CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Building 2C and 2D Oakdale West Industrial Estate SSD 9794683

Prepared for:

Goodman Property Services (Aust) Pty Ltd
The Hayesbery
1-11 Hayes Road
Rosebery NSW 2018



PREPARED BY

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BASIS OF REPORT

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DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
630.30347-R01-v1.5	8 November 2022	Alanna Ryan	Stephen Shoesmith	Stephen Shoesmith



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1 Introduction

1.1 Development Overview

Goodman Property Services (Aust) Pty Ltd (Goodman) obtained a State Significant Development Consent (SSD) 9794683 for the Oakdale West Estate (Oakdale West) Stage 3 Development including construction, fit out, operation and use of warehouse buildings 2A, 2C and 2D and, associated office space and parking.

Oakdale West is a warehousing and a distribution hub at 2 Aldington Road, Kemps Creek in Western Sydney Employment Area (**Figure 1**). SSD 7348 was approved on 13 September 2019 for the 'Concept Plan' and 'Stage 1 Development' of Oakdale West.

The Concept Plan is a 'Master Plan' to guide the staged development of Oakdale West and core development controls that will form the basis for design and assessment of future development applications for the site (see **Figure 2**). The Stage 1 Development includes estate-wide earthworks, infrastructure, and services and the construction and operation of warehouses in Precinct 1. At the time of writing, SSD 7348 has been modified on ten occasions, with an eleventh modification to be submitted to DPE shortly.

At the time of writing, in addition to SSD 9794683, there have also been two additional SSDs approved at Oakdale West, for Building 2B in Precinct 2 (SSD 10397) and Building 4E in Precinct 4 (SSD 22191322).

A copy of Development Consent SSD 9794683 is attached as **Appendix A**.

The key features of Buildings 2C and 2D include:

- Construction and fit out of Buildings 2C and 2D including office space with a Gross Floor Area of 10,565m2 for Building 2C and 6,235 m2 for Building 2D.
- Onsite parking, including 53 spaces (incl 2 accessible) for Building 2C and 56 spaces (incl 1 accessible) for Building 2D.
- Private car entrance/exit at Estate Road 03 to service Building 2C & 2D
- Truck entry/exit northern end of Estate Rd 03 to service buildings 2C & 2D
- Associated earthworks, landscaping and signage

The layout of Buildings 2C and 2D are shown in Figure 3, and a perspective of the Buildings are shown in Figure 4.



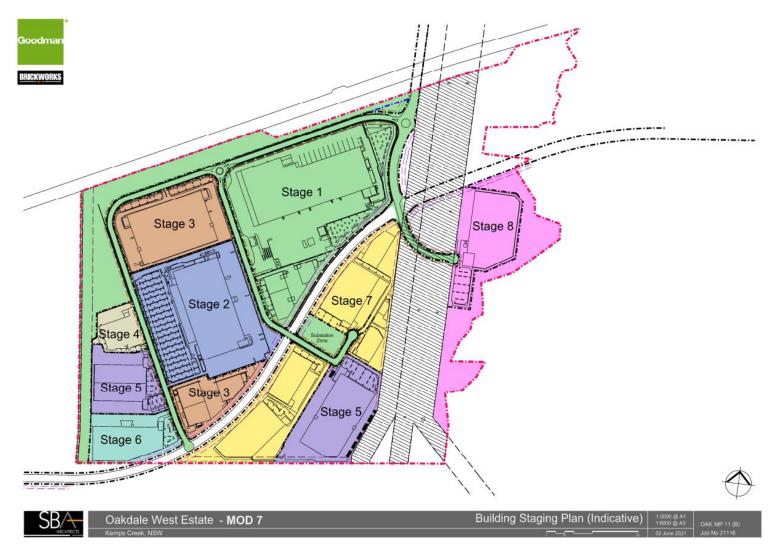


Figure 1 Oakdale West Staging Plan

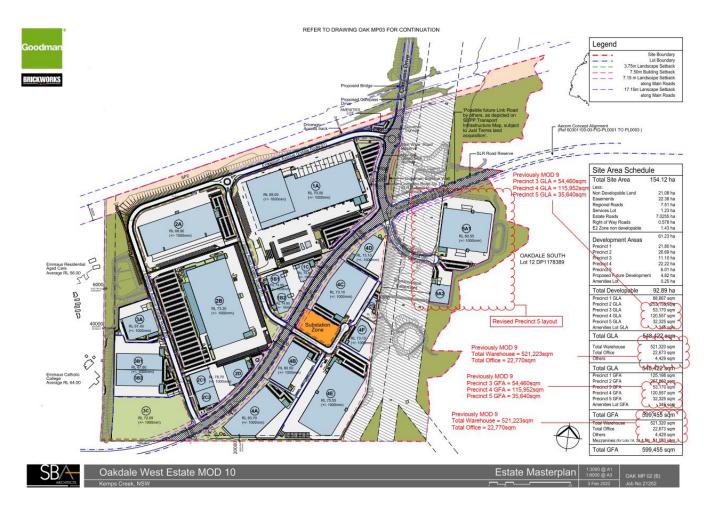


Figure 2 Oakdale West Precinct Plan

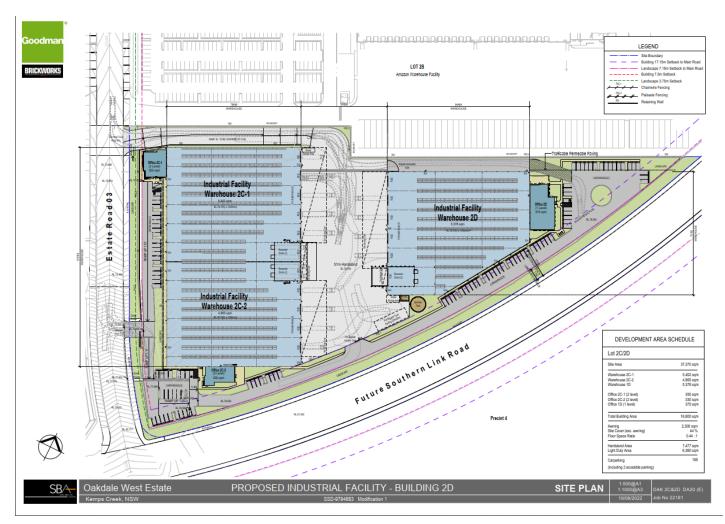


Figure 3 Building 2C and 2D Layout





Figure 4 Proposed Buildings 2C and 2D

1.2 CEMP Context

This CEMP has been prepared to address the specific requirements of SSD 9794683 and in consideration of the *Guideline for the Preparation of Environmental Management Plans* (Department of Infrastructure, Planning and Natural Resources 2004).

It is noted that this CEMP has been prepared for Buildings 2C and 2D, and a separate CEMP has been prepared for Building 2A.

The following specialist management plans have been prepared to support this CEMP:

- Construction Noise and Vibration Management Plan (CNVMP) (SLR);
- Construction Air Quality Management Plan (CAQMP) (SLR);
- Construction Traffic Management Plan (CTMP) (ASON);
- Soil and Water Management Plan (SWMP) (Rubicon);
- Erosion and Sediment Control Plan (ESCP), appended within the SWMP (Rubicon);
- Waste Management Plan (WMP) (SLR);
- Flora & Fauna Management Plan (Ecologique);
- OWE Unexpected Finds Protocol Contamination (UCP) (AECOM);
- OWE Community Consultation Strategy (CCS) (SLR);
- OWE Unexpected Finds Protocol Archaeological Items (UFP) (Artefact); and
- Sustainability Management Plan (SMP) (SLR).



1.2.1 Scope

This CEMP has been prepared to satisfy C1 - C4 of SSD 9794683. The specific requirements of these consent conditions, along with where these requirements have been addressed within this CEMP, are listed in **Table 1**.

Table 1 SSD 9794683 CEMP Context

SSD 9794683 Consent Condition	CEMP Section			
C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:				
 a) details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; 	(i) Section 3.3 (ii) Section 4 (iii) Refer to specialist management plans			
b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 4			
c) a program to monitor and report on the: (i) impacts and environmental performance of the development; and (ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 5			
 a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; 	Section 5.4			
e) a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 6			
f) a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); (ii) complaint; (iii) failure to comply with statutory requirements; and	(i) Section 3.5 and 5.2 (ii) Section 3.6 and 5.2 (iii) Section 5.2			
g) a protocol for periodic review of the plan. Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans	Section 6			
C2. The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.	This Plan			
C3. As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following:				
a) Construction Traffic Management Plan (see Condition B2);	Section 4.5			
b) a Driver Code of Conduct (see Condition B13);	Section 4.5			
c) an Erosion and Sediment Control Plan (see Condition B19); and	Section 4.6			
d) A Waste Management Plan (see Condition B36). Section 4.7				



SSD 9794683 Consent Condition	CEMP Section
C4. The Applicant must:	
 a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and 	Noted
b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	Noted

1.2.2 Objectives

The objectives of this CEMP are to:

- Establish the framework for managing and mitigating the potential for adverse environmental impacts as a result of the construction of the development;
- Clearly and concisely document the commitments made in the EIS (Keylan Consulting 2021) and Response to Submissions (RTS) (Keylan Consulting 2021), including relevant management plans, that are required to be implemented with during construction;
- Demonstrate to Department of Planning and Environment (DPE) how the applicant proposes to meet all of its regulatory obligations including those outlined in the Conditions of Consent;
- Outlines the controls to be implemented by the contractor in order to meet those obligations;
- Clearly and concisely document the conditions imposed by SSD 9794683 that are required to be implemented and/or complied with during the construction phase; and
- Assist to establish Building 2C and 2D at Oakdale West in a manner that avoids (where possible) or minimises impact to the surrounding environment and populace.

1.2.3 Consultation

Consultation for this CEMP, although not required under SSD 9794683, has been undertaken in accordance with SSD 7348 Condition C18(b). Feedback received has been summarised below in **Table 2** and is attached as **Appendix B**.

Table 2 Consultation

Government Agency	Consultation Received
Water NSW	Water NSW acknowledged the receipt of the CEMP and provided no specific comment. Response received 13 October 2022.
Penrith City Council	Council provided advice on 26 October 2022. Council required the CEMP be updated to reflect requirements for unexpected contamination finds reporting and completing consultation to undertake remediation.
Endeavour Energy (EE)	EE confirmed that no specific comments were to be provided. Response received 12 October 2022.
Transgrid	Transgrid confirmed there is no concerns regarding transmission lines or easements and provided no specific comment. Response received 11 October 2022.
Traffic for NSW (TfNSW)	TfNSW provided advice on 1 November 2022. No changes are triggered by the advice.



Government Agency	Consultation Received
Department of Environment (DPE)	Not yet issued



2 Development Description

2.1 Location

Oakdale West is legally described as Lot 101 to 103 in DP 1262308 and Lot 105 to 111 DP 1262310, at the far south-western extent of the Western Sydney Employment Area (WSEA) within the Penrith Local Government Area (LGA).

Oakdale West is bound to the north by the Water NSW Pipeline and to the east by the Ropes Creek riparian corridor. Land along the eastern boundary of the site is also affected by a transmission easement associated with Transgrid infrastructure. To the east of the site is Goodman's Oakdale South Estate. Emmaus Catholic College and Emmaus Retirement Village is located to the west of the site. Other boundaries interface with adjoining rural lands used for a mix of rural-residential and agricultural.

As shown in **Figure 2**, Buildings 2C and 2D are within Precinct 2, towards the southern boundary of Oakdale West, adjacent to Link Road.

2.2 Construction Activities and Staging

Construction is scheduled to commence in December 2022 and extend until September 2023. The construction activities will be staged and are summarised in **Table 3**.

Table 3 Construction Staging

Stage	Indicative Duration	
Civil works	October 2022 to March 2023	
Establishment of site sheds and fencing	December 2022	
Warehouse and office construction	December 2022 to April 2023	
Warehouse and office fit out	May 2023 to September 2023	

Construction activities include:

- Detailed excavation;
- Pouring of concrete slabs on ground and suspended slabs to the office building;
- Erection of structural steel warehouse;
- Install of retaining walls;
- Install of civil stormwater infrastructure;
- Roofing and cladding to warehouse;
- Internal fit out of warehouse and office;
- Install of loading dock facilities and building services; and
- Building ring road, paving and landscaping.



No vegetation clearing, bulk earthworks or supporting infrastructure will be required as part of Stage 3 as this has been approved and undertaken as part of Stage 1 in accordance with SSD 7348.

2.3 Construction Hours

Construction hours will be in accordance with Conditions B7 and B8 of Development Consent SSD 9794683, which are reproduced below:

B7. The Applicant must comply with the hours detailed in Table 2, unless otherwise agreed in writing by the Planning Secretary.

Table 2: Hours of Work

Activity	Day	Time
Construction	Monday – Friday	7 am to 6 pm
	Saturday	8 am to 1 pm

B8. Works outside of the hours identified in Condition B8 may be undertaken in the following circumstances:

- a) works that are inaudible at the nearest sensitive receivers;
- b) works agreed to in writing by the Planning Secretary;
- c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
- d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.

The construction hours will be provided to all staff and contractors in the induction. The movements of staff and contractors will be recorded for this project.

2.4 Construction Contact Details

Table 4 lists the key contacts during the construction of Buildings 2C and 2D.

Table 4 Construction Contact List

Role	Name	Company	Contact Details
Project Principal/Superintendent	Adrian Tesoriero	Goodman	0420 973 607 adrian.tesoriero@goodman.com
Site Manager	Jason Thrift	Prime Constructions	0438 198 901 jthrift@primeconstruct.com.au
Contractor's Project Manager	Bryan Murphy	Prime Constructions	0418 244 574 bmurphy@primeconstruct.com.au
Contractor's WHS&E Advisor	Geoff Hewitt	Prime Constructions	0427 208 116 ghewitt@primeconstruct.com.au



Role	Name	Company	Contact Details
Environmental Representative	Carl Vincent	ERSED	0424 203 046 carl.vincent@ersed.com.au
Communications and Community Liaison Representative	Kiera Plumridge	SLR	0458 967 285 kplumridge@slrconsulting.com

2.5 Construction Site Access

Access to the site shall be available via Compass Drive via the Southern Link Road, and Emporium Avenue, as shown below. Relevant truck routes are outlined within **Figure 5**.

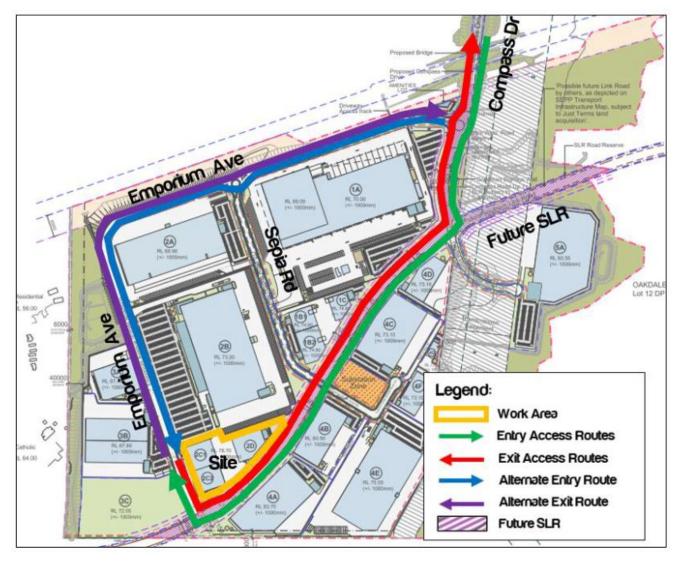


Figure 5 Construction Site Access Routes

Source: CTMP (Ason 2022)



2.6 Contractor Car Parking

All contactor parking areas will be wholly within dedicated parking areas in the Oakdale West Estate. The engaged contractor shall nominate Contractor parking zones that do not obstruct any vehicle manoeuvre routes. The location of Contractor parking lots are expected to change as construction continues and encompasses various portions of the Site. Where possible, contractor car parking areas will be separated from truck movements.



3 Environmental Management Framework

3.1 Environmental Policy

Prime Constructions Pty Ltd (Prime Constructions) promotes and encourages a sustainable environment throughout their business activities and sources supplies and services in ways that prevent pollution and promote compliance with legal and other requirements. As a result, an Environmental Policy has been developed and implemented, which will be implemented throughout the duration of the construction of Building 2C and 2D.

Prime Constructions Environmental Management System is certified by Global-Mark to ISO 14001:2016 Environmental Management Systems. A copy of the Environmental Policy is attached as **Appendix C**.

3.2 Roles and Responsibilities

The key personnel responsible for environmental management during construction of Building 2C and 2D are listed in **Table 5**.

Where Goodman is nominated as having responsibility as the Applicant, this may be delegated to their specialist consultants and their contractors.

Table 5 Personnel Responsible for Environmental Management

Role	Responsibilities		
Project Principal	Environmental reporting responsibility associated with the development.		
Contract Superintendent	Environmental reporting responsibility associated with the development.		
Project Manager	Environmental reporting responsibility associated with the development.		
	 Overall responsibility for environmental management and compliance; 		
	 Oversee the implementation of this CEMP and request adequate resources to enable implementation of this CEMP; 		
	 Report on the performance of the CEMP to the Project Manager for review and as a basis for system improvement; 		
	 Liaise with Goodman to keep them informed of the project's progress; 		
	 Coordinate environmental inspections and reporting and authority liaisons; 		
Contractor's Project Manager	 Record, notify, investigate and respond to any environmental incidents and, where necessary, develop and implement corrective actions; 		
	 Direct reasonable steps be taken to avoid or minimise any unintended or adverse environmental impacts, and, failing the effectiveness of such steps, direct that the relevant actions cease immediately should an adverse impact on the environment be likely to occur. 		
	 Attend the Environmental Review Group (ERG) meetings if ERG meetings are deemed necessary by the Environmental Consultant; and 		
	 Provide adequate environmental inductions/training to employees and contractors regarding their requirements under this CEMP. 		



Role	Responsibilities
Contractor's National OHSE Manager	 Ensure the legislative and corporate safety, health and environment management measures and controls are implemented and maintained; Participate in risk and hazard identification and control; Participate in incident investigations and management; and Participate in health and safety inspections.
	 Ensure familiarity, implementation and compliance with this CEMP and appended management plans; Support Goodman's commitment to sustainability, environmental management and compliance;
All employees, contractors and subcontractors	 Work in a manner that will not harm the environment or impact on surrounding receptors;
	 Report all environmental incidents and complaints to the Project Manager without delay; and
	 Report any inappropriate construction practices and/or environmental management practices to the Project Manager without delay.



3.3 Statutory Requirements

3.3.1 SSD 9794683

The Development will be constructed in accordance with SSD 9794683, including the documents referenced under Condition A2 of the Consent:

- The Conditions of Consent;
- Written directions from the Planning Secretary;
- The EIS (Keylan 2021) and Response to Submissions (Keylan 2021), including all specialist assessments and other appendices;
- The development layout plans and drawings attached to the Development Consent as Appendix 1; and
- The management and mitigation measures attached to the Development Consent as Appendix 3.

If there is any inconsistency between the plans and documentation referred to in Condition A2, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of SSD 9794683 prevail to the extent of any inconsistency. The Project Manager will be notified if any inconsistencies are identified.

SSD 9794683 imposes a number of environmental performance and management requirements applicable to the construction of Buildings 2C and 2D.

The CEMP Scope has been guided by Conditions C1 - C4 of this consent, as shown in **Section 1.2.1**. In addition to this, all conditions of consent relevant to this CEMP are attached at **Appendix D**, including reference to how these conditions have been addressed.

A copy of the full Consent for SSD 9794683 is attached at **Appendix A.**

3.3.2 SSD 7348

The works at Buildings 2C and 2D will comply with the relevant conditions of SSD 7348.

SSD 7348 incorporates the approval of a 'Concept Proposal' to guide the future development of the estate and consent for the 'Stage 1 Development'. As such, conditions applicable to this CEMP are limited to those contained in Schedule B and Schedule C of SSD 7348.

Schedule D of SSD 7348 is specific to the Stage 1 Development (including the WNSLR) and is therefore generally not applicable to this CEMP. Notwithstanding this, where appropriate, relevant conditions have been considered and addressed to ensure a consistent and robust approach to the management of construction environmental impacts across the Oakdale West Estate.



3.4 Inductions and Environmental Training

The Contractor's Project Manager will ensure that all employees and contractors involved in the construction of Buildings 2C and 2D at Oakdale West are appropriately inducted and trained prior to commencing work on site. Training in relation to environmental responsibilities and implementation of this CEMP will take place initially through the site induction training and then on an ongoing basis through 'toolbox talks' (or similar).

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

- Purpose and objectives of the CEMP;
- Requirements of due diligence and duty of care;
- Conditions of any environmental licences, permits and approvals;
- Potential environmental emergencies on site and the emergency response procedures (including the Emergency Spill Response Plan), locations and training in the use of emergency spill kits for spills on water and on land;
- Reporting, and notification and management requirements for pollution, contamination and other environmental incidents, and for damage and maintenance to environmental controls;
- High-risk activities and associated environmental safeguards i.e. earthworks, vegetation clearing, night
 works, operation and maintenance of concrete washouts, and washing, refuelling and maintenance of
 plant and equipment;
- the environmental sensitivity of all retained native vegetation, which are critically endangered ecological communities under both State and Federal legislation (Section 4 FFMP);
 - Legal duty of care to ensure that no deliberate or inadvertent clearing or damage resulting from the activities being undertaken;
 - The penalties that apply under both State and Federal legislation for any deliberate or inadvertent clearing or damage resulting from the activities being undertaken;
 - The stop work procedure required should any damage occur to native vegetation (refer Section 5).
- Site-specific issues including:
 - Sound erosion and sediment control practices, water quality controls and sediment basin management (see **Section 4.6**);
 - Responsibilities under the *Heritage Act 1977* if an object of potential non-Aboriginal heritage is uncovered during construction;
 - The potential to encounter wildlife; and the stop works procedure that will be implemented in the event any fauna unexpectedly occurs (see Section 4.9);
 - Access into the Water NSW pipeline corridor is prohibited unless written access consent has been obtained from Water NSW;
 - Noise, vibration and air quality management controls (see Sections 4.2, 4.3 and 4.4);
 - Requirement to maintain surrounding property access for residences and businesses and to minimise disruptions to these properties for the duration of construction;



- · Location of reuse bins, washing, refuelling and maintenance of vehicles, plant and equipment;
- Waste minimisation principles (see Section 4.7);
- Identification, reporting and management of contaminated land (see Section 4.11); and
- Incident management processes (see Section 3.5).

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

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

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

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

3.5 Incident and Non-Compliance Response and Handling Procedure

For the purposes of this CEMP, SSD 9794683 describes an 'incident' as an occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. SSD 9794683 describes a 'non-compliance' as an occurrence, set of circumstances or development that is a breach of the consent.

3.5.1 Performance Objective

To ensure that any incident and/or non-compliance caused by or relating to the construction of Buildings 2C and 2D is effectively responded to, and any resulting adverse environment and/or human health impact is promptly prevented or effectively managed.

3.5.2 Responsibility

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

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

The induction and toolbox talks outlined in **Section 3.4** will be used to ensure all site employees, contractors and subcontractors are aware of and understand their obligations for incident and/or non-compliance response.



3.5.3 Notification Requirements

3.5.3.1 Incidents

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

- (a) harm to the environment is material if:
 - (i) it involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial, or
 - (ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations), and
- (b) loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment.

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

Duty of an employee or any person undertaking an activity:

Any person engaged as an employee or undertaking an activity with regard to Buildings 2C and 2D will, immediately after becoming aware of any potential incident (even if outside of normal business hours), notify the Contractor's Project Manager who will notify the Environmental Consultant of the incident and all relevant information about it. The Contractor's Project Manager will be available 24 hours a day, seven (7) days a week and will have the authority to stop or direct works.

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

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

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

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

Table 6 lists the contact details for these authorities. The person reporting the pollution incident will provide the following key details:

- Location of the pollution incident/emergency;
- Nature of the pollution incident/emergency;
- Their name and contact details; and



Details of any required assistance.

Table 6 Regulatory Authority Contact List

Regulatory Authority / Stakeholder	Key Contact	Contact Details		
Department of Planning, Industry and Environment (DPE)	Compliance Unit	1300 305 695 or 02 9228 6111 compliance@planning.nsw.gov.au		
Environment Protection Authority (EPA)	Environment Line	131 555 info@environment.nsw.gov.au		
Authority (El A)	Head office (Sydney)	02 9995 5000		
Penrith City Council	Main switchboard	02 4732 777 council@penrith.city		
Water NSW	Main switchboard	1300 662 077 Customer.Helpdesk@waternsw.com.au		
water NSW	Incident Notification Number – 24 hours	1800 061 069		
NSW Public Health Unit	Sydney Local Health District	Business hours: 1300 066 055 After hours: 02 9515 6111		
SafeWork NSW	Incident Notification Hotline	131 050 Select Option 3 to report a "Serious Incident or Fatality" – this will result in the incident being recorded and the appropriate person being contacted.		
Emergency Services	NSW Police NSW Fire and Rescue NSW Ambulance Service	131 444 1300 729 579 -	In case of emergency – 000	

In accordance with Condition C7 of Development Consent SSD 9794683, once Goodman becomes aware of an incident Goodman is required to immediately (within 24 hours) to provide a written incident notification via the Major Projects website to the DPE and other relevant agencies of an incident, or potential incident, that causes (or may cause) harm to the environment. A detailed incident report is then to be provided to the DPE within 30 days of the incident.

3.5.3.2 Non-Compliances

In accordance with Condition C8 of SSD 9794683, the DPE will be notified in writing via the Major Projects website within seven (7) days of becoming aware of any non-compliance.

C9 and C10 of SSD 9794683 states a non-compliance notification will identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.



3.5.4 Incidents and Non-Compliance Handling Procedure

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

1. Preventative Action

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

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

2. Assistance

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

Contacting Fire and Rescue NSW does not negate the notification requirements in Section 3.5.3.

3. Notify

Under the provisions of the POEO Act, there is a duty to notify any incident that has caused or threatens to cause material harm to the environment and all relevant information about the incident. The specific duties to notify are outlined above in **Section 3.5.3**.

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

Condition C7 and Appendix 4 of Development Consent SSD 9794683 require that the DPE and other relevant authorities be provided with a written incident notification via email within 24 hours after the incident.

A written notification will:

- Identify the development and application number;
- Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
- Identify how the incident was detected;
- Identify when the Applicant 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; and
- Identify a project contact for further communication regarding the incident.

Non-compliances will be notified in accordance with **Section 3.5.3.2**.



4. Investigate

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

5. Remedial Action

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

6. Record

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

Condition C7 and Appendix 4 of Development Consent SSD 9794683 requires that a detailed incident report be provided to the DPE within 30 days of the incident occurring.

The Incident Report will 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, or will be, implemented to address the incident and prevent recurrence; and
- Details of any communication with other stakeholders regarding the incident.

All non-compliances are recorded in accordance with Condition C9 of SSD 9794683.

7. Preventative Action

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

3.5.5 Incidents and Non-Compliance Register

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

- A copy of the environmental incident and non-compliance notification requirements and handling procedure contained above in Section 3.5.3 and 3.5.4;
- Site evacuation procedures;
- A separate reference sheet containing the contact details for the contacts listed in **Table 3** and the contact details for the regulatory authorities listed in **Table 5**;
- Blank hard copies of Prime Constructions Incident Report Form; and
- Copies of all completed Incident Report Forms, which are to be maintained for at least five years after the event to which they relate.



3.5.6 Minor Environmental Incidents

There is the possibility of minor environmental incidents occurring as part of this project. SLR have defined a 'Minor Environmental Incident' as an incident where there has been no potential or actual material harm to the environment (see 'material harm' definition outlined in **Section 3.5.3**). Examples may include excessive dust impacts sighted by the project team or a small contained hydrocarbon spill that does not leave a site boundary and are cleaned up without residual on-site environmental harm (RMS 2018).

Minor environmental incidents will still be handled under the process outlined in **Section 3.5.4** except there will be no requirement for government notification. All minor or major incidents will be recorded in the Incidents Register, with details of the events also included in Oakdale West's Environmental Representative Monthly Report. A minor incident does not constitute a non-compliance with the Development Consent.

3.6 Complaints Response and Handling Procedure

All complaints will be handled in accordance with the sections below and the *Oakdale West Community Communication Strategy* (CCS) (SLR 2022b) (see **Appendix F**).

3.6.1 Performance Objective

To ensure that all environmental complaints in relation to the construction of Buildings 2C and 2D at Oakdale West are promptly and effectively received, handled and addressed.

3.6.2 Responsibility

The Communications and Community Liaison Representative is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental complaint. The induction and toolbox talks outlined in **Section 3.4** will be used to ensure all site employees are aware of and understand their obligations for complaints response.

All employees who take receipt of a complaint, either verbal or written, are to immediately notify the Contractor's Project Manager, who will then contact the Communications and Community Liaison Representative.

3.6.3 Complaints Handling Procedure

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

1. Record and Acknowledge

Any employee who takes receipt of a complaint, either verbal or written, are to immediately notify the Contractor's Project Manager who will then contact the Communications and Community Liaison Representative. The Contractor's Project Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works. All relevant contact details are available in **Table 3**.

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.



The complainant's name, address and contact details, along with the nature of the complaint, will be requested. If the complainant refuses to supply the requested information, a note will be made on the form and complainant advised of this.

2. Assess and Prioritise

The Communications and Community Liaison Representative will prioritise all complaints by considering the seriousness of the complaint including risk to health and safety and will attempt to provide an immediate response via phone or email. This will be undertaken in accordance with the CCS (SLR 2022b).

3. Investigate

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

If the complaint is due to an incident, the notification requirements and handling procedures outlined in **Section 3.5.3** and **3.5.4** respectively will be followed.

4. Action or Rectify

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

5. Respond to Complainant

The Communications and Community Liaison Representative will oversee the rectification of the issue and respond to the complainant once the issue has been resolved. The complainant will be provided with a follow up verbal response on what action is proposed within two hours during night-time works (between the hours of 6:00 pm and 10:00 pm) and 24 hours at other times. Where a complaint cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant within ten days.

6. Record

It is imperative that an assessment of the situation is carried out and documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded in in the CCS Complaints Register (**Appendix F**). A copy of the completed form will be maintained for at least five years. The complaint will also be recorded in the Complaints Register, as per **Section 3.6.4**.

7. Preventative Action

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



3.6.4 Complaints Register

A Complaints Register will be maintained during construction and will contain the following:

- A copy of the environmental complaint handling procedure contained in Section 3.6.3;
- A separate reference sheet containing the contact details listed in **Table 3**, provided in **Appendix F**;
- Copies of all completed Complaint Forms which are to be maintained for at least five years after the event to which they relate.

3.7 Dispute Resolution

In the event that a dispute arises between Goodman and Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the construction of Buildings 2C and 2D at Oakdale West, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's determination of any such dispute will be final and binding on the parties.

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

Additional information can be located in the CCS (SLR 2022b) attached as Appendix F.



4 Environmental Management Commitments

Environmental aspects with the potential to be impacted through the construction of Buildings 2C and 2D are addressed in the following sub-sections. These issues have specific regulatory requirements imposed and/or are considered to have the highest potential to result in a non-compliance with a legislative requirement or generate community complaints. The tables in this section are a compliance management tool outlining how controls are to be implemented.

4.1 General

Table 7 lists the general environmental controls that will be implemented throughout the construction of Buildings 2C and 2D to minimise the potential for adverse impacts on the local environmental and surrounding receptors.

Table 7 General Construction Environmental Management Controls

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
All reasonable and feasible measures will be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from construction.	Prime Constructions	Ongoing	SSD 9794683 Condition A1
The total area of warehousing and office space at the development must not exceed a maximum gross lettable area of 10,565m2 for Building 2C and 6,235m2 for Building 2D.	Prime Constructions	Ongoing	SSD 9794683 Condition A6
New buildings will be constructed in accordance with the relevant BCA requirements.	Prime Constructions	Ongoing	SSD 9794683 Condition A17 and A21
All relevant approvals from service providers will be obtained before the construction of any utility works.	Prime Constructions	Prior to commencing construction and ongoing	SSD 9794683 Condition A24
All monitoring records will be maintained to demonstrate compliance with the CEMP, including:	Prime Constructions		
Site environmental inspection reports			
Environmental monitoring data			
Internal and external audit reports		For 5 years after	Best practice
 Reports of environmental incidents, environmental, associated actions taken, and follow-up actions 		completion date	
Minutes of management review meetings			
Induction and training records			



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Construction employees and contractors will be suitably inducted and trained prior to commencing any work on site.	Prime Constructions	Prior to commencing construction and ongoing	CEMP Section 3.4
The incidents and complaints management strategies contained within Sections 3.5 and 3.6 will be implemented to ensure that any incidents and/or complaints relating to the construction activities are promptly and effectively addressed.	Prime Constructions	Ongoing	CEMP Sections 3.5 and 3.6
All licences, permits, approvals and consents as required by law will be obtained and maintained as required for the development.	Prime Constructions	Prior to commencing construction	SSD 9794683 Condition AN1



4.2 Noise

Construction noise relating to Buildings 2C and 2D works will be managed in accordance with the CNVMP (SLR 2022a) prepared to support this CEMP, attached as **Appendix G**.

Table 8 outlines the project specific Noise Management Levels (NMLs) to be adhered to during construction as outlined in the CNVMP (SLR 2022a).

Table 8 Project Specific Construction Noise Management Levels

Receiver	Period	LAeq,15min Construction NMLs (dBA)		
		Standard Hours	Highly Noise Affected	
N1, N7 & N8	Day	49	75	
N9 – N14	Day	44	75	
N2 & N6	Day	55 ¹	n/a	

Note 1: Noise level of LAeq 55 dBA has been adopted, with consideration to the generally accepted 10 dB noise reduction typically achieved through a partially open window.

It is understood that a Noise Agreement between the applicant and receiver N3, N4 and N5 has been made. As such, no criteria are applicable at receivers N3, N4 and N5.

The environmental management controls in **Table 9** will be implemented to minimise the potential for adverse noise emissions from the construction of Buildings 2C and 2D.

Table 9 Environmental Management Controls for Noise

Measure	Person Responsible	Timing / Frequency	Reference / Notes
Project Planning			
Less noise and vibration intensive construction techniques for rock breaking and concrete sawing will be used.			į
Works will be completed during standard daytime construction hours outlined in Section 2.3 .	Prime Constructions	Ongoing	CNVMP / Best practice
Truck routes to site will be in accordance with the approved Construction Traffic Management Plan.			
Scheduling			
Respite offers will be considered where high-noise works are predicted to exceed 75 dBA for residential receivers. Respite offers will be considered for high-vibration works where the works are undertaken within the human comfort minimum working distances for all receiver types. Consultation with these receivers will be undertaken to determine appropriate respite periods, such as exam periods for schools.	Communications and Community Liaison Representative	Ongoing	CNVMP / Best practice



Measure	Person Responsible	Timing / Frequency	Reference / Notes
Duration respite will be considered where it may be beneficial to the sensitive receivers to increase the duration of blocks of work or number of consecutive periods in order to complete the works more quickly. The project team will engage with the community where Duration Respite is considered in accordance with the CCS.	Communications and Community Liaison Representative	Ongoing	CNVMP / Best practice
Notification detailing work activities, dates and hours, impacts and mitigation measures, indication of work schedule over the night time period, any operational noise benefits from the works (where applicable) and contact telephone numbers will be undertaken in accordance with the CCS.			
Site Layout			
Compounds and worksites will be designed to promote one-way traffic and minimise the need for vehicle reversing.			
Where practicable, work compounds, parking areas, and equipment and material stockpiles will be positioned away from noise-sensitive locations and take advantage of existing screening from local topography.	Prime Constructions	Ongoing	CNVMP / Best practice
Equipment that is noisy will be started away from sensitive receivers			
Training			
Training will be provided to all personnel on noise and vibration requirements for the project. Inductions and toolbox talks to be used to inform personnel of the location and sensitivity of surrounding receivers.	Prime Constructions	Ongoing	CNVMP / Best practice
Plant and Equipment Source Mitigation			
All construction plant and equipment used on site, or to monitor the performance of the development, must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.	Prime Constructions	Ongoing	SSD 9794683 Condition A20
Where practicable, tonal reversing alarms (beepers) will be replaced with non-tonal alarms (squawkers) on all equipment in use (subject to occupational health and safety requirements).	Prime		
Noisy equipment will be sited behind structures that act as barriers, or at the greatest distance from the noise-sensitive area; or orienting the equipment so that noise emissions are directed away from any sensitive areas, to achieve the maximum attenuation of noise.	Constructions	Ongoing	Best practice



Measure	Person Responsible	Timing / Frequency	Reference / Notes
Noise generating equipment will be regularly checked and effectively maintained, including checking of hatches/enclosures regularly to ensure that seals are in good condition and doors close properly against seals.			
Dropping materials from a height will be avoided.			
Loading and unloading will be carried out away from noise sensitive areas, where practicable.	Prime Constructions	Ongoing	Best practice
Trucks will not queue outside residential properties. Truck drivers will avoid compression braking as far as practicable.			
Truck movements will be kept to a minimum, ie trucks are fully loaded on each trip.			
Community Consultation			
Notifications will be provided to the affected community where high impacts are anticipated or where out of hours works are required. Notification will be a minimum of 24 hours. Refer to the CCS.	Communications and Community	Ongoing	CNVMP / Best practice
Where complaints are received, work practices will be reviewed and feasible and reasonable practices implemented to minimise any further impacts. Refer to Section 3.6.	Liaison Representative		
Monitoring			
Noise and/or vibration monitoring will be conducted (as appropriate) when noise/vibration intensive works are being undertaken in close proximity to sensitive receivers.			
Noise and/or vibration monitoring will be conducted (as appropriate) in response to any complaints received to verify that levels are not substantially above the predicted levels.	Prime Constructions	Ongoing	CNVMP / Best practice
Refer to Section 5 for full details of monitoring requirements.			
Roles and Responsibilities			
All personnel will be made aware of their role and responsibilities to comply with the CNVMP.	Prime Constructions	Ongoing	CVNMP Section 10



4.3 Vibration

Vibration during the construction of Buildings 2C and 2D will be managed in accordance with the CNVMP (SLR 2022a) prepared to adhere to best practice standards, and attached as **Appendix G**.

The vibration dose values (VDVs) recommended in the EPA's Assessing Vibration: a technical guideline (2006) for vibration of an intermittent nature are listed in **Table 10**.

Table 10 Acceptable Vibration Dose Values for Intermittent Vibration

Location	Daytime ¹		Night-time ¹	
Location	Preferred Value	Maximum Value	Preferred Value	Maximum Value
Residences	0.20	0.40	0.13	0.26
Offices, schools, educational institutions and places of worship	0.40	0.80	0.40	0.80
Workshops	0.80	1.60	0.80	1.60

Note 1: Daytime is 7:00 am to 10:00 pm and night-time is 10:00 pm to 7:00 am.

The recommended safe working distances for vibration intensive construction plant are listed in **Table 11**. These recommendations are for the practical management of potential vibration to minimise the likelihood of cosmetic damage to buildings and disturbance or annoyance in humans.

Table 11 Recommended Safe Working Distances for Vibration Intensive Plant

		Minimum Distance			
Plant Item	Rating / Description	Cosmetic	Human		
	, , , , , , , , , , , , , , , , , , , ,	Residential and Light Commercial (BS 7385) ¹	Heritage Items (DIN 4150 Group 3) ²	Response (NSW EPA Guideline) ¹	
	< 50 kN (Typically 1-2t)	5 m	11 m	15 m to 20 m	
	< 100 kN (Typically 2-4t)	6 m	13 m	20 m	
Vibratory Dollar	< 200 kN (Typically 4-6t)	12 m	15 m	40 m	
Vibratory Roller	< 300 kN (Typically 7-13t)	15 m	31 m	100 m	
	> 300 kN (Typically 13-18t)	20 m	40 m	100 m	
	> 300 kN (Typically > 18t)	25 m	50 m	100 m	
Small Hydraulic Hammer	300 kg – 5 to 12t excavator	2 m	5 m	7 m	
Medium Hydraulic Hammer	900 kg – 12 to 18t excavator	7 m	15 m	23 m	
Large Hydraulic Hammer	1600 kg – 18 to 34t excavator	22 m	44 m	73 m	
Vibratory Pile Driver	Sheet piles	2 m to 20 m	5 m to 40 m	20 m	
Pile Boring	≤ 800 mm	2 m (nominal)	5 m	4 m	
Jackhammer	Hand held	1 m (nominal)	3 m	2 m	

Note 1: Criteria reference from Roads and Maritime CNVG.

Note 2: Criteria reference from DIN 4150.

The environmental management controls in **Table 12** will be implemented to minimise the potential for adverse vibration impacts from the construction of Buildings 2C and 2D.

 Table 12
 Environmental Management Controls for Vibration

Measure	Person Responsible	Timing / Frequency	Reference / Notes
Vibration			
Where works are required within the minimum working distances, vibration monitoring will be undertaken to confirm that vibration is within acceptable levels.		Ongoing	
Where there is a risk that vibration activities may cause damage to nearby structures and buildings or if these are located within the minimum working distance from the construction activity, a building condition inspection will be undertaken at least three weeks before the construction activity commences.			
The Building Condition Inspection Reports will contain photographs of the inspected properties and include details of the inspectors' qualification and expertise, together with a list of any identified defects, where relevant. The reports will be submitted to the owner of each property and to Goodman before the commencement of any vibration intensive activities.	Prime Constructions	Before and after any vibration activities within minimum distances	CNVMP / Best practice
A copy of the Building Condition Inspection Reports and CNVMP will be submitted to Goodman at least 10 working days prior to commencement of piling, excavation by hammering or ripping, compaction, demolition operations, or any activity which may cause damage through vibration.			



4.4 Air Quality

Construction air quality will be managed in accordance with the CAQMP (SLR 2022) prepared to support this CEMP, attached as **Appendix H**.

The CAQMP will be implemented during the construction of Buildings 2C and 2D at Oakdale West to ensure that acceptable levels of amenity are maintained for surrounding residents and the relevant ambient air quality criteria are complied with for particulate matter at surrounding receptor locations.

The environmental controls in **Table 13** will be implemented to minimise the potential for adverse dust emissions and impacts during the construction.

Note: **Table 13** is replicated as Table 7 in the CAQMP.

Table 13 Environmental Management Controls for Air Quality

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Communications			
The Community Communications Strategy will be implemented.	Communications and Community Liaison Representative		Best practice
The name and contact details of person(s) accountable for air quality and dust issues will be displayed on the site boundary. This may be the Contractor's Project Manager.	Prime Constructions	Prior to commencing construction and ongoing	
The head or regional office contact information will be displayed on site signage.			
Site Management			
All dust and air quality incidents will be undertaken as per Section 3.5 of the CEMP.			CEMP Section 3.5
All dust and air quality complaints will be undertaken as per Section 3.6 of the CEMP.		Ongoing	CEMP Section 3.6
Where excessive dust events occur (i.e. prolonged visual dust in a particular area), additional watering of dust producing activities will be undertaken or activities temporarily halted until such times that the dust source is under control.	Prime Constructions	During excessive dust events	Best practice
Horsley Park Bureau of Meteorology station weather forecast will be reviewed daily (i.e. wind, rain) to inform site dust management procedures for the day.		Daily	
Preparing and Maintaining the Site			
All reasonable steps to minimise dust generated will be undertaken during construction.	Prime Constructions	Ongoing	SSD 7348 Condition D98 SSD 9794683 Condition B30



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Exposed surfaces and stockpile will be suppressed by regular watering or use of approved dust suppressants.	Prime Constructions	Ongoing	SSD 7348 Condition D99a
Land stabilisation works will be carried out in such a way on site to minimise exposed surfaces.			SSD 7348 Condition D99e
Construction will not cause or permit the emission of any offensive odour, as defined in the POEO Act.			SSD 7348 Condition D102
Dust generating activities in areas close to receptors will be closely monitored and additional mitigation applied as required to best manage potential dust emissions	Prime Constructions	Ongoing	
Stockpiles that will be in place for more than 20 days and are not actively used as well as any stockpiles that are susceptible to wind or water erosion will be suitably protected from erosion within 10 days of the establishment of each stockpile.	Prime Constructions	Oligoliig	Best practice
Temporary stabilisation of disturbed surfaces will be undertaken within two weeks of the stockpile being established.			
Site fencing and barriers will be kept clean using wet methods.			
Operating Vehicle/Machinery and Sustainable Travel			
Trucks associated with Stage 1 will not track dirt off site and onto the public road network.			SSD 7348 Condition D99c
Project access roads used by delivery trucks will be kept clean.			SSD 7348 Condition D99d
All on-road vehicles will comply with relevant vehicle emission standards (prescribed by the NSW RMS), where applicable, and will be maintained in good condition, in accordance with manufacturer's specifications and POEO Act.	Prime Constructions	Ongoing	
Delivery trucks will switch off engines whilst undertaking a delivery on-site, if idling time is likely to exceed 5 minutes.			Best practice
Vehicle speed limit restrictions are implemented on site, including:			
General - 20km/h			
High risk area - 10km/hHaul routes - 50 km/h			



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Truck queuing and unnecessary trips will be minimised through logistical planning and by the identification and use of specific park up/hold areas away from the Project.	Prime Constructions		
Operations			
Only cutting, grinding or sawing equipment fitted with suitable dust suppression systems, such as water sprays will be used.			
Adequate water supply will be available on the site for effective dust/particulate matter suppression/ mitigation using a combination of potable and non-potable water sources.	Prime Constructions	Ongoing	Best practice
Water carts will be used on all denuded or exposed surfaces and unsealed roads to minimise dust emissions.	Prime Constructions		
Equipment, inclusive of, but not limited to Environmental spill kits will be readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.		Ongoing	Best practice
Works will be assessed during strong winds or in weather conditions where high levels of airborne particulates may potentially impact the sensitive receivers.		Continuously and during	
Continual monitoring of wind speed and direction will be undertaken to guide this decision and ensure that adequate mitigation measures are undertaken		high winds	
Waste Management			
All trucks entering or leaving the Site will have their loads covered.	Prime Constructions	Ongoing	SSD 7348 Condition D99b
No waste materials, timbers or any other combustible materials will be burnt on site.			Best practice
Earthworks			
Scopes of work will be planned in such a way to assist in minimising the duration that surfaces are left denuded.		Ongoing	
Rehabilitation of disturbed surfaces will be undertaken within 20 days of final construction levels.	Prime Constructions	Within 20 days of final construction levels	Best practice



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
If unanticipated strong odours or significant visual dust emissions are noted or observed on site, an investigation will be undertaken by the Prime Constructions Project Manager to identify the scope of work or source of the emission prior to undertaking and applying any additional mitigation measures.		Ongoing	
Construction			
Sand and other aggregates will not be allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	Prime Constructions	Ongoing	Best practice
Trackout			
Water-assisted road sweeper(s) will be used on an as required basis should any material be tracked out of the site.			
Record all regular inspections and maintenance undertaken of site haul routes and project related access roads in a site log book.	Prime Constructions	Ongoing	Best practice
A wheel washing system and/or cattle grid system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site) will be implemented.			
Demolition			
Ensure effective water suppression of dust is used during demolition operations.	Drimo Constructions	Ongoing	Doct proctice
Bag and remove any biological debris or damp down such material before demolition.	Prime Constructions	Ongoing	Best practice



4.5 Traffic

Construction traffic will be managed in accordance with the Construction Traffic Management Plan (CTMP) (Ason 2022) prepared to support this CEMP and is attached as **Appendix I**.

The CTMP seeks to minimise traffic impacts on the surrounding road network, ensure safety and efficiency for workers, pedestrians and other road users, and provide information regarding the construction vehicle access routes and any changed road conditions.

The anticipated vehicle movements generated by the construction of the Site have been estimated having consideration of the likely requirements for construction staff, plant, equipment and haulage. The anticipated construction schedule has been provided by the contractor, with the estimated traffic volumes are as follows:

• Buildings 2C and 2D Construction Works – up to 120 light vehicle movements per day and 600 heavy vehicle movements per day (including truck and dog and 3 tonne rigid trucks) shall access the Site, although not in the same time period per day. Notwithstanding the estimated maximum daily construction vehicle generation is up to 180 vehicle movements per day. See Section 4.1.2 of the CTMP for further details.

The environmental management controls in **Table 14** will be implemented to ensure road safety and network efficiency during construction.

Table 14 Environmental Management Controls for Traffic

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Emergency vehicle access to and from the Site will be available at all times while the site is occupied by construction activities.	Drivers / Prime Constructions	Ongoing	CTMP Section 2.3
Drivers will not use Bakers Lane for access to and from the Site.	Drivers / Prime Constructions	Ongoing	CTMP Section 2.3, 4.1.3 and 5.2
All construction vehicles will access the site via Compass Drive, the Link Road, and Emporium Ave and Sepia Rd as shown in Figure 4.	Drivers / 'Prime Constructions	Ongoing	CTMP Section 3.1
Any TGS shall maintain a suitable level of access past work areas for pedestrians or cyclists at all times.	Prime Constructions	Ongoing	CTMP Section 3.2
A bus route is available from St Marys Train Station to Oakdale West Estate for additional access for construction workers.	Prime Constructions	Ongoing	CTMP Section 3.3
A schedule for deliveries of materials and goods will be established on the previous day, and Traffic Controllers will maintain radio contact with construction vehicles at all times.	Prime Constructions		СТМР
At no stage will queueing occur on the public road network. In the event that vehicles are required to use a layover prior to arrival at site, they will laydown within Compass Drive before arriving to site in order to avoid any on-street queuing.		Ongoing	Section 4.1.3



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Future contractors shall prepare Vehicle Movement Plans (VMP) for on-site circulation for key stages generating more than 60 truck movements (30 in, 30 out) per day, as per Section 4.1.3 of the CTMP.		As required	CTMP Section 4.1.3
Contractors shall nominate the parking zones without obstructing any vehicle manoeuvre routes. The location of Contractor parking lots are expected to change as construction continues and encompasses various portions of the Site.			
Vehicles will be tracked upon entry and exit of the Site's access to ensure that vehicles are abiding by both the timed restrictions and construction volume constraints.			CTMP Section 4.2.3
All material loading will occur within the construction site boundary.			
No loading will occur outside of the provisioned areas		Ongoing	
Equipment, materials and waste will be kept within the construction site boundary.		0.180.118	
During latter stages of construction, tie in works will be required within the kerbside of Emporium Avenue and Sepia Road. All materials handling shall be undertaken off the public roadway, however in the event materials handling are required from the roadway, then prior approval shall be sought and obtained from the relevant Authorities. Noting that Estate Roads are currently in private ownership, this would require consent of the Estate Management and be subject to special management.	Prime Constructions		CTMP Section 4.2.4
An application to Council will be submitted in the event that any special or discreet work activities require the use of kerbside parking for the purposes of a Works Zone.		As required	CTMP Section 4.2.5
Temporary exclusion fencing will be erected along the entire boundary of the site and will be maintained for the duration of the construction program. The fencing is to ensure unauthorised persons are kept out of the Site.		Prior to commencing construction and	CTMP Section 4.2.6
Site access gates would be provided within Emporium Avenue and Sepia Road and will be closed at all times outside of the permitted construction hours		ongoing	Section 4.2.6
Pedestrians and cyclists using the footpath fronting the Site are to be managed using pedestrian boom gates or equivalent, as outlined in Section 4.2.7 of the CTMP.		Ongoing	CTMP Section 4.2.7
Chain mesh construction fencing will be provided along all site frontages accessible by the public to prevent unwanted pedestrian and/or cyclist access.		Prior to commencing construction and ongoing	CTMP Section 4.2.7



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Any Signage and/or line marking to be installed as a result of these construction works shall be installed as per Council's Engineering Construction Specification For Civil Works document (October 2017).	Prime Constructions	Ongoing	CTMP Section 4.2.8
Traffic Guidance Schemes (TGSs) will be prepared, approved and updated in accordance with Section 4.2.9 of the CTMP.	Prime Constructions		CTMP Section 4.2.9
Safety to motorists and pedestrians throughout the area will be maintained during construction through the preparation and execution of TGS's, which will be monitored and updated accordingly throughout the project.	through the preparation Constructions be monitored and		CTMP Section 6.2
All drivers will adhere to the Driver Code of Conduct and Responsibilities outlined in Section 5 of the CTMP.	Prime Constructions		CTMP Section 4.2.1 Section 5
Drivers are to be issued with a copy of the Drivers Code of Conduct if driving any vehicle for work-related purposes.	Prime Constructions		CTMP Section 5.2 and 5.3
Management will take all steps necessary to ensure company vehicles are as safe as possible, in accordance with Section 5.4 of the CTMP.	Prime Constructions	Ongoing	CTMP Section 5.4
If a vehicle crash or incident occurs, the procedure outlined in Section 5.5 of the CTMP will be followed.	Prime Constructions	Following a vehicle crash or incident	CTMP Section 5.5
The environmental mitigation measures outlined in Section 5.6 will be adhered to.	Prime Constructions	Ongoing	CTMP Section 5.6
Noting that construction works for the remainder of the OWE infrastructure and Building works will still be underway, each contractor shall liaise regularly in order to avoid any conflict of large deliveries and to ensure that the cumulative construction impacts are minimised and do not exceed approved operational limits.	Prime Constructions	Ongoing	CTMP Section 6.3
The CTMP will be reviewed in accordance with Section 7.1 of the CTMP.	Prime Constructions	Monthly, at minimum	CTMP Section 7.1



4.6 Soil and Water

The following documents have been prepared to ensure appropriate soil and water management during the construction of Buildings 2C and 2D:

- Soil and Water Management Plan (SWMP) (Rubicon Enviro 2022) attached as Appendix J. The SWMP aims
 to ensure appropriate controls and procedures are implemented during construction activities to avoid or
 minimise erosion and sedimentation impacts and potential impacts to water quality in creeks, waterways
 and groundwater along the project corridor.
- Erosion and Sediment Control Plan (ESCP) (Rubicon Enviro 2022a) attached as Appendix Ja. The ESCP aims
 to reduce the potential for risk of environmental impacts caused by erosion and sedimentation associated
 with project activities.

While these documents should be referred to for specifics, the environmental management controls are summarised in **Table 15**.

Table 15 Environmental Management Controls for Water and Soil

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
General			
Construction will comply with section 120 of the POEO Act, which prohibits the pollution of waters.	Prime Constructions	Ongoing	SSD 9794683 Condition B19
Planning, permits and personnel for soil and water management activities and controls will be managed as per Table 9 in the ESCP.		Ongoing	ESCP Section 9
Training will be provided to all project personnel, including relevant subcontractors on sound erosion and sediment control practices and the requirements from this plan through inductions, toolbox talks and pre-start briefings.		Pre-construction / Ongoing	SWMP Section 6
A Project Soil Conservationist (Certified Professional in Erosion & Sediment Control - CPESC) will be engaged and consulted throughout construction to provide advice and review SWMP preparation, erosion and sediment control design, installation, maintenance and the development of Progressive Erosion and Sediment Control Plans (PESCPs).	Prime Constructions	Pre-construction / Ongoing	SSD 7348 Condition D80(a) SWMP Section 6



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Environmental Work Method Statements (EWMSs) may be required to be prepared and implemented to manage soil and water impacts for activities assessed as having high environmental risk (see SWMP Section 6 (SW3) for further examples of these activity types).		Ongoing	SWMP Section 6
Contaminated soils and Acid Sulfate Soils and / or Potential Acid Sulfate Soils are to be managed in accordance with the ESCP (see Appendix Ja).		Pre-construction / Ongoing	SWMP Section 6
Erosion and Sediment Control			
The Primary ESCP, prepared by the Soil Conservationist (CPESC) includes arrangements for managing wet weather events, including monitoring of potential high-risk events (such as storms) and specific controls and follow-up measures to be applied in wet weather. The ESCP is to be referred to and considered when preparing progressive erosion and sediment control plans.	Prime Constructions / Project Soil Conservationist	Pre-construction / Ongoing	SSD 7348 Condition D80(a) SWMP Section 6 (SW5) ESCP Appendix E
Progressive Erosion and Sediment Control Plans (PESCPs) will be prepared and implemented in advance of construction. PESCPs will be updated as required.	Prime Constructions / Project Soil Conservationist	Pre-construction / Ongoing	SSD 7348 Condition D81 SWMP Section 6 (SW6) ESCP Section 7.4 and 7.5 ESCP Appendix F
Prior to the commencement of any construction or other surface disturbance for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction – Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan (Appendix Ja) included in the CEMP required by condition C2.	Goodman / Prime Constructions	Prior to construction / Construction	SSD 9794683 Condition B18 SWMP Section 6 (SW7)
Erosion and sediment controls for the site will be implemented in accordance with Section 6 of the SWMP (SW8-SW14).	Prime Constructions	Pre-construction / Ongoing	SSD 7348 Condition D80(c) SWMP Section 6



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Key management strategies to mitigate potential erosion and sediment impacts will be followed in accordance with Section 7.4 of the ESCP.	Prime Constructions	Ongoing	ESCP Section 7.4
A structured erosion and sediment control training program will be implemented for all relevant site personnel in the form of inductions, toolbox talks and workshops / training presentations.	Prime Constructions	Ongoing	ESCP Section 7.4 and Section 7.6
A thorough inspection and maintenance program will be developed to monitor, record and schedule actions for maintenance and upgrades of controls, rectification works, and sediment removal and handling.	Prime Constructions	Ongoing	ESCP Section 7.4
A procedure will be established to monitor forecast weather events and implementing response plans for significant wind or rainfall events and flooding.	Prime Constructions	Ongoing	and Section 7.7
Timely and progressive stabilisation will be undertaken of disturbed areas prior to final landscaping.	Prime Constructions	Ongoing	ESCP Section 7.4
Stabilisation measures will be monitored, and prompt and effective revegetation and permanent stabilisation promoted.	Prime Constructions	Ongoing	and Section 9
The erosion and sediment control measures required for Project areas during the various construction areas will be determined by reference to the guidance and measures detailed in Appendix D of the 'Blue Book' Volume 2D: Main Road Construction 2007. Commonly employed methods and techniques that may be likely to be utilised on the Project are detailed in Table 9 of the ESCP.	Prime Constructions	Ongoing	ESCP Section 7.4 and Section 9
The ESCP is based on the assumption that controls will generally be installed in the progression outlined in Section 8 of the ESCP	Prime Constructions	Ongoing	ESCP Section 8



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Sediment and Pollution Controls for soil and water management activities will be managed as per Table 9 in the ESCP.	Prime Constructions	Pre-construction / Ongoing	ESCP Section 9
Stockpiles			
Stockpiles will be managed in accordance with Section 6 of the SWMP.	Prime Constructions	Pre-construction / Ongoing	SSD 7348 Condition D80(c) SWMP Section 6 (SW15)
Clearing, site establishment, topsoil stripping and stockpiling will be managed as per Table 9 in the ESCP	Prime Constructions	Pre-construction / Ongoing	ESCP Section 9
Sediment Basins			
Sediment basins will be designed and managed in accordance with Section 6 of the SWMP (SW16-SW28).	Prime Constructions	Pre-construction / Ongoing	SSD 7348 Condition D81 & D82 SWMP Section 6
A sediment basin management register will be maintained for each sediment basin that records; • personnel approving the dewatering activities; • time & date; • water quality test results and estimated volumes for each discharge.	Prime Constructions	Ongoing	SWMP Section 6 ESCP Appendix D
The Sediment Basin Management and Dewatering Procedure will be referred to for actions to be taken for site dewatering in general and specific measures for the construction and maintenance of sediment basins including steps to be taken prior to any discharge.	Prime Constructions	Ongoing	ESCP Appendix C
Dewatering			
Dewatering activities will be managed in accordance with Section 6 of the SWMP (SW25-SW29).	Prime Constructions	Ongoing	SSD 7348 Condition D81 & D82 SWMP Section 6 ESCP Appendix C
Drainage and water management will be managed as per Table 9 in the ESCP.	Prime Constructions	Ongoing	ESCP Section 9



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Site stabilisation and restoration			
Site stabilisation and restoration activities will be managed in accordance with Section 6 of the SWMP (SW30-SW32).	Prime Constructions	Ongoing / Post Construction	SSD 7348 Condition D80(c) SWMP Section 6
Spill prevention and response			
Spill prevention and response will be managed in accordance with Section 6 of the SWMP (SW30-SW32).	Prime Constructions	Ongoing	SSD 7348 Condition D82 and D109-D110 SWMP Section 6



4.7 Waste

Construction waste will be managed in accordance with the Waste Management Plan (WMP) (SLR 2022d) prepared to support the EIS and attached as **Appendix K**.

The environmental management controls in **Table 16** will be implemented to minimise the potential for adverse waste impacts from the construction of Buildings 2C and 2D.

Table 16 Environmental Management Controls for Waste

Paparting Paguingment		Timing /	References /
Reporting Requirement	Person Responsible	Frequency	Notes
Waste must be secured and maintained within designated waste storage areas and must not leave the site onto neighbouring public or private properties.	Prime Constructions		SSD 9794683 Condition B34
All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.			SSD 9794683 Condition B36
The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.			SSD 9794683 Condition B37
Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal.			SSD 9794683 Condition B38
Waste avoidance and minimisation measures from the WMP will be implemented to meet construction waste recycling and landfill reduction targets.		Ongoing	WMP Section 5
Suitable measures will be implemented to manage pests, vermin and declared noxious weeds on the Site.			
The Site will be inspected on a regular basis to ensure that the pest/weed/vermin measures are working effectively, and that they are not present on Site in sufficient numbers to pose an environmental hazard or cause the loss of amenity in the surrounding area.			Best Practice
Waste Avoidance In accordance with Council's Development Control Plan (DCP) and better practice waste management waste avoidance measures listed in the WMP should be followed.			WMP Section 5.5



Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
Reuse, Recycling and Disposal In accordance with Council's DCP and better practice waste management waste reuse, recycling and disposal measures listed in the WMP should be followed.			WMP Section 5.6
Waste Storage and Servicing In accordance with Council's DCP and better practice waste management waste reuse, recycling and disposal measures listed in the WMP should be followed.	Prime Constructions		WMP Section 5.7
All staff, including sub-contractors and labourers, employed during the site preparation and construction phases of the Project must undergo induction training regarding waste management for the Site.		Ongoing	WMP Section 5.8
Standard signage is to be posted in all waste storage and collection areas. All waste containers should be labelled correctly and clearly to identify stored materials.			WMP Section 5.9
All personnel will be made aware of their role and responsibilities to comply with the WMP.	Prime Constructions	Ongoing	WMP Section 5.11



4.8 Visual Amenity

As outlined in the EIS (Keylan 2021), Buildings 2C and 2D are designed to ensure they will be consistent with surrounding development and the Concept Plan approval for the site (as modified). The proposed design reflects high commercial and industrial standards and provides a visually balanced form.

Potential visual impacts during construction of Stage 3 would include the use of cranes and scaffolding during the erection of Buildings 2C and 2D and temporary infrastructure commonly associated with construction activities such as site compounds and lighting. These visual impacts are considered insignificant given their temporary nature.

Table 17 outlines the mitigation measures to be implemented during construction to manage the impacts to visual amenity.

Table 17 Environmental Management Controls for Visual Amenity

Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
The development must be consistent with the development controls in the OWE, as shown in <i>Table 1: Development Controls</i> in the Conditions of Consent.	Prime Constructions	Ongoing	SSD 9794683 Condition A7
Notwithstanding the controls listed in Table 1 in Condition A7, no warehouse building in the development, except Buildings 2A and 2C in Precinct 2, shall exceed a ridgeline height of 13.7 m, excluding roof mounted mechanical plant and solar panels.		Ongoing	SSD 9794683 Condition A8
The Applicant must construct Buildings 2C and 2D in accordance with and RTS and as shown on the figures in Appendix 1.		Ongoing	SSD 9794683 Condition B13
Lighting will comply with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019)			SSD 9794683
Lighting will be mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.		Prior to commencing construction and ongoing	Condition B16
All signage and fencing will be erected in accordance with the development plans included in the RTS. Note: This condition does not apply to temporary		Unguing	SSD 9794683 Condition B17
construction and safety related signage and fencing. The existing vegetation on the eastern, southern and western boundary will be retained where possible to assist filtering views to the buildings.		Prior to commencing construction and ongoing	EIS, Attachment M
Suitable measures will be implemented to manage pests, vermin and declared noxious weeds on the Site.		Ongoing	Best practice



Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
The Site will be inspected to ensure that these measures are working effectively, and that pests, vermin or noxious weeds are not present on Site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.	Prime	During Environmental	Best
	Constructions	Consultant inspections	practice



4.9 Flora and Fauna

A Flora and Fauna Management Plan (FFMP) has been prepared by Ecologique (2022) and is attached as **Appendix L**. The FFMP outlines mitigation measures relevant to manage potential impacts to biodiversity during both construction and operation.

Table 18 outlines the mitigation measures to be implemented during construction to manage the impacts to flora and fauna.

Table 18 Environmental Management Controls for Flora and Fauna

Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
All contractors will be made aware of potential direct and indirect impacts to native vegetation, fauna and fauna habitat in the site and beyond.	Management / Contractors	Prior to construction and Ongoing	FFMP Section 3.1
Wildlife Protection			
All personnel including contractors will be made aware of the potential to encounter wildlife; through the site induction process.	Management / Contractors	Prior to Construction	FFMP Section 3.2 (FF1)
Vehicle and mobile plant operators shall remain vigilant when entering and exiting the works area, particularly at dusk and dawn;			
Should kangaroos be observed transiting across the entrance/exit to the works area, vehicle/mobile plant is to stop until animals have moved to a safe distance to ensure vehicle/mobile plant strike is prevented; and		Ongoing	FFMP Section 3.2 (FF2)
All on site personnel including contractors are to report any injured or near miss incidents with wildlife.			
Should unexpected fauna be encountered within the works site, the stop works procedure provided in Section 4 of FFMP will be followed.	Management / Contractors	Ongoing	FFMP Section 3.2 (FF3)
Aquatic Ecosystem Protection			
Offsite discharge shall be managed in strict accordance with Erosion & Sediment Control Plans prepared for Lot 2C and 2D;			FFMP Section 3.2 (FF4)
All vehicles, plant and machinery will be kept in good condition and regularly maintained to avoid chemical leaks and/or spills.	Management / Contractors	Ongoing	FFMP Section 3.2 (FF5)
A spill kit should be provided in an easily accessible location in the event that fuel or other contaminant spills occur.			FFMP Section 3.2 (FF6)



Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes	
Weed, Pest Species and Pathogen Management				
 The following hygiene procedures are to be implemented to avoid the introduction and/or spread of soil borne pathogens and weeds: Minimise work during wet/rainy periods; Vehicles, plant and machinery are to be clean and free of soil on arrival to the works area; Truck wash down, rumble grids to be installed and operated to ensure mud, weeds or pathogens are not transported around the region or onto roads; Mud spilt on roads to be immediately removed by a road sweeper. 	Management / Contractors / Employees	Ongoing	FFMP Section 3.2 (FF7)	
Future tenants are to install rodent (electronic or sonar) repellents to minimise prey for snakes	Management / Future tenants	Post construction	FFMP Section 3.2 (FF8)	
Waste management shall ensure the following:				
 All waste placed in skips or bins for disposal or recycling will be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site; Lids on skips or bins are to be kept closed at all times; and Employ adequate environmental management controls to prevent off-site migration of waste materials and contamination from the waste. For example, consideration of slope, drainage, proximity relative to waterways, stormwater outlets and vegetation 	Management / Contractors / Future Tenants	Ongoing	FFMP Section 3.2 (FF9)	
All personnel working on the Project will be inducted on the potential to encounter wildlife within the wider Estate area and also within the works area.	Management / Contractors	Prior to construction / Ongoing	FFMP Section 4	



4.10 Hazardous Goods and Contamination

The environmental controls that will be implemented to minimise the potential for environmental incidents relating to the hazardous goods and contamination are presented in **Table 19.** This includes an Unexpected Finds Protocol - Contamination (AECOM 2022), which has been prepared for Oakdale West to ensure that potentially contaminated material is appropriately managed, attached as **Appendix M**.

Table 19 Environmental Management Controls for Dangerous Goods

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Hazardous Goods			
The quantities of dangerous goods stored and handled at the Site will be below the threshold quantities listed in Hazardous and Offensive Development Application Guidelines - Applying SEPP 33 at all times.	Prime Constructions		SSD 9794683 Condition B28
All chemicals, fuels and oils used on-site will be stored in bunded areas in accordance with relevant Australian Standards and/or the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change 2007).		Ongoing	SSD 9794683 Condition B29
Contaminated or Hazardous Waste Management will be managed in accordance with Section 5.7.4 of the WMP.	Prime Constructions	Ongoing	WMP Section 5.7.4
Any material identified as contaminated will be disposed off site, with the disposal location and results recorded prior to its removal from the site.	Prime Constructions / Environmental Consultant	As required	
The Contractor's Project Manager and the Environmental Consultant will be notified of any suspected or potential contamination exposed during construction activities, and cease all work activities within the vicinity of actual or suspected contaminated land.		Immediately	
Adequate quantities of suitable material will be kept on site to counteract spillage readily available i.e. Emergency spill kits.	Prime	Prior to commencing construction and ongoing	Best practice
Emergency spill kits will be kept on site at all points of transfer for fuels and hydrocarbons, and at all other locations deemed necessary.	Constructions	Prior to commencing construction and ongoing	
Safety Data Sheets (SDS) will be kept in the Site office and/or safety system for any potentially hazardous goods stored and/or used on site.		Ongoing	
The actions specified on the respective SDS will be implemented in the event of a minor chemical or fuel spill.			



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Appropriate signage and spill kits will be maintained at key locations according to the construction schedule.			
All employees and contractors required to use potentially dangerous goods will be appropriately trained in the proper storage, use and handling.	Prime Constructions	Ongoing	Best practice
Any liquid wastes or dangerous goods waste generated by the construction activities (e.g. due to damage or leakage of containment) will be disposed of by a suitably qualified contractor to an appropriately licensed disposal facility.	Prime Constructions	Ongoing	Best practice
Unexpected Finds - Contamination			
Where the contamination is known or an unexpected contamination find has been identified, a Remediation Action Plan (RAP) will be prepared (as required) in accordance with G36 and the UCP (AECOM 2022).			UCP Section 3.1
 In the event that unexpected contamination finds are encountered: Prime Constructions will immediately inform the Project Manager and AECOM. The Project Manager will inform Goodman; Goodman will notify Council. AECOM will inspect the unexpected find (if required). 			UCP Section 3.1
In the event that fragments of Asbestos Containing Materials (ACM) are identified during the earthworks, works will cease and the procedure outlined in Section 3.3 of the UCP will be implemented.	Prime Constructions / Project Manager /	As required	UCP Section 3.3
In the event that burial pits relating to the former grazing activities are exposed, works will cease in that area and the procedure outlined in Section 3.4 of the UCP will be implemented.	AECOM		UCP Section 3.4
In the event that other contaminated materials are identified during the earthworks, works will cease and the procedure outlined in Section 3.5 of the UCP will be implemented.			UCP Section 3.5
Should unexpected contamination finds require remediation, the works will be undertaken in accordance with <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> Chapter 4 – Remediation of Land.			Consultation with Council
Should unexpected contamination finds require remediation, Council will be notified for Category 1 works.			Consultation with Council
A Materials Tracking Plan (MTP) will be developed and implemented in accordance with Section 4 of the UCP.	Prime Constructions	Ongoing	UCP Section 4



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
AECOM will prepare a Validation Report in accordance with the requirements of the NSW OEH (2011) <i>Guidelines for Consultants Reporting on Contaminated Sites</i> and EPA (2017) <i>Guidelines for the NSW Site Auditor Scheme (3rd Edition)</i> .	Prime Constructions / AECOM	At the completion of the earthworks and if any unexpected finds were encountered that required remediation	UCP Section 5
Soil Contamination & Acid Sulphate Soils will be managed as per Table 9 in the ESCP.	Prime Constructions	Ongoing	ESCP Section 9



4.11 Fire Safety and Emergency

The environmental controls that will be implemented to minimise the potential for environmental incidents relating to fire during the construction of Buildings 2C and 2D are presented in **Table 20**.

Table 20 Environmental Management Controls for Fire Safety and Emergency

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Cutting, welding, grinding or other activities likely to generate fires will not be undertaken in the open on days when a total fire ban is proclaimed, unless an exemption is granted by the relevant Fire Service.	Prime Constructions		
When there is a risk of fire being caused by work such as welding, thermal or oxygen cutting, heating or other fire producing or spark producing operations or when burning off is proposed, training will be provided to all personnel in fire prevention, fire safety and basic firefighting skills.		Ongoing	
Appropriate firefighting equipment will be provided as required for the safety of persons and property.		Prior to commencing construction and ongoing	Best practice
Emergency vehicle access to and from the Site will be available at all times during construction.			
Fire extinguishers will be located at work locations where hot work is being undertaken or flammable gases are stored.		Ongoing	
Construction plant will be fitted with fire extinguishers, as required/appropriate.			
Waste material will not be burnt on site and no fires of any kind will be lit on site.			



4.12 Community

As required by Condition B39 of SSD 9794683, community engagement shall be undertaken in accordance with the Community Consultation Strategy (CCS) for Oakdale West, prepared by SLR (2022b) and is attached as **Appendix F**.

The community management controls in **Table 21** will be implemented during the construction of Buildings 2C and 2D.

Table 21 Environmental Management Controls for the Community

Environmental Management Control	Person Responsible	Timing / Frequency	References / Notes
The community must be consulted with regularly throughout the development, including consultation with the nearby sensitive receivers identified in Figure 9 of the consent conditions, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders.		Ongoing	SSD 9794683 Condition B39
Community engagement shall be undertaken in accordance with the Community Communication Strategy for the OWE.			
Sensitive receptors will be consulted prior to actions likely to generate noise, vibration, air quality of traffic impacts.	Communications and Community Liaison Representative	No less than 48 hours prior	ccs
Should any works be likely to generate impacts beyond those identified within the approval's documentation, consultation will be undertaken with the applicable managing agency.		As required	Section 3.2
A Communications and Community Liaison Representative will be appointed as a single point of contact responsible for receiving and disseminating information requests and complaints, along with addressing any interface issues		Prior to commencing construction and ongoing	CCS Section 4
Community consultation meetings will be held to provide a project update and act as an opportunity for the community and stakeholders to discuss recent experiences and upcoming construction activities.	Community Consultation Team	Monthly. Frequency to be revised subject to the level of interest and the construction program	CCS Section 5.3
Community workshops will be held to identify the overarching construction program and communications protocols, with the event advertised via local newspaper and letter box drop.		Prior to commencing construction	



Environmental Management Control	Person Responsible	Timing / Frequency	References / Notes
A Consultation Register will be maintained and record community and stakeholder interactions, along with associated remedial actions as required.	Communications and Community Liaison Representative	Ongoing	
ERG Meetings will be held with key environmental stakeholders and will be briefed on upcoming project tasks with key environmental implications, along with complaints and enquiries received.	Environmental Representative	As required	
Individual Community Meetings will be held with stakeholders as required to discuss a specific item.			
Newspaper Advertisements will be published in The Western Weekender and Mt Druitt – St Marys Standard identifying the project hotline number and web page address.		Prior to commencing construction and ongoing	
Notification Letterbox Drop will be provided to specific receivers identified as being potentially affected by construction. This could be undertaken in tandem with door knocking.	Community Consultation Team	As required in accordance with Table 7 of the CCS	
Site Signage will display project information details including the hotline and web page, along with relevant project and safety information.			CCS Section 5.3
Online Feedback Forms will be available on the web page, with feedback provided to be incorporated into the consultation register and actioned as required.		Prior to commencing construction and	
A 24 hour Project Information and Complaints Number will be available for reporting project feedback.	Communications and Community Liaison Representative	ongoing	
Staff and Visitor Induction and Training will be undertaken in accordance with Section 3.4 .	Prime Constructions		
Text Message and Email Alerts will provide important information at short notice to potentially affected receivers. Text message details to be recorded in the consultation register.		As required	
A dedicated web page will be established to provide project updates, along with real time environmental performance monitoring.	Community Consultation Team	Prior to commencing construction and ongoing	
Notification requirements will be undertaken in accordance with Table 6, 7 and 8 of the CCS.		Ongoing	CCS Sections 5.3.2 and 5.3.3



4.13 Heritage

The environmental management controls in **Table 22** will be implemented to minimise the potential for adverse heritage impacts from the construction of Buildings 2C and 2D.

These controls outline the Unexpected Finds Protocol from Conditions D106, D107 and D108 of SSD 7348 to be followed in the event that unanticipated archaeological items are uncovered.

In addition to this, if any further instruction is required, please refer to the Oakdale West Estate-Wide Unexpected Finds Protocol – Archaeological Items, prepared by Artefact (2019) and attached as **Appendix N**.

Table 22 Environmental Management Controls for Heritage

Environmental Management Control	Person Responsible	Timing / Frequency	References / Notes
 D106. If any item or object of Aboriginal heritage significance is identified on site: a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately; b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and c) Heritage NSW must be contacted immediately. 	Prime Constructions	Ongoing	SSD 7348 Condition D106
D107. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the <i>National Parks and Wildlife Act 1974</i> .			SSD 7348 Condition D107
D109. If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded in accordance with the requirements of Department of Premier and Cabinet, Heritage Division.	Prime Constructions	Ongoing	SSD 7348 Condition D108



4.14 Sustainability

Ecologically sustainable development (ESD) principles will be incorporated into the construction of Building 2C and 2D in accordance with the Sustainability Management Plan (SMP) (SLR 2022a) prepared to support this CEMP and attached as **Appendix O**. These environmental management commitments are outlined in **Table 23** and will be implemented for the construction of Buildings 2C and 2D.

Table 23 Environmental Management Controls for Sustainability

Environmental Management Commitments	Person Responsible	Timing / Frequency	References / Notes
This warehouse will comply with all the façade performance requirements specified within the SMP during construction stage.	Prime Constructions	Ongoing	SMP Section 4.1
More than 70% of the predicted construction waste arising from development can be reused (on-site or at another development) or recycled offsite. Refer to Waste Management Plan.	Prime Constructions	Ongoing	SMP Section 4.1
Construction will be undertaken in accordance with the ESD principles, as applicable to construction, outlined in Table 3 of the SMP.	Prime Constructions	Ongoing	SMP Section 4.1
 The following will be required to be submitted with the application for a Construction Certificate: Details or NCC Section J5 certification demonstrating compliance with air-conditioning energy efficiency requirements. A Project Section J report to demonstrate building fabric compliance. 	Prime Constructions	With submission of construction certificate	SMP Section 4.5 and 4.6



5 Monitoring and Reporting

5.1 Environmental Monitoring and Inspections

Table 24 summarises the monitoring requirements for the construction of Buildings 2C and 2D at Oakdale West as set out in SSD 9794683 and relevant management plans.

Table 24 Monitoring and Inspection Requirements

Monitoring / Inspection Requirement	Person Responsible	Timing / Frequency	References / Notes
General			
Inspection and maintenance of all plant and equipment items to ensure optimal operating condition.	Prime Constructions	As specified by the manufacturer / supplier	Best practise
Prime Constructions will regularly monitor the implementation of the CEMP, and any other documents identified by the Planning Secretary, to ensure implementation is being carried out in accordance with the CEMP and SSD 9794683.	Environmental Consultant	Weekly	SSD 9794683 Condition C1(a)(iii)
All monitoring will be undertaken in accordance with Division 9.4 of Part 9 of the EP&A Act.	Environmental Consultant / Prime Constructions	Ongoing	SSD 9794683 Condition C13
General environmental site inspection to ensure all relevant environmental controls listed in this CEMP are in place and any required maintenance and/or remediation works are identified and undertaken.	Prime Constructions	Weekly	Best practice
Noise			
Attended noise measurements will be undertaken at the start of noise intensive works in the vicinity of sensitive receivers to verify the levels are as predicted and to check the effectiveness of mitigation and management measures used to minimise the impacts	Prime Constructions	Prior to commencing noise intensive works	CNVMP Section 8.1
Attended monitoring will also be undertaken in response to any complaints regarding construction noise and will take place during the expected noisiest construction periods and be representative / indicative of any impact across all potentially affected sensitive receivers.	Prime Constructions	Following a noise-related complaint	CNVMP Section 8.1



Monitoring / Inspection Requirement	Person Responsible	Timing / Frequency	References / Notes
All items of acoustic instrumentation utilised will be designed to comply with applicable guidelines and carry current calibration certificates.	Prime Constructions	Ongoing	CNVMP Section 8.1
Vibration			,
Vibration will be monitored continuously within the minimum working distances (see Table 10) where vibration intensive works (such as vibratory rolling and plate compacting) are proposed to be undertaken within the minimum working distances of sensitive receivers or structures.		Continuously	
Attended vibration measurements will be undertaken at the commencement of vibration intensive works within the minimum working distances to confirm the levels of vibration are below the applicable vibration limits.	Prime Constructions	Prior to commencing vibration intensive works	CNVMP
Geophones will be installed by an acoustic consultant at the closest points of the sensitive structure to the vibration intensive works to continuously monitor vibration for the duration of the works. Should the works location change, the geophones will be relocated to remain at the closest point of the structure to the works.		Prior to commencing construction and ongoing	Section 8.2
The monitoring equipment will have visible and audible alarms in accordance with Section 8.2 of the CNVMP.		Ongoing	
Air Quality			
The parametres identified in Table 11 will be used to assess the effectiveness of air quality control measures	Prime Constructions	Ongoing	CAQMP Section 8
Visual inspections will be undertaken to assess dust levels and the effectiveness of any dust controls that have been implemented, which may include engaging additional resources to reduce or mitigate the risk of dust leaving the site	Prime Constructions	Daily	CAQMP Section 8
Meteorological data recorded at Horsley Park AWS will be monitored and reviewed on a daily basis.			
The air quality monitoring program currently in place at Oakdale West will continue to be implemented throughout the construction of Buildings 2C and 2D.	Goodman	Ongoing	CAQMP Section 10
Traffic			



Monitoring / Inspection Requirement	Person Responsible	Timing / Frequency	References / Notes
Delivery volumes will be monitored against the volumes outlined within the Traffic Impact Assessment report, including registration and time of entry	Prime Constructions	Ongoing	CTMP Section 7.1
Monitoring of movements to ensure drivers are adhering to the approved construction hours, and to ensure that the approved traffic generation, and subsequent impacts on the road network, are in line with those approved	Prime Constructions	Fortnightly	CTMP Section 6.2
Monitor parking and access to identify shortfalls and issues.	Prime Constructions	Ongoing	CTMP Section 7.1
Monitor TGSs (if necessary) to ensure they are consistent with set-up on site.	Prime Constructions	Ongoing	CTMP Section 6.2 and 7.1
Regular checks will be undertaken to ensure all loads are entering and leaving site covered.	Prime Constructions	Ongoing	CTMP Section 7.1
A Dilapidation report shall be undertaken to assess the condition of the road and note whether there has been any reduction in quality of the road as result of construction vehicles.	Prime Constructions	Monthly	CTMP Section 7.1
Monitor designated heavy vehicle routes being used on site, and parking and access issues.	Prime Constructions	Ongoing	CTMP Section 5.4 and 7.1
A program will be developed to monitor the effectiveness of the CTMP.	Prime Constructions	Ongoing	CTMP Section 7.1
Soil and Water			
Any material transported onto road surfaces to be removed.	Prime Constructions	Daily and before rainfall	Best practice
Monitoring and Inspections will occur in accordance with Section 6 of the SWMP (SW38-SW41).	Prime Constructions	Ongoing	SWMP Section 6
Environmental Site Inspection to evaluate the effectiveness of erosion and sediment control measures in accordance with Table 6-1 of SWMP.		Weekly	
Rainfall Inspection (10mm or greater rainfall) to evaluate the effectiveness of erosion and sediment control measures in accordance with Table 6-1 of SWMP. A rain gauge is to be installed in the main compound as per Section 7.5 of SWMP.	Environmental Site Representative	Prior to rainfall event, during event, within 24 hours after the event.	SWMP Section 7.3



Monitoring / Inspection Requirement	Person Responsible	Timing / Frequency	References / Notes
Establish a thorough inspection and maintenance program to monitor, record and schedule actions for maintenance and upgrades of controls, rectification works, and sediment removal and handling.	Prime Constructions	Ongoing	ESCP Section 7.4
Monitor forecast weather events and implement response plans for significant wind or rainfall events and flooding.	Prime Constructions	Ongoing	ESCP Section 7.4
Stabilisation measures will be monitored, and prompt and effective revegetation and permanent stabilisation promoted.	Prime Constructions	Ongoing	ESCP Section 7.4
Waste			
As per Council's DCP, records of waste volumes recycled, reused or contractor removed are to be maintained.	Prime Constructions	Daily	WMP Section 5.10
Visual inspections of waste storage areas will be undertaken.			30000
Visual Amenity			
The Site will be inspected to ensure that pests, vermin or noxious weeds are not present on Site in sufficient numbers to pose an environmental hazard, or cause the loss of amenity in the surrounding area.	Prime Constructions / ER	During Environmental Consultant inspections	Best practice
Community			
 The following will be monitored: Total number of complaints Number of complaints relating to lack of consultation / misinformation / confusion Number of enquiries relating to information previously disseminated Number of complaints / enquiries within defined categories based on theme or subject Response timeframes 	Communications and Community Liaison Representative	Monthly	CCS Section 6.1



5.2 Reporting

Table 25 summarises the reporting requirements for the construction of Buildings 2C and 2D at Oakdale West as set out in SSD 9794683 and relevant management plans.

Table 25 Reporting Requirements

Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
General Environmental Performance			
Compliance Reports of the Development will be carried out in accordance with the Compliance Reporting Post Approval Requirements (Department 2020).	Goodman/ 'Prime Constructions	As set out in the DPE guidelines	SSD 9794683 Condition C11
Each Compliance Report will be made publicly available.		No later than 60 days after submitting it to the DPE and notify the DPE in writing at least 7 days before this is done.	SSD 9794683 Condition C12
Regular reporting on environmental performance will be uploaded on the dedicated website as per the reporting arrangements in any plans or programs approved under the conditions of SSD 9794683.		48 hours prior to commencing construction and ongoing	SSD 9794683 Condition C14
The Prime Constructions will report environmental performance during regular management meetings and/or 'toolbox talks'. Items to be discussed include:			
 Results of any monitoring activities undertaken 			
 Any environmental incidents that have occurred during the previous period, including the management / corrective actions taken 	Prime Constructions	Weekly	Section 3.4
 Any complaints that have been received during the previous period, including any management / corrective actions taken 			



Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
 A copy of all environmental records will be maintained, including: Site environmental inspection reports Environmental monitoring data Internal and external audit reports Reports of environmental incidents, environmental, associated actions taken, and follow-up actions Minutes of management review meetings Induction and training records 	Prime Constructions	For at least 5 years after completion	Best practice
Meteorological data including rainfall will be recorded.		Daily	
Incident / Non-Compliance Reporting			
The DPE will be notified of any incident in writing via the Major Projects website and include the requirements outlined in Appendix 4 of SSD 9794683.	Goodman / Prime Constructions	Within 7 days after Goodman becomes aware of the incident	SSD 9794683 Condition C7
A detailed incident report will be provided to the Planning Secretary and include the requirements outlined in Appendix 4 of SSD 9794683.		Within 30 days of the incident occurring	and Appendix 4
The DPE will be notified of any non-compliance in writing via the Major Projects website.		Within 7 days after Goodman becomes aware of the non- compliance	SSD 9794683 Condition C8
A register of all complaints and non-compliances will be kept.		For at least 5 years after completion	Best practice
Noise			
Monitoring reports will be produced following each monitoring survey and provided to Goodman for review.	Prime Constructions	Following each monitoring survey	CNVMP Section 8.1
Vibration			



Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes	
Vibration monitoring reports will be prepared at the following stages: Prior to commencement of works (baseline report) Monthly during works (at a minimum) Within one week of an exceedance of the vibration limit alarm level (15 mm/s PPV) Upon completion of construction	Prime Constructions	Monthly at minimum	CNVMP Section 8.2	
Traffic				
Reporting of movements to ensure drivers are adhering to the approved construction hours, and to ensure that the approved traffic generation, and subsequent impacts on the road network, are in line with those approved.	Prime Constructions	Fortnightly	CTMP Section 6.2	
Soil and Water				
A site dewatering register will be maintained for site areas (other than sediment basins) that require treatment, dewatering and discharge to off-site areas. The register will record; • dewatering procedure; • date and time for each discharge at each location; • water quality test results for each discharge; • personnel approving the dewatering activities; • evidence of discharge monitoring, or risk assessment and mitigation; and • measures used to eliminate the risks of pollution or erosion.	Prime Constructions	Ongoing	SSD 7348 Condition D81 & D82 SWMP Section 6 (SW27)	
Waste				
Waste Record Keeping will occur in accordance with Section 5.7.3 of the WMP.	Prime Constructions	Ongoing	WMP Section 5.7.3	
Hazardous Goods and Contamination				
Any material identified as contaminated will be disposed off site, with the disposal location and results of testing recorded prior to its removal from the site.	Prime Constructions / Environmental Consultant	As required	Best practice	



Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
Where the contamination is known or an unexpected contamination find has been identified, a Remediation Action Plan (RAP) will be prepared (as required) in accordance with G36 and the UCP (AECOM 2022).	Prime Constructions	As required	UCP Section 3.1
AECOM will prepare a Validation Report in accordance with the requirements of the NSW OEH (2011) Guidelines for Consultants Reporting on Contaminated Sites and EPA (2017) Guidelines for the NSW Site Auditor Scheme (3 rd Edition).	Prime Constructions / AECOM	At the completion of the earthworks and if any unexpected finds were encountered that required remediation	UCP Section 5
Should unexpected contamination finds require remediation, the works will be undertaken in accordance with <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> Chapter 4 – Remediation of Land.	Prime Constructions / Project Manager / AECOM	As required	Consultation with Council
Should unexpected contamination finds require remediation, Council will be notified for Category 1 works.	Prime Constructions / Project Manager / AECOM	As required	Consultation with Council
Community			
 The monthly community consultation summary will be made publicly available on the project web page and shall include: A summary of community consultation activities undertaken within the preceding month A summary of community consultation activities proposed within the following month A summary of all enquiries and complaints received within the preceding month, including details of response and/or remediation activities 	Communications and Community Liaison Representative	Monthly	CCS Section 6.2



Goodman Property Services (Aust) Pty Ltd CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN Building 2C and 2D Oakdale West Industrial Estate SSD 9794683

5.3 Auditing

Table 26 summarises the auditing requirements for Buildings 2C and 2D works as set out in SSD 9794683 and relevant management plans.

Table 26 Audit Requirements

Reporting Requirement	Person Responsible	Timing / Frequency	References / Notes
General			
All audits will be undertaken in accordance with Division 9.4 of Part 9 of the EP&A Act.	Environmental Consultant / Prime Constructions	Ongoing	SSD 9794683 Condition C13
A project audit will be undertaken to ensure all aspects of the project are implemented.	Environmental Consultant	Within 6 months of the commencement of construction	Environmental Consultant recommendation
Soil and Water			
An audit program will be developed:			
 Noting the condition of installed erosion and sediment controls onsite 		Weekly, before	
 Detailing maintenance requirements (if any) for installed erosion and sediment controls 	Prime Constructions	extended shut- down and after	ESCP
Recording the volumes of sediment removed from sediment controls and sediment traps, where applicable	Constructions	rainfall events over 10 mm	Section 7.7
 Recording the location to where extracted sediments are disposed. 			
Audits (both internal and external) will be undertaken to assess the effectiveness of environmental mitigation and management measures.	Prime Constructions	As required	SWMP Section 7.6

5.4 Contingency Management Plan

Table 27 lists the actions to be implemented if inspections, monitoring and/or auditing indicate that the mitigation measures listed in **Section 4** and the specialist management plans are not effective in managing environmental impacts.

