

The Department of Planning and Environment
320 Pitt Street, Sydney NSW 2000
4 April 2017

Dear Sir/Madam,

I refer to:

1. - Dalton Power Project (DPP) – AGL application to extend Lapse Date from 19 July 2017 for a further two (2) years (MOD 1) and
2. - AGL stated intention to use that time to enable them to lodge a more substantive project approval modification (MOD 2).

I object strenuously to the approval of any extension to the DPP lapse date of 19 July 2017 and provide the basis of my objections below.

- **Legal framework**

1. AGL state that their application is made under s75W of Part 3A of the EP&A Act (preserved under Schedule 6A to the EP&A Act) to extend the lapse date for a further two years (MOD 1).
2. The current DPP approval was made under now defunct and superceded legislation.
3. Given that AGL's stated intention is to use this additional time (extending the lapse date to 19 July 2019) to prepare a more substantive project approval modification (MOD 2), this appears to be an abuse of the scope of s75W for a major project.
4. The Dalton Power Project (DPP) is for the construction of a 1000mW gas-fired power station within the immediate environs and precincts of the village of Dalton, and with major impacts on a number of other local communities including Gunning.
5. The lapse date should stay at 19 July 2017 and any substantive modification to the current approval should be made under the full requirements of the new planning legislation and approvals framework and environmental assessment requirements.

- **AGL state 'Importance of the Project - change in market conditions'**

6. AGL state that the DPP will contribute to ensuring adequate, reliable and consistent supply of electricity during times of peak demand in NSW, and help to keep downward pressure on price.
7. The construction of the DPP would be unlikely to provide any consistency of supply of electricity into the NSW grid at any time in the next few years, and in that period gas is likely to be out-paced and superceded by other more consistent (and significantly cheaper) forms of power such as through the dramatically escalating uptake of solar, wind and battery storage technology.
8. Gas-fired power has consistently out-priced itself in the electricity market as evidenced by the failure to turn on gas-fired power generation during the recent power shortages in SA.
9. The price of gas is likely to further rise dramatically in the near future as Australian gas is sold overseas.

- **AGL state 'Improved efficiency, flexibility and greater community consultation'**

10. AGL state that extending the lapse date will allow adequate time for AGL to review and update the DPP in line with current technology and energy market circumstances and that they seek to be a trusted and respected member of the communities in which they operate.
11. AGL are in a position to consider and review current technology and energy requirements on a daily basis without the extension of the lapse date on the DPP approval.
12. AGL's ideas on community engagement are starkly evident from their disregard of the valid objections and submissions of local residents during the original EA process.

- **AGL state 'Increased private sector investment consistent with government policy' and 'Socio-economic benefits'**

13. AGL state that higher electricity prices are a risk to economic growth and create hardship for parts of the community. They also state that the DPP will generate significant economic benefits.
14. Gas-fired power has consistently out-priced itself in the electricity market as evidenced by the failure to turn on gas-fired power generation during the recent power shortages in SA.
15. The only significant economic benefits from construction of the DPP would accrue directly to AGL from sale of high priced power, driving electricity bills even higher, which will directly impact on poorer members of the community.
16. The main direct impacts of construction and operation of the DPP will be on the school children of Dalton from the dramatic increase in noise and vibrations and its effects on learning; and the effects of its pollution on their respiratory and long-term health outcomes. The DPP as proposed has a lifespan of 30-40 years – what will be the incidence of childhood asthma and adult cancers during its lifetime? This is the high price that we as a community cannot afford.

- **AGL state 'No change to scope as a result of extending the lapse date' and 'Changes to the surrounding environment.'**

17. AGL state that there is no change to the scope of the DPP as a result of MOD 1. However they concede that delay to the DPP results in ongoing uncertainty for the local community.
18. The past 7-8 years have been a period of severe disruption and uncertainty for the citizens of Dalton and the surrounding communities, arising directly from the intransigence of AGL to consider the impacts on this town and surrounds.
19. AGL were only prepared to amend the original EA and provide updated estimations of noise, environmental impacts and other factors when they were forced to do by various submissions and by the Department of Planning.
20. AGL's disregard for local aboriginal culture was evident by their original EA claim that no evidence of aboriginal sites was found. The Lachlan River which traverses their project site is well-known for routine discovery of aboriginal artefacts to the present day. The potential from a large impact project as proposed, for destruction of artefacts and cultural sites, cannot be underestimated.

3.

- **Impact of DPP on my surrounding environment and my community.**

21. I own and live on a small rural holding within the village where I graze a few sheep and grow my own organic vegetables and fruit. My home sits at elevation facing due North in direct line of sight of the AGL project. If the power station was to go ahead, the view from my front verandah and yard will be dominated by the turbines and stack, and my 100 year-old windows will rattle from the vibrations when it is running.
22. I love the warm Summer evenings in Dalton watching the sun go down and a late shower washing the hills over the Lachlan River. I love the foggy crisp mornings in Winter with the sounds of carolling birds, and frogs going crazy when the rain comes down at any time of the year. Are all these to be replaced by dank, smelly smog, the roar of jet-sized turbines and spewing stacks of gaseous pollutants?
23. My engagement with the local community comprises respect for the local environment, animals and birds, planting trees and cooperation in local community activities. I have seen the impact of the AGL project on community unity and cohesion, and after eight years in limbo we are now united in opposition to this blight on our landscape.

- **Conclusions.**

24. AGL has not justified any extension to the lapse date based on any valid consideration or on their past or present performance on meeting basic EA requirements.
25. AGL has not proved that they can be a good corporate citizen. Their recent fine for non-declaration of political donations is evident proof of this fact.
26. AGL has not demonstrated any community responsiveness to the valid concerns of the residents of Dalton and simply ridden roughshod over our objections to the proximity of the DPP within our town.

Submission

I request the Department of Planning consider my submissions above and consider the significant impacts on the Dalton community, its surrounding communities and the environment, of any extension to AGL's lapse date of 19 July 2017 for the DPP.

I request and implore the Department of Planning to refuse the MOD 1 application.

Yours sincerely

Pat Robinson

Dalton NSW 2581