Design
for a better
future /

Rohrig Constructions

William Clarke College: Construction Environmental Management Plan

August 2024

Question today
Imagine tomorrow
Create for the future

William Clarke College: Construction Environmental Management Plan

Rohrig Constructions

WSP
Level 3, 51-55 Bolton St
Newcastle NSW 2300
PO Box 1162
Newcastle NSW 2300

Tel: +61 2 4929 8300
Fax: +61 2 4929 8382
wsp.com

This document may contain confidential and legally privileged information, neither of which are intended to be waived, and must be used only for its intended purpose. Any unauthorised copying, dissemination or use in any form or by any means other than by the addressee, is strictly prohibited. If you have received this document in error or by any means other than as authorised addressee, please notify us immediately and we will arrange for its return to us.

March 2023

DOCUMENT CONTROL CEMP

REV	DATE	DETAILS
A	30 August 2023	Draft for internal and client review
0	6 September 2023	Issue
1	12 September 2024	Reissue – amended contamination and unexpected finds procedure
2	24 October 2024	Revision based on DPHI feedback
3	6 February 2025	Revision based on audit – cross referencing issues
4	4 August 2025	Revision – amended carpark plan
5	7 August 2025	Revision – amendment to document control pages
6	31 October 2025	Revision – review period – no adjustments made
7	27 January 2026	Revision – review period – no adjustments made
8	21 April 2026	Revision – review period – no adjustments made

	NAME	DATE	SIGNATURE
Prepared by:	Stuart Longman	28/08/2024	
Reviewed by:	Lousie MacDonald	30/08/2024	
Approved by:	Stuart Longman	06/02/2025	
Reviewed by:	Brad Blanshard	06/02/2025	

Reviewed by:	Brad Blanshard	06/05/2025	
Reviewed by:	Andries Van Der Walt	06/05/2025	
Reviewed by:	Jason Li	06/05/2025	J.L
Reviewed by:	Michael Wilson	06/05/2025	M.W
Reviewed by:	Ashley Holmes	06/05/2025	A.H
Reviewed by:	Joshua Gosling	06/05/2025	J.G
Reviewed by:	Asher Zines	06/05/2025	A.Z

Reviewed by:	Brad Blanshard	04/08/2025	
Reviewed by:	Andries Van Der Walt	04/08/2025	
Reviewed by:	Jason Li	04/08/2025	J.L
Reviewed by:	Michael Wilson	04/08/2025	M.W
Reviewed by:	Ashley Holmes	04/08/2025	A.H

Reviewed by:	Joshua Gosling	04/08/2025	J.G
Reviewed by:	Asher Zines	04/08/2025	A.Z
Reviewed by:	Michael Maguire	04/08/2025	M.M
Reviewed by:	Kian Hunter	04/08/2025	K.H
Reviewed by:	Luke Krawchuk	04/08/2025	L.W

Reviewed by:	Brad Blanshard	31/10/2025	Brad Blanshard
Reviewed by:	Andries Van Der Walt	31/10/2025	
Reviewed by:	Jason Li	31/10/2025	J.L
Reviewed by:	Michael Wilson	31/10/2025	M.W
Reviewed by:	Ashley Holmes	31/10/2025	A.H
Reviewed by:	Joshua Gosling	31/10/2025	J.G
Reviewed by:	Asher Zines	31/10/2025	A.Z
Reviewed by:	Michael Maguire	31/10/2025	M.M
Reviewed by:	Kian Hunter	31/10/2025	K.H
Reviewed by:	Luke Krawchuk	31/10/2025	L.W

Reviewed by:	Andries Van Der Walt	27/01/2026	
Reviewed by:	James Watson	27/01/2026	J.W
Reviewed by:	Jason Li	27/01/2026	J.L
Reviewed by:	Michael Wilson	27/01/2026	M.W
Reviewed by:	Ashley Holmes	27/01/2026	A.H
Reviewed by:	Joshua Gosling	27/01/2026	J.G
Reviewed by:	Asher Zines	27/01/2026	A.Z
Reviewed by:	Michael Maguire	27/01/2026	M.M
Reviewed by:	Luke Krawchuk	27/01/2026	L.W

Reviewed by:	Andries Van Der Walt	21/04/2026	
Reviewed by:	James Watson	21/04/2026	J.W
Reviewed by:	Jason Li	21/04/2026	J.L
Reviewed by:	Michael Wilson	21/04/2026	M.W
Reviewed by:	Ashley Holmes	21/04/2026	A.H
Reviewed by:	Joshua Gosling	21/04/2026	J.G
Reviewed by:	Asher Zines	21/04/2026	A.Z
Reviewed by:	Luke Krawchuk	21/04/2026	L.W

Table of contents

1 Introduction 1
1.1 Project description 1
1.2 Project scope 1
1.3 Project location 2
1.4 Purpose of the CEMP 2
1.5 CEMP approval 3
1.6 Relation to Construction Management Plan 3
2 Planning and Approvals 4
2.1 Project Approval 4
2.2 Environmental Impact Statement 4
3 Project requirements 5
3.1 Construction scope 5
3.2 Construction timing 5
3.2.1 CEMP approval 5
3.2.2 Timing of works 5
3.2.3 Duration of works 5
3.2.4 Hours of work 5
3.2.5 Deliveries and traffic restrictions 6
3.2.6 Parking restrictions 6
3.2.7 Pedestrian restrictions 6
3.2.8 High impact noise works timing restrictions 6
4 Communication 7
4.1 Notification of commencement 7
4.2 Community communication 7
4.3 Induction 7
4.4 Project Contacts 8
4.4.1 Out of hours contacts 8
4.5 Roles and responsibilities 8
4.6 Toolbox talks/pre-starts 10
4.7 Site monitoring and record keeping 10
4.7.1 Site Inspection Checklist 10
4.7.2 Project Mangers Inspection Checklist 10
4.7.3 Site Monitoring Schedule 11
4.8 Complaints 11

4.9 Auditing 11

5 Site setup 12

5.1.1 Site layout 12
5.1.2 Project site hoarding 12
5.1.3 Project site fencing 12
5.1.4 Project site signage 13
5.1.5 Housekeeping / project site amenity 13
5.1.6 Site vehicles 13
5.1.7 Driver code of conduct 13
5.1.8 Avoiding obstruction to the public 14

6 Environmental framework 15

6.1 Environmental Policy 15

6.2 Environmental Management System 16

6.3 Project environmental expectations 17

6.4 General Responsibilities 17

7 Project environmental management 18

7.1 Outdoor Lighting 18

7.2 Plant and equipment 18

7.3 Refuelling 18

7.4 Spill mitigation 18

7.5 Chemical storage and handling 18

7.6 Traffic management and project site access 19

7.7 Construction noise and vibration 19

7.8 Erosion and sediment control 19

7.9 Dust and odour 19

7.9.1 Odour 20

7.10 Heritage 20

7.11 Vegetation protection 20

7.12 Waste management 21

7.12.1 Waste streams 21
7.12.2 Disposal contractors 22

7.13 Imported materials 22

7.14 Contamination 22

7.14.1 Soil 22

7.14.2 Preliminary Waste Classification of Fill 22
7.14.3 Groundwater 22

8 Contingency Plans 24

8.1 Environmental Incidents 24

8.1.1 Incident response and investigation 24
8.1.2 Spill management and response 25
8.1.3 Incident notification to NSW Planning Secretary 25
8.1.4 EPA Reporting 26

8.2 Unexpected Finds Protocols 26

8.2.1 Unexpected finds – Aboriginal heritage 26
8.2.2 Unexpected finds – skeletal remains 26
8.2.3 Unexpected Finds Protocol – Historic Heritage 27
8.2.4 Unexpected finds - contamination 27
8.2.5 Wet weather 28
8.2.6 Flood management 28

8.3 CEMP Review and update 28

8.4 Audit 29

9 Limitations 30

9.1 Permitted purpose 30

9.2 Qualifications and assumptions 30

9.3 Use and reliance 30

9.4 Disclaimer 31

List of Appendices

A. Noise and Vibration Management Plan
B. Traffic Management Plan
C. Erosion and Sediment Control plan
D. Community Engagement Strategy
E. Emergency Management Plans
F. Site layout

1 Introduction

1.1 Project description

The proposed construction works involves the construction of Stage 1 works at William Clarke College in Kellyville NSW. This stage of work is part of an approved masterplan for the school to meet the demands of the growing local community.

