

To Whom It May Concern,

Re: Molong Battery Energy Storage System (SSD-80471210) – Submission

This submission is made in relation to the exhibited Environmental Impact Statement (EIS) for the Molong Battery Energy Storage System in Cabonne Shire.

The proposed development is in close proximity to my property. After inspecting land in the vicinity of the proposed development, and as a person planning to build a family home in this rural area for our children, serious concerns remain regarding the long-term health and safety, environmental risks, amenity impacts, and financial impacts on neighbouring residents and properties.

This submission requests that consent be refused.

In the alternative, if consent is contemplated, strict conditions should be imposed and the proponent required to address the matters below:

1. Health and Safety Risks

Large scale battery energy storage systems introduce a low frequency but high consequence risk profile, particularly in rural areas. The EIS should be required to address:

1. Worst case scenarios
 - i. A clear description of thermal runaway scenarios, cascading failure risks, toxic smoke and firewater management, and offsite consequence modelling.
 - ii. Identification of credible initiating events (equipment failure, inverter failure, lightning, bushfire ember attack, vandalism, collision, grid events).
2. Separation distances and setback justification
 - i. The proponent should justify setbacks to residences and property boundaries using best practice guidance and quantitative risk assessment, not generic statements.
 - ii. If sensitive receivers (including future dwellings permissible under zoning) are nearby, the assessment should consider those as receptors.
3. Bushfire risk integration
 - i. The EIS should specifically address interaction between BESS and bushfire conditions (ember attack, radiant heat, access constraints, loss of power/water, smoke impacts).
 - ii. Clear asset protection zones, vegetation management, and ignition source control measures should be defined and enforceable.
4. Emergency management capability

- i. The proponent should demonstrate that local emergency response resources can realistically manage an incident, including water supply, access for heavy appliances, site layout for responders, staging areas, and communications.
 - ii. A detailed Emergency Response Plan and Fire Safety Study should be required prior to construction, developed in consultation with relevant agencies, and made publicly available.
- 5. Community notification and incident transparency
 - i. The proponent should commit to a community notification protocol for incidents, alarms, smoke events, and emergency services attendance, including after hours contacts and timeframes.

2. Chemical Contamination and Environmental Impact

The EIS should address contamination risk in a way that is practical and enforceable for neighbouring landowners.

The proponent should be required to address:

- 1. Hazardous materials inventory and containment
 - i. A clear inventory of chemicals stored onsite (including batteries, electrolytes, coolants, transformers, oils), with maximum quantities and material safety information.
 - ii. Engineering controls for containment (bundling, impermeable surfaces, drainage isolation, sumps) designed for extreme rainfall events.
- 2. Firewater and runoff capture
 - i. A specific, engineered firewater containment strategy sized for credible fire durations and volumes, including isolation valves and proof that contaminated water cannot leave site.
 - ii. Downstream receptors (creeks, dams, groundwater bores, wetlands) should be identified and protected with measurable design criteria.
- 3. Groundwater and surface water assessment
 - i. Baseline water quality monitoring (pre construction) and an ongoing monitoring program (construction and operation), with triggers, reporting, and enforceable remediation obligations.
 - ii. The EIS should identify hydrology and drainage pathways to neighbouring properties and demonstrate no increased risk of pollutant migration.

4. Remediation and liability

- i. A binding commitment that contamination detection triggers immediate investigation and remediation at the proponent's cost.
- ii. Clear arrangements for independent auditing and public reporting of environmental performance.

3. Noise

Continuous operation of inverters, transformers, and HVAC/cooling systems can have significant amenity impacts in rural settings, particularly at night and in calm meteorological conditions. The EIS should be required to address:

1. Operational noise in worst case conditions
 - i. Modelling should include night time, temperature inversions, low wind, and cumulative operation at maximum output.
 - ii. Tonal and low frequency noise should be specifically assessed, not assumed.
2. Construction noise and traffic noise
 - i. Construction hours, respite periods, and feasible mitigation (noise barriers, sequencing, alternative haul routes).
3. Compliance framework
 - i. Noise limits should be enforceable at relevant receiver locations.
 - ii. A complaints protocol, independent verification monitoring, and escalation requirements should be imposed (including mandatory mitigation if exceedances occur).

4. Visual Impact

A BESS facility is industrial infrastructure. In a rural landscape, visual impacts and lighting can significantly affect rural character and residential amenity.

The proponent should be required to provide:

1. Accurate visual simulations from representative public viewpoints and from nearby residences, including day and night scenarios.
2. Design and landscaping commitments
 - i. Minimum landscaping standards, plant species, maintenance periods, replacement obligations, and timeframes to achieve screening.

- ii. Treatment of fencing, security infrastructure, and equipment colours to reduce contrast.
- 3. Lighting design and limits
 - i. A lighting plan adopting “dark sky” principles, motion sensor use where feasible, shielding, curfews, and demonstration that light spill to neighbouring properties is minimised.

5. Traffic / Roads

Rural roads can be sensitive to heavy vehicle movements. The proponent should address:

- 1. Traffic generation and road upgrades
 - i. Heavy vehicle numbers, timing, oversize loads, intersection safety, and road condition impacts.
 - ii. Commitments to repair/upgrade roads impacted by construction traffic.
- 2. Construction management plan
 - i. Dust suppression, speed limits, signage, and complaint handling.

6. Property Values and Land Compatibility

The proponent should be required to address:

- 1. Land use conflict and planning consistency
 - i. How an industrial style facility is compatible with surrounding rural and residential uses, including potential future dwellings permissible under planning controls. Based on the zoning, Council has foreshadowed significant residential development in the immediate area.
- 2. Amenity impacts translating to financial harm
 - i. Consideration of property devaluation risk and whether any neighbour impact mitigation/compensation framework is proposed and/or sufficient.

7. Financial Viability, Decommissioning

There is a significant concern that if the project becomes financially unviable, the site may be left with residual contamination risk, degraded infrastructure, and ongoing security/safety hazards.

The proponent should be required to provide:

1. A detailed Decommissioning and Rehabilitation Plan
 - i. Clear end of life obligations, recycling/disposal pathways, contamination assessment requirements, and rehabilitation standards.
2. Financial assurance / security
 - i. A consent condition requiring a bank guarantee or similar financial security adequate to cover decommissioning, waste disposal, and remediation, so that the burden does not fall on neighbours or the community.
3. Ownership/operator change controls
 - i. Clear obligations that continue to apply if the operator changes, including maintenance, monitoring, and incident reporting requirements.

8. Community Benefit and Equity

Nearby residents appear to bear disproportionate risk and amenity impacts, while benefits are exported elsewhere. The proponent should be required to address:

1. Genuine community engagement and ongoing consultation
2. Local benefit measures - whether any community benefit scheme, local infrastructure contribution, or local resilience measures are sufficient.

Conclusion

For the reasons outlined, we strongly object to the Molong Battery Energy Storage System and requests that development consent be refused.

If consent is nevertheless considered, it is requested that the consent authority require the proponent to address the matters above with site specific evidence, and impose strict, enforceable conditions, including independent monitoring, transparent reporting, and financial security for decommissioning and remediation.

Thank you for considering this submission.

Jeremy Scott & Deanne Scott

36 Deight Street, Molong