



18 October 2021
Contact Person: J Shillito

Lachlan Shire Council
58-64 Molong Street
PO Box 216
CONDOBOLIN NSW 2877
P: 02 6895 1900
F: 02 6895 3478
E: council@lachlan.nsw.gov.au
ABN 82 815 250 829

Department of Planning, Industry and Environment
PO Box 39
SYDNEY NSW 2001

**Attention: Rose-Anne Hawkeswood
Team Leader Energy, Climate Change and Sustainability**

Dear Rose-Anne

**Application Number: DA374-11-00-Mod-7
Applicant: Clean TeQ Sunrise Pty Ltd
Description of Proposed Modification: The proposed modification includes changes to the mining schedule, mine site infrastructure, accommodation camp, and rail siding**

Thank you for the opportunity to review the submissions report in relation to the abovementioned project.

The submissions report has been reviewed and a number of comments/observations are made below in relation to the report.

Housing Availability Impacts

The report from SEM states:

“Issue

The LSC raised concerns regarding the potential incremental housing availability impacts during the initial construction phase of the modified Project.

Response

The majority of the Project construction workforce would be accommodated in the accommodation camp (once operational) which would minimise potential impacts on the local housing market.

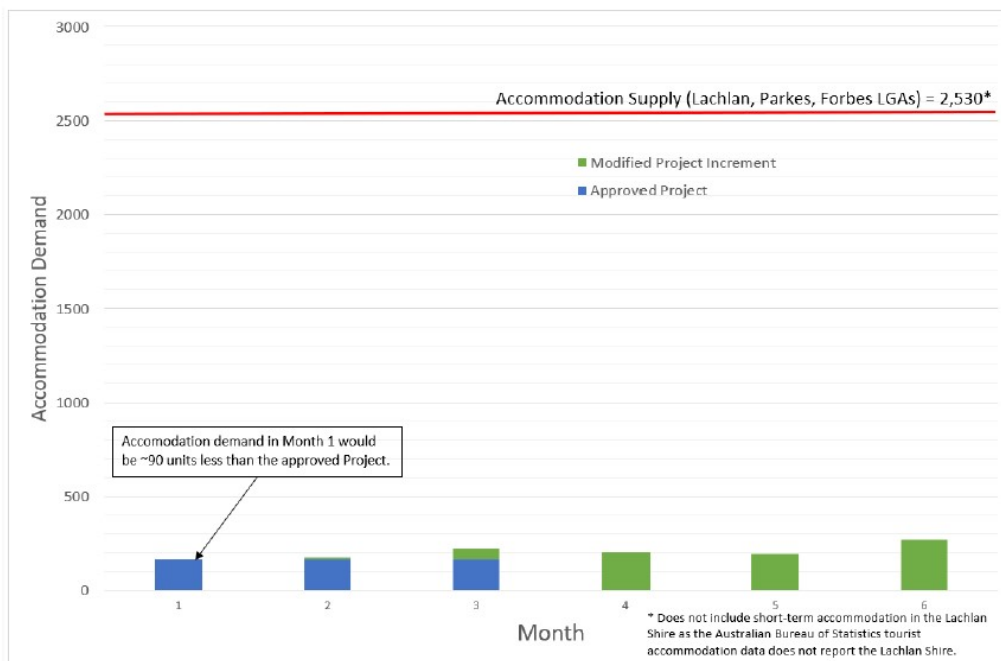
The Modification would increase the duration of the period where the accommodation camp would not be available (as it is being constructed) from approximately three months to six months. During this initial construction phase, the Project construction workforce size would average 211 personnel and peak at approximately 300 personnel (Section 4.1.1 of the Social Impact Review).

Due to the highly specialised, skilled nature of the Project construction workforce, it is expected that 90% of the Project construction workforce would be filled by non-local workers and the remaining 10% filled by local residents already residing in the region (Section 4.1.1 of the Social Impact Review). The average and peak non-local workforce

during the initial construction phase when the accommodation camp would not be available would be 190 personnel and 270 personnel, respectively.

A summary of the approved and modified accommodation demand over the initial construction phase when the accommodation camp would not be available is provided on Figure 4. The modified accommodation demand would vary month to month in line with the modified Project construction workforce (Figure 4). The modified accommodation demand (i.e. 190 accommodation units) would be approximately 25 units higher than the approved accommodation demand (i.e. 165 accommodation units) on average.

Figure 4
Summary of Approved and Modified Accommodation Demand and Existing Accommodation Supply



This average incremental demand represents approximately 1% of the total short-term accommodation and rental accommodation supply in the Lachlan, Parkes and Forbes Shires, respectively. It is noted that this estimate is conservative as the estimated available short-term accommodation units does not include short-term accommodation in the Lachlan Shire as the Australian Bureau of Statistics tourist accommodation data does not report the Lachlan Shire (Section 4.2.2 of Social Impact Review).

