



# **Main Works (Construction) Waste Management Plan – SYD091 Sydney Data Centre, 43-61 Turner Rd, Gregory Hills**

**FDC Construction (NSW) Pty Ltd**

**Report**

**69307 | 169,917 (Revision 1)**

**25 March 2026**

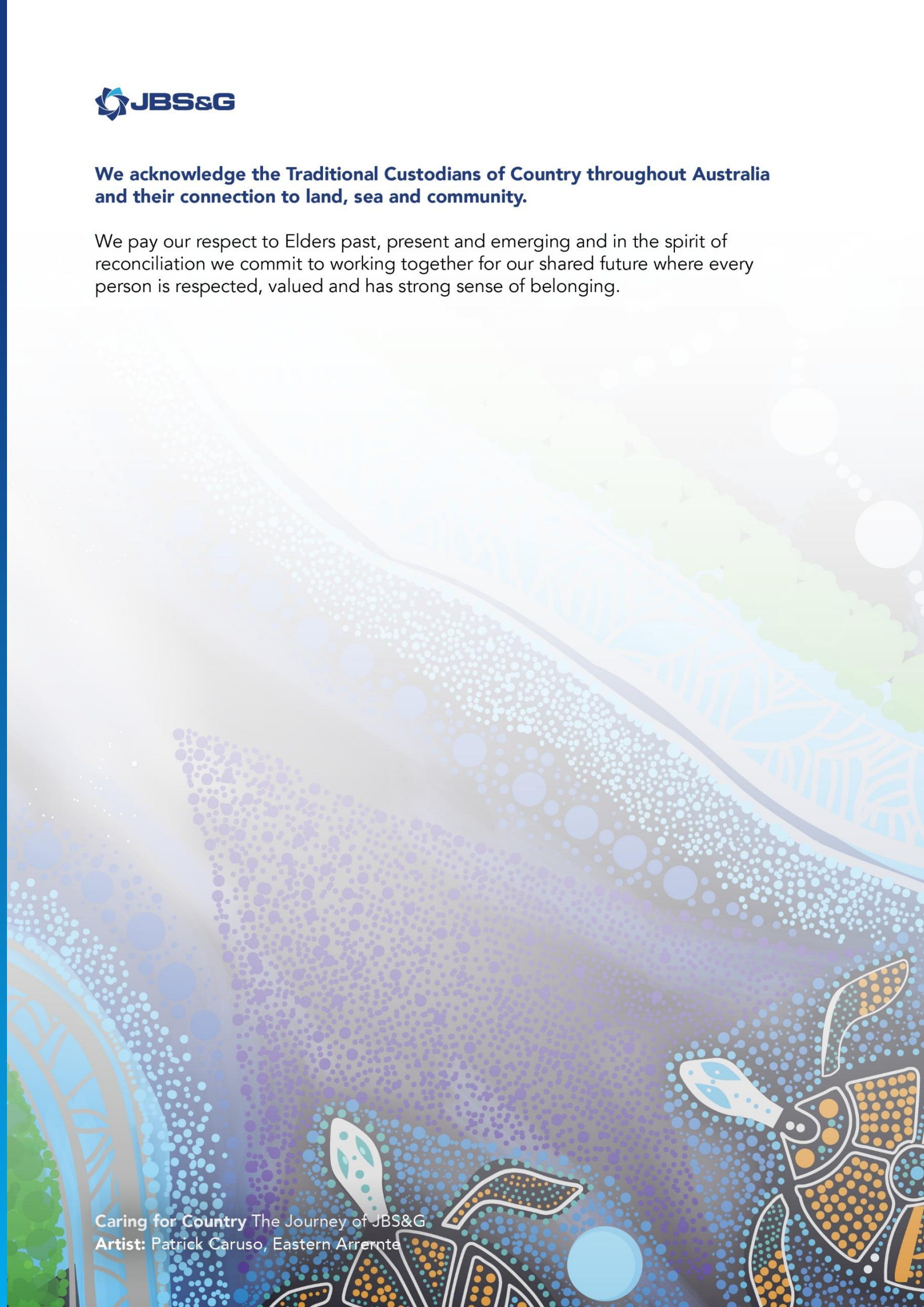




**We acknowledge the Traditional Custodians of Country throughout Australia and their connection to land, sea and community.**

We pay our respect to Elders past, present and emerging and in the spirit of reconciliation we commit to working together for our shared future where every person is respected, valued and has strong sense of belonging.

**Caring for Country** The Journey of JBS&G  
**Artist:** Patrick Caruso, Eastern Arrernte



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## Abbreviations

| Term            | Definition                                                                             |
|-----------------|----------------------------------------------------------------------------------------|
| ACM             | Asbestos Containing Material                                                           |
| BCA             | Building Code of Australia                                                             |
| Consent         | SSD Conditions of Consent                                                              |
| DCP             | Development Control Plan                                                               |
| DPHI            | Department of Planning, Housing and Infrastructure                                     |
| EPA             | NSW Environment Protection Authority                                                   |
| FDC, the Client | FDC Construction Pty Ltd                                                               |
| JBS&G           | JBS&G Australia Pty Ltd                                                                |
| LGA             | Local Government Area                                                                  |
| POEO Act        | <i>NSW Protection of the Environment Operations Act 1997</i>                           |
| SSDA            | State Significant Development Application                                              |
| WARR Act        | <i>NSW Waste Avoidance and Resource Recovery Act 2001</i>                              |
| WMP             | Waste Management Plan                                                                  |
| WSM Strategy    | <i>NSW Government Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027</i> |

# 1. Introduction

## 1.1 Project Description

JBS&G Australia Pty Ltd (JBS&G) was engaged by FDC Construction Pty Ltd (FDC, the Client) to prepare a construction Waste Management Plan (WMP) , in accordance with the State Significant Development Application (SSDA) Consent SSD-680137154 for the construction of the proposed SYD091 Main Works project, located at 43-61 Turner Road, Gregory Hills, NSW (the site). This WMP has been prepared for incorporation with Construction Environmental Management Plan (CEMP) developed for the site by FDC. The Consent enables the following works to occur:

- Construction of 12 data halls,
- A high voltage substation,
- Emergency back-up generators,
- Cooling plant, diesel and lithium-ion battery storage,
- Associated infrastructure, landscaping and earthworks.

FDC are currently delivering the SYD091 Early Works under a Camden Council DA Consent (DA/2024/616/1.). This approval enables delivery of:

- The demolition and clearance of existing structures and vegetation,
- Completion bulk earthworks and installation of retaining walls,
- Public Domain works which includes provision of HV power, stormwater installation and pavement build ups with a new access road.

In its existing state, the development has undergone dam decommissioning, site clearance, bulk earthworks, and sediment erosion and control measures implemented. Site access will be via Central Hills Drive with Predominant neighbouring properties located on this side of site. There are industrial neighbouring properties to white cliffs avenue, opposite side of Turner Road and residential area along Pioneer Street. There is a Riparian Zone located East of 61 Turner Road which will be fenced off to deter any access into this area.



**Figure 1-1: Site Aerial (source: Nearmaps)**

The SSDA approved Main Works SSD-680137154 will occur concurrently with the Early Works DA/2024/616/1. This WMP has been prepared in accordance with the consent conditions outlined in **Section 1.6**.

Effective implementation of the CEMP and its Sub-Plans will enable the Project to comply with the Consent Conditions, the mitigation measures (identified in the consent, SSD-680137154), and all relevant Acts, Regulations, Standards, and Government Policies.

This plan applies to all staff, workers, and sub-contractors involved in the construction project.

## 1.2 Staging

This development will be delivered in a single stage with the Early Works and Main Works delivered concurrently under the two development approvals previously discussed:

### DA/2024/616/1 – Early Works

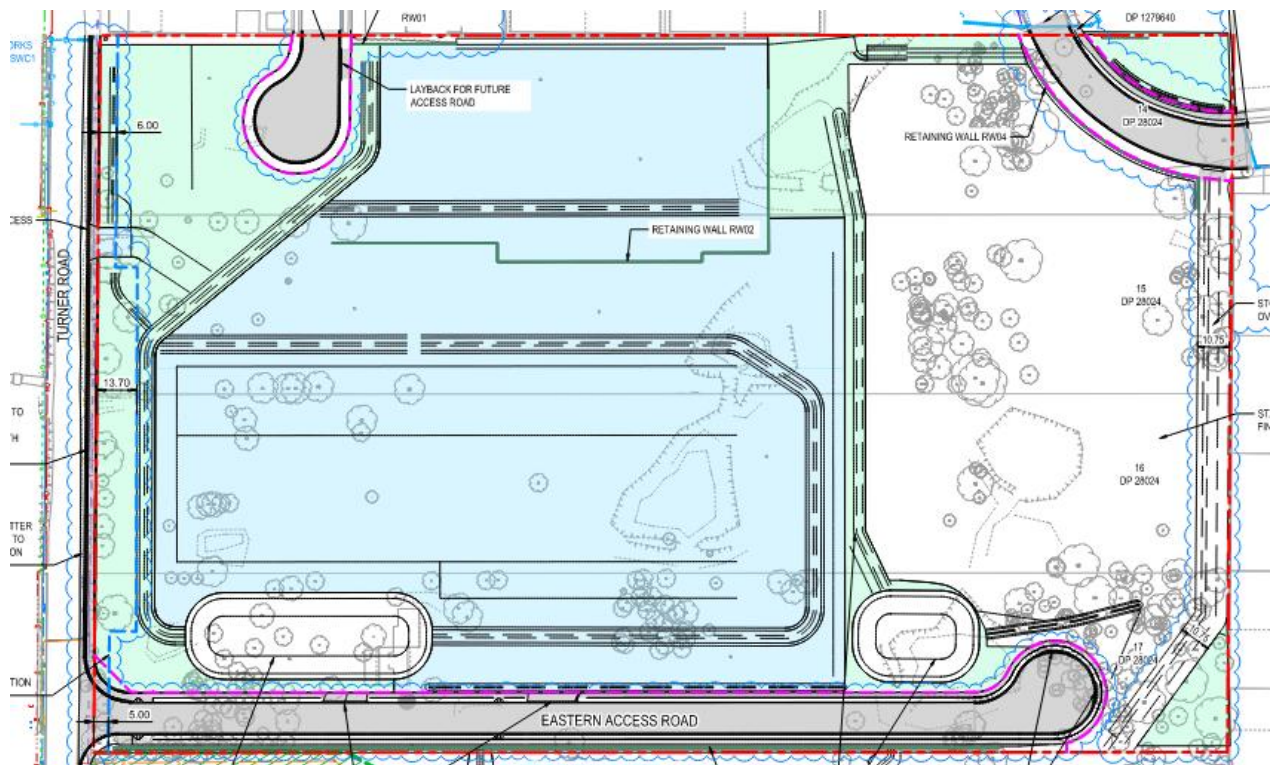
- Early Works – Bulk Earthworks, Retaining Walls and Public Domain Works

