



**Project:**

135 Badgerys Creek Road, Bradfield

**Company:**

BRADFIELD CORPORATION PTY LTD

**Construction, Operation and Staging Plan**



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**Project Name** Bradfield Project

**Project Number** 202403

**Site Address** 135 Badgerys Creek Road, Bradfield NSW

**Date** 13th October 2025

**Prepared By** Creative Vision Corporation Pty Ltd  
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**Revision History and Issue Details – 135 Badgerys Creek, Bradfield**

<b>DATE</b>	<b>REV</b>	<b>DETAILS</b>	<b>PREPARED BY</b>	<b>AUTHORISED BY</b>
05.09.2025	1	CMP – Internal Review	S.F	D.K
17.09.2025	2	CMP – EU Review	S.F	D.K
3.10.2025	3	CMP – Amendment	S.F	D.K
13.10.2025	4	CMP – Final	S.F	D.K

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## **1. Introduction**

This Construction, Operation and Staging Plan has been prepared on behalf of the Bradfield Corporation Pty Ltd (the Applicant) by Creative Vision. It is submitted to the Department of Planning, Housing and Infrastructure (DPHI) in support of a State Significant Development Application (SSDA) on land at 135 Badgerys Creek Road, Bradfield (the site).

This report outlines the management of construction and operational activities, including measures to avoid, minimise, and mitigate potential impacts. It also provides a detailed description of existing and proposed operations, covering patron capacity, hours of operation, lighting and illumination, and the nature of anticipated events. The document has been prepared in response to the Secretary's Environmental Assessment Requirements (SEARs) issued for the project, as referenced in Section 1.4.

## **2. Site Description**

The site is located at 135 Badgerys Creek Road, Bradfield and is approximately 2.02ha in area. It is legally described as Lot 7 DP 243457 and is located approximately 250m to the future Bradfield Metro Station and 4km to the Western Sydney Airport. An aerial image of the site is provided in Figure 1.

The site shares a western frontage with Badgerys Creek Road. The eastern boundary of the site adjoins the State government-led Bradfield City Centre which is set to be a vibrant 24/7 global city, driving advancements in industry and will support 10,000 more homes and 20,000 new jobs in Western Sydney.

As defined by the Aerotropolis Precinct Plan, the site is located within the Aerotropolis Core Precinct which is envisioned as an attractive place for workers, residents and visitors. The Aerotropolis Core Precinct will leverage the positive economic impact of the adjacent Western Sydney Airport and Bradfield City Centre. It will attract business hubs, research and development, professional services and creative industries in addition to providing residential development within walking distance of the Bradfield Metro station and proximity to blue and green infrastructure.



**Figure 1 Site Aerial Map**

Source: Nearmap / edited by Ethos Urban

### 3. Proposed Development

The proposed development will seek consent for the redevelopment of the site, comprising:

- Enabling works including vegetation removal and earthworks;
- The construction of three buildings, comprising:
  - Residential use, including approximately 400 apartment units;
  - Hotel use, including approximately 450 hotel rooms;
  - Commercial use, including supermarket, food and drink and other commercial uses;
  - Medical centre use;
  - Childcare centre use;
- Construction of two basement structures, including approximately 800 carparking spaces;
- Public domain upgrades, including:
  - Construction of an internal road;
  - A public plaza;
- Rehabilitation and augmentation of the existing riparian corridor;
- Landscaping embellishments on the ground level and within the built form; and

- Services augmentation as required.

Refer to the Environmental Impact Statement for a detailed summary of the proposed development.

#### 4. Secretary's Environmental Assessment Requirements

In accordance with section 4.39 of the Environmental Planning & Assessment Act 1979 (EP&A Act), Secretary's Environmental Assessment Requirements (SEARs) for SSD 77458970 were issued on 30 January 2025. This report has been prepared to respond to the relevant issued Secretary's Environmental Assessment Requirements (SEARS), as set out in the table below.

SEARs Request	Response / Location in report
2. Employment Provide an estimate of the retained and new jobs that would be created during the operational phases of the development, including details of the methodology to determine the figures provided.	Section 8 h
24. Construction, Operation and Staging	
Provide details of existing (if relevant) and proposed operations, including patron capacity, hours of operation, lighting and illumination, and typical events to be held.	Section 2
If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.	Section 3 & Appendix A
Address the requirements listed in SEARs advice Liverpool City Council (LCC) dated 8 January 2025, by LCC.	Section 4
Address the requirements listed in SEARs advice Commonwealth Department of Infrastructure, Transport, Regional Development, Communications (Western Sydney Airport Regulatory Policy) and the Arts dated 10 January 2025, by Western Sydney Airport Regulatory Policy.	Section 5

#### 5. Proposed Operational Framework

This is a preliminary document prepared for planning purposes; each tenant will be required to prepare and submit their own detailed Plan of Management addressing use specific operations. The mixed-use development at 135 Badgerys Creek Road, Bradfield, is designed to integrate residential, hotel, and commercial functions, creating a vibrant and self-sustaining precinct within the Aerotropolis Core. The operational details are outlined below, with indicative capacities and hours based on preliminary studies and general industry best practices where precise figures are not yet defined.

## 5.1 Proposed Operations

- **Residential Accommodation:** The development comprises 402 apartment units with a total Gross Floor Area (GFA) of 41,707 m<sup>2</sup>. The apartments will feature a mix of 1-bedroom (13%), 2-bedroom (69%), and 3-bedroom (18%) units, catering to key workers, families, and young couples with market housing options.
- **Retail:** Approximately 3,064 m<sup>2</sup> of GFA is dedicated to retail, including fine-grain shops designed to attract pedestrian traffic and larger anchor retail at the centre of the site. Retail frontages and lobby entrances are strategically positioned along main streets and key open spaces to promote activation and vibrancy.
- **Supermarket:** A 1,501 m<sup>2</sup> GFA supermarket will serve the local community and residents.
- **Hotel:** The hotel spans 17,391 m<sup>2</sup> GFA, offering 445 keys (rooms) along with a restaurant, lounge areas, café, bar, gym and fitness centre, conference and meeting rooms, and a reception area.
- **Coworking Spaces:** Covering 1,101 m<sup>2</sup> GFA, these spaces will operate 24/7, providing flexible working environments for various professionals, including those associated with Western Sydney Airport.
- **Childcare Centre:** The childcare facility features 779 m<sup>2</sup> of indoor space and 687 m<sup>2</sup> of outdoor play area, accommodating approximately 90 children.
- **Medical Centre:** A 1,913 m<sup>2</sup> GFA medical centre will provide GP, dental, physiotherapy, specialist consultations, and pathology services, supporting both residents and the surrounding community.
- **Commercial Space:** The development includes 1,095 m<sup>2</sup> GFA of Commercial Space.
- **Gym:** A dedicated 887 m<sup>2</sup> GFA gym facility will be available for residents and visitors.
- **Tavern:** The development incorporates a 1,259 m<sup>2</sup> GFA tavern for social and recreational use.
- **Communal Areas:** Comprising 6,742 m<sup>2</sup> GFA, or 33.3% of the total site area, communal spaces are distributed across multiple levels, including podium and upper tower gardens, social terraces, pools, and outdoor play areas. Ground-level features include the Riparian Corridor of Gung Gung Creek, Gateway Plaza, pedestrian laneways, and eat-street environments, creating vibrant public realms.
- **Parking:** Three basement levels provide 775 car parking spaces, including EV charging bays, as well as bicycle and motorcycle parking facilities.

## 5.2 Patron Capacity

The Patron Capacity has been derived from the summary of floor areas and relevant populations set out in the BCA report. Populations exclude BOH, staff, and administration areas.

For most non-residential uses, population numbers have been derived from the BCA report where the patron capacity is calculated in accordance with Table D2D18 (previously Table D1.13) of the BCA. Where applicable, Clause D2D18(c) permits the use of other suitable measures of assessing capacity; these have been applied where appropriate and are noted in the Assumption column. Where seating plans are available, these have been used in lieu of Table D2D18.

<b>Component</b>	<b>Estimate (range)</b>	<b>Assumption</b>
<b>Residential</b>	~850 – 1,100 residents	Residential calculation uses persons per unit assumptions Based on 2.1 – 2.7 persons per dwelling × 402 units. This is a resident population (people living in dwellings).
<b>Hotel (guests)</b>	~650 guests	Based on 75% Occupancy of the rooms at any given stage and considering double occupancy for all Rooms
<b>Hotel (amenity visitors)</b>	~275 visitors	For restaurants, bars, lounges, reception and other public hotel areas.
<b>Conference Room</b>	~457	Based on Floor Area (BCA report)
<b>Tavern</b>	~400	Based on Seating arrangement
<b>Retail (incl. F&amp;B)</b>	~488	Daily footfall varies widely by time of day, events and anchors. Based on Floor area (BCA report)
<b>Supermarket</b>	~434	Anchor supermarket contributes materially to daily footfall; Based of Floor area (BCA report)  This adjusted floor area included only the areas available for patrons and at a reduced area of 30% to take into account for shelving and racking (or the like).
<b>Co-working</b>	~100	Assumed, Capacity depends on fit-out (hot desk vs dedicated desks).
<b>Childcare centre</b>	~95 ~110 children	Based on the Childcare Capacity
<b>Gym</b>	~200	Based on floor area (BCA report)
<b>Medical centre</b>	180~200patients	Based on floor area of 1834 sqm assuming 10 per sqm
<b>Commercial</b>	~100	Based on floor area of 1046 sqm assuming 10 per sqm

### 5.3 Hours of Operation

The diverse nature of the mixed-use development necessitates varied hours of operation to cater to different user groups and maximize activation. The proposed hours are based on typical industry standards for similar facilities:

- Residential: 24 hours, 7 days a week.
- Hotel: 24 hours, 7 days a week (front desk and guest services).
- Hotel amenities (restaurants, bars): Indicative hours 7:00 am to 10:00 pm, Monday to Saturday, and 7:00 am to 8:00 pm on Sundays and public holidays, consistent with the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008. Each tenant will apply for approval of their specific hours of operation at the time of fit-out.
- Supermarket: Typically, 7:00 am to 10:00 pm, 7 days a week.
- Retail / Commercial (General): Indicative hours 7:00 am to 10:00 pm, Monday to Saturday, and 7:00 am to 8:00 pm on Sundays and public holidays, consistent with the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008. Each tenant will apply for approval of their specific hours of operation at the time of fit-out.
- Medical Centre: 8:00 am to 6:00 pm, Monday to Sunday.
- Food & Beverage (stand-alone): Varied. Cafés typically open from 6:00 am, while restaurants and bars may trade until late evening (e.g. 11:00 pm–1:00 am), subject to individual approvals.
- Gym: Member access 24/7. Staffed hours: 8:00 am to 8:00 pm, Monday to Friday, and 8:00 am to 5:00 pm on weekends.
- Commercial Offices: Typically 7:00 am to 7:00 pm, Monday to Friday.
- Co-working Spaces: Potentially 24 hours, 7 days a week, to support flexible work schedules and airport-related activities.
- Childcare Centre: Standard hours, typically 7:00 am to 6:00 pm, Monday to Friday.

## 5.4 Lighting and Illumination

Lighting and illumination will be designed to enhance safety, amenity, and visual appeal while minimizing environmental impacts, particularly concerning aviation safeguarding requirements. The design will adhere to relevant Australian Standards and the Western Sydney Aerotropolis Development Control Plan (DCP).

**Public Domain & Pedestrian Pathways:** All public domain areas and pedestrian pathways will be well lit, with luminaires designed and installed in accordance with Australian Standard AS4282:1992 – Control of the Obtrusive Effects of Outdoor Lighting.

High-quality, energy-efficient LED fixtures will be used throughout the N-S Open Street, pedestrian pathways, and the public plaza. These will include:

- Downlighting: The dominant approach, ensuring safe navigation while minimising light trespass into residential areas and natural habitats.
- Accent Uplighting (limited use): Uplighting will only be employed selectively for trees, public art, or wayfinding features. Where used, fittings will be carefully shielded and angled to prevent uncontrolled upward light and minimize light spill onto adjacent residential areas and natural habitats.



1. Towards metro to Sydney CBD
2. To residential neighbourhoods
3. To future sports field

**Figure 2 Pedestrian Pathways**

Source: PLUS Architectural Design Report

Internal and Ancillary Areas: Future lighting structures throughout the development will provide adequate illumination for:

- Public domain areas
- Pathways
- Building lobbies
- Lift and stair cores
- Mail rooms
- Ancillary residential areas

Additionally, lighting will be provided to spaces between buildings, building entrances, basement levels, and other key external areas to allow facial recognition, improve security, and deter anti-social behaviour.

**Building Illumination:** Façade lighting will be integrated into the architectural design to highlight key features and contribute to the precinct's night-time identity. This will be carefully controlled to prevent glare and light pollution.

**Smart Lighting Systems:** Implementation of smart lighting technologies will allow for adaptive illumination based on occupancy, time of day, and natural light levels, optimizing energy consumption and enhancing user experience. This aligns with the broader Aerotropolis vision for smart city infrastructure

**Aviation Safeguarding:** All external lighting, including façade and public domain uplighting will comply with NASF Guideline E: Pilot Lighting Distraction.

- Downlighting will be prioritised to minimise skyward light.
- Uplighting will be limited to controlled architectural or landscape features, with shielding and low-angle beam distribution to prevent upward glare.
- The site is outside WSI's Zones A–D but within the 6 km assessment radius, meaning CASA review will be required to ensure no lighting poses a distraction or hazard to aircraft.

## **5.5 Cleaning and Maintenance of Communal area**

Cleaning & Maintenance Manual for common property will be handed to the Owners Corporation (Strata) in accordance with the Strata Schemes Management Act 2015, including asset registers, service levels/frequencies, and safe-work methods. The Owners Corporation will appoint a strata manager and a building/facilities manager to act for all owners, procuring and supervising contractors to clean and maintain communal areas—lobbies, corridors, amenities, lifts, car parks, landscaping, lighting, waste rooms, stormwater systems, CCTV and access control—per the developer's recommendations and O&M manuals. A preventive maintenance program and capital works plan will operate with KPIs, audit checklists, escalation/defect pathways, and warranty tracking, with performance and budgets reported regularly to the Strata Committee.

## **5.6 Safety and Security**

A comprehensive safety and security strategy will be implemented, including 24/7 CCTV coverage of all common areas, including loading docks, basements, concierge zones, non-residential outdoor spaces, and through-site links, with discrete cameras and minimal coverage blackspots. CCTV will be integrated with external and internal lighting systems designed to comply with Australian Standard AS4282:1992, ensuring facial recognition is achievable under all conditions. Additionally, CCTV signage will be displayed to inform the public of ongoing surveillance, and all security systems will undergo regular maintenance and periodic CPTED reviews to ensure continued effectiveness. Access control measures, including secure resident swipe-card access to basements, mail rooms, and amenity areas, will be designed to avoid a fortress-like appearance, complemented by bollard or barrier systems at key pedestrian-vehicular interfaces to prevent unauthorized vehicle access. The development will incorporate territorial reinforcement through highly visible entrances, routine security patrols of the

site, and clear demarcation of public and private areas using passive boundaries such as landscaping and material changes rather than high fencing. Signage will guide pedestrian movements and discourage loitering in undesignated areas, while pathways and internal corridors will remain unobstructed to maintain safety.

Specialist CPTED consultants have been engaged, and their recommendations on lighting, sightlines, access control, and passive surveillance will be incorporated into detailed design and operational procedures. Ongoing management will include maintenance of all security systems and periodic CPTED reviews to ensure sustained compliance and effectiveness.

## **5.7 Evacuation Procedure**

An emergency evacuation plan will be established in accordance with AS 3745 and relevant NSW WHS and Building Code requirements. The plan will define warden roles, alarm and PA protocols, accessible egress, designated assembly areas, and Personal Emergency Evacuation Plans (PEEPs) for occupants who need them. Evacuation diagrams and signage will be provided at strategic locations, with regular drills, staff training, contractor inductions, and post-exercise reviews to ensure continuous improvement. Egress paths, emergency lighting, and will be inspected and maintained to remain unobstructed and fully operational at all times.

## **6. Staging and Management**

The development is proposed to be constructed in three stages. This phased approach allows for adaptive development, responsive to market demand and infrastructure delivery. The construction and operation of each stage will be carefully managed to mitigate potential impacts.

### **6.1 Construction Staging Plan**

Innovation South Road will be established in 2026 as confirmed in consultations with the BDA. The development will occur in 3 stages. Construction vehicle access arrangements will be confirmed by the appointed contractor for each stage of the development. However, given the Aerotropolis DCP restrictions on access to Badgerys Creek Road, it is anticipated that construction vehicle access across all three stages will be mostly via Innovation South and/or Central Loop West, both of which are currently under construction as part of the Bradfield City Centre works managed by SMEC. Prior to the commencement of construction, all necessary safety and accessibility measures will be incorporated and implemented in line with the Construction Traffic Management Plan. All loading would take place internal to the construction site or within any approved on-street work zones. The construction program would be managed with respect to surrounding construction projects such as the WSA, Bradfield Metro Station, M12 Motorway, and other private developments to ensure that any impacts of the project are minimised.

The extent, location, and operational times of construction vehicle access will be finalised in consultation with relevant stakeholders and documented in the Construction Pedestrian and Traffic Management Plan (CPTMP) during detailed design stage.

***Stage 1: Hotel, Tavern, Plaza on the Eastern side of site***

Precautions:

- Temporary hoarding around construction zones along the Plaza
- Pedestrian diversion routes clearly signed
- Safety signage and barriers to separate construction from public areas

***Stage 2: Hotel, Supermarket/retail Commercial, Childcare, Medical centre, Co-working spaces Residential, Proposed N-S internal Street***

Precautions:

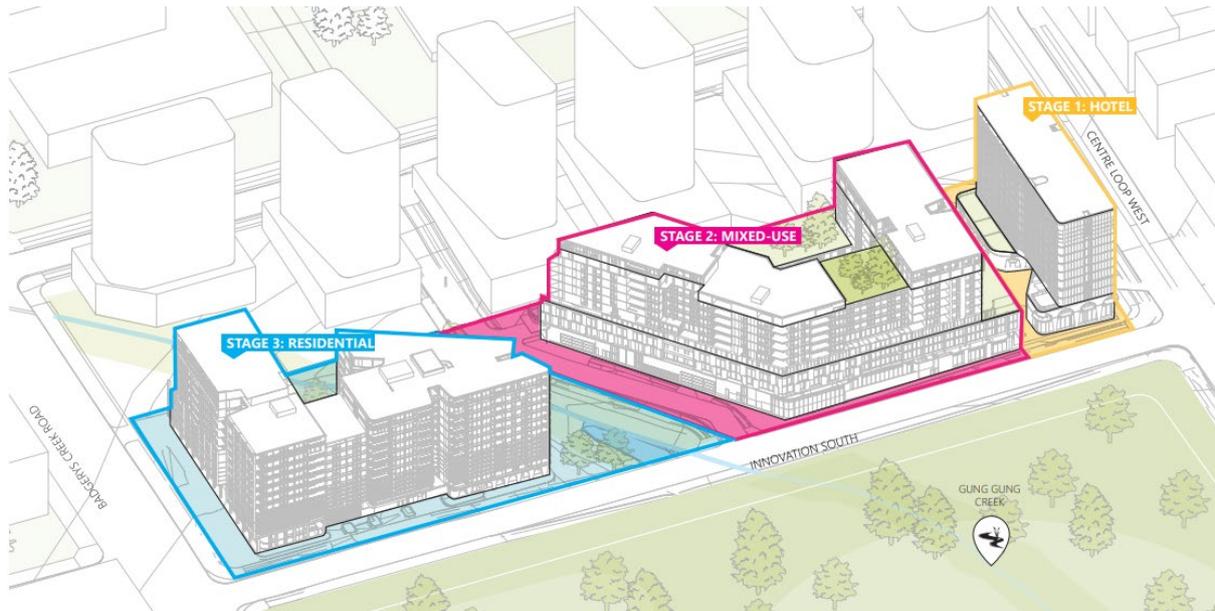
- Hoarding along internal street and site perimeters to protect residents and pedestrians
- Controlled construction vehicle entry points
- Safety audits before public access to adjoining areas
- Clear demarcation of pedestrian and cyclist paths adjacent to construction zones

***Stage 3: Ground Floor Café, Residential, Communal facilities, Public Domain surrounding Creek***

Precautions:

- Protective hoarding around residential and public domain areas
- Temporary fencing around creek for environmental and public safety
- Warning signage for ongoing construction and restricted areas
- Coordination of communal facilities access to minimize risk to workers and future residents

Stage 1 includes the substructure, associated earthworks, and superstructure, all completed as part of the initial package. A similar approach will be applied to Stages 2 and 3, ensuring each stage remains structurally independent during construction. Once the basement of Stage 2 is completed, the shoring wall separating Stage 1 and Stage 2 will be carefully demolished. This will enable seamless movement of vehicles and equipment across the basements, maintaining functional connectivity between stages while ensuring safety and structural stability during the transition.



Stage 1 – Yellow  
 Stage 2 – Pink  
 Stage 3 – Yellow

**Figure 3 Staging Plan**

Source: PLUS Architectural Design Report

## 6.2 Operational Phase Access Strategy

### **Post Completion of Stage 1**

- Non-residential vehicular access via Centre Loop West.
- Pedestrian access via Centre Loop West or Innovation South.
- Hoarding in place to direct pedestrian and vehicular movement safely around ongoing Stage 2 construction zones.

