

**CONSTRUCTION & ENVIRONMENTAL
MANAGEMENT PLAN**

Property Address

16-20 Old Castle Hill Road, Castle Hill NSW

Prepared for

UPG Castle Corner Pty Ltd

Dated


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FIGURE

FIGURE 1: SITE PLAN

REFERENCES

- ANZG (2018) “Australian and New Zealand Guidelines for Fresh and Marine Water Quality”, Australian and New Zealand Governments and Australian State and Territory Governments, Canberra ACT.
- National Environmental Protection Council (NEPC) (1999) – *National Environmental Protection (Assessment of Site Contamination) Measure. Amendment 2013*
- National Health and Medical Research Council (NHMRC) & National Resource Management Ministerial Council (NRMMC) “National Water Quality Management Strategy, Australian Drinking Water Guidelines” (2011)
- NSW EPA (2014) “*Technical Note: Investigation of Service Station Sites*”.
- NSW EPA (2020), “Consultants Reporting on Contaminated Land”. NSW Environment Protection Authority, Parramatta
- NSW DEC “Guidelines for the NSW Site Auditor Scheme” (2017, 3rd edition). NSW Environment Protection Authority, Sydney.
- NSW EPA (2014) – “Waste Classification Guidelines, Part 1: Classifying Waste”;
- NSW EPA (2015) “Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997”;
- NSW EPA “Sampling Design Guidelines Part 1: Application” (2022). NSW Environment Protection Authority, Sydney.
- NSW EPA “Sampling Design Guidelines Part 2: Interpretation” (2022). NSW Environment Protection Authority, Sydney.

1.0 Introduction

This Construction Environment Management Plan (CEMP) supports a State Significant Development Application (SSDA) being lodged with the Department of Planning, Housing and Infrastructure (DPHI) for site establishment works facilitating a residential development including affordable housing at 16-20 Old Castle Hill Road, Castle Hill (the site). The proponent for the SSDA is UPG Castle Corner Pty Ltd (UPG).

This report also supports a State Significant Development Application and Concurrent Rezoning (SSDA) being lodged with the Department of Planning, Housing and Infrastructure (DPHI) for a residential development including affordable housing at 16-20 Old Castle Hill Road, Castle Hill (the site). The proponent for the SSDA is UPG Castle Corner Pty Ltd (UPG).

State Environmental Planning Policy (Planning Systems) 2022 (Planning Systems SEPP) identifies development which is declared to be State Significant. The site was declared SSD pursuant to State Significant Declaration Order 2025 (No 7) (the Order) issued on 13 May 2025.

This ‘Early Works’ SSDA seeks approval for site establishment, tree removal, bulk excavation, infrastructure services augmentation and ancillary site works. A separate ‘Main Works’ SSDA and Concurrent Rezoning seeks approval for the built form aspects of the residential flat building.

The proposal development consists of the following:

- Two residential towers, one at forty storeys and the other at thirty storeys, both rising above a shared podium.
- A common podium incorporating mixed-use functions at ground level (potential retail and /or commercial tenancies), residential apartments and shared building services areas.

- Six levels of basement parking.
- A pool and recreation area located at level thirty.

The proposal aims to:

- Facilitate transport-oriented development within an area of high amenity, promoting increases to both market and affordable housing supply proximate to public transport, open space, and employment.
- Respond to the housing challenges facing NSW through boosting the delivery of housing in an area of growth.
- Align with the NSW Government’s strategic ambitions to deliver 23,300 homes in The Hills by 2029.
- Deliver affordable housing in accordance with the in-fill affordable housing provisions of State Environmental Planning Policy (Housing) 2021.
- Deliver a built form that relates to the surrounding context and respects the character of its environs.

The construction program will be undertaken with all due regard to the environment and to statutory requirements.

All relevant regulations are covered by the Protection of the Environment and Operations Act 1997 (POEO). All due care is ensured so that the following conditions were specifically complied with:

- Minimal wind borne dust leaves the confines of the site;
- Water containing any suspended matter or contaminants is managed within the confines of the site in such a manner that minimal pollution of adjacent sites, including waterways, occurs;
- Vehicles will be controlled such that minimal mud, soil or water will fall or be deposited on any public or private roadway or adjacent areas;

- Noise and vibration levels at the site boundary will comply with the required legislative requirements.
- All approvals for site works are under regulatory framework (i.e. approvals for tree removal, demolition, remedial works, etc). SEPP55 forms the basis of the remedial scope that council abides by.
- All environmental controls are adhered to as set by the Environmental Representative.

The principal's environmental representative will ensure that the contractor's site manager/foreman is conversant with the contents of the Construction & Environmental Management Plan (CEMP) and that he will ensure that each employee or sub-contractor employed by the contractor is familiarised with the requirements of the CEMP. Works conducted on site will be conducted in accordance with Workcover standards and that an appropriate community consultation programme is implemented when required.

2.0 Site Information

The site is situated at 16-20 Old Castle Hill Road, Castle Hill, within The Hills Local Government Area (LGA). It is well located, being approximately 250m from Castle Hill Metro Station which provides services to Rouse Hill, Macquarie Park, Chatswood and the Sydney CBD. It is equally proximate to Castle Towers shopping centre, a major regional retail hub. The site has ready access to public open space being less than 100m from Arthur Whitling Park and Eric Fenton Reserve.

The site is located at the corner of Old Castle Hill Road and McMullen Avenue comprising an area of 3,180.4m². It comprises 4 lots in an irregular configuration, legally described as:

- Lot 10 in DP 881332.
- Lot 11 in DP 881332.
- Lot 20 in DP 222257.
- Lot 1 in DP 204335.

The site currently contains development comprising two detached residential dwellings located on 18 and 20 Castle Hill Road. There is currently no development on 16 Castle Hill Road. The site is covered in dense vegetation and has a steep slope upwards from the north-west to the south-east.

The site is identified as follows:

Site Identifier	Site Details
Site Location	16-20 Old Castle Hill Road, Castle Hill NSW NSW
Lot/DP	Lot 11 in DP881332 – 18 Old Castle Hill Road Lot 10 in DP881332 – 16 Old Castle Hill Road Lot 1 in DP204335 – 20 Old Castle Hill Road Lot 20 in DP222257 – 20 Old Castle Hill Road
Site Coordinates #	NE Corner: Latitude: -33.729965, Longitude: 151.009557
Site Area #	Approximately 3,180.4m ²

Local Government Area (LGA)	The Hills Shire Council
Zoning##	R2 – Low Density Residential

A high-level summary of the proposed development is described below, with further details provided within the Environmental Impact Assessment (EIS). The SSDA seeks approval for:

Early works including:

- Demolition and bulk excavation and activities.
- Infrastructure services coordination and deviation.
- Erosion and sediment control; and
- Removal of trees.

The 'Main Works' SSDA seeks approval for:

- The construction and operation of a 40-storey residential flat building, comprising the following:
 - Market and affordable housing units.
 - Basement parking.
 - Communal open space.
 - Associated landscaping and public domain works.

The proposal development comprises the following:

- Two residential towers, one at forty storeys and the other at thirty storeys, both rising above a shared podium.
- A common podium incorporating mixed-use functions at ground level (potential retail and /or commercial tenancies), residential apartments and shared building services areas.
- Six levels of basement parking
- A pool and recreation area located at level thirty.

Refer to **Appendix E** – Proposed Development Plans.

3.0 Asbestos Management

It is recommended any asbestos containing material, be managed in accordance with the following scope of works.

General Advice Prior to Works

1. The Site Owner and Contractor is responsible for implementing the following;
2. Refer to the Work Health and Safety Regulations 2017 and NSW WorkCover Code of Practice: *How to Safely Remove Asbestos* which outlines the appropriate measures for the safe removal of asbestos.
3. At least 2 working days' notice before commencement, signage which should include the date, time and removals details need be establish.
4. In accordance with this prohibition notice asbestos containing material should not be further damaged or impacted during site works in order to prevent release of fibres.
5. In the event of any previously unidentified asbestos contamination being detected notification to the On-Site Environmental Engineer/Hygienist will be given immediately.
6. Where there is an immediate risk to workers health and safety all works will be ceased until appropriate safety measures can be implemented.
7. Due to the nature of the area and the potential for both **NON-FRIABLE / FRIABLE ASBESTOS** to be released it is advised that a contractor with suitable experience and expertise shall move/remove the asbestos cement sheeting pieces from the impacted area. As such it is recommended that a contractor with a Friable Asbestos license (Class A) be engaged to move/remove any asbestos containing materials from within the site.
8. The licensed contractor with suitable experience is to prepare an Asbestos Removal Control Plan (ARCP) and a Safe Works Method Statement (SWMS). This should be in accordance with NSW SafeWork Code of Practice: *How to Safely Remove Asbestos - Appendix B* and should detail Notification and removal methods. Safe work method statements should detail measures to protect

workers and be site specific. This methodology should be prepared in accordance with this document.

Site Specific Remediation Methods – Stage 1 – General Setup Works

9. If asbestos contamination was identified within a specified area within the boundaries of the work site, the creation of an exclusion zone with appropriate restriction and warning signs (in accordance with AS1319) around the impacted area shall be created so that no unauthorised persons can enter the impacted area. The exclusion zone should be at least 5 metres (if possible) on a non-windy day around the impacted area and extended out to 10 metres on windy days (if possible). Temporary fencing or other barriers (site fencing) are to be used to create this designated zone.
10. Appropriate decontamination areas have been designated for workers prior to exit out of contaminated exclusion zone(s), and disposable coveralls will be disposed of into double sealed bags within the decontamination area prior to leaving the exclusion zone(s).
11. All staff working within the exclusion zone will use personal protective equipment including disposable coveralls and a suitable respirator, gloves and eyewear in accordance with relevant Australian Standards. Coveralls with Velcro seals are not suitable for asbestos work (for further detail see PPE requirements section below).

General Works

12. Once contaminated materials are loaded all machinery is to be vacuumed and hosed down and wiped within the decontamination zone.
13. Demolition of the remaining buildings frames may occur once the asbestos has been removed successfully. If in the event that any residual asbestos obscured by the former building is uncovered, then this should be wetted down and removed as per the rest of the site.
14. Licensed trucks under appropriate methods of dust avoidance and covered with double lined polyurethane plastic will transport asbestos material from areas

within the exclusion zone to a licensed landfill in accordance with the appropriate classification. Once demolition is completed then the machinery should again be removed.

15. Inspection from a suitably qualified environmental/occupational hygienist once removal work has been completed to confirm that all asbestos materials have been removed competently from the works area. The competent person for a clearance certificate must have experience in asbestos identification and be a licensed asbestos assessor with Safework NSW.
16. A clearance certificate will then be prepared by an independent and suitably qualified environmental/occupational hygienist detailing the remediation procedures, site photographs and laboratory sample results with the above qualifications.

PPE Requirements

For the clean-up period all contractor personnel working at any time in the vicinity of removed asbestos materials shall wear the following personal protective equipment (PPE):

- Safety boots meeting AS 2210. If working with contaminated materials lace less boots such as gumboots are preferred where practicable. If boot covers are worn, they should be of a type that has anti-slip soles to reduce the risk of slipping
- Hard hats meeting AS 1801 (when working near equipment)
- Gloves meeting AS 2162 (when appropriate)
- Hearing protection meeting AS 1270 (when working near equipment)
- Long sleeved shirts, buttoned to the wrist, and long trousers (when working near excavated materials that have not been identified to be contaminated)
- Disposable Tyvec Suits (chemical resistant overalls) to be worn for persons coming into physical contact with contaminated materials. Disposable coveralls rated type 5, category 3 (prEN ISO 13982–1) or equivalent would meet this standard
- Where a risk is present to sight, safety eyewear and shields meeting AS 1337.

- Respiratory Protection in accordance with AS/NZS 1715:1994 and the table below
- Maintain personal hygiene practices

When the above PPE is used, full protection from the above-mentioned Potential Hazard Sources is maintained. If a worker is not certain about their exposure the site environmental representative should be contacted for advice on PPE. Personnel must always wear PPE in areas where exposure risk is unknown.

Selection of RPE

The most efficient respirator and filter for the task should be used. Proper fit is critical and especially with a disposable half-face respirator is difficult. Consideration should be given to upgrading to a non-disposable half-face respirator.

The following table identifies the correct RPE for differing situations. For the site the following RPE selected has been highlighted (yellow) within the table.

