

01 April 2022

Michael Cassel
Planning Secretary
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Shiraz Ahmed

Dear Mr Ahmed

RE: New Primary School in Mulgoa Rise, Glenmore Park (SSD 11070211): Construction Environmental Management Plan in accordance with Condition B14.

I refer to the New Primary School in Mulgoa Rise, Glenmore Park approved on 18 March 2022.

In accordance with the requirements of Condition B14, attached to this letter we provide the Construction Environmental Management Plan for your information. Issued prior to the commencement of construction.

Should you wish to discuss the above further please do not hesitate to contact the undersigned.

Yours sincerely,



Justin Barrett
Senior Project Director
Schools Infrastructure NSW



**GWSC – NEW PUBLIC SCHOOL IN MULGOA RISE
[SSD-11070211]**

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

23 March 2022



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GLOSSARY

Term	Definition
Approved disturbance area	The area identified as such on the development layout
CEMP	Construction Environmental Management Plan
Conditions of consent	Conditions contained in Schedule 2 of the Development Consent for SSD 0157/20
Department	NSW Department of Planning, Industry and Environment.
EIA	Environmental impact assessment. This includes the approved documents prepared to support an application for consent or approval of a project, and any subsequent modifications to the application or proposed project, including (as relevant) further environmental impact assessments and responses to submissions.
EIS	Environmental impact statement prepared by the proponent for a state significant project application.
Environmental aspect	As defined by AS/NZS ISO 14001:2015 as an element of an organisation's activities, products or services that can interact with the environment. They can be direct or indirect.
Environmental control map or plan	A plan or map that identifies the location of physical protection measures, work method controls and monitoring requirements to minimise the impact of project activities on the environment and community in and adjoining a specific work area.
Incident	An occurrence or set of circumstances that causes, or threatens to cause, material harm and which may or may not be or cause a non-compliance.
Material harm	Harm that: - involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial - Results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
Minister	NSW Minister for Planning and Public Spaces (or delegate or nominee, including the Secretary of the Department of Planning, Industry and Environment)
Mitigation	Actions or measures to reduce the impacts of a project.
Non-conformance	Failure to comply with an environmental requirement, standard, or procedure.
Non-compliance	An occurrence and/or set of circumstances that breach the conditions of consent and/or any other legal requirement.
Phase	A distinct period in the project (for example construction, operation, decommissioning).
Project (or 'The Project')	The construction process required to complete the works described in the SSD 0157/20 Conditions of Consent.
Proponent	The person or entity that is referred to as the proponent in an approval or the applicant in a consent or any other person carrying out any part of the development to which the approval or consent applies.
Planning Secretary	Planning Secretary under the Environmental Planning and Assessment Act 1979, or nominee. (Note references to the Planning Secretary in legislation now refer to the 'Secretary of the Department of Planning, Industry and Environment')

PMP	Project Management Plan - RCC internal project management document
RCC	Richard Crookes Constructions Pty Ltd
Stage	A discrete sequence of activities undertaken to complete one or many activities within the project scope. A project can have several stages which can extend throughout multiple phases.
SSD	State Significant Development

REVISION REGISTER

REVISION DATE	REVISION DESCRIPTION	PREPARED BY	APPROVED BY
19/11/2021	Revision 1 - MWO Submission	JH (RCC - Site Engineer)	
22/01/2022	Revision 2 - For construction (Draft)	JH (RCC - Site Engineer)	

Project Stage - This CEMP in its current form is for information purposes only. RCC are not in receipt of the project specific SSDA Conditions of Consent for MRPS. Staged construction is not proposed; therefore this CEMP relates to all construction works.

Project Phase - This EMP relates specifically to the Construction phase of the SSD-11070211 - New Public School in Mulgoa Rise.

CEMP CONDITION COMPLIANCE TABLE

Each Sub-Plan has an included Condition Compliance Table, with specific section and page number references. The below table is high level, and directs to each appendix/sub-plan.

Condition	Condition Requirements	Document/Sub-Plan Reference
B14	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:	
	(a) Details of:	Section 2.4
	(i) hours of work;	
	(ii) 24-hour contact details of site manager;	
	(iii) management of dust and odour to protect the amenity of the neighbourhood;	Appendix 6.11
	(iv) groundwater management plan including measures to prevent groundwater contamination;	
	(v) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	Appendix 6.12
	(vi) community consultation and complaints handling as set out in the Community Communication Strategy required by condition B10;	Section 3 & Appendix 6.14
	(b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;	Appendix 6.6
	(c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	Appendix 6.7
	(d) Construction Traffic and Pedestrian Management Sub-Plan (see condition B15);	Appendix 6.8
	(e) Construction Noise and Vibration Management Sub-Plan (see condition B16);	Appendix 6.9
B15	(f) Construction Waste Management Sub-Plan (see condition B17);	Appendix 6.10
	(g) Construction Soil and Water Management Sub-Plan (see condition B18)	Appendix 6.11
	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:	Appendix 6.8

Condition	Condition Requirements	Document/Sub-Plan Reference
	(a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and TfNSW; (c) detail: (i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; (ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs; (iii) heavy vehicle routes, access and parking arrangements; (iv) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; (v) construction vehicle volumes during stages of works and measures to reduce parking impacts on local streets; and (vi) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s).	
B16	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced noise expert; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in condition B16(d); (f) include a complaints management system that would be implemented for the duration of the construction; and (g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B13.	Appendix 6.9
B17	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following:	Appendix 6.10

Condition	Condition Requirements	Document/Sub-Plan Reference
	(a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain; (b) information regarding the recycling and disposal locations; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.	
B18	The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; (c) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'; (d) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (e) detail all off-site flows from the site; and (f) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI.	Appendix 6.11

1. INTRODUCTION

1.1. PURPOSE AND SCOPE

This Construction Environmental Management Plan (CEMP) has been prepared by Richard Crookes Constructions Pty Ltd for the New Primary School in Mulgoa Rise (MRPS).

This CEMP and its sub-plans will be developed in accordance with the SSD-11070211 Conditions of Consent, Richard Crookes Constructions' environmental management systems, the relevant project approval documentation and the Environmental Management Plan Guideline: Guideline for Infrastructure Projects DPIE April 2020).

The purpose of this Construction Environmental Management Plan is to:

- Identify the environmental issues (aspects and impacts) for this project;
- Maintain Compliance with the SSDA;
- Establish, communicate & implement environmental operational controls to reduce any adverse impacts on the environment from RCC's activities, products and services.
- Implement and Monitor compliance by RCC and its suppliers & subcontractors with the requirements of all relevant environmental legislation, conditions of any applicable licence, approval and permit, regulatory requirements and this EMP.
- Action any outcomes from incidents or accidents, project audits or other identified non-conformances to continually improve the RCC environmental management system.

1.2. OBJECTIVES

The principal objectives of the CEMP are:

- Ensure that the construction works are carried out in accordance with the appropriate environmental statutory requirements
- Ensure that the works are carried out in such a way as to minimise potential environmental degradation by the implementation of environmental best practice
- Ensure that personnel engaged in the work comply with the CEMP
- Respond to changes in environmental conditions during the proposed works through review, monitoring and control programs
- Ensure corrective actions are implemented in a timely manner

This CEMP is the overarching document for environmental management of the Project, with a number of supporting management documents. It is applicable to all personnel associated with the completion of the Project works, including Project Managers, Contractors and Sub-Contractors.

1.3. ENVIRONMENTAL POLICY

Richard Crookes Constructions Pty Ltd implements an Environmental Management System that is certified by Global mark as meeting the requirements of AS/NSW ISO 14001:2016 Environmental Management Systems. RCC's Environmental Policy can be found in Appendix 6.4 of this CEMP. It is provided as an Appendix so that it may be updated in isolation as required.

This CEMP is not staged, as it applies to the entire construction phase of the Project.

2. PROJECT DESCRIPTION

2.1. PROJECT OVERVIEW

This Construction Environmental Management Plan (CEMP) has been prepared to accompany a State Significant Development Application (SSDA) for the new development of a New Primary School in Mulgoa Rise, located at Deerubbin Dr, Glenmore Park. The site comprises a rectangular lot with an area of approximately three hectares.

The works are design and construction of a new primary school which offers:

