

Objection to the Proposed Gara Battery Energy Storage System (SSD-71680710)

Submitted by: Resident of R1

Introduction

Our household and farm is one of the five non-associated residential receivers located adjacent to, and within one kilometre of, the proposed development site. Most surrounding land, including the development site itself, is zoned RU1 Primary Production and is historically used for agriculture and rural residential purposes.

All five residences overlook the quiet and visually amenable Burying Ground Creek Valley, a relatively tight and scenic pocket of undulating grazing land. Our community is connected through common purposes: agricultural grazing, enjoyment of a quiet rural lifestyle, respect for wildlife, preservation and extension to established native wildlife and biodiversity corridors, and the courtesy of keeping neighbours informed about activities that might affect them.

We are located along the scenic tourist route, Waterfall Way, linking Armidale to the coast. This area is generally protected from traffic noise by TSR reserve tree corridors and has no industrial land use, with the only visible structures being homes, sheds, dams, and fences. We were therefore shocked by the proposed location, size, and impacts of this development, which would introduce industrial noise, infrastructure, and lighting into a rural landscape.

Opposition

1. Location and Size

From the standpoint of local planning, historical land use, environmental hazards, and social amenity, this large-scale industrial development does not belong in this valley. The proposal's footprint of 22 hectares is grossly disproportionate to the landscape and inconsistent with surrounding agricultural and residential land use.

Rather than blending harmoniously into the landscape, the design gives little confidence that it respects or maintains the integrity of the valley it would occupy.

2. Above-Ground Transmission Lines

The scoping report page 21, indicates that the underground grid connection is technically feasible, i.e.: *'The Gara BESS will comprise of the following key components: An underground or overhead transmission line of up to approximately 1 kilometre long to connect the BESS to the existing 330kv transmission line'*.

Yet the proponent and the proposal have consistently excluded this option. None of the five residences most affected currently experiences visual intrusion from grid transmission lines. If this project were to proceed, undergrounding the grid connection should be mandatory to preserve environmental integrity and reduce visual impacts. I note that the Hunter valley gas project, also important in the transition from coal, is buried underground to ensure minimum impact to landholders and the environment.

3. Consultation and Mitigation Failures

Residential receivers are not satisfied that consultation has led to genuine outcomes. Our expectation was for transparent dialogue with Ace Energy and for adequate mitigation measures to be introduced. Instead, key mitigation elements have been minimised, excluded, or altered inconsistently compared with what was presented during earlier stages.

Our last inclusive meeting was held on 2 April 2025 at Kent House, Armidale. At that meeting, residents were presented with a comprehensive mitigation plan. The current concept plan falls far short of what was indicated and presented, eroding confidence in the honesty of the consultation process.

In particular, treelane planting along the common eastern boundary was originally identified as a necessary measure to provide visual screening, noise buffering, and to maintain a wildlife corridor that supports koalas and other native species. These plantings are critical in preserving both amenity and biodiversity. Furthermore, Ace Energy previously committed to constructing an acoustic wall around the entire development, but the current plans include only a partial wall. This represents a significant departure from commitments made during consultation and leaves residents exposed to unacceptable impacts.

Ace Energy initially committed to matching treelines along the boundaries and constructing a full acoustic wall around the development. These commitments have since been abandoned. Instead, responsibility for visual screening and noise mitigation has been effectively transferred onto residents, with planting and ongoing management expected to occur on our land rather than on the proponent's. This represents not only a breach of responsibility but also an unacceptable transfer of obligation from the developer to the affected community.

4. Construction and Ongoing Amenity Impacts

The construction phase is forecast to last 14 months (60 weeks), including 4–5 months of heavy civil works, piling, and high traffic volumes. Works are scheduled for 7:00 am–6:00 pm weekdays and 8:00 am–1:00 pm Saturdays, creating ongoing disruption to daily life.

The impacts will include intense construction noise, dust emissions, and up to 75 heavy vehicle movements per day crossing directly over a shallow domestic town water easement. This pipeline, buried only 20–30 cm below the surface and built of rural-grade poly pipe,

was never designed to withstand such traffic and is at high risk of rupture. From an engineering viewpoint I propose that this easement needs to be mapped into position, as with other easements in the scoping report, so as to be easily referenced during the road construction period.

Beyond construction, the facility will generate a permanent 24/7 industrial hum from switching station transformers and battery cooling fans with the addition of security lighting been introduced into the night environment. These operational noise levels are acknowledged in Ace Energy's own reports as exceeding rural baseline thresholds, undermining the peace and quiet that defines our locality.

Conclusion

This proposal should not be approved. It fails to address the concerns of those most directly impacted, including:

- Environmental integrity and protection of the Burying Ground Creek Valley;
- Land use harmony with surrounding RU1 farmland and residences;
- Historical and cultural continuity of agricultural land;
- Visual and auditory amenity of affected homes; and
- Social impacts on the nearest residential receivers.

This proposed development, if it was to proceed, would be implanted into our environment for possible 40 plus years. Had Ace Energy's proposal shown a genuine commitment to addressing and minimizing major impacts to local stakeholders, much trust, credibility and legitimacy in the process and in the development itself, would not have been so severely eroded.

Ace Energy has attempted to shift the burden of mitigation back onto R1 and R3 by expecting us to undertake tree planting and long-term management on our own land. Screening and noise reduction should be delivered entirely on Ace Energy's land, not transferred to residents already bearing the brunt of the impacts. Furthermore, Ace Energy has given no consideration to any form of compensation that duly reflects the scale of disruption and the permanent loss of amenity this proposal will impose on affected households. The compensation offered to date is vastly inadequate, failing to account for the noise, dust, visual industrialisation, fire and safety risks, and the irreversible erosion of peace and rural lifestyle. Adequate compensation must recognise both property value and the profound, ongoing impacts on health, wellbeing, and community life.

I appeal to the Minister for Planning and Public Spaces, responsible for consent, to give due weight to those most directly impacted before any approval is granted.

I also concur with, and support, the objections made by fellow residential receivers at R2, R3, and R6.