

West Dapto Urban Release Area and Adjacent Growth Areas – Proposed drinking water and wastewater services Communication Strategy

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5	Liz White	Sarah Mitchell	Catherine Mullins	13 September 2022	Updated references to names of infrastructure, position titles etc in accordance with latest Sydney Water structure. Changed all references of <i>contractor</i> to D4C as they are now Sydney Water's delivery partner in the South Region for the next eight years. Removed overlapping in roles and responsibilities tables and removed duplication of activities. Update reference to organisation names.

To know more or to make a revision of this Communication Strategy, call Sydney Water's Engagement Lead - South, Catherine Mullins, on 0409 462 308 or email catherine.mullins@sydneywater.com.au

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1 Introduction

1.1 Background and context

The West Dapto Urban Release Area (WDURA) and Adjacent Growth Areas (AGAs) are located about 15 kilometres southwest of Wollongong, in the Wollongong City and Shellharbour local government areas. About 30,000 new homes are planned for this area and about 500 hectares of non-residential development, to cater for population growth and employment generation in the Illawarra region up to 2048.

The WDURA is made up of the following precincts:

- Kembla Grange
- Sheaffes/Wongawilli
- West Horsley
- Cleveland
- Avondale
- Yallah/Marshall Mount.

The AGAs are:

- Tallawarra Lands
- Huntley
- Calderwood
- Tullimbar Village.

To meet additional demand for essential services to the WDURA and AGAs, Sydney Water will design, construct, operate and maintain drinking water and wastewater infrastructure (the project).

Sydney Water is responsible for providing drinking water and wastewater services to meet development timeframes set by the NSW Department of Planning and Environment (DPE). Construction will be staged to meet these timeframes (see Figure 1 for indicative location of infrastructure).

This Communication Strategy (CS) outlines the communication approach to be taken by Sydney Water and its contractors for the life of the project. Sydney Water will maintain and implement this CS during all stages of the project.

1.2 Environmental assessment and planning approval

In 2012 Sydney Water prepared an Environmental Assessment (EA) to assess the impacts of constructing and operating the project, which included consultation with key stakeholders and the community. The project was designed to avoid environmentally sensitive areas and Sydney Water committed to a range of measures to minimise adverse environmental impacts.

In 2013, the Minister for Planning approved the project under Part 3A of the *Environmental Planning and Assessment Act 1979* as follows:

- a concept approval to provide water and wastewater services for the West Dapto Urban Release Area (WDURA) and Adjacent Growth Areas (AGAs)
- a project approval to provide water and wastewater services for the WDURA first release precincts.

In 2016, the Minister for Planning and Infrastructure granted a modification to the concept approval that enabled the boundary of the concept approval to be aligned with the boundary of the project approval area. The modification also had the effect of removing equivalent or duplicate Minister's Conditions of Approval (MCoA). The project was then named "Water and Wastewater Servicing of the West Dapto Urban Release Area precincts of Kembla Grange, Sheaffes/Wongawilli and West Horsley".

This CS has been developed to address Minister's Condition of Approval (MCoA) for the work and provide a framework for community consultation and stakeholder engagement throughout the project. In accordance with MCoA D1, the CS must be approved by the Director General before construction begins. The CS was approved by the Director General of the NSW Department of Planning and Environment (now DPE) on 1 July 2014, prior to construction of the project. Tables summarising how this strategy meets the communications requirements of the MCoA and Statements of Commitment made by Sydney Water during the project's Environmental Assessment phase is provided in Section 12.

During future planning for this project, there may be some changes to the location and size of some infrastructure covered by the EA. Where this occurs, additional environmental assessments will be completed as required.

