



Lithgow Environment Group Inc.

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www.lithgowenvironment.org

Preserving the balance of nature.

25 April 2026

Attention: Jess Watson

NSW Department of Planning & Environment

RE: LAKE LYELL HYDRO ENERGY STORAGE PROJECT - APPLICATION NUMBER CSSI-77018220

Lithgow Environment Group Inc. (LEG) is a local group formed in 2005 to protect, conserve, and enhance our unique natural environment, landscapes, flora, fauna, and waterways. Our Project Officer Ms Julie Favell has been a LEG representative on the Mount Piper Energy Australia Lithgow Region Community Consultative Committee for 18 years.

Our group would like to highly commend Energy Australia on the extraordinary level of community engagement and consultation undertaken prior to the release of this EIS.

Our members could not reach an overall consensus on this proposal, and are therefore lodging this submission as Comments only. We do however request that NSW Planning hears the voices of all our members and local citizens by considering the reasons for Support, Oppose, and Recommendations.

Comments in support:

- Support the NSW Government's renewable energy transition goals and acknowledge that long-duration storage infrastructure is genuinely necessary.
- LLPH will enable excess solar and wind energy generated during the day which is increasingly being curtailed to be stored for use during morning and evening peaks.
- We are in a climate emergency and must urgently transition away from fossil fuels. Pumped hydro and other batteries are essential to make this transition possible.
- Any project of this kind has environmental effects but the positive effects of climate change mitigation outweigh the local losses of the environment. After all, climate change will change everything.
- Lake Lyell is an ideal location for pumped hydro because it –
 - uses an existing man-made lake for the bottom reservoir,
 - has sufficient water supply,

- a mountain to build the top reservoir,
- existing electricity infrastructure to connect to the national grid, and
- proximity to Sydney, a major market for electricity.
- The project has potential to develop local tourism by:
 - Building the construction camp in a way to repurpose it as tourist accommodation once construction has been completed,
 - Providing access to the top reservoir with a viewing platform and a water slide
 - Improving recreational infrastructure at Lake Lyell
- An investment of this magnitude will have positive effects on the local and regional economy.

Comments opposing:

- LEGs logo pictures a Platypus, a mountain, and a river. This project is an assault on all three.
- Right project, right reasons, but wrong location, and failure to consider superior alternatives.
- Inadequate Biodiversity Assessment, Aquatic Ecology, and Surface Water Reports.
- Long-term survival of genetically isolated Platypus in Farmers Creek cannot be assured.
- Inadequately assessed and unresolved Aboriginal cultural & European heritage impacts.
- Decades of accumulated heavy metal & salt pollution in Lake Lyell will be mobilised by daily 2m tidal fluctuations, adversely affecting macroinvertebrates, fish, platypus, and all aquatic life.
- Biodiversity offsets cannot genuinely compensate for the loss of high-quality habitat.
- Excess electricity generated by burning coal will be used to pump water uphill when the sun doesn't shine and the wind doesn't blow. LLPH may even prolong the life of Mt Piper PS by providing a market for electricity that is currently unsaleable. Unless renewable energy only is used to pump water uphill, then LLPH can't truly be regarded as clean, green renewable energy.
- The EIS fails to identify that Coxs River flows have been artificially inflated since 2008 when the Springvale Transfer commenced discharging up to 42 ML/day, significantly more than natural flows of 3 - 8ML/day. Minewater inflows will cease once Springvale Mine closes. McPhillamy's Mine plans to pump 15.6ML/day from Angus Place Mine to Blayney. Climate change will cause more severe & prolonged droughts in future. The long-term viability of LLPH cannot be assured.
- EA/EDF could use the existing Thompsons Creek Reservoir (1030m) and pipelines to Lake Lyell (785m) with similar 'head' for pumped hydro, and save on pumping costs by using excess Springvale Transfer water currently flowing to waste from Thompsons Creek Dam. This would prevent the needless destruction of Mount Walker – a National Park in-waiting.
- EA/EDF could use existing pipelines from Oberon Dam (1080m ASL) and Duckmaloi Weir to Mount Piper PS/Wallerawang PS/Lake Wallace/Lake Lyell for pumped hydro.

