CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Access Logistics Park

884-928 Mamre Road, Kemps Creek

Prepared for:

Altis Property Partners
14/60 Castlereagh Street
SYDNEY NSW 2000

-

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BASIS OF REPORT

This report has been prepared by SLR Consulting Australia Pty Ltd (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with Altis Property Partners (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
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1 Introduction

1.1 Development Overview

SLR Consulting have been engaged by Altis Property Partners (Altis) to prepare a Construction Environmental Management Plan (CEMP) for the Access Logistics Park, a proposed warehouse and logistics hub to be located at 884-928 Mamre Road, Kemps Creek.

The proposal seeks to undertake site master planning for an industrial estate and construction of a warehouse on Lot 1, demolition of existing buildings, bulk earthworks, dewatering and subdivision works (the Project). A State Significant Development application seeking approval for the proposal is to be submitted to the Department of Planning, Industry and Environment's (DPIE)as the Consent Authority informed by Secretaries Environmental Assessment Requirements (SEARs). This CEMP will inform the assessment process.

The Project includes:

- Demolition of existing dwelling houses and associated outbuildings
- Bulk earthworks involving dam dewatering, cut and fill works and pad construction
- 16-lot Torrens title subdivision in two stages, with development parcels ranging in size from 3,203m^2 to 66,109m^2
- Construction of internal public estate roads of 24.6m and 26.4m wide and connections to existing and future local roads (including Mamre Road intersection works)
- Stormwater and drainage works including construction of onsite detention and bio retention basins
- Landscape of bio retention basins and street tree planting
- Infrastructure comprising civil works and utilities servicing
- Construction of one warehouse and distribution centre in Proposed Lot 1.

This CEMP has been prepared to cover the construction related phase of the Project. It is noted that this CEMP relates to the civil works and construction of the warehouse on Lot 2, with construction and development of future buildings on the site excluded.

1.2 Construction Environmental Management Plan

This Report has been prepared to demonstrate how the proposal has met the requirement of the SEARs for the Project with respect to construction environmental management. SEARs were issued for the proposal on 14 May 2021. The requirements of the SEARs and cross references to where these are addressed within this Report are included in **Table 1** below.

Table 1 SEARs Requirements and Report Cross References

SEARs Requirement	Report Cross Reference
a description of the measures that would be implemented to avoid, minimise, mitigate and if necessary, offset the potential impacts of the development, including developments for adaptive management and/or contingency plans to manage significant risks to the environment and	**Section 4**

SEARs Requirement	Report Cross Reference
a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS.	**Section 4 & 5**

This CEMP has been prepared to address the SEARs, informing DPIE's assessment of the proposed development application and has been prepared in consideration of the *Guideline for the Preparation of Environmental Management Plans* (Department of Infrastructure, Planning and Natural Resources 2004). It is recognised this CEMP is not static and will be reviewed and potentially modified following approval of and during the life of the project.

1.2.1 Scope

This CEMP has been prepared generally in accordance with the recommended inclusions found at Figure 4-1 of the *Guideline for the Preparation of Environmental Management Plans*. The specific recommended inclusions, along with where these requirements have been addressed within this CEMP, are listed in **2.**

Table 2 CEMP Context

Guideline Recommended Inclusions	CEMP Section
Background	
• Introduction	• **Section 1**
• Project Description	• **Section 1.1**
• EMP Context	• **Section 1.2**
• EMP Objectives	• **Section 1.2.2**
• Environmental Policy	• Not Applicable
Environmental Management	
• Environmental Management Structure and Responsibility	• **Section 3**
• Approval and Licensing Requirements	• **Section 3.2**
• Reporting	• **Section 5.2**
• Environmental Training	• **Section 3.3**
• Emergency Contacts and Response	• **Section 3.4.3**
Implementation	
• Risk Assessment	• **Section 5.4**
• Environmental Management Activities and Controls	• **Section 4**
• Environmental Management Plans or Maps	• **Section 4**
• Environmental Schedules	• **Section 4**
Monitor and Review	
• Environmental Monitoring	• **Section 5.1**
• Environmental Auditing	• **Section 5.3**
• Corrective Action	• **Section 3.4 & 3.5**
• EMP Review	• **Section 6**

1.2.2 Objectives

The objectives of this CEMP are to:

- Establish the framework for managing and mitigating the potential for adverse environmental impacts as a result of bulk earthworks and subdivision works.
- Address the SEARs and demonstrate to DPIE how the applicant proposes to meet all of its regulatory obligations;
- Outline the controls to be implemented by the contractor to meet their obligations;
- Assist to establish the Project in a manner that avoids, where possible or minimises impact to the surrounding environment and populace.
- Allow for flexibility and adaptation of this document subject to matters arising through the development assessment process and/or imposed conditions of consent.

2 Development Description

2.1 Location

The project site is legally described as 884-928 Mamre Road, Kemps Creek (Lot 52 & 53 DP259135).

The entire Site comprises a total area of approximately 20 hectares (ha) and is located within the Mamre Road Precinct pursuant to *State Environmental Planning Policy (Western Sydney Employment Area) 2009* (SEPP WSEA). The Site affords a primary frontage of approximately 450m to Mamre Road to the south west. Currently vehicular access to each lot is facilitated via a private access road off Mamre Road.

In its existing state, the Site comprises agricultural land, rural housing, farm sheds and vacant land. The Site is bound by agricultural land and rural residential dwellings. The Site is located within the Western Sydney Employment Area (WSEA) and is situated approximately 5km from Badgerys Creek, 20km from Parramatta and 39km from the Sydney CBD.

The Site is also within close proximity to transport infrastructure routes (predominantly the bus network), as well as sharing direct links with the wider regional road network, including Mamre Road, Elizabeth Drive, Lenore Drive, Erskine Park Road, the M4 Western Motorway and the Westlink M7. All of which provide enhanced connectivity to the Subject Site and immediate vicinity, as well as the wider locality.

The Site is subject to the provisions outlined within SEPP WSEA, which is the primary Environmental Planning Instrument (EPI) and categorises the Site within the IN1 General Industrial zone within the *Penrith Local Environmental Plan 2010*.

2.2 Construction Activities

The timeframe for construction commencement will be determined by the timing of development assessment and approvals through DPIE. Proposed construction activities include:

- Demolition of existing on-site buildings;
- Bulk and detailed excavation and earthworks;
- Dam dewatering;
- Internal road construction and street tree plantings;
- Construction and landscaping of onsite detention and bio retention basins;
- Subdivision works, including service provision and stormwater management works;
- Warehouse construction.

The proposed site layout is shown below in **Figure 1**.

2.3 Construction Hours

The following standard construction hours are proposed:

Table 3 Proposed Construction Hours

Activity	Day	Time
Earthworks and Subdivision Works	Monday – Friday Saturday Sunday and Public Holidays	7 am to 6 pm 8 am to 1 pm No works to be undertaken

The construction hours will be provided to all staff and contractors in the induction. Any work to be undertaken outside of the standard construction hours will be required to obtain an Out of Hours (OOH) approval. Any such works would necessarily be undertaken in accordance with the appropriate OOH protocols and approval processes.