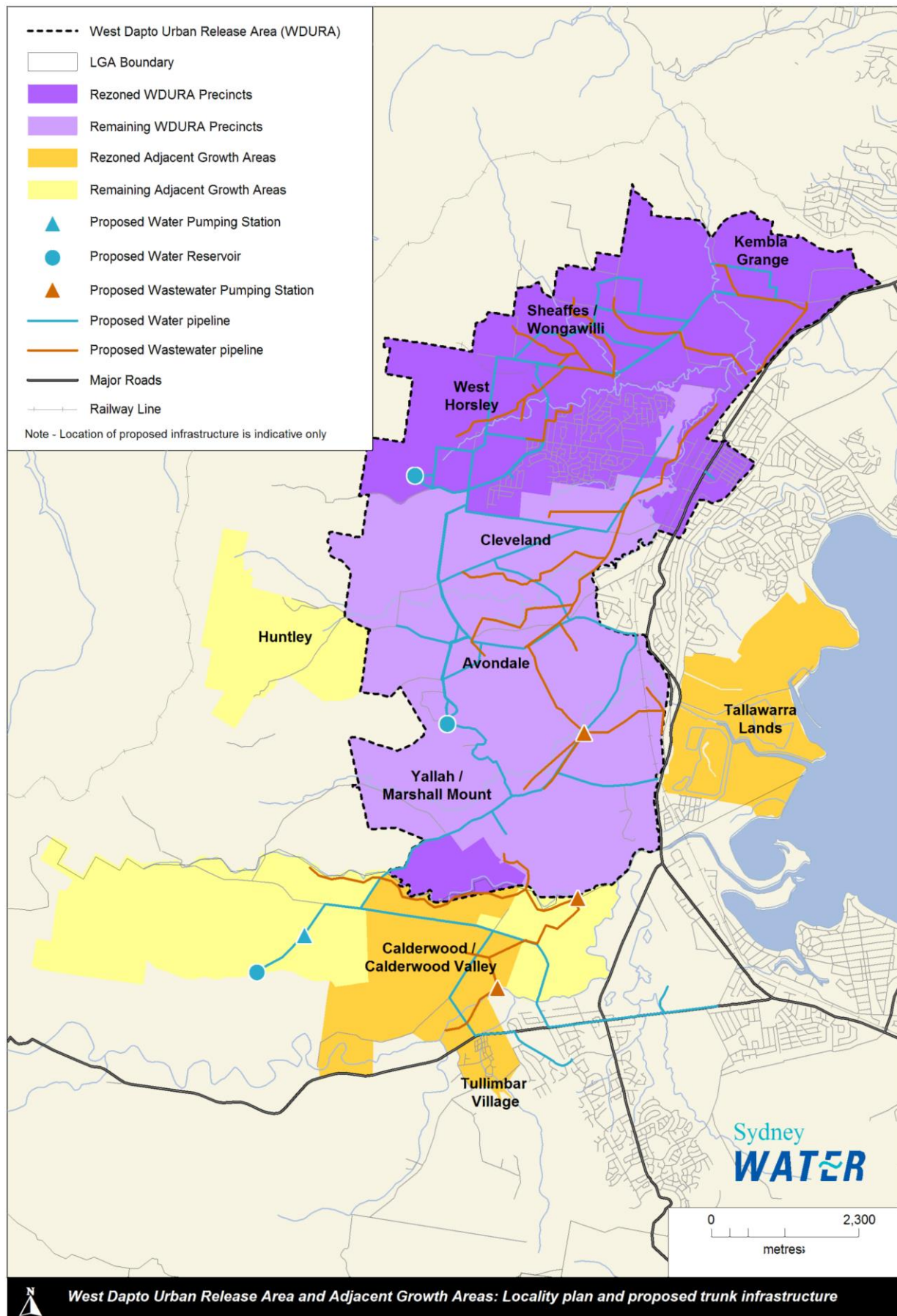


Figure 1: Map of WDURA and AGAs

2 Communications objectives

The level of engagement and communication activities will be flexible and tailored to the various stages of the project. This approach will be in line with Sydney Water's Policy and Guidelines for Community and Stakeholder Engagement.

Sydney Water is committed to open and honest communication with stakeholders. Respect and consideration for the community and stakeholders is a priority for the project.

Communication and interaction with the community will cover all stages of the project including work progress and management of construction and environmental impacts. It will be guided by the following key principles:

- engaging stakeholders early in the process
- ensuring stakeholders have easy access to information
- responding to all stakeholders contact in a timely manner
- being sensitive to the needs of the community
- honouring all commitments made by the project team, including those made during the Environmental Assessment phase
- making every effort to minimise the impact of work on the local community.

The overall communications approach will include, but not be limited to:

- notification and updates on construction to indirectly impacted residents
- meeting with directly impacted residents and providing them with regular updates
- pre-construction agreements (PCAs) with landowners of directly affected properties.

3 Key messages

The following key messages will be communicated by Sydney Water and its representatives throughout the project:

- About 30,000 new homes are planned for this area and about 500 hectares of non-residential development. Timing of servicing will be in stages, in accordance with Sydney Water's Growth Servicing Plan (GSP).
- The project includes the design, construction, operation and maintenance of:
 - 80 kilometres of new drinking water trunk pipelines
 - 45 kilometres of new wastewater trunk pipelines
 - one new drinking water pumping station (WPS)
 - five new drinking water reservoirs
 - three new wastewater pumping stations (WWPS) and upgrading three existing WWPSs
 - potential upgrade to the Wollongong Water Resource Recovery Facility (WRRF) and Shellharbour WRRF.
- The project will provide a range of social and economic benefits, including:
 - a secure drinking water supply
 - a reticulated wastewater service that protects public health
 - protection of catchment and river health
 - affordable and efficient drinking water and wastewater services to meet the NSW Government's development timeframes and support the orderly rollout of land releases and infrastructure.
- Sydney Water has developed the project to avoid environmentally sensitive areas and has committed to a range of measures to minimise adverse environmental impacts.
- Sydney Water will work with local residents and stakeholders to provide early and accurate information, as well as keeping the community and stakeholders informed throughout the project.

