



SALLY EDWARDS

OBJECT

Submission No: 165744

Organisation:		Key issues: <i>Energy Transition, Social and economic</i>
Location: <i>New South Wales 2843</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>Sally Edwards_Thunderbolts WF SUBMISSION March24.pdf</i>		

Submission date: 3/25/2024 4:13:08 PM

5 page submission attached as a PDF, if any problems are had with viewing, please contact me. Thank you.

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Thank you to the Chair and the Panel of Commissioners for accepting all submissions. I am grateful for this opportunity, and I intend to share my experiences and knowledge of small rural communities and my concerns about the Thunderbolt project and the impacts and opportunities it presents to the landscapes and residents of Kentucky.

BACKGROUND

My name is Sally Edwards, I live on a farm, near Coolah, with my husband and teenage kids.

Kentucky is not unlike many small rural communities across Australia and it is my connection with and my deep care for small rural communities that prompts me to make my submission.

Firstly, having grown up on a dairy farm, married into a 4th generation beef cattle family and now a farm owner myself, I cannot accept or contribute to wider community acceptance that Solar and Wind Energy Generation projects be called “farms”. It is simply not true. Farms produce and grow plants and animals for the purpose of food and fibre and they work in symbiosis with the environment and weather.

Secondly, our home and farm is completely off-grid, we utilise diesel and unleaded to power vehicles and farm machinery, we use solar and battery storage to provide our electricity which powers our home, sheds and farm water supply. I see value in renewable energy generation when used in situations where it is balanced and unequivocally fit-for-purpose. In my opinion, the design of Australia’s “rapid transition”, that this project finds itself a part of, is neither balanced, nor fit-for-purpose.

I consider myself an environmental advocate where balance, practicality and cost benefit consideration are important factors when looking at sustainable ways to preserve our environment and ultimately save the planet.

PROFESIONAL CAPACITY

I have spent the last 15 years working as a Community Development Coordinator, with a number of Non-Government Organisations in the Warrumbungle Region. A lot of this work had me working alongside both State and Local Government, fundraising, and sourcing and attracting funding to achieve community projects, initiatives and aims.

I have come to learn, respect and in many cases value the very foundational principals of community development, of small-town revitalisation and the associated governing criteria of many funding programs. This understanding indicates to me, that the manner in which projects such as Engie’s project are proposed, funded, consulted, planned and eventually delivered, goes against the very foundation of sustainable rural community development.

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It is this foundation that I wish to demonstrate that the Thunderbolt Project, while on the surface appears to provide opportunities for Kentucky, particularly economic, will in fact be a continued significant cause, of loss of community character, loss of economic control and ownership, and most importantly loss of community connection and cohesion.

An important foundation I wish to highlight is “NEED”. To successfully deliver a community project or initiative, you MUST adequately demonstrate and evidence that the Community has a real, recognised and even measured NEED of the project.

The NEED for this project, is not a local community NEED, it appears to me to be a purely commercial need ultimately driven by a National NEED, the need for new Energy Generation and also a global NEED towards NET ZERO. Due to this – the location selection was identified through a purely commercial process, exclusively without the involvement of the Kentucky community and initially WITHOUT the community’s consent, it only required the land host’s consent. This is what I know to be a “top-down” model of development, where a project is developed with no active involvement or ownership by a community.

Currently, our government has identified these NEEDS, without the involvement of the Australian people, and through the Renewable Energy Electricity Act 2000 and the declaration of Renewable Energy Zones, has encouraged and promoted commercial interest by large corporations. Many of which are foreign owned or government owned, and propose, to plan and build these Industrial Energy Generation projects.

Hypothetically - IF the National NEED was indeed identified and supported by majority of the Australian people, to develop new and renewable energy generation sources... imagine if our government were to encourage and potentially fund localised, community owned energy generation projects across the country, to allow communities, suburbs, industries (like mining) to develop their own Energy generation sources and storage if needed, at the same time contributing any excess into the grid. This would (a) boost local economies, (b) provide community ownership, control and energy sustainability and (c) contribute to a successful national energy transition. Imagine if these localised Energy Generation projects incorporated diverse energy generation practices and at a local level, significantly reduced energy prices and provided valuable security for base-load power. Power rationing would likely not be a challenge our communities would have to face in the future.

In understanding rural economies, I acknowledge I have a shared belief and wish, with all those that support the Thunderbolt Project AND with those who object, and that is to see the Kentucky community grow and flourish. Wanting a thriving community and a boost to the economy is part and parcel of loving your community, you want to see your community grow and to do that you need support for goods and services.

Through this assessment process you will consider many, many concerns – concerns around loss and displacement of wildlife and loss of native vegetation, construction disruption, water usage and



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consumption, loss of landscape and visual amenity, increased fire risks, loss of aerial fire-fighting capabilities, pressure on already struggling public services eg, accommodation, health and education and the employment battle – what industries will find it impossible to compete? Agriculture or tourism?