2.4 Construction Contact Details

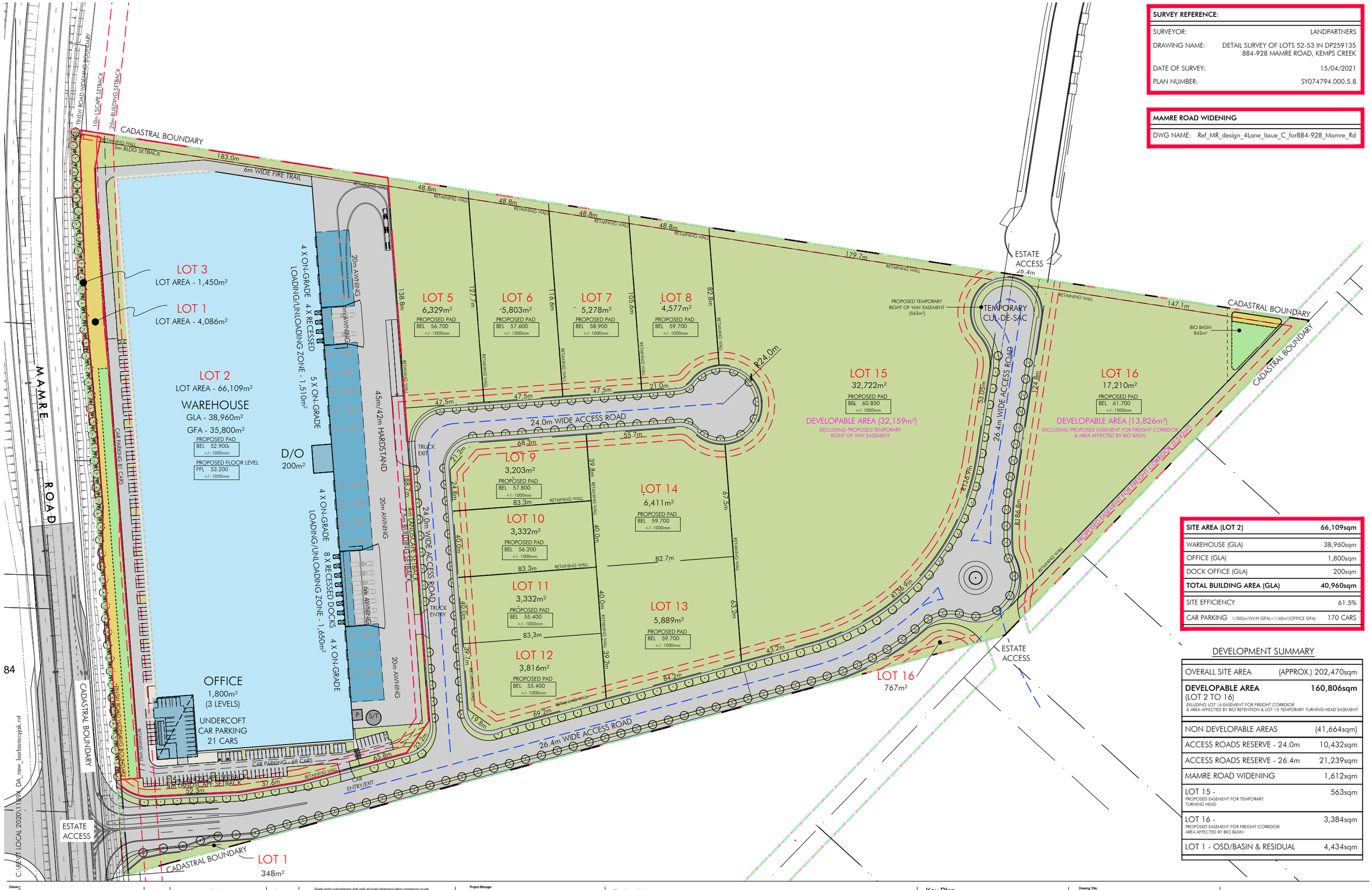
Table 4 lists the key contacts during the construction of the Project.

Table 4 Construction Contacts

Role	Name	Company	Contact Details
Project Manager	TBC	Project Strategy NSW	TBC
Site Manager	TBC upon engagement of contractor	TBC upon engagement of contractor	TBC upon engagement of contractor

2.5 Construction Site Access

Construction access is proposed from Mamre Road via a left in, left out arrangement, in the location of the future permanent access road connection. All construction vehicles will enter and exit the site in a forward-facing direction. The location of the Mamre Road connection is shown in **Figure 1** below.



SURVEY REFERENCE:	
SURVEYOR:	LANDPARTNERS
DRAWING NAME:	DETAIL SURVEY OF LOTS 52-53 IN DP259135 884-928 MAMRE ROAD, KEMPS CREEK
DATE OF SURVEY:	15/04/2021
PLAN NUMBER:	SY074794.000.5.8

MAMRE ROAD WIDENING	
DWG NAME:	Ref_MR_design_4Lane_Issue_C_for884-928_Mamre_Rd

SITE AREA (LOT 2)	**66,109sqm**
WAREHOUSE (GLA)	38,960sqm
OFFICE (GLA)	1,800sqm
DOCK OFFICE (GLA)	200sqm
TOTAL BUILDING AREA (GLA)	**40,960sqm**
SITE EFFICIENCY	61.5%
CAR PARKING 1/300m²(W/H GFA)+1/40m²(OFFICE GFA)	170 CARS

DEVELOPMENT SUMMARY

OVERALL SITE AREA	(APPROX.) 202,470sqm
DEVELOPABLE AREA (LOT 2 TO 16) EXLUDING LOT 16 EASEMENT FOR FREIGHT CORRDIOR & AREA AFFECTED BY BIO RETENTION & LOT 15 TEMPORARY TURNING HEAD EASEMENT	**160,806sqm**
NON DEVELOPABLE AREAS	(41,664sqm)
ACCESS ROADS RESERVE - 24.0m	10,432sqm
ACCESS ROADS RESERVE - 26.4m	21,239sqm
MAMRE ROAD WIDENING	1,612sqm
LOT 15 - PROPOSED EASEMENT FOR TEMPORARY TURNING HEAD	563sqm
LOT 16 - PROPOSED EASEMENT FOR FREIGHT CORRDIOR AREA AFFECTED BY BIO BASIN	3,384sqm
LOT 1 - OSD/BASIN & RESIDUAL	4,434sqm

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Client: ALTIS PROPERTY PARTNERS

Issue	Description	Date
P8	DRAFT - ISSUE FOR APPROVAL	13.07.2021
P7	DRAFT - ISSUE FOR APPROVAL	09.07.2021
P6	DRAFT - ISSUE FOR APPROVAL	02.07.2021
P5	DRAFT - ISSUE FOR APPROVAL	30.06.2021
P4	DRAFT - MAMRE ROAD AND SOUTHERN BDY UPDATED	11.06.2021
P3	DRAFT	08.06.2021
P2	DRAFT	14.05.2021
P1	DRAFT - CONTEXT SUBMISSION	14.04.2021

ISSUE FOR
S4.55

Project Manager: ProjectStrategy

Project Name

Project Address

884-928 Mamre Road, Kemps Creek, NSW

Key Plan
0 2000 5000

Drawing Title: **Masterplan / Benching Plan**

Author:	Checker:	Sheet Size:	Scale:
MA	MA	A1	1:1000

Drawing Number: **11894_DA004**

Issue: **P8**

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3 Environmental Management Framework

3.1 Roles and Responsibilities

The key personnel responsible for environmental management during project construction are listed in **Table 5**.

