

Rod Hazell | Owner: 253 Whitehouse Lane | Tamworth NSW 2340

To the Proponent and the Department

I am writing to formally object to the proposed Tamworth BESS project. Our objections and questions are presented below.

Concern	Categories of impact	Technical Assessment
<p>The width of the local roads is questionable. If vehicles need to cross the centreline (regardless of whether one exists), there needs to be a plan for controlling this, along with addressing the potential delays to traffic.</p>	Way of life, Safety, Access	Traffic
<p>The load of the trucks and OSOM (Oversize Overmass) vehicles on these local roads is concerning. These roads should be upgraded in terms of pavement type and width to avoid damage and potholing at the edges, especially given their narrowness. This issue is compounded by the presence of opposing traffic, such as cattle trucks, livestock, and horse floats.</p>	Way of life, Safety, Access	Traffic
<p>Dirt and gravel roads pose significant issues, including dust (affecting health and visibility/safety) and potholes.</p>	Health and safety	Traffic
<p>The assessment must consider all potential movements for construction traffic and OSOM movements (e.g., wind turbines) heading to the NE REZ, particularly the turn movements from the NEH.</p>	Cumulative impacts, Way of life, Surroundings	Traffic
<p>Section 4 of the traffic assessment highlights a critical concern: given the scarcity of water in the area, relying on local water for dust suppression on roads is unwise. Sealing the roads would be much more beneficial to both the environment and the community.</p>	Health and Safety, Resilience to rural communities and impacts on water supply	Traffic
<p>Community Engagement and Representation: The level of community engagement in summarising views and values is insufficient. In SIA, it's crucial to ensure diverse and extensive consultation with affected communities to capture a comprehensive range of local perspectives. There is no evidence of broader community engagement using an 'opt-in' approach. For example, we live along Whitehouse Lane and have not been consulted with at all, despite being identified as a property within 1-2km.</p>	Decision making systems, Engagement, Transparency	Social
<p>The SIA focusses on quantitative data: While establishing a socio-economic baseline using open-source data via a desktop study is beneficial, it neglects the qualitative data that captures the lived experiences of the local population. There should be a balance between quantitative and qualitative approaches. The SIA hasn't used a proportionate mixed-methodology approach.</p>	Research, Engagement, Not inclusive	Social
<p>Detailed Mitigation Strategies: The provided context mentions "describing possible mitigation measures" but does not specify the detail or practicality of these measures. Effective mitigation strategies should be actionable, well-documented, and capable of addressing identified impacts thoroughly. There is no mention of a plan for ongoing monitoring and adaptive management of social impacts throughout the project's lifecycle. Continuous evaluation and ability to adapt strategies based on new data or emerging issues are essential for an</p>	Engagement, Transparency, Trust	Social

