Kingswood Battery Energy Storage System Submission

Project name: Kingswood Battery Energy Storage System
Application number: SSD-63207219
Address of the land in respect of which the development application is: 744 Burgmanns Lane, Kingswood 2340

14/8/2024

As a local resident concerned by the rapid and potentially damaging changes to our idyllic rural environment, I have conducted a review of the 212 page Environmental Impact Statement and associated documents available on the NSW State Government Planning Portal in regard to the proposed Kingswood Battery Energy Storage System.

I am surprised and worried by the lack of due diligence in the published EIS document which has outdated and inaccurate figures around the current, excess and cumulative traffic on local roads, and includes a Bushfire Assessment that completely ignores the issue of placing a large-scale installation of lithium batteries on bushfire prone land in close proximity to 665 homes.

It is hard to believe that the adjacent and very similar Tamworth BESS project developer documented that the noise issues for that project will exceed acceptable limits for some to all of the 38 homes within a 1km radius 24 hours a day, while for this development there will be no noise issues apart from for the closest homeowners.

With an additional BESS planned on the same block, 400m from this project (Tamworth BESS) and the approval of the Calala BESS, 500m from this project, the cumulative effect of all developments especially on the noise, traffic, underground water systems and fire risk have not been thoroughly investigated, as stated in the EIS.

Also relative in the cumulative effect is the 3,500 acre Lambruk Solar Project, 7km to the south, also including a BESS. This project will utilise some of the same road network, and require the same services especially for imported workers. There is no argument that the dangers of this development will be outweighed by ongoing local employment with only “up to” 2 full time equivalent jobs provided by ongoing operation.

For this submission I have followed the sections as listed in the EIS.

Legend:
- *Italics* indicate direct text from the EIS or associated documents provided by the developer or the contractors engaged by them.

- Text in brackets ( ) has been added for clarification or underlined for emphasis.

- **Comment**: in **bold** is added narrative.

- **Question**: in **bold** is asking for an answer.

The Battery Energy Storage System would operate 24 hours a day, seven days a week and would be monitored remotely, with infrastructure maintenance occasionally undertaken on-site.

The project is 100% owned by Iberdrola SA.

Comment: Iberdrola SA is a Spanish based company, with the top ten shareholders who are all overseas based listed below.

Question: To what extent is the Australian taxpayer bankrolling this project, for the benefit of overseas investors?

https://www.marketscreener.com/quote/stock/IBERDROLA-S-A-355153/company-shareholders/

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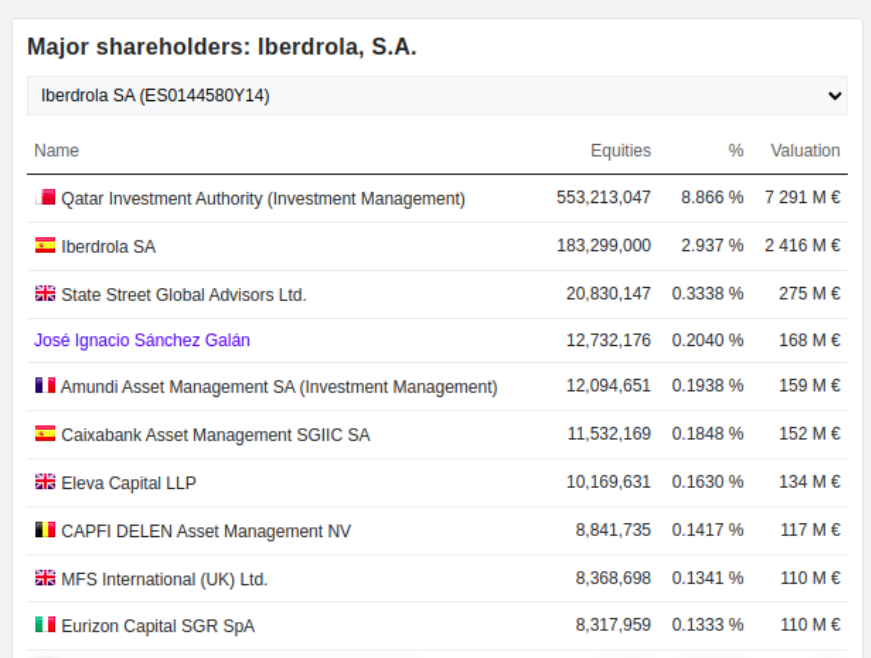

Major shareholders: Iberdrola, S.A.