Table 5 Personnel Responsible for Environmental Management

Role	Responsibilities
Project Manager	• Overall responsibility for environmental management and compliance with DA Conditions and relevant legislation; • Oversee the implementation of this CEMP and request adequate resources to enable implementation of this CEMP; • Coordinate environmental inspections and reporting and authority liaisons; • Record, notify, investigate and respond to any environmental incidents and, where necessary, develop and implement corrective actions; • Be the primary daily contact to the public handling of enquiries / complaints management / interface issues; • Be available for contact by local residents and the community at all reasonable times to answer any questions; • Direct reasonable steps to be taken to avoid or minimise any unintended or adverse environmental impacts, and, failing the effectiveness of such steps, direct that the relevant actions cease immediately should an adverse impact on the environment be likely to occur; and • Provide adequate environmental inductions/training to employees and contractors regarding their requirements under this CEMP.
Site Manager	• Ensure the legislative and corporate safety, health and environment management measures and controls are implemented and maintained; • Participate in risk and hazard identification and control; • Participate in incident investigations and management; and • Participate in health and safety inspections.
All employees and contractors	• Ensure familiarity, implementation and compliance with this CEMP and appended management plans; • Support ALTIS's commitment to sustainability, environmental management and compliance; • Work in a manner that will not harm the environment or impact on surrounding receptors; • Report all environmental incidents and complaints to the Project Manager without delay; and • Report any inappropriate construction practices and/or environmental management practices to the Project Manager without delay.

3.2 Statutory Requirements

Site and development specific conditions of consent will be provided by DPIE upon approval of the project. The conditions relevant to the construction of the Project shall form part of this section in a revised, post consent CEMP for the project.

Table 6 outlines general and generic statutory requirements for environmental performance and management to be fulfilled during the construction of the Project.

Table 6 Statutory Requirements for Environmental Performance and Management

Statutory Requirement	Relevance to this Report
National Parks and Wildlife Act 1974 (NP&W Act)	
Pursuant to Clause 86 of the NP&W Act, a person must not harm or desecrate an object that the person knows is an Aboriginal object. Work associated with the project will cease immediately in the instance that any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations. Where an Aboriginal object is uncovered, the Office of Environment and Heritage will be notified, in accordance with Clause 89A of the NP&W Act.	**Section 4.6.1**
Heritage Act 1977	
Pursuant to Clause 146 of the Heritage Act 1977, if in the course of works the proponent is aware or believes that they have discovered or located a relic, notification must be made to the Heritage Council of the location of the relic, within a reasonable time after the discovery.	**Section 4.6.2**
Protection of the Environment Operations Act 1997 (PEO Act)	
Clause 148 of the PEO Act outlines pollution incidents causing or threatening material harm requiring notification to the EPA.	**Section 3.4.3**

3.3 Inductions and Environmental Training

The Project Manager will ensure that all employees and contractors involved in the construction of the Project are appropriately inducted and trained prior to commencing work on site. Training in relation to environmental responsibilities and implementation of this CEMP will take place initially through the site induction training and then on an ongoing basis through 'toolbox talks' (or similar).

The environmental induction training will cover all elements of the CEMP and will include, as a minimum, the following:

- Purpose and objectives of the CEMP;
- Requirements of due diligence and duty of care;
- Conditions of any environmental licences, permits and approvals;
- Potential environmental emergencies on site and the emergency response procedures, locations and training in the use of emergency spill kits for spills on water and on land;
- Reporting, notification and management requirements for pollution, contamination and other environmental incidents, and for damage and maintenance to environmental controls;

- High-risk activities and associated environmental safeguards i.e. earthworks, vegetation clearing, night works, operation and maintenance of concrete washouts, and washing, refuelling and maintenance of plant and equipment;
- Working in or near environmentally sensitive areas; and
- Site-specific issues including:
  - Erosion and sediment controls, water quality controls and sediment basin management (see **Section 4.4**);
  - Responsibilities under the *National Parks and Wildlife Act 1974*, including the need to cease work immediately and report any object of potential Aboriginal heritage unearthed during clearing, grubbing and earthworks operations (see **Section 4.6.1**);
  - Responsibilities under the *Heritage Act 1977* if an object of potential non-Aboriginal heritage is uncovered during construction (see **Section 4.6.2**);
  - Noise, vibration and air quality management controls (see **Sections 4.3**);
  - Requirement to maintain surrounding property access for residences and businesses and to minimise disruptions to these properties for the duration of construction;
  - Location of reuse bins, washing, refuelling and maintenance of vehicles, plant and equipment;
  - Identification, reporting and management of contaminated land (see **Section 4.9**); and
  - Incident management processes (see **Section 3.4**).

Toolbox talks will be held to identify environmental issues and controls when works commence in a new area of the site or a new activity, as well as when environmental issues arise on site. The toolbox talk will include but not be limited to:

- A description of the activity and the area;
- Identification of the environmental issues and risks for the area; and
- Outline the mitigations measures for the works and the area (see **Section 4**).

All employees conducting environmental training and site staff assigning work activities will demonstrate that they are competent and appropriately trained to train and manage construction site specific environmental issues.

A register of all environmental training carried out, including dates, names of persons trained and trainer name and qualification details will be established and maintained for the duration of works.

3.4 Incident and Non-Compliance Response and Handling Procedure

For the purposes of this CEMP, an 'incident' is described as "*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*". And a 'non-compliance' as "*an occurrence, set of circumstances or development that is a breach of the consent*".

3.4.1 Performance Objective

To ensure that any incident and/or non-compliance caused by or relating to the construction of the Project is effectively responded to, and any resulting adverse environment and/or human health impact is promptly prevented or effectively managed.

3.4.2 Responsibility

The Project Manager is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an incident and/or non-compliance. All employees, contractors and subcontractors are to:

- Notify the Project Manager of any hazard or potential hazard that may result in an incident and/or non-compliance, regardless of the nature or scale; and
- Take immediate action (where it is safe to do so) to prevent, stop, contain and/or minimise any adverse impact associated with an incident and/or non-compliance.

The induction and toolbox talks outlined in **Section 3.3** will be used to ensure all site employees, contractors and subcontractors are aware of and understand their obligations for incident and/or non-compliance response.

