

SUBMISSION OF OBJECTION TO AGL MODIFICATION APPLICATION FOR AN EXTENSION OF TIME TO THE LAPSE DATE OF THE CONDITIONAL APPROVAL OF THE DALTON POWER PROJECT

I, **Margarita Georgiadis** of 82 Yass Street GUNNING, do hereby submit my **OBJECTION** to the application by AGL to have the lapse date of the conditional approval they received in 2012 with respect to the **Dalton Power Project (DPP)**, extended by 2 years.

I have been a resident of Gunning for 14 years. I am the owner of four retail shops in Yass Street, one of these retail premises I manage and operate with my husband, Max Cullen; **The Picture House Gallery & Bookshop**. Three of the retail shops I own are leased to successful businesses, **The Gunning Butcher Shop, The Gunning Paper Shop** and **Creative Gunning**.

As a business owner, resident and retail shop manager of Gunning, I object to AGL's two year extension proposal for the following reasons:

• LACK OF COMMUNITY CONSULTATION

- It is my understanding that AGL have failed to uphold conditional approval of the DPP by their complete lack of community consultation. AGL have not been in contact with our community over the 5 year period they shelved this project, therefore, they have not satisfied this consent condition.
- As a business owner and resident of Gunning, a staunch objector to the original proposal in 2012, and having given a presentation before the Planning and Assessment Committee, I was not contacted by AGL regarding their extension of time proposal at all. I received nothing via mail or a telephone call.
- It is clearly evident that AGL deliberately chose to keep their ambush proposal from the community and I believe this is a major breach of their consent condition and conduct as a corporate citizen.

• LACK OF TRANSPARENCY

- At AGL's one and only Community Consultation Meeting regarding this extension of time modification application held on 5 April 2017, AGL representatives refused to adequately answer community questions and concerns with respect to 'what' their MOD 2 application will be. We were told despite their wishes to 'extend' this modification application on the approval of the Dalton Power Project, MOD 2 might not even be a gas fired power station.
- How can AGL apply for an extension of time 'modification, based on 7 year old outdated data of the Dalton Power Station, but not be willing or able to inform the community what that extension will entail.
- If AGL wish to propose a new project, we demand they prepare a new proposal with a new EA.
- This lack of transparency is a breach of conduct and community consultation.
- This extension request of the 'unknown' is absurd and cannot constitute a legitimate trustworthy proposal to the region that is expected to agree and live with it or within the system that is responsible for assessing it.

• **SOCIO-ECONOMIC IMPACT**

- AGL claim nothing has changed with respect to the socio economic impacts of their original proposal upon our community.
- As a business owner and landlady, I can testify, that there has been a great deal of change within our communities. New successful business have opened attracting tourists to the region and increasing local employment.
- Cafe's in Gunning report their patronage has more than doubled over the past five years.
- There is an increase in local employment due to the demand for new business to service the local community which has and continues to expand.
- There is an increase in businesses increasing local employment due to the demand of greater numbers of tourists visiting our towns.
- The shadow of the DPP casts a great deal of uncertainty for these new businesses. There is already a negative impact created by this uncertainty.
- The DPP and this MOD 1/MOD 2 extension of time modification diametrically opposes the Upper Lachlan Shire's regional strategic plan for growth and development (2016).
- There is NO EVIDENCE of socio economic benefit by the DPP other than a hollow statement by AGL representatives of the possibility of a few temporary jobs.
- Over the 5 years AGL have shelved the DPP and made no effort to consult our community, we have the addition of the following businesses and services none of which were contacted with regard to this extension of time modification proposal.

