

File ref: **SSD-63345458**

5 June 2025

Dear Sir/Madam

RE: SUBJECT WATTLE CREEK BESS PROJECT SSD-63345458
1001 Canyonleigh Road,

I wish to make a submission to the proposed Project which includes:

- a large-scale solar photovoltaic (PV) generation facility (Approximately 490,000 PV modules - 265 MW AC) with a maximum height of 5m;
- with an associated 100 MW /200 MWh capacity battery energy storage system (BESS);
- related additional infrastructure including on-site collector substation to connect the Project to the electricity transmission network via the Transgrid Marulan Substation;
- operation and maintenance facility – including a site office, O&M buildings, amenities, equipment sheds, storage, and parking areas - 8,000m² in area;
- an 80 m communication mast at the collector substation location;
- 2 overhead transmission line options to connect to the transmission network,
- internal electrical reticulation network consisting of a combination of underground cables and overhead powerlines, hardstands, new access tracks, resurfacing to existing access tracks, minor upgrade to the existing access point from Canyonleigh Road, and static water tanks
- research test bed – 8,094m² (2 ac)

A summary of the reasons I am concerned with the project are provided below

Potential cumulative impact

1. A negative change to the character and amenity of the area, landscape and visual

The current character of the area is formed from the objectives of the landuse zone and land use table under the former and current Upper Lachlan LEP and Goulburn Mulwaree LEP. This has resulted in rural dwellings and development on lots ranging from 10ha (known as concessional allotments) to 40 ha allotments permitted under the former Mulwaree LEP and 100ha allotments permitted under the current LEPs.

The current accumulation of Projects proposed in this locality (as indicated in the attached Figures 1- 4) and this project are proposed to cover individual areas with industrial infrastructure ranging in areas of between 12ha (Canyonleigh BESS) to 580ha (Wattle Creek Solar Farm) to highlight how significant and adverse the cumulative impact will be on the locality, both on the landscape as well as the amenity and lifestyle. The developments themselves are larger than many of the existing parcels of land and out of character with the Council desired character permitted under the current LEP zonings. It should be considered practical and reasonable under the current Rural Landscape zone for landowners in the vicinity to expect a peaceful and rural setting characteristic of rural land uses and dwellings (permitted with consent) not a landscape characteristic of an major energy industrial hub landscape which will dominate the landscape.

The current and existing proposals in the immediate locality consist of:

- the nearby existing Transgrid Marulan Substation with capacity of 480MVA, refer to Figure 1 attached;

- Existing 330kV and 132kV transmission lines
- 117ha for the approved Marulan Gas Fired Power Station consisting of up to 4 x 40m high exhaust stacks rising out of 2 power stations - either 250-350mw open cycle gas-fires power station for peak electricity generation (stage 1) or a 400-450 mw combined cycle gas-fired power station for immediate/base load electricity generation (07_0174 - 07_0716) with consent modified 16/10/2024, refer to Figure 2 & 3 for reference;
- 13ha for the proposed Canyonleigh BESS Project – estimated 300MW/1,200MWh storage capacity;
- 580ha for the Wattle Creek large-scale solar photovoltaic (PV) generation facility (265 MW AC)
- 75ha for the Wattle Creek proposed Battery Energy Storage System (BESS)

“Summer Hill” is a considerable landholding with an area of approximately 770ha (1900 acres) held over approximately 39 separate titles which has been in the family for many generations. It was ideally located adjoining or close to number of other large holdings for many years and has contributed to the area positively through supporting the local RFS, local schools and businesses. Other areas of the state should help bare the burden of energy projects not be subject to a few. This can be seen in both the Goulburn Mulwaree and Upper Lachlan communities recent objection to the proliferation of energy developments and having already shared a large burden already. The Goulburn Mulwaree DCP “plan aims to protect the scenic values of the rural landscape and environment and encouraging development to be unobtrusive and sympathetic to the surrounding rural setting. Where practicable, existing vegetation is to be maintained and enhanced, so as to provide buffers and landscaped visual relief within rural areas.” While it is noted that SSD does not have to take into consideration the DCP general planning matter require the consideration of the existing and proposed character. The development does not fully address how the development can proceed without negatively impacting on the character of the adjoining area located within the Goulburn Mulwaree LGA.

