

Submission – Objection

Apsley Battery Energy Storage System – Modification 1

Application reference:	SSD-35160796-MOD-1
Applicant:	Energy Storage Project No 3 Pty Ltd
Site:	9010 Mitchell Highway, Apsley NSW 2820
To:	NSW Department of Planning, Housing and Infrastructure (Energy Assessments)
Submitted by:	Michael Burrough
Address:	PO Box 316, Wellington NSW 2820
Interest:	Local resident
Date:	19 June 2026
Position:	OBJECT

I make this submission **objecting** to the proposed Modification 1 of the Apsley BESS consent. I am a resident of Wellington, the town nearest to the site and the town the applicant relies upon to house its construction workforce. The proposed changes therefore directly affect my community. While I do not object to battery storage in principle, I object to this modification on the grounds set out below. In each case the modification report asks the Department to treat material changes as having ‘no or minimal’ impact, and the supporting reasoning does not withstand scrutiny.

1. Increased fire risk and pollution from higher-density batteries

The modification **doubles the energy stored on site, from 240 MWh to 480 MWh – a 100% increase** – while keeping the same delivery capacity and an only marginally larger disturbance area (6.4 ha to 7.7 ha). It achieves this by concentrating energy into denser units (a change from 138 forty-foot containers to 96 twenty-foot containers). Despite this, the report concludes that the hazard profile ‘remains unchanged’. I do not accept that doubling the stored energy in a comparable footprint leaves the fire and hazard profile unchanged, for the following reasons:

- **Energy density drives thermal-runaway risk.** The total energy available to a thermal-runaway event has doubled, and it is held in more tightly packed units. Container spacing, propagation between units, and the scale of a worst-case event are precisely the variables that determine off-site consequence. The report does not demonstrate why these have not changed; it asserts the conclusion.
- **The site is now bush fire prone land.** The report itself states the site is now mapped as bush fire prone land (vegetation category 3) – a material change in site conditions since the 2023 approval. A doubling of stored energy on newly designated bushfire-prone land warrants a fresh, rigorous hazard analysis, not a review concluding ‘no additional risk’.
- **The Department has already flagged this.** The report records that at the 18 March 2026 briefing, DPHI raised questions about container numbers and spacing in relation to fire hazards. Those concerns are not adequately resolved by a report that treats the hazard profile as static.
- **Pollution and contamination.** A thermal-runaway fire in a lithium-ion BESS releases toxic gases and generates contaminated fire-water runoff. Groundwater at the site sits approximately 20 m below the surface, and a neighbouring landowner has already raised concern about leaching into the underground aquifer. Doubling the battery inventory increases both the volume

of potential emissions and the fire-water requiring containment. The report does not quantify this in light of the increased capacity.

I ask that the modification not be determined until an **independent, updated Preliminary Hazard Analysis and Bush Fire Assessment** specifically address (a) the doubled energy inventory, (b) inter-unit fire propagation at the increased density, (c) the site's new bushfire-prone-land status, and (d) fire-water containment and aquifer protection – and until Fire and Rescue NSW and the RFS have confirmed adequacy of response capacity for the modified facility.

2. Lack of suitable local accommodation for the construction workforce

The modification **doubles the peak construction workforce, from 50 to 100 workers**, and extends construction **from 5 months to up to 18 months**. As a Wellington resident, I am directly familiar with this town's accommodation capacity, and the report's basis for concluding the workforce can be accommodated is inadequate:

- The accommodation assessment rests on phone calls and desktop research with Wellington providers, concluding only that 'adequate accommodation is available in Wellington'. No occupancy data, capacity figures or booking commitments are provided to substantiate this for a doubled, longer-duration workforce.
- The report is internally inconsistent. Dubbo Regional Council's agreed position was that workers would be housed in a *single accommodation facility* (a block booking), yet the accommodation list is a spread of small Wellington motels, caravan parks and a rental property. Table 5 records a suggestion to use temporary workers' accommodation in Wellington 'if it is viable in time for construction to start' – language that concedes such accommodation may **not** be viable in time.
- From direct local knowledge, Wellington does **not** have spare capacity to absorb up to 100 workers for 12–18 months without displacing tourists, seasonal workers and existing demand at the caravan parks, motels and the Wellington Caves Holiday Park. Treating this as resolved by a few phone calls is not a credible social-impact conclusion, and the displacement of visitor accommodation has flow-on effects for the local tourism economy that the report does not assess.

I ask that the Department require a **binding workforce accommodation strategy** – with confirmed capacity and a secured fallback (such as a purpose-built temporary accommodation facility) **as a condition of consent before construction** – rather than a 'local workforce plan to be completed post-approval'. Approving the doubled workforce on the current evidence risks real housing-market and amenity impacts on the Wellington community.

3. Inadequate and non-transparent assessment of traffic impacts

The modification **increases heavy-vehicle movements from 18 to 50 per day – a 180% increase** – and introduces **six high-risk oversize / over-mass (OSOM) escorted movements**, across an extended 18-month construction program, on the Mitchell Highway: a single-lane-each-way classified road with a 100 km/h posted speed limit. The report nonetheless characterises the traffic impact as 'minimal' and 'substantially the same'. My concern is with the adequacy and transparency of the assessment, not merely its conclusion:

- **The OSOM route is not settled or disclosed.** The report assesses two alternative origins (Port of Newcastle and Victoria) and states only that one will ultimately be used, to provide flexibility for procurement. Affected residents cannot assess the impact of escorted oversize movements

when the actual route, timing and frequency are left open. A desktop route survey is not a substitute for a committed, disclosed route.

- **A 180% increase is not ‘substantially the same’.** The report acknowledges the quantitative increase but assures readers it can be accommodated within the approved turning treatment, providing no construction traffic-management detail – staging, escort timing, interaction with the 100 km/h highway and the new intersection, or peak overlap – to support that assurance.
- **No cumulative traffic analysis.** With other renewable-energy projects in the Central-West Orana REZ, the cumulative heavy-vehicle load on the Mitchell Highway over an extended construction window is not transparently addressed.

I ask that the Department require, **before determination**, (a) disclosure of a single committed OSOM route with a route-specific assessment, (b) a Construction Traffic Management Plan addressing the increased movements and escorted oversize loads on the Mitchell Highway, and (c) a cumulative traffic assessment for the construction period – and that Transport for NSW confirm these in writing.

Conclusion

This is not a minor modification. It doubles the stored energy, doubles the peak workforce, extends construction more than threefold, and almost triples daily heavy-vehicle movements on a high-speed rural highway – on a site now classified as bushfire-prone. The report repeatedly asks the Department to accept ‘no or minimal impact’ without commensurate evidence. I respectfully ask that the modification **not be approved** in its current form, and that – at minimum – the matters above be independently re-assessed and secured by enforceable conditions before any determination. I am willing to be contacted in relation to this submission.

Michael Burrough

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