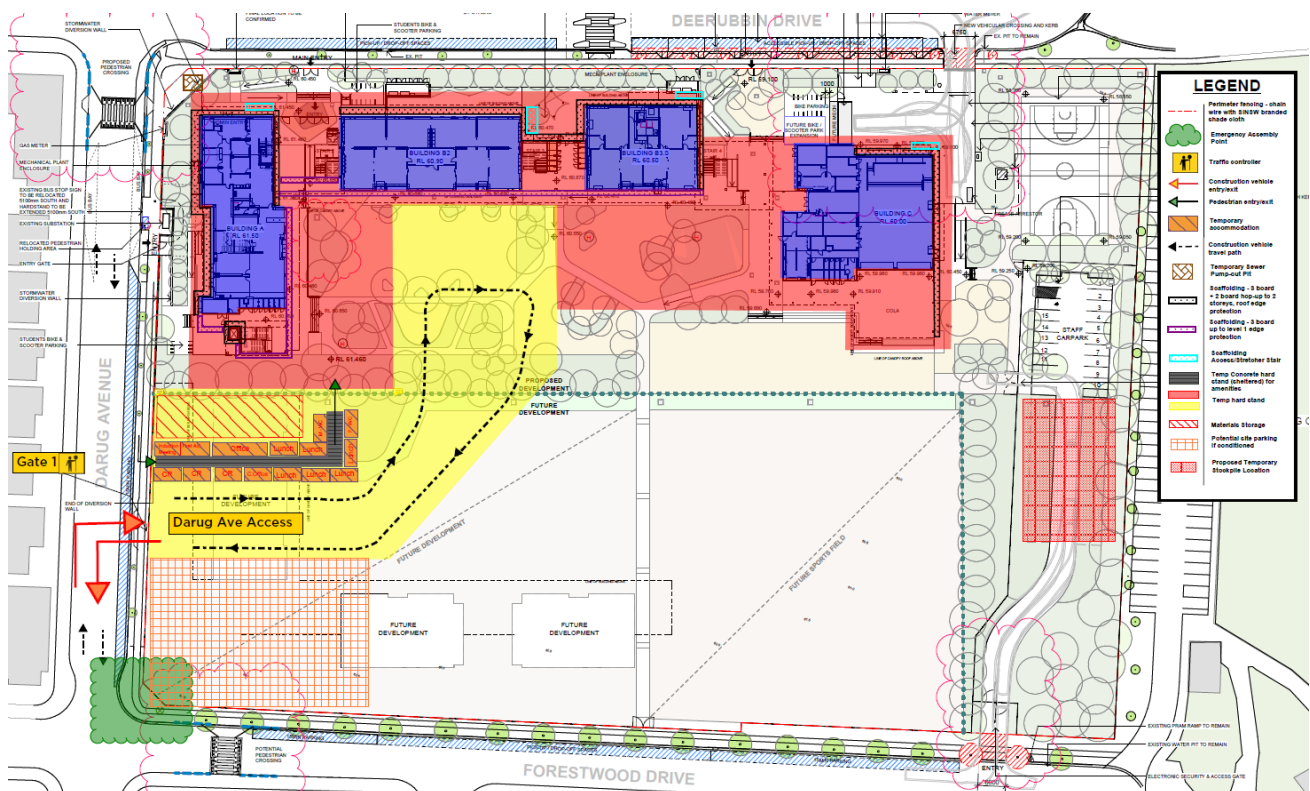
- Extensive school grounds and additional landscaping suitable for 414 (Core 35) students in stage one, and potentially 1000 when stage 2 is built
- New Teaching Facilities including 44 new learning spaces
- Additional four Support Space for learning
- Additional Administration floor space
- More Aesthetically pleasing & functional landscapes, gardens & playground equipment
- Canteen facilities
- Special programmes space
- OSHC support facilities

2.2. SITE LOCATION PLAN

- Site Context – Site Location and Plan



- Site Context – Construction setup



2.3. SCOPE OF WORKS

Scope of Works

This CEMP will apply to all construction activities relating to the project, including:

- Site establishment and installation of fencing and gates;
- Installation of scaffolding and hoarding
- Earthworks and site remediation
- Construct new school buildings and learning spaces
- Construct car park and sports court areas
- Install services and internal finishes
- Finalise external and internal works and landscape

indicative plant and equipment

- *Excavators*
- *Rollers*
- *Mobile Cranes*
- *Piling machines*
- *Trucks (deliveries, haulage etc.)*
- *Concrete trucks*
- *Concrete pumps*
- *Generators*

The above list is indicative only. All plant and equipment required to complete the Project works will be used.

2.4. TIMING OF ACTIVITIES

Hours of Work

Construction activities will be carried out in accordance with the following approved work hours in accordance with SSDA consent conditions C3 to C7:

C3. Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:

- (a) between 7am and 6pm, Mondays to Fridays inclusive; and
- (b) between 8am and 1pm, Saturdays.

No work may be carried out on Sundays or public holidays.

C4. Notwithstanding condition C3, provided noise levels do not exceed the existing background noise level plus 5dB(A), works may also be undertaken during the following hours:

- (a) between 6pm and 7pm, Mondays to Fridays inclusive; and
- (b) between 1pm and 4pm, Saturdays.

C5. Construction activities may be undertaken outside of the hours in condition C3 and C4 if required:

- (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or
- (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or
- (c) where the works are inaudible at the nearest sensitive receivers; or

(d) where a variation is approved in advance in writing by the Planning Secretary or its nominee if appropriate justification is provided for the works.

Note: Variation requests must be provided to the Planning Secretary seven (7) days prior to the proposed works.

C6. Notification of such construction activities as referenced in condition C5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.

C7. Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:

- (a) 9am to 12pm, Monday to Friday;
- (b) 2pm to 5pm Monday to Friday; and
- (c) 9am to 12pm, Saturday.

24 Hour Contact Details

Name	Title	Phone Number
Sam Noyes	Project Manager	0466 557 620

3. COMMUNITY AND STAKEHOLDER ENGAGEMENT

A Community Communication Strategy will be prepared by SINSW as required by and in accordance with SSD Condition B10

This will be submitted to the Planning Secretary and will be made available on the School Infrastructure NSW website as required.

All information pertaining to community and stakeholder engagement for the SSD 11070211 works can be found in this strategy. Refer to Appendix 6.14.

4. ENVIRONMENTAL MANAGEMENT FRAMEWORK

4.1. RELATIONSHIP TO AN EXISTING ENVIRONMENTAL MANAGEMENT SYSTEM

This CEMP is a supplementary document to RCC's Environmental Management System that is certified by Global mark as meeting the requirements of AS/NSW ISO 14001:2016 Environmental Management Systems.

RCC's Environmental Management Plan itself is included within RCC's Project Management Plan (PMP).

Some information has been copied into this CEMP for clarity, any reference in this CEMP to the PMP, QAP's or various forms is a reference to RCC's internal management system.

4.2. ENVIRONMENTAL MANAGEMENT STRUCTURE AND RESPONSIBILITIES

	Site Responsibility/Management															RCC Business Systems Management									
Project Environmental Roles & Responsibilities Insert More Roles/Responsibilities as the Project develops	Project Manager	Site Manager	Engineer	Contract Manager/Administrator	Design Manager	Cadet	Foreman	QA Officer /Finishes Foreman	WHS & Env Coordinator	Leading Hand	Construction worker	Subcontractors				Construction Director//Manager	Business Systems QA.ENV Manager	Human Resources Manager	WHS Manager	Rehabilitation Coordinator	Commercial Manager	External Auditors			
ENVIRONMENTAL MANAGEMENT																									
Identification of project environmental risks (aspects & impacts) and development of the EMP to document controls		•							•																
Planning & conducting training incl. inductions																	•	•	•						
Inspections, monitoring & testing		•							•								•		•						
Compliance with the EMP, corrective & preventative action		•							•								•					•			
Verification of compliance (audits) and review of system effectiveness (i.e. is it working as planned?)	•	•							•								•					•			
Incident management & emergency response		•							•								•		•						
Environmental Policy, objectives & targets		•							•							•	•								
Allocation of resources for Environmental management		•							•							•									
Compliance with legal & other requirements		•							•							•	•								
Keeping abreast of changes in legal & other requirements	•	•							•								•								
Acquire & disseminate environmental management information		•							•								•								
Develop & implement procedures		•							•								•								
Assessing suppliers/subcontractors' abilities to comply with the EMS		•							•								•								
Ensuring compliance with RCC procedures and site rules		•							•			•					•								
Monitoring or technological changes & management practices		•							•							•	•								
Liaise with regulatory authorities (Local Council, Heritage Office, DECCW etc.)	•	•							•								•								
Management of community complaints	•	•							•							•									

4.3. LEGAL AND COMPLIANCE REQUIREMENTS

Legislation	Objectives & Application	Relevance
Federal		
Environment Protection and Biodiversity Conservation Act 1999	The Environment Protection and Biodiversity Conservation Act (EPBC) 1999 aims to: • Provide for the protection of the environment, especially matters of national environmental significance • Conserve Australia's biodiversity • Protect biodiversity internationally by controlling the international movement of wildlife • Provide a streamlined environmental assessment and approvals process where matters of national environmental significance are involved • Protect our world and national heritage • Promote ecologically sustainable development.	The Project has a consent requirement to purchase biodiversity offset credits
Aboriginal and Torres Strait Islander Heritage Protection Act 1984	The purposes of this Act are the preservation and protection from injury or desecration of areas and objects in Australia and in Australian waters, being areas and objects that are of particular significance to Aboriginals in accordance with Aboriginal tradition.	This Act is applicable to the Project in the event of an Unexpected Find of an Aboriginal object.
National Environmental Protection Council Act 1994	The object of this Act is to ensure that, by means of the establishment and operation of the National Environment Protection Council: • People enjoy the benefit of equivalent protection from air, water, or soil pollution and from noise, wherever they live in Australia; and • Decisions of the business community are not distorted, and markets are not fragmented, by variations between participating jurisdictions in relation to the adoption or implementation of major environment protection measures.	The Council may make national environment protection measures that will influence the completion of the Project. See Act for further detail.

Legislation	Objectives & Application	Relevance
Federal		
National environmental Protection measures (Implementation) Act 1998	The objects of this Act are: - to make provision for the implementation of national environment protection measures in respect of certain activities carried on by or on behalf of the Commonwealth and Commonwealth authorities; and - to protect, restore and enhance the quality of the environment in Australia, having regard to the need to maintain ecologically sustainable development; and - to ensure that the community has access to relevant and meaningful information about pollution.	Under this Act, the Environment Minister may (subject to considerations of national interest or administrative efficiency): - Apply State laws to the activities of the Commonwealth or Commonwealth authorities in Commonwealth places - Apply State or Territory laws to the activities of the Commonwealth or Commonwealth authorities in other places.
NTC Brochure: Load Restraint Guide 2004	The Load Restraint Guide 2018 provides truck drivers, operators, and everyone in the transport chain of responsibility with basic safety principles for the safe carriage of loads.	All drivers (where relevant) must follow this guide when transporting goods to and from the Project.