Did the development address the potential for radiant heat and the cumulative impact given the scale and nature of the proposed development and adjoining approved development. This can potentially have a negative impact on the climatic conditions creating a drier sub-climate.

2. Potential Land Use Conflict

The LUCRA does not take into consideration potential conflicts resulting from:

- Windblown litter and potential stock ingestion and the potential veterinary service costs associated with sick stock.
- Delay in transporting stock and products and the potential associated stress on stock, hazards and extreme temperatures.
- Windblown dust which can make grass and feed unpalatable, thereby reducing the capacity of surrounding land for fodder. It is recognised that rural dwelling setback requirements under Council DCPs are often 50m due to the dust associated with rural roads.
- Potential for weeds to be blown onto surrounding farming land given that much of the wind direction comes from the westerly direction. The EIS states as a mitigating impact the control of priority weeds, however weed control Regional and State Priority Weeds as identified and listed in the *South East Regional Weeds Glovebox Guide NSW* as produced by Department of Primary Industries and watch for the introduction and control of Prohibited Matter as also identified by Department of Primary Industries. Landscaping around the property boundary would be recommended to minimise impacts on views and vistas and help mitigate transportation of weed and dust onto surrounding properties.
- Maintenance of boundary fences should be the responsibility of the developer due to the risk of stock loss and hazards.

- We have become recently advised from Local Lands Service restrictions that there are risks associated with stock grazing adjacent to windfarms as a result of micro-plastics from wind turbine blades. What is to say that emissions from the development will not have a similar effect?
- The noise generated during clearing will be significant on neighbouring properties, rural farming practices and stock.
- It is only reasonable that adjoining landowners are made aware of any changes to water quality that may impact their landuse, and environment.
- All buffer distanced must be located within the subject land and not limit or reduce the development potential of Summer Hill land holding

Management of pest and weeds should be undertaken in consultation with LLS, Councils and adjoining landowners with emphasis on protecting farming viability and nil or negligible impacts.

3. Bushfire Risk and Environmental Hazards

The Bush fire assessment history does not take into consideration the area had been severely burnt as a result of the March 1965 fires which travelled from Chatsbury/Taralga to the north through to Bungonia, Tallong and Wingello in the south and eventually stopped or burnt out near Nowra on the South Coast and covered an area of approximately 250,000ha. We are extremely concerned with the lack of detail and assessment with regards to fire protection and prevention because the use of machinery over a dry paddock can be enough to start a fire in summer. A \$0.5 Billion project should heavily assess such potential impacts rather than a simple assessment against the Planning for Bushfire Protection Guide. A significant industrial development should identify all the potential construction and operational risks of this scale and not rely on the support of local volunteers from the RFS which have no facilities in the vicinity of the development. The closest stations are too far away (Canyonleigh the other side of Paddy's River which is a steep and narrow decline and incline, Big Hill, Towrang, Marulan and Tallong/Wingello) to ensure an early protection and whether specialist equipment would be required due to the potential hazards and smoke from the industrial fires. Would these stations be adequately equipped to control a fire from the facility?

It is recommended that a special purpose-built firefighting facility (shed and equipment) should be constructed on site due to the isolation of the site. Family had recently made the community aware of a fire at the Transgrid substation when an explosion/fire started and had he not been present locally the fire could have been more significant.

The additional hazard of batteries in the locality is also a concern as information is publicly available on the internet of 3000 lithium battery storage warehouse in Melbourne which exploded in Jan 2025 with potentially hazardous chemicals including hydrogen fluoride gas and heavy metals (such as nickel aluminium copper, manganese and cobalt) in the smoke which don't disappear but settle on surfaces and potentially contaminate land, vegetation and water.

It is also noted from a simple web search that state-of-the-art safety protocols failed at the Moss Landing Lithium-ion Battery Plant adjacent to the Power Plant in Monterey County USA, where there was an explosion of one of the world's largest battery storage establishments. The community are demanding that there must be more accountability concerning fires as the flames were 30 ft high and there has been 4 fires since 2019.

It is questionable as to whether the site is suitable or the proposed development is suitably designed to adequately address the potential hazards including and not limited to fires due to the isolation of the location, the scale and nature of the development

and lack of resources or infrastructure proposed to protect the development from significant fires and hazards.