Work Procedure	Required respirator	Filter type
Simple enclosure erection for containing undamaged asbestos materials to prevent damage – no direct handling but possible disturbance of asbestos	Disposable, half-face particulate respirators OR Half-face, particulate filter (cartridge) respirator	P1 or P2
Inspection of the condition of any installed friable asbestos, which appears in poor condition or has been disturbed	Disposable, half-face particulate respirators OR Half-face, particulate filter (cartridge) respirator	P1 or P2
Sampling material for the purpose of identifying asbestos	Disposable, half-face particulate respirators OR Half-face, particulate filter (cartridge) respirator	P1 or P2
Removal of non-friable asbestos (e.g. asbestos cement sheets, ceiling tiles and vinyl tiles)	Disposable, half-face particulate respirators OR Half-face, particulate filter (cartridge) respirator	P2

Extensive sample operations on friable asbestos	Full-face, particulate, filter (cartridge) respirator	P3
Maintenance work involving the removal of small quantities of friable asbestos (e.g. replacement of friable asbestos gaskets and insulation)	Full-face, particulate, filter (cartridge) respirator	P3
Certain forms of wet stripping in which wetting is prolonged and effective, and certain small-scale dry stripping operations	Full-face, powered air-purifying particulate respirator OR Full-face, positive pressure demand air-line respirator	P3
Certain forms of dry stripping and ineffective wet stripping (light wetting, no time given to saturate)	Full-face, powered air-purifying particulate respirator OR Full-face, positive pressure demand air-line respirator No lesser respirator will suffice	P3
Dry stripping in confined areas	Full suit or hood, positive pressure demand continuous flow air-line respirator No lesser respirator will suffice	P3 only as a backup

Workers should be consulted on the selection of RPE to ensure individual fit and medical factors have been considered.

4.0 Demolition

Demolition works are to be completed in accordance with SafeWork NSW Standards, Codes of Practice and council DA requirements. Any asbestos identified within the building materials should be managed in accordance with the SafeWork NSW Codes of Practice and Australian Standards.

5.0 Traffic Management

The management of the material leaving the site will be under the monitoring of the principal's environmental representative, who will record the details of these materials.

Vehicular movement is to be conducted in accordance with Council requirements. The contractor will install a vehicle wheel washing or shaking facility and will manage all

vehicles as indicated by the principal's environmental representative (FES) to minimise tracking of any materials onto public roads. The wheels of the vehicles will be washed and brushed prior to leaving the site. Loads leaving the site should be maintained moist and must be covered to prevent materials from the site being spilled or left on public or private roadway or adjacent areas. Care should be taken if UST or any unexpected material has been encountered and are to be removed from the site.

6.0 Surface Water and Soil Management

The contractor will put in place adequate stormwater runoff, run-on and sediment control measures for the remedial works. These requirements are outlined in Schedule B (9) of the (*site contamination*) NEPM (2013).

These include stockpiling any excavated soil in a manner that will prevent contamination from being transported off-site by stormwater, and include the following measures:

- Divert stormwater runoff outside the site so that it does not flow through the site.
- Control drainage on the site by intercepting and redirecting runoff in a controlled manner.
- Stormwater collected at the site in trenches and sumps should be appropriately managed; and
- Silt stop fences should be erected at locations where stormwater may flow outside the site.

The presence of sediment in surface water or runoff must be minimised by the use of sediment controls such as diversion drains, hay bales and silt fencing.

Soils that require stockpiling must be managed in such a manner that these materials remain well contained and easily identifiable and that the effects of wind and rain have minimal impact on their integrity. Subsequently, if adverse weather conditions are

anticipated, or if the stockpile is to remain on-site for an extended period, stockpiles must be protected and covered. Stockpile records must be maintained to track the re-use of soils at the site (if any).

Any plant or equipment that comes into contact with soils must be inspected prior to leaving the site and cleaned as necessary.

7.0 Groundwater and Excavation Pump Out

If groundwater is encountered during excavation works, the groundwater is to be directed to and collected in trenches and sumps. No discharge of groundwater will occur without approval of appropriate regulatory bodies.

8.0 Stockpiles

Any stockpiles created should be managed to minimise the risk of dust generation, erosion and leaching. The measures required to achieve this should include:

- Restrict the height of stockpiles to reduce dust generation.
- Construct erosion, sediment and runoff control measures.
- Cover stockpiles of contaminated soils to be left on site for more than 24 hours, or if windy conditions are expected.
- Manage the potential for leaching

9.0 Site Signage & Site Access

The contractor will ensure that adequate barriers have been placed around the site to prevent access of unauthorised personnel to areas where contaminated material is exposed. The contractor will also place adequate warning signs around the site.

10.0 Project Contact Information & Principal’s Environmental Representative

The contact details for the principal’s environmental representative are as follows:

Environmental Representative	
Company	Foundation Earth Sciences Pty Ltd
Postal Address	PO Box 4405, East Gosford NSW 2250
24hr Contact Number	0466385221 (mobile)
Email	ben@foundations.com.au
Contact	Ben Buckley

Project Contact	
Client	UPG Castle Corner Pty Ltd
Contact Number	0434 520 242
Email	c.youssef@urbanpropertygroup.com.au

11.0 Working Hours & Site Security

Access to the site will be permitted between the hours of 7.00 AM to 5.00 PM Monday to Friday inclusive. Work may be available on Saturdays from 7.00 AM to 1.00 PM. No access will be permitted on Sundays and Public Holidays.

If work is required other than ordinary working weekdays or outside regular working hours, the contractor or any subcontractor shall give due notice of the intention to do so and obtain prior approval of the site owner.

Temporary fence will be installed for full perimeter and gate will be locked with chain. Mobile security cameras will also be set for all entry points.

12.0 Importation of Fill

Importation of any soil, rock or aggregate is required to meet the following requirements:

- They must be legally able to be imported onto the site in accordance with the Protection of the Environment Operations (Waste) Regulation 2014 and any required consent approvals.
- The soils must be classified as Virgin Excavated Natural Material (VENM), Excavated Natural Material (ENM) or other materials legally able to be imported onto the site based on a Resource Recovery Exemptions. Where available VENM should be imported in preference to ENM. Soils must be assessed in accordance with the EPA requirements.
- Prior to importation appropriate documentation needs to be provided to, and approved by, the Environmental Consultant and the materials must be inspected at the source site to confirm that there are no signs of contamination.
- The material must be inspected during importation by the Contractor, and any materials not meeting the description given in the provided documentation or displaying signs of contamination will be rejected.

13.0 Waste Tracking

All transport of waste and disposal of materials must be conducted in accordance with the requirements of the POEO Act. All licences and approvals required for disposal of the material will be obtained prior to removal of the materials from the site.

Removal of waste materials from the site shall only be carried out by a licensed contractor holding appropriate licence, consent and/ or approvals to dispose of the waste materials according to the assigned waste classification, and with the appropriate approvals obtained from the EPA, if required. Details of all soils removed from the site (**including VENM**) shall be documented by the Contractor with copies of weighbridge slips, tip tickets

and consignment disposal confirmation (where appropriate) provided to the Environmental Consultant and the contractor.

A site log shall be maintained by the Contractor to track disposed loads against on-site origin. Transport of spoil shall be via a clearly delineated, pre-defined haul route. The proposed waste transport route will be notified to the local Council and truck dispatch shall be logged and recorded by the Contractor for each load leaving the site. A record of the truck dispatch will be provided to the contractor.

Details of all soils removed from the site (including VENM) shall be documented by the Contractor with source location, volume/tonnage, waste classification, disposal date, disposal destination, copies of weighbridge slips, landfill receipts/disposal docket, tip tickets and consignment disposal confirmation (where appropriate) provided to the Environmental Consultant and/or the NSW EPA Accredited Site Auditor.

Material tracking needs to include information on source location, volume /tonnage, waste classification, disposal date, disposal destination, disposal docket, including waste locate consignment number of any asbestos soil waste disposed, transporters details (including EPL No) and a tally of estimated versus actual volume disposed.

14.0 Special Waste (including Asbestos Waste)

All transport of waste and disposal of materials must be conducted in accordance with the requirements of the POEO Act. All licences and approvals required for disposal of the material will be obtained prior to removal of the materials from the site.

Asbestos transporters and facilities receiving asbestos waste in NSW weighing more than 100 kilograms or consisting of more than 10m² of asbestos sheeting in one load must track and report this waste to NSW EPA using WasteLocate.

Tracking of asbestos waste is to be done via the NSW EPA's online system known as WasteLocate.

Removal of waste materials from the site shall only be carried out by a licensed contractor holding appropriate licence, consent and/ or approvals to dispose of the waste materials according to the assigned waste classification, and with the appropriate approvals obtained from the EPA, if required. Details of all soils removed from the site shall be documented by the Contractor with copies of weighbridge slips, tip tickets and consignment disposal confirmation (where appropriate) provided to the Environmental Consultant and the contractor.

A site log shall be maintained by the Contractor to track disposed loads against on-site origin. Transport of spoil shall be via a clearly delineated, pre-defined haul route. The proposed waste transport route will be notified to the local Council and truck dispatch shall be logged and recorded by the Contractor for each load leaving the site. A record of the truck dispatch will be provided to the contractor.

15.0 Hazardous Waste

Prior to the removal of any hazardous waste to a suitable licensed facility any hazardous waste is immobilised in accordance with the terms of any general immobilisation approval or specific immobilisation approval. Any immobilised waste that is transported is tracked using the using the EPA's online waste tracking system.

16.0 Control of Stormwater and Erosion

The contractor will control surface waters on and adjacent to the site as follows:

- Divert stormwater runoff outside the site so that it does not flow through the site.

- Control drainage on the site by interception and redirecting runoff in a controlled manner.
- Stormwater collected from the site in trenches and sumps will be appropriately managed, however are unlikely to be used within this development.
- Any Remedial Stockpiles will be appropriately bunded so as not to allow contaminants to escape into other areas.
- Silt stop fences will be erected at locations where stormwater may flow from the site and where areas of heavy erosion may be likely.

No surface waters are to be allowed to be removed from site unless appropriate approvals have been attained from regulators.

Refer to Site specific – Sediment and Erosion Control Plan.

17.0 Control of Dust & Odour

The generation of dust will be kept to a minimum. Water sprays will be used to ensure suppression of dust on all excavated areas and whilst loading of waste type materials. Water used for dust suppression will not be allowed to escape off-site by the stormwater system, sewer, or any other means.

Odours are not expected during the earthworks, but if malodorous compounds are encountered, the contractor shall take all precautions to ensure that minimal obnoxious odours migrate from the site boundaries. To minimise odours if encountered, it is proposed to excavate only small volumes of soil at any one time. Any soil containing significant quantities of odorous compounds would be placed as soon as possible in a bunded area and covered with HDPE sheeting and sprayed with a Foundation Earth Sciences approved odour suppressant.

Airborne contaminants are inhalable particles suspended in the air that may enter the body. Most large particles are stopped in the nose, but smaller respirable particles reach the lungs. Inhaled contaminants may cause tissue damage, tissue reaction, disease, or physical obstruction.

Indicators of a need for air monitoring in your workplace may include:

- frequent or long duration use of a chemical or process which generates hazardous vapour, dust, mist or fume
- efficiency of ventilation is not known or no mechanical ventilation
- people in the workplace are complaining of health concerns that may be due to the vapour, dust, mist or fumes
- there is the potential for serious health effects if controls are inadequate; and/or
- it is a complex work environment, and it is difficult to estimate exposure.

The most common disease-causing hazard exposure reported by workers in the construction industry was airborne hazards (69%). Types of airborne hazards reported by workers included dust (66%) and gases, vapours or fumes (24%).

Types of dust reported by construction workers included:

- silica
- acrylic materials
- dust from machinery
- alumina/ aluminium dust
- brake dust
- bricks
- concrete
- dirt
- plaster
- sand and timber

Gases, vapours and fumes reported by construction workers included exhaust fumes, paint fumes and petrol/ diesel fumes.

18.0 Landscaping and Rehabilitation

The contractor will ensure that adequate barriers have been placed around any protection areas and/or follow the landscaping / rehabilitation requirements outlined in the approved DA. The contractor will also place adequate warning signs around the site where required.

19.0 Removal of Underground Storage Tanks (USTs)

Any unexpected USTs found within the site should be removed in accordance with SafeWork NSW & UPSS Regulation 2014 requirements, and AS4897-2008: The design, installation and operation of underground petroleum storage systems. In the event of conflict between the guidance documents, the latter shall prevail. Due to the volatile nature of petroleum storage tanks, it is recommended that the USTs be excavated and disposed of by an experienced contractor and with an environmental representative present.

Following the removal of any USTs and associated visibly stained or odorous soils, in samples should be collected from the walls and floor of the tank-pits/hotspots and submitted to a NATA accredited laboratory for analysis. The targeted analytes should be, but not be limited to, heavy metals, TPH, BTEX & PAH.