Stage 1 works have been approved by the Minister for Planning and Public Spaces (NSW) under section 4.38 of the Environmental Planning and Assessment Act (1979).

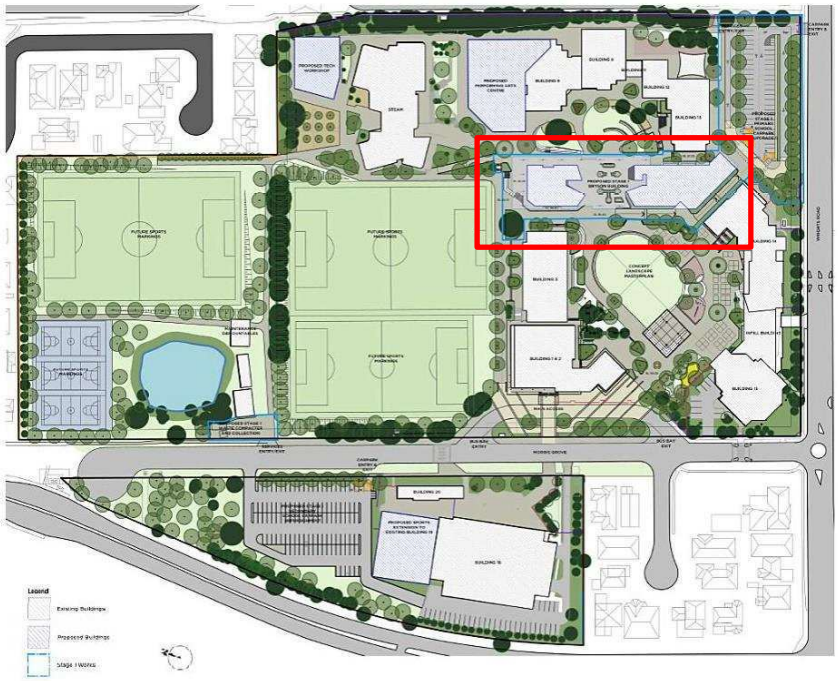
Rohrig will be undertaking the construction of the Bryson building as part of these approved stage 1 works.

1.2 Project scope

Stage 1 construction works include:

- Site preparation, including earthworks and civil works for the Bryson Building
- Construction of the Bryson Building for use as classrooms, staff rooms, library and ancillary teaching spaces, to be located in the centre of the site
- Landscaping ancillary to Bryson Building including tree planting.

Figure 1-1 William Clarke College Masterplan (Extract from EIS) – Stage 1 outlined in red



1.3 Project location

The project site is within a school: William Clarke College, located at 10 Morris Grove, Kellyville NSW and is legally described as Lot 10 in DP 1169003.

Figure 1-2 location of William Clarke College in Kellyville NSW (Source EIS 2022)



1.4 Purpose of the CEMP

The purpose of the Construction Environmental Management Plan (CEMP) is to meet the criteria as defined within the approved State Significant Development (SSD-35715221). As per Schedule 3 Part C of the conditions of consent, clause C14 states the requirement for preparation of a Construction Environmental Management Plan (CEMP) as per below.

The CEMP must be generally consistent with the document construction management plan dated 26 September 2022 prepared by Rohrig and include, but not be limited to:

(a)construction details:

(i) hours of work

(ii) 24-hour contact details of site manager

(iii) management of dust and odour to protect the amenity of the neighbourhood;

(iv) groundwater management plan including measures to prevent groundwater contamination

(v) External lighting in compliance with as 4282-2019 control of the obtrusive effects of outdoor lighting

(vi) community consultation and complaints handling as set out in the community communication strategy required by schedule 3 condition c8

(vii) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and

(viii) flood emergency procedures during construction works

(b) construction traffic and pedestrian management sub-plan (as per schedule 3 condition c16)

(c) construction noise and vibration management sub-plan (as per schedule 3 condition c17)

(d) construction soil and water management sub-plan (as per schedule 3 condition c18)

(e) an unexpected finds protocol for contamination and associated communications procedure

(f) an unexpected finds protocol for aboriginal and non-aboriginal heritage and associated communications procedure

(g) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site.

An Environmental Impact Statement (EIS) was prepared for this project DFP Planning Pty Ltd (24th October 2022). The EIS and subsequent submission report identified environmental aspects and impacts and specified mitigation measures have been included in this CEMP.

The purpose of this CEMP is to detail the specific measures to be implemented during the construction phase of this project in order to manage and mitigate environmental risk.

This CEMP has been prepared in accordance with the requirements as set out in the project Development Consent, the approved EIS and *Environmental Management Plan Guideline for Infrastructure Projects* (NSW Planning Portal, April 2020).

This CEMP has been prepared in line with the Rohrig Construction management plan dated 26 September 2022.

1.5 CEMP approval

The project construction works must not commence until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.

1.6 Relation to Construction Management Plan

This CEMP references the current scope of works for the construction of the Bryson Building. . As part of the project EIS Appendix FF, Rohrig Constructions prepared a Construction Management Plan (26th September 2022) Since the development of this plan the scope of works has changed, with the changes detailed in the table below: The remaining methodology as set out in the CMP 2022 remains in place and this CEMP is consistent with that plan.

CMP 2022	CEMP 2024	RATIONALE
3. Staging of works. *Ideally, construction would commence upon completion of HSC exams, whereby senior student that drive to the School would no longer attend on a daily basis and carparking in the student carpark*	Works to commence September 2024	Construction of new waste compound, primary school carpark is no longer included in scope of works. The potential impact of student parking no longer applies. All site vehicles are parked in within the construction site and not in school carparks.

2 Planning and Approvals

2.1 Project Approval

This project has been approved via Development Consent (SSD-35715221) under Section 4.38 of the Environmental Planning and Assessment Act 1979 by the NSW Minister for Planning and Public Spaces. The conditions of consent as have been incorporated into this CEMP and associated sub plans and must be adhered to during construction of this project.

Refer to Appendix F for detail on where the relevant conditions of consent (construction phase) are addressed in this CEMP .

2.2 Environmental Impact Statement

An EIS was prepared by DFP Planning Consultants (12th October 2022) for the development to fully assess possible all matters affecting or likely to affect the environment during construction and specifies required mitigation measures. The mitigation measures have been updated during the responses to submission and have been incorporated into the Amended Mitigation Measures (for SSD-35715221) prepared by DPF Planning Consultants (June 2023).

The amended mitigation measures have been incorporated into this CEMP and associate sub plans and must be complied with during construction of this project.

3 Project requirements

3.1 Construction scope

The works can be summarised as the below phases of construction

1. Site establishment and preliminary works
    a. Site hoarding, access, signage and fencing and temporary car parking
    b. Environmental controls installation
2. Bryson Building construction
    a. Vegetation works clearing, stripping and stockpile
    b. Groundworks and construction of new building
    c. Construction of footings and slab (north and south)
    d. Structural concrete and steel works
    e. Cladding and roofing of new building
    f. External works to the main building concurrent with
    g. Internal building services and fit out
    h. Defects rectification and commissioning
    i. Completion works and disestablishment

3.2 Construction timing

3.2.1 CEMP approval

The project construction works must not commence until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.

3.2.2 Timing of works

The works are proposed to commence in mid-September 2024.

The works will be co-ordinated with the school throughout construction to reduce impacts on the school timetable and any significant events that will be hosted by the school.

Bell times will remain unchanged unless determined by the school.

3.2.3 Duration of works

Construction of the Bryson Building is expected to take 14-16 months with completion estimated at late 2025.