All Condition Amber and Condition Red occurrences will be recorded in Oakdale West's Environmental Representative Monthly Report and discussed during the toolbox talks.



Table 27 Contingency Plan

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

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Trigger	Daily inspections show that there is no visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site.	Daily inspections show there is visible dust leaving the site multiple times a day OR from multiple locations within the site.
Visible dust leaving the site	Response	Continue monitoring program as normal.	Review and investigate construction activities and respective control measures. Where appropriate, implement additional remedial measures, such as: • Deployment of additional water sprays, water trucks etc	Undertake an investigation of the dust generating activities, and if necessary, temporarily halt the dust generating activities
	Trigger	Dust deposition rates are less than 4 g/m²/month at all the dust gauges.	Dust deposition rate greater than 4 g/m²/month is recorded by any of the dust gauges	Dust deposition rates greater than 4 g/m²/month are recorded by two or more dust gauges for two months in a row.
Dust deposition reading of >4g/m²/mont h	Response	Continue monitoring program as normal.	 OWE Project Manager to analyse data to try to identify the source(s) of dust. Prime Constructions to review operations to reduce dust emissions from the identified key source(s). Implement any additional mitigation measures as required, such as additional watering. 	 OWE Project Manager to review and investigate construction activities and respective control measures for the monitoring period. If it is concluded that construction activities at Buildings 2C and 2D were directly responsible for the exceedance (i.e. the exceedance event was not caused due to high regional dust levels or local non-project dust source), Prime Constructions to submit an incident report to government agencies.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Complaints received	Trigger	There are no complaints received during the construction	An air-quality related complaint is received from a nearby resident	Further complaints are received from the same complainant after the additional mitigation measures have been implemented
regarding nuisance dust	Response	Continue monitoring program as normal.	 Report the complaint to the regulator, in line with complaints handling procedure (See Section 3.6.3). Review and investigate construction activities and increase dust suppression measures (additional watering, covering stockpiles etc), where appropriate. 	Review real-time monitoring data at the existing continuous monitors to investigate the likelihood of onsite activities contributing.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Trigger	Running 24-hour average PM ₁₀ concentrations < 40 μg/m ³	Running 24-hour average PM ₁₀ concentrations >40 μg/m³ but <50 μg/m³	Running 24-hour average PM ₁₀ concentrations >50 μg/m ³
Real-time suspended particulate matter monitoring (TSP and PM ₁₀)	Response	Continue monitoring program as normal.	OWE Project Manager to review and investigate construction activities and respective control measures. Where appropriate, implement additional remedial measures, such as: Deployment of additional water sprays, water trucks etc Relocation or modification of dust-generating sources Record findings of investigations and actions taken to reduce dust levels Continue to closely monitor dust levels to ensure they are decreasing If elevated dust levels are due to regional dust event (fire, dust storm etc) – still take action to minimise dust from the Buildings 2C and 2D to minimise cumulative impacts, but also record details of the cause of the elevated background levels.	OWE Project Manager to review and investigate construction activities and respective control measures for the monitoring period, in an air pollution incident report. If it is concluded that construction activities at Buildings 2C and 2D were directly responsible for the exceedance (ie the exceedance event was not caused due to high regional dust levels or local non-project dust source), Prime Constructions to submit an incident report to government agencies.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Trigger	Construction traffic does not exceed the permissible volume and time constraints.	Construction traffic just exceeds the permissible volume and time constraints.	Construction traffic far exceeds the permissible volume and time constraints.
Traffic Construction movements	Response	No response required.	Review and investigate construction activities, and where appropriate, implement additional remediation measures such as: Review CTMP and update where necessary Provide additional training	As with Condition Amber, plus; • If it is concluded that construction activities were directly responsible for the exceedance, submit an incident report to government agencies. • Stop all transportation into and out of the site.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Trigger	No queuing identified.	Queuing identified within site.	Queuing identified on the public road.
Traffic Queuing	Response	No response required. Continue monitoring program.	Review the delivery schedule prepared by the builder. If drivers are not following the correct schedule, then they should be provided with additional training and an extra copy of the Driver Code of Conduct .	Review and investigate construction activities. If it is concluded that construction activities were directly responsible for the exceedance, submit an incident report to government agencies. Where appropriate, implement additional remediation measures such as: Temporary halting of activities and resuming when conditions have improved Stop all transportation into and out of the site Review CTMP and update where necessary Provide additional training
	Trigger	Noise levels do not exceed imposed noise constraints.	Noise levels in minor excess of imposed noise constraints.	Noise levels greatly in excess of imposed noise constraints.
Traffic Noise	Response	No response required.	Undertake all feasible and reasonable mitigation and management measures to minimise noise impacts.	As with Condition Amber If noise levels cannot be kept below applicable limits, then a different construction method or equipment must be utilised.



Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
- "	Trigger	No observable issues.	Minor inconsistencies with TGS to onsite operations.	Near miss or incident occurring regardless of / as a result of the TGS being implemented.
Traffic Guidance Scheme	Response	No response required.	Traffic Controller to amend TGS on site and to keep a log of all changes.	Stop work until an investigation has been undertake into the incident. There are to be changes made to the TGS to ensure that the safety of all workers, students and civilians are catered for.
	Trigger	No observable dust.	Minor quantities of dust in the air and tracking on to the road.	Large quantities of dust in the air and tracking on to the road.
Traffic Dust	Response	No response required.	Review and investigate construction activities and respective control measures, where appropriate. Implement additional remedial measures, such as: Deployment of additional water sprays Relocation or modification of dustgenerating sources Check condition of vibrating grids to ensure they are functioning correctly Temporary halting of activities and resuming when conditions have improved	As with Condition Amber. If it is concluded that construction activities were directly responsible for the exceedance, submit an incident report to government agencies. Implement relevant responses and undertake immediate review to avoid such occurrence in future.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Erosion	Trigger	No evidence of erosion.	Minor gully or tunnel erosions present and/or rilling. Evidence of sediment or sediment laden water leaving the site.	Significant gully or tunnel erosions present and/or rilling. Evidence of sediment or sediment laden water leaving the site.
	Response	Continue CEMP implementation.	A suitably trained person to inspect the site. Review of erosions and sediment structures. Remediate as appropriate.	A suitably trained person to inspect the site. Review of erosion and sediment structures. Remediate as soon as practical.
Water management	Trigger	Water management structures have been designed, constructed and managed in accordance with the Blue Book and the ESCPs.	Inspections indicate that water management structures illustrate minor non-compliance with the Blue Book and the ESCPs.	Inspections indicate a failure of the water management structures.
structures	Response	Continue CEMP implementation.	A suitably trained person to inspect the site. Review of water management structures. Remediate as appropriate.	A suitably trained person to inspect the site. Remediate as soon as practical. Review of engineering design and revise ESCPs.



Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Waste	Trigger	Weekly Environmental Consultant inspections identified no waste outside of dedicated bins and stockpiles.	Weekly Environmental Consultant inspections identified minimal waste outside of dedicated bins and stockpiles.	Weekly Environmental Consultant inspections identified large quantities of waste outside of dedicated bins and stockpiles. Complaints received regarding waste.
Res	Response	Continue CEMP implementation.	The Project Manager is notified and the waste is cleaned up immediately.	The Project Manager is notified and the waste is cleaned up immediately. The Communications and Community Liaison Representative is also notified and the complaints handling process outlined in Section 3.6 and the CCS is implemented.
	Trigger	No contamination uncovered during earthworks.	Areas of possible contamination uncovered.	Areas of contamination uncovered.
Unexpected Contaminatio n	Response	Continue CEMP implementation.	Stop work immediately and assess the contamination according to the UCP (AECOM 2022).	Stop work immediately and a RAP is to be prepared. A validation report is to be prepared following remediation. Refer to UCP (AECOM 2022).

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Trigger	No unknown heritage items uncovered.	Potential heritage item uncovered.	Potential heritage item uncovered causing significant delays to project.
Heritage Find	Response	Continue CEMP implementation.	Stop work and follow unexpected finds protocol as outlined in SSD9794683 B49. Refer to UFP (Artefact 2019).	Stop work and follow unexpected finds protocol as outlined in SSD9794683 B51. Heritage item to be salvaged and removed from site by a qualified archaeologist. Refer to UFP (Artefact 2019).
	Trigger	General feedback/comment (no complaint or query).	Enquiry made by formal or informal channels.	Complaint made by formal or informal channels.
Feedback/Co mplaints	Response	Acknowledge receipt and record in consultation register. No further response required.	Acknowledge receipt and record in consultation register. Direct enquiry to relevant person for actioning and response within 5 days.	Acknowledge receipt and record in consultation register. Respond to complaint immediately if possible, if not direct enquiry to relevant person for actioning and provide complainant with a follow up verbal response on what action is proposed within two hours during construction works (including night and weekend works) and 24 hours at other times.

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
	Trigger	Positive story in print, online, radio or television.	Neutral or advisory story in print, online, radio or television.	Negative story in print, online, radio or television.
Media	Response	Record in consultation register and advise Goodman media/marketing team. No further response required.	Record in consultation register and advise Goodman media/marketing team. No further response required.	Record in consultation register and advise Goodman Project Team for further action and response. Contact relevant person for actioning and response within 48 hours
	Trigger	Event occurring outside of plan or schedule without impact or potential impact.	Event occurring outside of plan or schedule with minor impact or potential impact.	Event occurring outside of plan or schedule with major impact or potential impact.
Unscheduled Event	Response	No response required. Identify opportunities for improvement to manage potential future events.	Contact relevant person for actioning and response within 48 hours. Acknowledge in consultation register. Identify opportunities for improvement to manage potential future events.	Contact relevant person for actioning and response immediately. Acknowledge in consultation register. Identify opportunities for improvement to manage potential future events.
	Trigger	General or non-specific enquiry by Local, State or Federal political representative.	Enquiry or complaint relating to minor issue by Local, State or Federal political representative.	Enquiry or complaint relating to major issue by Local, State or Federal political representative.
Political Interest	Response	Community consultation team in conjunction with Goodman Project Team to prepare and provide response or assign response task to relevant staff member for comment. Record in consultation register.	Community consultation team in conjunction with Goodman Project Team to prepare and provide response within 48 hours. Record in consultation register.	Community consultation team in conjunction with Goodman Project Team to prepare and provide response within 24 hours. Record in consultation register.

6 Review and Improvement of Environmental Performance against CEMP

As per Condition C1(e) of SSD 9794683, review of the CEMP will be undertaken at least quarterly and will include participation by Goodman. The review will comprise, as a minimum, the following:

- Identification of areas of opportunity for improved environmental performance;
- Analysis of the causes of non-compliances, including those identified in environment inspections and audits;
- Verification of the effectiveness of corrective and preventative actions; and
- Highlighting any changes in procedures resulting from process improvement.

Condition C5 also states that all strategies, plans and programs required under SSD 9794683 will be reviewed and the Planning Secretary notified in writing of any outcomes of the review within three months of:

- the submission of a Compliance Report under condition C11;
- the submission of an incident report under condition C7;
- the approval of any modification of the conditions of this consent; or
- the issue of a direction of the Planning Secretary under Condition A2(b) which requires a review.

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

- Where there is any change to the scope of the construction activities and/or disturbance footprint;
- Where it is identified that the environmental performance is not meeting the objectives of the CEMP;
 and/or
- At the request of a relevant regulatory authority.

Notwithstanding the review requirements outlined above, in accordance with the requirements of Condition C1(g) the following is provided as the protocol for periodic review of this CEMP and all management plans required under SSD 9794683.

- All management plans required under SSD 9794683 are to be reviewed every 6 months by their original Author
- The periodic review is to take account of any required changes to procedures, updates or changes to best practice, any non-compliances in the proceeding 6 month period and whether changes can be made to improve the environmental performance of the development.

As per Condition C6 where documents are revised under the above reviews the revised documents will be sent to DPE within 6 weeks of review. All employees and contractors will be informed of any revisions to the CEMP by the Contractor's Project Manager during toolbox talks.



7 References

AECOM (2022) Oakdale West Unexpected Finds Protocol – Contamination

Artefact (2019) Oakdale West Unexpected Finds Protocol - Archaeological

Ason (2022) Construction Traffic Management Plan

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

Ecologique (2022) Flora and Fauna Management Plan

Keylan Consulting (2021) Environmental Impact Statement (EIS) State Significant Development Application (SSD 9794683)

Keylan Consulting (2021) Response to Request for further Information

Rubicon Enviro (2022) Soil and Water Management Plan

Rubicon Enviro (2022a) Erosion and Sediment Control Plan

SLR (2020) Oakdale West Industrial Estate Construction Environmental Management Plan (CEMP) SSD 7348

SLR (2022) Construction Air Quality Management Plan

SLR (2022a) Construction Noise and Vibration Management Plan

SLR (2022b) Oakdale West Community Consultation Strategy

SLR (2022c) Sustainability Management Plan

SLR (2022d) Waste Management Plan



APPENDIX A

Development Consent SSD 9794683



Development Consent

Section 4.38 of the Environmental Planning and Assessment Act 1979

As delegate of the Minister for Planning and Public Spaces under delegation executed on 26 April 2021, I approve the Development Application referred to in Schedule 1, subject to the conditions specified in Schedule 2.

These conditions are required to:

- prevent, minimise, or offset adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the ongoing environmental management of the development.

Chris Ritchie

Director

Industry Assessments

Retake

Sydney 16 December 2021 File: SF20/107249

SCHEDULE 1

Application Number: SSD-9794683

Applicant: Goodman Property Services (Aust) Pty Ltd

Consent Authority: Minister for Planning and Public Spaces

Site: 2 Sepia Road, Kemps Creek NSW 2178 (Lot 105 DP 1262310)

19 Emporium Avenue, Kemps Creek NSW 2178 (Lot 107 DP

1262310)

Development: Oakdale West Estate Stage 3 Development including

construction, fit out, operation and use of warehouse buildings

2A, 2C and 2D, associated office space and parking

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DEFINITIONS

DEFINITIONS			
Applicant	Goodman Property Services (Aust) Pty Ltd, or any person carrying out any development to which this consent applies		
BCA	Building Code of Australia		
Carrier	Operator of a telecommunication network and/or associated infrastructure, as defined in section 7 of the <i>Telecommunications Act 1997</i> (Cth)		
Certifier	A council or an accredited certifier (including principal certifiers) who is authorised under section 6.5 of the EP&A Act to issue Part 6 certificates		
CEMP	Construction Environmental Management Plan		
Conditions of this consent	Conditions contained in Schedule 2 of this consent		
Construction	The carrying out of works for the purpose of the development, including detailed earthworks, erection of buildings 2A, 2C and 2D, internal fit-out and construction of associated infrastructure permitted by this consent		
Council	Penrith City Council		
Day	The period from 7 am to 6 pm on Monday to Saturday, and 8 am to 6 pm on Sundays and Public Holidays		
Department	NSW Department of Planning, Industry and Environment		
Development	The development described in Schedule 1, the EIS and RTS, including construction and operation of three warehouses and associated office space and infrastructure		
Development layout	The plans at Appendix 1 of this consent		
DPIE	Has the same meaning as the definition of the Department in development consent		
Earthworks	Bulk earthworks, site levelling, import and compaction of fill material, excavation for installation of drainage and services, to prepare the site for construction		
EES	Environment, Energy and Science Group of the Department		
EIS	The Environmental Impact Statement titled Oakdale West Industrial Estate – Stage 3, 2 Aldington Road, Kemps Creek, prepared by Keylan Consulting Pty Ltd dated February 2021, submitted with the application for consent for the development		
Environment	As defined in section 1.4 of the EP&A Act		
EP&A Act	Environmental Planning and Assessment Act 1979 (NSW)		
EP&A Regulation	Environmental Planning and Assessment Regulation 2000 (NSW)		
Evening	The period from 6 pm to 10 pm		
Fibre ready facility	As defined in section 372W of the Telecommunications Act 1997 (Cth)		
GLA	Gross lettable area		
GFA	Gross floor area		
Heritage	Encompasses both Aboriginal and historic heritage including sites that predate European settlement, and a shared history since European settlement		
Heritage item	An item as defined under the <i>Heritage Act 1977</i> , and assessed as being of local, State and/ or National heritage significance, and/or an Aboriginal Object or Aboriginal Place as defined under the <i>National Parks and Wildlife Act 1974</i> , the World Heritage List, or the National Heritage List or Commonwealth Heritage List under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth), or anything identified as a heritage item under the conditions of this consent		
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance Note: 'material harm' is defined in this consent		
Land	Has the same meaning as the definition of the term in section 1.4 of the EP&A Act		
Material harm	Is harm that: a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or		

	 results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment) 			
Minister	NSW Minister for Planning and Public Spaces (or delegate)			
Mitigation	Activities associated with reducing the impacts of the development prior to or during those impacts occurring			
Monitoring	Any monitoring required under this consent must be undertaken in accordance with section 9.40 of the EP&A Act			
Night	The period from 10 pm to 7 am on Monday to Saturday, and 10 pm to 8 am on Sundays and Public Holidays			
Non-compliance	An occurrence, set of circumstances or development that is a breach of this consent			
Operation	The use of Buildings 2A, 2C and 2D for storage and distribution as described in the EIS and RTS			
OWE	Oakdale West Estate including the approved Concept Plan for 22 warehouse buildings and associated infrastructure and Stage 1 development including bulk earthworks across the site, construction and operation of 3 warehouses and the Western North-South Link Road, as described in the development consent SSD 7348, approved on 13 September 2019, as modified			
Principal Certifier	The certifier appointed as the principal certifier for the building work under section 6.6(1) of the EP&A Act or for the subdivision work under section 6.12(1) of the EP&A Act.			
Planning Secretary	Planning Secretary under the EP&A Act, or nominee			
Reasonable	Means applying judgement in arriving at a decision, taking into account: mitigation benefits, costs of mitigation versus benefits provided, community views, and the nature and extent of potential improvements.			
Registered Aboriginal Parties	Means the Aboriginal persons identified in accordance with the document entitled "Aboriginal cultural heritage consultation requirements for proponents 2010" (DECCW)			
Rehabilitation	The restoration of land disturbed by the development to a good condition, to ensure it is safe, stable and non-polluting			
Response to Submissions (RtS)	The Applicant's response to issues raised in submissions received in relation to the application for consent for the development under the EP&A Act and includes the document titled <i>Oakdale West Estate Stage 3 (SSD 9794683) – Response to Submissions</i> prepared by Goodman Property Services (Aust) Pty Ltd and dated April 2021 and <i>Oakdale West Industrial Estate Stage 3 (SSD 9794683) – Amended Development Application</i> prepared by Keylan Consulting Pty Ltd and dated 9 November 2021			
Sensitive receivers	A location where people are likely to work, occupy or reside, including a dwelling, school, hospital, office, or public recreational area.			
Site	The land defined in Schedule 1			
SLR	Proposed Southern Link Road as shown in the WSEA SEPP and the document titled <i>Broader WSEA SLRN Options Refinement Report</i> prepared by AECOM, 2014			
TfNSW	Transport for New South Wales			
Waste	Has the same meaning as the definition of the term in the Dictionary to the POEO Act			
WNSLR	Western North-South Link Road as shown in the WSEA SEPP and approved under the OWE development consent SSD 7348			
WSEA	Western Sydney Employment Area			
WSEA SEPP	State Environmental Planning Policy (Western Sydney Employment Area) 2009			
Year	A period of 12 consecutive months			

SCHEDULE 2

PART A ADMINISTRATIVE CONDITIONS

OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

A1. In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.

TERMS OF CONSENT

- A2. The development may only be carried out:
 - (a) in compliance with the conditions of this consent;
 - (b) in accordance with all written directions of the Planning Secretary:
 - (c) in accordance with the EIS and RtS;
 - (d) in accordance with the Development Layout in Appendix 1; and
 - (e) in accordance with the management and mitigation measures in Appendix 3.
- A3. Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to:
 - (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; and
 - (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).
- A4. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

LIMITS OF CONSENT

Lapsing

A5. This consent lapses five years after the date from which it operates, unless the development has physically commenced on the land to which the consent applies before that date.

Development Controls

- A6. The total area of warehousing and office space at the development must not exceed the following maximum gross lettable area:
 - (a) Building 2A 35,612 square metres;
 - (b) Building 2C 10,565 square metres; and
 - (c) Building 2D 6,235 square metres.
- A7. The development must be consistent with the development controls in the OWE, as shown in Table 1.

Table 1: Development Controls

Development Aspect	Control	
Minimum building setbacks from:		
Southern Link Road	17.15 m	
Compass Drive	20 m	
Local Estate Roads	7.5 m	
Western boundary of the OWE	40 m	
Southern boundary of the OWE	20 m (excluding parking areas)	
Rear boundary setbacks within the estate	5 m	
Side boundary setbacks within the estate	0 m, subject to compliance with fire rating requirements	
Height	15 m	
- Building 2A	18 m	

Development Aspect	Control
- Building 2C	22.2 m
Minimum lot size	5,000 m ²
Minimum frontage	40 m (excluding cul-de-sacs)
	35 m minimum lot width at the building line
Site coverage	Maximum of 65 per cent (excluding awnings)

A8. Notwithstanding the controls listed in Table 1 in Condition A7, no warehouse building in the development, except Buildings 2A and 2C in Precinct 2, shall exceed a ridgeline height of 13.7 m, excluding roof mounted mechanical plant and solar panels.

NOTIFICATION OF COMMENCEMENT

- A9. The date of commencement of each of the following phases of the development must be notified to the Planning Secretary in writing, at least one month before that date, or as otherwise agreed with the Planning Secretary:
 - (a) construction;
 - (b) operation; and
 - (c) cessation of operations.
- A10. If the construction or operation of the development is to be staged, the Planning Secretary must be notified in writing, at least one month before the commencement of each stage (or other timeframe agreed with the Planning Secretary), of the date of commencement and the development to be carried out in that stage.

EVIDENCE OF CONSULTATION

- A11. Where conditions of this consent require consultation with an identified party, the Applicant must:
 - (a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval;
 and
 - (b) provide details of the consultation undertaken including:
 - (i) the outcome of that consultation, matters resolved and unresolved; and
 - (ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.

STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS

- A12. With the approval of the Planning Secretary, the Applicant may:
 - (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);
 - (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and
 - (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development).
- A13. If the Planning Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.
- A14. If approved by the Planning Secretary, updated strategies, plans or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan or program.

PROTECTION OF PUBLIC INFRASTRUCTURE

- A15. Before the commencement of construction of the development, the Applicant must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;
- A16. Unless the Applicant and the applicable authority agree otherwise, the Applicant must:
 - (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development: and
 - (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

STRUCTURAL ADEQUACY

A17. All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA.

Note.

- Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.
- Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.

COMPLIANCE

A18. The Applicant must ensure that all of its employees, contractors (and their sub-contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.

CONTRIBUTIONS TO COUNCIL

A19. Before the issuing of an occupation certificate for any part of the development, a payment of a levy of 1% of the proposed cost of carrying out the development must be paid to Council under section 7.12 of the EP&A Act.

Note: There are approval requirements for imposing a condition under section 7.12 in respect of land within a special contributions area.

OPERATION OF PLANT AND EQUIPMENT

- A20. All plant and equipment used on site, or to monitor the performance of the development, must be:
 - (a) maintained in a proper and efficient condition; and
 - (b) operated in a proper and efficient manner.

EXTERNAL WALLS AND CLADDING

- A21. The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.
- A22. Prior to the issuing of:
 - (a) any Construction Certificate relating to the construction of external walls (including the installation of finishes and claddings such as synthetic or aluminium composite panels); and
 - (b) an Occupation Certificate,

the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls (including finishes and claddings such as synthetic or aluminium composite panels) comply with the requirements of the BCA.

A23. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.

UTILITIES AND SERVICES

- A24. Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.
- A25. Before the commencement of operation of the development, the Applicant must obtain a Compliance Certificate for water and sewerage infrastructure servicing of the site under section 73 of the *Sydney Water Act 1994*.
- A26. The Applicant must demonstrate that the carrier has confirmed in writing they are satisfied that the fibre ready facilities are fit for purpose.
- A27. Before the issuing of the Occupation Certificate for the development the Applicant must demonstrate that the carrier has confirmed in writing it is satisfied that the fibre ready facilities are fit for purpose.

WORK AS EXECUTED PLANS

A28. Before the issuing of the Occupation Certificate for the development, work-as-executed drawings signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Principal Certifier.

APPLICABILITY OF GUIDELINES

- A29. References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this consent.
- A30. However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Planning Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.

ADVISORY NOTES All licences, permits, approvals and consents as required by law must be obtained and maintained as required for AN1. the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.

PART B SPECIFIC ENVIRONMENTAL CONDITIONS

TRAFFIC AND ACCESS

Construction Traffic Management Plan

- B1. Prior to the commencement of construction of the development, the Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must:
 - (a) be prepared by a suitably qualified and experienced person(s);
 - (b) detail the measures that are to be implemented to ensure road safety and network efficiency during construction;
 - (c) detail heavy vehicle routes, access and parking arrangements;
 - (d) include a Driver Code of Conduct (see Condition B12);
 - (e) include a program to monitor the effectiveness of these measures; and
 - (f) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.

B2. The Applicant must:

- (a) not commence construction until the Construction Traffic Management Plan required by condition B1 is approved by the Planning Secretary; and
- (b) implement the most recent version of the Construction Traffic Management Plan approved by the Planning Secretary for the duration of construction.

Parking

B3. The Applicant must provide sufficient parking facilities on-site, including for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.

Operating Conditions

- B4. The Applicant must ensure:
 - (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the development are constructed and maintained in accordance with the latest version of AS 2890.1:2004 Parking facilities Off-street car parking (Standards Australia, 2004), AS 2890.2:2018 Parking facilities Off-street commercial vehicle facilities (Standards Australia, 2018) and AS 2890.6.2009 Parking facilities Off-street parking for people with disabilities (Standards Australia, 2009)
 - (b) the swept path of the longest vehicle entering and exiting the site, as well as manoeuvrability through the site, is in accordance with the relevant AUSTROADS guidelines;
 - (c) the development does not result in any vehicles queuing on the public road network;
 - (d) heavy vehicles and bins associated with the development are not parked on local roads or footpaths in the vicinity of the site;
 - (e) all vehicles are wholly contained on site before being required to stop;
 - (f) all loading and unloading of materials is carried out on-site;
 - (g) all trucks entering or leaving the site with loads have their loads covered and do not track dirt onto the public road network; and
 - (h) the proposed turning areas in the car park are kept clear of any obstacles, including parked cars, at all times.

Sustainable Travel Plan

- B5. Prior to the commencement of operation of any part of the development, the Applicant must prepare a Sustainable Travel Plan. The Sustainable Travel Plan must:
 - (a) be prepared in consultation with TfNSW;
 - (b) outline facilities and measures to promote public transport usage, such as car share schemes and employee incentives; and
 - (c) describe pedestrian and bicycle linkages and end of trip facilities available on-site.
- B6. The Applicant must implement the Sustainable Travel Plan throughout operation of the development.

NOISE

Hours of Work

B7. The Applicant must comply with the hours detailed in **Table 2**, unless otherwise agreed in writing by the Planning Secretary.

Table 2: Hours of Work

Activity	Day	Time
	Monday – Friday	7 am to 6 pm
Construction	Saturday	8 am to 1 pm
Operation	Monday – Sunday	24 hours

- B8. Works outside of the hours identified in Condition B7 may be undertaken in the following circumstances:
 - (a) works that are inaudible at the nearest sensitive receivers;
 - (b) works agreed to in writing by the Planning Secretary;
 - (c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
 - (d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.

Operational Noise Limits

B9. The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in **Table 3**.

Table 3: Noise Limits (dB(A))

Table 3. Noise Limits (ub(A))				
Location	Day L _{Aeq(15 minute)}	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night L _{AMax}
N1 Emmaus Village Residential	44	43	41	52
N3 Kemps Creek – nearest residential property	39	39	37	52
N4 & N5 Kemps creek – other residences	39	39	37	52
N9 to N14 Kemps Creek	47	42	42	52
N2 Emmaus Catholic College (school) When in use: 45 L _{eq(1h)}				

Note Noise generated by the development is to be measured in accordance with the relevant procedures and modifications, including certain meteorological conditions, of the Noise Policy for Industry (EPA, 2017). Refer to the plan in Appendix 2 for the location of residential sensitive receivers.

B10. The noise limits in Table 2 do not apply to receiver N3, N4 and N5 if the Applicant has a Noise Agreement with the relevant landowner to exceed the noise limits, and the Applicant has provided written evidence to the Planning Secretary that an agreement is in place.

Construction Noise Limits

B11. The development must be constructed to achieve the construction noise management levels detailed in *the Interim Construction Noise Guideline* (DECC, 2009) (as may be updated or replaced from time to time). 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 in the Appendix 3.

Road Traffic Noise

B12. Prior to the commencement of construction of the development, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the development.

VISUAL AMENITY

Building Design

B13. The Applicant must construct Buildings 2A, 2C and 2D in accordance with the RtS and as shown on the figures in **Appendix 1**.

Landscaping

- B14. Prior to the commencement of operation of the development, the Applicant must implement the Landscape Plan included in the RtS and shown on the figures in **Appendix 1**.
- B15. The Applicant must maintain the landscaping on the site in accordance with the approved Landscape Plan for the life of the development. If any aspect of the landscaping has not been successful, the Applicant must undertake replanting and rehabilitation works, as reasonably practicable.

Lighting

- B16. The Applicant must ensure the lighting associated with the development:
 - (a) complies with the latest version of AS 4282-2019 Control of the obtrusive effects of outdoor lighting (Standards Australia, 2019); and
 - (b) is mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.

Signage and Fencing

B17. All signage and fencing must be erected in accordance with the development plans included in the RtS.

Note: This condition does not apply to temporary construction and safety related signage and fencing.

SOILS, WATER QUALITY AND HYDROLOGY

Erosion and Sediment Control

B18. Prior to the commencement of any construction or other surface disturbance for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the *Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book* (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.

Discharge Limits

B19. The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.

Stormwater Management System

- B20. The Applicant must install and operate a stormwater management system for the development that:
 - (a) is designed by a suitably qualified and experienced person(s);
 - (b) is generally consistent with the Civil, Stormwater and Infrastructure Services Report DA Modification No.7, Rev 01, report REP005-01-15-272-MOD 7 Civil Report, prepared by AT&L, dated June 2021;
 - (c) is in accordance with applicable Australian Standards and Penrith City Council's *Design Guidelines for Engineering Works, Water Sensitive Urban Design Policy December 2013* and *Water Management Development Control Plan*;
 - (d) ensures peak stormwater flows from the site are in accordance with DA Modification No.7, Rev 01, report REP005-01-15-272-MOD 7 Civil Report, prepared by AT&L, dated June 2021;
 - (e) incorporate rainwater harvesting measures to supplement non-potable water demand for the development.
- B21. All stormwater drainage infrastructure on the site shall remain under the care, control and ownership of the registered proprietor of the lot.

BUSHFIRE PROTECTION

- B22. The Applicant must ensure the development complies with:
 - (a) the relevant provisions of *Planning for Bushfire Protection*, 2019;
 - (b) the recommendations of the Bushfire Report prepared by Blackash Bushfire Consulting dated 13 October 2021; and
 - (c) the relevant sections of Australian Standard AS3959-2018 Construction of buildings in bush fire-prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas 2014 as appropriate, and Section 7.5 of Planning for Bushfire Protection 2019.

- B23. The Applicant must ensure the part of Building 2A located in the Bushfire Attack Level (BAL) 12.5 area is constructed entirely with non-combustible materials and provided with measures to improve ember protection. Ember protection improvements include enclosing all openings (excluding roof sheet and tile spaces) or covering openings with a non-corrosive metal screen mesh with a maximum aperture of 2 mm. This includes any subfloor areas, openable windows, vents, weep holes and eaves. External doors are to be fitted with draft excluders.
- B24. The Applicant must ensure the entire site, including landscaping, is managed as an inner protection area (IPA) in accordance with *Planning for Bushfire Protection 2019*.
- B25. Prior to the commencement of operation, the Applicant must prepare a Fire Management Plan (FMP) for the development. The FMP must:
 - (a) be prepared in consultation with the NSW RFS:
 - (b) include 24-hour emergency contact details including alternative telephone contact
 - (c) include plans of site infrastructure plan, firefighting water supply, site access and internal roads;
 - (d) include implementation of asset protection zones (APZ) and on-going maintenance;
 - include location of hazards that will impact on firefighting operations and procedures to manage identified hazards during firefighting operations; and
 - (f) any additional matters required by the RFS Fire Control Centre (e.g. FMP review and updates)
- B26. The Applicant must implement the most recent version of the Fire Management Plan for the duration of the development.
- B27. Prior to the commencement of operation, the Applicant must prepare a Bushfire Emergency and Evacuation Management Plan for the development, consistent with the NSW RFS' A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan and must include planning for the early relocation of occupants.

HAZARDS AND RISK

Dangerous Goods

B28. The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's *Hazardous and Offensive Development Application Guidelines – Applying SEPP 33* at all times.

Bunding

B29. The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's *Storing and Handling of Liquids: Environmental Protection – Participants Manual* (Department of Environment and Climate Change, 2007).

AIR QUALITY

Dust Minimisation

- B30. The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.
- B31. During construction of the development, the Applicant must comply with the dust minimisation measures detailed in the Construction Environmental Management Plan required by Condition C2.

Operational Air Quality - Building 2A

- B32. Prior to the commencement of operation of Building 2A, the Applicant must prepare an Air Quality Management Plan (AQMP) for Building 2A. The AQMP must:
 - (a) be prepared by a suitably qualified and experienced person(s);
 - (b) detail all emission sources from the operation of Building 2A;
 - (c) describe a program that is capable of evaluating the performance of the operation and determining compliance with key performance indicators;
 - (d) identify the control measures that will be implemented for each emission source, including details of extractions systems and rooftop vents;
 - (e) nominate the following for each of the proposed controls:
 - (i) key performance indicator;
 - (ii) monitoring method, location, frequency and duration of monitoring;
 - (iii) response procedures; and
 - (iv) compliance monitoring.
 - Include a complaint register and response procedures
- B33. The Applicant must implement the AQMP for the duration of operation of Building 2A.

WASTE MANAGEMENT

Waste Storage

B34. Waste must always be secured and maintained within designated waste storage areas and must not leave the site onto neighbouring public or private properties.

Waste Management Plan

B35. The Applicant must implement the Waste Management Plan (WMP) in the RtS for the duration of construction and operation of the development.

Statutory Requirements

- B36. All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.
- B37. The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's *Waste Classification Guidelines Part 1: Classifying Waste* (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.
- B38. Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal.

COMMUNITY ENGAGEMENT

B39. The Applicant must consult with the community regularly throughout the development, including consultation with the nearby sensitive receivers identified in **Figure 9**, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders. Community engagement shall be undertaken in accordance with the Community Communication Strategy for the OWE.

PART C ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING

ENVIRONMENTAL MANAGEMENT

Management Plan Requirements

- C1. Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:
 - (a) details of:
 - (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions);
 - (ii) any relevant limits or performance measures and criteria; and
 - (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;
 - (b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;
 - (c) a program to monitor and report on the:
 - (i) impacts and environmental performance of the development; and
 - (ii) effectiveness of the management measures set out pursuant to paragraph (c) above;
 - (d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;
 - (e) a program to investigate and implement ways to improve the environmental performance of the development over time;
 - (f) a protocol for managing and reporting any:
 - (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria);
 - (ii) complaint;
 - (iii) failure to comply with statutory requirements; and
 - (g) a protocol for periodic review of the plan.

Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- C2. The Applicant must prepare a Construction Environmental Management Plan (CEMP) for the development in accordance with the requirements of condition C1 and to the satisfaction of the Planning Secretary.
- C3. As part of the CEMP required under Condition C2 of this consent, the Applicant must include the following:
 - (a) Construction Traffic Management Plan (see Condition B1);
 - (b) a Driver Code of Conduct (see Condition B12);
 - (c) an Erosion and Sediment Control Plan (see Condition B18); and
 - (d) a Waste Management Plan (see Condition B35).
- C4. The Applicant must:
 - (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and
 - (b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.

REVISION OF STRATEGIES, PLANS AND PROGRAMS

- C5. Within three months of:
 - (a) the submission of a Compliance Report under condition C11;
 - (b) the submission of an incident report under condition C7;
 - (c) the approval of any modification of the conditions of this consent; or
 - (d) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review,

the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review.

C6. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning

Secretary for approval within six weeks of the review required under condition C8, or such other timing as agreed by the Planning Secretary.

Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.

REPORTING AND AUDITING

Incident Notification, Reporting and Response

C7. The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant 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. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.

Non-Compliance Notification

- C8. The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.
- C9. A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.
- C10. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.

Compliance Reporting

- C11. Within six months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also:
 - (a) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
 - (b) describe what measures will be implemented over the next year to improve the environmental performance of the development.
- C12. The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.

Monitoring and Environmental Audits

C13. Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing.

Note: For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.

ACCESS TO INFORMATION

- C14. At least 48 hours before the commencement of construction of the development until the completion of all works under this consent, the Applicant must:
 - (a) make the following information and documents (as they are obtained or approved) publicly available on its website:
 - (i) the documents referred to in condition A2 of this consent;
 - (ii) all current statutory approvals for the development;
 - (iii) all approved strategies, plans and programs required under the conditions of this consent;
 - regular reporting on the environmental performance of the development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;
 - (v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
 - (vi) a summary of the current stage and progress of the development;
 - (vii) contact details to enquire about the development or to make a complaint;
 - (viii) a complaints register, updated monthly;

- (ix) the Compliance Report of the development;
- (x) any other matter required by the Planning Secretary; and
- (b) keep such information up to date, to the satisfaction of the Planning Secretary.

APPENDIX 1 DEVELOPMENT LAYOUT PLANS

	,	Architectural P	lans prepared by SBA Architects Pty Ltd	d	
Lot 2A					
Drawing		Revision	Title	Date	
OAK 2A DA000		Н	Cover Page	21 October 2021	
OAK 2A DA001		Н	Perspectives – Office 2A	21 October 2021	
OAK 2A DA010)	0	Site Plan	25 October 2021	
OAK 2A DA200)	I	Roof Plan	20 October 2021	
OAK 2A DA201		J	Floor Plans - Office	22 October 2021	
OAK 2A DA203	3	F	Floor Plans – Dock Offices	20 October 2021	
OAK 2A DA210)	N	Warehouse Elevations & Section	29 October 2021	
OAK 2A DA211		I	Elevations Office	21 October 2021	
OAK 2A DA300)	I	Signage Plan	20 October 2021	
			Lot 2C and 2D		
OAK 2C & 2D [DA000	Н	Cover Page	29 October 2021	
OAK 2C & 2D [DA001	G	Office Perspectives	29 October 2021	
OAK 2C & 2D [DA002	PF	Warehouse Perspective	28 October 2021	
OAK 2C DA20		L	Site & Warehouse Plan	16 November 2021	
OAK 2C & 2D [DA300	D	Roof Plan	15 October 2021	
OAK 2C & 2D [DA305	Е	Floor Plan – Office 2C1	28 October 2021	
OAK 2C & 2D [DA306	F	Floor Plan – Office 2C2	16 November 2021	
OAK 2C & 2D [DA307	F	Floor Plan – Office 2D	16 November 2021	
OAK 2C & 2D DA310		Н	Elevations – Warehouse 2C	29 October 2021	
OAK 2C & 2D [DA311	Н	Elevations – Warehouse 2D	29 October 2021	
OAK 2C & 2D [DA312	G	Office Elevations – 2C1	29 October 2021	
OAK 2C & 2D [DA313	G	Office Elevations – 2C2	29 October 2021	
OAK 2C & 2D [DA314	G	Office Elevations – 2D	29 October 2021	
OAK 2C & 2D [DA315	D	Sections - Warehouse	28 October 2021	
OAK 2C DA400)	Е	Signage Plan	16 November 2021	
		Landscape Pl	ans prepared by Scape Design Pty Ltd		
Drawing	Revision	Title		Date	
L.SK.00	Н	Cover She	eet	23 November 2021	
L.SK.01	SK.01 F Landscape S		e Sketch Plan – Lot 2A	1 November 2020	
SK.02			e Sketch Plan – Lot 2C & 2D	23 November 2021	
SK.03	F	Planting P	lan – Lot 2A	1 November 2020	
L.SK.04			lan – Lot 2C & 2D	23 November 2021	
		chedule – Lot 2A	1 November 2020		
		chedule – Lot 2C & 2D	23 November 2021		
SK.07 D Character &		Character	& Materials	23 November 2021	
		Landscape	e – Detailed Plan & Notes – Lot 2A	1 November 2020	

Landscape Plans prepared by Scape Design Pty Ltd				
L.SK.106	D	Landscape - Detailed Plan & Notes - Lot 2C & 2D	23 November 2021	
L.SK.200	F	Carpark Details	23 November 2021	
L.SK.201	Е	Landscape – Typical Street Sections – Lot 2A	1 November 2020	
L.SK.202	D	Landscape – Typical Street Sections – Lot 2C & 2D	23 November 2021	

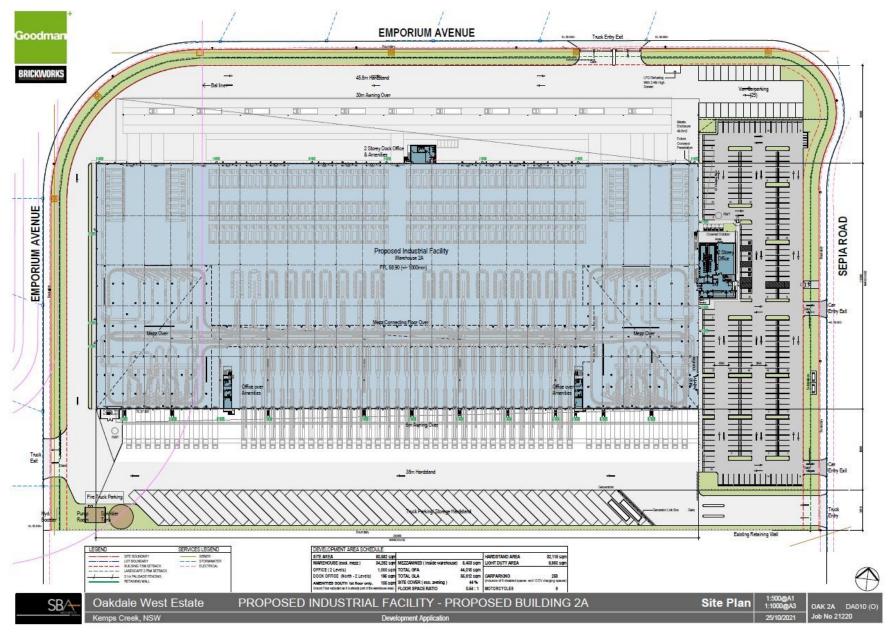


Figure 1: Building 2A Site Plan

19

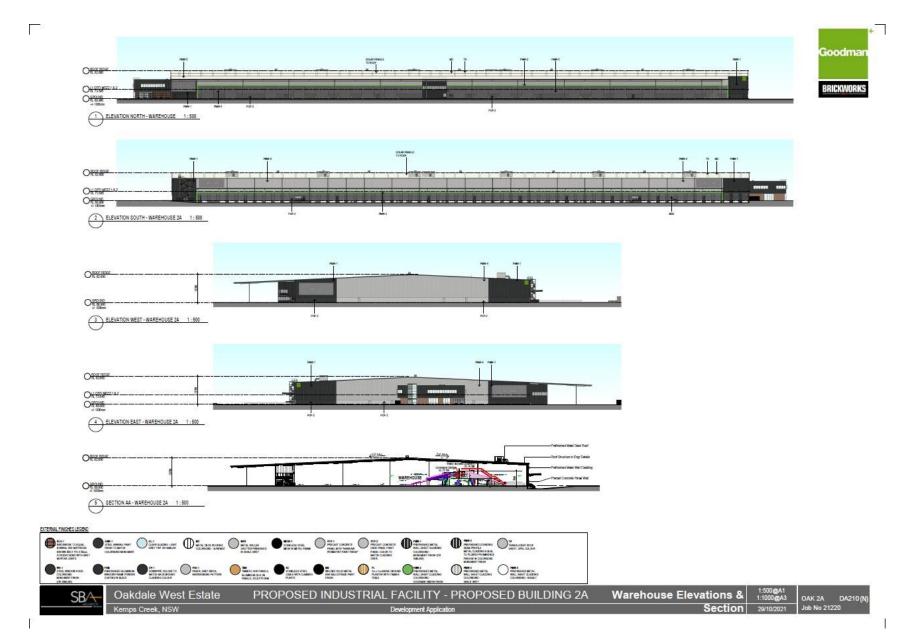


Figure 2: Building 2A Warehouse Elevations

20



Figure 3: Building 2A Office Elevations

21

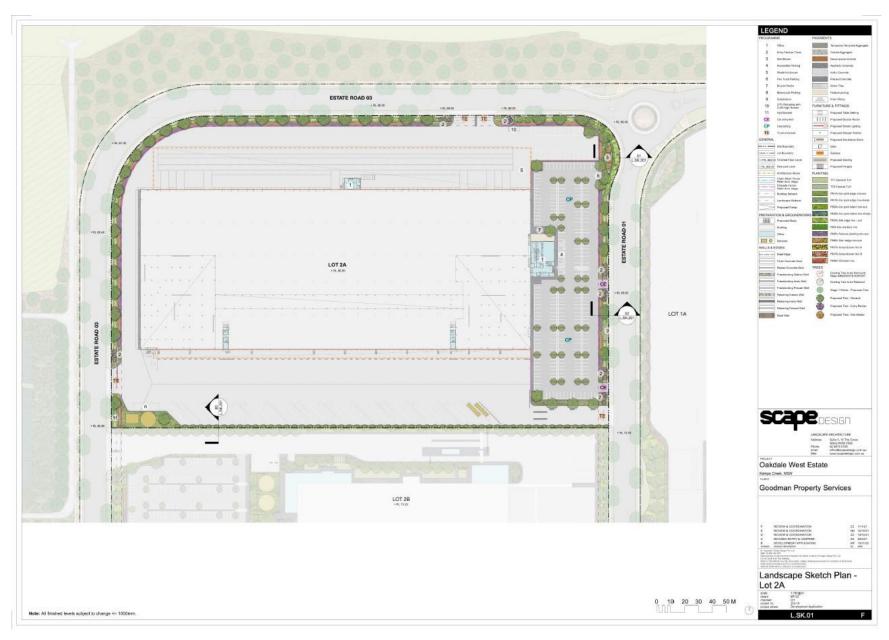


Figure 4: Building 2A Landscape Plan

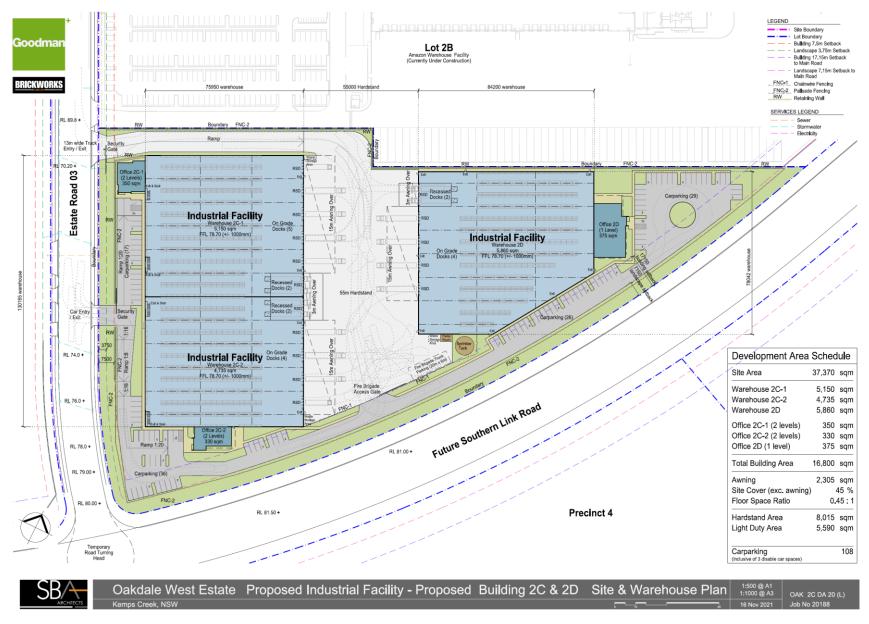


Figure 5: Building 2C and 2D Site Plan



Figure 6: Building 2C Elevations

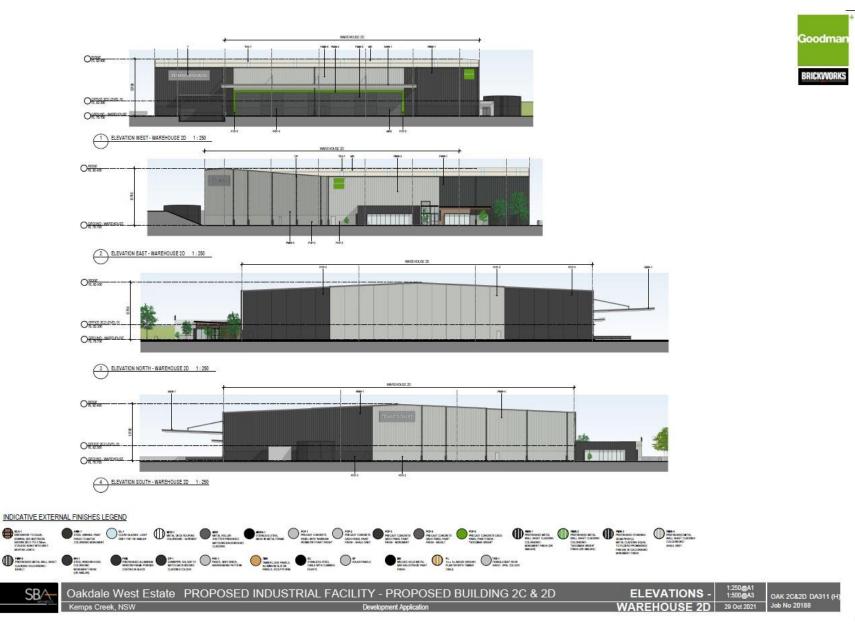


Figure 7: Building 2D Elevations

00-8



Figure 8: Building 2C and 2D Landscape Plan

APPENDIX 2 SENSITIVE RECEIVERS

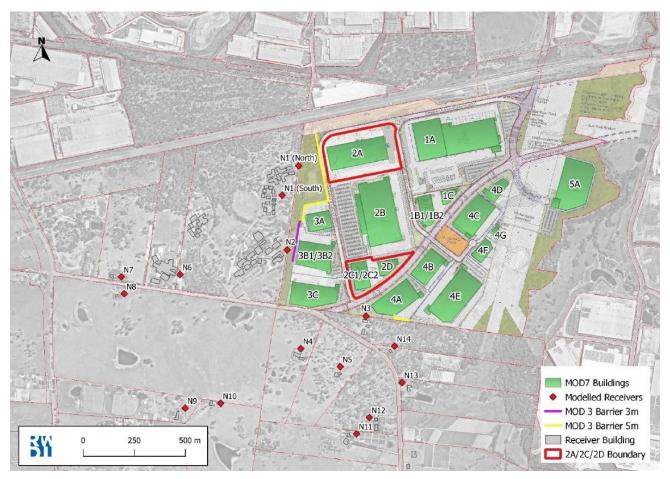


Figure 9: Sensitive Receiver Locations

APPENDIX 3 APPLICANT'S MANAGEMENT AND MITIGATION MEASURES

Issue	Mitigation measures
General	 preparation of updated CEMP for OWE Stage 3 Developments preparation of updated OEMP for OWE Concept Proposal for Stage 3
Visual amenity	 the existing vegetation on the eastern, southern and western boundary will be retained where possible to assist filtering views to the proposed buildings warehouses have been articulated to reduce the overall visual impact of the development from surrounding viewpoints the proposed material palette assists in articulating the built form and providing consistent materials within the OWE the proposed landscape design is consistent with the OWE landscape masterplan and provides vegetated setbacks to estate roads and within parking areas to provide shade
Traffic and transport	 construction traffic management measures to be described in the CEMP use of WNSLR for construction traffic detailed STP to be implemented
Noise and vibration	 minimising coinciding use of noisy plant items shutting down intermittently used equipment when not in use regular compliance checks on the noise emissions of all plant and machinery non-tonal reversing alarms used on all items of plant and heavy vehicles equipment oriented away from sensitive receivers pre-construction and ongoing consultation with adjoining sensitive receivers
Soil and water	CEMP to include erosion and sediment controls consistent with the requirements of Landcom (2004)
Waste management	 implementation of the Stage 3 Waste Management Plan recycling of packaging and pallets where possible
Air quality	 CEMP to include standard air quality control measures, contingency plans and response procedures and suitable reporting and performance monitoring procedures CEMP to include standard odour mitigation measures for construction including keeping excavation surfaces moist, covering excavation faces and/or stockpiles, use of soil vapour extraction systems and regular monitoring of discharges as appropriate Operational air quality management in Building 2A to include: vehicles will not be left to 'idle' while loading/unloading (appropriate signage is required). no refuelling is to occur inside the building. building air pollutants will be captured by a BCA and AS1668.2-2012 compliant extractions system and directed to rooftop vents. locating exhaust as far as practicable from the sources of make-up air to ensure effluents are effectively removed from all paRtS of the enclosure effluent shall be collected as it is produced, as close as practicable to the source of generation objectionable air discharges shall be:
Energy efficiency	 use of a 750 kW photovoltaic solar system in Building 2A use of a 300 kW photovoltaic solar system in Buildings 2C and 2D embodied carbon offset strategy use of low energy LED lighting with zone controls via motion sensors maximise the access to natural lighting, particularly in offices use of efficient air conditioning systems design of facades and roofing to comply with NCC performance requirements installing 4-star rated toilets, urinals and taps and rainwater harvesting facility

	 a Building Users' Guide to provide details regarding the everyday operation of a building, include energy minimisation initiatives quarterly reviews to verify the performance of energy and water efficiency measures
BCA	 preparation of the Performance Solutions and corresponding fire safety measures during detailed design to ensure compliance with BCA and International Fire Engineering Guidelines
Fire safety	 preparation of Performance Solutions and fire safety measures in the detailed design phase
Bushfire	 establish and maintain asset protection zones as indicated in the BHA provide fire hydrants in accordance with the BCA buildings to be constructed in accordance with AS 3959 Construction of buildings in bushfire-prone areas and measures outlined in the BHA

APPENDIX 4 INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

WRITTEN INCIDENT NOTIFICATION REQUIREMENTS

- A written incident notification addressing the requirements set out below must be submitted to the Planning Secretary
 via the Major Projects website within seven days after the Applicant becomes aware of an incident. Notification is
 required to be given under this condition even if the Applicant fails to give the notification required under condition C7
 or, having given such notification, subsequently forms the view that an incident has not occurred.
- 2. Written notification of an incident must:
 - a. identify the development and application number;
 - b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
 - c. identify how the incident was detected;
 - d. identify when the applicant became aware of the incident;
 - e. identify any actual or potential non-compliance with conditions of consent;
 - f. describe what immediate steps were taken in relation to the incident;
 - g. identify further action(s) that will be taken in relation to the incident; and
 - h. identify a project contact for further communication regarding the incident.

INCIDENT REPORT REQUIREMENTS

- 3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further repoRtS as may be requested.
- 4. The Incident Report must include:
 - a. a summary of the incident;
 - b. outcomes of an incident investigation, including identification of the cause of the incident;
 - details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
 - d. details of any communication with other stakeholders regarding the incident.

APPENDIX B

Consultation

From: Justine Clarke < Justine.Clarke@waternsw.com.au>

Sent: Thursday, 13 October 2022 5:02 PM

To: Mack Bowman

Cc:Adrian Tesoriero; Caitlin D'Arcy; Stephanie Partridge; Alasdair CameronSubject:WaterNSW response - Oakdale West - Lot 2C & 2D CEMP Consultation

Dear Mack

Thank you for providing WaterNSW with the opportunity to comment on the Oakdale West Building 2C & 2D CEMP.

WaterNSW acknowledge receipt of this document.

WaterNSW has no specific comment to make on this CEMP, as it is not expected to impact on the Warragamba Pipelines corridor, if the controls within are adequately applied. This includes the conditions of consent within SSD-7348.

I trust this information enables you to meet your consultation requirements.

Regards Justine

Justine Clarke

Catchment and Asset Protection Adviser



Level 14, 169 Macquarie Street

PO Box 398

Parramatta NSW 2150

M: 0457 535 955

justine.clarke@waternsw.com.au

www.waternsw.com.au

From: Mack Bowman < Mack. Bowman@goodman.com>

Sent: Monday, 10 October 2022 4:46 PM

To: Justine Clarke < Justine. Clarke@waternsw.com.au>

Cc: Adrian Tesoriero <Adrian.Tesoriero@goodman.com>; Caitlin D'Arcy <Caitlin.DArcy@goodman.com>; Stephanie

Partridge <Stephanie.Partridge@goodman.com>; Alasdair Cameron <Alasdair.Cameron@goodman.com>

Subject: ARK: Oakdale West - Lot 2C & 2D CEMP Consultation

This Message Is From an External Sender

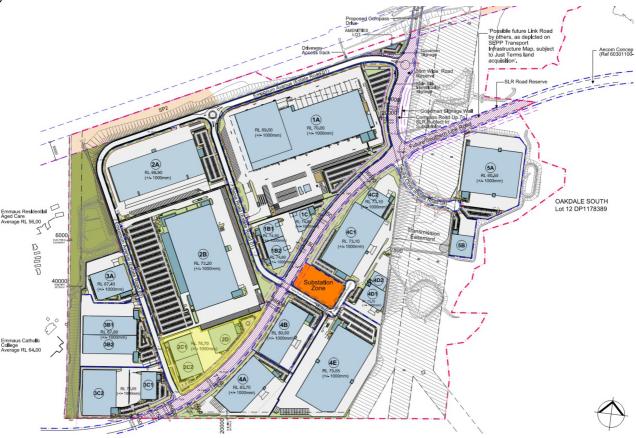
This message came from outside your organization.

Be careful opening emails, attachments and links from unknown senders.

Dear Justine,

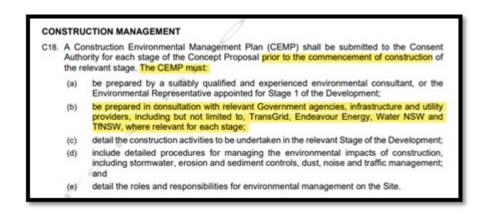
As discussed, I refer to our previous correspondence concerning our Oakdale West Estate (OWE) development approved under SSD7348 at Eastern Creek.

We are beginning construction of 2 Warehouses within Oakdale West Estate shortly, Lots 2C & 2D highlighted in yellow below:



The SSD7348 consent requires us to consult with you on the following documents concerning the construction of Lot 2C & 2D based off the following condition from the Estate SSD:

We note the contents of this CEMP is aligned with previously submitted documents.



 Construction Environmental Management Plan (CEMP) (this lists out proposed construction management of Lot 2C & 2D).

https://spaces.hightail.com/receive/jOuVzuXL5h

As we're hoping to start construction as soon as possible, we'd be grateful for your comments.

If you have nothing to add, a simple "No comment" response would satisfy the consultation requirement and enable us to get these documents finalised and issued to the Department.

Your help is much appreciated. Please let me know if you have any questions.

Kind Regards,

Mack.



Mack Bowman Assistant Project Manager Mack.Bowman@goodman.com

T. +61 2 9230 7267 M. +61 402 701 216

The Hayesbery 1-11 Hayes Road Rosebery NSW 2018 Australia www.goodman.com







Goodman Limited ABN 69 000 123 071
Goodman Funds Management Limited ABN 48 067 796 641 AFSL Number 223621
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From: Timothy Cowdroy <Timothy.Cowdroy@transgrid.com.au>

Sent: Tuesday, 11 October 2022 3:07 PM

To: Mack Bowman

Cc: Michael Platt; Adrian Tesoriero; Caitlin D'Arcy; Stephanie Partridge; Alasdair

Cameron; Easements&Development

Subject: RE: Oakdale West - Lot 2C & 2D CEMP Consultation [Official]

Hi Mack,

Thank you for your consultation this afternoon in respect of Lots 2C & 2D of the Oakdale West development.

Transgrid confirms there are no issues or concerns to be raised by Transgrid as the subject Lots are well clear of our transmission lines and associated easements.

Should you have any queries, please feel free to contact me on 0408 192 165.

Kind regards

Tim

Tim Cowdroy

Land Economist | Land and Property | Delivery

Transgrid | 200 Old Wallgrove Road, Eastern Creek NSW 2766

T: (02) 9620 0765 M: 0408 192 165

E: Timothy.Cowdroy@transgrid.com.au **W:** www.transgrid.com.au





Data Classification: Official

From: Mack Bowman < Mack. Bowman@goodman.com >

Sent: Tuesday, 11 October 2022 2:57 PM

To: Easements&Development < Easements&Development@transgrid.com.au>

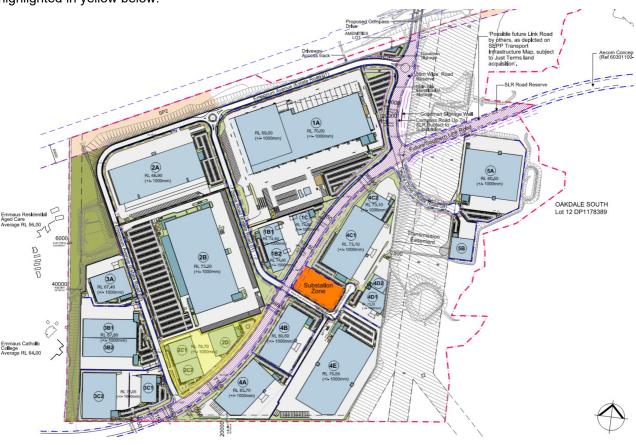
Cc: Michael Platt <Michael.Platt@transgrid.com.au>; Timothy Cowdroy <Timothy.Cowdroy@transgrid.com.au>; Adrian Tesoriero <Adrian.Tesoriero@goodman.com>; Caitlin D'Arcy <Caitlin.DArcy@goodman.com>; Stephanie Partridge <Stephanie.Partridge@goodman.com>; Alasdair Cameron <Alasdair.Cameron@goodman.com>

Subject: Oakdale West - Lot 2C & 2D CEMP Consultation

Dear Tim,

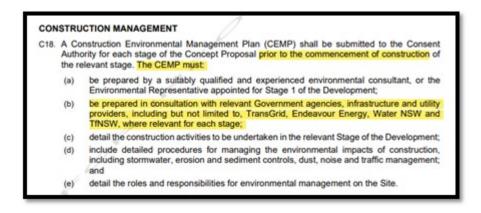
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https://spaces.hightail.com/receive/jOuVzuXL5h

As we're hoping to start construction as soon as possible, we'd be grateful for your comments.

If you have nothing to add, a simple "No comment" response would satisfy the consultation requirement and enable us to get these documents finalised and issued to the Department.

Your help is much appreciated. Please let me know if you have any questions.

Kind Regards,

Mack.



Mack Bowman Assistant Project Manager Mack.Bowman@goodman.com

T. +61 2 9230 7267 M. +61 402 701 216

The Hayesbery 1-11 Hayes Road Rosebery NSW 2018 Australia www.goodman.com







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Goodman Funds Management Limited ABN 48 067 796 641 AFSL Number 223621
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From: Ashwin Prasad < Ashwin. Prasad 2@endeavourenergy.com.au >

Sent: Wednesday, 12 October 2022 7:45 PM

To: Alasdair Cameron

Cc: Mack Bowman; Jason Lu; Hassan Gul

Re: Oakdale West - Lot 2C & 2D CEMP Consultation Subject:

Hi Alasdair,

Confirming we have no comments on this one.

Thanks, Ashwin

From: Alasdair Cameron <Alasdair.Cameron@goodman.com>

Sent: Tuesday, October 11, 2022 2:52 pm

To: Ashwin Prasad <Ashwin.Prasad2@endeavourenergy.com.au>

Cc: Mack Bowman <Mack.Bowman@goodman.com>; Jason Lu <Jason.Lu@endeavourenergy.com.au>

Subject: FW: Oakdale West - Lot 2C & 2D CEMP Consultation

Hi Ashwin,

I hope you are well.

Not sure if Jason is the correct contact.

Please could you assist by directing it to or letting us know who we should send these enquiries to. Alasdair



Alasdair Cameron Senior Project Manager - Infrastructure Alasdair.Cameron@goodman.com

T. +61 2 9230 7289 M. +61 402 458 226

The Hayesbery 1-11 Hayes Road Rosebery NSW 2018 Australia www.goodman.com









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From: Mack Bowman < Mack. Bowman@goodman.com >

Sent: Tuesday, 11 October 2022 3:46 PM To: Jason.Lu@endeavourenergy.com.au

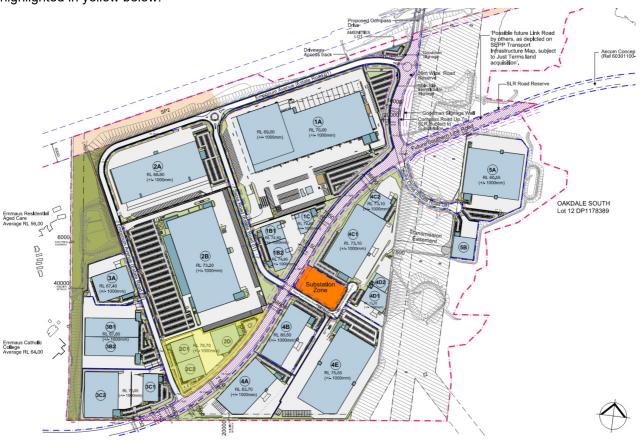
Cc: Adrian Tesoriero <Adrian.Tesoriero@goodman.com>; Caitlin D'Arcy <Caitlin.DArcy@goodman.com>; Stephanie Partridge <Stephanie.Partridge@goodman.com>; Alasdair Cameron <Alasdair.Cameron@goodman.com>

Subject: Oakdale West - Lot 2C & 2D CEMP Consultation

Dear Jason,

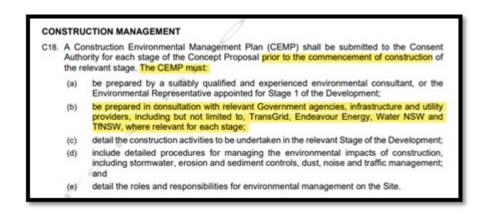
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Your help is much appreciated. Please let me know if you have any questions.
Kind Regards,
Mack.

Kathryn Saunders < kathryn.saunders@penrith.city> From:

Sent: Friday, 14 October 2022 3:27 PM

To: Mack Bowman **Gavin Cherry** Cc:

Subject: RE: Oakdale West - Lot 2C & 2D CEMP Consultation

Thanks Mack, all received. Council will review and be in touch.

Regards,

Kathryn Saunders

Principal Planner

E kathryn.saunders@penrith.city T <u>+61247328567</u> | F | M PO Box 60, PENRITH NSW 2751 www.visitpenrith.com.au www.penrithcity.nsw.gov.au









From: Mack Bowman < Mack. Bowman@goodman.com>

Sent: Friday, 14 October 2022 3:24 PM

To: Kathryn Saunders <kathryn.saunders@penrith.city>

Cc: Gavin Cherry <gavin.cherry@penrith.city>

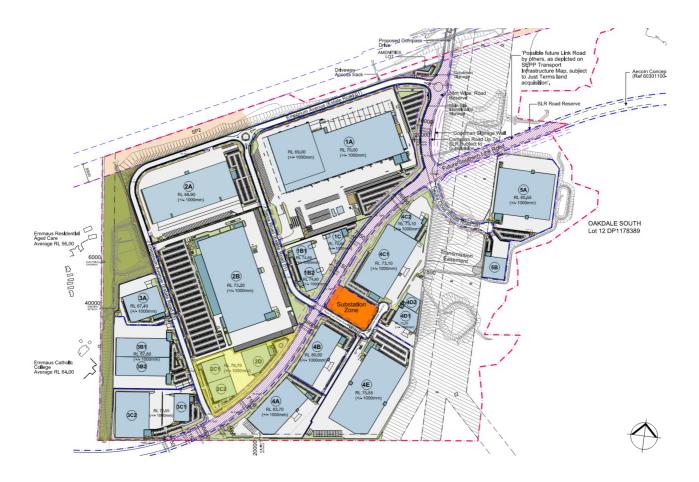
Subject: Oakdale West - Lot 2C & 2D CEMP Consultation

EXTERNAL EMAIL: This email was received from outside the organisation. Use caution when clicking any links or opening attachments.

Dear Kathryn,

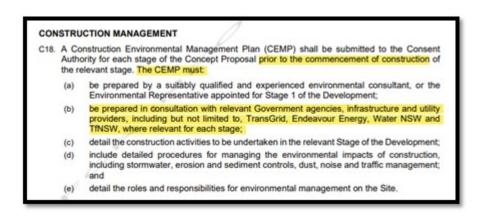
As discussed, I refer to our previous correspondence concerning our Oakdale West Estate (OWE) development approved under SSD7348 at Eastern Creek.

We are beginning construction of 2 Warehouses within Oakdale West Estate shortly, namely Lots 2C & 2D highlighted in yellow below:



The SSD7348 consent requires us to consult with you on the following documents concerning the construction of Lot 2C & 2D based off the following condition from the Estate SSD:

We note the contents of this CEMP is aligned with previously submitted documents.



 Construction Environmental Management Plan (CEMP) (this lists out proposed construction management of Lot 2C & 2D).

https://spaces.hightail.com/receive/jOuVzuXL5h

As we're hoping to start construction as soon as possible, we'd be grateful for your comments.

If you have nothing to add, a simple "No comment" response would satisfy the consultation requirement and enable us to get these documents finalised and issued to the Department.

Your help is much appreciated. Please let me know if you have any questions.

Kind Regards,

Mack.



Mack Bowman Assistant Project Manager Mack.Bowman@goodman.com

T. +61 2 9230 7267 M. +61 402 701 216

The Hayesbery 1-11 Hayes Road Rosebery NSW 2018 Australia www.goodman.com







Goodman Limited ABN 69 000 123 071
Goodman Funds Management Limited ABN 48 067 796 641 AFSL Number 223621
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From: Mack Bowman < Mack.Bowman@goodman.com>

Sent: Monday, 10 October 2022 4:46 PM

To: Joe Morabito

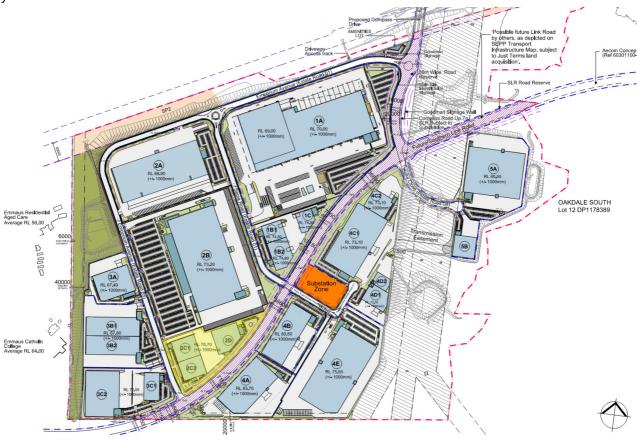
Cc: Adrian Tesoriero; Caitlin D'Arcy; Stephanie Partridge; Alasdair Cameron

Subject: Oakdale West - Lot 2C & 2D CEMP Consultation

Dear Joe,

As discussed, I refer to our previous correspondence concerning our Oakdale West Estate (OWE) development approved under SSD7348 at Eastern Creek.

We are beginning construction of 2 Warehouses within Oakdale West Estate shortly, Lots 2C & 2D highlighted in yellow below:



The SSD7348 consent requires us to consult with you on the following documents concerning the construction of Lot 2C & 2D based off the following condition from the Estate SSD:

We note the contents of this CEMP is aligned with previously submitted documents.

CONSTRUCTION MANAGEMENT C18. A Construction Environmental Management Plan (CEMP) shall be submitted to the Consent Authority for each stage of the Concept Proposal prior to the commencement of construction of the relevant stage. The CEMP must: (a) be prepared by a suitably qualified and experienced environmental consultant, or the Environmental Representative appointed for Stage 1 of the Development; (b) be prepared in consultation with relevant Government agencies, infrastructure and utility providers, including but not limited to, TransGrid, Endeavour Energy, Water NSW and TfNSW, where relevant for each stage; (c) detail the construction activities to be undertaken in the relevant Stage of the Development; include detailed procedures for managing the environmental impacts of construction, including stormwater, erosion and sediment controls, dust, noise and traffic management; and (e) detail the roles and responsibilities for environmental management on the Site.

 Construction Environmental Management Plan (CEMP) (this lists out proposed construction management of Lot 2C & 2D).

https://spaces.hightail.com/receive/jOuVzuXL5h

As we're hoping to start construction as soon as possible, we'd be grateful for your comments.

If you have nothing to add, a simple "No comment" response would satisfy the consultation requirement and enable us to get these documents finalised and issued to the Department.

Your help is much appreciated. Please let me know if you have any questions.

Kind Regards,

Mack.

APPENDIX C

Environmental Policy



(DOC.IMS.PCY.02) Version 7.0 Correct as at 24/03/22

ENVIRONMENTAL POLICY STATEMENT

The Management of Prime Constructions Pty Ltd is committed to building in an environmentally responsible manner for all the company's design and construction activities. Prime Constructions Pty Ltd recognises that as a service organisation we can minimise the negative impact on the environment in many small ways and although legal compliance is regarded as a minimum standard, our objective is to encourage and ensure our activities are beyond statutory regulations, which conserve and protect the environment and support business goals.

To achieve this, the Board of Directors of Prime Constructions Pty Ltd have prescribed that the company institute and maintain an IMS that encompasses appropriate commercially responsible and sustainable management practices that will drive the following:

- to plan our projects to incorporate responsible environmental management principles and practices into the design, construction, and maintenance of our operations.
- to provide training and information to our employees to enable them to implement the environmental principles of our Policy.
- to achieve compliance with all relevant legal requirements, Councils, and consent conditions.
- to select materials that are safe, able to be recycled, have low embodied energy, and reduce the impact on resources depletion.
- to control pollution, hazardous material, and dangerous goods. Minimise waste and ecological impact.
- the protection of flora and fauna and items of archaeological or heritage significance.
- that trees to be retained are healthy at completion of works.
- the conservation of natural resources.
- to report on our performance and use this data to assist in continual improvement of our environmental management.
- to ensure that we are meeting the requirements of ISO 14001:2015 Environmental Management Systems and to ensure that our IMS is effective, and our policy is reviewed during our Management Review Meetings.

All Subcontractors and their employees are required to undertake their responsibilities in compliance with the environmental requirements of Prime Constructions Pty Ltd IMS.

P. J. de Gail

Prime Constructions Pty Ltd

Executive Chairman

Paul Christopher

Prime Constructions Pty Ltd

Managing Director - Construction

APPENDIX D

Relevant Conditions of Consent

 Table A
 Development Consent SSD 9794683

Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP	
PART A – ADMINISTRATIVE CONDITIONS		
Obligation to Minimise Harm to the Environment		
A1. In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the development, and any rehabilitation required under this consent.	Section 4.1	
Terms of Consent		
A2. The development may only be carried out: a) in compliance with the conditions of this consent; b) in accordance with all written directions of the Planning Secretary; c) in accordance with the EIS and RtS; d) in accordance with the Development Layout in Appendix 1; and e) in accordance with the management and mitigation measures in Appendix 3. A4. The conditions of this consent and directions of the Planning Secretary prevail to the	Noted	
extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2(c) or A2(e). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c) or A2(e), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Noted	
Limit of Consent		
Development Controls A6. The total area of warehousing and office space at the development must not exceed the following maximum gross lettable area: a) Building 2A – 35,612 square metres; b) Building 2C – 10,565 square metres; and c) Building 2D – 6,235 square metres.	Section 4.1	

Relevant Consent Cond	ditions SSD 9794683	Where Addressed in CEMP
A7. The development must be consistent with the Table 1 .		
Table 1: Development Controls		
Development Aspect		
Minimum building setbacks from:	•	
Southern Link Road	17.15 m	
Compass Drive	20 m	
Local Estate Roads	7.5 m	
Western site boundary	40 m	
Southern site boundary	20 m (excluding parking areas)	
Rear boundary setbacks within the estate	• 5 m	Section 4.8
Side boundary setbacks within the estate	0 m, subject to compliance with fire rating requirements	3ection 4.8
Height	• 15 m	
Building 1A	• 39 m	
Building 2A	• 18 m	
Building 2B	• 28 m	
Building 2C	• 22.2 m	
Minimum lot size	• 5,000 m2	
Minimum frontage	40 m (excluding cul-de-sacs)	
	35 m minimum lot width at the building line	
Site coverage	Maximum of 65 per cent (excluding awnings)	
A8. Notwithstanding the controls listed in Table 1 the development, except Buildings 2A and 2C in F 13.7 m, excluding roof mounted mechanical plans	Precinct 2, shall exceed a ridgeline height of	Section 4.8
Notification of Commencement		
A9. The date of commencement of each of the for notified to the Planning Secretary in writing, at less otherwise agreed with the Planning Secretary: (a) construction; (b) operation; and		Noted
(c) cessation of operations;		
A10. If the construction or operation of the devel Secretary must be notified in writing, at least one stage (or other timeframe agreed with the Planni and the development to be carried out in that states		
		Noted



Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP		
Evidence of Consultation			
 A11. Where conditions of this consent require consultation with an identified party, the Applicant must: a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and b) provide details of the consultation undertaken including: the outcome of that consultation, matters resolved and unresolved; and details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved. 	Section 1.2.3		
Protection of Public Infrastructure			
A15.Before the commencement of construction of the development, the Applicant must consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure.	Noted. This will be completed by Goodman.		
A16.Unless the Applicant and the applicable authority agree otherwise, the Applicant must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by carrying out the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Noted		
Structural Adequacy			
 A17. All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the development, must be constructed in accordance with the relevant requirements of the BCA. Note: Under Part 6 of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the development. 	Section 4.1 Engineering design and construction certification will ensure this		
Compliance			
A18. The Applicant must ensure that all of its employees, contractors (and their subcontractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Section 3.4		
Operation Of Plant And Equipment			
 A20. All plant and equipment used on site, or to monitor the performance of the development must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner. 	Section 4.1		
External Walls and Cladding			
A21. The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.	Section 4.1		



Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP
 A22. Prior to the issuing of: a) any Construction Certificate relating to the construction of external walls (including the installation of finishes and claddings such as synthetic or aluminium composite panels); and b) an Occupation Certificate, the Applicant must provide the Certifier with documented evidence that the products and systems proposed for use or used in the construction of external walls (including finishes and claddings such as synthetic or aluminium composite panels) comply with the requirements of the BCA. 	Noted
A23. The Applicant must provide a copy of the documentation given to the Certifier to the Planning Secretary within seven days after the Certifier accepts it.	Noted
Utilities And Services	
A24. Before the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	Noted
Advisory Notes	
AN1. All licences, permits, approvals and consents as required by law must be obtained and maintained as required for the development. No condition of this consent removes any obligation to obtain, renew or comply with such licences, permits, approvals and consents.	Section 4.1
SCHEDULE B: ENVIRONMENTAL PERFORMANCE CONDITIONS	
TRAFFIC AND ACCESS	
Construction Traffic Management Plan	
B1. Prior to the commencement of construction of the development, the Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must: (a) be prepared by a suitably qualified and experienced person(s); (b) detail the measures that are to be implemented to ensure road safety and network efficiency during construction; (c) detail heavy vehicle routes, access and parking arrangements; (d) include a Driver Code of Conduct (see Condition B13); (e) include a program to monitor the effectiveness of these measures; and (f) if necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	Section 4.5
B2. The Applicant must: (a) not commence construction until the Construction Traffic Management Plan required by condition B1 is approved by the Planning Secretary; and (b) implement the most recent version of the Construction Traffic Management Plan approved by the Planning Secretary for the duration of construction.	Section 4.5
Parking	
B3. The Applicant must provide sufficient parking facilities on site for heavy vehicles and for site personnel, to ensure that traffic associated with the development does not utilise public and residential streets or public parking facilities.	Noted



Rele	vant Consent Conditions SSD 9	9794683 	Where Addressed in CEMP
NOISE			
Hours of Work			
B7. The Applicant must comply writing by the Planning Secreta Table 2 Hours of Work Activity Construction Operation		Time 7 am to 6 pm 8 am to 1 pm 24 hours	Section 4.2
 B8. Works outside of the hours identified in condition B20 may be undertaken in the following circumstances: a) works that are inaudible at the nearest sensitive receivers; b) works agreed to in writing by the Planning Secretary; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm. 			Section 4.2
Construction Noise Limits			
B11. The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009) (as may be updated or replaced from time to time). 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 in the Appendix 3.			CNVMP
Road Traffic Noise			
B12. Prior to the commencement of construction of the development, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the development.			Section 4.2
VISUAL AMENITY			
Building Design			
B13. The Applicant must const shown on the figures in Append	_	in accordance with the RtS and as	Section 4.8
Landscaping			
B14. Prior to the commenceme implement the Landscape Plan		• •	Noted
Lighting			
outdoor lighting (Standard	ersion of AS 4282-2019 - Cont s Australia, 2019); and directed in such a manner tha		Section 4.8



	Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP	
Signage	and Fencing		
	signage and fencing must be erected in accordance with the development plans d in the EIS.	Section 4.8	
Note: The fencing.	nis condition does not apply to temporary construction and safety related signage and	3ection 4.6	
SOILS, V	VATER QUALITY AND HYDROLOGY		
Erosion	and Sediment Control		
B18. Prior to the commencement of any construction or other surface disturbance for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.		Section 4.6	
Dischar	ge Limits		
	e development must comply with section 120 of the POEO Act, which prohibits the n of waters, except as expressly provided for in an EPL.	Section 4.6	
Stormw	ater Management System		
	e Applicant must install and operate a stormwater management system for the ment that: is designed by a suitably qualified and experienced person(s); is generally consistent with the Civil, Stormwater and Infrastructure Services Report DA Modification No.7, Rev 01, report REP005-01-15-272-MOD 7 Civil Report, prepared by AT&L, dated June 2021; is in accordance with applicable Australian Standards and Penrith City Council's Design Guidelines for Engineering Works, Water Sensitive Urban Design Policy December 2013 and Water Management Development Control Plan; ensures peak stormwater flows from the site are in accordance with DA Modification No.7, Rev 01, report REP005-01-15-272-MOD 7 Civil Report, prepared by AT&L, dated June 2021; incorporate rainwater harvesting measures to supplement non-potable water demand for the development.	Section 4.6	
	stormwater drainage infrastructure on the site shall remain under the care, control nership of the registered proprietor of the lot.	Noted	
BUSHFIRE PROTECTION			
a) the b) the date c) the fire- Con	e Applicant must ensure the development complies with: relevant provisions of Planning for Bushfire Protection, 2019; recommendations of the Bushfire Report prepared by Blackash Bushfire Consulting ed 13 October 2021; and relevant sections of Australian Standard AS3959-2018 Construction of buildings in bush-prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed struction in Bushfire Areas – 2014 as appropriate, and Section 7.5 of Planning for hfire Protection 2019.	Noted	



	lana and an
Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP
B23. The Applicant must ensure the part of Building 2A located in the Bushfire Attack Level (BAL) 12.5 area is constructed entirely with non-combustible materials and provided with measures to improve ember protection. Ember protection improvements include enclosing all openings (excluding roof sheet and tile spaces) or covering openings with a noncorrosive metal screen mesh with a maximum aperture of 2 mm. This includes any subfloor areas, openable windows, vents, weep holes and eaves. External doors are to be fitted with draft excluders.	Noted
B24. The Applicant must ensure the entire site, including landscaping, is managed as an inner protection area (IPA) in accordance with Planning for Bushfire Protection 2019.	Noted
HAZARD AND RISK	
Dangerous Goods	
B28. The quantities of dangerous goods stored and handled at the site must be below the threshold quantities listed in the Department of Planning's Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 at all times.	Section 4.10
Bunding	
B29. The Applicant must store all chemicals, fuels and oils used on-site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual (Department of Environment and Climate Change, 2007).	Section 4.10
AIR QUALITY	
Dust Minimisation	
B30. The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Section 4.4
B31. During construction of the development, the Applicant must comply with the dust minimisation measures detailed in the Construction Environmental Management Plan required by Condition C2.	Section 4.4
WASTE MANAGEMENT	
Waste Storage	
B34. Waste 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.	Section 4.7
Waste Management Plan	
B35. The Applicant must implement the Waste Management Plan (WMP) in the EIS for the duration of construction and operation of the development.	Section 4.7
Statutory Requirements	
B36. All waste materials removed from the site must only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Section 4.7
B37. The Applicant must assess and classify all liquid and non-liquid wastes to be taken off site in accordance with the latest version of EPA's Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014) and dispose of all wastes to a facility that may lawfully accept the waste.	Section 4.7
B38. Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal.	Section 4.7

	Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP	
СО	MMUNITY ENGAGEMENT		
inc reg Cor	The Applicant must consult with the community regularly throughout the development, uding consultation with the nearby sensitive receivers identified in Figure 9, relevant ulatory authorities, Registered Aboriginal Parties and other interested stakeholders. In accordance with the Community engagement shall be undertaken in accordance with the Community engagement shall be undertaken in accordance with the Community engagement shall be undertaken in accordance with the Community engagement shall be undertaken in accordance with the Community engagement shall be undertaken in accordance with the Community engagement shall be undertaken in accordance with the Community engagement shall be undertaken in accordance with the Community engagement.	Section 1.2.3 and Section 4.12	
PA	RT C – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING		
EN	/IRONMENTAL MANAGEMENT		
Ma	nagement Plan Requirements		
C1.	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: details of: (i) the relevant statutory requirements (including any relevant approval, licence or lease		
	conditions); (ii) any relevant limits or performance measures and criteria; and		
	 the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, Building 2A or any management measures; 		
b)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;		
c)	a program to monitor and report on the:		
	(i) impacts and environmental performance of the development; and	C+: 4 2 4	
	(ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Section 1.2.1	
d)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;		
e)	a program to investigate and implement ways to improve the environmental performance of the development over time;		
f)	a protocol for managing and reporting any:		
	 (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); 		
	(ii) complaint;		
g)	(iii) failure to comply with statutory requirements; and a protocol for periodic review of the plan.		
No	e: The Planning Secretary may waive some of these requirements if they are ecessary or unwarranted for particular management plans		
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN			
acc	The Applicant must prepare a Construction Environmental Management Plan (CEMP) in ordance with the requirements of Condition C1 and to the satisfaction of the Planning retary.	This document	
	As part of the CEMP required under Condition C2 of this consent, the Applicant must ude:		
a) b)	measures for managing construction traffic as detailed in Appendix 2; a Driver Code of Conduct (see Condition B6);	Section 1.2.1	
c) d)	an Erosion and Sediment control Plan (see Condition B12); and measures to protect retained native vegetation adjacent to the site (see Condition B36).		



Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP
C4. The Applicant must: (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and (b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time.	Noted
REVISION OF STRATEGIES, PLANS AND PROGRAMS	
 C5. Within three months of: a) the submission of a Compliance Report under condition C11; b) the submission of an incident report under condition C7; c) the approval of any modification of the conditions of this consent; or d) the issue of a direction of the Planning Secretary under condition A2(b) which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary must be notified in writing of the outcomes of any review. 	Section 6
C6. If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary. Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review. Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.	Noted
REPORTING AND AUDITING	
Incident Notification, Reporting and Response	
C7. The Planning Secretary must be notified in writing via the Major Projects website immediately after the Applicant 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. Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Appendix 4.	Sections 3.5 and 5.2
Non-Compliance Notification	
C8. The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.	Sections 3.5 and 5.2
C9. A non-compliance notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Noted
C10. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Noted



Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP
Compliance Reporting	
C11. Within six months after the first year of commencement of operation of the development, and in the same month each subsequent year (or such other timing as agreed by the Planning Secretary), the Applicant must submit a Compliance Report to the Planning Secretary reviewing the environmental performance of the development to the satisfaction of the Planning Secretary. Compliance Reports must be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) and must also: a) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and b) describe what measures will be implemented over the next year to improve the environmental performance of the development.	Noted
C12. The Applicant must make each Compliance Report publicly available no later than 60 days after submitting it to the Planning Secretary and notify the Planning Secretary in writing at least seven days before this is done.	Noted
Monitoring and Environmental Audits	
C13. Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance reporting and independent auditing. **Note:* For the purposes of this condition, as set out in the EP&A Act, "monitoring" is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Section 5



	Relevant Consent Conditions SSD 9794683	Where Addressed in CEMP
ACC	CESS TO INFORMATION	
	At least 48 hours before the commencement of construction until the completion of all ks under this consent, the Applicant must:	
a)	make the following information and documents (as they are obtained or approved) publicly available on its website:	
	(i) the documents referred to in Condition A2 of this consent;	
	(ii) all current statutory approvals for the Development;	
	(iii) all approved strategies, plans and programs required under the conditions of this consent;	
	(iv) the proposed staging plans for the development if the construction, operation or decommissioning of the development is to be staged;	
	(v) minutes of CCC meetings;	
	(vi) regular reporting on the environmental performance of the Development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent;	Section 5.2
	(vii) a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;	
	(viii) a summary of the current stage and progress of the Development;	
	(ix) contact details to enquire about the development or to make a complaint;	
	(x) a complaints register, updated monthly;	
	(xi) the Compliance Report of the Development;	
	(xii) audit reports prepared as part of any monitoring or environmental audit of the Development and the Applicant's response to the recommendations in any audit report;	
	(xiii) any other matter required by the Planning Secretary; and	
b)	keep such information up to date, to the satisfaction of the Planning Secretary.	



