

## **Mangoplah Battery Energy Storage System (BESS) – Environmental Impact Statement**

**To:** NSW Department of Planning, Housing and Infrastructure

**Re:** Mangoplah BESS – State Significant Development

**Submission Type:** Objection

### **1. Introduction:**

I am a local landholder residing approximately 1.5km from the proposed Mangoplah BESS site. My family lives and works on productive agricultural land in very close proximity to the proposal.

### **2. Inappropriate site location on prime agricultural land:**

I object to the Mangoplah BESS as currently proposed due to its inappropriate siting on productive agricultural land in close proximity to existing rural residences. The EIS fails to adequately address the resulting land-use conflict.

The EIS states that the proposed site is classified as Class 4 under the NSW Land and Soil Capability Assessment Scheme. Class 4 land is described as land that can be cultivated only occasionally for the sowing of pastures or crops and is subject to significant limitations such as erosion hazard, weak soil structure, salinity, acidification, soil shallowness, adverse climate, wetness or stoniness, or a combination of these factors. As such, Class 4 land is considered suitable only for intermittent cultivation using specialised management practices.

By contrast, Class 3 land includes gently sloping land capable of sustaining cultivation on a rotational basis and is readily suitable for a range of crops, including cereals, oilseeds and pulses.

As acknowledged in the EIS, the proposed site is gently undulating, is currently under crop, and has historically supported dryland cropping and grazing enterprises. Surrounding properties in the immediate locality demonstrate that this land is capable of sustaining productive cultivation on a rotational basis over the long term.

On this basis, the classification of the proposed site as Class 4 land is not supported by the physical characteristics, historical land use, or demonstrated productive capacity of the land. The site more appropriately aligns with Class 3, indicating a higher agricultural value than represented in the EIS. This misclassification materially understates the agricultural impact of the proposal and undermines the EIS's assessment of land-use suitability.

### **3. Failure to Justify Location Outside Designated Renewable Energy Zones**

The EIS does not adequately justify why a large-scale industrial energy facility should be placed on prime agricultural land in close proximity to a rural community when alternative locations exist such as industrial zoned land or non-arable land. Furthermore, the NSW Government has established Renewable Energy Zones (REZs) specifically to guide and concentrate renewable energy and associated infrastructure in locations intended to host large-scale energy development. These strategic planning frameworks are designed to minimise land-use conflict, protect agricultural production, and reduce impacts on local communities. The proposed Mangoplah BESS is not located within a designated Renewable Energy Zone. The EIS does not provide a compelling strategic justification for departing from this framework, nor does it demonstrate why an industrial energy facility of this scale cannot be located within a REZ or other appropriately zoned area. As a result, the

proposal represents a misalignment with established state planning objectives and places an unreasonable burden on a productive farming community that is not intended to host industrial-scale energy infrastructure.

4. Industrialisation of Australia's farming land:

In addition to the inappropriate land use, the proposed BESS is 1.5km from my home. The EIS significantly underestimates the impact on rural amenity including the wellbeing impacts of living near a large industrial energy facility and the loss of rural character and sense of place.

5. Decommissioning risk:

The EIS does not provide sufficient certainty regarding the decommissioning of the project at end of lease. The community has been advised by Samsung that there is no financial security or bank guarantee in place as part of the lease for the make good of the project or rehabilitation of the land. Who bears this responsibility in the event of company insolvency? This presents an unacceptable long term legacy risk.

6. Community Benefit and Equity:

The EIS does not adequately address compensation of neighbouring landholders who will experience reduced amenity, increased biosecurity risks, fire risks and insurance premium increases. Neighbouring landholders should not be expected to subsidise state energy objectives through uncompensated loss.

7. Conclusion:

For the reasons outlined above, I object to the Mangoplah BESS. The project:

- Is inappropriately located on prime agricultural land outside of a designated renewable energy zone
- Creates unacceptable amenity, safety and legacy risks
- Fails to adequately address impacts on neighbouring landholders

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