Based on the above, the short-term accommodation and rental markets would be able to cater for the additional non-local workforce during the initial six-month phase until first rooms are available at the accommodation camp (Section 4.2.2 of the Social Impact Review). Notwithstanding the above, once the timing of construction commencement has been confirmed, SEM would provide information regarding the Project workforce and the associated predicted housing demand to the LSC, PSC and FSC to minimise potential social impacts of the Project.

For Condobolin, the Modification is expected to reduce the accommodation demand during the initial construction phase when the accommodation camp would not be available relative to the approved Project. Accommodation demand for the approved Project was expected to be approximately 95 accommodation units in Condobolin (Martin & Associates Pty Ltd, 2000). For the modified Project, approximately 33% of the construction workforce is expected to reside in Condobolin during the initial construction

phase (Section 4.1.1 of the Social Impact Review) which would result in an average and peak accommodation demand of approximately 65 and 90 accommodation units, respectively. The Modification would however extend the duration of this reduced accommodation demand in Condobolin from three to six months.

Once the accommodation camp becomes available in approximately month 7, the modified Project workforce would be accommodated in the accommodation camp and is not expected to impact the local housing market for the remainder of the construction phase (Section 4.2.3 of the Social Impact Review)."

We disagree with the above information. It would appear that the data being used is either inaccurate or out-of-date as the situation on the ground does not match the information outlined above. The availability of short term accommodation and rental accommodation is already stretched in Condobolin and whilst we cannot talk for Parkes it is our understanding that they are in a similar position. There are a number of factors influencing this situation, including Mineral Hill and their operations (47 employees on a 7 x 7 roster), mining exploration projects, building projects, agricultural contractors, etc.

The data should be supported by discussing the on-the-ground information and providing feedback from local accommodation providers and real estate agents. What accommodation is actually available on the ground at the moment and what is the quality of that accommodation. As 90% of the construction workforce is highly skilled it can be expected that SEM will need to provide quality accommodation in order to attract/retain those staff members. A discussion should also be included on the quality of accommodation available during the construction period for the construction camp.

Health Service Impacts

The report from SEM states:

"Issue

The LSC raised concerns regarding the potential incremental health service impacts during the construction phase of the modified Project.

Response

The Modification would include an increase in the peak construction phase workforce from approximately 1,000 personnel to approximately 1,900 personnel and an increase to the duration of the construction phase from two to three years.

Due to the highly specialised, skilled nature of the construction workforce, it is expected that 90% of the Project construction workforce would be filled by non-local workers and the remaining 10% filled by local residents already residing in the region (Section 4.2.4 of the Social Impact Review). Given the above, the majority of the Project construction workforce are expected to access most non-acute health care (e.g. routine GP visits) at their home location and therefore the Project construction workforce would have no significant impact on non-acute health care (Section 4.2.4 of the Social Impact Review).

Any increased demand during the construction phase may be associated with acute health care. SEM would provide first aid facilities at the mine and processing facility that would minimise demand for acute health care from existing health services (Section 4.2.4 of the Social Impact Review). The first aid facilities would be able to treat minor injuries (e.g. cuts) and illnesses (e.g. colds) the Project construction workforce may have while onsite. In addition, treatment of the Project construction workforce with minor illnesses

onsite will not require a medical certificate to be provided from local health services. This will be managed by onsite health services.

More significant acute health care requirements are expected to be addressed by regional health services in Parkes and Dubbo (e.g. Parkes Hospital). Given the above, the Modification is not expected to significantly change approved impacts on health services in the region.”

The above information does not satisfactorily address the concerns we have previously raised. SEM need to provide more information on how they will deal with situations where workers arrive on site and then develop conditions that would ordinarily result in non-acute health care. It is presumed that the construction workforce will be FIFO or DIDO workers. If they arrive on-site and develop tonsillitis on day 2, for example, will the worker be sent home to receive non-acute care or will they be sent to a doctor in Condobolin or Parkes to receive the non-acute care? Treatment of such a condition could not be carried out on-site as the treatment would ordinarily require a prescription of antibiotics (which cannot be prescribed on site). What about workers that develop colds or other conditions that may not require off-site treatment but mean the worker cannot carry out their duties on consecutive days. Most workplaces require a doctor's certificate or the like in those circumstances. What will SEM require in these situations and will this place any additional pressure on the local health care system?

Consideration of Cumulative Impacts

The SEM report states:

“Issue

The LSC raised concerns regarding the Social Impact Review did not consider the Mineral Hill Gold Mine in the assessment of potential cumulative social impacts (including housing impacts).

Response

The Mineral Hill Gold Mine is located approximately 40 km north-west of the Project. Small-scale mining and processing operations have been undertaken at the Mineral Hill Gold Mine intermittently since 1988. Operations at the Mineral Hill Gold Mine recommenced in late 2020 after being in care and maintenance since 2016.