### SSD-680137154 – Main Works

- Construction Certificate 1 – Bulk Excavation and Substructure Works;
- Construction Certificate 2 – Remaining Structure, Façade, Fit out of ROMP 1 & 2 and landscaping; and
- Main HV Substation Works are delivered prior to occupation by an accredited contractor in accordance with the utility provider.

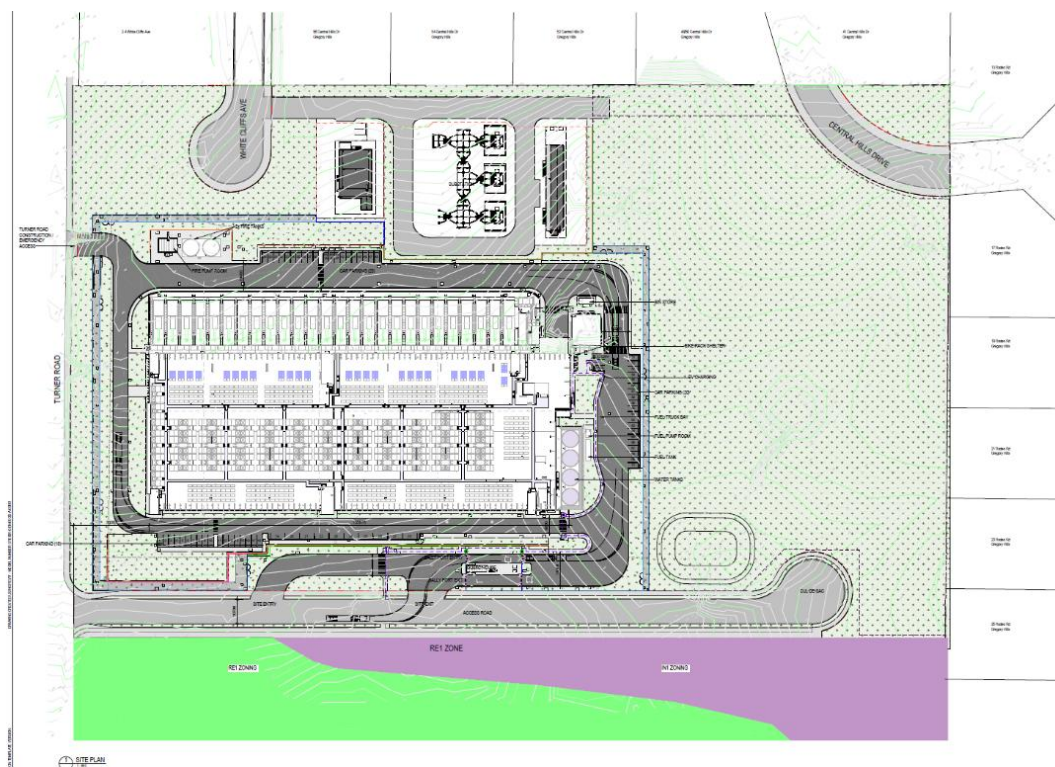
Refer to **Figure 1-2** for Early Works extent and **Figure 1-3** for Main Works extent.

The overall Early Works site plan is shown on **Figure 1-2** below. The Early Works includes decommissioning of pre-existing dams, demolition of dwellings, bulk earthworks, as well as the delivery of surrounding roads.



**Figure 1-2: Early Works Site Diagram**

The overall site plan for the Main Works is shown on **Figure 1-3** below. The 12 Hall Data Centre is split among two levels and is surrounded by landscaped areas, pavements and ancillary buildings.



**Figure 1-3: Main Works Site Diagram**

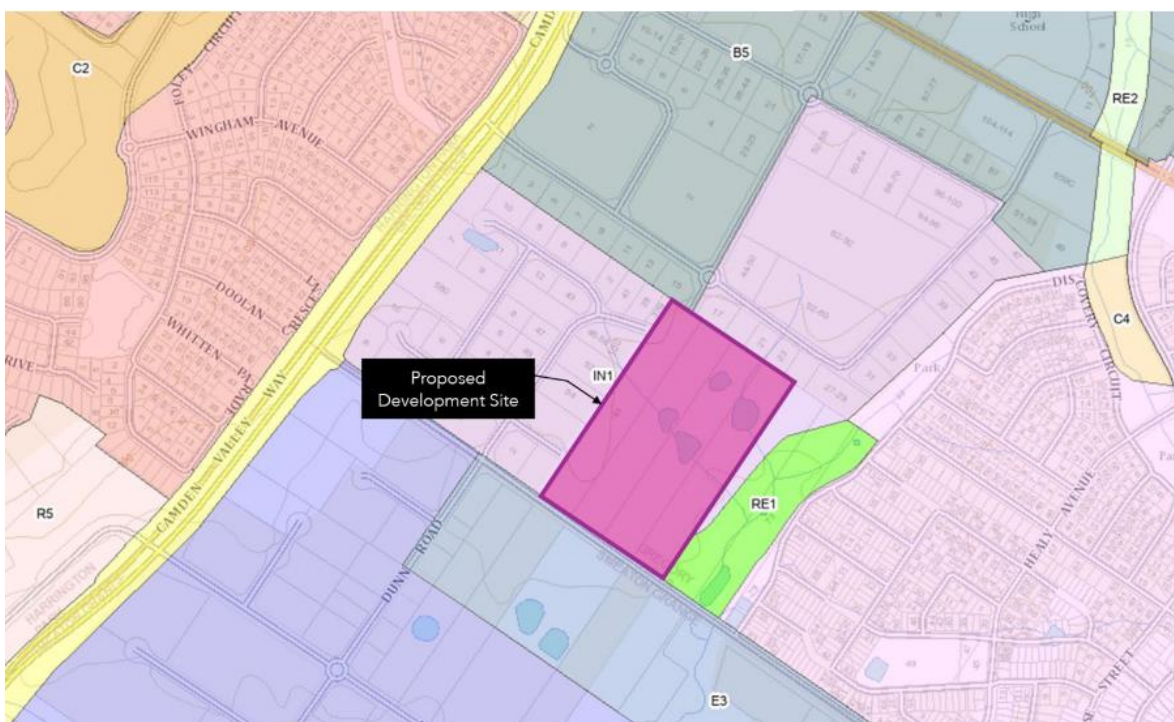
### 1.3 Project Location

Refer to **Figure 1-4** below for the Site Location. The site is located at Lot 14, 15, 16 and 17, DP 2802, 43-61 Turner Road, Gregory Hills, NSW, 2557, within the Camden Local Government Area (LGA) and is governed by the Turner Road Precinct Development Control Plan (DCP) 2018. The Project is bound by Turner Road to the south, and Rodeo Drive to the north. On the east side of the project, there is an existing nature reserve, and the west contains several existing industrial developments.



**Figure 1-4: Site Location**

Refer to **Figure 1-5** for Site Overlay. The site is approximately 9.74 hectares (ha) and situated within a General Industrial (IN1) zone, with adjacent land uses including IN1 and Business Development (B5) to the north, a mix of Public Recreation (RE1) and IN1 to the east, Productivity Support (E3) to the south, and IN1 to the west.



**Figure 1-5: Site Overlay**

## 1.4 Project Program

The overall Project Program is outlined below.

**Table 1-1: Project Program**

| Early Works Approved Via <i>DA/2024/616/1</i> |                               |
|-----------------------------------------------|-------------------------------|
| Early Works                                   | October 2025 to November 2028 |
| Main Works Approved Via <i>SSD-680137154</i>  |                               |
| Earthworks                                    | July 2026 to October 2026     |
| Structure and Building Envelope               | August 2026 to June 2028      |
| Internal Fit Out                              | January 2027 to October 2028  |
| Commissioning                                 | April 2028 to November 2028   |

## 1.5 Regulatory Compliance and Guidelines

The following WMP has been prepared in general accordance with the following documents:

- Camden Councils Waste Management Guideline 2019 (Camden Council, 2019);
- Turner Road DCP Waste Management (DPE, 2018); and
- Development Consent SSD-68013714, issued 21 November 2025.