Legislation	Objectives & Application	Relevance
State		
Waste Avoidance and Resource Recovery Act 2001	The objects of this Act are as follows: - To encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of - ecologically sustainable development, - To ensure that resource management options are considered against a hierarchy of the following order: (i) Avoidance of unnecessary resource consumption, (ii) Resource recovery (including reuse, reprocessing, recycling and energy recovery), (iii) Disposal, - To provide for the continual reduction in waste generation, - To minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste, - To ensure that industry shares with the community the responsibility for reducing and dealing with waste, - To ensure the efficient funding of waste and resource management planning, programs and service delivery, - To achieve integrated waste and resource management planning, programs and service delivery on a State-wide basis, - To assist in the achievement of the objectives of the Protection of the Environment Operations Act 1997.	Waste Avoidance and Resource Recovery Act 2001 Establishes the waste hierarchy. Promotes waste avoidance and resource recovery by developing waste avoidance and resource recovery strategies. Provides requirements for waste avoidance and resource recovery

Legislation	Objectives & Application	Relevance
State		
State Environmental Planning Policy No 55 - Remediation of Land	The object of this Policy is; - To provide for a State-wide planning approach to the remediation of contaminated land. In particular, this Policy aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment: - By specifying when consent is required, and when it is not required, for a remediation work, and - By specifying certain considerations that are relevant in rezoning land and in determining development applications in general and development applications for consent to carry out a remediation work in particular, and - By requiring that a remediation work meet certain standards and notification requirements.	The site is to be remediated in accordance with State Environmental Planning Policy 55 – Remediation of Land (SEPP 55).

Legislation	Objectives & Application	Relevance
State		
Protection of the Environmental Operations Act 1997	An Act to protect, restore and enhance the environment in NSW and to promote public access to information and involvement in environment protection. The Act: - Designates the EPA (Environment Protection Authority) as the regulatory authority. See epa.nsw.gov.au for further information. Objectives of the Act are: • To protect, restore and enhance the quality of the environment in New South Wales, having regard to the need to maintain ecologically sustainable development, • To provide increased opportunities for public involvement and participation in environment protection, • To ensure that the community has access to relevant and meaningful information about pollution, • To reduce risks to human health and prevent the degradation of the environment by the use of mechanisms that promote the following: • Pollution prevention and cleaner production, • The reduction to harmless levels of the discharge of substances likely to cause harm to the environment, • The elimination of harmful wastes, • The reduction in the use of materials and the re-use, recovery or recycling of materials, • The making of progressive environmental improvements, including the reduction of pollution at source, • The monitoring and reporting of environmental quality on a regular basis, • To rationalise, simplify and strengthen the regulatory framework for environment protection, • To improve the efficiency of administration of the environment protection legislation, • To assist in the achievement of the objectives of the Waste Avoidance and Resource Recovery Act 2001.	There is a duty to report pollution incidents under section 148 of the Protection of the Environment Operations Act 1997 (POEO Act). Schedule 1 of the POEO defines activities that require an Environmental Protection Licence. The POEO Act Classifies Environmental Offences and Penalties.

Legislation	Objectives & Application	Relevance
State		
Protection of the Environment Operations (Noise Control) Regulation 2017	The object of this Regulation is to repeal and remake, with minor amendments, the provisions of the Protection of the Environment Operations (Noise Control) Regulation 2000. This Regulation creates offences (maximum penalty \$11,000 for corporations and \$5,500 for individuals) for selling or driving a vehicle with a temporary noise reduction device or with temporary noise reduction packing or for modifying or repairing a vehicle so as to include any such device or packing. A person is not guilty of any such offence if the conduct alleged to give rise to the offence occurs within 6 months after the commencement of this Regulation. This Regulation also makes provision with respect to the following: a) the selling or using of certain classes of motor vehicles and motor vehicle accessories that are capable of emitting noise levels above a prescribed level, b) the use of motor vehicle horns and motor vehicle intruder alarms, c) the times during which it is not permissible to use certain motor vehicles if they emit noise that can be heard in other residential premises, d) the sounding of sirens and similar devices and the use of sound systems on vessels, e) the emission of noise from the engines or exhausts of motor vehicles and vessels, f) the maintenance of noise control equipment on motor vehicles and vessels, g) the issue of defective vehicle notices and defective vessel notices, h) the prohibition on selling certain articles that are capable of emitting noise levels above a prescribed level, i) the obligation to label certain articles, j) the times during which it is not permissible to use certain articles (including musical instruments) if they emit noise that can be heard in any residential premises, k) the inspection and testing procedures for the purpose of determining noise emission levels of certain motor vehicles, motor vehicle accessories, vessels, articles or equipment. See epa.nsw.gov.au for further information.	Equipment used during the Project construction works must be in compliance with this regulation.

Legislation	Objectives & Application	Relevance
State		
Protection of the Environment Operations (Waste) Regulation 2014	The Waste Regulation improves the EPA's ability to protect human health and the environment, and paves the way for a modern and fair waste industry in NSW. See epa.nsw.gov.au for further information.	Construction waste must be managed in accordance with this regulation.
Protection of the Environment Operations (Clean air) Regulations 2010	This Regulation: • Provides for the certification of domestic solid fuel heaters; • Controls burning generally by imposing an obligation to prevent or minimise emissions, by prohibiting the burning of certain articles and requiring approval for certain fires/incinerators; • Requires the fitting of anti-pollution devices to certain motor vehicles and prescribes an offence of emitting excessive air impurities; • Imposes certain requirements and standards on the supply of petrol; • Prescribes standards for certain groups of plant and premises to regulate industry's air impurity emissions; and • Imposes requirements on the control, storage and transport of volatile organic liquids. See epa.nsw.gov.au for further information.	The construction works associated with the project must be conducted in such a way that does not contravene this regulation. Regulates atmospheric pollutants including dust and odour onsite

Legislation	Objectives & Application	Relevance
State		
Crown Lands Act 2016	For the purposes of this Act, the principles of Crown land management are— (a) that environmental protection principles be observed in relation to the management and administration of Crown land; (b) that the natural resources of Crown land (including water, soil, flora, fauna and scenic quality) be conserved wherever possible; (c) that public use and enjoyment of appropriate Crown land be encouraged; (d) that, where appropriate, multiple use of Crown land be encouraged; (e) that, where appropriate, Crown land should be used and managed in such a way that both the land and its resources are sustained in perpetuity; and (f) that Crown land be occupied, used, sold, leased, licensed or otherwise dealt with in the best interests of the State consistent with the above principles.	The Project site is Crown Land, which influences the management of works, certification, and applicability of legislation.
Fire Brigades Act 1989	This Act applies to; - Land-based hazardous material incidents (and to any fires that may result from them) that occur anywhere in the State except on State waters, as defined in the Marine Pollution Act 2012. - A hazardous material incident that occurs in or on a building, bridge or other structure or on any body of water (not being part of State waters) is taken to be land-based.	Applies to emergency incidents and accidents involving hazardous materials
Local Government Act 1993	The purposes of this Act are as follows: - To provide the legal framework for an effective, efficient, environmentally responsible and open system of local government in New South Wales, - To regulate the relationships between the people and bodies comprising the system of local government in New South Wales, - To encourage and assist the effective participation of local communities in the affairs of local government,	Referenced and assessed during Approval Process

Legislation	Objectives & Application	Relevance
State		
Contaminated Land Management Act 1997	Objects of this Act: - The general object of this Act is to establish a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation under Division 2 of Part 3. - Particular objects of this Act are: - To set out accountabilities for managing contamination if the EPA considers the contamination is significant enough to require regulation under Division 2 of Part 3, and - To set out the role of the EPA in the assessment of contamination and the supervision of the investigation and management of contaminated sites, and - To provide for the accreditation of site auditors of contaminated land to ensure appropriate standards of auditing in the management of contaminated land, and - To ensure that contaminated land is managed with regard to the principles of ecologically sustainable development	Contamination on site must be assessed and managed in accordance with this act

Legislation	Objectives & Application	Relevance
State		
Environmental Planning and Assessment Act 1979	The objectives of this Act are to encourage: • The proper management, development, and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment, • The promotion and co-ordination of the orderly and economic use and development of land, • The protection, provision and co-ordination of communication and utility services, • The provision of land for public purposes, • The provision and co-ordination of community services and facilities, and • The protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and • Ecologically sustainable development, and • The provision and maintenance of affordable housing, and to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and • To provide increased opportunity for public involvement and participation in environmental planning and assessment.	Planning approval for the project is regulated by the DPE under the Environmental Planning and Assessment Act 1979.

4.4. TRAINING AND AWARENESS

Project specific environmental training and awareness will be conducted/enforced throughout the duration of construction. The key avenues for the implementation of this training and awareness are **Site Inductions**, **Toolbox Talks**, **Pre-Start Meetings** and **General Awareness** measures.

Additional training may be conducted on an as-required basis as the works progress.

Site Inductions

All workers will complete a Project specific induction prior to accessing site/commencing works. In addition to the compulsory WHS information, this induction will provide all construction personnel with site specific environmental training. The training will include environmental concerns, management measures and other protocols in place to satisfy the Conditions of Consent and other environmental obligations.

Toolbox Talks

Tool box talks will be conducted regularly by RCC and sub-contractors, to address specific WHS and environmental concerns. These toolbox talks will address specific activities, the hazards associated with them, and the management measures required to be put in place to maintain compliance and minimise/eliminate environmental harm.

Examples of specific environmental issues that will be addressed in tool box talks include:

- Erosion and sediment control
- Hours of work
- Emergency and spill response
- Noise
- Housekeeping and waste
- Dust control
- Construction traffic management

Tool box talk attendance is mandatory and all those in attendance will be required to sign in to the discussion and outcomes on an attendance form. RCC will maintain records of all Toolbox talks.