4 Community & Stakeholder Action Plan

Sydney Water's delivery partner for the south region, Delivering 4 Customers (D4C), will complete the design and construction of the project's various stages. D4C will represent Sydney Water and will work closely with stakeholders and local residents to keep them informed, proactively identify and manage potential issues, and deal with daily enquiries and concerns. For each stage of work, D4C will develop a *Community & Stakeholder Action Plan* (CSAP) to address community and stakeholder issues specific to each stage of work, and describe how they will meet the requirements outlined in the CS, required by the MCoA and Sydney Water's policies. In addition to wider community and stakeholder concerns, CSAPs will address how contractors will consult with landowners in areas where infrastructure will be located. The CSAP will be approved by Sydney Water before the start of any work or possession of a site. Sydney Water will not seek DPE approval of CSAPs.

D4C will have a qualified and experienced community engagement advisor (CEA) to manage community engagement. The CEA will prepare and implement the CSAP and be a primary contact for Sydney Water, the Environmental Representative and community stakeholders regarding the project. Sydney Water's South Engagement Lead will provide advice on community engagement matters and will support the CEA. If a community engagement issue or customer dispute cannot be resolved through the complaint management procedures (see Section 9.2), it will be escalated by the Sydney Water Project Manager through to senior management. If the issue is still unable to be resolved, the customer can refer the matter to the Energy and Water Ombudsman of NSW (EWON), who can provide independent dispute resolution.

5 Communication activities and tools

The communication activities and tools used in this project will be supervised and approved by Sydney Water, but managed by D4C and will include (but not be limited to):

- direct mail letters to local community and relevant stakeholders
- advertising (including contact details)
- information sessions
- fact sheets
- Sydney Water Talk website, established before construction starts, to include:
 - information on current project status
 - links to planning approval documents on the DPE website
 - a description of the current environmental approvals, licenses or permits obtained for the project
 - a list of related strategies, plans, documents and programs required by the project approvals
 - the outcomes of compliance tracking
 - contact information for community enquiries and complaints, including telephone number, postal address and email address
- site signage at each construction site (including contact details)
- project specific 1800 information line
- 24-hour contact telephone number (13 20 90)
- community newsletters
- information to be provided for Sydney Water media releases
- notifications to Sydney Water Customer Hub through What's Happening In My Suburb (WHIMS)
- meetings and presentations
- Notices of Entry (NOEs)
- calling cards
- electronic email update subscriptions
- SMS and social media as required
- pre-construction agreements (PCAs).

All communication materials will be produced following the Sydney Water Community Engagement document review and approval mechanism process.

A CSAP will be developed by D4C, and will detail communications activities and consultation to occur during each phase of the project.

6 Key external stakeholders

Stakeholder communication and engagement will be key to the project's success, and early, effective communication will ensure stakeholder needs and requirements are addressed. Required engagement levels will vary depending on the stage of the project, impact of the project on the stakeholder and their previous contact with Sydney Water, with individual CSAPs to provide appropriate, tailored communication in each stage. Communication will also include consultation around the management of environmental concerns during construction.

Sydney Water has already consulted with key stakeholders in the initial stages of the project, including community information sessions, and responding to submissions following public display of the EA. Sydney Water and D4C will continue to inform stakeholders throughout the project.

Key external stakeholders include:

- Wollongong City Council
- Shellharbour City Council
- Illawarra Urban Development Committee (IUDC)
- elected council representatives (Mayors/Councillors from the above council areas)
- NSW Government bodies including, but not limited to:
 - NSW Environmental Protection Authority (EPA)
 - Office of Environment and Heritage (OEH)
 - NSW Department of Planning and Environment (DPE)
 - Transport for NSW (TfNSW)
 - utilities such as electricity, gas and rail service providers
- relevant Federal Government Departments
- NSW Government Ministers
 - Minister for Planning
 - Minister for Lands and Water
 - Minister of Environment and Heritage
- State Members of Parliament for
 - Shellharbour
 - Wollongong
 - Kiama
 - Keira
- Aboriginal stakeholders and other special interest groups
- directly and indirectly affected landowners
- existing businesses within the project area
- existing communities in the project area
- environmental and cultural heritage groups
- community groups:
 - pro and anti-development
 - environmental
- community members who attended information sessions in previous phases of the project
- landowners who earn income from their land (for example market gardeners and farmers)
- groups from non-English speaking backgrounds
- Developers, Project Managers and Consultants.

7 Issues management

Effective management of planning, construction and environmental impacts will be essential to maintaining a good working relationship with the community.

Sydney Water's Project Manager must be aware of the impacts of this work on the surrounding community. Appropriate work methods and operations will be incorporated in project plans to minimise the impacts.

Before start of work at a site, the CEA will follow Sydney Water's working on private property procedures when required. As part of effective issues management, the CEA will be available to go on site or have meetings with Sydney Water, landowners or other stakeholders to deal with issues immediately or without delay, as required.

7.1 Potential issues for consideration

The project poses a number of potential impacts to the community and stakeholders that, if poorly managed, could pose risks to the project. Experience on similar projects has shown that there are a number of stakeholders who are unhappy about the releasing and rezoning of land in growth areas and would like to keep their rural lifestyles. There are also several stakeholders who would like to develop their land quickly and feel that Sydney Water is "holding them up" by not delivering services quickly. The table below summarises some of the potential project risks to the community and stakeholders.