## 1.6 SSDA Conditions Relevant and Compliance Requirements Relevant to this WMP

**Table 1-2** outlines the controls from Section 8.3 of the Turner Road DCP 2018 (DPE, 2018) and outlines where the control is addressed in this WMP. **Table 1-3** outlines the controls from the Camden Council's Waste Management Guideline 2019 (Council, 2019).

**Table 1-4** provides a summary of the relevant consent conditions from the main construction development relevant consent conditions (SSD-680137414.) The summary details the consent requirements which are addressed in this WMP, and where the relevant procedures and/or information can be found.

**Table 1-2: Turner Road DCP 2018 Waste Controls**

| Control                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Where its Addressed                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>(1) A Waste Management Plan is to be submitted with all DAs with the exception of single dwelling housing or superlot subdivision applications. The Plan is to address:</p> <ul style="list-style-type: none"> <li>• how recycled material, rubbish and other waste generated by clearing, excavation and construction is to be stored and controlled,</li> <li>• the type and volume of waste expected to be generated during construction, and</li> <li>• the method and location for the collection and disposal of waste.</li> </ul> | <ul style="list-style-type: none"> <li>• Refer to <b>Table 5-6</b> and <b>Section 5.4</b>;</li> <li>• Refer to <b>Section 5.2</b>; and</li> <li>• Refer <b>5.4.5</b> and <b>Table 5-6</b>.</li> </ul> |
| All residential dwellings shall be provided with a garbage, recyclables and greenwaste service unless specifically exempted by Council.                                                                                                                                                                                                                                                                                                                                                                                                     | <b>Not applicable</b>                                                                                                                                                                                 |
| All business and industrial operations are to provide adequate on-site waste storage facilities that are readily accessible and appropriately screened from view.                                                                                                                                                                                                                                                                                                                                                                           | <b>Section 5.4.5</b>                                                                                                                                                                                  |
| Development must demonstrate that the design takes into account refuse storage and collection without reducing the amenity of a dwelling or neighbouring lots.                                                                                                                                                                                                                                                                                                                                                                              | <b>Section 5.4.5</b>                                                                                                                                                                                  |
| Storage areas for rubbish bins are to be located away from the front of development where they have a significant negative impact on the streetscape, the visual                                                                                                                                                                                                                                                                                                                                                                            | <b>Not applicable (operational)</b>                                                                                                                                                                   |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| presentation of the building entry and on the amenity of residents, building users and pedestrians.                                                                                                                                                                                                                                                                                                                                                                                                            |                       |
| For each dwelling house, an area adjacent to the kerb, suitable for the placement of waste bins for the weekly collection, should be available and shown on the landscape plan. The area shall be on evenly graded land, running parallel to the rear of the kerb and measure 3m x 0.9m. The area is to be clear of any obstructions up to a height of 3.9m above ground. Some medium density housing may allow for on verge waste collection dependent on the available space.                                | <b>Not applicable</b> |
| In instances where the location of a bin collection area is not able to be achieved in front of the dwelling, Council may request the provision of waste bin pads. If required, waste bin pads are to be located on either side of the road and installed adjacent to the back of the kerb. They are to be installed by the developer during construction of the subdivision with a maximum of 3 lots permitted per bin pad. The pads are to be clear of any obstructions up to a height of 3.9m above ground. | <b>Not applicable</b> |
| Subdivisions shall be designed to ensure garbage collection is not required to be undertaken from 4 lane sub-arterial roads. Subdivision design should only anticipate garbage collection from 2 lane subarterial roads where direct access to individual lots is proposed.                                                                                                                                                                                                                                    | <b>Not applicable</b> |
| All residential dwellings shall be provided with a garbage, recyclables and greenwaste service unless specifically exempted by Council.                                                                                                                                                                                                                                                                                                                                                                        | <b>Not applicable</b> |

**Table 1-3: Submission Requirements from Camden Councils Waste Management Guidelines 2019**

| Submission Requirements                                                                                                                                           | Where this is addressed                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 3. Construction Waste Management – Submission Requirements                                                                                                        |                                               |
| 1. A Waste Management Plan (WMP) must be submitted with any Development Application proposing construction works. The WMP must include the following information: |                                               |
| a. Estimated volumes of waste materials generated (in cubic metres). See the rates in APPENDIX 1 for a guide;                                                     | Refer <b>Section 5.2</b>                      |
| b. Reuse/recycling opportunities to manage excess construction materials generated during the construction phase; and                                             | Refer <b>Table 5-6</b> and <b>Section 5.4</b> |
| c. Steps taken to reduce waste brought to site.                                                                                                                   | Refer <b>Section 5.4.1</b>                    |

|                                                                                                  |                   |
|--------------------------------------------------------------------------------------------------|-------------------|
| 2. A site plan or similar which indicates:                                                       |                   |
| a. Location of sorting area/s where waste will be sorted for disposal or recycling;              | <b>Appendix A</b> |
| b. Location of storage area/s where waste and soil stockpiles will be stored onsite; and         | <b>Appendix A</b> |
| Note: This is to include colour coding of waste containers or the provision of detailed signage. |                   |
| c. Collection area which is clear of any obstructions.                                           | <b>Appendix A</b> |

**Table 1-4: Relevant Consent Requirements (SSD-68013714)**

| Consent Requirement                                                                                                                                                                                                                       | Where it is addressed              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Part B – Specific Environmental Conditions                                                                                                                                                                                                |                                    |
| B46. Waste generated by the development must be secured and maintained within designated on-site waste storage areas until it is removed from the site.                                                                                   | Refer <b>Appendix A</b>            |
| B47. The Applicant must assess and classify all liquid and non-liquid wastes to be removed from the site in accordance with the latest version of the EPA's <i>Waste Classification Guidelines Part 1: Classifying Waste</i> (EPA, 2014). | Refer <b>Section 5.1</b>           |
| B48. The Applicant must ensure:                                                                                                                                                                                                           | (a) Refer <b>Section 5.4.3.</b>    |
| (a) All e-waste materials removed from the site are directed to a reuse or recycling facility lawfully permitted to accept the materials (or as otherwise agreed to by the Planning Secretary); and                                       | (b) Refer to <b>Section 5.4.3.</b> |
| (b) All other waste materials removed from the site are directed to a waste management facility or premises lawfully permitted to accept the materials.                                                                                   |                                    |
| B49. Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing or disposal.                                                                                                      | Refer <b>Section 5.4.1.</b>        |
| B50. The Applicant must:                                                                                                                                                                                                                  | (a) Refer <b>Section 5.3.</b>      |
| (a) Implement suitable measures to manage pests, vermin and declared priority weeds on the site; and                                                                                                                                      | (b) Refer <b>Section 5.7.</b>      |
| (b) Inspect the site 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.

#### Appendix F – Summary of mitigation and management measures

W01. Waste will be managed in line with the waste hierarchy. A Construction Waste Management Plan (CWMP) will be prepared and meet the requirements outlined in Camden Council's Waste Management Guidelines. It will include final provisions for segregation and separate collection of recoverable materials, including green waste, excavated natural materials and metals.

Refer to **Figure 3-1** for waste hierarchy.

Refer to **Table 1-3** for compliance with Camden Council's Waste Management Guidelines.

Refer to **Section 5.4** for waste segregation.

Refer to **Section 5.1** for waste streams.

W02. The CWMP will include:

- Measures for containment of waste during storage and transport, such as covering, fencing and bunding;
- Requirement that all waste be delivered to an appropriately licensed facility for recovery or disposal. Receipts for all disposed materials must be kept and made available for inspection by regulatory authorities.

Refer to **Section 5.4** for measures for containment of waste during storage and transport.

Refer to **Section 5.4.3** for recovery and disposal requirements.

W03. The CWMP will outline appropriate control and disposal options of any high threat weeds identified on the site.

Refer **Section 5.3**.

## 1.7 Objectives

The key objective of this WMP is to support the Client in their project through identifying the types and quantities of potential waste streams and to establish management measures to prevent environmental harm, minimise waste and maximise resource preservation.

This WMP specifically aims to:

- Address the Turner Road DCP 2018 requirements for waste;
- Reduce waste generation and maximise re-use and recycling during the construction stages;
- Comply with legislative criteria and adhere to waste minimisation guidance and standards; and
- Apply the waste management hierarchy (**Section 3.3**) throughout the construction stages.

## 2. Development Description

### 2.1 Location and Site Layout

The site details are summarised in **Table 2-1**. The location is shown in **Figure 1-4** and the approved plans are provided in **Appendix A**.

**Table 2-1: Site Summary**

|                                                                 |                                                                                                                       |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| Site Boundary: Lot/Deposit Plan (DP)                            | Lot 14 DP28024, Lot 15 DP28024, Lot 16 DP28024, Lot 17 DP28024 and part of Lot 18 DP28024                             |
| Site Address                                                    | 43, 49, 55, 61 and part of 67 Turner Road, Gregory Hills, NSW                                                         |
| Site Area                                                       | 9.74 Ha                                                                                                               |
| Local Government Authority (LGA)                                | Camden Council ( <i>Camden Local Environmental Plan 2010</i> )                                                        |
| Approximate Coordinates (GDA 94 Map Grid of Australia (MGA) 55) | Easting: 847434.692<br>Northing: 6228292.194                                                                          |
| Current Zoning                                                  | IN1 General Industrial, under the State Environmental Planning Policy (SEPP) (Precincts – Western Parkland City) 2021 |
| Current Land Use                                                | Vacant lots, with most historic dwelling having been demolished with exception of 61 Turner Road.                     |
| Previous Land Use                                               | Rural Residential and agricultural including onsite water dams                                                        |

## 2.2 Existing Environment

The table below provides a summary of the existing environment.