<p>effective social impact assessment. If we don't have visibility as a reader of this document of the proposed mitigation measures and how they will be tracked, reported on, and adapted if they aren't working, then how can we have any trust and faith in this development?</p>		
<p>Cumulative Impacts: While cumulative impacts are identified as a priority issue, the context does not elaborate on how these are assessed in the social domain. Assessing cumulative social impacts in conjunction with other regional developments is important to understand broader, long-term effects on the community. With everything that is happening in the New England with the REZ and other proposed developments of quarries etc, the cumulative impacts seem to have been all but forgotten from a social sense.</p>	<p>Cumulative impacts on broader population, Incomplete assessment</p>	<p>Social</p>
<p>Inadequate social risk assessment: The risk assessment should not only consider the severity of the risk but should also clearly consider who is expected to be affected and what is the consequence? (extent and sensitivity). For example, table 6.40 completely disregards 'people' – the whole focus of social impact assessment, in assessment of risks. Who is going to be affected by the impact? Are there any vulnerable receivers along the transport route that will be impacted by the increase in dust being kicked up by the increased haulage? Any elderly, people with disabilities, people suffering from asthma? It fails to consistently address who will experience that impact and what will be the consequence on them.</p>	<p>Inadequate risk assessment, People are supposed to be at the centre of SIA, where are the people and vulnerable groups in the risk assessment. We've no idea who is assessed as being impacted and who is not.</p>	<p>Social</p>
<p>There have been several incidents in Australia where Battery Energy Storage Systems (BESS) have caught fire. Some notable examples include:</p> <p>Victorian Big Battery Fire (2021): A Tesla Megapack caught fire at the Victorian Big Battery in Moorabool, Victoria, during the final stages of commissioning. The fire spread to a neighbouring Megapack and burned for about three days before being contained. The cause was determined to be a coolant leak that led to a thermal runaway event (Teslarati) (pv magazine Australia).</p> <p>Bouldercombe Battery Fire (2023): Another Tesla Megapack caught fire at the Bouldercombe battery project in Queensland. This incident occurred during the commissioning stages and was contained to one Megapack unit. These incidents highlight the potential risks associated with BESS and underscore the importance of robust safety measures and incident response plans to mitigate such risks.</p> <p>There is now precedent that Volunteer firefighters say they will not fight fires around new renewables projects, transmission lines. This is a major concern.</p> <p>As a resident living near the Tamworth BESS project and having family in and around the area, I seek answers to these important questions:</p> <p>Thermal Runaway: What measures are in place to monitor the potential for thermal runaway events in the LFP cells, given that they are less prone but not immune to such events?</p> <p>Fire Risk: Despite the UL9540A certification indicating no observed external flames during testing, what measures will be taken to mitigate the risk of internal fires in the BESS units?</p>	<p>Health and Safety, Livelihoods, Community cohesion</p>	<p>Hazard Assessment</p>

<p>Installation Compliance: How will the proponent ensure that the installation of the BESS units follows the UL9540A testing conditions and NFPA 855 standards to maintain safety?</p> <p>Emergency Response: What emergency response measures are in place to handle potential incidents at the BESS, and how will the local community be made aware of these measures?</p> <p>Maintenance and Monitoring: What regular maintenance and monitoring procedures will be implemented to prevent the occurrence of failures or malfunctions in the BESS units?</p> <p>Firefighter Refusal: What contingency plans are in place if local firefighters refuse to address fires at the BESS, and how will the proponent ensure the safety of the surrounding community in such a scenario?</p> <p>Where is your engagement with the community about all of these risks???</p>		
<p>Visual: Firstly, the visual impact assessment notes that the nearby residences could experience moderate to low visual impacts before any mitigation. Given my proximity to the project, I am concerned that the proposed mitigation measures, such as strategic landscaping and vegetation screening, may not sufficiently reduce the visual impacts to a satisfactory level. The current rural landscape, characterised by agricultural use and minimal industrial intrusion, is a major aspect of our community's character and quality of life. Introducing a large industrial structure like the BESS without adequate consultation or consideration of resident views is unacceptable. Moreover, while the project claims to align with local planning guidelines and aims to preserve the current landscape character, this does not address the potential day-to-day visual disturbance for residents like myself.</p> <p>The assessment only identifies 8 residences within 1 km as potentially impacted, minimising the broader concern of those slightly further afield who still face a significant change in their visual environment. It is disheartening that those of us living within 1-2 km of the site, who will undoubtedly notice and be affected by this change, were not even given the opportunity to voice our concerns or provide input. I request that the project proponents re-evaluate the visual impacts with proper consultation from all nearby residents, not just those within the immediate 1 km radius. Ensuring the implementation of more effective mitigation strategies and truly preserving the rural landscape character is crucial to maintaining the community's trust and quality of life.</p>	<p>Surroundings Way of life Community Livelihoods</p>	<p>Visual and Social</p>

I urge you to address these concerns comprehensively to ensure that the development respects our local community's way of life, safety, health, and environment. Proper community engagement, detailed and practical mitigation strategies, and a balanced assessment approach are essential to achieving this.

I look forward to your response and seeing these issues addressed promptly.

Rod Hazell