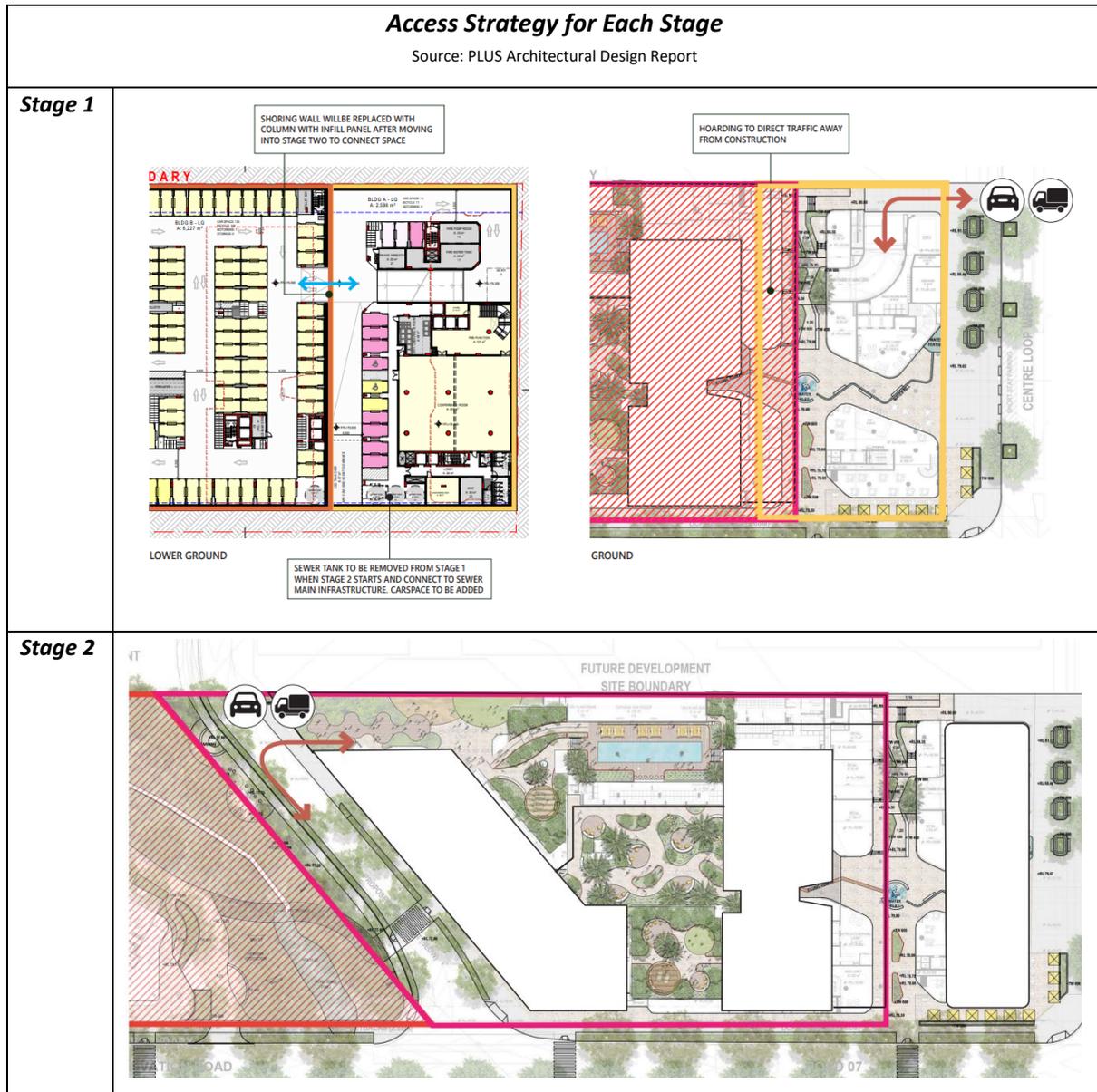
### **Post Completion of Stage 2**

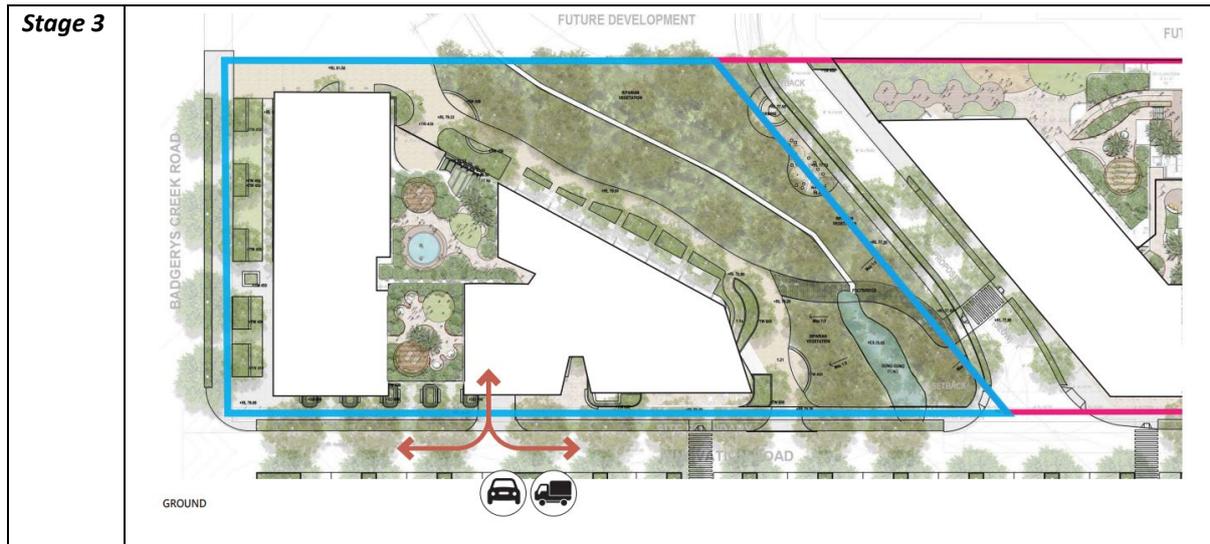
- Residential vehicular access via Innovation South.
- Non-Residential access via Centre Loop West
- Pedestrian access through the connecting thoroughfare between Stage 1 and Stage 2 entry points (via Centre Loop West) or via Innovation South
- Hoarding in place to manage pedestrian movement safely around Stage 3 construction zones.

### **Post Completion of Stage 3**

- Full Vehicular Access for Stage 1 and Stage 2 (Non – Residents) via Centre loop west
- Full Vehicular Access for Stage 1 and Stage 2 (Residents) via Innovation South

- Full vehicular access (Residential and Non-Residential) for Stage 3 via Innovation South.
- Pedestrian access via Badgerys Creek Road, Innovation South, and Centre Loop West, with additional access provided through the new north-south internal road and bridge connection.





The Bradfield development will be delivered in three stages, each with a construction duration of approximately 24 months. Temporary structures, such as cranes, expected to exceed the Obstacle Limitation Surface (OLS). In accordance with the procedures outlined in the Aviation Safeguarding Assessment, all necessary measures and approvals will be obtained prior to the commencement of construction. Crane dismantling and building reaching milestones are aligned with the overall schedule, ensuring a coordinated and sequential delivery of the project. These dates are indicative only and will be reviewed closer to the start of construction. Should any changes to the controlled activity approvals be required, they will be communicated to all relevant authorities to ensure updated approvals are issued.

BRADFIELD CONSTRUCTION STAGING TIMELINE							
	Construction Start date	Crane Erection	Crane Reaching (126.AHD)	Crane Dismantle	Building Reaching (126.AHD)	Construction Completion date	Duration
<b>STAGE 1</b>	Sep 2027	Dec 2027	Dec 2027	Jun 2029	NA	Sep 2029	24 months
<b>STAGE 2</b>	Oct 2028	Jan 2029	Jan 2029	Jul 2030	NA	Oct 2030	24 months
<b>STAGE 3</b>	Nov 2029	Feb 2030	Feb 2030	Aug 2031	NA	Nov 2031	24 months

### 6.3 Construction Management and Impact Mitigation

An Integrated Management Plan (IMP) has been developed for the construction of the development. Refer to **Appendix A** for the IMP, which includes an Environmental Management Plan and outlines key elements of the Traffic Management Plan prepared by ASON. The IMP should be read alongside the Construction Traffic Management Plan (CTMP) prepared by ASON, dated 10<sup>th</sup> October 2025.

Requirements for airport safeguarding and airspace protection, as set out in the authority letter from the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications, and the Arts, have been addressed in the Aviation Safeguarding Assessment

prepared by AVLAW, dated 1<sup>st</sup> October 2025. While permanent structures do not penetrate the Obstacle Limitation Surfaces (OLS) referenced in Section 6 of the AVLAW report, luffing jib cranes, with heights ranging from 185.04 m AHD to 188.01 m AHD, will temporarily extend above the OLS.

Aviation stakeholders, including WSI, CASA, Airservices Australia, and the Department, will participate in the controlled activity approval process to confirm whether the proposed permanent and temporary structures at the site meet regulatory requirements.

#### **6.4 Operational Management and Impact Mitigation**

Operational management will focus on ensuring the long-term sustainability, safety, and amenity of the mixed-use development. Key operational management and impact mitigation strategies include:

- Operational Management Plan will be developed by each of the operators to coordinate the various operational aspects of the residential, hotel, and commercial components. This will cover facility management, security, cleaning, and maintenance.
- Waste Management: Ongoing operational waste management will include separate collection systems for recycling, organic waste, and general waste, promoting high recycling rates and efficient waste disposal. Servicing arrangements will be designed to minimize disruption to residents and public spaces. The Operational Waste Management Plan (OWMP) has been prepared by Elephants Foot, dated 9<sup>th</sup> October 2025.
- Noise Management: Operational noise from mechanical plant, commercial activities, and public spaces will be managed through design (e.g., acoustic treatments, appropriate equipment selection) and operational controls (e.g., hours of delivery, event management protocols) to comply with relevant noise guidelines and the acoustic report prepared by Acoustic Logic dated 7<sup>th</sup> October 2025 and protect residential amenity.
- Traffic and Parking Management: A comprehensive operational traffic and parking management plan will ensure efficient vehicle and pedestrian flow, adequate parking provision, and safe access for all users. This will include strategies for managing peak event traffic and promoting sustainable transport modes.
- Lighting Management: Ongoing management of lighting systems will ensure optimal illumination levels, energy efficiency, and continued compliance with aviation safeguarding requirements. Regular maintenance and monitoring will be undertaken.
- Security and Safety: Robust security systems, including CCTV surveillance, access control, and on-site security personnel, will be implemented to ensure the safety and security of residents, guests, and visitors across all components of the development.
- Environmental Monitoring: Regular monitoring of environmental parameters, such as air quality, noise levels, and water quality, will be conducted to ensure ongoing compliance with environmental regulations and identify any potential issues.

## 7. Hotel Operation Plan

The Hotel Operation Plan will be developed by the hotel operator, and will outline the management and operational strategies for the hotel component of the mixed-use development at 135 Badgerys Creek Road, Bradfield. The hotel is a key element of the precinct, designed to support tourism, business travellers, and the 24/7 economy of the Western Sydney Aerotropolis.

### 7.1 Hotel Overview

- **Operator:** Negotiations are underway with major hotel groups, to develop a dual-branded hotel. This approach ensures that a high-quality, internationally recognized brand will operate the facility.
- **Capacity:** The hotel will comprise approximately 445 rooms across two buildings. Building A, part of Stage 1, is scheduled to commence construction in 2027 and will feature 243 rooms for a 4.5-star hotel. Building B, part of Stage 2, is planned to begin construction in 2029 and will offer 202 rooms for a 3.5-star hotel, catering to a range of guest segments. The total Gross Floor Area (GFA) will be 17,391 m<sup>2</sup>. The development will also include ancillary facilities such as restaurants, bars, conference and meeting rooms, and fitness amenities.
- **Target Market:** The hotel will serve a diverse range of guests, including:
  - Business travellers and airline crews associated with Western Sydney International (WSI) Airport.
  - Visitors and professionals engaged with the Bradfield City Centre and its advanced manufacturing and research facilities.
  - Tourists visiting the Western Parkland City.
  - Attendees of events and conferences held within the hotel or the surrounding precinct.

### 7.2 Hours of Operation

- **Guest Services (Front Desk, Concierge):** 24 hours, 7 days a week.
- **Restaurants and Bars:** Flexible hours, typically from 6:00 AM for breakfast service to late evening (e.g., 11:00 PM - 1:00 AM) for dinner and bar service.
- **Conference and Event Spaces:** As required for bookings, with potential for 24-hour operation for specific events.
- **Fitness Centre:** 24 hours, 7 days a week for hotel guests.
- **Room Service:** 24 hours, 7 days a week.

### 7.3 Staffing and Management

- **Management Structure:** A dedicated hotel management team will be responsible for the day-to-day operation of the hotel, including a General Manager, Operations Manager, and heads of departments (e.g., Front Office, Housekeeping, Food & Beverage).
- **Staffing Levels:** Staffing will be commensurate with a 4-star hotel of this size, with recruitment focusing on providing employment opportunities for the local community. Staff will be trained in customer service, safety, and emergency procedures.

### 7.4 Guest Services and Amenities

- **Check-in/Check-out:** Efficient and seamless check-in/check-out processes, including options for mobile check-in.
- **Concierge Services:** A full-service concierge will be available to assist guests with transportation, tour bookings, and local information.
- **Food and Beverage:** A range of dining options will be available, from casual cafes to formal restaurants, catering to diverse tastes and dietary requirements.
- **Business and Conference Facilities:** State-of-the-art conference and meeting rooms will be equipped with the latest audio-visual technology to host a variety of corporate and social events.
- **Wellness Facilities:** A well-equipped fitness centre and potentially other wellness amenities will be available for guests.

### 7.5 Safety and Security

- **Access Control:** Key card access will be required for guest rooms, elevators, and other secure areas.
- **Surveillance:** CCTV cameras will be installed in all public areas, monitored 24/7 by security personnel.
- **Emergency Procedures:** A comprehensive Emergency Response Plan will be in place, with staff trained in fire safety, evacuation procedures, and first aid. Emergency contact information and procedures will be clearly displayed in all guest rooms.

### 7.6 Waste Management

A dedicated waste management plan for the hotel will be implemented, focusing on waste separation, recycling, and minimizing landfill. This will include separation of glass, plastics, paper/cardboard, and food waste.

## 7.7 Deliveries and Servicing

Deliveries and servicing will be managed to minimize disruption to guests and the surrounding public domain. A dedicated loading dock and service area will be utilized, with deliveries scheduled during off-peak hours where possible.

## 8. Addressing SEARs Advice from Liverpool City Council (LCC)

This section specifically addresses the requirements outlined in the SEARs advice issued by Liverpool City Council (LCC) on 8 January 2025. The matters raised by LCC are addressed across the suite of specialist reports and are summarised in line with the table provided on pages 5–7 of the Council’s letter.

### a. Strategic Planning Compliance

All development documentation has been prepared in full alignment with the following strategic and statutory planning documents:

- Western Sydney Aerotropolis Plan (2020)
- State Environmental Planning Policy (Precincts—Western Parkland City) 2021 (Chapter 4)
- Western Sydney Aerotropolis Precinct Plan (May 2023)

The staging of the development is linked to the availability of essential services—including public road access, water supply, electricity, and stormwater infrastructure—at the time they are required. The Services Infrastructure Report provides a detailed inventory of available services and outlines the servicing strategy for the development. This strategy is further reinforced in the Integrated Management Plan, which is appended to this document.

**The following documents are part of the EIS submission:**

No.	Document / Report	Additional Comment/ Notes
1	Aboriginal and Historical Archaeological Assessment	Part of EIS submission
2	Architectural Plans	Part of EIS submission
3	Access Report	Part of EIS submission
4	Acid Sulphate Soils Assessment	Part of EIS submission
5	Acoustic Report	Part of EIS submission
6	Arborist Report	Part of EIS submission
7	Aviation Safeguarding Assessment	Part of EIS submission
8	BASIX Certificate	Part of EIS submission
9	BCA Compliance Report	Part of EIS submission
10	Bushfire Report	Part of EIS submission
11	Contamination Assessment	Preliminary Site Investigation report is part of EIS submission

12	Connection to Country Statement	Connecting to Country Report is part of EIS submission
13	CPTED Report	Part of EIS submission
14	Construction Environmental Management Plan (CEMP)	Part of EIS submission, this is included in the IMP which is appended to this document
15	Design Verification Statement & ADG Assessment	Part of Architectural Design Report
16	Dilapidation Report	This will be prepared during Detailed Design stage
17	Erosion and Sediment Control Plan	Part of Civil and Stormwater Package
18	Flood Impact and Risk Assessment	Part of EIS submission
19	Geotechnical Report	Part of EIS submission
20	Interim Travel Demand Management Plan	Part of CTMP
21	Landscape Plans	Landscape Plans and Reports are part of EIS submission
22	Noise and Vibration Report	Addressed in Acoustic Report
23	On-site Sewage / Wastewater Report	Part of Services Infrastructure report and IMP
24	Environmental Management Plan	Part of EIS submission, CEMP is included in the IMP which is appended to this document
25	Quantity Surveyor's Report	Part of EIS submission
26	Plan of Management	This will be prepared during Detailed Design stage by each operator
27	Plan of Management – Tourist & Visitor Accommodation	This will be prepared during Detailed Design stage
28	Public Art Report and Plan	This will be prepared during Detailed Design stage
29	Rail Noise Assessment	Addressed in Acoustic Report
30	Salinity / Sodicity Hazard Assessment	Part of EIS submission
31	Salinity Management Plan / Detailed Salinity Analysis	Part of EIS submission
32	Social Impact Assessment	Part of EIS submission
33	Statement of Environmental Effects / EIS	Part of EIS submission
34	Stormwater Management Strategy	Part of EIS submission
35	Survey Plan	Part of EIS submission
36	Transport Impact Statement	Part of CTMP
37	Travel Plan	Green Travel Plan Part of EIS submission
38	Tree Protection Plan	Part of Biodiversity Management Plan and Vegetation Management Plan
39	Utilities Plan and Report	Part of EIS submission
40	Visual / View Impact Assessment	Part of EIS submission
41	Vegetation Management Plan	Part of EIS submission
42	Waste Management Plan	Part of EIS submission
43	Water Management Plan	Part of EIS submission
44	Weed Eradication and Management Plan	Part of EIS submission

## b. Environmental Health

A Stage 1 Preliminary Site Investigation has been completed. The findings confirm that a Detailed Site Investigation, Remedial Action Plan, and Preliminary Long-Term Environmental Management Plan are not required. The recommendations of the investigation have been incorporated into the Environmental Management Plan, and mitigation measures outlined in the Environmental Impact Statement (EIS).

A comprehensive Acoustic Assessment has also been prepared, covering both construction and operational phases in accordance with NSW EPA and industry guidelines. The assessment addresses airborne noise, vibration, and cumulative effects on sensitive receivers.

A Construction and Operational Waste Management Report has been prepared. The designated waste storage area is identified on the site plan and is located within the proposed building. The garbage/waste storage area has been designed to comply with relevant standards and incorporates the following requirements:

- a) The room will be fully enclosed, with a concrete floor and concrete or cement-rendered walls covered to the floor.
- b) A floor waste will be provided, consisting of a removable basket within a fixed basket arrestor, in compliance with Sydney Water requirements.
- c) The door will be tight-fitting, self-closing, and fitted with mechanical ventilation.

### **c. Urban Design & Public Domain**

The Architectural Design Report and Landscape Design Report, submitted as part of the EIS package, address all relevant LCC SEARs Urban Design and Public Domain requirements.

The scheme has been recalibrated to reflect the anticipated future context, applicable planning controls, and site-specific zoning and FSR. Building podiums and setbacks have been designed to ensure full compliance with the DCP and Apartment Design Guide (ADG). A comprehensive 2D/3D contextual shadow analysis has been undertaken, with particular consideration of impacts on southern and south-western open spaces.

The existing water body, which forms part of the site's creek line, will be retained in its natural state together with the riparian corridor. This corridor will become the central feature of the development, providing a community-focused natural asset. Solar access and shadowing impacts on this area, as well as the broader context, have been comprehensively assessed and integrated into a landscape-led public domain framework, supported by a project-specific Connecting with Country strategy.

As part of the revitalisation and preservation of the creek and riparian corridor, the alignment of the north-south road identified in the Precinct Plan has been realigned to ensure the corridor is maintained in its natural state. This approach is further detailed and illustrated in the Architectural and Landscape Design Reports.

The Design Reports demonstrate compliance with the Bradfield City Centre Master Plan, subject to minor justified variations. They include detailed treatments of public-domain interfaces, confirm the preferred north-south road alignment, and provide an assessment of potential impacts on neighbouring properties. The Landscape Plans and Reports also present a detailed public domain plan, streetscape elevations. Architectural renders, and a comprehensive visual analysis and impact assessment have been completed and are included within the EIS package.

#### **d. Engineering**

The Civil and Integrated Water Management Plan and Stormwater Plans, prepared as part of the EIS, address all requirements relating to stormwater management. The Urban and Site Analysis - The road profile section in the Architectural Design Report and supporting traffic report, addresses the Bradfield/Badgerys Creek Road network, including setbacks for future widening of 10 metres along Badgerys Creek Road in accordance with Chapter 5 of the Aerotropolis DCP, and 2.88 metres along Innovation South, consistent with the Addendum issued by the BDA. The analysis also incorporates the provision of active transport links.

The Earthworks Strategy has been designed to avoid concentrating or redirecting overland flows. The Geotechnical Assessment provides a detailed analysis of site stratigraphy and salinity conditions and sets out compliant recommendations for filling and pavement design. The Utilities and Infrastructure Servicing Report confirms the delivery pathway for all essential services to support each stage of the development.

#### **e. Flooding**

TUFLOW flood modelling and the Flood Impact and Risk Assessment Report have been completed, demonstrating that the development will not result in adverse flood impacts on or off-site. Any potential impacts have been addressed through the project design.

The site has been assessed by ecologists, and in accordance with the WSA DCP, the Strahler Order 2 watercourse will be retained in its natural state. This is discussed in the Surface Water Assessment. Overland flow paths and riparian planting will be integrated into the open space network, and the Integrated Water Management Plan addresses the relevant requirements for stormwater and waterway management in this section.

#### **f. Community Planning**

A Social Impact Assessment has been completed in accordance with Council and NSW guidance as part of the package. A CPTED report has also been prepared and included in the EIS package, the mitigation measures have been incorporated into the design and are addressed in the Architectural Design Report.

#### **g. Traffic & Transport**

A Transport and Traffic Impact Assessment has been completed, addressing trip generation and distribution, analysis of the impacts of the proposed development during construction and operation, parking supply and AS2890 compliance, measures to mitigate any traffic impacts, measures to promote sustainable travel choices for employees, guests and visitors, active transport connectivity,

servicing and swept paths, and cumulative impacts. A staging plan outlines interim and ultimate layouts. Additionally, a Preliminary Construction Traffic Management Plan has been prepared, detailing haulage routes, on-site worker parking, traffic control measures, coordination with other works, and protection of pedestrian and cycle networks.

#### **h. City Economy**

The Estimated Development Cost (EDC) report, prepared by the Quantity Surveyor, provides an estimate of both retained and new jobs expected to be created during the construction phase of the development, including details of the methodology used to determine these figures in Section 2.5.

##### **Construction Phase Employment**

It is estimated that the construction of the proposed development will generate approximately 142 full-time equivalent (FTE) construction jobs over the duration of the works. This estimate has been calculated using industry-standard assumptions for labour cost allocation and construction duration, based on the elemental cost breakdown provided in the EDC summary prepared by Altus Group dated 10 October 2025.

It should be noted that this figure represents full time equivalent positions, rather than the total number of individual workers, as not all tradespeople will be engaged on a full-time basis throughout the project.

##### **Operational Phase Employment**

During the operational phase, employment generation is determined by the gross floor area (GFA) of each land-use type and the corresponding workplace density assumptions. For this assessment, the NSW Department of Planning's 2023 CPAG Workspace Ratios have been adopted as the basis for estimating operational employment, as they provide the most current and authoritative guidance applicable.

The subject site is located within the Aerotropolis Core, where a key planning consideration is the delivery of sufficient employment-generating uses. The Aerotropolis Precinct Plan identifies indicative employment density targets of 130–400 jobs per hectare.

### ***Estimated Operational Employment***

<b>Land Use</b>	<b>GFA (m<sup>2</sup>)</b>	<b>2023 CPAG Workspace Category</b>	<b>Workspace Ratio (m<sup>2</sup>/job)</b>	<b>Jobs (Calculated)</b>
<b>Residential</b>	41,708	–	–	
<b>Retail</b>	4,531	Shops and cafés	35	<b>130</b>
<b>Food &amp; Drink Premises</b>	1,253	Shops and cafés	35	<b>36</b>
<b>Hotel</b>	17,391	Hotel premises	100	<b>174</b>
<b>Childcare</b>	1,466	Childcare centre	35	<b>42</b>
<b>Commercial (Office)</b>	1,095	Office within 10 mins of a transport node	20	<b>55</b>
<b>Medical Centre</b>	1,913	Medical centres	32	<b>60</b>
<b>Recreation Facility (Indoor)</b>	887	Fitness centre	100	<b>9</b>
<b>TOTAL JOBS</b>				<b>506</b>

### ***Total Operational Phase Employment***

When combined across all uses, the proposed development is expected to support approximately 506 jobs during the operational phase.

#### **i. Heritage & Aboriginal Culture / Connecting with Country**

A Walk on Country and Design consultation was conducted, the sessions established a cultural narrative with Elders and were followed by collaborative workshops to integrate Indigenous traditional knowledge into the modern design. The consultation, led by JMP Aboriginal Consultancy, ensures that the project reflects and respects local cultural heritage, and their report accompanies this SSDA.

Additionally, an Aboriginal Cultural Heritage Assessment Report, archaeological test excavation reports, and a Statement of Heritage Impact have been prepared and form part of this submission.

#### **j. Public art**

A Public Art Plan will be developed during the detailed design stage, with some aspects already highlighted in the Connecting with Country report. During detailed design, areas where artwork can be integrated into the development will be identified, combining both traditional Indigenous and contemporary styles. The plan will detail governance, commissioning, concept integration with architecture and landscape, and documentation milestones to be completed prior to construction and prior to occupation.

#### **k. Waste Provisions**

A project-wide Waste Management Plan has been prepared for construction and operation. It separates residential and non-residential streams at source, provides for FOGO in all residential buildings, includes bulky-waste rooms where applicable, sizes internal rooms for weekly on-site collection (policy-level rates adopted), and confirms rear-loader access with straight truck paths and compliant clearances. No kerbside collection is proposed.