**Table 2-2: Summary of Existing Site Environment**

| Aspect             | Summary of Information                                                                                                                                                                                                                                                                                               |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Topography         | The site is located between 90 and 108 m Australian Height Datum (AHD). The site is undulating, with a downwards slope towards the east boundary of the site. The topography surrounding the site is generally flat due to modifications of the landscape associated with commercial/industrial developments.        |
| Geology            | The site is underlain by the Bringelly Shale comprising shale, carbonaceous claystone, claystone, laminate, fine to medium grained lithic sandstone, and rare coal and tuff deposits. An unnamed Wianamatta Group sandstone is also located on the site comprising a fine to medium grained quartz lithic sandstone. |
| Soil landscape     | Arcadis investigations encountered light grey to reddish brown silt clay natural soils with gravel inclusions. The clay was observed to be low to high plasticity. The natural soils were underlain by light grey to red weathered shale.                                                                            |
| Acid sulfate soils | The site is located in an extremely low risk of acid sulfate soils (1-5 % probability). Arcadis did not observe any indications of ASS in the surrounding surface water channels or during investigations at the site.                                                                                               |

## 3. Legislative and Other Requirements

### 3.1 Legislation

This WMP has been prepared in accordance with the requirements of the NSW *Waste Avoidance and Resource Recovery Act 2001* (WARR Act), and the NSW *Protection of the Environment Operations Act 1997* (POEO Act). A summary of key legislation relevant to waste management at the site is provided **Table 3-1** below.

**Table 3-1: NSW Waste Legislation Summary**

| Legislation                                                                                                                                          | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Protection of the Environment Operations Act 1997</i> (POEO Act)<br><br><i>Protection of the Environment Operations (General) Regulation 2022</i> | <p>The POEO Act and associated regulations is key environment protection legislation administered by the NSW Environment Protection Authority (EPA). The object of the legislation is to achieve the protection, restoration and enhancement of the quality of the NSW environment.</p> <p>The Act provides a definition of ‘waste’ for regulatory purposes, along with a list of activities that require an environmental protection licence (EPL).</p> <p>The POEO Act enables the Government to establish policy instruments for setting environmental standards, goals, protocols and guidelines.</p> <p>All material to be excavated and removed from the site (including associated activities such as classification) are required to be undertaken in accordance with the requirements of the POEO Act, including:</p> <ul style="list-style-type: none"> <li>• Ensuring waste is classified appropriately and in accordance with relevant guidelines;</li> <li>• Waste materials are disposed of at appropriately licensed facilities; and</li> <li>• Other materials are removed to facilities lawfully able to accept such materials.</li> </ul> <p>The POEO General Regulation 2022 supports the POEO Act by outlining detailed provisions for environment protection licenses, pollution control, and compliance measures.</p> |
| <i>Protection of the Environment Operations (Waste) Regulation 2014</i> (POEO Waste Regulation)                                                      | <p>The POEO Waste Regulation outlines requirements relating to non-licensed waste activities and waste transporting.</p> <p>The Regulation requires that wastes are stored in an environmentally safe manner and that vehicles used to transport waste must be covered when loaded.</p> <p>The Regulation exempts certain waste streams from the full waste tracking and record keeping requirements. Waste tracking is required only for industrial and hazardous wastes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <i>Waste Avoidance and Resource Recovery Act 2001</i> (WARR Act)                                                                                     | <p>The WARR Act promotes waste avoidance and resource recovery to achieve a continual reduction in waste generation, provides for development of a state-wide Waste Strategy, and introduces a scheme to promote extended producer responsibility for the life cycle of a product. Objectives of the Act include:</p> <ul style="list-style-type: none"> <li>• To encourage the most efficient use of resources and to reduce environmental harm;</li> <li>• To ensure that resource management options are considered against a hierarchy (see <b>Section0</b>);</li> <li>• Provide for the continual reduction in waste generation;</li> <li>• To minimise the consumption of natural resources and the final disposal of waste;</li> <li>• To ensure that industry shares with the community the responsibility for reducing and dealing with waste; and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Legislation                                                                                                           | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Environmental Planning and Assessment Act 1979</i><br><i>Environmental Planning and Assessment Regulation 2021</i> | <ul style="list-style-type: none"> <li>To assist in the achievement of the objectives of the POEO Act.</li> </ul> <p>The Act and the Regulation provide the overarching structure for planning in NSW. They provide for a number of other statutory documents to support the planning structure, including State Environmental Planning Policies and Local Environmental Plans. The objectives include:</p> <ul style="list-style-type: none"> <li>The proper management, development and conservation of natural and artificial resources; and</li> <li>To encourage ecologically sustainable development.</li> </ul> |
| <i>Contaminated Land Management Act 1997</i><br><i>Contaminated Land Management Regulation 2022</i>                   | <p>This Act establishes a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation.</p> <p>The Regulation supports the Act by providing detailed procedures and requirements for managing contaminated land in NSW.</p>                                                                                                                                                                                                                                                                                                 |

## 3.2 Guidelines

Guidance documents and policies considered in the preparation of the WMP are included in **Table 3-2** below.

**Table 3-2: NSW Guidance Summary**

| Guideline                                                                                                                 | Purpose                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Waste Classification Guidelines (Part 1: Classifying Waste) (EPA, 2014)</i>                                            | The Waste Classification Guidelines have been established by the NSW EPA to assist waste generators to classify wastes. Wastes are classified into groups that pose similar risks to environment and human health. Waste classifications are discussed further in <b>Section 4</b> .                                                                                                                                                                                                                                                                                                                         |
| <i>A management toolkit: Construction and demolition waste (EPA, 2020)</i>                                                | The toolkit provides guidance on how to reduce the risk of unlawful or fraudulent behaviour by contractors and subcontractors during the tender, contract and project management phases of construction and demolition projects.                                                                                                                                                                                                                                                                                                                                                                             |
| <i>Building Code of Australia (BCA)</i>                                                                                   | The BCA contains technical provisions for the design and construction of buildings and other structures, covering such matters as structure, fire resistance, access and egress, services and equipment, and energy efficiency as well as certain aspects of health and amenity.                                                                                                                                                                                                                                                                                                                             |
| <i>NSW Government Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027 (WSM Strategy)</i>                     | <p>The WSM strategy aims to continually improve the state's policies and targets for waste reduction and landfill diversion. Stage 1 of the strategy sets the following targets:</p> <ul style="list-style-type: none"> <li>Reduce total waste generated by 10% per person by 2030;</li> <li>Have an 80% average recovery rate from all waste streams by 2030;</li> <li>Significantly increase the use of recycled content by governments and industry;</li> <li>Phase out problematic and unnecessary plastics by 2025; and</li> <li>Halve the amount of organic waste sent to landfill by 2030.</li> </ul> |
| <i>NSW EPA Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities 2012</i> | The guide provides advice to assist architects, developers, council staff and building managers to incorporate better waste management practice into the design, establishment, operation and ongoing management of waste services in commercial and industrial developments.                                                                                                                                                                                                                                                                                                                                |

| Guideline                                                                                                        | Purpose                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>How to manage and control asbestos in the workplace, SafeWork NSW Code of Practice, 2019 (NSW Government)</i> | <p>The Code of Practice is an approved code of practice under section 274 of the <i>Work Health and Safety Act 2011</i>.</p> <p>The Code provides guidance on how to manage risks associated with asbestos and asbestos containing material at the workplace and thereby minimise the incidence of asbestos-related diseases such as mesothelioma, asbestosis and lung cancer.</p>               |
| <i>Australian Government Construction and Demolition Waste Guide, 2011</i>                                       | The aim of the guide is to help develop effective markets for materials diverted or derived from construction and demolition waste streams.                                                                                                                                                                                                                                                      |
| <i>Sampling Design Guidelines – Contaminated Sites. NSW EPA, 2022</i>                                            | <p>The Sampling Design Guidelines were established by the NSW EPA to:</p> <ul style="list-style-type: none"> <li>• Encourage the use of a statistically based approach to the design and sampling for contaminated sites and the interpretation of these samples for assessing and validating contaminated sites; and</li> <li>• Provide a convenient summary of statistical methods.</li> </ul> |

### 3.3 Waste Hierarchy

Waste management for the project will be undertaken in accordance with the waste hierarchy, which underpins the objectives of the WARR Act. The waste hierarchy shown below demonstrates preferred approaches to waste management to ensure sustainable development and use of resources.



**Figure 3-1: Waste Hierarchy**

The hierarchy also aims to maximise efficiency and avoid unnecessary consumption of resources. This WMP seeks to implement the waste hierarchy to minimise waste disposal and promote waste reduction in order of preference:

- Reduce or avoid waste through selection of items and design;
- Reuse materials without further processing;

- Recycle and process waste for reuse as a new product;
- Recover energy through combustion of materials where acceptable and in accordance EPA Regulations;
- Treat waste to stabilise the waste product for disposal or reuse; and
- Dispose of waste when no other management options are appropriate.

