



Luddenham Advanced Resource Recovery Centre

COMMUNITY CONSULTATION PLAN

Prepared for Coombes Property Group | 13 March 2025





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SSD 10446 COMMUNITY CONSULTATION PLAN

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13 March 2025

PR371

Prepared by		Reviewed by
Name	Adrian Miller	Darren Green
Company	Element Environment	Element Environment
Position	Senior Consultant	Project Director
		
Signature		
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1 INTRODUCTION

This Community Consultation Plan (CCP) has been prepared by Element Environment Pty Ltd (Element) for the construction and operation of the Luddenham Advanced Resource Recovery Centre (ARRC) in Luddenham, NSW, on behalf of Coombes Property Group (CPG).

The site is located at 275 Adams Road, Luddenham NSW (Lot 3 in DP 623799, 'the site') within the Liverpool Local Government Area. The ARRC was approved by State significant development (SSD) application 10446 (SSD-10446) on 13 August 2024.

The adjoining existing shale/clay quarry is approved by Development Approval (DA) 315-7-2003, issued by the NSW Minister for Planning under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act).

The CCP addresses the relevant conditions of consent of SSD-10446, as well as guidance from Department of Planning, Housing and Infrastructure (DPHI) *Undertaking Engagement Guidelines for State Significant Projects (2024)* policy.

The plan describes the methods used to facilitate communication and coordinated engagement between CPG, the construction and operational contractors, key stakeholders and the community, including complaints management.

1.1 Project description

The site is in Luddenham in the Greater Western Sydney region of NSW. It is approximately 19 km north-west of the City of Liverpool and the total area of the site is 19 hectares (ha).

The ARRC will be developed within an approved development footprint of approximately 3 ha within the site. Immediately to the south of the ARRC, there is an existing operational shale and clay quarry, which occupies approximately 6 ha of the total site area.

The following will be built as part of the ARRC:

- Sealed driveway access from Adams Road.
- Internal sealed roads.
- Hard surfacing for the warehouse floor and external areas.
- An approximately 13,000 m² metal clad fully enclosed warehouse, with an elevation of 16 m.
- Two site offices: the larger office will be located in the outside parking area, while the smaller office will be located over the car parking area on the western side of the ARRC warehouse.
- Surface water drainage system.

The project also includes the installation of:

- Marked traffic and pedestrian areas.
- Approximately 47 parking spaces for staff and customers to the west and northwest of the ARRC warehouse.
- Four weighbridges: two inbound and two outbound weighbridges.
- Two ticket booths: one for incoming and one for outgoing vehicles.
- A wheel wash for outbound vehicles.
- Awnings attached to the warehouse at each warehouse entry/exit point.
- Separate tanks for firewater supply (above ground) and containment (below ground), and a fire suppression system.
- A stormwater management system, including rainwater tanks and an onsite detention basin.
- An on-site surface water management system consisting of a water treatment plant, onsite leachate and water detention areas.
- An on-site wastewater management system comprising a septic tank.

- Connection to services.
- Fencing and signage at the front of the site.
- Landscaping.

The construction phase outlined above is expected to take 12-18 months.

Once fully operational, the ARRC will process up to 600,000 tonnes per annum (tpa) of waste for recycling, and it will dispatch up to about 540,000 tpa of recycled product.

The ARRC will accept general solid waste (non-putrescible), including building and demolition waste as well as selected commercial and industrial waste, such as wood waste, glass, plastic, rubber, plasterboard, ceramics, bricks, concrete, metal, paper, cardboard, asphalt waste, cured concrete, soils, and excavated natural material. The ARRC will not receive any putrescible vegetative waste, garden waste, restricted solid waste, hazardous waste, special waste or asbestos waste.

Approximately 80–90% of materials will be recovered, with the remaining 10–20% of non-recyclable residues disposed of at an offsite licensed facility.

2 OVERVIEW OF PLAN

The CCP outlines the approach for engaging with the community and stakeholders throughout the construction and operation of the ARRC project. This plan ensures compliance with the requirements of SSD-10446 and provides a framework for ongoing communication, stakeholder engagement and issue resolution.

The CCP is a standalone document required under SSD-10446. It is not an environmental management plan but rather a communication and engagement strategy designed to ensure transparency and responsiveness to community concerns.

While the CCP is independent, it is referenced in relevant environmental management plans, including the Construction Environmental Management Plan (CEMP), to ensure consistency in stakeholder engagement, complaints handling, and notification procedures.

This plan has been developed to comply with:

- SSD-10446.
- Department of Planning, Housing and Infrastructure (DPHI) *Undertaking Engagement Guidelines for State Significant Projects* (March 2024).
- ARRC EIS Community and Stakeholder Engagement Strategy.
- ARRC EIS Updated Statement of Commitments.

This CCP must be approved by the Planning Secretary prior to the commencement of site preparation work, and will be implemented for the life of the ARRC, or as otherwise agreed by the Planning Secretary.

For ease of reference, Table 2.1 outlines the specific SSD-10446 requirements relating to community consultation. The CCP will be implemented upon approval by the Planning Secretary and will remain in effect for the duration of the development.

Table 2.1 Community related conditions of consent

CoC reference	Community engagement obligations	CCP reference
B109	The Applicant must consult with the community regularly throughout the Development, including consultation with the nearby sensitive receivers identified on Figure 3 in Appendix 1 of this consent, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.	This CCP
B110	The Applicant must prepare a Community Consultation Plan for the Development, to the satisfaction of the Planning Secretary. The Plan must:	
	a. be approved by the Planning Secretary prior to the commencement of site preparation works;	Section 2
	b. be implemented for the life of the Development, or as otherwise agreed by the Planning Secretary;	Section 2
	c. assign a central contact person to keep the nearby sensitive receivers regularly informed throughout the Development;	Section 3
	d. detail the mechanisms for regularly consulting with the local community throughout the Development, such as holding regular meetings to inform the community of the progress of the Development and report on environmental monitoring results;	Section 5.2 Section 6
	e. detail a procedure for consulting with nearby sensitive receivers:	CNVMP s5.2
	i. to schedule high noise generating works, vibration intensive activities or manage traffic disruptions during construction; and	Section 6.3
	ii. regarding operational noise and traffic management	