Pre-Start Meetings

Pre-start meetings are a daily training and awareness protocol that will be implemented to inform the daily activities of the construction workforce.

The upcoming construction activities will be reviewed daily, and prior to the day commencing, the pre-start meeting will review and inform the required WHS practices, environmental management measures, work area hazards and other task specific concerns.

The pre-start meeting will be conducted by an RCC representative responsible for the work area that is being discussed. Sub-contractors will be encouraged to share and discuss WHS and environmental concerns in relation to their specific works for that day.

Attendance is mandatory and all in attendance will be required to sign in to the discussion and outcomes on an attendance form. RCC will maintain records of all pre-start topics, dates and attendees.

General Awareness Training

General awareness of environmental obligations, risks and management measures will be enforced through site notice boards, posters, environmental bulletins and sub-contractor engagement (i.e. contractual) information packages.

4.5. ENVIRONMENTAL RISK MATRIX/ASSESSMENT

A copy of the Environmental Risk Matrix/Assessment has been included as an appendix to this CEMP. This is a live document that will be continuously revised as the Project progresses.

It will be supplementary to a monthly High Risk Project Assessment, that will be completed and provided to all construction workers.

4.6. HOLD POINTS

Other than the specific requirements of the SSD-11070211 Conditions of Consent, there are no additional hold points applicable to the construction works of the Project.

The key hold points from the consent are:

- Unexpected Finds Procedure for contamination.
- Unexpected Finds procedure for Aboriginal Heritage.
- Unexpected Finds procedure for Non-Aboriginal Heritage.

Specific unexpected finds protocols for these hold points have been completed and are supplied with this CEMP as required by the Conditions of Consent.

4.7. ENVIRONMENTAL MANAGEMENT MEASURES, INSPECTIONS AND MONITORING

The following table outlines the environmental management measures, inspection and monitoring process that will be followed as part of RCC's existing Environmental Management System.

This is a live document that will be continuously updated as required throughout the duration of construction works.

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
1	Dust Generation Particulate Emissions (General)	- Install shade cloth on perimeter fencing - Vehicle corridors will be clearly identified and restricted to control vehicle access onsite. - Limit vehicle speed onsite to 20km/hr - Fixed and mobile (water tanker) water sprays - Reduce work activities /stop work during moderate to high wind velocity periods. - Maintain equipment. Smokey plant to be stopped until repair works completed. Turn off vehicle engines whilst not in use (no long periods of idling)	✓	✓	✓		Daily	Weekly		As required		SS
1	Dust Generation (Demolition)	Breakers and crushing equipment to be fitted with dust filtration equipment or water sprays to control dust emissions.			✓		Daily	Weekly during works	✓	As required		SS
1	Dust Generation (Construction)	- Minimise areas of site disturbed, and stage works where possible. - Dust suppression strategies to be used, i.e., water sprays, soil binders, hydro mulching, controlled speed onsite, road base + shaker grids. - Stockpiled topsoils and rubble will be restricted to 4m high. Stabilise if in-situ for >4-6months. On site drilling or coring operations will be undertaken by equipment fitted with air filtration equipment.	✓	✓			Daily	Weekly		As required		SS
2	Odour	- If odorous materials uncovered, recover immediately. - Seek advice from consultant regarding soil /materials management.		✓		✓	Daily	Weekly		As required		SS
3	Greenhouse	- Ensure purchased electrical products/whitegoods products comply with specification for CFCS & energy ratings - Low solvent paints to be used as a priority - Building to conform to AGBR or Green Star performance criteria - Deliveries / transport from site effectively planned to limit inefficient transport, assist back loading etc		✓						As required	✓	CA SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
4	Stormwater (Discharge from sedimentation basins, flooding)	- Water quality to meet ANZECC Water Quality Guidelines. → Conduct water quality test (external test company) NTU and TSS to determine the best treatment and acceptable levels - (Generally) PH 6.5- 8.5, Turbidity <50NTU, No visible oil & grease - Obtain advice for use of flocculants to settle sediment from water. - Sedimentation pond to be maintained at low levels to ensure capacity during rainfall event. - DO NOT DISCHARGE IF CONTAMINANTS SUSPECTED. Obtain advice.	✓	EP-001		✓	Daily during discharge	Weekly		As required	✓	SS
5	Adjoining waterways (dewatering, soil erosion & runoff)	- Temporary drainage systems will be established to divert clean waters around the land development areas as appropriate. - Erect silt fences, bunds and construct swale drains. - Concrete Bunded washouts plastic lined - Inspect at least weekly & after rainfall.		EP-001		✓	Daily during discharge	Weekly		As required	✓	SS
5	Adjoining waterways (dewatering, soil erosion & runoff)	- Maintain and/or replace as required. - Refer NSW Department of Housing's Managing Urban Stormwater (2004). - Street sweepers will be employed on regular basis.										
6	Sewer (Trade waste)	- No paints or other chemical to be poured down drains. - If required, obtain trade waste licence for discharge or local council approval.		EP-001		✓				As required	✓	SS
7	Land (Acid sulphate soils, contaminated soils, imported fill)	- Stop work if unexpected potentially contaminated soils are encountered. - Obtain waste classification from consultant in accordance with EPA guidelines Environmental Guidelines: Assessment, Classification & Management of Liquid & Non-Liquid Wastes (June 2004) www.environment.nsw.gov.au/waste/envguidlms/index.htm.	✓		✓	✓	Daily	Weekly	✓	As required	✓	SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
		- Where required a Remediation Action Plan will be developed and implemented. - Sign off by Site Auditor may be required to validate clean-up. - Any groundwater or ponded rainwater will be tested and classified by consultants prior to disposal. - Check Geotech requirements. Ensure soil classification suitable for land use i.e. Schools, residential, commercial etc.	✓	EP-002	✓	✓	Daily	Weekly	✓	As required	✓	SS
7	Land	- Potential for acid sulphate soils will be assessed based on the sites proximity to low-lying coastal areas e.g., coastal plains, wetlands and mangroves where the surface elevation is less than five metres above mean sea level. - If odorous soils (rotten egg gas) or grey/yellowed mottled soils encountered, stop work. - If suspected, consultant to prepare Acid Sulphate Soil Management Plan (ASSMP). - Excavation and neutralisation to be supervised by consultants as per ASSMP. - The requirements to import fill will be minimised by utilising on site cut material wherever possible. - All analysis certificates shall be handed over as part of the completion documents to the client. - Record all imported fill on Form 25.08 - Product Identification & Traceability. - Mark up locations where fill compacted in site plan. Survey if required.										
8	Resources - water, materials, energy	- For design and construct jobs, refer to the design specification for ESD requirements and product choices. - Buy local wherever possible to reduce impacts of transport on environment.		✓		✓					✓	PM
9	Noise	- Refer to SSD for noise restrictions and working hours. Approved working hours are reflected in Section 2.4. - Use hoarding or acoustic mats as required. - Situate generators and plant away from sensitive receivers. - Turn off machinery. Maintain equipment and stop noisy plant until repaired. - No early deliveries.	✓		✓	✓	Daily	Weekly	✓	As required	✓	SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
10	Vibration	- Conduct dilapidation report prior to work starting. - Limit the use of vibratory rollers, rock breakers, impact piling etc adjacent to buildings (>7m). - Regenerated noise may also transfer through bedrock and building structures. - Obtain advice if required.	✓		✓	✓	Daily	Weekly	✓	As required	✓	SS
11	Community Concerns	- Provide information (e.g., Signage, letterbox drops) to community on programmed works - Provide contact name for inquiries. - Advice locals of "noisy" work. - If required in noise sensitive areas and/or in response to complaints, engage consultants to undertake monitoring at nominated receivers. - Vehicles will not be permitted to queue outside the site or in residential areas unless a defined area is established which does not adversely impact on neighbours.	✓				Daily	Weekly		As required		PM SS
12	Flora	- Review planning documentation to determine the presence of any protected, threatened or significant flora. Obtain approvals as required. - Engage arborist to develop tree management plan or refer DA and arborist reports. - Education and training at site toolbox meetings and induction. - Report all sightings to the site manager. - Fence or barricade protected flora at the drip zone. Erect Keep Out signage. - Do not stack materials under/against trees. - The potential for reuse of vegetative wastes by mulching, chipping or on-site placement of trunks or limbs shall be reviewed for each project.	✓	✓		✓	Daily	Weekly		As required	✓	SS
13	Fauna	- All native animals protected. - Review planning documentation to determine the presence of any protected, threatened or significant fauna. Obtain approvals as required. - Site rules/induction to include information regarding of the - For injured animals, to relocate call WIRES	✓	✓		✓	Daily	Weekly	✓	As required	✓	SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
14	Waste	- Hazardous materials surveys to be completed. - Materials to be removed prior to demolition - Registers and waste disposal requirements as per Work Cover and EPA requirements for removal, storage, transport and disposal. - General site wastes -use one bin system and sort in contractors' yard to produce quantities of material for recycling, reuse, disposal etc. - Empty drums are to be taken off-site for disposal. - Empty drums shall be crushed prior to recycling/disposal. - Do not overfill skip bins. Provide plenty for use. Cover where potential for windblown litter.	✓	EP-002	✓	✓	Daily	Weekly	✓	As required	✓	SS
15	Litter											
16	Landfilling	- Reduce, reuse and then dispose - Landfill space scare leading to increased tipping costs - Dispose of hard construction wastes for recycled gravels and sands - Do not send soil to landfill until alternatives for beneficial reuse have been explored as per consultant's advice. - Consideration should be given to chipping of the vegetation and reuse - Reuse packaging to protect works		EP-002			Daily	Weekly		As required	✓	SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
17	Chemicals	- Chemicals to be stored in bunded areas (impervious + 110% of largest container) away from stormwater drains & pits. - Refer Workcover Code of Practice for Storage & Handling of Dangerous Goods, EPA Guidelines for Bunding & Spill Management. Appropriate chemicals storage is in conformance with: → AS 1940 The Storage and Handling of Flammable and Combustible Liquids → Storage and Handling of Dangerous Goods workover Code of Practice 2005- refer p. 86 - EPA requirements http://www.environment.nsw.gov.au/mao/bundingspill.htm - Ponded water within bunds will not be discharged to stormwater. - Fuel and hydraulic leaks to be cleaned up immediately. - Drilling muds to be contained within bunds and reused. - Liquid paints NOT to be poured down drains. Spread on waste cardboard or similar and leave to dry. Paint brushes to be rinsed and paint solids allowed to settle. Container of paint solids to be disposed to liquid waste facility. - Construct concrete washout pit for washout, away from stormwater drains. Send back to batch plant where possible.	✓	EP-002	✓		Daily	Weekly	✓	As required		SS
	Chemicals	- Concrete cuttings to be contained and wetvac to prevent runoff into stormwater drains. - Storage of bulk fuels (>200L) on site is prohibited. All refuelling shall be undertaken by a mobile facility with appropriate spill control and containment control equipment. - MSDS's must be provided to the Site supervisor prior to a chemical being received on site and by subcontractors using chemicals/products.	✓	EP-002	✓		Daily	Weekly	✓	As required		SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
18	Traffic	- Develop and implement traffic management plans. Submit to local council as required. - Signage and notices regarding disruptions. - Use crushed concrete, mulches etc along site access roads. - Install shakers and wheel wash as required. - Organise regular street sweeping. - Haulage routes and rules will be provided to subcontractors prior to commencing on site. - All loads of soil, demolition wastes, general wastes etc are to be tarped.	✓	TMP s		✓	Daily	Weekly		As required		SS
19	Aboriginal heritage	- Education and training at site toolbox meetings and induction. - It is illegal to destroy heritage items. - Review local or regional environmental plans, or on the State Heritage Register is to be consulted prior to work starting onsite. - Obtain excavation permit issued by the Heritage Council of NSW if required. - Any heritage relics or sites discovered during construction shall be reported to the NSW Heritage Office. - Work in the subject area to cease until specialist advice is obtained. - The area will be fenced, and signs erected to restrict access. - Heritage consultants may be required to provide advice on demolition/construction processes and finishes.	✓	✓		✓	Daily	Weekly		As required	✓	SS
20	European heritage	- Education and training at site toolbox meetings and induction. - It is illegal to destroy heritage items. - Check the Aboriginal Heritage Information Management System (AHIMS). - Also check the register of the National Estate. - Obtain approval from NPWS (Section 90 consent).	✓	✓		✓	Daily	Weekly		As required	✓	SS