APPENDIX E

Incident Report Form



PROJECT NAME:							
Site Manager / Gen	eral Forema	n:					
Senior Project Manager / Project Manager:							
Name of Person Rep	Name of Person Reporting Incident:						
Name of Person Completing Report:							
1.0 INCIDENT DETAIL	S						
Date / Time of Occurrence	ce:/_	/	Do	ıte / Ti	me Reported:	/	/
Location:			1		- I		
Weather Conditions:							
Type of Incident:	Work Related	- Yes / No			Work Travel Relate	ed - 🗀	Yes / 🗌 No
	Injury Occurre Yes /		Property Do	_		Near	Miss
Non-Injury Incident	(NIIC1)		(NIIC2)]		(NII	С3) 🗆
Class:	Incident that of in Class 1 Person	could have resulted onal Damage	Incident that could have resulted in Class 2 Personal Damage		result	ent that could have led in Class 3 Personal age or caused Property age	
*1 Injury Occurred - If yes,	must complete	PART A (below – injury	y type) & PAR	ТВ (ро	ages 5&6 – details o	f injure	ed person)
PART A Type of	of Injury:	First Aid Injury (FAI)	☐ Medic	al Tre	atment Injury (MTI)		Lost Time Injury (LTI)
2.0 NOTIFICATIONS							
Off Site Notifications: (who)			Whe	en: (date & time)		How: (phone, email etc)
Managing Director (Cons	truction):	☐ Yes / ☐ No	/ 🗌 N/A	_	//		
Construction Director / Constr	ruction Manager:	☐ Yes / ☐ No	/ 🗌 N/A		//		
Senior Project Manager / Proj	ect Manager:	☐ Yes / ☐ No	/ 🗌 N/A	_	//		
HSE and Systems Manage	er:	☐ Yes / ☐ No	/ 🗌 N/A		//		
Senior WHS Advisor:		☐ Yes / ☐ No	/ 🗌 N/A		//		
Rehabilitation Co-ordinat	or:	☐ Yes / ☐ No	/ 🗌 N/A	_	//		
MEND:		☐ Yes / ☐ No	/ 🗌 N/A		//	_	
SafeWork NSW: *2		☐ Yes / ☐ No	/ 🗌 N/A		//	_	
Medical Services:		☐ Yes / ☐ No	/ 🗌 N/A		//		
Fire & Rescue NSW:		☐ Yes / ☐ No	/ 🗌 N/A		//		
NSW Police:		☐ Yes / ☐ No	/ 🗆 N/A	_	//		
Other: (state below)		☐ Yes / ☐ No ☐ Yes / ☐ No		<u> </u>	/ / / /		
*2 SafeWork NSW notified	(If you dotail Sa	folklark NSW Natificati	N- \				



3.0 DESCRIPTION OF TH	3.0 DESCRIPTION OF THE INCIDENT (include details of injuries / damage and assessment of apparent cause)				
Where did the incident happen?					
What was the task?					
What was being done when the incident					
happened?					
What equipment, tools and materials were being used?					
Details of injuries / damage					
What was the apparent cause?					
4.0 WITNESSES					
Were there witnesses to the incident / injury?	Witness 1*3				
☐ Yes / ☐ No	Name:		Employer:		
(If yes, add details)	Occupation:		Contact No:		
	Witness 2*3				
	Name:		Employer:		
	Occupation:		Contact No:		
	Witness 3*3				
	Name:		Employer:		
	Occupation:		Contact No:		

 $^{^{*3}}$ Attach witness statements and associated comments, sketches, photographs and other details as appropriate



5.0 ROOT CAUSE OF INCID	DENT		
Considerations:			
Worker	Equipment	Environment	Management
☐ Fatigue / stress	Poor lighting	☐ Ambient conditions	Hazardous work method specified
Physical disability affecting performance	☐ Excessive noise	☐ Excessive noise	☐ Lack of supervision
Culpable act	Difficulty in operating machine, tool or equipment	☐ Terrain	Provision of incorrect safety equipment or clothing
Skylarking or misconduct	☐ Manual handling	☐ Temperatures	☐ Inadequate training provided
Possible personal problem	☐ Congested work area	Poor housekeeping	Poor housekeeping standard
☐ Inexperience in task being performed	Hazardous machine, tool or equipment	Building surface conditions	Poorly maintain equipment
Failure to use safety clothing	Malfunction or defective machine, tool or equipment	Storage / stacking of materials	Suitable plant / equipment unavailable
Hazardous work method used	Unsuitable safety clothing or equipment	Exposure or contact with chemicals or other harmful materials	Inadequate or no documented procedures
Possible influence of alcohol or drugs	☐ Difficult to maintain	Exposure to infectious sickness / disease	Insufficient or inadequate instruction or information
Act or omission of another person	☐ Inadequate guarding protection	☐ Visibility	☐ Production pressure
6.0 SHORT TERM ACTION T	O BE TAKEN TO PREVENT RE-	OCCURENCE	
Action		Responsibility	Action Close-Out
Action		Responsibility	Closed-Out: Yes
			_
		_	Date of Review:
			//
		_	
		_	



Action		Responsibil	ity	Action	n Close-Out
				Closed-	-Out: Yes
				Date of	Review:
					//
				Reviewe	ed by:
				Closed-	-Out: Yes
					Review:
				Reviewe	
Short term action close	e-out reviewed by:				
Name	Position	Sigr	nature		Date
	HSE and Systems Mana	ger			/
7.0 LONG TERM ACTIO	ON TO BE TAKEN				
Action		Responsibil	ity	Action	n Close-Out
Action		Responsibil	lity		Out: Yes
Action		Responsibil	lity	Closed-	
Action		Responsibil	iity	Closed-	-Out:
Action		Responsibil	ity	Closed-	-Out:
Action		Responsibil	ity	Closed-	-Out:
Action		Responsibil	ity	Closed- Date of Reviews	Cout: Yes Review: //ed by:
Action		Responsibil	lity	Closed- Date of Reviews	-Out:
Action		Responsibil	ity	Closed- Date of Reviews Closed-	Cout: Yes Review: / / ed by: Cout: Yes Review:
Action		Responsibil	ity	Closed- Date of Reviews Closed-	Cout: Yes Review: / / ed by: Cout: Yes Review: / Yes
Action		Responsibil	iity	Closed- Date of Reviews Closed- Date of	Cout: Yes Review: / / ed by: Cout: Yes Review: / Yes
Action		Responsibil	iity	Closed- Date of Reviews Closed- Date of	Cout: Yes Review: / / ed by: Cout: Yes Review: / Yes
	e-out reviewed by:	Responsibil	ity	Closed- Date of Reviews Closed- Date of	Cout: Yes Review: / / ed by: Cout: Yes Review: / Yes
Action Long term action close Name	e-out reviewed by:	Responsibil	Signature	Closed- Date of Reviews Closed- Date of	Cout: Yes Review: / / ed by: Cout: Yes Review: / Yes
ong term action close	-			Closed- Date of Reviews Closed- Date of	Pout: Yes Review: / / ed by:
ong term action close	Position Construction Director / C			Closed- Date of Reviews Closed- Date of	Pout: Yes Review: / / ed by: Pout: Yes Review: / / ed by: Date
ong term action close Name 8.0 EMERGENCY CON	Position Construction Director / C	construction Manager	Signature	Closed- Date of Reviews Closed- Date of Reviews	Pout: Yes Review: / / ed by: Pout: Yes Review: / / ed by: Date

Form 2.3



			-			_		
ACTION: (if relevant)				RESPONSIBILIT	ſΥ:	Close	ed-Out	: Yes
						D . I .	. (D .	•
						Date	e of Rev	new: /
						Revie	/ _ ewed b	·
								.,.
9.0 PROJECT MANA	AGER'S CLOS	E-OUT COMME	NTS					
Name		Position			Signature			Date
		Senior Project M	anager / Proje	ct Manager				//
24222		•						
PART B								
B1 - DETAILS OF IN	JURED PERSO)N (complete a se	parate sheet	for each per	sons)			
Name:								
Date of Birth:	/	/	Age:		years	П М	ale ,	/ Female
Employer Name:				•				
Occupation:			Experie	ence in Cu	rrent Occupo	ation:	_	years
B2 - INJURY DETAIL	LS							
Body Part Injured								
Head		Jaw		Neck			Should	ers
Upper Back		Lower Back		Chest			Abdon	
☐ Hips		Arms		Elbows			Wrists	
☐ Hands		Legs		Knees			Ankles	
☐ Feet		Internal Organs		Eyes			Teeth	
Skin		Other (If other app	olicable, deta		ate):			
Type of Injury								
Abrasion		Bruising		Exposure			Lacero	ution
Burn		Sprain / Strain		Concussio	on		Fractur	re
Crush		Shock		Paralysis			Amput	ation
☐ Fatality		Other (If other app	olicable, deta	il as appropri	ate):			
Mechanism of Injury								
☐ Trip / Slip / Fall		Falling Object		Flying Obj	ect		Knocke	ed
☐ Manual Handling		Chemicals		Knife			Electric	city
☐ Vehicle		Machinery		Equipmer	nt		Tools	
Other (If other an								

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Form 2.3



B3 - PROTECTIVE CLOTHING AND EQUIPMENT (protective clothing and equipment being worn at the time of incident / hazard / near miss)							
☐ Safety Glasses ☐ Sp	lash Goggles		Safety Shoes		Gloves		
☐ Safety Helmet ☐ He	aring Protection	n \square	Fall Protection		Respirator Protection		
Other (If other applicable, detail as a	ppropriate):						
B4 - DAMAGE CLASSIFICATION							
Initial Treatment Ho	spital		Medical		First Aid		
Initial Prognosis	ass 1 Personal D	amage 🗌	Class 2 Personal	al Damage 🔲 Class 3 Personal Damage			
Work Consequences (immediate)	Work Cons	sequences (aft	er 24hours)	Work Consec	quences (after 3 days)		
Return to Pre-Injury Duties	☐ Retur	rn to Pre-Injury Du	ıties	☐ Return t	o Pre-Injury Duties		
Restricted Duties	Restri	Restricted Duties			ed Duties		
☐ Off Work	☐ Off W	Vork		☐ Off Worl	k		
Date Work Ceased:/	_/	Resumed Wor	k:/_	/	Days Absent:		
Duties: ☐ Modified / ☐ Normal	Disease:	☐ Yes / ☐ No	Date Symp Recognise	otoms First ed:	//		
Damage considered to be: ☐ Aggravation of previous personal damage ☐ The source of the personal damage							
THIS INJURY CLASSIFIED AS							
Personal Damage Class 1 (PDC1)	☐ Persor	nal Damage Cl	ass 2 (PDC2)	☐ Personal	Damage Class 3 (PDC3)		

Personal Damage Class Explanation:

Personal Damage Class 1 (PDC1)

Class 1 Personal Damage is that which will permanently alter the future of an individual (e.g. fatality, quadriplegia, paraplegia, amputee, disabled back or psychological disturbance).

Examples include but are not limited to:

- (a) Fatality
- (b) Immediate treatment as an in-patient in a hospital
- (c) Immediate treatment for:
 - Amputation of any part of body, or
 - Serious head injury, or
 - Serious eye injury, or
 - Serious burn, or
 - Separation of skin from underlying tissue, i.e. de-gloving or scalping, or
 - Spinal injury, or
 - Loss of bodily function, or
 - Serious lacerations
- (d) Lost Time Injury (LTI)
- (e) Medical treatment within 48 hours of exposure to a substance
- (f) Psychological damage

Personal Damage Class 2 (PDC2)

Class 2 Personal Damage is that which will temporarily alters a person's future and from which the injured person will almost certainly recover (e.g. a broken arm or muscle strain).

Examples include but are not limited to:

- (a) Fracture of any bone.
- (b) Electric shock requiring immediate medical treatment or loss of consciousness.
- (c) Loss of consciousness resulting from lack of Oxygen.
- (d) Decompression sickness requiring immediate medical treatment.

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- (e) Acute illness requiring medical treatment or loss of consciousness resulting from the absorption of any substance by inhalation, ingestion or through skin.
- (f) Acute illness requiring medical treatment where it resulted from exposure to a pathogen or infected material.
- (g) Any other injury resulting in a person being admitted immediately into hospital for more than 24 hrs.
- (h) Lost Time Injury (LTI)

Personal Damage Class 3 (PDC3)

Class 3 Personal Damage is that which inconveniences a person.

Examples include (but not limited to):

- (a) Minor scratches, cuts, abrasions, burns, splinters
- (b) Dust in eyes etc.

APPENDIX F

Community Communication Strategy

COMMUNITY COMMUNICATION STRATEGY OAKDALE WEST ESTATE - CONCEPT AND STAGE 1

Prepared for:

Goodman Property Services (Australia) Pty Ltd

PREPARED BY

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BASIS OF REPORT

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

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

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

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
660.20005.00000-R01-v8.0	29 September 2022	Kate McKinnon	Alanna Ryan	Alanna Ryan
660.20005.00000-R01-v7.0	22 April 2022	Chelsey Zuiderwyk	Adam Williams	Adam Williams
660.20005.00000-R01-v6.0	11 November 2019	Kate McKinnon	Samantha Hayes	Dan Thompson



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Appendix A Sensitive Receiver Map

Appendix B Key Stakeholder Contact Details

Appendix C Registered Aboriginal Parties

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1 Introduction

1.1 Background

This Community Communication Strategy (CCS) has been prepared on behalf of Goodman Property Services (Australia) Pty Ltd (Goodman) for the Oakdale West Estate (OWE) Concept and Stage 1 development (State Significant Development [SSD] application 7348).

This CCS has been prepared in accordance with Condition C19 and supporting conditions within the Development Consent, identifying relevant stakeholders, key issues and the communication methods. Specifically, it details how Goodman and their contractors will engage with relevant stakeholders and the community. The CCS integrates with the Construction Environmental Management Plan (CEMP) and associated suite of documents to provide a comprehensive guide and benchmark for the construction process that aligns with the Development Consent conditions.

1.2 Purpose

The OWE project has been assessed and determined under Division 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The CCS includes the following key aspects:

- Identification of stakeholders to be consulted with during the CCS implementation including adjacent landowners and residents, key stakeholders, relevant agencies and the wider community.
- The tools and actions to be undertaken throughout the construction program to disseminate information to the identified stakeholders, providing opportunities for comment.
- Enquiry and Complaint management protocols.
- Monitoring and feedback mechanisms.

The CCS will be updated as the project progresses to account for variations in the construction program and methodology, along with changes in stakeholder situation that impacts on stakeholder interests, with these articulated through the feedback mechanisms. This CCS will also be updated to address the operational phase of the development during the preparation of the Operational Environmental Plan (OEMP) for the Estate.

SSD 7348 contained the following conditions of relevance to this CCS used to benchmark the contents:

- C19 & C20 Community Communication Strategy
- D37 Landscaping
- D71 Hours of Work
- D117 Ongoing Community Engagement

- D118 Management Plan Requirements
- D127 & D128 Environmental Representative
- D133 Document Review
- D143 Access to Information

The details of these conditions are identified within **Table 1** below, along with a cross reference to the relevant section of this CCS.



The approved development includes the construction of the Western North-South Link Road (WNSLR). This road is to be constructed to Roads and Maritime Service (RMS) specifications, to the satisfaction of Penrith City Council (as the Nominated Road Authority). Details of these specifications as they relate to community consultation and communication are identified within **Table 2**, including cross reference to the relevant section of this CCS.



Table 1 Relevant Conditions of Consent

Condition Number	Condition Detail	Report Reference
C19 – Community Communication Strategy	No later than one month before the commencement of construction of any stage of the Development, a Community Communication Strategy (CCS) must be prepared and submitted to the Planning Secretary for approval. The CCS is to provide mechanisms to facilitate communication between the Applicant, Council and the community (including adjoining affected landowners, schools, businesses, and others directly impacted by Stage 1), during design, construction and operation. The CCS must:	This CCS Document a) Section 4 b) Section 5 c) Sections 5 & 6 d) Section 2.2 e) Section 5.4
	 a) assign a central contact person to keep the nearby sensitive receivers regularly informed throughout the Development; b) detail the mechanisms for regularly consulting with the local community throughout the Development, such as holding regular meetings to inform the community of the progress of the development and report on environmental monitoring results; c) detail a procedure for consulting with nearby sensitive receivers to schedule high noise generating works, vibration intensive activities or manage traffic disruptions; d) include contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties and other 	
	 interested stakeholders; and e) include a complaints procedure for recording, responding to and managing complaints, including: email, contact telephone number and postal addresses for receiving complaints; advertising the contact details for complaints before and during operation, via the local newspaper and through onsite signage; a complaint register to record the date, time and nature of the complaint, details of the complainant and any actions taken to address the complaint; and procedures for the resolution of any disputes that may arise during the course of the Development. 	
C20 – Community Communication Strategy	The Applicant must: a) not commence construction of the relevant stage of the Concept Proposal until the CCS required under Condition C19 has been approved by the Planning Secretary; and b) implement the CCS for each stage of the Concept Proposal and following the completion of operation of the Development.	a) Section 1.2 b) Sections 5 & 6
D37 – Landscaping	The Applicant must complete the landscape bund along the western boundary of the Site as shown on Figure 5 in Appendix 2 within six months of commencing any construction including bulk earthworks.	Section 2.2.1 Appendix A



Condition Number	Condition Detail	Report Reference
D71 – Hours of Work	Works outside of the hours identified in Condition D70 may be undertaken in the following circumstances: a) works that are inaudible at the nearest sensitive receivers; b) works agreed to in writing by the Planning Secretary; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.	Section 5.3.2
D117 – Ongoing Community Engagement	The Applicant must consult with the community regularly throughout Stage 1, including consultation with the nearby sensitive receivers identified in Appendix 5, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders. Community engagement shall be undertaken in accordance with the Community Communication Strategy approved in accordance with Condition C19.	Sections 5 & 6
D118 – Management Plan Requirements	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include: e) details of: i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures and criteria; and iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, Stage 1 or any management measures; f) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; g) a program to monitor and report on the: i. impacts and environmental performance of Stage 1; and ii. effectiveness of the management measures set out pursuant to paragraph (b) above; h) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; i) a program to investigate and implement ways to improve the environmental performance of Stage 1 over time; j) a protocol for managing and reporting any: i. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); ii. complaint; iii. complaint; iii. failure to comply with statutory requirements; and k) a protocol for periodic review of the plan. Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	a) Refer to Project CEMPs (SLR, 2019a & SLR 2019b) b) Sections 3.2, 5.3 and 5.4 c) Section 6 d) Section 5.4.4 e) Section 6 f) Section 6



Condition Number	Condition Detail	Report Reference
D127 - Environmental	For the duration of construction of Stage 1, or as agreed with the Planning Secretary, the approved ER must:	Section 6.2
Representative	(a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of Stage 1;	
	(b) consider and inform the Planning Secretary on matters specified in the terms of this consent;	
	(c) consider and recommend to the Applicant any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community;	
	(d) review the CEMP identified in Condition D119 and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this consent, and if so:	
	(i) make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or	
	 (ii) make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary/Department for information or are not required to be submitted to the Planning Secretary/Department); 	
	(e) regularly monitor the implementation of the CEMP, and any other documents identified by the Planning Secretary, to ensure implementation is being carried out in accordance with the document and the terms of this consent;	
	(f) as may be requested by the Planning Secretary, help plan, attend or undertake audits of Stage 1 commissioned by the Department including scoping audits, programming audits, briefings, and site visits;	
	(g) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints;	
	(h) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." The Environmental Representative Monthly Report must be submitted within seven calendar days following the end of each month for the duration of the ER's engagement, or as otherwise agreed with the Planning Secretary.	
D128 - Environmental Representative	The Applicant must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition D127 (including preparation of the ER monthly report), as well as:	Section 6.2
	 (a) the complaints register; and (b) a copy of any assessment carried out by the Applicant of whether proposed work is consistent with the consent (which must be provided to the ER before the commencement of the subject work). 	



Condition Number	Condition Detail	Report Reference
D133 Revision of Strategies, Plans and Programs	 Within three months of: (a) the submission of a Compliance Report under Condition D141; (b) the submission of an Environmental Representative Monthly Report under Condition D127; (c) the submission of an incident report under Condition D135; (d) the approval of any modification of the conditions of this consent; or (e) the issue of a direction of the Planning Secretary under Condition D2(b) which requires a review the strategies, plans and programs required under this consent must be reviewed. 	Section 6.2
D143 – Access to Information	At least 48 hours before the commencement of construction until the completion of all works under this consent, the Applicant must: a) make the following information and documents (as they are obtained or approved) publicly available on its website: i. the documents referred to in Condition D2 of this consent; ii. all current statutory approvals for the Development; iii. all approved strategies, plans and programs required under the conditions of this consent; iv. the proposed staging plans for the Development if the construction, operation or decommissioning of the Development is to be staged; v. regular reporting on the environmental performance of the Development in accordance with the reporting requirements in any plans or programs approved under the conditions of this consent; vi. a comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; vii. a summary of the current stage and progress of the Development; viii. contact details to enquire about the Development or to make a complaint; ix. a complaint register, updated monthly; x. the Compliance Report of the Development; xi. audit reports prepared as part of any monitoring or environmental audit of the Development and the Applicant's response to the recommendations in any audit report; xii. any other matter required by the Planning Secretary; and b) keep such information up to date, to the satisfaction of the Planning Secretary.	Section 5.3.1

It is a requirement of the RMS that communications and community liaison are undertaken in accordance with the RMS QA Specification G36 – Environmental Protection. All relevant requirements within the specification are included in **Table 2** below.



Table 2 Relevant RMS Specifications

Specification	Relevant Specification Detail	Report Reference
Number		
3.3 - Resources, Responsibilities and Authority	Communications and Community Liaison Representative Appoint a Communications and Community Liaison Representative (CCLR) to lead and manage the community involvement activities, including liaison with property owners and key stakeholders. This person is your representative for the requirements of RMS G36 Clause 3.7. The CCLR must have relevant qualifications with a minimum of 5 years' communications and community liaison experience, preferably in infrastructure development and delivery. The CCLR must be flexible and willing to work outside of normal working hours when required, such as nights and weekends. The CCLR is to be the primary daily contact to the public handling of enquiries/complaints management/interface issues. The CCLR must be available for contact by local residents and the community at all reasonable times to answer any questions and to address any concerns in relation to your construction activities. The CCLR must have up-to-date information on:	Section 4
	emerging stakeholders;	
	planned construction activities;	
	 planned traffic arrangements, including any temporary traffic switches; 	
	current landowner discussions with members of your staff;	
	 planned community and stakeholder consultations; 	
	complaints or enquiries received;	
	 duties and accountabilities of your staff; and, 	
	commitments to stakeholders made by you or Goodman.	
	The CCLR is to handle document management administration and systems/contact database management and maintenance. The CCLR is to liaise with property owners to co-ordinate access and to deal with specific property related issues arising from the upgrade works. The CCLR is to lead in the development and delivery of communication and community engagement strategies and plans.	
	The CCLR is to facilitate meetings, forums and arranging interviews to address concerns from community.	
	The CCLR is to provide advice and participate with the project teams to improve and enhance the delivery of communication services to the community. The CCLR is to build, maintain collaborative and consultative working relationships with internal and external stakeholders.	
	The CCLR is to possess excellent writing and digital media skills including writing and editing copy for printed and electronic material, internal and external materials such as letters, web brochures and public facing reports, and video and photography for promotional use, etc. The CCLR is to possess a current motor vehicle driver's licence.	
	The CCLR must be available for contact by local residents, key stakeholders and community representatives to answer queries and provide more information or feedback.	



Specification Number	Relevant Specification Detail	Report Reference
3.7 - Communications	Describe in the CEMP the processes for external and internal communication in relation to the environmental aspects of the work under the Contract. Make all staff and subcontractors working on the Site aware of these external and internal communications procedures and ensure they are properly trained in their application.	Refer to Project CEMPs (SLR, 2019a & SLR 2019b) Section 5.3
3.7.1 - Liaison with EPA and/ or other Government Agencies	The CEMP must identify at least two persons (together with their contact telephone numbers) who will be available to be contacted by the EPA and/ or Other Government Agencies on a 24 hour basis and who have authority to take immediate action to shut down any activity, or to effect any pollution control measure, as directed by an authorised officer of the EPA and/ or Other Government Agencies. Immediately notify Goodman of any visit to the Site by the EPA and/ or Other Government Agencies. Prepare a report for each occasion when the Site is visited by the EPA and/ or Other Government Agencies, notifying Goodman of the purpose and outcome of the EPA and/ or Other Government Agencies visit, and of all actions taken by you in response to the EPA and/ or Other Government Agencies visit. Submit this report to Goodman within one working day of the EPA and/ or Other Government Agencies site visit.	Section 4
3.7.2 - Community Liaison and/or Notification 3.7.2.1 New or Changed Construction Activities	Notify local residents and other stakeholders about any new or changed construction activities including changes to bus stop locations and / or timetables which will affect access to their properties/ premises at least five 5 working days before commencing work affecting residents. Such notification must state the nature of the work, why it is necessary, the expected duration, details of any changes to the traffic arrangements or property access and the name and 24 hour contact telephone number of your representative who can respond to any resident/stakeholder concerns. Address any concerns raised by residents in accordance with the complaints procedure as required under Clause 3.7.3 and in accordance with any licence or approval held by you.	
3.7.2.2 - Extended Working Hours – No Environmental Protection Licence	Following approval from Goodman on each instance to extend working hours, inform affected residents by letter of the location, nature, scope and duration of the proposed work outside normal working hours, not less than 1 week and not more than 2 weeks, before commencing such work. Include the name and contact telephone number of your representative so that residents can contact him over any concerns about extended working hours and any other information required by any licence or approval held by you. Refer to Practice Note vii of RMS publication "Environmental Noise Management Manual" when preparing the letter and notifying the affected residents.	Section 5.3.2



Specification Number	Relevant Specification Detail	Report Reference
3.7.3 - Complaints and Enquiries Management	As part of your CEMP, prepare and implement a Construction Complaints and Enquiries Management procedure prior to the commencement of construction. You must follow the Construction Complaints and Enquiries Management procedure for the duration of construction. You must ensure your Construction Complaints and Enquiries Management procedure is consistent with AS 4269 "Complaints Handling". This must include:	Section 5.4
	 a) an advertised 24 hour contact telephone number listed with a telephone company and include a contact name; 	
	 b) a postal address to which written complaints and enquiries can be sent; 	
	 an email address to which electronic complaints and enquiries can be sent; 	
	d) a procedure to receive, record, track and respond to complaints and enquiries within a specified timeframe. When a complaint or enquiry cannot be responded to immediately, a follow-up verbal response on what action is proposed must be provided to the complainant/enquirer within two hours during night-time works and 24 hours at other times;	
	e) a process for the provision of a written response to the complainant/enquirer within ten (10) days, if the complaint or enquiry cannot be resolved by the initial or follow-up verbal response;	
	f) a mediation system for complaints unresolved through the above system.	
	Within one working day of receiving a complaint about any environmental or other issue which has the capacity to damage Goodman's reputation, including any pollution incidents, arising from the Work Under the Contract, submit a written report to Goodman detailing the complaint and the action taken to remedy the problem. A final report together with your proposed measures to prevent the recurrence of such incidents must be submitted to Goodman within 5 working days.	
	Keep a register of all complaints or enquiries, which must include the following details:	
	(a) date and time of complaint or enquiry;	
	(b) method by which the complaint or enquiry was made (telephone, letter, meeting, etc);	
	(c) name, address, contact telephone number of complainant (if no such details were provided, a note to that effect);	
	(d) nature of complaint or enquiry;	
	(e) action taken in response including follow up contact with the complainant.;	
	(f) any monitoring to confirm that the complaint or enquiry has been satisfactorily resolved;	
	(g) if no action was taken, the reasons why no action was taken by you.	



Specification Number	Relevant Specification E	Detail			Report Reference
3.7.4 - Notification	Notify Goodman in advance of the following construction activities:			Sections 5.3.2	
to communities and stakeholders	Activity		Notification required		
	Work at night (any time between 6pm and 7am)			where possible, a n of 1 week	
	Work on weekends (incompublic holidays)	cluding		where possible, a n of 1 week	
	Major changes to confi of road traffic	guration	At least 4	weeks	
	Impacts on pedestrians bicyclists	s and/or	At least 4	l weeks	
	Commencement, resch completion of key cons activities	_	commen	weeks for cement and on, 24 hours' notice for lling	
	Commencement or res	_	At least 2 businesse	weeks (4 weeks for es)	
	Alteration to property arrangements	access	At least 4	weeks	
	Other activities not identified above which may impact on the community stakeholders		At least 24 hours		
	Any form of communit on site	nny form of community protest		tely	
	In your communications the requirements of the Act 1998 (NSW). You must not make any the prior written approve for various notification to	Privacy and undertaking al of Goodm	Personal In s on behalf nan. Compl	nformation Protection f of Goodman without	
	Notification Type	Submissio Goodman		Distribution	
	Out of Hours Works / Night Works (refer to clause 3.7.2.3)	Draft a not letter at le hours prio works beir out	ast 24 r to the	2 weeks where possible, a minimum of 1 week prior to the works being carried out	
	Traffic Conditions	Draft lette 4 weeks pi the traffic conditions	rior to	At least 5 business days prior to the traffic conditions changing if deemed necessary by Goodman	
	Individual private properties regarding property adjustments or	Draft lette 4 weeks pr		At least 2 weeks prior to the works being	

Specification Number	Relevant Specification D	Report Reference		
	changes to access (refer to clause 3.7.2.1)	the works being carried out	carried out of access changes	
	Access for bridgeworks over the Water NSW pipelines	Final draft of notification at least 4 weeks prior to be works being carried out	At least 4 weeks prior to the works being carried out	
	Individual businesses regarding property adjustments or changes to access (refer to clause 3.7.2.1)	Draft letter at least 4 weeks prior to the works being carried out	At least 4 weeks prior to the works being carried out of access changes	

1.3 Community Communications Strategy Scope

The CCS applies to works and operations undertaken by Goodman, their engaged contractors and future tenants of the estate.

Stage 1 comprises two components with separate contractors engaged for each:

- Bulk earthworks across the site, civil infrastructure and landscaping; and construction of warehousing within Precinct 1 (Stage 1).
- Construction of the WNSLR including a signalised intersection with Lenore Drive, roundabout with Lockwood Road and roundabout with the new internal Estate Road No. 1, earthworks, civil works, utility works, property adjustments and landscaping. A haul road will be constructed through Oakdale West (referred to as the Construction Access Road) as part of the WNSLR construction to provide access to the WNSLR corridor.

Stages 2 to 8 will continue to engage contractors for the construction of each building (see Figure 4).

For the construction phase of the project, the CCS applies to all stages of development and separate CEMPs have been prepared to address each component of Stage 1, and separate CEMPs will continue to be prepared for the construction of each building in Stages 2 to 8. All CEMPs reference this CCS and will be serviced by the same project website and phone number to provide a simplified and consistent communications process across the project.

For the operation of these developments, an estate-wide OEMP has been prepared, as well as individual OEMPs for each building. All OEMPs reference this CCS and also include additional information within the OEMP to ensure Condition C19(e) of SSD 7348 is clearly addressed for each tenancy's operation.

1.4 Project Description

1.4.1 State Significant Development Approvals

SSD 7348 was approved on 13 September 2019, granting approval for the Stage 1 Development and Concept Approval for the Oakdale West Industrial Estate at Kemps Creek. The development, as approved under SSD 7348 and approved modifications are included in **Table 3** below.



Table 3 Approved Development and Modifications

Application Number	Development Description
SSD 7348	 A Concept Proposal including: concept layout of 22 warehouse buildings inclusive of dock offices and ancillary offices providing 476,000 square metres of gross lettable area, built over five development stages; concept layout of development lots, internal roads, drainage, landscaping, noise walls, basins and biodiversity offsets; and development controls
	 bulk earthworks across all five stages including retaining walls and noise walls; lead in services including but not limited to drainage, power, sewer, water and telecommunications; service infrastructure to Precinct 1, including drainage, power, sewer, water and telecommunications; construction and operation of three warehouse buildings inclusive of dock offices and ancillary offices in Precinct 1 (1A, 1B and 1C) providing 118,000 square metres of gross lettable area; Western North-South Link Road and associated subdivision, basins and drainage; estate roads 1, 2 and 6 and eastern part of road 7; landscaping of Stage 1, the western boundary, Western North-South Link Road, estate roads 1, 2 and 6 and the eastern part of road 7, detention basins and the amenity lot subdivision of Stage 1 lots and road infrastructure including the services (substation) lot; stormwater drainage infrastructure for Lots 2A and 2B and all basins; temporary works to facilitate construction including but not limited to swales, haul road (construction access), landscaping and basins; and
SSD 7348 MOD 1	 works including construction of traffic signals at Lenore Drive/Grady Crescent/WNSLR intersection. Minor amendments to pad levels, stormwater changes and refinement of the infrastructure design of OWE has resulted in the need for minor amendments to the approved masterplan layout and necessitates minor modifications to SSD 7348.
SSD 7348 MOD 2	Modifications to the Oakdale West Estate approved concept plan and Stage 1 development, including master plan layout, increase in gross floor area and expansion of Building 1A (Warehouse building 1A including high-bay (39m) and low-bay (28m) components), changes to internal roads, civil design and building pad levels.
SSD 7348 MOD 3	 Amendments to the Concept Proposal: the OWE layout and staging precinct boundaries reconfigure estate road layout basic design and infrastructure (including building height, basins, noise wall, pad levels and GLA) civil strategy and servicing strategy development standards applicable to the site including a height increase for Building 2B from 15 m to 28m and applicable noise limits for the development. Amendment to the Stage 1 Development:



Application Number	Development Description	
	 construction of estate road 03, roundabout, retaining wall, noise wall, basins and infrastructure subdivision of estate roads extension to noise wall change to pad levels, bulk earthworks and landscaping and construction hours. 	
SSD 7348 MOD 4	Inclusion of an additional lot (Lot 9 DP 1157476) in the subject site and carrying out works in the additional lot to facilitate development of the WNSLR	
SSD 7348 MOD 5	 Concept Approval Update Condition B10 to reflect the 17m building setback to the Southern Link Road Update Masterplan Landscape Plan reference to reflect the widened road reserve for the Southern Link Road. 	
	 Update Architectural, Civil, and Landscaping plans to reflect the proposed design changes on Lot 1. Change incorrect figure reference in Condition D75A from Figure 7 to Figure 6. Change in correct figure reference in Condition D75C from Figure 7B to Figure 7 and update this condition D75 C to reflect the revised noise barrier completion date. Update Condition D93 to reflect revised location for biodiversity planting 	
SSD 7348 MOD 6	Amendments to the approved Concept Plan and Stage 1 development including changes in Precincts 2A, 2C, 2D, 2E layouts, increase in building height control for Precinct 2A, and inclusion of construction Estate Road 8 as part of Stage 1 development.	
SSD 7348 MOD 7	Changes to Precincts 3 and 4 including earthworks, retaining walls, building layouts in Precinct 4 and estate road 7.	
SSD 7348 MOD 8	Amendments to architectural plans for Stage 1 Buildings 1A, 1B and 1C.	
SSD 7348 MOD 9	Amendments to the layout of Buildings 2A, 2C and 2D and increased height of Building 2C	
SSD 7348 MOD 10	Updates to the Concept plan to update Precinct 5 layout and update to Precinct 1 signage plans, including façade signage	

Further project details are located in the Environmental Impact Statement, Oakdale West Estate, State Significant Development Application (EIS) (Urbis, 2017) and Response to Submissions (RTS) and SSD 7348 Modification Reports, available on the Major Projects Portal.

Table 4 below identifies the site layout, which is a 'Master Plan' to guide the staged development of Oakdale West and core development controls that will form the basis for design and assessment of future development applications for the site. **Figure 2** shows further detail of the WNSLR plans for the estate.

1.4.2 Site works

The site works for the estate will be undertaken by two contractors, with specific areas of responsibility. Areas of responsibility comprise the bulk earth works, civil infrastructure and services, along with the Stage 1 built form development. A second contractor is engaged for the WNSLR connection north to Lenore Drive and haul road civil works through to the south west corner of the site:

The project involves construction activities including:

- Site establishment.
- Clearing and stripping.
- Site construction access.
- Demolition of existing buildings.
- Sediment erosion control works.
- Bulk earthworks and haulage of materials.
- Signage and fencing.
- Construction of civil infrastructure including access roads, bridge, drainage, retaining walls and utilities.
- Building construction and landscaping within Stage 1.

Contractors will continue to be engaged separately for the construction of each building for Stages 2 to 8 (see **Figure 3**).



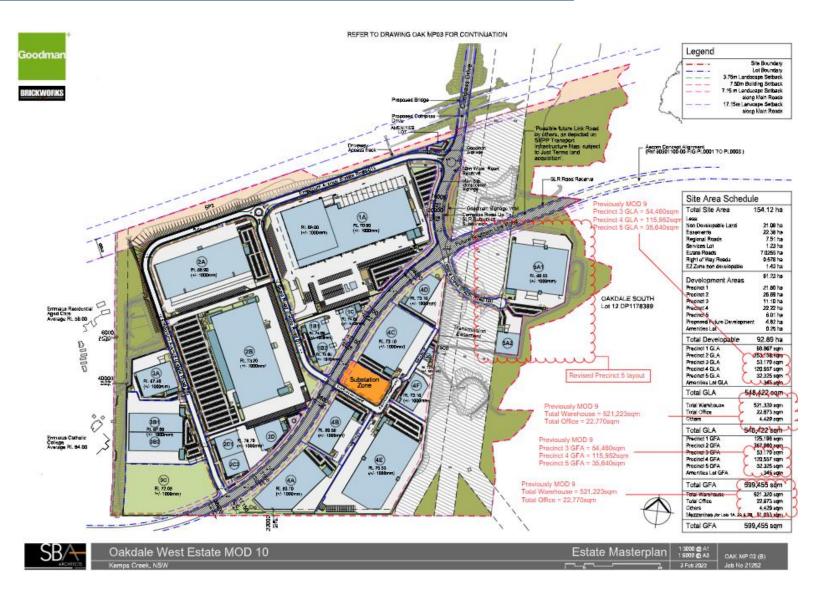


Figure 1 Oakdale West Site Layout



Figure 2 WNSLR Plans



Figure 3 Oakdale West Staging Plan

2 Stakeholder Identification

2.1 Community Overview

The site comprises historic agricultural land identified within the Western Sydney Employment Area (WSEA). The site is located across two Australian Bureau of Statistics (ABS) geographical boundaries, with Erskine Park to the north and Kemps Creek to the south. The ABS data below has been used to inform the communications methodology, with appropriate media and language used to reflect the statistical data.

2.1.1 Erskine Park

Erskine Park has a population of 6,436 accommodated in 2,016 dwellings. The median age is 34 compared to a State median of 38. The top ancestry response is Australian, followed by English, Irish, Scottish then Filipino, with languages other than English spoken at home comprising Arabic (2.6%), Tagalog (2.4%), Filipino (1.4%), then Hindi (1.2%).

17.7% of the Erskine Park population completed Year 12 compared to 15.3% for the State, with 66% of the population employed full time compared to a State average of 59.2%. Management comprised the highest percentage of employment, equating to 19.5%, with a median weekly income of \$781, compared to \$664 for the State.

2.1.2 Kemps Creek

Kemps Creek has a population of 2,268 accommodated in 700 dwellings. The median age is 41 compared to a State median of 38. The top ancestry response is Italian, followed by Australian, English, Lebanese then Maltese, with languages other than English spoken at home comprising Italian (10.1%), Arabic (6.4%), Cantonese (4.3%), then Assyrian Neo-Aramaic (3%).

14.2% of the Kemps Creek population completed Year 12 compared to 15.3% for the State, with 58.4% of the population employed full time compared to a State average of 59.2%. Clerical and Administrative Workers comprised the highest percentage of employment, equating to 20%, with a median weekly income of \$588, compared to \$664 for the State.

2.2 Key Stakeholders

The site is located in close proximity to sensitive receivers to the west comprising a Catholic School, Anglican School and Age Care facility, along with a number of dwellings to the south. The northern and eastern boundaries comprise environmental corridors and infrastructure. Goodman and their representatives carried out extensive consultation with the community and stakeholders during the development of the EIS (Urbis, 2017). Previously identified stakeholders are categorised in **Table 4** below.

Table 4 Key Stakeholders

Stakeholder Agency/Authority	Interests/Issues
Directly affected stakeholders	Adjacent and directly affected properties, businesses and schools including:
·	Residential property – 20 Aldington Road
	Emmaus Catholic College
	Trinity Catholic Primary School
	Emmaus Retirement Village
	Mamre Anglican School
	Catholic Healthcare Emmaus Village
	Little Smarties Early Learning Centre
Local Councils	Penrith City Council
State Government Departments and	NSW EPA
Offices	NSW Heritage Office
	 NSW Biodiversity and Conservation Division, Department of Planning Industry and Environment
	NSW Department of Industry
	Roads and Maritime Service
	Transport for NSW
	NSW Rural Fire Service
	WaterNSW
	National Resources Asset Regulator
Utility and Service Providers	• TransGrid
	Endeavour Energy
	WaterNSW
	Sydney Water
	Jemena
	• NBN
	Telstra
Other Interested Parties	Registered Aboriginal Parties

Contact details for the key stakeholders listed in Table 4 above are included in Appendix B & C.

2.2.1 Properties receiving adjustments or architectural treatment and mitigating works

It is proposed to provide window glazing treatments to assist in acoustic attenuation to dwellings located at 20 Aldington Road, Kemps Creek.

A landscape bund is to be formed along the Western boundary of the development site to create an acoustic barrier to properties to the West. The location of the landscape bund is shown at **Appendix A**. The landscape bund shall be completed within 6 months of the commencement of any construction work, including bulk earthworks.



3 Key Issues Affecting Stakeholders

3.1 Previous Consultation

Goodman and their representatives have previously undertaken consultation with the community and stakeholders during the development of the project. Details of this consultation were included in the EIS (Urbis, 2017).

A total of 15 submissions were received, including one submission from a Local Council, three submissions from utilities providers, nine submissions from government authorities and two submissions from nearby properties and businesses. In response to the issues raised, Goodman revised several plans and consultant reports, which informed a Response to Submissions Report (Urbis, 2018a).

A further 10 submissions following these revisions were received and further modification to proposed plans and consultant reports were made, with a Supplementary Response to Submissions Report (Supplementary RTS) (Urbis, 2018b) prepared to the satisfaction of the determining authority.

For more information, refer to the Department of Planning and Environment's Major Project Assessments webpage at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7348v

3.2 Potential Issues and Strategies

Goodman are committed to ongoing proactive consultation with the community and stakeholders while understanding the importance of addressing potential issues and minimising construction and operational related impacts. **Table 5** outlines project issues that are likely or known to be of interest or concern to the community and stakeholders. The table also details communications related measures and strategies that Goodman will undertake to manage and mitigate impacts. The CEMP identifies management and mitigation measures to address those matters extending beyond consultation.

 Table 5
 Issue Identification and Mitigation

Potential Issue	Potential Key Impacts	Mitigation Strategy
Noise, Vibration and Dust	Truck, machinery and light vehicle movements within, to and from the site, along with civil works have potential to result in negative impacts associated with noise, vibration and dust. Operations within the estate have the potential to emit noise and vibration with the potential to impact on nearby sensitive receivers.	Sensitive receivers and affected stakeholders will be consulted prior to actions likely to generate high levels of noise or vibration in accordance with Section 5.4.2 of this strategy. Up to date information on current and proposed works will be accessible to stakeholders and the wider public on the project web page. Additionally, should any works be likely to generate impacts beyond those identified within the approval's documentation consultation would be undertaken with the applicable managing agency. The CEMP, along with the supporting Dust, Noise and Vibration management plans contain specific measures to manage these impacts. These management plans have been informed by commitments contained within the SSD approvals package, EPA standards and guidelines. The OEMP prepared for the OWE as well as individual OEMPs for each warehouse development will contain environmental management controls to address noise and vibration, as well as monitoring and
Stormwater, Sediment Control, Erosion, Water Quality	High rainfall events could result in localised flooding. Construction could result in impacts to local water quality, associated with sediment laden runoff.	Surrounding sensitive receivers will be consulted with in relation to adjacent works regarding flooding and water quality issues, with these items discussed at regular meetings, or as they arise via the construction hotline, in accordance with Section 5.4.2 of this Strategy. The CEMP, along with the supporting Soil and Water Management Plan and Water Quality Monitoring Program identify specific mechanisms to manage and mitigate these impacts in accordance with the relevant Penrith City Council standards and commitments within the SSD approvals package.
Construction Traffic	A temporary increase in traffic movements may be experienced associated with the import of fill material, the movement of construction machinery to and from the site and the movement of workers light vehicles.	Sensitive receivers will be notified prior to actions likely to cause traffic disruption in accordance with Section 5.4.2 of this strategy. The CEMP and supporting Construction Traffic Management Plan and Fill Importation Plan identify specific mechanisms to manage and mitigate these impacts.



Potential Issue	Potential Key Impacts	Mitigation Strategy
Operational Traffic	An increase in traffic movements may be experienced in the broader locality directly related to the operations of the OWE, including light vehicles and transport trucks.	An OEMP has been established for the overall OWE and individual OEMPs will be developed for each warehouse within the estate. All OEMPs will be informed by and will enforce measures prescribed within Operational Traffic Management Plans (OTMPs), which will be developed to ensure operational traffic volumes and behaviours do not adversely impact on the surrounding area. All vehicle operators related to the OWE will comply with a Driver's Code of Conduct, to ensure safety and respect for other road users and the surrounding community is upheld.
Local Infrastructure, Utilities and Services	Temporary interruption to existing services including surrounding roads may be required to allow for road connections and the extension of services to the site.	Affected receivers would be notified of possible service disruption via letter box drop and regular meetings, with these disruptions minimised where possible through implementation of the designs identified within the SSD approvals package, measures identified within the CEMP and subsequent engagement with utility providers.
Visual Amenity and Privacy	Visual impacts of earthwork and construction activities, along with potential impacts on the privacy of adjacent sensitive receivers.	Potentially affected receivers would be advised of works with the potential for impact via letter box drop and with these items discussed at regular meetings, or as they arise via the construction hotline, in accordance with Section 5.4.2 of this Strategy. The CEMP identifies specific mechanisms to manage and mitigate these impacts.
Removal of Flora and Fauna	The project approval requires the removal of native and exotic flora and fauna to facilitate the development, with the associated potential for impacts on safety of immediately adjacent receivers, along with biodiversity and visual amenity.	Potentially affected receivers are likely to comprise those receivers immediately adjacent, who are to be advised of works with the potential for impact via letter box drop and regular meetings, or as they arise via the construction hotline, in accordance with Section 5.4.2 of this Strategy. The CEMP, along with the supporting Flora and Fauna Management Plan identify specific mechanisms to manage and mitigate these impacts.
Out of Hours Work	The identified impacts could be magnified due to the works being carried out while surrounding receivers are more likely to be home in the early morning/evening, or asleep, with correspondingly lower background noise levels.	Out of hours works to only be undertaken where necessary and subject to endorsement from the applicable managing agency. Should out of hours work with the potential for impact be proposed the potentially affected receivers would be advised via letter box drop and/ or regular meetings in accordance with Section 5.4.2 of this Strategy.



Potential Issue	Potential Key Impacts	Mitigation Strategy
Aboriginal Heritage	There is the potential for encountering items of Aboriginal Heritage during excavation.	Monitoring of works by appropriately qualified personnel, along with the implementation of an unexpected finds protocol in consultation with Aboriginal Stakeholders and Heritage Division of the Department of Planning, Industry and Environment would be put in place, as discussed within Section 5.4.2 of this document. The CEMP, along with the supporting Unexpected Finds Protocol (Heritage) identify specific mechanisms to manage and mitigate these impacts.
Misinformation and Misunderstanding	Lack of project awareness within the wider community may result in complaints being raised by those unaware of the extent of the approval, with these complaints not directed through the appropriate project hotline. Unauthorised release of project information by the project team to the media, stakeholders or the community has potential to impact on project perception in the community.	The CCS includes measures at Section 5.4.2 to provide regular updates in plain language, supported by imagery to stakeholders and the wider community through public and private media. Contact details including the hotline details will be provided on site, the project web page and in all information issued.
Emergency Event	Unforeseen emergency with the potential to impact on the community either directly, or indirectly through out of hours activities that may generate additional traffic or noise.	The CCS includes measures at Section 5.4.2 to provide updates in emergency events, with the CEMP and Emergency Management Plan identifying specific mechanisms to manage and mitigate these impacts.



4 Communications and Community Liaison Representative

Goodman have appointed a Communications and Community Liaison Representative (CCLR) who will provide the community and stakeholders with a single point of contact for the construction phases of the project, responsible for receiving and disseminating information requests and complaints, along with addressing any interface issues. The CCLR will also facilitate property access should it be required.

The CCLR will be available for contact by local residents and the community at all reasonable times to answer any questions and address any concerns relating to the project. The CCLR will have up-to-date information on:

- Emerging stakeholders.
- Planned construction activities.
- Planned traffic arrangements, including any temporary traffic switches.
- Current landowner discussions with members of staff.
- Planned community and stakeholder consultation.
- Complaints or enquiries received.
- Duties and accountabilities of staff.
- Commitments to stakeholders made by Goodman.

The CCLR will be supported by a community consultation team with the following responsibilities:

- Development and delivery of communications strategies, including meeting/workshop facilitation.
- Maintenance of the community and stakeholder consultation register.
- Property owner liaison to address property specific issues.
- Preparation of material and facilitating group and public meetings, workshops and forums for the works.
- Liaison with the construction team to identify items of potential community interest within the upcoming construction program.
- Identifying opportunities for improvement, monitoring community feedback and reporting back to the community via updates to the project web page and at regular community meetings.

The CCLR details are:

- Kiera Plumridge Senior Consultant
 kplumridge@slrconsulting.com; 1300 002 887
- Kate McKinnon Associate SLR kmckinnon@slrconsulting.com; 1300 002 887



5 Community and Stakeholder Engagement

5.1 Objectives

The key objectives of the strategy are to meet the requirements of condition C19 of SSD7348 and:

- Keep the local community and key stakeholders informed of the commencement and progress of works relating to the OWE project.
- Ensure that enquires and complaints received from the community or key stakeholders for the duration of the project are addressed and responded to in a timely and effective manner.
- Inform nearby sensitive receivers in advance of potential disturbances and events likely to cause impact.
- Be good neighbours and members of the local community throughout the duration of the project's lifespan.
- Providing an open two communications channel to allow ongoing, iterative engagement.
- Seek opportunities for improvement throughout the project.

5.2 Approach

Goodman are committed to delivering Community and Stakeholder Engagement outcomes utilising the following principles at the core of their approach:

- **Clarity** Communication and engagement will be delivered in a clear and easy to understand manner to ensure the project and all associated works are fully understood by the community and stakeholders.
- Proactivity Consultation and notice shall be given prior to the commencement of works or the undertaking
 of potentially impactful activities.
- **Transparency** Communication and engagement will be undertaken in an open and transparent fashion, with information shared between the community and the project team.
- Accessibility Information relating to the project will be accessible via a broad range of mediums and will
 be made readily available to the community and stakeholders. Several avenues of contact shall be provided
 for the purposes of enquiry or complaint.

In their communications and consultation with the community and key stakeholders, Goodman and their representatives will comply at all times with the requirements of the *Privacy and Personal Information Protection Act 1998 (NSW)* and the *Privacy Act 1988 (Cth)*.

5.3 Communication, Management and Mitigation Tools

A range of tools and techniques will be used to inform and engage with the community and stakeholders regarding the project. **Table 6** below provides an overview of the mechanisms to be utilised to regularly inform and consult with the local community and key stakeholders and measures to mitigate potential issues throughout the development.



 Table 6
 Communication Management and Mitigation Tools

Tool/ Technique	Description	Person Responsible	Audience	Frequency/Timing/Phase	Specifications
Community Consultation Meetings	Informal meetings, providing a project update and opportunity for the community and stakeholders to discuss recent experiences and upcoming construction activities.	CCLR and Community Consultation Team	The wider community and key stakeholders.	Construction phase. Meetings would initially be held quarterly, with the frequency then subject to the level of interest and the construction program.	Project updated including a review of any complaints received and remedial actions, followed by informal discussion with stakeholders and the community.
Community Workshops/Forums	An initial community workshop/forum to be held to identify the overarching construction program and communications protocols, with the event advertised via local newspaper and letter box drop.	CCLR and Community Consultation Team	The wider community and key stakeholders.	Prior to commencement of construction.	The first portion of the workshop is formal, identifying the project program, key personnel and the communications protocol. The second portion is informal with time for stakeholders and the community to ask questions and discuss any concerns.
Consultation Register	Recording community and stakeholder interactions, along with associated remedial actions as required.	CCLR and Community Consultation Team	The wider community and key stakeholders.	Project duration.	The consultation register satisfies the requirements of Condition C19 of SSD7348, and Specification 3.7.3 of the RMS G36 Specifications requiring a Complaints Register. The register will be continually updated to record community engagement, including information provided by Goodman, feedback received, and remedial action undertaken where required.



Tool/ Technique	Description	Person Responsible	Audience	Frequency/Timing/Phase	Specifications
Environmental Review Group Meeting	Meeting of key environmental stakeholders	Environmental Representative	All environmental stakeholders	As required for the construction phase	The Environmental Review Group will be briefed on upcoming project tasks with key environmental implications, along with complaints and enquiries received
Individual Community Meetings	Meetings with stakeholders as required to discuss a specific item.	CCLR and Community Consultation Team	The wider community and key stakeholders.	As required for the project duration.	Details and format subject to the meetings context, with a record of the discussion included in the consultation register and actioned as required.
Newspaper Advertisement	Newspaper Advertisement(s) to be published in The Western Weekender and Mt Druitt – St Marys Standard identifying the project hotline number and web page address.	CCLR and Community Consultation Team	The wider community and key stakeholders.	Prior to the commencement of the initial construction activities on the site and throughout the project prior to known key intrusive events.	An advertisement will be published advising of the commencement date of construction, a brief overview of the project and key contact details for enquires and complaints including the hotline, webpage and email address. Further advertisements will be published where intrusive events are scheduled advising of the nature and date(s) and time(s) of the event and key contact details for enquiries and complaints.
Notification Letterbox Drop	Letters would be provided to specific receivers identified as being potentially affected by construction. This could be undertaken in tandem with door knocking.	CCLR and Community Consultation Team	Residents of the immediate area.	As required for the project duration.	Letter box drop details to be recorded in the consultation register. Timing of construction activity to be identified along with relevant contact details.
On Site Signage	Project information details.	CCLR and Community Consultation Team	Visitors to the site and residents of the immediate area.	Project duration.	Contain key project contact details including the hotline and web page, along with relevant project and safety information.



Tool/ Technique	Description	Person Responsible	Audience	Frequency/Timing/Phase	Specifications
Online Feedback Forms	Simple form allowing rapid ad hoc feedback.	CCLR and Community Consultation Team	The wider community and key stakeholders.	Project duration.	Form available on the Oakdale project web page, with feedback provided to be incorporated into the consultation register and actioned as required.
Project Information and Complaints Number	Project hotline available for 24 hours recording of project feedback during construction Goodman and Tenant's Representative numbers available during operations	CCLR and Community Consultation Team or Goodman Representative / Tenant Representative	The wider community and key stakeholders.	Project duration.	Hotline number located on site signage, the web page and all project information material. Feedback provided to be incorporated into the consultation register and actioned as required.
Staff and Visitor Induction and Training	Project information details.	Site Forman and Management Staff	Staff and visitors to the site.	Project duration.	Key project safety information, contact details, emergency procedures and site information.
Toolbox and Prestart Meetings for WNSLR and Stage 1 Infrastructure Works	Project information details.	Site Forman and Management Staff	Staff and visitors to the site.	Project duration.	Task specific safety information, emergency procedures and relevant project updates. All staff and subcontractors to be made aware of external and internal communications procedures
Text Message and Email Alerts	Text messages providing prompt updates	CCLR and Community Consultation Team	Residents of the immediate area.	As required for the project duration.	Text Messages and email alerts will provide important information at short notice to potentially affected receivers. Text message and email details to be recorded in the consultation register.



Tool/ Technique	Description	Person Responsible	Audience	Frequency/Timing/Phase	Specifications
Website	A web page is established at: oakdaleopportunities.com	CCLR and Community Consultation Team	The wider community and key stakeholders.	Project duration.	Website address and phone number located on site signage and all project information material. Web page to provide contact details including hotline, email address and enquiry form, as well as project updates, along with environmental performance monitoring. Refer to Section 5.3.1 below for further details.



5.3.1 Project Website

Goodman has established a website for the project (<u>oakdaleopportunities.com</u>). The website was established prior to the commencement of works and will be maintained during the delivery of the project until the completion of all works.

The following information will be updated monthly or more frequently when necessary and made available on the website as required by SSD 7348 Condition D143:

- A copy of the documents listed in Condition D2 of the SSD Consent (SSD 7348).
- All current statutory approvals for the Development.
- All approved strategies, plans and programs required under conditions of the SSD Consent (SSD 7348).
- The proposed staging plans for the Development if the construction, operation or decommissioning of the Development is to be staged.
- A comprehensive summary of the monitoring results of the Development, reported in accordance with the specifications in any conditions of the SSD Consent (SSD 7348), or any approved plans and programs.
- A summary of the current stage and progress of the Development.
- Contact details (including email address, phone number and postal address) to enquire about the Development or to make a complaint.
- A complaints register, updated monthly and details of the complaints handling protocol for the project.
- The Compliance Report of the Development.
- Audit reports prepared as part of any monitoring or environmental audit of the Development and the Applicant's response to the recommendations in any audit report.
- Any other matter required by the Planning Secretary.

5.3.2 WNSLR Works Liaison and Notification Requirements

Where works relate to the construction of the WNSLR, the RMS QA Specification G36 – Environmental Protection sets out a number of specifications and measures addressing notification to the community and affected stakeholders. In order to comply with these requirements, Goodman shall undertake the following activities:

- Goodman shall notify local residents and other stakeholders about any new or changed construction
 activities including changes to bus stop locations and / or timetables, which will affect access to their
 properties/ premises at least five 5 working days before commencing work affecting residents.
- Such notification will state the nature of the work, why it is necessary, the expected duration, details of any
 changes to the traffic arrangements or property access and the name and 24-hour contact telephone
 number of the CCLR who can respond to any resident/stakeholder concerns.
- Any complaints shall be addressed in accordance with the complaint's procedure outlined in Section 5.4 of this strategy.
- Where extended working hours are proposed, the contractor shall inform Goodman who will subsequently inform residents of the proposed work outside normal working hours in accordance with the requirements outlined in this strategy. Written approval from the Planning Secretary will be sought for out of hours work.

Within one working day of receiving a complaint about any environmental or other issue which has the
capacity to damage Goodman's reputation, including any pollution incidents, arising from the Work Under
the Contract, a written report to Goodman shall be submitted detailing the complaint and the action taken
to remedy the problem. A final report together with proposed measures to prevent the recurrence of such
incidents shall be submitted to the Goodman within 5 working days.

The contractor shall adhere to set timeframes for notification of Goodman and distribution of notice to the community and stakeholders for activities related to the WNSLR. This commitment is outlined in **Table 7** and **Table 8** below:

Table 7 Notification Requirements for Goodman prior to Construction Activities

Activity	Notification required
Work at night (any time between 6pm and 7am)	2 weeks where possible, a minimum of 1 week
Work on weekends (including public holidays)	2 weeks where possible, a minimum of 1 week
Major changes to configuration of road traffic	At least 4 weeks
Impacts on pedestrians and/or bicyclists	At least 4 weeks
Commencement, rescheduling or completion of key construction activities	At least 4 weeks for commencement and completion, 24 hours' notice for rescheduling
Commencement or rescheduling of property adjustment work	At least 2 weeks (four weeks for businesses)
Alteration to property access arrangements	At least 4 weeks
Other activities not identified above which may impact on the community stakeholders	At least 24 hours
Any form of community protest on site	Immediately

Table 8 Notification Requirements for construction works

Notification Type	Submission to Goodman	Distribution to Community and Stakeholders
Out of Hours Works / Night Works	Draft a notification letter at least 24 hours prior to the works being carried out	2 weeks where possible, a minimum of 1 week prior to the works being carried out
Traffic Conditions	Draft letter at least 4 weeks prior to the traffic conditions changing	At least 5 business days prior to the traffic conditions changing if deemed necessary by Goodman
Individual private properties regarding property adjustments or changes to access	Draft letter at least 4 weeks prior to the works being carried out	At least 2 weeks prior to the works being carried out of access changes
Access for bridgeworks over the Water NSW pipelines	Final draft of notification at least 4 weeks prior to be works being carried out	At least 4 weeks prior to the works being carried out
Individual businesses regarding property adjustments or changes to access	Draft letter at least 4 weeks prior to the works being carried out	At least 4 weeks prior to the works being carried out of access changes



5.3.3 Communication with Sensitive Receivers' Procedure

During the course of construction works the CCLR will consult with nearby sensitive receivers listed below when necessary to advise of and/or schedule events and activities with the potential to cause impact such as high noise generating works, vibration intensive activities or traffic management disruptions.

The CCLR shall also consult with sensitive receivers to arrange respite period offerings where high-noise works are predicted to exceed 75dBA for residential receivers and 65dBA for schools and the retirement village. Respite offers will also be considered for high vibration works where the works are undertaken within the human comfort minimum working distances for all sensitive receivers.

Sensitive receivers are considered to include adjacent and directly affected properties, businesses and schools including:

- Residential properties located along Aldington Road (As shown in Appendix A).
- Emmaus Catholic Primary School and High School and Retirement Village on Bakers Lane.

Where development works have the potential to impact on sensitive receivers or respite offerings are proposed the CCLR will implement the sensitive receiver procedure outlined in **Table 9** below:

Table 9 Sensitive Receiver Procedure

Potential Impact or Issue	Method of Contact/Consultation	Timeframe
High noise generating work	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours	No less than 24 hours prior to the activity
Vibration intensive activity	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours	No less than 24 hours prior to the activity
Traffic management disruption	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours Variable Message Signs	No less than 24 hours prior to the activity
Respite offerings	Email or phone calls will be undertaken to determine whether respite is required and appropriate scheduling and duration for respite periods	No less than 24 hours prior to the activity

5.4 Complaints Procedure

Goodman are committed to the timely and effective management of enquiries and complaints relating to construction and operational activities for the OWE. To this end, the following complaints procedure shown in **Figure 4** will be adhered to, enabling the receipt and recording of enquiries and complaints, along with the methods of response and resolution of issues raised.



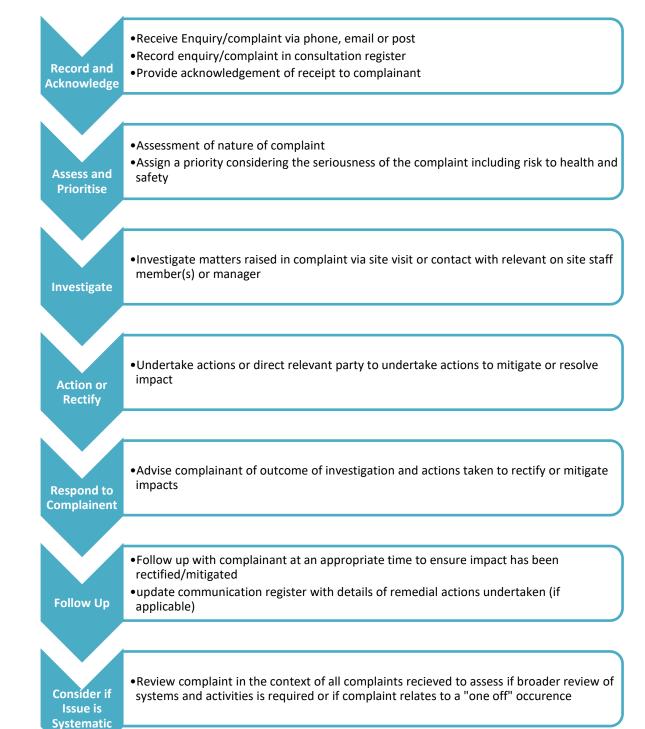


Figure 4 Complaints Handling Procedure



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5.4.1 Protocol for Receiving and Recording Enquiries and Complaints

Goodman have established a project email and postal address for the receipt of enquiries and complaints relating to the development. The email and postal accounts will be regularly monitored to receive and respond to customer feedback and enquiries. The community information line (1300002887) has been established. The CCLR and community consultation team will manage the information line from the commencement of the project until the completion of construction. Where calls are received during hours of construction work (including out of hours works) all calls will be answered by the CCLR. Where calls are received outside of hours of construction works the caller will be invited to leave a message. Phone enquiries and complaints received in relation to the operational phase will be received by Goodman's or the Tenant's Representative. All approaches from the community and stakeholders will be registered in the project's consultation register. The facilities established for receiving enquiries and complaints about the project during construction are shown in **Table 10**.

Table 10 Enquires and Complaints Facilities

Facility	Purpose	Detail
Community Information Line (Construction phase)	A contact phone number and associated contact name for questions/enquiries and the lodgement of complaints relating to the construction of the development.	1300 002 887
Goodman's or Tenant's Representative (Operational phase)	Contact phone numbers and associated contact name for questions/enquiries and the lodgement of complaints relating to the operation of the development.	As per Table 2-2 of the OWE OEMP as well as individual OEMPs for each warehouse
Email Address	An email address accessible via email and online enquiry form for questions/enquiries and the lodgement of complaints relating to the development.	community.oakdalewest@goodman.com
Postal Address	A postal address for the receipt of questions/enquiries and the lodgement of complaints relating to the development.	Level 17, 60 Castlereagh Street, Sydney, NSW 2000
In person verbal	Verbal enquiries and complaints can be made formally during community meetings or may be made informally where staff interact with members of the public in informal settings.	Verbal in person comments and submissions

Goodman have established a consultation register to record all complaints and enquiries received by the above means. The consultation register will be maintained on a regular basis and used to inform discussion at monthly community consultation and project team meetings. The consultation register shall include the following details for all complaints or enquiries received:

- Date and time of complaint or enquiry.
- Method by which the complaint or enquiry was made.
- Name, address, contact telephone number of complainant (if no such details were provided, a note to that effect).
- Nature of complaint or enquiry.
- Action taken in response including follow up contact with the complainant.



- Any monitoring to confirm that the complaint or enquiry has been satisfactorily resolved.
- If no action was taken, the reasons why no action was taken by you.

An excerpt of the consultation register is included at **Appendix B**.

5.4.2 Protocol for Responding to and Resolving Enquiries and Complaints

Where a complaint or enquiry is received the responsible party (CCLR (construction phase) and Goodman or Tenant's Representative (operational phase)) will attempt to provide an immediate response if possible, via phone or email. Where a complaint or enquiry cannot be responded to immediately the responsible party will assess and prioritise the submission and provide the complainant or enquirer with a follow up verbal response on what action is proposed within two hours during construction works (including night and weekend works) and 24 hours at other times. Where a complaint or enquiry cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant or enquirer within ten days.

In the event of a complaint, the responsible party will assess whether the complaint is founded or unfounded and if necessary, delegate the remediation of the issue to the project manager for action or to the relevant project engineer or tenant's representative. The responsible party will oversee the rectification of the issue and respond to the complainant once the issue has been resolved.

In the event of an enquiry, the responsible party will endeavour to provide an immediate response where they are in possession of the relevant information. Where more specific or detailed information is required, the responsible party will liaise with the project manager or relevant project engineer/tenant's representative to obtain the information required to respond to the enquiry and provide this information to the enquiring party once in hand.

Where the above protocol is unsuccessful in resolving complaints, mediation may be undertaken at the discretion of Goodman to facilitate negotiation between affected parties. This shall be performed by an independent person (mediator) appointed by Goodman.

5.4.3 Unreasonable Complainant Conduct

The NSW Ombudsman provides guidelines which define unreasonable complaint conduct as:

"...any behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to a complaint."

Whilst it is not envisioned that the project will attract complainants that exhibit this behaviour, where a complainant is seen to potentially have a negative impact on the CCLR or support team's health, safety, resourcing or equity of service, Goodman shall adhere to the procedures and practices outlined within the NSW Ombudsman's "Managing Unreasonable Complainant Conduct Practice Manual 2nd Edition".

5.4.4 Contingency Management Plan

In accordance with Condition D118(d) of the SSD 7348 consent, a contingency management plan has been developed to outline the management of unpredicted impacts and their consequences. Details of these events, their severity and response are detailed in **Table 11** below:



Table 11 Contingency Management Plan

Key Element	Trigger/ Response	Condition Green	Condition Amber	Condition Red
Submission	Trigger	General feedback/comment (no complaint or query).	Enquiry made by formal or informal channels.	Complaint made by formal or informal channels.
	Response	Acknowledge receipt and record in consultation register. No further response required.	Acknowledge receipt and record in consultation register. Direct enquiry to relevant person for actioning and response within 5 days.	Acknowledge receipt and record in consultation register. Respond to complaint immediately if possible, if not direct enquiry to relevant person for actioning and provide complainant with a follow up verbal response on what action is proposed within two hours during construction works (including night and weekend works) and 24 hours at other times.
Media	Trigger	Positive story in print, online, radio or television.	Neutral or advisory story in print, online, radio or television.	Negative story in print, online, radio or television.
	Response	Record in consultation register and advise Goodman media/marketing team. No further response required.	Record in consultation register and advise Goodman media/marketing team. No further response required.	Record in consultation register and advise Goodman Project Team for further action and response. Contact relevant person for actioning and response within 48 hours



Key Element	Trigger/ Response	Condition Green	Condition Amber	Condition Red
Unscheduled Event	Trigger	Event occurring outside of plan or schedule without impact or potential impact.	Event occurring outside of plan or schedule with minor impact or potential impact.	Event occurring outside of plan or schedule with major impact or potential impact.
	Response	No response required. Identify opportunities for improvement to manage potential future events.	Contact relevant person for actioning and response within 48 hours. Acknowledge in consultation register. Identify opportunities for improvement to manage potential future events.	Contact relevant person for actioning and response immediately. Acknowledge in consultation register. Identify opportunities for improvement to manage potential future events.
Political Interest	Trigger	General or non-specific enquiry by Local, State or Federal political representative.	Enquiry or complaint relating to minor issue by Local, State or Federal political representative.	Enquiry or complaint relating to major issue by Local, State or Federal political representative.
	Response	Goodman Project Team to prepare and provide response or assign response task to relevant staff member for comment. Record in consultation register.	Goodman Project Team to prepare and provide response within 48 hours. Record in consultation register.	Goodman Project Team to prepare and provide response within 24 hours. Record in consultation register.



6 Monitoring, Reporting and Evaluation

Monitoring, Reporting and Evaluation will be undertaken to measure the effectiveness of community consultation, stakeholder engagement and responses to complaints and enquiries. Opportunities for improvement will be sought on a continuous basis, with an annual review of the CCS undertaken to formalise these incremental improvements.

6.1 Monitoring

The performance of this strategy will be monitored monthly based upon an assessment of the following data:

- Total number of monthly complaints.
- Review of number of monthly complaints relating to lack of consultation/misinformation/confusion.
- Review of number of monthly enquiries relating to information previously disseminated to the community through other channels.
- Monthly review of enquiries or complaints of a similar nature or theme indicative of underlying systematic issues with the project or communication strategy.
- Response timeframes, including initial acknowledgement and the response to enquiries or remediation of issue(s).

The parameters of monitoring and performance criteria are outlined in **Table 12** below.

Table 12 Summary of Monitoring Data

Monitoring Parameter	Rationale	Performance Criteria	Monitoring Frequency
Total number of complaints	The number of complaints received in total is indicative of the community's satisfaction with the project.	A reduction in number of complaints, baseline determined by number of complaints received in preceding months.	Monthly
Number of complaints relating to lack of consultation/misinformation/confusion	Number of complaints relating to lack of consultation/misinformation/confusion is indicative of the effectiveness and clarity of communication tools utilized.	A reduction in number of complaints, baseline determined by number of complaints received in preceding month.	Monthly
Number of enquiries relating to information previously disseminated	Number of enquiries relating to information previously disseminated is indicative to the effectiveness of the delivery of information.	A reduction in number of enquiries, baseline determined by number of enquiries received in preceding month.	Monthly
Number of complaints/enquiries within defined categories based on theme or subject	A large number of complaints or enquiries relating to a single issue may be indicative of a systematic issue to be addressed as a priority.	A reduction in number of complaints, baseline determined by number of complaints received in preceding month.	Monthly



Monitoring Parameter	Rationale	Performance Criteria	Monitoring Frequency
Response timeframes	Response to enquiries and complaints should be timely to ensure effective responsiveness and rectification of issues and to encourage trust within the community.	Enquiries and complaints acknowledged within 48 hours. Urgent enquiries and complaints responded to within 48 hours of receipt, non-urgent enquiries and complaints responded to within 5 days.	Monthly

6.2 Reporting

Reporting shall be undertaken annually, with a monthly summary of results provided to the approved Environmental Representative (ER) in accordance with Conditions D127(e) and D128 of SSD77348 and the broader project team during monthly project team meetings. The monthly community consultation summary will be made publicly available on the project web page and shall include:

- A summary of community consultation activities undertaken within the preceding month.
- A summary of community consultation activities proposed within the following month.
- A summary of all enquiries and complaints received within the preceding month, including details of response and/or remediation activities.

Within three months of the submission of documentation identified by Condition D133 this CCS would be reviewed for compatibility.

6.3 Evaluation

Where performance criteria are not being satisfied, review of this strategy and its implementation will be undertaken by the Community Consultation Team and changes to the strategy may be made to rectify the short fall. Where systematic issues are identified associated with construction activities, the project manager will be advised and immediate rectification of the issue will be requested.



7 References

- NSW Ombudsman (2012) Managing Unreasonable Complainant Conduct Practice Manual 2nd Edition
- SLR Consulting Australia (2019) Construction Environmental Management Plan
- Urbis (2017) Environmental Impact Statement Oakdale West Estate (State Significant Development Application Ref 7348)
- Urbis (2018) Response to Submissions (A)
- Urbis (2018) Response to Submissions (B)



APPENDIX A

Sensitive Receiver Map





APPENDIX B

Key Stakeholder Contact Details



Contact Name/Organisation	Contact Details
The Residents – 20 Aldington Road	
Emmaus Catholic College	Harvey Anchique - Business Manager P: (02) 9670 8300 F: (02) 9834 3403 M: 0428 063 119 E: hanchique@parra.catholic.edu.au
Trinity Catholic Primary School	Catherine Hey - Principal, chey@parra.catholic.edu.au, 02 8856 6200
Mamre Anglican School	Cathie Graydon – Principal (02)98341881, cathie.graydon@mamre.nsw.edu.au Marijana Motrivic, Business Manager 02, 8073 6908 marijana.mitrovic@mamre.nsw.edu.au,
Catholic Healthcare Emmaus Village	James Byrne Building Services Manager, M. 0434604370, jbyrne@chcs.com.au Kate Todd, Emmaus Village, ktodd@chcs.com.au, Home, 02 8804 0200
Little Smarties Learning Centre	61 2 9834 2155 kempscreek@littlesmarties.com.au
Penrith City Council	61 2 4732 7777 council@penrith.city
NSW EPA	131 555 info@epa.nsw.gov.au
NSW Biodiversity and Conservation Division, Department of Planning Industry and Environment	61 2 9995 5000 info@environment.nsw.gov.au
NSW Department of Industry	61 2 9338 6600
Roads and Maritime Service	13 22 13
Transport for NSW	61 2 8202 2200
NSW Rural Fire Service	61 2 8741 5555 webmaster@rfs.nsw.gov.au
WaterNSW	1300 662 077 Customer.Helpdesk@waternsw.com.au
National Resources Asset Regulator	61 2 9338 6600
TransGrid	61 2 9284 3000
Endeavour Energy	131 081
Sydney water	13 20 92
Jemena	1300 536 362
NBN	1300 687 626
Telstra	13 22 00
Registered Aboriginal Parties	See Appendix C



APPENDIX C

Registered Aboriginal Parties



Name	Organisation	Address	Suburb	State	Postcode Email	Phone Mobile: 0411 650 057	Notes
Caroline Hickey Andrew Williams Amanda Hickey Karia Lea Bond Seli Storer Richard Andy Simalene Cariage	A1 Indigenous Services Aboriginal Archaeology Service Inc. Amanda Hickey Cultural Services Badu Biamanga Bidawal CHTS Bilinga	PO Box 6283 41 Dempsey St 11 Jeffery Pi	Rouse Hill Emu Heights Morya	NSW NSW NSW	cazadirect@live.com 2155 AAS.info@bigpond.com 2750 amandahickev@live.com.au 2537 baduchts@gmail.com bidawalchts@gmail.com bidawalchts@gmail.com bilingachts@gmail.com	Mobile: 0490 126 040 Mobile: 0434 480 588 Mobile: 0476 381 207	OR Wandai Kirkbright???
Jennifer Beale	Butucarbin Aboriginal Corporation	28 - 30 Pringle Road	Hebersham	NSW	2770 koori@ozemail.com.au	Office: (02) 9832 7167, Mobile: 0409 924 409	Website: http://www.butucarbin.org.au/, postal address: PO Box E18 Emerton NSW 2770
Marylin Carroll-Johnson Corey Smith	Corroborree Aboriginal Corporation Cullendulla	PO Box 3340	Rouse Hill	NSW	2155 corroboreecorp@bigpond.com.au cullendullachts@gmail.com	Mobile: 0415 911 159	Contact details for Steve Johnson
Gordon Morton Des Dyer	Darug Aboriginal Cultural Heritage Assessments Darug Aboriginal Landcare	Unit 9, 6 Chapman Ave 18A Perigee Close	Chatswood Doonside	NSW NSW	2067 2767 desmond4552@hotmail.com	Office: (02) 9410 3665, Mobile: 0422 865 831 Mobile: 0408 360 814	Site officer: 0402 942 572
Justine Coplin	Darug Custodian Aboriginal Corporation	n PO Box 81	WINDSOR	NSW	2756 justinecoplin@optusnet.com.au	(02) 4577 5181 Office: (02) 4577 5181,	
Leanne Watson Jamie Workman Gordon Workman	Darug Custodian Aboriginal Corporation Darug Land Observations PTY LTD Darug Land Observations PTY LTD	PO Box 571 PO Box 571	Windsor Plumpton Plumpton	NSW NSW NSW	2758 mulgokiwi@bigpond.com 2761 daruglandobservations@gmail.com 2761 gordow51@bigpond.net.au	Mobile: 0415 770 163 Mobile: 0420 591 138 Mobile: 0415 663 763	Deceased
John Reilly	Darug Tribal Aboriginal Corporation Deerubbin Local Aboriginal Land	PO Box 441	Blacktown	NSW	2148 Jmreilly228@gmail.com	Office: (02) 9622 4081	
Steve Randall Andrew Bond	Council Dharug CHTS Dhinawan-Dhigaraa Culture and	2/9 Tindale St	Penrith	NSW	2750 <u>SRandall@deerubbin.org.au</u> <u>dharugchts@gmail.com</u>	Office: (02) 4724 5600	
Ricky Fields	Heritage PTY LTD Dhinawan-Dhigaraa Culture and	19 Moomi St	Lalor Park	NSW	2147 Dhinawan2@yahoo.com.au	Mobile: 0402 942 572	
Athol Smith Lilly Carroll Paul Boyd Keith Nye Lenard Nye Kahu Brennan Kim Carriage	Heritage PTY LTD Didge Ngunawal Didge Ngunawal Djiringanj CHTS Elouera CHTS Eora Gangangarra	16 Yantara Place	Woodcroft	NSW	2767 phinawan2@vahoo.com.au didgengunawalcian@yahoo.com.au diiringanichts@gmail.com elouerachts@gmail.com eorachts@gmail.com gangangarra@gmail.com	Mobile: 0499 665 715 Mobile: 0450 616 404 Mobile: 0426 823 944	
Basil Smith Wendy Smith	Goobah Developments Gulaga	66 Grantham Rd	Batehaven	NSW	2536 goobahchts@gmail.com gulagachts@gmail.com	Mobile: 0405 995 725	
Christopher Payne	Gundungurra Tribal Technical Services	9/15/22 Burns Rd	Leumeah	NSW	2560 chrispayne776@qmail.com	Mobile: 0466 975 437	
David Bell	Gundungurra Tribal Technical Services	67 Dickens Rd	Ambarvale	NSW	2560 gundungurratectribsevices@gmail.com	Mobile: 0450 124 891	
Larry Hoskins	Gundungurra Tribal Technical Services	2/3 Colville PI	Rosemeadow	NSW	2560 gundungurratectribsevices@gmail.com	Mobile: 0478 009 879	
Pimmy Johnson Bell	Gundungurra Tribal Technical Services	67 Dickens Rd	Ambarvale	NSW	2560 gundungurratectribsevices@gmail.com	Mobile: 0425 066 100	
Sam Wickman	Gundungurra Tribal Technical Services				gundungurratectribsevices@gmail.com		
Teangi Mereki Foster	Gundungurra Tribal Technical Services Gunjeewong Cultural Heritage	1/6 Central Ave	Oak Flats	NSW	2529 gundungurratectribsevices@gmail.com	Mobile: 0420 978 969	
Cherie Carroll Turrise	Aboriginal Corporation	1 Bellvue Place	Portland	NSW	2847 julieschroder5@live.com.au	Office: (02) 6355 4110	
Lisa Green Darlene Hoskins-McKenzie Patricia Hampton	Gunninderra Aboriginal Corporation Gunyuu CHTS HSB Consultants	PO Box 3340 62 Ropes Crossing Bouleva	Rouse Hill rd Ropes Crossing	NSW	2155 ginninderra.corp@gmail.com gunyuuchts@gmail.com 2760 hsb_heritageconsultants@mail.com	Mobile: 0404 297 224 Mobile: 0424 142 216	Contact: Krystle Carroll



Joanne Anne Stewart	Jerringong				jerringong@gmail.com	Mobile: 0422 800 184	
Phil Kahn Vicki Slater	Kamilaroi-Yankuntjatjara Working Group Kawul Cultural Services	78 Forbes St 89 Pyramid St	Emu Plains Emu Plains	NSW NSW	2750 philipkhan.acn@live.com.au 2750 vicki.slater@hotmail.com	Mobile: 0434 545 982	
Shaun Carroll Aaron Broad Kaya Dawn Bell	Kuringgai CHTS Merrigarn Indigenous Corporation Minnamunnung Munyunga	GPO Box 158 1 Waratah Ave	Canberra City Albion Park	ACT NSW	kuringgaichts@gmail.com 2601 merrigarn@yahoo.com.au 2527 nundagurri@gmail.com munyungachts@gmail.com	Mobile: 0435 040 842 Mobile: 0402 526 888	
Roxanne Smith Darleen Johnson	Murramarang Murri Bidgee Mullangari Aboriginal Corporation Murrin CHTS	PO Box 246	Seven Hills	NSW	murramarangchts@gmail.com 2147 murrabidgeemullangari@yahoo.com.au murrinchts@gmail.com	Mobile: 0490 051 102	
levi McKenzie-Kirkbright Newton Bond Edward Stewart Newton Carriage	Murrumbul Ngarigo CHTS Ngunawal Nundagurri				murrumbul@gmail.com ngarigochts@gmail.com ngunawalchts@gmail.com		Or Levi McKenzie-Kirkbright?????
Pemulwuy Johnson Tony Williams	Pemulwuy CHTS Rane Consulting Thaiaira CHTS	14 Top Place 1 Pyrenees Way	Mount Annan Beaumont Hills	NSW NSW	nundagurri@gmail.com 2567 pemulwuyd@gmail.com 2155 ajw1901@biqpond.com thauairachts@gmail.com	Mobile: 0425 066 100 Office: (02) 8824 6991	
John Carriage	Tharawal CHTS				tharawalchts@gmail.com		Changed Violet to John as he was elected chairman in May 2018
Danny Franks Hika Te Kowhai	Tocomwall Walbunja Walgalu CHTS	PO Box 76	Caringbah	NSW	1495 danny@tocomwall.com.au walbunja@gmail.com walgaluchts@gmail.com	Mobile: 0415 226 725 Mobile: 0402 730 612	
William Bond Aaron Slater Steven Hickey	Wandandian Warrigal Cultural Services Widescope Indigenous Group	73 Russell St	Emu Plains	NSW	wandandianchts@gmail.com Warrigal_c.s@hotmail.com 2750 widescope.group@live.com	Mobile: 0421 355 890 Mobile: 0425 230 693	Changed William to Aaron
Hayley Bell Lee-Roy James Boota Kerrie Slater	Wingikara Wullung Wurrumay Consultant	54 Blackwood St	Gerringong	NSW	wingikarachts@gmail.com 2534 wullunglb@gmail.com wurrumay@hotmail.com	Mobile: 0403 703 942	
Robert ParsonS	Yerramurra				yerramurra@gmail.com		



APPENDIX D

Complaints Register



Date	Time	Responsible Party	In/Out	Initial Communication Method/Tool	Contact Name/ Organisation	Contact Details	Documentation Location (if applicable)	Communication Type: Complaint/ Enquiry/ Communication	Summary of Issues/ Details	Action Taken	Further Action/ Monitoring to Confirm Resolution



ASIA PACIFIC OFFICES

BRISBANE

Level 2, 15 Astor Terrace Spring Hill QLD 4000 Australia

T: +61 7 3858 4800 F: +61 7 3858 4801

MACKAY

21 River Street Mackay QLD 4740 Australia

T: +61 7 3181 3300

SYDNEY

2 Lincoln Street Lane Cove NSW 2066 Australia

T: +61 2 9427 8100 F: +61 2 9427 8200

AUCKLAND

68 Beach Road Auckland 1010 New Zealand T: +64 27 441 7849

CANBERRA

GPO 410 Canberra ACT 2600 Australia

T: +61 2 6287 0800 F: +61 2 9427 8200

MELBOURNE

Suite 2, 2 Domville Avenue Hawthorn VIC 3122 Australia

T: +61 3 9249 9400 F: +61 3 9249 9499

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APPENDIX G

Construction Noise and Vibration Management Plan

OAKDALE WEST INDUSTRIAL ESTATE - LOT 2C-2D

Construction Noise and Vibration Management Plan

Prepared for:

Goodman Property Services (Aust) Pty Ltd
The Hayesbery
1-11 Hayes Road
Rosebery NSW 2018



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BASIS OF REPORT

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

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

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

DOCUMENT CONTROL

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APPENDICES

Appendix A Acoustic Terminology Appendix B Author CV



1 Introduction

SLR Consulting Australia Pty Ltd (SLR) has been engaged by Goodman Property Services (Aust) Pty Limited (Goodman) to prepare a Construction Noise and Vibration Management Plan (CNVMP) for construction works associated with the development of Lot 2C-2D of the Oakdale West Industrial Estate (Oakdale West) in Kemps Creek.

The CNVMP addresses the potential noise and vibration impacts associated with the construction of the development and details the mitigation and management procedures for dealing with potential impacts. Construction noise and vibration impacts were previously assessed for Oakdale West Lot 2C-2D as part of the *Oakdale West Estate – Buildings 2A, 2C & 2D Noise and Vibration Assessment* (Report No 2102730 Version B) prepared by RWDI in October 2021 (the NVA).

1.1 Development Overview

Oakdale West is a regional warehouse and distribution hub located at Kemps Creek within the Penrith local government area (LGA) and forms part of the broader Oakdale Industrial Precinct located within the Western Sydney Employment Area (WSEA) (see **Figure 1**).

Goodman obtained Development Consent SSD 7348 for the staged development of Oakdale West Industrial Estate (Oakdale West) comprising a warehousing and a distribution hub at Kemps Creek in Western Sydney. SSD 7348 incorporates the approval of a 'Concept Proposal' to guide the future development of the estate and consent for the 'Stage 1 Development' and all subsequent stages. The Stage 1 Development includes construction of the proposed Western North South Link Road (WNSLR), site-wide bulk earthworks, estate wide basins, and lead-in services. It also includes infrastructure and associated services, landscaping, and construction and use approval for Precinct 1.

This CNVMP has been prepared to cover the construction at Lot 2C-2D of Oakdale West (see **Figure 2**). Note: Where Goodman is nominated as having responsibility as the Applicant, this may be delegated to their specialist consultants.

The development of Lot 2C-2D was approved in December 2021 under SSD 9794683.



Figure 1 Oakdale West Masterplan REFER TO DRAWING OAK MP03 FOR CONTINUATION Legend Aecom Concept Alignment (Ref 60301100-00-FIG-PL0001 TO PL0003) 21.80 ha 26.69 ha 11.10 ha 22.22 ha 6.01 ha 4.82 ha 0.25 ha OAKDALE SOUTH Lot 12 DP1178389 Total Developable
Precinct 1 GLA
Precinct 2 GLA
Precinct 3 GLA
Precinct 4 GLA
Precinct 5 GLA
Amenities Lot GLA 92.89 ha 88,867 sqm 253,158 sqm 53,170 sqm 120,557 sqm 32,325 sqm 345 sqm Total GLA (with Total GLA (with Total GLA (with Precinct 1 GFA Precinct 2 GFA Precinct 3 GFA Precinct 4 GFA Precinct 5 GFA Amenities Lot GF Total GFA Total GFA 599,455 sqm Oakdale West Estate - MOD 10 Estate Masterplan

SLR^ॐ

Warehouse 2C-2 Warehouse 2D

Office 2C-1 (2 levels) Office 2C-2 (2 levels) Office 2D (1 level)

Total Bullding Area

Hardstand Area Light Duty Area

Precinct 4

Awning Site Cover (exc. awning) Floor Space Ratio

4,735 sqm 5,860 sqm

350 sqm 330 sqm 375 sqm

16,800 sam

2,305 sqm 45 % 0.45 : 1

8,015 sqm 5,590 sqm

FOR TENDER

LOCAS

LOCAS

According to the following follo

Figure 2 Lot 2C-2D Plan

1.2 Objectives of the CNVMP

allfi

Temporary Road Turning Head

The objectives of this CNVMP are as follows:

- Document the statutory requirements applicable to construction noise and vibration emissions;
- Detail the mitigation and management measures required to achieve compliance with relevant noise and vibration criteria for surrounding sensitive receivers;
- Outline the roles and responsibilities in relation to the management of noise and vibration emissions during construction; and
- Promote environmental awareness among employees and subcontractors.

This CNVMP covers construction of Lot 2C-2D at Oakdale West.

1.3 Terminology

Specific acoustic terminology is used in this report. An explanation of common acoustic terms is provided in **Appendix A**.



2 Statutory Requirements

This CNVMP has been prepared to accompany the Construction Environmental Management Plan (CEMP) for Lot 2C-2D at Oakdale West. The conditions relevant to this CNVMP are outlined in the following sections.

2.1 Development Consent

Conditions for Lot 2C-2D of Oakdale West are specified Development Consent SSD 9794683, dated December 2021. The conditions relevant to this CNVMP are reproduced in **Table 1**.

Table 1 Development Consent Conditions

Development Consent C	Section / Comment		
Operation of Plant and			
A20. All plant and equipment used on site, or to monitor the performance of the development must be: a) maintained in a proper and efficient condition; and b) operated in a proper and efficient manner.			Section 6 / Table 11
Hours of Work			
B7. The Applicant must of agreed in writing by the Table 2 : Hours of Works	- · · · · · · · · · · · · · · · · · · ·	able 2, unless otherwise	Section 3.5
Activity	Day	Time	
Construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm	
Operation	Monday – Sunday	24 hours	
 B8. Works outside the hours identified in Condition B7 may be undertaken in the following circumstances: a) works that are inaudible at the nearest sensitive receivers; b) works agreed to in writing by the Planning Secretary; c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm. 			Section 3.5
Construction Noise Limi	ts		
B11. The development n management levels deta may be updated or repla mitigation measures mu construction noise mana with the management a	Section 4.1, Section 5.1 and Section 6 / Table 11		
Management Plan Requ			
C1. Management plans r relevant guidelines, and	required under this consent must be include:	e prepared in accordance with	Noted



De	velopment Consent Conditions	Section / Comment
a)	details of: i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii) any relevant limits or performance measures and criteria; and iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;	 i) Section 2 ii) Section 4 iii) Section 4, Section 6 / Table 11 and Section 8
b)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 5 and Section 6 / Table 11
c)	 a program to monitor and report on the: i) impacts and environmental performance of the development; and ii) effectiveness of the management measures set out pursuant to paragraph (b) above; 	Section 8
d)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 6 and Section 9
e)	a program to investigate and implement ways to improve the environmental performance of the development over time;	Section 11 , and Section 6 of the CEMP
f)	 a protocol for managing and reporting any: incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); complaint; failure to comply with statutory requirements; and 	i) Section 9 ii) Section 7 iii) Section 9
g)	a protocol for periodic review of the plan.	Section 11 , and Section 6 of the CEMP



2.2 Relevant Guidelines

The guidelines used to assess the construction impacts from the development are listed in **Table 2**. The guidelines aim to protect the community and environment from excessive noise and vibration impacts that may result from construction of the development.