#### **l. Landscape & Arboriculture**

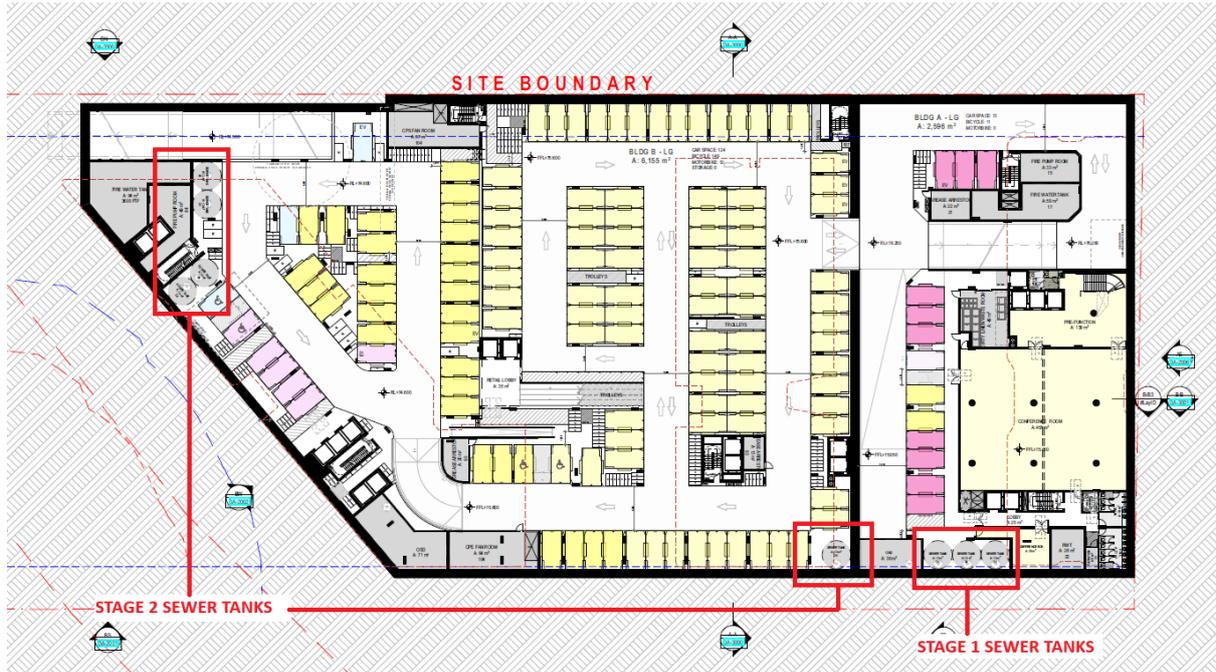
A detailed Landscape Package and Arborist Report (AS 4970-2009) have been prepared. Planting palettes prioritise native species characteristic of the local ecological communities and integrate with the retained waterway and overland flow paths to deliver shaded, walkable links and biodiversity outcomes.

#### **m. Development Contributions**

The proposal acknowledges the applicability of the Liverpool Contributions Plan (Aerotropolis) Section 7.12 levy, which is detailed in the Contributions and Public Benefit section of the EIS.

#### **n. Utilities**

The Infrastructure Servicing Report confirms that all utility services are available for each stage, except for sewer, as there are currently no Sydney Water wastewater assets in the area. Sydney Water is understood to be in the process of extending the wastewater network. In the interim, sewer holding tanks have been incorporated, with daily wastewater generation calculated for Stages 1 and 2 to size the system—three tanks for Stage 1 and five tanks for Stage 2. The tanks are located within the lower-ground car park, with locations determined based on gradient, volume, and suction requirements, and will be serviced daily via vacuum truck access from Innovation South Street. These interim tanks will be decommissioned and removed once a direct connection to Sydney Water’s reticulated sewer becomes available. A Water Services Coordinator has already been engaged, and feasibility letters have been obtained from Sydney Water. The coordinator will continue to be engaged during the detailed design stage and subsequent project phases to confirm the preferred connection strategy.



**Figure 4 Locations of the Sewer Tanks**

Source: PLUS Architectural Design Report



**Appendix A – Integrated Management Plan (IMP)**

## Appendix A - Integrated Management Plan – QHSE

135 Badgerys Creek Road: Mixed Use Development  
Lot 7 in DP 243457  
Bradfield Corporation Pty Ltd



**Developer** Bradfield Corporation Pty Ltd

**Head Contractor / Builder** To be confirmed

**Client Representative** Creative Vision

**Project Director** David Kamel

**Integrated Management Plan (IMP) Revision History and Issue Details – Project Plan - 135 Badgerys Creek Road, Bradfield**

<b>DATE</b>	<b>REV</b>	<b>DETAILS</b>	<b>PREPARED BY</b>	<b>AUTHORISED BY</b>
5/09/2025	01	IMP – Revision 0	S F	D K
13/10/2025	02	IMP - Final	S F	D K

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## 1 INTRODUCTION

This Integrated Management Plan (IMP) has been prepared for use by personnel on the **Project at 135 Badgerys Creek Road, Bradfield**

This IMP is a live document that will keep evolving with the project and will be updated monthly to reflect current site conditions. It provides an outline of the controls and procedures Bradfield Corporation will employ for the above project. It addresses in particular the Planning Secretary's Environmental Assessment Requirement (SEARs) 24, as well as Quality, Environmental, Work Health & Safety requirements specific to this project. This Integrated Management Plan provides details on what must be done to achieve efficient and effective management of the entire project from award of Tender, through to Project Handover.

*Note:* This document has been developed out of Bradfield Corporation central Integrated Management System (IMS) and is underpinned and supported by the Policies, Manual, Procedures, Registers, Forms, Templates, Records, Work Instructions, Management Plans which make up that system.

This Integrated Management Plan (IMP) has been developed to address the requirements of the Secretary's Environmental Assessment Requirements (SEARs) and relevant legislative Acts, in conjunction with the Construction, Operation, and Staging Plan. It provides a structured framework for the effective planning, coordination, and execution of all project activities. As this document is preliminary in nature, it will be further refined and updated as the project progresses and more detailed information becomes available.

The report will assess ways of minimising the impact of construction works associated with the proposed works at the development site. The Construction Management Plan (CMP) in Section 12 will outline the procedures which are intended to be implemented to manage construction activities so as to ensure that these activities do not lead to the generation of unacceptably high levels of environmental or community disturbance over the life of the project.

## 1.1 Site Plan

A Preliminary Site Plan has been prepared and forms part of the architectural design package in accordance with SEARs Requirement 4: Built Form and Design. The plan illustrates the site boundaries, proposed building footprint, construction staging, and access strategy for each stage. As the project advances into subsequent phases, the Site Plan will be further developed to incorporate detailed allocations for site facilities, safety provisions, along with utilities and services. These elements will be included in future revisions of this report. Please refer to the Site Plan in conjunction with the enclosed Construction Management Plan.



Figure 1: Site Plan (PLUS Studio Design report)

## 1.2 Project Scope

The proposed development at 135 Badgerys Creek Road, Bradfield, involves the construction of a mixed-use development comprising residential, hotel, and commercial components. The scope includes enabling works, construction of three main buildings, multiple basement structures for parking, public domain upgrades (including City Street and a public plaza), rehabilitation of the riparian corridor, landscaping, and services augmentation. The project aims to create a vibrant and integrated precinct within the Aerotropolis Core, supporting the growth of Bradfield City Centre and leveraging its proximity to Western Sydney International Airport.

**The major work packages** expected on this project are:

- Temporary site perimeter fencing and hoardings
- Shoring and Excavation (bulk & detailed)
- Piling
- Concrete slab(s)
- Post Tension
- Masonry
- Façade Works
- Passenger Lifts
- Scaffolding
- Luffing Crane
- Plasterboard
- Waterproofing
- Tiling
- Joinery
- Mechanical
- Hydraulic – including stormwater
- Electrical
- Fire Protection and fire sealing
- Metalwork
- Sanitary fixtures
- Signage
- Landscaping and Irrigation
- Public Domain Works

### 1.3 References

- SEARs requirements dated 30/01/2025
- Erosion and Sediment Control Measures
- Environmental Protection Legislation
- Protection of the Environment Operations Act 1997
- Waste Minimisation Act 2001
- Environmental Planning and Assessment Act 1979
- Work Health and Safety Act 2011 (and associated Regulations)
- Building Code of Australia (BCA) / National Construction Code (NCC)
- Australian Standards (relevant to construction, safety, and environmental management)
- Local Council Development Control Plans (DCP) and Local Environmental Plans (LEP)
- Roads Act 1993 (for works affecting public roads)
- Water Management Act 2000
- Heritage Act 1977
- Biodiversity Conservation Act 2016
- Contaminated Land Management Act 1997
- SafeWork NSW Codes of Practice

### 1.4 Consultation

The planning and implementation of the construction works will be completed in consultation with the following statutory authorities where applicable:

- Department of Planning, Housing and Infrastructure (DPHI)
- Planning NSW Regulations
- Environmental Protection Authority (EPA).
- Sydney Water
- Endeavour Energy
- TfNSW
- Safe Work NSW.
- NSW Planning Portal
- NBN
- Liverpool City Council
- RFS
- Bradfield Development Authority
- CASA
- Department of Climate Change, Energy, Environment and Water
- Fire and Rescue NSW
- Western Sydney Airport
- Department of Infrastructure, Transport, Regional Development, Communications and the Arts

### 1.5 Construction Hours

Hours of operation on site will be subject to the Noise and Vibration Impact Assessment, the SSD consent, and the requirements of Liverpool City Council

Weekdays: 7:00am – 6:00pm

Saturdays: 8:00am – 1:00pm

Sundays and public holidays: no work unless permitted by Liverpool City Council

## 1.6 Project Objectives

As part of the objectives of the Integrated Management Plan, Bradfield Corporation is committed to undertake the following tasks:

1. Ensure that the works are completed in accordance with the documents.
2. Identify workplace hazards, assess associated risks and implement suitable control measures.
3. Identify significant environmental aspects and impacts associated with the works, and implement suitable control measures.
4. To minimise Health and Safety risk and aim to have zero Lost Time Injuries (LTI).
5. Identify and adhere to statutory requirements, compliance limits and other requirements applicable to the project.
6. Plan work activities to employ safety and environmental controls to minimise risk of injury to persons or damage to the environment.
7. Routinely monitor the effectiveness of the implemented quality, safety and environmental controls and continuously improve where possible.
8. Conduct regular inspections and audits during the project.
9. Establish emergency response procedures to minimise the impact of any safety or environmental incidents that may occur.
10. Enable communication and consultation measures to be undertaken as per contractual agreements and changing project conditions.
11. Provide objective evidence of the conformance of completed activities to the specified requirements.
12. Enforce compliance requirements when required through warnings, non-conformance reports, penalties, monetary cost recovery and other avenues.
13. Improve project control measures and revise the Integrated Management Plan whenever deficiencies are identified or changed circumstances require.

The objectives of the IMP are to:

- Provide a Management plan within which construction activities may be completed in a manner which will satisfy environmental and community requirements.
- Outline procedures to be adopted when undertaking construction activities.
- Outline procedures to be adopted when monitoring construction performance against agreed criteria.
- Schedule statutory requirements in respect to environmental issues associated with construction of the work.

## 1.7 Specific Requirements:

### 1.7.1 Work Restrictions:

1. The works area and construction access will be restricted to the immediate area required for the execution of the works. This will be in accordance with the necessary permits and

approvals. Work boundaries will be established, and a detailed plan will be prepared and included as part of this document as it evolves.

### **1.7.2 Site limitations**

1. The Contractor's access on and around the site and the use of the site for the project period shall be restricted to those areas approved by SSDA and relevant State approvals.
2. The public way must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.
3. Non-compliance with either of the above requirements will result in the issue of a notice by Council to stop all work on site.
4. Any storage areas are to be kept in a neat and tidy manner and minimize hazards to persons, materials and equipment. The Contractor shall submit a proposed storage area or areas for approval.
5. Liverpool City Council will not be responsible for any loss or damage resulting for the storage area.

### **1.7.3 Programming and Construction Method Constraints**

The Contractor's programming of the Works Under Contract (WUC) and methods of construction must also take into account the following constraints:

1. The Contractor is restricted to the site area shown on the drawings and as noted in the document.
2. Provision for emergency egress is to be provided through the construction area in the event of fire.
3. Access is to be maintained for all persons along the footpath.
4. Clearance must be provided for public transport buses, which may travel in the kerb side lane.
5. The operating hours of adjacent existing business must not be disrupted except with approval of the business owner.
6. All temporary WUC and public access areas are to be kept clean to the satisfaction of the local authorities.

### **1.7.4 Security**

It is the Sub-contractor's responsibility to ensure the site and their plant and materials are safe and secure after hours. Bradfield Corporation shall make its own arrangements for the security of the site.

### **1.7.5 Graffiti**

All graffiti from on the site shall be removed within 48 hours of its application.

### **1.7.6 Legislative Compliance**

It is the builder's responsibility to do the following;

1. Obtain Application of Road Opening, Application for Temporary Works and Application for Crane permits from the local authorities unless sub-contracted otherwise.
2. Prepare and submit a site specific Construction Management Plan (CMP).
3. Prepare and Submit a Traffic Management Plan (TMP).
4. Prepare and Submit a Soil and Water Management Plan (SWMP)
5. NB: An approved SSSMP, TMP and SWMP are needed prior to starting on site.

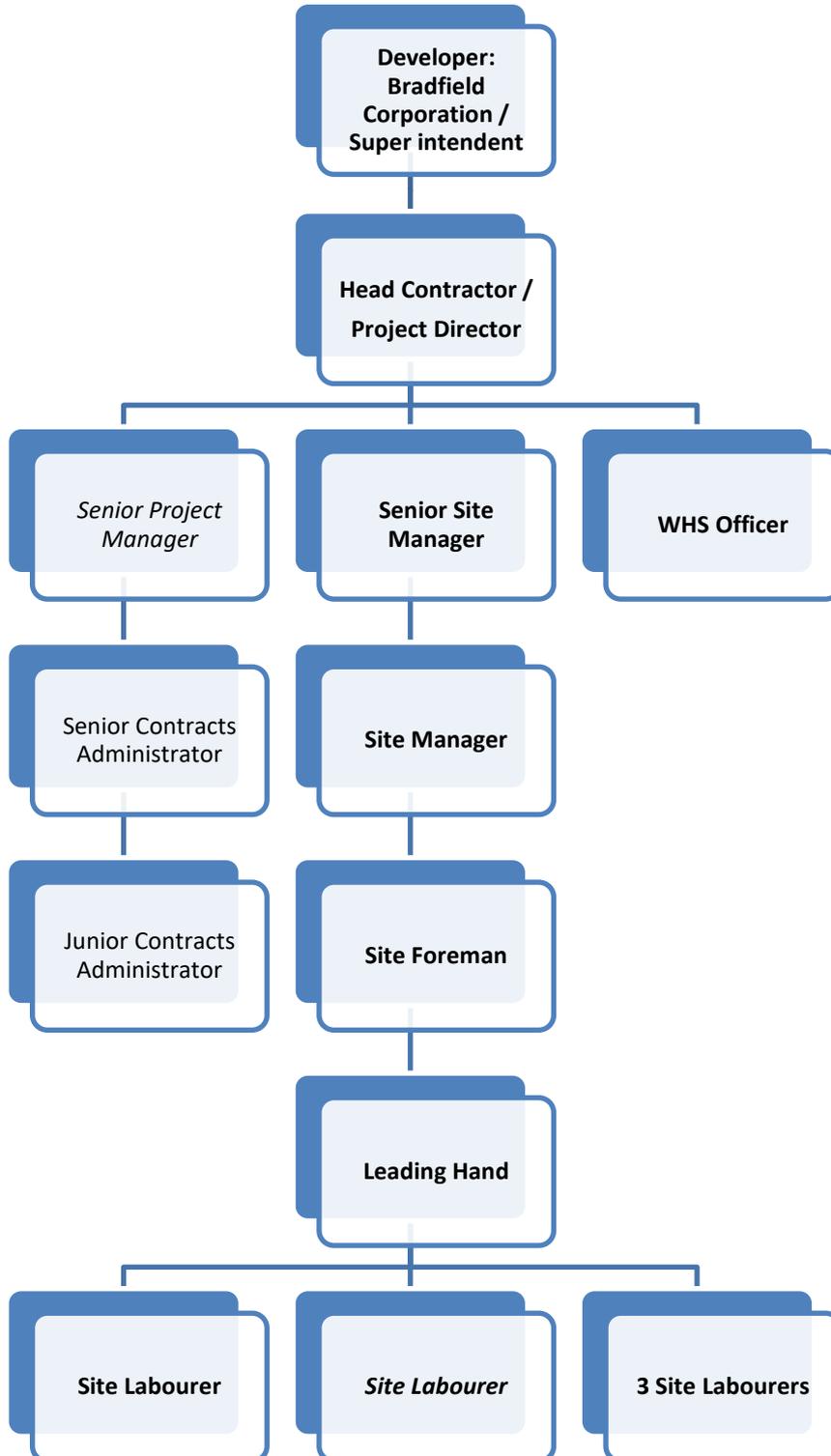
## 2 PROJECT STRUCTURE, ROLES AND RESPONSIBILITIES

### 2.1 Project Structure

The following diagram shows the indicative roles and organisational structure for the project:

135 Badgerys Creek Rd, Bradfield

Indicative Team Structure



## 2.2 Roles & Responsibilities

Bradfield Corporation will provide the following key personnel for the project. The authorities and responsibilities of project personnel are defined below.

### 2.2.1 Project Manager / Project Director

The Project Management Team is responsible for:

1. The delivery of the project and is the nominated Project Representative
2. Managing resources required for the implementation of the Integrated Management Plan and ensuring that the control measures are maintained
3. Facilitations and participation in communication and consultation requirements with subcontractors and Bradfield Corporation Management. Inclusive and not limited to design meetings, trade co-ordination meetings and site meetings.
4. Identifying training needs and allowing employees to attend the training
5. Ensuring Subcontractors/Suppliers have relevant qualifications and experience, and are inducted into project/site-specific requirements prior to commencement of work on site
6. Use of all communication streams including understanding and use of emails and Procore. Used for the communication of drawings, document control, instructions, submittals, and all other official communications with subcontractors.
7. Providing service providers in the contract chain (Consultants, Subcontractors and Suppliers) with the Site Specific IMP, and all updates to the IMP
8. Implementing the company's Quality, WHS and Environmental policies and procedures throughout project delivery
9. Managing compliance with all WHS and Environmental requirements and statutory rules and regulations (in conjunction with the IMS Representative at Head Office), including approvals licences, permits and authorities
10. Ensuring current WHS and other relevant legislative requirements are met in the workplace
11. Liaising with regulatory bodies on issues of WHS and the Environment throughout the project
12. Liaising with Client/Superintendent on issues of WHS and the Environment throughout the project
13. Addressing and responding to community feedback (complaints and compliments) regarding the site
14. Ensuring that all works are conducted in a manner that is safe and without risk to employees' health and safety
15. Ensuring safe equipment and plant is provided and maintained
16. Ensuring safe work practices at all times
17. In conjunction with the Director, coordinating rehabilitation for injured employees, and providing suitable employment to assist rehabilitation initiatives
18. Conduct monitoring of compliance with safe work procedures (including SWMSs, Site Safety Rules etc) by employees and subcontractors, and safety of the worksite in general
19. Ensuring that any improvements resulting from Inspections are addressed in the required time frame

20. Providing advice, assistance and consultation on WHS to all employees
21. Together with the On Site Construction Manager, managing WHS communication and consultation provisions in accordance with regulatory and other requirements.
22. Ensuring recording all WHS incidents and conformance issues and their solutions
23. Investigating hazard reports and ensuring that corrective actions are undertaken
24. Conducting Incident investigations
25. Facilitating the maintenance of all records as required
26. Facilitating the preparation of Safe Work Instructions for the trades
27. Assessing and monitoring Subcontractor capabilities and performance in respect to site activities
28. Determining Traffic Control requirements at the site
29. Preparing and participating in safety meetings and safety programs, including client-led Contractor safety audits
30. Development and implementation of the management plans to control specific Environmental issues, including Erosion, Sediment and Waste Management
31. All reporting as required under the Contract
32. Monitoring of the implementation of process controls developed for the works
33. Ensuring conformance records are established which demonstrate the compliance of the works with specifications
34. All areas defined below for the On Site Construction Manager in their absence
35. Participating in Site Inspections and EHS Walks as per the Inspection regime
36. Authorising the company's Quality, Environment, Occupational Health Safety and Rehabilitation procedures
37. Defining the WHS and injury management responsibilities for key position holders in the organisation
38. Ensuring funding is available for quality, environment and safety training needs
39. Reviewing safety reports and inspections and initiating rectification where necessary
40. Participating in safety meetings and programs
41. Participating in any Client-led Contractor safety audits
42. Allocating resources required for the implementation of the Integrated Management Plan (IMP)
43. Selection and approval of Suppliers and Subcontractors
44. Liaising with the Client
45. Ensuring that environmental impact assessment and environmental control planning is carried out by suitably qualified/experienced staff
46. Overseeing decisions in Coordination of the Injury Management and Return to Work programs for injured employees
47. Participating in site EHS Walks as per the Inspection regime

### 2.2.2 Construction Manager

The Construction Manager is responsible for:

1. Implementing Bradfield Corporation' Quality, WHS & Environmental policies and procedures on site
2. Participation in communication and consultation requirements with subcontractors and Bradfield Corporation Management. Inclusive and not limited to design meetings, trade co-ordination meetings and site meetings.
3. Use of all communication streams including understanding and use of emails and Procore. Used for the communication of drawings, site diary, instructions, submittals, and all other official communications with subcontractors.
4. Observing all WHS requirements and statutory rules and regulations
5. Ensuring that all works are conducted in a manner that is safe and without risk to employees' health and safety
6. Planning to do all work safely and cause minimal environmental impact
7. Preparing and participating in safety meetings and safety programs
8. Insisting and ensuring on safe work practices at all times
9. Leading by example and promoting WHS at every opportunity
10. Supervising and ensuring compliance with safe work procedures
11. Conducting Site Inductions, issuance of hard hat stickers, Toolbox Talks and team briefings
12. Ensuring all sub-contractor files are current and on site as provided by QHSE Manager
13. Implement and comply with use of only approved wash out bays and other environmental measures to contribute to sustainable work practices.
14. Maintaining items on the site compliance checklist
15. Maintaining the Site Induction Register.
16. Coordinating site activities and ensuring adherence to the developed process controls
17. Ensuring Site Safety Rules and Emergency Management information is prominently displayed, with copies available on site and provided to all site workers and visitors
18. Ensuring compliance of personnel with site safety rules
19. Providing advice, assistance and consultation on WHS and injury management to employees
20. Working with the QHSE Manager, managing WHS communication and consultation provisions in accordance with the regulatory and other requirements.
21. Identifying hazards, assessing the risks associated and documenting the risk control measures to be taken
22. Monitoring compliance with safe work procedures
23. Providing First Aid on site
24. Maintaining First Aid supplies on site
25. Ensuring plant operators are conducting daily inspections of plant or pre-start checks
26. Facilitate the approval of approved wash out bays and other environmental measures to contribute to sustainable work practices.

27. Monitoring site Safety and Environmental compliance daily
28. Conducting weekly Site Inspections and EHS Walks as per the Inspection regime and ensuring that any improvements resulting from Inspections are addressed in the required timeframes
29. Dealing with Incident management in respect to and including potential accidents/ dangerous occurrences and notifying relevant personnel of this responsibility
30. Participating in Incident investigations
31. Control of work process when nonconformity has been detected
32. In consultation with the Project Manager, identifying and recording nonconformities; the On Site Construction Manager has the authority to initiate and document corrective and preventive action
33. Preparing, maintaining and making available the Register of Hazardous Substances
34. Distributing site documents such as SWMS and Bradfield Corporation procedural forms as required

### **2.2.3 QHSE Manager**

The WHSE Manager is responsible for:

1. Guiding and instructing the Project Team on the implementation of QHSE management requirements on site
2. Participation in communication and consultation requirements with subcontractors and Bradfield Corporation Management. Inclusive and not limited to trade co-ordination meetings and site meetings.
3. Use of all communication streams including understanding and use of emails and Procure. Used for the communication of drawings, document control, instructions, submittals, and all other official communications with subcontractors.
4. Conducting regular QHSE on Site Audits
5. Conducting/implementing Training as required, for example: PPE, Manual Handling, WHSE on Site
6. Facilitating the preparation of Safe Work Method Statements for the trades
7. Working with sub-contractors to ensure compliance with all their Quality, Work, Health and Safety requirements.
8. Undertaking adhoc Site Inspections and EHS Walks to check systems implementation and support the Project Team in compliant project delivery
9. Overseeing and Tracking the completion of Quality assurance compliance including but not limited to Inspection Test Plan (ITP) completion for all trade tasks.
10. Implementing the company's WHS and injury management procedures
11. Managing compliance with WHS and injury management legislation, regulations, standards and codes
12. Liaising with regulatory bodies on issues of WHS and the Environment throughout the project
13. Participating in safety meetings and programs

14. Assisting in monitoring and compliance with use of environmental measures to contribute to sustainable work practices.
15. Participating in any Client-led Contractor safety audits
16. Coordinating the Injury Management and Return to Work programs for injured employees
17. Participating in Site Inspections and EHS Walks as per the Inspection regime

#### **2.2.4 Employees**

Bradfield Corporation employees are responsible for:

1. Maintaining a sound knowledge of Bradfield Corporation rules, procedures and practices
2. Working safely and maintaining safe workplaces
3. Avoiding taking unacceptable risks
4. Ensuring that before they start a new task or job they know how to do it safely
5. Reporting any hazard to their Manager/Supervisor
6. Submitting their own ideas about how to improve safety to their Supervisor or consultative group
7. Keeping their workplace clean and tidy
8. Wearing/using protective equipment in designated areas and for designated tasks
9. Abiding by all safety warnings/signs and danger tag/s
10. Taking direction from their direct manager with all concerns in regard to quality, health, safety and environment and assist in implementation when necessary.
11. Comply with use of only approved environmental measures to contribute to sustainable work practices.