The minimum sampling protocols to be used for unexpected UST areas include:

- 3 samples per backfill UST sands per UST pit.
- 1 sample per tank line.

- 1 sample per vent pipe area.
- 1 sample per spill box (currently not present but may be found).
- 2 base samples and 8 walls (2 samples per wall face) of each tank pit

20.0 Containment / Capping of Contaminated Soil

On-site capping is used to isolate areas in the subsurface from the surrounding uncontaminated environment. A physical barrier such as a layer of clean soil, synthetic material liners, asphalt and concrete layers may be installed to cap the contaminated material. A cap is typically used where it is required to remove exposure to the contaminated soils and where the contaminated soils are not mobile or there is no contact with groundwater and / or groundwater is not contaminated.

A site management plan is required with any cap and contain strategy. The site management plan identifies the party responsible for adhering to the plan and includes commitments for ongoing monitoring and maintenance of the cap as well as control of future excavations, which must be minimised or if required, the appropriate occupational health and safety procedures are adopted and permits acquired before work is carried out.

21.0 Work Health & Safety

As personnel on-site may be exposed to potentially toxic or hazardous compounds, the Contractor will prepare a site-specific Work Health and Safety Plan (WHS) prior to commencement of remediation and validation work in accordance with relevant legislation. The WHS will identify hazards, assess the risks posed by the hazards and recommend measures to control the hazards. This should include detailed descriptions of vehicle decontamination, protective clothing, equipment and appropriate safety controls that will be adopted during remediation and validation works carried out at the site.

Personnel working on the site are required to read and understand the Work Health and Safety Plan. All staff working on the site must be inducted and must sign the relevant authority form. The contractor is to comply with all statutory requirements for safety. All accidents must be reported to the principal's environmental representative.

22.0 Waste Storage and Recycling Control

As part of the construction process, construction material including packaging container off-cuts, surplus items and spoiled material will be accumulated. These materials need to be reused, recycled or disposed of in the appropriate manner. Separate storage areas for construction materials should be utilised on site (i.e. area for steel, timber etc) or alternatively a skip bin should be provided to place all waste construction materials in for recycling.

23.0 General Waste Control

As part of any operation, waste material and other general refuse accumulate in the general working areas. These must be maintained to avoid nuisance and health concerns. Waste bins will be provided on site for general refuse, and it will be the site foreman's responsibility to maintain site cleanliness by firstly making it aware to all contractors and secondly enforcing this CEMP.

The development program will be undertaken with all due regard to the environment and to statutory requirements.

The development of the site will comply with the environmental requirements of the following:

- Protection of the Environment Operations Act

- Hazardous Chemicals Act
- Waste Avoidance and Resource Recovery Act
- Environmentally Hazardous Chemicals Act
- Dangerous Goods Act
- Noise Control Act
- Construction Safety Act

In particular, in addition to any statutory compliance's required by the above-mentioned Acts, the contractor will be responsible for carrying out environmental compliance with all due care to ensure that the following conditions are specifically complied with:

- Minimal wind-borne dust leaves the confines of the site;
- Water containing any suspended matter or contaminants is managed within the confines of the site in such a manner that minimal pollution of adjacent sites, including waterways, occurs;
- Vehicles will be controlled such that minimal mud, soil or water will fall or be deposited on any public or private roadway or adjacent areas;
- Noise levels at the site boundary will comply with the required legislative requirements.

The principal's environmental representative (Foundation Earth Sciences) can ensure that the contractor's site manager/foreman is conversant with the contents of any CEMP and that he will ensure that each employee or sub-contractor employed by the contractor is familiarised with the requirements.

24.0 Contingencies

A basement and/or major excavation works are proposed as part of the proposed development. The following has been included as a precaution. The table below summarises conditions that can reasonably be expected and the resulting problems they

may cause, and how these problems may be resolved within the context of the proposed development.

ANTICIPATED PROBLEM	CORRECTIVE ACTION BY CONTRACTOR
Chemical spill / exposure	Stop work, refer to Occupational Health, Safety and Rehabilitation Plan and immediately contact Foundation Earth Sciences.
Excessive rain	Maintain access roads, cover high-traffic areas with gravel; or cover working areas/stockpiles with plastic during off-shifts; or shut down operations until runoff is more manageable. Inspect & maintain sediment control pond & filter fences.
Unmanageable mud in excavation zone	Improve drainage collection system; add geotextile/gravel in problem areas; or strip off mud/slurry materials; or excavate from the top of the fill.
Excessive drainage	Minimise active/contaminated work area; or improve diversion clean run-on; or maintain sufficient on-site wastewater storage capacity; or mobilise additional storage and/or treatment systems as needed.
Excessive dust	Use water sprays or biodegradable dust sprays, or cease dust-generating activity until better dust control can be achieved, or apply interim capping systems.
Sediment pond water for discharge – analytical results exceed site response levels	Perform in-situ treatment, e.g. flocculant dosing, until response levels are met. Alternatively arrange off-site disposal by a licensed Contractor.
Excessively wet materials	Stockpile and dewater on-site; or add absorbents.
Equipment failures	Maintain spare equipment or parts; or maintain alternate rental options; or shut down affected operations until repairs are made.
Release of fuel/oil from machinery	Remove source, use absorbent booms to remove oil and make any repairs as required.
Silt fence fails	Stop work and repair fence to specifications.
Excessive noise	Identify source and review noise attenuation equipment and as necessary provide silencers on noisy equipment.
Excessive odours	Monitor for volatiles using PID and upgrade PPE if necessary. Use odour and volatile suppressing agents to eliminate or reduce odours as required and/or cover odorous material if practicable.
Excavation extends below water table into natural materials which are assessed and confirmed to comprise potential acid sulphate soils (PASS).	Implement Acid Sulphate Soils management plan. This will include on-site treatment of the soils in the excavation area. Treatment would likely involve lime addition at a rate to be calculated using methods specified in the ASS Manual (1998).

ANTICIPATED PROBLEM	CORRECTIVE ACTION BY CONTRACTOR
Unearthing drummed material	Isolate and contact Foundation Earth Sciences. Arrange temporary storage in a secure part of the remediation site (to be nominated).
Contamination underneath the building footprint	Remove wire covers and excavate and remove offending contaminated soils (exceeding industrial guidelines) from the area

In addition to the above listed contingencies, the following steps may need to be undertaken should unexpected types of contaminants, non-spadeable sludges or buried drums be discovered during the remediation works:

- upgrade of personal protective equipment (PPE), for workers within the active work zone, in accordance with the site Occupational Health, Safety Plan;
- segregation and bunding of discovered material;
- use of odour suppressants (where appropriate);
- cover the discovered material with plastic sheeting;
- appropriate sampling and analysis to assess potential contaminants; and
- appropriate off-site disposal of the materials following receipt of analytical results and any associated regulatory approvals required.

25.0 Unexpected Finds Protocol

If during works, significant odours and/or evidence of gross contamination not previously detected are encountered, or any other significant unexpected occurrence, site works should cease in that area, at least temporarily, and immediate action taken to abate the odours or prevent / manage cross-contamination occurring. If required, the administering authority will be notified in writing within two working days of significant unexpected occurrence and informed of the remediation actions implemented.

The sampling strategy for each “unexpected find” shall be designed by a suitably qualified environmental consultant. The strategy will, however, be aimed at determining the nature of the substance – that is, is it hazardous and, if so, at concentrations which pose an

unacceptable risk to human health or the environment. The sampling frequency of the identified substance / materials shall meet the following minimum requirements:

- Excavation Floor
 - 1 sample every 25m²
 - Samples should be analysed for the chemicals of concern.
- Excavation Wall
 - 1 sample every 5m (from each distinct horizon / material type)
 - Samples should be analysed for the chemicals of concern.

All additional works should be documented by the use of field notes, site photographs, site plans and reporting.

Refer to **Appendix B** for a copy of the Unexpected Finds Protocol.

**APPENDIX A - NON-CONFORMANCE & CORRECTIVE ACTION FORM +
WASTE MANAGEMENT INFORMATION**

ISSUE:	WASTE MANAGEMENT
Legislation:	<i>Protection of the Environment Operations (Waste) Regulation 2014, Protection of the Environmental Operations Act 1997.</i>
Administered by:	NSW EPA and Local Government Authorities
<p>PRINCIPAL OBLIGATIONS:</p> <p>Protection of the Environment Operations Act</p> <ul style="list-style-type: none"> • Not to wilfully or negligently dispose of waste in a manner, which harms or is likely to harm the environment. • Not to wilfully or negligently cause any substance to leak, spill or otherwise escape in a manner that harms or is likely to harm the environment. • Not to cause or permit any waters to be polluted. • Not to cause air pollution or noise pollution due to improper and/or inefficient management of materials on a site. • To notify a pollution incident even though to do so might incriminate the person or make the person liable to a penalty. <p>Protection of the Environment Operations (Waste) Regulation 2014</p> <ul style="list-style-type: none"> • Ensure all reporting requirements for non-licenced landfills are adhered to. See Regulation for more details. • Ensure compliance with requirements of activities relating to non-licenced waste activities. 	
<p>DEFINITIONS:</p> <p>Protection of the Environment Operations Act</p> <ul style="list-style-type: none"> • Waste – includes any unwanted or surplus substance (whether solid, liquid or gaseous). A substance is not precluded from being waste merely because it may be reprocessed, re-used or recycled. • Harm – to the environment includes any direct or indirect alteration of the environment that has the effect of degrading the environment and, without limiting the generality of the above, includes any act or omission that results in pollution. • Dispose – of waste includes to dump, abandon, deposit, discard, reject, discharge or emit anything that constitutes waste, and also includes to cause or permit the disposal of waste. • Owner of waste - includes, in relation to waste that has been disposed of, the person who was the owner of the waste immediately before it was disposed of. • Container – includes anything used for the purpose of storing, transporting or handling the substance concerned. • Owner of a substance – includes, in relation to a substance that has leaked, spilled or otherwise escaped, the person who was the owner of the substance immediately before it leaked, spilled or otherwise escaped. • Pollute waters - includes cause or permit any waters to be polluted. 	

- **Deal with materials** – means process, handle, move, store or dispose of the materials
- **Materials** – includes raw materials, materials in the process of manufacture, manufactured materials, by-products or waste materials.
- **Approved Notice** – means a notice, in a form approved by the EPA: Stating that the place to which the notice relates can lawfully be used as a waste facility for the waste specified in the notice, and that contains a certification by the owner or occupier of the place that the statement is correct.
- **Authorised Officer** – means a person appointed by an appropriate regulatory authority
- **Enforcement Officer** – is a reference to a person belonging to a class of officers or employees prescribed by the regulations in relation to the offence.

Protection of the Environment Operations (Waste) Regulation

- **Licensed waste activity** – means an activity that is carried on for business or other commercial purposes, and involves the generating or storage of any one or more of the following types of waste hazardous, industrial, Group A waste and waste that is licensed under the Act.
- **Non licensed waste activity** – means an activity that is carried on for business or other commercial purposes, and involves the generating or storage of any one or more of the following, and involves the generating or storage of any one or more of the following types of waste: hazardous waste, Industrial waste, Group A waste, and is not licensed under the Act
- **Transporter** – of waste means the person transporting waste from the consignor of the waste to the consignee.
- **Authorised contractor** – means a person who is licensed under the Act to transport waste and is specifically authorised under that licence to transport waste from premises on which non-licensed waste activities are carried on, and to perform the requirements set out in the Regulation, on behalf of the person carrying on the non-licensed waste activity concerned.

LICENCES/PERMITS/CONSENTS

- See Protection of the Environment Operations (Waste) Regulation 2014 for more details.

OBLIGATION TO REPORT

Protection of the Environment Operations Act 1997

- A person is required to notify a pollution incident even though to do so might incriminate the person or make the person liable to a penalty
- Any notification given by a person noted above is not admissible in evidence against the person for an offence or for the imposition of a penalty. Although this does not apply to evidence obtained following or a result of the notification.