Environmental Aspect		Environmental Actions, Controls and Criteria	Operational Controls				Effectiveness of Controls			Checking, Corrective & Preventative Action		Resp.
21	Emergency Preparedness:	- Spill kit onsite. - Refer to the MSDS for advice and procedures. - All spills must be reported to the FM & cleaned up. Complete RCC Accident /Incident report. - Sed pond pumped out regularly to maintain capacity in case of emergency - Ensure you know where stormwater drains are and have materials to block them in case of a fire.	✓	✓			Daily	Weekly		As required		SS

4.8. ENVIRONMENTAL CONTROL MAPS OR PLANS

The environmental control maps and/or plans that are relevant to the Project construction works are:

- Site context plans provided within this CEMP.
- Tree protection zones, shown within the arborist report for both sites.
- Sensitive receivers relating to the noise and vibration impacts of the construction works, presented in the Construction Noise & Vibration Management Sub-Plan.
- Erosion and sediment control measures, shown on the erosion and sediment control plans within the Construction Soil & Water Management Sub-Plan.

4.9. ENVIRONMENTAL MANAGEMENT DOCUMENTS

The environmental management documents that will be implemented as part of the environmental management system include:

- Environmental Site Inspection Checklist
- Complaints Register
- Hazardous substances register
- Waste register
- High Risk Works Project Assessment
- Asbestos (Hazmat) Register
- Imported/Exported Materials Register
- Sub-Contractor high risk safe work method statement (where environmental risks are present)

4.10. COMPLIANCE MONITORING AND REPORTING

As this EMP is a CEMP, and only applicable to the construction phase of the development, the post approval compliance monitoring and reporting requirements (which apply to operation/occupation) do not apply.

An operational management plan will be prepared by the Applicant, which will address the post approval compliance monitoring and reporting requirements of the project.

4.11. ENVIRONMENTAL AUDITING

This development will be audited in accordance with the Department's Independent Audit Post Approval Requirements.

4.12. ENVIRONMENTAL INCIDENT AND EMERGENCY PLANNING, PREPAREDNESS AND RESPONSE

Project Personnel Responsible for Managing Environmental Incidents and Emergencies

- Project Manager
- Site Manager

- WHS&E Manager
- Business Systems & Environmental Manager

Contact Details for Emergency Services (ambulance, fire brigade, police, spill clean-up services and others if relevant)

ORGANISATION	NAME	PHONE (W)	PHONE (M)
WorkCover	-	Hotline for incident reporting 13 10 50	
Fire Brigade/HAZMAT	Emergency	000	
Police	Emergency	000	
Environment Protection Authority (EPA)	-	02 9211 4723 Head Office 02 9995 5000 Parramatta	After Hours Pollution line 131 555
SSD – Dept of Planning Compliance contact	-		

Location of On-Site information on hazardous materials, including safety data sheets and spill containment materials

Information on hazardous materials, including safety data sheets and spill containment materials will be located in or adjacent to the project first aid shed. This will be located in the location deemed most suitable for the progress/status of works at any time.

4.13. CORRECTIVE AND PREVENTATIVE ACTIONS

incident management and reporting

Incident reporting and Investigation refer to internal management system.

Definitions:

Class 1: Dangerous occurrence, or actual harm to an ecosystem, property loss or clean up exceeds \$10,000 (as prescribed in 2.1.) Class 1 incidents and some cases Class 2 (as determined by senior management) will be investigated, as directed by BS Environmental Manager, WHS Head of Safety and/or where required initiate the RCC Business Continuity Plan

Form 030 Investigation Report will be completed by the BS Environmental Manager or Senior Safety Advisors and the original forwarded to the Project Manager and reviewed by the BS Environmental Manager WHS Head of Safety and reported to Senior management and Executives/Board.

Class 2: Major Leak, spill or escape off site of liquids, near miss/dangerous occurrence i.e. plant/equip damage, disruption to services. Note: Some Class 2 will be investigated at the discretion of the BSM / WHS Head of Safety

Class 3: Minor Leak, spill or escape off site of liquids all less than >10lts, Dust, Vibration

The Site Manager/Supervisor will ensure that all Class 2 and Class 3 incidents in or around the site, involving RCC personnel, subcontractors, visitors or passers-by, external authorities, Unions etc. are reported regardless of how minor they appear at the time of the occurrence.

Duty to Notify Environment Protection Authority (EPA) of Pollution Incident – notifiable incident

Pollution Incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur. It includes an incident or set of circumstances in which a substance has been placed or disposed on the premises, but it does not include an incident or set of circumstances involving only the emission of noise.

Incidents that require a (Duty to Notify) to the regulatory authorities EPA Pollution line (phone 131 555) under section 148 of the Protection of the Environment Operations Act 1997 (POEO Act) are:

- If the actual or potential harm to the health or safety of human beings or ecosystems is not trivial,
- If actual or potential loss or property damage (including clean-up costs) associated with a pollution incident may exceed \$10,000

For all Notifiable Incidents, the following activities should be undertaken:

- The incident site must not be disturbed until an inspector arrives at the scene or directs otherwise, this may include plant, substance, structure or thing associated with the incident. The person with management or control of the workplace is responsible for preserving the incident site, so far as reasonably practicable
- The incident site will be preserved unless it prevents any action needed to:
 - minimise the risk of further notifiable incident
 - facilitate a EPA investigation

For Regulator “reportable incidents”, the Supervisor will notify the Project Manager, Business Systems Environmental Manager and or WHS Head of Safety to seek advice, then immediately prepare the submission of Notification to the regulator.

Business Systems Environmental Manager and or WHS Head of Safety will confirm and organise legal representation to assist in the preparation of the reports and initiate the RCC Business Continuity Plan

In some contracts it is a requirement to notify the Client’s Representative immediately e.g. GC21 Contracts and relevant DPIE SSD reportable incidents

incident debrief / closure

Where an investigation is undertaken and it is determined that an “incident debrief ” is to be carried out using [Form 04.10](#), the Incident debrief will be distributed to all relevant stakeholders and Senior / Executive Management.

Outcomes of Investigations / findings may initiate an internal Alert for distribution.

Non Conformance

In the event of breach in the requirements of the EMP, such as:

- Non compliance with the RCC/ subcontractors SWMS or other environmental procedures;
- Non complying activities noted during site inspections (high risk or potential for legal breach);

- Following concerns regarding potential breaches in environmental legislation raised by RCC, the client or other stakeholders such as local council or the EPA;
- Changes to the RCC system or subcontractors procedures, as a result of corrective or preventative action following an environmental incident, inspection or external audit.

Form 31.1 – Non Conformance Report or via Aconex will be completed and issued to the offending party.