CoC reference	Community engagement obligations	CCP reference
	f. include contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders; and g. include a complaints procedure for recording, responding to and managing complaints, including: i. email, toll-free telephone number and postal address for receiving complaints ii. advertising the contact details for complaints prior to and during operation, via the local newspaper and through on-site signage iii. complaints register to record the date, time and nature of the complaint, details of the complainant and any actions taken to address the complaint; and iv. procedures to resolve any disputes that may arise during the course of the Development.	Section 5.1 Appendix 1 Section 8
B111	The Applicant must: ▪ not commence construction until the Community Consultation Plan is approved by the Planning Secretary. ▪ implement the approved Community Consultation Plan for the duration of the Development.	Section 2
C3	As part of the CEMP required under condition C2 of this consent, the Applicant must include the following: ▪ Construction Traffic Management Plan (see condition B13); ▪ Erosion and Sediment Control Plan; ▪ Construction Noise and Vibration Management Plan (see condition B28); ▪ Construction Waste Management Plan (see condition B62); and ▪ Community Consultation and Complaints Handling.	Section 8
C20	At least 48 hours before the commencement of construction of the Development and for the life of the Development (or such other time as agreed by the Planning Secretary), the Applicant must: (a) Make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in condition A2 of this consent; (ii) all current statutory approvals for the Development; (iii) all approved strategies, plans and programs required under the conditions of this consent; (iv) the proposed staging plans for the Development if the construction, operation or decommissioning of the Development is to be staged; (v) regular reporting on the environmental performance of the Development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; (vi) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; (vii) a summary of the current stage and progress of the Development; (viii) contact details to enquire about the Development or to make a complaint; (ix) a complaints register, updated monthly; (x) the Compliance Report of the Development; (xi) audit reports prepared as part of any Independent Audit of the Development and the Applicant's response to the recommendations in any audit report; (xii) any other matter required by the Planning Secretary; and (b) Keep such information up to date, to the satisfaction of the Planning Secretary.	Section 9

3 PERSONNEL AND RESOURCES

The CCP applies to all phases of the ARRC project, including both construction and operation. As the project is currently in the construction phase, the personnel and resources outlined in this section are focused on meeting the requirements for construction.

As the project progresses towards operation, the roles, responsibilities, and resources for community engagement will be reviewed and updated to reflect the needs of the operational phase. This will ensure continuity of engagement with the community and key stakeholders throughout the lifetime of the development.

3.1 Personnel and availability

The managing contractor's organisational structure for communications and engagement is shown in Table 3.1.

Table 3.1 Contact details

Role	Name	Contact details
CPG Project Director	Pascal Bobillier	(02) 9389 6111 pascal@coombesgroup.com.au
CPG Project Environment Manager	Elena Ivanova	(02) 9389 6111 elena@coombesgroup.com.au
Independent Environmental Representative	Richard Peterson	0429227775 Richard.peterson-trigalana@outlook.com
Contractor's Construction Manager	Marcus Cooper	0404 808 508
Contractor's Site Manager	Peter Free	0434 745 841
Stakeholder and Community Engagement Manager or Nominee	Chris Brogan	0402 663 780

To ensure compliance with SSD-10446 B110(c), a Texco representative will be appointed as the nominee for stakeholder and community engagement during the construction phase. This representative will serve as the central contact person responsible for regularly informing key stakeholders throughout the project's construction phase.

During the construction phase, the Nominee will be:

- Available eight hours per day, five days per week, except for short periods of leave.
- Working flexibly to ensure a representative is available to respond to community enquiries and incidents via the community contact line.
- Attending community meetings and events outside of standard business hours as required.

For the operational phase, personnel and resourcing will be confirmed and updated in this plan closer to the commencement of operations.

The roles and responsibilities of the Nominee for stakeholder and community engagement are outlined in Table 3.2.

Table 3.2 Roles and responsibilities

Team member	Responsibilities
Stakeholder and Community Engagement	▪ Member of the project senior leadership team, direct report to the project director. ▪ Principal point of contact for stakeholder and community issues.

Team member	Responsibilities
Manager or Nominee	- Oversee the development, management, coordination and implementation of the CCP and all community engagement activities. - Drives engagement across the project team with key stakeholders. - Supports the procurement team to implement a best practice engagement model with subcontractors and suppliers. - Supports the project director to deliver a high-quality and tailored internal communication program. - General oversight of the engagement and communications program. - Reporting of stakeholder and communication activities. - Developing project collateral for dissemination to the community. - Liaising with sensitive receivers. - Keeping the complaints register updated. - Provide the ER with the complaint register daily.

3.2 Community contact information

To facilitate transparent communication and issue resolution, the ARRC project will provide multiple accessible channels for stakeholders and community members to submit inquiries, feedback, and complaints during both the construction and operational phases.

The contact details will be publicly available on:

- The project website, in accordance with SSD-10446 C20.
- Community newsletters and project updates.
- On-site signage at key project locations.

Contact details to be made publicly available includes:

- **Email:** info@luddenhamrecycling.com.au
- **Community contact line:** 1800 403 265
- **Postal address:** Level 5, 2 Grosvenor Street, Bondi Junction, NSW 2022
- **Project website:** <https://luddenhamrecycling.com.au/> (the project website will continue be managed by CPG)

All complaints, inquiries, and feedback received through these channels will be:

- Recorded in the Community Contacts Database within 48 hours.
- Addressed in accordance with the project's complaints management procedure.
- Included in the publicly available complaints register, which will be updated monthly as required by SSD-10446 C20(ix).

Additionally, project progress updates, monitoring results, and audit reports will be made publicly available on the project website, in compliance with SSD-10446 C20.

The contact details and public information will be reviewed and updated as the project transitions to the operational phase to ensure continued accessibility and compliance.

