

30 April 2024



**EnergyAustralia**  
LIGHT THE WAY

Mr Steve O'Donoghue  
Director, Resource Assessments  
NSW Department of Planning, Housing and Infrastructure

Via email

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Dear Mr O'Donoghue,

**RE: Tallawarra B Power Station PVMP and Aviation Mitigations - request for time extension**

Thank you for your email of 29 April 2024 regarding the conditional approval of the Aviation Impact Assessment and associated information provided to satisfy condition 1.6 of the Project Approval 07\_0124.

EnergyAustralia continues to remain committed to aviation safety and implementing the appropriate risk mitigation measures.

Since we last met with DPHI and CASA we have made further progress on in-atmosphere monitoring as follows:

- tested CASA's concern as to potential impact of inversion layers on LIDAR. LIDAR provider has confirmed they expect to be able to make accurate measurements despite any inversion layers;
- further progressed commercial arrangements with both LIDAR and fly-through providers ready for a final decision;
- held meeting to discuss aviation mitigations with Shellharbour Airport management and Shellharbour Council officers 17/4;
- held meeting aviation mitigations with airport management and operators 29/4.
- completed a risk assessment that confirms the fly-through is within EnergyAustralia risk tolerance.

The meeting with Shellharbour Airport management and Shellharbour Council officers was productive. Airport manager made the point that continuous flying over the station may lead to noise complaints and the importance of following the airport's "fly neighbourly" policy. At the subsequent meeting with pilots he suggested a letter box drop to advise neighbours.

The meeting with the airport operators was extremely constructive. It was well attended with five pilots all of whom have previously raised concerns with Project and three airport personnel. The pilots:

- recognised the value of incorporating in-air measurement with significant light aircraft flying in the plume;

- agreed that this solution, provided results were shared transparently would put an end to the argument over whether or not the CASA limit of 6.1m/s and approach to averaging based on gaussian plume were reasonable and safe;
- agreed the speed of flight for data gathering was representative of a typical light aircraft taking off or landing;
- noted the importance of weather conditions and that the worst-case conditions may be hard to find in later stages of winter as the westerlies set in;
- raised questions about the suitability of a defined "missed approach" operation and agreed that provided plume was less than 6.1m/s and the Cessna operations had shown turbulence to be within parameters there was no need for change;
- requested after data gathering is complete we carry out a defined take-off manoeuvre at maximum take-off weight;
- requested a debrief with contractor upon completion of testing;
- agreed that defining a restricted flying area / display box was appropriate and offered logistical support with comms if required.

The AFRU was also discussed at both Airport, and Airport user meetings and the Airport Manager stated on both occasions that they are happy with the planned approach to harvest AEMO data and that all action is with Airport. One pilot questioned why a microwave solution was not selected and this was briefly discussed.

As a result of the above EnergyAustralia is proceeding with the fly-through solution for in-atmosphere monitoring subject only to finalisation of internal procurement and approval processes. We will advise when we have placed the contract and have a concrete timeline for the work.

I trust the above is sufficient support for EnergyAustralia's extension of time request. Please contact me if you have any questions.

Yours sincerely,

**Ian Black**



Tallawarra B Project Director

Encl.