#### **2.2.5 Sub-Contractors**

Sub-Contractors are responsible for:

1. Taking reasonable care for the health and safety of others in the workplace
2. Participation in communication and consultation requirements with subcontractors and Bradfield Corporation Management. Inclusive and not limited to design meetings, trade co-ordination meetings and site meetings.
3. Facilitation and participation in Pre-start meetings, conveying changing site specific conditions from all management levels to all workers.
4. Cooperating with your all stakeholders to ensure Quality, Health, Safety and Environmental compliance
5. Ensuring workers will advise Supervisors about hazards or other safety matters they are aware of and then this being communicated to site management.
6. Supplying and all workers wearing/using safety equipment supplied to you/as required by your SWMS and the Bradfield Corporation Site Safety Rules
7. Carrying out all work in a manner which ensures safety and environmental compliance
8. Following health and safety instructions when using and maintaining machinery and equipment, properly taking notice of signs
9. Adhering to speed limits on and in the vicinity of Bradfield Corporation sites
10. Participating in safety training

11. Taking reasonable care for the safety of co-workers and visitors to site
12. Ensuring that plant and substances are in a safe condition and that their systems of work and the working environment is safe
13. Maintaining and providing to Bradfield Corporation current Safety Data Sheets (SDS/MSDS) for all hazardous substances used and ensuring that this information is communicated to workers
14. Keeping a register of all Hazardous Substances used in work activities, their risk assessments and management plans and communicating these to workers
15. Reading, understanding and adhering to each site specific WHS management plan, risk assessments of the work to be carried out and written Safe Work Method Statements
16. Ensuring workers have undertaken WHS induction training as required, received a hard hat sticker and wear the correct hard hat number for identification in an emergency. Non-compliance with this will result in a penalty.
17. Maintaining and communicating the Safe Work Method Statement/s, ensuring they are site specific and up to date.
18. Ensuring all workers are signed on to necessary SMWS for the tasks they are undertaking.
19. Obtaining, maintaining and providing to Bradfield Corporation all necessary compliance requirements as stated by legislation and contracted agreements. Including: Insurances, SWMS, SDS/MSDS, licenses, test and tag registers, plant and equipment registers, permits. This includes any changing requirements if justified by need.
20. Comply with use of only approved amenities on site, with the intention of also leaving them as clean as practicable.
21. Comply with use of only approved wash out bays and other environmental measures to contribute to sustainable work practices.
22. The Contractor's access on and around the site and the use of the site for the project period shall be restricted to those areas approved by Liverpool City Council in development consent.
23. The public way must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances, a non-compliance from Bradfield Corporation can result.
24. Non-compliance with either of the above requirements will result in the issue of a notice by Council to stop all work on site and/or non-compliance by Bradfield Corporation.
25. Any storage areas are to be kept in a neat and tidy manner and minimise hazards to persons, materials and equipment. The Contractor shall submit a proposed storage area or areas for approval.
26. Bradfield Corporation will not be responsible for any loss or damage resulting for the storage area.

### 3 RESOURCES AND TRAINING

#### 3.1 Employee Training

Bradfield Corporation ensures that its employees are adequately trained to a level of competency sufficient to ensure they can perform the work to the required standard and under safe conditions. This is done through Policy, Planning, Identification, Monitoring, Evaluation, Maintenance and Review. Where skill deficiencies are detected, appropriate training will be provided before work commencement. Records of training are maintained at Bradfield Corporation Head Office.

A register of holding authorisations, permits, competency certificates and licences held by Bradfield Corporation employees relevant to this project has been included as

#### 3.2 Site Inductions

Prior to carrying out work at the project site all employees and subcontractors are required to have completed WHS Induction Training. This shall consist of:

1. General Construction Industry WHS induction (White card)
2. Site Specific WHS induction Training
3. Completion and understanding of the site specific Site Induction Record
4. Inclusion on the master Site Induction Register for Emergency use.

This shall be conducted by the On Site Construction Manager or suitable delegated Bradfield Corporation personnel the first day an employee or Subcontractor arrives on site, prior to them commencing any work and in accordance with this Plan.

Employees and subcontractors will be inducted on any new hazards and/or considerations that arise on site as they are identified. This will be completed and recorded on *Toolbox Meeting Record* and *Pre-start talks*.

##### 3.2.1 General Construction Industry OHS induction

Together with the completed Site Induction Record, the On Site Construction Manager retains a copy of each "White Card" (Safe Work Certificate of Induction), photo identification, required licenses or certificates.

##### 3.2.2 SWMS, Work Activity Induction & Other WHS training

###### Safe Work Method Statements

Safe Work Method Statements (SWMS) identify the risks involved in specific high risk work activities to be carried out on the project and outline controls and procedures to be employed to eliminate, mitigate or reduce these risks. As such it is a requirement that all personnel working on the identified tasks, listed in section 5.1.1 of this plan, have read and understood the applicable SWMS and have been trained in the safe practices required to complete the task prior to commencing work.

All SWMS for the project are maintained by the On Site Construction Manager with each subcontractor file.

### **Work Activity Induction**

All personnel must be trained or re-trained in WHS issues related to their Task or Work Activities as identified in the Safe Work Method Statements. All persons acting in supervisory and managerial roles must be competent in SWMS and WHS-trained to carry out their roles including approved First Aid courses.

### **Refresher Training**

Refresher safety training will be provided to employees where a deficiency in knowledge or training has been identified as well as loss of their hard hat induction sticker for identification purposes.

#### **3.2.3 Site Specific Induction**

All personnel shall undertake a Site Specific Induction, to be conducted by the On Site Construction Manager. This induction will address all the requirements of the Model Code of Practice: Construction work 2024. The Induction is based on the risk analysis and awareness briefing documents prepared for the site, identifying hazards associated with the site and tasks, and the control measures to be implemented. The developed General Site Rules (which include safety issues) for the project shall also be communicated to all personnel as part of the induction. The attendees' (employees and subcontractors) signature on the form shall act as the record of their attendance.

The QHSE Manager, in consultation with the Project manager and On Site Construction Manager, will regularly review and update Site Specific Induction content to ensure that it is current and relevant to the changing work site.

### **3.3 Provision of Personal Protective Equipment**

All Bradfield Corporation employees on site are issued with Personal Protective Equipment, which is to be worn or used in the correct manner, as required.

By definition; Personal Protective Equipment includes, but is not limited to:

1. High visibility work shirts
2. Hard hat
3. Broad brimmed hat
4. Safety goggles/glasses
5. Ear muffs
6. Dust masks
7. Gloves
8. Sunscreen

Additional PPE may be identified in Safe Work Method Statements or by employees for a particular task/activity, which will be provided as and when required.

Employees are not to commence activities without the necessary PPE.

All subcontractors are responsible for providing all workers on site under their contracted works, with PPE as per the task specific SWMS and legislative requirements.

### 3.4 Site Safety Rules

General Site Rules are developed for the Project and are communicated to all personnel. It is a condition of entry to the site to follow all the posted site safety rules. Personnel found violating these rules shall be given :

1. Verbal warning - 1<sup>st</sup> Instance
2. Written warning – 2<sup>nd</sup> Instance
3. Non-Conformance/ Penalties/ Terminated from site – 3<sup>rd</sup> Instance.

The General Site Rules will be on display at the site entrance and on the safety notice board.

### 3.5 Toolbox Talks

The On Site Construction Manager will conduct Toolbox Talks; whenever a change occurs in working conditions on site, on a needs basis and/or at least Fortnightly. Minutes shall be taken and signed off by participants using the form *Toolbox Meeting Record*. Any corrective/preventive actions or suggested improvements will be followed up and signed off by the nominated person, in accordance with the relevant system procedures.

Worker involvement is essential in identifying potential hazards that can be eliminated, or minimised, before injuries occur. Toolbox Talks, together with the Hazard reporting system, are to be used to help supervisors manage quality, environment and safety issues, to provide a forum for employees to have their say about these issues and to help ensure an awareness is maintained throughout the project. Where required specific issues will be raised, incidents reviewed, Safe Work Method Statements developed and presented for evaluation and familiarisation or safety alerts discussed.

Subcontractors will attend Toolbox Talks as part of the consultation process to ensure that any quality, environment and safety issues can be discussed between all parties involved in the project.

### 3.6 Pre-Start Talks

The On Site Construction Manager will provide all trades the site specific conditions prior to each working day. As part of the site conditions, quality, health, safety, and environmental conditions will all be communicated as well as site access, recent incidents and current events affecting the site.

Each day a trade is on site, the supervisor will complete the *Sub-contractor Pre-Start Talk Form* including any of their trade specific site conditions, conduct a talk and have it signed by all of their workers. This form is then required to be handed in to the On Site Construction Manager to be recorded. This form will also help in the communication of information from trades to Bradfield Corporation management. Any relevant conditions will be included in the next days Pre-Start Talk for all trades.

## 4 PROCUREMENT: SUBCONTRACTING AND PURCHASING

All Subcontractors/Suppliers engaged on this project shall work under the requirements of this Integrated Management Plan. The Project Manager shall be responsible for instructing suppliers in system requirements, and for monitoring of implementation. The Project Manager is also responsible for monitoring subcontractor/supplier performance to the system requirements.

### 4.1 Engagement of Subcontractors and Suppliers

Engagement of subcontract services is the responsibility of the Project Manager and is the result of a managed and documented process. The Project Manager is also responsible for assessing and monitoring the capability of Subcontractors and Suppliers and verifying that they meet all QHSE requirements.

The following defines the process to be followed when engaging suppliers for this project:

	<b>PROCUREMENT REVIEW &amp; CONTROL</b>	<b>RESPONSIBILITY</b>	<b>TIMING</b>
1	Determine products to be purchased, work to be subcontracted and requirements for verification / audit	Project Manager	Start-up
2	Confirm materials/equipment supplied and conformance to project specifications	Project Manager/ Construction Manager	Start and during works
3	Obtain conformance certificates for supplied material	Construction Manager	Prior to incorporation
4	Determine extent of verification to be carried out on identified Supplier or Subcontractor (identify relevant process control documentation)	Project Manager	Before commencing work
5	Identify induction/training requirements	Project Manager	Before commencing work
6	Implement surveillance activities	Construction Manager	During work

The Project Manager provides Subcontractors/Suppliers with the parts of this Integrated Management Plan that are relevant to the work that they will be performing, as well as with any updates throughout the project. Similarly, the Project Manager will ensure that Subcontractors/Suppliers submit their Site Specific Management Plan and Safe Work Method Statements prior to commencing work on site. Those documents will be reviewed as stated in *Section 5* to ensure that they are appropriate.

### 4.2 Engagement of Suppliers

The Project Manager and their team will assess suppliers based on demonstrated capability and competency, past performance and quality of past work and possession of recognized corporate accreditations and credentials. Suppliers with proven track records of reliably performing on projects of similar sizes will always be preferred.

### **4.3 Monitoring of Subcontractors and Suppliers**

Subcontractors compliance with quality, safety and environmental issues is monitored throughout the project using ITPs, Task Observations, Subbie Trackers, Site Inspections and EHS Walks, and they are given an Evaluation at the completion of the project. If subcontractors are not performing adequately they may be replaced as a last resort at the discretion of the Project Manager, Construction Manager.

Suppliers are evaluated and selected on the basis of their ability to meet procurement requirements in relation to quality, pricing, performance, capability, and any OHS and environmental requirements relevant to the supply.

The extent of control exercised over suppliers is defined depending upon the type of product or service they provide.

A register of approved suppliers is maintained including relevant records which show the basis of evaluation and approval.

Approved suppliers are assessed periodically for their ability to meet quality requirements, delivery dates, price, service and any technical criteria related to the procurement.

## 5 WHS AND ENVIRONMENTAL HAZARD AND RISK CONTROL

### 5.1 Work Activity Risk Assessment and Control

Prior to commencement of the works, Bradfield Corporation will identify the EHS hazards and risks associated with the works packages outlined in Section 1.1 of this Plan. All high risk activities – as defined by SafeWork NSW – will require a site specific Safe Work Method Statement to be developed by the work package Subcontractor in conjunction with Bradfield Corporation project staff.

During the initiation stage of the project, an initial risk assessment is undertaken to identify potential hazards across all trades. This then assists in the development of the Safety and Environmental Risk Register mentioned in *Section 5.2*.

Typically as the project progresses, new hazards and risks will emerge. These will be identified by the On Site Construction Manager during daily surveillance and monitoring, from Site Inspections and EHS Walks, the QHSE Manager on regular inspections, as well as generally by all site personnel, including Bradfield Corporation staff and Subcontractors, who are encouraged to identify, eliminate if possible, and report any hazards and risks immediately. They are to report the hazard or risk to the On Site Construction Manager who will record it through site observations and Incident Report Forms. The On Site Construction Manager is responsible for using the risk matrix included in Appendix C to assess the hazard and identify controls to reduce the hazard, if further action is necessary, the QHSE Manager may be contacted to assist in implementation of the correct controls. The controls implemented should be as high as possible in the Hierarchy of Controls located in section 5.1.2 of this plan. The On Site Construction Manager, Project Manager and QHSE Manager; are responsible for issuing a Non-Conformance if necessary and updating the SWMS and Project Risk Assessment appropriately.

#### 5.1.1 High Risk Activity SWMS

##### 5.1.1.1 Development of Safe Work Method Statement/s (SWMS)

SWMS must be prepared and implemented for all site work activities under the control of Bradfield Corporation and assessed as having high safety WHS risks. SWMS are developed by the Project Manager, in consultation with the On Site Construction Manager, workers and other PCBUs involved in the project, to help improve, and encourage their ownership of the required actions and procedures in the Statements.

NSW authorities define 18 activities as “high risk construction work” under the Work Health and Safety Regulation (NSW) 2017, clause 291. Of these, the following activities have been identified as being present on this project;

- (a) involves a risk of a person falling more than 2 metres, or
- (g) is carried out in or near—
  - (i) a shaft or trench with an excavated depth greater than 1.5 metres, or
  - (i) is carried out on or near pressurised gas distribution mains or piping, or
  - (k) is carried out on or near energised electrical installations or services, or
  - (m) involves tilt-up or precast concrete, or
  - (n) is carried out on, in or adjacent to a road, railway, shipping lane or other traffic corridor that is in use by traffic other than pedestrians, or

(o) is carried out in an area at a workplace in which there is any movement of powered mobile plant, or

All Subcontractors performing works as described in the above situations must provide a project specific SWMS to Bradfield Corporation at Contract, which is then reviewed by the QHSE Manager and On Site Construction Manager and further consultation with workers undertaken as necessary.

#### **5.1.1.2 Evaluation/Review of SWMS**

The QHSE Manager is responsible for reviewing all SWMSs submitted by Subcontractors at Contract. Where job steps or site conditions change from those planned, the QHSE Manager is responsible for ensuring all SWMSs are updated prior to work commencing on site.

When reviewing SWMS, the Controls identified should be as high as practicable in the “Hierarchy of Risk Controls” guide shown in section 5.1.2 of this plan and all items on the SWMS Review Checklist, included as Appendix D should be addressed.

In line with Bradfield Corporation protocols for the engagement of Subcontractors, no Subcontractor will be allowed to commence works on site until a satisfactory site-specific SWMS for the activity has been reviewed and accepted by the On Site Construction Manager and been documented in the site files.

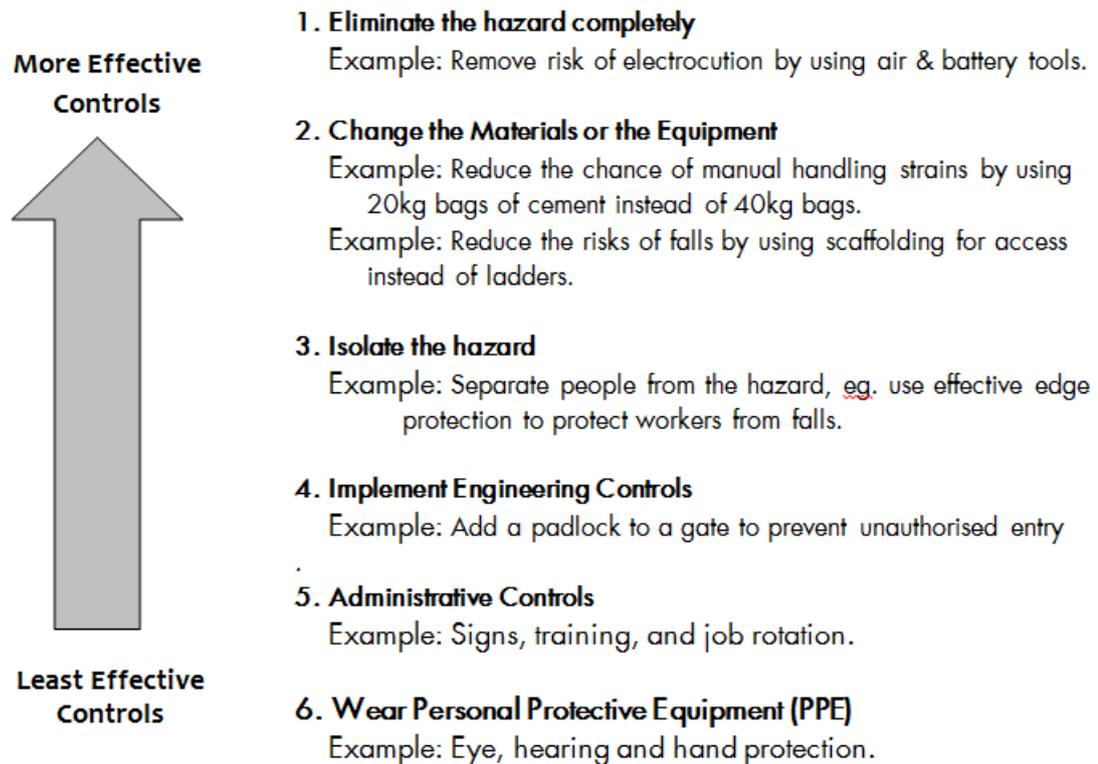
#### **5.1.1.3 Communication and Monitoring of SWMS**

The On Site Construction Manager is responsible for communicating SWMS, ensuring that all employees and Subcontractors have read and understood the relevant site-specific SWMS prior to commencing work on site. This provides for ongoing consultation and cooperation between the employees and or subcontractors so that when work overlaps, each person is aware of other construction activities and can control any associated hazards and risks.

The QHSE Manager and On Site Construction Manager are responsible for conducting regular reviews of SWMS, in the form of Task Observations, while work takes place on site to ensure employees and Subcontractors are adhering to the risk control procedures identified in their SWMS. Any unsafe practices or other deficiencies are noted as a Task Observation in Procore. Corrective measures, which may involve retraining of staff, are taken as necessary.

### **5.1.2 Site Risks**

All site risks that do not pose high safety risks, and therefore do not require SWMS, have been addressed employing a Risk Assessment Matrix methodology to identify and analyse the risk, and then nominate controls to mitigate the risk to a more acceptable level in accordance with the following ***Hierarchy of Controls***.



**NB:** In some cases a combination of control measures may need to be used.

## 5.2 Safety and Environmental Risk Register

For this site, a Project Risk Assessment will be conducted in line with all previous assessments and site investigations, in addition to identifying risks associated with construction activities. This process will establish a site-specific Safety and Environmental Risk Register. The register will remain dynamic throughout the project and will be reviewed as necessary, including following process changes, incident reviews, or the introduction of additional tasks. A copy of the register will be maintained on site for reference by all personnel.

The Risk Register details identified hazards, their risk rankings, the controls to be implemented, and the resulting residual risk. A soft copy of the Project Safety and Environmental Risk Register can be requested at any time and is always available in the site office. It will also be included as part of Appendix C.

## 5.3 Environmental Hazard Assessment and Control

Environmental hazards have been identified in relation to the activities that will be carried out as part of the project. The following areas have been considered;

- Erosion and Sediment
- Noise and Vibration
- Waste

- Dust
- Hazardous Chemicals
- Dangerous Goods
- Stormwater
- Temporary Sewage Systems

Section 13 of this plan - the Environmental Management Plan for this project - identifies the environmental impacts construction activities may have and nominates the appropriate control measures. It is updated during the project as necessary whenever new hazards emerge. Regular Site Inspections and EHS Walks are conducted in order to ensure the implemented controls are maintained in place throughout the progress of the project.

#### **5.4 Permit to Work Procedures**

Hot Works Permit is required for works involving hot works including welding or grinding. A Confined Spaces permit is required for all works which will be conducted inside a confined space. A Ground Penetration Permit is required any time a subcontractor will be trenching, excavating or coring below the depth of 300mm with notification of services to be communicated at this time. A Working at Heights Permit is required for any work performed at height where there is a risk of falling, including scaffolding, elevated platforms, or roof works. An Electrical Work Permit is required for all work involving electrical systems, including installation, maintenance, or isolation of electrical equipment.

These permits are given to ensure relevant workers are provided suitable and adequate information, training and instructions in relation to the hazardous task they are undertaking. These permits also ensure correct planning and awareness is in place from the On Site Construction Manager prior to commencement of works.

Activities that require a permit will be identified by the On Site Construction Manager who will issue the permit to Subcontractors prior to the works commencing on site. These permits are valid for a maximum of 24 hours, therefore works longer than 24 hours will need multiple permits.

We have identified Hot work permits, Confined Space Permits, Ground penetration Permits, Working at Height Permits and Electrical Work Permit to be the main permits required in relation to the construction of the **135 Badgerys Creek, Bradfield**.

## 6 SITE INSPECTIONS , REGISTERS, TESTS, AUDITS AND REPORTS

### 6.1 Site Inspections

Site Inspections are conducted weekly by the On Site Construction Manager and the QHSE Manager, to ensure a safe and hazard-free working environment. The inspection covers WHS and environmental aspects of all the work conducted on site including: the working environment, plant, environmental controls and activities. Inspections include, but are not limited to; general site safety, safety and environmental controls, plant and equipment, electrical tools and leads, traffic and public access control as well as hazardous/dangerous materials.

Where safety and/or environmental issues identified to have an imminent impact on the safety of employees or the environment, the Project Manager will be informed and all related work activities will stop until the issue is rectified and it is considered safe to continue. Using the Observation tool via Procore, the On Site Construction Manager will nominate the person to action the identified issue, who is responsible for closing out the issue and the date by which that has to occur.

A Site Instruction for non-conformances may be issued depending on the severity of the issue, with issues to be corrected within 24 hours. The On Site Construction Manager or QHSE Manager may issue a Non-conformance Report for issues requiring more time to resolve. This process is to be overseen by the Project Manager.

Records of all Site Inspections are kept in Procore Inspections tool, with action items being tracked through the Observation tool.

### 6.2 Task Observations

The On Site Construction Manager and QHSE Manager shall periodically conduct work activity checks at times where activities are actually being carried out in the field. These checks cover employees and subcontractors and will verify whether the procedure followed for doing the work is consistent with the Safe Work Method Statement. The Site Foreman shall take note of any unsafe practices or other deficiencies in the Task Observation tab via Procore and will distribute to include the Project Manager. Corrective measures shall be taken as necessary. These may involve retraining of staff.

### 6.3 Control of Plant and Equipment

Plant and equipment is subject to regular inspections on site in order to minimise the potential for accidents, minimise impacts on the environment, service and maintenance of plant and safety of work crews are maintained.