- LLPH doesn't have to destroy pristine natural environments, nor build in a National Park in-waiting (Mount Walker), nor build near a large lake. The method suggested by Andrew Blakers ANU was to build 'oversized farm dams' at the top & bottom of hills and recirculate that water up and down repeatedly, the key factor being 'head'. There are numerous suitable sites on cleared grazing land with much higher 'head' than along the 300kv Sydney South - Wallerawang - Ingleburn Transmission Line, for example near the 6 Foot Track Kanimbla Valley with 600m head.
- Construction activity and disturbance will inevitably spread serious weeds (many of which were not identified in the EIS/BDAR), pests and diseases (eg. *Phytophthora cinnamomi* and Myrtle Rust weren't identified). The EIS plans to develop a plan (though don't say fully funded) for weed control. However, history proves that weed control has been totally ineffective in the past.
- National security concerns about handing control of critical Sydney drinking water and power generation assets to the French Government (Électricité de France) for 80+years.

Recommendations:

- Repurpose the existing and now largely redundant pipeline from Lake Lyell to Thompsons Creek Dam for Pumped hydro, negating the need to destroy a National Park in waiting - Mount Walker.
- Relocate the project to the north side of Mount Walker which has fewer biodiversity, visual, and amenity impacts, could have 20m higher head, gentler contours to build a 40m high upper dam wall, doesn't require the diversion of Farmers Creek, nor 4 temporary and a permanent bridge.
- Incorporate the southern side of Mount Walker into Marrangaroo National Park.
- The construction camp should be built in a style and located at a site so it can be repurposed for tourist accommodation, and improve recreational facilities at Lake Lyell.
- The Town Camp site is not regarded as suitable by our group because of unacceptable impacts on existing residents in Silcock Street, and we note the construction of Bunnings may start soon.
- The NSW Government must reinstate NoRBE (Neutral or Beneficial Effects) and maintain salinity in the Coxs River to <350 EC to protect platypus and all aquatic life.
- It is unacceptable that Flora and Fauna surveys were limited to the direct construction footprint only, omitting the 33km riparian zone of Lake Lyell and tributaries which will be impacted by a 2.9 reduction in water levels for 5 years during construction, and 2m daily fluctuations after.
- Additional targeted Flora & Fauna surveys must be required in the correct survey seasons and correct habitats including the entire riparian zone for all threatened species missed in the BDAR and EIS including but not limited to *Asterolasia buxifolia* (CE), *Callistemon megalongensis* (CE), *Callitemon purpurascens* (CE), *Purple Copper Butterfly* (E), Southern Greater Glider (E), Long-nosed Potoroo (V), Eastern Pygmy Possum (V), Latham's Snipe (V, Migratory), Pilotbird (V), Diamond Firetail (V), Blue-billed Duck (V), and White-bellied Sea Eagle (V).

- Threatened Species Credits have only been required for 7 threatened species when 20 Commonwealth and/or State threatened species are known or are highly likely to occur on site. Reasons why should be clearly explained.
- The EIS only identified a limited number of plant species on-site, and many species recorded by LEG members over the past 20 years in that area are missing. We are concerned that because so many common plant species weren't identified, that all PCTs may also not have been identified. For example, PCT3226 is not listed in the EIS nor Ecosystem Credits required, yet it is mapped on the NSW Government *Trees Near Me* site on the south side of Mount Walker.
- Energy Australia should identify the entire suite of plant species characterising the site, including the 33km riparian zone, rather than relying on a select few species in the construction envelope.
- No electricity generated by coal, gas, burning waste, or nuclear should be used to pump water uphill, and only genuine Renewable Energy (eg. Wind, Solar) must be used. Otherwise LLPH cannot be classified as clean, green nor renewable energy.
- Community Benefit funding should be provided to UNSW to continue Platypus and habitat monitoring for the life of the project.
- Community Benefit Funding to monitor endangered Purple Copper Butterfly for the project life.
- Site rehabilitation should include *Asterolasia buxifolia*, River She-oak, Bottlebrush, Silver Banksia, and all native species that Energy Australia failed to identify in the EIS/BDAR.
- Develop an Indian Mynah Control Program for Lake Lyell.
- Develop an eastern Pygmy Possum Nest Tube Program for Lake Lyell and surrounds.
- Strengthen Legislation & Regulations to ensure renewable energy projects do not disturb legacy pollution from fossil-fuel power generation to impact on waterways, nor lead to greater losses of Endangered Species, Threatened Ecological Communities, and natural environments.

Thank you for considering the diverse range of views of our group members, and thank you for the opportunity to provide feedback.

Yours Sincerely

Julie Favell

On behalf of the Lithgow Environment Group Committee

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