Potential impacts to the community	Potential risks to the project	Mitigation strategy
Landowners directly impacted by planned infrastructure and potential property acquisition (especially neighbours to WWPS) impacts timely progress of project.	Landowners could lobby local politicians or contact the media, resulting in reputation damage or project delays.	<ul style="list-style-type: none">• Ensure early, honest and in-person communication with directly impacted landowners through one-to-one meetings and tailored communication tools (specialised maps of their property for example).• Pre-construction agreements.
Community confused over Sydney Water's role in growth leads to community dissatisfaction to growth in the area.	Community protests, lobbying local politicians/media to stop project. Impacts timely progress of the project.	<ul style="list-style-type: none">• Provide regular updates on project status and schedule.• Create clear distinction between responsibilities of Sydney Water and other government agencies (for example DPE or councils).
Community and other stakeholders do not receive information about the project.	Stakeholders feel they are being deliberately left out of the process and lobby politicians/media about their concerns.	<ul style="list-style-type: none">• Develop a comprehensive database of stakeholders.• Advertisements in local papers.• Updated website.• Ongoing community updates.
Disgruntled landowners impacted by construction of assets but who won't be serviced by the work.	Landowners could lobby politicians/media about their concerns and impact timely delivery of the project.	<ul style="list-style-type: none">• Ensure early, honest and in person communication with directly impacted landowners through one-to-one meetings using tailored communication tools.• Develop pre-construction agreements in consultation with the landowner so they understand what will happen on their property and are satisfied with Sydney Water's commitment to restoring their property.

Potential impacts to the community	Potential risks to the project	Mitigation strategy
Project not delivered to promised timeframes. Developers not able to connect customers to drinking water and wastewater, need to find interim solution.	Sydney Water seen as not delivering on promises to stakeholders.	<ul style="list-style-type: none"> Communicate effectively with stakeholders to ensure they are kept informed of project progress so that they aren't surprised by any changes in time frames.
Environmental controls put in place are ineffective and cause a breach in Sydney Water's conditions of approval.	Potential impacts to the environment resulting in fines for Sydney Water. Sydney Water seen as not implementing effective environmental controls and sustainably irresponsible.	<ul style="list-style-type: none"> Work with environment team to ensure effective environmental controls are in place. Ensure open and honest communication in case of a breach.
Community and other stakeholders do not receive appropriate information about construction work and impacts.	Community and stakeholders feel they are not being kept informed, lobby politicians/media about their concerns, cause delays in the project.	<ul style="list-style-type: none"> Develop a comprehensive stakeholder database and ensure it is used regularly. Enter all complaints into Sydney Water's customer management system within 24 hours of receipt. Ensure early notification of impacts and regular impacts. Provide access for landowners and community members to sign up for regular email updates about the project.
Government agencies not appropriately consulted.	Government agencies delay the project.	<ul style="list-style-type: none"> Keep government agencies informed throughout the project. Briefings and one to one meetings.

7.2 Media

D4C will provide Sydney Water with timely updates on construction activities. Media releases will be prepared and issued by Sydney Water's media unit as required. Media enquiries will be referred to Sydney Water's media unit who are available at all times on 8849 5151.

8 Community impacts

Other potential social or community impacts relating to the project, which will be managed and mitigated at all stages, include:

- access to private land and government property
- land acquisition for new infrastructure
- impact on land values due to location of infrastructure
- disturbance to land and other construction and operational impacts including noise, dust, odour, vibration, sediment, visual impact, restoration, traffic and access interruption of current water and wastewater services
- clearance of existing vegetation
- availability of easements and open space for infrastructure
- disturbance to Lake Illawarra and other sensitive environmental and community sites.

9 Communication management

9.1 Communications for different types of infrastructure

The project includes a wide variety of different types of construction, each requiring specific community engagement actions. The CSAP will use the following as a guide for their activities. These are outlined in the table below.

Type of infrastructure	Stakeholder engagement requirements
Reservoirs	<ul style="list-style-type: none">• Negotiation with landowners around property acquisition and asset location• Pre-construction agreements• Stakeholder consultation and communication
Drinking water trunk pipelines – new	<ul style="list-style-type: none">• Negotiation with landowners around location of infrastructure• Pre-construction agreements• Stakeholder consultation and communication
Drinking water trunk pipelines – upgrade	<ul style="list-style-type: none">• Pre-construction agreements• Stakeholder consultation and communication
Drinking water pumping station	<ul style="list-style-type: none">• Negotiation with landowners around property acquisition and asset location• Pre-construction agreements• Stakeholder consultation and communication
Drinking water pressure reducing valves	<ul style="list-style-type: none">• Negotiation with landowners around property acquisition and asset location• Pre-construction agreements• Stakeholder consultation and communication
Wastewater pumping stations – new	<ul style="list-style-type: none">• Negotiation with landowners around property acquisition and asset location• Pre-construction agreements
Wastewater pumping stations – upgrades	<ul style="list-style-type: none">• Pre-construction agreements if not on Sydney Water owned land• Stakeholder consultation and communication
Wastewater trunk pipelines – new	<ul style="list-style-type: none">• Negotiation with landowners around location of infrastructure and asset location• Pre-construction agreements• Stakeholder consultation and communication
Wastewater trunk pipelines – upgrade	<ul style="list-style-type: none">• Pre-construction agreements• Stakeholder consultation and communication
Upgrade existing water resource recovery facilities	<ul style="list-style-type: none">• Community consultation around construction impacts
Vent shafts, maintenance holes	<ul style="list-style-type: none">• Negotiation with landowners around property acquisition and asset location• Pre-construction agreements

