

Subject: **Objection to the Mangoplah Battery Energy Storage System – SSD-77527735.**

Because of the ***Inappropriate use of RU1 land being used for a hazardous and offensive development in a bush fire prone area.***

I am writing to formally express my objection to the Mangoplah Battery Energy Storage System (BESS) project proposed by Samsung C & T Renewable Energy Australia (SREA) Pty. Ltd., to be located within the property on 4178 Holbrook Road, Mangoplah. Because of the ***Inappropriate use of RU1 land being used for a hazardous and offensive development in a bush fire prone area.***

The site is within close vicinity to the village of Mangoplah and is surrounded by agricultural and grazing land – to me it is not a place to build such a project.

The Mangoplah Environmental Impact Statement states that “The Project Site is zoned Primary Production (RU1) under the *Wagga Wagga Local Environmental Plan 2010* (Wagga Wagga LEP). The objectives of the zone are:

- To encourage sustainable primary industry production by maintaining and enhancing the natural resource base
- To encourage diversity in primary industry enterprises and systems appropriate for the area
- To minimise the fragmentation and alienation of resource lands
- To minimise conflict between land use within this zone and land uses within adjoining zones
- To foster strong, sustainable rural community lifestyles
- To maintain the rural landscape character of the land...”(p.23, 2025).

In addition, Samsung C&T Renewable Energy Australia (SREA) Pty. Limited, state in the Scope Report that “the Project Site has been selected with the goal of balancing the assessed social, environmental and economic aspects associated with the development of a BESS” (p. 21), this situation may be appropriate in other zones, such as a Renewable Energy Zone (REZ), REZ zones are specifically designed to accommodate renewable energy infrastructure, including storage facilities like batteries and substations. The NSW Government states that they ensure that development occurs in these designated areas. The area in which the proposed Mangoplah BESS project will be located, is not in a REZ zone, it is a RU1 area, which is Primary Production zoning, which aims to encourage sustainable agricultural production and protect natural resources.

Furthermore, the Scope Report also states that “the proposal aligns closely with two planning principles for the Wagga Wagga City Council (WWCC). These include

. Principle 1: The environment – Protect and enhance natural areas and corridors. The project aims to balance the natural environment and development through minimising impact on terrestrial biodiversity within the project site and surrounding areas.

. Principle 2: The environment – increase resilience to natural hazards and land constraints” (p.18, Samsung C&T Renewable Energy Australia (SREA) Pty. Limited).

Moreover, the aims of the NSW State Environmental Planning Policy (Primary Production) 2021

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- (a) to facilitate the orderly economic use and development of lands for primary production.
- (b) to reduce land use conflict and sterilisation of rural land by balancing primary production...

- (c) to identify State significant agricultural land for the purpose of ensuring the ongoing viability of agriculture on that land, having regard to social, economic and environmental considerations.
- (d) to encourage sustainable agriculture...”(2025).

Adding to this inappropriate location, the site of the proposed Mangoplah BESS project is within close vicinity to the village of Mangoplah and is surrounded by agricultural and grazing land and is classified as being in a ‘High Fire Prone Area’, according to the NSW Rural Fire Service, in addition the area around the proposed Mangoplah BESS project site is classified as being Category 1 and 3 vegetation, as stated by Ember Consulting Pty. Ltd. (p.19, Bushfire Assessment Report, 2025), with “Vegetation Category 1 is considered to be the highest risk for bushfires...” and “Vegetation Category 3 is regarded as a medium vegetation...” (p.19, Bushfire Assessment Report, 2025), which according to the NSW Rural Fire Service requires a buffer zone of 30 metres, whereas the Mangoplah BESS Bushfire Assessment Report states that there will be an Asset Protection Zone of only 11 metres. As stated by Australian Bushfire Protection Planners Pty. Limited, “The BESS proposal is classified as ‘industrial’ development and...therefore, the default position for providing protection for ‘industrial’ development located in a bushfire prone area is to provide a defensible space (Asset Protection Zone) wide enough to prevent flame contact on the structure, or in the case of the BESS, the cabinets housing the battery packs and the electrical equipment in the Substation” (p.24, Bushfire Risk Assessment Report, TBESS, 2023).

Moreover, a hazard according to the NSW Department of Planning “is anything or situation with a potential for causing damage to people, property, or the biophysical environment” (p.6, Hazardous Industry Planning Advisory, Paper 6, Hazard Analysis).

Large-scale lithium-ion battery premises are generally classified as a hazardous development, or hazardous industry due to the inherent risks associated with lithium-ion batteries, particularly fire, explosion hazards, and toxic gas release, according to NSW Fire and Rescue, they go onto state “fire agencies internationally now recognise large-scale LiBESS as a hazardous electrical, chemical and fire risk with potential community consequence that necessitates special consideration throughout the design, installation and lifetime management of the asset” (p.2, Fire safety guideline Technical information, 2023). Generally, hazardous and offensive developments are prohibited in RU1 Primary Production Zones. RU1 land is zoned with the primary purpose to support agricultural activities. As stated in the NSW Government Planning, “when considering strategic planning, the primary emphasis needs to be on the suitability of land for the proposed range of uses, having regard to existing risk exposure and the sensitivity of the current land use” (p.6, Hazardous Industry Planning Advisory, Paper 4, 2011). The NSW Government Planning, go onto state that “zoning for the purpose of industry with a potential for accidental release of ecotoxic material would be inappropriate in an environmentally sensitive area, such as in proximity to threatened species habitat or near a natural watercourse or waterbody” (p.6, Hazardous Industry Planning Advisory, Paper 4, 2011). Within, the area surrounding the proposed Mangoplah BESS project, there are several ephemeral waterways directly within the portions or in proximity of the involved lands, ranging from 1st Order Streams to 5 th Order Streams which include Paper Forest Creek, and Burkes Creek, a 6 th Order Stream which flows into the Murrumbidgee River.