3.4.3 Notification Requirements

3.4.3.1 Incidents

Section 147 of the *Protection of the Environment Operations Act 1997* (POEO Act) defines material harm as:

(a) harm to the environment is material if:

(i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000 (or such other amount as is prescribed by the regulations), and

(b) 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.

Notification responsibilities for incidents that have caused or threaten to cause material harm to the environment are detailed in Section 148 of the POEO Act. In summary, these are broadly categorised as:

Duty of an employee or any person undertaking an activity:

Any person engaged as an employee or undertaking an activity with regard to the Project will, immediately after becoming aware of any potential incident (even if outside of normal business hours), notify the Project Manager of the incident and all relevant information about it. The Project Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works.

Duty of an employer or occupier of the premises to notify:

The employer or occupier of the premises (in this case, the Project Manager) on which the incident occurred, who is notified (or otherwise becomes aware of) of the incident, will immediately notify the relevant authorities about the incident and all relevant information.

Under the POEO Act, "relevant authority" means any of the following:

- The appropriate regulatory authority – the Environment Protection Authority (EPA);
- If the EPA is not the appropriate regulatory authority – the local authority for the area in which the pollution incident occurs (i.e. Council);
- NSW Public Health Unit;
- SafeWork NSW; and
- Fire and Rescue NSW.

Table 7 lists the contact details for these authorities. The person reporting the pollution incident will provide the following key details:

- Location of the pollution incident/emergency;
- Nature of the pollution incident/emergency;
- Their name and contact details; and
- Details of any required assistance.

Table 7 Regulatory Authority Contact List

Regulatory Authority / Stakeholder	Key Contact	Contact Details	
		https://www.planningportal.nsw.gov.au/major-projects/services/complaint-form	
Environment Protection Authority (EPA)	Environment Line	131 555 info@environment.nsw.gov.au	
	Head office (Sydney)	02 9995 5000	
Penrith City Council	Main switchboard	02 4732 7777 council@penrith.city	
NSW Public Health Unit	Sydney Local Health District	Business hours: 1300 066 055 After hours: 02 9515 6111	
SafeWork NSW	Incident Notification Hotline	131 050 Select Option 3 to report a "Serious Incident or Fatality" – this will result in the incident being recorded and the appropriate person being contacted.	
Emergency Services	NSW Police NSW Fire and Rescue NSW Ambulance Service	131 444 1300 729 579 -	In case of emergency – 000

3.4.4 Incidents and Non-Compliance Handling Procedure

Upon becoming aware of an incident and/or non-compliance, the procedure outlined below will be followed.

1. Preventative Action

Where possible and safe to do so, immediate action will be taken to prevent, stop, contain and/or minimise the environmental impact of the incident and/or non-compliance.

In the unlikely event that an incident and/or non-compliance requires the evacuation of the site, actions will be completed in accordance with evacuation procedures. All employees and contractors are to be made aware of the location of emergency assembly areas through site inductions, signage and regular toolbox talks.

2. Assistance

If adequate internal resources are not available and the incident and/or non-compliance threatens public health, property or the environment, it is essential that Fire and Rescue NSW be contacted by telephoning "000" for emergency assistance.

Contacting Fire and Rescue NSW does not negate the notification requirements in **Section 3.4.3**.

3. Notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. The specific duties to notify are outlined above in **Section 3.4.3**.

In the event of a serious incident or emergency, it is more than likely that Fire and Rescue NSW will take control and manage the required investigation and remedial activities. Any instructions issued will be strictly adhered to.

4. Investigate

Undertake immediate investigative work to determine the cause of the incident and/or non-compliance.

5. Remedial Action

Undertake appropriate remedial action to address the cause of the incident and/or non-compliance and mitigate any further environmental impact. In some instances, outside resources such as specialist contractors/consultants may be required.

6. Record

It is imperative that an honest assessment of the situation is carried out and documented to minimise the potential for similar events in the future. On this basis, every incident is to be recorded in an Incident Report. A copy of the completed report will be maintained for at least five years by ALTIS.

7. Preventative Action

Once the incident and/or non-compliance has been suitably handled, appropriate measures will be identified and implemented to reduce the possibility of re-occurrence.

3.4.5 Incidents and Non-Compliance Register

An Incidents and Non-Compliance Register will be maintained during construction and will contain the following:

- A copy of the environmental incident and non-compliance notification requirements and handling procedure contained above in **Section 3.5.3** and **3.5.4**;
- Site evacuation procedures;
- A separate reference sheet containing the contact details for the contacts listed in **Table 4** and the contact details for the regulatory authorities listed in **Table 7**;
- Blank hard copies of the Incident Report; and
- Copies of all completed Incident Report which are to be maintained for at least five years after the event to which they relate.

3.4.6 Minor Environmental Incidents

There is the possibility of minor environmental incidents occurring as part of this project. SLR have defined a 'Minor Environmental Incident' as an incident where there has been no potential or actual material harm to the environment (see 'material harm' definition outlined in **Section 3.5.3**). Examples may include excessive dust impacts sighted by the project team or a small contained hydrocarbon spill that does not leave a site boundary and is cleaned up without residual on-site environmental harm.

Minor environmental incidents will still be handled under the process outlined in **Section 3.4.4** except there will be no requirement for government notification. All minor or major incidents will be recorded in the Incidents and Non-Compliance Register.

3.5 Complaints Response and Handling Procedure

3.5.1 Performance Objective

To ensure that all environmental complaints in relation to the construction of the Project are promptly and effectively received, handled and addressed.

3.5.2 Responsibility

The Project Manager is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental complaint. The induction and toolbox talks outlined in **Section 3.3** will be used to ensure all site employees are aware of and understand their obligations for complaints response.

All employees who take receipt of a complaint, either verbal or written, are to immediately notify the Project Manager.

3.5.3 Complaints Handling Procedure

Upon becoming aware of a complaint, the protocol outlined below will be followed.

1. Record and Acknowledge

Any employee who takes receipt of a complaint, either verbal or written, are to immediately notify the Project Manager. The Project Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works. All relevant contact details are available in **Table 4**.

In the normal course of events, the first contact for complaints will usually be made in person or by telephone. The complainant's name, address and contact details, along with the nature of the complaint, will be requested. If the complainant refuses to supply the requested information, a note will be made on the form and complainant advised of this.

2. Assess and Prioritise

The Project Manager will prioritise all complaints by considering the seriousness of the complaint including risk to health and safety and will attempt to provide an immediate response via phone or email.

3. Investigate

A field investigation will be initiated in an attempt to confirm details relevant to the complaint and the cause of the problem. Any monitoring information and/or records at and around the time of the complaint will be reviewed for any abnormality or incident that may have resulted in the complaint.

If the complaint is due to an incident, the notification requirements and handling procedures outlined in **Section 3.4.3** and **3.4.4** respectively will be followed.

4. Action or Rectify

Once the cause of the complaint has been established, every possible effort will be made to undertake appropriate action to rectify the cause of the complaint and mitigate any further impact. The Project Manager will assess whether the complaint is founded or unfounded and delegate the remediation, as required.