## 4. Classification of Waste

### 4.1 EPA Waste Classification

The NSW EPA (2014) *Waste Classification Guidelines Part 1: Classifying Waste* provides for the clarification of waste into groups that pose similar risks to the environment and human health (EPA, 2014), which are defined in the POEO Act. Classes of waste described in the guideline are described in **Table 4-1**.

**Table 4-1: Summary of NSW EPA Waste Classifications**

| Waste Classification                                                                                                                                                                                                                            | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Special waste                                                                                                                                                                                                                                   | Special wastes are wastes that pose specific regulatory requirements due to the risks of harm to the environment and human health. These wastes include clinical and related waste, asbestos waste, waste tyres, and anything classified as special waste under an EPA gazettal notice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Liquid waste                                                                                                                                                                                                                                    | <p>Liquid waste is classified as any waste (other than special waste) that meets the following criteria:</p> <ul style="list-style-type: none"> <li>• Has an angle of repose of less than 5 degrees above horizontal;</li> <li>• Becomes free-flowing at or below 60 degrees Celsius or when it is transported;</li> <li>• Is generally not capable of being picked up by a spade or shovel; and/or</li> <li>• Is classified as liquid waste under an EPA gazettal notice.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                            |
| Pre-classified waste: <ul style="list-style-type: none"> <li>• Hazardous waste</li> <li>• Restricted solid waste</li> <li>• General solid waste (putrescible)</li> <li>• General solid waste (non-putrescible).</li> </ul>                      | <p>Where the waste is neither liquid nor special waste; the EPA has pre-classified other commonly generated waste types, as defined in Schedule 1 of the POEO Act. This includes hazardous waste, restricted solid waste, general solid (putrescible) and general solid (non-putrescible) waste. Putrescible waste is the component of the waste stream that is liable to become putrid, and usually refers to vegetative, food and animal products.</p> <p>A list of all currently gazetted waste classifications is provided on the EPA website at:<br/> <a href="https://www.epa.nsw.gov.au/your-environment/waste/">https://www.epa.nsw.gov.au/your-environment/waste/</a>.</p> <p>Where material is classified as hazardous waste, it is noted that such materials cannot be directly disposed of and must be treated prior to disposal by an appropriately licensed facility/operator.</p> |
| Wastes classified via chemical assessment: <ul style="list-style-type: none"> <li>• Hazardous waste</li> <li>• Restricted solid waste</li> <li>• General solid waste (putrescible)</li> <li>• General solid waste (non-putrescible).</li> </ul> | <p>Where the waste does not fall into one of the above categories, chemical assessment of the material is required to finalise a waste classification as per the procedures outlined in detail in EPA (2014) and/or consideration of General or Specific Waste immobilisation approvals as approved under the POEO Waste Regulation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

The “A Management Toolkit: Construction and Demolition Waste” (EPA, 2020) provides the following flow chart (**Figure 4-1**) for management of waste during construction and demolition activities. This flow chart provides considerations for potential waste streams and their typical reuse or disposal. These principles are detailed within this waste management plan.



**Figure 4-1: EPA Waste Flow Considerations During Construction (Source (EPA,2020))**

## 5. Construction Waste Management

### 5.1 Waste Streams and Classification

A variety of waste types will be generated during construction activities. Potential waste types and corresponding EPA classifications are summarised in **Table 5-1**.

**Table 5-1: Potential Waste Types and Classifications for the development**

| Waste Type                                                                      | EPA Classification                                                                                                       | Generated |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-----------|
| Metals (steel, aluminium, stainless steel, and copper piping or wire)           | General solid waste (non-putrescible)                                                                                    | ✓         |
| Green/Wood waste                                                                | General solid waste (non-putrescible)                                                                                    | Potential |
| Blockwork                                                                       | General solid waste (non-putrescible)                                                                                    | Potential |
| Glazed bricks                                                                   | General solid waste (non-putrescible)                                                                                    | Potential |
| Concrete (Building frames, cores & roof, external works, slab, grouts)          | General solid waste (non-putrescible)                                                                                    | ✓         |
| Glass                                                                           | General solid waste (non-putrescible)                                                                                    | Potential |
| Asphalt                                                                         | General solid waste (non-putrescible)                                                                                    | Potential |
| Plastic - durables (non-packing)                                                | General solid waste (non-putrescible)                                                                                    | Potential |
| Plastic and foam packaging                                                      | General solid waste (non-putrescible)                                                                                    | Potential |
| General refuse                                                                  | General solid waste (putrescible), and General solid waste (non-putrescible)                                             | ✓         |
| Electrical (HV and LV)                                                          | General solid waste (non-putrescible)                                                                                    | Potential |
| Optic fibre wiring                                                              | General solid waste (non-putrescible)                                                                                    | Potential |
| Hazardous Waste (paints, solvents, waste oils, chemicals and related packaging) | Related empty containers which held these liquid waste products: general solid waste (non-putrescible) – pre classified. | ✓         |
| Mixed recycling (paper, cardboard etc)                                          | General solid waste (non-putrescible) – pre classified                                                                   | ✓         |
| PVC pipes (stormwater, electrical, optic fibre, sewer)                          | General solid waste (non-putrescible)                                                                                    | Potential |
| Septic                                                                          | Liquid waste                                                                                                             | ✓         |
| Contaminated materials (including asbestos and contaminated soil)               | Special waste                                                                                                            | ✓         |
| Batteries                                                                       | Hazardous waste                                                                                                          | Potential |

### 5.2 Estimated Quantities

Indicative quantities of waste likely to be generated during construction for some waste streams have been calculated based on published waste generation rates for construction projects. Published data for total waste volumes per unit area and for waste composition have been used and combined with the total areas of each component of the project to estimate waste generation.

Estimates of total waste volumes per unit area have been derived from benchmark data developed by the UK Building Research Establishment (BRE, 2012) in **Table 5-2**, which is based on waste generation at various construction projects.

A value of 13.0 m<sup>3</sup> per 100 m<sup>2</sup> has been adopted, consistent with the 'Industrial' waste value, which most closely reflects this project component.

**Table 5-2: Average Volume of Waste Produced by Different Project Types**

| Project Type         | Average volume (m <sup>3</sup> ) of waste per 100 m <sup>2</sup> |
|----------------------|------------------------------------------------------------------|
| Residential          | 18.1                                                             |
| Public buildings     | 20.9                                                             |
| Leisure              | 14.4                                                             |
| Industrial Buildings | 13.0                                                             |
| Healthcare           | 19.1                                                             |
| Education            | 20.7                                                             |
| Commercial Other     | 17.4                                                             |
| Commercial Offices   | 19.8                                                             |
| Commercial Retail    | 20.9                                                             |

Indicative waste composition information shown in **Table 5-3** (derived from the *NSW Waste Avoidance and Resource Recovery Strategy Progress Report 2014-15* (EPA, 2017)) has been applied to the estimated total waste volumes to estimate quantities for each waste stream during construction.

**Table 5-3: Guideline to Waste Composition and Volumes**

| Waste Type                                                                                          | Estimated Waste % | Conversion Factor (Density) (Tonnes per m <sup>3</sup> ) |
|-----------------------------------------------------------------------------------------------------|-------------------|----------------------------------------------------------|
| Masonry materials (including asphalt, concrete/bricks/tiles, rubble and plasterboard/cement sheets) | 60.04             | 1.5                                                      |
| Metals (including steel, aluminium and other non-ferrous)                                           | 8.44              | 0.5                                                      |
| Organics (including timber and vegetation)                                                          | 7.32              | 0.19                                                     |
| Paper/cardboard                                                                                     | 0.38              | 0.2                                                      |
| Plastics (including PET, HDPE and other)                                                            | 0.36              | 0.14                                                     |
| Glass                                                                                               | 0.08              | 0.347                                                    |
| Hazardous materials (including industrial waste and asbestos)                                       | 2.25              | 1.31                                                     |
| Other (textiles, rubber and composites)                                                             | 21.13             | 1.3                                                      |

**Table 5-4** summarises the indicative volumes for the separate waste types that have been estimated for the project's construction scope of works. The total waste volumes for the development for these waste types were estimated using the construction footprint of the project (93,000 m<sup>2</sup>).

The quantities outlined in **Table 5-4** are high level estimates and are intended to provide an indication of potential waste generation quantities. It is expected that actual waste quantities and composition will vary depending on outcomes of detailed design, materials specification and construction planning and methods. Strategies that will be implemented to minimise waste generation and maximise reuse and recycling are outlined in **Section 5.4**.

**Table 5-4: Approximate quantities of waste generated during construction**

| Waste Type                                                                                          | Approximate Quantity (m <sup>3</sup> ) | Estimated Tonnes (using the conversion factors in Table 5-3) |
|-----------------------------------------------------------------------------------------------------|----------------------------------------|--------------------------------------------------------------|
| Masonry materials (including asphalt, concrete/bricks/tiles, rubble and plasterboard/cement sheets) | 7258.84                                | 10,888.3                                                     |
| Metals (including steel, aluminium and other non-ferrous)                                           | 1020.4                                 | 510.2                                                        |
| Organics (including timber and vegetation)                                                          | 884.99                                 | 168.1                                                        |
| Paper / cardboard                                                                                   | 45.94                                  | 9.2                                                          |
| Plastics (including PET, HDPE and other)                                                            | 43.52                                  | 6.1                                                          |
| Glass                                                                                               | 9.67                                   | 3.4                                                          |
| Hazardous materials (including industrial waste and asbestos)                                       | 272.03                                 | 356.4                                                        |
| Other (textiles, rubber and composites)                                                             | 2554.62                                | 3,321.0                                                      |
| <b>Total</b>                                                                                        | <b>12,090 m<sup>3</sup></b>            | <b>15,262.6 tonnes</b>                                       |

The volume of waste to be generated during construction at the site is estimated to be 12,090 m<sup>3</sup> or 15,262.6 tonnes. Efforts will be made by the Principal Contractor to reduce this volume by implementing the aspects proposed in this management plan as well as using additional detailed investigations which will provide a more accurate assessment of waste volumes.