Table 2 Construction Noise and Vibration Guidelines

Guideline/Policy Name	Where Used
Environment Protection Authority (EPA) (2009) Interim Construction Noise Guideline (ICNG)	Assessment of noise impacts on sensitive receivers.
Roads and Maritime Services (2016) Construction Noise and Vibration Guideline (CNVG)	Assessment and management protocols for noise and vibration impacts.
Environment Protection Authority (EPA) (2006) Assessing Vibration: a technical guideline	Assessment of vibration impacts on sensitive receivers.
British Standard Institution (BSI) (1993) <i>BS 7385 Part 2-1993 Evaluation and measurement for vibration in buildings Part 2</i> (BS 7385)	Assessment of vibration impacts (structural damage) to sensitive structures.
German Institute for Standardisation (Deutsches Institut für Normung) (1999) <i>DIN 4150 – Structural vibration -</i> <i>Effects of vibration on structures</i> (DIN 4150)	Assessment of vibration impacts (structural damage) to sensitive structures.



3 Project Overview

3.1 Description

The Oakdale West site is bound to the north by the WaterNSW Pipeline and to the east by the Ropes Creek riparian corridor. Land along the eastern boundary of the site is also affected by a transmission easement associated with Transgrid infrastructure. To the east of the site is Goodman's Oakdale South Estate. Emmaus Catholic College and Emmaus Retirement Village are located to the west of the site. Other boundaries interface with adjoining rural lands used for a mix of rural-residential and agricultural.

Lot 2C-2D is located in Precinct 2 of Oakdale West (see Figure 1).

3.2 Location

Located in the Penrith local government area (LGA) at the far south western extent of the WSEA, Oakdale West is made up of the land parcel legally described as Lot 102 DP 1262308, owned by Goodman.

3.3 Surrounding Land Uses

The noise and vibration assessment locations representative of the nearest sensitive receivers surrounding Oakdale West were identified in the NVA for the project and are shown in **Figure 3**.



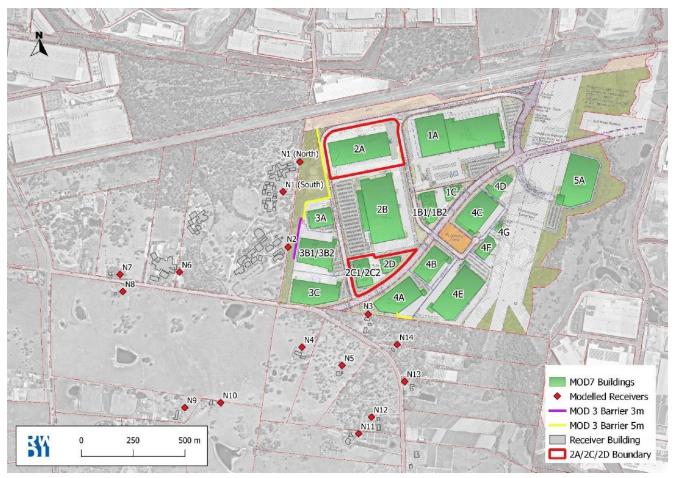


Figure 3 Receiver Locations

Note 1: Figure sourced from Oakdale West Estate – Buildings 2A, 2C & 2D Noise and Vibration Assessment (Report No 2102730 Version B) prepared by RWDI in October 2021 (the NVA).

3.4 Construction Timing and Activities

Construction at Lot 2C-2D is proposed to commence in 2022 and be completed in 2023.

Construction activities will include:

- Minor earthworks to accommodate the building and external levels;
- Pouring of concrete slabs;
- Construction of the warehouse and office including wall and roof cladding;
- Internal fit-outs (office area and warehouse racking);
- Construction of loading bays
- Construction of truck and car parking areas; and
- Site landscaping.



3.5 Construction Hours

Construction hours will be in accordance with Conditions B7 and B8 of Development Consent SSD 9794683, which are reproduced below:

B7. The Applicant must comply with the hours detailed in Table 2, unless otherwise agreed in writing by the Planning Secretary.

Table 2: Hours of Work

Activity	Day	Time
Construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm

B8. Works outside of the hours identified in Condition B7 may be undertaken in the following circumstances:

- a) works that are inaudible at the nearest sensitive receivers;
- b) works agreed to in writing by the Planning Secretary;
- c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
- d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.

Condition B8(a) of Development Consent SSD 9794683 notes that works may be undertaken outside of standard construction hours where the works are inaudible at the nearest sensitive receivers. Out of hours works can be undertaken without requiring approval from the Planning Secretary where it can be demonstrated that works will not be audible at any sensitive receivers.

The potential for audible impacts can be assessed by calculating predicted noise levels with a construction noise model, or by undertaking test measurements during a period with similar background noise levels to the proposed works period (noting that audibility is subjective and dependent on the background noise level at the time of the works). The predictions/measurements must be confirmed at the commencement of works with attended noise monitoring at the nearest sensitive receivers. These predictions and measurements will be undertaken by a suitably qualified acoustic consultant.

In accordance with Condition B8(b) of Development Consent SSD 9794683, where works are required out of hours and noise is predicted to be audible at the nearest receivers, then written approval from the Planning Secretary must be received prior to commencement of works, except where the works fall under Conditions B8(c) or B8(d).

The construction hours will be provided to all staff and contractors in the induction. The movements of staff and contractors will be recorded for this project.

3.6 Construction Site Access

Access to Lot 2C-2D will be via Compass Drive (the WNSLR) and Estate Roads 01 and 03 (refer to Figure 1).



4 Construction Noise and Vibration Criteria and Guidelines

4.1 Construction Noise Criteria

Oakdale West must be constructed with the aim of achieving the construction noise management levels (NMLs) detailed in the NSW *Interim Construction Noise Guideline* (ICNG). Explanation of what constitutes feasible and reasonable is outlined in Section 1.4 of the ICNG.

The ICNG process to determine NMLs is detailed in **Section 4.1.1**. The project specific noise criteria is summarised in **Section 4.1.2**.

4.1.1 Interim Construction Noise Guideline

The ICNG requires project specific NMLs to be established for noise affected receivers. The NMLs are not mandatory limits, however in the event construction noise levels are predicted to be above the NMLs, feasible and reasonable work practices are to be investigated to minimise noise emissions.

The ICNG provides an approach for determining NMLs at residential receivers based on Rating Background Level (RBL) for the area, as described in **Table 3**.

Table 3 Determination of NMLs for Residential Receivers

Time of Day	NML LAeq(15minute)	How to Apply
ICNG Standard construction hours Monday to Friday 7:00 am to 6:00 pm Saturday 8:00 am to 1:00 pm No work on Sundays or public holidays	Noise affected RBL + 10 dBA	 The noise affected level represents the point above which there may be some community reaction to noise. Where the predicted or measured LAeq(15minute) is greater than the noise affected level, the proponent should apply all feasible and reasonable work practices to meet the noise affected level. The proponent should also inform all potentially impacted residents of the nature of works to be carried out, the expected noise levels and duration, as well as contact details.
	Highly Noise Affected 75 dBA	 The Highly Noise Affected (HNA) level represents the point above which there may be strong community reaction to noise. Where noise is above this level, the relevant authority (consent, determining or regulatory) may require respite periods by restructuring the hours that the very noisy activities can occur, taking into account: Times identified by the community when they are less sensitive to noise (such as before and after school for works near schools or mid-morning or mid-afternoon for works near residences. If the community is prepared to accept a longer period of construction in exchange for restrictions on construction times.



Time of Day	NML LAeq(15minute)	How to Apply
Outside recommended standard construction hours	Noise affected RBL + 5 dBA	 A strong justification would typically be required for works outside the recommended standard hours. The proponent should apply all feasible and reasonable work practices to meet the noise affected level. Where all feasible and reasonable practises have been applied and noise is more than 5 dBA above the noise affected level, the proponent should negotiate with the community.

Note 1 The RBL is the overall single-figure background noise level measured in each relevant assessment period (during or outside the recommended standard hours). The term RBL is described in detail in the NSW *Noise Policy for Industry*.

Works are recommended to be completed during Standard Construction Hours where possible. More stringent requirements are placed on works that are required to be completed outside of Standard Construction Hours (ie during the evening or night-time) which reflects the greater sensitivity of communities to noise impacts during these periods.

The ICNG also recognises other kinds of noise sensitive receivers and provides recommended NMLs for them. Those specific receivers and their recommended noise levels are presented in **Table 4**.

Table 4 Construction Noise Management Levels at Other Sensitive Land Uses

Land use	NML LAeq(15minute)
Classrooms at schools and other educational institutions	Internal noise level 45 dBA
Hospital wards and operating theatres	Internal noise level 45 dBA
Places of worship	Internal noise level 45 dBA
Active recreation areas (characterised by sporting activities and activities which generate their own noise or focus for participants, making them less sensitive to external noise intrusion)	External noise level 65 dBA
Passive recreation areas (characterised by contemplative activities that generate little noise and where benefits are compromised by external noise intrusion, for example, reading, meditation)	External noise level 60 dBA
Community centres	Depends on the intended use of the centre

The ICNG notes that due to the broad range of sensitivities that commercial or industrial land can have to noise from construction, the process of defining management levels is separated into three categories:

- Industrial premises: external 75 dBA LAeq(15minute)
- Offices, retail outlets: external 70 dBA LAeq(15minute)
- For other businesses that may be very sensitive to noise, appropriate goals should be determined on a case by case basis with reference to Australian/New Zealand Standard AS/NZS 2107:2016 Acoustics Recommended design sound levels and reverberation times for building interiors (AS2107).



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4.1.2 Project Specific NML Summary

The NVA defined the airborne NMLs for the various surrounding receivers for standard construction hours. The NMLs applicable for the receivers surrounding Oakdale West are outlined in **Table 5**.

Table 5 Project Specific Noise Management Levels

Receiver	Period	LAeq(15minute) Construction NMLs (dBA)		
		Standard Hours	Highly Noise Affected	
N1, N7 & N8	Day	49	75	
N9 – N14	Day	44	75	
N2 & N6	Day	55 ¹	n/a	

Note 1: Noise level of Laeq 55 dBA has been adopted, with consideration to the generally accepted 10 dB noise reduction typically achieved through a partially open window.

It is understood that a Noise Agreement between the applicant and receiver N3, N4 and N5 has been made. As such, no criteria are applicable at receivers N3, N4 and N5.

As noted in **Table 3**, where the predicted or measured LAeq(15minute) construction noise levels exceed the NMLs in **Table 5**, all feasible and reasonable work practises will be applied with the aim of meeting the NMLs.

Where the predicted or measured construction noise levels are above the highly noise affected criteria (i.e. 75 dBA), respite periods may be required by restructuring the hours that the noisy activities can occur.

Predicted construction noise levels are discussed in Section 5.1.

4.2 Construction Vibration Criteria

Vibration from construction works on the site, as measured at any residence or sensitive structure, must be limited to the criteria outlined in:

- For structural damage German Standard DIN 4150-3 (1992-02) Structural vibration Effects of vibration on structures (DIN 4150); and
- For human exposure, the EPA's Assessing Vibration: a technical guideline.

British Standard *BS 7385 Part 2-1993 Evaluation and measurement for vibration in buildings Part 2* (BS 7385) provides further guidance with regards to reducing the potential for structural damage.

Structural damage criteria are detailed in **Section 4.2.1** and human exposure criteria is detailed in **Section 4.2.2**.

Minimum working distances based on these criteria are summarised in Section 4.2.3.



4.2.1 Cosmetic Damage Vibration Thresholds

British Standard BS 7385

The recommended vibration limits from BS 7385 for transient vibration for minimal risk of cosmetic damage to residential and industrial buildings are shown in **Table 6**. These levels are judged to give a minimum risk of vibration-induced damage, where minimal risk is usually taken as a 95% probability of no effect.

Table 6 Transient Vibration Guide Values for Minimal Risk of Cosmetic Damage (BS 7385)

Line	Type of Building	Peak Component Particle Velocity in Frequency Range of Predominant Pulse		
		4 Hz to 15 Hz	15 Hz and above	
1	Reinforced or framed structures Industrial and heavy commercial buildings	50 mm/s at 4 Hz and above	50 mm/s at 4 Hz and above	
2	Unreinforced or light framed structures	15 mm/s at 4 Hz increasing to 20 mm/s at 15 Hz	20 mm/s at 15 Hz increasing to 50 mm/s at 40 Hz and above	

German Standard DIN 4150-3

For continuous long-term vibration or repetitive vibration with the potential to cause fatigue effects, DIN 4150 provides the following Peak Particle Velocity (PPV) values as safe limits, below which even superficial cosmetic damage is not to be expected:

- 10 mm/s for commercial buildings and buildings of similar design.
- 5 mm/s for dwellings and buildings or similar design.
- 2.5 mm/s for buildings of great intrinsic value (eg heritage listed buildings).

For short-term vibration events (ie those unlikely to cause resonance or fatigue), DIN 4150 offers the criteria shown in **Table 7**. These are maximum levels measured in any direction at the foundation or in the horizontal axes in the plane of the uppermost floor.



Table 7 Guideline Values for Short-term Vibration on Structures (DIN 4150)

Group	Type of Structure	Guideline Values Vibration Velocity (mm/s)				
		Foundation, All Directions at a Frequency of		Topmost Floor, Horizontal	Floor Slabs, Vertical	
		1 to 10 Hz	10 to 50 Hz	50 to 100 Hz	All frequencies	All frequencies
1	Buildings used for commercial purposes, industrial buildings and buildings of similar design	20	20 to 40	40 to 50	40	20
2	Residential buildings and buildings of similar design and/or occupancy	5	5 to 15	15 to 20	15	20
3	Structures that, because of their particular sensitivity to vibration, cannot be classified as Group 1 or 2 <u>and</u> are of great intrinsic value (e.g. listed buildings)	3	3 to 8	8 to 10	8	201

Note 1: It may be necessary to lower the relevant guideline value markedly to prevent minor damage.

The "safe limits" given in DIN 4150 are the levels up to which no damage due to vibration effects has been observed for the particular class of building. "Damage" is defined by DIN 4150 to include even minor non-structural effects such as superficial cracking in cement render, the enlargement of cracks already present, and the separation of partitions or intermediate walls from load bearing walls.

4.2.2 Human Exposure Vibration Thresholds

The EPA's Assessing Vibration: a technical guideline provides guideline values for continuous, transient and intermittent events that are based on a Vibration Dose Value (VDV) rather than a continuous vibration level. The VDV is dependent upon the level and duration of the short-term vibration event, as well as the number of events occurring during the daytime or night-time period.

The VDVs recommended in the document for vibration of an intermittent nature (i.e. construction works where more than three distinct vibration events occur) are presented in **Table 8**.



Table 8 Acceptable Vibration Dose Values for Intermittent Vibration (m/s^{1.75}) (Assessing Vibration: a technical guideline)

Location	Daytime ¹		Night-time ¹	
	Preferred Value	Maximum Value	Preferred Value	Maximum Value
Residences	0.20	0.40	0.13	0.26
Offices, schools, educational institutions and places of worship	0.40	0.80	0.40	0.80
Workshops	0.80	1.60	0.80	1.60

Note 1: Daytime is 7:00 am to 10:00 pm and night-time is 10:00 pm to 7:00 am.

4.2.3 Minimum Working Distances

Recommended minimum working distances for vibration intensive construction plant based on the BS 7385, DIN 4150 and *Assessing Vibration: a technical guideline* are referenced from the Roads and Maritime *Construction Noise and Vibration Guideline* (CNVG). Theses minimum working distances are summarised in **Table 9**.

The minimum working distances are based on empirical data which suggests that where works are further from receivers than the quoted minimum distances then impacts are not considered likely.

The minimum working distances are indicative and will vary depending on the particular item of equipment and local geotechnical conditions. The distances apply to cosmetic damage of typical building under typical geotechnical conditions.



Table 9 Recommended Minimum Working Distances for Vibration Intensive Equipment

Plant Item	Rating / Description	Minimum Distance		
		Cosmetic Damage		Human Response
		Residential and Light Commercial (BS 7385) ¹	Heritage Items (DIN 4150 Group 3) ²	(NSW EPA Guideline) ¹
Vibratory Roller	< 50 kN (Typically 1-2t)	5 m	11 m	15 m to 20 m
	< 100 kN (Typically 2-4t)	6 m	13 m	20 m
	< 200 kN (Typically 4-6t)	12 m	15 m	40 m
	< 300 kN (Typically 7-13t)	15 m	31 m	100 m
	> 300 kN (Typically 13-18t)	20 m	40 m	100 m
	> 300 kN (Typically > 18t)	25 m	50 m	100 m
Small Hydraulic Hammer	300 kg – 5 to 12t excavator	2 m	5 m	7 m
Medium Hydraulic Hammer	900 kg – 12 to 18t excavator	7 m	15 m	23 m
Large Hydraulic Hammer	1600 kg – 18 to 34t excavator	22 m	44 m	73 m
Vibratory Pile Driver	Sheet piles	2 m to 20 m	5 m to 40 m	20 m
Pile Boring	≤ 800 mm	2 m (nominal)	5 m	4 m
Jackhammer	Hand held	1 m (nominal)	3 m	2 m

Note 1: Criteria reference from Roads and Maritime CNVG.

Note 2: Criteria reference from DIN 4150.



5 Construction Noise and Vibration Impacts

5.1 Construction Noise Impacts

The NVA presented construction noise predictions from a number of construction scenarios likely to occur on site. These construction scenarios are representative of the activities which will be required during the construction of the site. These included:

- Earthworks
- Pad and hardstand works
- Construction of warehouse and office structures

The predicted worst-case noise levels from the various construction works at Oakdale West Lot 2C-2D are presented in **Table 10**.

Table 10 Predicted LAeq, 15min Construction Noise Levels

Receiver	Period	LAeq,15min	Noise Level (dBA)			
(weathe	(weather)	CNML	Highly	Predicted		
			Affected NML	Earthworks	Hardstand	Construction
N1 – Emmaus Village Residential	Day (Standard)	49	75	50	48	43
N2 – Emmaus Catholic College (School)	Day (Standard)	55	n/a	55	52	46
N6 – Mamre Anglican College	Day (Standard)	55	n/a	41	39	34
N7 – 21-42 Bakers Ln, Kemps Creek	Day (Standard)	49	75	39	37	32
N8 – 706-752 Mamre Rd, Kemps Creek	Day (Standard)	49	75	25	22	18
N9 – 754-770 Mamre Rd, Kemps Creek	Day (Standard)	44	75	37	34	30
N10 – 784-786 Mamre Rd, Kemps Creek	Day (Standard)	44	75	39	36	32
N11 – 99-111 Aldington Rd, Kemps Creek	Day (Standard)	44	75	36	34	29
N12 – 53 Aldington Rd, Kemps Creek	Day (Standard)	44	75	35	32	28
N13 – 54-72 Aldington Rd, Kemps Creek	Day (Standard)	44	75	41	39	34
N14 – 74-88 Aldington Rd, Kemps Creek	Day (Standard)	44	75	39	37	32

Note 1: **Bold** text indicates and exceedance of the ICNG CNML.



As detailed in the NVA and shown in **Table 10** above, the construction noise impacts are predicted to be within the daytime NMLs with the exception of noise impacts from earthworks at N1. The exceedance of the NMLs is minor (up to 1 dBA) and would generally be limited to when works are closest to the nearest receivers. Noise impacts would generally reduce in magnitude as construction works move away from the nearest receivers.

No exceedance of the standard construction hours NMLs are predicted at school, commercial or other residential receiver areas.

Best practise noise management measures will be undertaken for all construction works. Additional feasible and reasonable noise mitigation and management measures will be applied for works where an exceedance of the NMLs is identified, with the aim of achieving the applicable NMLs.

Mitigation and management measures are outlined in Section 6.

5.2 Construction Vibration Impacts

Vibration intensive items of plant proposed for use during the construction of the development would include plate compactors and vibratory rollers. These items of equipment are proposed to be used during various stages of works across the project.

The nearest receiver building (N3) are over 100 m from the boundary of construction works of Lot 2C-2D. As such, vibration intensive equipment is not anticipated to have the potential to be operated within the recommended minimum working distances of the nearest receivers.

Vibration at the nearest receivers is unlikely to be perceptible during the works.



6 Mitigation and Management Measures

In order to minimise noise impacts during works, the construction contractor will take all reasonable and feasible measures to mitigate noise effects. Impacts from the works will be minimised and managed in accordance with the procedures detailed below in **Table 11**.

Note: Table 11 is replicated in the CEMP.

 Table 11
 Environmental Management Controls for Construction Noise and Vibration

Measure	Person Responsible	Timing / Frequency	Reference / Notes
Project Planning			
Less noise and vibration intensive construction techniques for rock breaking and concrete sawing will be used.	Construction Contractor	Ongoing	Best practice
Works will be completed during the approved construction hours outlined in Section 3.5 .			
Truck routes to site will be in accordance with the approved Construction Traffic Management Plan.			
Scheduling			
Respite offers will be considered where high-noise works are predicted to exceed 75 dBA for residential receivers. Respite offers will be considered for high-vibration works where the works are undertaken within the human comfort minimum working distances for all receiver types. Consultation with these receivers will be undertaken to determine appropriate respite periods, such as exam periods for schools.	Communications and Community Liaison Representative (refer to Table 4 of the CEMP)	Ongoing	Best practice
Duration Respite will be considered where it may be beneficial to the sensitive receivers to increase the duration of blocks of work or number of consecutive periods in order to complete the works more quickly. The project team will engage with the community where Duration Respite is considered in accordance with the CCS.			
Notification detailing work activities, dates and hours, impacts and mitigation measures, indication of work schedule over the night time period, any operational noise benefits from the works (where applicable) and contact telephone numbers will be undertaken in accordance with the CCS.			



Measure	Person Responsible	Timing / Frequency	Reference / Notes
Site Layout			
Compounds and worksites will be designed to promote one-way traffic and minimise the need for vehicle reversing.	Construction Contractor	Ongoing	Best practice
Where practicable, work compounds, parking areas, and equipment and material stockpiles will be positioned away from noise-sensitive locations and take advantage of existing screening from local topography.			
Equipment that is noisy will be started away from sensitive receivers			
Training			
Training will be provided to all personnel on noise and vibration requirements for the project. Inductions and toolbox talks to be used to inform personnel of the location and sensitivity of surrounding receivers.	Construction Contractor	Ongoing	Best practice
Plant and Equipment Source Mitigation			
 All construction plant and equipment used on Site must be, in addition to other requirements: a) regularly inspected and maintained in an efficient condition; b) operated in a proper and efficient manner. Where practicable, tonal reversing alarms (beepers) will be replaced with non-tonal alarms (squawkers) on all equipment in use (subject to occupational health and safety requirements). 	Construction Contractor	Ongoing	SSD 9794683 Condition A20 Best practice
Noisy equipment will be sited behind structures that act as barriers, or at the greatest distance from the noise-sensitive area; or orienting the equipment so that noise emissions are directed away from any sensitive areas, to achieve the maximum attenuation of noise.			
Noise generating equipment will be regularly checked and effectively maintained, including checking of hatches/enclosures regularly to ensure that seals are in good condition and doors close properly against seals.			
Dropping materials from a height will be avoided.			
Loading and unloading will be carried out away from noise sensitive areas, where practicable.			
Trucks will not queue outside residential properties. Truck drivers will avoid compression braking as far as practicable.			
Truck movements will be kept to a minimum, ie trucks are fully loaded on each trip.			



Measure	Person Responsible	Timing / Frequency	Reference / Notes
Community Consultation			
Notifications will be provided to the affected community where high impacts are anticipated or where works outside approved construction hours are required. Notification will be a minimum of 24 hours. Refer to the CCS.	Communications and Community Liaison Representative	Ongoing	Best practice
Where complaints are received, work practices will be reviewed and feasible and reasonable practices implemented to minimise any further impacts. Refer to Section 7.			
Monitoring			
Noise and/or vibration monitoring will be conducted (as appropriate) when noise/vibration intensive works are being undertaken in close proximity to sensitive receivers.	Construction Contractor	Ongoing	Best practice
Noise and/or vibration monitoring will be conducted (as appropriate) in response to any complaints received to verify that levels are not substantially above the predicted levels.			
Refer to Section 8 for full details of monitoring requirements.			
Vibration			
Where works are required within the minimum working distances, vibration monitoring will be undertaken to confirm that vibration is within acceptable levels.	Construction Contractor	Ongoing	Best practice
Where there is a risk that vibration activities may cause damage to nearby structures and buildings or if these are located within the minimum working distance from the construction activity, a building condition inspection will be undertaken at least three weeks before the construction activity commences.		Before and after any vibration activities within minimum distances	
The Building Condition Inspection Reports will contain photographs of the inspected properties and include details of the inspectors' qualification and expertise, together with a list of any identified defects, where relevant. The reports will be submitted to the owner of each property and to Goodman before the commencement of any vibration intensive activities.			
A copy of the Building Condition Inspection Reports and CNVMP will be submitted to Goodman at least 10 working days prior to commencement of piling, excavation by hammering or ripping, compaction, demolition operations, or any activity which may cause damage through vibration.			



Initial consultation has been established with all potentially affected community groups and sensitive receivers (refer to the CCS). The mitigation and management measures detailed in **Table 11** are considered to be appropriate to minimise impacts on the potentially affected receivers.

These measures will be implemented and refined as informed by the results of monitoring and ongoing community consultation.

Specific consultation with the potentially affected receivers to determine suitable respite periods and management measures will be undertaken during the planning stage of high-noise generating works once specific details of the works have been identified, such as the location of the works, activities proposed to be undertaken and required equipment.



7 Complaints Handling and Response Procedure

All complaints will be handled in accordance with the sections below and the *Community Communication Strategy* (CCS) (SLR 2020a) (see Appendix F of the CEMP).

7.1 Performance Objective

To ensure that all environmental complaints in relation to the construction of Lot 2C-2D at Oakdale West are promptly and effectively received, handled and addressed.

7.2 Responsibility

The Communications and Community Liaison Representative is responsible for ensuring that the appropriate management response and handling procedures are instigated and carried through in the event of an environmental complaint. The induction and toolbox talks outlined in Section 3.4 of the CEMP will be used to ensure all site employees are aware of and understand their obligations for complaints response.

All employees who take receipt of a complaint, either verbal or written, are to immediately notify the Contractor's Project Manager, who will then contact the Communications and Community Liaison Representative.

7.3 Complaints Handling Procedure

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

1. Record and Acknowledge

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

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

The complainant's name, address and contact details, along with the nature of the complaint, will be requested. If the complainant refuses to supply the requested information, a note will be made on the form and complainant advised of this.

2. Assess and Prioritise

The Communications and Community Liaison Representative will prioritise all complaints by considering the seriousness of the complaint including risk to health and safety and will attempt to provide an immediate response via phone or email. This will be undertaken in accordance with the CCS (SLR 2020a).



3. Investigate

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

If the complaint is due to an incident, the notification requirements and handling procedures outlined in Section 3.5.3 and 3.5.4 of the CEMP respectively will be followed.

4. Action or Rectify

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

5. Respond to Complainant

The Communications and Community Liaison Representative will oversee the rectification of the issue and respond to the complainant once the issue has been resolved. The complainant will be provided with a follow up verbal response on what action is proposed within two hours during night-time works (between the hours of 6:00 pm and 10:00 pm) and 24 hours at other times. Where a complaint cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant within ten days.

6. Record

It is imperative that an assessment of the situation is carried out and documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded in Community Correspondence Register (Appendix G of the CEMP). A copy of the completed form will be maintained for at least five years. The complaint will also be recorded in the Complaints Register, as per Section 3.6.4 of the CEMP.

7. Preventative Action

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

7.4 Complaints Register

A Complaints Register will be maintained during construction and will contain the following:

- A copy of the environmental complaint handling procedure contained in Section 3.6.3 of the CEMP;
- A separate reference sheet containing the contact details listed in Table 4 of the CEMP;
- Blank hard copies of the Community Correspondence Register (see Appendix G of the CEMP); and
- Copies of all completed Community Correspondence Register entries which are to be maintained for at least five years after the event to which they relate.



8 Monitoring

8.1 Construction Noise Monitoring

Attended noise measurements will be undertaken at the start of noise intensive works in the vicinity of sensitive receivers to verify the levels are as predicted and to check the effectiveness of mitigation and management measures used to minimise the impacts.

Attended monitoring will also be undertaken in response to any complaints regarding construction noise. The location and extent of monitoring would be determined in consultation with Goodman and an acoustic consultant and would be dependent on the activities taking place.

The monitoring will take place during the expected noisiest construction periods and be representative / indicative of any impact across all potentially affected sensitive receivers.

Monitoring reports will be produced following each monitoring survey and provided to Goodman for review. In the event that an exceedance of the applicable NMLs is measured (refer to **Section 4.1**), actions to be carried out are detailed in **Section 9**.

All items of acoustic instrumentation utilised will be designed to comply with applicable guidelines and carry current calibration certificates.

8.2 Construction Vibration Monitoring

8.2.1 Sensitive Receivers and Structures

Where vibration intensive works (such as vibratory rolling and plate compacting) are proposed to be undertaken within the minimum working distances of sensitive receivers or structures (refer to **Section 4.2.3**), vibration will be monitored continuously for the duration of works within the minimum working distances.

Attended vibration measurements will be undertaken at the commencement of vibration intensive works within the minimum working distances to confirm the levels of vibration are below the applicable vibration limits (refer to **Section 4.2**).

Geophones will be installed by an acoustic consultant at the closest points of the sensitive structure to the vibration intensive works to continuously monitor vibration for the duration of the works. Should the works location change, the geophones will be relocated to remain at the closest point of the structure to the works.

The vibration monitoring equipment will have visible and audible alarms installed where operators of equipment can see/hear them:

- A warning vibration level of 2/3 of the applicable vibration limit will set off the visual alarm if exceeded – the equipment operator must take care to limit vibration emissions when the warning level is exceeded.
- An exceedance vibration level equal to the applicable vibration limit will set off both the visual and audible alarms. Actions to be carried out if the exceedance alarm is set off are detailed in **Section 9**.



Monitoring data will be downloaded and reported monthly, at a minimum. Vibration monitoring reports will be prepared and provided to Goodman for review at the following stages:

- Monthly during works (at a minimum)
- Within one week of an exceedance of the vibration limit alarm level (15 mm/s PPV)
- Upon completion of construction.

All items of vibration instrumentation utilised will be designed to comply with applicable guidelines and carry current calibration certificates.



9 Contingency Management Plan

The following contingency management plan, shown in **Table 12**, would be used to manage any unpredicted noise and vibration impacts and their consequences.

In the event of an incident, response will be carried out in accordance with the procedures detailed in Section 3.5 of the overarching CEMP. As detailed in Section 5.4 of the overarching CEMP, all Condition Amber and Condition Red occurrences will be recorded in the Environmental Representative Monthly Report and discussed during the toolbox talks.

The following events constitute an incident in terms of noise and vibration:

- Trigger of Condition Red for noise impacts during the approved construction hours detailed in Section 3.5.
- Any works occurring outside the approved construction hours, where those works do not meet the allowable circumstances defined in **Section 3.5**.
- Trigger of Condition Red for vibration impacts at sensitive receiver locations.

Table 12 Contingency Management Plan

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



10 Roles and Responsibilities

Overall roles and responsibilities relating to the project are outlined in Section 3.2 of the overarching CEMP.

The key responsibilities specifically for noise and vibration management are as follows:

10.1 Contractor's Project Manager

- Ensuring appropriate resources are available for the implementation of this CNVMP;
- Assessing data from inspections and providing project-wide advice to ensure consistent approach and outcomes are achieved;
- Providing necessary training for project personnel to cover noise and vibration management;
- Reviewing and update of this CNVMP;
- Commissioning a suitably qualified consultant to install and maintain noise and vibration monitors and ensuring that the environmental coordinator undertakes any attended noise and vibration measurements required by this Plan;
- Assessing and (as required) mitigating risks of elevated noise and vibration levels before commencing works each day and ensuring that the appropriate controls are implemented and effective;
- Reviewing weather forecasts and current observations of meteorological conditions (as recorded at Horsley Park AWS);
- Ceasing works in the event of excessive noise and vibration generation due to noise enhancing weather conditions or inadequately controlled construction activities (e.g. strong winds blowing from the noise source to nearby receivers, temperature inversions, etc.); and
- In the event that a noise or vibration complaint is received, the procedure in Section 3.6 of the CEMP will be implemented (see **Section 7**).

10.2 Environmental Coordinator

- Undertaking noise monitoring program;
- Review that control measures are working in accordance with the CNVMP; and
- Identifying and reporting noise and vibration emissions incidents.

10.3 All Workers on Site

- Observing any noise and vibration emission control instructions and procedures that apply to their work;
- Taking action to prevent or minimise noise and vibration emission incidents; and
- Identifying and reporting noise and vibration emission incidents.



11 Review and Improvement of the CNVMP

Details on review and improvement are outlined in Section 6 of the overarching CEMP.



APPENDIX A

Acoustic Terminology



1. Sound Level or Noise Level

The terms 'sound' and 'noise' are almost interchangeable, except that 'noise' often refers to unwanted sound.

Sound (or noise) consists of minute fluctuations in atmospheric pressure. The human ear responds to changes in sound pressure over a very wide range with the loudest sound pressure to which the human ear can respond being ten million times greater than the softest. The decibel (abbreviated as dB) scale reduces this ratio to a more manageable size by the use of logarithms.

The symbols SPL, L or LP are commonly used to represent Sound Pressure Level. The symbol LA represents A-weighted Sound Pressure Level. The standard reference unit for Sound Pressure Levels expressed in decibels is 2 x 10⁻⁵ Pa.

2. 'A' Weighted Sound Pressure Level

The overall level of a sound is usually expressed in terms of dBA, which is measured using a sound level meter with an 'A-weighting' filter. This is an electronic filter having a frequency response corresponding approximately to that of human hearing.

People's hearing is most sensitive to sounds at mid frequencies (500 Hz to 4,000 Hz), and less sensitive at lower and higher frequencies. Different sources having the same dBA level generally sound about equally loud.

A change of 1 dB or 2 dB in the level of a sound is difficult for most people to detect, whilst a 3 dB to 5 dB change corresponds to a small but noticeable change in loudness. A 10 dB change corresponds to an approximate doubling or halving in loudness. The table below lists examples of typical noise levels.

Sound Pressure Level (dBA)	Typical Source	Subjective Evaluation
130	Threshold of pain	Intolerable
120	Heavy rock concert	Extremely
110	Grinding on steel	noisy
100	Loud car horn at 3 m	Very noisy
90	Construction site with pneumatic hammering	
80	Kerbside of busy street	Loud
70	Loud radio or television	
60	Department store	Moderate to
50	General Office	quiet
40	Inside private office	Quiet to
30	Inside bedroom	very quiet
20	Recording studio Almost sile	

Other weightings (eg B, C and D) are less commonly used than A-weighting. Sound Levels measured without any weighting are referred to as 'linear', and the units are expressed as dB(lin) or dB.

3. Sound Power Level

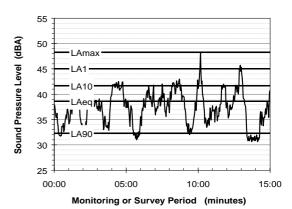
The Sound Power of a source is the rate at which it emits acoustic energy. As with Sound Pressure Levels, Sound Power Levels are expressed in decibel units (dB or dBA), but may be identified by the symbols SWL or LW, or by the reference unit 10^{-12} W.

The relationship between Sound Power and Sound Pressure is similar to the effect of an electric radiator, which is characterised by a power rating but has an effect on the surrounding environment that can be measured in terms of a different parameter, temperature.

4. Statistical Noise Levels

Sounds that vary in level over time, such as road traffic noise and most community noise, are commonly described in terms of the statistical exceedance levels LAN, where LAN is the A-weighted sound pressure level exceeded for N% of a given measurement period. For example, the LA1 is the noise level exceeded for 1% of the time, LA10 the noise exceeded for 10% of the time, and so on

The following figure presents a hypothetical 15 minute noise survey, illustrating various common statistical indices of interest.



Of particular relevance, are:

LA1 The noise level exceeded for 1% of the 15 minute interval.

LA10 The noise level exceeded for 10% of the 15 minute interval. This is commonly referred to as the average maximum noise level.

LA90 The noise level exceeded for 90% of the sample period. This noise level is described as the average minimum background sound level (in the absence of the source under consideration), or simply the background level.

LAeq The A-weighted equivalent noise level (basically, the average noise level). It is defined as the steady sound level that contains the same amount of acoustical energy as the corresponding time-varying sound.

5. Frequency Analysis

Frequency analysis is the process used to examine the tones (or frequency components) which make up the overall noise or vibration signal.

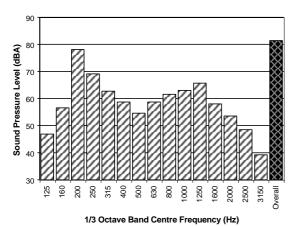
The units for frequency are Hertz (Hz), which represent the number of cycles per second.

Frequency analysis can be in:

- Octave bands (where the centre frequency and width of each band is double the previous band)
- 1/3 octave bands (three bands in each octave band)
- Narrow band (where the spectrum is divided into 400 or more bands of equal width)



The following figure shows a 1/3 octave band frequency analysis where the noise is dominated by the 200 Hz band. Note that the indicated level of each individual band is less than the overall level, which is the logarithmic sum of the bands.



6. Annoying Noise (Special Audible Characteristics)

A louder noise will generally be more annoying to nearby receivers than a quieter one. However, noise is often also found to be more annoying and result in larger impacts where the following characteristics are apparent:

- Tonality tonal noise contains one or more prominent tones (ie differences in distinct frequency components between adjoining octave or 1/3 octave bands), and is normally regarded as more annoying than 'broad band' noise.
- Impulsiveness an impulsive noise is characterised by one or more short sharp peaks in the time domain, such as occurs during hammering.
- Intermittency intermittent noise varies in level with the change in level being clearly audible. An example would include mechanical plant cycling on and off.
- Low Frequency Noise low frequency noise contains significant energy in the lower frequency bands, which are typically taken to be in the 10 to 160 Hz region.

7. Vibration

Vibration may be defined as cyclic or transient motion. This motion can be measured in terms of its displacement, velocity or acceleration. Most assessments of human response to vibration or the risk of damage to buildings use measurements of vibration velocity. These may be expressed in terms of 'peak' velocity or 'rms' velocity.

The former is the maximum instantaneous velocity, without any averaging, and is sometimes referred to as 'peak particle velocity', or PPV. The latter incorporates 'root mean squared' averaging over some defined time period.

Vibration measurements may be carried out in a single axis or alternatively as triaxial measurements (ie vertical, longitudinal and transverse).

The common units for velocity are millimetres per second (mm/s). As with noise, decibel units can also be used, in which case the reference level should always be stated. A vibration level V, expressed in mm/s can be converted to decibels by the formula 20 log (V/Vo), where Vo is the reference level (10-9 m/s). Care is required in this regard, as other reference levels may be used.

8. Human Perception of Vibration

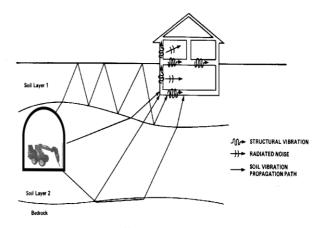
People are able to 'feel' vibration at levels lower than those required to cause even superficial damage to the most susceptible classes of building (even though they may not be disturbed by the motion). An individual's perception of motion or response to vibration depends very strongly on previous experience and expectations, and on other connotations associated with the perceived source of the vibration. For example, the vibration that a person responds to as 'normal' in a car, bus or train is considerably higher than what is perceived as 'normal' in a shop, office or dwelling.

9. Ground-borne Noise, Structure-borne Noise and Regenerated Noise

Noise that propagates through a structure as vibration and is radiated by vibrating wall and floor surfaces is termed 'structure-borne noise', 'ground-borne noise' or 'regenerated noise'. This noise originates as vibration and propagates between the source and receiver through the ground and/or building structural elements, rather than through the air.

Typical sources of ground-borne or structure-borne noise include tunnelling works, underground railways, excavation plant (eg rockbreakers), and building services plant (eg fans, compressors and generators).

The following figure presents an example of the various paths by which vibration and ground-borne noise may be transmitted between a source and receiver for construction activities occurring within a tunnel.



The term 'regenerated noise' is also used in other instances where energy is converted to noise away from the primary source. One example would be a fan blowing air through a discharge grill. The fan is the energy source and primary noise source. Additional noise may be created by the aerodynamic effect of the discharge grill in the airstream. This secondary noise is referred to as regenerated noise.



APPENDIX B

SLR Author CV



CURRICULUM VITAE



JOSHUA RIDGWAY

SENIOR PROJECT CONSULTANT

Acoustics & Vibration, Asia-Pacific

QUALIFICATIONS

MDesSc	2008	Master of Design Science (Audio and Acoustics), University of Sydney, NSW
DipPM	2018	Diploma of Project Management, Charter Australia Education and Training, NSW

EXPERTISE

- Transport (Rail, Road and Air) Noise and Vibration
- Construction Noise and Vibration
- Infrastructure and Industrial Noise and Vibration
- Noise and Vibration Measurement Systems

Joshua completed his Master of Design Science (Audio and Acoustics) at University of Sydney in 2008 and has been a consultant at SLR since 2011.

Joshua has worked on a broad range of assessments involving field measurements, analysis, modelling and reporting of construction and operational impacts from a variety of projects.

Joshua has a Diploma of Project Management and extensive experience in delivering key transportation infrastructure projects in NSW.

Joshua brings detailed knowledge of noise predictive software, including SoundPLAN, through his previous experience of modelling some of NSW's most complex infrastructure projects.

PROJECTS

Transport Noise and Vibration Projects Blackwattle Bay Transport Ambient noise monitoring, construction noise and vibration assessment, lead Improvements REF, NSW modeller for operational noise impacts and assessment. M12 Motorway EIS & AR, Ambient noise monitoring, construction noise and vibration assessment, lead NSW modeller for operational noise impacts and assessment. WestConnex M4-M5 Link Ambient noise monitoring, construction noise and vibration assessment, lead modeller for operational noise impacts and assessment. EIS & Post-Approval Works, M4 Smart Motorways EIS, Ambient noise monitoring, operational noise assessment and modelling. M4 Widening EIS and WestConnex M4 East EIS, NSW Northern Beaches Hospital Ambient noise monitoring, operational noise assessment and modelling. Road Network Upgrade EIS, NSW



CBD and South East Light Rail EIS & Post-Approval Works, NSW	Noise and vibration environmental impact assessment. Post-commissioning operational noise and vibration measurements and compliance assessment.
North West Rail Link EIS and Sydney Metro EIS, NSW	Ambient noise monitoring, operational and construction noise assessments and modelling.
Northern Sydney Freight Corridor, NSW	Operational noise assessment and modelling.
Sydney Light Rail, NSW	Operational noise and vibration measurements and compliance assessment.
	Industrial/Construction Projects
Oakdale Central, South and West Industrial Developments, NSW	Project manager and lead modeller for noise impact assessments for State Significant Development applications for large multi-stage industrial developments from DA stage to occupation and compliance stage, and preparation of construction and operational noise and vibration management plans.
Enfield Intermodal Logistics Centre, NSW	Preparation of construction and operational noise and vibration management plans.
Metropolitan Colliery, NSW	Ambient noise monitoring, operational noise measurements, risk assessment and noise mitigation strategy.
	Built Environment Projects
Marsden Park North Precinct, NSW	Road traffic and ambient noise monitoring, assessment of noise impacts associated with the Precinct.
The Sheffield, Thornton, NSW	Acoustic assessment and advice for DA stage to CC stage mixed-use development.
Saint Mary Mackillop Catholic Church, Oran Park, NSW	Acoustic assessment and advice for CC to OC stage place of worship development.
Various Residential Developments, Epping, NSW	Acoustic assessment for DA stage residential developments.
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APPENDIX H

Construction Air Quality Management Plan

OAKDALE WEST INDUSTRIAL ESTATE - LOT 2C/2D

Construction Air Quality Management Plan

Prepared for:

Goodman Property Services (Aust) Pty Ltd
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BASIS OF REPORT

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

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

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

DOCUMENT CONTROL

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1 Introduction

SLR Consulting Australia Pty Ltd (SLR) has been commissioned by Goodman Property Services (Aust) Pty Ltd (Goodman) to prepare an Air Quality Management Plan (AQMP) for Lots 2C and 2D (Development Site) within Precinct 2 of the Oakdale West Estate (OWE) located in the western Sydney area of Kemps Creek, New South Wales (NSW).

A construction-phase AQMP for construction for the OWE was finalised by SLR in January 2020 (SLR 2020), which was required under Condition D100 of the Development Consent for State Significant Development 7348 (SSD 7348).

Whilst Development Consent SSD 7348 has been granted for the OWE 'Concept Proposal' and 'Stage 1 Development', this CAQMP is specifically for the construction of Lots 2C and 2D. The development of Lots 2C and 2D was approved under SSD 9794683. The sections this AQMP related to the construction works generally adhere to the requirements stipulated in the overarching OWE AQMP.

1.1 Development Overview

The OWE is a regional warehouse and distribution hub, located at Kemps Creek within the Penrith Local Government Area (LGA) and forms part of the broader Oakdale Industrial Precinct located within the Western Sydney Employment Area (WSEA).

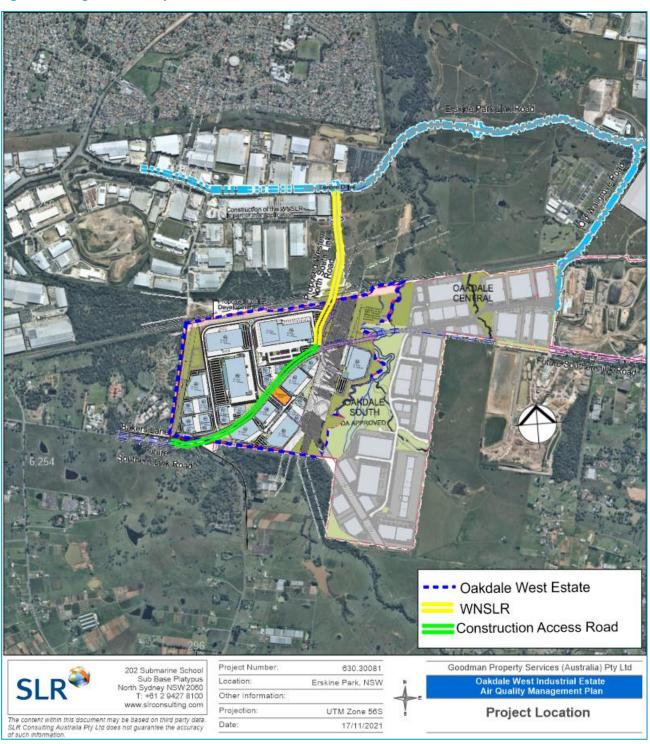
The OWE is bound to the north by the Water NSW Pipeline and to the east by the Ropes Creek riparian corridor. Land along the eastern boundary of the site is also affected by a transmission easement associated with Transgrid infrastructure. To the east of the site is Goodman's Oakdale South Estate. Emmaus Catholic College and Emmaus Retirement Village are located to the west of the site. Other boundaries interface with adjoining rural lands accommodating a mix of rural-residential and agricultural uses (see **Figure 1**).

Development Consent for the OWE was granted for the OWE 'Concept Proposal', 'Stage 1 Development' and all subsequent development stages. The Concept Proposal essentially comprises a Master Plan to guide the staged development of OWE and core development controls that will form the basis for design and assessment of future development applications for the site. It includes:

- Establishing primary site access, road layouts (including internal road network and connections to the
 external road network), developable and non-developable lands, biodiversity offsets, indicative
 development stages and development controls for the future development of the site;
- Development of the Estate, including:
 - Estate Works, including site preparation, bulk earthworks and retaining walls, catchment level stormwater infrastructure, trunk services connections and utility infrastructure, roads and access infrastructure associated with Stage 1 and subdivision in Stage 1 development works;
 - Precinct Development, including construction, fit out and use of warehouse buildings within Precincts 1-5, detailed earthworks, on lot stormwater, services and utility infrastructure and construction of industrial/warehouse buildings;
 - Construction of a new regional road known as the Western North South Link Road (WNSLR)
 connecting to Lenore Drive to provide the primary access to the site (now complete); and
 - Western boundary landscaping.



Figure 1 Regional Locality



This AQMP has been prepared to cover the construction of Lots 2C and 2D. Lots 2C and 2D are located in Precinct 2 of the OWE as shown in **Figure 2**. At the time of writing this report, a Construction Contractor has yet to be engaged. Building 2C comprises the following:

Construction and fit out of two adjoining warehouse buildings;



- Building 2C-1 warehouse (5,150 sqm) with loading bays and dual office facilities;
- Building 2C-2 warehouse (4,735 sqm) with loading bays and dual office facilities;
- Truck delivery access, two car parking areas with dedicated entrances; and one heavy vehicle entrance;
- site landscaping; signage; and
- Lighting.

Building 2D comprises the following:

- Construction and fit out of a single 5,860 sqm warehouse buildings with loading bays and dual office facilities;
- Truck delivery access, two car parking areas with dedicated entrances; and one heavy vehicle entrance;
- site landscaping; signage; and
- Lighting.

For the purposes of this document, the development is described in *Environmental Impact Statement, Oakdale West Estate - State Significant Development Application* (EIS) prepared by Urbis (2017), including all specialist assessments and other appendices.

Figure 2 Oakdale West Masterplan





1.2 Objectives of this AQMP

The objectives of this AQMP are as follows:

- Details of all emissions from all construction activities, including fugitive particulate emissions and vehicle emissions;
- A program that is capable of evaluating the performance of air quality management during construction, and determining compliance with key performance indicators (KPIs);
- Identification of control measures that may be suitable for each emission source;
- Relevant regulatory requirements, including development consents, guidelines and air quality limits/criteria;
- Location of sensitive receivers;
- Air Quality management commitments and responsibilities, including air quality compliance monitoring and reporting requirements (where relevant); and
- Potential contingency measures in the event of an air quality criterion exceedance.



2 Statutory Requirements

The Development Consent requirements stipulated for the construction of Lots 2C and 2D under SSD 7348 (construction) and SSD 9794683 (construction), and where they have been addressed in this AQMP, are shown in **Table 1** and **Table 2** respectively.

Table 1 SSD 7348 Conditions

		Response / Section					
Condition	ons	Reference					
Condition	on D98 (Dust Minimisation)						
	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent. Section 8						
Condition	on D99 (Dust Minimisation)						
(a)	construction of Stage 1, the Applicant must ensure that: exposed surfaces and stockpiles are suppressed by regular watering and or other dust suppression methods;						
(c) (d)	all trucks entering or leaving the Site with loads have their loads covered; trucks associated with Stage 1 do not track dirt onto the public road network; public roads used by these trucks are kept clean; and land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Section 8					
Condition	on D100 (Construction Air Quality Management Plan)						
(a)	be prepared by a suitably qualified and experienced person(s)	2-page CV of the author is attached in Appendix E					
(b)	detail and rank all emissions from all construction activities, including particulate emissions	Section 4 and Section 7					
(c)	describe a program that is capable of evaluating the performance of the construction and determining compliance with key performance indicators	Section 10					
(d)	identify the control measures that will be implemented for each emission source	Section 8					
(e)	nominate the following for each of the proposed controls: - key performance indicator - monitoring method - location, frequency and duration of monitoring - record keeping - complaints register - response procedures - compliance monitoring	Section 8 and Section 10					
Condition	on D118 (Management Plan Requirements)						
(a)	 details of: the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures and criteria; and the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, Stage 1 or any management measures; 	Section 5.2					



Conditio	ons	Response / Section Reference
(b)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Section 8
(c)	 a program to monitor and report on the: i. impacts and environmental performance of Stage 1; and ii. effectiveness of the management measures set out pursuant to paragraph (b) above; 	Section 10
(d)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Section 11
(e)	a program to investigate and implement ways to improve the environmental performance of Stage 1 over time;	Section 10 and Section 13
(f)	 a protocol for managing and reporting any: i. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); ii. complaint; iii. failure to comply with statutory requirements; and 	Section 9 and Appendix D See overarching CEMP
(g)	a protocol for periodic review of the plan.	Section 13

Table 2 SSD 9794683 Conditions

Conditions	Response / Section Reference
Condition B30 (Dust Minimisation)	
The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Section 8
Condition B31 (Dust Minimisation)	
During construction of the development, the Applicant must comply with the dust minimisation measures detailed in the Construction Environmental Management Plan required by Condition C2.	Section 8

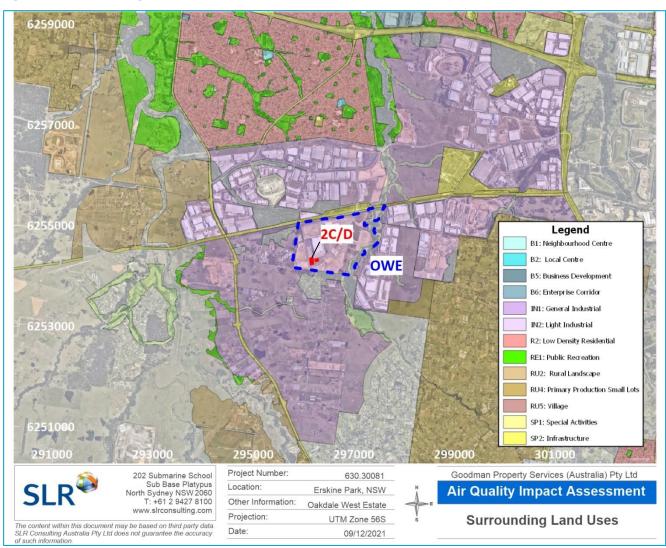


3 Project Overview

3.1 Surrounding Land Uses

The area immediately surrounding the OWE is zoned light or general industrial, (see **Figure 3**) and includes land uses such as industrial warehouses and factories, several of which have been identified as having the potential to be considered sources of air emissions. The nearest residential receptors to the OWE boundary are located approximately 50 metres (m) south on Aldington Road, Erskine Park. However, Precinct 2 is located on the north western side of the OWE and is approximately 200 m away from the nearest sensitive receptor (the Emmaus College building).

Figure 3 Surrounding Land Use

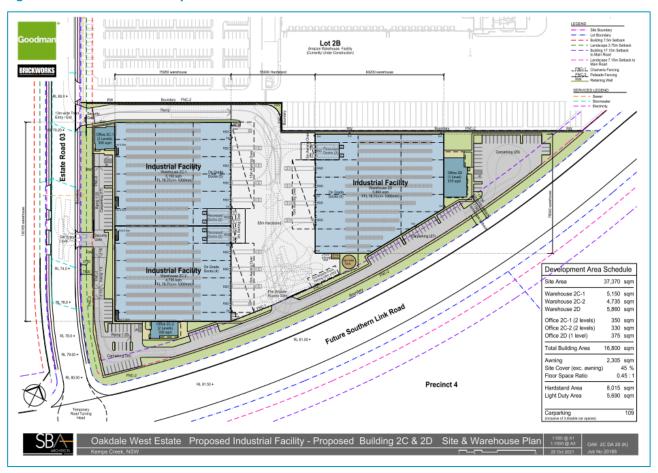




3.2 Lots 2C and 2D Layout

The Lots 2C and 2D layout is shown in Figure 4.

Figure 4 Lots 2C and 2D Layout



3.3 Construction Activities

3.3.1 Proposed Works

This AQMP relates to the construction works to be undertaken on Lots 2C and 2D at Precinct 2.

No vegetation clearing, bulk earthworks or supporting infrastructure will be required as part of this Project as this has been approved and undertaken as part of Stage 1 in accordance with SSD 7348.

All works will be undertaken in accordance with the Approved Development Consent SSD 9794683.

The activities to be undertaken include:

- Minor earthworks to prepare foundations/footings for the buildings to be constructed
- Construction of a 10,235 m² steel framed and steel-clad warehouse



- Construction of 5,085 m² steel framed and steel-clad warehouse
- Sealing of internal roads and hardstand areas,
- Fit out of warehouse and offices

3.3.2 Construction Hours

Construction hours will be in accordance with Conditions B7 and B8 of Development Consent SSD 9794683, which are reproduced below:

B7. The Applicant must comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Planning Secretary.

Table 2: Hours of Work

Activity	Day	Time
Construction	Monday – Friday Saturday	7 am to 6 pm 8 am to 1 pm

B8. Works outside of the hours identified in Condition B7 may be undertaken in the following circumstances:

- a) works that are inaudible at the nearest sensitive receivers;
- b) works agreed to in writing by the Planning Secretary;
- c) for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
- d) where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.

The construction hours will be provided to all staff and contractors in the induction. The movements of staff and contractors will be recorded for this project.

3.3.3 Construction Contact Details

Table 3 lists the key contacts during the construction of Lots 2C and 2D.

Table 3 Construction Contact List

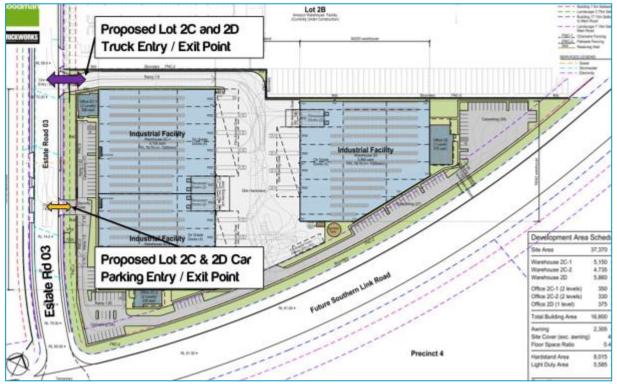
Role	Name	Company	Contact Details
Project Principal/Superintendent	TBC	TBC	TBC
Contractor's Project Manager	TBC	TBC	TBC
Contractor's WHS&E Advisor	TBC	TBC	TBC
Environmental Representative	Carl Vincent	ERSED	0424 203 046 carl.vincent@ersed.com.au
Communications and Community Liaison Representative	Dan Thompson	SLR	0428 060 995 dthompson@slrconsulting.com



3.3.4 Construction Site Access

During construction, heavy vehicles will access travel south from the site towards Estate Road 03, then northeast to exit at northern boundary of the OWE precinct. Two car entry/exit points will also be provided directly onto Compass Drive to facilitate access to the proposed car parking areas, as shown in **Figure 5**.

Figure 5 Construction Site Access



Source: ASON 2021



4 Potential Sources of Air Emissions During Construction

During the construction works, fugitive dust emissions are considered to be the primary air emission type, which could give rise to nuisance and/or health impacts for the surrounding sensitive areas. The key potential sources of dust associated with construction of Lots 2C and 2D have been identified as:

- Dust emissions from earthworks activities (e.g. excavation and loading of soils to trucks);
- Wind-generated dust from disturbed surfaces and stockpiles;
- Wheel-generated dust and particulate matter emissions in diesel exhaust emissions from on-site plant and equipment and construction traffic movements; and
- Particulate matter associated with exhaust emissions from increased/congested traffic emissions on the local road network due to road closures or diversions (if any).

In addition to the construction activities being carried out at any point in time, a number of other environmental factors may also affect the generation and dispersion of dust emissions, including:

- Wind direction determines whether dust and suspended particles are transported in the direction of the sensitive receptors;
- Wind speed governs the potential suspension and drift resistance of particles;
- Surface type more erodible surface material types have an increased soil or dust erosion potential;
- Surface material moisture increased surface material moisture reduces soil or dust erosion potential;
- Other external factors such as current works being undertaken by others outside of the defined Project boundaries and current climatic (dry) weather conditions;
- Rainfall or dew rainfall or heavy dew that wets the surface of the soil reduces the risk of dust generation.

The Environmental Impact Statement (EIS) for the construction and operation of the whole OWE was prepared by Urbis in November 2017 (Urbis 2017). Appendix U (Air Quality Impact Assessment) of the EIS states that the main emissions to air during the construction phase will be emissions of suspended particulate matter and nuisance dust from the movement of vehicles and construction equipment, excavation and rehabilitation, demolition, clearing and grading and unloading and wind erosion. The same sources, excluding excavation and rehabilitation, demolition, clearing and grading (which related to the Stage 1 works), are also identified for construction of Lots 2C and 2D.

The proposed construction activities are broadly divided into three categories i.e. earthworks, construction (building) and trackout. Potential air quality impacts associated with construction of Lots 2C and 2D and the relative risk ratings are addressed in **Section 7**.



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5 Relevant Pollutants and Air Quality Criteria

5.1 Pollutants of Concern

The potential air pollutants of interest during construction of Lots 2C and 2D are suspended particulate matter, deposited dust and the products of fuel combustion.

The following sections outline the potential health and amenity issues associated with the above pollutants, while **Section 5.2** outlines relevant air quality assessment criteria.

Suspended Particulate Matter

Airborne contaminants that can be inhaled directly into the lungs can be classified on the basis of their physical properties as gases, vapours or particulate matter. In common usage, the terms "dust" and "particulates" are often used interchangeably. The term "particulate matter" refers to a category of airborne particles, typically less than 30 microns (μ m) in diameter and ranging down to 0.1 μ m and is termed total suspended particulate (TSP).

The annual criterion for TSP recommended by the NSW EPA is 90 micrograms per cubic metre of air ($\mu g/m^3$). The TSP criterion was developed before the more recent results of epidemiological studies which suggested a relationship between health impacts and exposure to concentrations of finer particulate matter.

Emissions of particulate matter less than $10\,\mu m$ and $2.5\,\mu m$ in diameter (referred to as PM_{10} and $PM_{2.5}$ respectively) are considered important pollutants due to their ability to penetrate into the respiratory system. In the case of the $PM_{2.5}$ category, recent health research has shown that this penetration can occur deep into the lungs. Potential adverse health impacts associated with exposure to PM_{10} and $PM_{2.5}$ include increased mortality from cardiovascular and respiratory diseases, chronic obstructive pulmonary disease and heart disease, and reduced lung capacity in asthmatic children.

Deposited Dust

The above section is concerned in large part with the health impacts of particulate matter. Nuisance impacts need also to be considered, mainly in relation to deposited dust. Dust can cause nuisance by settling on surfaces and possessions, affecting visibility and contaminating tank water supplies. High rates of dust deposition can also adversely affect vegetation by blanketing leaf surfaces.

Oxides of Nitrogen

 NO_X is a general term used to describe any mixture of nitrogen oxides formed during combustion. In atmospheric chemistry NO_X generally refers to the total concentration of nitric oxide (NO) and nitrogen dioxide (NO₂). NO will be converted to NO_2 in the atmosphere after leaving a car exhaust.

NO is a colourless and odourless gas that does not significantly affect human health. However, in the presence of oxygen, NO can be oxidised to form NO_2 which can have significant health effects including damage to the respiratory tract and increased susceptibility to respiratory infections and asthma. Long term exposure to NO_2 can lead to lung disease.



Carbon Monoxide

CO is an odourless, colourless gas formed from the incomplete burning of fuels in motor vehicles. CO bonds to the haemoglobin in the blood and reduces the oxygen carrying capacity of red blood cells, thus decreasing the oxygen supply to the tissues and organs, in particular the heart and the brain.

It can be a common pollutant at the roadside and highest concentrations are found at the kerbside with concentrations decreasing rapidly with increasing distance from the road. CO in urban areas results almost entirely from vehicle emissions and its spatial distribution follows that of traffic flow.

Sulphur Dioxide

 SO_2 is a colourless, pungent gas with an irritating smell. When present in sufficiently high concentrations, exposure to SO_2 can lead to impacts on the upper airways in humans (i.e. the noise and throat irritation). SO_2 can also mix with water vapour to form sulphuric acid (acid rain) which can damage vegetation, soil quality and corrode materials.

The main sources of SO₂ in the air are industries that process materials containing sulphur (i.e. wood pulping, paper manufacturing, metal refining and smelting, textile bleaching, wineries etc.). SO₂ is also present in motor vehicle emissions, however since Australian fuels are relatively low in sulphur, high ambient concentrations are not common.

Volatile Organic Compounds

VOCs are organic compounds (i.e. contain carbon) that have high vapour pressure at normal room-temperature conditions. Their high vapour pressure leads to evaporation from liquid or solid form and emission release to the atmosphere.

VOCs are emitted by a variety of sources, including motor vehicles, chemical plants, automobile repair services, painting/printing industries, and rubber/plastics industries. VOCs that are often typical of these sources include benzene, toluene, ethylbenzene and xylenes (often referred to as 'BTEX'). Biogenic (natural) sources of VOC emissions (e.g. vegetation) are also significant.

Impacts due to emissions of VOCs can be health or nuisance (odour) related. Benzene is a known carcinogen and a key VOC linked with the combustion of motor vehicle fuels.

5.2 Ambient Air Quality Criteria

There are no air quality criteria specified within Development Consent SSD 9794683, therefore the NSW EPA criteria have been adopted, as discussed below.

Products of Combustion

Section 7.1 of the Approved Methods set out impact assessment criteria for the air pollutants identified in **Section 5.1**. The criteria listed in the Approved Methods are derived from a range of sources (including NHMRC, NEPC, WHO, ANZEEC and DoE). The criteria specified in the Approved Methods are the defining ambient air quality criteria for NSW, and are considered to be appropriate for the setting. The following sections outline the potential health impacts of each of the identified pollutants, and the relevant criteria from the Approved Methods are summarised in **Table 4**.



Table 4 Air Quality Assessment Criteria

		Ambient Air Qu	Ambient Air Quality Criterion		
Pollutant	Averaging Period	μg/m³	pphm		
Total suspended particulate (TSP)	Annual	90	-		
Particulate matter less than	24-Hour	50	-		
10 microns (PM ₁₀)	Annual	25	-		
Particulate matter less than	24-Hour	25	-		
2.5 microns (PM _{2.5})	Annual	8	-		
Nitragan diavida (NO.)	1-hour	246	12		
Nitrogen dioxide (NO ₂)	Annual	62	3		
	15-minutes	100,000	8,700		
Carbon monoxide (CO)	1-hour	30,000	2,500		
	8-hour	10,000	900		
	10-minutes	712	25		
Sulfur dioxide (SO ₂)	1-hour	570	20		
Sullur dioxide (SO ₂)	24-hour	228	8		
	Annual	60	2		
Benzene	1-hour	29	0.9		
Toluene	1-hour	360	9		
Ethylbenzene	1-hour	8,000	180		
Xylenes	1-hour	190	4		

In relation to the air quality criteria shown in **Table 4**, it is noted that on 18 May 2021, the National Environment Protection Council (NEPC) varied the National Environment Protection (Ambient Air Quality) Measure (hereafter the Ambient Air NEPM) standards for ozone, NO_2 and SO_2 based on the latest scientific understanding of the health risks arising from these pollutants. In addition, the updated Ambient Air NEPM includes a reduced goal for $PM_{2.5}$ by 2025. As the ambient air quality criteria set out in the Approved Methods are based on the standards in the Ambient Air NEPM, and given that this assessment is based on traffic projections out to 2041, an assessment of the proposal's compliance with the new standards set out in the Ambient Air NEPM has also been performed. A summary of the updated standards for NO_2 and $PM_{2.5}$ is provided below in **Table 5**.

Table 5 Recent Changes to National Ambient Air Quality Criteria Relevant to this Assessment

Pollutant	Averaging Period	Previous NEPM Standard (μg/m³)	New NEPM Standard (μg/m³)
NO ₂	1-Hour	246	165
	Annual	62	31
PM _{2.5}	24-Hour	25	20
	Annual	8	7



Deposited Dust

The relevant criterion for nuisance dust deposition is provided in **Table 6**. The rate of dust deposition is measured by means of a collection gauge, which catches the dust settling over a fixed surface area and over a period of about 30 days.

Table 6 NSW EPA Criterion of Nuisance Dust Deposition

Pollutant	Averaging Period	Assessment Criteria (g/m²/month)
Deposited dust		(maximum increase in deposited dust level) (maximum total deposited dust level)

5.3 Local Government Air Quality Toolkit

The NSW EPA has developed the Local Government Air Quality Toolkit (EPA 2018), in response to requests from local Council officers for information and guidance on the common air quality issues they manage. Guidance is available under Part 3 of the Local Government Air Quality Toolkit for Construction Sites.

This document lists the common sources of emissions and mitigation and management measures to control airborne dust levels from construction sites and has been consulted in the development of this CAQMP.



6 Existing Environment

6.1 Local Meteorology

The Bureau of Meteorology (BoM) maintains and publishes data from weather stations across Australia. The closest such station recording wind speed and wind direction data is the Horsley Park Automatic Weather Station (AWS) (Station ID 67119), located approximately 5.5 km southeast of the OWE. The long term and short term seasonal wind roses and long term rainfall patterns observed at the Horsley Park AWS indicate that:

- Winds that would blow air emissions from Lots 2C and 2D towards the nearest sensitive receptors located
 to the west and south of the proposed site occur rarely during autumn and winter and are more likely to
 occur during summer and spring.
- The long-term wind and rainfall patterns suggest that construction activities at the Development Site have the greatest potential to impact on surrounding sensitive receptors during the months of May (autumn), and July to October (mid-winter to spring).

Full analysis of the wind roses and rainfall data can be found in Appendix A.

6.2 Background Air Quality

The nearest DPIE-operated air quality monitoring stations (AQMS) to the proposal is located at St Marys. The St Marys AQMS was commissioned in 1992, and is located on a residential property 5.5 km northwest of the proposal at an elevation of 29 m, and monitors the concentration levels of following air pollutants:

- Oxides of nitrogen (NO, NO₂ and NO_X)
- Fine particles (PM_{2.5} and PM₁₀)

Due to unavailability of ambient concentrations for CO and SO₂ from St Marys AQMS, data is being sought from Prospect AQMS. The Prospect AQMS is located 21 km to the east of the proposal. It was commissioned in February 2007 and is located at William Lawson Park, Prospect, in a residential area and is at an elevation of 66 m. The Prospect AQMS is also located within 1 km of major road infrastructure (Great Western Highway and M4 Motorway). The Prospect AQMS monitors the concentration levels of following air pollutants:

- Oxides of nitrogen (NO, NO₂ and NO_x)
- Fine particles (PM_{2.5} and PM₁₀)
- Sulfur Dioxide (SO₂)
- Ozone (O₃)
- Carbon Monoxide (CO)

Both St Marys and Prospect AQMSs are a part of the Sydney northwest air quality monitoring region.

The available air monitoring data from the St Marys AQMS are summarised in **Table 7** (red font indicates an exceedance of the relevant criterion) and presented graphically in **Figure 6** to **Figure 7**. Air monitoring data from the Prospect AQMS are summarised in **Table 8** and presented graphically in **Figure 8**.

A review of the ambient air quality data presented in the following tables and graphs shows:



- Generally, the 24-hour average PM₁₀ and PM_{2.5} concentrations recorded by the St Marys AQMS are below the relevant 24-hour average guidelines, however isolated exceedances (normally on less than ten days per year) have been recorded in most years. The exception to this was the November 2019 to January 2020 period, when unprecedented and extensive bushfires within NSW resulted in an extended period of very elevated particulate concentrations across Sydney that were significantly above the 24-hour average PM₁₀ and PM_{2.5} guidelines. A review of the available compliance monitoring reports indicates that the intermittent exceedance days recorded during the other years were also primarily due to exceptional events such as bushfire emergencies, dust storms and hazard reduction burns.
- No exceedances of the annual average PM₁₀ criterion were recorded at St Marys during the five years investigated, however the annual average PM_{2.5} criterion was exceeded in 2019 due to the bushfire event that started in November 2019.
- Ambient concentrations of the gaseous pollutants NO₂, CO and SO₂ were all well below the relevant criteria for all years investigated.

Table 7 Summary of Ambient PM₁₀, PM_{2.5} and NO₂ Data - St Marys AQMS (2017 – 2021)

PM ₁₀ (μg/m³)			PM _{2.5} (μg/m³)		NO ₂ (μg/m³)				
Year	24-H	ours	Annual	24-H	ours	Annual	1-hour		Annual
	Maximum	90 th %ile		Maximum	90 th %ile		Maximum	90 th %ile	
2017	49.8	26.1	16.2	38.2 (3)	10.7	7.0	76	21	8.1
2018	100.5 (2)	29.7	19.4	80.5 (3)	11.3	7.8	76	25	9.6
2019	159.8 (26)	41.9	24.7	88.3 (21)	16.3	9.8	68	21	7.6
2020	260.3 (11)	30.9	18.9	82.5 (9)	11.1	7.6	70	18	7.4
2021	54.9 (1)	25.9	16.2	40.3 (1)	9.5	5.8	68	18	8.1
Criterion	5	0	25	2	5	8	24	16	62

Notes: %ile = Percentile; ND = No Data; Number in brackets is the number of exceedances



Figure 6 24-Hour Average PM₁₀ and PM_{2.5} Concentrations - St Marys AQMS

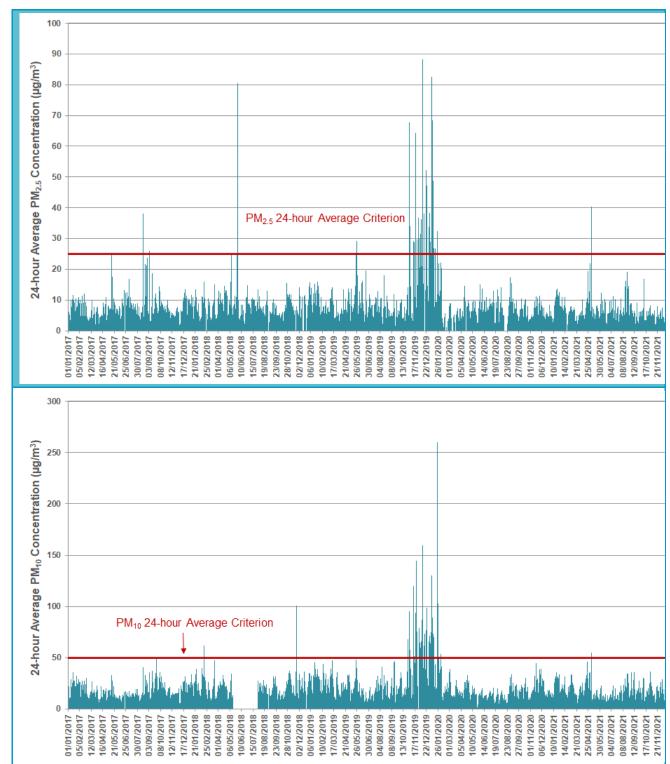




Figure 7 1-Hour Average NO₂ Concentrations - St Marys AQMS

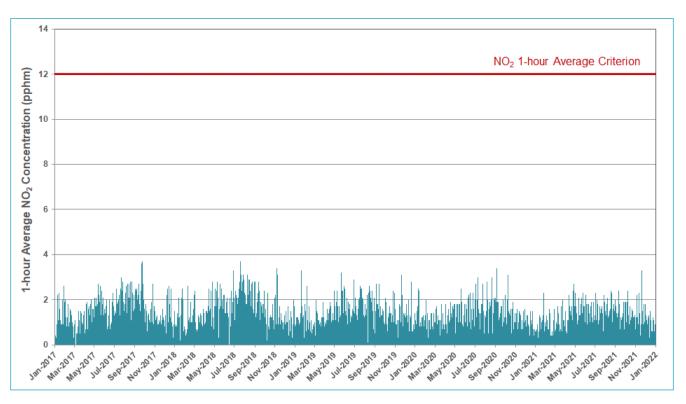


Table 8 Summary of Ambient CO and SO₂ Data - Prospect AQMS (2017 – 2021)

Pollutant		CO (mg/m³)			SO ₂ (μg/m³)				
Averaging	1-Hc	our	8-Ho	urs	1-Hc	our	24-H	ours	Annual
Period	Maximum	90 th %ile	Maximum	90 th %ile	Maximum	90 th %ile	Maximum	90 th %ile	
2017	2.0	0.4	1.4	0.4	65.8	5.7	11.4	4.6	1.9
2018	1.6	0.3	1.4	0.3	71.5	5.7	14.3	5.7	1.8
2019	6.9	0.4	3.5	0.4	60.1	5.7	11.4	5.7	2.0
2020	2.6	0.4	2.3	0.4	51.5	2.9	11.4	2.9	1.4
2021	1.6	0.3	1.3	0.3	42.9	2.9	8.6	2.9	1.5
All Years	6.9	0.4	3.5	0.4	71.5	4.1	14.3	4.1	1.8
Criterion	30)	10)	57	0	22	8	60

Notes: %ile = Percentile



SO₂ 1-hour Average Criterion

SO₂ 1-hour Average Criterion

SO₂ 1-hour Average Criterion

Figure 8 Rolling 8-Hour Average CO and 1-Hour Average SO₂ Concentrations - Prospect AQMS (2016 – 2020)

It has been noted in the latest NSW Annual Air Quality Statement (DPIE 2021) that air quality levels varied across the NSW depending on regions. Daily average PM_{10} levels exceeded the national standard at one or more metropolitan and regional centres on 24% (87 days) of days in 2020, compared to 48% (175 days) of days in 2019. During 2020, days with extreme air pollution were attributed to the following sources:

- 10 days due to smoke from bushfires (January and February)
- 9 days due to a combination of smoke from bushfires and dust storms (January and February)
- 4 days due to dust storms (January, February and August)
- 1 day due to smoke from hazard reductions burns (September).

Air quality in NSW was greatly affected by the unprecedented extensive bushfires between late 2019 and early 2020. In 2020, the air quality in NSW met national standards between 85% and 99% of the time across regions, a significant improvement compared to 2019 (60% to 92%).

In summary, even though the air quality is generally good in the Sydney region, there is potential for short term elevations in background particulate concentrations associated with regional events such as bushfires and dust storms etc to elevate local ambient particulate concentrations at the Development Site. Care needs to be taken to minimise emissions of dust from the construction works during these periods, to avoid exacerbating these particulate pollution events.



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7 Assessment of Dust Emissions During Construction

The key potential health and amenity issues associated with construction of Lots 2C and 2D are:

- Elevated suspended particulate concentrations (PM₁₀); and
- Nuisance due to dust deposition (soiling of surfaces) and visible dust plumes that may potentially be observed to be leaving the site.

7.1 Construction Impact Assessment Methodology

Quantitatively assessing impacts of fugitive dust emissions from construction projects using predictive modelling is seldom considered appropriate, primarily due to the uncertainty in the details of the construction activities, including equipment type, number, location and scheduling, which are unlikely to be available at the time of the assessment. Furthermore, they are also likely to change as construction progresses. In comparison, the equipment and operations of a mine or quarry are determined during the planning stages and more likely to remain consistent for long periods (several months or years).

Instead, it is considered appropriate to conduct a qualitative assessment. Potential impacts of dust emissions associated with proposed demolition and construction activities at the Development Site have been performed based on the methodology outlined in the Institute of Air Quality Management (UK) (IAQM) document, "Assessment of dust from demolition and construction" (Holman et al 2014). This guidance document provides a structured approach for classifying construction sites according to the risk of air quality impacts, to identify relevant mitigation measures appropriate to the risk (see **Appendix B** for full methodology).

The IAQM approach has been used widely in Australia for the assessment of air quality impacts from construction projects and the identification of appropriate mitigation measures, which has been accepted by regulators across all states and territories for a variety of construction projects.

The IAQM method uses a four-step process for assessing dust impacts from construction activities:

- **Step 1**: Screening based on distance to the nearest sensitive receptor; whereby the sensitivity to dust deposition and human health impacts of the identified sensitive receptors is determined.
- **Step 2**: Assess risk of dust effects from activities based on:
 - the scale and nature of the works, which determines the potential dust emission magnitude; and
 - the sensitivity of the area surrounding dust-generating activities.
- Step 3: Determine site-specific mitigation for remaining activities with greater than negligible effects.
- Step 4: Assess significance of remaining activities after management measures have been considered.

7.2 Risk Assessment

Table 9 presents the preliminary risk of air quality impacts from uncontrolled construction activities at the OWE derived using the risk matrix provided in **Table B4** in **Appendix B**, based on the identified receptor sensitivity and sensitivity of the area. It is noted that these risks are for the whole OWE construction project, not for the construction of Lots 2C and 2D in isolation.



Table 9 Preliminary Risk of Air Quality Impacts from OWE Construction Activities (Uncontrolled)

		Dus	Dust Emission Magnitude			Preliminary Risk			
Impact	Sensitivity of Area	Demolition	Earthworks	Construction	Trackout	Demolition	Earthworks	Construction	Trackout
Dust Soiling	Low	all a	Large	Large	Medium	Negligible	Low Risk	Low Risk	Low Risk
Human Health	Low	Small	Lar	Lar	Med	Negligible	Low Risk	Low Risk	Low Risk

NOTE: Assessed risks are for the whole OWE construction project, not for the construction of Lots 2C and 2D in isolation

The results indicate that there is a low risk of adverse dust soiling and a low risk of human health impacts occurring at the off-site sensitive receptor locations if no mitigation measures were to be applied to control emissions during the works.

Based on the dust emission magnitudes and the preliminary risk from these activities, the activities are ranked as (highest risk to lowest risk):

- 1. Earthworks
- 2. Construction
- 3. Track out
- 4. Demolition

For almost all construction activity, the IAQM Methods notes that the aim should be to prevent significant effects on receptors through the use of effective mitigation, and experience shows that this is generally possible.



8 Construction Mitigation Measures

The potential for dust emissions during construction of Lots 2C and 2D and the potential air quality impacts (as discussed in **Section 4**) on surrounding sensitive receptors are anticipated to be largely controllable through a range of mitigation measures, including good site management, good housekeeping measures, appropriate vehicle maintenance and applying appropriate dust mitigation measures where required. The dust mitigation measures to be implemented during construction of Lots 2C and 2D are detailed in **Table 10**, which are consistent with those stipulated in the CAQMP for the OWE (SLR 2020). The dust mitigation measures specific to the key emission activities (ie earthworks, construction, track out and demolition) are also provided in **Table 10**.

Table 10 Dust Mitigation Measures

Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes	
Communications				
The Community Communications Strategy will be implemented.	Communications and Community Liaison Representative	Prior to		
The name and contact details of person(s) accountable for air quality and dust issues will be displayed on the site boundary. This may be the Contractor's Project Manager.	Construction Contractor's	commencing construction and ongoing	Best practice	
The head or regional office contact information will be displayed on site signage.	Representative			
Site Management				
All dust and air quality incidents will be undertaken as per Section 3.5 of the CEMP.		Onceins	CEMP Section 3.5	
All dust and air quality complaints will be undertaken as per Section 3.6 of the CEMP.		Ongoing	CEMP Section 3.6	
Where excessive dust events occur (i.e. prolonged visual dust in a particular area), additional watering of dust producing activities will be undertaken or activities temporarily halted until such times that the dust source is under control.	atering of dust Ontractor's Representative		Best practice	
Horsley Park Bureau of Meteorology station weather forecast will be reviewed daily (i.e. wind, rain) to inform site dust management procedures for the day.		Daily		
Preparing and Maintaining the Site				
All reasonable steps to minimise dust generated will be undertaken during construction.	Construction		SSD 7348 Condition D98 SSD 9794683 Condition 34	
Exposed surfaces and stockpile will be suppressed by regular watering or use of approved dust suppressants.	Contractor's Representative	Ongoing	SSD 7348 Condition D99a	
Land stabilisation works will be carried out in such a way on site to minimise exposed surfaces.			SSD 7348 Condition D99e	



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes
Construction of Lots 2C and 2D will not cause or permit the emission of any offensive odour, as defined in the POEO Act.			SSD 7348 Condition D102
Dust generating activities in areas close to receptors will be closely monitored and additional mitigation applied as required to best manage potential dust emissions	Construction Contractor's Representative		
Stockpiles that will be in place for more than 20 days and are not actively used as well as any stockpiles that are susceptible to wind or water erosion will be suitably protected from erosion within 10 days of the establishment of each stockpile.		Ongoing	Best practice
Temporary stabilisation of disturbed surfaces will be undertaken within two weeks of the stockpile being established.			
Site fencing and barriers will be kept clean using wet methods.			
Operating Vehicle/Machinery and Sustainable Travel			
Trucks associated with Stage 1 will not track dirt off site and onto the public road network.			SSD 7348 Condition D99c
Project access roads used by delivery trucks will be kept clean.			SSD 7348 Condition D99d
All on-road vehicles will comply with relevant vehicle emission standards (prescribed by the NSW RMS), where applicable, and will be maintained in good condition, in accordance with manufacturer's specifications and POEO Act.			
Delivery trucks will switch off engines whilst undertaking a delivery on-site, if idling time is likely to exceed 5 minutes.	Construction Contractor's Representative	Ongoing	
Vehicle speed limit restrictions are implemented on site, including:			Best practice
• General - 20km/h			
High risk area - 10km/h			
Haul routes – 50 km/h			
Truck queuing and unnecessary trips will be minimised through logistical planning and by the identification and use of specific park up/hold areas away from the Project.			
Operations			<u>'</u>
Only cutting, grinding or sawing equipment fitted with suitable dust suppression systems, such as water sprays will be used.	Construction		
Adequate water supply will be available on the site for effective dust/particulate matter suppression/ mitigation using a combination of potable and non-potable water sources.	Contractor's Representative	Ongoing	Best practice



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes	
Water carts will be used on all denuded or exposed surfaces and unsealed roads to minimise dust emissions.				
Equipment, inclusive of, but not limited to Environmental spill kits will be readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.	Construction	Ongoing	Best practice	
Works will be assessed during strong winds or in weather conditions where high levels of airborne particulates may potentially impact the sensitive receivers. Continual monitoring of wind speed and direction will be	ks will be assessed during strong winds or in weather ditions where high levels of airborne particulates may entially impact the sensitive receivers.			
undertaken to guide this decision and ensure that adequate mitigation measures are undertaken				
Waste Management				
All trucks entering or leaving the Site will have their loads covered.	vered. waste materials, timbers or any other combustible Construction Contractor's Representative		SSD 7348 Condition D99b	
No waste materials, timbers or any other combustible materials will be burnt on site.			Best practice	
Earthworks				
Scopes of work will be planned in such a way to assist in minimising the duration that surfaces are left denuded.		Ongoing		
Rehabilitation of disturbed surfaces will be undertaken within 20 days of final construction levels.	Construction	Within 20 days of final construction levels		
If unanticipated strong odours or significant visual dust emissions are noted or observed on site, an investigation will be undertaken by the Construction Contractor Project Manager to identify the scope of work or source of the emission prior to undertaking and applying any additional mitigation measures.	Contractor's Representative	Ongoing	Best practice	
Construction				
Sand and other aggregates will not be allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.	Construction Contractor's Representative	Ongoing	Best practice	
Trackout				
Water-assisted road sweeper(s) will be used on an as required basis should any material be tracked out of the site.				
Record all regular inspections and maintenance undertaken of site haul routes and project related access roads in a site log book.	Construction Contractor's Representative	Ongoing	Best practice	
A wheel washing system and/or cattle grid system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site) will be implemented.				



Environmental Management Control	Person Responsible	Timing / Frequency	Reference / Notes	
Demolition				
Ensure effective water suppression of dust is used during demolition operations.	Construction	Ongoing	Post practice	
Bag and remove any biological debris or damp down such material before demolition.	Contractor's Representative	Ongoing	Best practice	

As required by condition D100 (e), **Table 11** summarises the parameters identified to assess the effectiveness of the control measures shown **Table 10**.

The potential for dust emissions during construction of Lots 2C and 2D and the potential air quality impacts (as discussed in Section 4) on surrounding sensitive receptors are anticipated to be largely controllable through a range of mitigation measures, including good site management, good housekeeping measures, appropriate vehicle maintenance and applying appropriate dust mitigation measures where required. The dust mitigation measures to be implemented during construction of Lots 2C and 2D are detailed in **Table 10**, which are consistent with those stipulated in the CAQMP for the OWE (SLR 2020). The dust mitigation measures specific to the key emission activities (ie earthworks, construction, track out and demolition) are also provided in **Table 10**

Table 11 Summary of the Parameters to Assess the Effectiveness of Control Measures

Parameter	Visible Dust	Dust Deposition	Complaints	PM ₁₀
Key performance indicator	No visible dust leaving the site boundary	<4 g/m²/month	No complaints related to nuisance dust	<50 μg/m³ as a 24- hour average
Monitoring method	Visual inspection / observations	Dust deposition gauges	-	See note
Location, frequency and duration of monitoring	Daily onsite inspection	Section 10	-	See note
Record keeping	Section 10	Section 10	Section 9	See note
Response procedures	Section 11	Section 11	Section 9	See note
Compliance monitoring	-	Section 10	-	See note

Note: Real-time suspended particulate monitors are installed at the site to assist with dust management (see **Section 10**). The monitoring system used however, does not meet the requirements of a compliance instrument. Should compliance-level monitoring be required as per **Table 12**, then this table will be updated to reflect the expanded monitoring programme.



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9 Complaints Handling and Response Procedure During Construction

All complaints will be handled in accordance with the sections below and the OWE *Community Communication Strategy* (CCS) (SLR 2021).

9.1 Performance Objectives

To ensure that all environmental complaints in relation to air emissions from construction of Lots 2C and 2D are promptly and effectively received, handled and addressed.

9.2 Responsibility

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

All employees who take receipt of a complaint, either verbal or written, are to immediately notify the Contractor's Project Manager, who will then contact the Communications and Community Liaison Representative.

9.3 Complaints Handling Procedure

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

1. Record and Acknowledge

Any employee who takes receipt of a complaint, either verbal or written, is to immediately notify the Contractor's Project Manager who will then contact the Communications and Community Liaison Representative. The Contractor's Project Manager will be available 24 hours a day, seven days a week and have the authority to stop or direct works.

In the normal course of events, the first contact for complaints will usually be made in person or by telephone.

The complainant's name, address and contact details, along with the nature of the complaint, must be requested. If the complainant refuses to supply the requested information, a note will be made on the form and complainant advised of this.

2. Assess and Prioritise

The Communications and Community Liaison Representative will prioritise all complaints by considering the seriousness of the complaint including risk to health and safety and will attempt to provide an immediate response via phone or email. This will be undertaken in accordance with the CCS (SLR 2021).



3. Investigate

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

If the complaint is due to an incident, the notification requirements and handling procedures outlined in CEMP will be followed.

4. Action or Rectify

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

As outlined in **Section 11**, if a complaint regarding air quality impacts is concluded to be substantiated, the need for any changes to the air quality mitigation measures identified for the Project in **Section 8** and/or the air quality monitoring programme outlined in **Section 10** is to be reviewed and, the AQMP updated as appropriate.