5. Respond to Complainant

The Project Manager will oversee the rectification of the issue and respond to the complainant once the issue has been resolved. The complainant will be provided with a follow up verbal response on what action is proposed within 24 hours. Where a complaint cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant within ten days.

6. Record

It is imperative that an assessment of the situation is carried out and documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded in the Complaints Register. A copy of the Complaints Register will be maintained for at least five years.

7. Preventative Action

Once the complaint has been suitably handled, appropriate measures will be identified and implemented to negate the possibility of re-occurrence. The Complaints Register is not finalised until the preventative actions are completed and recorded on the form.

3.5.4 Complaints Register

The Complaints Register will be updated and maintained onsite during construction with a copy of the following:

- The environmental complaint handling procedure contained in **Section 3.5**;
- A separate reference sheet containing the contact details listed in **Table 4**; and
- Hard copies of ALTIS's Complaints Register which is to be maintained for at least five years after the event to which it relates.

3.6 Dispute Resolution

In the case of a dispute between Altis and a community member/complainant, either party may refer the matter to the relevant regulatory authority for consideration, advice and/or negotiation. If the matter escalates, a third-party mediator may be required.

4 Environmental Management Commitments

Environmental aspects with the potential to be impacted through the construction of the Project are addressed in the following sub-sections. These issues are considered to have the highest potential to result in a non-compliance with a legislative requirement or generate community complaints. The tables in this section are a compliance management tool outlining how controls are to be implemented.

4.1 General

Table 8 lists the general environmental controls that will be implemented throughout the construction of the Project to minimise the potential for adverse impacts on the local environmental and surrounding receptors.

Table 8 General Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
All reasonable and feasible measures will be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from construction.	Altis' Appointed Contractor	Ongoing
All licences, permits, approvals and consents will be obtained and maintained as required for the development.		Prior to commencing construction and ongoing
Altis' Appointed Contractor will obtain relevant approvals from service providers before the construction of any utility works.		Prior to commencing construction
All plant and equipment will be maintained in a proper and efficient condition, and operated in a proper and efficient manner.		Ongoing
The incidents and complaints management strategies contained within **Sections 3.5** and **3.6** will be implemented to ensure that any incidents and/or complaints relating to the construction activities are promptly and effectively addressed.		Ongoing
Construction employees and contractors will be suitably inducted and trained prior to commencing any work on site.		Prior to commencing construction and ongoing

4.2 Noise and Vibration

The environmental management controls in **Table 9** will be implemented to minimise the potential for adverse noise and vibration emissions from the construction of the Project.

Table 9 Noise and Vibration Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
Construction will only be undertaken during the hours specified in the Development Consent	Altis' Appointed Contractor	Ongoing
The Project will be constructed to achieve the construction noise management levels detailed in the *Interim Construction Noise Guideline* (Department of Environment and Climate Change 2009) (as may be updated or replaced from time to time).		
All feasible and reasonable noise mitigation measures will be implemented and any activities that could exceed the construction noise management levels will be identified and managed.		
Vibration will comply with the latest version of *DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures* (German Institute for Standardisation 1999).		
Project Planning		
Where possible, alternative less noise and vibration intensive construction techniques will be used, as opposed to rock breaking and concrete sawing.	Altis' Appointed Contractor	Ongoing
Power tools will use battery or mains power rather than using generators.		
Works will be completed during standard daytime construction hours.		
Truck routes to site will be limited to major roads.		
Scheduling		
Respite offers will be considered where high noise and vibration generating activities are near receivers. As a guide, work will be carried out in blocks that do not exceed three hours, with a minimum respite period of one hour between each block.	Altis' Appointed Contractor	As required
Affected community will be consulted to determine the need for respite periods, where appropriate.		
Site Layout		
Site entry and exit points will be located as far as possible from sensitive receivers.	Altis' Appointed Contractor	Ongoing
Compounds and worksites will be designed to promote one-way traffic and minimise the need for vehicle reversing.		
Work compounds, parking areas, and equipment and material stockpiles will be positioned away from noise-sensitive locations.		
Training		
Training will be provided to all personnel on noise and vibration requirements for the project. Inductions and toolbox talks to be used to inform personnel of the location and sensitivity of surrounding receivers.	Altis' Appointed Contractor	Ongoing

Environmental Management Control	Responsibility	Timing / Frequency
Screening		
Purpose-built screening or enclosures will be installed around long-term fixed plant that has the potential to impact nearby receivers, where possible.	Altis' Appointed Contractor	As required
Site layout will take advantage of existing screening from local topography, where possible. Site huts, maintenance sheds and/or shipping containers will be positioned between noisy equipment and the affected receivers.		
Community Consultation		
Notifications will be provided to the affected community where high impacts are anticipated or where out of hours works are required.	Altis' Appointed Contractor	Five days prior to commencing
Where complaints are received, the work practices will be reviewed, and feasible/reasonable mitigation and management measures implemented to minimise any further impacts.		Following a complaint
Vibration		
Where vibration generating works are within the minimum working distances for cosmetic damage and considered likely to exceed the criteria, different construction methods with lower source vibration levels will be investigated and implemented, where feasible.	Altis' Appointed Contractor	Ongoing
Where vibration generating works are within the minimum working distances for cosmetic damage and considered likely to exceed the criteria, attended vibration measurements will be undertaken to determine actual vibration levels at the item. Works will cease if the monitoring indicates vibration levels are likely to, or do, exceed the relevant criteria.		Prior to commencing vibration generating works
Where vibration intensive works are required within the cosmetic damage minimum working distances, building condition surveys will be completed before and after the works to ensure no cosmetic damage has occurred.		Before and after vibration generating works

4.3 Traffic

The environmental management controls in **Table 10** will be implemented to ensure road safety and network efficiency during construction.

Table 10 Traffic Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
Heavy vehicles and bins will not be parked on local roads or public verges in the vicinity of the site.	Altis' Appointed Contractor	Ongoing
Entry and exit driveways of the site will be identified through signposting and line markings.		
All trucks entering or leaving the site will do so in a forward direction and have their loads covered and will not track dirt onto the public road network.		Ongoing
Vehicles will be scheduled in such a manner as to not require queuing or parking on the road network surrounding the site.		
All vehicles will be wholly contained on site before being required to stop.		
All loading and unloading of materials will be carried out on-site within the designated loading/unloading areas and will not obstruct vehicle movements within the site.		
All vehicles will access the site via approved routes only.		
All drivers will follow the drivers code of conduct.		
Site workers and contractors will park within the site compound.		
Surrounding public transport access will be unaffected during construction.		
All plant will be located within site compound.		
There will be enough parking available for staff and contractors within the site.		
All equipment, materials and waste will be stored within the site compound.	Altis' Appointed Contractor	Ongoing
Existing residential driveways and access points will be maintained.		
Pedestrian access to be maintained during footpath work via traffic controllers onsite to manage activity as required. Site vehicles are to wait for a suitable gap in both pedestrian and vehicular traffic before proceeding to minimise impact to existing traffic flow.		
Priority will be given to emergency vehicles, as per normal procedure.		
Construction traffic to be scheduled as per ANZS12 outside of peak times to minimise impact to existing traffic increases.		

