

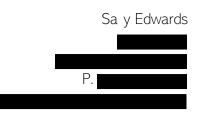
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Thunderbolt IPC SUBMISSION to additional information 3rd April 2024

Dear Mr Stephen Barry and Panel Commissioners

Please accept my submission regarding the additional information provided to you, the Panel, by the DPHI and Neoen. I have inserted the items I wish to address in the table below and any associated, comment, concern or recommendation.

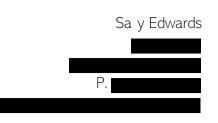
Item/Details	Comment/Concern/Recommendation
Water Access	1. A verbal agreement – does this really exist anymore? Would the DPHI or
Licence (WAL) 36029 –	EnergyCo enter into a "verbal agreement" with a landowner? A verbal
	agreement cannot be constituted as a legal agreement at this integral
entitlement 420	stage of assessment. A formal, legal agreement must be in place prior to
units or	approval. Banks don't grant loans on promises, Councils don't grant DA's
420ML/year.	based on promises, the DPHI and IPC shouldn't grant approval based on
Refer to letter to Stephen Barry from	promises.
DPHI – Page 1,2	2. If the estimated water required by Neoen for construction is 80-100ML,
	why would it be necessary to come to an agreement on an "assignment
	of unregulated water allocation"?
Biodiversity	I believe, insufficient planning has been conducted by Neoen. To "commit" to
Management	designing and implementing the necessary mitigation measure relating to
Plan (BMP) Refer	impacts on fauna, clearly demonstrates that Neoen does not have any of the
to letter to Stephen	necessary detail about the possible impacts nor would have sufficient detail on
Barry from DPHI –	possible mitigation measures at this point. How can Neoen possibly anticipate
Page 2	the impacts on the Bell's Turtle, without having this detailed assessment and
	plan completed?
	"The Department considers that the project is not anticipated to
	significantly impact on Bell's Turtle."
	How can the DPHI possibly consider this, when there is no BMP completed and
	in place?
	Who determines exactly what a "significant impact" is and how is it
	measured? As a community member, I would like to understand what a low,
	moderate or high impact actually looks like, to know whether avoiding
	significant impact categorisation is even measurable and acceptable, or not?
	Wouldn't the IPC like to understand this fully too?
Protection of the	Noting the "strict liability offence to pollute any waters off the site" is not
Environment	sufficiently demonstrating the ways in which Neoen will construct and manage
Operations Act	the project mitigation measures in regard to erosion and sediment control and
1997 Refer to letter	management. Are the mitigation measures and implementation plan's clearly
	and transparently presented to both Community and the IPC in a way that all



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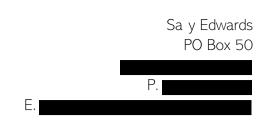
to Stephen Barry	can be confident in their efficiency and likely success and not just accept that
from DPHI – Page 2	Neoen and DPHI note that it is an offence to pollute waters?
Firefighting	1. The DPHI states that they consulted extensively with "various State
Operations Refer to letter to Stephen Barry from DPHI – Page 3	agencies, including the NSW Rural Fire Service".
	What other relevant state agencies were consulted with? Why were no
	peak body, representative or independent organisations consulted with?
	Eg. Aerial Application Association of Australia or Australasian Fire and
	Emergency Services Authority Council? Is it because only government
	agencies could be relied upon to provide the desired "perspective" in this
	instance? What would the perspective of the pilots and their
	representative organisations be about the risks of flying among turbines
	(even if they are turned off and in the "Y" position) and transmission
	lines? What is the primary cause of small aircraft incidents and pilot
	deaths? How many pilots in Australia and around the world have died
	from hitting a wind turbine or transmission line? Does this known and
	increased risk ultimately limit the ability of aerial firefighting in bushfire
	situations? I can't see how it wouldn't. Without aerial support its
	impossible that it won't increase the safety risk on ground crews and also
	decrease their ability to bring a smaller fire under control quickly and
	effectively. Will volunteer ground crews hesitate or refuse to attend fires
	of substantial risk, where they can be assured there will be NO available
	aerial support?
	2. A comprehensive Emergency Plan is a recommended condition put on
	this project. Why is it that the comprehensive Emergency Plan isn't
	required to be finalised before approval? It would be collaborative and
	supportive of the impacted community and landowners that these
	important management documents formed part of the public exhibition
	process and ultimately the assessment process. While "the detailed
	procedures" are a recommended condition of consent, the fact that there
	is no detail to adequately consider at this point in time should prevent
	approval of the project. These are important details.
	3. RFS recommendation of a provision of a 20,000L water tank on site. First
	of all: 20,000L, why is this a stock standard recommendation when
	projects are of varying sizes, varying infrastructure and varying
	environments? How will the tank be filled? How long does 20,000L last in
	the event of fire trucks utilising this water in a bush fire? Would it



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	sufficiently extinguish a structural fire of reasonable size? Why is this
	information not important? In my experience as a volunteer, I believe
	20,000L might be useful for one unit attending a small grassfire in
	favourable conditions but would be of little to no benefit for multiple units
	in less than favourable conditions or where infrastructure or lives are
	under threat. In the event of a fire, all water access is critical to
	acknowledge, but the fact that this recommended water storage provision
	does not consider size of project land footprint, type of environment or
	the nature and quantity of the infrastructure at risk, does clearly tell me
	that this "one-size-fits-all" quantity for provision can and will be
	insufficient. In my opinion, this is a poor recommendation for a
	substantial risk.
Accommodation	The answer to question 3 re accommodation (f) from the DPHI is ambiguous and
Refer to letter to	doesn't sufficiently answer the question. The Department failed to acknowledge
Stephen Barry from	their "awareness of any policies, strategies or guidance available in relation
DPHI – Page 4	to managing accommodation impacts". It would seem, that is because there
	are none - no policies, strategies or guidance available to help projects mitigate
	any cumulative impacts, and in this case, accommodation impacts.
	Developing and finalising the Accommodation and Employment Strategy for the
	project, AFTER its approval, is neither fair nor transparent. If the proponent had
	sufficiently involved or collaborated with both Council and Community regarding
	accommodation, these planning details would be available for the Department,
	the Public and the IPC and would assist with the project's approval.
Voluntary	1. If Tamworth Regional Council doesn't enter into a VPA and as such, the
Planning	applicant is forced to make a payment of \$2,242,200 in accordance with
Agreement (VPA) Refer to letter to Stephen Barry from DPHI – Page 4,5,6	Section 7.12 of the EP&A Act, is there a lesser degree of accountability for
	Council compared to a VPA? Would there be any additional losses or
	impacts on community by Council receiving the funds in this way?
	2. Where the administrator of the Community Benefit Fund is named as
	being the "Community Enterprise Foundation" – what was the selection
	process for this Administration body to be successfully chosen? Was this
	consulted with community or was this a decision made by the Applicant.
	3. It is noted a couple of times that "33% of its portion of the Contribution
	must be spent in and to the benefit of the immediate community."
	While I appreciate that the immediately impacted community does
	receive majority of the benefits of any fund for this purpose. Where did the
	quantity of 33% come from and how was it decided? How is the remaining
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67% apportioned? Where is this detailed? Was this decision reached
through conversation with Council and Community? Where is the
evidence of this consultation. This is an extremely important figure and if
this "33%" is utilised in the conditions of consent, it must be a figure that
is widely supported and understood by Community and by Council.

Thank you for the opportunity to provide further feedback regarding this project.