Iberdrola SA (ES0144580Y14)

Name	Equities	%	Valuation
Qatar Investment Authority (Investment Management)	553,213,047	8.866 %	7 291 M €
Iberdrola SA	183,299,000	2.937 %	2 416 M €
State Street Global Advisors Ltd.	20,830,147	0.3338 %	275 M €
José Ignacio Sánchez Galán	12,732,176	0.2040 %	168 M €
Amundi Asset Management SA (Investment Management)	12,094,651	0.1938 %	159 M €
Caixabank Asset Management SGIIC SA	11,532,169	0.1848 %	152 M €
Eleva Capital LLP	10,169,631	0.1630 %	134 M €
CAPFI DELEN Asset Management NV	8,841,735	0.1417 %	117 M €
MFS International (UK) Ltd.	8,368,698	0.1341 %	110 M €
Eurizon Capital SGR SpA	8,317,959	0.1333 %	110 M €

Traffic and transport

Construction The TIA (Traffic Impact Assessment) assessed the impact of Project related and potential cumulative traffic volumes on the road network to determine whether there is sufficient road network capacity and to ensure the existing road network will be adequate to accommodate the additional traffic movements generated by the Project. Peak construction traffic movements are anticipated to comprise:

• Up to 80 light vehicles per day (80 in and 80 out)

• Up to 60 heavy vehicles per day (60 in and 60 out), inclusive of oversize or overmass vehicles up to 35 metres with 14 axles. Heavy vehicle access to and from the Project would use Ascot-Calala Road via Whitehouse Lane to minimise the potential for traffic impacts through the urban portion of Calala.

The TIA identified the existing road network would accommodate Project related traffic within the capacity of the surrounding road network. In the event concurrent nearby developments were constructed at the same time, the cumulative traffic volume was identified to be below the level of service (LOS) D threshold. (NB – however the figures are not correct and have been underestimated – see comment on Figure 4-2 Cumulative traffic impacts).

Kingswood BESS – Traffic Impact Assessment App D - TIA 6

Ascot-Calala Road and Burgmanns Lane fronting the Project Site are two-way unsealed local roads controlled by TRC, with speed limit of 60 kilometres per hour (Incorrect – Ascot Calala Rd has a 100km speed limit). *Ascot-Calala Road has north-south orientation and intersects with Burgmanns Lane to the north and Whitehouse Lane to the south. Whitehouse Lane is a two-way sealed local road with a speed limit of 100 kilometres per hour.* (Incorrect – Whitehouse Lane from Goonoo-Goonoo Rd to Ascot Calala Lane has an 80km speed limit).

2.4 Traffic volumes

Comment: The traffic volumes quoted for Ascot Calala Rd are from 2017 – they are 7 years old and not at all reflective of current volumes, especially with the additional housing that has been built in the area in that time.

The figures for Burgmanns Lane are from 2018 – so they are six years old – again these figures are not relevant or accurate – these roads are the main proposed routes to the site.

2.7.2 Burgmanns Lane causeway replacements

Comment: It is 2024 and there is no sign of upgrades to Burgmanns lane taking place – it is currently inaccessible to B-doubles or large oversize vehicles and it floods regularly.

2.7.3 Adjacent developments

Calala BESS (SSD-52786213) located at 57 Burgess Lane, Calala.

Comment / update: This project is approved.

Tamworth BESS (SSD-23830229) located at 696 Burgmanns Lane, Tamworth.

Comment: The traffic studies included in the EIS for this project were inconsistent and contained conflicting information on the amount of traffic disruption from this project which is on the same block of land as this proposal.