3.2.4 Hours of work

Construction including deliveries of materials to and from the site may only be carried out between the following hours:

- 7am and 6pm, Mondays to Fridays
- 8am to 1pm on Saturdays.
- No work may be carried out on Sundays or public holidays

3.2.4.1 Out of hours work

Construction activities may only be undertaken outside of the hours specified above if:

- Required by the Police or a public authority for the delivery of vehicles, plant or materials
- It is an emergency to avoid the loss of life, damage to property or to prevent environmental harm
- The works are inaudible at the nearest sensitive receivers
- A variation is approved in advance in writing by the Planning Secretary if suitable justification is provided

3.2.5 Deliveries and traffic restrictions

In order to minimise the possibility of conflict with parents and students during school drop-off and pickup times, construction vehicle access will be restricted during school terms at the following times.

- 7:45am – 8:45am Monday – Friday
- 2:45pm – 3:45pm Monday – Friday

Refer to the project specific Traffic management plan include in Appendix B of this CEMP for further detail.

3.2.6 Parking restrictions

Refer to the project specific Traffic management plan included in Appendix B of this CEMP for details.

3.2.7 Pedestrian restrictions

Refer to the project specific Traffic management plan included in Appendix B of this CEMP for details.

3.2.8 High impact noise works timing restrictions

Refer to the project specific Noise and vibration management plan included in Appendix A of this CEMP for details.

Rock breaking, rock hammering, sheet piling, pile driving, and similar high impact noisy activities is to be minimised where feasible. The development consent indicates that these noisy activities may only be carried out between the following hours:

- 9am to 12pm, Monday to Friday
- 2pm to 5pm Monday to Friday
- 9am to 12pm, Saturday.

The works will be co-ordinated with the school to reduce noise impacts on the school operations throughout the project.

4 Communication

4.1 Notification of commencement

At least 48 hours prior to commencement of construction works, the Planning Secretary is to be notified in writing of the date of the intended commencement of construction.

Additionally, the Planning Secretary is to be notified in writing at least 48 hours before the commencement of each stage of works, of the date of commencement and the development to be carried out in that stage.

4.2 Community communication

At least 2 weeks prior to commencement of construction a Community Communication Strategy is to be submitted to the Planning Secretary for information. Refer to Appendix D of this CEMP for details.

The Community Communication Strategy details how communication will occur between the Rohrig and affected stakeholders including:

- Council
- The school community
- Affected residential neighbours, businesses and sensitive receivers

This communication is required before and during construction of the project and for a minimum of 12 months following the completion of construction.

This strategy:

- Identifies who is to be notified and consulted during the construction phases
- Sets out procedures for the regular distribution of information about the construction works
- Sets out procedures through which the community can enquire or provide feedback to Rohrig
- Sets out how Rohrig will respond to enquiries or feedback from the community
- Identifies how issues and complaints will be managed and resolved in relation to construction

Communication to stakeholders will include any specific traffic, parking, pedestrian, noise and vibration, visual amenity, or other environmental aspects of the construction.

4.3 Induction

Prior to undertaking any work at the project site, all employees and subcontractors will attend an induction session which will incorporate training on the procedures and controls measures associated with this plan.

The induction process for all employees and subcontractors will include a section on environmental awareness, and cover as a minimum:

- Company Environment Policy
- General environmental responsibilities and project site expectations
- Site emergency response

- Limits of clearing and NO-GO areas
- Waste management and minimisation requirements
- Hazardous materials storage / handling
- Refuelling procedures and spill response
- Access to the project site and vehicle access restrictions/requirements for parking
- Timing restrictions for deliveries
- Site specific environmental controls
- Dust and emissions mitigation requirements
- Noise and vibration requirements
- Hours of work and rules on working in a school environment
- Complaints handling
- Unexpected finds and emergency procedure
- Locations of project office, lunchrooms, change rooms, ablutions, spill kit and first aid

4.4 Project Contacts

The key project contacts for all environmental matters are included below table

Role	Contact name	Contact detail
General Manager (Rohrig office)	David Campbell	02 9695 1668
Project Manager	Brad Blanshard	0435 755 307
Site manager	Andries van der Walt	0437 017 720

4.4.1 Out of hours contacts

The site manager as listed in the above table is the defined out of hours contact for this project. The out of hours contact number is to be displayed on the site signage for the duration of works.

4.5 Roles and responsibilities

Rohrig will have overall responsibility for implementing and managing this CEMP. All on-site personnel (employees and sub-contractors) must adhere to the requirements of this plan. Key personnel and associated responsibilities for this project are presented in Table 4-1

Table 4-1 Roles and responsibilities

Personnel	Roles and responsibilty
Rohrig Director	The Director has overall responsibility for safety for the company and for management of the health and safety for Rohrig personnel. Specific WHSE responsibilities include:

	— Ensuring compliance with the requirements of the Work Health and Safety Legislation (WH&S Act 2011 and WH&S Regulations 2011), Environmental legislation, relevant Codes of Practice, standards including Australian Standards, and Industry best practice. — Implementation of the company's Health, Safety and Environmental Policy and Procedures. — Assigning safety and environmental responsibilities to nominated personnel of Rohrig — Ensuring adequate and sufficient resources are provided to implement the health, safety and environmental management system. Resources may include physical, technical and financial. — Supporting project/workplace personnel to implement the health, safety and environmental management system. — Regularly reviewing the company's health, safety and environmental management system for improvement opportunities. — Initiating external audits and reviews of the Rohrig ' s health, safety and environmental management system. — Ensuring appropriate health, safety, environmental and technical training is provided where required that will enable personnel to work in a safe, healthy and productive way. — Actively participate in operational and management meetings while promoting health, safety and environmental sustainability as a priority.
Project manager	This position is responsible for environmental management for the project including implementation of this management plan and: — Application of the Hierarchy of Risk Controls to eliminate, or if elimination is not practicable, to minimise risks in all design, procurement, manufacturing, fabrication, construction, administration and associated activities — Communication with stakeholders to minimise risks. — Determination of requirements for and implementation of training and education activities. — Promotion of best practices through leadership and example. — Provision and maintenance of safe and environmentally friendly plant, equipment and substances. Review of reports and inspections, and implementation of recommendations. — Coordination of incident investigations and reporting to relevant persons and authorities. — Coordination of WHSE meetings and programmes. — Overall responsibility for environmental management on the project site. — Responsibility for management and compliance of all working on-site.
Site supervisor	This position is responsible for environemtnal management implementartion for this project and the implementation of this management plan. As well as: — Observation of and adherence to all rules and regulations.

	— Ensuring that all work activities are carried out in a manner which is healthy, safe, and environmentally sound. — Planning to carry out all work safely, taking into account any interfacing with other work activities. — Determination of requirements for and implementation of training activities within the Rohrig workforce. — Conducting of workplace inspections and actioning of reports. — Participating in meetings and programmed training. — Investigation of hazard reports, and implementation of corrective actions. — Conduct workplace inductions, toolbox meetings, and team meetings (including pre-start meetings). — Participation in incident investigations. — Promotion of good practices through leadership and example at every opportunity. — Conduct inspections of workplaces to ensure thatcontrol measures are implemented and effective, and — Conduct of other duties as directed by the Operations Manager. Ensure this plan is implemented, complied with and updated as necessary.
All personnel (including sub-contractors)	— Comply with the requirements of this plan and all site rules. — Responsible for conducting all operations and activities in accordance with this plan. — Report all environmental hazards, near misses and incidents to the site manager or Project Environmental Representative. — Attend inductions and all relevant training.

4.6 Toolbox talks/pre-starts

Further to site inductions, regular toolbox meetings will be held to highlight the activities occurring during that day including a briefing on potential environmental issues (such as odour, noise or dust generating activities) and the control measures in place to mitigate off-site impacts.

4.7 Site monitoring and record keeping

The site will be regularly inspected and assessed to ensure compliance with this CEMP.

4.7.1 Site Inspection Checklist

The Rohrig Site Inspection Checklist is a checklist completed by project team members to assess the Health, Safety & environmental condition of the site.

4.7.2 Project Mangers Inspection Checklist

The Rohrig Project Managers Inspection Checklist has been developed to monitor the physical conditions on-site and intended to be done by the Project Manager from the site. This Assessment will be conducted within a month of the job starting on site, then monthly throughout the duration of the project.

