: a natural area surrounded by such significant natural assets; Macleay River water quality; as well as existing infrastructure.
- Impact on Cultural heritage. The EIS recognises the project area and surrounds are rich in both pre-colonial and post-colonial cultural and historical sites; and that the health of the river, and its environments are key to the physical, cultural, and spiritual health of the Traditional Owners, the Thunggutti/Dhunggutti nation. A holistic approach is not undertaken and the processes applied in some cases are flawed.
- Planning and document issues: including the enormous amount of information but a lack of key details and analysis and difficulty in accessing key information.
- There are already more efficient and cost-effective and less disturbing 'Alternative' methods of longer-term storage of electricity with less energy loss-factors. For example: Big Battery technologies, which develop apace and will be even more efficient and recyclable by the estimated 5 year timeframe that the Oven Mountain facility is estimated to come on-line.
- Alternative less disturbing and 'Brown-field' sites are available for Pumped Hydro are not investigated and should be addressed in submissions to the NSW DPE Minister; as it is their job to assess alternatives strategically. They should have, in their feasibility assessment.
- The 'Business case' for the stated \$1.8billion project is highly questionable, given Snowy 2 and other pumped hydro project examples have all had massive cost overruns, delays and 'unforeseen' problems. The cost estimate provided is likely only for 'The Site' and does not consider transmission costs. Kempsey/Armidale Road upgrades needed are stated as being paid for by the Project, but constructed by Council(s); these costs are stated as omitted from the Project costing.

Off-site or associated public infrastructure maintenance costs to the tax-payer (i.e.: 'hidden' costs) are also not addressed in the EIS. If all these were included in the budget for cost/benefit and feasibility, the project would likely not stack-up.

- Decommissioning of the Site at 'end of life' (un-viability or long term) in such an important and extensive natural area with high environmental, cultural, scenic and recreation values

will not and can never be restored.

- The proposal will have serious and unacceptable impacts on Visitors to the vicinity of East Kunderang in Oxley Wild Rivers National Park.

Thank you for the opportunity to provide the attached objection and we look forward to working with all involved to achieve a good result for the community, economy, environment and water with which we live.

Yours sincerely

A handwritten signature in black ink that reads "Susie Russell". The script is cursive and fluid, with the first name "Susie" and last name "Russell" clearly distinguishable.

Susie Russell

North Coast Environment Council

#### Attachments

1. NCEC detailed submission on the Proposed Oven Mountain Pumped Hydro Storage Proposal
- 2 Attachment 1 to submission: Chapter 10 (p 285-291) from Apsley Macleay Natural Resources and Landuse Study- A case for a national park. NPWS 1985 .