Non Conformances will be registered in Form 31.2 Non Conformance Report Register or on soft copy.

A copy of the Non Conformance Notice will be forwarded to the Project Manager and the subcontractor, who will implement appropriate corrective action.

Additionally Contractors Notices or Main Contractor Notices may be issued in certain circumstances, as described in Section 2 of the PMP.

5. CEMP REVIEW AND REVISION PROCESS

To ensure this CEMP remains current and relevant to the project, it will be reviewed in accordance with SSD Conditions of Consent once received

Where a review is required, the **CEMP Review Checklist (provided overleaf)** will be used. This will determine why a review is required, who needs to be involved in the review, if revision is required as a result of the review, and what the revision is, if required.

If this CEMP is revised, it will be submitted to the Department (and/or other party as required by the conditions of consent) for assessment and approval in accordance with the requirements of the relevant conditions of consent and the review process that was documented and approved in the earlier version/s.

The revised version of the revised EMP will be provided to the Department, and accompanied by information that identifies:

- what has changed and why it has been changed
- the proposed timeframe to implement the change.

A brief summary of the changes made and the circumstance/s that triggered the review and revision will also be included in the version control information.

Complete this checklist if a review of this CEMP or its sub-plans is triggered (see section 5 for applicable triggers).

CEMP Review Checklist		
	Person Completing Checklist:	Date:
1	Why is a review required? <i>Outline what has triggered the review. Use the triggers from Condition A29 & A30 of the SSD Consent.</i>	
2	What sections of the CEMP and/or Sub-Plans require a review? <i>List all that apply.</i>	
3	Notify the Planning Secretary that a review is being carried out, with a description of the extent of the review. <i>Provide evidence of notification.</i>	
4	Who is required to be involved in the review? <i>Identify the relevant consultants, project staff and/or authorities who may need to be involved in the review.</i>	

CEMP Review Checklist		
5	Conduct review. Do the CEMP sections and/or Sub-Plans being reviewed still address the specific requirements of the development? If Yes, no revision is required. State why no revision is required and file a completed copy of this checklist for reference. No further action is required. If no, revision is required. Go to step 6. <i>Note – if a review has been triggered, the specific trigger will generally highlight what information in the CEMP or it's Sub-Plans is not adequately addressing the specific requirements of the development.</i>	
6	Revise CEMP and/or relevant Sub-Plans. Engage with relevant stakeholders where required. Consult with relevant parties about revision where required.	
7	Issue updated CEMP and/or Sub-Plans to the Planning Secretary (and/or other party as required by the conditions of consent) for assessment and approval (if approval is required).	
8	Provide a summary that identifies: - What has changed and why it has been changed - The proposed timeframe to implement the change	
9	Ensure revision information and the circumstances that triggered the review is included in the version control information of the revised document.	

6. APPENDICES

6.1. EMP PREPARATION CHECKLIST

Requirement	Plan Reference	Yes/No/Not Applicable
<i>Document preparation and endorsement</i>		
Has the EMP been prepared in consultation with all relevant stakeholders as per the requirements of the conditions of consent? (Section 4.1)	Appendix 6.2	Yes
Have the views of the relevant stakeholders been taken into consideration? Have appropriate amendments been made to the EMP and does the EMP clearly identify the location of any changes? (Section 4.1)	Throughout, Sub-Plans.	Yes
Has the EMP been internally approved by an authorised representative of the proponent or contractor? (Section 4.2)	Revision Register, Page 5	Yes
<i>Version and content</i>		
Does the EMP describe the proponent's Environmental Management System (EMS) (if any), and identify how the EMP relates to other documents required by the conditions of consent? (Section 3.5.1)	Section 4.1	Yes
Does the EMP include the required general content and version control information? (Section 3.1)	Pages 2-5	Yes
Does the EMP have an introduction that describes the project, scope of works, site location and any staging or timing considerations? (Section 3.2)	Section 1 & Section 2	Yes
Does the EMP reference the project description? (Section 3.3)	Section 2, Page 12	Yes
Does the EMP reference a Community and Stakeholder Engagement Plan (or similar) or include community and stakeholder engagement actions (if required)? (Section 3.4)	Section 3	Yes
Have all other relevant approvals been identified? Has appropriate information been provided regarding how each approval is relevant? (Section 4)	N/A	N/A
Has the environmental management structure and responsibilities been included? (Section 3.5.2)	Section 4	Yes
Does the EMP include processes for training of project personnel and identify how training and awareness needs will be identified? (Section 3.5.3)	Section 4.4	Yes

Does the EMP clearly identify the relevant legal and compliance requirements that relate to the EMP? (Section 3.5.3)	Section 4.3	Yes
Does the EMP include all the conditions of consent to be addressed by the EMP and identify where in the EMP each requirement has been addressed? (Section 3.5.13)	CEMP Condition Compliance Table, Pages 6-9	Yes
Have all relevant guidelines, policies and standards been identified, including details of how they are relevant? (Section 3.5)	N/A	N/A
Is the process that will be adopted to identify and analyse the environmental risks included? (Section 3.5.5)	Appendix 6.3	Yes
Have all the environmental management measures in the EIA been directly reproduced into the EMP? (Section 3.5.7)	Throughout, Sub-Plans	Yes
Have any additional environmental management measures been included in the EMP? (Section 3.5.7)	N/A	N/A

6.2. RECORD OF CONSULTATION

CEMP Consultation Requirements		
#	Condition	Location
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: (b) be prepared in consultation with Council and TfNSW;	A Sub-Plan specific consultation summary for Condition B15 has been prepared and provided with the Construction Traffic and Pedestrian Management Sub-Plan. See Appendix 6.7.
B17	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: (d) include strategies that have been developed with the community for managing high noise generating works; (e) describe the community consultation undertaken to develop the strategies in condition B14(d);	A CCS in accordance with Condition B10 has been prepared and provided with the Construction Noise and Vibration Management Sub-Plan. See Appendix 6.8.
B19	The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council;	A Sub-Plan specific consultation summary for Condition B18 has been prepared and provided with the Construction Soil and Water Management Sub-Plan. See Appendix 6.9.

6.3. PROJECT ENVIRONMENTAL RISK MATRIX/ASSESSMENT

The Project Environmental Risk Matrix/Assessment is not embedded in this document; it is provided as an attached appendix so that it can be displayed/updated/revised in isolation if required.

6.4. ENVIRONMENTAL POLICY

The Richard Crookes Constructions Pty Ltd Environmental Policy is not embedded in this document, it is provided as an attached appendix so that it can be displayed/updated/revised in isolation if required.

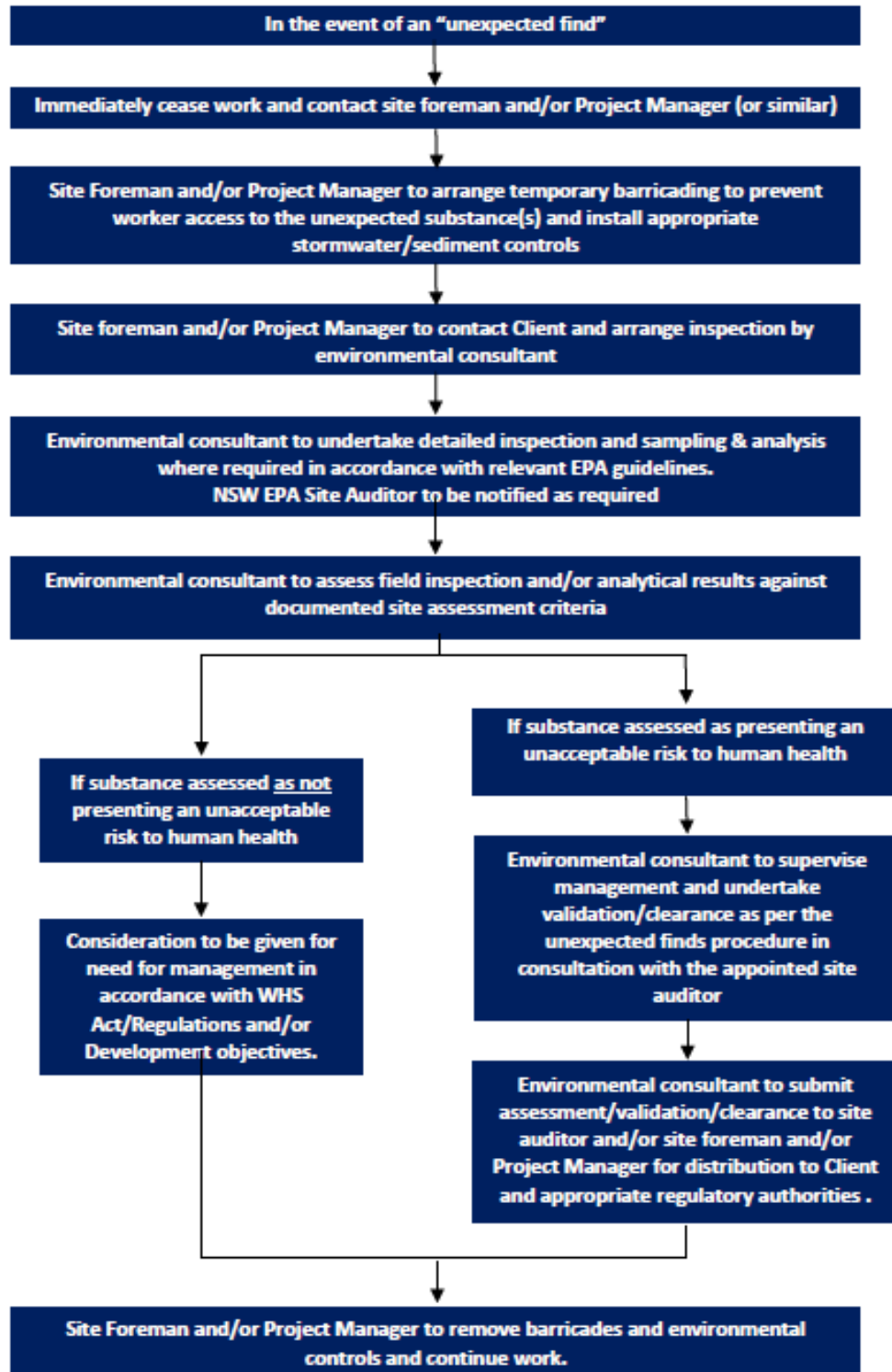
6.5. ASBESTOS MANAGEMENT PLAN

The Asbestos Management Plan is an internal RCC document used to manage asbestos if encountered on site and will also form part of the RCC PMP.