However, figures given in an IMPACT study (page 149 of the EIS) of an increase of 46% Burgess Lane and 62% Burgmanns Lane are assumed to be correct.

2.7.4 Regional development
Besides the above two adjacent developments, there are five other regional developments proposed within 30 kilometres of the Project Site, including the following:

• Lambruk Solar Farm (SSD-67436209) located approximately 15 kilometres south of Tamworth consisting of a 500MW solar farm with 300MW BESS facility and associated infrastructure. Construction is expected to commence in 2025 and expected to take 24 months to complete. Site access is proposed via Duri-Dungowan Road from New England Highway for direct heavy vehicles and light vehicles, Kia Ora Lane may be potentially for some light vehicles access, Marsden Park Road and Ascot-Calala Road are considered potential secondary access points.

3.2 Site access

Vehicular access to and from the Project is proposed via Ascot-Calala Road along the eastern boundary of the site, a 60 kilometre per hour unsealed dual lane local road. (Incorrect – Ascot Calala Rd has a 100km speed limit).

3.5 Traffic generation

3.5.1.1 Light vehicles

During the construction peak of the Project, it is expected that up to 100 full-time equivalent people would be employed during the construction of the Project.

For the purposes of this assessment, it has been assumed that there would be an average occupancy rate of 1.25 workers per vehicle (i.e., one in four cars has an occupancy of two workers). Accordingly, during construction, 80 light vehicles would be expected to access the Project Site in the morning, and 80 light vehicles would be expected to egress the Project Site in the afternoon.

3.5.1.2 Heavy vehicles

It is expected that for during peak construction period, construction activity will result in up to 60 heavy vehicles (one-way) per day.

From the Traffic and transport section earlier in the document:
Up to 60 heavy vehicles per day (60 in and 60 out).

Comment/correction: one would assume that 60 vehicles one way (so they don't leave?) is incorrect.

• *AM and PM peak hours: - 10 inbound heavy vehicle movements - 10 outbound heavy vehicle movements - 80 inbound light vehicle trips.*

Comment: The current "design capacity of the roads" of especially the unsealed gravel roads is notoriously inadequate and unsafe for what is required for the current traffic levels.

The Whitehouse Lane bridge is also flood prone, and can be inaccessible after rain.

4 Traffic assessment

4.1 Construction traffic

4.1.1 Construction vehicle generation

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Road	Existing AADT (two-way) [1]	Existing peak hour volumes (two-way) [2]	Anticipated ADT increase (two-way) [3]
Ascot-Calala Lane	78	8	280 (359% increase)
Whitehouse Lane	593	59	248 (42% increase)
Goonoo Goonoo Road / New England Highway	6,289	628	280 (4% increase)
Burgmanns Lane	1,348	135	32 (2% increase)

[1] Existing traffic volumes (2023) discussed in Section 2.3 with applied traffic growth factor.

[2] Peak hour volumes assumed to be 10% of daily traffic.

[3] Average vehicles per day multiplied by two consider two-way trips.

Comment: There is an anticipated 359% increase to traffic on Ascot-Calala Lane and 42% for Whitehouse Lane, for this project alone.

Table 4-2: Cumulative traffic movements

Road	Peak hour volumes						Level of Service
	Existing	The Project	Calala BESS	Tamworth BESS	Goonoo Goonoo Road Upgrade	Cumulative volume	
New England Highway / Goonoo Goonoo Road	628	100	102	5	20	855	~LOS C
Whitehouse Lane	59	84	102	5	0	250	LOS A
Burgmanns Lane	135	16	102	5	0	258	LOS A

During the construction of the Project, Whitehouse Lane, Burgmanns Lane and New England Highway would accommodate up to 100 additional vehicles during the peak hours, which is within the capacity of the surrounding road network. In the event all three BESS projects are constructed at the same time, the cumulative traffic volume is expected to be 855 vehicles in the peak hour, which is slightly higher than the LOS C threshold, but well below the LOS D threshold of 1,340 vehicles.