3.3 Community contacts database

A community contacts database will be established and maintained during construction and operation of the ARRC. All interactions with stakeholders and community members will be entered into the database within 48 hours of being received.

All landowners adjacent to the project and key stakeholders will be included in the database and given the option to be provided with regular updates on the project. This database will be used to record all representations received from the community, including complaints and reports will be generated upon request and as part of the monthly reports provided to the principal contractor.

3.4 Staff training

As ambassadors for the project, all managing contractor personnel and sub-contractors are required to carry out compulsory induction training on community awareness and protocols. Key elements of the induction training include:

- An outline of community objectives and obligations.
- Community profile (including aboriginal culture and history of the area).
- Key issues and mitigation measures.
- Details of the free call community contact telephone line.
- How to handle community inquiries and /or complaints.
- How to manage interactions with the public and media.

Records of induction participation will be included in monthly project reports. Daily pre-start meetings and toolbox talks will also be used to communicate key stakeholder and community relations messages, sensitive and contentious issues and lessons learned. A specific, community relations focused toolbox talk will be held at least once a quarter.

4 OBJECTIVES

The objective of engagement during the project is to ensure the community and stakeholders are informed about project activities, timing and impacts. The project team is committed to providing accurate and current information to assist in managing community expectations and encouraging an understanding of the project and its benefits.

The objectives of this CCP aligns with the core values and best practice standards developed by the International Association for Public Participation (IAP2), the DPHI's *Undertaking Engagement Guidelines for State Significant Projects* (March 2024) and previous communication plans developed for the project.

Generally, objectives for community consultation are listed in Table 4.1.

Table 4.1 Objectives

Objectives	Actions
Open and inclusive	- Keep the community informed. - Promote participation. - Seek community input and accurately capture community views. - Build strong partnerships with the community. - Incorporate culturally appropriate practices when engaging Aboriginal and Torres Strait Islander and culturally and linguistically diverse communities. - Conduct community participation initiatives in a safe environment.
Easy to access	- Outline in advance how and when the community can participate. - Use best practice community participation techniques. - Make relevant information available in plain English and translate information when engaging linguistically diverse communities or people living with disabilities. - Incorporate visual representations to clearly illustrate possible impacts of a proposal. - Ensure information is accessible for groups who find it difficult to participate in usual community participation activities. - Stage events at convenient times and locations.
Relevant	- Establish what is up for discussion. - Ensure as many community members as possible can participate. - Recognise previous community input on the project and similar issues. - Tailor activities to the: - Context, which could include location, type of application, stage of project, previous engagement scale, nature and known impacts for the proposal. - Adjust activities (if necessary) in response to community interest and participation preferences.
Timely	- Start community participation as early as possible and continue for an appropriate period. - Provide regular project updates to the community. - Ensure the community has reasonable time to provide input. - Facilitate ongoing discourse with local community networks. - Consider holidays and other community events when setting dates for engagement initiatives.
Meaningful	- Always explaining at the end of projects how community views were considered when reaching decisions. - Be clear about what aspects of a plan, project or proposal the community can inform. - Have planners and decision-makers engage directly with the community. - Ensure responses to community input are relevant and proportionate. - Give genuine and proper consideration to community input.

Objectives	Actions
	▪ Keep accurate records of community input and participation activities. ▪ Regularly review the effectiveness of community participation initiatives. ▪ Integrate community input into the evaluation process. ▪ Comply with statutory obligations, protect privacy and respect confidentiality.

Our community engagement approach aligns with the core values and best practice standards developed by the International Association for Public Participation (IAP2). Our methodology for best practice engagement is also underpinned by a commitment to proactive engagement with stakeholders and the wider community to anticipate and meet their needs. We seek, where possible, to exceed basic compliance with project conditions and aim to leave a positive legacy for the community. This approach will be measured and evaluated against the goals and objectives of engagement which are informed by the EIS.

Specifically, the objectives of the CCP will be to:

- Keep the community and stakeholders informed with regular updates as required and outlined in this CCP.
- Collaborate with stakeholders to balance different interests.
- Address and resolve stakeholder concerns during the construction and operational phases of the project.

5 STAKEHOLDERS AND IMPACTS

Stakeholders are individuals, groups, or organisations with an interest in the ARRC project. This list is indicative and will continue to be refined throughout construction and operation.

The CEMP and sub-plans include maps identifying nearby residents considered to be noise-sensitive receivers. Stakeholder records will be maintained and updated throughout the project's life to ensure relevant, engaged, and affected parties are appropriately consulted.

To ensure the stakeholder list remains accurate and reflective of active engagement, an annual stakeholder review will be undertaken. This process will:

- Assess stakeholder engagement levels and update records accordingly.
- Identify groups or organisations that have not responded to consultation efforts in the preceding year.
- Refine the list to focus on actively engaged and affected stakeholders, while ensuring all regulatory requirements are met.

A comprehensive stakeholder register will be maintained as Appendix 1 of this plan, in compliance with B110(f). This register will include contact details for:

- Key community groups.
- Relevant regulatory authorities.
- Registered Aboriginal Parties (RAPs).
- Other interested stakeholders.

5.1 Key stakeholders

Key stakeholders are listed in Table 5.1.