4.4 Soil and Water

The environmental management controls are summarised in **Table 11** shall be implemented to ensure good outcomes for soil and water quality.

Table 11 Soil and Water Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
Dam dewatering will be undertaken in accordance with *Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book* (Landcom 2004)	Altis' Appointed Contractor	Ongoing
Prior to commencing dewatering of existing onsite dams, a suitably qualified ecologist will conduct a survey of the dams for aquatic species present and arrange their relocation if required.		Immediately prior to commencing dam dewatering
Only Virgin Excavated Natural Material (VENM), Excavated Natural Material (ENM), or other material approved in writing by EPA will be brought onto the site.		Ongoing
Accurate records of the volume and type of fill used will be kept and made available to the regulator upon request.		
Suitable erosion and sediment control measures will be installed and maintained on-site, in accordance with the relevant requirements of the *Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book* (Landcom 2004) guideline.		Prior to commencing construction and ongoing
No stockpiles will be located within 20 m of a water body or riparian corridor		Ongoing
Altis' Appointed Contractor will comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.		
Silt fences and silt fence returns will be erected convex to the contour to pond water.		
Hay bale barriers and geofabric fences will be constructed to toe of batter.		Prior to commencing construction and ongoing
All temporary earth berms, diversion and silt dam embankments will be machine compacted, seeded and mulched for temporary vegetation cover as soon as they have been formed.		Prior to commencing earthworks, immediately after vegetation clearing and before topsoil removal
Clean water will be diverted away from disturbed ground and into the drainage system.		Ongoing
Altis' Appointed Contractor will maintain and provide ongoing adjustment to erosion control measure, as required, during construction.	Altis' Appointed Contractor	Ongoing
All sediment trapping structures and devices will be inspected after storms or high rainfall (>20mm) for structural damage or clogging, trapped material will be removed to a safe, approved location.		

Environmental Management Control	Responsibility	Timing / Frequency
All final erosion prevention measures including the establishment of grassing will be maintained until the end of the defects liability period.		Following extreme rainfall events
All earthworks areas will be rolled on a regular basis to seal the earthworks.		Ongoing
All fill areas will be left with a bund at the top of the slope at the end of each day's earthworks. The height of the bund will be a minimum of 200 mm		
All cut and fill slopes will be seeded and hydromulched.		
All temporary work such as silt fence, diversion drains etc. will be removed after revegetation of the site is complete and the site is stable, in the opinion of a suitably qualified person.		Within 10 days of completion of formation
All topsoil stockpiles will be suitably covered to prevent wind and water erosion.		Ongoing
Any area that is not approved by the contract administrator for clearing or disturbance will be clearly marked and sign posted, fenced off or otherwise appropriately protected against any such disturbance.		
All stockpile sites will be situated in areas approved for use. A 6m buffer zone will exist between stockpile sites and any stream or flow path. All stockpiles will be adequately protected from erosion and contamination of the surrounding area in accordance with the Erosion Sediment Control Plan (ESCP).		Prior to commencing construction and ongoing
Access and exit areas will include shake down, or other approved methods, for the removal of soil materials from motor vehicles.		Ongoing
Altis' Appointed Contractor will ensure runoff from all areas where the natural surface is disturbed by construction will be free of pollutants before it is either dispersed to stable areas or directed to natural watercourses.		
Altis' Appointed Contractor will provide and maintain slopes, crowns and drains on all excavations and embankments to ensure satisfactory drainage at all times. Water will not be allowed to pond on the works unless such ponding is part of an approved ESCP.		
Runoff collected in the sedimentation basins will be assessed by a qualified laboratory for dousing rates of alum or gypsum to ensure coagulation of sediments prior to water being discharged to Councils stormwater system.	Altis' Appointed Contractor	Ongoing
Each sedimentation basin will have a marker placed as per the detail to indicate when sediment should be removed.		Following extreme rainfall events
Sediment removed from a basin is to be classed and dewatered prior to removal from site.		Ongoing

4.5 Air Quality

The environmental controls in **Table 12** will be implemented to minimise the potential for adverse air emissions and impacts during the construction.

Table 12 Air Quality Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
All reasonable steps will be taken to minimise dust generated during construction.	Altis' Appointed Contractor	Ongoing
Exposed surfaces and stockpiles will be suppressed by regular watering.		
All trucks entering or leaving the site will have their loads covered.		
Trucks will not track dirt onto the public road network.		
Public roads used by construction trucks will be kept clean.		
Land stabilization works will be carried out progressively on site to minimise exposed surfaces.		
All equipment will be installed and operated in line with best practice.		
Construction will not cause or emit any offensive odour (as defined in the POEO Act).		

4.6 Heritage

4.6.1 Aboriginal Heritage

If any item or object of Aboriginal heritage significance is identified on site:

- All work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;
- A 10 m wide buffer area around the suspected item or object must be cordoned off; and
- Heritage NSW must be contacted immediately.

Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the *National Parks and Wildlife Act 1974.*

4.6.2 European Heritage

If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded and, if necessary, excavated by a suitably qualified and experienced expert in accordance with the requirements of Heritage NSW.

4.7 Landscaping and Visual Amenity

Table 13 outlines the mitigation measures to be implemented during construction to manage any potential impacts to landscaping and visual amenity.

Table 13 Landscaping and Visual Amenity Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
No clearing of native vegetation will be undertaken.	Altis' Appointed Contractor	Ongoing
Lighting will comply with the latest version of *AS 4282-2019 - Control of Obtrusive Effects of Outdoor Lighting.*		
Lighting will be mounted, screened and directed so that it does not create a nuisance to surrounding properties or the public road network.		

4.8 Waste

Table 14 lists the environmental controls that will be implemented to minimise the potential for adverse impacts as a result of waste generated during the construction of the Project.

Table 14 Waste Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
Suitable measures will be implemented to manage pests, vermin and declared priority weeds.	Altis' Appointed Contractor	Ongoing
The site will be inspected on a regular basis to ensure that these measures are working effectively, and that pests, vermin or priority weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.		
Waste will be secured and maintained within designated waste storage areas at all times and will not leave the site onto neighbouring public or private properties.		
All waste materials removed from the site will only be directed to a waste management facility or premises lawfully permitted to accept the materials.		
All liquid and non-liquid wastes will be assessed and classified to be taken off site in accordance with the latest version of EPA's *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.		Prior to removing waste from site
Waste generated outside the site will not be received at the site for storage, treatment, processing, reprocessing, or disposal.		Ongoing
No waste will be buried on site.		

Environmental Management Control	Responsibility	Timing / Frequency
A Waste Management Register will be recorded and maintained, and will include: • Type of waste and its classification (according to the POEO Act and Waste Classification Guidelines); • Quantities of waste, measured in tonnes; • How and where the waste was reused, recycled, stockpiled or disposed of; • Date when the waste was reused, recycled, stockpiled or disposed of; and • Name and waste transport licence (if applicable) of the transporter used.		