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Question: The adjoining and very comparable project Tamworth BESS is projected to have a peak demand of 170 daily movements (85 vehicles in/out) – so why does the table above only include 5 movements for the major access road for the region, the New England Highway on which all traffic must travel to access both sites?

Comment: Whitehouse Lane is also a major access route for the Tamworth BESS, including their primary route for construction deliveries, including up to 140 OSOM movements daily, therefore the figure of 5 vehicles per day resulting from that development in the table is also a clear underestimation of the real figure.

The figures in this table appear to have been deliberately underestimated especially given the availability of the documentation on the Tamworth BESS and that the developments are of a similar nature and size.

https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-23830229%2120240523T064501.592%20GMT

Tamworh BESS is a very similar project. From their EIS:
An anticipated peak demand of up to **170 daily movements** is expected during Stage 2 and Stage 3.

A total of 85 return-trips, comprising of 80 light vehicles and 5 heavy vehicle trips is expected daily during the peak construction periods. A total of up to **140 movements for OSOM** is anticipated (for the delivery of the BESS components) during Stage 3 of construction.

Traffic data undertaken in December 2023 indicates that Whitehouse Lane carries approximately 500 vehicles per day and up to 50 vehicles during the peak periods.

Primary Route for Construction Deliveries (Calala Lane and Burgess Lane) Tamworth Intermodal Rail Facility - Goddard Lane - Wallamore Road - Jewry Street - Ebsworth Street - **New England Highway - Whitehouse Lane** - Marsden Park Road - Calala Lane - Burgess Lane - Subject Site

Question: Why is the Route E for the Tamworth BESS via Whitehouse Lane not mentioned in the comparison?

From the EIS:
Traffic generated during construction of the Project is not expected to compromise safety or function of the surrounding road network and impacts are expected to be mitigated.

Comment: The local gravel roads are not maintained regularly enough to prevent large potholes and uneven, unsafe surfaces with current traffic levels, especially after any rainfall. They would require upgrades and continual maintenance to ensure safety especially for the anticipated heavy vehicle traffic.

Noise and vibration
2.1 Locality
There are 38 receivers (including 1 associated) within approximately 1 km of the Project Site.

6.2.1 Construction road traffic noise generated by the Project
Comment: This section does admit a 359% rise in traffic on Ascot-Calala Road, from this development alone, but does not take into account the following:

6.1.4 Cumulative construction noise
There is a possibility that the construction noise of the proposed Kingswood BESS may generate cumulative noise impact with the following nearby BESS developments:
- Tamworth BESS (at planning stage) (SSD-23830229).
- Calala BESS (now approved) (SSD-52786213).

The receivers that would potentially be impacted by the cumulative construction noise of the Project and other proposed BESS projects are receivers in proximity to Kingswood BESS and in-between other BESS developments.

7.1 BESS operational noise
7.6.1 Other BESS projects
Currently available information from the other two BESS projects has been reviewed and compared with the noise impact predictions of the Project. This was based on the following:
- Predicted noise impacts from Calala BESS were extracted from the publicly available report EIS Noise and Vibration Assessment Rp 001 20220648 dated 18 August 2023.
- <u>No public data was available for Tamworth BESS.</u>

Comment: This is not the case – from the EIS for the Tamworth BESS, conducted by the same author – Resonate:

* Neutral weather condition:
- The BESS operation during the daytime is expected to **exceed the NPI daytime 40 dB(A) criterion at residential receivers** R01 to R09, R13, R16 and R20. Operational noise impacts at all other receivers have been predicted to comply with the daytime criterion. The daytime operational noise levels during neutral weather condition are predicted to exceed the daytime criterion **by up (to) 13 dB(A).**
- The BESS operation during the evening is **expected to exceed the NPI evening 39 dB(A) criterion at residential receivers** R01 to R09, R13, R15 to R17, R19 and R20. The evening operational noise levels during neutral weather condition are predicted to exceed the evening criterion **by up to 14 dB(A).**
- The BESS operation during the night-time is expected to e**xceed the NPI evening 35 dB(A) criterion at most receivers**, except receivers R10, R11, R24, R28, R29, R30 and R33. The night-time operational noise levels during neutral weather condition are predicted to exceed the night-time criterion **by up to 18 dB(A).**
- The night-time operational noise levels have been predicted to **exceed the sleep disturbance LAeq 40 dB(A) criterion** at residential receivers R01 to R09, R13, R16 and R20. The nighttime operational noise levels during neutral weather condition are predicted to **exceed the sleep disturbance criterion by up to 13 dB(A).**