4.7.3 *Site Monitoring Schedule*

Rohrig Site Inspection Checklist to be undertaken as a minimum Weekly by the site manager.

Rohrig Project Mangers Inspection Checklist to be undertaken as a minimum Monthly by the project manager.

These inspections will be undertaken to ensure all environmental controls are maintained and functional and to maintain a record of environmental management.

4.7.3.1 Other monitoring

Other monitoring and record keeping will include:

- Refuelling.
- Deliveries of materials and source
- Waste generated and recycling/disposal volumes and locations – via waste register.
- Any issues identified e.g. dust, noise, and implemented mitigation measures.
- Complaints or enquiries
- Incidents

Any further action required to mitigate issues identified should be communicated to the Project Manager and plans updated to mitigate issues.

4.8 Complaints

For effective complaint resolution, the following information is required as a minimum:

- Complainants contact details.
- Date, time and location of the complaint.
- Description of complaint.
- The requested remedy/action.
- Immediate action, if required.
- Notification of the complaint and response measures to be issued to all employees and sub-contractors via communal notice board and outlined in following weeks' toolbox meeting to raise awareness.

All complaints are to be referred to the Project Manager for management of rectifications/outcomes.

Incidents and complaints are to be recorded via the Rohrig Procore system.

4.9 Auditing

Audits (both internal and external) may be undertaken during this project by Rohrig (or its representatives) to assess the effectiveness of environmental controls, compliance with this sub plan and other relevant approvals, licences and guidelines.

5 Site setup

5.1.1 Site layout

Figure 5-1 Site layout - Construction



Refer to site layout plan in Appendix F for further detail on site setup and access.

5.1.2 Project site hoarding

The following hoarding requirements must be complied with:

- No third-party advertising is permitted to be displayed on the subject hoarding/ fencing
- The Site Supervisor must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.

5.1.3 Project site fencing

Protective fencing is to be installed around the works area to prevent the public/staff and student access to the site. Students/staff or any unauthorised person are not permitted within the project site.

All fencing shall be securely installed, and fence panels have adequate bracing where required.

Fencing is to be maintained and checked regularly during construction to ensure there is no safety risk to school students.

5.1.4 Project site signage

Site signage must be prominently displayed at the access point(s) and at visible public locations along the boundary of the site during construction for the purposes of informing the public of project details.

Signage is to:

- Have minimum dimensions of 841 mm x 594 mm (A1) with any text on the sign to be a minimum of 30-point type size
- Be mounted at eye level on the perimeter hoardings/fencing so that people can read it
- Be durable and weatherproof and must be displayed throughout the works period
- Have information on:
  - The approved hours of work, and how long the construction is expected to take
  - The name of the builder, Certifier, structural engineer, site/ project manager
  - The company name (Rohrig), address and 24-hour contact phone number for site issues
  - Detail on how to make any project enquiries, or complaints.
- State that no un-authorised access is permitted, and give directions to site office

Site signage must be erected prior to the commencement of works and be maintained for the duration of works.

5.1.5 Housekeeping / project site amenity

Site appearance and tidiness is an important measure in reducing environmental and safety risk during construction.

Rohrig will regularly inspect and maintain damage to environmental controls, project site fencing, the project site compound, and shared roads.

The project site will be managed to keep it generally tidy to enable more effective environmental management and maintain visual amenity.

5.1.6 Site vehicles

All construction vehicles will be contained wholly within the work site and defined parking areas. All construction related vehicles must enter and exit the site via the defined site access points and not impede traffic on surrounding streets.

There must be sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.

5.1.7 Driver code of conduct

Prior to the commencement of construction a Driver Code of Conduct is to be prepared and communicated to heavy vehicle drivers as part of induction. This must be adhered to in order to minimise impacts of construction on the local and regional road network by managing access routes and driver behaviour.

5.1.8 Avoiding obstruction to the public

Public access, pedestrian or vehicle paths must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances outside of any approved construction work zones.

6 Environmental framework

6.1 Environmental Policy

Environmental
Policy

Rohrig is a proudly Australian company which, through hard work, inclusion and strong leadership, activates the potential in both our people and our projects. We work side-by-side with every client to ensure we maximise the value of the building for its life.

Rohrig is a commercial construction company based in New South Wales and Queensland, established by Glenn Rohrig in 1991. Since our inception we've created outstanding value across a range of sectors including education, hospitality, aged care, commercial, industrial and retail. We work collaboratively and transparently to bring your vision to life. With family values and a strong culture, we are determined to fulfil every promise. We stand behind your building for life.
Our construction and planning services include:

- Early Contractor Involvement (ECI)
- Design Management
- Detailed Design
- Practical Construction.

As a responsible business entity, we have an obligation to ensure our workers (including contractors and sub-consultants), clients and visitors at our premise, do not harm the environment as a result of our operations.

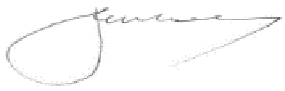
We at Rohrig acknowledge the importance of protecting the environmental as part of the community. In saying that we aspire to being a sustainable organisation which goes beyond minimising harm to the environment. To achieve this, we will endeavour to:

- ensure our management system complies with the requirements of ISO 14001:2015 - Environmental Management Systems
- implementing procedures and processes to identify, prevent and mitigate undesirable environmental impacts.
- identify the environmental risks to those potentially impacted by our operations and deploy the principles of the Hierarchy of Control to reduce such risk to the lowest levels possible
- comply with all relevant statutory obligations, regulations, and codes of practice.
- establish an environmentally friendly workplace designed to prevent pollution and or waste.
- promote and encourage environmental awareness and training to ensure individuals throughout our organisation are aware of their environmental responsibilities.
- executing and undertaking our operations in accordance with our management system
- fostering a collaborative approach between top management and workers to achieve a sustainable outcome.

It is important to note that environmental management is a shared accountability as well as an individual responsibility, for all persons impacted by our operations. At Rohrig, we seek the co-operation of all our stakeholders to achieve our environmental objectives. We emphasize the requirement to comply with the company's safe work practices at all times so that the environment is not harmed.

Rohrig will always encourage suggestions to improve our environmental objectives and work towards keeping environmental harm to a minimum in a sustainable, economically and feasible manner.

This policy applies to all business operations and functions and binds all its relevant stakeholders.



Glenn Rohrig
Managing Director

1st May 2024

6.2 Environmental Management System

Rohrig maintain systems to meet the requirements of ISO14001:2015 Environmental management systems.

Figure 6-1 EMS certification



6.3 Project environmental expectations

Rohrig are committed to operating in a manner that conserves resources & protects the environment.

To achieve this goal, they make environmental management a priority on all their sites and require active participation by everyone to adequately plan the work they are carrying out and to always act responsibly by adhering to the following principles:

- If a task cannot be carried out with no or minimal impact on the environment, they STOP immediately and only proceed when risk mitigation is in place at an acceptable level
- They make sure we have the appropriate consent, or that the correct level of risk assessment is done to reduce the potential impact risks associated with our work
- They minimise their waste and recycle/reuse as and when appropriate
- They prevent pollution and manage resources efficiently in all their activities
- They comply with all applicable codes of practice, standards and legislation, relevant to the project
- They continually strive to improve their environmental performance
- They promote a culture of environmental awareness and commitment
- They proactively support environmentally aware design and engineering solutions

6.4 General Responsibilities

Rohrig recognises that a successful business in today's working environment must focus on ensuring that the environment is not compromised at any stage or level in its business operations.

To this end, Rohrig takes an uncompromising position to these critical issues on any project under their control. An approach of zero-tolerance is maintained, and potential removal of any persons working on Rohrig projects and under the control of Rohrig who creates a danger or risk of harming themselves, others or the environment from this project.

Site monitoring

The

7 Project environmental management

The following sections detail the project specific requirement for environmental management during Stage 1 construction works.

7.1 Outdoor Lighting

Works will be undertaken during standard construction hours as specified in Section 3.2.4 of this CEMP. Construction lighting for night works will not be required for this project.

Prior to the installation of permanent outdoor lighting, Rohrig will submit evidence to the Certifier that all outdoor lighting within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and the design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.