Non-Conformance and Corrective Action Form

Project:

Name: _____

Time: _____

Title: _____

Date: _____

Signed: _____

Details and Nature of Non-Conformance:

Personnel Advised: _____

Complaints from Public or Residents:

Further works required:

Corrective Actions to be taken:

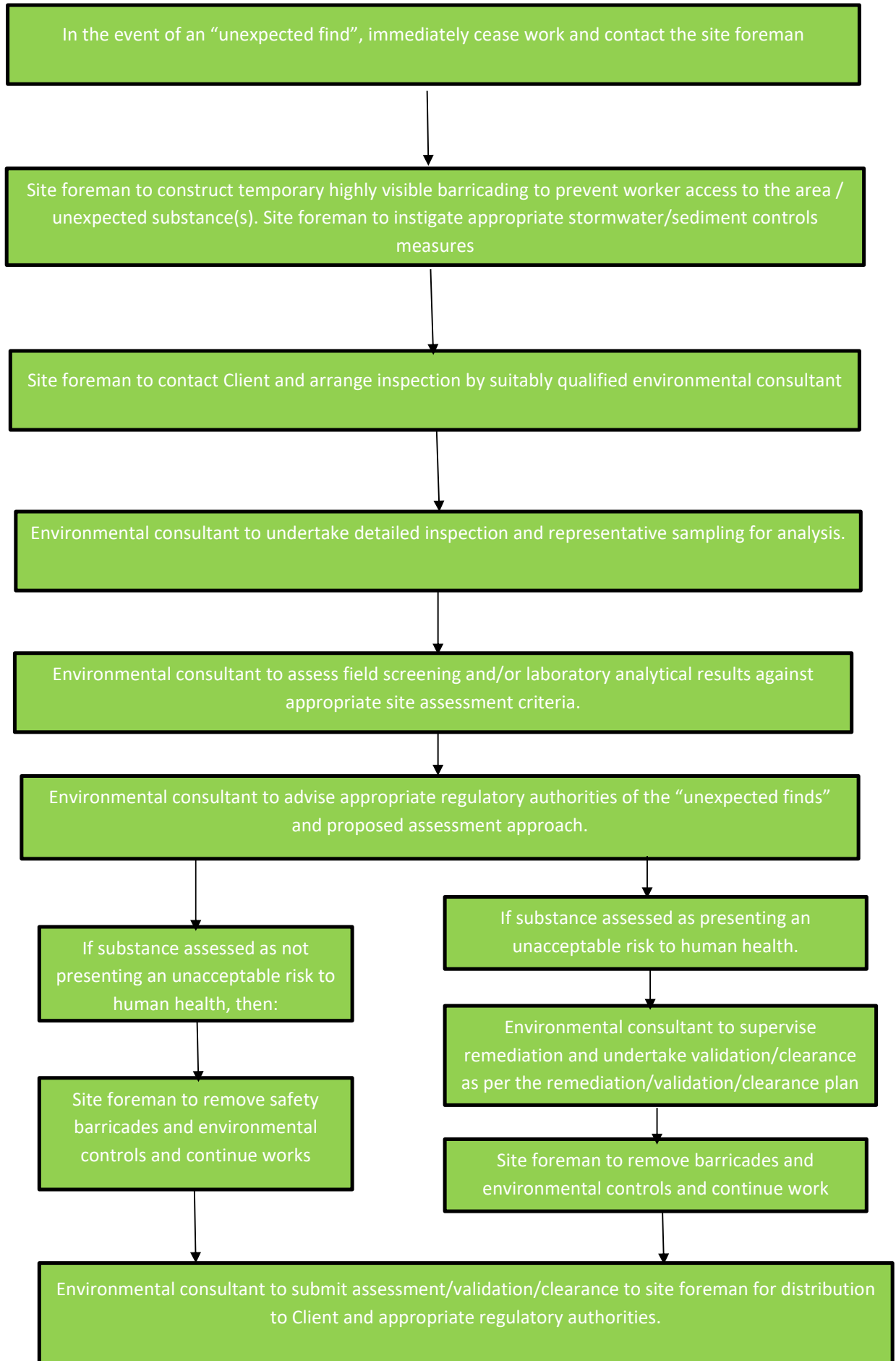
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Title: _____

Signed: _____

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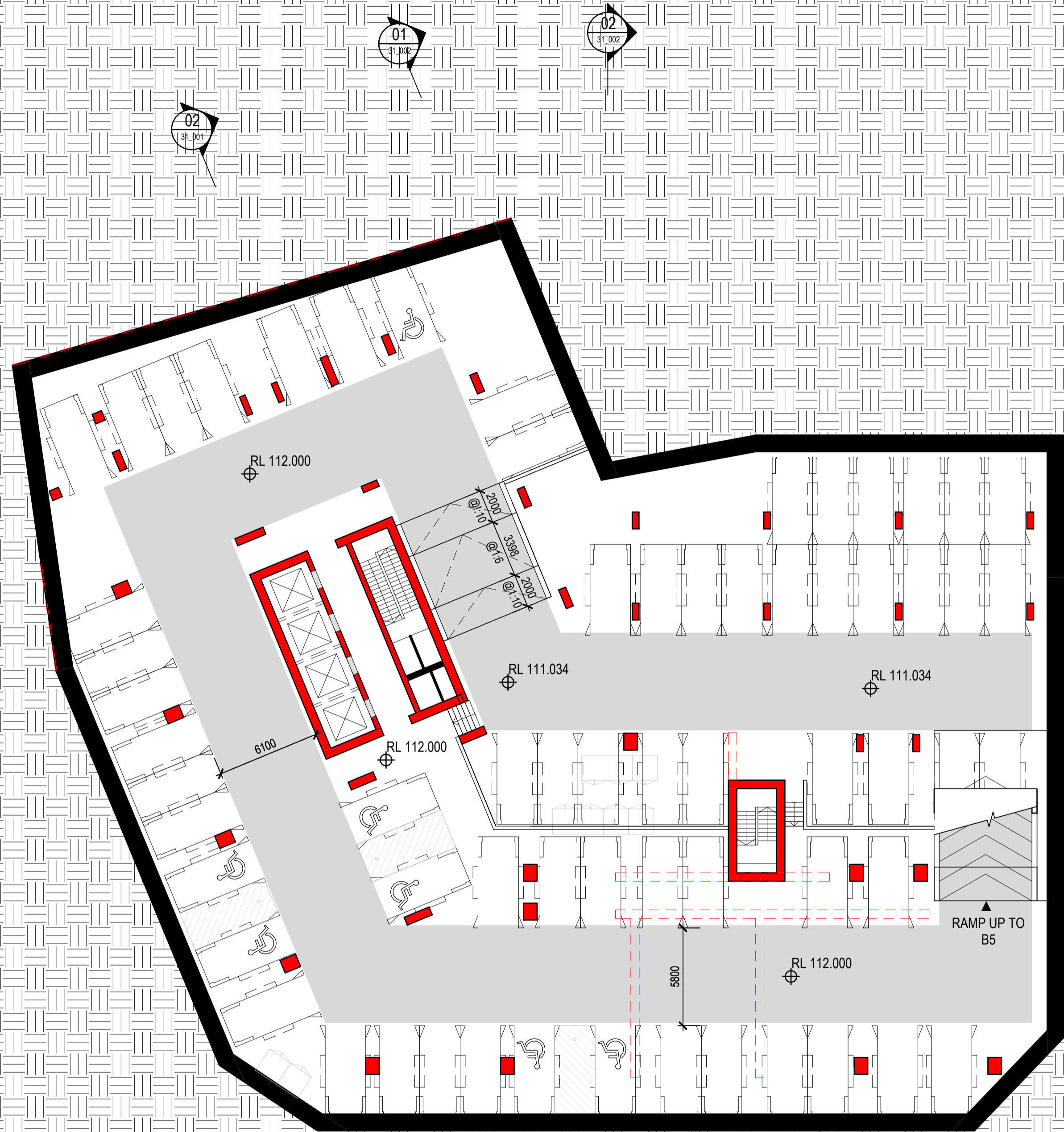
APPENDIX B– UNEXPECTED FINDS PROTOCOL



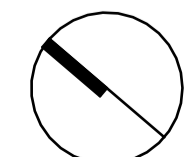
APPENDIX C– PROPOSED DEVELOPMENT PLANS

PARKING SCHEDULE

Level	Type			Total
	Standard	DDA	Tandem	
BASEMENT 1	49	7	6	62
BASEMENT 2	49	7	6	62
BASEMENT 3	49	7	6	62
BASEMENT 4	49	7	6	62
BASEMENT 5	49	7	6	62
BASEMENT 6	51	7	6	64
	296	42	36	374



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[Status] PRELIMINARY

[Nom. Architect] Nicholas Bandounas /8499

[File] 20240027-AB-SK001-R24

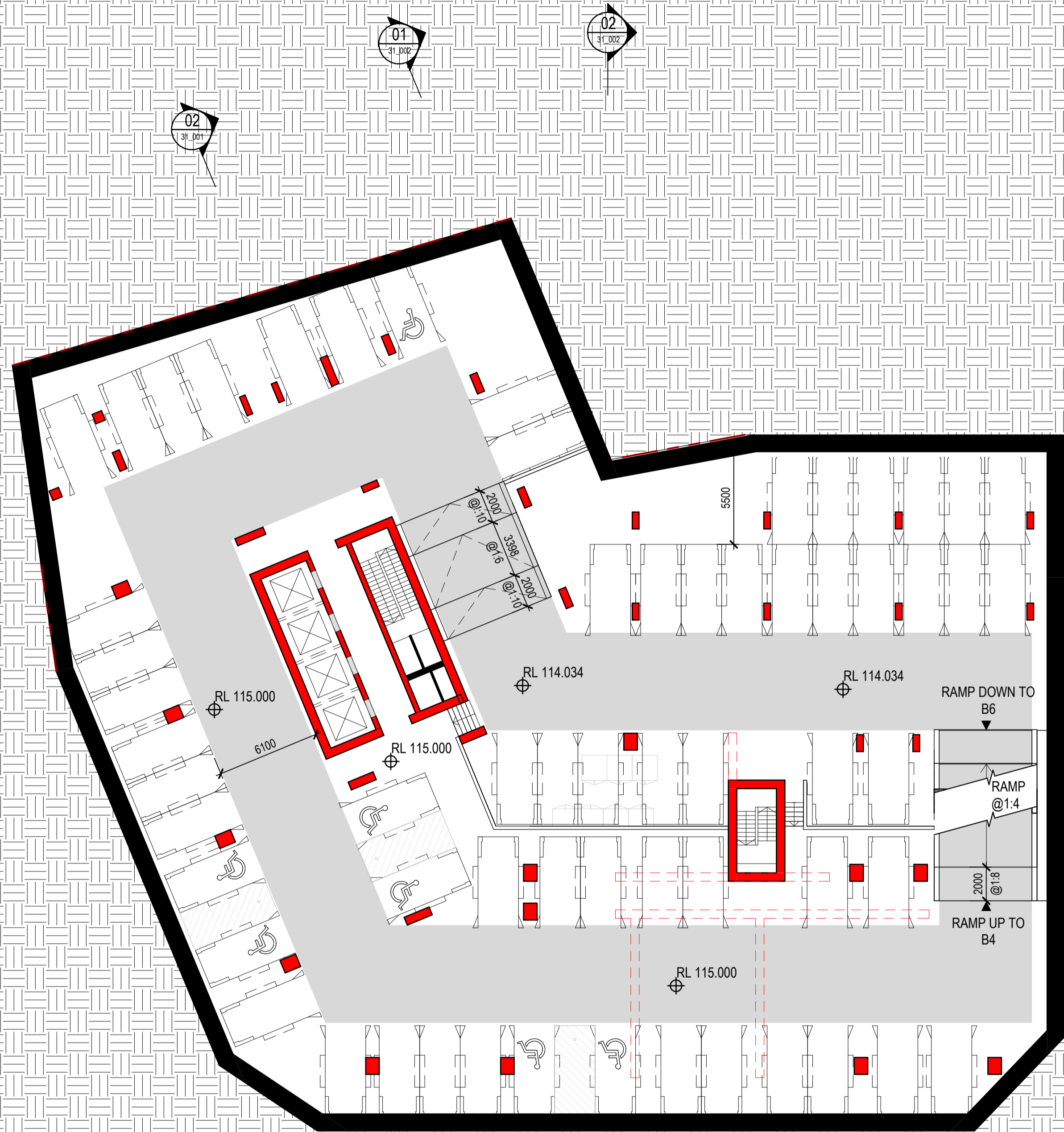
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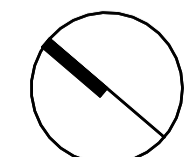
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B	FOR COORDINATION	04.11.2025

PARKING SCHEDULE

Level	Type			Total
	Standard	DDA	Tandem	
BASEMENT 1	49	7	6	62
BASEMENT 2	49	7	6	62
BASEMENT 3	49	7	6	62
BASEMENT 4	49	7	6	62
BASEMENT 5	49	7	6	62
BASEMENT 6	51	7	6	64
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[Status] PRELIMINARY