Table 5.1 Key stakeholders

Stakeholder group	Stakeholders	Interest / impact	Issues
State government	▪ NSW Minister for Planning ▪ NSW Minister for Industry and Trade ▪ NSW Minister for Domestic Manufacturing and Government Procurement ▪ NSW Member for Badgerys Creek ▪ NSW Department of Planning, Housing and Infrastructure ▪ NSW Environmental Protection Authority (EPA)	Low / low	▪ Environmental impacts ▪ Community outrage resulting in negative media coverage ▪ Escalation of complaints ▪ Damage to reputation
Local government	▪ Liverpool City Council ▪ Western Sydney Planning Partnership ▪ Western Sydney Airport Corporation ▪ Western Sydney Aerotropolis	High / high	▪ Impacts to local infrastructure, utilities and services ▪ Traffic impacts ▪ Socio-economic impacts ▪ Impacts to western Sydney airport operations
Registered Aboriginal Parties	▪ Gandangara Local Aboriginal Lands Council ▪ Didge Ngunawal Clan ▪ Goodradigbee Cultural and Heritage Aboriginal Corporation	High / high	▪ Impacts to cultural heritage ▪ Unexpected heritage items encountered

Stakeholder group	Stakeholders	Interest / impact	Issues
	▪ Kamilaroi-Yankuntjatjara Working Group ▪ Wailwan Aboriginal Group ▪ Waawaar Awaaa Aboriginal Corporation ▪ Dharug Ngurra Aboriginal Corporation ▪ Galamaay, Cultural Consultants ▪ Cubbitch Barta Clan ▪ Yulay Cultural Services ▪ Wurrumay Pty Ltd ▪ Butucarbin Aboriginal Corporation ▪ Guntawang Aboriginal Resources ▪ A1 Indigenous Services ▪ Barraby Cultural Services ▪ Yurrandaali Cultural Services		
Emergency services	▪ NSW Police ▪ Ambulance NSW ▪ NSW Rural Fire Service ▪ NSW Fire and Rescue Brigade	Low / low	▪ Traffic impacts including access, disruptions, delays and detours ▪ Road safety ▪ Incidents during construction/operation
Directly impacted landowners and tenants	▪ Properties identified in the EIS	High / high	▪ Construction impacts including dust, noise and vibration ▪ Operational noise ▪ OOHV ▪ Traffic impacts ▪ Odour
Local businesses	▪ Workers Hubertus Country Club	Medium / medium	▪ Construction impacts including dust and noise ▪ Operational noise ▪ OOHV ▪ Odour
Interest groups	▪ Circular Australia (formerly NSW Circular)	Medium / low	▪ Operation
Utilities	▪ Endeavour Energy ▪ Sydney Water	Low / medium	▪ Impacts to local infrastructure, utilities and services

To ensure meaningful engagement, the annual stakeholder review will assess engagement levels. If there are no responses from a stakeholder for an extended period, the list may be refined to focus on those actively involved. However, all stakeholders will continue to be invited to participate in engagement activities in accordance with project requirements.

5.2 Aboriginal cultural heritage consultation

Nineteen Registered Aboriginal Parties (RAPs) registered their interest during the consultation phase of the EIS (Table 5.1). These 19 RAPs wished to continue receiving information on the project during the construction phase. These same 19 RAPs were consulted during the preparation of the ACHMP.

The ACHMP will be available to RAPs once it is formally approved by DPHI. Should any RAPs wish to provide additional input following its approval, their feedback will be considered and addressed in the next revision of the ACHMP.

If any unexpected Aboriginal heritage items are discovered during the construction phase, the RAPs will be notified, and their input will be sought regarding any findings.

Furthermore, as the 19 RAPs are listed as key stakeholders, they will be subject to the activities listed in Table 5.2 and Table 6.1, as relevant.

Following the completion of the construction stage, CPG will continue to consult with RAPs regarding any future changes or updates to the operation of the ARRC.

5.3 Stakeholder consultation and communication measures

Proactive consultation and communication are critical to ensuring transparency and community trust throughout the project.

The project team will adhere to SSD-10446 Condition B110(d) by regularly consulting with the local community through meetings and updates on environmental performance.

Table 5.2 outlines key consultation and communication measures.

Table 5.2 Consultation and communication measures

Issue	Impacts	Communication tactics
Construction impacts including noise, vibration and dust	Impacts caused by: - Trucks, light vehicles, reversing beepers. - Earthworks and construction activities. - Out of hours work.	- One-on-one engagement with near receivers. - Information via letterbox drops, project website and 1800 number. - Notification and education of noisy activities. - On-going dust, vibration and noise monitoring (as per construction noise and vibration management plan and air quality management plan) and mitigation measures outlined in CEMP. - Minimising OOHW near residential properties and adhere to requirements in project documents. - Project personnel and subcontractors to be educated in minimising noise, vibration and dust at the project induction, pre-start meetings and toolbox talks.
Operational noise	- Impacts from operational road noise. - Lack of understanding of noise modelling and treatments.	- One-on-one engagement with near receivers. - Information via letterbox drops, project website and 1800 number.
Out of hours work	Disruption to nearby residents and businesses during out of hours work.	- Ensure out of hours work guidelines are followed. - Minimise out of hours work. - Seek agreement from impacted residents as required by EPL.
Local infrastructure, utilities and services	- Existing condition reports to ensure agreed baseline for restoration. - Coordination of works with local councils and services providers to minimise any impacts on their assets and program.	Consult with utilities, services and other infrastructure providers which may be affected by construction.
Traffic management impacts on motorists, including traffic changes, detours and access changes	Disruptions, delays and temporary detours including reduced speed limits, temporary shoulder and	One-on-one engagement with impacted business to understand access requirements.

Issue	Impacts	Communication tactics
	- road closures and construction access gates. - Minimising the impact and maintaining access to local residents, businesses and emergency vehicles.	- Targeted communications regarding changed road access including letterbox drops and meetings. - Emergency services are to be notified in advance of changes to traffic conditions (e.g. partial or total road closures) by briefings / presentation and email. - Inform road users via variable message signs and other signage.
Aboriginal and non-Aboriginal heritage	- Disturbance and damage to aboriginal and non-aboriginal heritage items. - Lack of consultation with the local aboriginal community and key stakeholders.	- Consultation in accordance with the procedure for aboriginal cultural heritage consultation and investigation and heritage management sub- plan. - Project site induction to incorporate aboriginal culture awareness training for all relevant staff and contractors.
Drainage, stormwater management, erosion, sediment control and water quality	Flooding during significant rainfall events, management of erosion and sediment control for temporary work.	- Hold meetings with nearby residents to inform and/or consult about drainage, stormwater management, erosion, sediment control and water quality. - Respond quickly to enquiries and complaints in accordance with the complaints management system (CMS). - Liaise with emergency services to minimise impacts, particularly before and during significant rainfall events.
Project progress and updates	- Community uncertainty about project status - Perceived lack of transparency	- Regular project progress updates via: - Project website - Letterbox drops - Community newsletters - Community meetings - Stakeholder briefings
Environmental monitoring results	- Concerns about environmental performance - Perceived non-compliance with conditions	- Publication of monitoring results via: - Project website - Community meetings and briefings - Reports available on request - Direct engagement with affected stakeholders

The Stakeholder and Community Engagement Manager will ensure environmental monitoring reports are regularly updated and made publicly available on the project website, as required by Condition C20(v) and C20(vi).