7.2 Plant and equipment

All construction plant and equipment used on site must be regularly checked and maintained to minimise risk of spills.

Plant and equipment are to be operated in a proper and efficient manner and turned off when not in use to minimise fuel use, noise and vehicle emissions.

7.3 Refuelling

Plant will be refuelled from truck tanker bowsers wherever possible. Refuelling must be undertaken in a defined and contained area away from down gradient site boundaries and stormwater drains.

Refuelling of small items of equipment from portable containers is permitted. Care is to be taken to minimise risk of spills using funnels and drip trays during refuelling.

Spill kits are to be stocked and readily available and deployed for immediate clean up if fuel spills occur.

Fuel hoses and pumps are not to be left unattended while in use.

Vehicles will be refuelled offsite.

7.4 Spill mitigation

Rohrig and all sub-contractors will undertake a regular inspection and maintenance program for vehicle, plant and equipment to identify potential leaks and correct them immediately.

Washing, degreasing, services, cleaning or other maintenance of vehicles, plant or other equipment must not occur in any area where resulting contaminants may be released to any stormwater drain, land or waters.

7.5 Chemical storage and handling

Chemical purchase choices are based on the product being as environmentally friendly as possible prior to bringing to site. A register of all chemicals and hazardous substances stored on-site will be maintained.

- All stored chemicals must have correct label and relevant SDS available on-site (hard copy or digital)

- Chemicals should be stored correctly in a secure bunded area and stored safely for the specific chemical as per the SDS.
- The net capacity of the storage bund should be maintained at least 110% of the largest container
- Emergency spill kits are to be maintained and readily available whenever oils, fuels or chemicals are stored or handled and where plant is operating.
- All personnel are to be familiar with the location and procedures for using the spill kit and trained if necessary
- Ensure spills and leaks are promptly and appropriately contained and cleaned-up and supervisor notified.
- Disposal of chemicals is to be as per the requirements in the SDS.
- Containers should be recyclable where possible, otherwise disposed of correctly as per the label.

7.6 Traffic management and project site access

All site vehicles are to enter and exit via the defined project access routes. Refer to Appendix B Traffic Management plan for further details.

7.7 Construction noise and vibration

A Construction Noise and Vibration Management Plan (CNVMP) is included as Appendix A to this CEMP and details mitigation measures and work practices to minimise minimal impacts during the construction phase.

7.8 Erosion and sediment control

Refer to Appendix C for the site specific Construction Soil and water management plan incorporating measures for erosion and sediment control.

Erosion and sediment controls are to be in place for the duration of ground disturbance.

All erosion and sediment controls are to be installed as per Soils and Construction Volume 1, 4th ed 2004 Managing Urban Stormwater (The Bluebook).

The following general principles are to be adhered to during works:

i. Minimise disturbance footprint through appropriate works planning.
ii. Focus on erosion control as a priority where applicable.
iii. Install sediment controls before disturbing ground and for the duration of disturbance.
iv. Monitor and maintain controls to ensure function, especially before and after rain.
v. Progressive stabilisation of disturbed areas should be undertaken during works.
vi. Modify/update the Erosion and Sediment Control Plan (ESCP) as required as site conditions change.

7.9 Dust and odour

During construction works must be undertaken so that activities are carried out in a manner that minimises dust including emission of wind-blown or traffic generated dust.

Demolition of existing buildings has been completed prior to Stage 1 construction works and all potentially hazardous in situ building materials removed from site.

Mitigation measures are to be implemented to reduce the risk of dust generation during Stage 1 works including:

- All trucks to have their loads covered
- Vehicle speed limits are to be reduced to low speeds (<20kmh) on unsealed road surfaces
- The main vehicular access to the site from Morris Grove will be bitumen sealed
- Unsealed access roads are to be monitored and maintained to reduce vehicle generated dust.
- A water sprinkler system will be utilised during construction to mitigate dust generation
- A stable site access (grid) is constructed so that vehicles do not track dirt onto the sealed road network
- Public roads adjacent to the site are monitored and cleaned of dirt if required using manual or plant mounted brooms (not hosed into stormwater)
- Disturbed areas are to be stabilised progressively on site to minimise exposed soil surfaces.
- Bare soil areas or stockpiles that generate dust are to be stabilised or covered
- Demolition works are to have dust mitigation measures in place such as hosing or misting to reduce dust

If dust cannot be kept within the site boundary, then works should be stopped and methodology reviewed to mitigate dust generation.

7.9.1 Odour

The construction project is unlikely to generate significant odour issues.

Potential odour generating sources for the works include: fume generating materials such as paint

Mitigation for these potentitial odours to reduce impacts to receivers include, minimising use, selection of more appropriate options, timing odour works for when school is not operational, appropriate storage and disposal of any odour generating materials.

If complaints are received and odour issues affecting receivers outside the site boundary, then works should be stopped and methodology reviewed to mitigate odour generation.

7.10 Heritage

No Aboriginal or European cultural heritage constraints have been identified for the proposed development.

Note that there is potential for isolated pockets of surviving A horizon soils in construction area.

Refer to section 8.2 Unexpected finds protocol for procedures on how to manage heritage finds during the works.

7.11 Vegetation protection

Vegetation is not to be disturbed outside the defined works footprint.

All construction plant and equipment are to be stored within the defined cleared site footprint and not within any tree protection areas.

All areas outside the defined works footprint are designated as No Go for plant and vehicles.

All works are to be consistent with **Section 3.0 of the Arboriculture Impact Assessment Report –** Stage 1 prepared by Arterra as per the EIS.

7.12 Waste management

All waste generated by the project, is to be beneficially reused or recycled as a priority over disposal to landfill.

Recyclable site and construction waste is to be recycled in accordance with the NSW Government's "Waste Reduction and Purchasing Policy (WRAPP guidelines)".

All waste generated during construction is to be contained within the defined compound waste storage area.

All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).

Concrete pump out waste is to be contained within a designated lined wash out bund. Waste concrete is to be allowed to go off then removed for recycling offsite. No concrete slurry is to be disposed of onto ground or stormwater.

During construction, the waste register is to be maintained and record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.

Any hazardous materials requiring disposal during construction will be disposed of at a licenced waste disposal facility and records retained.

7.12.1 Waste streams

WASTE TYPE	ESTIMATED VOLUME	DISPOSAL
Bricks	>10m^3	Recycle
Concrete	>10m^3	Recycle
Tiles	<10m^3	Recycle
Timber (clean)	<10m^3	Recycle
Timber (treated)	<10m^3	Recycle
Asphalt	>10m^3	Recycle
Metals	>10m^3	Recycle
Plasterboard	>10m^3	Recycle
Green waste	<10m^3	Recycle
Plastic/cardboard	<10m^3	Recycle
General other	<10m^3	Landfill
Wastewater	<10m^3	Sewer/pump out
TOTAL	900m^3	

7.12.2 *Disposal contractors*

MET Recycling 134 Carnarvon Street, Silverwater, NSW 2128. EPA Licence EPA Licence link here.

BINGO Bins 1 Kangaroo Avenue, Eastern Creek NSW EPA licence link here.

7.13 Imported materials

All soil or quarry materials imported to site must be certified as either Virgin excavated natural material (VENM), Excavated natural material (ENM), or other that meets the requirements of a relevant order and exemption issued by the NSW EPA.

https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/resource-recovery-framework/current-orders-and-exemption

All soil materials imported to site are to have accurate records retained of the source, volume and type of fill. These records are to be retained and made available to the Certifier upon request.

7.14 Contamination

The existing building demolition has been completed prior to these Stage 1 construction works.

7.14.1 *Soil*

Soil geotechnical investigations have been undertaken at the site as part of preliminary planning. These are included in the EIS as appendix K.(William Clarke College Preliminary Stage 1 Site Investigation JK Environments 8th August 2022). The site investigation did not identify that contamination of site soils is likely at the site.

The demolition of the existing structure has been completed prior to construction of this project.

During the construction works including the removal of the pavements and prior to the commencement of excavation, a suitably qualified environmental consultant is to inspect the fill and undertake additional testing if determined to be necessary based on visual investigation to confirm the waste classification and anticipated disposal quantities to facilitate off-site disposal of the fill.

