



HEIDI MCELNEA	COMMENT	Submission No: 165761
Organisation: <i>Community Power Agency</i>	Key issues: <i>Energy Transition, Biodiversity, Social and economic</i>	
Location: <i>New South Wales 2365</i>		
Submitter Type: <i>None of the above apply to me OR I am making a submission in relation to advice the Commission has been asked to provide</i>		
Attachment: <i>Thunderbolt Wind Farm (1).docx</i>		

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Thunderbolt Wind Farm

Submission to IPC

Ref: <https://www.planningportal.nsw.gov.au/major-projects/projects/thunderbolt-wind-farm>

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-10807896%2120220316T061307.680%20GMT>

Submissions deadline: 25 Mar 2024

<https://www.ipcn.nsw.gov.au/cases/2024/02/thunderbolt-wind-farm>

Dear Professor Menzies,

We need renewable energy projects to power our grid as coal-fired power stations are retired.

We need also to incentivise best practice, and guard against project development that does not adequately protect people, culture and environment.

The IPC is in a position where it can help align this project with the needs of the community and environment.

As developers, as planning professionals, as community leaders, our collective role is to ensure these projects are designed and implemented according to best practice. Open communication is essential to making this happen, and a condition to support an ongoing relationship between the developer/operator and stakeholders - particularly host communities - is recommended.

The conditions you determine as the panel reviews the development application by Neoen, and the submissions, will help to set up the Thunderbolt Wind Farm as an example of sustainable renewable energy development. This is especially important given it is the first of multiple wind developments proposed for the southern New England region, and the first stage of a 2 stage development. .

Environment and biodiversity

The conditions the IPC places on this development should emphasise the importance of the developer and operator to be responsible stewards of the project site, in regards to biodiversity.

The subject site has been logged and grazed extensively. The remaining native vegetation is highly valuable from a biodiversity perspective. Therefore, all remaining native vegetation, particularly that of moderate (or better) condition should absolutely be retained wherever possible, even if this means a reduction in turbine numbers or altering the routes of tracks and other infrastructure. As the first wind farm to be approved in the area, it needs to be recognised that a loss of vegetation on this project site will be repeated on other renewable



energy sites in the region. While the EIS suggests micro-siting of infrastructure to reduce impact on habitat, there needs to be an approval condition which results in a smaller disturbance than that currently identified.

To address cumulative impacts on biodiversity, the proponent should work with local ecologists, Landcare and other natural resource management groups, neighbours and host communities to design the project for a net gain in biodiversity, and the IPC could place a condition on the project to reflect this.

A net gain in biodiversity is consistent with the sustainable principles behind renewable energy, Carbon emissions can be minimised with both the clean energy generated, and the carbon sequestered on-site.

The UK has recently passed net gain biodiversity legislation. Our own Environmental Biodiversity Protection Act is currently being overhauled, having not provided sufficient environmental protection in its earlier form. The Thunderbolt Wind Farm ought to be approved to be consistent with an EBPA that calls for tighter environmental protections. It is prudent then to approve this project with stringent conditions as are likely to be required by the time the project is constructed.

These should include:

Retention of all moderate or better vegetation, in particular endangered ecological communities;

Riparian revegetation of the four streams identified, gullies and wetland areas;

On-site revegetation targeted to create additional habitat and connectivity for local species;

Biodiversity credits to be used on-site, on adjacent properties and in the Eastern Nandewar subregion on the New Englands Tableland.

An objective of the Environmental and Planning Assessment Act is to encourage ecologically sustainable development (ESD) within NSW. As quoted in the document's Environmental Impact Statement, the project should be assessed in relation to Ecologically Sustainable Development.

An excerpt from the EIS:

To justify the Project with regard to the principles of ESD, the benefits of the Project in an environmental and socio-economic context should outweigh any negative impacts. The principles of ESD encompass the following:

• the precautionary principle

• inter-generational equity

• conservation of biological diversity

• valuation and pricing of resources.

Essentially, ESD requires that current and future generations should live in an environment that is of the same or improved quality than the one that is inherited.

I ask that you can consider how to embed these principles in any conditions IPC can apply to the project approval.

Community benefits and liaison

Appendix 6, the Community Relations Plan, indicates that communities have responded and suggested a number of benefits that they would like to see from the project to ensure that communities benefit from hosting the project, and to help support the resilience and development of the Kentucky and surrounding communities.

Appendix 6 lists the potential benefits identified as:



grants for local community groups

discounted electricity bills for local households

Solar and/or battery storage subsidies for local households

An opportunity for community members to invest directly in the project

Biodiversity funding & opportunities

Explore ways to support local ecotourism

Community Future Fund

Ambulance station for improved outcomes for the community

Sponsorship of the local show

Profit sharing in wind turbines that impact neighbours

Telecommunications improvement, including improved mobile phone signal and internet coverage

Funding for Kentucky Hall, School and fire brigade

RFS training on roads within wind farm

Educational scholarships, traineeships, cadetships, trade skills

Making the wind farm partially community-owned

Indoor sports centre

Energy efficiency program and support for low income households

Help local shires to prosper

With the discussion that has taken place between councils looking to coordinate benefits as part of a Voluntary Planning Agreement, or as a fund through Bendigo Bank, what governance model will they use to design and implement some of these ideas? Could the IPC indicate sufficient, transparent and continual involvement of community representatives in the development of programs and allocation of resources. We strongly recommend that Neoen work with local community representatives to co-design an appropriate ongoing governance model that ensures local people have a voice in decision making.

We also note the importance for benefit sharing to occur alongside quality, ongoing engagement that is founded in strong relationships and trust.

Accommodation, procurement and housing

It is good news that, as per the Department of Planning Recommendations, that “the project would generate direct and indirect benefits to the local community, including: “ up to 285 construction jobs, of which Neoen has committed to sourcing 135 from surrounding LGAs.”

And to recommend: “a condition requiring Neoen to prepare an Accommodation and Employment Strategy to prioritise local employment and procurement, and to mitigate the potential impacts of worker housing unavailability.” However the recommendation should be enlarged to say that the Strategy be prepared with the range of stakeholders in the space (community housing, training and education providers, support services etc) along with Councils. It is also imperative that the Accommodation and Employment strategy considers the cumulative impacts from other major projects occurring concurrently in the region. We encourage an approach



that works with local stakeholders to problem solve mutually beneficial solutions that have the long term interests of the community at heart.

From the EIS:

the Project will support increased/new revenues for accommodation providers and private homeowners over the construction phase, particularly in off-peak seasons and there is sufficient capacity in the region to support the Project.

And:

The Study Area currently contains significant accommodation (1,890 rooms and cabins)

With many of these rooms and cabins already in use, it will be prudent that Neoen works with local communities, councils, accommodation providers and other entities to begin a plan for accommodation as a priority, so that homelessness and outmigration due to increased short term housing processes and poverty is not increased, and that the proponent's EPC can house staff as required.

In conclusion

We ask that the IPC considers embedding requirements for community participation across its workforce, procurement, accommodation and community benefit planning. We ask that the project develops a Biodiversity Strategy that results in a net gain for biodiversity, and that the developers are incentivised to strive for best practice, being the first of multiple wind developments proposed for the region, and the first stage of a 2 stage development.

Kind regards,

Heidi McElnea

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