- **Gunning Pharmacy**
- **Gunning Community Care**
- **Nurse, Physiotherapy & Health Care Services**
- **Gunning Butcher Shop**
- **Gunning Paper Shop**
- **Creative Gunning**
- **Gunning Nearly Antiques**
- **Two Secondhand Bric-a-brac Shops**

• **IMPACT ON TOURISM / INADEQUATE TRAFFIC MANAGEMENT PLAN**

- AGL claim nothing has changed with respect to their now inadequate and outdated traffic management plan.
- As stated above, the socio economic fabric of our communities have changed a great deal. We have a greater volume of commuters into Gunning and surrounding areas due to a higher influx of tourists, new businesses opening and local employees.
- There has been an increase in residents to Gunning and Dalton over the past five years, therefore a greater number of commuters from Gunning and Dalton to Canberra and surrounding major towns.
- The increase in grey nomads traveling through our towns will significantly alter AGL's inadequate original traffic management plan and run the risk of our region losing their interest in visiting our towns.
- AGL representatives mentioned at their Community Consultation Meeting on 5 April 2017, the possible need for LPG to be trucked to the DPP should their proposal be accepted. This will significantly increase construction and ongoing traffic conditions through Gunning and Dalton, affecting businesses, safety and peaceful amenity of our towns and trade.
- Please refer to below original concerns regarding Traffic Management Plan that will now be outdated and of even greater concern:

- The volume of traffic predicted in the Environmental Assessment (EA) for the proposed Dalton Power Project is enormous. The traffic route maps in the Transport Management Plan (TMP), combined with the predicted traffic movements in the EA, clearly show that Gunning residents and businesses – and all those who use the Gunning-Dalton Rd – will be seriously affected during the projected two years of construction for **each** of the two stages of the proposed development.
- Further, there will be ongoing traffic issues for the community during the periods of major maintenance, which are expected to happen every three years, and last for 6 weeks. These maintenance periods involve even greater traffic volumes than those estimated during peak construction.
- There has been a complete lack of community consultation by both AGL/URS and the ULSC about traffic impacts of the power station. This means that the genuine concerns of the communities of Gunning and Dalton have not even been identified, let alone considered and incorporated into the TMP.

Lack of consultation about the Transport Management Plan

The TMP has been developed without adequate consultation with the local community. Despite being required to do so by the Department of Planning and Infrastructure's *Guidelines for Major Project Community Consultation*, AGL has failed to consult with "those directly impacted by the project (e.g. Neighbouring residents or those located on transport corridors affected by road or rail transport associated with the project)" (Guidelines p.3).

- The TMP forms part of the *Construction Environmental Management Plan* (CEMP). The CEMP is supposed to ensure that the "environmental risks", including traffic impacts, associated with a project are properly managed. The lack of consultation means that these risks have not been identified, let alone addressed.
- Gunning businesses, past whose doors this parade of heavy vehicles will pass, were excluded from the development of the Traffic Management Plan. No input has been sought from the Gunning Early Learning Centre, the Gunning District Community and Health Service or any other section of the Gunning business community. Similarly, residents along the transport routes through Gunning and along the Gunning-Dalton Road or the residents of the Gunning and Dalton communities have been neither informed nor consulted regarding this dramatic increase in traffic and the proposed significant changes to traffic arrangements in Gunning.