Furthermore, the NSW Department of Planning states that “for development proposals classified as ‘potentially hazardous industry’...should the risk exceed nominated criteria of acceptability, the development is classified as ‘hazardous industry’ and may not be permissible within most industrial zonings in NSW” (p.1, Hazardous Industry Planning Advisory, paper 10,

2011). This statement by the NSW Department of Planning is interesting, when an explosion of a large-scale lithium-ion battery energy storage system (BESS) is a significant risk and can easily exceed nominated criteria of acceptability. Lithium-ion battery explosions can lead to uncontrolled fires, toxic gas release, and significant property damage, potentially causing harm to people and the environment.

Moreover, the NSW Government, in the NSW legislation, Section 4.15, states in (1) “Matters for consideration-general in determining a development application, a consent authority is to take into consideration such of the following matters as a relevance to the development...” Section 4.15, goes onto further state in (iv) “the regulations that apply to the land to which the development application relates, (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality, (c) the suitability of the site for the development,...and (e) the public interest” (Environmental Planning and Assessment Act 1979 No. 203).

But more concerning is the probability that the proposed Mangoplah BESS project will be given development consent, even though, in New South Wales, large-scale lithium-ion battery storage systems are subject to specific planning requirements and conditions, primarily focused on safety, environmental impact, and operational considerations. These include restrictions on capacity, mandatory safety measures, and requirements for environmental impact. As stated in NSW Government, NSW legislation, Environmental Planning and Assessment Act 1979, No. 203, Section 4.14 “(1) development consent cannot be granted for the carrying out of development for any purpose...on bus fire prone land...”. According to the NSW Rural Fire Service, the area around the proposed Mangoplah BESS project site and the surrounding farmlands and the village of Mangoplah are located within a fire prone area. Bushfire prone land is land that is capable of supporting a bushfire or likely to be subject to bushfire attack (NSW Rural Fire Service). Furthermore, following the Victorian Battery Energy Storage System fire the CFA state that “properties identified as within a Bushfire Prone Area (BPA) are those likely to be subject to bushfire...Understanding the level of risk and likely fire behaviour at the site are critical factors in determining whether the location of a proposed facility is appropriate” (p.15, CFA Design Guidelines and Model Requirements: Renewable Energy Facilities, 2023). Additionally, “bushfire risk is defined as the likelihood of a bushfire occurring that will have harmful consequences to human communities and the environment. The bushfire risk of a location is influenced by the dominant vegetation type and conditions, topography, and surrounding land uses” (p. 252, Umwelt, Territory Battery, Eis, 2023).

It is of major concern that the residents of the village of Mangoplah and the surrounding landholders that RU1 land is being used for such a hazardous and offensive industry, when is documented by the NSW Government in the various Hazardous Industry Planning Advisory Papers that hazardous and offensive industries should not be built in a fire prone area, also stating that should a potentially hazardous industry exceed the nominated criteria of acceptability, that type of industry would not be permissible within most industrial zonings in NSW, so why should the proposed Mangoplah BESS project be allowed to be built within close proximity to the village of Mangoplah, to Livingston State Forrest and especially close to surrounding farmers, with toxic fumes from a lithium-ion battery fire affecting their livestock, soil, crops, and pasture grasses, resulting in loss of income, but the hazardous toxic plumes can also have a devastating impact on the ecosystem surrounding the area of Mangoplah.

Moreover, it is clearly obvious that all levels of government from local, state and federal are distinctly going against the aims, objectives and policies written within their environmental

plans and placing these dangerous, hazardous and toxic battery energy storage systems where ever they like. The community of Mangoplah feel that if this Battery Energy Storage System (BESS) were to go ahead, not only does it go against the aims, objectives and policies of all levels of government, as mentioned above, but it will have a devastating impact on the village of Mangoplah and the surrounding landholders, socially, economically, mentally, but also the surrounding environment, especially in the event of a fire occurring within the proposed Mangoplah BESS project.

It deeply affects and concerns me that a rural community like Mangoplah is being exposed to this degree of risk of having the proposed Mangoplah BESS project built within close proximity to the village of Mangoplah but also very close to productive farming and grazing land. Additionally, the change of land use from farming to industrial will negatively impact Mangoplah's rural setting and lifestyle. Please consider the environment, the cost to the Mangoplah community and surrounding farming families, many of whom have been here for generations, working hard to keep the area going, do not want the proposed Mangoplah BESS project to go ahead.