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Tuesday, 7 December 2021

To whom it may concern,

**Ref: SSD 10375 Pitt Street North Over Station Development – Construction Framework Environmental Management Plan (CFEMP)**

This cover letter has been prepared on behalf of Pitt Street Developer North Pty Limited (the applicant), regarding the Pitt Street North Over Station Development at 252 Pitt Street, Sydney (Lot 20 DP1255509).

Please find attached the Construction Framework Environmental Management Plan (CFEMP) inclusive of the below sub-plans:

- Construction Noise and Vibration Management Sub-Plan (CNVMP);
- Air Quality Management Sub-Plan (AQMP);
- Construction Waste Management Sub-Plan

The document is submitted to the Planning Secretary as required under SSD 10375 condition of consent B44 (b), B47 (b), B48 (b), B50 and B51 (b).

The relevant applicable conditions are as follows:

Schedule	Condition
B44	<p>Prior to the issue of the relevant Construction Certificate, the Applicant shall:</p> <p>(a) amend, or prepare an addendum to, the Construction Environmental Management Plan (CEMP) applicable to the CSSI approval (CSSI 7400) to apply to the development. The amended CEMP must be submitted to the Planning Secretary and Certifying Authority, or</p> <p>(b) prepare a Construction Framework Environmental Management Plan (CFEMP) for the development, independent of the CEMP approved with the CSSI station works. A copy of the final CFEMP must be submitted to the Planning Secretary and Certifying Authority. The CFEMP must:</p> <p>(i) describe the relevant stages and phases of construction including work program outlining relevant timeframes for each stage/phase;</p> <p>(ii) describe all activities to be undertaken on the site during site establishment and construction of the development;</p> <p>(iii) clearly outline the stages/phases of construction that require ongoing environmental management monitoring and reporting;</p> <p>(iv) detail statutory and other obligations that the Applicant is required to fulfil during site establishment and construction, including approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;</p> <p>(v) include specific consideration of measures to address any requirements of the EPA during site establishment and construction;</p> <p>(vi) describe the roles and responsibilities for all relevant employees involved in the site establishment and construction of the works;</p>

	<p>(vii) detail how the environmental performance of the site preparation and construction works will be monitored, and what actions will be taken to address identified potential environmental impacts;</p> <p>(viii) document and incorporate all sub environmental management plans (Sub-Plans), studies and monitoring programs required under this consent; and</p> <p>(ix) include arrangements for community consultation and complaints handling procedures during construction.</p>
B47	<p>Prior to the issue of the relevant Construction Certificate, the Applicant shall:</p> <p>(a) amend, or prepare an addendum to, the Construction Noise and Vibration Management Sub-Plan (CNVMP) applicable to the CSSI approval (CSSI 7400) to apply to the development. The amended CNVMP must be submitted to the Planning Secretary and Certifying Authority, or</p> <p>(b) prepare and implement a Construction Noise and Vibration Management Sub-Plan (CNVMP) for the development, independent of the CNVMP approved with the CSSI station works. A copy of the CNVMP must be submitted to the Planning Secretary and Certifying Authority. The Sub-Plan must include:</p> <p>(i) identification of the specific activities that will be carried out and associated noise sources at the premises;</p> <p>(ii) identification of all potentially affected sensitive residential receiver locations;</p> <p>(iii) quantification of the rating background noise level (RBL) for sensitive receivers, as part of the Sub-Plan, or as undertaken in the EIS;</p> <p>(iv) the construction noise, ground-borne noise and vibration objectives derived from an application of the EPA Interim Construction Noise Guideline (ICNG), as reflected in conditions of approval;</p> <p>(v) prediction and assessment of potential noise, ground-borne noise (as relevant) and vibration levels from the proposed construction methods expected at sensitive receiver premises against the objectives identified in the ICNG and conditions of approval;</p> <p>(vi) where objectives are predicted to be exceeded, an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise and vibration impacts;</p> <p>(vii) description of management methods and procedures, and specific noise mitigation treatments/measures that can be implemented to control noise and vibration during construction;</p> <p>(viii) where objectives cannot be met, additional measures including, but not necessarily limited to, the following should be considered and implemented where practicable; reduce hours of construction, the provision of respite from noise/vibration intensive activities, acoustic barriers/enclosures, alternative excavation methods or other negotiated outcomes with the affected community;</p> <p>(ix) where night-time noise management levels cannot be satisfied, a report shall be submitted to the Planning Secretary outlining the mitigation measures applied, the noise levels achieved and justification that the outcome is consistent with best practice;</p>

