

February 2024 - LPRWF SSD-6696-Mod-1 SUBMISSION

Please accept my submission as comment on the Amendment for the LPRWF TWA Facility

- In principle, as a requirement of construction of an already approved project, I agree with the location selection of the TWA Facility.
- I see it crucial that DPHI in the assessment process, construct conditions around the following:
 - The applicant must prioritise the consideration and mitigation of all relevant neighbour concerns.
 - Ensure there is sufficient and documented ongoing monitoring and assessment processes in place for all community impacts created by the TWA facility. There must be a clear process for the applicant, community and Council to collaborate and mitigate any and all impacts as they arise. Particularly since not all information is available to both Council and Community at this time of exhibition.
 - If not already required or in place, a required ongoing formal communication structure requirement for the Project owner, community and Council for the entire operation and decommissioning period. This should provide community and Council with the ongoing opportunity to collaborate.
 - Ensure that the provision of essential services for the Coolah and Cassilis communities are not impacted by the Temporary Workforce requiring access and utilisation of such services. Predominantly health and emergency services. The hosting of this TWA Facility should NOT IMPACT on any community member being able to access services that are already quite difficult to access.
 - NO Community Benefit Fund money should be utilised to bolster essential services for the community, if they need bolstering to aid in the continuation of such services due to the increased demand imposed by the TWA Facility, this should be funded by the applicant as part of the successful delivery of the TWA Facility and not be taken out of any Community Benefit Fund.
 - On site medical staff and trained first aid and emergency service personnel should be a priority mitigation measure.
 - The design and planning of the TWA Facility to ensure that there will be sufficient independent emergency resources, should an emergency occur eg. Bushfire/grassfire/emergency requiring whole of TWA Facility evacuation. SO as not to drain existing community emergency service resources in the event of a considerable emergency eg. Sir Ivan Fire 2017
 - *Page 24 Amendment Report: Tilt Renewables would obtain a Water Access Licence (WAL) from WaterNSW to extract water for specific supply to the proposed TWA Facility.*

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It is expected this would be a licence to transfer water rather than a new WAL and include a Zero Share Transfer from within the same groundwater source area (Sydney Basin Murray Darling Basin Groundwater Source Area). At present there is more than 10,000 ML available for trading within the Sydney Basin Murray Darling Basin Groundwater Source Area and Tilt Renewables are currently consulting with several WAL holders to secure a Zero Share Transfer.

To activate ongoing monitoring and assessment of water availability and utilisation? As indicated by the applicant there is 10,000ML available for trading, which indicates that the water allocation is currently under-utilised. Given this, I believe ongoing monitoring of the groundwater source area, total water utilised vs allocated, and cumulative usage/impacts (from all other projects and uses) is important and should be a required condition.

- Due to time constraints, I have not read any technical information about erosion control or flood mitigation for the TWA Facility and would hope that any necessary mitigation practices are included or be included as a condition of consent.
- *Page 28 of the Amendment Report Tilt Renewables met with WSC in relation to site selection. No specific issues were raised in relation to the development of a temporary workforce accommodation facility however WSC were particularly interested in what legacy infrastructure may be left for the community*
I think it is paramount that the Applicant commit to offering a specified number of transportable buildings as a commitment for legacy infrastructure post TWA Facility requirements, the cost to move the transportable buildings to the specified locations in Community be covered by the applicant. With 600 rooms proposed, could 10-20% of these rooms be earmarked for legacy infrastructure opportunities for both Cassilis and Coolah Communities? This type of infrastructure could be utilised at public venues such as Showgrounds, Recreation Grounds, Sporting facilities (as offices or change-rooms?) Hospitals. This could represent a valuable collaboration opportunity for Community, Councils and the applicant, and is in direct alignment with the IAP2 Spectrum for Public Participation as mentioned on *page 33 of the Amendment report*

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- I find the opportunities for Community to actively be “Involved”, “Collaborated” or “Empowered” as suggested in the IAP2 Framework to be lacking and suggest that the applicant could demonstrate (and evidence) further opportunities for this to occur. I find that most commonly “Informing” and “Consulting” continue to be the standard level of participation offered to community. Eg. Community information sessions, drop-in sessions, documents on public exhibition, surveys etc

IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

INCREASING IMPACT ON THE DECISION					
	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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- The Amendment report and associated Temporary Workforce Accommodation facility preliminary design can really only be fully and fairly considered and assessed by community and by Council with the **INCLUSION and PUBLICATION** of the Bushfire Emergency Management Plan, Waste Management Plan, Environmental Management Plans and any other required Management Plans with detailed design. I would hope that community will get an opportunity to review (and provide feedback) such Management Plans and the detailed design before final approval is granted.
- All details regarding licences and permits required for services and utilities associated with the construction and operation of the TWA Facility are indicated to be confirmed in detailed design and outlined in the relevant Environmental Management Plans (EMPs) and as such, community should be able to provide feedback on such planning and management mechanisms.