[Nom. Architect] Nicholas Bandounas /8499

[File] 20240027-AB-SK001-R24

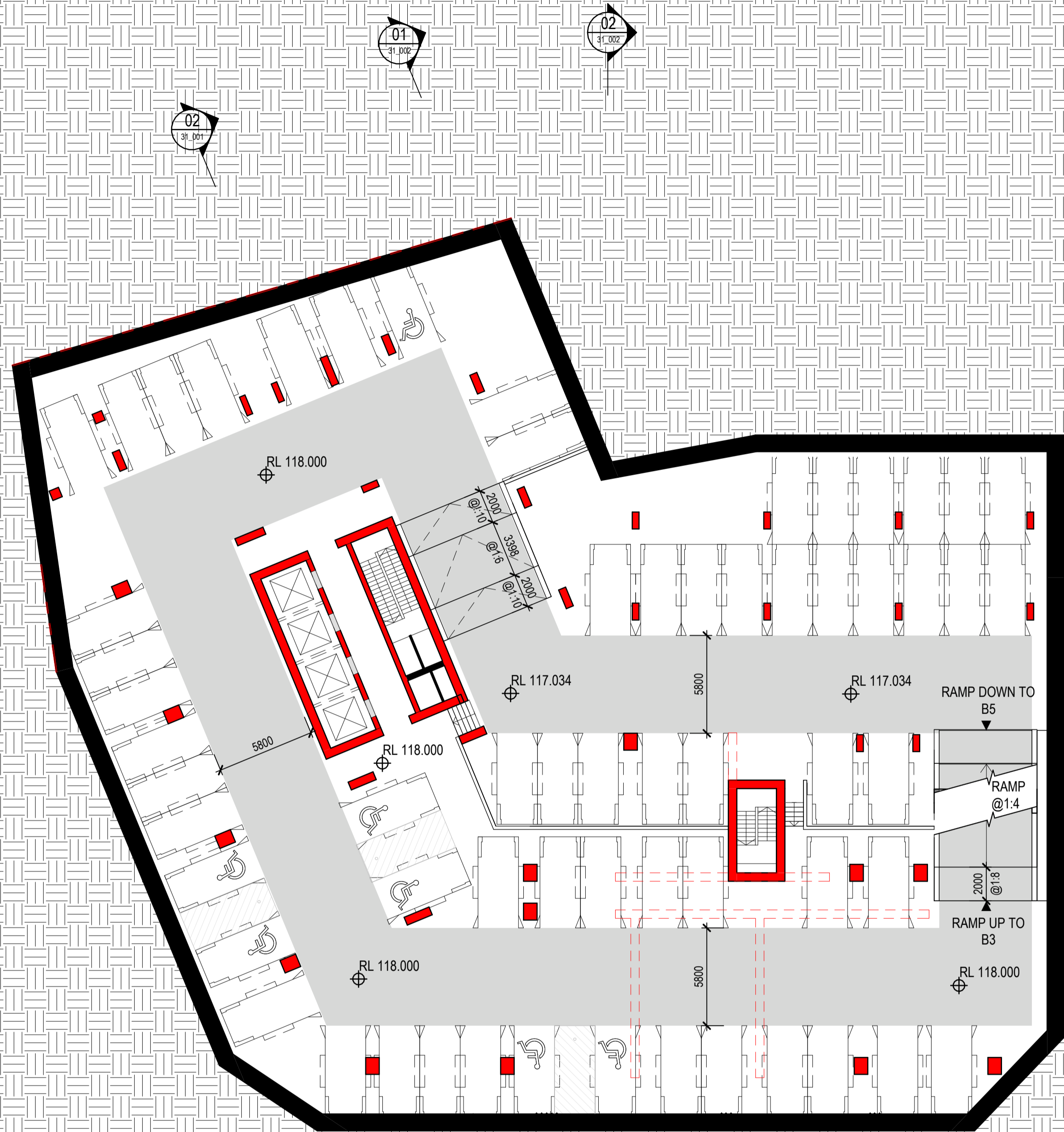
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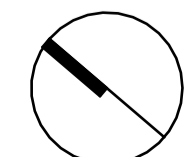
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BASEMENT 6	51	7	6	64
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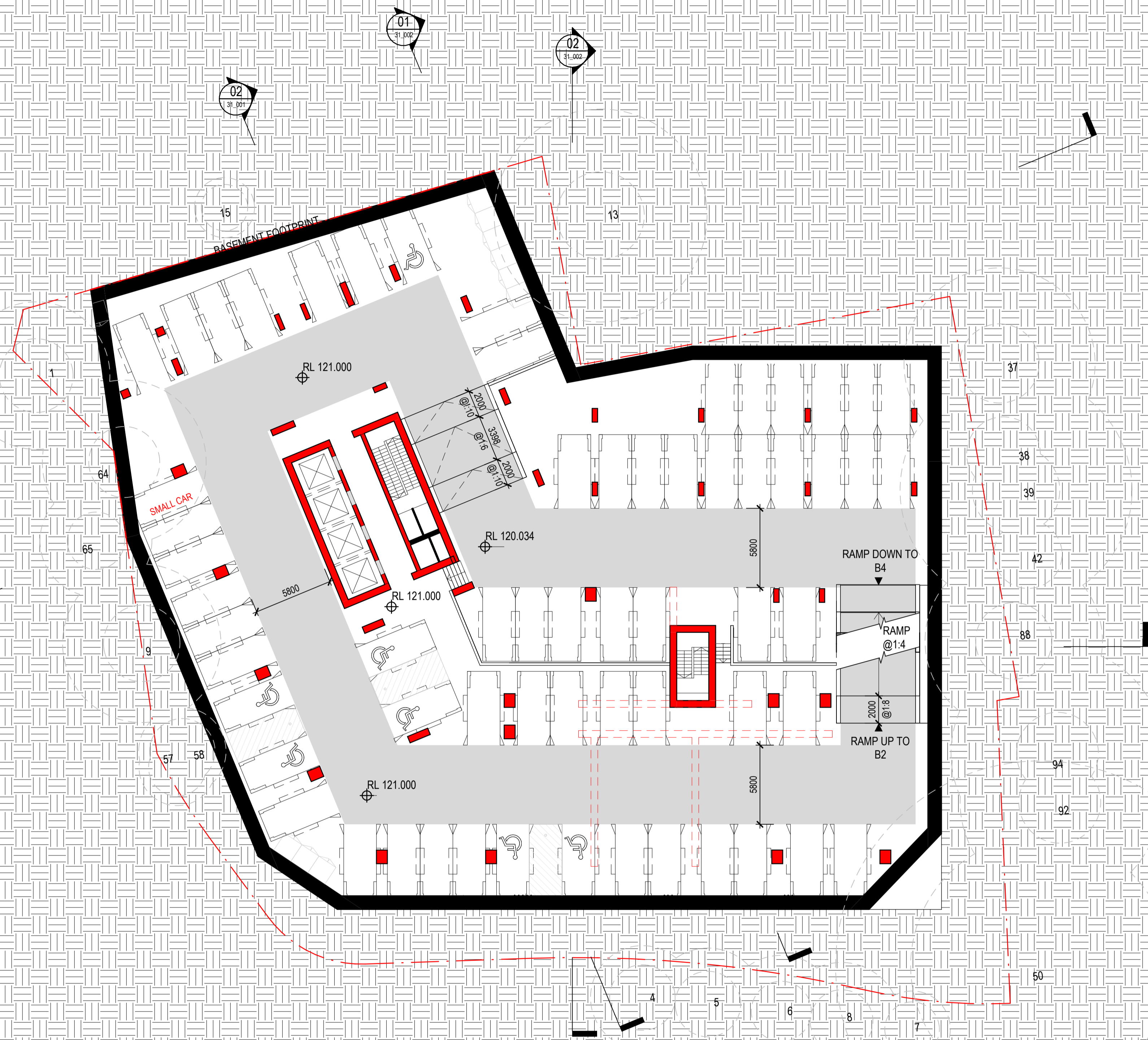


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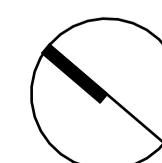


PARKING SCHEDULE

Level	Type			Total
	Standard	DDA	Tandem	
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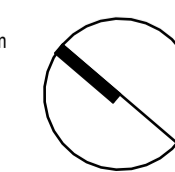
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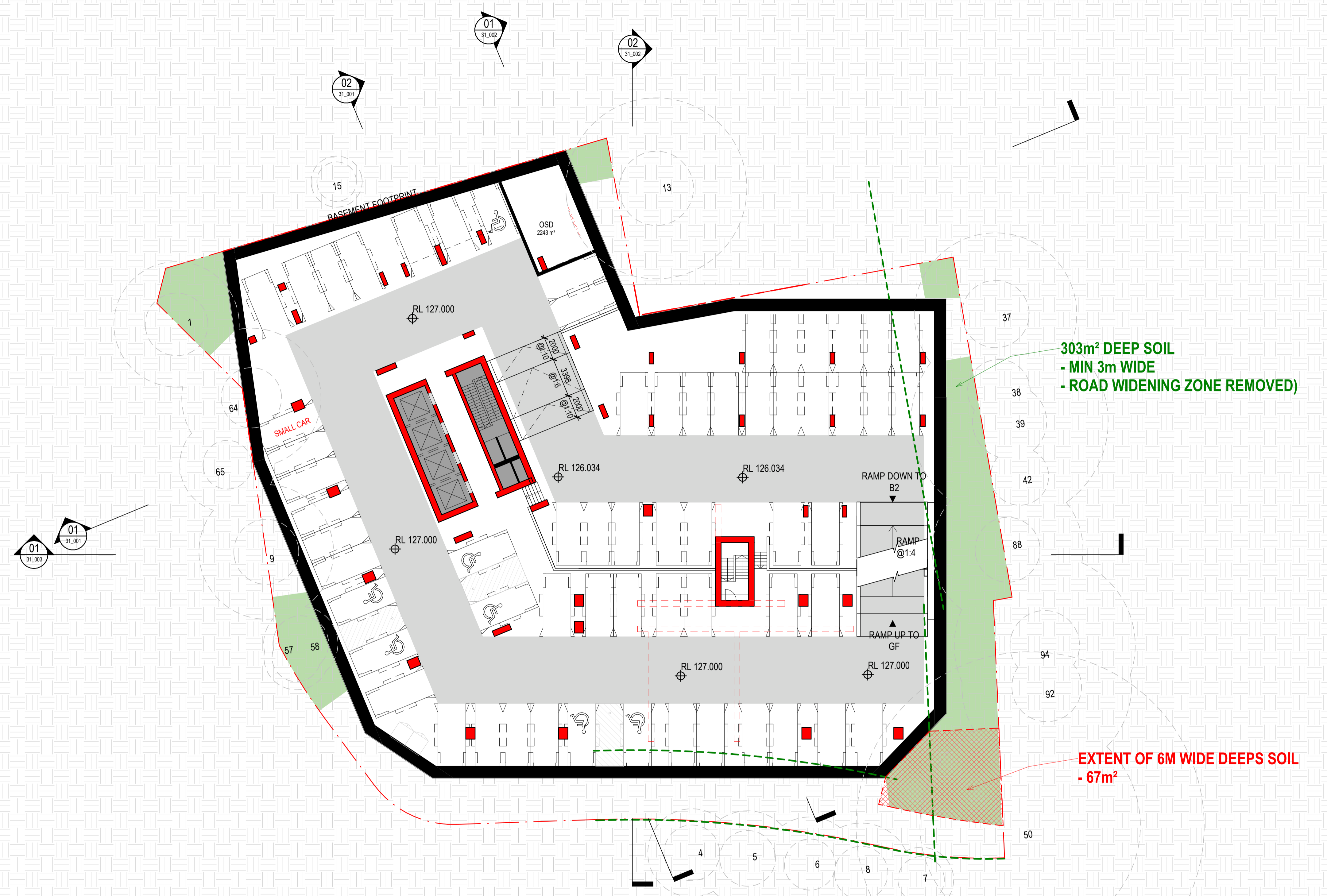
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BASEMENT 5	49	7	6	62
BASEMENT 6	51	7	6	64
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APARTMENT SCHEDULE - UNIT MIX

