

Dubbo Firming Power Station IPCN Submission

I am a fifth generation farmer from Dunedoo, NSW. Whilst I live approximately 100 kilometres from the proposed Dubbo Firming Power Station I have grave concerns regarding the whole “rapid transition to renewable energy”, without which a gas powered firming station would be unnecessary. The impacts of the transition on agriculture (and therefore food security), hazard risk, traffic and transport, water, noise and visual amenity and all the foundations of rural and regional communities and landscapes is being put at risk in the name of saving the environment from climate change. Is there any sense in destroying the environment in an attempt to save it?

The people of rural and regional NSW, and Australia, who are being forced to host the vast majority of infrastructure needed to transition OUR country to renewable energy, are not being given opportunities to have their opinions and concerns heard early enough in the planning stages. There is plenty of room for real, valuable and constructive collaboration with community, but that option is being taken away through secretive, manipulative, divisive conduct from Government and developer employees.

Project Need

The project is lacking evidence and supporting research that suggests new gas-powered firming plants are more efficient than a modern coal-fired power station or a small nuclear power plant. Has this research been completed? Was it done without the Net Zero 2050 blinkers in place?

"with a view to transitioning to 100% hydrogen and biofuel systems. The Project will produce hydrogen when there is excess electricity in the grid" - The EIS does not contain sufficient planning to warrant acceptance of this "proposed transition", in fact, the EIS states on page 17 "Note: Reciprocating engines for the power station as contemplated in the Project's Scoping Report are least preferred following concept studies and technology vendor engagement and are not assessed in the EIS. These engines did not offer the ability to transition to the targeted hydrogen blends or offer biofuel compatibility in the short term."

Hazard Risks

The project is located on designated bushfire prone land. Was the local Rural Fire Service (RFS) brigade contacted for comment on the proposed project? Will all construction and operational staff be trained in fire fighting and become volunteer RFS fire fighters?

With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of pumping 280L/minute meaning 20,000L of water would be used in 71 minutes. During most grass or bushfires there are numerous fire fighting trucks and trailers used in an attempt to put the fire out in a timely manner for the obvious reasons of there being less damage done. An average call out for RFS members would see half a dozen vehicles/trucks attend – six 38mm nozzles would use 20,000L in just over 10 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 20,000L is not enough water to adequately fight even the smallest of fires in rural NSW. What is the average amount of water used at an industrial fire?

The DPHI Assessment report states that “the site is surrounded by existing industrial operations, such as Hanson’s Dubbo Concrete Batching Plant, Fletcher International Exports, Dubbo Livestock Markets and the Dubbo Sewage Treatment Plant.” How will the safety of the thousands of livestock contained within the Dubbo Livestock Markets and Fletcher International Exports paddocks and yards be guaranteed in the event of a fire or other hazardous situation? Where would the liability be placed if there were an incident killing livestock? The producer, processor, or owner of the business?

I would like to note the absence of agency advice from Fire and Rescue NSW on the Major Projects Portal. I believe an incident at an industrial complex like a firming station would more likely involve Fire and Rescue as the primary agency rather than the NSW RFS. Has Fire and Rescue NSW been contacted for comment on this proposal?

“The Department is satisfied that the project could be designed to ensure no unacceptable risk to surrounding land users from fires, explosions or toxic exposures.” What risks are deemed acceptable? And who gets to make that assumption – the local community; those who will be living closest to the plant and facing the aforementioned risks? Or is it the Department staff, who will likely never set foot near such a development once operational?

Accommodation & Social Impacts

It is noted that “the project would increase the demand for accommodation, particularly for short-term accommodation during the construction period.” The use of short term accommodation by construction workers would, no doubt, please the accommodation providers, but what does that mean for other businesses that rely on tourism, or patients and families who must travel to Dubbo for medical reasons? The Central West has many tourist attractions and small businesses that benefit from travellers stopping in the towns and cities – they simply will not stop in our towns if there is no accommodation available. Dubbo Base Hospital services most of Western NSW, and often travel for a medical situation is last minute – how can there be guaranteed accommodation for these purposes?

It is expected that some portion of the construction workforce may travel from further afield, but the Department suggests that the impacts on local services are likely to be minor. People in regional NSW are already waiting weeks, if not months, to visit a GP. The increase in population, from not only the Dubbo Firming Power Station construction, will inevitably put pressure on all local services – police, ambulance etc. There needs to be much more emphasis placed on the cumulative impacts of the CWO REZ!