9.2 Complaints management

All complaints are to be managed in accordance with Sydney Water's customer complaints procedure and recorded in Sydney Water's Customer Relationship Management System (SAP CRM). Information will be recorded for all complaints and will include:

- the date and time of the complaint
- the means by which the complaint was made (telephone, mail or email)
- any personal details of the complainant that were provided, or if no details were provided, a note to that effect
- the nature of the complaint
- the details of actions taken by Sydney Water to resolve the complaint, including any follow-up contact with the complainant, or if no action was taken in relation to the complaint, the reason/s for this.

At a minimum, the following will be available for community enquiries and complaints for the duration of the project:

- a 24-hour telephone number through which complaints and enquiries may be registered (13 20 90)
- a postal address to which written complaints and enquiries may be sent
- an email address to which electronic complaints and enquiries may be sent
- a mediation system for complaints unable to be resolved.

If a community engagement issue or customer dispute cannot be resolved through the complaint management procedures, it will be escalated by the Sydney Water Project Manager through to senior management. If the issue is still unable to be resolved, the customer can refer the matter to the Energy and Water Ombudsman of NSW (EWON), who can provide independent dispute resolution.

Sydney Water will publish project specific contact details on its Sydney Water Talk website www.sydneywatertalk.com.au and on signage at construction sites. Advertisements will also be published in local newspapers before construction, at least once every six months during construction and before new infrastructure begins operating.

In addition to tracking complaints by category, they will also need to be categorised in terms of whether they are an **avoidable complaint**. An avoidable complaint is any complaint (direct or third party) that results from not following approved procedures and mitigation measures.

Examples may include, but are not limited to, the following:

- crews working outside of standard working hours, where this can be proven
- work exceeding OEH noise guidelines where agreed mitigation measures were not followed
- crews entering property without checking that notifications had been sent or first asking permission
- not following procedures and mitigation measures outlined in the CSAP and environmental documentation
- crew behaviour that deviates from protocols outlined in the CSAP and crew induction
- any action that really could have been avoided, and if it had been would not have resulted in a complaint
- not honouring community commitments outlined in the CSAP or notifications to the community
- any complaint received by the site supervisor must be forwarded to Sydney Water's Project Manager and CEA immediately. Simple complaints may be resolved by staff on site, who must provide the information to the CEA by either email or a Record of Contact form. However, they must still be passed on within two days to the CEA and Project Manager.

9.3 Customer and stakeholder contact management

Telephone calls, correspondence and emails received must be responded to promptly. All customer telephone calls to Sydney Water or D4C should be responded to within eight business hours. Written correspondence must be responded to within five working days, with complaints to receive a response within 48 hours.

This may be an acknowledgement response outlining what is being done to address the issue, while final resolution of the issue may take longer depending on the complexity of the issue. In accordance with the MCoA, the response and any subsequent action will be recorded and provided within two weeks of the original complaint, or as otherwise agreed by the complainant.

All community and stakeholder contacts relating to the project, whether to Sydney Water or D4C, will be recorded in SAP CRM and in a customer database (Consultation Manager will be available for use by D4C). Contacts include verbal contact (such as by telephone or face-to-face during formal appointments) or written correspondence. The record of complaints will be made

available to the Director-General (now Secretary for the Department of Planning, Industry and Environment) for inspection upon request.

9.4 D4C community engagement protocols

D4C will adopt the Community Engagement Protocols outlined below:

- residents impacted by construction to be advised of general project information by an *initial letter* at least 28 days before work starts
- directly impacted residents contacted/door knocked by CEA at least 28 days before work starts – consultation to take place and any issues dealt with
- consultation with affected landowners throughout all phases of the project
- residents advised with *detailed letter* at least 7 days before work starts
- residents advised no less than 48 hours when there are changes to work plans
- crews to start work on time and during specified timeframes
- crews to wear photo identification cards at all times
- crews to have copy of Certificate of Authority to verify they are authorised to work for Sydney Water
- crews to display project site signage. When using A-frames at least two signs per site, one at each end of the work area
- crews to observe agreed working hours
- crews to be helpful, friendly, courteous, polite and professional to the customer at all times, and not abusive in any way
- crews to take a personal approach when dealing with customers
- crews to leave the work site the way they found it and tidy at the end of each day
- when working on private property a pre-construction agreement is to be completed and adhered to
- crews to enter/exit work sites in a quiet manner without disruption to residents or the community
- if access to private property is required, crews will follow Sydney Water's relevant Notice of Entry (NOE) procedures
- a NOE is required to serve formal notification of entry onto private property without the consent of the owner for any one or more of the following purposes: to build, operate, repair, maintain, remove, extend, expand, connect, disconnect, improve or do any other things that Sydney Water considers are necessary or appropriate to any of its work or to construct new work, for these purposes
- the occupant and landowners must be given at least two days written notice before entry onto their property, unless the owner/occupant agrees to a shorter notice. Ideally, seven days' notice should be provided
- internal and external meetings must be supported by written agendas and minutes.