6.6. UNEXPECTED FINDS PROTOCOL – UXO & CONTAMINATION

The objective of this protocol is to provide an appropriate UFP presenting a framework Providing the actions required to adequately protect human and environmental health should small scale unexpected finds relating to potential soil and/or groundwater contamination be identified during the proposed development works.

In the event that unexpected contamination conditions are identified, application of this UFP will include proponent engagement of an independent site auditor to review the assessment works completed and provide confirmation to the proponent that the assessment and any subsequent management and/or remediation has been completed to an appropriate standard in accordance with relevant NSW EPA Guidelines and/or NSW legislation/regulations as in force at the time of the audit. The process is outlined in the below flowchart:



All unexpected finds identified on site should be documented in an **unexpected find register** by the Principal Contractor. An example register is provided below. A copy will be made available onsite to allow initial documentation of any unexpected finds and to provide a record of successfully managed unexpected finds.

Unexpected Find ID	Contaminant Identified	Location	Characterisation Sample Lab Batch	Classification	Validation Sample Lab Batch	Validation Achieved?

The below poster will be displayed on site, to prompt the broader site to remain vigilant when it comes to unexpected finds and the UFP.



MANAGEMENT PROTOCOL IN EVENT OF DISCOVERY OF EXPLOSIVE ORDNANCE (EO), UNEXPLODED ORDNANCE (UXO) or EXPLOSIVE ORDNANCE WASTE (EOW)

Purpose

This Protocol describes the procedure to be followed in the unlikely event that Explosive Ordnance (EO), Unexploded Ordnance (UXO) or Explosive Ordnance Waste (EOW) is discovered at the site

Potential Ordnance Risk

A UXO Risk Assessment has assessed the risk of encountering an item of UXO or EO within the site is negligible and is already 'As Low As Reasonably Practicable' (ALARP).

Nonetheless, there can be no guarantee that no such items will ever be encountered. As such, it is appropriate to have an established Protocol to follow in the very unlikely event that such an item is found. This Protocol has been developed to guide the project in the unlikely event that a worker finds an item of UXO, EO or EOW.

Identification and Characteristics of Explosive Ordnance Waste (EOW)

EOW is the waste material, such as packaging, fragmentation or casings, of munitions that have been fired or used. EOW poses no threat. However, it should not be handled unless essential to do so and only then if (a) it is 100% definite that the item is EOW and (b) it is necessary to shift it.



You MUST report each find of EOW to your supervisor/site management

Identification and Characteristics of Explosive Ordnance (EO) & Unexploded Ordnance (UXO)

EO and UXO is any military munition that still contains explosive material. Basically, it looks like what you would expect a military munition to look like.



**IF YOU FIND EO, UXO OR ANY SUSPICIOUS ITEM, YOU MUST TREAT IT AS A UXO.
DO NOT TOUCH IT!!
IMMEDIATELY REPORT IT TO YOUR SUPERVISOR/SITE MANAGEMENT**

UXO Awareness

Remain aware of your surroundings, do not touch or go near any UXO or suspicious items and report any suspicions or concerns about UXO to your Supervisor/Site Management.

Avoid radio transmissions or use of mobile phones within a 50-metre radius of any UXO and keep vehicles with VHF/HF radios at least 150 metres away from UXO.

ACTION TO BE TAKEN IF A SUSPICIOUS ITEM IS ENCOUNTERED

1. If UXO, a munition or suspicious item is found, **STOP** all work **IMMEDIATELY** within **50 metres** of the location of the item and **NOTIFY** all other people within the immediate area.
2. **DO NOT TOUCH THE ITEM!**
3. If possible, place a recognisable marking nearby but at a safe distance from the item so it can be easily found again and take a digital photograph of the item that can be forwarded to Police if appropriate.
4. All people are to **WITHDRAW** from the immediate area (minimum of 50 metres) as soon as possible.
5. Immediately **REPORT** the item to a **SUPERVISOR/SITE MANAGEMENT** and provide the following detail:
 - The **LOCATION** of the item.
 - A **DESCRIPTION** of the shape, colour, material and approximate dimensions of the item (gathered without physically touching the item).
 - Any **MARKINGS ON THE ITEM** (again, identified without physically touching the item).
 - The location and markings placed near the item.
6. The **SUPERVISOR** is to:
 - Ensure all people are **WITHDRAWN** from the immediate area.
 - **ISOLATE** the area.
 - **PREVENT** movement into the area.
 - **NOTIFY SITE MANAGEMENT** at the work site.
7. **SITE MANAGEMENT** will notify the local Police of the find. They, in turn, will notify Defence and request that they investigate and deal with the item.
8. Work is **NOT** to **RECOMMENCE** within the immediate area of the item until it has been dealt with by Police or Defence and **SITE MANAGEMENT** has notified that it is safe to re-enter the area.

6.7. UNEXPECTED FINDS PROTOCOL – ABORIGINAL AND NON-ABORIGINAL HERITAGE

The report makes the following recommendations:

- 1) Due to the prior quarrying and filling of the site, it is highly unlikely that any Aboriginal objects are located on the site. Therefore, there is no objection to the proposed redevelopment of the site in respect of Aboriginal archaeology. It will not be necessary to undertake any further assessment, testing, salvage or monitoring.
- 2) It will not be necessary to apply for an Aboriginal Heritage Impact Permit.
- 3) In the unlikely event that construction activity reveals unexpected Aboriginal objects the following procedure for handling unexpected archaeological sites and objects is to be followed:
 - a. All work is to halt at that location immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management;
 - i. Stop all activities; and
 - ii. Secure the site.
 - b. Contact the project archaeologist to assess the find and determine if it is consistent with the Project Approval;
 - i. If the find is consistent, the archaeologist will allow work to continue
 - ii. If the find is inconsistent, Heritage NSW will be notified as soon as practical on 131555 providing any details of the Aboriginal object and its location. Work cannot recommence unless authorised in writing by Heritage NSW.
- 4) Human remains in, on or under the land must not be harmed. The procedure for handling human remains has been undertaken in accordance with the Skeletal Remains – Guidelines for the Management of Human Skeletal Remains under the Heritage Act 1977 (NSW Heritage Office 1998) and the Aboriginal Cultural Heritage Standards and Guidelines Kit (NPWS 1997). In the event that construction activity reveals possible human skeletal material (remains), the following procedure is to be followed:
 - a. As soon as remains are exposed, all work is to halt at that location immediately and the Project environmental manager on site is to be immediately notified to allow assessment and management;
 - i. Stop all activities; and
 - ii. Secure the site.
 - b. Contact police, the discovery of human remains triggers a process which assumes that they are associated with a crime. The NSW Police retain carriage of the process until such time as the remains are confirmed to be Aboriginal or historic;
 - c. The approval authority will be notified when human remains are found;
 - d. Once the police process is complete and if remains are not associated with a contemporary crime contact Heritage NSW. Heritage NSW will determine the process as appropriate;
 - i. If the remains are identified as Aboriginal, the site is to be secured and all Aboriginal stakeholders and Heritage NSW are to be notified in writing; or
 - ii. If the remains are identified as non-Aboriginal (historical) remains, the site is to be secured and Heritage NSW is to be contacted.

- e. Once the police process is complete and if the remains are identified as not being human, work can recommence once the appropriate clearances have been given.



My contact details are:

M 0419 118 399

E veronica.norman@comber.net.au

Kind regards,

VERONICA NORMAN
ARCHAEOLOGIST
HERITAGE CONSULTANT



New Primary School in Mulgoa Rise
Aboriginal Archaeological Assessment

EXECUTIVE SUMMARY

School Infrastructure NSW propose to construct a new primary school at 1-23 Forestwood Drive, Glenmore Park. The school will initially accommodate up to 414 students, with the potential to expand to 1,000 students as demand arises. Any future expansion of the school will be the subject of a separate planning approval.

To ensure that Aboriginal archaeology and cultural heritage would not be adversely impacted upon by the proposal, Comber Consultants was engaged to undertake this Aboriginal archaeological assessment. This report is written in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*.

The report makes the following recommendations:

- 1) Due to the prior quarrying and filling of the site, it is highly unlikely that any Aboriginal objects are located on the site. Therefore, there is no objection to the proposed redevelopment of the site in respect of Aboriginal archaeology. It will not be necessary to undertake any further assessment, testing, salvage or monitoring.
- 2) It will not be necessary to apply for an Aboriginal Heritage Impact Permit.
- 3) In the unlikely event that an Aboriginal object is uncovered, all work must cease in the vicinity of that object and the consultant contacted for further advice.

6.8. CONSTRUCTION TRAFFIC AND PEDESTRIAN MANAGEMENT SUB-PLAN

The Construction Traffic & Pedestrian Management Sub Plan has been prepared by PTC Traffic Engineers for the Project.