6 ENGAGEMENT & COMMUNICATION APPROACH

Transparent, two-way communication is the foundation of our strategy for dealing with all stakeholders impacted by our activities. The team is committed to community and stakeholder engagement which is:

- Inclusive: ensuring the community and stakeholders have timely, accurate and effective information about the development and that information is available through a range of channels.
- Proactive: informing and consulting with the community and stakeholders early to keep them informed as the project progressed and issues are identified, addressed, and closed out promptly.
- Responsive: facilitating two-way communications tools and channels.
- Respectful: we will make a genuine and practical effort to complete work in a way that is courteous, cooperative and minimises impacts.

We will work across the IAP2 Spectrum of Public Participation to inform, consult, involve, and collaborate on various aspects of the project as informed by stakeholder needs and interest (Figure 6.1).

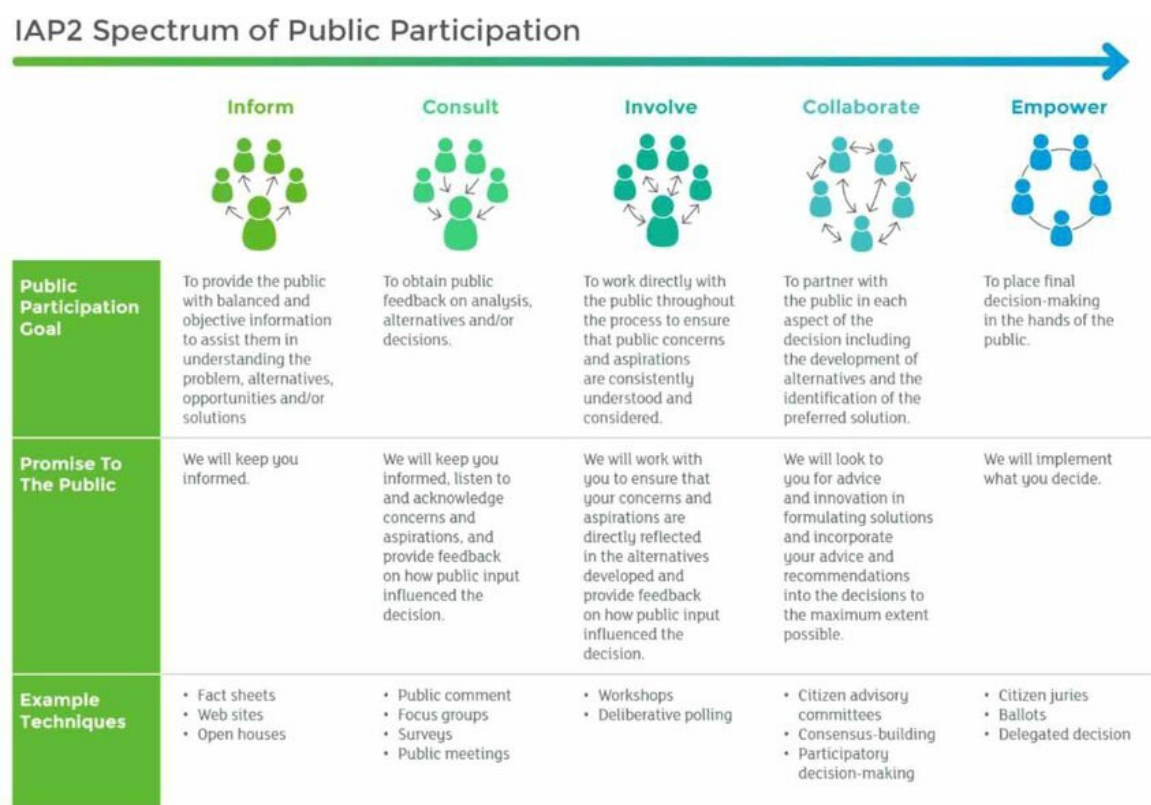


Figure 6.1 Spectrum of public participation

6.1 Information dissemination

A range of communication activities and tools will be used to inform and engage the community and stakeholders about the project. Engagement will be targeted to specific stakeholder groups across media which is accessible and relevant to these groups.

Primary channels may include those summarised in Table 6.1.

Table 6.1 Stakeholder activities

Channel	Objective	When
Face-to-face meetings	▪ Build trust ▪ Provide relevant and specific project information ▪ Reduce complaints	▪ When requested by stakeholder.
Project website	▪ Self-serve information	▪ Updated six monthly during construction and at least yearly during operation.
Community updates / newsletters	▪ Provide updates and information ▪ Nurture leads and relationships ▪ Push web traffic	▪ One newsletter at the start of construction; one on completion of construction.
Fact sheets	▪ Provide information on specific aspects of the project	▪ Will be developed for construction and operation and will be available on the project website.
Project phone number	▪ Respond to enquiries / complaints / feedback	▪ Will be available once construction starts.
Stakeholder database	▪ Track all interactions with stakeholders ▪ Nurture relationships	▪ Will be developed for start of construction.
Signage	▪ Build brand ▪ Promote location	▪ Will be installed for start of construction.
Media releases and interviews	▪ Reach new audiences ▪ Build brand ▪ Major announcements ▪ Milestone and events news ▪ Issues management	▪ Two will be developed – one for start of construction; one for completion of construction and start of operation.
Social media	▪ Create local presence ▪ Build trust ▪ Rapid announcements and issues management	▪ Two posts will be released during construction. ▪ Regular posts during operation to announce milestone events.