5. Respond to Complainant

The Communications and Community Liaison Representative and the Contract Superintendent will oversee the rectification of the issue. The Communications and Community Liaison representative will then respond to the complainant once the issue has been resolved. The complainant will be provided with a follow up verbal response on what action is proposed within two hours during night-time works (between the hours of 6:00 pm and 10:00 pm) and 24 hours at other times. Where a complaint cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant within ten days.

6. Record

It is imperative that an investigation of the situation is carried out and proposed improvements documented in order to minimise the potential for similar complaints in the future. On this basis, every complaint received is to be recorded in the Complaint Enquiry Form. A copy of the completed form will be maintained for at least five years. The complaint will also be recorded in the Complaints Register.

7. Preventative Action

Once the complaint has been suitably handled, proposed improvements will be investigated and implemented to minimise the potential of re-occurrence. The Complaint Enquiry Form will not be closed out until the preventative actions are completed and recorded on the form.

9.4 Complaints Register

A Complaints Register will be maintained during construction and will contain the following:

- A copy of the environmental complaint handling procedure;
- A separate reference sheet containing the contact details;



- Blank hard copies of the Complaint Enquiry Form; and
- Copies of all completed Complaint Enquiry Forms, which are to be maintained for at least five years after the event to which they relate.

10 Air Quality Monitoring Program During Construction

As discussed in **Section 7**, the risk of OWE construction dust emissions causing nuisance impacts at off-site sensitive receptor locations is concluded to be low. It is also noted that any impacts will be temporary and managed through the implementation of appropriate mitigation measures (see **Section 8**).

An air quality monitoring program has been implemented by Goodman as part of the management of air emissions during construction of the OWE. The data from ongoing monitoring program for OWE will be utilised to inform the management measures and contingency response for the construction of Lots 2C and 2D.

The data from ongoing monitoring program for OWE will be utilised to inform the management measures and contingency response for the construction of Lots 2C and 2D.

A summary of the on-site air quality monitoring programme at the OWE is shown in **Table 12**. The locations of these monitors are shown in **Figure 9**. Further details are provided in the OWE AQMP.

Table 12 Summary of On-Site Monitoring Programme

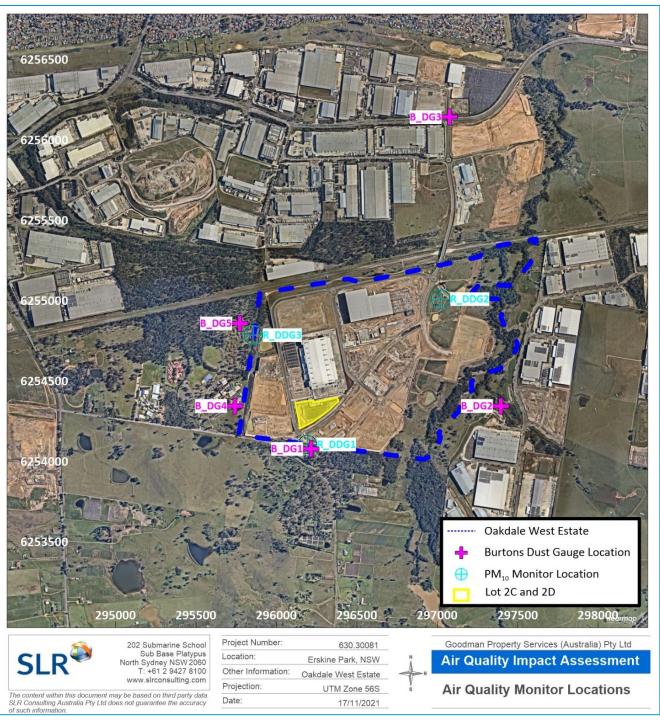
Pollutant	Equipment Used	Number of Monitoring Sites	Criterion (Averaging Period)
PM ₁₀	Dust Pro 7000 ^a (with telemetric capacity managed by Sentinex systems)	3	50 μg/m³ (24-hour average)
Deposited dust	Dust Deposition Gauges (DDGs) - Burtons b	7	4 g/m²/month (annual average)

^a The Dust Pro 7000 system is non-compliant with the *Approved Methods for Sampling and Analysis of Air Pollutants in NSW* (December 2006), and is used as a management tool to proactively manage the onsite operations to reduce dust impacts.



b The dust gauges were installed and maintained by construction contractor (Burtons). It has not been confirmed by SLR if the installation of these dust gauges was undertaken in compliance with the AS/NZS 3580.1.1:2016.

Figure 9 Air Quality Monitoring Locations for the OWE Construction Project



Note: The yellow highlighted area represents approximate area covered by Lots 2C and 2D.

11 Contingency Management Plan During Construction

The air quality contingency management plan for the construction of Lots 2C and 2D is shown in **Table 13**. As noted in **Section 10**, data from the ongoing construction-phase monitoring program for the OWE will be utilised to inform the appropriate contingency response for the construction of Lots 2C and 2D.



Table 13 Air Quality Contingency Management Plan for the Construction of Lots 2C and 2D

Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Visible dust	Trigger	Daily inspections show that there is no visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site.	Daily inspections show that there is visible dust leaving the site multiple times during a day OR from multiple locations within the site.
leaving the site	Response	Continue monitoring program as normal.	Review and investigate construction activities and respective control measures. Where appropriate, implement additional remedial measures, such as: • Deployment of additional water sprays, water trucks etc	Undertake an investigation of the dust generating activities, and if necessary, temporarily halt the dust generating activities
	Trigger	Dust deposition rates are less than 4 g/m²/month at all the dust gauges.	Dust deposition rate greater than 4 g/m²/month is recorded by any of the dust gauges	Dust deposition rates greater than 4 g/m²/month are recorded by two or more dust gauges for two months in a row.
Dust deposition reading of >4g/m²/month	Response	Continue monitoring program as normal.	 OWE Project Manager to analyse data to try to identify the source(s) of dust. Construction Contractor to review operations to reduce dust emissions from the identified key source(s). Implement any additional mitigation measures as required, such as additional watering. 	 OWE Project Manager to review and investigate construction activities and respective control measures for the monitoring period. If it is concluded that construction activities at Lots 2C and 2D were directly responsible for the exceedance (i.e. the exceedance event was not caused due to high regional dust levels or local non-project dust source), Construction Contractor to submit an incident report to government agencies.



Key Element	Trigger / Response	Condition Green	Condition Amber	Condition Red
Complaints received regarding nuisance dust Trigger C Response		There are no complaints received during the construction	An air-quality related complaint is received from a nearby resident	Further complaints are received from the same complainant after the additional mitigation measures have been implemented
		Continue monitoring program as normal.	 Report the complaint to the regulator, in line with complaints handling procedure (See Section 9). Review and investigate construction activities and increase dust suppression measures (additional watering, covering stockpiles etc), where appropriate. 	Review real-time monitoring data at the existing continuous monitors to investigate the likelihood of onsite activities contributing.
	Trigger	Running 24-hour average PM ₁₀ concentrations < 40 µg/m ³	Running 24-hour average PM $_{10}$ concentrations >40 $\mu g/m^3$ but <50 $\mu g/m^3$	Running 24-hour average PM ₁₀ concentrations >50 μg/m ³
Real-time suspended particulate matter monitoring (TSP and PM ₁₀)	Response	Continue monitoring program as normal.	 OWE Project Manager to review and investigate construction activities and respective control measures. Where appropriate, implement additional remedial measures, such as: Deployment of additional water sprays, water trucks etc Relocation or modification of dust-generating sources Record findings of investigations and actions taken to reduce dust levels Continue to closely monitor dust levels to ensure they are decreasing If elevated dust levels are due to regional dust event (fire, dust storm etc) – still take action to minimise dust from the Lots 2C and 2D site to minimise cumulative impacts, but also record details of the cause of the elevated background levels. 	 OWE Project Manager to review and investigate construction activities and respective control measures for the monitoring period, in an air pollution incident report. If it is concluded that construction activities at Lots 2C and 2D were directly responsible for the exceedance (ie the exceedance event was not caused due to high regional dust levels or local non-project dust source), Construction Contractor to submit an incident report to government agencies.



12 Roles and Responsibilities

Overall roles and responsibilities relating to the project are outlined in Section 3.2 of the overarching CEMP. The key responsibilities specifically for dust management are as follows:

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Contractor's Project Manager

- Ensuring appropriate resources/plant/personnel are available for the implementation of this CAQMP;
- Assessing data from inspections and providing project-wide advice to ensure consistent approach and outcomes are achieved;
- Providing necessary training for project personnel to cover air quality management;
- Reviewing and update of this CAQMP;
- Ensuring that the Environmental Coordinator monitors the PM₁₀ data being supplied by the onsite Senitex system, and any other dust monitoring systems identified as being required;
- Assessing and engaging (as required) additional mitigation controls to best manage the risks of elevated dust levels before commencing works each day and ensuring that the appropriate controls are implemented and effective;
- Reviewing weather forecasts daily and current observations of meteorological conditions (as recorded at Horsley Park AWS);
- Throughout the day, visually assessing the dust levels and the effectiveness of any dust controls that have been implemented, which may include engaging additional resources to reduce or mitigate the risk of dust leaving the site;
- Ceasing particular scopes of works as required in the event of excessive dust generation due to extreme
 weather conditions or inadequately controlled construction activities (eg high winds, surface dirt
 accumulation, etc.); and
- In the event that an air quality complaint is received, the procedure in Section 3.6 of the CEMP will be implemented (see **Section 9**).

Environmental Coordinator

- Undertaking dust monitoring program; and
- Review that control measures are working in accordance with the CAQMP.

All Workers on Site

- Observing any dust emission control instructions and procedures that apply to their work;
- Taking action to prevent or minimise dust emission incidents; and
- Identifying and reporting dust emission incidents.

13 Review and Improvement of the CAQMP

Reviews of the AQMP will be undertaken at least quarterly and will include participation by Goodman. The review will comprise, as a minimum, the following:

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- Identification of areas of opportunity for ongoing improved environmental performance;
- Analysis of the causes of any recorded non-compliances, including those identified in environment inspections and audits;
- Verification of the effectiveness of corrective and preventative actions; and
- Highlighting any changes in procedures resulting from process improvement.

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

- Where there is any change to the scope of the construction activities;
- Where it is identified that the environmental performance is not meeting the objectives of the AQMP;
- In the event of a substantiated complaint being received regarding air quality impacts; and/or
- At the request of a relevant regulatory authority.

14 References

ASON 2021, Oakdale West Industrial Estate – SSD 9794683, Stage 3 Development Application at Lots 2A, 2C and 2D, Ref P1518r01v6, dated: 1/11/2021.

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- DEC 2006, Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales, Department of Environment and Conservation NSW, December 2006.
- DPIE 2021, **NSW** Air Quality 2020, available Statement online at https://www.environment.nsw.gov.au/topics/air/nsw-air-quality-statements/annual-air-qualitystatement-2020, accessed 15 February 2021.
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APPENDIX A

WIND ROSES AND RAINFALL DATA ANALYSIS

Wind Conditions

Local wind speed and direction influence the dispersion of air pollutants. Wind speed determines both the distance of downwind transport and the rate of dilution as a result of 'plume' stretching. Wind direction, and the variability in wind direction, determines the general path pollutants will follow and the extent of crosswind spreading. Surface roughness (characterised by features such as the topography of the land and the presence of buildings, structures and trees) will also influence dispersion.

The Bureau of Meteorology (BoM) maintains and publishes data from weather stations across Australia. The closest such station recording wind speed and wind direction data is the Horsley Park Automatic Weather Station (AWS) (Station ID 67119), located approximately 5.5 kilometres (km) southeast of the Oakdale West. Considering the relatively flat terrain between Oakdale West and Horsley Park AWS, it is considered reasonable to assume that the wind conditions recorded at the Horsley Park AWS are representative of the wind conditions experienced at the Oakdale West.

Annual and seasonal wind roses for the years 2016 to 2020 compiled from data recorded by the Horsley Park AWS are presented in **Figure A1**. Wind roses show the frequency of occurrence of winds by direction and strength. The bars correspond to the 16 compass points (degrees from North). The bar at the top of each wind rose diagram represents winds <u>blowing from</u> the north (i.e. northerly winds), and so on. The length of the bar represents the frequency of occurrence of winds from that direction, and the widths of the bar sections correspond to wind speed categories, the narrowest representing the lightest winds. Thus it is possible to visualise how often winds of a certain direction and strength occur over a long period, either for all hours of the day, or for particular periods during the day.

The 'Beaufort Wind Scale' (consistent with terminology used by the BoM) presented in **Table A1** was used to describe the wind speeds experienced at Oakdale West.

Table A1 Beaufort Wind Scale

Beaufort Scale #	Description	m/s	Description on land
0	Calm	0-0.5	Smoke rises vertically
1	Light air	0.5-1.5	Smoke drift indicates wind direction
2-3	Light/gentle breeze	1.5-5.3	Wind felt on face, leaves rustle, light flags extended, ordinary vanes moved by wind
4	Moderate winds	5.3-8.0	Raises dust and loose paper, small branches are moved
5	Fresh winds	8.0-10.8	Small trees in leaf begin to sway, crested wavelets form on inland waters
6	Strong winds	>10.8	Large branches in motion, whistling heard in telephone wires; umbrellas used with difficulty

Source: http://www.bom.gov.au/lam/glossary/beaufort.shtml



The annual wind roses for the years 2016 to 2020 (**Figure A1**) indicate that predominant wind directions in the area are consistently from the southwest quadrant. Very low frequencies of winds from the north-eastern quadrant were recorded across all years. The annual frequency of calm wind conditions was recorded to be approximately 14% for all the years between 2016 and 2020. Also, a review of the annual wind roses (**Figure A1**) indicates that:

Winds that would blow fugitive dust emissions from the demolition/construction works towards the
nearest sensitive receptors located to the north and northwest of the proposed construction activities
occur approximately 15-20% of the time.

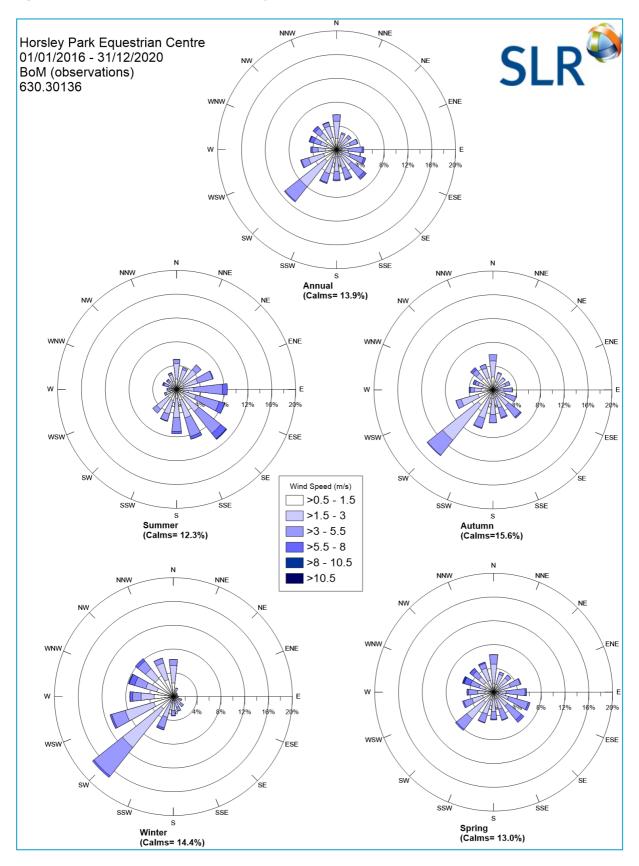
The seasonal wind roses for the years 2016 and 2020 (Figure A1) indicate that:

- In summer, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 9.8 m/s). The majority of winds originated from eastern and south eastern quadrants, with very few winds from western directions.
 Calm wind conditions were recorded approximately 12% of the time during summer.
- In autumn, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 8.9 m/s). The majority of winds originated from southwest quadrant, with very few winds from other directions. Calm wind conditions were observed to occur approximately 15% of the time during autumn.
- In winter, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 8.6 m/s). The majority of winds originated from southwest quadrant, with very few winds from other directions. Calm wind conditions were observed to occur approximately 13% of the time during winter.
- In spring, wind speeds ranged from calm to fresh winds (between 0.5 m/s and 9.8 m/s). The frequency of winds are generally even in each direction, except for a relatively low frequency of winds originating from southern quadrant. Calm wind conditions were observed to occur approximately 12% of the time during spring.

Wind erosion of dust from exposed surfaces (ie, during the construction phase of the development) is usually initiated when wind speeds exceed the threshold friction velocity for a given surface or material, however a general rule of thumb is that wind erosion can be expected to occur above 5 m/s (USEPA 2006). The frequency of wind speeds for the period of 2016-2020 is presented in **Figure A2**. The plot showed that the frequency of wind speeds exceeding 5 m/s for the period 2016-2020 at Horsley Park AWS was approximately 6%.



Figure A1 Annual Wind Roses for Horsley Park (2016 to 2020)



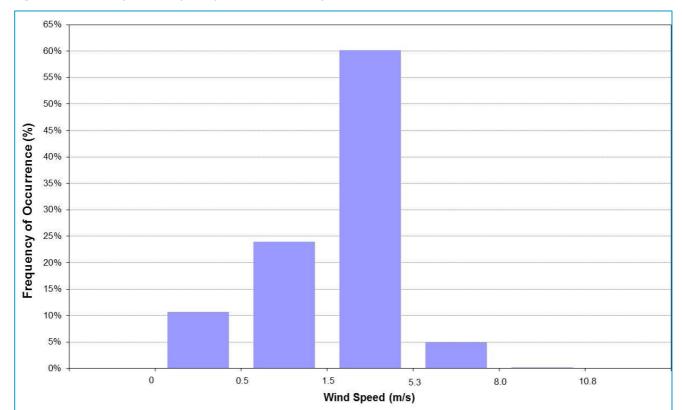


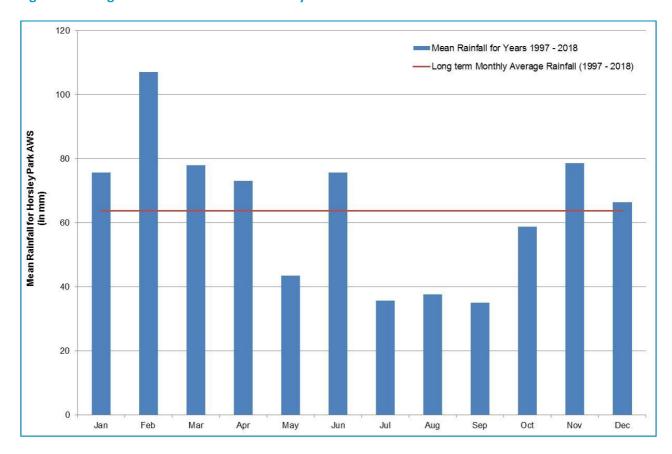
Figure A2 Wind Speed Frequency Chart for Horsley Park AWS – 2016-2020

Rainfall

Dry periods (no rainfall) have the greatest potential for fugitive dust emissions during construction. The long term monthly rainfall averages recorded at Horsley Park AWS rain gauge are shown in **Figure A4**. It is noted that generally rainfall is relatively low in mid-winter to mid spring periods. This rainfall pattern suggests that dust emissions from the demolition/construction activities at Oakdale West have the greatest potential to impact on receptors for the period of late autumn to early spring.



Figure A3 Long term Mean Rainfall for Horsley Park AWS – 1997 to 2018



APPENDIX B - CONSTRUCTION PHASE RISK ASSESSMENT METHODOLOGY

CONSTRUCTION PHASE RISK ASSESSMENT METHODOLOGY

Step 1 – Screening Based on Separation Distance

The Step 1 screening criteria provided by the IAQM guidance suggests screening out any assessment of impacts from construction activities where sensitive receptors are located more than 350 m from the boundary of the site, more than 50 m from the route used by construction vehicles on public roads and more than 500 m from the site entrance. This step is noted as having deliberately been chosen to be conservative and will require assessments for most projects.

The nearest sensitive receptor is located approximately 100 m from the nearest OWE boundary.

The screening criteria for detailed assessment are:

- a 'human receptor' within:
 - 350 m of the boundary of the site; or
 - 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).
- an 'ecological receptor' within:
 - 50 m of the boundary of the site; or
 - 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).

Sensitive receptors (residences) are located within 350 m of the OWE boundary, therefore further assessment is required.

Step 2a – Assessment of Scale and Nature of the Works

Step 2a of the assessment provides "dust emissions magnitudes" for each of four dust generating activities; demolition, earthworks, construction, and track-out (the movement of site material onto public roads by vehicles). The magnitudes are: *Large; Medium*; or *Small*, with suggested definitions for each category. The definitions given in the IAQM guidance for earthworks, construction activities and track-out, which are most relevant to this Development, are as follows:

Demolition (Any activity involved with the removal of an existing structure [or structures]. This may also be referred to as de-construction, specifically when a building is to be removed a small part at a time):

- *Large*: Total building volume >50,000 m³, potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >20 m above ground level;
- *Medium*: Total building volume 20,000 m³ 50,000 m³, potentially dusty construction material, demolition activities 10-20 m above ground level; and



APPENDIX B - CONSTRUCTION PHASE RISK ASSESSMENT METHODOLOGY

• **Small**: Total building volume <20,000 m³, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10m above ground, demolition during wetter months.

Earthworks (Covers the processes of soil-stripping, ground-levelling, excavation and landscaping):

- Large: Total site area greater than 10,000 m², potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), more than 10 heavy earth moving vehicles active at any one time, formation of bunds greater than 8 m in height, total material moved more than 100,000 t.
- **Medium**: Total site area 2,500 m² to 10,000 m², moderately dusty soil type (e.g. silt), 5 to 10 heavy earth moving vehicles active at any one time, formation of bunds 4 m to 8 m in height, total material moved 20,000 t to 100,000 t.
- **Small**: Total site area less than 2,500 m², soil type with large grain size (e.g. sand), less than five heavy earth moving vehicles active at any one time, formation of bunds less than 4 m in height, total material moved less than 20,000 t, earthworks during wetter months.

Construction (Any activity involved with the provision of a new structure (or structures), its modification or refurbishment. A structure will include a residential dwelling, office building, retail outlet, road, etc):

- Large: Total building volume greater than 100,000 m³, piling, on site concrete batching; sandblasting.
- **Medium**: Total building volume 25,000 m³ to 100,000 m³, potentially dusty construction material (e.g. concrete), piling, on site concrete batching.
- **Small**: Total building volume less than 25,000 m³, construction material with low potential for dust release (e.g. metal cladding or timber).

Track-out (The transport of dust and dirt from the construction / demolition site onto the public road network, where it may be deposited and then re-suspended by vehicles using the network):

- *Large*: More than 50 heavy vehicle movements per day, surface materials with a high potential for dust generation, greater than 100 m of unpaved road length.
- **Medium**: Between 10 and 50 heavy vehicle movements per day, surface materials with a moderate potential for dust generation, between 50 m and 100 m of unpaved road length.
- **Small**: Less than 10 heavy vehicle movements per day, surface materials with a low potential for dust generation, less than 50 m of unpaved road length.

In order to provide a conservative assessment of potential impacts, it has been assumed that if at least one of the parameters specified in the 'large' definition is satisfied, the works are classified as large, and so on.

Based on the above, dust emission magnitudes have been categorised as presented in Table B1.

Table B1 Categorisation of Dust Emission Magnitude

Activity	Dust Emission Magnitude	Basis
		IAQM Definition:
Demolition	Small	Total building volume <20,000 m³, construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10m above ground, demolition during wetter months.
		Relevance to this Project:
		Demolition activities will predominantly be limited to removal of any old structures (if any) within Lots 2C and 2D site boundary.
		IAQM Definition:
Earthworks	Large	Total site area greater than 10,000 m ² , potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), more than 10 heavy earth moving vehicles active at any one time, formation of bunds greater than 8 m in height, total material moved more than 100,000 t. Relevance to this Project:
		The footprint of Lots 2C and 2D is approximately 37,370 m ² and involves construction of two new buildings (total volume of approximately 235,000 m ³).
	Large	IAQM Definition:
		Total building volume greater than 100,000 m ³ , piling, on site concrete batching; sandblasting.
Construction		Relevance to this Project:
		The footprint of Lots 2C and 2D is approximately 37,370 m ² and involves construction of two new buildings (total volume of approximately 235,000 m ³).
		IAQM Definition:
Trackout	Medium	Between 10 and 50 heavy vehicle movements per day, surface materials with a moderate potential for dust generation, between 50 m and 100 m of unpaved road length.
		Relevance to this Project:
		The peak traffic volume during construction is estimated to be 27 vehicle movements per hour (See Section 3).

Step 2b - Risk Assessment

Assessment of the Sensitivity of the Area

Step 2b of the assessment process requires the sensitivity of the area to be defined. The sensitivity of the area takes into account:

- The specific sensitivities that identified sensitive receptors have to dust deposition and human health impacts;
- The proximity and number of those receptors;
- In the case of PM₁₀, the local background concentration; and
- Other site-specific factors, such as whether there are natural shelters such as trees to reduce the risk of wind-blown dust.

Individual receptors are classified as having *high*, *medium* or *low* sensitivity to dust deposition and human health impacts (ecological receptors are not addressed using this approach). The IAQM method provides guidance on the sensitivity of different receptor types to dust soiling and health effects as summarised in **Table B1**. It is noted that user expectations of amenity levels (dust soiling) is dependent on existing deposition levels.

Table B2 IAQM Guidance for Categorising Receptor Sensitivity

Value	High Sensitivity Receptor	Medium Sensitivity Receptor	Low Sensitivity Receptor
Dust soiling	Users can reasonably expect a high level of amenity; or The appearance, aesthetics or value of their property would be diminished by soiling, and the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods as part of the normal pattern of use of the land.	Users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or The appearance, aesthetics or value of their property could be diminished by soiling; or The people or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land.	The enjoyment of amenity would not reasonably be expected; or Property would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or There is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land.
	Examples: Dwellings, museums, medium and long term car parks and car showrooms.	Examples: Parks and places of work.	Examples: Playing fields, farmland (unless commerciallysensitive horticultural), footpaths, short term car parks and roads.
Health effects	Locations where the public are exposed over a time period relevant to the air quality objective for PM ₁₀ (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).	Locations where the people exposed are workers, and exposure is over a time period relevant to the air quality objective for PM ₁₀ (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).	Locations where human exposure is transient.
	Examples: Residential properties, hospitals, schools and residential care homes.	Examples: Office and shop workers, but will generally not include workers occupationally exposed to PM10.	Examples: Public footpaths, playing fields, parks and shopping street.

APPENDIX B - CONSTRUCTION PHASE RISK ASSESSMENT METHODOLOGY

According to the IAQM methods, the sensitivity of the identified individual receptors (as described above) is then used to assess the *sensitivity of the area* surrounding the active construction area, taking into account the proximity and number of those receptors, and the local background PM₁₀ concentration (in the case of potential health impacts) and other site-specific factors. Additional factors to consider when determining the sensitivity of the area include:

- any history of dust generating activities in the area;
- the likelihood of concurrent dust generating activity on nearby sites;
- any pre-existing screening between the source and the receptors;
- any conclusions drawn from analysing local meteorological data which accurately represent the area and if relevant, the season during which the works will take place;
- any conclusions drawn from local topography;
- the duration of the potential impact (as a receptor may be willing to accept elevated dust levels for a known short duration, or may become more sensitive or less sensitive (acclimatised) over time for long-term impacts); and
- any known specific receptor sensitivities which go beyond the classifications given in the IAQM document.

Based on the criteria listed in **Table B2**, the sensitivity of the identified receptors in this study is concluded to be <u>high</u> for health impacts and <u>high</u> for dust soiling, as they include residential areas where people may be reasonably expected to be present continuously as part of the normal pattern of land use.

The IAQM guidance for assessing the sensitivity of an area to dust soiling is shown in **Table B3**. The sensitivity of the area should be derived for each of activity relevant to the project (ie construction and earthworks).

Table B3 IAQM Guidance for Categorising the Sensitivity of an Area to Dust Soiling Effects

Receptor	Number of	Distance from the source (m)				
Sensitivity	receptors	<20	<50	<100	<350	
	>100	High	High	Medium	Low	
High	10-100		Medium	Low	Low	
	1-10	Medium	Low	Low	Low	
Medium	>1	Medium	Low	Low	Low	
Low	>1	Low	Low	Low	Low	

Note: Estimate the total number of receptors within the stated distance. Only the *highest level* of area sensitivity from the table needs to be considered. For example, if there are 7 high sensitivity receptors < 20m of the source and 95 high sensitivity receptors between 20 and 50 m, then the total of number of receptors < 50 m is 102. The sensitivity of the area in this case would be high.

A modified version of the IAQM guidance for assessing the *sensitivity of an area* to health impacts is shown in **Table B4**. For high sensitivity receptors, the IAQM methods takes the existing background concentrations of PM_{10} (as an annual average) experienced in the area of interest into account and is based on the air quality objectives for PM_{10} in the UK. As these objectives differ from the ambient air quality criteria adopted for use in this assessment (i.e. an annual average of 19.1 $\mu g/m^3$ for PM_{10}) the IAQM method has been modified slightly.

This approach is consistent with the IAQM guidance, which notes that in using the tables to define the *sensitivity* of an area, professional judgement may be used to determine alternative sensitivity categories, taking into account the following factors:

any history of dust generating activities in the area;

- the likelihood of concurrent dust generating activity on nearby sites;
- any pre-existing screening between the source and the receptors;
- any conclusions drawn from analysing local meteorological data which accurately represent the area, and
 if relevant the season during which the works will take place;
- any conclusions drawn from local topography;
- duration of the potential impact; and
- any known specific receptor sensitivities which go beyond the classifications given in this document.

Table B4 IAQM Guidance for Categorising the Sensitivity of an Area to Dust Health Effects

Receptor	Annual mean	Number of		Distanc	e from the sou	source (m)	
sensitivity	PM ₁₀ conc.	receptors ^{a,b}	<20	<50	<100	<200	<350
		>100	High	High	High	Medium	Low
	>25 μg/m³	10-100	High	High	Medium	Low	Low
		1-10	High	Medium	Low	Low	Low
		>100	High	High	Medium	Low	Low
	21-25 μg/m ³	10-100	High	Medium	Low	Low	Low
High		1-10	High	Medium	Low	Low	Low
nigii		>100	High	Medium	Low	Low	Low
	17-21 μg/m³	10-100	High	Medium	Low	Low	Low
		1-10	Medium	Low	Low	Low	Low
	<17 μg/m³	>100	Medium	Low	Low	Low	Low
		10-100	Low	Low	Low	Low	Low
		1-10	Low	Low	Low	Low	Low
	>25 ug/m ³	>10	High	Medium	Low	Low	Low
	>25 μg/m ³	1-10	Medium	Low	Low	Low	Low
		>10	Medium	Low	Low	Low	Low
Medium	21-25 μg/m ³	1-10	Low	Low	Low	Low	Low
iviedium	17 21 / 3	>10	Low	Low	Low	Low	Low
	17-21 μg/m³	1-10	Low	Low	Low	Low	Low
	<17 ug/m³	>10	Low	Low	Low	Low	Low
	<17 μg/m ³	1-10	Low	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low	Low

Notes:

⁽b) In the case of high sensitivity receptors with high occupancy (such as schools or hospitals) approximate the number of people likely to be present. In the case of residential dwellings, just include the number of properties.



⁽a) Estimate the total within the stated distance (e.g. the total within 350 m and not the number between 200 and 350 m); noting that only the highest level of area sensitivity from the table needs to be considered.

APPENDIX B - CONSTRUCTION PHASE RISK ASSESSMENT METHODOLOGY

The nearest sensitive receptor is located within 350 m from the nearest OWE boundary. Based on the classifications shown in **Table B3** and **Table B4**, the sensitivity of the area to dust soiling and to health effects may both be classified as '<u>low</u>'. This categorisation has been made considering the individual receptor sensitivities derived above, the annual mean background PM₁₀ concentration of 19.4 μ g/m³ recorded at St Marys AQMS (see **Section 6.2**) and the anticipated number of sensitive receptors present in the vicinity of the OWE.

Risk Assessment

The dust emission magnitude from Step 2a and the receptor sensitivity from Step 2b are then used in the matrices shown in **Table B5** (earthworks and construction), **Table B6** (track-out) and **Table B7** (demolition) to determine the risk category with no mitigation applied.

Table B5 Risk Category from Earthworks and Construction Activities

Consistivity of Area	Dust Emission Magnitude				
Sensitivity of Area	Large	Medium	Small		
High	High Risk	Medium Risk	Low Risk		
Medium	Medium Risk	Medium Risk	Low Risk		
Low	Low Risk	Low Risk	Negligible		

Table B6 Risk Category from Track-out Activities

Consistivity of Aron	Dust Emission Magnitude			
Sensitivity of Area	Large	Medium	Small	
High	High Risk	Medium Risk	Low Risk	
Medium	Medium Risk	Low Risk	Negligible	
Low	Low Risk	Low Risk	Negligible	

Table B7 Risk Category from Demolition Activities

Sensitivity of Area	Dust Emission Magnitude			
Sensitivity of Area	Large	Medium	Small	
High	High Risk	Medium Risk	Medium Risk	
Medium	High Risk	Medium Risk	Low Risk	
Low	Medium Risk	Low Risk	Negligible	

APPENDIX C

AIR QUALITY NOTIFICATION FORM



APPENDIX D - CURRICULUM VITAE OF AUTHOR

CURRICULUM VITAE



VARUN MARWAHA

ASSOCIATE

Air Quality, Asia-Pacific

QUALIFICATIONS

BEng

2006

Bachelor of Engineering - Chemical, University of Sydney

EXPERTISE

- Air Quality Dispersion modelling using a variety of software applications
- Meteorological and Ambient air quality monitoring & assessment for legislative compliance
- Australian state and federal regulatory compliance – Air Quality
- Opportunities and constraints reporting
- Detailed knowledge of air quality/meteorological interactions

Varun is an Associate Air Quality Consultant working within the Air Quality team. He has over 10 years of environmental and process engineering experience.

Varun has acquired a broad environmental experience including air quality (including odour) impact assessments, emission inventories (including National Pollutant Inventory), air quality dispersion modelling (including Ausplume, CALPUFF and CAL3QHCR), air quality monitoring (including odour), meteorological monitoring, meteorological modelling (The Air Pollution Model [TAPM] & CALMET), greenhouse gas assessments and overall project management.

Varun has conducted numerous environmental audits and prepared NPI reports for a range of industries including power stations throughout Australia.

Varun is a Certified Air Quality Professional (CAQP) and a Certified Practicing Project Manager (CPPM), and is respected for his contribution to the air quality industry.

PROJECTS

Sentosa Gateway Project, Singapore The project involved the assessment of air impacts due to road traffic tunnel from Sentosa Island to mainland Singapore. The project proposed to build a tunnel for the outbound traffic from Sentosa with tunnel exits located on Lower Delta Road and Keppel Road. The emissions were quantified and modelled using CAL3QHCR and CALPUFF modelling suites to predict the roadside impacts. The project also included assessment of other sources of pollutants in the region for the cumulative assessment

Sydney Harbour Bridge, Sydney, NSW, Australia Compliance Monitoring (Lead, PM_{10} and TSP). The project involves repainting the iconic Sydney Harbour Bridge. The process includes stripping the old paint (containing lead), preparation of the surface and repainting. The monitoring was conducted for lead concentration in the air along with the concentration of particulate (PM_{10} and TSP) was required. For lead monitoring, membrane filters were used and for particulate monitoring High Volume air samplers (HVAS) were employed.

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CURRICULUM VITAE

VARUN MARWAHA

Capital Metro Project, Canberra, ACT, Australia (2018-2019)	The project involved preparation of Air Quality Impact Assessment (AQIA) for the proposed ACT Light Rail Stage 1 – Gungahlin to Civic Project, a 12 kilometre light rail service linking the fast- developing area of Gungahlin in the north, to the City. The emissions due to the operation of light rail network were quantified and compared to the existing regional air emissions levels. It was demonstrated that the regional emissions were likely to decrease significantly when compared with the current situation.			
Proposed Residential Development, RMS	Road Traffic Impact Assessment. The project involved assessment of roadside impacts on the proposed residential development due to road traffic on a busy motorway. The aim of the project was to determine the maximum impacts and validating against the monitored roadside data. The emissions were quantified and modelled using CAL3QHCR modelling suite to predict the roadside impacts. The project also included assessment of other sources of pollutants in the region for the cumulative assessment. The modelling skills were put to test when integrating predicted results from several modelling suites (CAL3QHCR and CALPUFF)			
Proposed Haul Roads (Fortescue Metals Group), WA, Australia	The project involved assessment of two possible options for building haul roads in separate directions. The aim of the project was to determine mine access route from the nearest transport facility. The emissions were quantified and modelled using CALPUFF modelling suite to predict the roadside impacts on the nearest receptors on each haul road route.			
Confidential Highway Project, QLD, Australia	Emissions estimation and modelling for an air quality impact assessment for a proposed new highway in Queensland. Work included the estimation of vehicle emissions for the operational phase using the COPERT-Australia emissions modelling software and dispersion modelling of the road and tunnel emissions using CAL3QHCR and CALPUFF dispersion models.			
	Clean Air Society of Australia and New Zealand (CASANZ)			
MEMBERSHIPS	Member of Engineers Australia (EA)			
	Institute of Chemical Engineers (IChemE)			
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	Advanced CALPUFF Course — Clean Air Society of Australia and New Zealand (CASANZ), 2008			
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APPENDIX I

Construction Traffic Management Plan



Construction Traffic Management Plan

Lot 2C & 2D, Oakdale West Estate

Oakdale West Estate, Kemps Creek 10/10/20222 P1518r03v2



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Document Control

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Project	Lot 2C & 2D - Construction Traffic Management Plan
Client	Goodman Property Services (Aust) Pty. Limited
File Reference	P1518r03v2 CC CTMP_Lot 2C & 2D, Oakdale West Industrial Estate

Revision History

Revision No.	Date	Details	Author	Approved by
-	16/03/2022	Draft	J. Wong	J. Laidler
Issue I	30/03/2022	Issue I	J. Laidler	J. Laidler
Issue II	10/10/2022	Issue II	J. Laidler	J. Laidler

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Appendix A. Traffic Guidance Scheme

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Glossary

Acronym	Description
AGRD	Austroads Guide to Road Design
AGTM	Austroads Guide to Traffic Management
CC	Construction Certificate
Council	Penrith City Council
DA	Development Application
DCP	Development Control Plan
DoS	Degree of Saturation
DPIE	Department of Planning, Industry and Environment
FSR	Floor space ratio
GFA	Gross Floor Area
HRV	Heavy Rigid Vehicle (as defined by AS2890.2:2018)
LEP	Local Environmental Plan
LGA	Local Government Area
LoS	Level of Service
MOD	Section 4.55 Modification (also referred as a S4.55)
MRV	Medium Rigid Vehicle (as defined by AS2890.2:2018)
NHVR	National Heavy Vehicle Regulator
OC	Occupation Certificate
RMS Guide	Transport for NSW (formerly Roads and Traffic Authority), Guide to Traffic Generating Developments, 2002
S4.55	Section 4.55 Modification (also referenced as MOD)
S96	Section 96 Modification (former process terminology for an S4.55)
SRV	Small Rigid Vehicle (as defined by AS2890.2:2018)
TDT 2013/04a	TfNSW Technical Direction, Guide to Traffic Generating Developments – Updated traffic surveys, August 2013
TfNSW	Transport for New South Wales
TGS	Traffic Guidance Scheme
TIA	Transport Impact Assessment
TIS	Transport Impact Statement
veh/hr	Vehicle movements per hour (1 vehicle in & out = 2 movements)



1 Introduction

1.1 Overview

Ason Group has been engaged by Goodman Property Services (Aust) Pty. Limited (Goodman) to prepare a Construction Traffic Management Plan (CTMP) relating to the construction of Lot 2C & 2D within the Oakdale West Industrial Estate (OWE) at Kemps Creek (the Site). A site plan and an overview of the proposed surroundings are provided in **Figure 1**.

SSD 9794683 was approved on 16 December 2021, and as such the CEMP has been prepared accordingly.

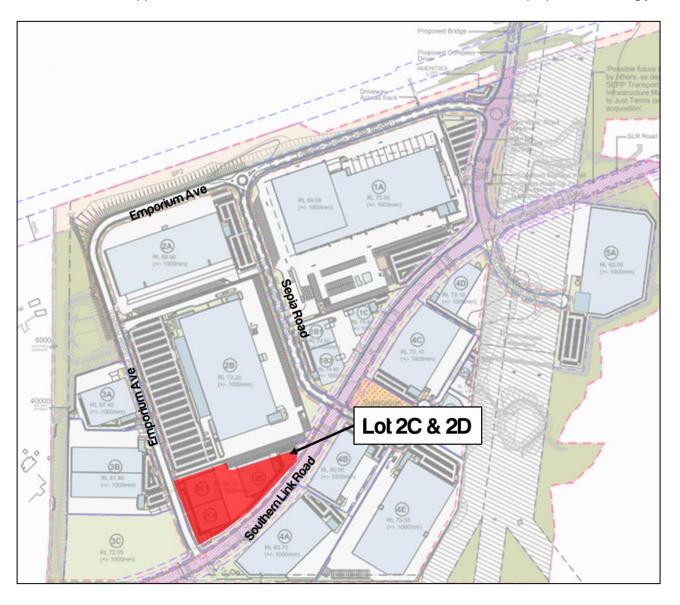


Figure 1: OWE Context Showing Lot 2C & 2D

1.2 Report Purpose

The purpose of this report is to detail a traffic management plan for construction that seeks:

- To minimise traffic impacts on the surrounding road network and adjacent landowners / occupiers,
- Ensure safety of workers, pedestrians, road users and any site-specific considerations (including schools and neighbours to the west),
- Provide appropriate warnings of changes in road / traffic conditions, and of personnel / workers and plant engaged in the works on or adjacent to roads accessible to the general public.
- Minimise disruptions to public transport.
- Provide information regarding the construction vehicle access routes and any changed road conditions (if applicable); and
- Communicate the arrangements for and impacts of any activities affecting traffic.

It is expected that this plan will be updated should any necessary changes to the currently proposed arrangements arise in the future. Any special events (if required) would be subject to a separate request for a specific permit not covered by this report.

Ason Group is responsible for the preparation of this Plan only and not for its implementation, which is the responsibility of the Contractor.

This report has been prepared by consultants who hold the TfNSW (formerly RMS) Prepare a Work Zone Traffic Management Plan certification. Details of the accredited personnel are provided below:

Dora Choi SafeWork NSW No. TCT0021456James Laidler SafeWork NSW No. TCT0031686

In accordance with Condition B2 of the consent, no works can commence until a CTMP report is approved by the Planning Secretary of the Department of Planning, Industry & Environment.

1.3 Site Context

There are existing works associated with the construction of Compass Drive and the OWE. For context, the works are generally summarised as follows:

- OWE is a staged development for warehousing and distribution hub. Stage 1 of the OWE (the proposed works) comprises estate wide earthworks and construction of road infrastructure in preparation of the construction of warehouses, however it currently excludes the actual construction of any warehouses.
- Compass Drive has been constructed as part of a State Significant Development. Compass Drive
 provides a connection between Lenore Drive and the future Southern Link Road (SLR). In the short-term
 Compass Drive will be a public road, owned by Council, providing local access to the future Oakdale
 West Estate and other industrial areas north of the Water NSW Pipeline.

Each of the above has been subject to a separate Construction Traffic Management Plan — versions referenced in preparing this CTMP:

- Ason Group, Construction Traffic Management Plan, Oakdale West Estate, Kemps Creek, 0129r06v19 CTMP_ Oakdale West Estate, Kemps Creek Issue IX, 06/04/2020
- Ason Group, Construction Traffic Management Plan, WNSLR, Erskine Park (Western North South Link Road), 0605r01v5 CTMP_WNSLR, Erskine Park, 12/09/2019



Ason Group, SSD TA_Lots 2A, 2C & 2D, Oakdale West Estate, P1518r01v6, dated 24/06/2021

The original SSD approval for the OWE (SSD 7348) was granted on 13 September 2019 and envisaged a total GFA of some 475,269 m2 GFA (original approved GFA) across the entire Estate spanning 5 precincts. Since that approval, the Estate has gone through several modifications with the latest approval being granted for MOD 9.

For context, the Approved Oakdale West Estate (MOD 9) will generate the following peak hourly traffic volumes associated with future operation of the Estate.

AM peak 1,326 veh/hr. PM peak 1,029 veh/hr Daily 11,249 veh/day

SSD 9794683 Requirements

The following SSD conditions have been received with respect to construction traffic management specific for Building 2C1, 2C2 & 2D.

TABLE 1: EXPECTED COMPLIANCE TABLE

Reference	SSD Condition Requirement	Response
B1	Prior to the commencement of construction of the development, the Applicant must prepare a Construction Traffic Management Plan for the development to the satisfaction of the Planning Secretary. The plan must form part of the CEMP required by condition C2 and must:	-
a)	be prepared by a suitably qualified and experienced person(s)	Consultants from Ason Group are suitably qualified Traffic Engineers, with relevant "Prepare a Work Zone Traffic Management Plan" accreditation.
b)	detail the measures to be implemented to ensure road safety and network efficiency during construction,	Refer Section 6.2 with regard to impacts to traffic efficiency. This section concludes that construction traffic can be satisfactorily mitigated to not have a material impact on the road network.
		Furthermore, Traffic Guidance Schemes (TGSs) shall be developed for all works that impact public roads and approved by the Transport for NSW (TfNSW) Traffic Management Centre.
		As noted in previous Reference items above, there shall be no limitations to timed deliveries other than being within the approved construction hours (outlined within Section 2.2
c)	detail heavy vehicle routes, access and parking arrangements;	The site access arrangements – relevant to each stage - are outlined in subsequent sections of this report (Refer Section 3).



d)	include a Driver Code of Conduct (see Condition B12)	A Driver Code of Conduct is a requirement of and included within this CTMP. The Driver Code of Conduct (included in Section 5) addresses ways to minimise the impacts on the road network, with other road users, ensure truck routes are utilised and to manage pedestrian movements.
e)	include a program to monitor the effectiveness of these measures; and	The Contractor / Owner of Estate shall include a program to monitor the effectiveness of the measures. Deliveries will be tracked against approved volumes and will keep a vehicle log - including rego & time of entry - for the purpose of assessing the effectiveness of these monitoring programs. These programs will be completed in accordance with Section 7.
f)	If necessary, detail procedures for notifying residents and the community (including local schools), of any potential disruptions to routes.	The Contractor will notify the community liaison representative (SLR) when traffic conditions are expected to exceed parameters within Condition Green of Table 7. Measures that may be included within the strategy have been identified within Section 7.2
B2	The Applicant must:	-
a)	not commence construction until the Construction Traffic Management Plan required by condition B1 is approved by the Planning Secretary; and	Noted and reiterated in Section 1.2
b)	implement the most recent version of the Construction Traffic Management Plan approved by the Planning Secretary for the duration of construction.	Noted
B12	Prior to the commencement of construction of the development, the Applicant must prepare a Driver Code of Conduct and induction training for the development to minimise road traffic noise. The Applicant must update the Driver Code of Conduct and induction training for construction and operation and must implement the Code of Conduct for the life of the development.	A Driver Code of Conduct is a requirement of and included within this CTMP. The Driver Code of Conduct (included in Section 5) addresses ways to minimise the impacts on the road network, with other road users, ensure truck routes are utilised and to manage pedestrian movements.
C1	Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:	-
a)	details of: i) the relevant statutory requirements (including any relevant approval, licence, or lease conditions). ii) any relevant limits or performance measures and criteria; and iii) the specific performance indicators that	Relevant requirements are outlined in this table. Other specific requirements are detailed in Section 4
	are proposed to be used to judge the performance of, or guide the	



	implementation of, the development or any management measures;	
b)	a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	Refer to Section 7
c)	program to monitor and report on the: i) impacts and environmental performance of the development; and ii) effectiveness of the management measures set out pursuant to paragraph (c) above;	Refer Section 7.1 of this Plan which outlines the requirement for this Plan to be updated regularly.
d)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Refer Section 7.1 of this Plan which outlines the requirement for this Plan to be updated regularly. TGS's — outlined in Section 4.2.9 shall be prepared to respond to specific work situations and subject to approval by the relevant Roads Authority (Council and/or TfNSW), providing a suitable level of independent oversight.
e)	a program to investigate and implement ways to improve the environmental performance of the development over time	Refer Section 7.1of this Plan which outlines the requirement for this Plan to be updated regularly.
f)	 a protocol for managing and reporting any: (i) incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria). (ii) complaint. (iii) failure to comply with statutory requirements; and 	Management and reporting protocols are outlined in the Construction Environmental Management Plan. Reference is also made to Section 5.5 of this Plan in relation to incident management.
g)	a protocol for periodic review of the plan.	Refer Section 7.1 of this Plan.

1.5 Site Location

At a regional level, the Site is located approximately 3 kilometres south of the nearest suburban area, Erskine Park, 18 kilometres west of Parramatta, and 37 kilometres west of the Sydney CBD. It is within the Local Government Area (LGA) of Penrith City Council.

Within the context of the OWE, Lot 2C & 2D is located on the eastern boundary of Emporium Avenue and the northern boundary of the future Southern Link Road, with a total site area of 37,370 m².

1.6 Road Hierarchy

The road hierarchy in the locality is presented in Figure 2 and summarised below for key roads.



1.6.1 Lenore Drive / Old Wallgrove Road

Lenore Drive is a recently upgraded sub-arterial route providing an east-west connection linking Old Wallgrove Road (OWR) to the east and Erskine Park Road to the west. It provides four lanes (two in each direction) within a divided carriageway with a shared path along the northern side of the road. It is subject to an 80 km/h speed zoning.

1.6.2 Compass Drive

Compass Drive is a high-capacity road and is part of a State Significant Development. Compass Drive provides a connection between Lenore Drive and the future Southern Link Road (SLR). In the short-term Compass Drive will be a public road, owned by Council, providing local access to the future Oakdale West Estate and other industrial areas north of the Water NSW Pipeline. It has a signalised intersection at both ends of Lockwood Drive and will be a four-lane dual carriageway arterial road with a speed limit of 60km/hr.

1.6.3 Emporium Avenue

Emporium Avenue has been recently dedicated to Council and therefore is considered a public road. Emporium Ave provides access to Precinct 1 and Precinct 2 and links the Future Southern Link Road (SLR) to Compass Drive. It provides a single lane in each direction and has a posted speed limit of 50km/h.

1.6.4 Sepia Road (Formally Topaz Avenue)

Sepia Road has been recently dedicated to Council and therefore is considered a public road. Sepia Road separates Precinct 1 and Precinct 2 and connects to the Future Southern Link Road (SLR). It provides a single lane in each direction and has a posted speed limit of 50km/h.



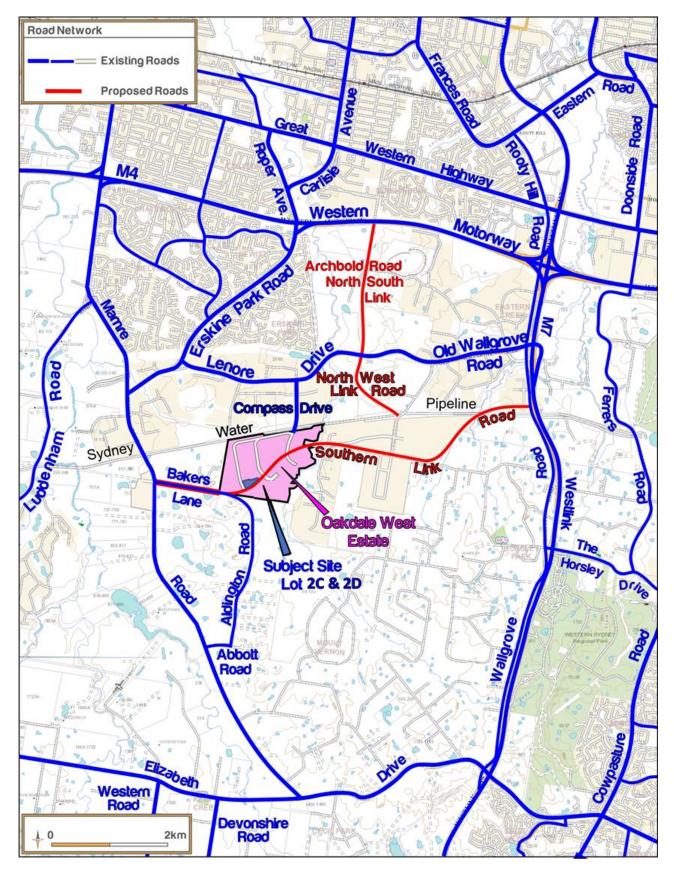


Figure 2: Road Hierarchy

1.7 Project Representatives and Stakeholders

Through the preparation of this CTMP, the project representatives and stakeholders for this project are as follows.

- Goodman Property Services (Aust)
 - Stephanie Partridge (Senior Development Manager)
 - Guy Smith (Planning Manager)
 - Ben Milner (Senior Project Manager)
 - Luke Ridley (Project Manager)
 - Lachlan O'Reilly (Project Administrator)
 - Claudia Wheatley (Project Administrator)
- Ason Group
 - Ali Rasouli (Principal Traffic Engineer)
 - Dora Choi (Principal Lead: Traffic Management & Operations)
 - James Laidler (Senior Traffic Engineer)
 - Jasmine Wong (Graduate Traffic Engineer)



2 Overview of Works

2.1 Works Stages

For the purposes of this CTMP, these works will utilise Compass Drive. The access and traffic management required is outlined later within this report. Recognising the purpose of this CTMP, it is estimated that the total duration of the construction works will be approximately 36 weeks from the commencement date. The following summarises key aspects of the construction stages:

2.1.1 Stage 1 – Excavation and Enabling Works

TABLE 2: STAGE SUMMARY - STAGE 1 Criteria Response Description of Key Activities General earthworks, Construction of the temporary accesses, and **Enabling works** Stage Length 6 weeks Max. Vehicle Size 20.0m Articulated Vehicles (Special Permits may be required for floating in plant) Vehicle Movement Frequency Approximately 60 light vehicle movements / day Approximately 30 heavy vehicle movements / day All vehicles shall access via Compass Drive Truck Access Requirements Υ Vehicle access / egress in a forward direction (Y / Out of Hours Deliveries (Y/N) Y – upon written approval by the Planning Secretary Contractor Parking Y – Location varies depending on discreet work area(s). Builder shall nominate contactor parking zones, clear of truck manoeuvring areas. Pedestrian Control Wire mesh site boundary fencing and Type A hoarding **Public Transport Services Affected** Nil Road Occupancy Requirements Ν (If yes, provide further details) Lane or Footpath Closures Ν

Refer below.



(If yes, provide further details)

Traffic Guidance Scheme

TABLE 3: STAGE SUMMARY – STAGE 2

Criteria	Response
Description of Key Activities	Construction of Warehouse and other structures within Site.
Stage Length	4 weeks
Max. Vehicle Size	20.0m Articulated Vehicles (Special Permits may be required for floating in plant)
Vehicle Movement Frequency	Approximately 100 light vehicle movements / day + Approximately 60 heavy vehicle movements / day
Truck Access Requirements	All vehicles shall access via Compass Drive
Vehicle access / egress in a forward direction (Y / N)	Υ
Out of Hours Deliveries (Y/N)	Y – upon written approval by the Planning Secretary
Contractor Parking	Y – Location varies depending on discreet work area(s). Builder shall nominate contactor parking zones, clear of truck manoeuvring areas.
Pedestrian Control	Wire mesh site boundary fencing.
Public Transport Services Affected	Nil
Road Occupancy Requirements (If yes, provide further details)	N
Lane or Footpath Closures (If yes, provide further details)	N
Traffic Guidance Scheme	Refer below.

TABLE 4: STAGE SUMMARY – STAGE 3

Criteria	Response
Description of Key Activities	Construction of warehouse internal base concrete slab
Stage Length	17 weeks
Max. Vehicle Size	20.0m Articulated Vehicles
Vehicle Movement Frequency	Approximately 100 light vehicle movements / day +
	Approximately 60 heavy vehicle movements / day
Truck Access Requirements	All vehicles shall access via Compass Drive
Vehicle access / egress in a forward direction (Y / N)	Y
Out of Hours Deliveries (Y/N)	Y – upon written approval by the Planning Secretary
Contractor Parking	Y – Location varies depending on discreet work area(s). Builder shall nominate contactor parking zones, clear of truck manoeuvring areas.
Pedestrian Control	Wire mesh site boundary fencing.
Public Transport Services Affected	Nil
Road Occupancy Requirements (If yes, provide further details)	N
Lane or Footpath Closures (If yes, provide further details)	N
Traffic Guidance Scheme	Refer below.

TABLE 5: STAGE SUMMARY - STAGE 4

Criteria	Response
Description of Key Activities	Construction of hardstand, car park and landscaping works
Stage Length	9 weeks
Max. Vehicle Size	20.0m Articulated Vehicles
Vehicle Movement Frequency	Approximately 120 light vehicle movements / day + Approximately 60 heavy vehicle movements / day
Truck Access Requirements	All vehicles shall access via Compass Drive
Vehicle access / egress in a forward direction (Y / N)	Y
Out of Hours Deliveries (Y/N)	Y – upon written approval by the Planning Secretary
Contractor Parking	Y – Location varies depending on discreet work area(s). Builder shall nominate contactor parking zones, clear of truck manoeuvring areas.
Pedestrian Control	Wire mesh site boundary fencing.
Public Transport Services Affected	Nil
Road Occupancy Requirements (If yes, provide further details)	N
Lane or Footpath Closures (If yes, provide further details)	N
Traffic Guidance Scheme	Refer below.

2.2 Hours of Work

Having regard for the expected Conditions of Consent, the permitted hours of works are as follows:

During Construction:

7:00AM - 6:00PM Monday - Friday.

8:00AM - 1:00PM Saturday

Work outside these hours may be undertaken (with prior consent) under the following conditions:

- works that are inaudible at the nearest sensitive receivers.
- works agreed to in writing by the Planning Secretary.
- for the delivery of materials required outside these hours by the NSW Police Force or other authorities for safety reasons; or
- where it is required in an emergency to avoid the loss of lives, property or to prevent environmental harm.



2.3 Access Arrangements

Emergency vehicle access to and from the Site will be available at all times while the site is occupied by construction activities. This process would be implemented through emergency protocols on the site which will be developed by the Contractor and shall be documented within the Contractor's Construction Management Plan.

This is discussed in further detail below. At no stage will vehicles utilise Bakers Lane to access the Site.



3 Existing Conditions

3.1 Site Access

Access to the site shall be available via Compass Drive, the Link Road, and Emporium Ave and Sepia Rd, as shown below.

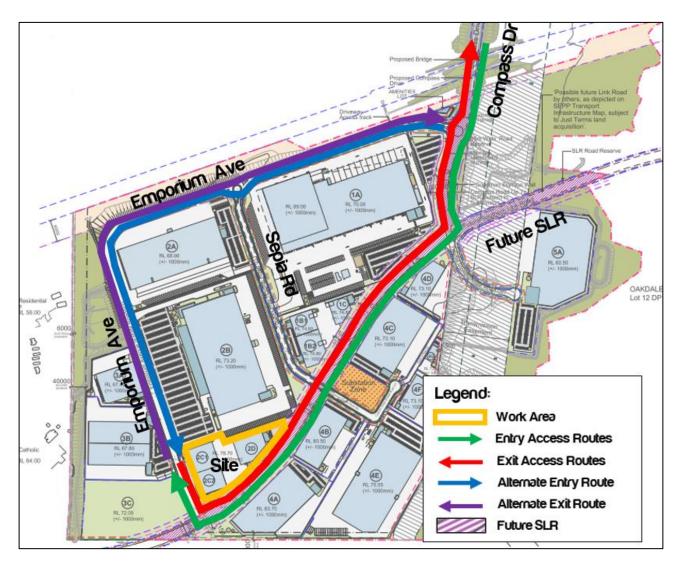


Figure 3: Access Arrangements

3.2 Active Transport Connections

A Shared Path (cyclists and pedestrians) is provided along the northern side of Lenore Drive and western side of Old Wallgrove Road, providing connections to the regional pedestrian and cycle networks. Compass Drive and the internal roads will include a 2.5-metre shared path for both pedestrians and cyclists.

Footpaths and cycle routes do not carry high volumes of pedestrians or cyclists. Notwithstanding, any TGS shall maintain a suitable level of access past work areas for these users at all times.



3.3 Public Transport Services

The introduction of a new bus route is confirmed to provide additional access for workers/ visitors within OWE. This new bus service commenced from 24 October 2021 and will provide direct access to and from St Marys Train Station. This introduction of a direct connection with St Marys Train Station increases the accessibility of the site via public transport services.

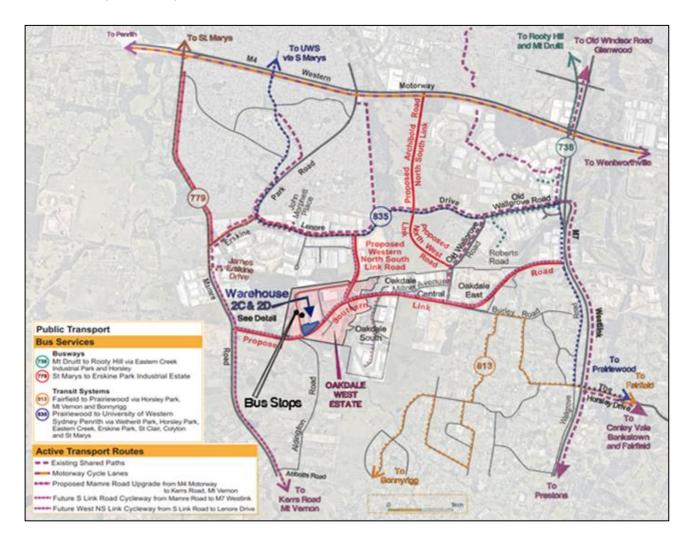


Figure 4: Existing Public Transport and Cycle Links

4 Management Plan

4.1 Traffic Movements

4.1.1 Background

The traffic report (Ason Group Ref: 1518r01v6) supporting the Lot 2C & 2D submission, outlined the following relevant figures with regards to future operational traffic volumes associated with the Site:

AM Peak 27 movements per hour (movements, in & out combined)
 PM Peak 27 movements per hour (movements, in & out combined)
 Daily Total 318 daily movements (movements, in & out combined)

For the purpose of this report, 1 truck is equal to 1 inbound movement plus 1 outbound movement which equals to a total of 2 movements.

4.1.2 Current Construction Traffic Estimates

The anticipated vehicle movements generated by the construction of the Site have been estimated having consideration of the likely requirements for construction staff, plant, equipment, and haulage. The anticipated construction schedule has been provided by the contractor, with the estimated traffic volumes are as follows:

 Lot 2C & 2D Construction Works – up to 120 light vehicle movements per day and 60 heavy vehicle movements per day (including truck and dog and 3 tonne rigid trucks) shall access the Site, although not in the same time period per day. Notwithstanding the estimated maximum daily construction vehicle generation is up to 180 vehicle movements per day.

For reference, the definitions of light and heavy vehicles are as follows.

- Light Vehicles: For the purpose of this report a light vehicle is a car, ute, or four-wheel drive that relates to the construction works of the site.
- Heavy Vehicle: For the purpose of this report, a heavy vehicle ranges from (but is not limited to) a 12.5m Heavy Rigid Vehicle (HRV) up to a 26.0m B-Double that relates to the construction works of the site.

For reference, a construction vehicle would relate to all contracted parties involved in day-to-day construction activities on site. This would include.

- All Vehicles making material deliveries to and from the Site.
- All Contractors and their sub-contractor's construction site vehicles
- All construction staff working on the projects arriving / departing the Site in private cars.

In turn, the following are exempt from the requirements of the CTMP (as they are not part of construction works within the Site).

- All Goodman staff and their design / management consultants
- Food vans / food deliveries by non-contracted parties
- Relevant Authorities / Agencies (including DPIE or Penrith City Council/, and other stakeholders including Endeavour Energy, TransGrid, Sydney Water, NBN or others who have assets on the site)



Members of the public who may drive in ad hoc.

4.1.3 Truck Movements & Contractor Parking

The construction access is from Compass Drive via the Southern Link Road, and Emporium Avenue. Relevant truck routes are outlined within Figure 3. The implementation of the access route shall be done so in accordance with any and all conditions of consent received from Council and/or TfNSW.

It is expected that a schedule for deliveries of materials and goods will be established prior to that day, with Traffic Controllers maintaining radio contact with construction vehicles at all times. Thus, at no stage shall queueing occur on the public road network. In the event that vehicles were required to use a layover prior to arrival to site, it is expected that the vehicles shall laydown within Compass Drive before arriving to site in order to avoid any on-street queuing.

It is expected that future contractors shall prepare Vehicle Movement Plans (VMP) for on-site circulation for key stages generating more than 60 truck movements (30 in, 30 out) per day.

In preparing relevant details VMPs, the contractor should:

- Minimise interaction with other work areas, as far as possible.
- Where possible, separate truck movements from contractor car parking areas
- Prepare Traffic Control Plans where necessary to provide additional management of on-site vehicle movements.

It should be noted that TfNSW is yet to complete detailed design of the SLR. As such, it is unlikely that SLR works will commence during the timeframes envisaged by this CTMP. Nevertheless, regular engagement with TfNSW should be undertaken to coordinate any final design and/or construction access requirements.

4.1.4 TransGrid Easement

A TransGrid easement runs to the east of the Work Area which is subject to a number of restrictions. Whilst contractors associated with the subject works are not likely to impact this area, it is important to note that no vehicle circulation is permitted within 5 metres of any transmission structure or quywires unless otherwise pre-arranged. All endeavours shall be undertaken to limit vehicular movements with the easement areas for all construction works, wherever practicable.



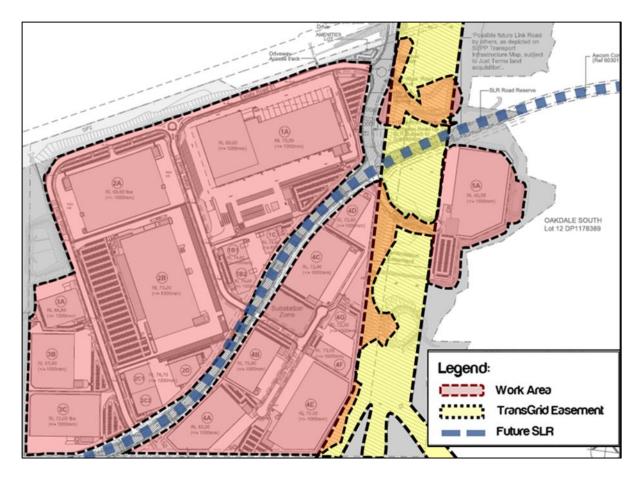


Figure 5: TransGrid Easement Within the Estate

Other General Requirements 4.2

4.2.1 **Driver Code of Conduct**

All drivers shall adhere to the Driver Code of Conduct, outlined in Section 5.

4.2.2 Contractor Parking

Contactors shall nominate the parking zones without obstructing any vehicle manoeuvre routes. The location of Contractor parking areas are expected to change as construction continues and encompasses various portions of the Site.

4.2.3 Access Road Management

Vehicles shall be tracked upon entry and exit of the Site's access to ensure that vehicles are abiding by both the timed restrictions and construction volume constraints.



4.2.4 Loading & Materials Handling

Handling of all materials throughout the construction shall adhere to the following.

- It is proposed that all material loading will occur within the construction site boundary.
- No loading is proposed to occur outside of the provisioned areas.
- Equipment, materials, and waste will be kept within the construction site boundary.

During latter stages of construction, tie in works will be required within the kerbside of Emporium Ave and Sepia Road. All materials handling shall be undertaken off the public roadway, however in the event materials handling are required from the roadway, then prior approval shall be sought and obtained from the relevant Authorities. Noting that Estate Roads are currently in private ownership, this would require consent of the Estate Management and be subject to special management.

4.2.5 Work Zone Requirements

An on-street Works Zone is proposed for the use of hydrant fill points by Contractor water carts. The locations will be confirmed by the builder at a later date, and subject to approval by PCC prior to any filling.

A separate application to Council will therefore be required in the event that any special or discreet work activities do require the use of kerbside parking for the purposes of a Works Zone.

4.2.6 Fencing Requirements

Temporary exclusion fencing will be erected along the entire boundary of the site and will be maintained for the duration of the construction program. The fencing is to ensure unauthorised persons are kept out of the Site. Site access gates would be provided within Emporium Ave and Sepia Road and will be closed at all times outside of the permitted construction hours.

Careful consideration for pedestrian protection shall be included within relevant TGS's, as outlined below.

4.2.7 Pedestrian and Cyclist Management

Chain mesh construction fencing shall be provided along all site frontages accessible by the public to prevent unwanted pedestrian and/or cyclist access.

Pedestrians and cyclists using the footpath fronting the Site will be halted by an accredited Traffic Controller while construction vehicles are entering or exiting the Site. An expandable barrier (pedestrian boom gate or equivalent) would be installed on both sides of the driveway, to be operated when construction vehicles are on approach / ready to depart from the Site. Once the construction vehicles are clear from the footpath, the Traffic Controller can allow the pedestrians and cyclists to continue along their journey. One traffic controller will be allocated to each pedestrian barrier, which will remain closed when not in use and shall only be opened when required.



The Contractor shall make clear to Traffic Controllers that pedestrians have right of way and, as far as reasonable (mostly associated with exit vehicle movements). During peak times, only one truck is to ingress/egress the Site per footpath closure (holding of pedestrians and/or cyclists), and all gueued pedestrian and/or cyclists must be cleared before another vehicle may have access to/from the Site.

Traffic Controllers are required to maintain radio communication with construction vehicle drivers at all times.

4.2.8 Engineering Construction Specifications

Any Signage and/or line marking to be installed as a result of these construction works shall be installed as per Council's Engineering Construction Specification for Civil Works document (October 2017).

4.2.9 Traffic Guidance Scheme's

Any Traffic Guidance Schemes (TGSs), associated risk assessment, consultation schedules, TGS verification checklist, and inspection checklists shall be prepared by an accredited person, in accordance with the TfNSW Traffic Control at Worksites Manual (Issue 6.1) and AS1742.3:2019.

All TGSs involving signage or impacts to public roads shall be approved by the Traffic Management Centre (TMC), prior to the works for which they relate. These TGSs shall be updated to respond to any changes to prevailing traffic conditions throughout the life of the works.



5 Driver Code of Conduct

5.1 Objectives of the Driver Code of conduct

- To minimise the impact of earthworks and construction on the local and regional road network.
- · Minimise conflict with other road users.
- · Minimise road traffic noise; and
- Ensure truck drivers use project approved routes only.

5.2 Code of Conduct

The code of conduct applies to users driving any vehicle for work-related purposes. Drivers are to be issued with a copy of the Driver Code of Conduct, and must comply with all the following:

- Demonstrate safe driving and road safety activities.
- Abide by traffic, road, and environmental legislations.
- Follow site signage and instructions.
- Drivers must only enter and exit the site via the approved entry and exit points and travel routes.
- Drivers must not utilise Bakers Lane for any reason while travelling to or from the Site.

The below activities in any vehicles will be considered as a breach of conduct and will result in removal from site:

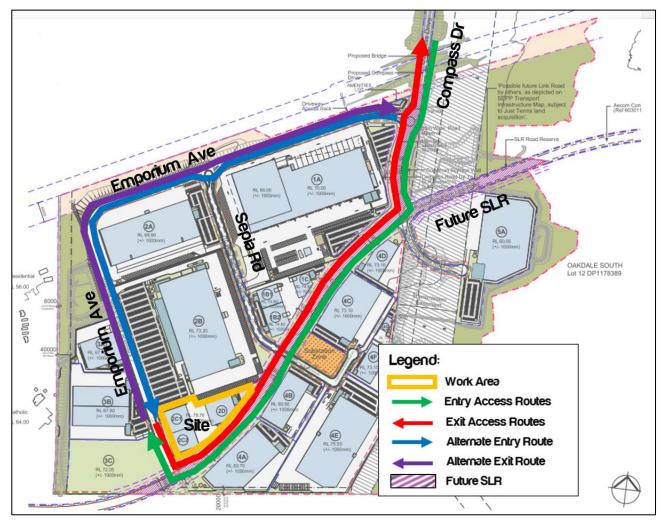
- Reckless or dangerous driving causing injury or death.
- Driving whilst disqualified or not correctly licensed.
- Drinking or being under the influence of drugs while driving
- Failing to stop after an incident.
- Loss of demerit points leading to suspension of licence.
- Any actions that warrant the suspension of a licence
- Exceeding the speed limit in place on any permanent or temporary roads
- The use of roads other than internal roads, and Compass Drive to arrive and/depart from the site to access the wider road network.
- Use of Bakers Lane is not permitted, for any reason.

5.3 Driver Responsibilities

All Drivers on site must:

 Abide with the following route to and from the Site. As such at no time shall a vehicle access the Site via Bakers Lane or Aldington Road for operational use





- Be responsible and accountable for their actions when operating a company vehicle or driving for the purposes of work.
- Display the highest level of professional conduct when driving a vehicle.
- Ensure they have a current driver licence for the class of vehicle they are driving, and this licence is to be always carried.
- Immediately notify their supervisor or manager if their drivers' licence has been suspended, cancelled, or has had limitations applied.
- Comply with all traffic and road legislation when driving.
- Assess hazards while driving.
- Undertake daily pre-start checks of oil, tyre pressures, radiator, and battery levels of company vehicles they regularly use.
- Drive within the legal speed limits, including driving to the conditions.
- Not drive outside of the approved heavy vehicle routes. All drivers must obey weight, length and height restrictions imposed by the National Vehicle Regulator, and other Government agencies. Heavy Vehicles shall adhere to the routes outlined above.
- Be cognisant of the noise and emissions requirements imposed within the EIS, and in a broader sense, the NSW/ Australian Road Rules. Works must be constructed with the aim of achieving the construction noise management levels detailed in the Interim Construction Noise Guideline.
- Do not queue on public roads unless a prior approval has been sought.
- Be aware that at no time may a tracked plant be permitted or required on a paved road.
- Never drive under the influence of alcohol or drugs, including prescription and over the counter medication if they cause drowsiness – to do so will merit disciplinary measures.



- All drivers to report to their supervisor if they have been prescribed medication prior to the start of work.
- Wear a safety seat belt at all times when in the vehicle.
- Avoid distraction when driving the driver will adjust car stereos/mirrors etc. before setting off or pull over safely to do so.
- Report ALL near misses, crashes, and scrapes to their manager,
- Report infringements to a manager at the earliest opportunity.
- Report vehicle defects to a manager prior to the next use of the vehicle.
- Follow the approved site access/egress routes only.
- Follow speed limits as imposed within the estate.
- Keep loads covered at all times.

The Site Team Responsibilities

The Contractor is responsible in taking all steps necessary to ensure company vehicles are as safe as possible and will not require staff to drive under conditions that are unsafe.

This will be achieved by undertaking the following:

- Ensure that all drivers adhere to the designated heavy vehicle routes as required by the route designated above. If a driver accesses the Site contrary to the approved routes, then approval to drive to and from the Site will be revoked by Management.
- Ensuring all vehicles are well maintained and that the equipment enhances driver, operator, and passenger safety by way of:
 - Pre-commencement checks for all new plant arriving on-site and prior to undertaking any work.
 - Daily prestart inspections for all plant, vehicles, and equipment currently on-site.
 - All construction plant must be fitted with a flashing light, fire extinguisher and reverse alarms (or squawkers).
 - Ensure all operators onsite have a current verification of competency (VOC) for their current driver's licence of the appropriate class.
- Ensure maintenance requirements are met and recorded.
- Identify driver training needs and arranging appropriate training or re-training. This may include providing the below:
 - Operator VOC assessment as part of all inductions.
 - Regular Toolbox discussions on safety features, managing fatigue, approved heavy routes, driver responsibility and drink-driving.
- Encouraging Safe Driving behaviour by:
 - Ensuring the subcontractor is informed if their staff become unlicensed.
 - Not covering or reimbursing staff speeding or other infringement notices.
 - Ensuring Legal use of mobile phones in vehicles while driving only
- Encouraging better fuel efficiency by:
 - Use of other transport modes or remote conferencing, whenever practical.
 - Providing training on, and circulating information about, travel planning and efficient driving habits.



5.5 Crash or Incident Procedure

- Stop your vehicle as close to it as possible to the scene, making sure you are not hindering traffic. Ensure your own safety first, then help any injured people and seek assistance immediately if required.
- Ensure the following information is noted:
 - Details of the other vehicles and registration numbers
 - Names and addresses of the other vehicle drivers.
 - Names and addresses of witnesses.
 - Insurers details
- Give the following information to the involved parties:
 - Name, address, and company details
- If the damaged vehicle is not occupied, provide a note with your contact details for the owner to contact the company.
- Ensure that the police are contacted should the following circumstances occur:
 - If there is a disagreement over the cause of the crash.
 - If there are injuries.
 - If you damage property other than your own.
- As soon as reasonably practical, report all details gathered to your manager.

5.6 Environmental Procedures.

A range of measures shall be implemented to ensure the following.

- No dirt or debris from the construction vehicles is tracked on to the public road network.
- Reduce the impacts to sensitive receivers, including, where practicable, starting noisy equipment away from sensitive receivers and implementing respite periods.
- Watering of dusty activities will be undertaken, or activities temporarily halted and then resumed once weather conditions have improved.
- Containment measures for spillages will be provided at appropriate locations and in close proximity to staff car park areas, dangerous goods stores areas and main Project work areas.
- All vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria, and
- Keep an accurate record which includes the range of measures undertaken to reduce environmental impacts.



Transport Impact Assessment

Construction Traffic Generation 6.1

As discussed above, the construction works are expected to generate up to 180 vehicle movements per day. Vehicle movements will be spread generally throughout the day; however, the majority of works will typically generate peak hourly traffic before and after the 'network peak' periods (as outlined within Section 4.1.1).

Following the above, it is expected that stages are to overlap and will therefore increase the demand during each month. The below figure outlines the cumulative daily total for each month of the construction period.

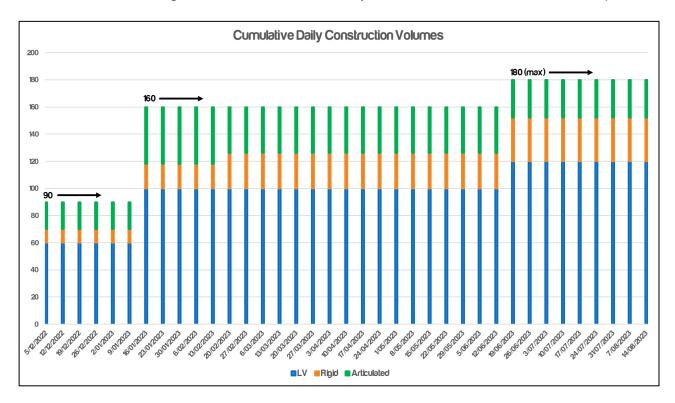


Figure 6: Construction Vehicle Volumes

Impacts on Surrounding Network

The impacts of construction traffic and the mitigating measures to be implemented are outlined below.

- Construction Traffic within Compass Drive: Construction traffic is substantially less than the approved future operational traffic volumes and will therefore not create any unacceptable impacts on the surrounding road network.
- Safety During Construction: Safety to motorists and pedestrians throughout the area will be maintained during construction through the preparation and execution of Traffic Guidance Schemes Plans (TGS's). A range of TGS's will be prepared for each access throughout construction, to identify all reasonably foreseeable hazards, assess the hazards, and manage the hazards as best possible by either eliminating or minimising the risks. TGS's shall be monitored and updated accordingly throughout the project.



• **Reporting**: Reporting and monitoring of movements is to be undertaken to ensure that drivers are adhering to approved construction hours, and to ensure that the approved traffic generation, and subsequent impacts on the road network, are in line with those approved.

In summary, based on the traffic numbers currently envisaged, the traffic impacts are considered acceptable.

6.3 Cumulative Impact

The above relates to construction traffic associated with Lot 2C & 2D works in isolation.

Noting that construction works for the remainder of the OWE infrastructure and Building works will still be underway, each contractor shall liaise regularly in order to avoid any conflict of large deliveries and to ensure that the cumulative construction impacts are minimised and do not exceed approved operational limits.

The following graphs outline cumulative volumes of these projects against the approved daily volumes of the OWE once fully operational (being 11,249 veh/day (MOD 9)). Notwithstanding, the following table outlines the expected construction and operational volumes for the infrastructure and buildings within OWE at the time of the construction works outlined within Section 2.1.

TABLE 6: FORECAST CONSTRUCTION VOLUMES

Development	Approved OWE Volumes (MOD 9)	Forecast Construction Volumes ¹	Difference
Building 1A		1,310	
Building 2A		900	
Building 2C & 2D		180	
Building 3B	11,249	180	-7,505
Building 4E		1,174	
All Other Buildings within OWE		-	
Total ⁴	11,249	3,744	-7,505

Note:

- 1) Forecast construction volumes only relate to approved CTMP's within the OWE.
- 2) Any infrastructure works will cease within Q1 of 2022

As you can see, the cumulative volumes are significantly lower than the approved volumes, which suggests that the cumulative construction shall not create any unacceptable traffic impacts to the road network. As such, the existing infrastructure designed and constructed is sufficient to cater for the proposed traffic volumes



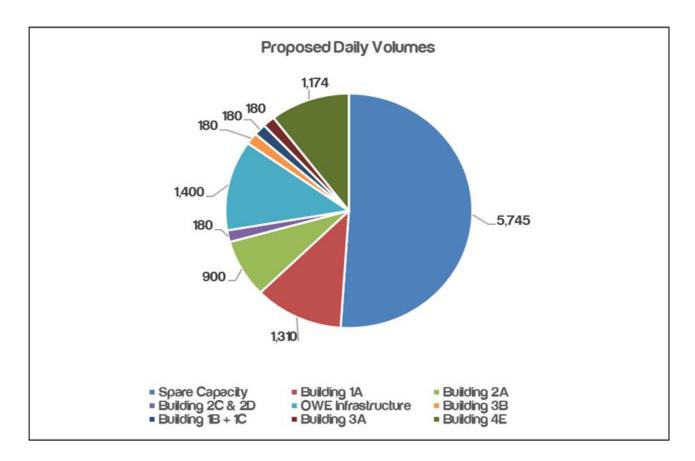


Figure 7: Cumulative Daily Construction Volumes

Plan Administration

7.1 Monitoring Program

This CTMP shall be subject to ongoing review and will be updated accordingly. Regular reviews will be undertaken by the on-site coordinator. As a minimum, review of the CTMP shall occur monthly. All and any reviews undertaken should be documented, however key considerations regarding the review of the CTMP shall be:

- Tracking deliveries against the volumes outlined within report. Deliveries will be tracked against approved volumes and will keep a vehicle log - including rego & time of entry - for the purpose of assessing the effectiveness of these monitoring programs.
- Reporting and monitoring of movements to ensure drivers are adhering to the approved construction hours, and to ensure that the approved traffic generation, and subsequent impacts on the road network, are in line with those approved. This should be undertaken fortnightly during construction.
- To identify any shortfalls and develop an updated action plan to address issues that may arise during construction (Parking and access issues)
- To ensure TGSs are updated (if necessary) by "Prepare a Work Zone Traffic Management Plan" card holders to ensure they remain consistent with the set-up on-site.
- Regular checks undertaken to ensure all loads are entering and leaving site covered as outlined within this CTMP.
- A Dilapidation report shall be undertaken every periodically (once a month) to assess the condition of the road and note whether there has been any reduction in quality of the road as result of construction vehicles.

The development of a program to monitor the effectiveness of this CTMP shall be established by the Contractor. This process is expected to form part of the monitoring plan required to be included as part of the overarching Construction Environmental Management Plan (CEMP), of which this CTMP forms a part.

7.2 Contingency Plan

A contingency plan shall be established by the Contractor and is to be included in the overarching CEMP. Notwithstanding, Table 7 outlines an indicative plan to be undertaken by the builder in the event that the monitoring program identifies the management plan is not effective in managing the construction impacts.

TABLE 7: (TABLE 7: CONTINGENCY PLAN										
Risk		Condition Green	Condition Amber	Condition Red							
Construction Movements	Trigger	Construction traffic volume is in accordance with permissible and programmed volume and time constraints	Construction traffic volumes exceeds programmed volume but is within permissible volume constraints	Construction traffic volumes exceeds permissible volume and time constraints							
	Response	No response required	Review and investigate construction activities, and where appropriate, implement additional remediation measures such as:	As with Condition Amber, plus; If it is concluded that construction activities were directly responsible for the exceedance,							



			 Review CTMP and update where necessary Provide additional training. 	submit an incident report to government agencies. Stop all transportation into and out of the site.		
Queuing	Trigger	No queuing identified	Queuing identified within site	Queuing identified on the public road		
	Response	No response required Continue monitoring program	Review the delivery schedule prepared by the builder. If drivers are not following the correct schedule, then they should be provided with additional training and an extra copy of the Driver Code of Conduct	As with Condition Amber, plus Review and investigate construction activities. If it is concluded that construction activities were directly responsible for the exceedance, submit an incident report to government agencies. Temporary halting of activities and resuming when conditions have improved. Stop all transportation into and out of the site. Review CTMP and update where necessary, provide additional training.		
Noise	Trigger	Noise levels do not exceed imposed noise constraints	Noise levels in minor excess of imposed noise constraints	Noise levels greatly more than imposed noise constraints		
	Response	No response required	Undertake all feasible and reasonable mitigation and management measures to minimise noise impacts.	As with Condition Amber If noise levels cannot be kept below applicable limits, then a different construction method or equipment must be utilised.		
Traffic Guidance Scheme	dance		Minor inconsistencies with TGS to onsite operations	Near miss or incident occurring regardless of / as a result of the TGS being implemented		
	Response	No response required	Traffic Controller to amend TGS on site and to keep a log of all changes	Stop work until an investigation has been undertake into the incident. There are to be changes made to the TGS to ensure that the safety of all workers,		



				students and civilians are catered for.
Dust	Trigger	No observable dust	Minor quantities of dust in the air and tracking on to the road	Large quantities of dust in the air and tracking on to the road
	Response	No response required	Review and investigate construction activities and respective control measures, where appropriate. Implement additional remedial measures, such as: Deployment of additional water sprays Relocation or modification of dust-generating sources Check condition of vibrating grids to ensure they are functioning correctly. Temporary halting of activities and resuming when conditions have improved	As with Condition Amber. If it is concluded that construction activities were directly responsible for the exceedance, submit an incident report to government agencies. Implement relevant responses and undertake immediate review to avoid such occurrence in future.

It is therefore proposed to incorporate the above items within the communications strategy. The contingency plan outlines the most effective methods to ensure that each item identified within the Monitoring Program is adhered to, resulting in the impacts to the wider community being minimised. It also represents the efforts undertaken to continually improve CTMP and ensure that the process being utilised are indeed best practice.

7.3 Communications Strategy

A communications strategy shall be established by the Contractor and is included in the overarching CEMP (refer to the community consultation strategy prepared by SLR). The contractor is to notify the community liaison representative when traffic is expected to exceed the parameters set within "Condition Green" of Table 7. Notwithstanding, Table 8 outlines an indicative communication strategy to ensure that adequate communication with key stakeholders have been met.

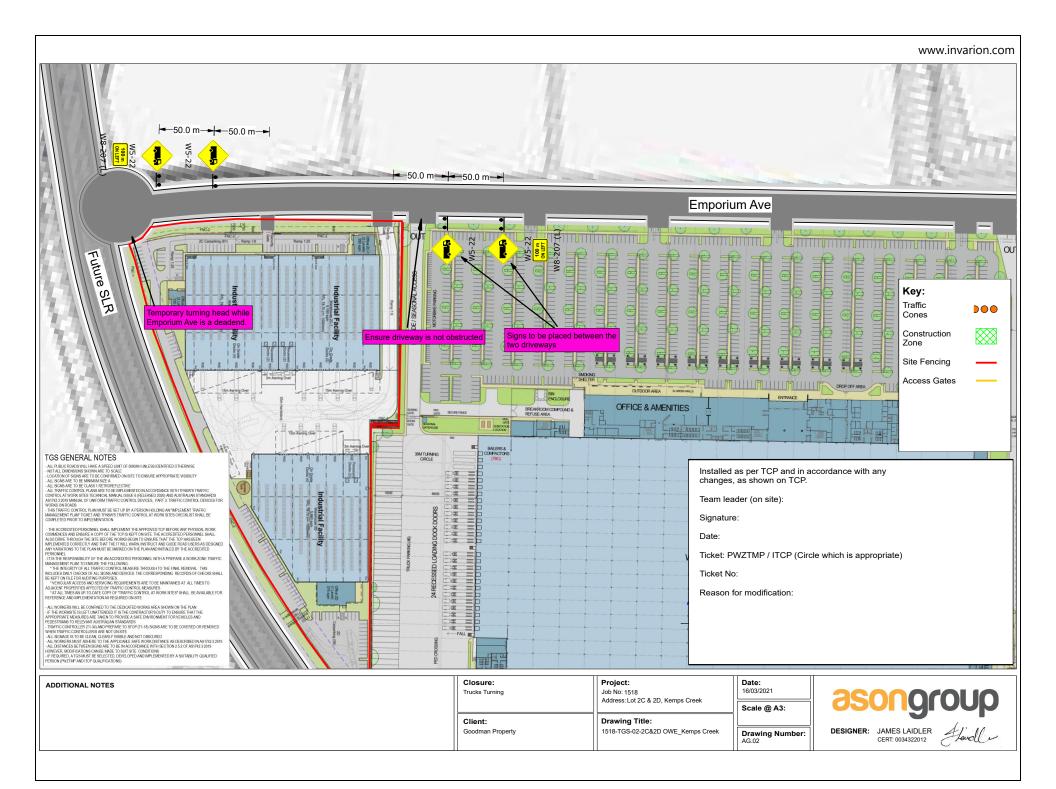


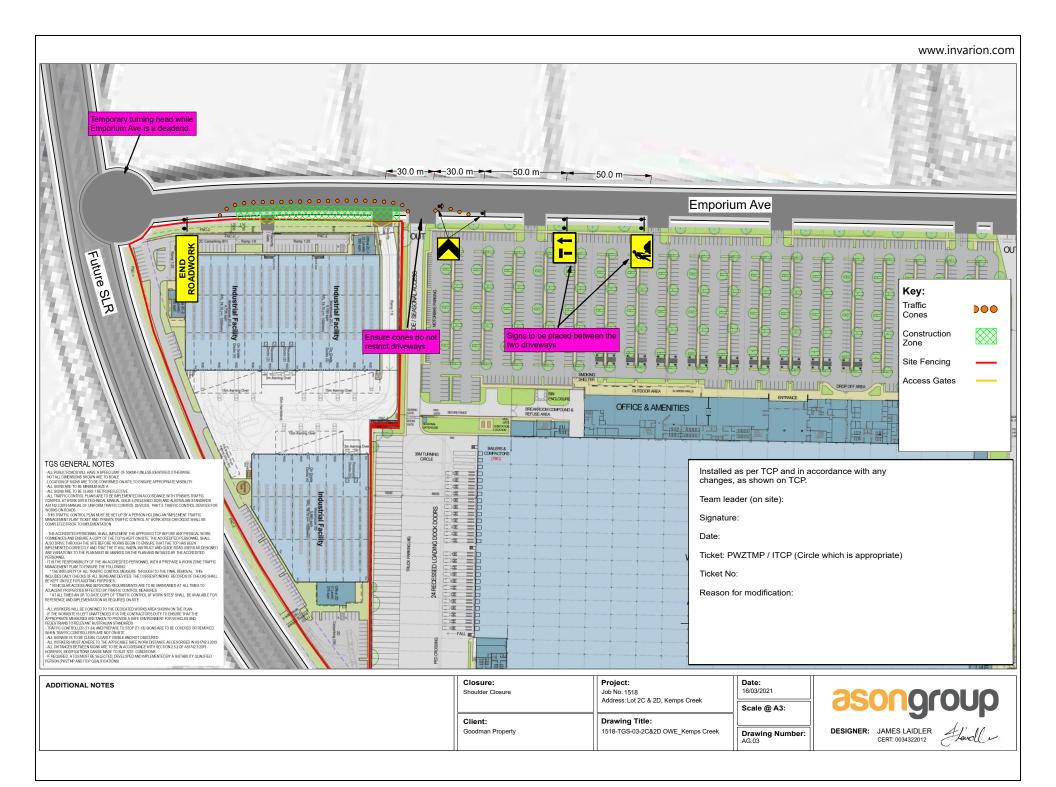
TABLE 8: COMMUNICATION STRATEGY

Risk	Stakeholder	Action
Warehouse Specific Disruption	 TfNSW Penrith Council Transport Management Centre (TMC) NSW Police Emergency Services Goodman Construction Crews 	
Wider Traffic Specific Disruption	 TfNSW Penrith Council Transport Management Centre (TMC) NSW Police Emergency Services Goodman Construction Crews Surrounding Residents / Tenants Schools and Aged Care Facilities in Bakers Lane 	Stakeholder meetings Stakeholder emails

Appendix A. Traffic Guidance Scheme







Appendix B. Risk Assessment



Building 2C & 2D, Oakdale West, Kemps Creek

Risk Assessment and Communication Tool

Project Number	1518									
Project Name	P1518r03 (P1518r03 CC CTMP_Lot 2C & 2D, Oakdale West Industrial Estate								
Site Location	Emporium /	Ave, Oakdale West Estate	, Kemps Creek							
Date of Assessment	16 Mar 202	2								
Revision	Issue I									
Name		Company		Title						
Stephanie Partridge		Goodman		Senior Developm	Senior Development Manager					
Guy Smith		Goodman		Planning Manage	Planning Manager					
Lachlan O'Reilly		Goodman		Project Administrator						
Dora Choi		Ason Group		Principal Lead: Traffic Management & Opera						
James Laidler		Ason Group		Senior Traffic Engineer						
Document Control										
Date Issued	Revision	Revision			Checked By					
16/03/2022	Issue I		J. Laidler							

Risk Matrix		Consequence				
		Minor	Major	Severe	Critical	Catastrophic
		Α	В	С	D	E
Very Unlikely	1	Low	Low	Medium	Medium	Medium
Unlikely	2	Low	Low	Medium	Medium	High
Possible	3	Low	Medium	High	High	High
Likely	4	Medium	Medium	High	High	Extreme
Almost Certain	5	Medium	High	High	Extreme	Extreme

Consequence Description	
A - Minor	Could result in injury or illness not resulting in a lost workday or minimal environmental damage not required to be notified under jurisdiction requirements.
B - Major	Could result in injury or illness resulting in one or more lost workday(s) or environmental damage can be mitigated and is not required to be notified under jurisdiction requirements where restoration activities can be accomplished.
C - Severe	Could result in permanent partial disability, injuries or illness that may result in hospitalisation of persons or environmental damage can be mitigated and is required to be notified under jurisdiction requirements.
D - Critical	Could result in permanent total disability or reversible environmental damage required to be notified under jurisdiction requirements.
E - Catastrophic	Could result in fatality or irreversible severe environmental damage required to be notified under jurisdiction requirements.