### 5.2.1 Cut and fill predicted waste

Under the early works DA separate to this SSDA for the main works, the site is estimated to be modified by civil earthworks during the site establishment to level the site. The estimated total cut and fill balances are in Table 5-5 which were derived from the detailed cut and fill plan presented in **Appendix B**.

**Table 5-5: Cut and fill balance on site**

|                      |                                  |
|----------------------|----------------------------------|
| <b>Total Cut</b>     | 49,716 m <sup>3</sup>            |
| <b>Total Fill</b>    | 39,527 m <sup>3</sup>            |
| <b>Total Balance</b> | 10,188 m <sup>3</sup> excess cut |

## 5.3 Expected Waste Management and Disposal

The table below summarises the expected management of waste types identified in **Section 5.2**

**Table 5-6: Waste Management for Identified Waste Streams**

| Waste Stream            | Management                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Concrete</b>         | <ul style="list-style-type: none"> <li>Concrete waste is likely to be generated during the construction works.</li> <li>There is also the possibility that concrete waste may be generated from excess concrete poured during construction, although this will be minimised wherever possible using the methods outlined in <b>Section 5.4</b>.</li> <li>Concrete can be reprocessed and may, in some instances, be reused across the subject site, however, the general practice is to break up/crush the concrete and arrange for disposal to a recycling facility or disposal offsite.</li> <li>Options may include disposal of excess concrete to a lined pit on site, to allow for regular reprocessing or disposal to a recycling facility. Wet supply may be placed back into supply trucks to return to the producer.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Excavated Soil</b>   | <ul style="list-style-type: none"> <li>Soil is likely to be generated during establishment activities, removal of trees, excavation to establish required site levels and other construction activities. Excavated soil will be re-used on site to achieve site levels or disposed appropriately offsite.</li> <li>In general, it is expected that assessment of relevant material will identify that undisturbed natural soil and bedrock at the site will meet the definition of Virgin Excavated Natural Material (VENM) or Excavated Natural Material (ENM). Formal classification will be required if removal from site is necessary during construction works. Any general fill soils removed from the property must first be formally classified as per the <i>NSW EPA Waste Classification Guidelines 2014</i> (EPA, 2014) prior to disposal.</li> <li>If, during excavation, soil is uncovered that is noticeably stained, has an odour or is suspected to be contaminated outside the known scope, then work should cease in that area immediately. The soil or material should be suitably assessed and sampled for possible contaminants.</li> <li>If excavated material cannot be retained for reuse on site (e.g. additional contamination is identified) then it must be disposed of at a licensed waste facility.</li> <li>Any imported fill shall be sampled prior to importation and shall conform to VENM as per the <i>EPA Waste Classification Guidelines – Part 1: Classifying Waste</i> (EPA, 2014).</li> <li>Where stockpiling is required prior to redistribution on site, control measures to avoid sediment and erosion will be implemented where appropriate. This may include establishing a bund or lining of the base with an impermeable HDPE plastic liner.</li> </ul> |
| <b>Metals</b>           | <ul style="list-style-type: none"> <li>There is a possibility that metal waste may be generated from excess materials purchased for the site as part of construction work, although this will be minimised wherever possible using the methods outlined in <b>Section 5.4.1</b>.</li> <li>Principal Contractor appointed by the client will investigate and determine appropriate storage and recycling of metals to reduce waste, including location and signage of skip bins onsite.</li> <li>Where recycling of metal is not feasible, for example distribution to salvage yards for reuse, the contractor will organise disposal of the metal to a licensed waste facility.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Green/Wood Waste</b> | <ul style="list-style-type: none"> <li>Green/wood waste will be generated during removal of trees. It is likely that wood waste (timber) may be generated from excess materials purchased as part of building construction works, although this will be minimised wherever possible using the methods outlined in <b>Section 5.4.1</b>.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <ul style="list-style-type: none"> <li>Principal Contractor appointed by the client will investigate and determine appropriate storage and recycling of timber to reduce waste. It is assumed the waste will be mulched and reused on site for soft landscaping.</li> <li>Construction waste may cause the spread of weeds, pests or pathogens within recovered waste materials. If any 'priority weeds' are identified, they are to be managed in accordance with the <i>NSW Biosecurity Act 2015</i> and other relevant guidance documents. If identified, a weed management plan shall be prepared to provide appropriate control and disposal measures to minimise impacts associated with the spread of weeds and plant pathogens.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Plastics</b>      | <ul style="list-style-type: none"> <li>Plastic wastes associated with packaging for construction materials can be recycled or in some cases returned to the supplier of the materials for reuse. Where possible, plastic (non-durable) wastes will be reduced using the methods outlined in <b>Section 5.4.1</b>.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>General Waste</b> | <ul style="list-style-type: none"> <li>Wastes such as food waste, organics and biodegradable material will be created as a result of worker activity on site. Non-putrescible wastes are generally inert, or solid, and are not able to be composted, recycled, reprocessed or reused.</li> <li>Principal Contractor appointed by the client will ensure adequate bins are provided on site for putrescible waste. General waste will need to be visually inspected daily and removed accordingly. This is particularly important around worker congregation areas, site office areas and toilet facilities.</li> <li>It is likely that general waste will increase at times of internal and service fit out during construction, primarily associated with excess packaging materials and workers on site. Principal Contractor will determine the location of skip bins and specify waste stream separation measures across the site.</li> <li>Where possible, co-mingled recycling bins will be provided in common areas at work sites for plastic and glass bottles, soft drink cans, aluminium and tin cans to avoid these items being disposed to landfill. Specialised bins for cigarette butts will also be provided in designated smoking areas.</li> <li>All bins will be covered when not in use to reduce airborne litter and litter entering the stormwater system.</li> </ul> |

## 5.4 General Waste Management Principles During Construction

### 5.4.1 Avoidance and Reduction of Waste

The construction contractor will be required to avoid waste generation, and endeavour to reuse materials where possible, thereby minimising waste generation.

During the construction phase, waste generation will be avoided through strategic selection of materials during design and purchasing, considering options to reduce waste generation for the project. This includes consideration of procurement of materials which are prefabricated, use minimal packaging, and are suitable for reuse across the site. Selection of construction materials will also consider the use of recycled items where practicable.

Opportunities to avoid wastes generated by construction include:

- Develop a procurement policy which considers waste avoidance measures such as:
  - Order site specific or prefabricated items where practicable to minimise surplus material;
  - Consider packaging material provided by suppliers during purchasing and reduce this requirement where possible, or consider returnable packaging; and
  - Material selection to consider recycled items.
- Refine waste stream estimates to ensure adequate on-site storage and segregation;
- Refine estimated volumes of materials for construction; and
- Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing or disposal.

### 5.4.2 Reuse and Recycling

For waste materials onsite, measures to separate waste streams will be implemented. This includes segregating wastes into appropriate dedicated bins or waste storage areas for reclamation on site or transportation to a designated recycling facility. These will be located away from primary street frontages and suitably screened from public areas.

Concrete waste and waste rinse water are not to be disposed of at the site and rinse waters are required to be prevented from entering surface waters, including natural and artificial watercourses.

If material containing asbestos is identified and cannot be safely removed/encapsulated, off-site disposal is the optimal option. The construction contractor will then liaise with a licensed asbestos removalist to determine a suitable disposal facility.

Procedures to manage the reuse and recycling of waste materials during construction include:

- Incorporation of waste management into development staging to promote reuse of materials across the site;
- Ensure areas for waste segregation are easily accessible and clearly defined;
- Ensure contractors are familiar with onsite waste storage areas for appropriate waste segregation; and
- Consider opportunities for materials reuse in areas in proximity to the site or local construction activities where practicable.

### 5.4.3 Treatment and Disposal

Project wastes may require treatment to stabilise them for appropriate disposal to reduce the risk of harm to human health or the environment. These materials, which could include hazardous, bulk and electronic

waste, are not suitable for reuse or recycling and must be segregated and disposed of via a suitably qualified contractor to a licensed facility appropriately.

Wastes will only be sent to landfill or disposal facilities where the prioritised management methods in the hierarchy cannot be effectively implemented. The construction contractor will liaise with the local council to determine appropriate disposal locations for potential waste streams.

Measures to manage the treatment and disposal of waste materials during construction include:

- Ensure wastes which cannot be reused or recycled and require disposal are clearly segregated from those which have the potential to be reused;
- Provide segregated bins for subcontractors to dispose of construction waste (i.e., metal, plastics and cardboard);
- Contractors and staff to be inducted into site waste management practices;
- Hazardous materials including asbestos (if identified) to be disposed of in accordance with the handling and disposal requirements of SafeWork NSW and NSW EPA;
- General wastes to be disposed of in accordance with NSW EPA/local council requirements; and
- Toilet facilities must be regularly serviced and emptied by a licensed contractor.