Refer to section 8.2.4 Unexpected finds – contamination for procedures for managing potential contamination identified during construction.

7.14.2 Preliminary *Waste Classification of Fill*

Based on the results of the geotechnical investigation the in-situ soil material at the site has been pre classified as follows:

- Fill material: General Solid Waste (non-putrescible). Fill should be disposed of to a facility that is appropriately licensed by the NSW EPA to receive this waste stream. The facility should be contacted to obtain the required approvals prior to commencement of excavation.
- Natural Soil and Bedrock: The natural soil at the site is likely to meet the definition of VENM for off-site disposal or re-use purposes. Confirmation testing to meet these criteria is to be undertaken if material is to be reused offsite as per EPA resource recovery orders and exemptions.

7.14.3 *Groundwater*

Groundwater extraction or dewatering is not required for this project. The preliminary geotechnical report included in the EIS as Appendix GG (JK Geotechnics 2022) indicated that groundwater seepage was not encountered during drilling of

test bores at the site. The proposed excavations for building footings are not expected to interact with existing groundwater tables.

Chemical storage and spill mitigation measures as set out in section 7.5 of this CEMP are to be adhered top to reduce risk of soil or groundwater contamination at the site.

8 Contingency Plans

8.1 Environmental Incidents

An incident is defined as an occurrence or set of circumstances that causes or threatens to cause material harm to the environment. This may include:

- pollution to land or water from a spillage or leak of a substance such as fuel or oil.
- unauthorised damage to native flora and fauna.
- failure of erosion and sediment control devices leading to sediment pollution of waterways or stormwater.
- unexpected finds of hazardous materials or heritage.
- damage to known heritage items or protected flora or fauna species.
- any contractual or compliance breaches.

If an emergency incident occurs, Rohrig emergency management plans (Included as Appendix **E)** are to be followed, with safety a priority.

As part of an incident response, an investigation will be undertaken and mitigation measures will be reviewed, and the CEMP updated to reduce risk of future incident.

8.1.1 Incident response and investigation

The following incident procedure steps will be followed if an incident occurs:

1. Stop work in affected area if necessary. Notify Rohrig site supervisor/Project manager of incident.
2. Safety is the primary concern, and no action should be taken if it is not safe to do so. If it is unsafe to act, isolate the area and notify emergency services (000).
3. If the incident can be managed locally, action must be undertaken to contain and minimise the effect of the incident on the environment.
4. Once made safe, notify the Project Manager and log the incident in Procore.
5. Investigation of incident will be undertaken by the Project Manager or suitable representative and include as a minimum:
   - Location of incident.
   - Nature of incident.
   - Time of incident.
   - Time of reporting incident.
   - Immediate control action.
   - Rectification measures implemented

   The incident investigation will determine causality and identify improvements to mitigation measures to be implemented to prevent future harm to the environment.

8.1.2 *Spill management and response*

If a spill of chemical occurs to ground:

1. Stop the spill at source as priority provided it is safe to do so
2. Report the spill incident immediately to Rohrig Site supervisor/Project manager
3. Identify chemical and if there are any WHS risks associated. Refer to SDS for information
4. Contact the NSW Fire and Rescue on 000 if the spill presents a risk of harm to people or the environment
5. If spill is manageable, contain and clean up using spill kit to contain and absorb the spilled material (Chemical spills should never be hosed away by water)
6. If soil has become contaminated, remove and dispose of as contaminated material
7. Ensure that any used spill kit materials (contaminated waste) are disposed appropriately
8. Investigate the cause of each spill to find and implement preventative actions to reduce the risk of a similar incident occurring

8.1.3 *Incident notification to NSW Planning Secretary*

The Planning Secretary must be notified through the **major projects portal** immediately after Rohrig becomes aware of an incident.

The notification must identify the development (including the development application number and the name of the development if it has one) and set out the location and nature of the incident.

8.1.3.1 Written Incident Notification Requirements

A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects portal within 7 (seven) days after becoming aware of an incident.

Notification is required to be given even if the immediate notification has not been given or if, having given such notification already, it becomes clear that an incident has not actually occurred.

Written notification of an incident must include the following information:

- Identify the development approval number
- Provide details of the incident including date, time, location, a brief description of what occurred and why it is classified as an incident.
- For contaminated materials – disposal location, suitable licencing and testing/remediation
- Identify how the incident was detected
- Identify when Rohrig became aware of the incident
- Identify any actual or potential non-compliance with conditions of consent
- Describe what immediate steps were taken in relation to the incident
- Identify further action(s) that will be taken in relation to the incident
- Provide a project contact for further communication regarding the incident.

Within 30 (thirty) days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, Rohrig must provide the Planning Secretary and any relevant public authorities (as determined by the

Planning Secretary) with a detailed Incident Report on the incident addressing all requirements below, and such further reports as may be requested.

The Incident Report must include:

- A summary of the incident
- Outcomes of an incident investigation, including identification of the cause of the incident
- Details of the corrective and preventative actions that have been and/or will be implemented to address the incident and prevent recurrence
- Details of any communication with other stakeholders regarding the incident.

8.1.4 EPA Reporting

Where an incident would equate to a reportable incident under the NSW POEO Act 1997, the NSW EPA is to also be notified within 24 hours of the incident occurring.

A reportable incident is defined as one that may cause material harm to the environment or a pollution incident.

- Material harm includes on-site harm, as well as harm to the environment beyond the premises where the pollution incident occurred.
- Pollution incident means an incident or set of circumstances during or as a consequence of which there is or is likely to be a leak, spill or other escape or deposit of a substance, as a result of which pollution has occurred, is occurring or is likely to occur.

https://www.epa.nsw.gov.au/reporting-and-incidents/incident-management/duty-to-notify-pollution-incidents

8.2 Unexpected Finds Protocols

Unexpected finds procedures are to be communicated to all site personnel as part of site induction.

8.2.1 Unexpected finds – Aboriginal heritage

In the event that excavation disturbs or identifies an Aboriginal object or suspected A horizon soils:

- All works must halt in the immediate area to prevent any further impacts to the suspected object(s)
- The area is to be demarcated and protected from further harm
- A suitably qualified archaeologist be engaged to identify and confirm object and the registered Aboriginal representatives must be contacted to determine the significance of the objects once verified
- If items are verified, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW and consultation is to occur with the relevant Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for the objects and site.

Works may only then recommence with the written approval of the Planning Secretary.

8.2.2 Unexpected finds – skeletal remains

In the event that a burial or skeletal remains are uncovered during work, then:

- All works must halt in the immediate area to prevent any further impacts to the suspected object(s)

- The area is to be demarcated and protected from further harm
- NSW Police and Heritage NSW are to be notified to guide next actions depending on the nature of the find
- A suitably qualified archaeologist may be required to determine the specific nature and significance of the skeletal remains and consultation with relevant stakeholders, the archaeologists and Heritage NSW would then be required to implement appropriate management strategies for the skeletal remains.
- Works may only then recommence with the written approval of Heritage NSW.

8.2.3 *Unexpected Finds Protocol – Historic Heritage*

If any unexpected suspected archaeological relics are uncovered during the work, then:

- All works must halt in the immediate area to prevent any further impacts to the suspected object(s)
- The area is to be demarcated and protected from further harm
- A suitably qualified archaeologist be engaged to identify and confirm object
- If confirmed, notice is to be given to Heritage NSW and the Planning Secretary
- Depending on the possible significance of the object, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW

Works may only then recommence with the written approval of the Planning Secretary.

8.2.4 *Unexpected finds - contamination*

Soil geotechnical investigations have been undertaken at the site as part of preliminary planning. These are included in the EIS as appendix K. (*William Clarke College Preliminary Stage 1 Site Investigation* JK Environments 8th August 2022). The site investigation did not identify that contamination of site soils at the site.

The demolition of the existing structure has been completed prior to construction of this project.