* Noise enhancing weather conditions (adverse wind during day and evening, and temperature inversion during night-time):
- The BESS operation during the daytime is expected to **exceed the NPI daytime 40 dB(A) criterion at most surrounding receivers,** except receivers R10, R11, R24, R28, R29, R30 and R33. The daytime operational noise levels during noise enhancing weather condition are predicted to exceed the daytime criterion **by up (to) 17 dB(A).**
- The BESS operation during the evening is expected to exceed the NPI evening 39 dB(A) criterion **at most surrounding receivers**, except receivers R10, R11, R24, R28, R29, R30 and R33. The evening operational noise levels during noise enhancing weather condition are predicted to exceed the evening criterion **by up to 18 dB(A).** - The BESS operation during the night-time is expected to exceed the NPI evening 35 dB(A) criterion at most receivers, except receivers R10, R11, R24, R30 and R33. The night-time operational noise levels during noise enhancing weather condition are predicted to **exceed the night-time criterion by up to 22 dB(A).**
- The night-time operational noise levels have been predicted to **exceed the sleep disturbance** LAeq 40 dB(A) criterion **at most receivers**, except receivers R10, R11, R24, R28, R29, R30 and R33. The night-time operational noise levels during noise enhancing weather condition are predicted to exceed the sleep disturbance criterion **by up to 17 dB(A)**

Questions: How is it possible that the adjacent Tamworth BESS will exceed the noise criterion, during all hours of operation, 24 hours a day, but the Kingswood BESS will not?

Why must noise mitigation measures be employed if there is not unacceptable noise?

It is recommended to evaluate cumulative noise impacts further as part of the detailed design process when specific battery, inverter and transformer types are defined and more detailed information on all nearby developments is available.

Questions: Why are the the noise impacts and progression of the project being considered when we do not have the required specifications to make an informed judgement?

Why are only the 38 "receivers" (the dehumanising term for neighbouring homeowners and families) within a 1km radius only being included in the assessment when there are over 665 homes within a 2km radius?

Does the proponent assert that they will not be affected or are they being deliberately eliminated from calculations?

Community and stakeholder engagement
Engagement with stakeholders has been important for developing the Project. Stakeholders were identified as those that may be interested in, or who may be affected by, the Project and included government and technical stakeholders, landowners and the wider community.

Comment: As a landowner within 3km of this project I have not received any communication on the Project from the proponent. I am only aware of it after a community letterbox drop by people adjacent to the Project.

The effect of the traffic increase leading to further deterioration of local unsealed roads and the risk of a catastrophic fire event, assuming that the operational noise will not reach us, affect our everyday lives, the cost of insurance to protect our homes and livelihoods, and the safety and amenity of our home and local area.

We and most of the people of this area have not been consulted and have not been informed by the proponent.

Biodiversity
Construction of the Project would result in the removal of 0.16 hectares of native vegetation (PCT 3396). The areas of PCT 3396 forms part of the White Box- Yellow Box- Blakely's Red Gum Grassy Woodland and Derived Native Grassland…..Critically Endangered Ecological Community (CEEC) listed under the Biodiversity Conservation Act 2016.

Comment: The "two ecosystem credits to offset impacts on PCT 3396", essentially paying the Government to destroy critically endangered ecology, does not bring them back. Critically endangered is the only description that matters here.