Likelihood Description	Design Likelihood
1 - Very unlikely	Industry experience suggests design failure is very unlikely. It can be assumed failure occurrence may not be experienced.
2 - Unlikely	Industry experience suggests design failure is unlikely to occur in the life of design.
3 - Possible	Industry experience suggests design failure is possible sometime during the life of the design.
4 - Likely	Industry experience suggests design failure is likely to occur during the life of the design.
5 - Almost certain	Industry experience suggests design failure is almost certain to occur during the life of the design.

Risk Assessment and Communication Tool

Example

ID. Ref	Risk and/ or Hazard	Risk Description	Location	Existing Control	Initia	Initial Risk Rating		Design Response to risk and /or hazard	Status of Risk	Assignment of risk or	Residual risk rating		k
					С	L	RR			hazard	С	L	RR
1	Unauthorized Access to the Site	Site prevents unauthorised access	Entire Site	Nil	С	3	High	Boundary fence will be provided as part of the main works. The design provides a defined separation between public areas and work area. Admin area is located in front of the site to minimise unauthorised visitor access	Design Solution	Main Contractor	В	2	Low
2	Interaction between pedestrians and vehicles	Vehicles and pedestrians to be separates as best possible	Entire Site & Access Roads	Nil	D	3	High	Additional signage and implementation of Traffic Controllers shall be provided to separate vehicles and pedestrians as best possible.	Design Solution	Main Contractor	В	2	Low
3	Potential vehicle conflict points	Vehicles can crash with each other while manoeuvring through the site	Entire Site & Access Roads	Nil	В	3	Medium	One-way manoeuvring around the site limits any interaction for oncoming vehicles to the access only, coupled with low speeds throughout the site.	Design Solution	Main Contractor	В	1	Low

4	Fatigue	Injury caused by fatigue	Entire Site	Nil	С	3	High	Toolbox meetings and regular breaks (in line with WHS practices) to minimise fatigue	Design Solution	Main Contractor	В	1	Low
5	Fall risks	Injury due to falls (in general)	Entire Site	Nil	Е	3	High	Ensuring level changes across the site to be minimised as best possible, with additional black & yellow hazard tape/marking being installed where appropriate. Installation of handrails where level changes / ramps grades are significant.	Design Solution	Main Contractor	С	2	Medium
6	Misdirected access into wrong site	Vehicle in unsafe locations	Entire Site	Nil	С	3	High	Ensuring appropriate directional signage has been provided to ensure vehicles do not access the wrong construction site, which could create potential safety breaches and hazards for all partied	Design Solution	Main Contractor	В	2	Low
7	Conflicting Traffic Management	Coordinating Traffic Controllers could create misleading and wrong advice	Entire Site	Nil	С	3	High	Toolbox meetings, regular liaison with all construction teams and review of signage plans on site in order to minimise contradicting signage.	Design Solution	Main Contractor	С	2	Medium

Appendix C. TGS Verification Checklist



E.2 TGS verification checklist

TGS Verification must be undertaken after selecting or designing a TGS as a confirmation of appropriateness prior to approval for use. A PWZTMP or TGS qualified person must undertake this verification.

Completed by:						
Name:	James Laidler Signature:			Heel		
Qualification	Senior Traffic Engineer PWZTMP #0052158569		•			
TGS details:						
TMP Reference:	P1518r03 CC CTMP_Lot 2C & 2D, Oakdale West Industrial Estate	TGS Reference:				
Date:	16/03/2022	Review type	☑ Site Insp		☑ Desktop Review	
Sources used for desktop review	Near Map, Dated 17 Feb 2022					
Site details						
Street name:	Compass Drive	Confirmed posted s limits:	speed	60km/l	n	
Street name:	Emporium Ave	Confirmed posted s limits:	50km/h			
List unique site-s	specific Hazards / Risks identified	on site				
E.g., utilities, infi	astructure, vegetation, schools,					
n/a - straight section of the sectio	of road with good sight distance lo ne area	w volume of traffic at a c	ul-de-sac			

TGS details					
Have the below been addressed on the TGS for this location?					
Traffic volumes	✓ Yes	□ No	□ N/A	Details	Road still private, therefore access is limited, and volumes are low
Predicted queue length	✓ Yes	□ No	□ N/A	Details	Noting the number of access points, the predicted queue length will minimal
Shoulder widths	✓ Yes	□ No	□ N/A	Details	Roads Designed for B-doubles, therefore sufficient shoulder widths
Sight distances	✓ Yes	□ No	□ N/A	Details	Straight road with no obstructions and good sight distance
Existing infrastructure	✓ Yes	□ No	□ N/A	Details	No trees, poles, or other infrastructure
Transport services	✓ Yes	□ No	□ N/A	Details	The bus route will not be affected by the works
Pedestrian generators	✓ Yes	□ No	□ N/A	Details	Pedestrians are given right of way as far as possible
Appropriate site access	✓ Yes	□ No	□ N/A	Details	Roads Designed for B-doubles, therefore appropriate site access
Appropriate escape route for traffic controllers	Yes	□ No	☑ N/A	Details	No Traffic Controllers required for this TGS

Confirmation			
Does TGS require adjustments within	tolerances?		
If yes provide details TGS must include these adjustments with justification.			
Comments or details of action taken:			
Does TGS require any additional chan	ges or modifications?		
If yes provide details and return TGS to designer for additional changes or modifications			
Comments or details of action taken:			
Is TGS appropriate for use for works r	equired at this location?		
If no provide details and, return TGS in designer for correction	nto file and select alternative, if design returned to	☑ Yes □ No	
Comments or details of action taken:			
Have key TTM risks been addressed o	n site?		
	to designer for correction, review, and approval	☑ Yes □ No	
Comments or details of action taken:			



APPENDIX J

Soil and Water Management Plan



PROPOSED INDUSTRIAL DEVELOPMENT – OAKDALE WEST ESTATE – BUILDING 2C & 2D

SOIL & WATER MANAGEMENT

PLAN

March 2022 - Revision 0

Prepared for:



Prepared by:

ANDREW LITTLEWOOD

CPESC & Senior Soil Conservationist



Document Status

Rev	Date	Revision	Prepared by	Reviewed		Approved	
No.	Date	Description		Name	Date	Name	Date
0	18/03/2022	Revision 0	A Littlewood				

Document Authorship Information

Project	Proposed Industrial Development – Oakdale West Estate – Building 2C & 2D, Lot			
	107 DP 1262310			
Document	Soil & Water Management Plan – Construction of Building 2C & 2D			
Document Author	Andrew Littlewood – Senior Soil Conservationist			
Qualification	Certified Professional in Erosion and Sediment Control (CPESC No. 5988).			
Relevant Training	SEEC and IECA (Australasia) – 'Water Management on Construction sites' &			
	'Preparing and Reviewing Plans for Soil and Water Management' – 2009			
	University of Western Sydney and Hawkesbury Global Ltd - Certificate of			
	Attainment in Soil and Water Management for Urban Development - 2000			
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Previous Employment	Erosion and Sediment Control Officer - Lake Macquarie City Council (2000 – 2007)			
Professional Affiliations	Member of International Erosion Control Association (Australasia)			

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Appendix A: Erosion & Sediment Control Plan

1.0 INTRODUCTION

1.1 Context

This Soil and Water Management Plan (SWMP or Plan) forms part of the Construction Environmental Management Plan (CEMP) for the proposed construction of Building 2C & 2D on Lot 107 DP 1262310 (the Project) on the Stage 2 Development of Oakdale West Estate (OWE). The buildings 2C & 2D will be constructed concurrently for the purposes of warehousing and distribution uses.

Goodman Group as developer of the OWE has gained the relevant development approvals and has elected to prepare a CEMP for the Project. The CEMP has been developed in preparation for the award of a Construction Contract to a suitably qualified building contractor (Contractor) to undertake the construction of the Project.

This SWMP is required to support the CEMP, and has been prepared to address the requirements of;

- Department of Planning, Industry and Environment Development Application State Significant Development (SSD) 7348, including subsequent Modifications of Development Consent No's 1 to 9.
- Department of Planning, Industry and Environment Development Application State Significant Development SSD 9794683 Development Consent.

1.2 Background

Goodman Group received approval on 13 September 2019 for the state significant development of Oakdale West Industrial Estate (OWE). OWE comprises a warehousing and distribution hub located at Kemps Creek in Western Sydney, NSW. The overall site a 154-hectare tract of land that comprises of the combined parcels of land known as Lot 3031 DP 1168407, Lot 6 DP 229784, Lot 2 DP 84578, Lot 3 DP 85393, Lot 11 DP 1178389 off Bakers Lane, at Kemps Creek, extending to Lenore Drive, Erskine Park.

As part of the staged development of OWE, Goodman has gained consent for development (SSD 7348 Development Consent - Mod 1 - 9) and separately, has been granted Development Consent SSD 9794683 for the Stage 3 Development which involves the development of land now known as Lot 107 DP 1262310. The western boundary of the lot has road frontage to the newly proclaimed public road known as Emporium Avenue, whilst the southern boundary has frontage to the Oakdale West Estate's Construction Access Road (CAR). The relevant portion of the industrial development will entail the construction of both Building 2C & 2D. Building 2C comprises of a single level warehouse and two-level office building. Building 2D comprises of a single level warehouse and one-level office building. The combined buildings' specifications will comprise 15745m² of warehousing space, 1055m² of office facilities, awnings, loading docks, parking facilities and associated landscaping on a 37370m² site. The

The EIS produced for NSW DPI&E - DA SSD 7348 has assessed the impacts of the project on surface water and soils. The EIS prepared by Urbis noted at Section 2.3 that;

Topography & landform

- 'Landform is relatively uniform, with undulating rises and alluvial flats bisected by narrow, ridge running from the south-west to the north-east of the site.
- No significant height variances with elevations from approximately 92m above AHD to approximately 50m at Ropes Creek in the east of the site.'

Geology

- 'Underlying geology of the site is the Wiananmatta Group formation (Bringelly Shale) and alluvium associated with Ropes Creek. Surface and sub-surface conditions are as follows:
 - o Topsoil: Clay, depth 0.0-0.04 m;
 - o Natural Soil: Clay, depth 0.04-0.5 m;
 - o Bedrock: Sandstone, Sandstone and shale, depth 0.7-5.0 m.

<u>Soils</u>

- 'Residual soils, characteristic of the Blacktown soil landscape, generally consist of shallow duplex soils over a clay base (OEH 2014).
- Overlying fluvial soils, part of the South Creek soil landscape, are associated with the alluvium across the low-lying terrain bordering Ropes Creek.
- No acid sulphate soils have been identified.

Surface Water, Hydrology and Flooding

- 'The OWE is located within the Hawkesbury-Nepean catchment.
- Ropes Creek, a third order stream, flows along the eastern boundary of the site in a northerly direction into South/Wianamatta Creek approximately 13 km north of the OWE.
- The landscape is characterised by a series of ridgelines incised with drainage lines flowing into Ropes Creek. The drainage system within the development site is in relatively poor condition, due to erosion and trampling by cattle.
- An unnamed modified watercourse is to the west of the OWE.
- The eastern portion of the site is subject to flooding (associated with Ropes Creek) and is variably affected by the 100-year average recurrence interval (ARI) flood event.'

Groundwater

'Groundwater is expected to be relatively deep below the OWE site – no groundwater was
encountered during geotechnical investigations which included boreholes drilled up to 15m
below ground level.'

Prior to the works commencing that are the subject of this SWMP, the site has had bulk earthworks undertaken by others under the approved SSD 7348 - Stage 1 Development. As a result of the preliminary bulk earthworks, the natural topography of the site has been significantly altered, from having localised slopes to being a slightly graded, level pad with a retaining wall on the northern boundary.

The overall disturbance footprint of approximately 3.75 hectares would present a moderate risk of increased sediment and contaminant impacts on water quality of local waterways due to runoff from the Project.

The EIS concluded potential impacts would be minimised through the employment of safeguards and management measures stated in Section 7.1 of the EIS.

1.3 Environmental management systems overview

The overall Environmental Management System for the project is described in the Construction Environmental Management Plan (CEMP).

The SWMP will form part of the selected Contractor's environmental management framework for the project, as described in the CEMP. Management measures identified in this Plan will be incorporated into site or activity specific Environmental Work Method Statements (EWMS).

EWMS will be developed and signed off by environment and management representatives prior to associated works. Construction personnel will be required to undertake works in accordance with the identified mitigation and management measures. Works that are proposed in or near to identified Environmentally Sensitive Areas will have an EWMS prepared that details relevant environmental protection measures.

The Progressive Erosion and Sediment Control Plans (PESCPs) will be prepared in consideration of the Primary Erosion and Sediment Control Plan (ESCP) attached to this SWMP as Appendix A.

The ESCP describes the intentions and fundamental principles for erosion and sediment control management for the duration of the entire project.

The PESCPs will be developed by the Project environmental team in consultation with construction personnel, and with the assistance of the Project Soil Conservationist (Certified Professional in Erosion & Sediment Control - CPESC) when required.

They will be developed prior to any construction works commencing in the work zone and will be modified as required when:

- Site conditions evolve.
- Flow paths change.
- Construction activities that affect the characteristics of ground conditions change.

A Project Soil Conservationist (CPESC) will be engaged and consulted throughout construction to provide advice on erosion and sediment control design, installation, maintenance, and the development of PESCPs.

Used together, the CEMP, strategies, procedures, EWMS and PESCP form management guidelines that clearly identify required environmental management actions for reference by the Contractor's personnel and sub-contractors.

The review and document control processes for this Plan are described in the CEMP

2.0 PURPOSE & OBJECTIVES

2.1 Purpose

The purpose of this Plan is to describe how the Contractor will manage and minimise soil and water impacts during construction of the project.

2.2 Objectives

The key objective of the SWMP is to ensure that the potential impacts to soil and water quality are minimised. To achieve this objective, the Contractor will be required undertake the following:

- Ensure appropriate controls and procedures are implemented during construction activities to avoid or minimise erosion and sedimentation impacts and potential impacts to water quality in creeks, waterways, and groundwater along the project corridor.
- Ensure compliance with the Project's Development Application SSD 7348 Secretary's Environmental Assessment Requirements (SEARS)
- Ensure appropriate measures are implemented to address the relevant mitigation measures detailed in the EIS.
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 3.1 of this Plan.

2.3 Targets

The following targets have been established for the management of soil and water impacts during the project:

- Ensure compliance with the relevant legislative requirements and environmental safeguards.
- Meet New South Wales Environment Protection Authority (NSW EPA) water quality discharge parameters for all planned basin discharges.
- Manage downstream water quality impacts attributable to the project (i.e., maintain waterway
 health by avoiding the introduction of nutrients, sediment, and chemicals outside of that
 permitted by the NSW EPA and ANZECC guidelines).
- Ensure training on soil and water management is provided to all construction personnel through targeted training, site inductions and toolbox talks.

3.0 ENVIRONMENTAL REQUIREMENTS

3.1 Relevant legislation and guidelines

3.1.1 Legislation

Legislation and regulations relevant to soil and water management includes:

- Environmental Planning and Assessment Act 1979 (EP&A Act).
- Environmental Planning and Assessment Regulation 2000.
- Protection of the Environment Operations Act 1997 (POEO Act).
- Water Management Act 2000.

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in the CEMP.

Section 120 of the NSW POEO Act states that it is illegal to pollute waters. Under the POEO Act, 'water pollution' includes introducing litter, sediment, oil, grease, wash water, debris, and flammable liquids such as paint etc. into waters or placing such material where it is likely to be washed or blown into waters or the stormwater system or percolate into groundwater. All practicable steps should be taken to minimise the risk of pollution of waters.

3.1.2. Guidelines and standards

The main guidelines, specifications, and policy documents relevant to this Plan include:

- Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (EPA, March 2004).
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC and ARMCANZ 2000).
- Managing Urban Stormwater: Soils and Construction. Landcom, (4th Edition) March 2004 (reprinted 2006) (the "Blue Book"). Volume 1 and Volume 2.
- Volume 2A Installation of Services (DECCW 2008).

3.2 Environmental management measures

Environmental safeguards and management measures are included in the EIS in Section 9. The environmental management measures relevant to this Plan are listed Table 3-2 below. The Table 3.2 includes reference to required outcomes, the timing of when the commitment applies and the section of this Plan or other management system document which addresses the requirement.

Table 3-2: Management measures from the EIS relevant to construction soil and water management

Issue	SSDA Component	Mitigation & Management
General Construction Management	Stage 1 Development	 A CEMP to be prepared for the OWE Stage 1 Development capturing standard and specific management and mitigation measures as described in the SSDA, EIS and supporting technical documents.
Earthworks	Stage 1 Development	 Erosion and sediment controls included in SSDA package (Appendix E).
Soils & Water	Stage 1 Development	 Erosion and sediment controls, as detailed in Appendix E and Appendix J of the EIS, to be implemented through CEMP.
		 Stormwater to be treated to compliant levels prior to discharge.
		 Gross Pollutant Trap (GPT) to be installed within each development site on the final downstream stormwater pit prior to discharge.
Groundwater	Stage 1 Development	 Methods and management of any required dewatering required during construction works to be detailed in the CEMP.
Air Quality and Odour - Construction	Stage 1 Development	 CEMP to include standard air quality control measures, contingency plans and response procedures and suitable reporting and performance monitoring procedures.
		 CEMP to include standard odour mitigation measures for construction including keeping excavation surfaces moist covering excavation faces and/or stockpiles, use of soil vapour extraction systems and regular monitoring of discharges as appropriate

The State Significant Development (SSD) Consent Condition requirements for SSD 7348 and SSD 9794683 are addressed in Section 5 of the Erosion and Sediment Control Plan (See Appendix A).

3.3 Construction Environmental Management Plan

The EIS Section 7.2 'Construction Environmental Management Plan' outlines the requirements for the OWE CEMP to address construction methodology and associated management & mitigation measures, as follows;

'The proposed OWE development would proceed in accordance with a detailed CEMP to be prepared for the site to capture both standard construction methodology, mitigation and management measures and specific measures recommended for the OWE proposal by technical assessments and studies.

The standard construction methodology to be followed in respect of the proposed development includes:

- Diversion of "clean" water away from the disturbed areas and discharge via suitable scour protection.
- Provision of hay bale type flow diverters to catch drainage and divert to "clean" water drains.
- Diversion of sediment laden water into temporary sediment control basins to capture the design storm volume and undertake flocculation (if required).
- Provision of construction traffic shaker grids and washdown to prevent vehicles carrying soils beyond the site.
- Provision of catch drains to carry sediment-laden water to sediment basins.
- Provision of silt fences to filter and retain sediments at source.
- Where future construction and building works are not proposed, the rapid stabilisation of disturbed and exposed ground surfaces with hydroseeding.

The above <u>measures would remain in place for the duration of the total construction period</u> (Stages 1, 2 and 3) until such time as the individual development lots are completed. Regular inspection of erosion and sediment control measures and other construction mitigations would be undertaken by the site contractor in accordance with the protocols established under the CEMP.

The Contractor CEMP for Building 2C & 2D will be prepared prior to the commencement of construction works on the site and will detail measures that are in accordance with the OWE CEMP.

4.0 EXISTING ENVIRONMENT

The following sections summarise what is known about factors influencing soils and water quality within and adjacent to the project corridor. The key references in the Project EIS documents are Section 6.7 – Other Issues.

4.1 Topography and soil characteristics

Section 2.3 of the EIS for DA SSD 7348 describes the pre-existing topography and geology of the Project area as follows;

- "Landform is relatively uniform, with undulating rises and alluvial flats bisected by narrow, ridge running from the south-west to the north-east of the site. No significant height variances with elevations from approximately 92m above AHD to approximately 50m at Ropes Creek in the east of the site.
- "Underlying geology of the site is the Wiananmatta Group formation (Bringelly Shale) and alluvium associated with Ropes Creek.
- Underlying geology of the site is the Wiananmatta Group formation (Bringelly Shale) and alluvium associated with Ropes Creek. Surface and sub-surface conditions are as follows:
- Topsoil: Clay, depth 0.0-0.04 m;
- Natural Soil: Clay, depth 0.04-0.5 m;
- Bedrock: Sandstone, Sandstone and shale, depth 0.7-5.0 m.'
- Residual soils, characteristic of the Blacktown soil landscape, generally consist of shallow duplex soils over a clay base (OEH 2014).
- Overlying fluvial soils, part of the South Creek soil landscape, are associated with the alluvium across the low-lying terrain bordering Ropes Creek.
- No acid sulphate soils have been identified."

The predominant soil landscape characteristics are described in general terms in the EIS prepared for SSD 7348, however, further reference to NSW Office of Environment & Heritage website resource 'eSPADE', identified the presence of the 'Luddenham' (lu) soil landscape unit, which underlies the Project footprint.

4.1.1. 'Luddenham' (lu) landscape unit

The 'Luddenham' (lu) soil landscape unit mainly occurs in the south and west in the Cumberland Lowland on the lesser isolated ridgelines. This soil landscape is also underlain by Wianamatta Group, Ashfield Shale and Bringelly Shale formations. The Ashfield Shale consists of laminite and dark grey shale. Bringelly Shale consists of shale, calcareous claystone, and laminite. Between these two shale members is the Minchinbury Sandstone consisting of fine to medium-grained lithic quartz sandstone.

This soil landscape occurs on low rolling to steep low hills with slopes ranging from 5-20% grade. The main soils are shallow dark podzolic or massive earthy clays on crests and upper slopes loams ranging to Yellow Podzolic soils and prairie soils on lower slopes and drainage lines.

The erosion hazard of the soil type is rated as Moderate to Very High for non-concentrated flows and High to Very High for concentrated flows. Other physical limitations of the landscape unit include hard setting soil profiles, low wet strength, high shrink swell, mass movement hazard and moderately reactive soil materials. The chemical soil characteristics range from Strongly Acidic to Slightly Acidic (pH commonly ranging from 4.0 - 6.5), low fertility, and generally low available water capacity.



Figure 4.1.1 – Extract map of the occurrence of the 'Luddenham' (lu)soil landscape unit

4.2 Acid Sulphate Soils

Potential Acid Sulfate Soils are soils that have concentrations of iron sulphide layers that can oxidise when exposed to oxygen generating sulphuric acid. In general, these soils occur less than 5 metres elevation above sea level and are predominantly restricted to low-lying coastal areas, adjoining estuarine areas. More recently, acid sulphate soils have been identified in long-term, drought-affected inland areas where water levels have dropped in waterways and wetlands, exposing acid sulphate material that has subsequently oxidised.

Given the general elevation and the soil types described within the Project area, acid sulphate soils are unlikely to occur in the area. A review of the relevant Acid Sulfate Soil Risk Map (ASSMAC – DLWC 1998) confirmed the Project area falls outside the study area of this resource.

Further reference to the online soil mapping resource 'eSpade' (NSW Department of Environment & Heritage) indicate that the site is not situated in an area at risk of Acid Sulphate soils. The map indicates the closest known occurrence is in the upper reaches of the Parramatta River and Georges River to the east and southeast of the Project.

4.3 Surface water

The Project is located on a level pad with a retaining wall on the northern boundary. Preparatory earthworks by others have established a cut off drain on the southern boundary, draining to a temporary sediment basin in the south-western sector of the site. The drainage pattern is ephemeral with runoff generated in response to prolonged rainfall or storm events.

4.4 Water Quality and Receiving Environment Assessment

The Project activities that have the potential risk of negative impacts on water quality parameters include:

- Establishing or relocating 'dirty' water drains and 'clean' water diversions
- Installing erosion and sediment controls.
- Minor earthworks, site preparation and temporary access roads.
- Trenching and earthworks for service installation.
- In-situ concrete works and concrete curing.
- Stormwater construction and drainage stabilisation.
- Dewatering 'dirty' water from site areas and sediment basin operations.
- Spills & leaks of fuels & oils from mobile and static machinery.
- Storage of chemicals, fuels & oils.
- Generation of building and construction waste.
- Importing, handling, stockpiling, and transporting materials & resources.
- Plant maintenance.
- General waste generation from compound/s & works areas.

The determination of the assessment of the drainage patterns, the heavily modified existing receiving environments, and the attributes of the receiving waters in the vicinity of the Project have been assessed as 'standard' in accordance with Blue Book Volume 1- Sect. 6.3.4 - (f) & Volume 2D – Table 6.1.

4.5 Groundwater

The presence of groundwater primarily impacts on erosion and sediment control during construction with regard to piling, foundation earthworks, trenching for drainage and services, culvert construction, and sediment basin construction. The EIS prepared for DA SSD 7348 at Section 2.3 describes the groundwater characteristics of the Project area as follows;

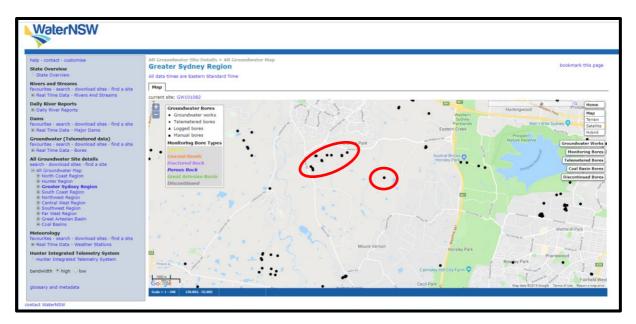
"Groundwater is expected to be relatively deep below the OWE site – no groundwater was encountered during geotechnical investigations which included boreholes drilled up to 15m below ground level."

There are no obvious indicators of shallow groundwater sources, however the detectable presence of groundwater at or near the soil surface is highly dependent on seasonality and rainfall rates. Further assessment was undertaken the NSW Groundwater Bore Database (Department of Primary Industries – Water 2018).

The database was reviewed for information on existing groundwater bores in a three-kilometre radius of the Project area. Thirteen (13) groundwater sites were located in close proximity to the Project. Groundwater drill records for several sites were reviewed with final bore depths commonly being 50-60m below ground level. Groundwater table depths were not indicated.

In summary, the assessment indicates that groundwater is not likely to impact on the scope of the Project works.

Figure 4.5 – Extract map of the occurrence of groundwater bores in the Project vicinity. (Note the nearest groundwater bores indicated are circled in red)



4.6 Rainfall

Rainfall data was assessed from the Sydney Equestrian Centre Automatic Weather Station (AWS), located approximately 5 kilometres south-east of the Project at Horsley Park. This data was recorded between 1997 to 2022. (Bureau of Meteorology, 2021). The Sydney Equestrian Centre AWS was also selected for the Project as it will provide real time weather monitoring during the proposed construction period.

Rainfall data collected shows that typically rainfall is higher during summer and autumn. Winter and spring are generally drier periods during the year. February is the wettest month, with a mean rainfall total of 124.5 millimetres. Both the mean and median average annual rainfall totals are 780.3 mm and 724.7 mm, respectively. Table 4-6 below provides a summary of climate data at the weather station.

Table 4-6 - Summary of rainfall records

	Summary of rainfall records from 1997 - 2022												
Sum	mer		A	Nutumn			Winter			Spring	J	Summ	er
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec	Year
Mean rainfall	74.3	124.5	94.5	67.0	42.9	71.3	38.4	39.1	36.4	60.8	78.8	66.2	780.3
Mean rain days >1mm	7.8	7.6	8.7	6.5	5.0	6.3	5.0	4.0	4.7	5.9	7.2	7.2	75.9

Red = highest value blue = lowest value

4.7 Rainfall erosivity factor and design rainfall depth

The rainfall erosivity factor is a measure of the ability of rainfall to cause erosion (referred to as "R" in the Revised Universal Soil Loss Equation - RUSLE). The rainfall erosivity factor is used to determine the soil loss in tonnes per hectare over one year and is used in calculations when sizing construction sediment basins.

The rainfall erosivity factor which is referred to as the 'R' Factor has been assessed from an Intensity Frequency Duration Table (see below) prepared for the site based on the 2-year, 6 hours storm event of 9.13 mm/hour. The R Factor value of 1892 is calculated from the 0.5 'Exceedances per year', 6 Hour storm of 9.13 mm/hour being 'S', where $R = 164.74(1.1177)^sS^{0.6444}$, as per the Blue Book - Appendix A2 & B.

The nearest 'Blue Book' centre for detailed rainfall depths is Blacktown which is approximately 12kms north-east of The Project (Blue Book Volume 1- Table 6.3a). As noted above at Section 4.3, the Project was assessed as 'standard' in accordance with Blue Book Volume 1- Sect. 6.3.4 – (f) & Volume 2D – Table 6.1, however, we have elected to adopt the 5-day 85th percentile rainfall depth for Blacktown of 32.2mm.

Australian Government Bureau of Meteorology Location Latitude: -33.8294 [Nearest grid cell: 33.8375 (<u>S</u>)] Longitude:150,7972 [Nearest grid cell: 150,7875 (E)] Very Frequent Design Rainfall Depth (mm) Issued: 18 March 2022 Rainfall depth for Durations, Exceedance per Year (EY), and Annual Exceedance Probabilities (AEP). FAQ for New ARR probability terminology. Exceedance per Year (EY) 12EY 6EY 0,5EY# 0,2EY* 3EY 2EY 1EY 2,03 2,57 1 min 0.817 0.942 1.17 1,33 1.58 3.31 1.63 2 min 1.39 2.01 2.28 2.66 3.32 4.15 5.24 2.21 2.75 3.14 3.68 4.61 7.33 3 min 1.89 5.79 4 min 3.17 4.57 10 mir 4.11 4.83 6.13 7.07 8.44 10.9 13.9 18.0 15 min 5,09 5,97 7,57 8,75 10,5 13,6 17,3 22,5 20 min 5.83 6.84 8.67 10.0 12.0 15.6 19.9 25.7 25 min 9.55 11.0 30 <u>min</u> 16.5 21.4 27.0 10.6 13.4 15.3 18.3 23.6 29.7 37.7 9.11 1.5 hour 10.5 12.3 15.4 17.6 20.9 26.9 33.7 42.5 2 hour 11.7 13.6 17.0 19.5 23.1 29.6 37.0 46.3 19.5 22,4 26.5 34.0 42.3 52,7 13.4 15.6 19.6 22.9 28.9 33.4 40.0 51.9 80.8 12 hour 21,5 25,3 32,1 37.2 44,7 58,4 73,1 91.9 18 hour 24.5 29.0 37.2 43.2 52.3 69.0 86.9

Table 4.7 - Intensity Frequency & Duration Table

4.8 Flooding

The Flood Impact Assessment was prepared for the approved SSD 7348 Concept Proposal and Stage 1 development EIS (at Appendix P), detailing the flooding risks and characteristics of the Project area. The EIS flood modelling concluded that flood impacts were mainly confined to the Ropes Creek flood plain and we note that Project site is elevated well above the 100-year ARI flood levels. The EIS does not propose any flood mitigation or management measures area during the OWE construction. We refer to the Figure 35, Page 145 of the EIS, partly reproduced below (Note the Project footprint is not shown on Figure 35, and its approximate position is to the west of centre, far left of frame).

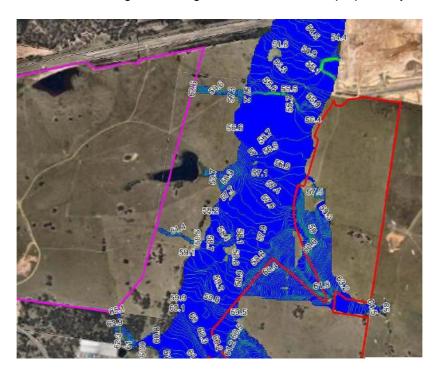


Figure 4.8 – Extract of Figure 35, Page 145 of the OWE EIS prepared by Urbis

5 ENVIRONMENTAL ASPECTS AND IMPACTS

5.1 Construction activities

Key aspects of the project that could result in adverse impacts to soils and water include:

- Installation of preliminary erosion and sediment controls and establishment of off-site water diversions.
- Establishment of compounds, exclusion zones, stockpile areas, and soils treatment area/s.
- Minor earthworks, site preparation and site access/temporary access roads.
- Trenching and earthworks for service installation.
- In-situ concrete works and concrete curing.
- · Asphalt paving activities.
- Operation of internal haulage and access routes.
- Stormwater construction and drainage stabilisation, including temporary sediment basins.
- Dewatering 'dirty' water from site areas and sediment basin operations

- Importing, handling, stockpiling, and transporting materials & resources.
- Compound operation including fuel and chemical storage, refuelling and chemical handling.
- Storage of chemicals, fuels & oils.
- Spills & leaks of fuels & oils from mobile and static machinery.
- Plant maintenance.
- · Generation of building and construction waste
- General putrescible waste from compound/s & works areas
- Noxious weed treatment including herbicide spraying.
- Topsoil replacement, revegetation, and landscaping
- Landscaping.

Refer also to the Aspects and Impacts Register included in the CEMP.

5.2 Impacts

The potential for impacts on soil and water will depend on a number of factors. Primarily, impacts will be dependent on the nature, extent and magnitude of construction activities and their interaction with the natural environment. Potential impacts attributable to construction might include:

- Exposure and disturbance of soils during earthworks, creating the potential for off-site transport of eroded sediments and pollutants.
- Alteration of surface and subsurface flows that could cause disturbances to hydrology and hydraulics.
- Off-site discharge of water containing sediment from dewatering activities.
- Contamination of soils, and surface and groundwater from accidental spills or oil leaks. This
 might include grease or fuel from machinery and vehicles, construction sites or compounds,
 or spills of other chemicals that may be used during the course of construction.
- Disturbance of unidentified contaminated land e.g., pesticide/chemical concentrations in soil from historical land use practices, and subsequent generation of contaminated runoff.
- Litter and gross pollutants from construction activities.
- Erosion and sedimentation of active construction zones during construction of the project as a result of a large rainfall event or storm event.

Some impacts on soil and water attributable to the Project are anticipated. Relevant aspects and the potential for related impacts have been considered in a risk assessment in the CEMP.

A full list of management measures associated with soil and water are detailed in Section 6 of this Plan below.

6 ENVIRONMENTAL CONTROL MEASURES

Specific measures and requirements to address soil and water management are outlined in in Table 6-1.

Table 6-1 - Management and mitigation measures

ID	Measure / Requirement	When to implement	Responsibility	Reference
General				
SW1	Training will be provided to all project personnel, including relevant sub-contractors on sound erosion and sediment control practices and the requirements from this plan through inductions, toolbox talks and pre-start briefings.	Pre-construction Construction	Project Manager / Environmental Site Representative	Managing Urban Stormwater: Soils and Construction Volumes 1 & 2A
SW2	A Project Soil Conservationist (CPESC) will be engaged and consulted throughout construction to provide advice and review SWMP preparation, erosion and sediment control design, installation, maintenance, and the development of PESCPs.	Pre-construction Construction	Project Manager / Environmental Site Representative	SSD 7348 Development Consent Condition D80 (a) Best Practice
SW3	 EWMSs may be prepared and implemented to manage soil and water impacts that include but are not limited to: Activities assessed as having high environmental risk, Activities that impact on environmentally sensitive areas, Activities that pose a risk to receiving water quality, Earthworks including temporary stockpiling and disposal of excavated material and protocols for the management of contaminated material, Work around drainage lines and where construction water may be discharged into natural waterways, Construction and operation of sediment basins including connecting drainage for the associated catchment area; and drainage works. 	Construction	Project Engineer / Supervisor / Environmental Site Representative	Best Practice
SW4	Contaminated soils and Acid Sulfate Soils and / or Potential Acid Sulfate Soils are to be managed in accordance with the Erosion and Sediment Control Plan, which forms Appendix A of this SWMP.	Pre-construction / Construction	Project Manager / Supervisor / Environmental Site Representative	Managing Urban Stormwater: Soils and Construction Volumes 1 & 2A
Erosion	and sediment control			
SW5	A Primary Erosion and Sediment Control Plan (ESCP) has been prepared by the Soil Conservationist (CPESC) -See Appendix A of this SWMP. The plan includes arrangements for managing wet weather events, including monitoring of potential high-risk events (such as storms) and specific controls and follow-up measures to be applied in wet weather. The Primary Erosion and Sediment Control Plan is to be referred to and considered when preparing progressive erosion and sediment control plans.	Pre-construction and construction	Environmental Site Representative / Project Soil Conservationist	SSD 7348 Development Consent Condition D80 (a) EIS Section 5.2 - Table 27: SEARs reference table & Section 7.1 – Table 43
SW6	Progressive Erosion and Sediment Control Plans (PESCPs) will be prepared and	Pre-construction	Environmental Site	SSD 7348 Development

ID	Measure / Requirement	When to implement	Responsibility	Reference
	implemented in advance of construction. PESCPs will be updated as required.	and construction	Representative / Project Soil Conservationist	Consent Condition D81 EIS Section 5.2 - Table 27: SEARs reference table & Section 7.1 – Table 43
SW7	Prior to the commencement of any construction or other surface disturbance for the development, suitable erosion and sediment control measures to be installed and maintained on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the approved Erosion and Sediment Control Plan included in the CEMP.	Pre-construction / Construction	Project Engineer / Supervisor	SSD 9794683 Development Consent Condition B18 Managing Urban Stormwater: Soils and Construction Volume 1
SW8	Hardstand material, rumble grids or similar will be provided at exit points from construction areas onto public roads to minimise the tracking of soil and particulates onto public roads.	Pre-construction / Construction	Project Engineer / Supervisor	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table, Section 7.1 – Table 43 & Section 7.2
SW9	Site compounds, access tracks, stockpile sites and temporary work areas will be designed and located to minimise erosion.	Pre-construction / Construction	Project Manager / Supervisor / Environmental Site Representative	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table & Section 7.1 – Table 43
SW10	Works will be programmed to minimise the extent and duration of unstabilised soil surfaces.	Pre-construction / Construction	Project Manager / Supervisor / Environmental Site Representative	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table, Section 7.1 – Table 43 & Section 7.2
SW11	Clean and dirty water runoff will be adequately separated to avoid mixing where possible through the use of diversions, clean water drains, and the early installation of permanent drainage infrastructure.	Pre-construction / Construction	Supervisor	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table, Section 7.1 – Table 43 & Section 7.2
SW12	Stabilisation will be implemented for dormant areas exposed for four weeks or more (including stockpiles and batters); by providing soil surface protection (i.e., geotextile fabric, stabilised mulch, soil binder or spray grass)	Construction	Project Engineer / Supervisor	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table, Section 7.1 – Table 43 & Section 7.2

ID	Measure / Requirement	When to implement	Responsibility	Reference
SW13	Drains, banks, or diversions will be formed (and stabilised where required) to direct runoff from disturbed areas to sediment basins or to areas with adequate sediment control devices, and away from watercourses or tributary drainage lines. Lip berms and batter chutes with velocity dams will be progressively formed and maintained on fill formations.	Construction	Project Engineer / Supervisor	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table, Section 7.1 – Table 43 & Section 7.2
SW14	Staged re-vegetation and/or other permanent stabilisation will be implemented in Site areas as work proceeds.	Construction	Project Engineer / Supervisor / Environmental Site Representative	SSD 7348 Development Consent Condition D80 (c) EIS Section 5.2 - Table 27: SEARs reference table, Section 7.1 – Table 43 & Section 7.2
Stockpile	es			
SW15	 Stockpiles will be: located in designated stockpile sites, above 10-year flood levels, located at least 5 m from likely areas of concentrated water flows and drainage lines, Topsoil stockpiles formed to heights to no greater than 2 m, and all other soil materials to be no higher than 5m, and batter slopes to be no steeper than 2:1, established so that any slump of the stockpile will not affect erosion and sediment control measures or infringe on specified minimum clearance requirement, covered or otherwise protected from erosion where stockpiles will be in place for more than 20 days, or temporary stockpiles that are susceptible to wind or water erosion, within 5 days of forming each stockpile. Managed to avoid contamination with noxious weeds and cross-mixing with other stockpiled materials. Weed growth on stockpiles will be monitored and suppressed as required. 	Construction	Project Engineer / Supervisor / Environmental Site Representative	SSD 7348 Development Consent Condition D80 (c) EIS Section 7.2 Managing Urban Stormwater: Soils and Construction Volume 1
Sedimen	t basins			
SW16	Construction sediment basins will be designed and constructed in accordance with the requirements and procedures detailed in the Blue Book Volume's 1 & 2D. The construction sediment basin design/s, restoration and revegetation methodology will be formulated and/or reviewed by the Project Soil Conservationist.	Pre-construction / Construction	Project Soil Conservationist / Supervisor	SSD 7348 Development Consent Condition D81 Managing Urban Stormwater: Soils and Construction Volume 1 & 2D
SW17	All sediment basins will have depth indicators installed that clearly show the sediment storage zone together with basin identification signage basin number.	Construction	Project Engineer / Supervisor / Environmental Site Representative	Managing Urban Stormwater: Soils and Construction Volume 1

ID	Measure / Requirement	When to implement	Responsibility	Reference
SW18	Run-off from areas within catchments (that are controlled by sediment basins) is to be diverted to the sediment basins in stabilised drainage lines where possible.	Construction	Supervisor	SSD 7348 Development Consent Condition D81
				EIS Section 7.2 Managing Urban
				Stormwater: Soils and Construction Volume 1
SW19	Suitable all-weather access will be constructed and maintained to sediment basins to allow for basin testing, treatment, discharge, and maintenance.	Pre-construction / Construction	Project Engineer / Supervisor /	Best Practice
	allow for backing, treatment, algorithms, and maintenance.	, condudation	Environmental Site Representative	Managing Urban Stormwater: Soils and Construction Volume 1
SW20	Water quality basins shall be flocculated with an appropriate approved flocculant (eg. gypsum) using an early dosing system to minimise the settling time of suspended dispersible and small sediment particles and to maximise the efficiency of the basins.	Construction	Supervisor	SSD 7348 Development Consent Condition D81 & D82
	,,,			EIS Section 7.2
				Managing Urban Stormwater: Soils and Construction Volume 1
SW21	Prior to discharging any water from a sediment basin, representative water samples	Construction	Environmental Site	NSW POEO Act 1997
	will be obtained and tested to ensure that it meets the NSW EPA water quality criteria.		Representative / Supervisor	SSD 7348 Development Consent Condition D81 & D82
				SSD 9794683 Development Consent Condition B19
				EIS Section 6.7.4.
				Managing Urban Stormwater: Soils and Construction Volume 1
SW22	Flocculant or coagulant (whether gypsum or another approved material) will be	Construction	Environmental Site	NSW POEO Act 1997
	applied to settle suspended sediments within 24 hours of the conclusion of each rain event causing runoff. The cycle time to treat, dewater and return the maximum storage capacity to any individual construction water quality basin prior to the next rainfall event shall not exceed 5 days.		Representative / Supervisor	SSD 7348 Development Consent Condition D81 & D82
				SSD 9794683 Development Consent Condition B19
				EIS Section 6.7.4. & Section 7.1 – Table 43
				Managing Urban Stormwater: Soils and

ID	Measure / Requirement	When to implement	Responsibility	Reference	
				Construction Volume 1	
SW23	Subsequent to the initial series of basin sample tests, where a statistical correlation can be demonstrated between turbidity and Total Suspended Solids (TSS), an application will be made to the Principal to allow for the discharge of supernatant waters based on turbidity measurements before confirmatory laboratory data is available.	Construction	Environmental Site Representative	Managing Urban Stormwater: Soils and Construction Volume 1	
SW24	A sediment basin management register will be maintained for each sediment basin that records; • personnel approving the dewatering activities, • time & date, • water quality test results and estimated volumes for each discharge.	Construction	Environmental Site Representative / Project Engineer	SSD 7348 Development Consent Condition D81 & D82 Best Practice Managing Urban Stormwater: Soils and	
				Construction Volume 1	
Dewateri	ng				
SW25	Personnel responsible for approval and/or carrying out dewatering activities will be	Construction	Environmental Site	Best Practice	
	adequately trained and inducted on the dewatering procedures and requirements.		Representative / Supervisor	Managing Urban Stormwater: Soils and Construction Volume 1	
SW26	Water to be discharged from site will be discharged in accordance with a Site	Construction	Environmental Site	NSW POEO Act 1997	
	Dewatering Procedure. In accordance with NSW EPA water quality criteria, the water quality parameters for discharge from site discharge points will be:		Representative / Supervisor	SSD 7348 Development Consent Condition D81 & D82	
	Total Suspended Solids <50mg/L			Managing Urban	
	• pH 6.5 - 8.5			Stormwater: Soils and	
	Oil & grease – not visible.			Construction Volume 1	
SW27	A site dewatering register will be maintained for site areas (other than sediment	Pre-construction	Environmental Site	NSW POEO Act 1997	
	basins) that require treatment, dewatering and discharge to off-site areas. The register will record;	/ Construction	Representative / Project Engineer	SSD 7348 Development Consent Condition D81 &	
	dewatering procedure,			D82	
	 date and time for each discharge at each location, 			Managing Urban	
	 water quality test results for each discharge, 			Stormwater: Soils and Construction Volume 1	
	 personnel approving the dewatering activities, 			Construction volume 1	
	 evidence of discharge monitoring, or risk assessment and mitigation measures used to eliminate the risks of pollution or erosion. 				
SW28	Water captured in sediment basins and other site works areas will be reused for dust	Construction	Environmental Site	EIS Section 7.1 – Table 43	
	suppression, compaction, or other construction activities where possible. If a proposed source, other than a town water supply or natural water source, procedures will be developed for regular testing to ensure that the water is suitable for the		Representative / Project Engineer / Supervisor	Managing Urban Stormwater: Soils and	

SW29 All dewatering activities will be subject to prior approval from relevant project personnel. The dewatering activities will be monitored to ensure: intake suction devices are positioned to prevent extraction or disturbance of settled sediments, in on erosion is occurring at discharge locations and/or downstream areas, in on inadvertent or intentional controlled discharge of untreated waters occurs. Site stabilisation and restoration SW30 Management and procedures for site stabilisation will be in accordance with the primary Erosion and Sediment Control Plan at Appendix A of this SWMP. SW31 The rehabilitation of disturbed areas will be undertaken progressively as construction stages are completed and in accordance with procedures detailed in the Blue Book Volume's 1 & 2D. SW32 Restoration of these areas includes; i topsoiling of the areas, seeding, planting, watering, and maintenance, removal of temporary erosion control devices and of accumulated sediments, removal of unused construction materials and waste materials. Spill prevention and response SW33 Management for spill prevention and response will be in accordance with the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP.	ID	Measure / Requirement	When to implement	Responsibility	Reference
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SW30 Management and procedures for site stabilisation will be in accordance with the primary Erosion and Sediment Control Plan at Appendix A of this SWMP. SW31 The rehabilitation of disturbed areas will be undertaken progressively as construction stages are completed and in accordance with procedures detailed in the Blue Book Volume's 1 & 2D. SW32 Restoration of these areas includes; • topsoiling of the areas, • seeding, planting, watering, and maintenance, • removal of temporary erosion control devices and of accumulated sediments, • removal of unused construction materials and waste materials. Spill prevention and response SW33 Management for spill prevention and response will be in accordance with the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. SW34 Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. SW35 Response Procedure has been developed in the CEMP. SW36 Response Procedure has been developed in the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. SW37 Response Procedure has been developed in the CEMP. SW38 Response Procedure has been developed in the CEMP. SW39 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedure has been developed in the CEMP. SW30 Response Procedu	SW29	 personnel. The dewatering activities will be monitored to ensure: intake suction devices are positioned to prevent extraction or disturbance of settled sediments, no erosion is occurring at discharge locations and/or downstream areas, 	Construction	Representative /	SSD 7348 Development Consent Condition D81 & D82 Managing Urban
primary Erosion and Sediment Control Plan at Appendix A of this SWMP. SW31 The rehabilitation of disturbed areas will be undertaken progressively as construction stages are completed and in accordance with procedures detailed in the Blue Book Volume's 1 & 2D. SW32 Restoration of these areas includes; • topsoiling of the areas, • seeding, planting, watering, and maintenance, • removal of temporary erosion control devices and of accumulated sediments, • removal of unused construction materials and waste materials. Spill prevention and response SW33 Management for spill prevention and response will be in accordance with the CEMP. An Emergency Spill Response Procedure has been developed in the CEMP. Post construction / Post construction Post Porject Project Proj	Site stab	oilisation and restoration			
stages are completed and in accordance with procedures detailed in the Blue Book Volume's 1 & 2D. Sw32 Restoration of these areas includes;	SW30		Construction	Project Soil	Managing Urban
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SW33 Management for spill prevention and response will be in accordance with the CEMP. Pre-construction An Emergency Spill Response Procedure has been developed in the CEMP. Pre-construction / Construction / Construction Supervisor / Project Consent Condition D8.	SW32	 topsoiling of the areas, seeding, planting, watering, and maintenance, removal of temporary erosion control devices and of accumulated sediments, 		Representative /	Managing Urban
An Emergency Spill Response Procedure has been developed in the CEMP. / Construction Representative / Supervisor / Project Consent Condition D8.	Spill prev	vention and response			
	SW33			Representative / Supervisor / Project	SSD 7348 Development Consent Condition D82 &
	SW34	Emergency Spill Response Management Procedures (i.e., at compounds). All	Construction	Representative /	NSW POEO Act 1997 SSD 7348 Development Consent Condition D82
SW35 A schedule of all hazardous materials kept on site during construction will be Construction Environmental Site Best Practice Representative / Supervisor	SW35		Construction	Representative /	Best Practice
SW36 The ancillary facilities will be managed within the ESCP. The following measures will Contractor Construction NSW POEO Act 1997	SW36	The ancillary facilities will be managed within the ESCP. The following measures will	Contractor	Construction	NSW POEO Act 1997

ID	Measure / Requirement	When to implement	Responsibility	Reference
	be included to limit sediment and other contaminations entering receiving waterways:			SSD 7348 Development
	 Chemicals will be stored within a sealed or bunded area not within 5 m of any aquatic habitat, any areas of concentrated water flow, flood prone or poorly drained areas, or on slopes steeper than 1:10 Vehicle movements will be restricted to designated pathways where feasible and appropriate controls will be in place where plant is stored Areas that will be exposed for extended periods, such as car parks and main access roads, will be stabilised where feasible. 			Consent Condition D82 & D110
SW37	All spills and associated environmental incidents are to be reported in accordance with the CEMP, and where applicable, in accordance with Section 148 of the NSW POEO Act 1997.	Construction	Environmental Site Representative / Supervisor	NSW POEO Act 1997
Monitori	ng and inspections			
SW38	Nominated project personnel will conduct site inspections of erosion and	Construction	Environmental Site	EIS Section 7.2
	sedimentation controls at least weekly.		Representative / Supervisor	Managing Urban Stormwater: Soils and Construction Volume 1
SW39	All disturbed areas, revegetated/stabilised areas and all permanent and temporary	Construction	Environmental Site Representative / Supervisor	EIS Section 7.2
	erosion and sediment control works will be inspected:			Managing Urban Stormwater: Soils and Construction Volume 1
	At least weekly			
	 Immediately before extended site shut down 			
	 At the conclusion of all rainfall events exceeding 10mm and during periods of prolonged rainfall as soon as practicable. 			
SW40	Any rectification measures which are identified will be addressed and / or recorded to	Construction	Environmental Site	EIS Section 7.2
	ensure appropriate rectification within the nominated timeframe. The timeframe for rectification works is based on a risk assessment of deficiencies in controls, being;		Representative / Supervisor	Managing Urban
	High: within 24 hours of inspection,		Supervisor	Stormwater: Soils and Construction Volume 1
	Medium: within 3 working days of inspection; and			Condition volume 1
	Low: within 3 working days of inspection.			
SW41	Monitoring of rainfall events (with observations of rainfall in millilitres) will be	Construction	Environmental Site	Best Practice
UVV41	undertaken daily during normal workdays.	Construction	Representative	Managing Urban
			·	Stormwater: Soils and Construction Volume 1

7 COMPLIANCE MANAGEMENT

7.1 Roles and responsibilities

The Contractor's Project Team's organisational structure and overall roles and responsibilities are outlined in CEMP. Specific responsibilities for the implementation of environmental controls are detailed in Section 6 of this Plan.

7.2 Training

All employees, contractors and utility staff working on site will undergo site induction training relating to soil and water management issues. The induction training will address elements including:

- Existence and requirements of this sub-plan.
- Relevant legislation.
- · Incident response, management, and reporting.
- Roles and responsibilities for soil and water management.
- Water quality management and protection measures.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in soil and water management. Examples of training topics include:

- ERSED control installation methodology.
- Sediment basin construction.
- Sediment basin operation.
- Sediment basin maintenance.
- · Working near or in drainage lines.
- Emergency response measures in high rainfall events.
- · Preparedness for high rainfall events.
- Lessons learnt from incidents and other event e.g., high rainfall/flooding.
- Spill response.
- Stockpile location criteria.

Further details regarding staff induction and training are outlined in the CEMP.

7.3 Monitoring and inspection

Regular monitoring and inspections will be undertaken during construction. Monitoring and inspections will include, but not be limited to:

- Immediate areas and drainage lines adjacent to the Project area
- Construction sediment basin water quality prior to discharge.
- Weekly and post rainfall inspections to evaluate the effectiveness of erosion and sediment controls measures in accordance with Table 6-1.

Table 7-3 Inspection Schedule

Activity	Frequency	Location	Responsibility	Record
Environmental Site Inspection	Weekly	Site wide	Environmental Site Representative	Site inspection log
Rainfall Inspection (10mm or greater rainfall).	Prior to rainfall event, during event, within 24 hours after the event	Site wide	Environmental Site Representative	Site inspection log

Additional requirements and responsibilities in relation to inspections, in addition to those in Table 6-1, are documented in the CEMP.

7.4 Licences and permits

The water quality discharge criteria for the project are listed below, in Table 7-4.

Table 7-4 Discharge water quality criteria

Parameter	Criteria	Sampling method	Frequency
рН	6.5 –8.5	Probe	Daily during any discharge
Turbidity	TBA following correlation with TSS results	Probe or Grab Sample	Likely to be required daily during any discharge
Total Suspended Solids*	50 mg/L	Grab Sample	Daily during any discharge
Oil and Grease*	No visible	Visual inspection	Daily during any discharge

Any other relevant licences or permits will be obtained in the lead up to and during construction as required.

7.5 Weather monitoring

A rain gauge to be installed in the main compound will be used in the monitoring of rainfall events. The Wet Weather Contingency Procedure is detailed in the Project ESCP at Annexure E.

7.6 Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental mitigation and management measures, compliance with this plan and other relevant approvals, licences and guidelines. Audit requirements are detailed in the CEMP.

7.7 Reporting

Reporting requirements and responsibilities are documented in the CEMP.

8 REVIEW AND IMPROVEMENT

8.1 Continuous improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Develop and implement a plan of corrective and preventative action to address any nonconformances and deficiencies.
- Verify the effectiveness of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Make comparisons with objectives and targets.

8.2 SWMP update and amendment

The processes described in the CEMP may result in the need to update or revise this Plan. This will occur as needed.

Any revisions to the SWMP will be in accordance with the process outlined in the CEMP.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure located within the CEMP.

Appendix AErosion and Sediment Control Plan

APPENDIX Ja

Erosion and Sediment Control Plan



PROPOSED INDUSTRIAL DEVELOPMENT – OAKDALE WEST ESTATE – BUILDING 2C & 2D

EROSION AND SEDIMENT CONTROL PLAN

March 2022 - Revision 0

Prepared for:



Prepared by:

ANDREW LITTLEWOOD

CPESC & Senior Soil Conservationist



Document Status

Rev No.	Date	Revision	Prepared by	Reviewed		Approved	
		Description		Name	Date	Name	Date
0	18/03/2022	Revision 0	A Littlewood				

Document Authorship Information

Project	Proposed Industrial Development – Oakdale West Estate – Building 2C & 2D, Lot 107 DP 1262310		
Document	Erosion and Sediment Control Plan – Construction of Building 2C & 2D		
Document Author	Andrew Littlewood – Senior Soil Conservationist		
Qualification	Certified Professional in Erosion and Sediment Control (CPESC No. 5988).		
Relevant Training	SEEC and IECA (Australasia) – 'Water Management on Construction sites' &		
	'Preparing and Reviewing Plans for Soil and Water Management' – 2009		
	University of Western Sydney and Hawkesbury Global Ltd - Certificate of		
	Attainment in Soil and Water Management for Urban Development - 2000		
Experience – Years	22 years (2000 – 2022)		
Current Employment	Director & Principal - Rubicon Enviro Pty Ltd (2016-2022)		
Previous Employment	Senior Soil Conservationist & CPESC – TREES Pty Ltd (2008-2016)		
Previous Employment	Erosion and Sediment Control Officer - Lake Macquarie City Council (2000 – 2007)		
Professional Affiliations	Member of International Erosion Control Association (Australasia)		

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Oakdale West Estate: Building 2C & 2D – Erosion and Sediment Control Plan

1 Introduction

This Primary Erosion and Sediment Control Plan (Sub-plan) has been prepared as Appendix A in accordance with the Project Soil and Water Management Plan (SWMP).

The Sub-plan has been prepared to reduce the potential for risk of environmental impacts caused by erosion and sedimentation associated with project activities.

2 Purpose

The purpose of this Sub-plan is to outline the planning, methodologies, techniques and monitoring to minimise the potential environmental impacts of erosion and sedimentation arising from the Project construction activities.

3 Scope

The scope of the Primary ESCP will;

- Provide a strategy and framework for construction to be planned, implemented and maintained to mitigate any adverse environmental impacts,
- Propose control measures and management procedures to be implemented during construction, to avoid or minimise potential adverse impacts to soils, surface water and groundwater,

This Primary ESCP has been prepared in accordance with the requirements of the 'Blue Book' being a collective of:

- Managing Urban Stormwater: Soils and Construction 4th Edition Volume 1 Landcom, reprinted 2006
- Volume 2A: Installation of Services NSW Department of Environment & Climate Change (DECC), 2007

4 Objectives

The key objectives of the Primary ESCP is to;

- Identify potential impacts to soil and water quality such as erosion and sedimentation arising from construction activities.
- Outline the soil and water management strategy for the construction phase of the development,
- Promote the adoption of sound principles and criteria for planning and implementation of erosion and sediment controls,
- Ensure the design and construction of controls is undertaken in accordance with the relevant guidelines,
- Minimise the adverse risks to soils and water by detailing mitigation measures and strategies,
- Provide an outline of a monitoring, inspection and reporting framework for the ongoing assessment of adherence to the ESCP.

5 Performance Criteria & SSD Development Approval Condition Compliance

The performance criteria for the ESCP are to:

- Limit potential for adverse environmental impacts on downstream waterways, riparian zones, and other identified sensitive areas,
- Minimise the risk and subsequent occurrence of erosion and sedimentation, to mitigate the impacts on project areas, sensitive areas, and downstream environments,
- Prevent the occurrence of pollution incidents causing environmental harm,
- Maintain existing downstream waterway attributes and water quality parameters,

Oakdale West Estate: Building 2C & 2D - Erosion and Sediment Control Plan

- Manage erosion and sedimentation with sound management practices of effective planning and formation of relevant controls
- Ensure compliance with legislative & regulatory requirements, and to maintain liaison and communication with statutory authorities and/or delegates.

5.2 SSD Development Approval Condition Compliance

The following table details this ESCP's compliance with the State Significant Development (SSD) Consent Condition requirements for SSD 7348 Development Consent – Mod 1-9.

Table 5.2.1

SSD 7348 Development Consent Condition	ESCP Section & Page
D80(a) – 'Erosion and Sediment Control Plan must be prepared by a suitably qualified and experienced person(s);'	See 'Document Authorship Information' – Page 2
D80(b) – 'Erosion and Sediment Control Plan mustbe generally consistent with the Erosion and Sediment Control Plans in the RTS and those prepared by the contractor for each sequence of the works, as approved by the PCA.'	See Section 3 - 'Scope of ESCP' – Page 4. The ESCP has been prepared in accordance with the requirements of the Managing Urban Stormwater - Soils and Construction 4th Edition, Volumes 1 & 2A, known as the 'Blue Book'
D80(c) – 'Erosion and Sediment Control Plan must include detailed erosion and sediment controls developed in accordance with the relevant requirements of Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline;'	 See Section 8 – 'Erosion Control Measures and Sediment Control Methods' – Table 8 – Page 10, and; See Section 9 – 'Soil & Water Management Activities & Controls' Table 9 – Page 13
D80(d) – 'Erosion and Sediment Control Plan must include procedures for maintaining erosion and sediment controls in efficient working order for the duration of construction, to ensure Stage 1 complies with Condition D82.	 See Section 7.6 'Erosion and Sediment Control Training for Site Personnel' – Page 8, and; See Section 7.7 'Inspection and Maintenance' – Page 8

The following table details this ESCP's compliance with the SSD Consent Condition requirements for SSD 9794683 Development Consent – Oakdale West Stage 3 Development.

Table 5.2.2

SSD 9794683 Development Consent Condition	ESCP Section & Page
B18 - Prior to the commencement of any construction or other surface disturbance for the development, the Applicant must install and maintain suitable erosion and sediment control measures on-site, in accordance with the relevant requirements of the Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004) guideline and the Erosion and Sediment Control Plan included in the CEMP required by condition C2.	See Section 7.1 – 'Construction Activities – Page 6 See Section 7.4 – Key Management Strategies – Page 7 See Section 9 – 'Soil & Water Management Activities & Controls' – Table 9 – Section 1 & 2
B19 – 'The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters, except as expressly provided for in an EPL.	See ESCP Appendix C – 'Sediment Basin Management & Dewatering Procedure'
B30 – 'The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.'	See Section 9 – 'Soil & Water Management Activities & Controls' – Table 9 – Section 2
B31 - During construction of the development, the Applicant must comply with the dust minimisation measures detailed in the Construction Environmental Management Plan required by Condition C2.	See Section 9 – 'Soil & Water Management Activities & Controls' – Table 9 – Section 2

6. Guidelines, Standards and Procedures

Name of Document/Publication	Author	Published
Acid Sulfate Soil Manual	ASSMAC	1998
Approved Methods for the Sampling and Analysis of Water Pollutants in NSW	NSW EPA	2004
Australian and New Zealand Guidelines for Fresh and Marine Water Quality	ANZECC and ARMCANZ	2000
Bunding & Spill Management	NSW DEC	1997
Environmental Best Management Practice Guideline for Concreting Contractors	NSW DEC	2004
Guidelines for the Management of Acid Sulphate materials: Acid Sulphate Soils, Acid Sulphate Rock and Monosulphidic Black Ooze	NSW RTA	2005
Guideline for Environmental Management - Spraying Bituminous Materials	VIC EPA	2002
Guideline for Handling Liquids	NSW DECCW	2007
Managing Urban Stormwater ('Blue Book'): Soils and Construction Volume 1, 4 th Edition	NSW Landcom	2004
'Blue Book' - Volume 2A Installation of Services	NSW DECCW	2008
Noxious and environmental weed control handbook	NSW DPI	2014
Table Drains - Erosion Control Guideline	Brisbane City Council	2001

7. Environmental Planning

Erosion and sediment control planning is based on the principle that preventing erosion where possible provides the best environmental outcomes, is more economical, and effective than controlling the capture of sediment. This is a significant goal, given the Project topography, drainage patterns and soils that have a significant proportion of sodic soils that are highly erodible.

7.1 Construction Activities

The scope and anticipated duration of the Project works present risks of environmental impacts to the environment. Key aspects of the project that could result in adverse impacts to soils and water include:

- Installation of preliminary erosion and sediment controls and establishment of off-site water diversions.
- Establishment of compounds, exclusion zones, stockpile areas, and soils treatment area/s.
- Minor earthworks, site preparation and site access/temporary access roads.
- Trenching and earthworks for service installation.
- In-situ concrete works and concrete curing.
- · Asphalt paving activities.
- Operation of internal haulage and access routes.
- Stormwater construction and drainage stabilisation, including temporary sediment basins.
- Dewatering 'dirty' water from site areas and sediment basin operations

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- Importing, handling, stockpiling and transporting materials & resources.
- Compound operation including fuel and chemical storage, refuelling and chemical handling.
- Storage of chemicals, fuels & oils.
- Spills & leaks of fuels & oils from mobile and static machinery.
- Plant maintenance.
- · Generation of building and construction waste
- General putrescible waste from compound/s & works areas
- Noxious weed treatment including herbicide spraying.
- · Topsoil replacement, revegetation, and landscaping
- Landscaping.

7.2 Impacts

The possible impacts on soil and water from the activities described include;

- Unnecessary disturbance of existing areas outside the Project footprint,
- Erosion of soils that degrade the water quality of runoff to downstream receivers, dependant flora and fauna, and sensitive areas,
- Degraded soil or water quality from exposure to contaminated soils or ASS material, or runoff from these soils,
- Contamination of soils, and surface and groundwater from accidental spills or oil leaks
- Disturbance or degradation of groundwater aquifers,
- Litter and gross pollutants from construction activities
- Atmospheric dust pollution affecting air quality of areas surrounding the Project.

7.3 'Blue Book' receiving waters classification

The recommended minimum design criteria for temporary erosion and sediment control measures are based upon an assessment of the sensitivity of receiving environments. Reference to Project EISs describes the surrounding environmental sensitivity and land uses. In accordance with the REF and SWMP assessment, the attributes of the receiving waters in the vicinity of the Project have been assessed as 'standard' in accordance with Blue Book Volume 1- Sect. 6.3.4 – (f) & Volume 2D – Table 6.1. however, we have elected to adopt the 5-day - 85th percentile rainfall depth for Blacktown of 32.2mm.

7.4 Key Management Strategies

The following list outlines the Key Management Strategies that will be implemented to mitigate potential erosion and sediment impacts;

- Specialist expertise and advice will be sought from an accredited Project Soil Conservationist
 (CPESC) in regard to the broad spectrum of erosion and sediment control issues, including but not
 limited to site establishment, temporary access routes, off-site water diversion, on-site drainage,
 sediment basin construction/operation/decommissioning, soil handling and storage, water
 management, stabilisation and rehabilitation/revegetation of Project areas.
- Implementation of structured erosion and sediment control training program for all relevant site personnel in the form of inductions, toolbox talks and workshops/training presentations.
- Minimising the extent and duration of construction disturbance.
- Control and diversion of off-site water flows around or across site.
- Control and diversion of on-site flows to installed sediment controls and sediment basins.
- Conservation of topsoils for site rehabilitation and revegetation.
- Implementation of progressive erosion methods & techniques throughout various work stages.

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- Construction and management of suitable sediment controls including sediment filters, traps, sumps and basins.
- A thorough inspection and maintenance program to monitor, record and schedule actions for maintenance and upgrades of controls, rectification works, and sediment removal and handling.
- Establishing a procedure to monitor forecast weather events and implementing response plans for significant wind or rainfall events and flooding.
- Timely and progressive stabilisation of disturbed areas prior to final landscaping.
- Monitoring stabilisation measures and promoting prompt & effective revegetation and permanent stabilisation.

7.5 Preparation of Progressive Erosion and Sediment Control Plans (PESCP's)

This ESCP will be supplemented with Progressive Erosion and Sediment Control Plans (PESCP's) prepared as required for the relevant work areas. The PESCP's illustrate the strategy for erosion and sediment control and provides detail on structures and controls to be implemented in concert with construction activities. The PESCP's will outline structural and non-structural measures to:

- Intercept and divert clean water runoff around worksites
- Prevent erosion
- Limit the movement of sediment
- Remove or filter sediment from runoff
- Detain or control the discharge of runoff from site
- Promote timely rehabilitation or stabilisation of disturbed areas.

There are a number of control measure options available for selection and use. The selection of controls will be in accordance with sound management practices to achieve the desired outcomes.

The PESCP's will be revised as necessary to address changes in the site conditions and nature of works. The PESCP's will be formulated in conjunction with construction personnel prior to the commencement of specific onsite activities. The plans will be prepared to manage the various works or construction stages such as:

- Compound, access, stockpile operations, and construction facilities
- Bulk earthworks for road formation, drainage, services, etc.
- Major off-site and on-site water drainage works or structures such as diversions, drains and treatment/sediment basins
- Construction activities such as paving, kerbing/guttering, stormwater drainage and outlets, etc.
- Stabilisation of disturbed areas, access and works areas, and perimeter areas
- Decommissioning of temporary erosion and sediment controls.

The formulation of Environmental Work Method Statements (EWMS) will be sub-ordinate to the requirements of the primary ESCP, supplement the PESCP's, and will outline methods and strategies for works in critical areas such as clearing & grubbing, topsoil stripping & earthworks, works around watercourses & culvert works, construction & operation of sediment basins, drainage works and dewatering.

7.6 Erosion and Sediment Control Training for Site Personnel

Prior to the commencement of onsite activities, all site personnel will be instructed to observe site constraints and be made aware of environmental controls, in particular;

- Avoidance of disturbing or damaging 'No-Go' zones
- Effects of erosion and sedimentation and off-site or downstream impacts
- Environmental legislation, responsibilities, and 'due diligence'
- Correct establishment and maintenance of erosion and sediment controls
- 'End-of-day' site maintenance, emergency procedures, and spill response
- Personnel to monitor, review and improve controls as appropriate.

Key construction personnel would undertake additional environmental training including a specific training session for erosion and sediment control addressing:

- Environmental impacts
- Relevant legislation
- Principles and techniques of erosion and sediment control
- Preparation of PESCP's.

The structure and content of the Erosion and Sediment Control training would be developed in conjunction with Project management and construction personnel.

7.7 Inspection and Maintenance

A self-auditing program will be established for erosion and sediment control based on a check sheet developed for the site. A site inspection using the developed check sheet will be undertaken by relevant Project personnel:

- At least weekly
- Immediately before extended site shut down
- At the conclusion of all rainfall events exceeding 10mm and during periods of prolonged rainfall as soon as practicable).

The self-audit will include:

- Noting the condition of installed erosion and sediment controls onsite
- · Detailing maintenance requirements (if any) for installed erosion and sediment controls
- Recording the volumes of sediment removed from sediment controls and sediment traps, where applicable
- Recording the location to where extracted sediments are disposed.

8. Erosion Control Measures and Sediment Control Methods

The formulation of the ESCP is based on the assumption that controls will generally be installed in the following progression;

- Installation of preliminary erosion and sediment controls and exclusion fencing to nominated areas of initial works and establishing exclusion zones
- Establishing any temporary roads and machinery access points in addition to those existing
- Installation of stabilised site access, site compound and facilities
- Forming temporary drains or banks to maximise diversion of off-site flows away from works area to watercourses, existing drainage lines or to temporary drainage diversion structures
- Construction of on-site water diversion drains or banks to direct runoff to the installed sediment controls

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- Installation of diversion drains/banks upslope and sediment controls down slope of proposed topsoil and spoil stockpile areas
- Bulk earthworks such as cut excavations, filling, trenching, and engineered formation are controlled with a suite of erosion controls such as exclusion bunding, surface stabilisation treatments, trench stops, batter berms/chutes, contour banks, check dams, etc.
- Drainage and run-off from site areas directed to adequately designed and constructed sediment controls with regular maintenance and repair as required
- Completed areas are progressively stabilised as soon as practical with emphasis on critical areas such as drainage outlets, batters, etc.
- Sediment controls are to be maintained until adequate soil surface protection levels (>70% ground cover) are achieved in the catchment.

The erosion and sediment control measures required for Project areas during the various construction areas will be determined by reference to the guidance and measures detailed in the 'Blue Book' - Volume 2A: 'Installation of Services' – NSW Department of Environment & Climate Change (DECC), 2007. Commonly employed methods and techniques that may be likely to be utilised on the Project are detailed in the following table;

Table 8

Erosion Control – Raindrop Impact				
Situation	Control measure or method			
Soil surface protection - Vegetation	 Temporary vegetation (cover crop only) Permanent vegetation – introduced (exotic) pasture species or native (endemic) species 			
Soil surface protection - Batter protection	 Organic rolled erosion control products (RECP's) such as jute mesh, jute mat, coir fibre blankets Non-organic RECP's such as non-woven geotextile membrane or heavy grade plastic sheeting. 			
Soil surface protection - Mulching	 Hydromulch or hydraulic bonded-fibre matrix Straw mulching with bitumen tack Rock or gravel mulch 			
Soil surface protection - geobinders	Organic tackifiersCo-polymer emulsionsBitumen emulsion			
Erosion control - Concentrated Wa	ter Flow			
Up-slope diversions	Excavated channel-type bankBack push-type bank or windrowCatch drains			
Soft armour channels	 Trapezoidal or parabolic shape design drain cross sections Organic rolled erosion control products (RECP's) such as jute mesh, jute mat, coir fibre blankets Non-organic RECP's such as non-woven geotextile membrane or heavy grade plastic sheeting Organic tackifiers & co-polymer emulsions Bitumen emulsion Hydro mulch Standard or reinforced turf 			

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Situation	Control measure or method
Hard armour channels	Loose rock – hard quarry rock
	Rock-filled wire mattresses
	Grouted rock
	Cast in-situ concrete
	Underlays utilising heavy grade plastic lining or geotextile lining
Check dams	Stacked rock
	Sandbags and aggregate filter bags
	Geotextile covered straw bales
	Coir logs
Batter drainage	Geotextile lined or heavy grade plastic chutes
	Pipes and Half pipes
	Loose-rock rip rap
	Concrete (pre-cast or on-site)
	Rock-filled wire mattresses
Grade control structures and	Geotextile lined or heavy grade plastic chutes
flumes	Pipes and Half pipes
	Concrete chutes
	Loose-rock rip rap
	Gully pits and field inlets
	Sandbag drop structures
	Rock-filled wire gabions and mattress structures
Outlet dissipation structures	Loose-rock rip-rap apron diffusers
•	Rock-filled wire mattresses
	Pinned geotextile aprons
	Level spreaders
Revetments and retaining walls	Rip rap
C	Rock-filled wire gabions and mattresses
Sediment control - Sheet Flows	<u> </u>
Vegetative filters	Turf strips
Sediment barriers/filters	Sediment fencing
	Topsoil berms stabilised with vegetation or geotextile with filter outlets at intervals
	Excavated and geotextile lined sediment traps
	Geotextile/ shade cloth covered rock or gravel windrows
	Coir logs
Site exit points	Shaker grids with paved or rock aprons and sediment sumps
	Wheel wash equipment and designated/controlled areas
Sediment control - Concentrated	
Sediment traps	Sediment basins
·	Stacked rock with geotextile
	Excavated and geotextile lined sediment traps
	Straw bale or sand bag structures
	Gully pit, field inlet and kerb inlet traps
	1 ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '

9 Soil & Water Management Activities & Controls

The following table outlines the environmental management and mitigation measures proposed to be implemented, together with responsibilities and frequency of actions;

Table 9

1.	1. Planning, permits & personnel			
	Environmental Management Controls	Person Responsible	Timing / Frequency	
1.	All necessary licences, permits and approvals required by legislation will be obtained prior to works commencing.	Project Manager / Supervisor / Environmental Site Representative	Duration	
2.	Copies of any relevant licences, permits and approvals will be kept on site for inspection upon request or otherwise, as required.	Project Manager / Supervisor / Environmental Site Representative	Site establishment	
3.	All works and site activities will comply with the explicit requirements of any relevant licence, permit or approval.	Project Manager / Supervisor / Environmental Site Representative	Duration	
4.	Recordings and data from site inspections, testing, audits, and monitoring will be retained, with associated documentation maintained to demonstrate remedial action/s have occurred.	Project Manager / Supervisor / Environmental Site Representative	Duration	
5.	Erosion and sediment control planning and implementation is required prior to the commencement of works. The approved CEMP & SWMP is supplemented by concept Progressive Erosion & Sediment Control Plans (PESCP's) which have been developed in accordance with the requirements of 'Soils and Construction: Managing Urban Stormwater' 4th Edition Landcom 2004.	Project Manager / Supervisor / Environmental Site Representative	Site establishment & duration	
6.	The CEMP & SWMP & construction PESCP's may be supplemented by site-specific Environmental Management Plans (EMP's) which would be developed in response to a significant environmental issue emerging. The EMP's would outline the relevant environmental risks and issues, mitigation of potential risks, and detail strategies for remediation and/or management.	Project Manager / Supervisor / Environmental Site Representative	Site establishment & duration	
7.	The induction of employees and contractors to include a component promoting environmental awareness, legislative requirements & penalties, and basic erosion and sediment control tasks	Project Manager / Supervisor / Environmental Site Representative	Site establishment & duration	
8.	Toolbox talks will regularly focus on specific works, associated risks, potential impacts and mitigation measures. Specific erosion and sediment control awareness training and workshops will be undertaken by personnel with direct involvement with erosion and sediment control.	Supervisor / Environmental Site Representative	Site establishment & duration	
9.	Promote planning for seasonal restrictions for high-risk areas and/or activities ((i.e., late summer/autumn rainfall events for culvert works or cold winter temperatures affecting revegetation)	Project Manager / Supervisor / Environmental Site Representative	Site establishment & duration	

2.	Site establishment, stockpiling and bulk earthworks		
	Environmental Management Controls	Person Responsible	Timing / Frequency
1.	Exclusion areas ('No Go' zones) to be identified, delineated where practical, and personnel instructed to avoid disturbance in these areas.	Supervisor / Environmental Site Representative	Site establishment
2.	Temporary fencing or barricading such as parawebbing or perimeter tape is to be utilised on the perimeter with accompanying signage as required.	Supervisor / Environmental Site Representative	Site establishment
3.	Areas of proposed works with identified noxious weed infestations to be treated with appropriate herbicide, in accordance with product directions. The weed treatment will occur in sufficient time prior to disturbance to ensure complete 'die back' prior to topsoil handling.	Supervisor / Environmental Site Representative	Site establishment
4.	In areas requiring weed control, spray drift will be mitigated by conducting spraying activities in calm weather and application by hand sprayer unit where practical.	Supervisor / Environmental Site Representative	Site establishment
5.	The extent of earthworks and formation stripping will be demarcated to the footprint necessary for the proposed works. Disturbance outside the earthworks footprint will be limited to necessary operations such as stockpiling, lay downs, etc.	Supervisor / Environmental Site Representative	Site establishment & duration
6.	Early establishment of suitable stockpiling and processing areas to reduce unnecessary soil disturbance from double handling of soil by machinery in the early works phase.	Supervisor / Environmental Site Representative	Site establishment & duration
7.	The installation of preliminary sediment controls such as perimeter sediment fencing, excavated sediment traps, check dams, coir log/straw bale filters, etc, will be implemented prior to disturbance within the catchment.	Supervisor / Environmental Site Representative	Site establishment
8.	Construct erosion resistant access routes, site access/egress points, and compound roads to be formed and stabilised as early works. Car parking areas and frequently utilised areas should be stabilised (e.g. geotextile with asphaltic millings, rock aggregate overlay, bitumen chip seal or similar) to prevent soil churning, where required. Any rock or aggregate required for vehicle access should be clean and free from soil or other contaminants.	Supervisor / Environmental Site Representative	Site establishment & duration
9.	Temporary drains, banks or diversions are to be formed and stabilised to divert concentrated 'clean' flows around disturbed works areas.	Supervisor / Environmental Site Representative	Site establishment & duration
10.	The stockpile locations are to avoid concentrated surface flows or areas subject to inundation during wet weather.	Supervisor / Environmental Site Representative	Site establishment & duration
11.	Temporary stockpiles are to be covered for the duration of high winds, rainfall and/or storm conditions. Long term stockpiles to be cover crop seeded as appropriate to the season.	Supervisor / Environmental Site Representative	Site establishment & duration
12.	The long-term soil stockpile locations are to be located away from major drainage lines, and 5 metres from any waterway. The stockpiles will not be established in areas subject to concentrated surface flows, waterlogging or prolonged inundation during wet weather.	Supervisor / Environmental Site Representative	Site establishment & duration

Environmental Management Controls	Person Responsible	Timing / Frequency
13. Stockpiles should be stabilised if they are to remain in place for more than 20 days. Rolled Erosion Control Products (RECP's such as geotextile, jute mesh, coco fibre mat, etc) or soil binders can be used on smaller stockpiles, however, larger stockpiles should be formed into crowned structures to minimise erosion and be subsequently stabilised with cover crop seeding or applied geobinders. Plastic covers should only be utilised for short term cover for wind or storm protection.	Supervisor / Environmental Site Representative	Site establishment & duration
14. The use of existing, available materials on-site (i.e. soils, rock, mulch etc) to be salvaged and stored where it can be utilised for temporary or permanent works (where practical) to reduce import requirements.	Supervisor / Environmental Site Representative	Site establishment & duration
15. Prioritise planning for early and rapid cut-to-fill earthworks in periods of seasonal risk and/or other high-risk areas.	Supervisor / Environmental Site Representative	Site establishment & duration
16. Where practical, cut earthworks should be staged from the upslope approaches to control dirty water within the excavation (i.e. the excavation proceeds downslope whilst maintaining unexcavated remnant earth as a control bund)	Supervisor / Environmental Site Representative	Site establishment & duration
17. Subgrade excavations and engineered fill formations at risk of temporary inundation during flood events may be stabilised with moisture-repelling soil binders.	Supervisor / Environmental Site Representative	Duration
18. As the earthworks progress, areas of fill should generally be graded to shed flows away from the edges of fill batters to sediment controls where possible	Supervisor / Environmental Site Representative	Duration
19. Progressively form and maintain lip berms and batter chutes with velocity dams on fill batter formations	Supervisor / Environmental Site Representative	Duration
Maintain minor benches or contour berms on fill batter formations until profiling for topsoiling is imminent	Supervisor / Environmental Site Representative	Duration
21. Temporary scour protection lining for major 'dirty' drains for steep or long drains to sediment basins or other controls.	Supervisor / Environmental Site Representative	Duration
22. Access to the works area, and movements on the site during construction will be limited to the defined access and project areas, where possible. Minimise vehicle movements & speed on unsealed areas and access tracks.	Supervisor / Environmental Site Representative	Duration
23. Earthworks and hauling, and vehicular movements to be limited in wet conditions.	Supervisor / Environmental Site Representative	Duration
24. Appropriate sediment tracking controls such as an aggregate/geotextile apron, shaker grid, etc will be installed at exit points from the site, where required.	Supervisor / Environmental Site Representative	Duration
25. The adjoining local road network to be regularly monitored for tracked sediments with affected areas cleaned as soon as possible in a safe manner.	Supervisor / Environmental Site Representative	Duration

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	Environmental Management Controls	Person Responsible	Timing / Frequency
26.	Vehicles transporting bulk materials such as soils and fill are to correctly cover loads to prevent loss of load and/or dust generation on public roads.	Supervisor / Environmental Site Representative	Duration
27.	Imported quarry product and fill materials required for construction are to be clean, and free of contaminants (ie. weeds, waste, liquids, etc).	Supervisor / Environmental Site Representative	Duration
28.	Bunded or controlled areas for re-fueling, material stockpiling, (and contaminated soil treatment area if required) are to be formed prior to commencement of those works in the relevant risk areas.	Supervisor / Environmental Site Representative	Site establishment & duration
29.	Water carts are to regularly spray access tracks, works areas, & temporary stockpiles, during dry weather conditions.	Supervisor / Environmental Site Representative	Duration
30.	Bunded or controlled areas for re-fuelling, material stockpiling, (and contaminated soil treatment area if required) are to be formed prior to commencement of those works in the relevant risk areas.	Supervisor / Environmental Site Representative	Site establishment & duration
31.	The progress of earthworks will minimise slope lengths and gradients where practical utilising contour berms, batter berms, diversion banks, etc.	Supervisor / Environmental Site Representative	Duration
32.	Personnel to ensure visual dust monitoring is maintained during works, and dust suppression is undertaken regularly.	Supervisor / Environmental Site Representative	Duration
33.	Minimise earthworks, soil handling and general disturbance during periods of strong and/or gusty winds.	Supervisor / Environmental Site Representative	Duration
34.	Apply water sprays for dust suppression where earthworks, soil handling, rock saw cutting and/or potentially contaminated soils are generating dust.	Supervisor / Environmental Site Representative	Duration
3.	Drainage and water management		
1.	Works for high-risk activities are to be conducted in low rainfall periods, supported by positive 3-day weather forecasts for the anticipated scope of works.	Supervisor / Environmental Site Representative	Duration
2.	Construct diversion drains or banks upslope of proposed works to direct off-site water flows to existing drainage or adequately stable vegetated areas.	Supervisor / Environmental Site Representative	Duration
3.	Immediately line any constructed off-site water diversion with appropriate RECP's, OFM's and/or geobinders. Temporary spillways and associated structures to be suitably stabilised for the volume and turbulence of flows.	Supervisor / Environmental Site Representative	Duration
4.	Sheet flows in work areas have erosion measures such as surface roughening, scribed drains and/or contour banks to reduce slope lengths. Flows from diversions to have velocities controlled and directed to sediment controls.	Supervisor / Environmental Site Representative	Duration
5.	Temporary 'dirty' water drainage will be adjusted progressively to maximise flows to sediment filters and traps.	Supervisor / Environmental Site Representative	Duration
6.	Permanent storm water drains, and outlet structures will be stabilised as soon as possible following completion.	Supervisor / Environmental Site Representative	Duration

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	Environmental Management Controls	Person Responsible	Timing / Frequency
7.	Check dams are to be constructed from geotextile/aggregate bags, sandbags, staked coir logs/straw bales or geotextile/rock formations to reduce flow velocities in unlined drains and other areas of concentrated flow (i.e. against diversion banks). Check dams are to be installed at the required intervals in drains with the frequency of the dams increasing as the grade increases	Supervisor / Environmental Site Representative	Duration
8.	Trenching works on grade will be controlled with methods detailed in the 'Blue Book' – Volume 2A' - Section 6	Supervisor / Environmental Site Representative	Duration
9.	Flooded excavations, ponded water, etc will be extracted as required and utilised for site purposes or treated to achieve acceptable water quality prior to discharge.	Supervisor / Environmental Site Representative	Duration
10.	Flooded excavations and groundwater encountered in ASS areas or potentially contaminated areas will be tested and assessed prior to being extracted for treatment & subsequent discharge or conveyed to a licensed liquid waste facility.	Supervisor / Environmental Site Representative	Duration
11.	Site water that is to be discharged directly to a flow line, drain, watercourse, etc, will be tested, treated, and recorded prior to discharge.	Supervisor / Environmental Site Representative	Duration
12.	Water quality should meet the following proposed minimum criteria prior to discharge to any waterway or drainage line: Total suspended solids (TSS) – less than 50 mg/L pH – 6.5 to 8.5 oil and grease – not visible and less than 10 mg/L	Supervisor / Environmental Site Representative	Duration
13.	Dewatering devices or transfer pumps will be positioned to ensure that settled sediments are not disturbed or extracted. Discharge of concentrated, treated flows to lands will occur in well vegetated areas with diffusers or level spreaders to prevent erosion. Flows transferred from in-stream works to downstream areas be released in a diffused manner.	Supervisor / Environmental Site Representative	Duration
14.	The appearance of water quality at the discharge outlet will be regularly monitored for any increase in turbidity, and dewatering suspended until acceptable water quality levels are regained	Supervisor / Environmental Site Representative	Duration
15.	Adequately designed and constructed concrete washout facilities will be constructed in a suitable location away from drainage lines and 40m from waterways. Concrete wash down to occur directly into lined receptacles or formed washouts.	Supervisor / Environmental Site Representative	Duration
4.	Sediment Controls		
1.	Commonly used sediment control devices are outlined in Section 8 – Table 8, and some construction details are shown in the Standard Drawings shown in this ESCP at Appendix F. Alternative controls or methods may be employed in certain circumstances for practicality or efficiency purposes. Alternative controls or methods must demonstrate efficacy and be in accordance with the intent and objectives of the 'Blue Book'.	Supervisor / Environmental Site Representative	Duration