	<p>(x) measures to identify non-conformances with the requirements of the Sub-Plan, and procedures to implement corrective and preventative action;</p> <p>(xi) suitable contractual arrangements to ensure that all site personnel, including sub-contractors, are required to adhere to the noise management provisions in the Sub-Plan;</p> <p>(xii) procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity;</p> <p>(xiii) measures to monitor noise performance and respond to complaints;</p> <p>(xiv) measures to reduce noise related impacts associated with offsite vehicle movements on nearby access and egress routes from the site;</p> <p>(xv) procedures to allow for regular professional acoustic input to construction activities and planning; and</p> <p>(xvi) effective site induction, and ongoing training and awareness measures for personnel (e.g. toolbox talks, meetings etc).</p>
B48	<p>Prior to the issue of the relevant Construction Certificate, the Applicant shall:</p> <p>(a) amend, or prepare an addendum to, the Air Quality Management Sub-Plan (AQMP) applicable to the CSSI station works (CSSI 7400) to apply to the development. The amended CNVMP must be submitted to the Planning Secretary and Certifying Authority, or</p> <p>(b) prepare an Air Quality Management Sub-Plan (AQMP) for the development, independent of the AQMP approved with the CSSI station works. A copy of the AQMP must be submitted to the Planning Secretary and Certifying Authority. The Sub-Plan must include, as a minimum, the following elements:</p> <p>(i) be prepared by a suitably qualified and experienced expert in accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (the Approved Methods);</p> <p>(ii) relevant environmental criteria to be used in the day-to-day management of dust and volatile organic compounds (VOC/odour);</p> <p>(iii) mission statement;</p> <p>(iv) dust and VOCs/odour management strategies consisting of:</p> <ul style="list-style-type: none"> <li>• objectives and targets;</li> <li>• risk assessment;</li> <li>• suppression improvement plan.</li> </ul> <p>(v) monitoring requirements including assigning responsibility (for all employees and contractors);</p> <p>(vi) communication strategy; and</p> <p>(vii) system and performance review for continuous improvements.</p>
B49	<p>The Sub-Plan must detail management practices to be implemented for all dust and VOC/odour sources at the site. The Sub-Plan must also detail the dust, odour, VOC and semi-volatile organic compounds (SVOC) monitoring program (e.g. frequency, duration and method of monitoring) to be undertaken for the project.</p>
B50	<p>The Applicant must also develop and implement an appropriate comprehensive Reactive Air Quality and Odour Management Plan which will incorporate an Ambient Air Monitoring Program and Reactive Management Strategy to ensure that the assessment criteria are met during the works.</p>

B51	<p>Prior to the issue of the relevant Construction Certificate, the Applicant shall:</p> <p>(a) amend, or prepare an addendum to, the Construction Waste Management Sub-Plan (CWMP) applicable to the CSSI station works (CSSI 7400) to apply to the development. The amended CWMP must be submitted to the Planning Secretary and Certifying Authority, or</p> <p>(b) prepare a Construction Waste Management Sub-Plan (CWMP) for the development, independent of the CWMP approved with the CSSI Station works. A copy of the CWMP must be submitted to the Planning Secretary and Certifying Authority. The Sub-Plan must include, as a minimum, the following elements:</p> <p>(i) require that all waste generated during the project is assessed, classified and managed in accordance with the EPA's "Waste Classification Guidelines Part 1: Classifying Waste";</p> <p>(ii) demonstrate that an appropriate area will be provided for the storage of bins and recycling containers and all waste and recyclable material generated by the works;</p> <p>(iii) procedures for minimising the movement of waste material around the site and double handling;</p> <p>(iv) waste (including litter, debris or other matter) is not caused or permitted to enter the waters of Sydney Harbour;</p> <p>(v) any vehicle used to transport waste or excavation spoil from the site is covered before leaving the premises;</p> <p>(vi) the wheels of any vehicle, trailer or mobilised plant leaving the site and cleaned of debris prior to leaving the premises;</p> <p>(vii) details in relation to the transport of waste material around the site (on-site) and from the site, including (at a minimum):</p> <ul style="list-style-type: none"> <li>• a traffic plan showing transport routes within the site;</li> <li>• a commitment to retain waste transport details for the life of the project to demonstrate compliance with the Protection of the Environment Operations Act 1997; and</li> <li>• the name and address of each licensed facility that will receive waste from the site (if appropriate).</li> </ul>
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We request written confirmation the Planning Secretary has received the required evidence as required by SSD 10375 condition of consent B44 (b), B47 (b), B48 (b), B49, B50 and B51 (b).

Should you require any additional information, please do not hesitate to contact the undersigned.

Yours sincerely,



Stefan De Jesus  
 Development Manager  
 On behalf of Pitt Street Developer North Pty Ltd

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## **Attachment A**

### Construction Framework Environmental Management Plan (CFEMP)