The On Site Construction Manager is responsible for ensuring incoming plant goes through an initial check using the *Plant and Equipment Pre-Start Check Form* and ensuring it is checked by the Plant Operator prior to use daily using logbooks and Pre-start checklists dependant on the plant.

To ensure plant is safe throughout the project, plant has to be checked by the QHSE Manager during the monthly site audit, therefore, plant being checked every month it remains on site.

From the inspection, if repairs or maintenance are required, the On Site Construction Manager will notify the Project Manager. If it is a safety hazard or requires immediate repair, then the machine must be parked up, marked as 'out of service', and shall not be used until the necessary repairs have

been verified by the Maintenance Provider. Details of identified defects and repairs to plant will be recorded *Plant and Equipment Maintenance Register* and filed on Procore for Office use.

These checklists and procedures apply to Bradfield Corporation plant and equipment, subcontractor plant, as well as hired plant and equipment.

#### **6.4 Test and Tag Register**

All Bradfield Corporation and Sub-contractor electrical equipment including leads, power tools, battery chargers, junction boxes or residual current devices are inspected and tested by a suitably qualified person and labelled with a tag of currency before being used on site. This will be recorded on the Test and Tag Register and filed on site on each respective subcontractor file.

All subcontractors must provide test and tag registers from a at the beginning of each month for all their relevant power items. These tests will be recorded on the Test and Tag Register and filed on site on each respective subcontractor file.

#### **6.5 Asset register**

All Bradfield Corporation assets on site will be tracked by the On Site Construction Manager on the Asset Register form which includes the Serial Number and condition of each item and who it is assigned to. This register is filed in the Bradfield Corporation site folder for review by the QHSE Manger monthly. These items are then tracked on a company basis and recorded for HSE and insurance purposes.

#### **6.6 Site Audit – IMS & QHSE**

The QHSE Manager conducts a site audit monthly to identify any gaps in compliance, health, safety and environmental hazards, subcontractor quality/ ITP performance and to consult with site personnel needs. The audit is completed per the Monthly Site Audit Checklist in conjunction with the Site Inspection. This audit tracks the flow of information from the office to the site, quality assurance and identifies physical HSE hazards on site.

These results assist in the formulation of a monthly report which includes both qualitative and quantitative data, communicating clear information to the project manager and project director, in order for them to make fully informed decisions on QHSE matters.

#### **6.7 Quality Control – Inspection + Testing**

##### **6.7.1 Material Selection**

All material on site must be reviewed and approved by Bradfield Corporation prior to ordering and installation. This will be done through Design Meetings, site meetings, sample inspections and email. Factors to be considered in the decision making process are cost, serviceability, quality, installation requirements, health and safety effects of the material on workers and future tenants; and environmental affects the material may have in all stages of its lifecycle. Personnel within Bradfield Corporation who will decide on the preferred material are the Project Manager, Construction Manager and/or Project Director.

### **6.7.2 Sample Inspections**

Where samples of materials to be used for the project must be approved, the Project Manager, Construction Manager and/or Project Director will arrange a meeting prior to ordering. Approval will be recorded with all the material details recorded and a photographic record taken. This will usually be performed by the Project Manager. All regular material selection criteria will be considered during this process.

### **6.7.3 Inspection and Test Plan**

A Master ITP Register will be created for the Project and will be created to map all inspection requirements according to the scope, design and installation guides as well as compliance with Australia Standards. All the works to be performed within the scope of the project are tracked through use of the *Master ITP Tracker* to ensure that all critical activities are verified, inspected and authorised at relevant stages of the works. Sub-contractor ITPs are provided to Bradfield Corporation within 5 days of receiving the letter of award. Each ITP should specify which drawings are being worked off at the time of installation on a Drawing Register or similar.

A more detailed ITP is developed for each task for use by Bradfield Corporation site personnel to enable sign off at all stages of installation. Plans will be reviewed and updated where necessary throughout the life of the project with the inclusion of health, safety and environmental elements on all ITPs, as well as inspections, certificates and testing. This process is overseen by the QHSE Manager and reviewed regularly by the Project Manager.

#### **In Process Inspection and Test**

Bradfield Corporation will perform in process inspection and testing throughout the project through monitoring of subcontractors and conducting witness points at key stages of the works. The On Site Construction Manager is responsible for verifying or witnessing these inspections along with obtaining any test certificates or written approvals, which are itemised on the ITP or required by the specification.

Sub-contractors will complete and hand over each unit separately unless otherwise specified. When they have handed over and believe their task is ready for sign off, they will provide the completed ITP to the On Site Construction Manager. Bradfield Corporation personnel will then go through the process of ITP sign off prior to signing of the sub-contractor ITP.

#### **Final Inspection and Test**

The inspection and test plans shall identify a final inspection and test point within a task. The On Site Construction Manager and the client, where requested, shall review all the inspection and test points, records, certificates, checklists, delivery docket and any other acceptance criteria specified prior to the final inspection being approved. Only when that evidence has been provided will the task be deemed to be complete.

#### **ITP's and Payment Claim Approval**

All ITPs must be provided at time of Payment Claim as proof of completion and quality for works as stated in the contract *Payment Claim Procedure*. All associated documentation and records of operation will be gathered, maintained and available for audit.

#### 6.7.4 Control of Non-conformances

Non-conformances can be identified through the appropriate application of process control, including ITPs, Site Inspections, Task Observations and Site Audits. Any items of works or processes found to be nonconforming shall not be accepted and shall be identified as a non-conformance by the On Site Construction Manager, QHSE Manager, Construction Manager and Project Manager. The process shall not continue until the non-conformance has been effectively resolved.

The following process shall be used by Bradfield Corporation for the control of nonconformances identified by these processes during this project.

1. Where the non-conformance is detected and has been rectified immediately, a note shall be made in the diary of the On Site Construction Manager.
2. Where a non-conformance is detected that cannot be immediately rectified, the person identifying the problem shall issue a *Non-Conformance Report (NCR)* to the person responsible, identifying the nature of the problem, the action required to fix it, and the timetable for completion. Upon rectification, the site shall be re-inspected and the details of the inspection recorded on the *Non-Conformance Report (NCR)*, which shall then be placed in the project file.
3. Where there is a recurring site problem, or the nonconformance requires agreement of the Client (for either a use as is disposition or agreed repair), then the incident shall be documented on a *Non-Conformance Report (NCR)* by the person finding the problem. The Project Manager shall review and agree the required action prior to submission to the client for their agreement. A penalty may be imposed on the offending party depending on the severity and cost impacts to Bradfield Corporation.
4. Bradfield Corporation reserves the right to issue a non-conformance on the initial occurrence if it is deemed to be a serious enough incident according to the Risk Matrix. If lower on the risk matrix but still serious enough to give a warning, an *Improvement Notice* may be issued.

All *Non-Conformance Reports* shall be maintained within the Sub-contractor files to record the identification and disposition of all nonconformances. Communication of both Improvement Notices/warnings and NCR's will be done via email and/or Procore. All records will be kept on file and reviewed upon any future tender panels in order to consider all Quality, Health, Safety and Environmental factors. All Improvement Notices and Non-Conformance Reports will be discussed at all Site Meetings and when necessary Trade Co-ordination meetings in order to communicate and improve all systems and processes with uniformity.

#### 6.8 Reporting

Initial reports for ITP, Internal audits, Site Audits and other QHSE items will be compiled and reported to the Project Manager on a monthly basis. The Project Manager will report information regarding inspections, tests and audits to the Superintendent at Project Control Group meetings, site meetings or through email correspondence.

## **7 EMERGENCY RESPONSE PLAN**

The Bradfield Corporation Incident Response and Reporting Procedures will be located in the QHSE Management Manual, on the Procore filing system, as well as being posted in the site office. These procedures are reviewed systematically every 6 months or following any incidents in order to ensure continuous improvement and quality Health and Safety provisions.

Emergency preparedness procedures shall be reviewed at regular Management Review meetings, and whenever an Emergency incident has occurred. Any updates or changes to the Evacuation Plan, emergency equipment or procedures will be communicated at a Toolbox Talk and incorporated in Site Induction.

### **7.1 Emergency Preparedness**

#### **7.1.1 Emergency Contacts Internal/External**

All External Emergency Contacts and authorities, utilities and service providers, emergency services and their nearest locations are located on the emergency Evacuation Plan throughout the construction site. These are updated as necessary as the structure progresses or contact details change. First point of contact Internal Contacts are also located on the Emergency Evacuation Plan.

All Bradfield Corporation personnel and sub-contractors are able to access the site contact list via Procore which will include live updates as contracts are awarded and/or if site personnel changes.

#### **7.1.2 Site Inductions**

The On Site Construction Manager or suitable delegated Bradfield Corporation representative will induct all sub-contractor, site personnel and Bradfield Corporation staff prior to commencement on site. Site Induction includes all necessary details about the Evacuation Plan, site access/egress, the location of onsite emergency equipment and the emergency procedures established for the site so they are able to respond effectively to any health, safety or environmental emergencies and/or evacuations that may occur.

#### **7.1.3 Site Induction Register**

A site induction Register is kept current recording all workers whom have been inducted in the life of the site. This Register is recorded in Hard Hat sticker order to allow easy access for identification in time of an emergency or incident. This register contains; hard hat sticker numbers, personnel contact details, and emergency contact details as per their induction form. If there are any changes to emergency contact details the subcontractors are instructed to change this on site. A soft copy of all induction forms and Induction Register is kept on Procore at all times in case of loss or damage of the hard copy.

#### **7.1.4 Sign In/Sign Out Register**

A sign in/sign out register is kept at the entrance of site for use by all workers and visitors. This should be completed in the morning including the hard hat sticker number and then completed upon leaving site. This document is taken in case of emergency as a proof of personnel on site that day. This process is communicated daily through pre-start talks and fortnightly through toolbox talks.

## 7.2 Emergency Equipment

Equipment for responding to emergencies is located in the Site Office and at other points on site, with a register of emergency equipment including their locations kept in the Site Office and changes in locations noted on the Emergency Evacuation Plan.

## 7.3 Evacuation Plan

The Evacuation Plan will be displayed in the project site office, at the site entrance and other appropriate prominent places including on each level of each stairwell and is shown and explained to workers during the Site Induction. Any changes to the Evacuation Plan are made by the QHSE Manager and are communicated to all site team members in pre-start talks and toolbox talks.

Refer Appendix I.

### 7.3.1 Emergency Procedure

Upon hearing the evacuation air horn, workers are to evacuate the building and meet at the agreed Emergency Meeting Point as shown on the Emergency Evacuation Plan.

#### Supervisor's Evacuation Procedure

1. Ensure all staff and visitors move quickly and sensibly to the nominated assembly point (insert assembly point here) not stopping or detouring for any reason,
2. Ensure First Aider is giving First Aid to the level of his /her training,
3. Dial 000 or (112 for mobile phones),
4. Nominate emergency service(s) required: Ambulance, Fire Brigade, Police,
5. Provide: name of organisation, nature of emergency, road name, locality, nearest cross street, number of people trapped or injured, number people missing, If a spill: Quantity, Chemical, UN number and Hazchem code, other problems e.g. fire, risk of fire, fallen power lines, flood

Do not leave the assembly area or re-enter the building/jobsite until instructed that it is safe and the "All Clear" has been given by the chief fire officer/police officer in charge of operations.

Once the 000/112 call is completed and all people are safe, notify the QHSE Manager and Project Manager who will in turn inform the Superintendent.

## 7.4 Emergency Procedures

In the event of an incident the safety and welfare of all people involved is our first priority.

The following actions must be followed by site personnel upon occurrence of specific emergency:

### Fire

1. Rescue any person(s) in immediate danger only if safe to do so
2. Call the Emergency services on 000 if instructed to do so
3. Contain: Close doors to contain the fire where possible
4. Extinguish: Attempt to extinguish the fire only if trained and it is safe to do so
5. Evacuate the area immediately
6. Go to the nominated Evacuation area

7. Report to the On Site Construction Manager or Fire Warden
8. Do not return to work area until instructed

### **Electrocution/ Electric Shock**

1. Notify the On Site Construction Manager immediately
2. Do not touch any wiring at that location
3. Call Emergency services on 000
4. Carry out CPR on the injured person if required and only if trained
5. Barricade off the area
6. Do not return to work area until instructed

### **Medical Emergency**

Medical emergencies include burns, cuts, poisoning, injury due to trips, falls, traffic accident, etc.

1. Apply first aid if possible, and only if trained
2. Notify the On Site Construction Manager and Project Manager of the incident
3. Call Emergency services on 000 if necessary

### **Collapse or malfunction of plant**

1. Check no persons are injured in the plant, if so call Emergency services on 000
2. Move away from the immediate area of danger
3. Notify the On Site Construction Manager of the incident
4. Barricade off the area if plant has collapsed
5. Set up spill kits if required

### **Chemical spills (onto land or waterways)**

Includes chemicals and fuel spillage from machinery, pumps, plant, tankers, storage bunds, refuelling operations, etc.

1. Cease the work causing the emergency or environmental incident
2. Notify the On Site Construction Manager of the incident immediately
3. Where possible, contain the spill as per the relevant MSDS instructions
4. Keep clear of the area until spillage is cleaned up
5. Follow Incident & Injury Investigation & Reporting Procedure

### **Other Emergencies**

Other potential emergency situations such as aggressive behaviour, gas leaks, civil , severe storm damage, failure of sediment control measures, etc. are notified to the On Site Construction Manager and Project Manager.

## Supervisor's Procedure

1. Sound *Evacuate Now* warning
2. Ensure all staff and visitors move quickly and calmly to the nominated Assembly Point, not stopping or detouring for any reason
3. Ensure First aid kit, *Sign In/Sign Out Register* and *Site Induction Register* is obtained prior to assembly
4. Ensure all staff and visitors are accounted for at the assembly area using the *Sign In/Out Register*. Contact any missing personnel using the *Site Induction Register*.
5. Ensure all staff and visitors are accounted for at the Assembly Point
6. Ensure First Aiders are giving First Aid to the level of training
7. Dial 000 or (112 for mobile phones)
8. Nominate emergency service(s) required: Ambulance, Fire Brigade, Police
9. Provide: name of organisation, nature of emergency, road name, locality, nearest cross street, number of people trapped or injured, number people missing, If a spill: Quantity, Chemical, UN number and Hazchem code, other problems eg. fire, risk of fire, fallen power lines, Flood
10. Do not leave the Assembly Point or re-enter the building/jobsite until instructed that it is safe and the "All Clear" has been given by the Chief Fire Officer/Police Officer in charge of operations.

Once the 000/112 call is completed and all people are safe, **Notify Safe Work NSW 131 050**

## 7.5 Emergency Response Testing

Testing is conducted at least once per 30 days of onsite activity. This is recorded by the On Site Construction Manager in the Site Diary noting date and time, with all participant details recorded using *Emergency Evacuation Drill – Record of Participants*. Results from tests will be discussed with all site personnel at the next Toolbox Talk to improve emergency response performance.

## **8 INJURY AND INCIDENT MANAGEMENT**

The first point of contact following any incident is the QHSE Manager who is able to give detailed and informed advice to site personnel in the event of an accident or incident. If emergency services or the client are required to attend an incident, the Project Manager shall be the point of contact for all communications. The QHSE Manager is kept abreast of any situation in order to give necessary advice on all aspects and controls.

### **8.1 WHS Incident Management**

#### **8.1.1 Emergency Response Procedure**

Bradfield Corporation Incident Procedures for Incidents are detailed in section 7.3. All documentation is managed by the QHSE Manager as the first point of contact in any incident.

#### **8.1.2 First Aid**

All injured employees will receive appropriate First Aid or medical treatment by suitably trained First Aiders as soon as practicable.

The qualified First-Aid person on this project site is as per the Site Contact List.

#### **8.1.3 Injury Reporting**

All injuries will be reported in the first instance to the On Site Construction Manager or a First Aid Officer. Injuries are recorded using Injury/ Accident Report. All records are kept on a master database which has a separate ordered file for each incident. All incidents, actions, further actions and resolutions are tracked on the Incident/Improvement Register. These records are kept for a minimum of 7 years.

The QHSE Manager is responsible for notifying Safe Work NSW immediately should the injury require hospitalisation, or for all other injuries it will be included at the next site meeting. All incidents will also be discussed at the next toolbox meeting and reported in the monthly QHSE Report.

The QHSE Manager is responsible for collecting information and statistics on WHS incidents and injuries, however, it is the On Site Construction Managers responsibility to relay this information to employees and sub-contractors at a Toolbox Meeting following an incident, together with action taken and preventative action/changes in processes.

#### **8.1.4 Injury Investigation**

All incidents are followed by completion of an Incident Improvement Report which investigates and identifies improvements and further preventative control measures which may need to be put in place.

#### **8.1.5 Ongoing Injury Management**

The injured employee must nominate a treating doctor who will be responsible for the medical management of the injury.

#### **8.1.6 Return to Work**

Bradfield Corporation is committed to the return to work of injured employees. As part of this commitment, the company will act in accordance with Bradfield Corporation - Workers Compensation and Rehabilitation Policy and:

1. Support the injured employee and ensure that early return to work is a normal expectation

2. Participate in the development of an Injury Management Plan and ensure that injury management commences as soon as possible after an employee is injured
3. Provide suitable duties for an injured employee as soon as possible
4. Ensure that our injured employees (and anyone representing them) are aware of their rights and responsibilities – including the right to choose their own doctor and rehabilitation provider, and the responsibility to provide accurate information about the injury and its cause
5. Consult with employees and, where applicable, Unions to ensure that the Return-to-Work Program operates as smoothly as possible
6. Maintain the confidentiality of injured employee's records.
7. Not dismiss an employee as a result of a work related-injury within six months of becoming unfit for employment

A suitable person will be arranged to explain the Return to Work process to the injured employee. The injured employee will be offered the assistance of a WorkCover accredited rehabilitation provider if it becomes evident that they are not likely to resume their pre-injury duties, or cannot do so without changes to the workplace or work practices.

## 8.2 Environmental Incident Management

### 8.2.1 Definitions

An **Emergency Pollution Event** is an event involving the escape of dangerous goods or hazardous materials which by either their concentration and/or volume, have the potential to damage the environment.

**Dangerous Goods** are materials which, if released or spilled, will impact on the environment or person immediately.

**Hazardous Substances** are materials which if released or spilled, will eventually, but not immediately, impact on the environment or person.

**Fuel** includes diesel and petrol.

**Minor spills** are those of quantities 200 litres or less that are situated away from waterways. If spill occurs above water or near water with the potential of entering the waterway, quantities less than 1 litre will be classified as a minor spill. Minor spills are reported internally by Bradfield Corporation on the *Incident Investigation Report* form.

**Major spills** are those of quantities greater than 200 litres that are situated away from waterways. If spill occurs above water or near water with the potential of entering the waterway, quantities greater than 1 litre will be classified as a major spill. Major spills are managed via the form *Incident Investigation Report* and reported to the Client and/or relevant authority. (Note: EPA 131 555)

**OEH (Office of Environment & Heritage NSW) Reportable Incident** is an incident or set of circumstances during, or as a consequence of which there is, has been or is likely to be: a leak, spill or other escape of a substance, as a result of which pollution has occurred, is occurring or is likely to occur; or, material harm to the environment, involving actual or potential harm to health or safety of human beings or to ecosystems, that is not trivial.

### 8.2.2 Environmental Incident Reporting

A notifiable environmental incident is an event involving the escape of dangerous goods or hazardous materials which by either their concentration and/or volume have the potential to damage the environment as defined by the *Protection of the Environment Operation Act 1999* (POEO Act) and amendments in 2011.

If the incident presents an immediate threat to human health or property the On Site Construction Manager will Call 000 and nominate the service required (Fire and Rescue NSW, the NSW Police and/or the NSW Ambulance Service). The On Site Construction Manager will then notify the QHSE Manager who will then notify the following 'relevant authorities' as necessary defined in Section 148(8) of the POEO Act:

- 1) Project Manager
- 2) Local Council – ie. Appropriate Regulating body (ARA) – Liverpool City Council 1300 36 2170
- 2) Environment Protection Authority (EPA) – Environment Line on 131 555
- 3) Ministry of Health via the local Public Health Unit 1300 066 055
- 4) SafeWork NSW – phone 13 10 50
- 5) Fire and Rescue NSW – phone 000
- 6) Superintendent

All Bradfield Corporation personnel must report accidents, near misses and situations that may be hazardous for the environment. If the nature of the incident is such that the continuation of work is detrimental to the environment, then the On Site Construction Manager has the authority to stop the works until the problem is rectified.

If emergency services or the client are required to attend the incident, the Project Manager shall be the point of contact for all communications with keeping the QHSE Manager in close contact for recording and advice purposes.

Emergencies, incidents and failure of environmental protection measures shall be documented by the QHSE Manager through the *Incident Investigation Report* as well as documenting witness statements and authority communications. All incidents and near misses shall be investigated to determine the cause and identify control measures to prevent recurrence and therefore, completes the review phase of the continuous improvement process.

If there is a need for policy review due to an incident, the proper company procedure will be undertaken. Once the policy has been endorsed by upper management it will be released to all Bradfield Corporation personnel and necessary external stakeholders.

### 8.2.3 Environmental Complaints Handling

If a complaint is received regarding an environmental issue, including pollution, that is a result of the works, a written report shall be prepared by the QHSE Manager and supplied to the Project Manager/ Superintendent within one working day. This report shall include the details of the complaint, the action taken to investigate it and if necessary, the actions taken to correct the problem. An Environmental Fine/ penalty, Improvement Notice and Prohibition Notice are considered to be a type

of complaint.

A record of all complaints, using *Client & Community Feedback Form*, shall be kept. The following shall be recorded.

1. Date and time of complaint
2. Type of communication (telephone, letter, meeting, etc.)
3. Name, address and contact number of complainant
4. Nature of complaint
5. Response action taken
6. Any monitoring to confirm the complaint has been satisfactorily resolved

## 9 QUALITY, WORK HEALTH, SAFETY AND ENVIRONMENT CONSULTATION

### 9.1 Consultation Process

Bradfield Corporation is committed to protecting the health and safety of all employees and believes that a safe workplace is more easily achieved when everyone involved in the work communicates with each other to identify; hazards and level of risk, talks about any health, safety and environmental concerns, procedural improvements/ feedback, and works together to find solutions. This includes cooperation between the people who manage or control the work and those who carry out the work or who are affected by the work.

On this project, consultation will occur through four processes;

1. The Project Delivery Team will discuss QHSE issues as a standing issue during Weekly Team Meetings.
2. Site personnel will discuss any QHSE issues during daily Pre-start Talks, fortnightly Toolbox Talks and fortnightly Trade Co-ordination Meetings.
3. Upper management will review and discuss QHSE issues monthly at the Project Control Group (PCG) meetings.
4. QHSE issues will be identified daily by all personnel through Site Inspections, ITP's and Observations through Procore, emails and hardcopy where necessary.

<b>When</b>	<p>Bradfield Corporation consults with workers when:</p> <ul style="list-style-type: none"> <li>• Identifying hazards and assessing risks arising from the work carried out or to be carried out</li> <li>• Making decisions about ways to eliminate or minimise those risks</li> <li>• Risks to health and safety arising from work are assessed or when the assessment of those risks is reviewed</li> <li>• Making decisions about the adequacy of facilities for the welfare of workers</li> <li>• Proposing changes that may affect the health or safety of workers</li> <li>• Making decisions about procedures for consulting with workers</li> <li>• Resolving health or safety issues</li> <li>• Monitoring health of workers</li> <li>• Monitoring the conditions at the workplace and providing information and training for workers</li> <li>• When conducting investigations into incidents or 'near misses'</li> <li>• Deciding on welfare facilities</li> </ul>
<b>Why</b>	<p>Consultation between the Management of Bradfield Corporation and their employees in relation to QHSE issues is undertaken to enable employees to contribute to the making of decisions affecting their health, safety and welfare.</p>
<b>Who</b>	<p>Direct consultation between workers, management, supervisors, Directors</p>

<b>How</b>	<p>The agreed consultation mechanism for the Bradfield Corporation workplace is the Weekly Team Meeting and fortnightly Trade Co-ordination Meetings where Quality, Work Health, Safety and Environment is a standing agenda item as well as Daily Pre-start Toolbox Talks for changing site circumstances.</p> <p>Bradfield Corporation keeps records of all significant work health and safety issues that are discussed, actions to be taken, responsibilities and timelines for taking action. Records outlining the completed rectifications are made available through the internal communication system and further discussed at the next Weekly Team Meeting and /or Toolbox Talks. If more urgent action is required to be communicated to all employees, it is added to the Daily Pre-start Talk for all trades.</p> <p>Bradfield Corporation may also conduct surveys of its workers from time to time and undertake workplace observations.</p> <p>Consultation will also be through the direct discussions which take place as part of everyday work.</p>
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## 9.2 Health and Safety Representative/s (HSR's)

If, at any time, a worker requests an election for an HSR(s), Bradfield Corporation will facilitate the determination of the work group/s, and provide any reasonable resources, facilities and assistance that may be required to conduct the election, and provide subsequent support for the elected HSR/s, as per the *Procedure - Safety Committee*. HSR's are continuously guided by the QHSE Manager who is available at all times and the key point of contact for all QHSE issues.