	Environmental Management Controls	Person Responsible	Timing / Frequency
2.	Substitute materials may be utilised in the construction of erosion or sediment controls where functionality is not affected.	Supervisor / Environmental Site Representative	Duration
3.	Sediment fencing, non-woven geotextile, mulch berms, etc, will be installed on down slope work boundaries, down slope of stockpiles, cut/fill batters, access tracks, etc, to filter sheet flows.	Supervisor / Environmental Site Representative	Duration
4.	Sediment filters will be formed from rock & shade cloth/geotextile structures, aggregate & geotextile filter bags, coir logs, etc, to control concentrated on-site water flows as required	Supervisor / Environmental Site Representative	Duration
5.	Excavated sediment traps may be utilised at critical locations at the toe of the contributing catchment. They will be desilted at 60% capacity and are to be dewatered prior to the onset of further rainfall.	Supervisor / Environmental Site Representative	Duration
6.	The excavated sediment traps should be regarded as a secondary control, relying on retention of coarse sediment in upslope controls within the construction area.	Supervisor / Environmental Site Representative	Duration
7.	Aggregate filter bags or sandbag inlet traps are to be deployed on roadside pit inlets or other inlets to the drainage system.	Supervisor / Environmental Site Representative	Duration
8.	Gully pit inlets will be protected with filter inlet controls formed from sediment fence, filter bags, straw bales & geotextile, coir logs, etc.	Supervisor / Environmental Site Representative	Duration
9.	The sediment captured by control devices is to be removed when 30% of capacity is reached. Regular desilting is also to maintain catchment and settling capacity, and to reduce reentrainment of settled materials in subsequent rain events.	Supervisor / Environmental Site Representative	Duration
5.	Soil Contamination & Acid Sulphate Soils (ASS)		
1.	Excavation of sub-soils to be inspected and monitored as works proceeds, to identify potential contamination. Any potentially contaminated soils to be stripped or excavated separately and transported directly to the designated stockpile, treatment area or licensed waste facility.	Supervisor / Environmental Site Representative	Duration
2.	Potentially contaminated soils or ASS are to be stored within an appropriately bunded area and covered with heavy grade plastic or other impermeable covers for the duration of rainfall.	Supervisor / Environmental Site Representative	Duration
3.	Potentially contaminated excavated material that are required to be removed from site are to be assessed and classified in accordance with the Protection of the Environment Operations Act 1997 and 'Waste Classification Guidelines: Parts 1 and 2 (DECC 2008)'.	Supervisor / Environmental Site Representative	Duration
4.	Excavated soils and materials (that have been assessed, classified, treated, and re-assessed on site) will be re-used as fill material on site where appropriate.	Supervisor / Environmental Site Representative	Duration

	Environmental Management Controls	Person Responsible	Timing / Frequency
5.	Vehicles transporting potentially contaminated soils or ASS both on internal access tracks and public roads will correctly cover loads to mitigate dust generation or spillage.	Supervisor / Environmental Site Representative	Duration
6.	The ground disturbance and machinery/vehicle movements in potentially contaminated areas will be minimised to essential works.	Supervisor / Environmental Site Representative	Duration
7.	Earthworks, soil handling and general disturbance in potentially contaminated areas are to be avoided during periods of strong and/or gusty winds.	Supervisor / Environmental Site Representative	Duration
8.	Water sprays are to be utilised to mitigate dust from contaminated soils in works areas, contaminated soil handling or temporary stockpile areas.	Supervisor / Environmental Site Representative	Duration
6.	Soil & Water pollution control		
1.	All waste will be handled, stored, and disposed of in accordance with the 'Waste Classification Guidelines: Parts 1 and 2 (DECC 2008)'.	Supervisor / Environmental Site Representative	Duration
2.	Waste construction materials such as steel, concrete, etc will be removed to an appropriate recycling facility, to a suitable location for appropriate re-use, or to a licensed waste disposal facility.	Supervisor / Environmental Site Representative	Duration
3.	All putrescible, construction, and food wastes are to be immediately captured and stored correctly, prior to removal to a licensed waste facility. Putrescibles and food wastes will be removed from site on a least a weekly basis.	Supervisor / Environmental Site Representative	Duration
4.	Large amounts of concrete, excess to construction requirements, should not be discharged on site. Residual concrete from hoppers and discharge lines is to be blown into a concrete washout and the remainder in the concrete delivery vehicle returned to the supplier's batch plant for recycling.	Supervisor / Environmental Site Representative	Duration
5.	The effluent from concrete wash down is to be captured by an excavated wash out pit lined with an impervious membrane at least 5 metres away from any waterway or major drainage lines. The pit is to be protected by a diversion bund to prevent entry of site run-off that may subsequently displace alkaline water/slurry. Concrete washouts to be covered for the duration of significant or prolonged rainfall.	Supervisor / Environmental Site Representative	Duration
6.	The water levels in concrete washout pits will be monitored and dewatered regularly. The water pH will be tested and treated where it is outside the parameters of pH 6.5-8.5. Where suitable pH is attained, the water can then be used site purposes.	Supervisor / Environmental Site Representative	Duration
7.	The site machinery 'lay-up' area, re-fuelling areas and chemical storage areas are to be located at least 5 meters away from major drainage lines.	Supervisor / Environmental Site Representative	Duration

Oakdale West Estate: Building 2C & 2D – Erosion and Sediment Control Plan

	Environmental Management Controls	Person Responsible	Timing / Frequency
u C s	The re-fuelling and servicing of machinery is to be ndertaken at approved premises off-site where possible. Onsite refuelling and servicing only to occur with appropriate pill control measures at hand, or where established or emporary bunded areas are available.	Supervisor / Environmental Site Representative	Duration
	Mobile plant, machinery and vehicles are to be regularly aspected and maintained to manufacturer's specifications.	Supervisor / Environmental Site Representative	Duration
s la	ppropriate spill kits are to be always kept on site and any pillage is to be immediately cleaned up. In the event of a arge or hazardous spill, contact will be made with mergency and relevant authorities, where required.	Supervisor / Environmental Site Representative	Duration
p o	Il site personnel will be instructed about emergency spill rocedures, spill kit locations and requirements. The location f spill response kits will be established close to works or perations areas.	Supervisor / Environmental Site Representative	Duration
o s	storage of liquid construction materials (chemicals, fuels, ils, etc) will be provided in appropriately bunded areas on ite to prevent leaching into soils, leaking or other transfer of naterial into waterways.	Supervisor / Environmental Site Representative	Duration
C	Containment bunds are to be monitored regularly and aptured materials removed as required to ensure bund apacity is maintained.	Supervisor / Environmental Site Representative	Duration
Α	Bunded areas will satisfy requirements of the relevant Australian Standards and 'Bunding and Spill Management DEC, 1997)'	Supervisor / Environmental Site Representative	Duration
w m fu	The requirements of the Australian Dangerous Goods Code will be observed for storage and transport of any hazardous naterials. The compatibility of all chemicals, pesticides and uels transported and stored will be assessed to avoid otential risk from reactions, explosion, etc.	Supervisor / Environmental Site Representative	Duration
tr a	Il chemicals, pesticides and fuel will be stored and ransported in approved containers. Chemicals, pesticides and fuels are to be labelled correctly and clearly, including sing approved warning symbols etc.	Supervisor / Environmental Site Representative	Duration
а	MSDS register and will be maintained and be readily ccessible on site for all hazardous chemicals transported, andled or applied.	Supervisor / Environmental Site Representative	Duration
С	n adequate record or log of all environmentally hazardous hemicals received, used and/or disposed of will be naintained.	Supervisor / Environmental Site Representative	Duration
m	Substitution of less hazardous materials or chemicals or nodifying methods of use/storage etc. will be implemented where possible.	Supervisor / Environmental Site Representative	Duration
	he quantities of hazardous materials and chemicals stored r used will be minimised as far as practical.	Supervisor / Environmental Site Representative	Duration

Oakdale West Estate: Building 2C & 2D – Erosion and Sediment Control Plan

	Environmental Management Controls	Person Responsible	Timing / Frequency
21.	Sensitive areas (i.e. drainage lines) will be identified before utilising or applying chemicals. Where sensitive areas are identified, appropriate guidance and relevant restrictions will be formulated for chemical use or applications.	Supervisor / Environmental Site Representative	Duration
22.	The application methods and dilution ratios specified in manufacturer's directions and/or associated MSDS will be observed by personnel.	Supervisor / Environmental Site Representative	Duration
7	Stabilisation		
1.	Promote efficient staging planning for early stabilisation of perimeter or completed areas. (i.e. stabilisation of permanent drains, batters, sealing & paving, and decommissioning of temporary controls)	Supervisor / Environmental Site Representative	Duration
2.	Stabilisation of areas is to occur progressively in conjunction with the completion of earthworks.	Supervisor / Environmental Site Representative	Duration
3.	Suitable design and construction techniques are to be selected for stabilisation of relevant areas such as drain linings, batter treatments, etc.	Supervisor / Environmental Site Representative	Duration
4.	Completed earthworks areas will be backfilled and compacted in a staged manner as soon as possible. Adjacent disturbed areas will be suitably trimmed and stabilised as required.	Supervisor / Environmental Site Representative	Duration
5.	Erosion and sediment controls are to be maintained until the relevant catchments are stabilised, re-vegetated, or sealed adequately to achieve soil surface protection factors as per the 'Blue Book', SWMP & ESCP requirements.	Supervisor / Environmental Site Representative	Duration
6.	Compounds, lay down areas and other areas of heavy construction impact to be restored to an acceptable condition. Destocking, waste removal & cleaning to be followed by scarification, topsoiling and stabilisation.	Supervisor / Environmental Site Representative	Duration
7.	Any aggregate placed for vehicle access or as a work platform should be removed to a suitable location for recycling, appropriate re-use, or to a licensed waste disposal facility.	Supervisor / Environmental Site Representative	Duration
8.	Any areas subject to heavy compaction and disturbance from vehicle movements and machinery will be subject to surface roughening and scarification (up to 300mm) to reduce compaction of the upper layer of soil where landscaping is proposed.	Supervisor / Environmental Site Representative	Duration

Appendix A Site Charac	evised Univ	versal Soil L	₋oss Equation	n Assessment
			1	

Site Characteristics Table & Revised Universal Soil Loss Equation (RUSLE) Data

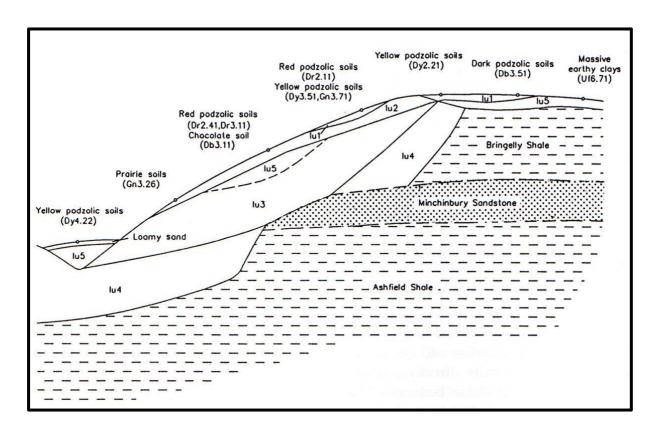
Location	Oakdale West Estate -Building 2C & 2D
Construction duration	<12 months earthworks – 85 th %ile adopted (Sect. 6.3.4 – (f). Blue Book)
Erosion Hazard	High (On slopes >11%) (Sect 4.4.1 & Figure 4.6 – Blue Book)
Soil Loss Class	Class 1 (Sect 4.4.2. & Table 4.2 – Blue Book)
Batter Restrictions	Yes Generally, >20m batter length @ 2H:1V ranging to >30m @ 3H:1V (Sect 4.4.2 – (a) & Figure 4.7 – Blue Book)
Seasonal erosion hazard	No (Sect 4.4.2 – (c), Figure 4.9 & Table 4.3 – Blue Book)
Soil texture group	
Luddenham (lu) Soil Landscape:	lu1—Friable dark brown loam.
High to Very High Hazard	lu2—Hard setting brown clay loam.
landscape	lu3—Whole coloured, strongly pedal clay.
	lu4—Mottled grey plastic clay.
	lu5—Apedal brown sandy clay.
USCS Class	Luddenham: CL (Low Plasticity Clays)
Soil erodibility factor – K factor	Luddenham (Iu) Soil Landscape: 0.038 (0.050 Adopted) (Appendix C – Table 19 – Penrith Soil Landscapes – Blue Book)
Sediment Type	Luddenham (lu) Soil Landscape: Type F & D (Type D Adopted) (Appendix C – Table 19 – Penrith Soil Landscapes – Blue Book))
Soil hydrologic group	Luddenham (lu) Soil Landscape: Group C (Group C Adopted) (Appendix C – Table 19 – Penrith Soil Landscapes – Blue Book))
85th %ile, 5-day rainfall event	32.2 mm - Blacktown (Sect 6.3.4 – Table 6.3a - Blue Book)
Rainfall Intensity - millimetres per hour	9.13mm/hour (0.5 Exceedance per Year) 2 Year, 6 Hour storm – BOM IFD Table)

Site Characteristics Table & Revised Universal Soil Loss Equation (RUSLE Data

Location	Oakdale West Estate -Building 2C & 2D
	1892
Rainfall Erosivity – R factor	(Calculated from 0.5 Exceedances per Year (EY), 6 Hour storm, where S=9.2mm/hour and where R = 164.74(1.1177) *S ^{0.6444}
	Blue Book - Appendix A2 & B)
Volumetric runoff coefficient -	0.51
Cv	(Blue Book – Appendix F: Table F2
Grade	Luddenham (lu) Soil Landscape – 5-20% (commonly 10 -15%)
Slope Length	80 metres adopted
LS Factor	Variable
Erosion control practice factor – P factor	1.3
Ground cover – C Factor	1.0
Sediment Storage Zone	2 months soil loss
Volume design	(Sect 6.3.4 I (ii) - Blue Book)

Typical Soil Profile diagrams

Luddenham (lu) Soil Landscape



Appendix B RUSLE Catchment Assessment & Sediment Basin Calculations

SWMP Commentary, Detailed Calculations

Note: These "Detailed Calculation" spreadsheets relate only to high erosion hazard lands as identified in figure 4.6 or where the designer chooses to use the RUSLE to size sediment basins. The "Standard Calculation" spreadsheets should be used on low erosion hazard lands as identified by figure 4.6 and where the designer chooses not to run the RUSLE in calculations.

1. Site Data Sheet

Site Name: Oakdale West Estate - Building 2C & 2D

Site Location:

Precinct:

Description of Site: Building 2C & 2D Construction Area

Site area		S	ub-cat	chment	Remarks	
Site area	1%/80	2%/80	1%/85	2%/85		Remarks
Total catchment area (ha)	3.75	3.75	3.75	3.75		
Disturbed catchment area (ha)	3.75	3.75	3.75	3.75		

Soil analysis (enter sediment type if known, or laboratory particle size data)

Sediment Type (C, F or D) if known:	D	D	D	D		From Appendix C
% sand (fraction 0.02 to 2.00 mm)						Soil texture should be assessed through
% silt (fraction 0.002 to 0.02 mm)						mechanical dispersion only. Dispersing
% clay (fraction finer than 0.002 mm)						agents (e.g. Calgon) should not be used
Dispersion percentage						E.g. enter 10 for dispersion of 10%
% of whole soil dispersible						See Section 6.3.3(e). Auto-calculated
Soil Texture Group	D	D	D	D		Automatic calculation from above

Rainfall data

Design rainfall depth (days)	5	5	5	5		See Sections 6.3.4 (d) and (e)
Design rainfall depth (percentile)	80	80	85	85		See Sections 6.3.4 (f) and (g)
x-day, y-percentile rainfall event	24.6	24.6	32.2	32.2		See Section 6.3.4 (h)
Rainfall R-factor (if known)	1892	1892	1892	1892		See Appendix B
IFD: 2-year, 6-hour storm (if known)	9.13	9.13	9.13	9.13		See IFD chart for the site

RUSLE Factors

Rainfall erosivity (R-factor)	1892	1892	1892	1892			Auto-filled from above
Soil erodibility (K-factor)	0.05	0.05	0.05	0.05			
Slope length (m)	80	80	80	80			
Slope gradient (%)	- 1	2	- 1	2			RUSLE LS factor calculated for a high
Length/gradient (LS-factor)	0.19	0.41	0.19	0.41			rill/interrill ratio.
Erosion control practice (P-factor)	1.3	1.3	1.3	1.3	1.3	1.3	
Ground cover (C -factor)	1	1	1	1	1	1	

Calculations

Soil loss (t/ha/yr)	24	50	24	50		
Soil Loss Class	1	1	1	1		See Section 4.4.2(b)
Soil loss (m³/ha/yr)	18	39	18	39		
Sediment basin storage volume, m ³	12	25	12	25		See Sections 6.3.4(i) and 6.3.5 (e)

Sediment Basin Design - Oakdale West Estate Building 2C & 2D

4. Volume of Sediment Basins, Type D and Type F Soils

Basin volume = settling zone volume + sediment storage zone volume

Settling Zone Volume

The settling zone volume for *Type F* and *Type D* soils is calculated to provide capacity to contain all runoff expected from up to the y-percentile rainfall event. The volume of the basin's settling zone (V) can be determined as a function of the basin's surface area and depth to allow for particles to settle and can be determined by the following equation:

$$V = 10 \times C_v \times A \times R_{x-day, y-\% le} (m^3)$$

where:

10 = a unit conversion factor

C_v = the volumetric runoff coefficient defined as that portion of rainfall that runs off as stormwater over the x-day period

R_{x-day, y-Wile} = is the x-day total rainfall depth (mm) that is not exceeded in y percent of rainfall events. (See Sections 6.3.4(d), (e), (f), (g) and (h)).

A = total catchment area (ha)

Sediment Storage Zone Volume

In the detailed calculation on Soil Loss Classes 1 to 4 lands, the sediment storage zone can be taken as 50 percent of the settling zone capacity. Alternately designers can design the zone to store the 2-month soil loss as calculated by the RUSLE (Section 6.3.4(i)(ii)). However, on Soil Loss Classes 5, 6 and 7 lands, the zone must contain the 2-month soil loss as calculated by the RUSLE (Section 6.3.4(i)(iii)).

Place an "X" in the box below to show the sediment storage zone design parameters used here:

50% of settling zone capacity,
X 2 months soil loss calculated by RUSLE

Total Basin Volume

Site	C,	R _{s-day, y-Nille}	Total catchment area (ha)	Settling zone volume (m³)	Sediment storage volume (m³)	Total basin volume (m³)
1%/80	0.51	24.6	3.75	470.475	12	482.475
2%/80	0.51	24.6	3.75	470.475	25	495.475
1%/85	0.51	32.2	3.75	615.825	12	627.825
2%/85	0.51	32.2	3.75	615.825	25	640.825

Note that designers should achieve a minimum 3:1 length:width ratio in Type D or F basins

Sediment Basin Design - Oakdale West Estate Building 2C & 2D

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Appendix C

Sediment Basin Management & Dewatering Procedure

1.1 Purpose

The purpose of the Sediment Basin Management & Dewatering Procedure (the Procedure) is to detail the actions to be taken in regard to site dewatering in general and specific measures for the construction and maintenance of sediment basins including steps to be taken prior to any discharge.

Adherence to the methodology outlined in procedure will ensure that works are carried out in accordance with industry standard and environmental conditions.

1.2. Scope

The Procedure applies to the following works:

- Sediment basin management and maintenance; and
- Dewatering of excavations and construction water generally, and
- Acid sulfate leachate ponds if acid sulfate soils or rock is encountered.

1.3. Objectives

The objectives of this Procedure are to:

- Ensure all Project personnel are aware of the requirements of this procedure
- Detail personnel responsible for undertaking actions relating to sediment basin, construction dewatering and acid sulfate leachate management on the site;
- Providing a uniform, controlled methodology and clear criteria for water releases from the site;
- Implement industry standard methods for managing sediment basins and dewatering in accordance with best practice guidelines such as Managing Urban Stormwater Soils and Construction (Landcom 2004) and Acid Sulfate Soil Manual (ASSMAC 1998);
- Ensure water discharges from site are compliant with:
 - the NSW EPA Water Quality Criteria;
 - Managing Urban Stormwater Soils and Construction (Landcom 2004)
 - Approved Erosion and Control Plan; and
- Comply with environmental requirements of the Project, including all legal requirements and contractual obligations.

The procedure shall ensure appropriate environmental protection measures are in place relating to sediment basins, construction water management (dewatering of excavations, culverts, etc) and management of leachate collected in ponds from acid sulfate material stockpiles.

2. Sediment Basin Management & Dewatering Procedure

Environmental Management Controls	Person Responsible	Timing / Frequency
The sediment basin/s to be constructed prior to any earthworks or topsoil	Supervisor /	Site
stripping in the catchment being undertaken. Necessary clearing to	Environmental Site	Establishment /
access the basin location and associated earthworks will occur with	Representative	Duration
appropriate erosion and sediment controls installed.		
Where applicable, the formation of operational sediment basins will be	Supervisor /	Site
partially or fully constructed in early stages of works and managed as a	Environmental Site	Establishment /
temporary sediment basin to capture construction runoff.	Representative	Duration
Effective diversions such as drains, and berms will be implemented to	Supervisor /	Site
ensure that the diversion of site runoff is maximised to basins during all	Environmental Site	Establishment /
stages of construction.	Representative	Duration
Water Quality Testing, Treatment & Criteria for Discharge		
Captured water to be discharged from sediment basins must meet the following criteria:	Supervisor / Environmental Site	Duration
pH between 6.5 – 8.5	Representative	
<u></u>	•	
-		
Oil and grease - no visible trace.	F ' ' ' '	D (
Correlation between TSS and Turbidity	Environmental	Duration
A correlation between TSS and turbidity may be developed for the	Manager/	
basin/s to allow discharge based on turbidity levels. This correlation will	Environmental Site	
be submitted to the relevant Approval Authority for approval prior to	Representative	
implementation.		
If approved, a TSS sample will be taken from every tenth discharge and		
tested to confirm compliance with required criteria. These results will be		
used to check and revise the correlation. If these tests indicate an		
exceedance of TSS criteria, discharges on the basis of turbidity		
measurements will be suspended until the correlation can be re-		
established and approved.	• • •	D (
Potential contamination of any basin or ponded waters will be	Supervisor /	Duration
considered prior to discharge. Where the main source is from storm	Environmental Site	
water, TSS and oil and grease are considered to be the likely	Representative	
pollutants. Where groundwater is a significant contributing source,		
influence from ASS/PASS, or other contaminants will be considered as		
potential pollutants and additional testing in the form of pH and metals		
may be undertaken. Water Treatment		
The drain inverts upslope from sediment basin inlets will be pre-dosed	Supervisor /	Duration
with suitable flocculants/coagulants (Gypsum or Calcium Chloride	Environmental Site	
broadcast in the drain invert and/or Anionic Polyacrylamide gel blocks	Representative	
suspended in cages in locations of turbulent water flow.) to pre-treat		
run-off before it enters the basin during rainfall		ļ
The implementation of rain-activated, passive dosing units will deploy	Supervisor /	Duration
suitable liquid flocculants/coagulants during prolonged rainfall events to	Environmental Site	
promote rapid coagulation/flocculation of sediment laden water in the	Representative	
treatment forebay of sediment basins.		
Onsite reuse of ponded stormwater or infiltrated groundwater should	Supervisor /	Duration
always be the first dewatering option considered. Onsite reuse may	Environmental Site	
include application for dust suppression, earthworks compaction and	Representative	
vegetation establishment.		
If water is to be used for construction purposes (e.g. compaction, dust	Supervisor /	Duration
control) no treatment is required. However, the water should be	Environmental Site	
removed to re-secure design capacity of sediment basins within 5 days.	Representative	

	Environmental Management Controls	Person Responsible	Timing / Frequency
	nent basins to be inspected for capacity and water quality daily days and within 24 hours (out of site hours) following cessation period.	Supervisor / Environmental Site Representative	Duration
	any de-watering of site areas, excavations, etc, the parameters of .S. and oil and grease are to be tested and meet the following	Supervisor / Environmental Site Representative	Duration
•	pH between 6.5 – 8.5 TSS < 50mg/L; and Oil and grease < 10mg/L (and no visible trace).		
	ent should commence as soon as practical following cessation to allow enough time for settlement of suspended solids.		
	of water quality management must be maintained, and the records include: The date(s) on which the sample was taken; The time(s) at which the sample was collected;	Supervisor / Environmental Site Representative	Duration
pH	The name of the person who collected the sample.	Supervisor /	Duration
	ent should be undertaken as follows:	Environmental Site	
•	Test basin water with a suitable pH meter. No action is required if the pH reading is between 6.5 and 8.5	Representative	
•	Lime to be added if pH below 6.5 or Hydrochloric Acid (32% Muriatic) or Sulfuric Acid to be added if pH above 8.5		
•	Determine volume of water to be treated in the sediment basin.		
•	Determine the percentage of lime or acid required by taking a 10-litre sample of basin water and adding a known amount of lime or acid (initially 0.004%). If the pH is still not acceptable, vary the amount of lime or acid until within the limits.		
•	Once the required percentage has been determined, calculate the actual amount of lime or acid to be added by multiplying the volume of water in the basin by the determined percentage.		
•	Add the required amount of lime or acid to the basin and mix the water in the sediment basin well Treat for pH prior to T.S.S.		
Total S	uspended Solids	Supervisor /	Duration
•	Test the sediment basin water initially for NTU using a turbidity tube, nephelometer (Turbidity tester) or by comparing with water samples contained in jars with representative readings up to 100mg/l.	Environmental Site Representative	
•	When the comparative NTU readings indicate T.S.S. levels are <50mg/l obtain a grab sample in accordance with approved sampling methods. The water sample to be promptly analysed by a laboratory that is NATA certified in T.S.S. testing.		
•	No further treatment action is required if T.S.S. results are <50mg/l.		

	Environmental Management Controls	Person Responsible	Timing / Frequency
Total S	Test the sediment basin water initially for NTU using a turbidity tube, nephelometer (Turbidity tester) or by comparing with water samples contained in jars with representative readings up to 100mg/l.	Supervisor / Environmental Site Representative	Duration
•	When the comparative NTU readings indicate T.S.S. levels are <50mg/l obtain a grab sample in accordance with approved sampling methods. The water sample to be promptly analysed by a laboratory that is NATA certified in T.S.S. testing.		
•	No further treatment action is required if T.S.S. results are <50mg/l.		
•	If basins require flocculation (e.g., T.S.S. >50mg/l), a flocculant/coagulant is to be utilised at the determined dosage initially, then treated with incremental doses should more flocculant be required.		
•	Basins should be monitored daily after flocculation until desired TSS is achieved and to assist in determination of optimal dosage levels.		
Method	s of application to include:		
•	broadcast by shovels on small sumps and excavations is acceptable. This method requires spreading powdered coagulants (i.e., gypsum, calcium chloride, etc) evenly and thinly (i.e., "dusting") over as much of the water surface as possible.		
•	For sediment basins or areas with a large water surface area. The powdered or flake style coagulants should be pre-mixed thoroughly in a drum with clean water and sprayed over the maximum surface area of water as possible.		
•	When spraying coagulant mixtures, the mixture should hit the water at an angle of between 10 to 20 degrees to increase the surface area's exposure over the underlying water column.		
	Alternative water treatment utilising liquid flocculants/coagulants will require the assessed dosage to be pre-mixed and discharged into the basin. Following dosing, the basin water is to be gently re-circulated for a suitable period (2-4 hours) to allow chemical reaction time, and to keep precipitated flocculant/coagulant in suspension a sufficient time to collect the maximum quantity of fine suspended particles into floc clusters. The process outlined may need to be repeated if acceptable water quality is not achieved initially.		
Oil and	Grease		
•	Examine surface of water for evidence (e.g. sheen, discoloration).		
•	No action if no visual contamination.		,
•	Oil absorbent material to be spread if there is contamination (e.g. cell-u-sorb). Leave basins to compensate for 24 to 48 hours.		

Environmental Management Controls	Person Responsible	Timing / Frequency
After retesting, and once the above field tests indicate, the water quality is acceptable, pumping or siphoning can commence with the water extraction inlet protected to prevent extraction of sediment.	Supervisor / Environmental Site Representative	Duration
Discharging Water		
Where possible ponded water and sediment basin water will be reused on site for compaction, dust suppression, and irrigation.	Supervisor / Environmental Site Representative	Duration
The whole process of water quality management in sediment basins will be completed within 5 days of cessation of a rain period.	Supervisor / Environmental Site Representative	Duration
Water may be discharged from site where the tested water quality meets NSW EPA criteria and the Site Representative gives approval. The discharge outlet will be constructed to prevent erosion and scour.	Supervisor / Environmental Site Representative	Duration
The Supervisor is to ensure that treated water has been re-tested for pH and turbidity (NTU) in-situ immediately prior to discharge.	Supervisor / Environmental Site Representative	Duration
The preferred method for dewatering a sediment basin is by the use of a static siphon system with sufficient flow capacity to discharge the volume of supernatant water within a reasonable timeframe (i.e. 12 to 24 hours). The siphon inlet is to be positioned so that settled sediments are not extracted during dewatering. The siphon system is to be installed above the sediment basin embankment and <u>not</u> within the basin spillway.	Supervisor / Environmental Site Representative	Duration
Where sediment basins are to be <u>dewatered by pump</u> , suitable inlet protection devices (i.e. float & housing or extraction tube) will be provided to prevent the extraction of settled sediments within the basin. The flows from the pump outlet and basin are to be constantly monitored during discharge.	Supervisor / Environmental Site Representative	Duration
Only personnel who have undertaken the relevant training and been approved by the Supervisor may operate pumps and discharge sediment basins. During dewatering <u>pumps</u> must be always monitored to ensure that settled sediment is not disturbed or extracted, and that water is discharged in a diffused manner to prevent erosion.	Supervisor / Environmental Site Representative	Duration
A Sediment Basin Management Register will be maintained for each basin that details discharge volumes, dates, water treatment. The Sediment Basin Management Register will be updated when treated water is discharged from the basin.	Supervisor / Environmental Site Representative	Duration
Maintenance		
Maintenance of the sediment basins will be ongoing for the duration of the Project and will comprise the following: • The sediment storage capacity limit will be defined through the installation of a marker inside the basin. Sediment will be removed from the basin in accordance with the maintenance schedule, or when the accumulated sediment exceeds 60% of the sediment storage zone.	Supervisor / Environmental Site Representative	Duration
 Sediment removed from basins may be reused on site by incorporating into spoil. All sediment that will not be reused on site will be disposed of in locations that it will not be conveyed back into the construction areas or watercourses. Maintenance inspections will be undertaken, and the results incorporated into the Weekly Environmental Inspection Checklist. 		

Environmental Management Controls	Person Responsible	Timing /
		Frequency
The stormwater capacity of sediment basins will be reinstated within 5 days of the cessation of a rainfall event that causes runoff to occur	Supervisor / Environmental Site Representative	Duration
Assessment and use of Coagulants & Flocculants		
Coagulation is the neutralisation and/or destabilisation of electrical charge on suspended soil colloids, whereas flocculation utilises bridging type interactions involving polyelectrolyte chains adsorbing to multiple colloid particles and aggregates through electrostatic charge interactions. The following procedure will be implemented to determine the suitability	Supervisor / Environmental Site Representative	Duration
 and effectiveness of the various water treatment products. The product will be sourced from a reputable and traceable supplier together with MSDS and any other supporting documentation. Controlled 'jar testing' will be undertaken using site sourced water from the sediment basin. The jar testing will establish the site-specific dosing rates for any given products. Initial dosing will be undertaken incrementally up to the site specific/determined dosing rate if the basin water responds to a lower dose in the 'real world' application. Settling rates in the basin will be assessed to determine the efficiency of each product. On site water sampling and testing will progressively assess the water's pH and turbidity in NTU's prior to lab testing. NATA certified lab testing for TSS, NTU & pH will be completed prior to any dry weather/controlled discharge to downstream waterways. 		
The range and type of suitable flocculants/coagulants (including typical dosing rates described as product required to water volume)) that may be utilised include; • Calcium Sulphate (Gypsum - powder) – 300ppm (30kg/100m3) • Anionic Polyacrylamide (gel blocks) – 200ppm (20kg/100m3) • Calcium Chloride (solid - flakes), – 200ppm (20kg/100m3) • Aluminium Chlorohydrate (liquid) – 40ppm (4L/100m3) • PAC23 (poly aluminium chloride 23% - solution) - 50ppm (12.5L/100m3) • Aluminium Sulphate (crystals) – 200ppm (20kg/100m3)	Supervisor / Environmental Site Representative	Duration
Storage and Handling of Flocculants		
Environmental Management Controls	Person Responsible	Timing / Frequency
Gypsum and agricultural lime will be stored on site as either bagged or bulk product. Storage of bulk gypsum and agricultural lime will be covered, within erosion and sediment controls in a position where run on water will not erode the stockpiles.	Supervisor / Environmental Site Representative	Duration
All treatment chemicals particularly acids and basics will be stored in appropriately bunded and covered locations that are locked to prevent unauthorised access.	Supervisor / Environmental Site Representative	Duration
All chemicals on site will be stored with MSDSs for ease of reference in the event of a spill or irritation/injury to handlers.	Supervisor / Environmental Site Representative	Duration
Requirements of the Material Safety Data Sheets (MSDSs) will be met to ensure compatible storage with other chemicals to ensure safety.	Supervisor / Environmental Site Representative	Duration

Monitoring and Record Keeping			
Environmental Management Controls	Person Responsible	Timing / Frequency	
All sediment basins will be inspected on a weekly basis as a minimum, with any defects or maintenance requirements reported immediately. Sediment basins will be inspected immediately after rainfall events to assess: • Water Storage capacity and water quality treatment requirements prior to discharge • Following treatment and discharge from the sediment basin the sediment storage capacity and requirement for clean out will be assessed.	Supervisor / Environmental Site Representative	Duration	
Records to be kept of the rainfall events, inspections undertaken, field tests undertaken, dosage rates and when basin water is released etc.	Supervisor / Environmental Site Representative	Duration	
The results of all inspections, including inspection reports will be retained in the site environmental inspection register	Supervisor / Environmental Site Representative	Duration	
 All discharges will be recorded on a discharge permit which will include: Volume to be discharged Treatment details (e.g. Coagulant/ flocculant used, dosage, duration and treatment date) Water quality monitoring results (including date and time of testing) Discharge water quality results Date and time of discharge 	Supervisor / Environmental Site Representative	Duration	
Pumped discharge of any water off site will be monitored regularly to ensure that tested water quality meets all applicable criteria.	Supervisor / Environmental Site Representative	Duration	
Decommissioning Construction Sediment Basins			
Construction sediment basins will remain in place until all upstream areas have been stabilised to achieve a 'C' Factor of 0.05 which equates to 70% groundcover as per Blue Book 7.1	Supervisor / Environmental Site Representative	Duration	
All operational sediment basins will be desilted and reformed as per design requirements prior to completion of major works within the catchment.	Supervisor / Environmental Site Representative	Duration	
Construction Sediment basins will be removed by restoring the ground disturbed by the construction of the basin similar to pre-existing conditions. This will be achieved by: Removing all redundant basin equipment such as basin markers, siphons, spillway linings, etc. Spreading and compacting the embankment material in the basin area Disturbed ground will be compacted to at least the relative density of the material in the ground adjacent to it.	Supervisor / Environmental Site Representative	Duration	

3. Procedure Review

The procedure will be regularly reviewed as part of the CEMP audit requirements. This document will be updated when needed in response to audit findings or changes to site conditions. The Environmental Site Representative will modify the procedure where improvements are identified.

Appendix D

Sediment Basin Management and Discharge Record

Sediment Basin Management and Discharge Record

Date Inspected			Basin/discharge point	ID:			
Date of last rainfall event:			Amount of rainfall received:				
Estimated basin level in %?			Approximate volume of water in basin prior to treatment:	of			
Initial turbidity reading of the basin in NTU's			Initial pH of the basin? (range of 6.5 -8.5 required)	in?			
The initial amount of acid/lime used if pH correction is required.			Date & time of acid/lim dosing	ne		1	/ am/pm
Subsequent amount of acid/lime used if pH correction is required.			Date & time of acid/lim	ne	1	1	am/pm
Type of flocculant or coagulant product used (and typical dosing volume)	Yes	No	Flocculant or coagulant product used		Date & time of flocculant or coagulant dosing		nt or
Calcium Sulphate (Gypsum - powder) 300ppm (30kg/100m3)					1		/ am/pm
Anionic Polyacrylamide (gel blocks) 200ppm (20kg/100m3)					1		/ am/pm
Calcium Chloride (solid - flakes) 200ppm (20kg/100m3)					1		/ am/pm
Aluminium Chlorohydrate (liquid) 40ppm (4L/100m3)					1		/ am/pm
PAC23 (poly aluminium chloride 23% - solution) 50ppm (12.5L/100m3)					1		/ am/pm
Aluminium Sulphate (crystals) 200ppm (20kg/100m3)					1		/ am/pm
Turbidity reading of the basin in NTU's		<u> </u>	Laboratory TSS Result: (if applicable)				
Time and Date of dewaterin	• · .		e opened for		/		<u> </u>
discharge or commencemer Supervisor responsible for discharge:	nt of pum	Name:	ion)				am/pm
Date:		Signed:					
Comments? (E.g. next rainfall predicted moderate, severe?) Was rainfall received during treatment period affecting based (start a new sheet)							

Appendix E

Wet weather contingency procedure

1.1 Purpose

The purpose of the Wet Weather Contingency Procedure (the Procedure) is to detail the actions to be taken by construction personnel in response to an imminent severe rainfall event as forecast by the Australian Government - Bureau of Meteorology (BOM). The procedure provides guidance for monitoring BOM rainfall & storm event forecasts and other resources, to assist with Project preparations to minimise adverse site impacts where practical.

Adherence to the methodology outlined in procedure will ensure that works for wet weather contingency planning & implementation will be carried out in accordance with contract specifications and to maximise adherence to environmental obligations.

The purpose of the Wet Weather Contingency Procedure is to;

- Identify rainfall events which may cause significant precipitation over the site areas which would result in flash flooding and/or exacerbate erosion and sediment impacts;
- Include monitoring procedures of the Bureau of Meteorology (BOM) weather forecasts to predict severe rainfall events;
- Ensure emergency procedures are developed for the management of work areas, facilities and materials in a severe rainfall event that has the potential to impact areas of the Site;
- Ensure hazardous chemical & fuel/oil storage and stockpile areas are positioned in locations to limit the potential for adverse impacts from major runoff flows and/or flash flooding;
- Outline control measures for the protection of water quality in the event of a flood over the site:
- Ensure progressive stabilising methods for areas that may be potentially affected by flash flooding and/or significant scouring & erosion are implemented.

1.2. Scope

The Procedure applies to the following:

- · Weather forecast monitoring and works planning,
- Implementation, monitoring and maintenance of erosion and sediment controls,
- Stockpile and hazardous materials storage,
- Sediment basin management, dewatering and maintenance.

1.3. Objectives

The objectives of this Procedure are to:

- Ensure all Project personnel are aware of the requirements of this procedure
- Detail personnel responsible for undertaking actions relating to works planning, erosion and sediment control management, sediment basin management & construction dewatering on the site;
- Comply with environmental requirements of the Project, including all legal requirements and contractual obligations.

2. Wet Weather Contingency & Management

Environmental Management Controls	Person Responsible	Timing / Frequency	
Planning			
A copy of this Wet Weather Contingency Procedure will be kept on site and be made available to all relevant project personnel	Supervisor / Environmental Site Representative	Site Establishment / Duration	
All relevant project personnel will be made aware of this document during the site induction and again in Toolbox Talks and targeted training sessions.	Supervisor / Environmental Site Representative	Site Establishment / Duration	
Training and Awareness			
Training & instruction of site personnel will be the responsibility of the Environment Manager/ Environmental Site Representative.	Environmental Site Representative	Site Establishment / Duration	
 Training sessions will be conducted with Supervisors, Foreman, Environmental Work Crew, and relevant personnel. The training will address Weather forecast monitoring procedures and interpretation of forecasting by BOM and other sources Site erosion and sediment control status and high-risk areas Roles and responsibilities for wet weather preparation Temporary measure selection for augmentation or additional ERSED measures Pre & post-rainfall inspections and recording Dewatering requirements, methods, and recording Identification of stabilisation and rectification works required. 	Supervisor / Environmental Site Representative	Site Establishment / Duration	
Identification of significant rainfall events			
The daily BOM forecasts for the Penrith area are issued each morning and late afternoon. The forecasts will be monitored daily, at the start of the shift and prior to shut down. The BOM three-day forecast outlook will be reviewed daily.	Supervisor / Environmental Site Representative	Duration	
BOM forecasts indicating a high likelihood of storm fronts or rainfall events of >10mm with an occurrence probability of more than 50% will be regarded as a potential rainfall event.	Supervisor / Environmental Site Representative	Duration	
In periods of forecast storm weather or likely rainfall events, the tracking and intensity of approaching weather fronts is to be monitored regularly (where possible) to anticipate the time of the onset of wet weather.	Supervisor / Environmental Site Representative	Duration	
Wet Weather Management Procedures Where a potential rainfall event is deemed likely in the BOM three-day outlook, Project personnel are to review the scope and progress of existing and imminent site works to determine high risk areas and prioritise works to stabilise the nominated areas. High risk works include culvert works, scour protection installation, permanent drainage installation, trenching on grade, and sediment basin construction or maintenance.	Project Manager / Senior Engineer / Supervisors / Environmental Site Representative	Duration	

Environmental Management Controls	Person Responsible	Timing / Frequency		
Wet Weather Management Procedures				
 The high-risk work areas that are identified will be managed by; Completion and temporary/permanent stabilisation of the high-risk work areas where time & resource constraints allow, prior to the onset of the potential rainfall event. Re-allocating resources from low-risk activities to assist with completion of high risk works prior to the onset of a rainfall event. Implementation of erosion controls in high-risk areas to minimise sediment control requirements. Erosion controls will be employed such as; temporary geotextile linings or soil binders will be installed around culverts, scour protection works and drain junctions, sandbag check dams, rock baffles, trench stops, etc will be utilised in open trenching on grade, temporary diversion drains, or concentrated flow paths over unstabilised areas. 	Project Manager / Senior Engineer / Supervisors / Environmental Site Representative	Duration		
 The site sediment controls, and sediment basins are to be inspected and any necessary rectification works undertaken such as; Sediment basins are to be managed in accordance with Sediment Basin Management Procedure to regain the maximum runoff capacity parameters, where possible, Sediment traps and filters to be desilted where more than 60% storage capacity is exceeded, Spillways and discharge points from sediment traps to be inspected and reinstated as required. Sediment fences, mulch bunds, earth berms to be inspected and repairs or reinstatement implemented as required. 	Supervisor / Environmental Site Representative	Duration		
The chemical, fuel and other hazardous material storage areas to be inspected to ensure their location is protected from the ingress of rainfall or concentrated overland flows. Bund controls to be inspected and accumulated liquids or other residues removed to a controlled waste location on site or for offsite disposal at licensed premises.	Supervisor / Environmental Site Representative	Duration		
Following the onset of a significant storm event or rainfall event, the site controls to be inspected as soon as site conditions and safety requirements allow. The inspection to focus on high-risk areas to review the function and status of the installed erosion and sediment controls. Post-Rainfall/Storm Procedure	Supervisor / Environmental Site Representative	Duration		
The Post Rainfall Inspection will be conducted in accordance with Section 7.7 of this ESCP. The identified high-risk areas will be prioritised for any rectification or maintenance works, followed by areas with lower risk.	Supervisor / Environmental Site Representative	Duration		
Records detailing the necessary works to reinstate the controls will be conducted in accordance with Section 7.7 of this ESCP.	Supervisor / Environmental Site Representative	Duration		
Sediment basins are to be managed in accordance with Sediment Basin Management Procedure. Flocculation of the sediment basins may occur soon after the cessation of a rainfall event to improve the water quality parameters in circumstances where further significant rainfall is anticipated.	Supervisor / Environmental Site Representative	Duration		

Environmental Management Controls	Person Responsible	Timing / Frequency
High risk work areas that are inundated will be prioritised for dewatering	Supervisor /	Duration
by;	Environmental Site	
 Dewatering to a sediment basin where sufficient capacity is available, 	Representative	
 Flocculated in-situ and discharged at a licensed discharge point when EPL water quality parameters are attained, 		
Dewatered by water cart and utilised for construction purposes.		
Repair and reinstatement of erosion and sediment controls to be	Supervisor /	Duration
implemented as site conditions allow, proceeding from high risk areas to		
lower risk areas on site.	Representative	

3. Procedure Review

The procedure will be regularly reviewed as part of the CEMP audit requirements. This document will be updated when needed in response to audit findings or changes to site conditions. The Project Environmental Representative in consultation with the Client will modify the procedure where improvements are identified.

Appendix F

Progressive Erosion and Sediment Control Plan



Oakdale West Estate - Building 2C & 2D - Progressive Erosion & Sediment Control Plan

NOTES - Administration & General

- 1. This progressive plan is to be read in conjunction with the SWMP, CEMP, relevant specifications, and procedures.
- 2. Works programming to maximise the mitigation of erosion by the early implementation of permanent drainage measures, temporary and permanent soil surface stabilisation measures, and minimising the area and duration of soil disturbance.
- 3. Bureau of Meteorology weather forecasting to be monitored daily for the local 7-Day weather outlook. Site management measures to be planned for imminent storm/rainfall/flood/wind events include, but are not limited to;
 - avoiding additional soil disturbance immediately prior to an event,
 - provision of additional erosion and sediment controls in critical locations,
 - installing, repairing, and/or adjusting 'clean' (off site water) and 'dirty' (on site) water drainage measures,
 - desilting and re-instating sediment controls as required,
 - implementing stockpile protection measures,
 - stabilising and sealing disturbed soil surfaces,
 - minimising dry soil handling in windy conditions,
 - evacuating or protecting erodible materials in lower lying area.
- 4. The plan is to be revised as necessary (i.e. progression of works, altered site conditions or weather). The controls depicted are subject to staging and the controls may be progressively implemented or removed according to progression of works. The symbols depicting controls are not to scale and are only indicative of the general location and type of control selected.
- 5. All erosion and sediment controls generally to be constructed in accordance with 'Blue Book' specifications and standard drawings & RMS Specifications being
 - MANAGING URBAN STORM WATER: SOILS AND CONSTRUCTION 4th EDITION, LANDCOM, MARCH 2004;
 - MANAGING URBAN STORM WATER: SOILS AND CONSTRUCTION VOLUME 2D MAIN ROAD CONSTRUCTION, DEC, 2008;
- 6. Substitute materials may be utilised in the construction of erosion or sediment controls where functionality is not affected, i.e. compacted mulch bunds in place of sediment fences, stabilised earth Berms in place of excavated drains near underground services or timber pegs in place of star pickets where electrical or gas.
- 7. Personnel constructing controls to have demonstrated competence and experience. Specific awareness training and workshops to be undertaken by personnel with direct involvement with erosion and sediment control. Toolbox talks to regularly focus on erosion and sediment control for specific works, associated risks, potential impacts and mitigation measures.
- 8. All existing vegetated or undisturbed areas outside of the works area to be regarded as "No Go" zones and to be delineated with fencing, tape or other markers, as required. All site personnel to be instructed to avoid "No Go" zones or damaging installed controls.

Erosion Control

- 9. Prior to commencement of significant works, install surface drains, sediment traps, sumps & filters, and other surface runoff control measures to control runoff onto, across, and from the works zones to prevent the loss of sediment from the site.
- 10. Construction zones in constrained areas to be managed in smaller, defined sub-catchments to reduce slope lengths and minimise sediment loads to boundary controls.
- 11. Excavated material to be stockpiled generally as per SD 4-1.
- 12. Short term on-site stockpiles to be located away from drains and flow lines and be controlled with sediment fence or storm covers.
- 13. Any significant (long & steep) cut/fill batters should be progressively overlaid with Rolled Erosion Control Products (RECP's such as jute mesh, coir fibre mesh, etc), mulching, Organic Fibre Mulches (OFM's) or geobinders to reduce erosion and rilling, prior to permanent stabilisation with cover crops, mulching or other long-term surface protection
- 14. Vehicles transporting bulk materials on public roads are to correctly cover loads to prevent loss of load and/or dust generation.
- 15. Temporary controls in addition to those shown may be required at strategic locations as required by the progression of works or weather conditions

Water Management (Cont'd)

- 16. Maximise the interception and diversion of 'clean' (off site water) away from works areas. The 'clean' flows to be conveyed in stabilised drainage lines to suitable discharge points. The flows to be discharged to off-site areas at non-erosive velocities with adequate diffusers, level spreaders, etc. Ensure drainage paths and controls are adjusted as required to maximise the separation of 'clean' (off site) and 'dirty' (on site) water flows through/off site.
- 17. Flows paths with high velocity flows over unstabilised areas to be controlled with
 - applied soil surface stabilisers i.e. geotextile lining, applied soil binders, coarse rock lining, etc
 - suitably constructed check dams placed at intervals to maximise flow suppression and settling of coarse sediment.
- 18. Where possible, provide sand bag or other bunding controls at on-site collection points & pit inlets to prevent flows bypassing controls to downslope areas.
- 19. Protect all existing and constructed inlets to pits & culverts from sediment ingress.
- 20. Where practical, maintain and/or improve existing stabilised drains to assist in the diversion of 'clean' (off site) flows.
- 21. Flooded excavations, ponded water, etc. to be extracted where required and utilised for site purposes, or treated to achieve acceptable water quality prior to discharge.

Sediment Control

- 22. The installation of preliminary sediment controls such as perimeter sediment fencing, excavated sediment traps, check dams, coir log filters, etc, will be implemented prior to soil disturbance within the catchment.
- 23. Accumulated water in sediment traps/sumps cannot be pumped, discharged or released from site without completing a dewatering checklist or approval by an authorised Site Manager.
- 24. Appropriate sediment tracking controls such as an aggregate/geotextile apron, shaker grid, etc. will be installed at exit points from the site. Personnel to monitor roadways & tracked sediments to be removed as required.
- 25. Personnel to ensure visual dust monitoring is maintained during works, and dust suppression is undertaken regularly. Dust control to be regularly conducted with water carts and soil stockpiles to suitably covered. Additional dust suppression measures to be utilised to minimise dust pollution during periods of high winds.
- 26. Temporary 'dirty' water drainage will be adjusted progressively to maximise flows to sediment control devices.

Contamination

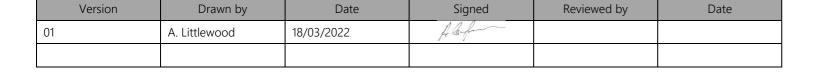
- 29. Excavation of sub-soils to be inspected and monitored as works proceeds, to identify potential contamination. Any potentially contaminated soils to be stripped or excavated separately and transported directly to the designated stockpile, treatment area or licensed waste facility.
- 30. Potentially contaminated soils are to be stored within an appropriately bunded area and covered with heavy grade plastic or other impermeable covers for the duration of rainfall.
- 31. Ground disturbance and machinery/vehicle movements in potentially contaminated areas will be minimised to essential works.

Monitoring & Reporting and Inspection & Maintenance

- 32. Inspections of erosion and sediment controls will occur following rainfall events >10mm (daily on work days or as soon as practical during site shutdown periods), with any necessary repairs implemented as soon as possible.
- 33. Relevant checklists and records to be maintained noting details such as rainfall received, repairs to controls and amounts of sediments cleaned from controls.
- 34. Sediment traps, sumps and filters are to be desilted when 60% of storage capacity is reached.
- 35. All site personnel to report any spill, leaks, or other failure to relevant response staff as soon as possible.

Stabilisation

- 36. Erosion and sediment controls are to be maintained until the relevant catchments are stabilised, re-vegetated, or sealed adequately to achieve soil surface protection factors as per the 'Blue Book' and SWMP requirements.
- 37. Completed earthworks areas will be backfilled and compacted in a staged manner as soon as possible. Adjacent disturbed areas will be suitably trimmed and stabilised as required.
- 38. Stabilisation of areas is to occur progressively in conjunction with the completion of earthworks.
- 39. Areas subject to heavy compaction and disturbance from vehicle movements and machinery to be scarified to a depth >100mm prior to topsoiling and seeding.

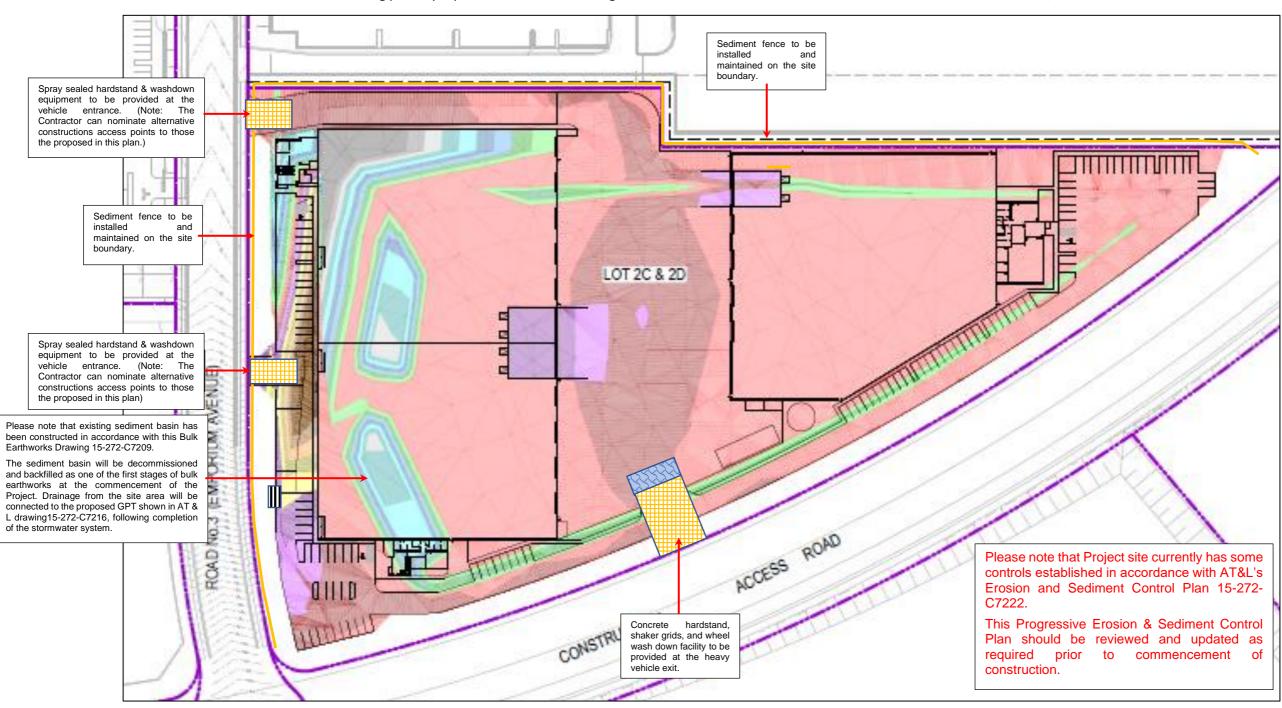






Oakdale West Estate- Building 2C - 2D - Progressive Erosion & Sediment Control Plan - Site Establishment & Bulk Earthworks

The drawing partially reproduced below is Drawing 15-272-C7209 extracted from AT&L's Bulk Earthworks Plan issued 18/10/2021.

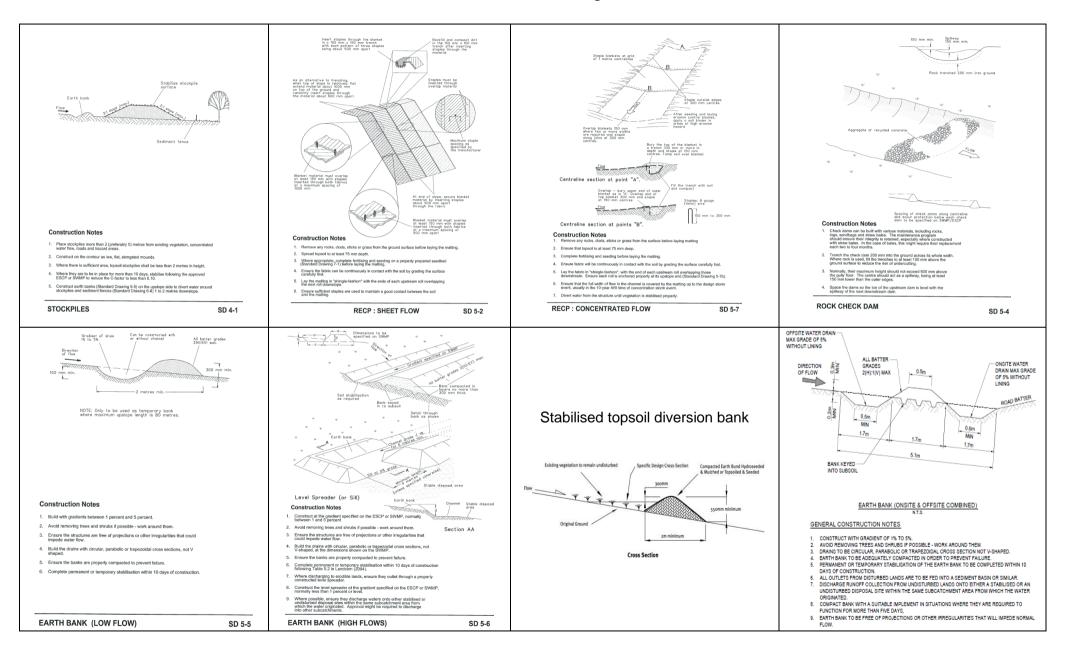


Legend									
Off Site Water – Sheet Flows	>	Piped Drainage	======	Stabilised Topsoil Berm (geo/jute/seed)		Sediment basin / large sump	Sediment Fence Geotextile Apron	Vegetated filter	23333
Off Site Water – Concentrated Flow/Drain		Off-site & onsite water cross-over	+	Geo-lined drain		Filter bag sediment trap	Mulch bund	Stabilised site access / Shaker / Wheelwash	
On Site Water - Concentrated Flow/Drain	→	'Off site' water exclusion bank		Rock lined drain	550000000000000000000000000000000000000	Compacted Mulch / Rock & Geotextile / topsoil sediment trap	Coir Log / Straw bale filter	Stabilised Haul Road/Access Track/ Piling pad/Piped crossing	
On Site Water – Sheet Flows	>	Level Spreader / Diffuser/ Geo spillway		Coarse rock / sandbag check dam		Excavated sediment trap with spill weir	Filter bag or sediment fence inlet filter	Temporary Traffic Barriers	

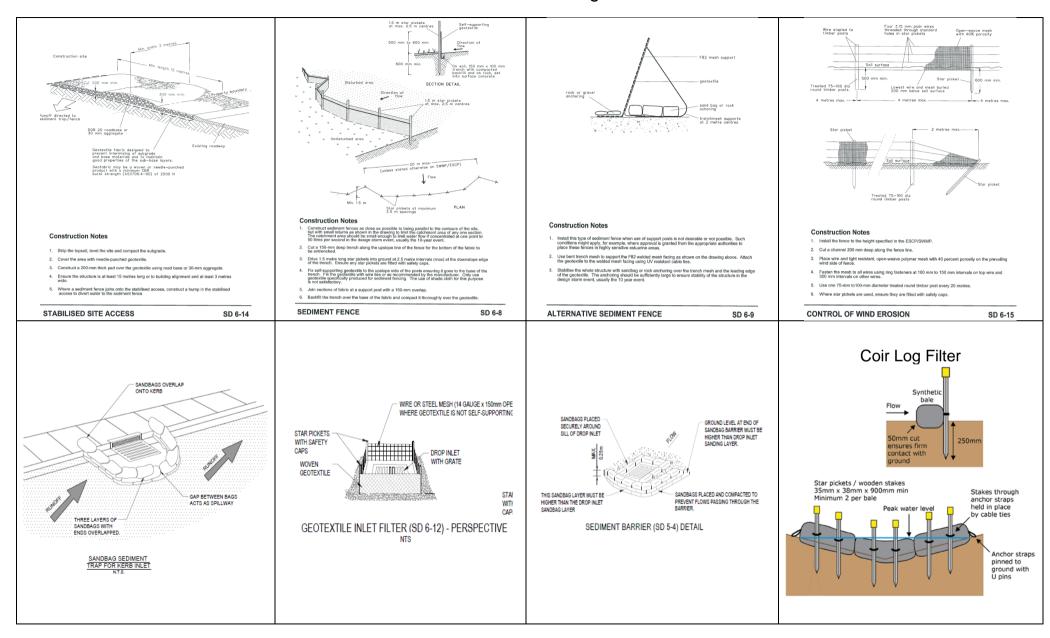
Appendix G

Standard drawings

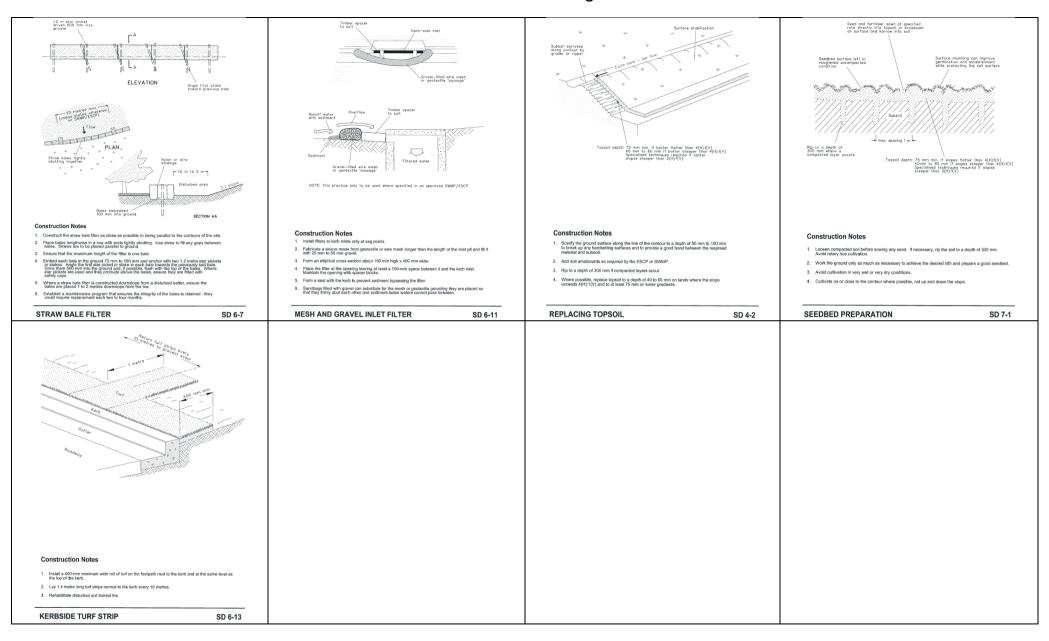
Standard Drawings



Standard Drawings



Standard Drawings



APPENDIX K

Waste Management Plan

OAKDALE WEST ESTATE

Buildings 2C-2D Waste Management Plan

Prepared for:

Goodman Property Services (Aust) Pty Limited
The Hayesbery
1-11 Hayes St
Rosebery NSW 2018



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BASIS OF REPORT

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

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

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

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
630.30081.00300-R12-v5.0	4 May 2022	Celine El-Khouri	Andrew Quinn	Andrew Quinn
630.30081.00300-R12-v4.1	4 May 2022	Celine El-Khouri	Andrew Quinn	Andrew Quinn
630.30081.00300-R12-v4.0	5 April 2022	Celine El-Khouri	Andrew Quinn	Andrew Quinn
630.30081.00300-R12-v3.1	1 April 2022	Celine El-Khouri	Andrew Quinn	Andrew Quinn
630.30081.00300-R12-v3.1	1 April 2022	Celine El-Khouri	Andrew Quinn	Andrew Quinn
630.30081-R12-v3.0	26 November 2020	Celine El-Khouri	Andrew Quinn	Andrew Quinn



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1 Introduction

1.1 Overview

SLR Consulting Australia Pty Ltd (SLR) has been commissioned by Goodman Property Services (Aust) Pty Ltd (the Client) to prepare a waste management plan (WMP) in support of a development application (DA) to Penrith City Council (Council) for Buildings 2C-1, 2C-2 and 2D on Lot 102 DP1262308 of the Oakdale West Industrial Estate (the Project).

This WMP applies to the waste generated from the site preparation, construction and operational stages of the Project and has been prepared using architectural drawings supplied by the Client and attached in Appendix A.

The relevant requirements of the SEARs issued for SSD-9794683 and SSD-7348 MOD 10 are addressed in this report as shown in Table 1.

Table 1 SSD-9794683 and SSD-7348 MOD 10 Conditions for Waste Management

Conditions	Relevant Sections in this WMP
Waste Management – Including details of the quantities and classification of waste streams generated during construction and operation and proposed storage, handling and disposal requirements.	Section 5 Section 6

1.2 Objectives

The principal objective of this WMP is to identify all potential waste likely to be generated at the Project site during construction and operational phases, including a description of how waste would be handled, processed and disposed of, or re-used or recycled, in accordance with Council's requirements.

The specific objectives of this WMP are as follows:

- To encourage the minimisation of waste production and maximisation of resource recovery.
- To ensure the appropriate management of contaminated and hazardous waste.
- To identify procedures and chain of custody records for waste management.
- To assist in ensuring that any environmental impacts during the operational life of the Project comply with Council's development consent conditions and other relevant regulatory authorities.

1.3 Review of WMP

This WMP is not a static document. It is a working document that requires review and updating to ensure ongoing suitability for the proposed on-going operations at the site.

This WMP will be reviewed and updated:

- To remain consistent with waste and landfill regulations and guidelines
- If changes are made to site waste and recycling management, or
- To take advantage of new technologies, innovations and methodologies for waste or recycling management.



Goodman Property Services (Aust) Pty Limited Oakdale West Estate Buildings 2C-2D Waste Management Plan

Copies of the original WMP and its future versions should be retained by the building manager. Changes made to the WMP, as well as the reasons for the changes made, should be documented by the building manager as part of the review process.



Project Description 2

2.1 **Overview of Proposed Development**

The Client is developing the Oakdale West Industrial Estate site (Oakdale West) at Lot 102 DP1262308 in Kemps Creek. This site is primarily a greenfield site and will be comprised of five industrial warehouse and office precincts, including internal roads, car parking spaces and hardstand. The Project site for Building 2C-2D is located in Precinct 2. A site plan of the Project is shown in Figure 1.

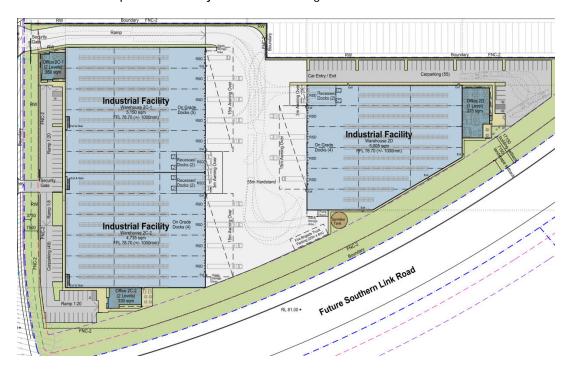


Figure 1 The Project Site Plan

Overview of Proposed Construction Work 2.2

The proposed work for Buildings 2C to 2D is expected to include site preparation and construction activities.

The anticipated construction works for the Project includes the construction of the below:

- Three warehouse buildings, 2C-1, 2C-2 and 2D
- Three two-level ancillary office, 2C-1, 2C-2 and 2D
- Truck and car parking areas and associated site hardstands, and
- Minor landscaping areas, a sprinkler tank and a pump room.

2.3 **Overview of Proposed Operations**

SLR understands that the Project will be used as a warehouse and distribution centre, with anticipated operations 24 hours a day.



3 Better Practice Waste Management and Recycling

3.1 Waste Management Hierarchy

This WMP has been prepared in line with the waste management hierarchy shown in Figure 2, which summarises the objectives of the Waste Avoidance and Resource Recovery Act 2001.

The waste management hierarchy comprises the following principles, from most to least preferable:

- Waste avoidance, prevention or reduction of waste generation. Achievable through better design and purchasing choices.
- Waste reuse, reuse without substantially changing the form of the waste.
- Waste recycling, treatment of waste that is no longer usable in its current form to produce new products.
- Energy recovery, processing of residual waste materials to recover energy.
- Waste treatment, reduce potential environmental, health and safety risks.
- Waste disposal, in a manner that causes the least harm to the natural environment.



Image from NSW EPA (2014) NSW Waste Avoidance and Resource Recovery Strategy 2014-21.

Figure 2 Waste management hierarchy

3.2 Benefits of Adopting Better Practice

Adopting better practice principles in waste minimisation offers significant benefits for organisations, stakeholders and the wider community. Benefits from better practice waste minimisation include:

- Improved reputation of an organisation due to social and environmental responsibility.
- Lowered consumption of non-renewable resources.
- Reduced environmental impact, for example, pollution, from materials manufacturing and waste treatment.
- Reduced expenses from lower waste disposal.
- Providing opportunities for additional revenue streams through beneficial reuse.



4 Waste Legislation and Guidance

The legislation and guidance outlined in Table 2 below should be referred to during the site preparation, construction and operational phases of the Project.

Table 2 Legislation and guidance

Legislation and Guidance	Objectives
Council legislation and guidelines	
Penrith Local Environmental Plan (LEP) 2010 ¹	The Penrith LEP came into force for the entire Penrith local government area on 25 February 2015 and provides the legal framework of the Penrith Development Control Plan, including land use and development permitted in a set zone. The LEP also contains provisions to conserve local heritage and protect sensitive land.
Penrith Development Control Plan (DCP) 2014 ²	The Penrith DCP came into effect on 17 April 2015 and supports provision of the LEP planning controls by providing detailed planning and design guidelines. The DCP has been prepared in accordance with the Waste Avoidance and Resource Recovery Act 2001. One of the objectives of the DCP is to assist in reducing Penrith's ecological footprint by encouraging the diversion of waste from landfill. This WMP specifically addresses Part C5 – Waste Management of the DCP and the Waste Management Guidelines for Industrial, Commercial and Mixed Use.
Waste Strategy 2017-2026, Penrith City Council	Council's waste strategy sets out the waste management targets for the Penrith local government area including working towards reduced waste generation and increased landfill diversion. The strategy was prepared in consultation with the community and informed by waste audit results. The strategy defines the actions required to reach the targets, including actions for waste diversion from landfill, resource recovery, technology innovation, community education and resource recovery facilities.
State and National legislation and gu	idelines
Building Code of Australia (BCA) and relevant Australian Standards	The BCA has the aim of achieving nationally consistent, minimum necessary standards of relevant health and safety, amenity and sustainability objectives efficiently.
Council of Australian Governments National Construction Code 2016	The National Construction Code 2016 sets the minimum requirements for the design, construction and performance of buildings throughout Australia.
NSW EPA's Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities 2012	These better practice guidelines present information on waste minimisation and resource recovery as well as information on commonly used waste management provisions. The guidelines also provide benchmarks for assessing waste production rates in Australia.
NSW Waste and Sustainable Materials Strategy 2041: Stage 1 – 2021-2027	Replacing the NSW Waste Avoidance and Resource Recovery Strategy (2014-21), the NSW Waste and Sustainable Materials Strategy 2041 focuses on the transition of NSW to a circular economy. The strategy focuses on minimising what is thrown away, and to use and reuse resources more efficiently, making them as productive as possible. The strategy identifies the need to identify infrastructure needs, the mandating of separation of some organic waste streams, and incentivising biogas generation from waste materials.

 $^{2\,\}underline{\text{https://www.penrithcity.nsw.gov.au/building-development/planning-zoning/planning-controls/development-control-plans}$



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¹ https://legislation.nsw.gov.au/#/view/EPI/2010/540

Legislation and Guidance	Objectives			
NSW EPA Resource Recovery	The NSW EPA has issued a number of resource recovery orders and resource recovery exemptions under the POEO (Waste) Regulation 2014 for a range of waste that may be recovered for beneficial re-use. These waste typically include those from demolition and construction works, as well as operational waste such as food waste.			
Orders and Resource Recovery Exemptions	 Resource recovery orders present conditions which generators and processors of wa must meet to supply the waste material for beneficial re-use. 			
	Resource recovery exemptions contain the conditions which consumers must meet to use waste for beneficial re-use.			
NSW EPA's Waste Classification Guidelines 2014	The NSW EPA Waste Classification Guidelines assists waste generators to effectively manage, treat and dispose of waste to ensure the environmental and human health risks associated with waste are managed appropriately and in accordance with the POEO Act 1997 and is associated regulations.			
Protection of the Environment Operations Act (POEO) 1997 and Amendment Act 2011	The POEO Act 1997 and POEO Amendment Act 2011 are administered by the NSW Environment Protection Authority (NSW EPA) to enable the NSW Government to establish instruments for setting environmental standards, goals, protocols and guidelines. They outline the regulatory requirements for lawful disposal of waste generated during the demolition, construction and operational phases of a development, as well as the system for licencing waste transport and disposal.			
The Work Health and Safety Regulation 2017	The Work Health and Safety Regulation 2017 provide detailed actions and guidance associated with the topics discussed in The Work Health and Safety Act 2011. The primary aim of the regulation is to protect the health and safety of workers and ensure that risks are minimised in work environments. Workplaces are to ensure that they are compliant with the requirements specified in the regulations. The regulations discuss items such as actions that are prohibited or obligated in work environments, the requirements for obtaining licences and registrations, and the roles and responsibilities of staff in workplaces.			
	The Waste Avoidance and Resource Recovery Act 2001 aims to promote waste avoidance and resource recovery and repeals the Waste Minimisation and Management Act 1995. Specific objectives of the Waste Avoidance and Resource Recovery Act 2001 include:			
	encouraging efficient use of resources			
Waste Avoidance and Resource	 minimising the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste 			
Recovery Act 2001	 ensuring industry and the community share responsibility in reducing/dealing with waste and 			
	 efficiently funding of waste/resource management planning, programs and service delivery. 			
	As of 2016, the addition to the Act of Part 5 defines the legislative framework for the "Return and Earn Container Deposit Scheme" whereby selected beverage containers can be returned to State Government authorities for a monetary refund.			



5 Site Preparation and Construction Waste and Recycling Management

5.1 Targets for Resource Recovery

Targets for new development are expected to contribute to state-specific targets. The NSW Waste and Sustainable Materials Strategy 2041 (DPIE, 2021) sets a target of 80% average recovery rate from all waste streams by 2030. Analysis by DPIE (2021) indicates that construction and demolition waste recovery rates in 2018-2019 were 77%.

Additionally, in the interests of Council's additional commitments to waste management controls, the construction and excavation procedures should endeavour to reach the target mentioned in the from the DCP of reducing the volume of demolition, construction and fit out waste, including excavation, going to landfill by 76%.

It is anticipated that the waste minimisation measures in the following sections will assist the Project to meet these targets. Waste reporting and audits can be used to determine the actual percentage of wastes that have been recycled during the site preparation and construction stage of the Project.

5.2 Waste Streams and Classifications

The site preparation and construction of the Project is likely to generate the following broad waste streams:

- Site clearance waste
- Construction waste
- Plant maintenance waste
- Packaging waste, and
- Work compound waste from on-site employees.

A summary of likely waste types generated from site preparation and construction activities, along with their waste classifications and proposed management methods, is provided in Table 3.

For further information on how to classify a waste type refer to the NSW EPA (2014) Waste Classification Guidelines³. Further information on managing site preparation and construction waste is available from the NSW EPA website⁴.



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³ Available online from https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines

⁴ http://www.epa.nsw.gov.au/your-environment/waste/industrial-waste/construction-demolition

 Table 3
 Potential waste types and their management methods

Waste Types	NSW EPA Waste Classification	Proposed Management Method			
Site Clearance	'				
Green waste including timber, pine and particle board	General solid waste (non-putrescible)	Separated, some chipped and stored on-site for landscaping, remainder to landscape supplies or off-site recycling. Stumps and large trees to landfill.			
Clean fill	General solid waste (non-putrescible)	On-site re-use			
Contaminated fill	To be classified subject to the results of testing	Off-site treatment or disposal to landfill			
Excavated natural material (ENM) or virgin excavated natural material (VENM)	General solid waste (non-putrescible)	On-site re-use of topsoil for landscaping of the site, off-site beneficial re-use or send to landfill site.			
Construction					
Sediment fencing, geotextile materials	General solid waste (non-putrescible)	Reuse at other sites where possible or disposal to landfill			
Concrete	General solid waste (non-putrescible)	Off-site recycling for filling, levelling or road base			
Bricks and pavers	General solid waste (non-putrescible)	Cleaned for reuse as footings, broken bricks for internal walls, crushed for landscaping or driveway use, off-site recycling			
Gyprock or plasterboard	General solid waste (non-putrescible)	Off-site recycling or returned to supplier			
Sand or soil	General solid waste (non-putrescible)	Off-site recycling			
Metals such as fittings, appliances and bulk electrical cabling, including copper and aluminium	General solid waste (non-putrescible)	Off-site recycling at metal recycling compounds and remainder to landfill			
Conduits and pipes	General solid waste (non-putrescible)	Off-site recycling			
Timber	General solid waste (non-putrescible)	Off-site recycling, Chip for landscaping, Sell for firewood Treated: reused for formwork, bridging, blocking, propping or second-hand supplier Untreated: reused for floorboards, fencing, furniture, mulched second hand supplier Remainder to landscape supplies.			
Doors, Windows, Fittings	General solid waste (non-putrescible)	Off-site recycling at second hand building supplier			
Insulation material	General solid waste (non-putrescible)	Off-site disposal			
Glass	General solid waste (non-putrescible)	Off-site recycling, glazing or aggregate for concrete production			
Asbestos	Hazardous waste	Off-site disposal at a licenced landfill facility.			



Waste Types	NSW EPA Waste Classification	Proposed Management Method
Fluorescent light fittings and bulbs	Hazardous waste	Off-site recycling or disposal; contact FluoroCycle for more information ⁵
Paint	Hazardous waste	Off-site recycling, Paintback collection ⁶ or disposal
Synthetic Rubber or carpet underlay	General solid waste (non-putrescible)	Off-site recycling; reprocessed and used in safety devices and speed humps
Ceramics including tiles	General solid waste (non-putrescible)	Off-site recycling at a crushing and recycling company
Carpet	General solid waste (non-putrescible)	Off-site recycling or disposal; reused for landscaping, insulation or equestrian uses
Plant Maintenance		
Empty oil and other drums or containers, such as fuel, chemicals, paints, spill clean ups	Hazardous waste: Containers were previously used to store Dangerous Goods (Class 1, 3, 4, 5 or 8) and residues have not been removed by washing or vacuuming. General solid waste (non-putrescible): Containers have been cleaned by washing or vacuuming.	Transport to comply with the transport of Dangerous Goods Code applies in preparation for off-site recycling or disposal at licensed facility.
Air filters and rags	General solid waste (non-putrescible)	Off-site disposal
Oil filters	Hazardous waste	Off-site recycling
Batteries	Hazardous waste	Off-site recycling, Contact the Australian Battery Recycling Initiative ⁷ for more information
Packaging		
Packaging materials, including wood, plastic, including stretch wrap or LLPE, cardboard and metals General solid waste (non-putrescible) Off-site		Off-site recycling
Wooden or plastic crates and pallets	General solid waste (non-putrescible)	Reused for similar projects, returned to suppliers, or off-site recycling. Contact Business Recycling for more information ⁸
Work Compound and Associated O	ffices	
Food Waste	General solid (putrescible) waste	Dispose to landfill with general garbage



 $^{^{5} \, \}text{Available online from} \, \underline{\text{http://www.fluorocycle.org.au/}} \, \text{or} \, \underline{\text{http://www.environment.gov.au/settlements/waste/lamp-mercury.html}} \,$

⁶ Available online from https://www.paintback.com.au/

⁷ http://www.batteryrecycling.org.au/home

⁸ Available online from http://businessrecycling.com.au/search/

Waste Types	NSW EPA Waste Classification	Proposed Management Method
Recyclable beverage containers including glass and plastic bottles, aluminium cans and steel cans	General solid waste (non-putrescible)	Co-mingled recycling at off-site licensed facility or deliver to local NSW container deposit scheme 'Return and Earn' facility ⁹
Clean paper and cardboard	General solid waste (non-putrescible)	Paper and cardboard recycling at off-site licensed facility
General domestic waste generated by workers such as soiled paper and cardboard and polystyrene	General solid waste (non-putrescible) mixed with putrescible waste	Disposal at landfill

5.3 Site Preparation Waste Types and Quantities

According to communication with the Client, bulk earthworks, including for services, and estate road infrastructure has been completed at Oakdale West. As part of this DA, minor change to civil design will be undertaken to accommodate the Project. SLR understands that cut and fill quantities for the Project have been undertaken by AT&L.

Section 5.3.1 of the Penrith DCP recommends that measures are taken to minimise site disturbance and limit unnecessary excavation. The Penrith DCP also states that if excess material is transported offsite, Council is to be informed of the quantity, quality, method of transport and where the material will be disposed.

Should the Project's site preparation work encounter asbestos-contaminated materials, other contaminated materials or unexpected finds, the contractor should refer to its relevant site management plan, and Section 5.7.4 of this WMP. All excavated spoil should be classified by an appropriately experienced environmental consultant and separated into contaminated materials, if any, uncontaminated fill, ENM or VENM.

5.4 Construction Waste Types and Quantities

The Construction Site Manager will need to specify the types and quantities of waste produced during construction and on this basis, the numbers and capacity of skip bins can be determined.

The Penrith DCP does not provide waste generation rates for construction activities. In the absence of readily available construction waste generation rates from Council, SLR has adopted the waste generation rates from Appendix A of The Hills Development Control Plan (The Hills DCP) 2012 for estimating the types and quantities of waste generated from construction of the Project.

SLR has adopted the 'Factory' and 'Office' waste generation rates to measure waste expected from the Project, as the construction of a factory and office is the most relevant in representing the construction of an industrial warehouse and office precinct.

In the absence of readily available published information for 'Carpark' construction waste generation rates, SLR has developed 'Carpark' construction rates based on the 'Office' rates by:

• Removing timber, bricks and gyprock as these materials are unlikely to be present in significant quantities in a modern carpark structure, and

⁹Available online from http://returnandearn.org.au/





• Increasing the rates for concrete, sand or soil, metal and 'other', in proportion, to maintain the total assumed tonnage per 1000 m² of construction.

The waste generation rates are shown in Table 4.

Table 4 Waste generation rates for the construction of the Project

Rate Type	Floor Area (m²)	Waste types and quantities (m³)						
Rate Type	rioor Area (iii)	Timber	Concrete	Bricks	Gyprock	Sand or Soil	Metal	Other
Factory	1,000	0.25	2.10	1.65	0.45	4.80	0.60	0.50
Office	1,000	5.1	18.8	8.5	8.6	8.8	2.75	5
Carpark	1,000		30.6			14.3	4.5	8.1

These waste generation rates are used to estimate the waste generated from the construction of the Project. The anticipated construction waste quantities for the Project are shown below. Based on communication with the Client, SLR understands that these rates are likely to produce larger quantities of construction waste than are expected for the Project as the Project is a development for warehouse and distribution, rather than manufacturing. For the purpose of developing an estimate of the construction waste quantities generated by the Project, these rates have been applied, as they are the most representative which can be currently found in the public domain.

The waste generation rates for 'Factory' are applied to calculate the waste quantities from the construction of the warehouse. The 'Office' waste generation rates are applied to calculate the waste quantities from the offices. The 'Carpark' waste generation rates are applied to calculate the waste quantities from the construction of all external hard surface areas including access roads, carparks and light duty surfaces. The areas are based on the architectural drawings attached in Appendix A.

Actual waste quantities and composition will vary; however, this estimate is provided so that the Construction Site Manager can make provision for on-site or off-site re-use and recycling opportunities. The construction waste quantities anticipated from Buildings 2C and 2D are provided below in Table 5.

Table 5 Estimated types and quantities of construction waste

		Area	Waste types and quantities (m³)						
Building	Building component	(m ²)	Timber	Concrete	Bricks	Gyprock	Sand and Soil	Metal	Other
2C-1	Warehouse 2C-1	5,150	5	15	10	5	25	5	5
26-1	Office 2C-1 (Two levels)	350	5	10	5	5	5	5	5
2C-2	Warehouse 2C-2	4,735	5	10	10	5	25	5	5
20-2	Office 2C-2 (Two levels)	330	5	10	5	5	5	5	5
2D	Warehouse 2D	5,005	5	15	10	5	25	5	5
20	Office 2D (One level)	375	5	10	5	5	5	5	5
	Hardstand area	7,900	-	245	-	-	115	40	65
	Light Duty Area	3,800	-	120	-	-	55	20	35
	Total	27,645	30	435	45	30	260	90	130

Waste estimates have been rounded up to the nearest 5 m³.



A waste management plan form provided by Council is attached in Appendix B. The form is also available on Council's website¹⁰. This is to be updated by the Site Manager once waste streams, estimated quantities, and final disposal locations and recycling services have been identified.

5.5 Waste Avoidance

In accordance with the Penrith DCP and better practice waste management, the Building Contractor, Building Designer and/or equivalent roles should:

- Develop a purchasing policy based on the approximate volumes of materials to be used so that the correct quantities are purchased.
- Arrange for delivery of materials on an 'as needed' basis to avoid material degradation through weathering and moisture damage.
- Communicate strategies to handle and store waste to minimise environmental, health and amenity impacts.
- Select materials with a low environmental impact over the lifecycle of the building.
- Choose timber from certified plantations and avoid unsustainable timber imports including western red cedar, oregon, meranti, luan or merbau.
- Use leased equipment rather than purchase and disposal.
- Minimise site disturbance and unnecessary excavation.
- Incorporate existing trees and shrubs into the landscape plan.
- Grouping wet areas together to minimise the amount of pipe work required.
- Design the Project to require standard material sizes or make arrangements with manufacturing groups for the supply of non-standard material sizes.
- Design works for de-construction.
- Reduce packaging waste by:
 - Returning packaging to suppliers where practicable to reduce waste further along the supply chain
 - Purchasing in bulk
 - Requesting cardboard or metal drums rather than plastics
 - Requesting metal straps rather than shrink wrap, and
 - Using returnable packaging such as pallets and reels.
- Use prefabricated materials.
- Select materials for Project works with low embodied energy properties or materials that have been salvaged or recycled for the construction of the Project including concrete that utilises slag and fly ash content, structural and reinforced steel that uses recycled steel content or bulk insulation products that contain recycled content, such as recycled glass in glass-wool.
- Preferentially use paints, floor coverings and adhesives with low VOC (volatile organic compound) content.

 $^{^{10}\,}https://www.penrithcity.nsw.gov.au/images/documents/forms/Waste_Management_Plan_Application_Form.pdf$



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- Reduce the use of polyvinyl chloride products.
- Implement measures to prevent the occurrence of windblown litter, dust and stormwater pollution.
- Ensure subcontractors are informed of and implement site waste minimisation and management procedures.

5.6 Reuse, Recycling and Disposal

Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, will be conducted. Only wastes that cannot be cost effectively reused or recycled are to be sent to landfill or appropriate disposal facilities.

Refer to Table 3 for an outline of the proposed reuse, recycling and disposal methods for potential site preparation and construction waste streams generated by the Project.

In accordance with the Penrith DCP and best practice waste management, the following specific procedures should be implemented:

- Ensure the site's project management of the site includes minimising waste generation, requiring the appropriate storage and timely collection of waste materials, and maximising re-use or recycling of materials.
- Store wastes on site appropriately to prevent cross-contamination and guarantee the highest possible re-use value.
- Consider the potential of any new materials to be re-used and recycled at the end of the Project's life.
- Determine opportunities for the use of prefabricated components and recycled materials.
- Strip topsoil from areas designated for excavation and store it on site for reuse.
- Reuse excavation material will be on-site where possible.
- Re-use formwork where appropriate.
- Retain roofing material cut-offs for re-use or recycling.
- Retain used crates for storage purposes unless damaged.
- Recycle cardboard, glass and metal wastes.
- Recycle or dispose of solid waste timber, brick, concrete, asphalt and rock, where such waste cannot be re-used on site, to an appropriately licenced construction and demolition waste recycling facility or an appropriately licenced landfill.
- Dispose of all asbestos and/or hazardous wastes in accordance with SafeWork NSW and NSW EPA requirements.
- Deliver batteries and florescent lights to drop off-site recycling facility.
- Return excess materials and packaging to the supplier or manufacturer.
- Dispose of all garbage via a council approved system.



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5.7 Waste Storage and Servicing

5.7.1 Waste Segregation and Storage

As outlined in the Penrith DCP, waste materials produced from site preparation and construction activities are to be separated at the source and stored separately on-site. It is anticipated that the Project will provide enough space on-site for separate storage, for example, separate skip bins or appropriately managed stockpiles, of the following waste types:

- Bricks, concrete and scrap metal
- Metal and steel, in a condition suitable for recycling at metal recycling facilities
- Timber
- Glass
- Hardstand rubble
- Uncontaminated excavation spoil, if present
- Contaminated excavation spoil, if present
- Hazardous waste, if present
- Paper and cardboard
- General co-mingled recycling waste, and
- Non-recyclable general waste.

If there is insufficient space on-site for full segregation of waste types, the Site Manager, or equivalent role, should consult with the waste and recycling collection contractor to confirm which waste types may be comingled prior to removal from the site.

5.7.2 Waste Storage Areas

Waste storage areas will be accessible and allow enough space for storage and servicing requirements. The storage areas will also be flexible in order to cater for change of use throughout the project. Where space is restricted, dedicated stockpile areas are to be delineated on the site, with regular transfers to dedicated skip bins for sorting.

All waste placed in skips or bins for disposal or recycling will be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site. Waste containers and storage areas are to be kept clean and in a good state of repair.

As specified in the Penrith DCP, areas designated for waste storage should:

- Allow unimpeded access by site personnel and waste disposal contractors
- Consider environmental factors which could potentially cause an impact to the waste storage, such as slope, drainage and the location of watercourses and native vegetation
- Allow enough space for the storage of garden waste and other waste materials on-site



- Employ adequate environmental management controls to prevent off-site migration of waste materials and contamination from the waste. For example, consideration of slope, drainage, proximity relative to waterways, stormwater outlets and vegetation
- Consider visual amenity, safety, accessibility and convenience in their selection, and
- Not present hazards to human health or the environment.

5.7.3 Waste Servicing and Record Keeping

The Site Manager or equivalent role is to:

- Arrange for suitable waste collection contractors to remove any construction waste from site
- Ensure waste bins are not filled beyond recommended filling levels
- Ensure that all bins and loads of waste materials leaving site are covered
- Maintain waste disposal documentation detailing, at a minimum:
- Descriptions and estimated amounts of all waste materials removed from site
- Details of the waste and recycling collection contractors and facilities receiving the waste and recyclables
- Records of waste and recycling collection vehicle movements, for example, date and time of loads removed, licence plate of collection vehicles, tip dockets from receiving facility, and
- Waste classification documentation for materials disposed to off-site recycling or landfill facilities.
- Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities such as Council, SafeWork NSW or NSW EPA, and
- Remove waste during hours approved by Council.

If skips and bins are reaching capacity, removal and replacement should be organised as soon as possible. All site generated building waste collected in the skips and bins will leave the site and be deposited in the approved site lawfully able to accept them.