Concrete waste and waste rinse water are not to be disposed of at the site and rinse waters are required to be prevented from entering surface waters, including natural and artificial watercourses.

#### 5.4.4 Waste Stream Management Options

The waste management measures outlined in **Table 5-6** will be implemented for each waste stream generated as part of the project. Key waste streams identified for this project have been discussed in more detail in this section to ensure appropriate waste handling for each type of waste.

Each waste stream will be separated and stored appropriately to ensure each type of waste is handled in the most appropriate and efficient way. The numbers and size of waste storage bins, containers, stockpile areas and loading zones on site will be determined by the excavation and construction contractor.

The waste storage areas for construction can be found **Appendix A** and are further discussed in **Section 5.4.5** below.

The Principal Contractor appointed by the client will implement its own waste management systems in accordance with this plan to ensure any existing waste management systems are not impacted by the redevelopment works.

#### 5.4.5 Construction Waste Storage Areas

Adequate on-site waste storage facilities that are readily accessible and appropriately screened from view are to be provided. Waste collection vehicles are to have safe, reliable access to all collection points that are free of any obstructions and are to be able to manoeuvre to all waste collection points.

Waste storage and collection design is to consider avoiding reducing the amenity of a dwelling or neighbouring lots.

#### 5.4.6 Other Considerations

To ensure waste is not inadvertently lost during removal from site or unintentionally tracked off-site, the vehicles or trailers used to transport waste or excavated spoil from the site will be covered before leaving the subject site, to prevent spillage or escape of dust, waste or spoil from the vehicle or trailer. Any mud, splatter, dust and other material that is likely to be released from the wheels, underside or body of vehicles, or plant leaving the site will also be removed through a shaker bay or wash down area prior to leaving the subject site. Erosion and sediment control plans are to be implemented and followed.

## 5.5 Roles and Responsibilities During Construction

This WMP forms the basis of waste management on site for the construction phase of the development works.

It is expected that all construction personnel will commit to this WMP and be responsible for their own actions in adhering the waste management objectives. Waste management criteria (such as those contained in this report) is to be contractually binding for all contractors working on the site.

A Construction Site Manager will be the key person responsible for implementation of the WMP and adherence to applicable legislation, guidelines, licensing and project conditions outlined herein.

**Table 5-7** suggests responsibilities for waste management during construction noting that the job titles may vary during the delivery of the project.

**Table 5-7: Roles and Responsibilities during construction**

| Role                                    | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Environmental Management Representative | <ul style="list-style-type: none"> <li>Compliance with applicable environmental licences, legislation and project conditions. Ensure environmental management plan(s) across the site are adhered to and accurate to site conditions.</li> <li>Undertake inspections to ensure compliance.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Construction Site Manager               | <ul style="list-style-type: none"> <li>Review the WMP in light of any changes to construction activities or further information which may alter waste management practices.</li> <li>Ensuring workers and subcontractors are inducted into the WMP along with other applicable management plans.</li> <li>Responsible for undertaking procurement of construction materials in accordance with the waste management hierarchy.</li> <li>Segregation/classification of waste streams where required to ensure appropriate use, reuse, treatment and/or disposal.</li> <li>Ensure waste quantities generated are recorded, including tracking of receipts from waste recycling or disposal via the appointed waste contractor(s).</li> <li>Undertake auditing of contractor waste management against the requirements of the WMP and initiate corrective action by the contractor (as necessary).</li> <li>Undertake visual inspections daily to ensure waste management controls are implemented and maintained across the site.</li> </ul> |
| Health and Safety Manager               | <ul style="list-style-type: none"> <li>Safety inductions for all staff, workers and visitors.</li> <li>Work with Construction Site Manager to determine any safe handling of asbestos waste in compliance with regulatory requirements.</li> <li>Compliance with applicable environmental licences, legislation and project conditions. Ensure environmental management plan(s) across the site are adhered to and accurate to site conditions.</li> <li>Undertake visual inspections daily to ensure waste management controls are implemented and maintained across the site.</li> <li>Undertake auditing of waste management across the site as a component of broader environmental site monitoring.</li> </ul>                                                                                                                                                                                                                                                                                                                        |
| Site Workers                            | <ul style="list-style-type: none"> <li>Responsible for acting in accordance with the WMP and site inductions.</li> <li>Informing the Construction Site Manager of any waste management incidences and Health and Safety Manager of any safety issues associated with on-site activities.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

## 5.6 Training and Awareness

Staff present on site during the construction stage of the project will be required to undertake induction and awareness training inclusive of the WMP and site-specific waste management. This includes:

- Induction to the waste management hierarchy and use across the site;
- Details of responsibilities for waste management and key personnel;
- Site specific waste management practices relevant to the project stage such as:
  - Waste storage and stockpiling locations;
  - Waste disposal requirements;
  - Hazardous or special wastes;
  - Record of waste disposal details and receipts;
- Knowledge of emergency response procedures and contacts; and
- Asbestos Awareness Training.

Signage will be provided on site to ensure waste management measures are communicated across the site, particularly for contractors and visitors who are not regularly on site. Signage will highlight correct procedures for separating wastes where required, locations of bins and waste storage areas, labelling of designated bins, potential hazards associated with the waste streams and handling, and contact details should any issues be encountered.

Signage will be prepared and located on site in accordance with the Australian Standard (AS 1319) *Safety Signs for the Occupational Environment*, and the NSW EPA and Australian Standard for recycling signage.

## 5.7 Monitoring and Reporting

The activities outlined in **Table 5-8** below are required to be undertaken by the General Contractor/Principal Contractor to inform the onsite waste management process.

**Table 5-8: Monitoring and Reporting Activities and Frequencies**

| Activity                                                                                                                                                                                                                          | Frequency                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| Ensure waste quantities generated are recorded, including tracking of receipts from waste recycling or disposal via the appointed waste contractor. Ensure retention of tipping dockets and produce them to Council upon request. | Ongoing throughout construction |
| Record waste classification and any potential testing results.                                                                                                                                                                    | Ongoing throughout construction |
| Review the WMP in light of any changes to construction activities or further information which may alter waste management practices.                                                                                              | Ongoing throughout construction |
| Undertake visual inspections to ensure waste management controls are implemented and maintained across the site.                                                                                                                  | Daily                           |
| An incident register must be maintained on-site at all times and should include the contact details of SafeWork NSW as well as the 24-hour EPA Pollution line.                                                                    | Daily                           |
| Implementation of enough waste disposal bins for the needs of the project.                                                                                                                                                        | Ongoing throughout construction |
| Outcomes of audits and waste tracking will be reported to the Principal Contractor, potentially through monthly reporting to ensure waste management objectives are adhered to.                                                   | Monthly                         |

|                                                                                                                                                                                                                                                     |                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| Undertake final review of the WMP upon project completion to ensure information accurately reflects site activities, and to assist future waste management.                                                                                         | At project completion           |
| Inspect the site 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 | Ongoing throughout construction |

## 5.8 Corrective Action

Where formal auditing, daily visual inspections or incident reporting identify incorrect storage or disposal procedures, or maintenance or waste management issues, observations will be promptly reported to the Construction Site Manager and recorded. The Construction Site Manager will determine appropriate measures to rectify the issues in a timely manner in consultation with the Environmental Management Representative and Health and Safety Manager where required.

## 6. References

Council, C., 2019. *Camden Development Control Plan 2019*, s.l.: s.n.

Council, C., 2019. *Waste Management Guideline*, s.l.: s.n.

DPE, 2018. *Turner Road Precinct - Development Control Plan January 2018*, s.l.: Department of Planning and Environment.

EPA, 2014. *NSW Waste Classification Guidelines*, s.l.: Environment Protection Authority NSW.

EPA, 2017. *NSW Waste Avoidance and Resource Recovery Strategy Progress Report 2014-15*, s.l.: NSW EPA.

EPA, 2020. *Construction and demolition waste: A management toolkit*, s.l.: NSW Environment Protection Authority.

## 7. Limitations

### Scope of services

This report ("the report") has been prepared by JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

### Reliance on data

In preparing the report, JBS&G has relied upon data and other information provided by the Client and other individuals and organisations, most of which are referred to in the report ("the data"). Except as otherwise expressly stated in the report, JBS&G has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report ("conclusions") are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. JBS&G has also not attempted to determine whether any material matter has been omitted from the data. JBS&G will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to JBS&G. The making of any assumption does not imply that JBS&G has made any enquiry to verify the correctness of that assumption.

The report is based on conditions encountered and information received at the time of preparation of this report or the time that site investigations were carried out. JBS&G disclaims responsibility for any changes that may have occurred after this time. This report and any legal issues arising from it are governed by and construed in accordance with the law as at the date of this report.