Bradfield Corporation will notify SafeWork of its elected HSR/s and any deputy HSR/s through the Safe Cover online services tool <https://www.safework.nsw.gov.au/>

### HSR Training

Bradfield Corporation recognises that regulator approved Work Health and Safety Training assists Health and Safety Representative/s (HSR/s) to understand and fulfil their role and functions. HSRs are entitled to choose and attend an approved five day training course in work health and safety and a one day refresher course each year during their term of office. Regular, weekly on site training is also undertaken between the site HSR and QHSE manager to ensure sufficient review and continuous learning.

Bradfield Corporation undertakes to:

- Pay the course fees
- Pay any other reasonable costs to attend training
- Allow the HSR to attend training within three months of the request
- Allow the time weekly for training between the HSR and QHSE Manager

### Health & Safety Committee/s

Bradfield Corporation will establish a Health and Safety Committee within two months after being requested to do so by an HSR, or five or more workers at the workplace. Bradfield Corporation may also establish a health and safety committee on its own initiative at any time. The constitution of the

committee may be agreed to between Bradfield Corporation, the HSR and workers at the workplace. If agreement is not reached within a reasonable time, any party may ask SafeWork to appoint an Inspector to decide the matter.

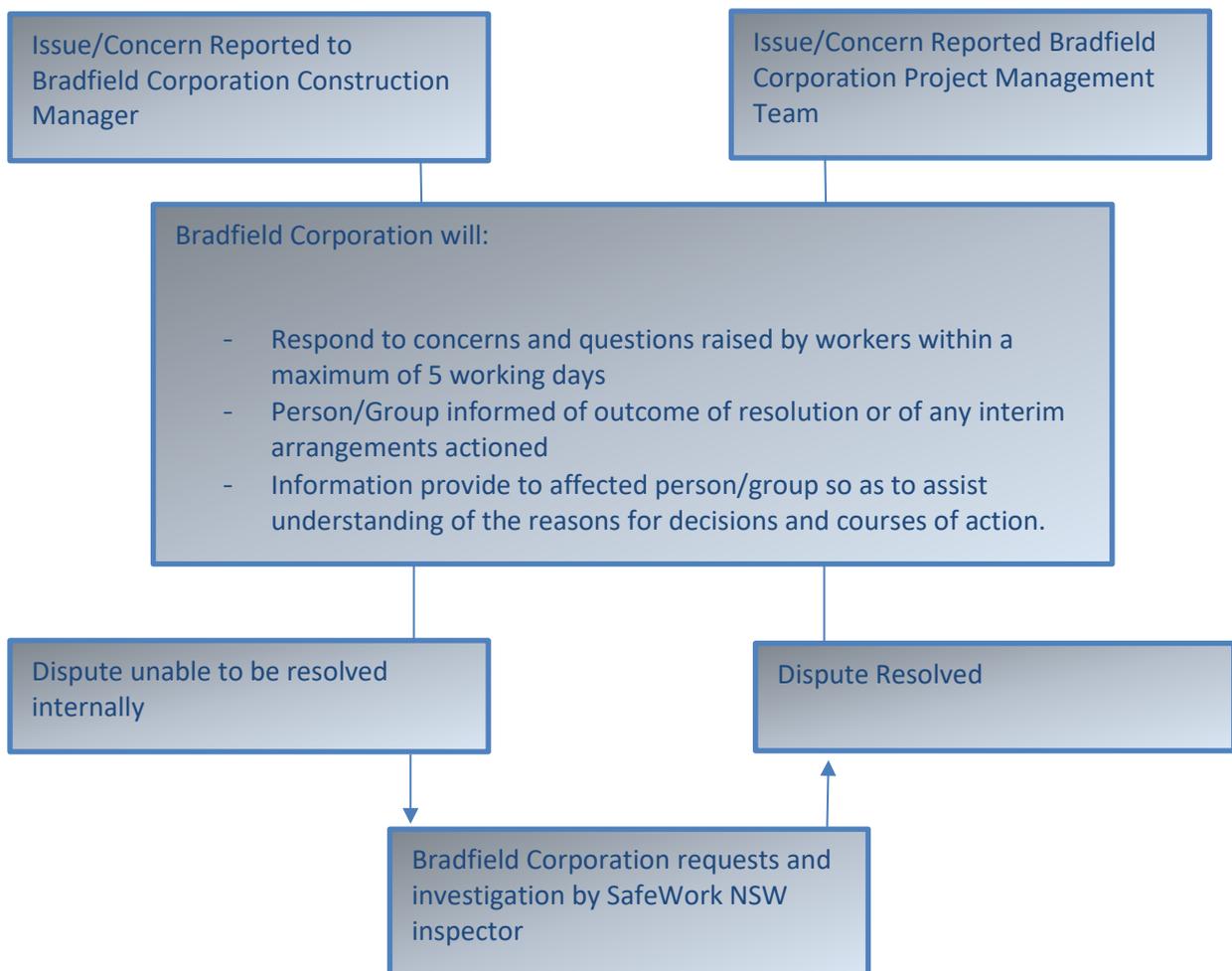
### 9.3 Advising Outcomes of Consultation

Bradfield Corporation undertakes to:

- Respond to concerns and questions raised by workers within a maximum of five working days and provide feedback about any options proposed.
- As soon as practicable, inform person/ group affected by the issue of the outcome of resolution or of any interim arrangements until the issue is resolved.
- Provide information to affected person/ group so as to assist understanding of the reasons for decisions and courses of action.

### 9.4 Site Dispute Resolution Flowchart

#### Site Dispute Resolution Flowchart



## 10 ADMINISTRATION OF THE INTEGRATED MANAGEMENT PLAN

### 10.1 Control of Documents and Records

The Integrated Management Plan shall be reviewed if changes are made to the scope of the works, or to any other requirements of the project, or if a major incident occurs. Amendments to the Integrated Management Plan shall be recorded in Revision History and Issue Details section of this document.

The Project Manager will retain master copies of controlled project documents at Head Office or at the site, when this is a requirement. Upon any revisions of the Integrated Management Plan, the reviewed edition of the plan will be released to all necessary stakeholders.

Control of records shall be in accordance with the procedure outlined in the Bradfield Corporation QHSE Management Manual. Records shall be incorporated into the project file at completion of site activities. The Project File shall be kept for a minimum of seven years after completion of site activities, and in accordance with

File and Records Management procedures.

### 10.2 Audit and Review

As part of the monitoring processes of its Integrated Management System, Bradfield Corporation carries out Internal Audits which involve Corporate Systems and project works on site. Internal Audits are conducted on a regular basis to determine that :

1. All aspects of Bradfield Corporation Management System and specified requirements are being met
2. The Integrated Management System is effective
3. Corrective actions are implemented and are effective

The procedure and timetable for Internal Audits is described in the *Bradfield Corporation QHSE Management Manual*. The results of Audits are communicated to stakeholders, discussed at project meetings, and form part of the Management Review.

Issues identified during Internal Audits are handled in accordance with Bradfield Corporation Improvements & Corrective Action procedure.

The suitability and effectiveness of the Integrated Management Plan is assessed at Management Review Meetings. This may lead to identifying areas that require additional training or system improvement.

### 10.3 Project Completion and Handover

Upon completion of the project, the Project Manager is responsible for ensuring that Project Handover Procedure is followed per the *Handover Management Plan*; and all project records are maintained to demonstrate the conformance of the works. The completion process includes:

1. Determination of types of records to be retained in accordance with File and Records Management procedures.
2. The requirements for retention of records in accordance with File and Records Management procedures.
3. The process for finalising Contract Administration issues

4. Certification
5. Design and Building quality measures, including ITP's
6. Financial management
7. The process for handing over the works
8. The process for reviewing performance of Bradfield Corporation, the Project Team, Subcontractors and Suppliers
9. QHSE Records

## **11 SITE ESTABLISHMENT**

### **11.1 Operating Hours**

Working Hours are restricted in line with SSD consent, and the requirements of Liverpool City Council

- Weekdays: 7:00am – 6:00pm
- Saturdays: 8:00am – 1:00pm
- Sundays and public holidays: no work permitted.

Working hours on the project will be in adherence to those imposed under the Development conditions. It may however be required that out of hours works are undertaken in order to reduce disruption to the public. In these cases, the works will be coordinated with the local authorities and carried out with appropriate traffic and pedestrian management measures. These requirements; including the need for permits and who is required to apply for the permits, will be discussed in face-to-face meetings with contractors and at Project Delivery Meetings OR defined in the contract of the sub-contractor. Bradfield Corporation will give notice and liaise with surrounding tenants/residents of any out of hours work unless contracted otherwise.

Any changes in the above requirements will be communicated to all workers through use of Pre-Start talks, Toolbox Talks, Trade Co-ordination Meetings, Email and Procore.

### **11.2 Fencing**

Prevention of unauthorised access to the site is a high priority and will be managed throughout the construction period. Bradfield Corporation will secure the site with Type A hoarding in high-risk zones, consisting of a minimum 2100 mm high solid timber fence. The hoarding shall be constructed of timber panels at least 17 mm thick, free of protrusions such as bolts or nails, and fixed flush and even. A minimum 1500 mm width of accessible footpath must be maintained to ensure continual pedestrian access, with consistency in quality and standard equal to that present prior to hoarding erection. The hoarding must not obstruct traffic lights or signage, and certification by a qualified structural engineer is required. Fencing arrangement, materials, and appearance will comply with standard industry practice and the Liverpool City Council Hoarding and Tower Crane Standard 2020.

Fencing locations will be subject to approval by the relevant authorities and will comply with the current Australian Standards. Appropriate safety and identification signage, lighting and signalling will be erected on these fences and hoardings as required.

Site ingress and egress will be through a freely opening fence panel that opens inwards, to be secured by padlocked chain. Only the On Site Construction Manager or suitable delegated person are authorised to open gates or move fence panels. If there is a need to move a fence panel to complete works, the On Site Construction Manager must be notified as all factors concerning Health, Safety and Environment must be taken into account.

### **11.3 Protection of Existing Trees**

Prior to the commencement of construction activities on site, all trees identified for retention in the Arboricultural Impact Assessment prepared by CPS planning dated 29 September 2025 will be protected in accordance with AS 4970 and the Protection of the Environment Act 1999. Clear signage will be displayed in a prominent location at the site entry, indicating that trees and plantings are to be protected during construction. The area within the drip line of retained trees must remain free of harmful materials, structures, vehicles, and equipment at all times. Damage to tree bark will be prevented by ensuring that no items are attached to any trees.

Tree removal will include a total of 29 trees to facilitate the proposed development works. Development consent and all relevant approvals will be obtained prior to the removal or pruning of any tree. All tree removal works must be undertaken by an experienced Arborist with a minimum AQF Level 3 qualification, in accordance with AS4373-2007 Pruning of Amenity Trees, the Safe Work Australia Guide for Managing Risks of Tree Trimming and Removal Work (2016), and other applicable legislation.

Four trees are to be retained and protected in accordance with the Tree Location Plan and Tree Protection Specifications and in accordance with AS4970-2025 Protection of Trees on Development Sites, and the specific recommendations of the Arboriculture Impact Assessment. A Project Arborist experienced in tree protection on construction sites is to be engaged prior to the commencement of any works. The Project Arborist will monitor and report regularly to the Principal Certifying Authority (PCA) and the Applicant on the condition and protection of retained trees during construction. They must also supervise and monitor all excavation, trenching, or placement of compacted fill within the Tree Protection Zone (TPZ) of retained trees.

The study area is located entirely on biodiversity-certified land under the Sydney Growth Centres SEPP 2006, certified in accordance with Chapter 8 of the Biodiversity Conservation Act (BC Act) and approved under the Environment Protection and Biodiversity Conservation Act (EPBC Act). It is also subject to the provisions of Chapter 13 of the Biodiversity and Conservation SEPP. All pre-construction and construction activities will be carried out in accordance with the measures outlined in the Biodiversity Management Plan (BMP) and associated subplans. These measures aim to prevent accidental harm to fauna during vegetation clearing and habitat modification and ensure the protection of existing trees and significant vegetation throughout the project.

### **11.4 Earthworks**

#### **In General**

Protection to ensure containment of debris and an appropriate level of protection to the public will be maintained throughout excavation. Prior to any underground work being carried out, Bradfield Corporation confirms that all services have been located using Dial Before You Dig, as precautions stated in the SafeWork NSW Guide - Work Near Underground Assets.

Dial Before You Dig

Therefore, in general all site personnel should undertake their work at the site in a manner that minimises exposure to any hazard identified which may be present in 135 Badgerys

Creek, Bradfield. Procedures to be adopted include:

1. Undertake work in accordance with NSW WHS legislation and guidelines.
2. Undertake work in accordance with Australian Environmental Protection legislation and guidelines.

Before ground excavation can commence, written approval by Bradfield Corporation On Site Construction Manager or Project Manager must be obtained in the form of a permit – Ground Penetration Works.

### **Intrusive Earthworks**

In regards to excavation, all personnel are to follow the guidelines specific to the SWMS for intrusive earthworks. Bradfield Corporation are able to put in control measures to limit the level of risk, however, the ultimate responsibility and authority for the health and safety of the individual rests with the individual themselves and their colleagues. Each worker is responsible for exercising utmost care and good judgment in protecting his/her own health and safety and that of fellow employees and the environment.

It is the responsibility of the worker to bring any observed potentially unsafe condition or situations to the attention of the On Site Construction Manager, QHSE Manager or HSR on site. These details are located on the Emergency Evacuation Plan posted on site. Should workers find themselves in a potentially hazardous situation, the worker shall immediately discontinue the hazardous procedure and take effective corrective or preventative action as per the Hierarchy of control in section 5.1.2.

The minimal level of personal protection equipment (PPE) required for intrusive earthworks at the site include:

1. First-aid kit, with eye wash bottle and manual
2. Gloves
3. Safety glasses
4. Steel-toed boots
5. Long shirt and pants
6. High-visibility safety vest

## **12 CONSTRUCTION MANAGEMENT PLAN**

### **12.1 Management Responsibilities Defined**

The following list identifies responsibility for insuring the specified key safety management functions are fulfilled. Management during construction is the responsibility of each member of the project construction team. Identification of potential risks aspects and impacts is an ongoing activity. Potential impacts will be identified at both the design and construction phase via the risk assessment and safe work practices procedures. The following roles are defined in more detail in section 2 of this IMP.

- Project Manager
- Contracts Administrator
- QHSE Manager
- On Site Construction Manager
- Site Foreman

### **12.2 Allocation of Resources**

A cost centre shall be set up for each project for construction within Bradfield Corporation. Expenditure on construction issues will be monitored through the cost centre and a review conducted on a project-by-project basis. Technical resources such as personal, equipment, monitoring equipment, inspection, and the retention of specialist consultants will compromise expenditure from the cost centre.

### **12.3 Subcontracting and Purchasing**

Successful management relies largely on the control of Subcontractors on the site. Bradfield Corporation also recognises that Subcontractor Management is clearly the responsibility of the Project Team and in particular the Foreman responsible for each trade package. Subcontractors and suppliers of services, materials, plant and equipment will conform to the requirements of Bradfield Corporation Management System, relevant legislation, Australian Standards, Industry Codes of Practice and manufacturer's recommendations. Subcontractors and suppliers will be notified of Bradfield Corporation requirements. Subcontractors who carry out high to medium risk work shall comply with Bradfield Corporation Conditions of Contract. Subcontractors who will carry out low risk works shall submit documentation to be determined by Bradfield Corporation.

### **12.4 Process Control**

Bradfield Corporation will identify and plan those activities to be undertaken by employees, subcontractors, or suppliers that have some potential to be hazardous, i.e. high to medium risk. A comprehensive project specific Bradfield Corporation Site Plan will be developed by the project team through consultation. Safe work methods, work instructions, or technical procedures will be developed for all high to medium risk work to ensure that required safety planning is undertaken.

Attached at the rear is a CMP-001 Construction Management Plan (STAGE: Early Works) showing the following where applicable:

- Site delivery and unloading points
- Site access route where applicable.
- Planned location of major plant such as tower crane, mobile crane, concrete pumps, man or materials hoist.

- Areas where hazards from overhead plant or plant movements may be present.
- Parking areas if applicable
- Site office location
- First aid shed location.
- Emergency evacuation assembly points.
- Traffic and plant movement
- Personnel movement

This plan shall be amended as site conditions change and shall be posted at suitable locations on site.

Hazards associated with each major activity or trade are to be identified and responded to as follows. Where hazards are associated with site conditions or layout, procedures or rules should be established to control the hazard.

For example:

Falls from deck of multi storey construction.	Scaffold perimeter
	Regular scaffold inspections

Where Hazards are associated with an activity Bradfield Corporation will be performing with direct labour, control measures should be identified or a safe work method statement developed.

For example:

Erection of scaffold	Scaffold supervisor to prepare work method statement and scaffold design prior erection.
Erection of safety handrails to perimeter of slab	Develop safe system of work, use of safety lines and harness.

## 12.5 Inspection and Testing

Bradfield Corporation will inspect, test and monitor the work environment at all projects. Bradfield Corporation quality plans will be used throughout the construction of the project e.g. Checklist such as Inspection Test Plans (ITP's). ITP management is discussed in more detail within *section 6.7.3*.

## 12.6 Handling, Storage, Packaging & Delivery

Bradfield Corporation shall ensure that handling, storage, packaging, and delivery of plant and materials are carried out in accordance with legislative requirements and accepted practices.

Transportation of plant, equipment and materials is to be done according to procedure. Procedures also include:

- Handling heavy equipment to prevent strain injuries.
- Prevention of label removal or damage on material, plant and equipment.
- Identification, use and storage of material, plant and equipment.

Bradfield Corporation will use licensed operators for materials handling for the following activities:

- Rigging and dogging

- Crane operation
- Load operation
- Others as required.

Details of site specific requirements will be available through the Traffic Management Plan (TMP) attached to this document. Any changes in these requirements will be adjusted within this document and redistributed, in part, to all necessary stakeholders. Where necessary, this information will also be communicated through Trade co-ordination meetings and Toolbox talks.

### **12.7 Training**

Bradfield Corporation will identify the WHSE&R training needs of all employees based on their current and planned work position within the company.

The QHSE Manager will undertake a Training Needs Analysis within the company to determine the WHSE&R training requirements of all employees. Project personnel on a needs basis will determine additional project specific WHSE&R training.

### **12.8 Design**

Bradfield Corporation will undertake consideration of QHSE and Fit-For-Purpose issues in the design of a project wherever the company retains control or influence over design in the contract for works. When the contract does not include design, a review of design documentation in relation to the identification of hazards in the construction process will be undertaken.

OHS&R and Fit-For-Purpose consideration will extend to design elements of the construction, occupation, maintenance of a structure and Bradfield Corporation will wherever practicable seek to eliminate or minimize hazards identified in this process. This will be according to any acts, regulations, and or codes, including the building code of Australia.

If Bradfield Corporation scope does not include design, the following will occur:

- A review of the project documentation from an QHSE perspective; and
- Methods for resolution of issues raised in the above review.

Where necessary, Bradfield Corporation company QHSE policies in relation to contracts design consultants design will be specified.

## **13 PUBLIC SAFETY, AMENITY AND SITE SECURITY**

### **13.1 Site Offices**

Bradfield Corporation is to establish a site office on or close to the site entrance once the structure allows it. During early works, this will be located at 135 Badgerys Creek, Bradfield. A mobile Site Office will be used on the site. All WHS documentation, first aid etc. will be provided by the On Site Construction Manager from the mobile site office at all times while site is open.

### **13.2 Amenities, Water and Power**

After reviewing the Work Health and Safety Act 2011 No 10, Code of Practice – Construction Work; as well as the Code of Practice – Managing the Work Environment and Facilities, Bradfield Corporation believes 135 Badgerys Creed Rd, Bradfield site is of Class 2 Mixed Use Development

In accordance with the requirements for this site type, there is a need for change rooms and shower facilities following site establishment. A seating area for meals, portable toilet and drinking water will be provided for during site establishment. Toilets will be provided in line with current codes of Practice.

All amenities locations will be communicated through *Trade Co-ordination Meetings, Pre-Start Talks* and *Toolbox Talks* upon any changes.

Temporary power is proposed to be installed for the duration of the project from existing services running through the site. This is to be confirmed on site once the site has been made secure. Should temporary power not be made available a generator will be brought to site and utilised as required. Temporary power will be made available at each level, no more than every 25 metres horizontally; this will be installed following practical completion of each floor.

### **13.3 Site Access Strategy**

In accordance with the SSDA-stage Traffic Impact Assessment Report, the construction vehicle movements will be directed via Innovation South and Centre Loop West. Final access arrangements for each development stage will be confirmed by the appointed contractor. Due to Aerotropolis DCP restrictions on Badgerys Creek Road, it is anticipated that vehicle access across all three stages will be limited to Centre Loop West and/or Innovation South. These connections are currently under construction as part of the Bradfield City Centre works. This access strategy will be further refined during detailed design and coordinated with Liverpool City Council and other affected contractors.

Heavy vehicle operations will be restricted to designated routes and, wherever possible, confined to the arterial road network. Indicative approach and departure routes are illustrated in Figure 2 in accordance with the SSDA Traffic Impact Assessment Report. While delivery timing for the Aerotropolis road network is yet to be confirmed, it is understood that Badgerys Creek Road will include a central median, restricting movements at Innovation South to left turns only.

During excavation, all vehicular traffic will be drive in and drive out access with the inclusion of a wash down tyre area or cattle grate to control environmental debris. It is a priority of the project that normal pedestrian thoroughfares be maintained as practically as possible. Where pedestrian access is blocked, alternative routes will be established.

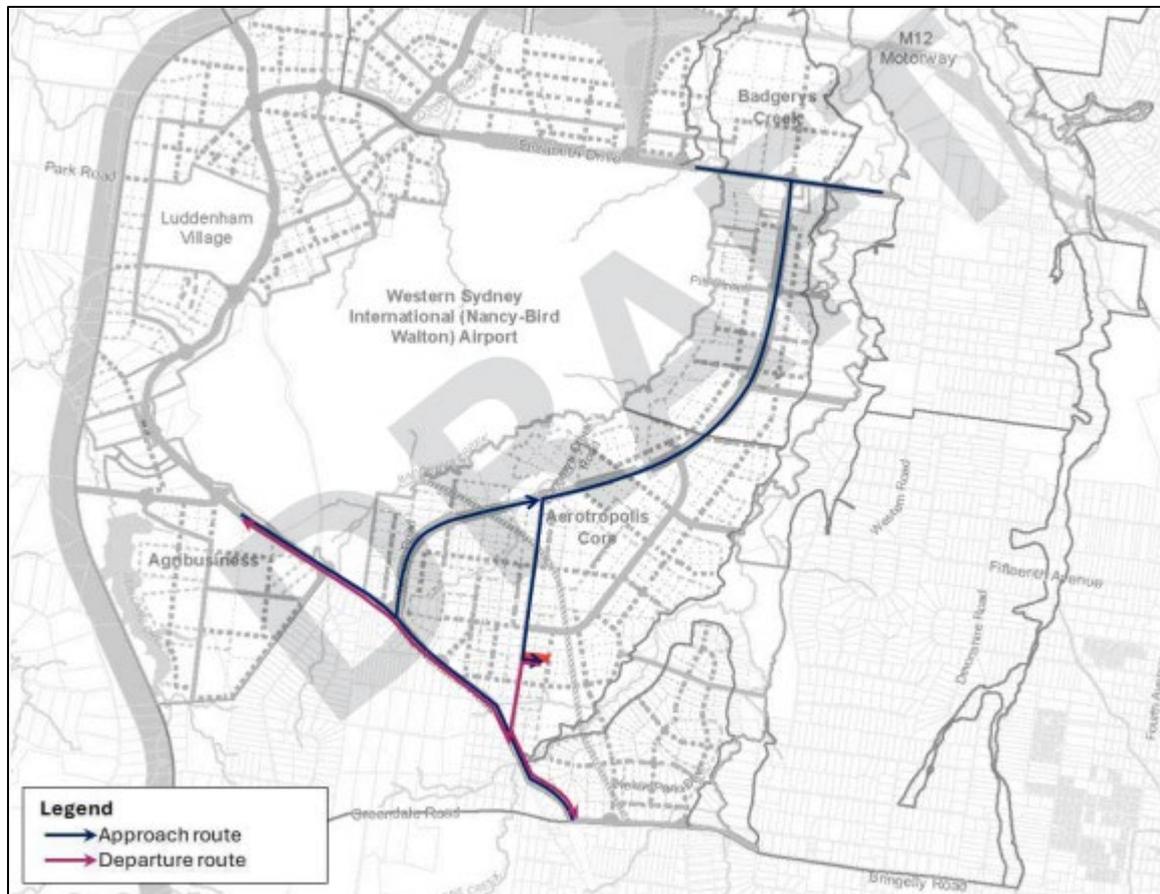


Figure 2: Anticipated heavy vehicle approach routes (Figure 10, Aerotropolis Precinct Plan)

Changes may occur to these plans as the project progresses, any changes in these procedures will be communicated effectively through email, Procore Instructions, site signage, Pre-Start Talks and Toolbox Meetings.