9.5 Internal training

D4C will be trained by Sydney Water's CEA at a kick off meeting for each project stage, if crews have not already been trained. Training will focus on addressing customer and communication issues, and the expected Sydney Water processes and procedures to be used. This will ensure there are consistent methods used across all Sydney Water projects.

During training, results from previous customer research surveys will be presented to ensure community expectations are clearly understood and met during the work.

The D4C construction supervisor will then train their crews and sub-contractors in expected procedures and customer and communication issues.

10 Roles and responsibilities

Team member	Roles and responsibilities
Sydney Water Engagement Lead - South	<ul style="list-style-type: none"> • Reviews and approves this CS. • Reviews and approves CSAPs and monitors and evaluates their implementation and delivery. • Attends specific external stakeholder meetings as required. • Responds to enquiries referred from the CEA or SW PM. • Monitors stakeholder engagement activities completed by D4C. • Assists with identifying opportunities for improvement in community engagement activities. • Reviews responses to Special Inquiries and Energy and Water Ombudsman of NSW (EWON) complaints. • Attends specific external stakeholder and resident meetings as required. • Revi community relations audits. • Organise customer surveys. • Ensure all relevant stakeholders have received timely communications. • Liaise with the Environmental Representative where required.
Sydney Water Project Manager (SW PM)	<ul style="list-style-type: none"> • Provide community engagement protocols to the D4C Construction Lead for the project team's reference on-site. • In consultation with Sydney Water Engagement Lead - South, monitor and manage performance of D4C in relation to community engagement/communications and adherence to protocols. • Attend stakeholder and resident meetings (as requested). • Organise internal meetings and ensure the Sydney Water project team and D4C are aware of their community engagement and communication responsibilities. • Ensure D4C follows stakeholder agreements and regulations at all times. • Prepare response to EWON complaints and Ministerials in consultation with CEA and Sydney Water Engagement Lead - South.
D4C's Community Engagement Advisor (CEA)	<ul style="list-style-type: none"> • Reviews and maintains this CS. • Develops CSAPs and monitors and evaluates their implementation and delivery. • Prepares and delivers letters and advertisements and other information materials for stakeholders and all affected residents in a timely manner, including council and Local MPs, in consultation with the project team, and obtain approvals as required. • Prepares communication materials and make sure these state all the accurate facts about the work. • Responds to enquiries referred from the project team. • Monitors stakeholder engagement activities completed by the project team. • Develops initial communication to residents in consultation with the project team. • Identifies opportunities for improvement in community engagement activities. • Provide input to the SW PM for responding to Special Inquiries and Energy and Water Ombudsman of NSW (EWON) complaints. • Attend specific external stakeholder and resident meetings as required. • Ensures the project team follows stakeholder agreements and regulations at all times. • Ensure WHIMS is up-to-date. • Prepares and delivers community engagement training. • Answer calls referred from Sydney Water's Customer Hub. • Organises community engagement audits. • Organises customer surveys and thank you letters, and provide feedback and analysis to Engagement Lead – South to consider for future engagement improvement opportunities. • Liaise with the Environmental Representative where required. Ensure Record of Contact forms or similar for customer issues are uploaded

Team member	Roles and responsibilities
	<p>into Consultation Manager and provide reports as required.</p> <ul style="list-style-type: none"> • Manage customer complaints in accordance with Sydney Water's Customer Complaints Policy and ensure that all complaints are entered into SAP CRM in line with Sydney Water procedures. • Order printed communication materials as required. • Conduct community engagement training at kick-off/toolbox meetings and/or at site inductions. • Use the D4C 1800 phone number to ensure all calls are responded to. • Respond to customer issues in conjunction with project team. • Meet with directly impacted landowners and develop pre-construction agreements, with Notice of Entries, in consultation with them to ensure they know what will happen on their property, when, and how their property will be restored when the work is finished. • Notify residents/stakeholders of any changes to planned activities. • Continually review communications for each site. • Attend onsite whenever there are issues that need to be resolved. • Maintain the Consultation Manager for the project. • Develop and maintain up to date project information on the Sydney Water Talk website. • Provide input into progress reports.
D4C's Construction Lead (CL)	<ul style="list-style-type: none"> • Resolve issues across multiple sites. • Ensure appropriate mitigation controls are put in place for night work. • Ensure all crew members have contractor photo identification. • Rectify any problems identified during community engagement audits. • Traffic Management Plans: coordinate all consultation and notify emergency services, determine any advertisement requirements, door knock/deliver notifications, identify impacted residents/stakeholders, prepare signage. • Ensure crews are aware of and implement the community engagement protocols and stakeholder agreements, including pre-construction agreements with landowners. • Liaise with residents on specific issues as needed. • Ensure communications provide all relevant information about upcoming works, and check details in communication items before material is delivered externally. • Respond to and/or refer enquiries/complaint details from residents to CEA. • Ensure project team document and record all resident contacts, such as complaints, and letters for future reference, and forwards to CEA to be uploaded into Consultation Manager. • Negotiate with SW PM and CEA before implementing changes to site activities that will affect directly impacted landowners and surround community. • Notify SW PM and CEA of incidents, issues, potential issues and complaints. • Keep photo records of the site at various stages of the project.
Environmental Representative	<ul style="list-style-type: none"> • Work with the SW PM and CEA to ensure environmental impacts are managed appropriately and details shared with the relevant stakeholders. • Work with the SW PM and CEA to ensure compliance with MCoA and Statements of Commitment for the project. • Review and report on communications as required to ensure environmental compliance. • Work with the SW PM and CEA to respond to the community concerning the environmental performance of the project.