Upper Lachlan Bushfire mapping was prepared around 2008 and is currently being reviewed by NSW RFS and Council. A report has been prepared for the June 2025 Council Meeting. The mapping does not currently take into consideration grasslands amongst other matters and this needs to be highlighted as an inadequacy. Many of the hazards are not fully understood or captured under the current hazard assessment, therefore a precautionary principle should be applied

4. Noise and Vibration

The noise assessment modelling has not taken into consideration the local climatic conditions of the site including, topography, wind direction and speed and the impact of temperature inversions rather than mild modelled assumptions. Such a large-scale development should use more extensive modelling to determine a more realistic impact on the neighbours and locality. It is requested that the development be remodelled to determine a more accurate indication of the proposed development, together with the potential cumulative impacts from the approved and potential developments.

It appears the noise assessment did not include the potential impacts as a result of the proposed on-site concrete batching plant, borrow pits and rock crushing facilities (as mentioned on page 37 of the EIS) as these words did not appear in Appendix 6. If these critical elements appear to have been omitted there is the potential for further elements to have been omitted and the noise assessment unclear and inadequate.

5. Traffic Noise, Disruption and Safety

Similar to the details above, the Noise Assessment modelling appears to lack detail required for such a large scale development and it is requested that further and more detailed modelling be undertaken to ensure the proposed impacts can be fully and accurately assessed.

Summer Hill house (R003) is located approximately only 500m from the access point into the Project site off Canyonleigh Road. Vehicular access to the development will be frequent and therefore the noise source frequent and appear to not have been assessed. The Noise Assessment identifies the closest aspect of the development infrastructure as less than 2km but omits the access location as a significant contributor. Again, it is requested that further and more detailed modelling be undertaken to ensure the proposed impacts can be fully and accurately assessed.

Access Safety

It is noted that the Gas Fired Power Station was required to upgrade the access in accordance with the following extract.

Prior to the commencement of construction, the Proponent shall level, grade and apply a single coat seal onto the portion of Canyonleigh Road between the Brayton Road intersection and the Power Station Site access, unless those works have previously been completed

It is contended that safety is a critical matter with the proposed increase in traffic by over 2000%. If the road upgrade was considered a requirement under the prior development, it should be argued that a similar requirement be applied to this development. What \$500 million dollar project relies on access over an unsealed road that is subject to inundation during period of heavy inundation?

6. Water Supply

It would be expected to be reasonable and feasible for a large project like this to have detailed the source and impacts as a result of the development. At the moment the

details are unclear as to how they will be sources and if the traffic movements includes the water supply. The local community does not want to be adversely impacts by significant water extraction from the locality either by a water licence or ground water licence, given the already approved gas power plant water requirements.

7. Weed Management

Refer above to LUCRA comments.

8. Potential loss in Property Value

The potential negative impact from the loss of value of the property could potentially cripple the value of the land. The land is made up of numerous allotments which have the potentially to be developed. While this is not the intention of a multi-generational farm, we should not be adversely affected by the change in character and from the realisation that land adjoining drainagelines and water courses current eagerly sought after, which has a mix of native vegetation stands and improved pastures and largely a northerly aspect is potentially severely devalued.

The NSW Government introduced legislation to allow farms to undertake agritourism and farm stay accommodation with elements as exempt and complying development. Having an Industrial Energy Hub concentrated on the boundaries of the locality severely constrains future opportunities available on the land.

The test bed is a large concern potentially a principle concern as the test bed is located over the hill and on an allotment that has dwelling permissibility, northerly aspect ideal for a dwelling site which will look directly out to the test bed. Furthermore the technology is unknown, potential for contamination, fire and the like.

While this is a summary of the family concerns regarding the proposed development, it does not include potential concerns with regards to the biodiversity of the area. We have taken family from overseas to see Platypus in the Wollondilly River and are well aware of the diversity of wildlife including many bats, possums, birds and insects included in the recent surveys. It is a concern that these will also be negatively impacted.

The proposed development completely changes the amenity of the environment from rural to industrial with the total area for the BESS identified in the EIS documentation as 79 ha, being 80% of the current minimum lot size permissible for dwellings i.e 100ha.

Compliance

Should there be non-compliance with any of the conditions of consent, details as to the non-compliance and measures to mitigate and manage should be made available to direct neighbours.

Should complaints be received during the construction and operation of the development it is requested that a satisfactory outcome be reported back to the submitter as part of the proposed complaints hotline mitigating measure.

Should the developer propose not to decommission the site, a modification of the application must be required so that the community have to opportunity to object /provide comment.

