Submission by Peter Gill Dated 23 June 2024

Tamworth NSW 2340

Email:

Lodgement via Webmail system: Using Online Submission

I have made NIL reportable Political Donations

I accept the Department's disclaimer and declaration

** To be redacted: ie shaded content.

SSD 23830229 Tamworth BESS

This submission is lodged on a personal and individual basis. The context of my experience is as a resident of Tamworth.

I am generally supportive of the concept of Renewable Energy Initiatives.

In this case as my support is conditional upon a number of issues being satisfied/met, my submission as submitted should be classified as being an objection until the matters raised have been resolved favorably.

Comments:

As pointed out by the Proponent, Renewable Energy projects and in particular BESS are a relatively new happening within the construction space and are happening at pace. Accordingly community members are placed in fast learning curve situations in attempting to make informed responses.

It is my strong view that it is incumbent upon the Proponent to perform their EIS competently and in the detail required. In fact for myself personally, I make judgements based on the quality of the presentation to inform and judge whether the Proponent intends to meet the Project conditions and be a responsible Constructor/Operator. In this sense it is imperative that the Proponent be reactive to Community input and pro-active in resolving issues.

To that extent, similar applies to the Approval Authority.

I wish to make the following points as a comment.

1) Co-Location

- The Proponent indicates that two (2) other BESS projects are happening within the immediate vicinity (Calala BESS and Kingswood BESS). The Proponent also notes some flexibility regarding the location of their Tamworth BESS.
- Whilst not stated (and noting that the Proponent and AGL have an agreement for 200MW maximum input to the nearby Calala substation) it is presumed the other two BESS projects have authorized capacity agreements separately such that the absorbed capacity of each is additive rather than them being allocated on a rotating basis (ie that the facilities are each capable of being fully utilised to their respective capacities).
- I am unsure of the role of DPIE as the approval body to make such recommendations, however, I make the point that co-location of the three facilities should generate cost and access synergies to the advantage of all proponents, reduced environmental effects visually and reduced numbers of affected receivers.

2) Public Consultation

It is noted the Proponent refers to contacting close neighbors and implementation of a website. Whilst this is commendable it is noted that nothing appeared on the Tamworth Regional Council website. Furthermore I found it difficult to locate the Exhibition under the DPIE and NSW Planning Portal websites. The point is made that people at distance (5km in my case) may still be affected or have reason to deal with the development.

My comment above involves both the Proponent and the Approval Body. I make the very strong suggestion that as a minimum such exhibitions are at least flagged within the "have your say" sections of the relevant Local Council websites similar to the way other Development Applications are advertised.

3) SEARS

It is noted that for the Updated Issued SEARS document, the expiry date for lodgement of a Development Application (DA) and EIS was 01 March 2024. It is presumed that lodgement of a DA and EIS immediately invoke the Public Exhibition phase. Further note is made of, for example, the EIS Summary Report Version V7 dated 22 May 2024, the EIS Version V10 dated 22 May 2024 – all after 01 March 2024.

I wish to make the following Points of Objection:

1) Minor Errors

In various places in the documents there are some errors which may be classified as minor.

The point is made that:

- This reflects a quality of presentation and attention to detail by the proponent that may carry through into the following phases.
- EIS documents are often used as the basis for further phases and incorrect information within the EIS can be carried forward into future phases of the design/construct/operate/maintain phases.
 - Some examples are (document reader page No's)
 - Page 84: Acid Sulphate soils incorrect AHD of 970m quoted (it is more 970 feet or 300m).
 - Page 85: The exclusion of approximately 3.2 Ha incorrect figure for area.

2) Environmental – Water Discharge

I have been unable to find any reference to the detail as to how water run-off is managed.

It is usual to divert clean water around the works, and manage contaminated water to ensure no pollution occurs. The following situations are envisaged.

- Stormwater external clean water
- Stormwater within bunded area potentially contaminated
- Water from firefighting within bunded area

It is normal practice to bund areas subject to, or where contamination may occur. There then needs to be a regime where contaminated water is collected for treatment or removal for treatment. With electrical equipment it is not desirable to have ponded water. The required methodology needs to be thought out and designed/constructed.

There appears to be no methodology provided within the EIS. The required systems may require the ability to collect/store water outside the "electrical area" in a detention system prior to treatment/management for discharge towards Goonoo Goonoo creek.

A similar methodology would need to be applied in the situation where fire-fighting takes place to prevent the water travelling un-checked to Goonoo Goonoo creek.

3) PHA – Ventilation Backup

Based on a very basic level of knowledge, it is my understanding that Lithium batteries become subject to thermal runaway if they become too hot. Clearly ventilation fans are used for cooling of the BESS units.

It appears that the EIS does not consider the situation of a Total power failure to the cooling fans and how this may be dealt with, ie is a standby power source necessary?. The situation might arise from either a total grid failure or be occasioned by a lightning strike during a storm (usually summer) when the BESS units are operating in an already warm environment.

4) Fire Fighting

- It is noted that 20,000 litres of tankage is shown. The presence of a mains water supply and sizing if any is unknown. Lithium fires require large amounts of water to extinguish and to cool adjacent BESS units. The limited amount of storage at 20,000 litres appears small for this eventuality.
- It appears the Proponent is reliant on the assumption that NSWF&R or the NSW RFS are able to handle an emergency, without regard to or verification of their resourcing, training, equipment or capability. There appears to be no check or consideration of this point.
- Again based on a very basic level of knowledge, lithium batteries may explode in a fire. It is noted that on the southern end of the compound, BESS units are approximately 10m from the facility boundary backing onto a grassed paddock.

5) Earth Grid

It is my understanding that earth grids are commonly required in Switchyard situations to manage stray earth currents. I have been unable to find any mention or reference to this, either that they are required or not required

Thank you for considering my submission.

I am prepared to amplify any points made above, if required.

Peter Gill

23 June 2024