11 Monitoring and evaluation

11.1 Monitoring and reporting

Ongoing monitoring of communications throughout the project will occur. This includes:

- monitoring of avoidable and unavoidable complaints
- monitoring of customer enquiries
- daily monitoring of media
- monthly reporting from D4C on progress, which can include CSAP performance
- audits of project team to ensure that protocols are being followed.

11.2 Final evaluation

A final evaluation of this strategy will be carried out at the conclusion of each stage of the project.

The purpose of the evaluation will be to determine the effectiveness of the process and strategies used during the design, planning and construction phases of the project.

The evaluation will examine:

- the number and nature of customer enquiries and complaints
- communication with stakeholders
- community engagement audit results
- if there were problems with communication how could this have been avoided
- media exposure.

This will be done through:

- analysis of media exposure
- surveys (internal and external)
- debriefs with the project team.

12 Compliance

The project has planning approval under part 3A of the Environment Planning and Assessment Act 1979. It will be implemented under two sets of condition of approval issued by the then Minister for Planning and Infrastructure on 14 June 2013:

- Concept Approval under Section 75O of the *Environmental Planning & Assessment Act 1979* – Application MP09_0189 (Concept MCoA)
- Project Approval under Section 75J of the *Environmental Planning & Assessment Act 1979* – Application MP09_0189 (Project MCoA)

On 6 January 2016, the Minister for Planning and Infrastructure granted a modification to the concept approval that enabled the boundary of the concept approval to be aligned with the boundary of the project approval area. The modification also had the effect of removing equivalent or duplicate Minister's Conditions of Approval (MCoA). Where these conditions were removed, they have been deleted in the Table 12.1 below.

As well as the requirements of the MCoA, Sydney Water has made commitments related to community and stakeholder engagement in its Statements of Commitment for the project. The tables below identifies where this CS address the requirements.

12.1 Minister's Conditions of Approval

Concept MCoA	Project MCoA	Details of Minister's Conditions of Conditions	Section of this Strategy
3.1	D1	Prior to the commencement of construction, a Community Communication Strategy shall be prepared and implemented to provide mechanisms to facilitate communication between the Proponent (and its contractor(s)), the Environmental Representative required by condition 3.9, the Relevant Council(s) and community stakeholders (particularly adjoining landowners) on the construction environmental management of the project. The Strategy shall be prepared to the satisfaction of the Director-General, and include, but not be limited to:	This Strategy
3.1 (a)	D1 (a)	(a) identification of stakeholders to be consulted as part of the Strategy, including affected and adjoining landowners;	Section 6
3.1 (b)	D1 (b)	(b) procedures and mechanisms for the regular distribution of information to community stakeholders on construction progress and matters associated with environmental management;	Sections 2, 4, 5, 9.4, 10
3.1 (c)	D1 (c)	(c) procedures and mechanisms through which the community stakeholders can discuss or provide feedback to the Proponent and/or Environmental Representative in relation to the environmental management and delivery of the project;	Sections 4, 5, 9.2, 9.3, 9.4
3.1 (d)	D1 (d)	(d) procedures and mechanisms through which the Proponent can respond to enquiries or feedback from the community stakeholders in relation to the environmental management and delivery of the project;	Sections 4, 5, 9.2, 9.3, 9.4, 9.5, 10
3.1 (e)	D1 (e)	(e) procedures and mechanisms that would be implemented to resolve issues/disputes that may arise between parties on the matters relating to environmental management and the delivery of the project. This may include the use of an appropriately qualified and experienced independent mediator	Sections 7, 9.1, 9.2, 9.3, 9.4, 9.5, 10
3.1 (f)	D1 (f)	(f) ongoing consultation throughout the life of the project.	Sections 2, 4, 5, 9.1, 9.2, 9.3, 9.4, 10
3.1	D1	Issues that shall be addressed through the Community Communication Strategy include (but are not necessarily limited to) finalisation of pipeline alignment	Sections 2, 4, 5, 7, 9.1, 9.2,