Please take our concerns into serious consideration given the proximity of the development to our family property which we have managed and protected over many generations.

It is requested that we be given the opportunity to view and respond to the response to submissions due to the severity of the issues raised in this submission.

Please feel free to contact me should you wish to discuss this submission further.

Yours sincerely

Dianne James
&
Noeleen Sieler

Figure 1: Existing Marulan Transgrid Substation

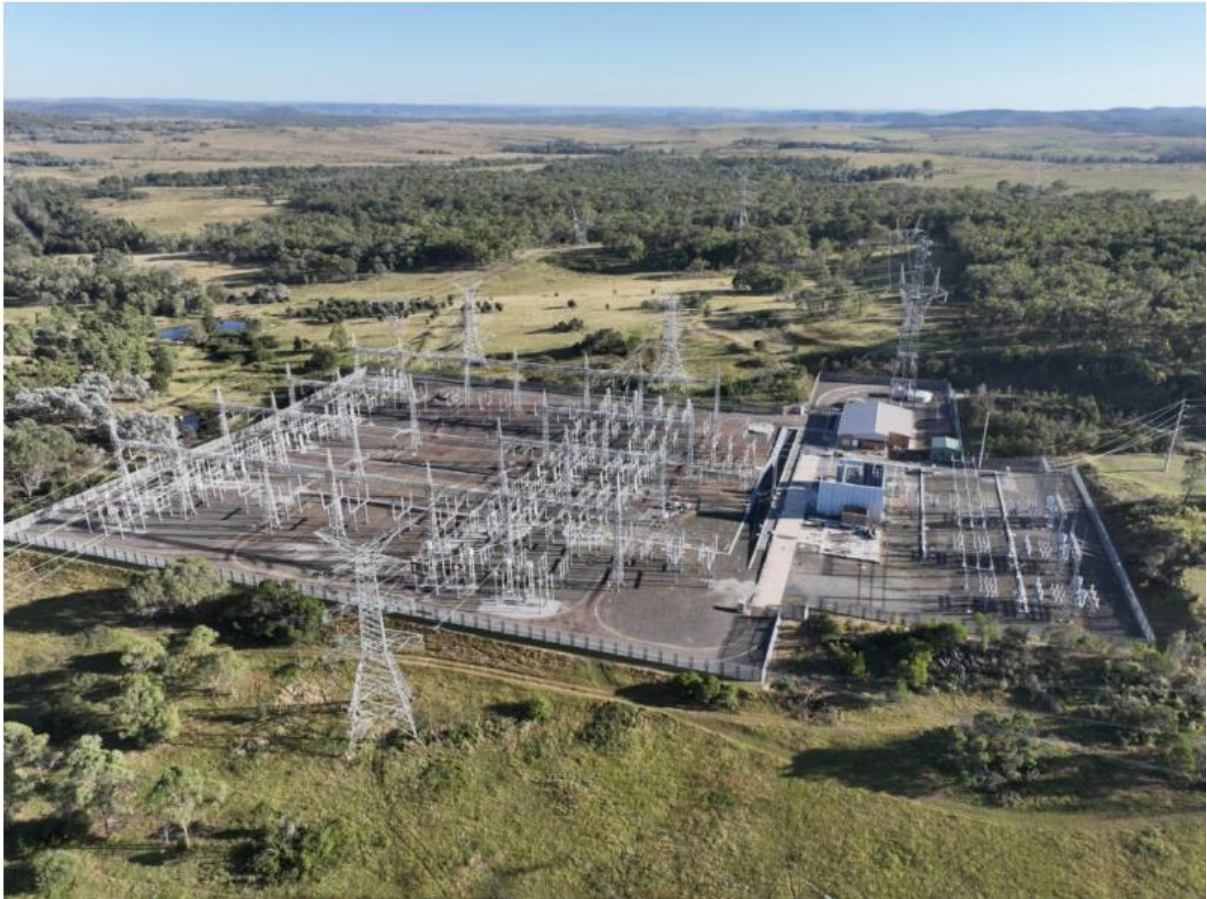
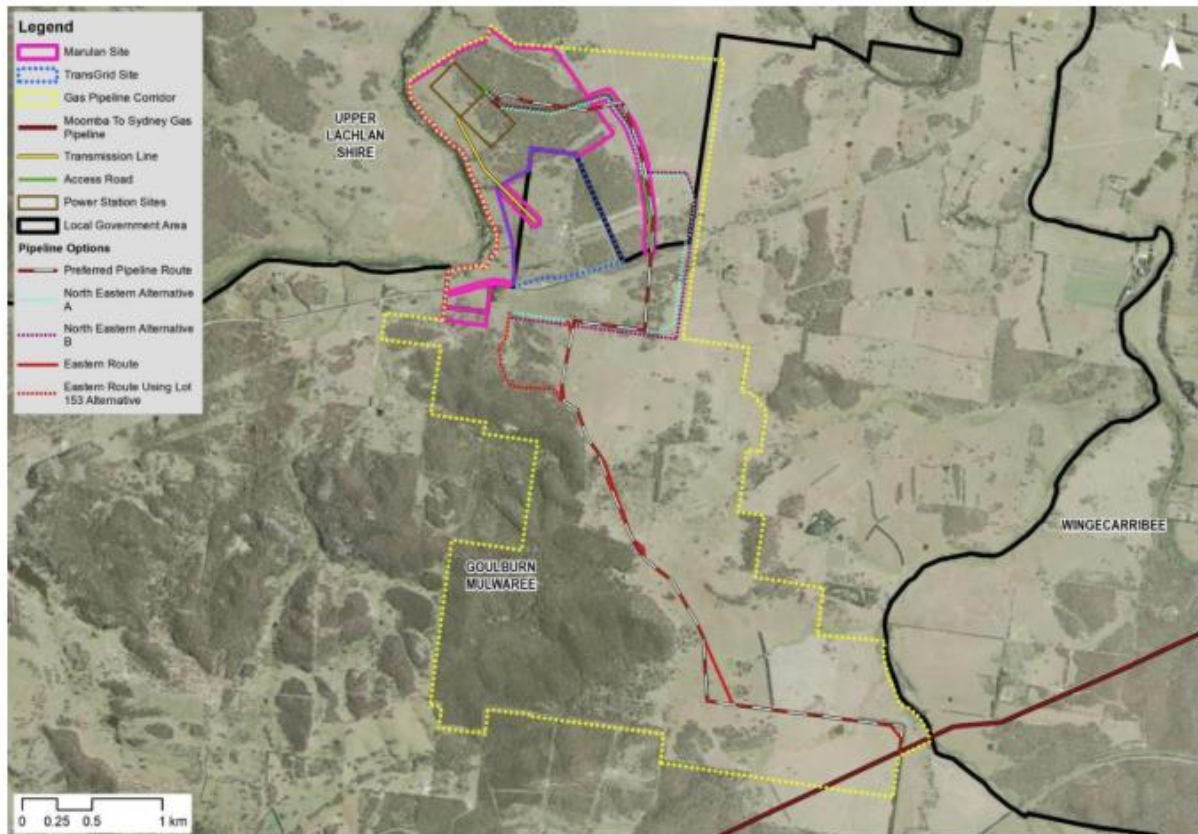