4.9 Hazardous Goods and Contamination

The environmental controls that will be implemented to minimise the potential for environmental incidents relating to the hazardous goods and emergency are presented in **Table 15**.

Table 15 Hazardous Goods and Contamination Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
Dangerous goods will be stored and handled strictly in accordance with all relevant Australian Standards and the *Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin* (EPA 1997).	Altis' Appointed Contractor	Ongoing
All chemicals, fuels and oils used on-site will be stored in appropriately bunded areas in accordance with all relevant Australian Standards, and/or EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual* (Department of Environment and Climate Change, 2007).		
The Project Manager will be notified of any suspected or potential contamination exposed during construction activities and cease all work activities within the vicinity of actual or suspected contaminated land.	Employees / Contractors	Immediately
Emergency spill kits will be kept on site at all points of transfer for fuels and hydrocarbons, and at all other locations deemed necessary.	Altis' Appointed Contractor	Ongoing
Safety Data Sheets (SDS) will be kept in the Site office and/or safety system for any potentially hazardous goods stored and/or used on site.		
The actions specified on the respective SDS will be implemented in the event of a minor chemical or fuel spill.		
All employees and contractors required to use potentially dangerous goods will be appropriate trained in the proper storage, use and handling.		Prior to commencing construction

4.10 Bushfire

The environmental controls that will be implemented to minimise the potential for environmental incidents relating to bushfire and are presented in **Table 16**.

Table 16 Bushfire and Emergency Construction Environmental Management Controls

Environmental Management Control	Responsibility	Timing / Frequency
Construction will comply with the recommendations outlined in Section 5 of the *Bushfire Assessment 'Proposed Industrial Subdivision 884-928 Mamre Road, Kemps Creek"* prepared by Peterson Bushfire, dated 28 September 2020.	Altis' Appointed Contractor	Ongoing
Staff will be familiar with the access routes should an evacuation be necessary.		
The warehouse site is to have a defendable space between the building and the site boundary including the following: (a) A minimum 6.5 m wide carriageway fire access road located between the warehouse and the boundary. (b) Continuous thoroughfare for fire pumpers between the warehouse and site boundary linking back to the internal access road. (c) The defendable space is to be clear of vegetation.		
Vegetation and landscaping will comply with the performance objectives of an Inner Protection Area (IPA) standard as described by the NSW Rural Fire Service (RFS) document *Planning for Bush Fire Protection 2006* (NSWRFS 2006).		
Fire hydrants will be installed to comply with *AS 2419.1 – 2005 Fire Hydrant Installations - System Design, Installation and Commissioning* (AS 2419) so that all sides of a building envelope are within 70 m of a hydrant by lay of the hose (or 90 m with a tanker parked in-line maximum 20 m from the hydrant).		
Any gas services will be installed and maintained in accordance with *AS/NZS 1596-2014 The storage and handling of LP gas*.		

5 Monitoring and Reporting

5.1 Environmental Monitoring and Inspections

Table 17 summarises the monitoring requirements for the construction of the Project.

Table 17 Monitoring and Inspection Requirements

Environmental Management Control	Responsibility	Timing / Frequency
General environmental inspections will be undertaken.	Altis' Appointed Contractor	Weekly
Meteorological data including rainfall will be monitored.		Daily
Where vibration generating works are within the minimum working distances for cosmetic damage and considered likely to exceed the criteria, attended vibration measurements will be undertaken to determine actual vibration levels at the item. Works will cease if the monitoring indicates vibration levels are likely to, or do, exceed the relevant criteria.	Altis' Appointed Contractor	Prior to commencing vibration generating works
Where vibration intensive works are required within the cosmetic damage minimum working distances, building condition surveys will be completed before and after the works to ensure no cosmetic damage has occurred.		Before and after vibration generating works
Noise and/or vibration monitoring will be undertaken in response to any formal complaint to verify that levels are not substantially above the predicted levels, if required. The monitoring will take place during the expected noisiest construction periods and be representative / indicative of any impact across all potentially affected sensitive receivers.		Following a complaint
All sediment trapping structures and devices will be inspected after storms or high rainfall (>20mm) for structural damage or clogging, trapped material will be removed to a safe, approved location.	Altis' Appointed Contractor	Following extreme rainfall events
Runoff collected in the sedimentation basins will be assessed by a qualified laboratory for dousing rates of alum or gypsum to ensure coagulation of sediments prior to water being discharged to Councils stormwater system.		
The site will be inspected on a regular basis to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.	Altis' Appointed Contractor	Ongoing

5.2 Reporting

Table 18 summarises the reporting requirements for the construction of the Project.

Table 18 Reporting Requirements

Reporting Requirement	Responsibility	Timing / Frequency
General		
Once becoming aware of an incident, Altis' Appointed Contractor will notify the relevant agency if an incident, or potential incident, causes (or may cause) harm to the environment.	Altis' Appointed Contractor	Immediately (within 24 hours)
A register of all complaints, incidents and non-compliances will be kept.		For at least 5 years after completion
Altis' Appointed Contractor will record environmental performance during regular management meetings and/or 'toolbox talks'. Items to be discussed include: • Results of any monitoring activities undertaken; • Any environmental incidents that have occurred during the previous period, including the management / corrective actions taken; • Any complaints that have been received during the previous period, including any management / corrective actions taken.		Weekly
A copy of all environmental records will be maintained, including: • Site environmental inspection reports • Environmental monitoring data • Internal and external audit reports • Reports of environmental incidents, environmental, associated actions taken, and follow-up actions • Minutes of management review meetings • Induction and training records		For at least 5 years after completion
Noise and Vibration		
Notifications will be provided to the affected community where high impacts are anticipated or where out of hours works are required.	Altis' Appointed Contractor	Five days prior to commencing

Reporting Requirement	Responsibility	Timing / Frequency
Waste		
A Waste Management Register will be recorded and maintained, and will include: • Type of waste and its classification (according to the POEO Act and Waste Classification Guidelines); • Quantities of waste, measured in tonnes; • How and where the waste was reused, recycled, stockpiled or disposed of; • Date when the waste was reused, recycled, stockpiled or disposed of; and • Name and waste transport licence (if applicable) of the transporter used.	Altis' Appointed Contractor	Ongoing
Hazardous Goods and Contamination		
The Project Manager will be notified of any suspected or potential contamination exposed during construction activities and cease all work activities within the vicinity of actual or suspected contaminated land.	Employees / Contractors	Immediately

5.3 Audits

Table 19 summarises the Audit requirements for the construction of the Project.

Table 19 Audit Requirements

Reporting Requirement	Responsibility	Timing / Frequency
A project audit will be undertaken to ensure all aspects of the CEMP are implemented.	Altis' Appointed Contractor	Monthly

5.4 Contingency Management Plan

Table 20 lists the actions to be implemented if inspections, monitoring and/or auditing indicate that the mitigation measures listed in **Section 4** and the specialist management plans are not effective in managing environmental impacts.