Hazard and risk
Bushfire

From the EIS for the Tamworth BESS: There are also frequent dry lightning storms occurring throughout the area during the bushfire season (October to March) (TBFMC 2020). The TBFMC area has on <u>average 270 bush fires per year, of which 18 on average can be considered to be major fires.</u>

FRNSW - Advice on SEARs: There is currently <u>insufficient information available regarding the fire safety and emergency response management aspects of the project.</u> FRNSW notes the Scoping Report details a 500MW (1000 MWh) BESS. <u>It is the experience of FRNSW that BESS facilities present special problems of firefighting when responding to and managing an incident.</u> FRNSW requests to be consulted and given the opportunity to review the hazard and risk analysis and

provide comment regarding the proposed fire and life safety systems at the preliminary and final design phases of the project.

Comment: The Bushfire Assessment Report (App N) does not mention any aspect of the danger of lithium batteries – it does not mention the word lithium - indicated to present special problems in the FRNSW reply above, nor the occurrence of bushfires in the LGA, as documented in the Tamworth BESS EIS.

As such the Bushfire Assessment Report, that does not take into account the dangers of lithium batteries, can be considered basically useless.

Social and economic
Comment: The summary in the EIS (P19) does not mention the most worrying social impacts on the area. The neighbours of this project are concerned about noise, land values, insurance costs, traffic hazards and the deterioration of the non-sealed roads along with the risk of catastrophic bushfire.

The dismissive "we don't have research on that" in relation to land values is a poor cop out. To suggest that homes and property whose main feature is the lifestyle qualities of the property do not lose value when that quality of life is diminished or destroyed is disingenuous and not reality.

Water
Construction activities, if not managed properly, could result in increased mobilisation of soil and increased surface water runoff (e.g. sediment laden "dirty" water) into the downstream receiving waters.

During operation the key risks to surface water are associated with an increase in site runoff potential and stormwater pollutant load. This may lead to an increase in peak flow rates leaving the site and reduction in water quality in receiving watercourses.

Comment: The downstream water courses mentioned flow into the Peel river and Tamworth's water supply. Any threat of pollution from the operation of this facility must be shown to be removed before it is possible for it to go ahead.

It is not anticipated that the Project would intercept groundwater.

From the Tamworth BESS EIS: Water NSW records for groundwater bores (Water NSW 2021) show 81 bores located within 2 km of the project site.

Comment: The most important commodity is water. After surviving the long years of drought in this district, because of our bore, we understand how critical these resources are to the community. The issue of either toxic run off via drainage into Goonoo-Goonoo creek then to the Peel River, or aquifer interference of any kind must be shown to be eliminated.

There is no explanation of how the conclusion that the groundwater resources will not be affected was reached. The people that rely on the 81 bores within 2km of the project site, and those further afield, must be sure that their most critical resource will not be affected by this project.

2.5.4 Alternative technology

Table 2-4 Battery chemistry overview

Battery chemistry	Overview
Lithium-ion	Lithium-ion chemistries are diverse. Nickel-Manganese-Cobalt and Iron Phosphate formulations are commonly used within BESS facilities. These batteries are established in the marketplace and can be developed to comply with a range of Australian and international standards. This technology has been selected for the Project.
Lithium-ion polymer battery	This alternative is being investigated as certain formulations are quoted to achieve greater safety (e.g., reduction or elimination of thermal runaway), increased energy density, material stability within a greater operating envelope, and an enhancement in overall performance. This technology has not been selected for the Project.
Vanadium redox flow battery (flow battery)	This alternative is capable of long-duration discharge. It is quoted to achieve greater safety (e.g., reduction or elimination of thermal runaway), greater temperature operating envelope and longer operational design life. This technology has not been selected for the Project.
Sodium-ion battery	This alternative technology was considered given its environmental abundance, non-flammable nature, and reduced susceptibility to temperature changes relative to Lithium-ion batteries This technology has not been selected for the Project.

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Question: Why, given the technologies that reduce fire above, have the flammable lithium-ion batteries been selected for use on a bushfire prone site?