During excavation works the soils are to be monitored for signs of potential unexpected contamination.

of Indicators of contamination in soils may include:

- Discolouration of the soil, including staining and horizontal layers of discolouration
- Seepage of unusual liquids from soil or rock or an oily sheen on water leaving soils (or on nearby surface water)
- Odours from soil or water
- Other non-soil material sighted within fill or buried waste or services
- Potential fibrous material, fibro, pipes or potential asbestos containing material

If any suspected contamination is identified during works, then:

1. All works must **stop** in the immediate area to prevent any exposure or risk to safety or the environment
2. The area is to be demarcated and **protect**ed from further disturbance. Install barriers and signage to keep area isolated.
3. A suitably qualified contaminated lands specialist be engaged to **test, identify** and produce a **plan** to mitigate ether risk of harm from contamination.
4. **Implement remediation plan** as recommended – to remediate area (i.e. remove from site or other suitable method to cap and contain).

5. **Monitoring** may be required during mitigation works
6. **Remove risk from site**
7. Once area is **validated** as clean – works can then recommence.

Implement incident notification and reporting as per section 8.1.1 of this CEMP.

8.2.4.1 Asbestos handling

If unexpected asbestos is identified during construction in structures or in soil, Rohrig must consult with a suitable qualified specialist and SafeWork NSW concerning the handling of any asbestos waste that may be generated.

The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – 'Transportation and management of asbestos waste' must also be complied with.

All remediation or removal works are to be undertaken by a suitably qualified asbestos handling contractor.

Works may only then recommence once risk of harm is mitigated and site is validated as clean by a suitabley qualifierd hygienist.

Mitigation would likely require removal from site via a licensed asbestos removalist and disposal at an appropriately licenced facility. Appropriate licencing will be required for removal works.

8.2.5 Wet weather

The project site will be made safe and stable and shut down where required in excessive wet weather.

Earthworks will be avoided in wet conditions.

Erosion and sediment controls will be in place and functional prior to any shutdown.

8.2.6 Flood management

As detailed in the project EIS (Chapter 6.9.1) the site is not considered flood prone. Flood is not likely to occur at this stage 1 works site. This site is are has ground levels ground levels are more than 1 m higher than the 1% AEP flood levels.

Local stormwater systems may experience localised issues during high intensity rainfall events and extreme weather conditions such as flood forecast is to be monitored and factored into works planning day to day.

While flooding is not anticipated at the site, as part of emergency preparedness a Flood Emergency Management Plan has been prepared for this site. Refer to **Appendix E2** for detail.

8.3 CEMP Review and update

The CEMP is to be considered a live document and should be reviewed and updated during the project if the scope or any other environmental aspect changes.

A copy of the current CEMP is to be available on-site during the construction works.

Any revisions required are to be incorporated into an updated version and document made current.

Changes to this plan will be approved by the contractor's Project Manager documented in the document control section for each revision.

A copy of the updated plan and changes will be distributed to all relevant stakeholders.

8.4 Audit

As per the development consent section D35 Independent Audits of the works must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements (2020)*.

https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

9 Limitations

This Report is provided by WSP Australia Pty Limited (WSP) for Rohrig (Client) in response to specific instructions from the Client and in accordance with WSP's proposal dated 7/12/2022 and agreement with the Client dated 7/3/2023 (Greencap [owned by WSP] Terms and Conditions).

9.1 Permitted purpose

This Report is provided by WSP for the purpose described in the Agreement and no responsibility is accepted by WSP for the use of the Report in whole or in part, for any other purpose (Permitted Purpose).

9.2 Qualifications and assumptions

The services undertaken by WSP in preparing this Report were limited to those specifically detailed in the Report and are subject to the scope, qualifications, assumptions and limitations set out in the Report or otherwise communicated to the Client.

Except as otherwise stated in the Report and to the extent that statements, opinions, facts, conclusion and / or recommendations in the Report (Conclusions) are based in whole or in part on information provided by the Client and other parties identified in the report (Information), those Conclusions are based on assumptions by WSP of the reliability, adequacy, accuracy and completeness of the Information and have not been verified. WSP accepts no responsibility for the Information.

WSP has prepared the Report without regard to any special interest of any person other than the Client when undertaking the services described in the Agreement or in preparing the Report.

9.3 Use and reliance

This Report should be read in its entirety and must not be copied, distributed or referred to in part only. The Report must not be reproduced without the written approval of WSP. WSP will not be responsible for interpretations or conclusions drawn by the reader. This Report (or sections of the Report) should not be used as part of a specification for a project or for incorporation into any other document without the prior agreement of WSP.

WSP is not (and will not be) obliged to provide an update of this Report to include any event, circumstance, revised Information or any matter coming to WSP's attention after the date of this Report. Data reported and Conclusions drawn are based solely on information made available to WSP at the time of preparing the Report. The passage of time; unexpected variations in ground conditions; manifestations of latent conditions; or the impact of future events (including (without limitation) changes in policy, legislation, guidelines, scientific knowledge; and changes in interpretation of policy by statutory authorities); may require further investigation or subsequent re-evaluation of the Conclusions.

This Report can only be relied upon for the Permitted Purpose and may not be relied upon for any other purpose. The Report does not purport to recommend or induce a decision to make (or not make) any purchase, disposal, investment, divestment, financial commitment or otherwise. It is the responsibility of the Client to accept (if the Client so chooses) any Conclusions contained within the Report and implement them in an appropriate, suitable and timely manner.

In the absence of express written consent of WSP, no responsibility is accepted by WSP for the use of the Report in whole or in part by any party other than the Client for any purpose whatsoever. Without the express written consent of WSP, any use which a third party makes of this Report or any reliance on (or decisions to be made) based on this Report

is at the sole risk of those third parties without recourse to WSP. Third parties should make their own enquiries and obtain independent advice in relation to any matter dealt with or Conclusions expressed in the Report.

9.4 Disclaimer

No warranty, undertaking or guarantee whether expressed or implied, is made with respect to the data reported or the Conclusions drawn. To the fullest extent permitted at law, WSP, its related bodies corporate and its officers, employees and agents assumes no responsibility and will not be liable to any third party for, or in relation to any losses, damages or expenses (including any indirect, consequential or punitive losses or damages or any amounts for loss of profit, loss of revenue, loss of opportunity to earn profit, loss of production, loss of contract, increased operational costs, loss of business opportunity, site depredation costs, business interruption or economic loss) of any kind whatsoever, suffered on incurred by a third party.



EMP Checklist

The below Table 9-2 Conditions of consent - CEMP reference section shows where the specific conditions of consent (as per EIS) have been addressed in this CEMP document.

Table 9-1 CEMP checklist is as per Environmental Management Plan Guideline for Infrastructure Projects (April 2020 NSW Department of Infrastructure Assessments, Planning and Assessment).

Table 9-2 Conditions of consent - CEMP reference section shows where the specific conditions of consent (as per EIS) have been addressed in this CEMP document.

Table 9-1 CEMP checklist

Requirement	Y / N / NA
Has the EMP been prepared in consultation with all relevant stakeholders as per the requirements of the conditions of consent?	NA
Have the views of the relevant stakeholders been taken into consideration? Have appropriate amendments been made to the EMP and does the EMP clearly identify the location of any changes?	Y
Has the EMP been internally approved by an authorised representative of the proponent or contractor?	Y
Does the EMP describe the proponent's Environmental Management System (EMS) (if any), and identify how the EMP relates to other documents required by the conditions of consent?	Y
Does the EMP include the required general content and version control information?	Y
Does the EMP have an introduction that describes the project, scope of works, site location and any staging or timing considerations?	Y
Does the EMP reference the project description? (Section 3.3) Does the EMP reference a Community and Stakeholder Engagement Plan (or similar) or include community and stakeholder engagement actions (if required)?	Y Y
Have all other relevant approvals been identified? Has appropriate information been provided regarding how each approval is relevant?	Y
Has the environmental management structure and responsibilities been included?	Y
Does the EMP include processes for training of project personnel and identify how training and awareness needs will be identified?	Y

