

17 December 2025

Department of Planning and Environment

Locked Bag 5022
Parramatta NSW 2124

Dear Pragya

RE: MANGOPLAH BATTERY ENERGY STORAGE SYSTEM (SSD-77527735)

Wagga Wagga City Council (Council) provides the following submission in relation to the Environmental Impact Statement (EIS) for the Mangoplah Battery Energy Storage System (the Project).

Council previously provided advice on the draft Secretary's Environmental Assessment Requirements (SEARs) by correspondence dated 20 November 2024. This submission should be read in conjunction with that advice and reflects Council's review of the exhibited EIS and supporting technical documentation.

Council acknowledges the breadth and quality of the technical studies undertaken in support of the Project. The comments below focus on matters of importance to Council and the local community that warrant further consideration and where appropriate, strengthening through conditions of consent.

Lifecycle responsibility and decommissioning

Council notes that the EIS addresses the construction, operation and decommissioning phases of the Project and includes commitments to remove infrastructure and rehabilitate the site at the end of its operational life.

Council remains concerned, however, that decommissioning and rehabilitation measures are largely described at a conceptual level and are reliant on future plans. Given the long operational lifespan of the Project and its location within a rural agricultural setting, Council considers it important that long-term responsibilities are clearly defined and secured.

Council requests that consideration be given to conditions requiring:

Preparation and approval of a Decommissioning and Site Rehabilitation Plan prior to commencement of operation; and appropriate financial assurance mechanisms to ensure rehabilitation obligations are met and do not create future liabilities for landholders or the broader community.

Flooding and flood evacuation access

Council acknowledges the flood modelling and assessment contained within the EIS and notes the conclusion that the Project is not expected to materially alter flood behaviour across the site.

Council also notes that site access may be affected during flood events. While procedural mitigation measures are proposed, Council considers it important that emergency access and operational resilience are clearly addressed.

Council notes that the Flood Impact Assessment identifies alternative evacuation routes, including “Route B”, as part of the proposed emergency access and evacuation arrangements.

Sections of Route B do not comprise a continuous public road corridor and include land that is privately owned. Council understands that portions of this route were closed and transferred to private ownership in or around 2015.

In this context, Council considers that reliance on Route B as an emergency access or evacuation route requires further clarification. Council recommends that the Department ensure that:

- any emergency access or evacuation routes relied upon for the Project are demonstrably available for that purpose for the life of the development;
- appropriate landowner consent or legal access arrangements are secured where routes traverse private land; and
- emergency access arrangements do not rely on routes that cannot be guaranteed during flood events or other emergencies.

Council considers this clarification essential to ensure the robustness of the Project’s emergency management arrangements and to avoid reliance on access routes that may not be available when most needed.

Fire safety and emergency response

Council notes that community members have expressed concern regarding fire risk associated with battery energy storage systems, including the potential for thermal runaway events, fire intensity, smoke and gas emissions and the capacity for emergency responders to safely and effectively manage such incidents in a rural setting.

Council acknowledges that specialist fire risk assessments have been undertaken as part of the EIS and that responsibility for emergency response ultimately rests with relevant authorities. However, Council considers it appropriate to highlight the importance of robust, site-specific fire prevention and response arrangements given the location of the Project, reliance on emergency access routes and the potential consequences of a fire incident.

Council recommends that the Department ensure that conditions of consent require:

- confirmation that fire suppression systems, fire water supply and on-site infrastructure are adequate and consistent with the requirements of Fire and Rescue NSW and the NSW Rural Fire Service;
- preparation and implementation of a Fire and Emergency Management Plan, developed in consultation with relevant emergency services, addressing prevention, detection, response, communication protocols and responsibilities;
- clear arrangements to ensure that emergency response capability is not dependent on remote monitoring alone and that response timeframes are appropriate to the risk profile of the facility; and
- ongoing vegetation and fuel load management within and adjoining the site to minimise fire risk to surrounding agricultural land.

Council considers that these matters are critical to community confidence and to ensuring that fire risks associated with the Project are appropriately managed over its operational life.

Traffic, haulage and road impacts

Council notes the findings of the Traffic Impact Assessment, including the projected construction workforce, associated traffic volumes and reliance on Holbrook Road for site access.

Council accepts the assessment's conclusion that the surrounding road network can accommodate Project traffic, subject to appropriate management. Council requests that conditions be considered requiring:

- a Construction Traffic Management Plan to be approved by Council prior to the commencement of works;
- pre- and post-construction road condition dilapidation surveys for affected roads; and
- clear arrangements for rectification of any construction-related road damage.

Social impacts, accommodation and cumulative pressures

Council acknowledges the Social Impact Assessment as a thorough and transparent assessment that recognises strong community concern, cumulative development pressures within the region and potential impacts on housing and accommodation during construction.