From the Tamworth BESS EIS: If the project were not an SSD, the following approvals may also have been required (see Section 4.41(b) of the EP&A Act):
• Bushfire safety authority - Section 100B, Rural Fires Act 1997.

Comment: as this project, due to its State Significant Development status also <u>not required</u> to gain approval from the Bushfire Safety Authority, this is of no reassurance to local residents. And its "status" is of no consequence in the event of a bushfire in this designated bushfire prone zone. The size of this project and its locality on the perimeter of a major regional centre is exactly why every precaution must be taken.

Science Direct article - Lithium ion battery energy storage systems (BESS) hazards
https://www.sciencedirect.com/science/article/abs/pii/S095042302200208X

According to recent lessons learned on BESS fire prevention and mitigation published by the Electrical Power Research Institute (EPRI) in June 2021, over 30 large-scale BESS globally experienced failures that resulted in destructive fires over the past four years (Long, 2021). These events are also tracked in the publicly accessible BESS Failure Event Database (EPRI, 2022). Most events had in common that the lithium ion batteries installed in the BESS where somehow driven to vent battery gas and transition to thermal runaway, which is a process that releases large amounts of energy. Thermal runaway is strongly associated with exothermic chemical reactions. Under a variety of scenarios (i.e., short circuit), the stored chemical energy is converted to thermal energy. The typical consequence is cell rupture and the release of large amounts of flammable and potentially toxic gases, which can lead to fire and explosion.

Comment: the local population who are aware of the dangers of lithium batteries and BESS installations already established worldwide are very tired of being gaslit when they suggest that these remote controlled industrial installations present a danger to the area.

Nobody is looking forward to a 40 degree plus summer day with a battery fire that even the fire authorities cannot put out.

The issue of no reticulated water on site is relative to the surrounds as a lithium battery fire cannot be put out with water.

4.3 Local environmental planning legislation

4.3.1 Tamworth Regional Local Environmental Plan 2010

Comment: If this industrial installation is "compatible" with the "RU Primary Production Small Lots" zoning the description is incorrect and misleading. That anything at all can be approved "with consent" suggests that there are no rules and no commitment to the rural nature of the surrounds whatsoever.

Consequence analysis

The hazard identification of the proposed BESS facility identified a set of scenarios requiring further assessment to determine the potential for off-site impacts. The analysed incidents were:

• Fire involving a battery enclosure (e.g. propagated thermal runaway resulting in a fully developed fire)

• Toxic gas generation from decomposition of battery electrolyte due to fire. B

• Toxic gas modelling involving the BESS module was undertaken using the Gexcon EFFECTS gas dispersion model that accounted for thermal rise (from the fire).

Comment: these hazards have been identified by the proponent, but any dangers will affect the local community and environment.

6.10.2.8 Groundwater
There are 41 groundwater bores located within a one kilometre radius of the Project Site. These are used predominantly for water supply and irrigation purposes. Standing water level data was available for five of the groundwater bores.

The reported water level ranged from four metres AHD to 27.6 metres AHD. Based on the location of the surface watercourses and Project Site topography, the inferred groundwater flow direction at the Project Site is considered likely to be towards the northeast. The aquifer is considered to be porous, extensive and of high productivity. There are two existing bores located within the Project Site along the eastern property boundary (Figure 6-19)

6.13 Cumulative impacts
6.13.2.2 Calala Battery Energy Storage System (SSD-52786213)
Equis Energy is proposing to develop a stand-alone BESS (300 MW / 1200 MWh) at 57 Burgess Lane, Calala NSW, approximately 530 metres north of the Project. The proposal also includes the

installation of underground transmission lines connecting to Tamworth substation and ancillary works.