It is not embedded in this document; it is supplied as an attached appendix so that it can be displayed/updated/revised in isolation if required.

6.9. CONSTRUCTION NOISE & VIBRATION MANAGEMENT SUB-PLAN

The Construction Noise & Vibration Management Sub-Plan has been prepared by Pulse White Noise Acoustics for the Project.

It is not embedded in this document; it is supplied as an attached appendix so that it can be displayed/updated/revised in isolation if required.

6.10. CONSTRUCTION WASTE MANAGEMENT PLAN

The Construction Waste Management sub-Plan has been prepared by EcCell Consulting for the Project.

It is not embedded in this document; it is supplied as an attached appendix so that it can be displayed/updated/revised in isolation if required.

6.11. CONSTRUCTION SOIL & WATER MANAGEMENT SUB-PLAN

The Construction Soil & Water Management sub-Plan has been prepared Woolacotts Consulting Engineers for the Project.

It is not embedded in this document; it is supplied as an attached appendix so that it can be displayed/updated/revised in isolation if required.

6.12. EXTERNAL LIGHTING

The design certificates attached as Appendix 6.12 detail compliance with this SSD Consent Condition for the proposed works.



23 March 2022

Richard Crookes Constructions
Level 3
4 Broadcast Way
Artarmon NSW 2064

Attention: Amy Warton

MULGOA RISE PUBLIC SCHOOL – SSDA CONDITIONS COMPLIANCE CERTIFICATE

NDY confirm that our design documentation is in accordance with the following relevant SSDA Conditions from the SSD-11070211 - MRPS SSDA Development Consent Conditions issued via Aconex Ref. RCC-GCOR-003537, dated 18 March 2022, as outlined below:

SSDA Ref. No.	SSDA Condition	Comment
	Electrical Services	
B12	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting to be installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	NDY's design is in accordance with the referenced standards
C38	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	NDY's design is in accordance with the referenced standard

Regards,

NORMAN DISNEY & YOUNG

Michael Lewis
Associate Director

6.13. IMPACT OF EXTREMELY LOW FREQUENCY (ELF) ELECTROMAGNETIC FIELDS/ENERGY (EME)

6.13.1. SPECIFIC DESIGN MEASURES WITHIN THE SUBSTATION AND MAIN SWITCH ROOM

Within Padmount substations the following design measures have already been incorporated to mitigate the ELF magnetic field effects:

- a. The substation and main switchroom have located transformers, LV switchboards, busduct, heavy current cables and other potentially large sources of magnetic field in such a manner as to minimise ELF Magnetic Fields.
- b. Use space in proximity to the substation and similar ELF sources that is the space above, below and around its perimeter, for storage, passageways where electronic equipment susceptible to ELF fields will not be located.

The configuration of the Substation Low Voltage switchboard has busbars and a configuration mandated by Endeavour Energy regulations and cannot be modified to reduce the associated ELF magnetic field.

6.13.2. SPECIFIC DESIGN MEASURES WITHIN THE SCHOOL PREMISES

The following additional mitigation measures which can be effectively implemented shall also be considered for reduction of the ELF magnetic field effects, if not already incorporated:

- a. When designing a system of busbars for the Main Switchboards choose minimum allowable clearances between phases and between phases and neutral bus.
- b. Locate all cable trays as far as possible from the substation or switchroom ceiling and walls that separate it from the dedicated office space or other space which is sensitive to ELF magnetic fields.
- c. Use metallic encased busway for submains where possible.
- d. Where possible use three phase cables in preference to three single phase cables.
- e. Use trefoil configuration of phases to minimise the magnetic field.
- f. Avoid phase by phase groupings of single core cables in parallel circuits.
- g. Avoid any wiring which may result in large physical separation between the phase and neutral conductors.
- h. Ensure that the total return current flows in a return cable that shares the same route with the active conductor which conducts the forward current.
- i. Aim to distribute all single phase electrical load evenly between three phases of the main supply cables.
- j. For larger submains, where practical, use smaller sized multiple conductors per phase rather than a single larger sized conductor.

The application of general ELF mitigation measures will eliminate the requirement for direct ELF shielding in the vicinity of the substation.

6.14. COMMUNITY CONSULTATION AND COMPLAINTS HANDLING

The CCS will be generated by SINSW as required post receipt of the Condition of Consent.

6.15. FILL IMPORT PROTOCOL (FIP)

6.15.1. INTRODUCTION

JK Geotechnics provided a recommendation in the addendum letter to the Preliminary and Detailed Site Investigations (PSI / DSI) that a Fill Import Protocol (FIP) be prepared for the site and implemented as part of the Construction Environmental Management Plan (CEMP).

6.15.2. PURPOSE

The protocol outlines the actions which must be implemented to:

1. Prevent the import of fill material that presents a risk to the environment or human health
2. Prevent the importation of contaminated or asbestos containing materials
3. Ensure compliance with NSW regulatory requirements
4. Facilitate materials tracking and records keeping for site management

6.15.3. PRELIMINARY SITE INVESTIGATION (PSI)

The PSI was previously undertaken by JKE in June 2020. The PSI included a review of historical information, soil sampling from 12 boreholes, 10 test pits and groundwater sampling from one monitoring well installed on-site (see Figure 2 in Appendix A). The PSI identified that the site has historically been used quarrying activities and was rehabilitated from around the year 2000 via importation of material and controlled filling.

A timeline summary of the historical land uses and activities is presented in the table below.

Table 2-1: Summary of Historical Land Uses / Activities

Year(s)	On-site - Potential Land Use / Activities	Off-site - Potential Land Use / Activities
Circa early 1900s until at least 1982	Vacant land, overgrown with trees, shrubs and grasses, and possibly used for grazing purposes.	Vacant land, possibly used for agricultural activities (i.e. crop cultivation, market gardens) and/or grazing.
Since at least 1986 until 2007.	Quarry activities, which largely ceased by 2000.	Quarry activities which ceased by 2007.
2000-2007	Rehabilitation of land post quarry activities. Filling of the site occurred.	Rehabilitation of land post quarry activities. Filling of the surrounding land also occurred.
2007-Current	Vacant, levelled grassed area.	Mostly residential and recreational uses. Neighbouring land to the north remains vacant.

Based on the site history, potential sources of contamination were considered to include: historical mining/extractive industry (i.e. quarry); imported fill; and use of the site for car parking.

Based on the preliminary soil and groundwater analysis, soil or groundwater contamination that was assessed to pose a risk to on-site receptors and/or in relation to the proposed land use was not identified. Groundwater was found to be impacted by arsenic, nickel and zinc at concentrations that exceeded the ecological-based site assessment criteria (SAC). However, the occurrence of these heavy metals in the groundwater was considered likely to be attributed to regional factors.

Due to the presence of deep fill and the identification of potential sources of contamination, the PSI recommended a DSI.

6.15.4. DETAILED SITE INVESTIGATION (DSI)

The DSI included soil sampling from an additional 13 boreholes and 10 test pits, and groundwater sampling from three monitoring wells installed at the site. The DSI identified fill across the site ranging from depths of approximately 11.2m below ground level (BGL) to 14.2mBGL, underlain by siltstone bedrock. The fill typically comprised silty clay with inclusions of gravels indicative of natural clay and ripped bedrock used in a controlled filling exercise to rehabilitate the former quarry. Ash, and building rubble (bricks, steel, plastic, glass, terracotta, tile fragments) were encountered to a lesser extent, in minor quantities in fill. No stained soils or offensive odours were encountered during the investigation.

The laboratory analysis detected minor concentrations of heavy metals, total recoverable hydrocarbons (TRH) and polycyclic aromatic hydrocarbons (PAHs) within the fill (soil). All of the detected concentrations were below the respective human health and ecological-based SAC. The contaminant concentrations reported in soils were not considered to pose a risk to the receptors under the proposed land use scenario.

The laboratory analysis detected concentrations of arsenic, cadmium, copper, nickel and zinc within the groundwater beneath the site. With the exception of arsenic, nickel and zinc within the samples collected from MW8, all of the detected concentrations were below the respective human-health and ecological-based SAC. The concentrations of arsenic, nickel and zinc detected in the groundwater collected from MW8 exceeded the ecological-based SAC and were relatively consistent with the results obtained during the PSI. Overall, the minor elevations of these heavy metals in groundwater were assessed not to pose an unacceptable risk under the proposed land use scenario.

The DSI concluded that the site was suitable for the proposed primary school development. Remediation and/or further investigation was not considered to be required based on the information and data collected and evaluated at that time.

6.15.5. VERIFYING FILL MATERIAL

The following verification methods (relevant to the type of imported fill) must be completed prior to any fill being imported to site:

1. All subcontractors are to only source material from reputable suppliers, and issue all validation testing and waste classification results as requested.
2. Visual inspection or validation sampling to be undertaken as material is delivered to site.
 - a. Inspect for fragments or asbestos, and other general waste that is within the material
 - b. Smell for an odours within the fill
3. All imported fill is to be VENM with waste classification documentation to be provided as requested
4. Verification of all recycled DGB is to be provided prior to any material being delivered to site.

If there is any doubt in the suitability or cleanliness of the material being delivered to site, a qualified professional is to inspect, test and validate the materials suitability to be used for the project

6.15.6. MATERIALS DELIVERED TO SITE

Once the fill has been validated and confirmed suitable to be utilised on the project, the following steps must be implemented to when delivery and placing on-site:

1. Contractor issues VENM reports & geotechnical tests to RCC for review and approval
2. RCC accept the proposed imported fill material
3. Civil contractor imports fill to site, places and compacts to the project specification
4. Civil contractor tracks the imported fill material on a register including date, number, truck rego's, volume, fill source, and fill material



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