Council notes that a number of key mitigation measures, including an Accommodation and Employment Strategy, are proposed but deferred.

Given the scale of concurrent infrastructure and renewable energy projects occurring across the region, Council considers it important that accommodation impacts are addressed proactively.

Council recommends that conditions be considered requiring:

- preparation of an Accommodation and Employment Strategy prior to construction, in consultation with Council;
- measures to minimise pressure on local housing and visitor accommodation; and
- ongoing monitoring and reporting of workforce accommodation arrangements.

Agricultural land and soil capability considerations

Council notes that another key issue raised by the local community relates to the loss of productive agricultural land associated with the Project.

The EIS includes soil and land capability assessments that classify the Project site under the NSW Land and Soil Capability framework. Council acknowledges that land capability classification is a technical matter informed by biophysical characteristics such as soil properties, slope, drainage and erosion risk.

Council considers it appropriate to raise the following matters for the Department's consideration:

- The land is zoned RU1 Primary Production and is currently, and historically, used for cropping and grazing;
- community members, including local landholders with long-standing experience of the land, have expressed strong concern regarding the loss of productive agricultural land; and
- there is a perception within the community that the agricultural value of the land may not be fully reflected in the assessment outcomes.

Council is not seeking to substitute its own judgement for that of technical specialists. However, Council considers that where community confidence in land capability outcomes is low, it is important that the assessment process is demonstrably robust and that the long-term implications for agricultural land use are carefully weighed.

Council therefore requests that the Department:

- carefully consider agricultural productivity and land use outcomes alongside land capability classifications; and
- ensure that, should the Project be approved, conditions require full site rehabilitation and return to agricultural use to the greatest extent practicable at the end of the Project's life.

Community engagement

Council acknowledges the community engagement undertaken by the proponent and documented in the EIS and supporting appendices. Council also notes that, despite this engagement, significant community concern and opposition remains, particularly from residents in close proximity to the Project site.

Council considers that continued, transparent and responsive engagement during construction and operation will be critical to managing impacts and maintaining community confidence.

Council recommends that conditions be considered requiring:

- implementation of a Community Engagement Plan for the duration of construction and operation;
- clear complaint handling procedures, response timeframes and escalation pathways; and
- engagement that extends beyond immediately adjoining landholders to include the broader Mangoplah community.

Community benefit sharing

Council notes that the EIS identifies the potential for community benefit-sharing arrangements to be established in association with the Project. Council also notes that community feedback reflects a degree of scepticism regarding the purpose, scale and delivery of proposed benefits and a concern that benefit-sharing arrangements may be conflated with consultation activities or the mitigation of project impacts.

Council considers that community benefit sharing is distinct from both community engagement and impact mitigation and should be approached as a transparent, structured mechanism to deliver enduring public benefits to the host community.

Council has prepared a draft Community Benefit Sharing Policy for Large-Scale Energy Projects, which, while not yet adopted, reflects Council's emerging policy position and is aligned with the NSW Benefit Sharing Guideline (November 2024). The draft policy has been developed to provide consistency and transparency in negotiations with proponents and to ensure that community benefits are directed to public purposes and deliver long-term value.

Council notes that the Project is not located within a designated Renewable Energy Zone. While Council does not seek to pre-empt the strategic planning merits of the proposal, it considers that the location of large-scale energy infrastructure outside designated strategic areas heightens the importance of clear, transparent and well-governed community benefit-sharing arrangements.

In this context, Council considers it appropriate that any community benefit-sharing arrangements associated with the Project:

- are clearly defined and documented, including governance, decision-making and reporting arrangements;
- are delivered through a formal mechanism, such as a Voluntary Planning Agreement, consistent with the Environmental Planning and Assessment Act 1979 and relevant NSW guidance;
- are directed to public purposes that deliver enduring and meaningful community benefit;
- are separate from and in addition to, any works or contributions required to mitigate project impacts or satisfy conditions of consent; and
- are structured to operate for the full operational life of the Project, rather than being limited to a fixed or nominal term.

Council also considers that early engagement between the proponent and Council regarding the structure and governance of any proposed community benefit-sharing arrangements would assist in improving transparency, consistency and community confidence.

Council emphasises that effective community benefit sharing may assist in addressing cumulative impacts associated with multiple large-scale projects within the region, but should not be relied upon as a substitute for appropriate site selection, impact avoidance or mitigation.

Conclusion

Council considers that the EIS and supporting documentation provide a comprehensive assessment of the Project and address many of the matters raised through the SEARs process. However, Council maintains that a number of issues would benefit from further consideration and stronger conditioning to ensure impacts are appropriately managed and that long-term risks are not transferred to the community.

Council looks forward to continued engagement with the Department as the assessment progresses.

Should you require any further information or clarification, please do not hesitate to contact Council.

Regards,



Scott Gray
Chief Operating Officer