Concept MCoA	Project MCoA	Details of Minister's Conditions of Conditions	Section of this Strategy
		and associated infrastructure and the finalisation of measures to mitigate and/or minimise human amenity and environmental impacts, consistent with the management measures proposed in the documents referred to in condition 1 and the requirements of this approval.	
3.1	D1	The Proponent shall maintain and implement the strategy throughout construction of the Project. The Strategy shall be approved by the Director General prior to the commencement of construction, or as otherwise agreed by the Direct General.	Section 1
3.2	D2	Prior to the commencement of, or as otherwise agreed by the Director-General, the Proponent shall ensure that the following are available for community enquiries and complaints for the duration of construction:	Section 9.2
3.2 (a)	D2 (a)	(a) a 24-hour telephone number(s) on which complaints and enquires about construction may be registered;	Section 9.2
3.2 (b)	D2 (a)	(b) a postal address to which written complaints and enquires may be sent;	Section 9.2
3.2 (c)	D2 (c)	(c) an email address to which electronic complaints and enquires may be transmitted;	Section 9.2
3.2 (d)	D2 (d)	(d) a mediation system for complaints unable to be resolved.	Section 9.2
3.2	D2	The telephone number, postal address and email address shall be published in newspaper(s) circulating in the area of the project on at least one occasion prior to the commencement of construction; at six-monthly intervals during construction; and prior to the commencement of operation. This information shall also be provided on the website (or dedicated pages) required by this approval. At a minimum, the telephone number shall also be displayed on a sign near the entrance to each construction site, in a position that is clearly visible to the public.	Sections 5, 9.2
3.3	D3	The Proponent shall record details of all complaints. Information recorded shall include, but not necessarily be limited to:	Sections 9.2, 9.3
3.3 (a)	D3 (a)	(a) the date and time of the complaint;	Section 9.2
3.3 (b)	D3 (b)	(b) the means by which the complaint was made (telephone, mail or email);	Section 9.2
3.3 (c)	D3 (c)	(c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;	Section 9.2
3.3 (d)	D3 (d)	(d) the nature of the complaint;	Section 9.2
3.3 (e)	D3 (e)	(e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant;	Section 9.2
3.3 (f)	D3 (f)	(f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.	Section 9.2
3.3	D3	The record of complaints shall be made available to the Director-General for inspection upon request. Note: If the Proponent has a corporate system for managing complaints which would be adopted for the development and which substantially addresses the matters raised in condition 3.3, this may be submitted in fulfilment of this condition.	Section 9.3
3.4	D4	The Proponent shall provide an initial response to any complaint made relation to the project during construction or operation, within 48 hours of the complaint being made. The response and any subsequent action taken shall be recorded in	Sections 9.2, 9.3

Concept MCoA	Project MCoA	Details of Minister's Conditions of Conditions	Section of this Strategy
		accordance with condition 3.3. Any subsequent detailed response or action is to be provided within two weeks of the original complaint, or as otherwise agreed by the complainant.	
3.5	D5	Prior to the commencement of construction, or as otherwise agreed by the Director-General, the Proponent shall establish and maintain a new website, or dedicated pages within an existing website, for the provision of electronic information associated with the project, for the duration of construction and for 12 months following completion of the project. The Proponent shall, subject to confidentiality, publish and maintain up-to-date information on the website or dedicated pages including, but not necessarily limited to:	Section 5
3.5 (a)	D5 (a)	(a) information on the current implementation status of the project;	Section 5
3.5 (b)	D5 (b)	(b) a copy of, or a link to the Department website for, the documents referred to under condition 1.1/B2 of this Approval, and any documentation supporting modifications to this approval that may be granted from time to time;	Section 5
3.5 (c)	D5 (c)	(c) a copy of, or a link to the Department website for, this approval and any future modification to this approval;	Section 5
3.5 (d)	D5 (d)	(d) a description of the current environmental approval, licence or permit required and obtained in relation to the project;	Section 5
3.5 (e)	D5 (e)	(e) a list of each current strategy, plan, program or other document required under this approval;	Section 5
3.5 (f)	D5 (f)	(f) a description of the outcomes of compliance tracking in accordance with condition 3.6/B6 of this approval, including a list of the documents prepared under that condition;	Section 5
3.5 (g)	D5 (g)	(g) details of contact point(s) to which community complaints and enquiries may be directed, including a telephone number, a postal address and an email address.	Sections 5, 19.2

12.2 Statements of Commitment (SOC)

SOC	Details of Statement of Commitment	Section of this Strategy
26	During construction, communities will be informed prior to the start of any works in their area and will be notified at regular intervals throughout the construction process.	Sections 2, 4, 5, 9.1, 9.4,
29	Where there is a potential to impact on access to private property or pedestrian pathways, landowners, the local community and councils will be informed appropriately. Mitigation measures may include providing alternative access, reinstating access at the end of each day, and reinstating impacted areas to their original condition.	Sections 2, 5, 9.1
37	Relevant service providers will be consulted during detailed design to identify interactions and develop procedures to be implemented to minimise service interruptions. This will involve confirming any requirements or standards that will apply if it is determined that existing utilities or services need to be temporarily or permanently relocated. Inspections will be undertaken before construction starts in each location to confirm that there are no services in the area that were previously unknown.	Sections 2, 5, 6, 9.1, 9.4