6.13.2.3 Tamworth Battery Energy Storage System (SSD-23830229)
Valent Energy is seeking to develop a BESS (200 MW / 400 MWh) at 696 Burgmanns Lane, Tamworth NSW, located directly west and adjacent to the Project Site. Installation of a new underground or overhead transmission line connecting the proposed substation to the existing Tamworth substation is included in the proposal. Approval for this proposal is being sought as SSD under Part 4 of the EP&A Act. A scoping report for the proposal was lodged in July 2021 and the SEARs were issued on 1 September 2021 and was used to inform the potential for cumulative impacts. The Tamworth BESS recently submitted the EIS for exhibition in May 2024.

Traffic and transport
During construction, Tamworth BESS is estimated to generate 40 light vehicle, five heavy vehicle per day. An estimated eight OSOM vehicle return trips are anticipated.

Tamworth BESS EIS: An anticipated peak demand of up to **170 daily movements** is expected during Stage 2 and Stage 3, with 140 being OSOM.

Comment: Tamworth BESS EIS figures are now available and are much higher than the SEARS figures quoted above. The correct updated figures must be used to gain a true cumulative impacts figure.

6.13.2.4 Lambruk Solar Factory (SSD-67436209)
Venn Energy Pty Ltd is proposing to develop the Lambruk Solar Project, approximately 15 kilometres south of Tamworth, NSW. The Project would include photovoltaic (PV) solar arrays, a substation, a switchyard, a BESS, internal access tracks, an office and amenities building(s) and onsite transmission lines. Approval for this proposal is being sought as SSD under Part 4 of the EP&A Act. A scoping report for the proposal was lodged in February 2024 and the SEARs were issued on 29 February 2024.

Comment: As we are positioned between the Tamworth and Kingswood BESS and the Lambruk Solar project, we very much feel like the meat in the (non) renewable sandwich watching the quality of our and our children's lives and the value of our largest investment disappear on the alter of the war against plant food.

As another local resident has said "you are stealing from us", and these overseas developers and the Government that is enabling this theft are complicit in industrialising our farmland on a large scale, Australia wide. This theft and the resulting effects on our environment and food security is not being reported to those in the city.

6.13.3.2 Noise and vibration
All BESS projects in the area are at the planning stage and the equipment selection and layouts are not finalised. Therefore, it is currently not feasible to offer comprehensive predictions on the cumulative impact.

Comment/correction/question: This out of date statement is of no comfort at all to the neighbours. How and when will the true cumulative effect be known? This appears to be a loophole to assure approval without due consideration of the cumulative effects of the three BESS projects in and adjacent to Calala, and the Lambruk Solar project, also containing a BESS battery.

7.8 Project impacts
Hazards and risk
Hazards and risks associated with the project are not predicted to be significant. Risks have been assessed through a PHA and bushfire assessment. The PHA and bushfire assessment included an assessment of all potential hazards and risks including but not limited to bushfires, spontaneous ignition, and electromagnetic fields. The PHA and bushfire assessment concluded there no significant off-site impacts predicted from the operation of the project.

Comment: The Bushfire Assessment did not even take into consideration the presence of 184 industrial sized lithium batteries at the site.

Appendix C Mitigation measures

Comment: This section goes for over six pages, a large amount of mitigation is required to attempt to meet allowable parameters.

Question: What guarantees are there that any or all of these mitigation measures will be employed and will work to mitigate the effects of this development?

Conclusion

Based on the out of date information and factual errors around the traffic-related impacts along with the omission of including the impact of lithium batteries in the Bushfire Assessment, and the lack of information on the obvious cumulative effects of the three proposals within a 1km radius, the Environmental Impact Statement for the Kingswood BESS is flawed.

The local community assumes that this document must be corrected before the project is allowed any further consideration.

There is no doubt that this project will impact on surrounding homes and lower the livability and safety of this rural area.

All other issues may well be eclipsed by the bushfire risk, and as per the FRNSW direction the Fire Safety Study must be conducted before this project progresses, not as an afterthought.

As a local resident with a family that works and goes to school in this area I am firmly against this project. The developers are stealing safety, lifestyle and financial security from the local community to improve the bottom line of their multinational businesses.

Yours faithfully,

Mrs Karen Fox.
689 Ascot-Calala Rd.
CALALA 2340.