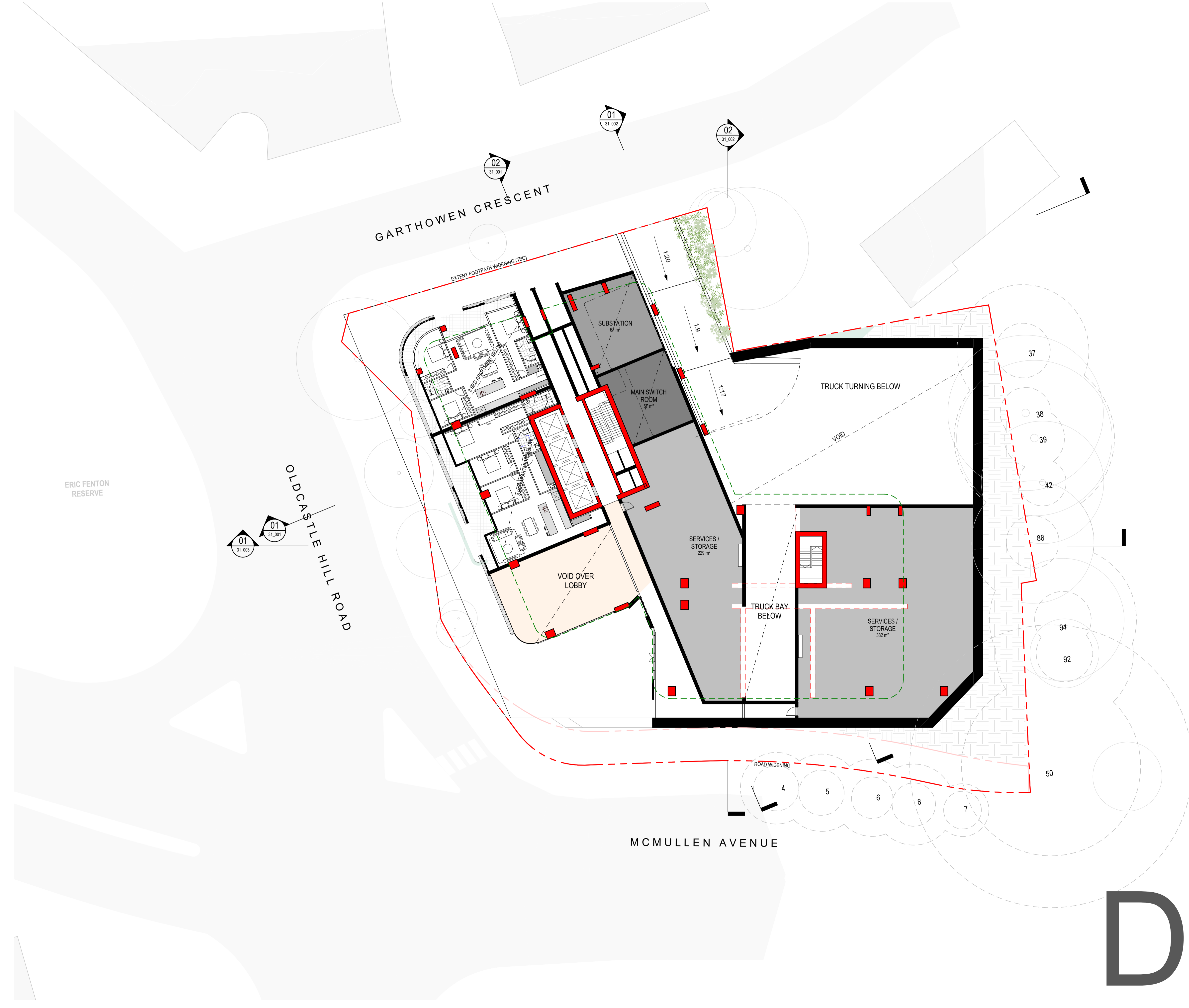
Unit Type	Count	Unit Mix
1 BED	90	24%
2 BED	194	52%
3 BED	83	22%
4 BED	4	1%
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APARTMENT SCHEDULE - UNIT MIX

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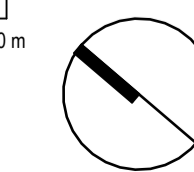
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B	FOR COORDINATION	04.11.2025

APARTMENT SCHEDULE - UNIT MIX

Unit Type	Count	Unit Mix
1 BED	90	24%
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[Status] PRELIMINARY

[Nom. Architect] Nicholas Bandounas /8499

[File] 20240027-AB-SK001-R24

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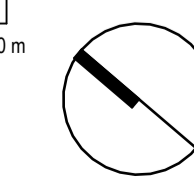
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B	FOR COORDINATION	04.11.2025

APARTMENT SCHEDULE - UNIT MIX

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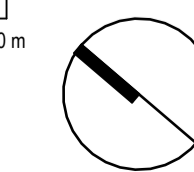


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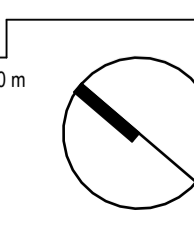
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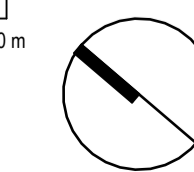
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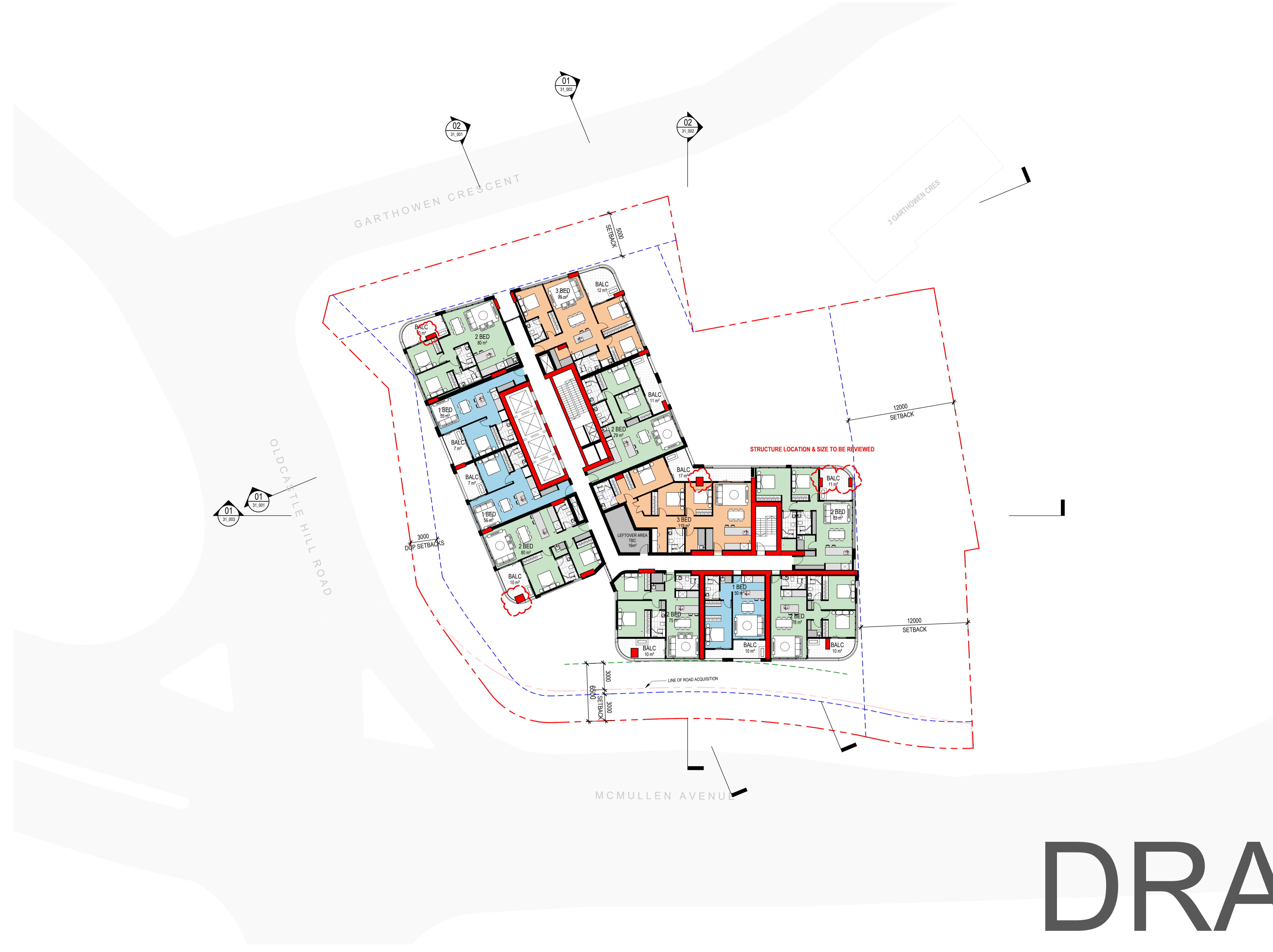


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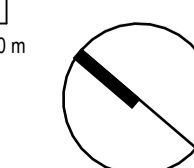


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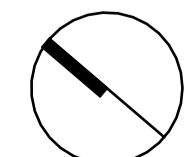


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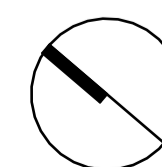
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[Status] PRELIMINARY

[Nom. Architect] Nicholas Bandounas /8499

[File] 20240027-AB-SK001-R24

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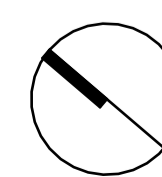
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B	FOR COORDINATION	04.11.2025

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[Status] PRELIMINARY

[Nom. Architect] Nicholas Bandounas /8499

[File] 20240027-AB-SK001-R24

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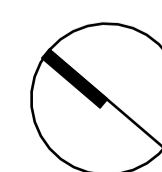
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B	FOR COORDINATION	04.11.2025

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DRAFT



[Status] PRELIMINARY

[Nom. Architect] Nicholas Bandounas /8499

[File] 20240027-AB-SK001-R24

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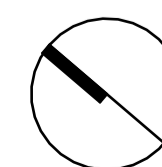
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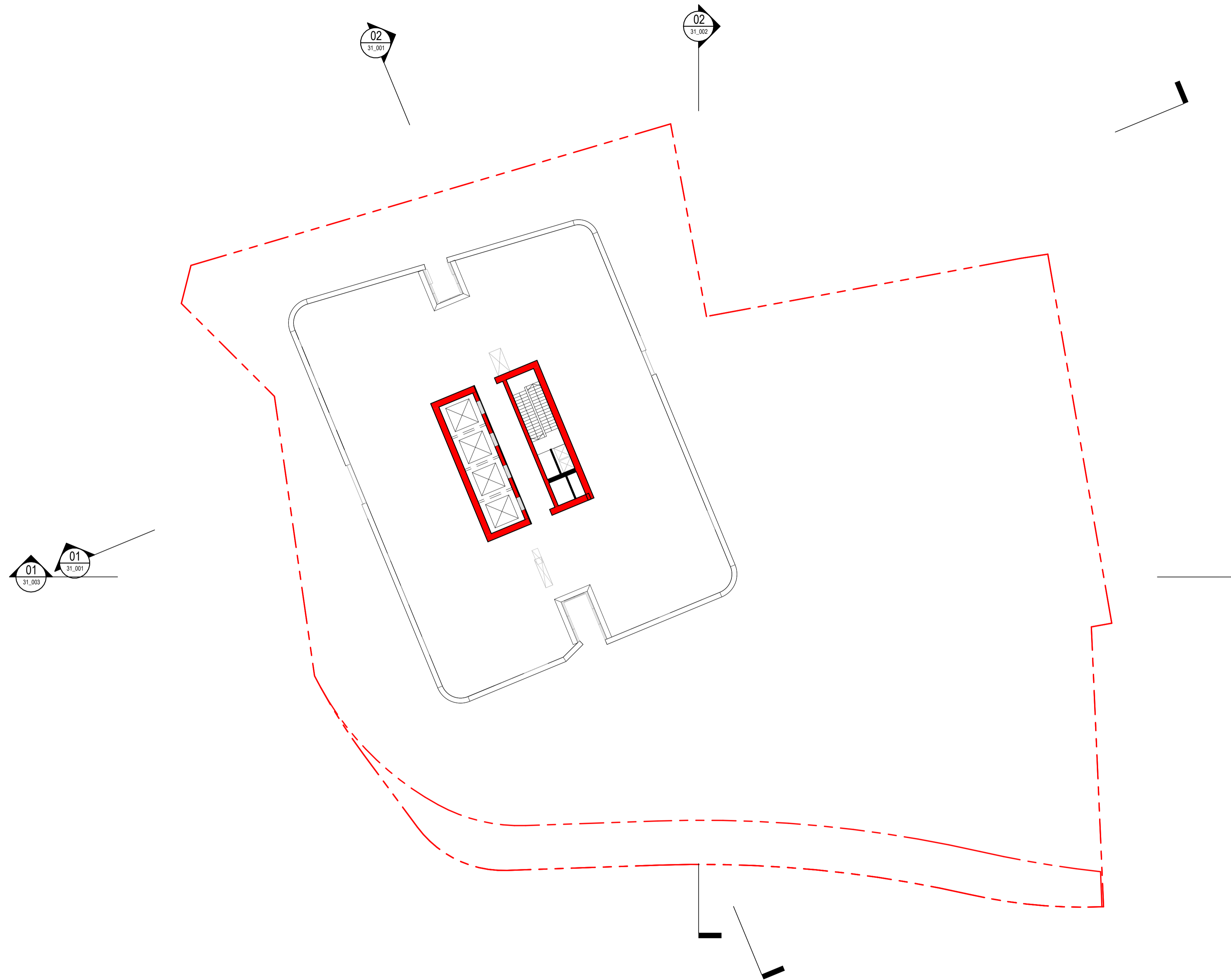