### Environmental conclusions

Within the limitations imposed by the scope of services, the preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted environmental consulting practices. No other warranty, whether express or implied, is made, including to any third parties, and no liability will be accepted for use or interpretation of this report by any third party.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

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## Appendix A    Stockpile locations and Waste Storage Areas



#### Legend

- Approximate Site Boundary
- NSW Cadastre
- Hydro Line
- Site Features**
- Construction Site Access Points
- Wash Down Bay
- Site Compound
- Stockpile Area
- Waste Area



Job No: 69307

Client: FDC Construction

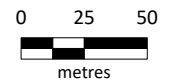
Version: R07\_8 Rev A

Date 20/03/2026

Drawn By: RF

Checked By: ER

Scale 1:3,000



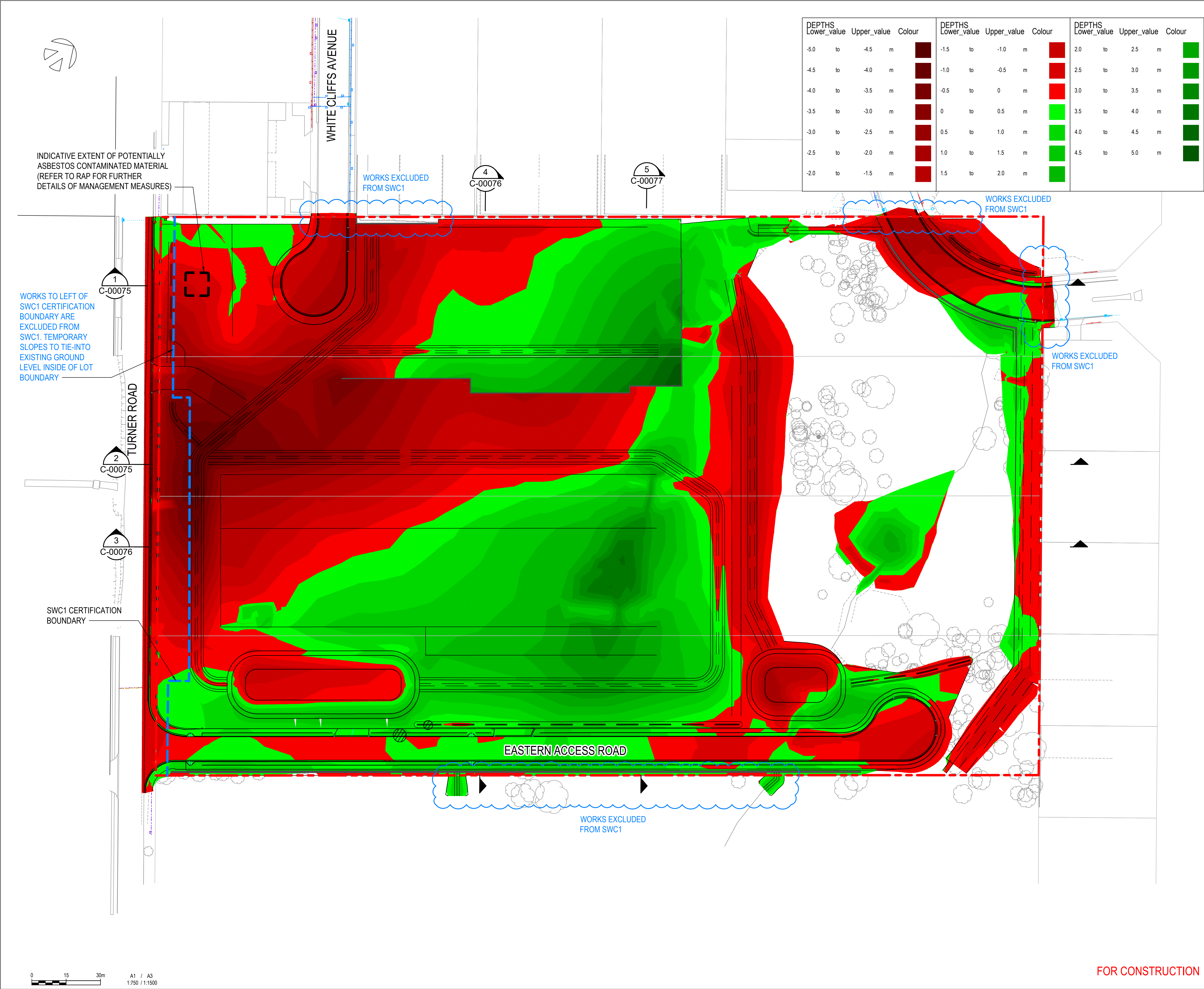
Coord. Sys. GDA2020 MGA Zone 56

**43, 49, 55, 61 and 67 Turner Rd  
Gregory Hills, NSW**

#### SITE LAYOUT

**FIGURE 1**

## Appendix B    Cut and Fill Plan



| DEPTHS      |             |        |   | DEPTHS      |             |        |   | DEPTHS      |             |        |   |
|-------------|-------------|--------|---|-------------|-------------|--------|---|-------------|-------------|--------|---|
| Lower_value | Upper_value | Colour |   | Lower_value | Upper_value | Colour |   | Lower_value | Upper_value | Colour |   |
| -5.0        | to          | -4.5   | m | -1.5        | to          | -1.0   | m | 2.0         | to          | 2.5    | m |
| -4.5        | to          | -4.0   | m | -1.0        | to          | -0.5   | m | 2.5         | to          | 3.0    | m |
| -4.0        | to          | -3.5   | m | -0.5        | to          | 0      | m | 3.0         | to          | 3.5    | m |
| -3.5        | to          | -3.0   | m | 0           | to          | 0.5    | m | 3.5         | to          | 4.0    | m |
| -3.0        | to          | -2.5   | m | 0.5         | to          | 1.0    | m | 4.0         | to          | 4.5    | m |
| -2.5        | to          | -2.0   | m | 1.0         | to          | 1.5    | m | 4.5         | to          | 5.0    | m |
| -2.0        | to          | -1.5   | m | 1.5         | to          | 2.0    | m |             |             |        |   |

- NOTES:
- FOR GENERAL LEGEND REFER DRAWING NO. [SYD091-ARP-00-02-DR-C-00003](#).
  - FOR GENERAL NOTES REFER DRAWING NO. [SYD091-ARP-00-02-DR-C-00005](#) TO C-00007.
  - EARTHWORKS VOLUMES ASSUME A 200 mm THICK TOPSOIL STRIP ACROSS THE SITE.
  - EARTHWORKS ASSESSMENT IS A COMPARISON BETWEEN STRIPPED LEVEL AND PROPOSED FORMATION LEVEL.
  - EARTHWORKS ASSUMES 750 mm THICK PAVEMENT BOX AND 200 mm THICK TOPSOIL/GRANULAR LAYER \* AS FINISHED SURFACE FOR MAIN PLATFORM.
  - CONTRACTOR IS TO REFER TO "REMEDIAL ACTION PLAN, 43-61 TURNER ROAD, GREGORY HILLS, NSW 2257" BY ARCADIS AND UNDERTAKEN REMEDIAL WORKS FOR CONTAMINATED SOILS IN ACCORDANCE WITH THIS DOCUMENT.
  - CONTRACTOR IS TO REFER TO "SOIL SALINITY MANAGEMENT PLAN, 43-61 TURNER ROAD, GREGORY HILLS, NSW 2257" BY GEO-LOGIX AND COMPLETE EARTHWORKS IN ACCORDANCE WITH SITE SPECIFIC SALINITY MANAGEMENT GUIDELINES CONTAINED IN THIS DOCUMENT.
  - CONTRACTOR TO REFER TO JK REPORT 37220PNrpt "SUPPLEMENTARY GROUND INVESTIGATION FOR PROPOSED DATA CENTRE AT 43-61 TURNER ROAD" FOR DETAILS ON SUBGRADE PREPARATION.
  - EARTHWORKS BALANCES MAKES ALLOWANCE FOR OFF-SITE DISPOSAL OF ASBESTOS CONTAMINATED MATERIAL = 1750 m<sup>3</sup> (50% OF POTENTIAL VOLUME INDICATED WITHIN SECTION 7.1 OF THE RAP).
  - EARTHWORKS BALANCE MAKES ALLOWANCE FOR OFF-SITE DISPOSAL OF GEOTECHNICALLY UNSUITABLE MATERIAL WITHIN FOOTPRINT OF FARM DAMS.

|                         |         |
|-------------------------|---------|
| TOTAL CUT               | -49,716 |
| TOTAL FILL              | 39,527  |
| TOTAL BALANCE           | -10,188 |
| EXCESS OF CUT OVER FILL | 10,188  |

TOPSOIL STRIP - 12,000 m<sup>3</sup>  
(NOT INCLUDED IN CUT VOLUME)

\* COMPACTED GRANULAR FILL FINISH MAY BE OMITTED SHOULD MAIN WORKS CC1 BE ISSUED PRIOR TO CONSTRUCTION OF BULK EARTHWORKS AND THE FINISHED LEVEL OF BULK EARTHWORKS ADJUSTED TO SUIT THE PROPOSED BUILDING PAD

| REV | DATE    | DESCRIPTION                    | DRN | ENG | CHK | APP |
|-----|---------|--------------------------------|-----|-----|-----|-----|
| A   | 10JAN25 | DESIGN DEVELOPMENT             | PDA | VEK | EM  | EM  |
| B   | 10FEB25 | CONSTRUCTION DOCUMENTS         | PDA | VEK | EM  | EM  |
| C   | 28FEB25 | UPDATED CONSTRUCTION DOCUMENTS | PDA | VEK | EM  | MR  |
| D   | 27NOV25 | CONSTRUCTION CERTIFICATE       | PDA | EM  | EM  | MR  |
| 1   | 16DEC25 | SUBDIVISION WORKS CERTIFICATE  | PDA | ERA | EM  | RA  |

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PROJECT: SYD091

TITLE:  
BULK EARTHWORKS PLAN  
CUT AND FILL ANALYSIS

DRAWING:  
SYD091-ARP-00-02-DR-C-00070

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