The Assessment Report states that “given the project would be situated in an industrial area and traffic and amenity impacts would be minor, the Department considers that adverse social impacts would be minor and would be largely offset by contributions to Dubbo Council under the VPA.” What constitutes as more than a “minor impact”? It seems to me that all impacts are classified by the Department as “minor”, or “negligible”, yet I, and many others, believe them to be major. To assume impacts would be “offset by contributions” is DISGUSTING!! Throwing money at issues should not be used as an adequate mitigation measure. There are communities, and individuals, facing major upheaval due to all of the proposed renewable energy infrastructure projects, including the Dubbo Firming Power Station, so if there is a need to BUY SUPPORT renewable energy project developers should be FORCED TO share funds to every impacted person/business ie. those whose properties are split by a transport route, those who will be impacted by road upgrades and traffic increases, those who have children on the school bus – lets call it danger pay. I do not believe you will find any individual in the Central West, and much further afield who will not be adversely affected by the construction, and operation period of all renewable energy projects – adequately compensating every individual is impossible!

Community consultation

There is no evidence of sufficient community consultation in the EIS. While Squadron list stakeholders and state the community information sessions were held, nowhere does it state the number of community members who participated. If community members didn't know these sessions were on, how could they possibly attend? Evidence needs to be shown that adequate community participation and awareness was reached, not merely that they were "held". The project documentation, total number of DPHI submissions, and Dubbo Regional Councils' comment in their IPC submission all indicate that there is substantial lack of community awareness and participation around this project. This is a concern for any development, but particularly this type of State Significant Development and one located so close to the city of Dubbo.

Dubbo Regional Council states in its letter to the IPC, that "Council has not received any feedback from the community in relation to this project." The IPC could, potentially, take this as an indicator that majority of the community had no knowledge of the proposal. There is no sufficient evidence to demonstrate 1. Awareness and knowledge of the project 2. Support and 3. Objections. Can Council evidence where they have proactively invited and received community participation in the consideration of this project?

How was the community of Dubbo and surrounding districts involved in the site selection for this project?

1. the EIS states that Dubbo was "selected" as the most appropriate location due to a number of factors relating to the CWO REZ.
2. the EIS also states that the actual parcel of land was identified primarily due to the zoning and an interested landowner.

These crucial decisions are made WITH NO community consultation or involvement, what then follows is a model of self-professed "community consultation" endeavours, whereby no-ones true and genuine knowledge, opinion or view on the project is actually sought and utilised to contribute to planning decisions that would otherwise create a real "collaborative" project with real social licence. The notion that there was legitimate community consultation is in my opinion, only perceived.

Traffic & Transport

"The Department considers impacts to the road network would be minor and traffic impacts can be managed". Transport and traffic will be a major issue when considering the cumulative impacts of all projects proposed for NSW. A large proportion of construction materials for the "rapid transition to renewable energy" will be transported from the Port of Newcastle to rural and regional NSW requiring the use of the Golden Highway. This route is a major freight route from all of Western NSW to the Port of Newcastle. There will need to be major upgrades to this route PRIOR TO any project construction. If commodities cannot get from rural NSW to Port that will cost the agricultural industry dearly. There is also the possibility of causing more road accidents due to impatient and frustrated drivers being stuck behind oversize overmass vehicles. How will the enormous impacts on local roads and major transport routes be mitigated to the satisfaction of the local community, and greater rural and regional NSW – the people that will live with the aforementioned impacts EVERY DAY? The ramifications will be much greater on those who live in the area, and on the transport route, than the experts assessing and modelling these impacts suspect, or will have to live with. How will those who own a property split by any of these transport routes safely move livestock across these roads? How will school buses safely traverse these routes twice a day? Will something only be done once an accident occurs or will measures be taken to prevent any accidents? Whilst it could be argued that the Dubbo Firming Power Station will only contribute a small proportion of the proposed traffic movements, compared to the greater CWO REZ, and the state projects as a whole, without the "rapid transition to renewable energy" and the number of proposed solar, wind and hydro projects the firming station would become redundant.

What would constitute a major traffic impact to the Department? Would Transport for NSW have raised concerns about the potential impacts on road and intersections if the "rapid transition to renewable energy" was a private developer initiative rather than Government led?

Conclusion

Dubbo Firming Nominees Pty Ltd is a wholly owned subsidiary of Squadron Energy. Squadron Energy has multiple renewable energy generation projects proposed in NSW, and Australia, and stands to profit extensively from the "rapid transition to renewable energy" through both electricity supply and the Australian Governments Renewable Energy Target (RET) Scheme. What transparent process and governance structures did this project follow, to enable Squadron Energy to be the successful proponent of this crucial piece of infrastructure in the CWO REZ?

Emma Bowman
Dunedoo NSW