Figure 2: Energy Australia – Gas Fired Power Plant - footprint



An overhead map of the site. Photo: Energy Australia.

Figure 3: Concept picture of existing Energy Australia Gas Power Plant - Tallawarra



Energy Australia also runs the 440 MW Tallawarra A gas-fired power station at Lake Illawarra in Yallah, NSW. Photo: Energy Australia.

Figure4:

Proposed Canyonleigh BESS – opposite Marulan Substation – Location of 1054 Canyonleigh Road inserted for reference

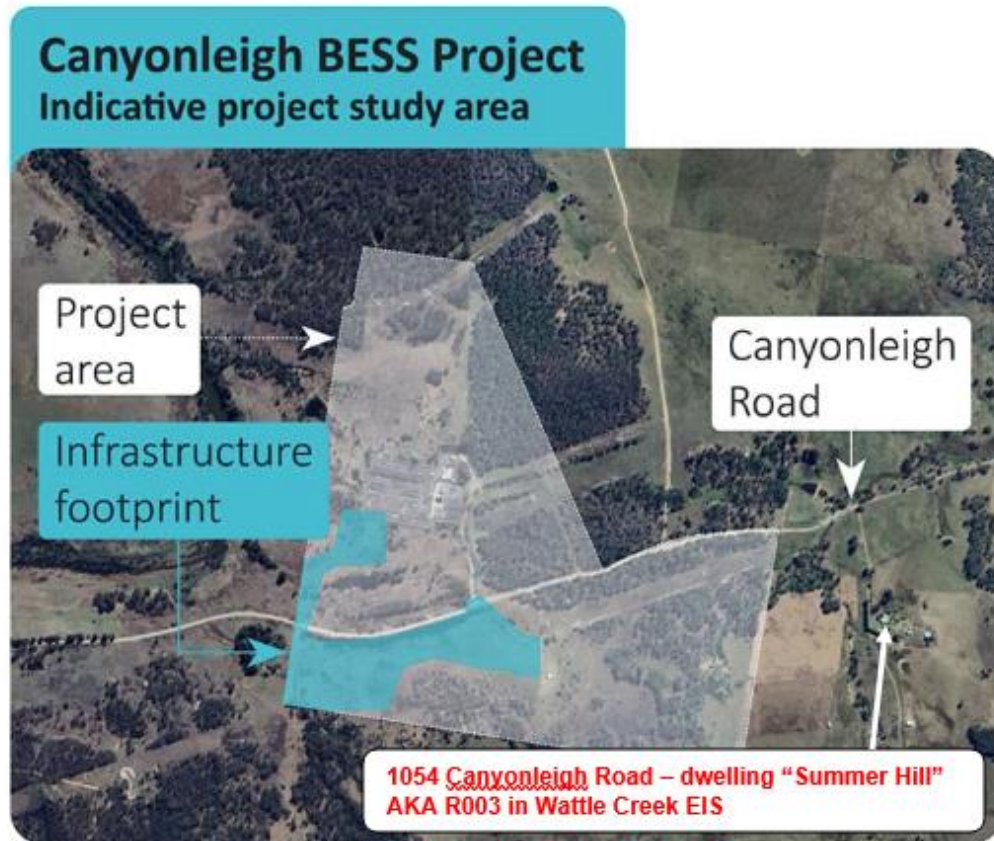


Figure 5: 1054 Canyonleigh Road, Brayton – Landholding

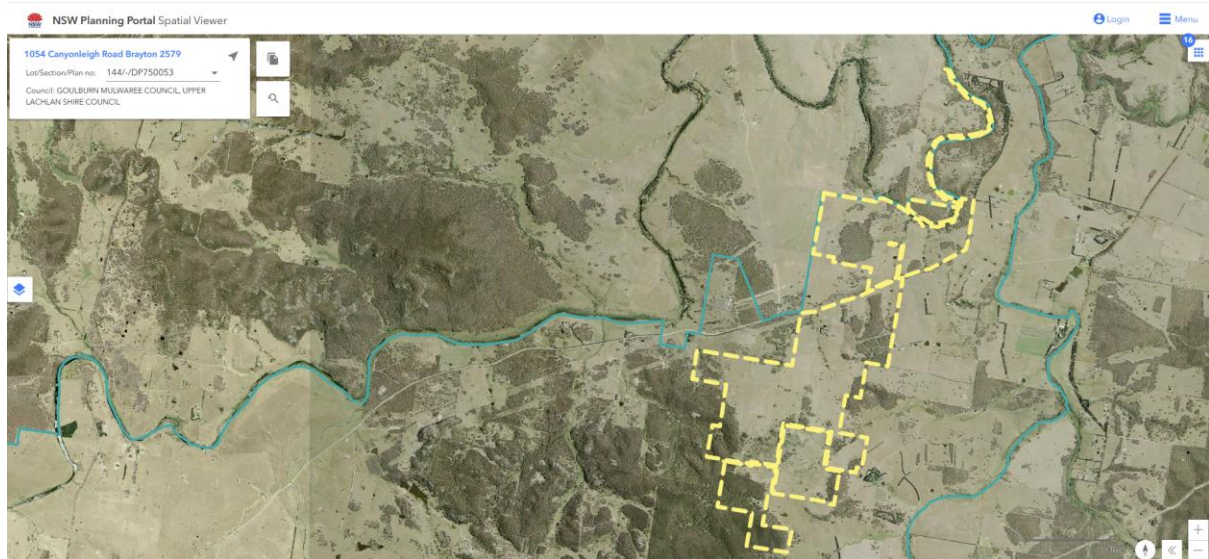


Figure 6: 1051 Canyonleigh Road, Brayton – Landholding

