



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

NSW Government Planning Dept
State Significant Infrastructure

Submitted via Major Projects Portal

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Submission re: **SSI-77018220 Lake Lyell Pumped Hydro Energy Storage**

The Blue Mountains Conservation Society is a community volunteer organisation with over 900 members, which has been in existence for over 60 years. The Society's aim is to help conserve the natural environment of the greater Blue Mountains and to increase awareness of the natural environment in general. The Blue Mountains Conservation Society would like to make a submission in relation to Development Application SSI-77018220 - Lake Lyell Pumped Hydro Energy Storage

The Society opposes this development as the 385MW 8h 3GW scale of the energy generated, versus the substantial negative environmental impact outweighs the benefit of its contribution to sustainability, and the transition from fossil fuels to renewable energy.

The Society acknowledges this project will ultimately reduce emissions and coal power generation. However, the Society believes that pollution will continue in the local environment. We oppose non-renewable forms of electricity generation i.e coal, gas, waste-to-energy being used in the interim to pump water uphill. This project must use 100% renewable energy derived from solar and wind supported by Battery Energy Storage Systems.

What is the real impact of this project?

The Society notes:

- An EIS or Flora & Fauna assessment was not done before Lake Lyell was flooded in 1982, and assessments have not been conducted in Marrangaroo National Park since 2007. So current species are unknown.
- The current Biodiversity Assessment Report is highly deficient because all flora & fauna surveys were limited to the direct disturbance footprint only, and not the 30km riparian zone of Lake Lyell which will be impacted by lowering the water level by 2.9 metres for 5 years during construction, and 2 metres daily for the next 80-100 years.
- The riparian zone supports the highest diversity of plants and animals including frogs, reptiles, birds & insects, yet was not surveyed. Threatened Species

Ecosystem Credits have only been calculated for 8 threatened species, when 20 Commonwealth/State listed threatened species are known to occur or are considered likely to occur.

The project entrenches privatisation of public land

- Mount Walker was publicly-owned land before being sold to Energy Australia in 2013. The land should have been included in Marrangaroo National Park when reserved in 2007 and it should be returned to the people of NSW now.

Environmental Impact

- Analysis of weeds, pests and diseases is not comprehensive; eg. the Weed of National Significance (WONS) Gorse (*Ulex europaeus*) isn't even mentioned nor is *Phytophthora cinnamomi*.
- At the least, top soil from clearing native forest must be stored and seed collected for use in rehabilitation afterwards.
- Lithgow local native plant community nursery should be invited to produce plant stock to rehabilitate disturbed areas throughout the life of the project.
- Healthy populations of platypus must be maintained. This species is currently listed as “Near Threatened” under the International Union for Conservation of Nature (IUCN) Red List. The proponent must establish a funding program to allow the current UNSW Platypus Conservation Initiative program to continue throughout construction and for the 80 years life of the project.

Water availability not assured for both environmental flows and Pumped Hydro operations for the project life

- The EIS fails to disclose that Coxs River inflows into Lake Lyell have been artificially inflated since 2009 when the Springvale Transfer commenced. Mine water inflows of up to 42 ML/day are far greater than natural flows of 3 -5 ML/day, but will cease when Springvale mine closes after 2028.
- The EIS also fails to identify that McPhillamys Gold Mine is currently being assessed to transfer 15.6 ML/day of Mine water to Blayney, further reducing Coxs River & Lake Lyell inflows.
- The EIS fails to state the environmental negative impact by low water infeed, and pumped hydro operations. Historically there has been little or no water flow into the dam, highlighted when the Fusegates failed, Lake Lyell did not spill for the 11 years between 1999 and 2010.-
- Water security for this project cannot be assured for the next 10 years, let alone the 80 year life of this project.

Right project, right reasons, but the wrong location

- There is a failure to consider superior/cheaper/less environmentally destructive alternatives. For example, the existing and now largely redundant pipeline from Lake Lyell to Thompsons Creek Dam could be repurposed for Pumped hydro, negating the need to destroy a National Park in waiting - Mount Walker.

- The long-term survival of a genetically isolated Platypus colony in Farmers Creek cannot be assured.
- Aboriginal cultural heritage and European heritage impacts are inadequately addressed & remain unresolved.
- Decades of accumulated heavy metal & salt pollution in Lake Lyell will be mobilised by daily water fluctuations, adversely affecting macroinvertebrates, fish, and platypuses.

Inadequate Biodiversity Assessment, Aquatic Ecology, Surface Water, Heritage Reports

- There is a failure to meet Minimum Survey Requirements for the correct survey seasons or correct habitats for *Asterolasia buxifolia* (Critically Endangered: Commonwealth and State) and the endangered Purple Copper Butterfly (*Paralucia spinifera*).
- The stated disturbance footprint of 137 ha hugely under-estimates the actual disturbance area (219 ha) as it does not include the 30km riparian zone of Lake Lyell (66 ha) nor road widening and upgrades to Magpie Hollow Road and Sir Thomas Mitchell Drive (16 ha).
- The southern side of Mount Walker targeted for destruction supports a locally rare vegetation community: PCT3226 Western Blue Mountains Montane Wet Fern Forest. Should the project proceed, the northern side of Mt Walker, which supports locally common PCT3735 Central Tablelands Peppermint Shrub- Grass Forest, a plant community of lesser conservation significance, would be better suited for development, although an existing degraded site would be most preferable.

Still powered by fossil fuels

- Excess electricity generated by burning coal will still be used to pump water uphill when the sun doesn't shine and the wind doesn't blow. The project 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 the water uphill, then LLPH cannot truly be regarded as clean, green nor genuine renewable energy.

The local environment is negatively impacted

- Biodiversity offsets can't genuinely compensate for the loss of high-quality vegetation communities and the habitat they provide for local fauna.
- Salinity and heavy metal pollution of the Coxs River upstream will continue unabated from coal mining/burning, exacerbating the water quality issues surrounding this proposal.
- There is a failure to adequately assess the Weeds of National Significance that are likely to be spread by disturbance/tidal fluctuations, and failure to mention waterborne pathogens (eg. *Phytophthora cinnamomi*)

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. However, the environmental impact of the proposed project outweighs the benefit of its contribution to sustainability and the transition from fossil fuels to renewable energy.

Therefore, **Blue Mountains Conservation Society opposes this project.**

Thank you for the opportunity to comment on this development. If you have any queries in regard to this submission please contact me on president@bluemountains.org.au or mobile XXXX.

Yours sincerely

Annette Sartor
President
Blue Mountains Conservation Society