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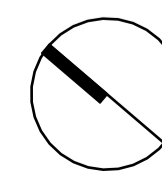


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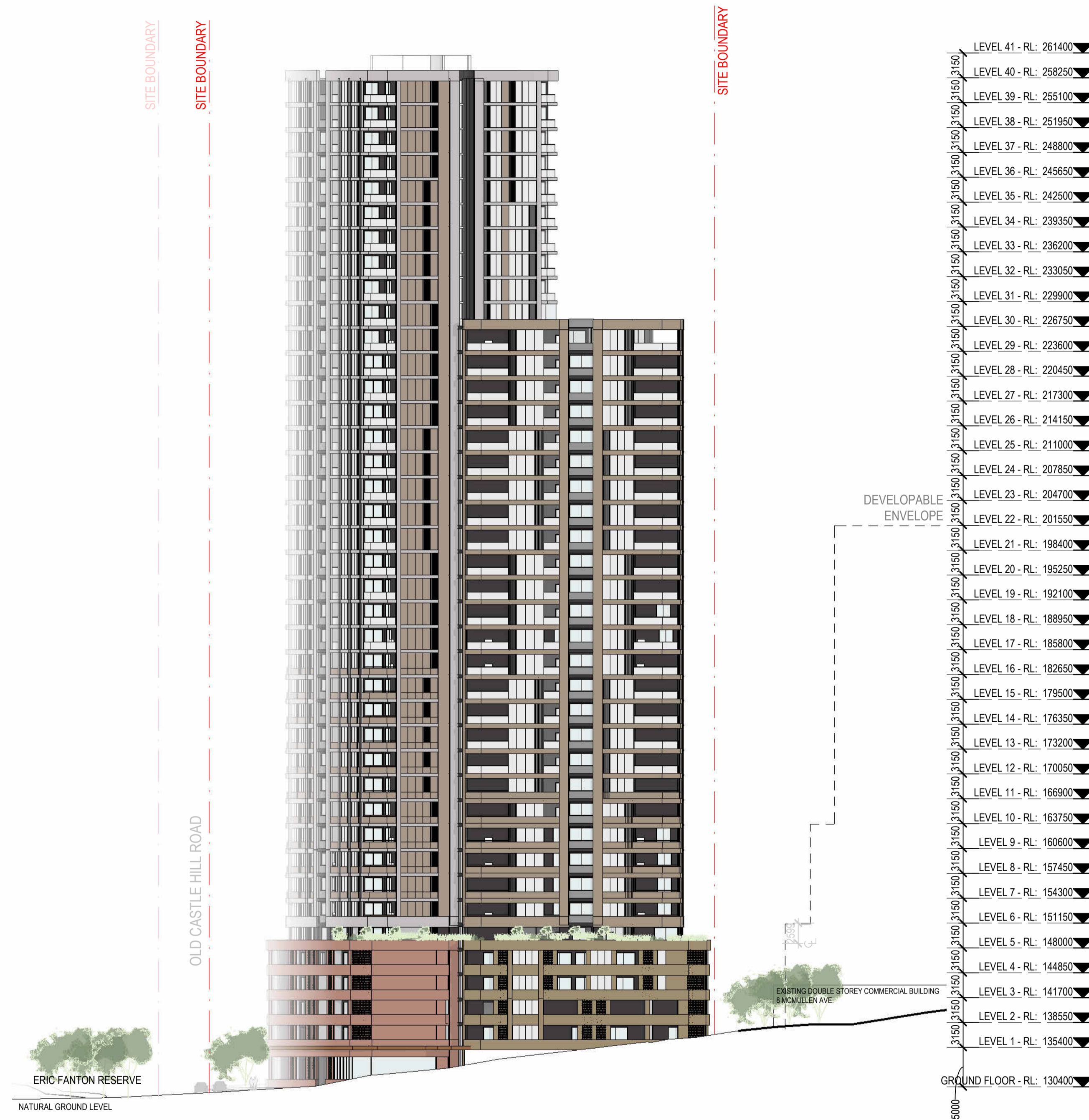


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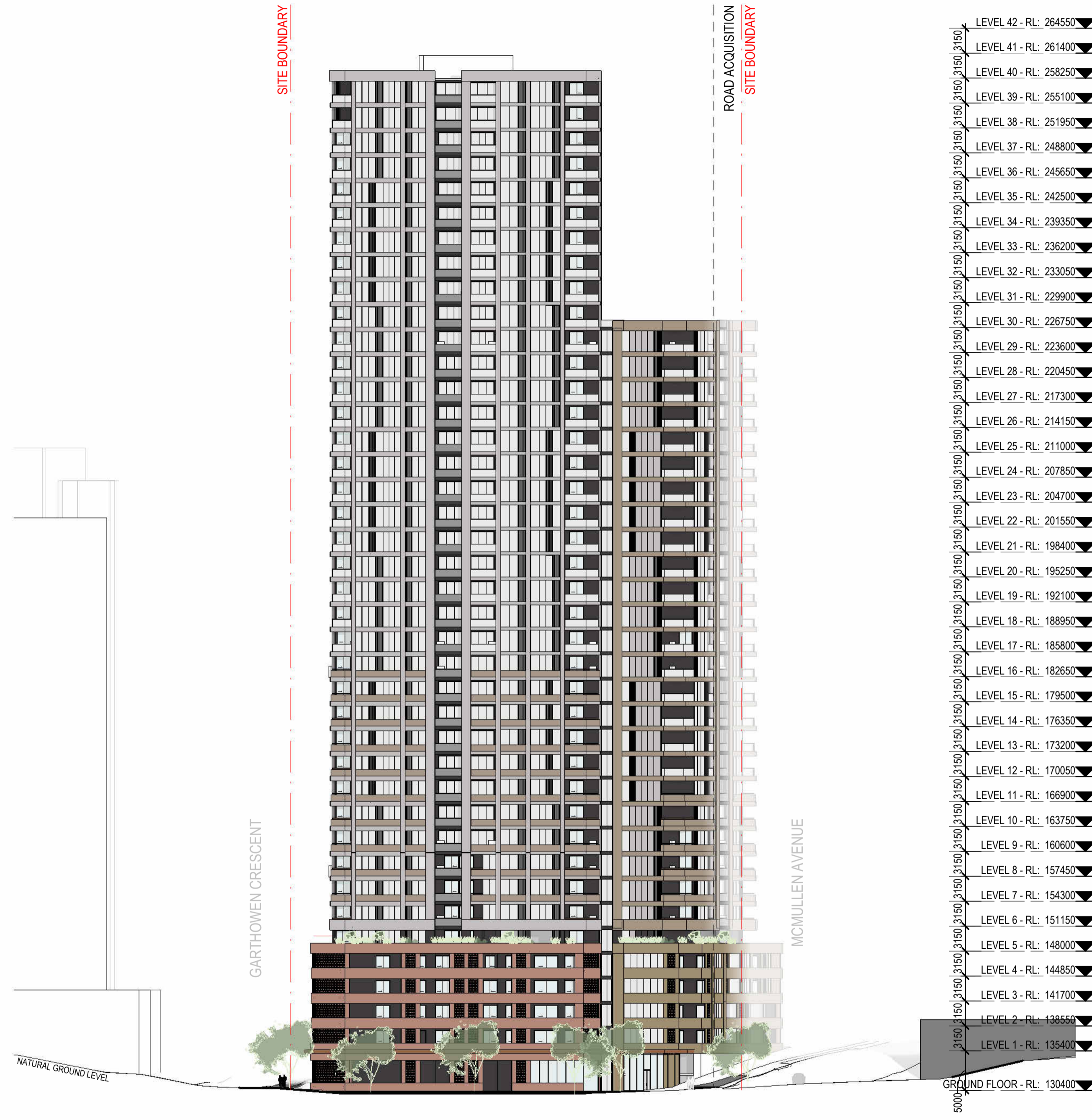


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1 EASTERN ELEVATION - DA
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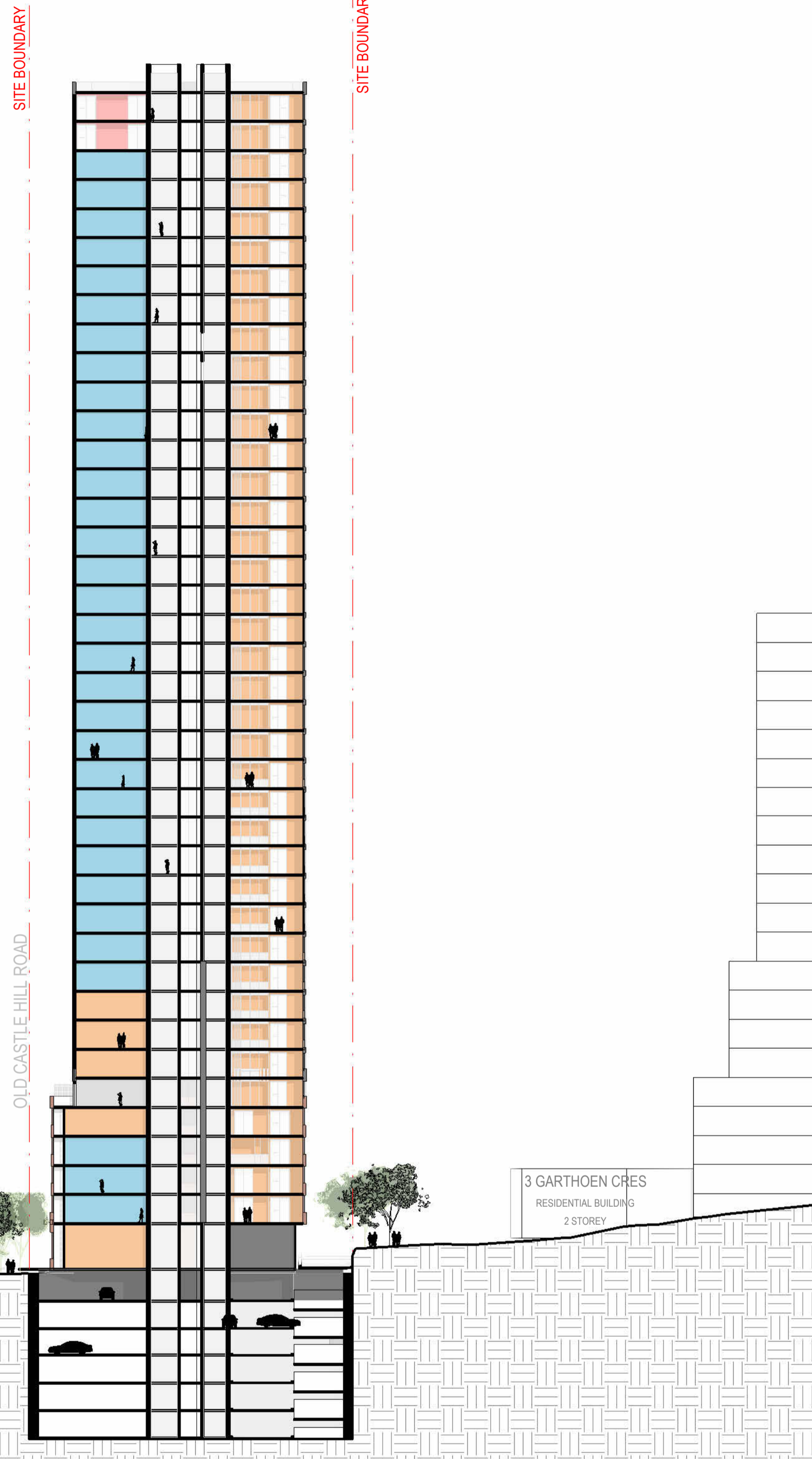