The concern that I have and that I am most equipped to consider, is the already significant loss to Kentucky in the loss of community connection and cohesion. This loss, this division, will inhibit the Kentucky and Uralla community’s ability to manage through the disruption and interruptions of construction. Through the physical changes to the environment - emotions will be high, when animals are displaced - emotions will be high, when roads are blocked and traffic issues arise -emotions will be high, when there are unexpected challenges or outcomes - emotions will be high. Throughout this time, the community will be called to support each other. If the community remains fractured, it cannot possibly face these challenges together successfully.

CONCLUSION

I urge the IPC to not grant approval to this project, based on the obvious community divide as evidenced in person at the Public Meeting and in the submissions made to the DPHI Major Projects Portal. NEOEN must be asked to address this division – they must put solutions on the table to repair the damage that has occurred in this previously connected, caring and active community. The project shouldn’t be approved, until it can evidence whole of community support. Otherwise, the division will only grow, and the capacity and capability of the whole community, will continue to decline.

There should be robust collaborative discussion INVOLVING all community members as to what could constitute a project that the whole community embraces and supports. What would that look like? What type of project would that be? What places would need to be avoided, what places are acceptable? I would suggest this would start with discussion around a significant level of community ownership and significant reduction in local energy costs. The Community Enhancement Fund proposed is merely an international hand reaching out with a small bucket of money at the cost of Kentucky’s community cohesion, their landscapes and environment and their future sustainability. Commissioners, this is not the answer for a sustainable and thriving Kentucky.

NEOEN claim to have adopted the IAP2 Public Participation Spectrum, which is a sound and internationally recognised framework for public participation. This framework guides projects through the most appropriate ways for the public to participate in any project and in proportion to the significance of the project.

NEOEN’s EIS and in particular Appendix 6, Community Relations Plan (pages 7 and Table 16 pg 58) clearly FAILS to demonstrate ANY possible way that NEOEN intended to either INVOLVE or COLLABORATE with the project community. Listing only ways they were to INFORM and CONSULT and then skipped over the INVOLVE and COLLABORATE steps and went straight to EMPOWER which NEOEN claimed the Benefit Sharing Program achieved.

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NEOEN's failure to either INVOLVE or COLLABORATE is clearly demonstrated through the many public objections received and through the public presentations and submissions, to you the IPC Commissioners. It is my professional belief, that skipping these two crucial steps of the IAP2 framework is what results in this loss of community cohesion and creation of community division.

There is no evidenced Social Licence for the Thunderbolt project.

I believe that this deliberate breach of the IAP2 framework has not been adequately addressed by the DPHI in their Assessment Report and as such now requires the IPC to acknowledge this in its determination and due to ineffective and destructive consultation practices by NEOEN and no demonstrated Social Licence, now leaves the IPC no other option but to not grant approval.

References to evidence presented by the DPHI in the Thunderbolt Assessment Report Feb 2024

- **Page 12 – 5.2.1, 49**
 - Applicant's consultation with the community were a basis of Objection submissions
- **Page 13 – 5.2.1, 53 (see graph)**
 - In the **top 3** of the Key Issues raised in public objections, was "Applicant Consultation"
- **Page 13 – 5.2.2, 55**
 - Queries regarding consultation were raised in the Submissions in Support and Comments
- **Page 14 – Table 5**
 - Lack of social licence and poor community engagement
- **Page 70 – Appendix I – Consideration of Community views**
 - This table does not address NEOEN's failure to INVOLVE or COLLABORATE with the community, nor due to NEOEN's destructive consultation practices the loss of community cohesion and creation of community division. It also does not address the lack of any social licence for this project.

Important Items of consideration NOT presented by the DPHI in the Thunderbolt Assessment Report Feb 2024

- **EP&A Act – Division 2.6 Community Participation**
 - The breach of division 2.6 of the EP&A Act presents clear to me and remains unaddressed. The applicant HAS NOT presented a project in accordance with this section of the EP&A Act. This is clearly displayed in the applicants Community Relations Plan and subsequent and sufficient evidence of this has been presented to the IPC panel.
- **EP&A Act – Division 5.2 State Significant Infrastructure**

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- **Quoted from Division 5.2** “it is important to **ensure** that the level of community engagement and assessment required for each project is proportionate to the scale and impacts of the project”.
- The evidence as displayed in the DPHI Assessment Report and directly to you as Commissioners through this assessment process of insufficient and destructive Community Consultation practices by the applicant as evidenced substantially by the community, is also in clear breach of Division 5.2 and of the Undertaking Engagement Guideline for State Significant Infrastructure and the associated Community Participation objectives, which also clearly requires transparency and fairness.

I urge the panel to refer to the EP&A Act and the Undertaking Engagement Guideline for State Significant Infrastructure when deliberating these items.

I believe the DPHI have failed to **ENSURE** that the community engagement and community participation has been sufficient and as such it leaves you, the IPC Panel to address this important factor when deliberating the merits of the assessment and associated conditions?

How do you pose conditions on a project, when what needs to be fixed, is what has already occurred? I don't believe you can? The only option to me, is to deny approval based on this fact.