• Traffic Noise

- The TMP states that traffic lights will be installed at the railway bridge at the northern end of Warrataw St in Gunning. This will result in traffic banking up along Warrataw St, affecting access to the Gunning Early Learning Centre, Grovenor St, Saxby St and residences. With peak construction traffic predicted to be 160 vehicles **per hour**, delays and inconvenience are likely to be significant. This imposition on the community will be repeated whenever there is major maintenance and during the second stage of construction.
- Significant noise will be made by trucks stopping at the traffic lights, applying park brakes and then accelerating again. The "road traffic noise" assessment in Section 5 of Appendix G of the EA states a predicted increase in noise levels of 2dB at receptor locations L – O. Figure 3-1 in Appendix G clearly shows that receptor M on Warrataw St will be directly impacted by this change in traffic conditions resulting from the installation of the traffic lights. However, the introduction of traffic lights is not considered in the EA. If trucks driving past these residences are predicted to increase noise by 2dB, it must be assumed that the stopping and starting of these vehicles will create even more noise. As it is known that larger vehicles like heavy trucks typically emit 80-85 dB, ranging up to about 90 db when pulling away from a stop, it is difficult to understand the 2dB increase predicted by URS/AGL in the EA (Transport Action, Transport Canada 2000, October 2001 as referenced by <http://www.trolleycoalition.org/noise.html>)
- The noise monitoring data also appears deficient. Data at Warrataw St was collected for 5 days from April 1 to April 5 (USR/AGL EA, Appendix G, Table 3-10, p17). However the NSW Road Noise Policy states "a minimum of seven consecutive days is preferred" p 48.
- The community requires more information on the parameters used in the noise modelling. For instance: Has the stop/start nature of the traffic been assessed? Has the change in the traffic composition with the increased amount of heavy vehicles been assessed? Have adverse weather conditions been modelled? Was Federal Highway Administration Model 2004 – the FHWA (TNM 2.5) model used? Model TNM 2.5 contains improved acoustical algorithms compared with previous versions of the model (TNM 1.0 to 2.1) (NSW Road Noise Policy 2011, p 49).

Other important matters not considered in the Transport Management Plan

- The effect of the dramatically increased traffic flows on the businesses on Yass St. The existing quiet country town feel of the Gunning village attracts significant numbers of tourists. As well as visiting car, motor cycle and cycle clubs, large numbers of short and long-term visitors frequent the local cafes, shops and Camping grounds. This rural ambience will be seriously diminished with the significant levels of construction traffic predicted. No data predicting the extent of either existing or projected traffic volumes has been provided in the EA or the TMP.
- Safety issues for local residents caused by the dramatic increase of traffic at the Yass St - Warrataw St intersection. The Gunning District Community and Health Service is located at this intersection, as is the Gunning Post Office and Bailey's Garage. Many elderly residents, as well as parents with young children and babies, use the facilities and services provided by the Health Service. The predicted peak construction traffic of an additional 140 vehicle movements per hour through this intersection presents a significant risk to these residents and school children who need to cross these roads. This is particularly relevant given the parking arrangements on the intersection. This intersection has not even been identified in the EA or the TMP.

• CONCLUSION

All of my tenants comprising of **The Gunning Butcher Shop, Creative Gunning** and **The Gunning Paper Shop**, are conducting successful new businesses in Yass Street Gunning. These businesses including our own, **The Picture House Gallery & Bookshop** have all reported an increase in trade of well over 50%. The three retail shop owners that are my tenants, have all started their businesses since AGL went quiet and disappeared from our town and lives 5 years ago.

It is clearly evident that the township of Gunning and Dalton have prospered enormously over the last five years and continue to do so. If this project is approved in whatever form it is proposed, it will have a devastating negative impact on our communities.

AGL wish to be given time to consider what project may be profitable to them, yet show absolutely no interest or concern in how their investment decisions will impact our communities, our businesses, our landscape, and our quiet and tranquil amenity and our future.

Their failure to engage with our community with any level of transparency, with an open ended proposal is an absurd request to any community wishing to plan and prosper.

This proud, industrious community, have worked tremendously hard to re-establish a healthy and prosperous rural identity worthy of attracting not only tourists, but new residents who have themselves made major investment decisions. Investment decisions that will be now placed on hold or abandoned if this time extension is approved.

It would be a great disgrace to this country, to destroy a healthy, growing region of NSW for the folly of such a disreputable corporation, with a proven track record of non-compliance and gross misconduct, not to mention convictions of non disclosure of political donations made during the DPP.

I implore The NSW Department of Planning and the NSW Government to reject this proposal on the grounds that it will contribute nothing to this region of NSW, other than the complete annihilation of our rural identity, rural industry, tourism, property values, peaceful amenity, businesses, environment and community. This project destroys any concrete commitment toward a proven, achievable renewable energy future for this country.