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2 October 2021

also by email to electricity.roadmap@dpie.nsw.gov.au

Dear Sir,

<https://www.planningportal.nsw.gov.au/ISEPP-renewable-energy>

You have invited submissions to inform the third tranche of regulations for the Electricity Infrastructure Investment Act. Submissions close on 11 October.

On exhibition is your paper “Renewable Energy and Regional Cities”, dealing with proposed changes to the rules for where renewable energy projects can be built. These changes will amend the SEPP (Infrastructure) 2007 to require consent authorities to consider if a proposed development will:

- conflict with existing or approved uses of the land, such as land zoned for residential use
- significantly impact or conflict with land needed to support the growth of a regional city (identified in local and regional strategic plans or on the advice of the relevant council)
- significantly impact the scenic quality and landscape of the regional city

The Explanation of Intended Effect on page 6 defines Electricity Generating Works as including Pumped Hydro, and as including “Electricity Storage”.

Page 5 says “the matters of consideration would apply to land within 10 kilometres of land zoned B3 - Commercial Core, and within 5 kilometres of any residential land zoned R1 – General Residential, R2 – Low Density Residential and R3 – Medium Density Residential.”

My submissions are as follows:

1. The impacts on residential areas, particularly in growing regional centres, is no different from commercially zoned precincts, indeed potentially worse, and so the distance requirement for residential zonings R1, R2 and R3 should be 10 kilometres, not 5 kms.
2. Rural Villages are potentially equally if not worse affected by Electricity Generating Works. The distance requirements should apply to them also i.e. those areas zoned RU5, and they should be protected for 10kms also. They are often an integral part of rural precincts, and those nearer major centres such as Bathurst, and indeed Sydney and the Blue Mountains are becoming ever more desirable for new residences, so space needs to be reserved.
3. The Pumped Hydro Roadmap, on which the whole government policy on pumped hydro electricity storage is based, is **fatally flawed** in two respects:
 - The Pumped Hydro Roadmap is based on topography – places with deep valleys and nearby high mountains, not on the availability of water.

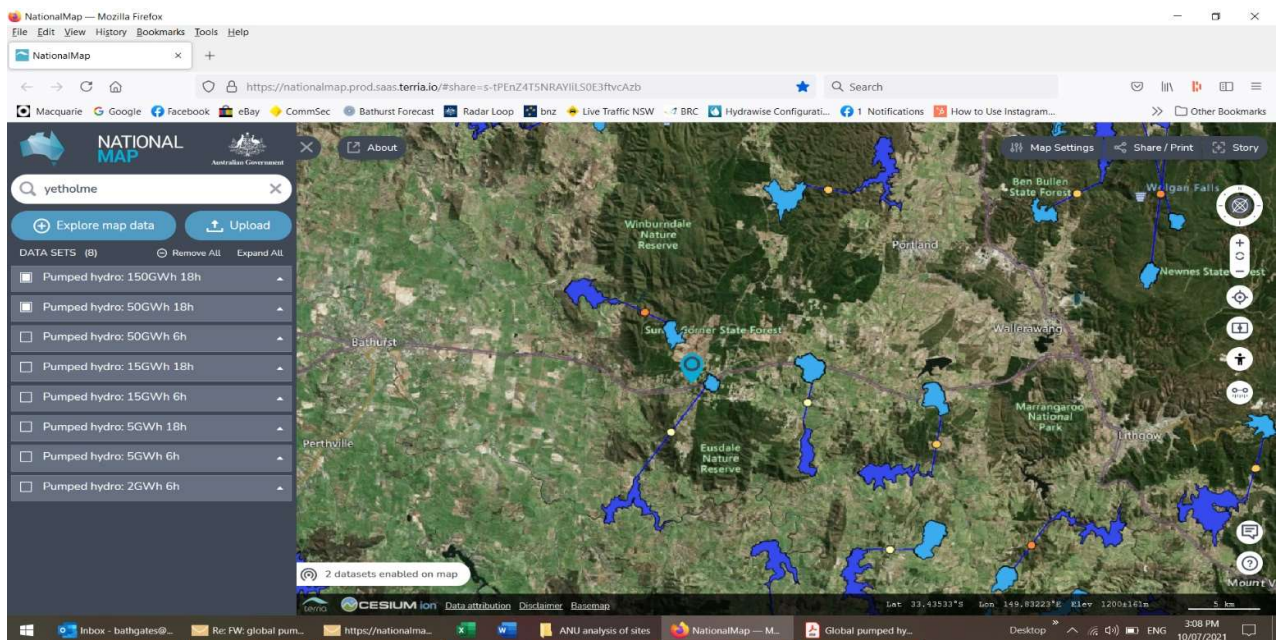
Nowhere in either electricity related Roadmap is a scientific appraisal of the availability of water.

To elaborate, the NSW Government in 2018 invited private enterprise to put forward pumped hydro proposals based on its Pumped Hydro Roadmap, which uses site data developed by the Australian National University. The ANU study over and over stresses that pumped hydro needs to be “off river”. The ANU study is based on topography alone, and has no consideration of the availability of water.

- The NSW Government in 2018 invited private enterprise to put forward pumped hydro proposals based on its Pumped Hydro Roadmap, In that Roadmap Minister Don Harwin was quoted as making the following assertion, without providing any evidence for it ... *“our State is blessed with significant water resources that provide fertile ground for pumped hydro investment”*. The reality is abundantly the opposite - west of the Great Dividing Range there is not an abundance of water, indeed there is a scarcity of water. Those of us who live with drought every few years know this too well.

Therein lies a major concern, namely, that water west of the Great Dividing Range in NSW, and in other dry parts of the continent, is not abundant. It is a scarce strategic asset, and just about every litre of water already flowing west, or stored already in the west, has someone's name already on it. That means that if water is locked for pumped hydro it has to be taken from someone, including the Murray Darling Basin.

Around Bathurst, the ANU study Roadmap identifies many pumped hydro sites which potentially lock away huge volumes of water forever, water that is relied on by locals, farmers, communities and the environment. E.g. illustrated below to the east of Bathurst - these would decimate our local water supply:



My submission is that **only Batteries must be mandated for electricity storage proposed for west of the Great Dividing Range**, except where existing water storages are redundant.

So, unless rigorous public policy is determined for the siting of pumped hydro projects as regards the water needed to service them, large volumes of water needed to store power will be taken forever from inland farmers, communities and the environment.

Yours sincerely,

AW Sandy Bathgate