Does the EMP clearly identify the relevant legal and compliance requirements that relate to the EMP?	Y
Does the EMP include all the conditions of consent to be addressed by the EMP and identify where in the EMP each requirement has been addressed?	Y
Have all relevant guidelines, policies and standards been identified, including details of how they are relevant?	Y
Is the process that will be adopted to identify and analyse the environmental risks included?	NA (EIS)
Have all the environmental management measures in the EIA been directly reproduced into the EMP?	Y
Have any additional environmental management measures been included in the EMP?	Y
Have environmental management measures been written in committed language?	Y
Have project environmental management measures, including hold points, been identified and included?	Y
Are relevant details of environmental monitoring that will be carried out included?	Y
Have the components of any environmental monitoring programs been incorporated?	Y
Are environmental inspections included? Does the EMP document all relevant compliance monitoring and reporting requirements for the project?	Y
Does the EMP describe the types of plans or maps (such as environmental control maps) that will be used to assist with the management of environmental matters on site?	Y
Does the EMP list environmental management documents?	NA
Is an auditing program referenced? Does the EMP include the incident notification and reporting protocols that comply with the relevant conditions of consent?	Y Y
Does the EMP identify the project role/position that is responsible for deciding whether an occurrence is an incident?	Y
Does the EMP describe a corrective and preventative action process that addresses the requirements?	Y
Does the EMP include details of a review and revision process that complies with the requirements?	Y

Table 9-2 Conditions of consent - CEMP reference section

Condition	Requirement	CEMP reference
C1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction and operation at least 48 hours before those dates	4.1
C2	If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage.	4.1
C5 C6 C7	Pre-Construction Survey – Adjoining Properties Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of residential/commercial buildings that are likely to be impacted by the development. Where the offer for a pre-construction survey is accepted (as required by Schedule 3 condition C5), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings. Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by Schedule 3 condition C5, the Applicant must: (a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; (b) submit a copy of the Pre-Construction Survey Report to the Certifier (c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.	**Appendix A**
C8   <

	(i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. (e) include any specific requirements around traffic, noise and vibration, visual impacts, amenity, flora and fauna, soil and water, contamination, heritage.	
C12	Outdoor Lighting Prior to the installation of outdoor lighting, evidence must be submitted to the Certifier that all outdoor lighting within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	7.1
C13 C14	Management plans required under this consent must be prepared having regard to relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). Construction Environmental Management Plan	**Appendix F** This CEMP
C15	The Applicant must not commence construction of the development until the CEMP is approved by the Certifier and a copy submitted to the Planning Secretary.	1.5
C16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) be consistent with the Section 9 - Construction Pedestrian and Traffic Management Plan Methodology (Stage 1) in the Traffic Impact Assessment prepared by Ptc dated 27 June 2023; (c) be prepared in consultation with Council and TfNSW; (d) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and (e) detail heavy vehicle routes, access and parking arrangements.	**Appendix B**
C17	The Construction Noise and Vibration Management Sub-Plan (CNVMSP) must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced noise expert;	**Appendix A**

	(b) be consistent with recommendations in Stage 1 Works Noise and Vibration Impact Assessments dated 20 March 2023 and prepared by SLR Consulting Australia Pty Ltd; (c) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (d) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers; (e) include strategies that have been developed with the community for managing high noise generating works; (f) describe the community consultation undertaken to develop the strategies in Schedule 3 condition C17(e); (g) include a complaints management system that would be implemented for the duration of the construction; and (h) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the management measures in accordance with Schedule 3 condition C13.	
C18	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council (b) describe all erosion and sediment controls to be implemented during construction, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book' (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the site); (d) detail all off-site flows from the site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to, 1 in 5-year ARI and 1 in 100-year ARI).	**Appendix C** 7.8 8.2.6
C19	Prior to thew commencement of any construction a Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: (a) minimise the impacts of earthworks and construction on the local and regional road network; (b) minimise conflicts with other road users; (c) minimise road traffic noise; and (d) ensure truck drivers use specified route	5.1.7
C20	Unexpected Contamination Procedure Prior to the commencement of any construction, the Applicant must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. Where any material identified as contaminated is to be disposed off-site, the disposal location and results of testing submitted to the Planning Secretary prior to its removal from the site.	8.2.4
C21	Construction Parking	3.2.6

	Prior to the commencement of any construction, the Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	Site induction
C22/23	Site Contamination Prior to the commencement of any construction, the Applicant must engage a NSW EPA-accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.	7.14
C24	Prior to the commencement of any construction, the Applicant must prepare and implement for the duration of construction: (a) flood warning and notification procedures for construction workers on site; and (b) evacuation and refuge protocols.	8.2.6
D1	Site Notice A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purposes of informing the public of project details and must satisfy the following requirements: (a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size. (b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period. (c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and (d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.	5.1.4
D2	Operation of Plant and Equipment All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner	7.2
D3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required.	7.14
D4	Upon completion of the demolition works of the car park (including removal of the surface), the Applicant must submit to the Certifier, for information.	7.14

	(a) an asbestos clearance inspection and certificate, prepared and signed by a suitability qualified professional (SafeWork NSW Licensed Asbestos Assessor) (if asbestos is found); and (b) a statement confirming that a suitably qualified consultant has conducted inspection of the exposed surfaces.	
D5	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.	3.2.4
D6	Construction activities may be undertaken outside of the hours in Schedule 3 condition D5 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.	3.2.4.1
D7	Notification of such construction activities as referenced in Schedule 3 condition D6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	4.2
D8	Rock breaking, rock hammering, sheet piling, pile driving, and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday. (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	3.2.8
D9	The Applicant must carry out the construction of the development in accordance with the most recent version of the approved CEMP (including Sub-Plans).	8.3
D10	All construction vehicles are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.	5.1.6
D11	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and	5.1.2

	(b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.	
D12	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.	5.1.8
D13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved CNVMSP required by Schedule 3 condition C17.	**Appendix A**
D14	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under Schedule 3 condition D5 unless approved by Schedule 3 condition D6.	
D15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	
D16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time).	**Appendix A**
D17	Vibratory compactors must not be used closer than 30m from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in Schedule 3 condition D16.	
D18	The limits in Schedule 3 condition D16 and Schedule 3 condition D17 apply unless otherwise outlined in a CNVMSP required by Schedule 3 condition C17.	
D19	For the duration of the construction works: (a) street trees must not be trimmed or removed unless it forms a part of this development consent or prior written approval from Council is obtained or is required in an emergency to avoid the loss of life or damage to property; (b) all street trees immediately adjacent to the approved disturbance area / property boundaries must be protected at all times during construction in accordance with Council's tree protection requirements. Any street tree, which is damaged or removed during construction due to an emergency, must be replaced, to the satisfaction of council;	7.11

	(c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Impact Assessment Report – Stage 1 prepared by Arterra dated 15 July 2022; and (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	
D20 D21	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent. During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	7.9
D22	All erosion and sediment control measures must be effectively implemented and maintained in accordance with the CSWMSP required by Schedule 3 condition C18.	7.8
D23	The Applicant must: (a) all soil materials designed for off-site disposal as part of the development, including any virgin excavated natural material, are pre-classified in accordance with EPA Waste Classification Guidelines (2014); (b) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site; (c) keep accurate records of the volume and type of fill to be used; and (d) make these records available to the Certifier upon request.	7.12
D24	Adequate provisions must be made to collect and discharge stormwater drainage during construction of the building to the satisfaction of the Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	
D25	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction	4.3

D26	In the event that surface disturbance identifies a new Aboriginal object: (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; (c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS; (d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and (e) works may only recommence with the written approval of the Planning Secretary.	8.2.1
D27	If any unexpected archaeological relics are uncovered during the work, then: (a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary; (b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and (c) works may only recommence with the written approval of the Planning Secretary.	8.2.3
D28	In the event that a burial or skeletal remains are uncovered during work, then: (a) all works must cease immediately in that area and the NSW Police and Heritage NSW contacted; (b) a suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains; (c) the Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the skeletal remains; and (d) works may only recommence with the written approval of Heritage NSW.	8.2.2
D29 D30 D31	All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties. D30. All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014). D31. The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	7.12

D32 D33	D32. The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction. D33. The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance	
D34	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	7.1
D35-D40	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	8.4