After recommencement, activities at the Mineral Hill Gold Mine are expected to occur for approximately 4 years and a workforce of approximately 20 personnel will be required. Local employees (including former Mineral Hill Gold Mine employees) will be preferentially employed where practicable (R. W. Corkery & Co, 2019) which would reduce potential social impacts (e.g. increased housing demand).

The potential social impacts associated with the recommencement of operations at the Mineral Hill Gold Mine were considered to be “largely positive” and would be greater than any adverse social impacts (R. W. Corkery & Co, 2019). In addition, the LSC (2020) noted that the recommencement of operations at the Mineral Hill Gold Mine would result in no significant change to social impacts. Given the relatively small workforce associated with the Mineral Hill Gold Mine, and the potential social impact conclusions above, it is considered that the Mineral Hill Gold Mine, in conjunction with the identified social impacts of the Modification, would not contribute to significant cumulative social impacts (including housing availability).”

Mineral Hill currently has 47 employees on-site and, in addition, a number of contractors are also working at the facility.

The report from SEM also states:

“Issue

The LSC raised concerns regarding the Social Impact Review did not consider the Moomba to Wilton Pipeline Modification 1 in the assessment of potential cumulative social impacts.

Response

The Moomba to Wilton Pipeline Modification 1 would involve the construction and operation of a new compression station on the Moomba to Wilton Pipeline approximately 35 km south-west of Condobolin. Construction and commissioning of the compressor station is expected to take place in 2022 and require an average and peak workforce of approximately 40 and 80 personnel, respectively. The workforce would reside in short-term accommodation in Condobolin or an onsite accommodation camp. The operational workforce would be 1 to 2 personnel (EMM, 2021).

No Modification Report for the Moomba to Wilton Pipeline Modification 1 had been submitted at the time of submission of the Modification Report. The Moomba to Wilton Pipeline Modification 1 is therefore a ‘potentially relevant’ project and does not need to be considered in the Modification Report (including the Social Impact Review) in accordance with the draft Assessing Cumulative Impacts Guide Guidance for State Significant Projects (DPIE, 2020b).

Subsequent to the submission of the Modification Report, the DPIE (2021b) issued the Cumulative Impact Assessment Guidelines for State Significant Projects. The Moomba to Wilton Pipeline Modification 1 is still considered a ‘potentially relevant’ project and does not need to be considered for the Modification under the latest DPIE guideline.

Notwithstanding the above, a Modification Report for the Moomba to Wilton Pipeline Modification 1 (EMM, 2021) was submitted after the submission of the Modification Report and therefore consideration of the Moomba to Wilton Pipeline Modification 1 is included herein. As the construction and commissioning of the compressor station is expected to occur in 2022, it is unlikely that the construction of the compressor station and the modified Project would occur simultaneously. This is consistent with the conclusions of the Modification Report for the Moomba to Wilton Pipeline Modification 1 (EMM, 2021).”

As SEM have not made a final financial decision in relation to the Sunrise project we agree with the above comments. Provided DPIE believes that the applicant has satisfactorily addressed the cumulative impacts of all future projects in the region (e.g. Inland Rail, Parkes Special Activation Precinct, Parkes By-Pass, etc.) particularly in terms of housing availability and affordability, we raise no further comment in relation to this matter.

Regional Employment Opportunities and Training

The report from SEM states:

“Issue

The LSC raised concern that the Modification would reduce employment opportunities for existing residents in the region and sought details of SEM’s proposed training programs for existing residents.

Response

The Project (including the Modification) would provide significant employment opportunities for local residents residing in the region. The Modification would include an increase in the peak (average) construction phase workforce from approximately 1,000 (611) personnel to approximately 1,900 (962) personnel. Due to the highly specialised, skilled nature of the construction workforce, it is expected that approximately 90% of these construction roles would be filled by non-local workers and the remaining (10%) roles would be filled by local residents already residing in the region. The modified Project would therefore provide opportunities for up to approximately 190 local residents (Section 6.13.2 of the Modification Report).

A comparison of the approved and modified local construction workforce is provided in Table 3. The Modification would increase employment opportunities for local residents over the construction phase from approximately 257 full-time equivalents to 289 full-time equivalents.

Table 3
Approved and Modified Local Construction Workforce

Project	Total Workforce	Percentage Local Residents	Local Workforce	Duration of Construction Phase	Local Workforce Over Construction Phase (Full-Time Equivalent) ²
Approved	Peak = 1,000 Average = 611	21% ¹	Peak = 210 Average = 128	2 Years	257
Modified	Peak = 1,900 Average = 962	10%	Peak = 190 Average = 96	3 Years	289

¹ Martin & Associates Pty Ltd (2000).

² Based on average workforce.