All Condition Amber and Condition Red occurrences will be recorded and discussed during the toolbox talks.

Table 20 Contingency Plan

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Noise impacts at sensitive receiver locations	Trigger	Noise levels do not exceed applicable Noise Management Levels (NMLs).	Noise levels exceed applicable NMLs.	Noise levels exceed Highly Noise Affected criteria (75 dBA).
	Response	Ongoing best practice management measures to minimise noise emissions.	Undertake all feasible and reasonable mitigation and management measures to minimise noise impacts.	Undertake all feasible and reasonable mitigation and management measures to ensure noise levels are below Highly Noise Affected criteria. If noise levels cannot be kept below applicable limits, then a different construction method or equipment will be utilised.
Vibration impacts at sensitive receiver locations	Trigger	Vibration intensive works undertaken outside minimum working distance for the specific equipment in use.	Vibration intensive works undertaken within minimum working distance for the specific equipment in use.	Vibration levels exceed applicable vibration limits.
	Response	Ongoing best practice management measures to minimise vibration emissions.	Undertake vibration monitoring for the duration of the works to confirm vibration levels.	Stop work. Undertake all feasible and reasonable mitigation and management measures to ensure vibration levels are below applicable limits. If vibration levels cannot be kept below applicable limits then a different construction method or equipment will be utilised.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Visible dust leaving the site	Trigger	Daily inspections show that there is no visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site multiple times during a day OR from multiple locations within the site.
	Response	Continue monitoring program as normal.	Review and investigate construction activities and respective control measures, where appropriate. Implement additional remedial measures, such as deploying additional water sprays, water trucks etc.	Undertake an investigation of the dust generating activities, and if necessary, temporarily halt the dust generating activities.
Queuing	Trigger	No queuing identified.	Queuing identified within site.	Queuing identified on the public road.
	Response	No response required. Continue monitoring program.	Review the delivery schedule prepared by the builder. If drivers are not following the correct schedule, then they should be provided with additional training and an extra copy of the Driver Code of Conduct.	Review and investigate construction activities. If it is concluded that construction activities were directly responsible for the exceedance, implement remediation measures such as: • Temporary halting of activities and resuming when conditions have improved. • Stop all transportation into and out of the site. • Provide additional training.
Erosion	Trigger	No evidence of erosion.	Minor gully or tunnel erosions present and/or rilling. Evidence of sediment or sediment laden water leaving the site.	Significant gully or tunnel erosions present and/or rilling. Evidence of sediment or sediment laden water leaving the site.
	Response	Continue CEMP implementation.	A suitably trained person to inspect the site. Review of erosions and sediment structures. Remediate as appropriate.	A suitably trained person to inspect the site. Review of erosion and sediment structures. Remediate as soon as practical.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Water management structures	Trigger	Water management structures have been designed, constructed and managed in accordance with the Blue Book and the ESCP.	Inspections indicate that water management structures illustrate minor non-compliance with the Blue Book and the ESCP.	Inspections indicate a failure of the water management structures.
	Response	Continue CEMP implementation.	A suitably trained person to inspect the site. Review of water management structures. Remediate as appropriate.	A suitably trained person to inspect the site. Remediate as soon as practical. Review of engineering design and revise ESCP.
Slope failure	Trigger	No significant erosion is present that would constitute a safety hazard or compromise the capability of supporting the end land use. Monitoring verifies there are no gully or tunnel erosion features, or rill erosion >200mm deep.	Monitoring verifies there is gully or tunnel erosion features, or rill erosion 200mm deep.	Monitoring verifies there is gully or tunnel erosion features, or rill erosion >200mm deep.
	Response	No response required. Continue to monitor.	A suitably trained person to inspect the site. Investigate opportunities to install water management infrastructure to address erosion. Remediate as appropriate.	Undertake a review of the drainage of the area and provide recommendations to appropriately remediate the erosion. Remediate as soon as practicable.
Heritage	Trigger	No unknown heritage items uncovered.	Potential heritage item uncovered.	Potential heritage item uncovered causing significant delays to project.
	Response	Continue CEMP implementation.	Stop work and implement the unexpected finds protocol in **Section 4.6.**	Stop work and implement the unexpected finds protocol in **Section 4.6**. Heritage item to be salvaged and removed from site by a qualified archaeologist, if requested by Heritage NSW.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Unexpected Contamination	Trigger	No contamination uncovered during earthworks.	Areas of possible contamination uncovered.	Areas of contamination uncovered.
	Response	Continue CEMP implementation.	Stop work immediately and assess the contamination with the applicable guidelines.	Stop work immediately and engage a specialist consultant. A validation report is to be prepared following remediation.
Bushfire	Trigger	No bushfire or bushfire prone weather.	Bushfire prone weather during summer.	Bushfire in the vicinity of the site.
	Response	Continue CEMP implementation.	Ensure grass is kept short and vegetation is minimal at the site. Weather is to be monitored twice daily for chance of bushfire.	Stop work and contact NSW Fire and Rescue on '000'. Evacuate the site as directed by NSW Fire and Rescue.
Fauna	Trigger	No fauna discovered during works.	Fauna species identified.	Threatened fauna identified.
	Response	Continue CEMP implementation.	Stop work and implement the unexpected finds protocol in **Section 4.6.**	Stop work and implement the unexpected finds protocol in **Section 4.6**. Ecologist to be contacted to remove fauna and relocate to a safe habitat area.

6 Review and Improvement of the CEMP

This CEMP will be reviewed and, if necessary, revised in the following circumstances:

- Where there is any change to the scope of the construction activities and/or disturbance footprint;
- Where additional requirements arise through the imposition of conditions of consent within the Development Approval;
- Where it is identified that the environmental performance is not meeting the objectives of the CEMP; and/or
- At the request of a relevant regulatory authority.

All employees and contractors will be informed of any revisions to the CEMP by the Project Manager during toolbox talks.

7 References

Department of Environment and Climate Change (2007) *Storing and Handling of Liquids: Environmental Protection – Participants Manual*

Department of Environment and Climate Change (2009) *Interim Construction Noise Guideline*

Department of Infrastructure, Planning and Natural Resources (2004) *Guideline for the Preparation of Environmental Management Plans*

Environment Protection Authority (1997) *Environment Protection Manual for Authorised Officers: Bunding and Spill Management – technical bulletin*

Environment Protection Authority (2014) *Waste Classification Guidelines Part 1: Classifying Waste*

German Institute for Standardisation (1999) *DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures*

Landcom (2004) *Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book*

NSW Rural Fire Service (2006) *Planning for Bush Fire Protection*

Peterson Bushfire (2020) *Bushfire Assessment*

Standards Australia (2005) *AS 2419.1 – 2005 Fire Hydrant Installations - System Design, Installation and Commissioning*

Standards Australia (2014) *AS/NZS 1596-2014 The storage and handling of LP gas*

Standards Australia (2019) *AS 4282-2019 - Control of Obtrusive Effects of Outdoor Lighting*

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