

MAJOR PROJECTS PLANNING.

OBJECTION Submission SSD 76008209

Comet Park Battery Energy Storage System

The overview in the EIS states the Comet Park BESS is estimated to comprise a footprint of 4.83 ha with an overall footprint and disturbance area of the project being approximately 53 ha and will encompass all aspects of the Project with the exception of the off-site transport route. It is within the Leeton Local Government Area (LGA) and the administrative boundaries of the Leeton and District Local Aboriginal Land Council (LALC).

State Significant Agricultural Land

The NSW Department of Primary Industries is undertaking a mapping program to identify State Significant Agricultural Land (SSAL). A map of SSAL is being developed as an **essential component of agricultural land use** planning, enabling clearer local planning with informed prioritisation of future land uses.

The SSAL is mapped within the Project Footprint (as shown in Figure 10).

The Mapping in figure 10 Clearly demonstrates that the whole of the project area and neighbouring district are all within **the SSAL mapped area**. It is preposterous that a development application is even being considered in an area that is clearly mapped to be SSAL. What is the point of undertaking mapping of SSAL to protect our agricultural industry when there are loopholes and by ways inserted into every step of the process to allow and expedite projects intending to overrule barriers that are designed and implemented to preserve and maintain our agricultural industry?

Figure 5. clearly demonstrates the current land use to be 4.3.0 Irrigated cropping, 3.3.0 Cropping, 4.2.0, Grazing irrigated modified pastures and extensive neighbouring land to be 4.4.0 Irrigated perennial horticulture, and similar or same land use.

The Project Area and locality have historically been utilised for agricultural practices primarily consisting of irrigated cropping and livestock grazing, with evidence of broad native vegetation modification resulting from extensive clearing and agricultural land use. Current land use comprises livestock grazing and cropping. Agriculture in the region includes beef grazing and temperate fruit (oranges, apples, pears, grapes and cherries) production in the east, through broad-acre cropping (cereal, oilseed and pulses), beef and sheep grazing, intensive poultry and pig production for products and slaughter, irrigation cropping (cotton, rice and maize), to rangeland grazing in the west. The Project Area is located within the Murrumbidgee Irrigation Area (MIA), which along with the Coleambally Irrigation Area (CIA) provides over one-quarter of all the fruit and vegetable production in NSW and is also one of Australia's largest exporters of bulk wines. While the duration of the proposed project is estimated to be thirty years before decommissioning or repurposing that period of time is over quarter of a century of land farming and agri practices removed from the economy. Cumulatively, considering the number of developments proposed for the area in the foreseeable future we are looking at hundreds and thousands of hectares of viable and arable agricultural land removed from food production in the SW area of the Murray Darling basin and Riverina districts. Included in the land clearing will be trees, foliage and undergrowth vegetation of hundreds of different species that all play a significant role in the revegetation and

restoration efforts in the region, contributing to the health and continuing sustainability of the local environment and the topography of the region.

IMPACTS ON AGRICULTURAL LAND

The impacts BESS facility activities can have on land resources and agricultural productivity range from short term temporary impacts to long term and permanent impacts. Temporary impacts can include the removal agriculture from service over a period of the life of the Project. Permanent impacts may include changes to land and soil capability and agricultural resources of the Project Area. Permanent impacts are irreversible and compromise the reinstatement of agricultural lands and land productivity.

Battery Energy Storage systems:

It is recognised and documented that Battery energy storage developments can and will alter a natural watercourse through the change of natural site topography. The increased water runoff from the Battery modules can and will lead to erosion and sedimentation impacts during the construction phase and over the duration of their lifespan leaving a legacy of permanently altered natural water flows that will not provide continued water distribution to existing plants and trees

It concerns me that a single event could lead to “irreversible contamination” of land and nearby water storage for neighbouring livestock’s and while PFAS are known carcinogens and can persist indefinitely in groundwater, very little is known about other carcinogenic properties and contaminants leaching from battery modules. For local graziers and nearby communities Colleambally Irrigation area that share the natural water course and run off from tributary systems in this proposed area it will add further unnecessary stress of having a serious contamination event with a BESS project along with documented environmental harm to our waterways making regional farming untenable and causing unconscionable stress and anxiety to the mental health of our regional communities. The average lifespan of this BESS unit is estimated to be thirty years, and the cumulative damage to the surrounding areas will result in the land being completely unviable for any type of farming activity or restoration to revert to native animal habitat in the near and far future.

Impact on Road Infrastructure & Local Traffic

The proposed road transport route from Port Kembla to the BESS facility access point is via Port Kembla’s surrounding regional road network to the NSW major road network along Princes Motorway, Hume Highway and then Sturt Highway to Narrandera along Irrigation Way before turning left at Euroley Road and then turning right at River Road. Throughout NSW, and more noticeably the Riverina, there are already grave concerns about REZ projects and their short- and long-term impact on local roads and highways.

The toll of increased traffic through trucks, construction vehicles, and transport of heavy machinery and industrial components will add further stress on our highways and in particular the Sturt highway for local traffic users and interstate haulage. There are already a number of key high-risk accident areas with reduced visibility, so it is very concerning to see another development requiring access along this route being proposed along one of the highest accident prone and dangerous sections of the Sturt highway. There has already been a number of documented high-speed accidents along this route over the last few years, and this proposal will intensify the traffic of heavy vehicles for the transportation of the components required for the construction of these developments and continue to push the capacity of the Sturt Highway. There are also considerable risks and hazards associated with the transport of oversize vehicles on local, regional and state roads, including visual amenity for small vehicles traveling the same route in areas with limited or **no overtaking lanes**.

The expense to upgrade and maintain these local roads networks is substantial, there is no indication anywhere of who is responsible for the ongoing financial burden of these works. It is grossly unfair of developers to expect community rate payers and regional taxpayers to carry the burden of local shire and regional road damage caused by independent developers and overseas investors. It is also obviously unfair to expect local traffic, other trade workers, tourists and grey nomads to have to wait long periods on sections of road that are under repair or construction and to give way to allow heavy vehicle and oversized transport.

In closing I continue to be disappointed at the casual disregard that many of the land hosts and developers casually dismiss the effect these projects are having on our lifestyles and the added stress to our mental health because we live in areas more sparsely populated compared to dense city living and suburban areas. It does NOT automatically give licence to the destruction of hobby or small farming industries, our agricultural industry and our precious water resources. Since 2000, roughly 80 per cent of referred projects have been approved, often with minimal conditions. Government legislation is giving the green light to speed up further the destruction of our environment and the agricultural capacity of our regional communities by providing the Minister with autocratic powers to ram through renewable energy approvals under the guise of 'Critical infrastructure'.

This removes all powers to oppose and object to SSD renewable energy projects from the community and owners of projected land use for renewable energy projects, while ignoring or overriding developments on SSAL. The adoption of this legislation has also put transmission line builds, industrial wind, solar, battery and AI data centres ahead of rural people, wildlife, farmland and real environmental care. Reckless actions spurred on by propaganda and supported by citycentric mindset of supporters that embrace the

dogma of “renewable energy” are punitive to farmers, agriculture and indifferent to future social and ecological consequences in our regions.

This legislation will also remove the last recourse for community members and farmers to object to these proposals through the Planning process and our last bastion, The Independent Planning Commission, and ultimately, the jobs and appointments of those that work in these departments.

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