The Modification would also include a minor increase in the operational workforce from approximately 335 personnel to approximately 340 personnel (the rail siding workforce would increase from five to 10 personnel) which would provide increased opportunities for local residents. SEM would develop strategies to train and upskill people from the local area (particularly the unemployed) once the timing of construction commencement has been confirmed. This would maximise the number of local employees in the Project workforce.”

Council acknowledges and appreciates the comments from SEM, particularly the “development of strategies to train and upskill people from the local area (particularly the unemployed)”. We look forward to this forming part of the approval of the project, in the form of a condition of approval, to ensure that this is carried out.

Voluntary Planning Agreement

The report from SEM states:

“Issue

The LSC indicated that the Modification may require changes to the community enhancement contribution component of the existing VPA to offset the increased demand on community infrastructure.

Response

SEM considers that the existing VPA community enhancement contribution (i.e. \$200,000 per year [indexed]) is appropriate for the modified Project as the Modification would not significantly increase potential impacts on LSC-operated community infrastructure relative to the approved Project:

- *The modified Project construction workforce would continue to be accommodated in the accommodation camp (once constructed) to minimise potential impacts on LSC-operated community infrastructure.*
- *The Modification is expected to reduce the peak accommodation demand in Condobolin during the initial construction phase when the accommodation camp would not be available from approximately 95 to 90 accommodation units and therefore there would be a reduction in potential impacts on LSC-operated community infrastructure during this phase of the modified Project.*
- *Although the Modification would increase the duration of the initial construction phase when the accommodation camp would not be available from three to six months, SEM would make an additional community enhancement contribution (i.e. \$200,000 per year [indexed]) in accordance with the existing VPA as a result of the increased construction phase duration proposed as part of the Modification.*
- *The modified Project operational workforce would not significantly change (increase from 335 to 340 personnel) and therefore there would be no significant change to the potential impacts on LSC-operated community infrastructure during the 21 year operational phase of the modified Project.*

Based on the above, SEM considers that no changes to its existing community enhancement contributions outlined in the existing VPA are required for the Modification.”

Taking the above information into account as well as the “development of strategies to train and upskill people from the local area (particularly the unemployed)”, we agree that no changes are required to the existing community enhancement contributions outlined in the existing VPA.

Noise Impacts

The report from SEM states:

“Acquisition Upon Request Rights

Issue

The LSC requested additional information regarding potential noise impacts on residences in the vicinity of the mine and processing facility and the application of voluntary acquisition rights under the Voluntary Land Acquisition and Mitigation Policy (NSW Government, 2018).

Response

SEM would implement reasonable and feasible noise mitigation measures at the mine and processing facility, including significantly modifying mining operations during adverse meteorological conditions (Section 6.3.2 of the Modification Report). With the implementation of these noise mitigation measures, no privately-owned sensitive receivers are predicted to experience significant exceedances and therefore acquisition upon request rights would not be required for the Modification in accordance with the Voluntary Land Acquisition and Mitigation Policy (NSW Government, 2018).

Notwithstanding the above, given the considerable operating costs associated with significantly modifying mining operations during adverse meteorological conditions, SEM may seek to enter into negotiated agreements with the owners of relevant privately-owned receivers in accordance with the Voluntary Land Acquisition and Mitigation Policy (NSW Government, 2018). In accordance with Condition 7, Schedule 3 of Development Consent (DA 374-11-00), if negotiated agreements were to be put in place with the owners of the relevant privately-owned sensitive receivers, or these sensitive receivers

were to become SEM-owned, significant modifications to mining operations would not be considered reasonable, and modifications to mining operations would be less significant (e.g. ceasing operation of a small number of noisy equipment such as drills or avoiding the use of intermittently operating auxiliary equipment).

However, if negotiated agreements with the owners of the relevant privately-owned sensitive receivers are not achieved, or are only achieved for a subset of the relevant privately-owned sensitive receivers, SEM would implement all of the noise mitigation measures described in the Modification Report.

Owners of all of the privately-owned sensitive receivers that are predicted to experience exceedances of the relevant noise criteria have been provided with an overview of the conclusions of the Noise Assessment by SEM.”

Provided the above has been satisfactorily addressed in the conditions of approval, or will be with the approval of the modification application, Council raises no further concerns in relation to noise impacts.

Traffic/Road Impacts

Following the lodgement of our submission in relation to the project a meeting was held with representatives from SEM. Following our meeting and through the information provided at the meeting, specifically relating to the number of vehicles on the roads within the Lachlan Shire, we are of the view that the existing VPA will be sufficient as it relates to road contributions and we raise no further concerns in relation to the traffic impacts associated with the development.

If you should have any further enquires with regards to this matter please contact the undersigned on 02 6895 1950 during office hours.

Yours sincerely



Jon Shillito
Director
Environment, Tourism and Economic Development