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- ▼ LEVEL 39 - RL: 255100
- ▼ LEVEL 38 - RL: 251950
- ▼ LEVEL 37 - RL: 248800
- ▼ LEVEL 36 - RL: 245650
- ▼ LEVEL 35 - RL: 242500
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- ▼ LEVEL 33 - RL: 236200
- ▼ LEVEL 32 - RL: 233050
- ▼ LEVEL 31 - RL: 229900
- ▼ LEVEL 30 - RL: 226750
- ▼ LEVEL 29 - RL: 223600
- ▼ LEVEL 28 - RL: 220450
- ▼ LEVEL 27 - RL: 217300
- ▼ LEVEL 26 - RL: 214150
- ▼ LEVEL 25 - RL: 211000
- ▼ LEVEL 24 - RL: 207850
- ▼ LEVEL 23 - RL: 204700
- ▼ LEVEL 22 - RL: 201550
- ▼ LEVEL 21 - RL: 198400
- ▼ LEVEL 20 - RL: 195250
- ▼ LEVEL 19 - RL: 192100
- ▼ LEVEL 18 - RL: 188950
- ▼ LEVEL 17 - RL: 185800
- ▼ LEVEL 16 - RL: 182650
- ▼ LEVEL 15 - RL: 179500
- ▼ LEVEL 14 - RL: 176350
- ▼ LEVEL 13 - RL: 173200
- ▼ LEVEL 12 - RL: 170050
- ▼ LEVEL 11 - RL: 166900
- ▼ LEVEL 10 - RL: 163750
- ▼ LEVEL 9 - RL: 160600
- ▼ LEVEL 8 - RL: 157450
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- ▼ LEVEL 4 - RL: 144850
- ▼ LEVEL 3 - RL: 141700
- ▼ LEVEL 2 - RL: 138550
- ▼ LEVEL 1 - RL: 135400
- ▼ GROUND FLOOR - RL: 130400
- ▼ BASEMENT 1 - RL: 127000
- ▼ BASEMENT 2 - RL: 124000
- ▼ BASEMENT 3 - RL: 121000
- ▼ BASEMENT 4 - RL: 118000
- ▼ BASEMENT 5 - RL: 115000
- ▼ BASEMENT 6 - RL: 112000



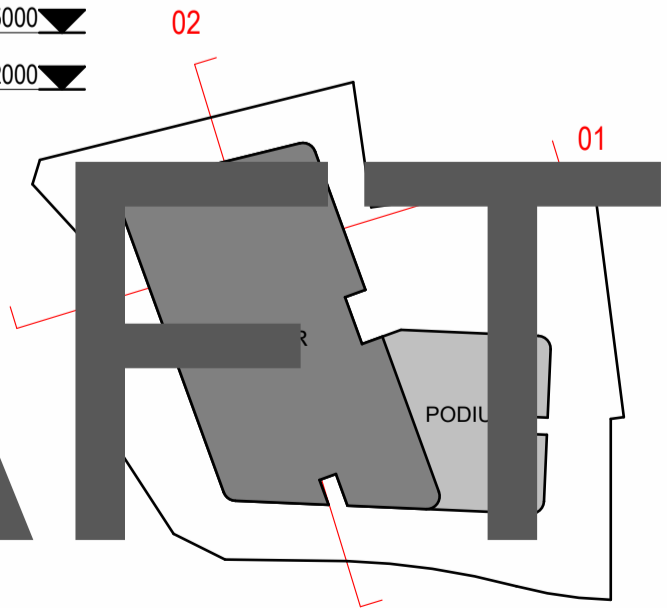
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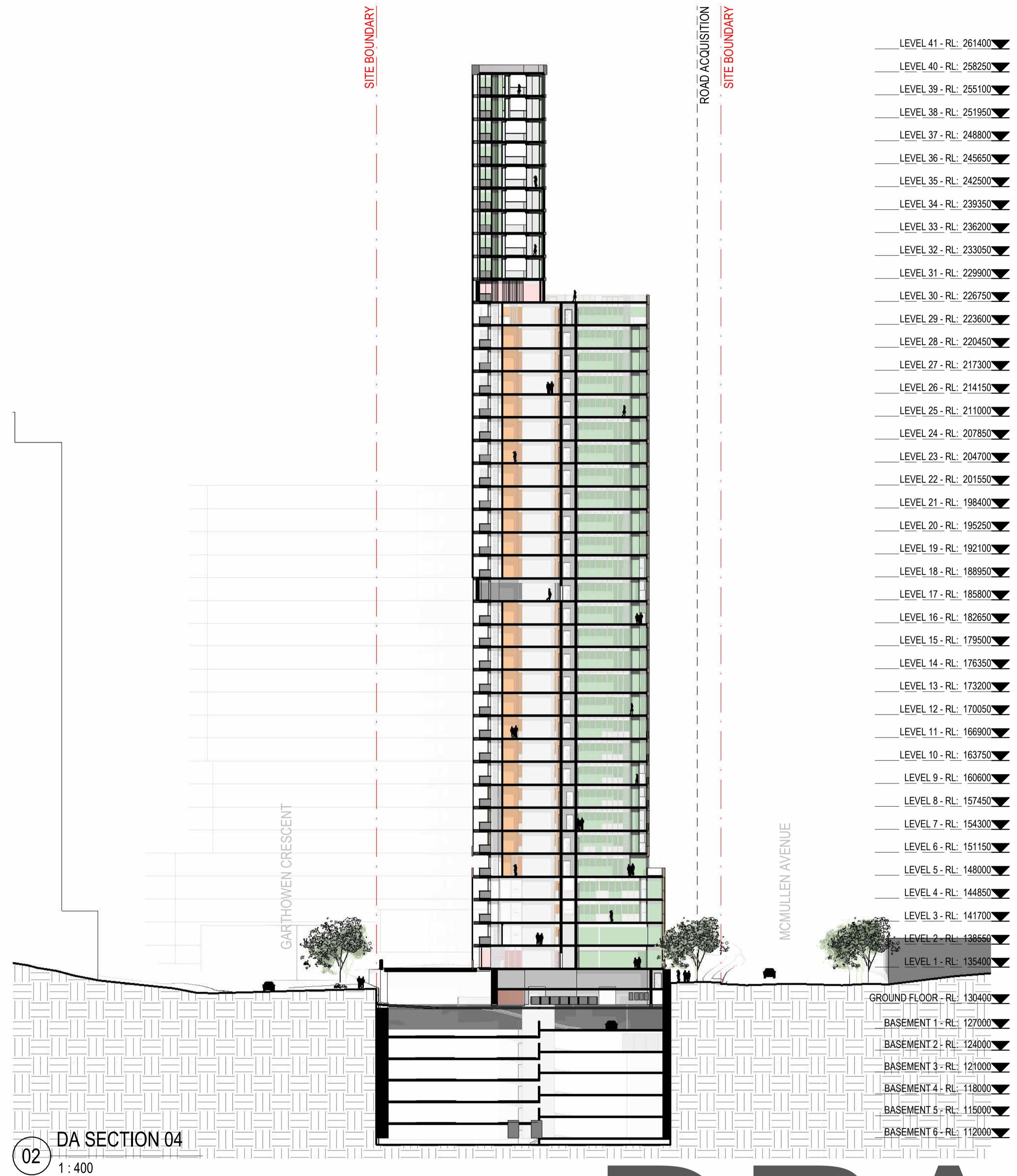


02 DA SECTION 02
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- ▼ LEVEL 38 - RL: 251950
- ▼ LEVEL 37 - RL: 248800
- ▼ LEVEL 36 - RL: 245650
- ▼ LEVEL 35 - RL: 242500
- ▼ LEVEL 34 - RL: 239350
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- ▼ LEVEL 2 - RL: 138550
- ▼ LEVEL 1 - RL: 135400
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- ▼ BASEMENT 2 - RL: 124000
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- ▼ BASEMENT 4 - RL: 118000
- ▼ BASEMENT 5 - RL: 115000
- ▼ BASEMENT 6 - RL: 112000

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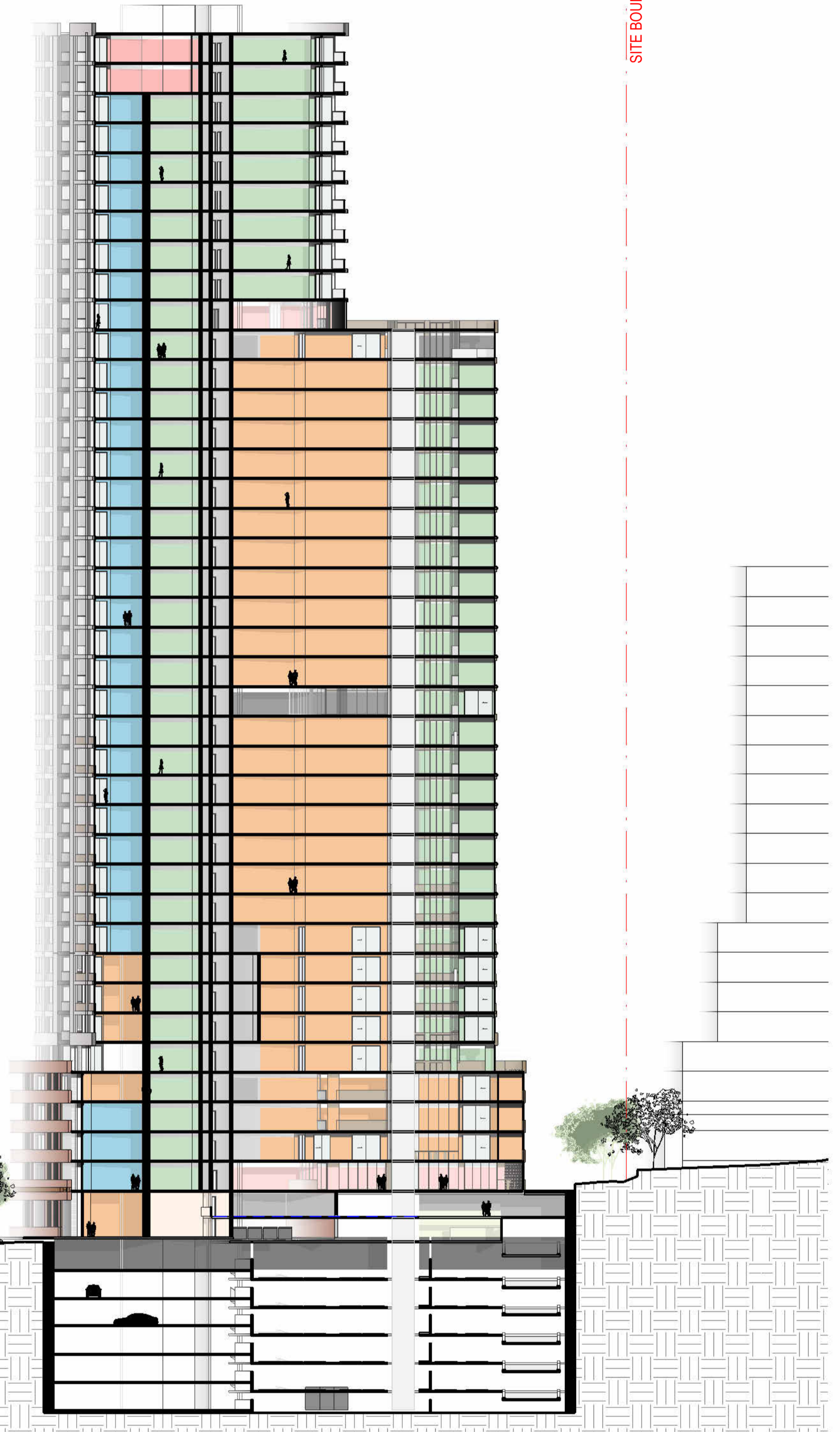
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-	PRELIMINARY	TBC
A	FOR COORDINATION	04.11.2025

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- ▼ LEVEL 33 - RL: 236200
- ▼ LEVEL 32 - RL: 233050
- ▼ LEVEL 31 - RL: 229900
- ▼ LEVEL 30 - RL: 226750
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- ▼ BASEMENT 4 - RL: 118000
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SITE BOUNDARY

SITE BOUNDARY

OLDCASTLE HILL RD



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DA SECTION 05

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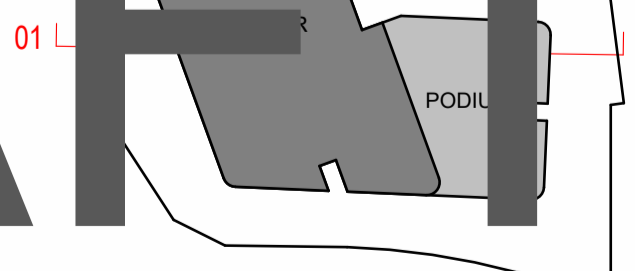


FIGURE 1: SITE PLAN