

SOMR's order of preferred options for the Project DA Assessment and Determination are.

1. **Refused/Declined** (not be Approved).
2. **Deferred**, until the many important further studies and plans required to inform the Assessment are completed satisfactorily and re-exhibited for comment/submissions. – *The EIS proposes these be done after Approval, which will not assist holistic assessment of the project's feasibility, cost or impacts.*
3. **Conditional Approval**, subject to satisfactory resolution of the many important further studies and plans required to inform the Assessment, and subject to review, comment concurrence from all submitters.

Reasons for our submission for DA **Refusal/Decline** include:

- The Project's scale in this isolated and inaccessible area and amount of disturbance proposed makes this expensive to develop and will adversely impact on such a natural area surrounded by such significant natural assets, Macleay River water quality as well as existing infrastructure.
- Decommissioning of the Site at 'end of life' (un-viability or long term) in such a natural area with high environmental scenic and recreation values will not and can never be restored.
- 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 a-pace and will be even more efficient by the estimated 5years timeframe for the Oven Mountain facility is estimated to come on-line and are largely recyclable.
- 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. Not the Proponent. – *But 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. – *The Lendlease proposal for Pumped Hydro here, 20 odd years ago, was dropped because 'it did not stack-up.'*

Reasons for our submission for DA **Deferral** include:

The Proposal defers address of many important matters to the 'detail design stage;' many of which should be resolved at this DA stage to ensure all matters are fully addressed for over-all feasibility and holistic cost/benefit analysis in the Assessment process for Determination. These matters/plans for address should be re-exhibited for comment/submissions and include but are not limited to:

- Construction Traffic Management Plan,
- Aboriginal Cultural Heritage Management Plan;
- Additional Geology/Geochemical testing;
- Erosion and Sediment Control Plan,
- River level/flow to permit uptake,
- Social Impacts (Medical, Policing, School zones),
- Waste Management Plan,
- Project costings, and
- Decommissioning Plan at end of construction and 'End of Life.' etc...

Reasons for our submission for DA **Conditional Approval** are similar to the above, but this is not SOMR's preferred option, as there is an increased likelihood of the project going ahead without public consultation or scrutiny, due to no re-exhibition by stakeholders or submitters.

The matters for address in the DA & EIS to for you to formulate your submissions are, as best possible given the time-frame, included in our assessment of Summary and Detail issues for address. SOMR will develop its own submission based on these.

In summary: A few words for your consideration for inclusion your submission...

It is believed this Project is/will be redundant; as alternative technologies to store electricity at this scale and duration are improving at such a rate; if not quite now but certainly by the time (4-5 years?) the OMPHS is scheduled to become operational.

It is believed this Project Proposal development is already out-dated and it does not 'stack-up' on an overall and holistic cost/benefit assessment. - Especially as: Some significant costs have not been included, disclosed and are under-estimated; there is potential for downstream contamination and the site can never be fully restored on decommissioning. The Macleay, Local Council Areas' communities and high environmental, tourist experience and cultural values will be diminished; left with an ongoing cost burden and a 'Stranded Asset' - or should that be a 'Liability'?

The one positive/benefit to come out of the feasibility study and the DA an EIS is a potential alternative road route for the Kempsey - Armidale Road. OMPS proposes this Site access route for good reason: It is more reliable and cost efficient. While Government is funding and constructing a very expensive upgrade of the Flying Fox and Jobs Cuttings, which will never be stable. Whereas, the OMPS proposed 'eastern access route' (EAR) will not have ongoing significant landslips. While involving construction of 2 bridges across the Macleay and the cost of developing a 'Class 3' road along this alignment will be, or would have been, far less than what is being funded for upgrade of the cuttings.

This benefit could have happened (and possibly still can?) had the then State & Local Govt looked at alternatives! Importantly; this can happen with or without the OMPS Project and could still be a future option for the Kempsey to Armidale Road should/when the current landslip treatments fail.

RMH comment:

What is needed is short term good value resolve; as the technologies advance so rapidly. This and the variable options of large, medium and small-scale generation, storage and transmission; is already confusing AEMO, DPE and NSW strategists. Sadly, they cannot wrap their heads around it, and its delaying progress to renewables so urgently needed to stop climate change impacts affecting us all.