The Stakeholder and Community Engagement Manager will provide the relevant reports, audits and management plans to the relevant organisations as required by the CoC.

6.2 Key messages

The key messages for the project will evolve as it progresses through different phases. These messages will be reviewed and updated at regular intervals to ensure they remain relevant to the construction and operational phases of the project.

6.2.1 Construction phase messages

- The ARRC will be constructed in accordance with all environmental management plans and the conditions of SSD-10446, ensuring compliance with strict environmental and regulatory standards.
- Regular environmental inspections will be conducted by the Independent Environmental Representative (ER) to monitor compliance and minimise environmental impacts.
- Construction activities will be carefully managed to minimise disruption to the community, including noise, dust, vibration, and traffic impacts.
- Advance notifications will be provided to affected residents and businesses regarding construction activities, particularly high-noise-generating works, vibration-intensive activities, and any necessary traffic changes.
- Stakeholders will have multiple channels to raise concerns or provide feedback throughout the construction phase, including the project website, dedicated phone line, and community meetings.

6.2.2 Operational phase messages

- The ARRC will significantly contribute to environmental sustainability by recycling up to 85% of construction and demolition waste.
- The ARRC will reduce landfill, lower greenhouse gas emissions and promote the reuse of valuable materials while aligning with broader environmental goals for Western Sydney and beyond.
- It will become a vital economic driver for the region by creating a substantial number of long-term jobs, stimulating local employment and economic growth.
- The ARRC will be a hub of innovation, employing advanced technologies to process and repurpose waste materials.
- The ARRC will set a benchmark for sustainable waste management practices in Australia, showcasing cutting-edge solutions to environmental challenges.
- By providing a sustainable solution for managing construction and demolition waste, the Centre will facilitate the growth and development of the Western Sydney Aerotropolis, ensuring the region's expansion is both economically and environmentally sustainable.

6.3 Sensitive receivers

SSD-10446 requires a specific procedure to be implemented for consulting with nearby sensitive receivers regarding high noise-generating works, vibration-intensive activities, traffic disruptions, operational noise and traffic management.

The purpose of this procedure is to outline the project team's approach to meeting the reasonable expectations of the community as well as the consultation and notification requirements under this condition

The project's sensitive receivers are identified in the project's EIS Appendix J - Noise and Vibration Impact Assessment and are outlined in Table 6.2.

Table 6.2 Sensitive receivers

ID	Address	Classification
R1	2161-2177 Elizabeth Drive, Luddenham	Residential
R2	2111-2141 Elizabeth Drive, Luddenham	Residential
R3	285 Adams Road, Luddenham (not occupied)	Residential
R4	5 Anton Road, Luddenham	Residential

ID	Address	Classification
R5	185 Adams Road, Luddenham	Residential
R6	225 Adams Road, Luddenham	Residential
R7	161 Adams Road, Luddenham	Residential
R8	2510-2550 Elizabeth Drive, Luddenham	Residential
AR1	Hubertus Club outdoor firing range	Active recreation
C1	Hubertus Club restaurant (including outdoor facilities)	Commercial

This procedure will apply to the sensitive receivers listed in the above table.

6.3.1 Consultation procedure for sensitive receivers

To ensure meaningful engagement with sensitive receivers, a structured consultation process will be implemented prior to scheduling high-noise-generating works, vibration-intensive activities, and traffic disruptions during construction.

The consultation process will include the following steps:

Step 1: Early Consultation – Scheduling discussions with impacted stakeholders

At least one month prior to planned high-noise-generating works, vibration-intensive activities, or traffic disruptions, the project team will engage with affected stakeholders to discuss the schedule and mitigation strategies.

- Consultation methods:
 - Online and phone surveys to gather feedback on preferred work scheduling and mitigation.
 - One-on-one meetings with directly impacted residents and businesses.
 - Stakeholder briefings for affected community groups.
- Consultation objectives:
 - Determine stakeholder preferences regarding timing and scheduling of works.
 - Identify potential concerns related to noise, vibration, and traffic.
 - Explore possible mitigation strategies, such as adjusted working hours, alternative routes, or additional noise reduction measures.

Step 2: Confirmation of work schedule based on community input

The project team will review stakeholder feedback and where feasible, incorporate it into the construction schedule to minimise community disruption.

Stakeholders will be notified of finalised schedules through:

- Written correspondence (email, letterbox drop, or SMS alerts).
- Phone calls with affected stakeholders.
- Updated project website notifications.

Step 3: Ongoing consultation and adaptive scheduling

Consultation will be ongoing throughout construction, with regular opportunities for stakeholders to provide feedback. The project team will adapt scheduling where feasible and reasonable, based on community concerns and construction progress. The Stakeholder and Community Engagement Manager will be available to discuss issues related to high-noise or vibration-intensive works and traffic disruptions.

6.3.2 Notification process

In addition to the consultation process outlined in Section 6.3.1, a structured notification process will ensure that sensitive receivers receive timely and accessible updates before and during high-noise-generating works, vibration-intensive activities, traffic disruptions, operational noise, and traffic management.

Notifications will be tailored to stakeholder preferences, ensuring clear, relevant, and actionable information is provided at each stage of construction.

Table 6.3 Notification timeline

	Step 1 - Look Ahead	Step 2 - Monthly updates	Step 3 – Final work notification
Timing	Provide a six-month look - ahead of impactfull work to all potentially impacted residents.	Notification issued every month advising upcoming work to potentially impacted noise receivers.	Notification 7 days prior to work.
Content	Description of types of OOHW, notification process, re-engagement requirements and complaints.	General notification outlining programmed impactful for three months.	Notification of specific works. To include contact details for complaints / concerns.
Distribution	All sensitive receivers. Method Letterbox drop / face-to-face meeting. Email.	All sensitive receivers Method Letterbox drop (where contact details unknown). Email or text (where contact details are known).	All sensitive receivers Method Letterbox drop (where contact details unknown). Email or text (where contact details are known).