A detailed site specific *Traffic Management Plan* will be developed to address access to the site and minimise impact to the public during construction.

### Security Strategy

Site security will be managed by physical means of separation and monitoring. Site personnel and visitors will gain access to the site via the established site access point. Bradfield Corporation will take measures to ensure no unauthorised access is gained during the works or out of hours. The Manager will ensure site security is established and maintained as necessary to prevent unauthorised access to the site during the works. Materials are to be delivered and installed/used on the same day as much as practically possible, to prevent theft, use as weapons by passers-by and stormwater contamination.

Sub-contractors are responsible for the security of all their plant and materials and are advised to remove from site daily if necessary. A location for a toolbox can be discussed with the On Site Construction Manager if it the sub-contractor sees it as necessary. Asset tracking is to be maintained by the sub-contractor and locks for the toolbox are also to be provided by the subcontractor.

Site security needs will be reviewed at each weekly Site Meeting and any changes in requirements will be communicated to personnel and sub-contractors as necessary via emails, *Trade Co-ordination Meetings, Toolbox Talks* and *Pre-Start Talks*.

### **Public Safety**

Safety of the public will be treated with the utmost priority. All activities that involve noise, dust, security, loading and unloading materials and the potential for falling objects will be addressed during daily Pre-Start Talks and Toolbox Talks to protect the public. All workers will be trained by their employers, read and understand and sign the Safe Work Method Statement (SWMS) which refers to the activity which will put the public at risk.

Throughout the project, where there are changes to the conditions relating to public safety, Traffic Management Plans will be reviewed and workers informed timely via *Daily Pre-Start Talks*.

### **Site Storage**

Due to the nature of the project the majority of items will be stored on site. Any materials requiring overnight storage will be located well within the site boundary and where possible locked up. It is the subcontractors responsibility at the end of each day to secure all material to prevent theft, hazards to other workers or public, damage to materials and securing them so they cannot be lifted by a gust of wind.

During site establishment, Bradfield Corporation will have a storage container for all small plant and equipment which will be secured by a padlock. This key will only be in the possession of Bradfield Corporation personnel. In the later stages of construction the site storage will be moved internally.

## 14 ENVIRONMENTAL MANAGEMENT PLAN (EMP)

Any changes to this EMP will be adapted within this document as a revision. This will then be released to all affected stakeholders and where necessary communicated via meetings such as Trade co-ordination meetings, Toolbox talks and Site meetings.

### 14.1 Noise Management

Element	Noise Management
<b>Objective</b>	To provide adequate acoustic conditions during construction.
<b>Target</b>	To reduce the likelihood of the following risk: <ul style="list-style-type: none"> <li>Noise generated during construction activities that affects the overall park environment, its users and surrounding buildings.</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>Inform park users and surrounding residents/neighbouring buildings of intended scope of works, noise expectations and expected impact on the area.</li> <li>All equipment to be used during construction must be in good mechanical order and fitted with appropriate noise control equipment.</li> <li>Construction works shall comply with the relevant legislation and best practice guidelines.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>Noise levels will be monitored regularly and complaints investigated.</li> <li>Equipment will be checked regularly.</li> </ul>
<b>Approvals/Licenses/Permits</b>	Obtain from the relevant authorities.
<b>Reporting</b>	Observations shall be recorded in the Contractor's Environmental Site Inspection Report.
<b>Corrective Action</b>	Should an inspection of the construction site find any aspects that fail to comply with this EMP, corrective action to resolve this issue will be undertaken. Details of actions taken shall be recorded in the Contractor's Non-Conformance Report.
<b>Responsibility</b>	Contractor
<b>Duration</b>	Construction Phase

#### 14.1.1 Scope

To establish the noise management procedure to be implemented during construction of 135 Badgerys Creek Rd, Bradfield.

#### 14.1.2 Major Measures

A preliminary Noise and Vibration Impact Assessment for the SSDA stage has been completed. A full Construction Noise and Vibration Management Plan will be prepared during the CC stage to ensure compliance with relevant NSW Environment Protection Authority (EPA) guidelines and other applicable standards, including:

- NSW Environment Protection Authority's 'Noise Policy for Industry' (2017).
- 'NSW Road Noise Policy' prepared by the Department of Environment, Climate Change and Water NSW (DECCW NSW) dated March 2011.
- 'Interim Construction Noise Guideline' published by the Department of Environment and Climate Change NSW (DECC 2009/265) dated July 2009.
- 'Assessing Vibration: A Technical Guideline' published by the Department of Environment and Conservation (NSW EPA), February 2006.
- German Standard DIN4150-Part 3: "Structural vibration in buildings – Effects on structures".

- Construction Noise Strategy (Transport for NSW, 2012)

**14.1.3 Working Hours:**

As per SSDA conditions

**14.1.4 Standard**

- The maximum noise levels of all construction plant and equipment is to comply with EPA requirements, measured at the site boundaries
- Noise levels are to comply with Liverpool City Council regulations at the site boundaries

**14.1.5 Management Maintenance:**

- The maintenance of exhaust silencing attachments on all diesel powered equipment;
- Only silenced compressors and silence bagged jack hammers will be permitted to be used on the site;
- Potential for noise generation to be used as an important criteria in the selection of construction plant and equipment on the site;
- On site periodic checks are to be carried out to ensure that noise suppression devices are installed on all required plant and equipment;
- Where practicable, noise-generating plant is to be located away from residential boundaries.

**14.2 Air and Dust Management**

Airborne dust from construction sites has the potential to cause; health/respiratory problems, environmental degradation, air and water pollution, visibility problems, damage/dirty property and belongings, unsafe working conditions and increase costs from loss of materials. A major cause of dust is exposed/uncovered soil from construction activities which is then acted upon by wind. Dust will be controlled as necessary to ensure the public and surrounding neighbours are exposed to the least possible impact during all phases of work.

Element	Air Quality Management
<b>Objective</b>	To minimise the negative impact of construction on air quality.
<b>Target</b>	To reduce the likelihood of the following risks: <ul style="list-style-type: none"> <li>• Dust and other air-borne particles generated from construction activities affect the surrounding areas.</li> <li>• Dust and other air-borne particles generated on the construction site affect overall site operations.</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Ensure that all vehicles and equipment are regularly maintained in order to minimise exhaust emissions and comply with regulations.</li> <li>• No burning of rubbish or other materials on site.</li> <li>• Dust should not be visible outside the boundaries of the site.</li> <li>• All areas cleared but not involved in construction and temporary stockpiles shall be revegetated as soon as possible.</li> <li>• During high wind conditions construction activities that have the potential to generate excessive amounts of dust shall be halted.</li> <li>• Dust control fencing shall be erected on the construction site perimeter fencing adjacent areas of base operations, prior to the commencement of any dust generating activities.</li> <li>• Regular clean ups on site to prevent excessive build-up of dust and dirt.</li> </ul>
<b>Monitoring</b>	Visual analysis of on-site dust levels shall be undertaken and recorded during high winds.
<b>Approvals/Licenses/Permits</b>	Must comply with OH&S standards for dust as stated by SafeWork
<b>Reporting</b>	Observations shall be recorded in the Contractor’s Environmental Site Inspection

	Report.
<b>Corrective Action</b>	Should an inspection of the construction site find any aspects that fail to comply with this EMP, corrective action to resolve this issue will be undertaken. Details of actions taken shall be recorded in the Contractor's Non-Conformance Report.
<b>Responsibility</b>	Contractor
<b>Duration</b>	Construction Phase

#### 14.2.1 Air Quality Management Methodology

To ensure that construction activities do not lead to the generation of unacceptably high levels of dust or other air pollution.

#### 14.2.2 Scope

To establish the air quality management procedures to be implemented during the bulk earthworks and construction of the development.

#### 14.2.3 Major Measures

- All construction plant, equipment and vehicles are to be properly maintained and operated so as to mitigate excessive exhaust emissions;
- Waste and spoil loads leaving the site are to be covered at all times;
- All dust generating construction activities are to cease during high wind conditions unless such operations can be controlled by localised watering or other control means;
- Continual visual monitoring of the site will be undertaken by site management to ensure that works do not generate unacceptably high levels of dust;
- Wherever practical, materials and processes that are non-toxic will be employed to minimise possible harmful effects to air quality;

#### 14.2.4 Standards

- All work to be in accordance with WHSE Requirements and SafeWork guide lines

### 14.3 Wildlife Management

Wildlife has the potential to be attracted to construction and operational areas through the presence of water, food waste, vegetation, and shelter. Increased wildlife presence can pose safety risks to aircraft operating from Western Sydney International Airport, located within 3 km of the site. Effective management is required to ensure the development does not increase the risk of wildlife strikes and complies with the Western Sydney Aerotropolis DCP, NASF Guideline C, and other relevant legislation.

Element	Wildlife Hazard Management
<b>Objective</b>	To minimise the potential for wildlife attraction during construction and operation, ensuring the development does not increase wildlife strike risk to Western Sydney International Airport.
<b>Target</b>	To reduce the likelihood of the following risks: <ul style="list-style-type: none"> <li>• Wildlife attracted to site features such as waterbodies, waste, or landscaping.</li> <li>• Construction or operational activities contributing to increased wildlife presence.</li> <li>• Non-compliance with aviation safeguarding and environmental legislation.</li> </ul>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Engage a qualified Project Arborist/Ecologist to oversee implementation of wildlife hazard mitigation measures.</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure no food waste is left exposed; use sealed, wildlife-proof bins and conduct regular waste collection.</li> <li>• Prohibit public feeding of wildlife; display signage advising of safety risks.</li> <li>• The landscape design package already excludes plant species known to attract flying-foxes and large birds (e.g., Eucalyptus spp., Acacia spp., Banksia spp.) during public domain works and tree planting, ensuring compliance with the approved Landscape Species List and Aerotropolis species list.</li> <li>• Implement irrigation controls to prevent ponding or standing water on site.</li> <li>• During construction, prevent accumulation of water in excavations and cover exposed water surfaces where feasible.</li> <li>• During operational phase, ensure that Gung Gung Pond maintains a consistent 3H:1V slope and that riparian zones are stabilised and maintained to discourage bird roosting (e.g., steepened or armoured banks, limited shallow edges, controlled planting).</li> <li>• Regularly inspect the site for evidence of wildlife congregation and apply deterrents or habitat modification as necessary.</li> </ul>
<b>Monitoring</b>	<ul style="list-style-type: none"> <li>• Undertake visual inspections at least weekly and during/after rainfall to check for water ponding, food waste, or bird congregation.</li> <li>• Record and report any wildlife activity of concern to the Principal Certifying Authority (PCA) and Airport Safeguarding team.</li> <li>• Undertake post-construction review to confirm effectiveness of mitigation measures.</li> </ul>
<b>Approvals / Licences / Permits</b>	Must comply with: <ul style="list-style-type: none"> <li>• SEPP (Western Parkland City) 2021 and Western Sydney Aerotropolis DCP (Phase 2).</li> <li>• National Airports Safeguarding Framework Guideline C (Managing Risk of Wildlife Strikes in Vicinity of Airports).</li> <li>• Biodiversity Conservation Act 2016 and EPBC Act 1999 where applicable.</li> </ul>
<b>Reporting</b>	Wildlife observations and mitigation actions shall be recorded in the Contractor’s Environmental Site Inspection Report. Any non-compliance or wildlife hazards identified shall be logged and reported to the PCA and relevant authorities.
<b>Corrective Action</b>	Should wildlife attraction or non-compliance be observed, immediate corrective action shall be undertaken. Measures may include waste management review, vegetation removal or modification, water control, or liaison with airport wildlife authorities. Details of actions taken shall be recorded in the Non-Conformance Report.
<b>Responsibility</b>	Contractor / Site Manager / Project Arborist / Building Manager
<b>Duration</b>	Construction and Operational Phases.

#### 14.4 Erosion, Water and Sediment Management Plan

It is very important to prevent soil and sediment loss from the 135 Badgerys Creek Rd, Bradfield as per the sediment control plan. As such, the following actions will be undertaken;

This Soil and Water Management Plan will be designed by the stormwater consultant and implemented during the construction of the project. The purpose of these procedures is to ensure that there is no off site environmental impact caused by overland stormwater flows.

##### 14.4.1 Scope

The work to be executed under this plan consists of the design and construction of earthwork, and, residential apartment construction. This incorporates the implementation of measures to control erosion and sedimentation on the site. Works will be undertaken so as to avoid erosion and disposal of sedimentation off the site, surrounding land, draining watercourses and water bodies.

#### 14.4.2 References

- Liverpool City Council.
- Planning NSW Regulations
- Environmental Protection Legislation
- Clean Waters Act 1970
- Department of primary industries (office of Water)

#### 14.4.3 General Principles

Once excavation is achieved, run off water which carries the sediment will be contained within the site boundaries, in such a way as to reduce the amount of sediment leaving the site.

Generally, this may be achieved by the following:

- Limiting the amount of site disturbance where practical.
- Installation of sediment controls and water treatment within the site to control any water on site;

Element	Sediment, Erosion & Water Management
<b>Objective</b>	To control the quality of surface water leaving the construction site, minimise erosion, and prevent adverse impacts to downstream waterways, flood behaviour, and riparian corridors.
<b>Target</b>	<p>To reduce the likelihood of Sediment laden site runoff leaving the construction site without passing through control structures and/or exceeding any statutory requirements.</p> <p>Ensure compliance with statutory requirements, including NSW Water Management Act 2000 and SEPP (Precincts – Western Parkland City) water quality targets.</p> <p>Maintain natural overland flow paths and avoid increasing flood risk to surrounding properties.</p>
<b>Actions</b>	<ul style="list-style-type: none"> <li>• Install erosion and sediment control prior to commencement of works in accordance with the Sediment and Erosion Control Plan developed in Detailed Design and maintain these conditions throughout all construction works.</li> <li>• All control structures shall be re-instated as part of the site closure procedures each day.</li> <li>• Protections measures to stabilize erosion shall be provided at drain outlet and pump out points.</li> <li>• Excavated topsoil shall be stockpiled on site and later reused for landscaping if possible.</li> <li>• All soils removed during excavation should be replaces in their natural soil profile to prevent erosion of subsurface layers.</li> <li>• Integrate stormwater management features (WSUD elements) with permanent landscaping to meet Wianamatta-South Creek stormwater targets.</li> </ul>
<b>Monitoring</b>	<p>An Erosion and Sedimentation Control Plan submitted and approved prior to works commencing.</p> <p>Weekly inspections and after significant rainfall events.</p> <p>Monitor turbidity and pH of any water released off-site to ensure compliance with ANZECC guidelines.</p>
<b>Approvals/Licenses/Permits</b>	<p>Controlled Activity Approval under WM Act 2000 (if required).</p> <p>Water Access Licence (WAL) if groundwater dewatering exceeds exempt volumes.</p> <p>Local council approval for sediment basin discharge when connected to</p>

	stormwater network. All other approvals applicable the relevant authorities.
<b>Reporting</b>	Observations shall be recorded in the Bradfield Corporation Site Inspection Report.
<b>Corrective Action</b>	Should an inspection of the construction site find any aspects that fail to comply with this EMP, corrective action to resolve this issue shall be undertaken. Details of this procedure shall be recorded in the Non-Conformance Report.
<b>Responsibility</b>	Bradfield Corporation
<b>Duration</b>	Construction Phase

#### 14.4.4 Hazardous Chemicals and Dangerous Goods Management

Chemicals and goods used on site may be hazardous and have the potential to cause serious health problems and damage to property. As such the following measures will be adhered to;

- Storage of hazardous chemicals or dangerous goods to be in accordance with the product MSDS, all legislative requirements and the SafeWork Guide: Managing Risks of Hazardous Chemicals in the Workplace Code of Practice 2014.
- No products or substances, including chemicals or fibrous materials, are to be brought to the workplace without a current MSDS. A current MSDS (within 5 years of the date of issue and valid for Australia) is to be provided with all products and substances to be used for a work activity.
- All personnel will be made aware of any activity involving chemical materials that will be taking place during Toolbox Talks and as necessary.
- In the case of a chemical emergency, the On Site Construction Manager will be contactable 24/7.

#### 14.4.5 Soil and Water Management Plan – Details

The project incorporates strategies for managing stormwater, protecting and revitalizing natural watercourses, assessing and mitigating flood risks, and addressing soil conditions.

Here's a breakdown of the soil and water management strategies:

##### 1. Integrated Water Management (IWM) and Water Efficiency

A Preliminary Integrated Water Management (IWM) Plan has been developed at the SSDA stage to address the Secretary's Environmental Assessment Requirements (SEARs) and demonstrate that the project can meet water quantity and quality objectives for the Bradfield City Centre precinct.

Where required, a detailed IWMP will be developed during the detailed design phase, in consultation with Liverpool City Council, Sydney Water, and other relevant drainage and water authorities.

The IWM Plan:

- Identifies necessary water-related servicing infrastructure and tie-in points to the Bradfield City Centre enabling works (Stage 2A and 2D), including the interim basins and the future Regional Stormwater Infrastructure (RSI).
- Evaluates opportunities to reduce potable water demand through provision of recycled water services, rainwater harvesting, and reuse for irrigation and non-potable uses.

- Details the proposed drainage design for stormwater and wastewater, including on-site treatment (gross pollutant traps, storm filter cartridges), reuse, on-site detention tanks sized for 1% AEP events, water quality management measures (MUSIC modelling to Wianamatta–South Creek targets), and nominated discharge points.
- Confirms compliance with Liverpool City Council, Sydney Water, and WPCA requirements, avoiding adverse downstream impacts and ensuring connection readiness for both interim and ultimate discharge scenarios.
- Incorporates ecologically sustainable design principles, including water-efficient WELS-rated fixtures, green infrastructure (rain gardens, bioretention swales, green roofs), and reduced overall water consumption.

## 2. Stormwater Management

- Civil & Stormwater consultants have been engaged, and their recommendations are integrated into the design.
- The project prioritizes Water Sensitive Urban Design (WSUD) strategies, including the use of swales, rain gardens, and bioretention systems to filter water before it enters the creek.
- Permeable surfaces will be incorporated to help absorb runoff, reducing erosion and flooding.
- The riparian buffer zones are designed to act as additional filters, protecting water quality.
- A site-specific Stormwater Management Strategy and concept plan with supporting reports and calculations are required.
- On-site detention (OSD) basins will be provided to limit post-development flow to pre-development levels.
- A water quality treatment device is mandated, and a MUSIC model will be submitted for analysis, demonstrating compliance with the "Technical Guidance for Achieving Wianamatta–South Creek Stormwater Management Targets (DPE, 2022)".
- Interim stormwater quality measures will be implemented and maintained until Sydney Water establishes the regional basin network. Civil plans will clearly distinguish between interim and ultimate stormwater management arrangements.
- The development will ultimately connect to Sydney Water's Regional Integrated Stormwater Scheme, which includes natural creek lines, naturalized trunk drainage channels, consolidated treatment, and stormwater harvesting basins.
- Road drainage design, particularly from future roads like Innovation South, will be carefully managed to prevent pollutants from entering the existing pond.

## 3. Soil Management and Contamination

- Geotechnical assessments have been conducted to evaluate potential impacts on soil resources, salinity, and acid sulfate soils.
- An Acid Sulfate Soils (ASS) Assessment has been completed. The management of acid sulfate soils will be carried out in accordance with the Acid Sulfate Soil Management Plan, and the contingency measures outlined in the plan will be implemented as shown in the figure 3 below.
- A Construction Environmental Management Plan (CEMP) will be further developed to ensure stormwater and wastewater are contained on-site, preventing impact on adjoining land.
- Regarding land contamination, a Stage 1 Preliminary Site Investigation has been completed, and it has been determined that no further studies are required at this stage.
- The Protection of the Environment Operations Act 1997 and Contaminated Land Management Act 1997 are relevant statutory instruments.
- The NSW Environment Protection Authority (EPA) has stated that the proposal does not constitute a "Scheduled Activity" and thus, an Environment Protection Licence from them is

not required at this stage. They recommend consultation with Liverpool City Council, who will be the appropriate regulatory authority.

Condition	Action
Potential ASS identified at unexpected depths	Stop excavation. Have material assessed by an environmental consultant for the presence of ASS. Follow management procedures adopted in the ASSMP.
Neutralisation of ASS was not effective	Re-assess liming rates and add additional lime to material. Re-test material to check neutralisation.
Neutralisation of ASS indicates that too much lime has been added and soils are alkaline	Remediate soils before use. Remediation comprises mixing additional ASS with the material (i.e. use excess lime to neutralise more ASS). Re-test material to check neutralisation.
Bunded ASS treatment area is damaged	Repair bund as soon as practicable. Clean-up any ASS that escaped the treatment area and place back into the treatment area. Check surrounding area for impact from the ASS or leachate, and undertake remedial action as required.
Groundwater level falls below the upper limit of soil horizon identified as containing PASS	Pause / adjust the rate of dewatering to restore groundwater level to above soil horizon defined as containing PASS. Review PASS exposure by checking the ASS and non-ASS interface in the affected area. Determine potential causes by reviewing construction practises, weather, baseline groundwater monitoring data, and performing additional groundwater monitoring as necessary on groundwater monitoring present at the site. Review and confirm mitigation measures to be implemented, including: Maintaining PASS soil moisture levels through targeted groundwater recharge; Adjusting the construction activities or schedule; and Treatment of additional PASS in treatment area. The pH of water should be monitored.
Extended rainfall generating excessive water	The control procedures detailed in the plan will accommodate this contingency. The timeframe needed to recover the excessive water may extend the period during which the trench or excavation is open increasing the potential for acid generation and therefore requiring management.
Extended delays due to equipment failure, leaving excavated materials open to oxidation	Addition of lime sufficient to neutralise the total potential acidity of the excavated waste. A safety factor of 1.5 is included in the calculation of lime required which should ensure sufficient neutralising capacity should the excavation be open for greater than the planned period. The oxidation of the walls and base of the excavation should also be considered in regards to engineering design.
Spillage of ASS	Spillage of ASS should be collected and transferred to the acid soil storage facility as soon as practicable to ensure that surface soil or groundwater is not adversely impacted.