6.4 Evaluation

The effectiveness of the project communications and engagement activities will be gauged through regular audits as well as surveys of community and stakeholders and data analysis. These will be evaluated in terms of the communications and engagement goals, objectives, risks and opportunities as outlines in this CCP.

7 RISKS, ISSUES AND MITIGATIONS

7.1 Project, community and reputation risks

Some of the potential risks to the project, community and reputation of CPG, and ways to mitigate these risks, are outlined below in Table 7.1.

Table 7.1 Risks

Risks & issues	Details	Mitigation
Project benefits (long term)	The project benefits are not fully realised.	Build a positive and strong narrative to capture the essence of the overarching benefits of the ARRC.
Construction impacts	Impacts to nearby residents and businesses during construction, including increased traffic, dust generation and elevated noise levels.	Information going to the community to be consistent, reliable, trustworthy, accurate and timely. Face-to-face meetings.
Operation impacts	Impacts to nearby residents and businesses during operation.	Information going to the community to be consistent, reliable, trustworthy, accurate and timely. Face-to-face meetings.
Perception of property values	Residents' incorrect belief that property prices will be reduced due to the project.	Articulate the community benefits and improvements this project will make.

7.2 Opportunities

Some opportunities the project presents to highlight the positive nature of the ARRC are outlined below:

- Strong national and geopolitical movement about the circular economy.
- Stimulation of local, regional economies and businesses.
- Educated and informed community to support/promote circular economy projects.

8 COMPLAINTS AND ENQUIRIES MANAGEMENT

The following section outlines the approach to managing complaints received during the construction phase and operation of the project. A complaint is defined as an interaction with a community member or stakeholder who expresses dissatisfaction with activities, staff members, actions or proposed actions.

Complaints are to be dealt with in a responsive manner to ensure stakeholders feel their concerns and issues raised have been taken seriously and that remedial action, where applicable, is to be carried out. This CMS complies with the Australian Standard AS ISO 10002:2006 Customer Satisfaction – Guidelines for complaint handling in organisations.

Complaints can be considered an incident or occurrence identified by a stakeholder as unsatisfactory, incorrect or inappropriate. The communications team will clarify whether an event is a complaint by confirming verbally with the complainant that they would like to raise a complaint. To maintain equity in complaint handling:

- All complainants are to be treated with respect and fairness.
- All complaints are to be considered on their merits.
- The substance of a complaint dictates the level of resources dedicated to it, not a complainant's demands or behaviour.

8.1 Responsibilities

Complaint handling is the responsibility of all team members who interact with the community and stakeholders. Any team member who receives a complaint must:

- Immediately refer it to the community engagement team.
- If the issue can be resolved on the spot, the team member should do so and then provide details to the engagement team for recording in the complaints register within 24 hours.
- Ensure all staff are familiar with the complaints handling procedure and escalation process.

The Stakeholder and Community Engagement Manager is responsible for:

- Receiving and responding to all calls made to the project phone number.
- Investigating and determining the source of complaints promptly.
- Acknowledging email complaints within one business day and providing a final response within 10 business days if not resolved immediately.
- Recording all complaints in the complaints register within 24 hours.
- Providing the complaints register to the Independent Environmental Representative daily, in accordance with Condition A42.
- Escalating complaints as per the dispute resolution process outlined in Section 8.5.

A flowchart showing the path the team will take to manage complaints is Figure 8.1.



Figure 8.1 Complaints process

8.2 Receiving complaints and enquiries

A dedicated complaints and enquiries system has been established, including:

- **Project email:** info@luddenhamrecycling.com.au
- **Postal address:** Level 5, 2 Grosvenor Street, Bondi Junction, NSW 2022
- **Toll-free community contact number:** 1800 403 265

In accordance with Condition B110(g)(ii), these contact details will be advertised:

- In a local newspaper prior to construction and again before the commencement of operations.
- On-site signage at key project locations, ensuring visibility to community members.
- On the project website and included in community updates and newsletters.

Phone calls will be monitored during business hours, and all contacts will be acknowledged and responded to within the required timeframes outlined in Table 8.1.

All community and stakeholder interactions will be registered in the project's stakeholder database and included in the complaints register, which will be:

- Updated monthly and made publicly available.
- Provided to the ER daily, in compliance with Condition A42.

8.3 Recording and responding to complaints and enquiries

A complaints' register will be maintained and provided to the ER daily as per Condition A42. It will include:

- Date, time and nature of complaint.
- Type of communication (telephone, letter, meeting, other).
- Name, address and contact number of complainants.
- Action taken in response, including follow up contact with the complainant.
- Status of complaint (open, under investigation, resolved).
- Details of whether resolution was reached.
- Details of whether mediation was required.
- Any monitoring undertaken to confirm resolution.
- Internal escalation process followed (if applicable).

A privacy collection statement will be included on the project website to make prospective complainants aware of their rights under the NSW *Privacy and Personal Information Protection Act 1998*.

8.4 Responding to complaints and enquiries

The Stakeholder and Community Engagement Manager will co-ordinate with project staff to ensure complaints are responded to, and corrective or preventative action initiated, within a timely manner. The Stakeholder and Community Engagement Manager will work with the project team to ensure complaints are responded to - and corrective or preventative action initiated - within a timely manner. The target response times are summarised in the table below.

General enquiries will be recorded on a stakeholder database and will include as much information as possible about the stakeholder.

If an enquiry is received during business hours it will be acknowledged the same day and, if possible, responded to within 24 hours (Table 8.1). If the enquiry is more detailed or complex, a response will be provided within five business days.

If an enquiry is received out of business hours, it will be acknowledged and responded to, if possible, the next business day. At all times enquiries will be treated with the utmost importance and project members will be required to respond to them as quickly as possible, noting the above time frames.

Table 8.1 Complaint and enquiry method

Complaint / Enquiry method	Timing	Response times
Phone call, text or personal contact	During business hours	Within one business day.
	Out of business hours	Morning of next business day.
Written (email or letter)	During business hours	Acknowledge within one business day. Written response within 10 business days.
	Out of business hours	Acknowledge morning of next business day. Written response within 10 business days of acknowledgement.