Figure 3: Contingency Plan for ASS (ei Australia ASSMP)

#### 4. Flooding and Riparian Corridor Protection

- A Flood Risk Assessment is required as part of the SEARS to identify any flood risk on-site, considering adopted flood studies, climate change, and the NSW Floodplain Development Manual.
- The site is impacted by overland flooding with two flowpaths, and existing flood studies (like the Bradfield City Centre Master Plan Flood Impact Assessment) must be used to outline flood behaviour and assess impacts.
- The project must comply with Western Sydney Aerotropolis Development Control Plan Phase 2 Section 2.5.1 Flood Management.
- The project adopts a "Country-centred, landscape-led design approach," prioritizing the site's natural features and existing riparian corridor.
- The site contains a dormant water body/pond and natural watercourses (Gung Gung Creek). The design includes realigning a proposed north-south road to follow the terrain and flow of the on-site creek and pond, thereby maintaining the integrity and facilitating the revitalization of the riparian corridor.
- All proposed building Finished Floor Levels (FFL) are significantly above the floodwaters impacting the site (>500mm above the 1% AEP flood level) and the proposed development is therefore flood-free in the 1% AEP event.
- The riparian corridor is considered integral to maintaining ecological health and stormwater management. A realigned creek channel with a proposed offset area will ensure the creek remains in a natural state.
- Biodiversity is prioritized by revitalizing the riparian zone with native vegetation, which provides habitat, stabilizes soil, and filters runoff.
- The site's inclusion in the Blue-Green Grid concept further emphasizes its role in enhancing biodiversity, mitigating urban heat, and improving stormwater management.
- Liverpool City Council previously expressed concerns about an earlier design proposal (SDRP1 scheme) that would have involved undergrounding the creek and removing the pond, which was not supported. The revised design (SDRP2) explicitly addresses these concerns by preserving and revitalizing the riparian setting and increasing deep soil and tree canopy.

#### 5. Deep Soil and Vegetation

- The project has deep soil provision, achieving 2,973.01 m<sup>2</sup> (14.69% of the site area) and Tree Canopy Coverage of 4,340.19 m<sup>2</sup>(21% of the Site Area)
- This increased deep soil and tree canopy supports the existing riparian setting and contributes to an active public domain.
- Significant vegetation in the riparian corridor of the site is revitalised as part of the communal open space and deep soil strategy.
- The landscape design will involve a native plant palette for sponge areas, rain gardens, and bush food, selected from endemic species compatible with the local regions and cultural native planting lists.

#### **14.4.6 Details of Erosion & Sediment Controls**

The following general items will be incorporated into the construction management on the site:

1. Sediment Control Plan has been prepared for SSDA stage
2. Sediment pits/dams are to be constructed throughout the site as the projects progression requires. All stormwater that falls over the site will be directed into the appropriate soakage pits.
3. All transports leaving the site will be checked to ensure all loads are covered and secure to prevent the possibility of material spilling onto the road and into the stormwater system. All trucks are to be covered prior to leaving the site (where applicable). All roads and pedestrian footways surrounding the site will be swept to remove any debris associated with the works on the site.
4. Wash down of concrete trucks will not be permitted where such wash down could enter local waterways.
5. Appropriate wash down bays will be installed on the site for the cleaning of trucks. Wash down bays and High-pressure cleaners will also be available for the cleaning of trucks and other vehicles using subterranean site water where the shaker grid proves ineffective.
6. Install silt fencing to perimeter site fencing (where required):
  - Silt fences are designed to filter run-off (if any) leaving the site, trapping sediment and allowing filtered water to pass.
  - The proposed location of silt fencing can be found on the attached plans where required/ if any.
7. Wind and dust control measures will be controlled to acceptable levels by use of the following
  - Frequent watering of the disturbed areas of the site (where required) to provide a damp surface. Note this work is to be maintained during weekend and Public Holidays as required

#### **14.4.7 Sequence & Management of Erosion & Sediment Control Installation**

1. Install silt fences as installation of perimeter site fencing occurs  
(As shown in plans Sediment Control Plan)
2. Ongoing maintenance of erosion control devices as excavation continues and structures commence.
3. Reappraisal of devices during construction.
4. Maintenance of all drainage and sediment control measures as required.

## 15 CONSTRUCTION WASTE MANAGEMENT PLAN

### 15.1 Scope

To address the waste management procedures for the construction activities, undertaken during the proposed construction of the project. This plan will be updated after design completion to identify, quantify, and classify the likely waste streams generated during construction.

### 15.2 Purpose

To ensure that resources are conserved and waste is processed responsibly by minimising waste generation and maximising recycling of materials.

Bradfield Corporation aims to reduce its negative environmental impact wherever possible. We will:

- Maximise reuse and recycling of any building construction material waste
- Avoid waste through design and accurate material quantity ordering
- Minimise non-recyclable waste sent to landfill

The following measures will be taken on the 135 Badgerys Creek, Bradfield site to promote efficient and effective waste management best practice:

- Access: waste systems will be located at Innovation South so collection vehicles are able to access buildings to remove waste safely and easily, as well as being convenient for site staff
- Safety: safe practices will be applied for storage, handling and collection of waste and recycling
- Pollution prevention: practice good storage of waste to help stop stormwater pollution
- Waste storage areas and equipment are to be cleaned regularly

The project will aim to recycle and/or reuse at least 80% of construction waste.

#### Ongoing waste management on site

To be installed during construction;

- One secure sharps container each amenities block
- One sanitary bin container per female only cubicle

Sharps, feminine hygiene products and waste generated by the baby change facility are to be managed by contractors appointed by Liverpool City Council.

#### Asbestos Note

Asbestos is not anticipated on the 135 Badgerys Creed Road, Bradfield, however should asbestos be encountered it will be treated in accordance with the "How to Safely Remove Asbestos" Code of Practice. Depending on the quantity found on site, the waste management contracting centre will provide either

- A 2m<sup>3</sup>, 4m<sup>3</sup> or 6m<sup>3</sup> Skip bin (which will be Lined with concrete plastic before any asbestos is placed in the bin and then covered and sealed with concrete plastic before removal from site), or
- An Asbestos bag (thick concrete plastics: 600mm x 900mm)

## 15.3 Major Measures

### 15.3.1 Materials Selection & Ordering:

- Selection of all materials will be undertaken by architectural designers;
- Materials requirements are to be accurately calculated to minimise waste from over ordering;
- Materials ordering process is to aim at minimisation of materials packaging;
- Material Safety Data Sheets are to accompany all materials delivered to site, where required, to ensure that safe handling and storage procedures are implemented.

### 15.3.2 Waste Recycling:

- Waste generation from construction activities on the site will be minimised, reused or recycled where applicable;
- Dedicated and secure containers will be provided on site by an approved waste handling company for non-recyclable waste;
- Waste that can be re-cycled will be separated into specific bins. This will typically include:

Concrete	Plasterboard.
Bricks	PVC
Timber	Tiles
Steel	

- Mixed waste will be transported off site to a re-cycling depot where it will be further sorted for re-use and / or re-cycling.
- The waste contractor will assist regular waste performance by reporting to the builder.

## 15.4 Waste Management Principles

### 15.4.1 Educational / Training /Awareness

#### a) Awareness and knowledge of the Construction Waste Management Plan (CWMP)

- Avoid - reuse - recycle - dispose  
Bradfield Corporation is aiming to reduce the amount of waste to land fill by adopting the waste management hierarchy of *avoid > reuse > recycle > dispose* in the excavation and construction processes. The following document outlines waste management procedures to be carried out to assist in reducing waste.

The first step to ensure that all people involved are aware of the CWMP and understand the importance. It is therefore necessary for architects, interior designers, On Site Construction Managers, foreman, leading hands and labours working for Bradfield Corporation are prepared to assist in managing waste minimisation

- Induction's  
To achieve the awareness of the CWMP to all persons on site including Bradfield Corporation employees and subcontractors, the CWMP procedures will be incorporated into the site specific induction, which all workers on the site must undertake prior to their commencement on site. Bradfield Corporation employees will undertake a specific induction outlining their duties in enforcing CWMP procedures are complied with by subcontractors.

- **Colour coding**

Recycling bins will be colour coded or sign posted assist in the identification of bins. Not all bins will be colour coded. Skips will not be colour coded only the smaller wheelie bins will be colour coded.

- b) Signage**

All bins will have signage fixed stating what type of materials is to be placed in the bin: E.g. steel, concrete, bricks, general rubbish, etc. Signage will be erected for dumping procedures at rubbish chutes, areas that bins are to be stored, any stockpiling areas (if applicable), waste collection procedures and the responsibilities of persons on site in regards to CWMP.

- c) Procedures of CWMP**

The following approach will be adopted to waste management planning;

1. Issue this CWMP to Architects, Interior Designers & Site management to establish the awareness by all parties for construction waste and ongoing waste management of the building.
2. Create an induction to be incorporated in the site specific induction.
3. Include condition in Sub-contracts for compliance with this CWMP
4. Engage a suitable waste removal contractor
5. Obtain Work Method Statements (WMS) from sub-contractors which are to include compliance with CWMP
6. Bradfield Corporation to supply adequate bins and removal methods
7. Bradfield Corporation site team to monitor and ensure compliance with WMP by sub-contractors
8. Monitor feedback reports from waste removal contractor
9. Upon completion remove all bins and temporary signage from site.

- d) Incentives / repercussions**

Incentives to be provided to Bradfield Corporation employees and sub-contractors to achieve best practices in waste management. The following to be implemented;

1. Provide site barbecues if waste targets are achieved.
2. If contractors are caught mixing waste and not separating for recycling – labour will be employed to separate the waste and back-charged to the sub-contractor
3. If employees refuse to Co-operate with the CWMP they will be removed from the site

## 15.5 Details of Waste Management

### Details of project

Site Address: **135 Badgerys Rd, Bradfield**

Existing buildings: Nil

### New Building

**Building A: 12 levels** above ground (from Ground Level to Level 11).

**Building B: 11 levels** above ground (from Ground Level to Level 10).

**Building C: 12 levels** above ground (from Ground Level to Level 11)

Start Date: September 2026, subject to Authority Approvals

Construction Duration 24 Months each stage

Transport Company: TBC

## 15.6 General overview

Recycling procedures for the construction of the building to be undertaken by both the builder and the waste contractor. Site will as far as possible and outlined below, separate recycling materials on site.

Focus on waste management will therefore be greatly directed at the source in avoiding waste and at waste recycling by both the builder and the waste contractor. The waste contractor will also sort any general waste bins taken off the site to further enhance waste recycling processes.

## EXCAVATION WASTE MANAGEMENT PHASE

All excavated material generated on this site may be re-used in the landscaping or used on other sites as fill material, provided no contamination is present. If sandstone is found to be present, this may be sold or incorporated into the building design.

Type of Material	Less than 10m <sup>3</sup>	Estimated Tonnage	How Waste will be Managed			Estimated Tonnage of Material Diverted from Landfill
			Reuse On-Site	Recycle	Landfill	
Excavation Material	<input type="checkbox"/>	113226.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	112942.9
Green Waste	<input type="checkbox"/>	606.2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	484.9
<b>Total</b>		<b>113832.2</b>	<b>Total</b>			<b>113427.9</b>
<b>Total Diversion of Waste from Landfill (Minimum 80%)</b>						<b>99.6%</b>

Figure 4: Demolition Waste Management (Elephants Foot Consulting)

## CONSTRUCTION WASTE MANAGEMENT PHASE

Waste generated during the construction stage of the development will be managed by the principal contractor and sub-contractors, with materials being reused and recycled wherever possible. Where neither reuse nor recycling are possible, waste will be disposed of as general waste at a licensed landfill site.

Recyclable material generated during construction will largely consist of off-cuts and discarded bricks, timber, steel, concrete, tiles, plasterboard, and piping, as well as packaging materials.

Type of Material	Less than 10m <sup>3</sup>	Estimated Tonnage	How Waste will be Managed			Estimated Tonnage of Material Diverted from Landfill
			Reuse On-Site	Recycle	Landfill	
Bricks	<input type="checkbox"/>	28.2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	28.2
Tiles	<input type="checkbox"/>	33.6	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	33.6
Concrete	<input type="checkbox"/>	3458.3	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3458.3
Timber	<input type="checkbox"/>	43.1	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	14.2
Plasterboard	<input type="checkbox"/>	35.2	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	17.6
Metals	<input type="checkbox"/>	9606.0	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9606.0
<b>Total</b>		<b>13204.4</b>	<b>Total</b>			<b>13157.9</b>
<b>Total Diversion of Waste from Landfill (Minimum 80%)</b>						<b>99.6%</b>

Figure 5: Construction Waste Management (Elephants Foot Consulting)

## 15.7 Waste Removal Procedure

- **Demolition Phase**

NA, the site is currently Vacant and Buildings are present on Site

- **Excavation Phase**

During the Excavation phase all fill will be re used on site as previously mentioned.

- **Structure Phase**

Throughout the erection of the structure, bins (2m<sup>3</sup>) will be used for the collection of waste. 1 bin will be used for formwork and 2 bins for general waste such as tie wire, electrical, plumbing, and dirt waste. This bin when full will be emptied into larger bins (15m<sup>3</sup>) forklift or Manitou. Once the larger bins are full they will be lifted via waste removal truck located within the site.

During construction of the structure 15m<sup>3</sup> bins will be located on the lower areas of the site wherever possible. The locations of the bins may alter as the job progresses. For the majority of the time there will be adequate area allocated for a number of bins, for the purpose of recycling

- **Finishes Phase**

Small (1m<sup>3</sup>) bins on wheels will be used to move around the levels and pick up waste. These bins when full will be transported to the location of the larger bins.

The bins will be located off street at all times and in locations where they can be accessed at all times by the waste disposal contractor's trucks. Therefore there will be minimal disruption to local traffic movements.

In all cases material will be separated into the relevant recycle bins. In addition to those bins set aside for recycling, there will be general refuse bins provided on site for smaller quantities of non-recyclable material. These bins will automatically be sorted at the waste contractor's depot in order to salvage any further recyclable material overlooked on the site.

- **Treatment of waste**

As described above, where possible all materials will be separated on site into designated bins and removed from site by the waste contractor. The waste contractor may undertake further separation of general waste bins.

- **Records / Waste monitoring / Feedback**

Excavation contractor will submit records of all waste and fill removed from the site stating the type, quantity and location disposed. Waste contractor is to submit to site reports also detailing the type and quantity of waste removed in skips from site on a fortnightly basis. This information will be directed to site so that it can be monitored to ensure minimum landfill. Further measures may need to be taken by management to achieve higher recycling rates.

- The selected waste contractor will liaise with Bradfield Corporation in the compilation of a monthly report detailing the amount of waste received and the details of those products recycled.

- **Signage**

All bins will have a sign front and back stating which type of waste is to be placed in the bin whether it is general, steel, concrete, plasterboard, etc.

## 15.8 Waste management Contractor

Please be advised that at the time of preparing this report a waste management contractor had not been appointed. Upon appointment of this contractor, a waste management specification and principals will be established.

## **16 DILAPIDATION SURVEY**

### **16.1 Scope of Works**

A dilapidation survey of the surrounding roads, residential buildings (if any) hard stand, landscaping and roads is required. This will be conducted prior to any works commencing on site and report will be submitted to council. A post dilapidation will be carried out at the completion of all works.

## 17 CONSTRUCTION TRAFFIC MANAGEMENT PLAN

### 17.1 Purpose

The Traffic Management Plan illustrates how Bradfield Corporation will manage the traffic and pedestrian movement in and around 135 Badgerys Rd, Bradfield.

### 17.2 Scope

The site at 135 Badgerys Creek Road, Bradfield, is directly situated on or adjoins the following roads:

- Badgerys Creek Road: The site's address is 135 Badgerys Creek Road, Bradfield. This road forms the western boundary of the site. There is a provision for a 10m setback for future widening of Badgerys Creek Road, which is identified as a sub-arterial road. Traffic access via this frontage should be avoided.
- Innovation South Road (Road 07): This road forms the southern boundary of the site and will be established in 2026. It is also referred to as "Road 07". The development has made a 2.88m setback allowance to accommodate its profile. **All construction access for the three stages of the development will be exclusively from Innovation South Road.**
- Centre Loop West (Road 06): This road is located along the eastern boundary of the site. Vehicular access and dedicated hotel use are planned from this road, along with pedestrian crossings from the Metro.
- Proposed N-S Road / New Street: A new 17-meter-wide "City Street" is identified to the site's north to provide through-site connectivity and integration with the wider Bradfield City Centre Master Plan, effectively bisecting the site into two distinct masses. A "Proposed N-S internal road" is also mentioned for stage 2 access. The alignment of this road has been rationalised to a central location, aligning with the existing creek.

### 17.3 Pedestrian and Traffic Methodology during Construction

The following is a summary of the proposed traffic and pedestrian management throughout the construction of the project.

Appropriate hoarding and fencing will be installed around the site perimeter to ensure separation between construction activities and the public. As there is currently no pedestrian or cycling infrastructure surrounding the site, interactions with pedestrians and cyclists are expected to be minimal. In the unlikely event that such movements occur, temporary holding measures may be implemented along the site frontage during overhead works to maintain safe passage. These arrangements will be further detailed during the detailed design stage and incorporated into the Construction Traffic Management Plan (CTMP).

In accordance with the SSDA-stage Traffic Impact Assessment Report, the construction vehicle movements will be directed via Innovation South and Centre Loop West. Final access arrangements for each development stage will be confirmed by the appointed contractor. Due to Aerotropolis DCP restrictions on Badgerys Creek Road, it is anticipated that vehicle access across all three stages will be limited to Centre Loop West and/or Innovation South. These connections are currently under construction as part of the Bradfield City Centre works. This access strategy will be further refined during detailed design and coordinated with Liverpool City Council and other affected contractors.

Heavy vehicle operations will be restricted to designated routes and, wherever possible, confined to

the arterial road network. Indicative approach and departure routes in accordance with Anticipated heavy vehicle approach routes in the Aerotropolis Precinct Plan.

## **17.4 Road Traffic**

Throughout the construction phase of the works to be carried out on the site the following management procedures are to be implemented.

Heavy vehicle traffic flow to & from the site, during excavation and construction activities will where possible utilise the major arterial and sub arterial roads. Traffic control routes will be developed with all major material suppliers, and sub-contractors including excavation. These movements will be predominantly soil removal, deliveries i.e. concrete and rubbish removal.

The primary transportation consideration during construction is access to and from the site. Internal circulation is primarily a function of detailed construction

### **17.4.1 Proposed ingress and egress routes to the construction site**

All vehicles accessing the site are to enter and exit via Innovation South. Vehicles will follow the Traffic Management Plan (in progress) as a guideline for all traffic movement. All construction access for the three stages of the development will be exclusively from Innovation South Road.

### **17.4.2 Proposed designated points for construction vehicles accessing each site**

The proposed location of footpath crossovers onto the site for each stage will be noted on the construction management plan. We will be utilising existing lay backs or construct temporary lay backs where necessary.

### **17.4.3 Proposed Construction Zone Locations**

A loading zone will be applied for as part of this project, with all loading activities to occur either within the construction site or in approved on-street work zones. The construction program will be coordinated with surrounding projects, including the WSA, Bradfield Metro Station, M12 Motorway, and other private developments, to ensure impacts are minimised.

### **17.4.4 Street closures required for construction**

Prior to implementation of any road changes during construction, Council will be advised of this change and a suitable traffic control plan detailing times and dates of changes, signage, road markings will be submitted to council for approval. It is not envisaged that any street closures will affect neighbours.

A proposed strategy, in this respect will be developed in consultation with the Council prior to implementation. Any temporary road closures are to be confined where possible to weekends or non-peak-hour times and will be subject to the approval of Council.

### **17.4.5 Proposed truck wheel wash and shaker grid operations**

Appropriate measures will be installed on the site for the cleaning of trucks during the excavation stage. Vehicles will not be able to exit the site without running through the control measures.

#### **17.4.6 Materials Storage / Unloading**

- All materials are to be stored within the site boundary. This includes excavation machinery, building material and waste storage containers. All loading and unloading operations are to comply with Safe Work and any other statutory body requirements.
- Cranes and forklifts will be used to unload materials from the construction zone.
- Care is to be taken when locating stockpiles. Due to the nature of the site it will be necessary to review storage areas as the works progress.
- No materials are to be stored on public footpaths and / or roads.

#### **17.4.7 Mobile Cranage**

Were possible the majority of lifting and material movements on site will be achieved by the use of a tower type Luffing crane. However there will be occasions where it will be necessary to use mobile crane, were possible all mobile crane set-ups will be contained within the site. On occasions where it is necessary to utilise mobile cranes outside the boundary application for full or partial road closure will be made to the appropriate authorities prior to commencing works. It should be noted that all statutory body requirements including Safe Work Australia will be complied with while using the mobile crane (refer also to road closures).

#### **17.4.8 Consultation**

Consultation will be undertaken with the following authority bodies throughout the duration of the project

- Liverpool City Council
- Planning NSW Regulations
- TfNSW
- NSW Police

### **17.5 Pedestrian Traffic**

Throughout the construction phase of the works to be carried out on the site the following management procedures are to be implemented.

#### **17.5.1 Proposed protection for pedestrians using the road shoulder adjacent to the Site.**

Works will generally be contained within the site boundary. In instances where work is required to be executed outside of the site, warning signage and pedestrian redirection measures will be employed.

#### **17.5.2 Proposed pedestrian management while construction vehicles are entering and leaving the site**

Due care is to be taken by all vehicles entering and leaving the site. Signs alerting both pedestrians & drivers of the potential danger will be posted for added protection. When required, flagmen will be posted to manage the movement of pedestrians and vehicles onto and off the site.

### **17.5.3 Provision of night lighting, protective barriers**

Appropriate night lighting and barriers will be installed and maintained where considered appropriate to all site entries and utility infrastructure works.

### **17.5.4 Public Protection**

Hoardings & or fencing will be installed to the perimeter of the building works where the works impact on the roads or footpaths and to prevent the free access of the public onto the building site. It should be noted that prior to installation of the proposed hoardings if required, application will be made to the appropriate authority.

### **17.5.5 Consultation**

Consultation will be undertaken with the following authority bodies

- Liverpool City Council
- Planning NSW Regulations
- TfNSW
- NSW Police

## **18 COMMUNITY MANAGEMENT PLAN**

### **18.1 Community Liaison**

Bradfield Corporation wishes to leave a positive legacy for surrounding buildings as well as minimise the nuisance caused to the users of area, particularly occupants of adjacent buildings. We understand the need for sensitive engagement and communication with neighbouring properties and from this, that maintaining good relationships with neighbours is a key measure of the project's success. Bradfield Corporation will develop detailed work methods with specific consideration to noise, dust and access issues so as to minimise the effect of construction activities on the normal access to the properties, and so as to minimise disruption to the normal commercial activities of those properties.

Bradfield Corporation will coordinate and liaise with Liverpool City Council and neighbours within the area through ongoing community consultation and communication. The Project Manager and/or On Site Construction Manager will keep local residents informed on the following:

1. Access to their properties
2. Activities that may significantly disrupt residents or the use of their premises
3. Name and contact number of Bradfield Corporation representative
4. Extended working hours

### **18.2 Continuity of Public Access surrounding the work site**

Bradfield Corporation will Ensure all temporary public access areas are to be kept clean to the satisfaction of Liverpool City Council, as well as be responsible for maintaining areas surrounding the work site to be in a fully operational condition for use by the following personnel, including but not limited to:

1. Pedestrians / general public
2. Council maintenance vehicles
3. Occupants of buildings and adjacent dwellings
4. Motorists
5. Bus drivers and Taxi drivers
6. Truck drivers
7. Delivery personnel
8. All of the utilities (including electricity, communication, gas, water, sewers & SRA)
9. Police
10. Maintenance workers

Bradfield Corporation will provide temporary access points or bridges across the footpath during construction together with associated safety signage and exclusion barricades where the footpath is not suitable for normal safe pedestrian traffic flow.

### **18.3 Site Personnel Conduct**

Bradfield Corporation will take responsibility for the suitability of all workers and Subcontractors on site, set reasonable standards of conduct, investigate complaints about their behaviour and take appropriate action including removal from site if so warranted.

**APPENDIX A – IMS (QHSE)POLICY**  
To be developed after design completion



**APPENDIX B – PROJECT RISK ASSESSMENT**  
To be developed after design completion

**APPENDIX C – PROJECT TRAINING REGISTER**

To be developed after design completion

**APPENDIX D - ITP (INSPECTION TEST PLANS)**

To be developed after design completion

**APPENDIX E – CMP (CONSTRUCTION MANAGEMENT PLAN)**

Detailed CMP to be developed after design completion

**APPENDIX F – EAIR (ENVIRONMENTAL ASPECTS + IMPACTS REGISTER)**

To be developed after design completion



**APPENDIX G – EMP (EMERGENCY MANAGEMENT PLAN)**

To be developed after design completion



## **APPENDIX H – TMP (TRAFFIC MANAGEMENT PLAN)**

Preliminary TMP is attached, Detailed CTMP will be prepared during Detailed Design Stage





**APPENDIX J— DUST MITIGATION PLAN**  
To be developed after design completion



**APPENDIX K– WHSR MANAGEMENT PLAN**

To be developed after design completion