All telephone complaints and enquiries received during business hours will be answered by a nominated communications representative.

Any complaints which require longer than five days to resolve will be brought to the attention of the project leadership team. The project leadership team will also be notified within two hours of any complaint or issue that is likely to attract media or political attention.

All staff managing complaints will be aware of the complaints handling process and their responsibilities.

8.5 Dispute resolution process

To ensure effective resolution of disputes during the construction and operational phases, the following four-step process will be followed:

Step 1: Initial assessment and resolution

1. All complaints will be acknowledged within one business day and assessed for resolution.
2. The Stakeholder and Community Engagement Manager will work to resolve the issue at the first point of contact where possible.

Step 2: Escalation to internal review

3. If a complaint cannot be resolved within five business days, it will be escalated to the project leadership team for review.
4. The complainant will receive regular progress updates until the issue is resolved.

Step 3: Involvement of the independent Environmental Representative

5. If a complaint remains unresolved, it will be referred to the ER for review and recommendations, as per Condition A42.
6. The ER will assess the complaint and provide formal recommendations for resolution.
7. The project team must implement the ER's recommended resolution within five business days, unless further investigation is required.

Step 4: Referral to external mediation (if required)

8. If the complaint is still unresolved, it may be referred to an independent mediator.
9. Mediation outcomes will be documented, and agreed resolutions will be implemented within five business days.

9 ACCESS TO INFORMATION

To promote transparency and accessibility, project-related information and key documents will be made publicly available on the project website and kept up to date in accordance with Condition C20.

9.1 Publicly available information

At least 48 hours before the commencement of construction, and for the life of the project, the following information and documents will be made available online as they are obtained or approved:

1. Statutory and approval documents:
 - a. All documents referred to in Condition A2 of SSD-10446.
 - b. All current statutory approvals for the development.
2. Project strategies, plans, and compliance Reports:
 - a. All approved strategies, plans, and programs required under the conditions of this consent.
 - b. Proposed staging plans if construction, operation, or decommissioning is staged.
3. Environmental performance and monitoring reports:
 - a. Regular reports on the environmental performance of the development, in accordance with reporting requirements outlined in relevant plans and programs.
 - b. A comprehensive summary of environmental monitoring results, as specified in SSD-10446 and supporting project documents.
4. Project updates and stakeholder engagement:
 - a. A summary of the current stage and progress of the development.
 - b. Contact details for enquiries and complaints.
 - c. A complaints register, updated monthly.
5. Audit and compliance reporting:
 - a. Independent Audit Reports, including the CPG's response to audit recommendations.
6. Additional information:
 - a. Any other information required by the Planning Secretary.

9.2 Updating and maintaining publicly available information

All public information related to the development will be:

- Updated as soon as new documents are obtained or approved.
- Reviewed at least quarterly to ensure compliance with Condition C20.
- Accessible to stakeholders in an easily navigable format on the project website.

The Stakeholder and Community Engagement Manager will be responsible for maintaining and ensuring the accuracy of publicly available documents.

9.3 Complaints register and contact details

To ensure transparency and accessibility, the complaints register will be:

- Updated monthly and made available on the project website.
- Provided to the ER daily, as per Condition A42.
- Maintained in compliance with Section 8 of this plan.

Project contact details for enquiries and complaints will be:

- Published on all public-facing materials, including the project website, on-site signage, and newspaper advertisements.
- Prominently displayed on the homepage of the project website.

9.4 Stakeholder notifications and communication

To ensure ongoing community engagement and compliance with Condition C20, the following actions will be undertaken:

- Publication of major project updates at least every six months during construction and annually during operation.
- Targeted stakeholder emails and notifications where applicable.
- Access to key documents on-site for in-person review, if required.

APPENDIX 1

The CoC requires contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties (RAPs) and other interested stakeholders to be included in this CCP. These details are listed in the below table.

Stakeholder group	Stakeholder	Phone Number	Email address
Regulatory authority	NSW DPHI	1300 305 695	information@planning.nsw.gov.au
	NSW EPA	131 555	info@epa.nsw.gov.au
	Liverpool City Council	1300 362 170	lcc@liverpool.nsw.gov.au
RAPs	Gandangara Local Aboriginal Lands Council	9602 5280	reception@glalc.org.au
	Didge Ngunawal Clan	0426 823 944	didgengunawalclan@yahoo.com.au
	Goodradigbee Cultural and Heritage Aboriginal Corporation	4729 1671	info@gcahac.org.au
	Kamilaroi-Yankuntjatjara Working Group	0434 545 982	philiokhan.acn@live.com.au
	Wailwan Aboriginal Group	0436 483 210	waarlan12@outlook.com
	Waawaar Awaaa Aboriginal Corporation	0410 580 962	waawaar.awaa@gmail.com
	Dharug Ngurra Aboriginal Corporation	9622 4081	info@darugngurra.org.au
	Galamaay, Cultural Consultants	0401 871 526	galamaay@hotmail.com
	Cubbitch Barta Clan	4684 1129	kgchalker@bigpond.com
	Yulay Cultural Services	0411 048 794	yulayculturalservices@gmail.com
	Wurrumay Pty Ltd	0421 077 521	wurrumay@hotmail.com
	Butucarbin Aboriginal Corporation	9832 7167	butuheritage@gmail.com
	Guntawang Aboriginal Resources	0414 964 657	wenlissa01@hotmail.com
	A1 Indigenous Services	0411 650 057	cazadirect@live.com
	Barraby Cultural Services	0423 906 606	barrabyculturalservices@gmail.com
	Yurrandaali Cultural Services	0457 546 643	yurrandaali_cs@hotmail.com
Other interested stakeholders	Workers Hubertus Country Club	4773 4444	bwc@bwcl.com.au
	Circular Australia (formerly NSW Circular)		Contact is made via a form on their website – circularaustralia.com.au
	Sensitive receivers		Contact details are confidential



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