5.7.4 Contaminated or Hazardous Waste Management

During the site preparation and construction phases, SLR recommends that a qualified and certified contractor is engaged to remove all contaminated or hazardous materials, for example, asbestos, and dispose of all contaminated or hazardous waste at an appropriately licenced facility.

All asbestos and other hazardous waste must be handled according to appropriate legislation and regulation including the Work Health and Safety Regulation 2017.

In accordance with the Penrith DCP, hazardous waste management at the site may require a licence from the EPA and approval from Council. If hazardous waste is identified for removal, Council and NSW EPA are to be consulted prior to undertaking any hazardous waste removal.



5.8 Site Inductions

All staff, including sub-contractors and labourers, employed during the site preparation and construction phases of the Project must undergo induction training regarding waste management for the Site.

Induction training is to cover, as a minimum, an outline of the WMP including:

- Legal obligations and targets
- Emergency response procedures on-site
- Waste priorities and opportunities for reduction, reuse and recycling
- Waste storage locations and separation of waste
- Procedures for suspected contaminated and hazardous wastes
- Waste related signage
- The implications of poor waste management practices, and
- Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities.

It is the responsibility of the Site Manager or Building Contractor to notify Council of the appointment of waste removal, transport or disposal contractors.

5.9 Signage

Standard signage is to be posted in all waste storage and collection areas. All waste containers should be labelled correctly and clearly to identify stored materials.

Signs approved by the NSW EPA for labelling of waste materials are available online¹¹ and should be used where applicable. A selection of signs prepared by NSW EPA is provided in Figure 3.



Figure 3 Examples of NSW EPA labels for waste skips and bins

¹¹ NSW EPA approved waste materials signage https://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/business-government-recycling-signs



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5.10 Monitoring and Reporting

The following monitoring practices are to be undertaken to improve site preparation and construction waste management and to obtain accurate waste generation figures:

- Conduct waste audits of current projects where feasible.
- Note waste generated and disposal methods.
- Look at past waste disposal receipts.
- Record this information to track waste avoidance, reuse and recycling performance and to help in waste estimations for future waste management plans.

As specified in The Penrith DCP, records of waste volumes recycled, reused or contractor removed are to be maintained. This can include dockets or receipts verifying recycling and disposal in accordance with this WMP. This evidence should also be presented to regulatory bodies when required.

Daily visual inspections of waste storage areas will be undertaken by site personnel and inspection checklists and logs recorded for reporting to the Site Manager on a weekly basis or as required. These inspections will be used to identify and rectify any resource and waste management issues.

Waste audits are to be carried out by the Building Contractor to gauge the effectiveness and efficiency of waste segregation procedures and recycling and reuse initiatives. Where audits show that the above procedures are not carried out effectively, additional staff training will be undertaken and signage re-examined.

5.11 Roles and Responsibilities

All personnel have a responsibility for their own environmental performance and compliance with all legislation. It will be the responsibility of the Building Contractor to implement the WMP, and an employee and subcontractor responsibility to ensure that they always comply with the WMP.

Where possible, an Environmental Management Representative should be appointed for the Project. Suggested roles and responsibilities are provided in Table 6.

Table 6 Suggested roles and responsibilities for site preparation and construction waste management

Responsible Person	General Tasks			
Construction Site	Ensuring plant and equipment are well maintained.			
Manager	Ordering only the required amounts of materials.			
	Keeping materials segregated to maximise reuse and recycling.			
	Ultimately responsible for routinely checking waste sorting and storage areas for cleanliness, hygiene and safety issues, contaminated waste materials, and also ensuring that all monitoring and audit results are well documented and carried out as specified in the WMP.			
Construction Environmental Manager	Approaching and establishing the local commercial reuse of materials where reuse on-site is not practical.			
or equivalent	Establishing separate skips and recycling bins for effective waste segregation and recycling purposes.			
	Ensuring staff and contractors are aware of site requirements.			
	Provision of training of the requirements of the WMP and specific waste management strategies adopted for the Project.			



Responsible Person	General Tasks
	Contaminated waste management and approval of off-site waste transport, disposal locations and checking licensing requirements.
	Approval of off-site waste disposal locations and checking licensing requirements.
	Assessment of suspicious potentially contaminated materials, hazardous materials and liquid wastes.
	Monitoring, inspection and reporting requirements.

Daily visual inspections of waste storage areas may be delegated to other on-site staff. All subcontractors will be responsible for ensuring that their work complies with the WMP through the project induction and contract engagement process.



6 Operational Waste Management

6.1 Targets for Resource Recovery

Targets for new development are expected to contribute to state-specific targets. The NSW Waste and Sustainable Materials Strategy 2041 (DPIE, 2021) sets a target of 80% average recovery rate from all waste streams by 2030. Analysis by DPIE (2021) indicates that the commercial and industrial waste recovery rate in 2019 was 53%.

It is anticipated that the waste minimisation measures in the following sections will assist the Project to meet the state's targets. Waste reporting and audits can be used to determine the actual percentage of waste that are being, or have been, recycled during operation.

6.2 Waste Streams and Classifications

The operation of the Project is anticipated to generate the following broad waste streams:

- Domestic wastes generated by employees, including food wastes
- Bulk packaging wastes, including polystyrene, plastic wrapping and cardboard boxes
- Office waste
- Garden organic waste from landscaped areas
- Bulky waste items such as furniture and e-waste, and
- Stores, plant and general maintenance wastes.

Potential ongoing waste types, their associated waste classifications, and management methods are provided in Table 7. For further information on how to determine a waste's classification, refer to the NSW EPA (2014) Waste Classification Guidelines. Suggestions for recycling drop off locations and contacts can be found on https://businessrecycling.com.au/ for each waste type.

Table 7 Potential waste types, classifications and management methods for operational waste

Waste Types	NSW EPA Classification	Proposed Management Method			
General Operations					
Clean office paper	General solid (non-putrescible) waste	Paper recycling at off-site licensed facility			
Cardboard including bulky cardboard boxes	General solid (non-putrescible) waste	Cardboard recycling at off-site licensed facility			
Recyclable beverage containers, glass and plastic bottles, aluminium cans, steel cans	General solid (non-putrescible) waste	NSW container deposit scheme 'Return and Earn', container recycling at off-site licensed facility			
Food waste	General solid (putrescible) waste	Dispose to landfill with general garbage			
Batteries	Hazardous waste	Off-site recycling, alternatively contact the Australian Battery Recycling Initiative for more information			



Waste Types	NSW EPA Classification	Proposed Management Method	
Mobile Phones	Hazardous waste	Off-site recycling; can be taken to the Mobile Muster program. Contact Mobile Muster for more information	
Bulky polystyrene	General solid (non-putrescible) waste	Off-site recycling or disposal at landfill	
Furniture	General solid (non-putrescible) waste	Off-site reuse or disposal to landfill	
E-waste	Hazardous waste	Off-site recycling	
General garbage, including non-recyclable plastics	General solid (putrescible and non-putrescible) waste	Disposal at landfill	
Maintenance			
Glass, other than containers	General solid (non-putrescible) waste	Off-site recycling	
Light bulbs and fluorescent tubes	Hazardous waste	Off-site recycling or disposal, contact FluoroCycle ¹² or Lamp Recyclers ¹³ for more information	
Cleaning chemicals, solvents, area wash downs, empty oil or paint drums, chemical containers	Hazardous waste if containers used to store Dangerous Goods (Class 1, 3, 4, 5 or 8) and residues have not been removed by washing or vacuuming. General solid (non-putrescible) waste if containers cleaned by washing or vacuuming.	Transport to comply with the transport of Dangerous Goods Code applies in preparation for off-site recycling or disposal at licensed facility.	
Garden organics - lawn mowing, tree branches, hedge cuttings, leaves	General solid (non-putrescible) waste	Reuse on-site or contractor removal for recycling at licenced facility	

6.3 Estimated Quantities of Operational Waste

6.3.1 Waste generation

SLR has adopted the 'Offices' and 'Warehouse' waste generation rates from The Penrith DCP Industrial, Commercial and Mixed-Use Waste Management Guidelines for estimating the type and quantities of waste generated from the operational activities of the Project. The operational waste generation rates used are shown below in Table 8.

Table 8 Waste generation rates applied to the operations of the Project

Type of Premises	General Waste Generation (L/100 m²/day)	Recycling Generation (L/100 m²/day)
Warehouse	10	10
Offices	10	10

Using the waste generation rates in Table 8 above, the approximate weekly waste quantities for the Project have been calculated. The operational waste quantities were additionally calculated based on the below assumptions:



¹² https://www.fluorocycle.org.au/

¹³ https://www.lamprecyclers.com.au/

Buildings 2C-2D
Waste Management Plan

- The floor areas as presented on the architectural drawings shown in Appendix A, and
- A week comprising seven days of operation.

The estimated quantities of operational waste generated by the Project are shown in Table 9.

Table 9 Estimated quantities of operational general waste and recycling

Building	Building component	Area (m²)	(L/day)		(L/week)	
building			General Waste	Recycling	General Waste	Recycling
2C-1	Warehouse 2C-1	5,150	515	515	3,605	3,605
20-1	Office 2C-1 (Two levels)	350	35	35	245	245
Total (2C-	Total (2C-1)		550	550	3,850	3,850
20.2	Warehouse 2C-2	4,735	475	475	3,325	3,325
2C-2	Office 2C-2 (Two levels)	330	35	35	245	245
Total (2C-	Total (2C-2)		510	510	3,570	3,570
20	Warehouse 2D	5,005	505	505	3,535	3,535
2D	Office 2D (One level)	375	40	40	280	280
Total (2D)		5,380	545	545	3,815	3,815

Waste quantity estimates have been rounded up to the nearest 5 L.

6.3.2 Additional Types of Operational Waste

Based the Project's proposed operational activities, SLR understands that large quantities of the recycling stream will include pallets and plastic and cardboard packaging waste. To minimise packaging waste generated in the recyclables stream, it is recommended that packing waste is returned to the suppliers where possible. Standard pallets are recommended to be returned to their owners and non-standard and broken pallets are to be stockpiled and collected as required by a private waste contractor.

If additional collection services are required, such as secured document destruction, these can be organised with a private waste contractor who can provide additional bins and take collected waste to an off-site licenced facility.

The Project is anticipated to produce minimal quantities of garden organics. Less than 100 L of garden organics are estimated to be generated per week. This waste will be taken by a landscaping contractor who will dispose of it at an off-site licenced facility.

6.4 Waste Storage Area Size

The waste storage area for the Project must be large enough to adequately store all quantities of operational waste and recycling between collections. All waste storage room calculations have considered the bin dimensions listed in The Penrith DCP, as outlined in Table 10.

Table 10 Dimensions and approximate footprint of bins

Bin Capacity	Height (mm)	Depth (mm)	Width (mm)	Footprint (m ²)
1,100 L	1,330	1,240	1,090	1.35



To allow for ready movement of bins into and out of the bin storage area, the bin storage area is to provide a floor area of at least 200% of the total minimum bin GFA. This can also act as a contingency in the event of spikes in waste generation. Additionally, in accordance with the Penrith DCP, an additional 0.2 m is to be permitted between the bins to allow for manoeuvrability. This has been considered in the calculation of the waste storage area for each of the buildings in the Project.

The recommended storage areas do not include consideration for the storage of bulky and hazardous waste. For the additional storage space for bulky and hazardous waste, refer to Section 6.4.1.

The estimated number of bins required for weekly storage of operational waste and recycling generated by the Project are in Table 11 and are based on:

- The estimated quantities of operational waste and recycling as shown in Table 9, and
- Bin dimensions from the Penrith DCP as shown in Table 10

Table 11 Recommended number of bins and storage area for weekly operations

Location	Bins Required		Total Number of	Collections per	Recommended Storage	
Location	General Waste	Recycling	Bins	Week	Area (m²)	
Building 2C-1	2 x 1,100 L	2 x 1,100 L	4	2	10.8	
Building 2C-2	2 x 1,100 L	2 x 1,100 L	4	2	10.8	
Building 2D	2 x 1,100 L	2 x 1,100 L	4	2	10.8	

6.4.1 Bulky and Hazardous Waste Management

As outlined in the Penrith DCP, additional storage space for the bulky waste stream must be provided. This stream includes broken pallets, broken storage units, e-waste and other materials that cannot be disposed of in the general or recyclable waste stream.

The Penrith DCP does not provide storage area dimensions for bulky waste. In the absence of dimensions for bulky waste provided by Council, SLR has adopted storage area dimensions for bulky waste presented in The City of Sydney's Guidelines for Waste Management in New Developments. These are applied as they are the most recent recommendations for bulky waste storage that have been provided in guidelines for new developments in NSW and are applicable to non-residential developments. The recommended space for storing bulky waste should be at least:

- 4 m² for developments between 100 m² and 2,000 m², and
- An additional 4m² for developments over 2,000 m² and for every 20,000 m² of office space.

Using these dimensions, SLR recommends 8 m² to be allocated for bulky waste storage for each area of the development. Therefore, in addition to the recommended waste storage areas noted in Table 11, the total waste storage areas recommended for the Project are identified in Table 12.



Table 12 Total recommended storage area for operations of the Project

Location	Recommended Storage Area (m²)				
Location	Waste and Recycling	Bulky waste	Total Storage Area		
Building 2C-1	10.8	8	18.8		
Building 2C-2	10.8	8	18.8		
Building 2D	10.8	8	18.8		

This additional space can also act as a contingency in the event of spikes in waste generation and allow for additional bins. Depending on the Project's operations, this may include additional bins for the separate storage of items such as hard and soft plastics, timber, glass and metals and aluminium. Management may consider organising a skip on a monthly basis or as required to remove bulky waste items or engage a contractor to collect and transport these items for reuse, recycling or disposal at an EPA licensed facility.

The waste storage areas for the Project are shown on the architectural drawing 'Site & Warehouse Plan' in Appendix A and are labelled as 'Waste Storage Area'.

In the unlikely event of hazardous waste generation, SLR also recommends using this space to separate and manage hazardous waste. In accordance with the Penrith DCP, hazardous waste management at the site must be placed in specialised containment bins and may require a licence from the EPA and approval from Council. If hazardous waste is identified for removal, Council and NSW EPA are to be consulted prior to undertaking any hazardous waste removal. Removal is to be undertaken by appropriately licensed specialised services.

SLR recommends that waste audits be undertaken approximately one month into the operational phase of the Project to quantify actual waste generation rates. The assessment of generated waste quantities will be influenced by management, employee and tenant attitudes to recycling and disposal, and the adequacy of signage and education provided for occupants.

6.5 Waste Storage Room Location

In accordance with the Penrith DCP, the design for the waste storage areas of the Project are to take into consideration better practice waste management and recommendations from the Penrith DCP. In accordance with better practice waste management and the Penrith DCP, the waste storage area should be located so that:

- It is located away from primary street frontages
- It is near any on-site loading bays
- It is convenient, safe, functional and directly accessible to users in each tenancy and servicing collection staff, but inaccessible to the public
- It avoids pedestrian or vehicular traffic hazards likely to be caused by waste collection and storage,
- It has 1.8 m zone of unobstructed clearance between the waste storage area and the entrance.

As specified in the Penrith DCP, the nominated collection areas for each building is to be clearly nominated on site plans accompanying development applications.

6.6 Waste Storage Area Features

In accordance with better practice waste management and the Penrith DCP, the Project's waste storage areas should have the following features:



- Blend in with the design of the wider development and the surrounding streetscape
- Be well lit and well-ventilated
- Fully enclosed and walled
- Adequate vermin prevention measures
- Reduce potential noise and odour impacts
- Enhance safety for the public
- Be connected to a water outlet for washing purposes
- Equipped with a hot and cold tap-based water supply centralised mixing valve
- Floor graded to a central drainage point which is connected to the sewer
- Have water discharge from washing flow to a sewer approved by the relevant authority
- Waterproofed and sealed non-slip floor constructed in accordance with the BCA
- Waste equipment is protected from theft and vandalism
- Be fully enclosed, walled and not permit through access to other on-site waste infrastructure
- Have a minimum 2.7 m unobstructed internal room height in accordance with the BCA
- Adequate lighting and natural or mechanical ventilation in accordance with the BCA
- Provide suitable dual door access with a minimum width of 1.8 m and a minimum 1.8 m unobstructed access corridor for the service of bins
- Provide administrative management, including signage to ensure appropriate use
- Be screened from public areas, preferably with landscape buffer planting, to reduce the impacts of noise, odour and visual amenity, and
- Flexible in design to allow for future changes in operation, tenancies and uses.

6.7 Waste Servicing

Interim waste and recyclables storage units are required in the warehouse and office spaces. The units are to be collected at the end of each day and transferred by cleaners to the central waste storage room.

SLR anticipates that waste collections will be undertaken through a private contractor. The following general waste servicing access requirements should be implemented:

- Waste will be removed regularly.
- Arrangements should be in place so that the waste and recycling storage rooms are not accessible to the general public.

In accordance with the Penrith DCP, the following is required for the access provisions for of waste collection vehicles:

- Collection vehicles must be able to enter and exit the collection area in a forward direction
- Drawings must show the site's entry point, vehicle's route of travel and manoeuvring



Page 29

- Swept path models must illustrate how a standard waste collection vehicle will enter, service and exit
 the site
- A 0.5 m unobstructed clearance is required from all obstructions for the vehicle's ingress and egress manoeuvres
- For rear loaded vehicles, an additional 2 m unobstructed loading zone is required behind the vehicle for the loading of 660 L and 1,100 L bins. Additionally, a 0.5 m side clearance is required on either side of the vehicle for driver movements and accessibility
- Unobstructed access, adequate driveways and ramps of sufficient strength to support waste collection
- Access for the collection vehicles must be separate from the entry and exit driveway of any car parking areas to and from public areas
- An acoustic assessment is to accompany the DA and account for waste collection location and times, and
- A structural engineer's report is to accompany the DA and confirm that all infrastructure used for vehicle ingress and egress movements can support the waste collection vehicle's weight. The Penrith DCP consists of dimensions for waste collection vehicles.

SLR understands that a Traffic Impact Assessment has been undertaken by Ason Group for this Project, which has taken into consideration Council's requirements for waste collection vehicles, and which incorporates swept paths that illustrate access to the waste storage area. SLR also understands that an acoustic assessment has been undertaken for this Project, which accounts for traffic movements and waste collection.

Hazardous waste produced at the site will be collected by appropriately licensed specialised services.

Once a private waste contractor is engaged, a valid waste and recycling collection contract is recommended to demonstrate disposal at a waste facility lawfully able to accept it. Written evidence of the valid contract should be kept on-site.

6.8 Waste Avoidance, Reuse and Recycling Measures

6.8.1 Waste Avoidance

Waste avoidance measures include:

- Participating in take-back services to suppliers to reduce waste further along the supply chain
- Avoiding printing where possible
- Review of packaging design to reduce waste but maintain 'fit for purpose'
- Providing ceramic cups, mugs, crockery and cutlery rather than disposable items
- Purchasing consumables in bulk to avoid unnecessary packaging
- Presenting all waste reduction initiatives to staff as part of their induction program, and
- Investigating leased office equipment and machinery rather than purchase and disposal.



6.8.2 Re-use

Possible re-use opportunities include establishing systems with in-house and supply chain stakeholders to transport products in re-useable packaging where possible.

6.8.3 Recycling

Recycling opportunities include:

- Collecting and recycling e-waste
- Flatten or bale cardboard to reduce number of bins required
- Paper recycling trays provided in office areas for scrap paper collection and recycling
- Collecting printer toners and ink cartridges in allocated bins for appropriate contractor recycling, and
- Development of 'buy recycled' purchasing policy.

6.9 Communication Strategies

Waste management initiatives and management measures should be clearly communicated to building managers, owners, employees, customers and cleaners. Benefits of providing this communication include:

- improved satisfaction with services
- increased ability and willingness to participate in recycling
- improved amenity and safety
- improved knowledge and awareness through standardisation of services
- increased awareness or achievement of environmental goals and targets
- reduced contamination of recyclables stream
- increased recovery of recyclables and organics material, if implemented, and
- greater contribution to targets for waste reduction and resource recovery, the environment and heritage conservation.

To realise the above benefits, the following communication strategies should be considered:

- Use consistent signage and colour coding throughout the Project
- Ensure all staff are trained in correct waste separation and management procedures
- Provide directional signage to show location of and routes to waste storage area
- General waste and co-mingled recycling bins should be clearly labelled and colour-coded to ensure no cross contamination, where applicable
- Employees and cleaners should adhere to the WMP for compliance, in consultation with management, and
- Repair signs and labels promptly to avoid breakdown of communications.



6.10 Signage

As outlined in the Penrith DCP, the waste storage and collection areas should be provided with appropriate signage. These signs should clearly identify waste management procedures and provisions to contractors, tenants and visitors should be distributed around the Project.

Signs which clearly identify waste management procedures and provisions to staff and visitors should be distributed around the Project. Key signage considerations are:

- Clear and correct labelling on all waste and recycling bins, indicating the correct type or types of waste that can be placed into a given bin, as shown in Figure 4
- Signposts and directions to location of waste storage areas
- Clear signage in all waste storage areas to instruct users how to correctly separate waste and recycling
- Maintaining a consistent style colour scheme and system for signs throughout the Project, and
- Emergency contact information for reporting issues associated with waste or recycling management.

Colour-coded and labelled bin lids are necessary for identifying bins. All signage should conform to the relevant Australian Standard and use labels approved by the NSW EPA¹⁴. The design and use of safety signs for waste rooms and enclosures should comply with Australian Standard AS 1319 Safety Signs for the Occupational Environment and clearly describes the types of materials designated for each bin.



Figure 4 Example of bin labels for operational waste

6.11 Monitoring and Reporting

Monitoring is recommended to ensure waste and recycling management arrangements and provisions for the Project are functional, practical and are maintained to the standard outlined in this plan, at a minimum.

Visual assessments of bins and bin storage areas should be conducted by the building manager, at minimum:

- Weekly, in the first two months of operation to ensure the waste management system is sufficient for the operation, and
- Every six months, to ensure waste is being managed to the standards outlined in this document.



¹⁴ NSW EPA waste signage and label designs http://www.epa.nsw.gov.au/wastetools/signs-posters-symbols.htm

In addition, audits are to be conducted on a half-yearly basis to ensure WMP provisions are maintained.

Quantities of waste and recycling associated with disposal of waste and recycling, including dockets, receipts and other physical records should be recorded by the Building Manager. This is to allow reviews of the waste management arrangements and provisions at the site over time. Records of waste disposal should also be available to regulatory authorities such as the NSW Environmental Protection Authority and SafeWork NSW, upon request.

Any deficiencies identified in the waste management system, including, but not limited to, unexpected waste quantities, is to be rectified by the Building Manager as soon as it is practical. Where audits show that recycling is not carried out effectively, management should carry out additional staff training, signage re-examination and reviews of the waste management system where the audit or other reviewing body has deemed necessary. If this waste management plan no longer sufficiently meets the needs of the Project, review and updates to maintain suitability must be undertaken.

6.12 Roles and Responsibilities

It is the responsibility of the Building Manager, or equivalent role, to implement this WMP and a responsibility of all warehouse tenants and staff to follow the waste management procedures set out by the WMP. SLR recommends that all subcontractors enlisted by the Client are to have roles and responsibilities identified and the Project's waste management system clearly explained. A summary of recommended roles and responsibilities are provided in Table 13.

Table 13 Operational waste management responsibility allocation

Responsible Person	General Tasks
Management	Ensure the WMP is implemented throughout the life of the operation.
	Update the WMP on a regular basis (e.g. annually) to ensure the Plan remains applicable.
	Undertake liaison and management of contracted waste collections.
	Organise internal waste audits on a regular basis.
	Manage any complaints and non-compliances reported through waste audits etc.
	Perform inspections of all waste storage areas and waste management equipment on a regular basis.
	Organise cleaning and maintenance requirements for waste management equipment.
	Monitor bins to ensure no overfilling occurs.
	Ensure effective signage, communication and education is provided to alert visitors, employees and cleaners about the provisions of this WMP and waste management equipment use requirements.
	Monitor and maintain signage to ensure it remains clean, clear and applicable.
	Ensure waste and recycling storage rooms are kept tidy.
	Ensure that regular cleaning and daily transfer of bins is being undertaken by the cleaners
	Ultimately responsible for the management of all waste management equipment, cleaning requirements, waste transfer and collection arrangements.
Cleaners and Staff	Removal of general waste, recyclables, cardboard waste and hazardous waste from floor areas for transfer to centralised waste and recycling collection rooms daily or as required.
	Cleaning of all bins and waste and recycling rooms on a weekly basis or as required.
	Compliance with the provisions of this WMP.



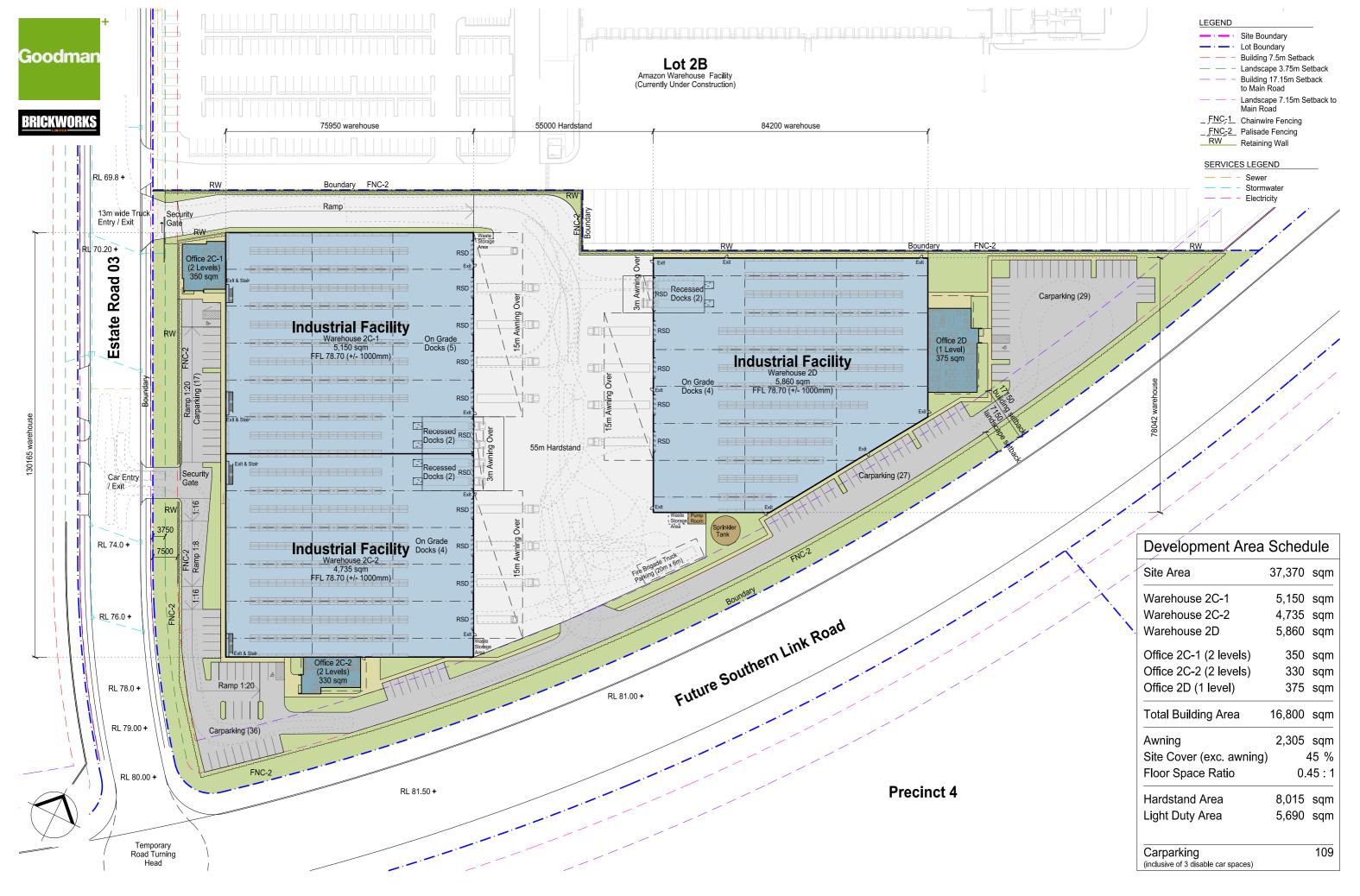
Responsible Person	General Tasks
	Removal of all garden organics waste generated during gardening maintenance activities for recycling at an off-site location or reuse as organic mulch on landscaped areas.



APPENDIX A

Architectural Drawings







APPENDIX B

Council Waste Management Plan Form



WASTE MANAGEMENT PLAN

DEMOLITION, CONSTRUCTION AND USE OF PREMISES

If you need more space to give details, you are welcome to attach extra pages to this form. PLEASE COMPLETE ALL PARTS OF THIS FORM THAT ARE RELEVANT TO YOUR DEVELOPMENT APPLICATION (DA).

IF YOU NEED MORE SPACE TO GIVE DETAILS, YOU ARE WELCOME TO ATTACH EXTRA PAGES TO THIS FORM.

Council will assess the information you provide on this form along with your attached plans. We will take into account the types and volumes of waste that could be produced as a result of your proposed development, and how you are planning to:

Surname

- minimise the amount of waste produced
- maximise re-use and recycling
- store, transport and dispose of waste safely and thoughtfully.

APPLICANT DETAILS

First name

Postal Address Street No. Street name	
Suburb	Post code
Contact phone number Email address	
DETAILS OF YOUR PROPOSED DEVELOPMI Street No. Street name	ENT
Suburb	Post code
What buildings and other structures are currently on the site?	
Briefly describe your proposed development	
Applicant Signature	Date



SECTION 1: DEMOLITION

SEC	TION 1: [DEMOLITION			
Materials		Destination			
			Re-use and recycling		Disposal
Mat	erial	Estimated volume (m² or m³)	ON-SITE* Specify proposed reuse or on-site recycling	OFF-SITE Specify contractor and recycling facility	Specify contractor and landfill site
	avation soil, rock)				
Gree	en waste				
Bric	ks				
Con	crete				
Timl (Plea type	ase specify				
Plas	terboard				
Met (Plea type	als ase specify e/s)				
Oth	er				

^{*}Please include details on the plans you submit with this form, for example location of on-site storage areas/ containers, vehicle access point/s.



SECTION 2: CONSTRUCTION

SECTION 2: CONSTRUCTION				
Materials		Destination		
		Re-use and recycling		Disposal
Material	Estimated volume (m² or m³)	ON-SITE* Specify proposed reuse or on-site recycling	OFF-SITE Specify contractor and recycling facility	Specify contractor and landfill site
Excavation (eg soil, rock)				
Green waste				
Bricks				
Concrete				
Timber (Please specify type/s)				
Plasterboard				
Metals (Please specify type/s)				
Other				

^{*}Please include details on the plans you submit with this form, for example location of on-site storage areas/ containers, vehicle access point/s.



SECTION 3: WASTE FROM ON-GOING USE OF PREMISES

generated by on-going use of the premises after the development is finished.	Expected volume (average per week)
If relevant, please give details of how you intend to manage	waste on-site after the
development is finished, for example through lease condition caretaker/manager. Describe any proposed on-site storage a attach plans showing the location of waste storage and colle	waste on-site after the ns for tenants or an on-site and treatment facilities. Please
If relevant, please give details of how you intend to manage development is finished, for example through lease condition caretaker/manager. Describe any proposed on-site storage a attach plans showing the location of waste storage and colle	waste on-site after the ns for tenants or an on-site and treatment facilities. Please
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APPENDIX L

Flora and Fauna Management Plan

Oakdale West Estate Buildings 2C-2D

Flora and Fauna Management Plan

Prepared for

Goodman Property Services (Aust.) Pty Ltd

écologique | environmental consulting

Oakdale West Estate Buildings 2C-2D - Flora and Fauna Management Plan

prepared for

Goodman Property Services (Aust.) Pty Ltd.

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Revision	Date	Description	Issued to
01	07/04/2022	Flora and Fauna Management Plan	Goodman

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1 Introduction

1.1 Background

Goodman Property Services (Aust) Pty Ltd (Goodman) obtained Development Consent SSD 7348 for the staged development of Oakdale West Industrial Estate (the Estate) comprising a warehousing and a distribution hub in Western Sydney.

An Estate wide Flora and Fauna Management Plan was prepared and approved by the NSW Minister of Environment's Secretary for the 'Concept Proposal' and Stage 1 works.

The Estate wide Flora and Fauna Management Plan has been updated as further stages and modifications to the SSD 7348 have been approved.

The most recent updated Flora and Fauna Management Plan (v.7, écologique, 11/03/2020) addressed the following Estate wide requirements:

- Vegetation and habitat clearing;
- Protection of retained native vegetation;
- Creation of fauna and snake habitat areas;
- · Installation of snake deterrrent fencing; and
- Dam decommissioning.

This Flora and Fauna Management Plan (FFMP) has been prepared as a sub-plan to the Construction Environmental Management Plan (CEMP) that is specific to the construction of Buildings 2C-2D within Precinct 2 of the Estate (see Figure 1-1).

1.2 Consent conditions

Table 1-1 summarises the relevant consent conditions fulfilled during the Estate's construction stages.

Table 1-1. Completed consent conditions

SSD reference	Consent condition	Status
SSD 7348	D88. The Applicant must prepare a Flora and Fauna Management Plan (FFMP) for Stage 1, to the satisfaction of the Planning Secretary.	Completed compliantly
SSD 7348	D89. Bulk earthworks are not to commence until the FFMP is approved by the Planning Secretary and the most recent approved version of the FFMP is to be implemented for the duration of bulk earthworks and construction.	Completed compliantly
SSD 7348	D90. Within 12 months of the date of this development consent, or as otherwise agreed with the Planning Secretary, the Applicant must retire 172 ecosystem credits to offset the removal of 4.41 hectares of native vegetation on the Site.	Amended in MOD 1
MOD 1	D90. Within 12 months of the date of this development consent, or as otherwise agreed with the Planning Secretary, the Applicant	Completed compliantly

SSD reference	Consent condition	Status
	must retire 173 ecosystem credits to offset the removal of 4.38 hectares of native vegetation on the Site.	
SSD 7348	D91. The Applicant shall establish a Biodiversity Offset Area on the Site, consistent with the area described in the RTS, in accordance with a Biodiversity Stewardship Agreement with the Biodiversity Conservation Trust. D92. The Applicant must maintain the Biodiversity Offset Area on the Site in accordance with a Biodiversity Management Action Plan approved by the Biodiversity Conservation Trust (BCT).	Deleted in MOD 1
MOD 1	SSD 7348 Conditions D91 and D92 deleted and new Condition D91 inserted as follows: D91. Within 12 months of the date of the approval of MOD 1, or as otherwise agreed with the Planning Secretary, the Applicant must prepare and implement a VMP for the restoration and rehabilitation of 4.2 ha of Riparian Corridor adjacent to Ropes Creek to meet the objectives of the Water Management Act 2000.	Amended in MOD 6
MOD 6	Approval granted to amend the VMP extent as follows: Remove locations adjacent to the future SLR (due to future disturbance from its construction) Increase the extent from 4.2 to 4.45 ha Provide a wider riparian zone, which connects to isolated patches of retained vegetation	Completed compliantly
SSD 7348	D93. Within 12 months of the date of this development consent, or as otherwise agreed with the Planning Secretary, the Applicant must: Offset 0.42ha of vegetation lost in the Erksine Park Biodiversity Corridor as a result of the WNSLR by carrying out planting within the area shown in the green edging on Figure 9 (Appendix 6 of consent conditions). Plant the areas shown in the green edging on Figure 9 (Appendix 6 of consent conditions) with species similar to those identified for zone 4a, on the south-eastern side of Ropes Creek, in the Biodiversity Management Plan Erskine Park Employment Area (HLA-Envirosciences, 2 May 2006).	Amended in MOD 5
MOD 5	MOD 5 sought to amend the area within which offsetting is take place due to this area no longer being available for this purpose. In consultation with the Planning Ministerial Corporation a new location has been agreed on and a VMP prepared and submitted with MOD 5 that details the amended location and methods in which the now obsolete Condition D93 will be fulfilled. Conditions D94 and D95 remain unchanged.	Completed compliantly

SSD reference	Consent condition	Status
SSD 7348	 D94. The Applicant shall monitor and maintain the planting for a period of six months to ensure a minimum 85% planting survival rate. D95. The Applicant must notify the Planning Ministerial Corporation at least one month before the completion of planting to enable the Planning Ministerial Corporation to arrange ongoing maintenance. 	
SSD 7348	D96. Prior to construction of Stage 1, the Applicant must implement snake management measures to limit, to the extent practicable, movement of snakes from the Site into the adjacent school and retirement village on the western boundary of the Site. The measures (provision of alternative snake habitat on Site, fencing along the western boundary and installation of snake deterrents) shall be detailed in the CEMP.	Completed compliantly
MOD 7	Minor change to building layouts across Precinct 3 and 4, namely Lot 3B, 3C, and 4E, which results in minor amendments to the estate infrastructure including bulk earthworks in both precincts, the removal of an Estate Road in Precinct 4, and inclusion of additional retaining walls in Precinct 3 & 4	Not applicable - no change to FFMPs conditions
MOD 8	Modifications to approved plans for Warehouses 1A, 1B and 1C	Not applicable - no change to FFMPs conditions
MOD 9	Changes associated with the Modifications to the Concept Plan including the layout of Precinct 2A and the building height of Building 2C to facilitate the Oakdale West Estate Stage 3 Development.	Not applicable - no change to FFMPs conditions

1.3 Subject area

Within the context of the estate, Buildings 2C-2D is located at the southern end of Precinct 2, which is bounded by Estate Road 3 to the west, Lot 2B to the north, the future Southern Link road to the south and east.

Substantial cut and fill earthworks have been undertaken across the wider estate area in compliance with the wider estate's FFMP v7 (écologique, 2020).

Retained native vegetation within the Estate are located outside of the developable precinct areas. The majority of retained native vegetation is protected in Biodiversity Management Areas (BMAs) with additional patches of native vegetation located in easements that will not be developed.

No native vegetation or fauna habitat features have been retained within the Lot 2C-2D (the subject area).

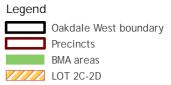
As shown in Figure 1-1 the subject area is not located proximal to any retained vegetation or BMAs.

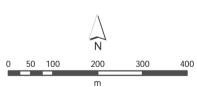
écologique



Oakdale West Estate Buildings 2C-2D

Fig. 1-1. Site Context





2 Existing Environment

2.1 Native vegetation

Four native plant community types (PCTs) occur within the wider Estate, each of which are listed as Threatened Ecological Communities (TECs) under both the NSW *Biodiversity Conservation Act 2016* (BC Act) and Federal *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

These include:

- PCT 835 Cumberland River-flat Forest
- PCT 849 Cumberland Shale Plains Woodland
- PCT 850 Cumberland Shale Hills Woodland
- PCT 1800 Cumberland Swamp Oak Floodplain Forest

All approved clearing of native vegetation under SSD 7348 has been completed. No further clearing of any native vegetation is permitted without first seeking additional approval.

2.2 Wildlife

The former agricultural land use of the Estate and surrounding environs has enabled a range of native fauna to coexist with previous land use practices. The most commonly observed terrestrial fauna species within the Estate are *Macropus giganteus* (the eastern grey kangaroo), a range of reptile species (mainly snakes with lizards less conspicuous) and a range of bird species (including large raptor species).

Aquatic fauna common to the Estate prior to the removal of four farm dams included *Chelodina longicollis* (the eastern long-necked turtle) and both *Anguilla australis* and *Anguilla reinhardtii* (short and long finned eels respectively).

2.2.1 Eastern grey kangaroo

The installation of non-rural fencing and replacement of open pasture with hard stand has resulted in the removal of habitat for a resident population of the eastern grey kangaroo (kangaroo). The provision of the BMA along with peripheral easement areas continue to provide habitat for the kangaroo species albeit substantially reduced in comparison to the pre-development environment.

Development has also considerably altered their accustomed movement patterns. It is likely to take some time before the resident kangaroo population adapt their movement patterns to the changed environment. While kangaroos are more commonly seen around the periphery of the Estate's developed areas, they may still be observed nearer developed and road areas, particularly at dusk at dawn.

2.2.2 Snakes

The most commonly observed snakes across Oakdale West are:

- Pseudechis porphyriacus (red-bellied black snake); and
- Pseudonaja textilis (eastern brown snake).

A tiger snake (*Notechis scutatus*) was reportedly seen on a stockpile during construction but was not accurately identified and potentially a banded form of the eastern brown snake.

The BMA to the west of the subject area contains snake refuge habitat, which was installed in response to concerns raised by the adjacent Emmaus Catholic College (due to a high level of snake sightings in and around the college).

In accordance with the Oakdale West FFMP v7 (écologique, 2020) snake refuge habitat (rock piles and large woody debris) and snake deterrent fencing were installed along the Estate's western boundary.

In addition to the above snake deterrent measures and relevant to Building 2C and 2D is the requirement to install vermin control within each building.

Vermin, such as *Rattus rattus* (the black rat) and *Mus musculus* (house mouse) are common snake prey and minimising the occurrence of these introduced species is anticipated to minimise snake populations.

2.2.3 Aquatic fauna

Four farm dams were decommissioned during the earthworks for the Oakdale West development. Native aquatic fauna were rescued and relocated to various pre-determined locations within Ropes Creek to the east of the Estate.

The majority of relocated fauna comprised long-finned eels, with smaller numbers of short-finned eels and long-necked turtles.

Both eel species are highly territorial and migratory and may attempt to return to the locations of the decommissioned dams. Although the pre-development overland drainage has been modified such that it is highly unlikely to encounter either of these species within the subject area.

Turtles are also capable of overland dispersal and may attempt to return to the location where dams were decommissioned. This is more realistic as one turtle has already been captured and relocated from the developable and under construction area of the Estate.

Until all construction detention basins are decommissioned and Estate wide detention basins are retrofitted to become bioretention basins, there is a potential for migratory aquatic fauna to be encountered within the Estate.

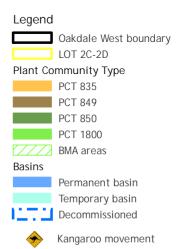
Figure 2-1 shows the areas of previous farm dams and existing fauna habitat with respect to Lot 3B.

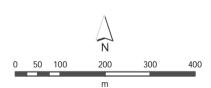
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Oakdale West Estate Buildings 2C-2D

Figure 1-2. FFMP Context





3 Mitigation Measures

While Precinct 2 and the wider Estate have been substantially modified the potential to encounter wildlife must still be considered in accordance with the overarching SSD 7348 - Administrative Conditions that require:

- An obligation to minimise harm to the environment; and
- Compliance with biodiversity management and mitigation measures.

3.1 Potential impacts

3.1.1 Potential direct impacts

Potential direct impacts on native fauna include:

- Vehicle / mobile plant strike resulting in injury or death of terrestrial fauna; and
- Injury or death of fauna that inadvertently become stranded within the construction area.

3.1.2 Potential indirect impacts

Indirect impacts occur when activities relating to the construction or operation of a development affect native vegetation, fauna and fauna habitat beyond the subject site.

Potential indirect impacts relevant to the Buildings 2C-2D works may include the following:

- Transport of weeds into the site and spread into the Estate's landscape areas and BMAs;
- Transport of pathogens/disease into the site and spread into the BMAs;
- Pollution of downstream waterways and aquatic habitat, through accidental spills and leaks;
- Introduction or increase in pest animal populations (such as vermin); and
- Rubbish / litter from the site entering the wider Estate area, through either accident drift or deliberate dumping.

3.2 Mitigation measures

Table 3-1 details mitigation measures that will need to be implemented to ensure consent compliance during construction of Buildings 2C and 2D.

Table 3-1: Flora and fauna management and mitigation measures

ID	Measure/Requirement	Responsibility	Timing		
[WILDL	[WILDLIFE PROTECTION]				
FF1	All personnel including contractors are to be made aware of the possibility of encountering fauna, through the site works induction process.	Management / Contractors	Pre-construction		
FF2	 Vehicle and mobile plant operators shall remain vigilant when entering and exiting the works area, particularly at dusk and dawn. Specifically: Should kangaroos be observed transiting across the entrance/exit to the works area, vehicle/mobile plant is to stop until animals have moved to a safe distance to ensure vehicle/mobile plant strike is prevented. All on site personnel shall alert vehicle/mobile plant entering or existing the works area if kangaroo movement is observed (via UHF radio or mobile phone as applicable) All personnel including contractors are to report any injured or near miss incidents with wildlife. 	Management / Contractors	Ongoing throughout construction		
FF3	Should unexpected fauna be encountered within the works site, the stop works procedure provided in Section 4 must be followed.	Management / Contractors	Ongoing throughout construction		
[AQUATIC ECOSYSTEM PROTECTION]					
FF4	Offsite discharge shall be managed in strict accordance with Erosion & Sediment Control Plans prepared for Lot 2C AND 2D; and	Management / Contractors	Ongoing throughout construction		
FF5	 All vehicles, plant and machinery are to be kept in good condition and regularly maintained to avoid chemical leaks and/or spills. 	Management / Contractors	Ongoing throughout construction		
FF6	 A spill kit should be provided in an easily accessible location in the event that fuel or other contaminant spills occur. 	Management / Contractors	Ongoing throughout construction		

ID	Measure/Requirement	Responsibility	Timing	
[WEED	[WEED, PEST SPECIES AND PATHOGEN MANAGEMENT]			
FF7	 The following hygiene procedures are to be implemented to avoid the introduction and/or spread of soil borne pathogens and weeds: Minimise work during wet/rainy periods; Vehicles, plant and machinery are to be clean and free of soil on arrival to the works area; Truck wash down, rumble grids to be installed and operated to ensure mud, weeds or pathogens are not transported around the region or onto roads; Mud spilt on roads to be immediately removed by a road sweeper. 	Management / Contractors	Ongoing throughout construction	
FF8	Future tenants are to install rodent (electronic or sonar) repellents to minimise prey for snakes	Management / Tenants	Post construction	
[WASTE MANAGEMENT]				
FF9	 Waste management shall ensure the following: All waste placed in skips or bins for disposal or recycling will be adequately contained to ensure that the waste does not fall, blow, wash or otherwise escape from the site; Lids on skips or bins are to be kept closed at all times; and Employ adequate environmental management controls to prevent off-site migration of waste materials and contamination from the waste. For example, consideration of slope, drainage, proximity relative to waterways, stormwater outlets and vegetation 	Management / Contractors / Future tenants	Ongoing throughout construction and operation	

4 Stop Works Procedure

All personnel working on the Project will need to be inducted on the potential to encounter wildlife within the wider Estate area but also within the works area. The stop work procedure in the event any fauna unexpectedly occurs is shown in the following flow diagram.

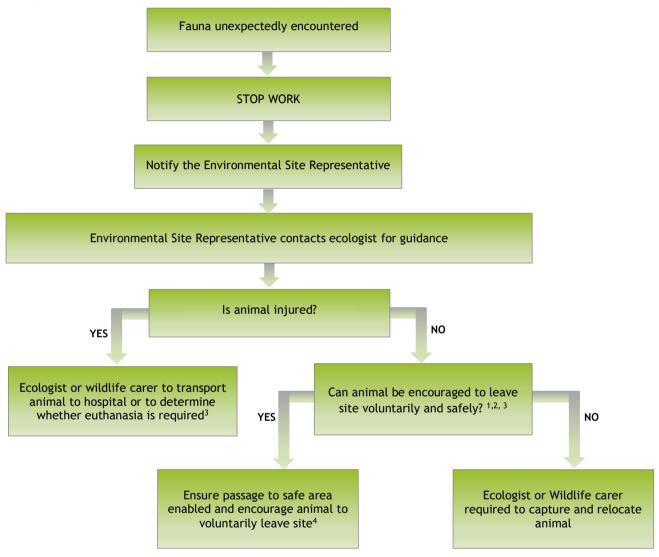


Figure 4-1. Stop work procedure

FOOTNOTES

- ¹ Snakes are to be left alone and not disturbed. A specialist reptile handler should be engaged for capture and relocation if the snake is located within an area that prevents work from continuing.
- ² Nocturnal species (e.g., any small marsupials such as possums) should be left alone until the Project ecologist or wildlife carer is able to capture and relocate animal at dusk.
- ³ Nocturnal and injured animals shall be protected from disturbance (through temporary flagging tape or signage and communication to all personnel that the area is a temporary no go zone). If animal is stranded in direct sunlight some form of shading is to be erected to protect the animal until the Project ecologist or wildlife carer arrives at the site.
- ⁴ Should safe passage be obstructed by fencing or other immovable impedances; Footnote 3 should be implemented.



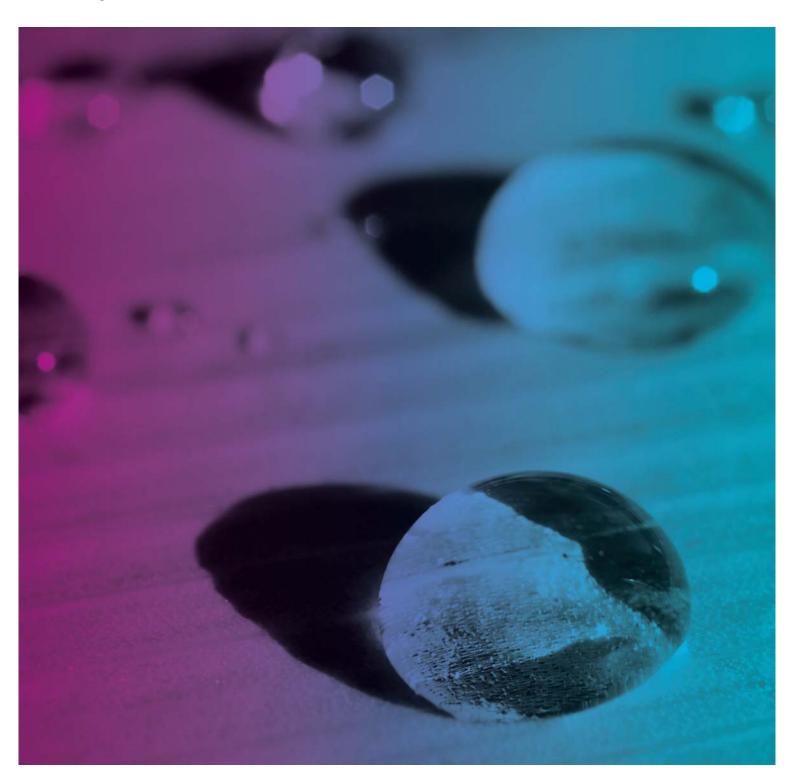
APPENDIX M

Unexpected Finds Protocol – Contamination



Unexpected Finds Protocol

Oakdale West Estate



Unexpected Finds Protocol

Oakdale West Estate

Client: Goodman Property Services (Aust) Pty Ltd

ABN: 40 088 981 793

Prepared by

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Quality Information

Document Unexpected Finds Protocol

Ref 60599325

Date 03-Nov-2022

Prepared by Stephen Randall

Reviewed by Brad Eismen

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1	24-Sep-2019	Final	Alex Latham Associate Director	
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Glossary

Canaral Torms		
General Terms		
ACM	Asbestos Containing Material	
AEC	Area of Environmental Concern	
ASC NEPM	Assessment of Site Contamination National Environment Protection Measure (2013)	
BTEXN	Benzene, toluene, ethylbenzene, xylenes and naphthalene	
CEMP	Construction Environmental Management Plan	
CoPC	Contaminants of Potential Concern	
CSM	Conceptual Site Model	
DQI	Data Quality Indicators	
DQO	Data Quality Objectives	
EIL	Ecological Investigation Level	
EPA	Environment Protection Authority	
ESL	Ecological Screening Level	
FIP	Fill Importation Protocol	
На	Hectare	
HIL	Health Investigation Level	
HSL	Health Screening Level	
LOR	Limit of Reporting	
m	Metre	
m bgs	Metres below ground surface	
mg/kg	milligrams/kilogram	
NATA	National Association of Testing Authorities	
NEPC	National Environment Protection Council	
NEPM	National Environment Protection Measure	
OCP	Organochlorine Pesticides	
OPP	Organophosphorus Pesticides	
PAH	Polycyclic Aromatic Hydrocarbons	
PCB	Polychlorinated Biphenyls	
PID	Photoionisation detector	
QA/QC	Quality Assurance/Quality Control	
RPD	Relative Percent Difference	
TPH / TRH	Total Petroleum Hydrocarbons / Total Recoverable Hydrocarbons	
UFP	Unexpected Finds Protocol	
UST / UPSS	Underground Storage Tank / Underground Petroleum Storage System	
VOC	Volatile Organic Compound	

1

1.0 Introduction

AECOM Australia Pty Ltd (AECOM) was engaged by Goodman Property Services (Aust) Pty Ltd (Goodman) to complete an Unexpected Finds Protocol (UFP) for the earthworks associated with the construction of the Oakdale West Estate (OWE), Kemps Creek, NSW (the Site).

The Site is approximately 154 hectares (Ha) of predominantly agricultural (grazing) land and riparian corridor associated with Ropes Creek. Goodman propose to develop approximately 90 Ha of the Site into a warehouse-style estate and distribution centre, under State Significant Development Application 7348 (SSD 7348).

OWE will include pads for building construction, roads, footpaths, bio-retention basins, wildlife corridor(s) and electricity transmission easements. It is expected that earthworks will include:

- Stripping of geotechnically unsuitable overburden in the developable areas (i.e. grass and surface soils to approximately 0.3 m depth), stockpiling and subsequent re-use in landscaping areas, or blended with other Site won materials and re-used in the earthworks.
- Proof rolling stripped areas.
- Extensive cut to fill and retaining wall construction.

This UFP relates to soil contamination and applies up to the completion of the construction of building pads at OWE.

AECOM has previously completed a Phase I Environmental Site Assessment (2007), targeted Phase II Contamination Assessment (2012), asbestos remediation validation sampling (2017) and assessment of sediment and surface water (2019) at OWE. Site features and sampling locations are shown on **Figure 1** and **Figure 2** in **Appendix A**.

Goodman has commissioned geotechnical investigations and a hazardous building material survey at the Site. Data from these investigations and survey have been reviewed and incorporated into this report.

Goodman has appointed a NSW EPA (land contamination) Auditor, Tom Onus of Ramboll Australia Pty Ltd (the Auditor) to the project. Where unexpected finds are encountered, the Auditor must be notified.

A Fill Importation Protocol (FIP) for OWE has been developed by AECOM. The FIP stipulates the soil and aggregates that will be imported to the Site for construction of the building pads, retaining walls, stormwater and sewer pipe trench backfill etc and the associated (contamination-related) testing requirements.

1.1 Objectives

The objectives of this UFP are to:

- Provide a summary of the expected ground conditions.
- Provide a summary of unexpected finds that may be present, based on historical Site data.
- Provide management and assessment recommendations for any identified unexpected finds encountered during OWE construction earthworks.

1.2 Guidelines

AECOM completed this UFP with reference to the following guidelines:

- National Environment Protection Measure (NEPM), Assessment of Site Contamination (ASC) (National Environment Protection Council [NEPC], 1999 as amended (2013) (the ASC NEPM).
- NSW EPA (2017). Contaminated Land Management: Guidelines for the NSW Site Auditor Scheme (3rd Edition).

- NSW OEH (2011). Guidelines for Consultants Reporting on Contaminated Sites. NSW Government Office of Environment & Heritage (OEH).
- SafeWork NSW (2016a). How to manage and control asbestos in the workplace Code of Practice.
- SafeWork NSW (2016b). How to safely remove asbestos Code of Practice.
- WorkCover (2014). Managing asbestos in or on soil. March.

1.3 SSD Conditions of Consent

The SSD Conditions of Consent were issued to Goodman on 13 September 2019. With respect to soil contamination, these are summarised in the following table:

Table 1 Consent Requirements

Condition Requirement	Section / Comment	
D116. Prior to the commencement of construction of Stage 1, the Applicant must prepare an unexpected finds protocol to ensure that potentially contaminated material is appropriately managed. The procedure must form part of the CEMP in accordance with Condition D119 and must ensure any material identified as contaminated is disposed offsite, with the disposal location and results of testing submitted to the Planning Secretary, prior to its removal from the Site.	This UFP.	
D121 (k). As part of the CEMP required under Condition D119 of this consent, the Applicant must include an Unexpected Contamination Protocol.	This UFP is to be included in the CEMP prepared by SLR Consulting Australia Pty Ltd.	
Management Plan Requirement	Section / Comment	
D118. Management plans required under this consent must be prepared in accordance with relevant guidelines and include:		
a) details of: i. the relevant statutory requirements (including any relevant approval, licence or lease conditions); ii. any relevant limits or performance measures and criteria; and iii. the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, Stage 1 or any management measures;	Section 1.2 and Section 5.0.	
b) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria;	This UFP	
c) a program to monitor and report on the: i. impacts and environmental performance of Stage 1; and ii. effectiveness of the management measures set out pursuant to paragraph (b) above;	Continual monitoring during bulk earthworks. Sections 3.1 to 3.5.	

Condition Requirement	Section / Comment
d) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	This UFP
e) a program to investigate and implement ways to improve the environmental performance of Stage 1 over time;	Completed in CEMP
f) a protocol for managing and reporting any: i. incident and any non-compliance (specifically including any exceedance of the impact assessment criteria and performance criteria); ii. complaint; iii. failure to comply with statutory requirements; and	Completed in CEMP
g) a protocol for periodic review of the plan.	Completed in CEMP

2.0 Background Information

2.1 Site Conditions

The Site comprises undulating grasslands, with a ridge running from northeast to southwest. Three farm dams are located to the west of the ridge and two to the east. A Transgrid electricity easement is present in the eastern portion of the Site. Other Site features include:

- Residential house.
- In-ground water holding tank (previously referred to as "old well").
- Unpaved internal access roads.
- Concrete slab, likely a former building.
- Concrete blocks in a drainage line, assumed to represent an erosion control mechanism.
- Pumping point. A small concrete slab that previously housed a pump. Based on anecdotal
 information obtained from the Brickworks Site caretaker, it is understood that the pump point was
 connected directly to the water supply pipeline.
- Two pipes (polyethylene and steel, both approximately 50 mm diameter) at the eastern end of the
 eastern most dam. The Brickworks Site caretaker was aware of the pipes but had no knowledge
 of any pump station or plinth for the pipes.

Ropes Creek is mostly located off-site to the east however, parts of the creek and the riparian corridor are located on the Site but are not subject to future development.

2.2 Surrounding Land Use

Land uses surrounding the Site include:

- North: water supply pipelines followed by commercial/industrial premises and undeveloped agricultural land (the Fitzpatrick Land).
- East: Oakdale South and Central Estates.
- South: rural/residential properties.
- West: schools and retirement village.

2.3 Phase I ESA 2007

The Phase I ESA included the proposed Oakdale development, representing approximately 420 Ha. OWE is situated within the Phase I ESA study area. Site history and background data for OWE is summarised below:

- The Site comprised rural (pastoral lands) since the early to mid 1800s.
- Site soils were expected to comprise clay of the Blacktown and/or Luddenham Soil Landscape Groups and fluvial soils of the South Creek Soil Landscape Group (near Ropes Creek), overlying Shale bedrock.
- Regional groundwater was likely to occur within sedimentary rock at depths greater than 20
 metres below ground surface (m bgs) although seasonal, shallow perched groundwater may exist
 at the soil-bedrock interface and shallow groundwater would likely be present in fluvial soils along
 drainage lines.
- Surface application of "envirosoil" (recycled sewage waste) had occurred to approximately 80 mm depth in the north eastern portion of the OWE (refer **Appendix A**).
- A rubbish scrape and disposal area was identified in a gulley in the south west portion of the Site.
- Deposits of concrete blocks were identified in the drainage line down-stream of the rubbish disposal area, likely placed for erosion control (refer **Appendix A**).

- A concrete slab (probable floor of former building/shed) was identified in the western portion of the Site (refer **Appendix A**).
- An old wooden building (the Old Farmhouse) was present in the south west portion of the Site.
 Adjacent to the building were fragments of asbestos containing material (ACM), likely associated
 with an outhouse building. The Old Farmhouse building has subsequently been removed from
 Site.
- A residential house was located on the ridge line above the Old Farmhouse. The house was
 occupied at the time of the Phase I. The house was of brick construction with a tiled roof.
- Approximately two small buildings were formerly present to the north east of the residential house, adjacent and on the south side of the ridge-line access road (refer **Appendix A**).
- An in-ground concrete lined water tank was present in the south west portion of the Site. The tank contained minor quantities of waste material (e.g. steel, wire, tyres).
- A former piggery was identified in the southern central portion of the Site (refer **Appendix A**).
 Brick and steel waste was scattered over the ground surface.
- Some spot applications of phenoxyacetic acid herbicides (e.g. to control blackberry and other woody weeds) has been historically undertaken, on an 'as needs basis'.
- No burial pits for animal carcasses or cattle/sheep dips were known to be present.

2.4 Targeted Phase II Assessment 2012

AECOM completed a targeted assessment at OWE based on the results of the Phase I ESA. The Phase I ESA identified a low potential for the presence of soil contamination across the majority of OWE however, six areas of environmental concern (AEC) were identified. The six AEC were investigated in the targeted Phase II Assessment, as summarised below:

Table 2 AEC and Targeted Assessment

AEC	Investigation	Results
In ground water tank	2 test pits adjacent to tank (TP1 and TP2)	No contamination identified
Former piggery	15 test pits across former piggery (TP3 to TP17)	No contamination identified
Rubbish burial and scrape	6 test pits (TP18 to TP23)	No chemical contamination identified. Fragments of ACM and asbestos fibres identified in rubbish burial area.
Former buildings area	5 test pits (TP24 to TP28)	No contamination identified
Envirosoil application area	9 test pits (TP29 to TP37)	No contamination identified
Old Farmhouse	3 test pits, 3 surface samples (TP38 to TP40 and SS01 to SS03)	No chemical contamination identified. Fragments of ACM identified.

The sample location plan from the targeted Phase II assessment is included in **Appendix A**. Other information from the targeted Phase II assessment and relevant to this UFP included:

- Test pits were excavated to at least 0.5 m into natural soils. These were logged to comprise dark brown sandy clayey silt topsoil overlying orange to grey clays. Sandstone and shale bedrock was encountered.
- Fill materials were logged at six locations and in each instance, appeared to comprise re-worked natural soils.
- Groundwater was not observed in the test pits completed.

- No unusual odours or colouration in soil were observed at the test pits completed.
- Soil samples were collected from each test pit and samples submitted for laboratory analysis to evaluate concentrations of the inferred contaminants of potential concern (CoPC), which included:
 - Suite of eight metals, including arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc (M8).
 - Benzene, toluene, ethylbenzene, xylenes (BTEX).
 - Total Recoverable Hydrocarbons (TRH).
 - Polycyclic aromatic hydrocarbons (PAH).
 - Organochlorine and organophosphorus pesticides (OCP, OPP).
 - Polychlorinated biphenyls (PCB).
 - Asbestos.
- Waste materials (general rubbish, metal waste) and ACM were identified in the rubbish burial area. ACM was identified in the vicinity of the Old Farmhouse. Remediation of both areas was recommended.
- Concentrations of the chemical CoPC investigated at all test pits were below the ASC NEPM health investigation level (HIL) and health screening levels (HSL) applicable for commercial/industrial land use (HIL D and HSL D).

Groundwater was not investigated. Based on the Phase II data, the potential for groundwater contamination to be present is considered to be low.

2.5 Remediation Report 2017

AECOM was retained by The Austral Brick Company Pty Ltd (Austral) to provide remediation validation services for two AEC identified in the targeted Phase II assessment. The areas were the Old Farmhouse and the Rubbish Disposal Area.

In summary:

- Excavation activities were completed by the Austral appointed earthworks contractor, as well as disposal of rubbish materials and ACM impacted soils.
- The Old Farmhouse excavation footprint was approximately 650 m² and the Rubbish Disposal area excavation footprint was approximately 2800 m².
- Soils at the base of the excavations comprised natural, orange-brown clay.
- No obviously visible fragments of ACM were observed by AECOM at the final excavation surfaces.
- Laboratory analysis results for the validation samples collected from the final excavation surfaces did not identify asbestos at concentrations exceeding the ASC NEPM HSL D in the samples analysed.
- Concentrations of the non-asbestos CoPC investigated were below ASC NEPM HIL D and HSL D.

The sample location plan from the Remediation Report is included in **Appendix A**.

2.6 Surface Water & Sediment Report 2019

AECOM was engaged by Goodman to undertake surface water and sediment sampling at the Site, to assess:

- The suitability of dam sediments for use in bulk earthworks (i.e. re-use at the Site).
- The suitability of dam water for use in bulk earthworks.

The suitability of dam water for discharge to Ropes Creek.

Nine sediment samples were collected from the Dams, seven surface water samples were collected from the Dams and three surface water samples were collected from Ropes Creek. Samples were analysed by laboratories utilising NATA certified methods, to evaluate concentrations of contaminants of potential concern.

Sediment samples were logged to comprise clay, clayey silt and silty clay. Some shale gravel was present. Concentrations of the CoPC investigated were below the ASC NEPM HSL D and HIL D.

Water in the dams was noted to be low to medium turbidity, with aquatic vegetation present. No obvious indicators of contamination were observed. Concentrations of the CoPC investigated were below the adopted assessment criteria in the surface water samples analysed.

Based on the available data, AECOM considered that:

- Sediment in the Dams would be suitable for re-use at the Site.
- Water in the Dams would be suitable for use in the bulk earthworks.
- Water in the Dams appear suitable for discharge to Ropes Creek. This may require evaluation by the Goodman-appointed ecological consultant.

2.7 Hazmat Assessment 2019

EP Risk completed a destructive hazardous materials (Hazmat) assessment of the residential house in 2019. Data from the EP Risk report indicated:

- The house had a footprint of approximately 160 m² and was constructed circa 1960. The house will be demolished as part of the OWE development works.
- Lead based paints were not identified.
- Asbestos was identified in:
 - Fuses within the electrical box (Class A friable)
 - Backing board within the electrical box, eaves, internal wall panels and vinyl floor tiles (Class B non-friable).
- Asbestos removal works will be required to be undertaken by appropriately licensed contractors under controlled conditions.
- An in-ground septic tank (concrete construction) was present on the western side of the house.

Goodman has advised that the head earthworks contractor will undertake the demolition (via a sub-contractor). AECOM has requested the following information for 'validation' reporting:

- Copies of asbestos licenses.
- Copies of all landfill disposal documents for asbestos containing materials.
- Air monitoring results (taken during asbestos removal works).
- Hygienist clearance inspection reports.
- Soil sample analysis data. It is expected that:
 - Surface soil samples will be collected from the building footprint and analysed for asbestos, OCP, OPP and M8.
 - Soil samples will be collected from a small excavation formed by the removal of the septic tank and pipe run and analysed for asbestos, OCP, OPP, M8, TRH and BTEXN.
 - Soil samples will be collected from excavated materials (i.e. from pipe run and around septic tank) and analysed for asbestos, OCP, OPP, M8, TRH and BTEXN.

2.8 Geotechnical Investigations

Goodman commissioned Pells Sullivan Meynink (PSM) to undertake geotechnical assessments of the Site. These are summarised below. Sample location plans are included in **Appendix A**.

PSM 2015a

The PSM investigation was based on the proposed cut to fill earthworks. PSM inferred fill depth up to approximately 12 m and cut depth up to approximately 15 m. Fieldworks were completed in October 2015 and included:

- 13 boreholes (BH01 to BH13) completed by a 14 tonne (t) excavator with a pendulum auger attachment. These locations were completed to depths between 1.5 and 4.95 m, predominantly in 'cut' areas.
- 2 boreholes (BH14 and BH15) were completed by drill rig to approximately 15 m depth. The boreholes were completed by auger then coring.
- 27 test pits (TP01 to TP27) were completed by a 12 t excavator to a maximum depth of 2 m.

PSM noted that the Site comprised grassy paddocks separated by steel wire fencing and several dams.

In summary, PSM logged the conditions as:

- Topsoil (0 to 0.04 m): low plasticity, soft to stiff, dark brown clay with rootlets.
- Natural Soil (0.04 to 0.7 m): medium to high plasticity, stiff to very stiff, light brown to grey clay.
- Bedrock (0.7 to 4 m): extremely to moderately weathered, light brown to grey, shale and sandstone.
- No groundwater was encountered.
- No anthropogenic inclusions or fill materials were noted on the logs.

PSM 2015b (soil salinity and aggressivity)

The fieldwork was undertaken concurrently with 2015a. Samples were collected from the geotechnical investigation locations and called E1 to E25. PSM noted that the Site was covered in grass and trees and that no indications of salinity were observed (e.g. salt crystals, bare soil patches, salt pans, dieback of trees, gully erosion etc.).

The PSM data indicated:

- The majority of soils on-Site are classified as non-saline, with some soils classified as slightly saline.
- The risk of acid sulfate soils to be present was considered to be low.
- Soils ranged from non-sodic to highly sodic (the measure of the likely dispersion on wetting and to shrink-swell properties).

PSM 2018a

Six boreholes were drilled in or within close proximity to the water pipeline easement. Logged conditions were:

- Northern side of pipeline easement: approximately 2.5 m of grey-red-brown sandy clay (reworked natural, or easement spoil), overlying orange-red-brown clay, grading to shale bedrock at approximately 4 to 4.5 m bgs.
- Pipeline Easement: asphalt access road with roadbase sub-grade overlying grey-red-yellowbrown sandy clay, grading to shale bedrock at approximately 3 to 3.8 m bgs.
- Southern side of pipeline easement: red-grey-brown clay to approximately 8 m bgs, overlying shale bedrock.

PSM 2018b

The investigation targeted the location of the proposed sewer infrastructure. PSM understood that approximately 3.8 km of sewer main (with 56 manholes) would be constructed, between 1.2 and 15.8 m below existing ground level.

The investigation included:

- Boreholes BH01 to BH47 were drilled by track and truck mounted drill rigs. Primary boreholes
 were drilled at proposed manhole locations or at intermediate locations where the distance
 between manholes exceeded 120 m. Secondary boreholes were drilled where the distance
 between manholes was less than 50 m. Some boreholes were not completed or were moved, due
 to:
 - Proposed manhole/sewer was above the existing ground surface (within future fill)
 - Presence of services (BH01 moved)
 - Presence of ponds (BH16 and BH17).
- Boreholes were completed to depths between 6 and 15 m.
- Logged conditions were consistent with PSM 2015a. No anthropogenic inclusions or fill materials were noted to be present.
- Groundwater was observed at 11 locations, as wet material on the auger rods, between 3.5 and 13.5 m. Shallow groundwater (i.e. at approximately 3.5 to 5 m) was present in proximity to Ropes Creek.

2.9 Site Inspections

The inspection undertaken on 5 December 2018 was targeted to the rubbish disposal excavation, Old Farmhouse excavation, two small dams and concrete slab in the western portion of the Site, former piggery and traverses of the paddock between the residential house and main northern farm dam (by car).

In summary:

- Conditions were similar to those previously observed.
- The residential house was present but not occupied.
- Remedial excavations were still identifiable.
- The Old Farmhouse was not present.
- The traverses were undertaken to assess for a possible old water pump location. This was not identified. It is noted that long grass negated a detailed inspection of the ground surface.

Inspection was undertaken during the sediment and surface water sampling in March 2019, which primarily focused on the five dams and the pump point. In summary:

- Vegetation (grass and trees) appeared healthy.
- Inspection observations relating to the dams and Ropes Creek are provided in AECOM 2019.
- Two pipes were noted at the eastern end of Dam 5. No obviously visible buildings/sheds/concrete plinths etc associated with the pipes were observed.
- The pumping point was identified. The pump was not present. No obvious indications of contamination were observed.
- No areas of bulk excavation or stockpiling were observed, consistent with previous inspections.

3.0 Unexpected Finds

3.1 Roles and Responsibilities

Roles and responsibilities for the Site works are expected to include:

Table 3 Roles & Responsibilities

Company	Role / Responsibility
Goodman	Owner / Development Manager
AT&L	Project Manager / Superintendent
Burton	Earthworks Contractor
AECOM	Contamination Consultant
Ramboll	Auditor (contamination)

In the event that unexpected finds are encountered:

- The Earthworks Contractor will immediately inform the Superintendent.
- The Superintendent will inform Goodman, AECOM and notify Penrith City Council (PCC)
- AECOM will inspect the unexpected find (if required) and inform the Auditor.

In the event that any identified unexpected find requires remediation, the following is noted:

- SEPP (Resilience and Hazards) Chapter 4 Remediation of Land applies, i.e. consent is required as all remediation works within the Penrith LGA is category 1 works.
- A Remedial Action Plan (RAP) should be prepared by the Contamination Consultant and be
 approved by the Auditor prior to undertaking the remediation works. The RAP will be prepared
 with reference to applicable NSW EPA approved guideline documents. The RAP will include
 disposal locations and results of testing of materials identified as contaminated and is to be
 submitted to the Planning Secretary, prior to removal from Site.
- Following any remediation work, a validation report will be prepared, confirming that all requirements of the RAP have been met, including documentary evidence confirming off-Site disposal of contaminated soils (refer **Section 5.0** of this document).
- The validation report will be available to the Planning Secretary of the Department of Planning upon request.

3.2 Areas with Perceived Higher Risk

The presence of unexpected finds cannot be discounted at the Site however, the following areas are considered to pose a higher risk of the presence of ACM:

- Former piggery.
- Two former small buildings to the north east of the residential building.
- Concrete slab in western portion of Site.
- Area of deposited concrete blocks in the gulley / creek line.

These are shown in figures provided in **Appendix A**.

3.3 Asbestos Containing Materials

In the event that fragments of ACM are identified during the earthworks, works will cease in that area and AECOM, Goodman and/or the Site Superintendent will be contacted immediately and the Auditor will be notified. An exclusion zone will be established around the ACM and an appropriate

occupational health and safety (OHS) protocol for entry into the exclusion zone will be implemented. The Earthworks Contractor (EC) should collect fragments and store in an appropriate location (e.g. plastic lined skip bin). The ACM will be disposed to an appropriately licensed landfill facility. This disposal process will be tracked via the Material Tracking Plan (refer to **Section 4.0**) and the landfill documentation included in the Validation Report. All work must be conducted in accordance with SafeWork NSW (formerly WorkCover) policy and licensing requirements.

If large quantities of ACM are identified, excavation and stockpiling is recommended. Excavation should continue until there is no visible ACM. Stockpiles should be kept moist and covered until disposed off-Site.

Validation sampling of the stockpiles to assess suitability for potential re-use is not recommended.

Areas that are excavated will require validation sampling, to confirm removal of the ACM. Validation sampling should be done with reference to the Western Australian Department of Health (DoH) Guidelines for the Assessment, Remediation and Management of Asbestos Contaminated Sites in Western Australia (May 2009) and ASC NEPM 2013.

With reference to WorkCover NSW (2014) *Managing Asbestos in or on Soil* and Safework NSW (2016b) *How to Safely Remove Asbestos*, implementation of the following management measures are recommended if asbestos is identified:

- Less than 10 m² of bonded asbestos (e.g. fragments of fibro in good condition):
 - Handpick the fragments and double wrap in plastic sheeting. Inspection/handpicking should be completed on a grid basis for a systematic approach
 - Appropriate personnel protective equipment should be worn
 - Appropriately trained personnel should be utilised
 - The area should be inspected by an appropriately qualified hygienist to confirm removal of the asbestos fragments
 - A Licensed asbestos removal contractor (Class A or B) should not be required
 - Air monitoring for asbestos fibres should not be required.
- More than 10 m² of bonded asbestos:
 - A Class B licensed asbestos removal contractor will be required to collect and dispose of the materials
 - Handpick the fragments and double wrap in plastic sheeting. Inspection/handpicking should be completed on a grid basis for a systematic approach
 - Appropriate personnel protective equipment should be worn
 - Appropriately trained personnel should be utilised
 - Air monitoring for asbestos fibres may not be required but should be considered if there are reasonable grounds to expect that exposure standards have been or could be exceeded
 - The area should be inspected by an appropriately qualified hygienist to confirm removal of the asbestos fragments.
- Friable asbestos is identified:
 - Isolate and secure the area by installing warning signs and barriers
 - Keep the soil damp but not flooded and if safe, cover the area with plastic sheeting
 - Class A licensed asbestos removal contractors will be required
 - Air monitoring will be required
 - The area should be inspected by an appropriately qualified hygienist to confirm removal of the asbestos
 - Friable asbestos must be stored in sealed containers

Asbestos waste must be transported in a covered, leak proof vehicle.

3.4 Burial Pits

In the event that burial pits relating to the former grazing activities are exposed, works will cease in that area and AECOM, Goodman and/or the Site Superintendent will be contacted immediately and the Auditor will be notified. An exclusion zone will be established around the burial pit and an appropriate occupational health and safety (OHS) protocol for entry into the exclusion zone will be implemented. All carcass' and impacted soils will be removed appropriately and disposed off-Site at a registered facility. Soils remaining in the burial pit will be validated for total phosphorus (TP), filterable reactive phosphorus (FRP), total nitrogen (TN), nitrate (NO3), nitrite (NO2), total Kjeldahl nitrogen (TKN) and ammonia (NH4+). Investigation for other CoPC may be required (e.g. hydrocarbons, asbestos, M8 etc), depending on the buried materials encountered.

3.5 Other Unexpected Finds

If materials are encountered during the earthworks which are significantly different to those described herein (including the identification of drums or underground storage tanks, etc.), works will cease in that area and AECOM, Goodman and the Site Superintendent will be contacted immediately and the Auditor will be notified. An exclusion zone will be established around the unexpected find area and an appropriate OHS protocol for entry into the exclusion zone will be implemented. AECOM will inspect the unexpected find and assess if it is the source or has the potential to contaminate the surrounding area. In the case that there is potential for contamination or it has occurred, all materials and impacted soil will be removed appropriately and disposed off-Site at a registered facility. Remaining soils will be validated for CoPC (refer **Section 2.4**) and any additional analytes specific to the unexpected find.

4.0 Materials Tracking Plan

A Materials Tracking Plan (MTP) will be developed and implemented by the Earthworks Contractor (EC). All materials handled during the earthworks will be tracked in order to allow verification of the correct movement and handling. The system will track materials from 'cradle-to-grave' and will provide information on the location and quantity of all material movements both on and off-Site, so that the material being handled can be identified and accounted for.

The MTP will include confirmation of stockpile locations and contamination status by regular communication between AECOM, the EC appointed environmental consultant (as applicable), the EC and the Site Superintendent. Where necessary, stockpiles and/or pit locations will be recorded by surveying, to reduce the risk of cross-contamination between stockpiles.

As part of the MTP, records shall be kept to ensure that backfilling of excavations and beneficial reuse of material only occurs following the successful validation of the subject materials.

The EC must implement a MTP, to appropriately control and manage the excavation of material at the Site. The purpose of the MTP is to ensure that material movements are controlled at all times and placed in their correct locations.

The MTP should be based on the proformas provided in **Appendix B**, as summarised below:

- <u>Material Excavation Form:</u> a record of excavated materials on the Site which includes the date, material type/description, excavated quantity, origin and intended destination.
- <u>Stockpile Register</u>: a record of all materials placed in stockpiles which includes the date, material type/description, stockpiled quantity, origin and intended end use (which will be "for characterisation", "for backfilling" or "for off-Site disposal"). Material excavated and stockpiled will be identified with a marker flag or stake clearly labelled with the stockpile source information and a stockpile ID.
- <u>Material Placement Form:</u> a record of all materials backfilled on the Property which includes the date, material type, quantity backfilled and origin.

Any soil and other waste materials that require off-Site disposal, must be classified in accordance with the NSW EPA (2014) *Waste Classification Guidelines*.

5.0 Validation Reporting

At the completion of the earthworks, AECOM will prepare a Validation Report (or reports) in accordance with the requirements of the NSW OEH (2011) *Guidelines for Consultants Reporting on Contaminated Sites* and NSW EPA (2017) *Guidelines for the NSW Site Auditor Scheme* (3rd Edition). The Validation Report(s) will include the following information:

- An overview of the earthworks carried out.
- Survey plans outlining the extent and elevations of the earthworks.
- The location of validation samples (if validation sampling is required).
- Descriptions of sampled materials (including visual and olfactory observations, if required).
- Summary tables for soil analytical results.
- NATA registered laboratory analytical certificates.
- Summary of the tracking and fate of all excavated materials (detailed in a Stockpile Register).
- Demonstration that the MTP has been implemented appropriately including copies of the EC's documentation.
- Landfill weighbridge dockets (if required).
- A summary of data reviewed and collected under the FIP.
- Conclusion as to the suitability of the Site for the proposed land use.

6.0 References

AECOM. 2007. Phase I Environmental Site Assessment, Oakdale Concept Plan, Kemps Creek/Horsley Park, NSW. 13 December 2007 (ref: S4074201_RPTFinalRev02_13Dec07).

AECOM. 2012. Oakdale Western Precinct, Targeted Phase II Contamination Assessment. 27 July 2012 (ref: 60268528-RPE-20120727_0).

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AECOM. 2019a. Oakdale West Estate, Surface Water & Sediment Sampling. 11 April 2019 (ref: 60599325_RPT_20190411_0).

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EP Risk. 2019. Destructive Hazardous Materials ('HAZMAT') Assessment, Oakdale West Estate, Bakers lane, Kemps Creek NSW 2178. February.

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PSM. 2015a. *Oakdale West Estate, Kemps Creek, Geotechnical Investigation*. November 2015 (ref: PSM1541-123R).

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PSM. 2018b. Oakdale West Estate, Proposed Sewer Alignment, Geotechnical and Salinity Investigation. October 2018 (ref: PSM1541-370L).

SafeWork NSW. 2016a. Code of Practice: How to Manage and Control Asbestos in the Workplace.

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WA DOH. 2009. Guidelines for the Assessment, Remediation and Management of Asbestos-Contaminated Sites in Western Australia. May 2009.

WorkCover NSW. 2014. Managing asbestos in or on soil. March.

Appendix A

Figures



AECOM Imagine it. Delivered.

TARGETED PHASE II SAMPLE LOCATIONS

Unexpected Finds Protocol



AECOM Imagine it. Delivered.

VALIDATION SAMPLE LOCATIONS

Unexpected Finds Protocol

Oakdale West Estate, New South Wales

G:\Jobs\S4\S40700_S40799\S40742\S404201 F2.cdr 13 12 2007 TO www.hlaensr.aecom.com



1	Former building
2	Residence
3	Old farmhouse
4	Former buildings
5	Waste materials
6	Well
7	Rubbish scrape
8	Former (possible) piggery
9	Soil stockpiles
10	Dam with concrete blocks
11	Well
12	Settlement ponds
13	Cattle yards
Α	Visual bunds





Approximate site boundary
Approximate areas of enviro-soil
application

12

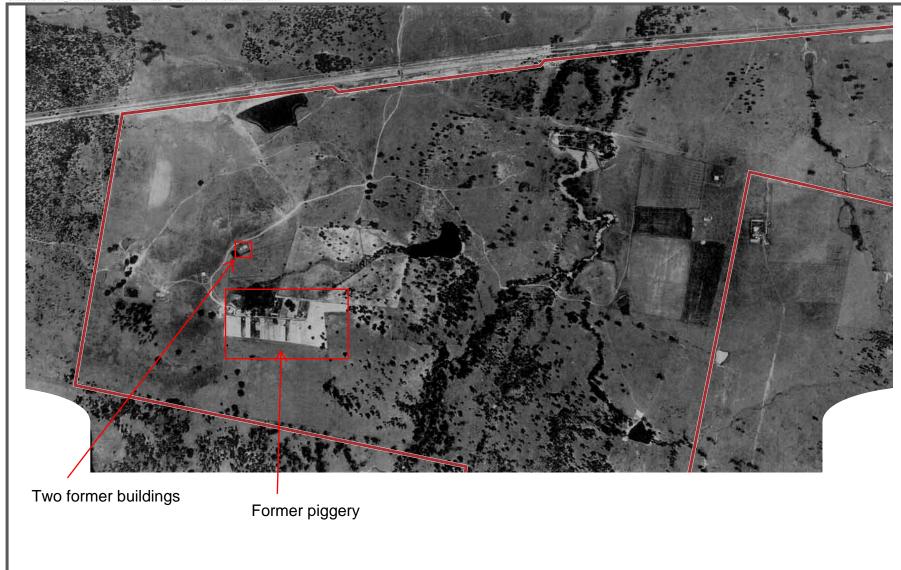
Plate number and direction of view



Phase I Environmental Site Assessment
Oakdake Concept Plan



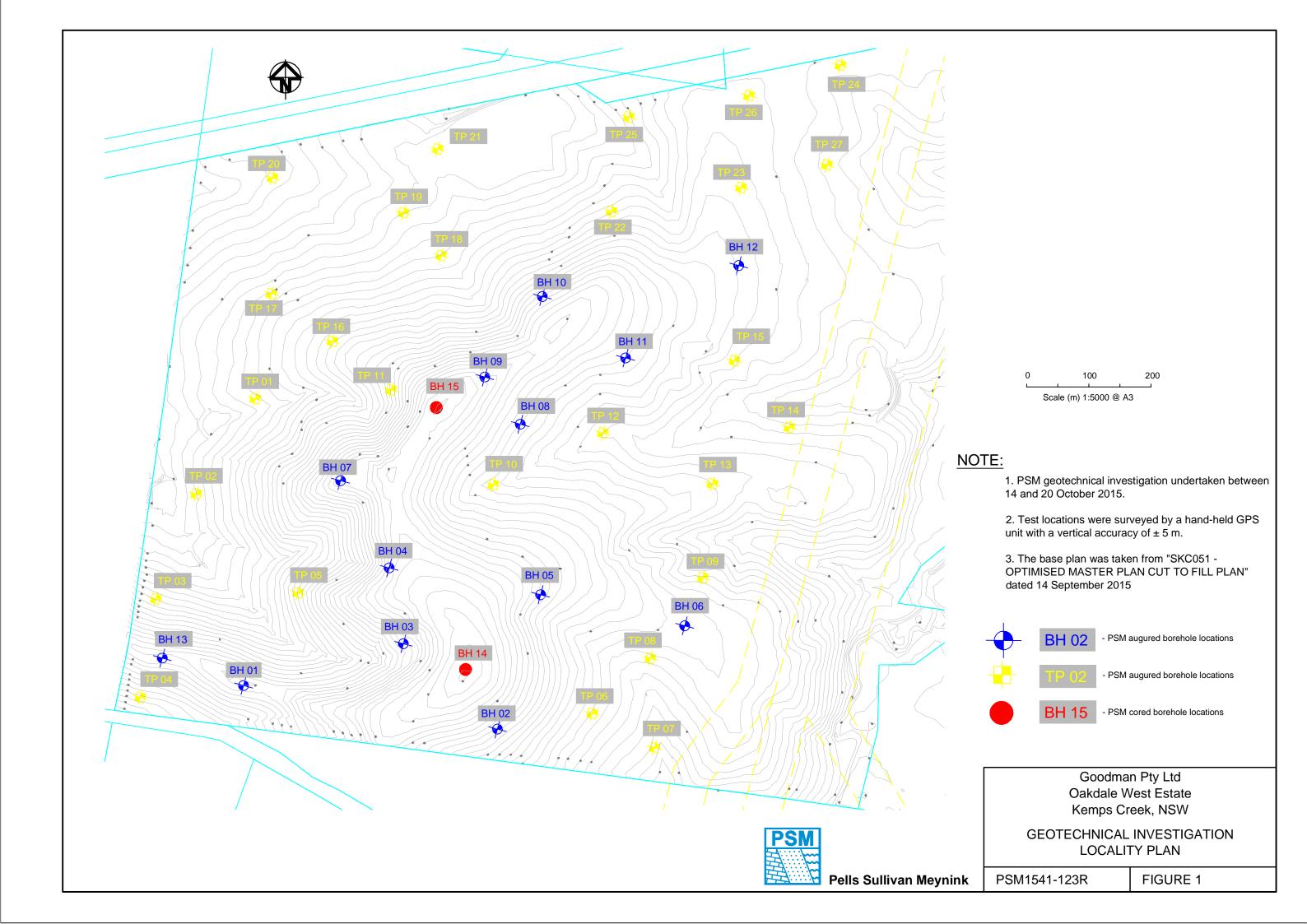
Concrete blocks downstream of former rubbish disposal area.

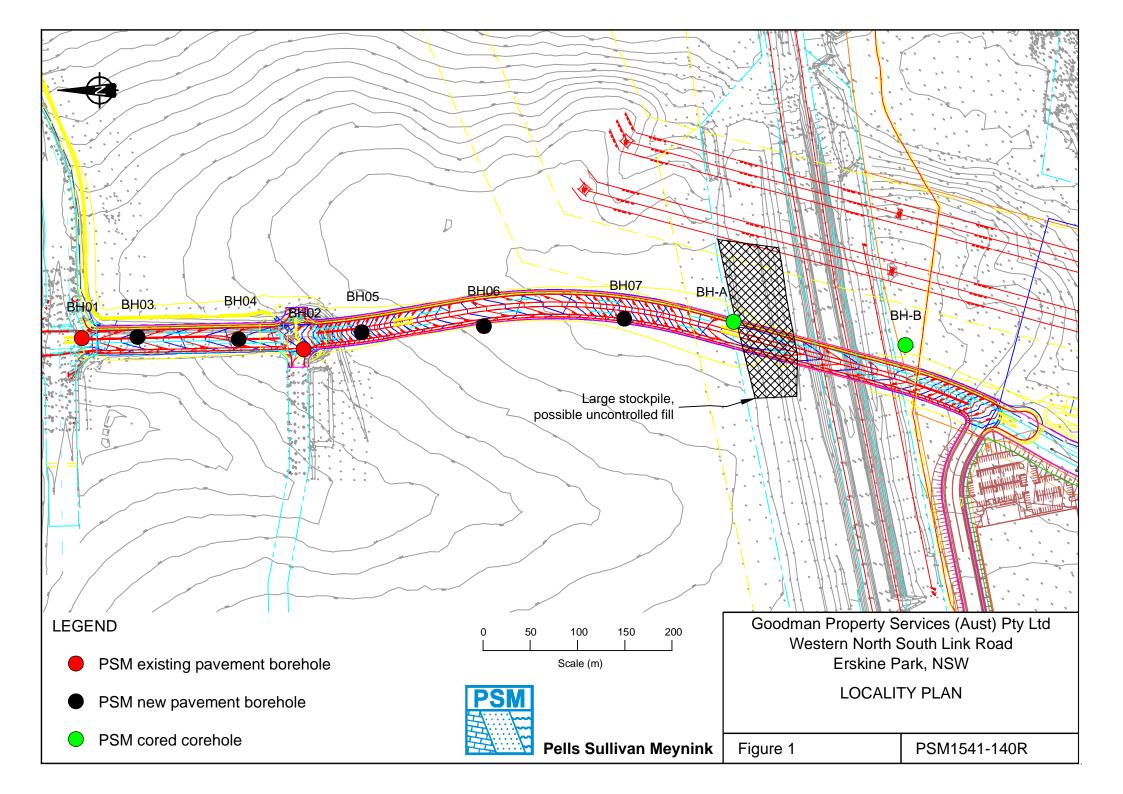


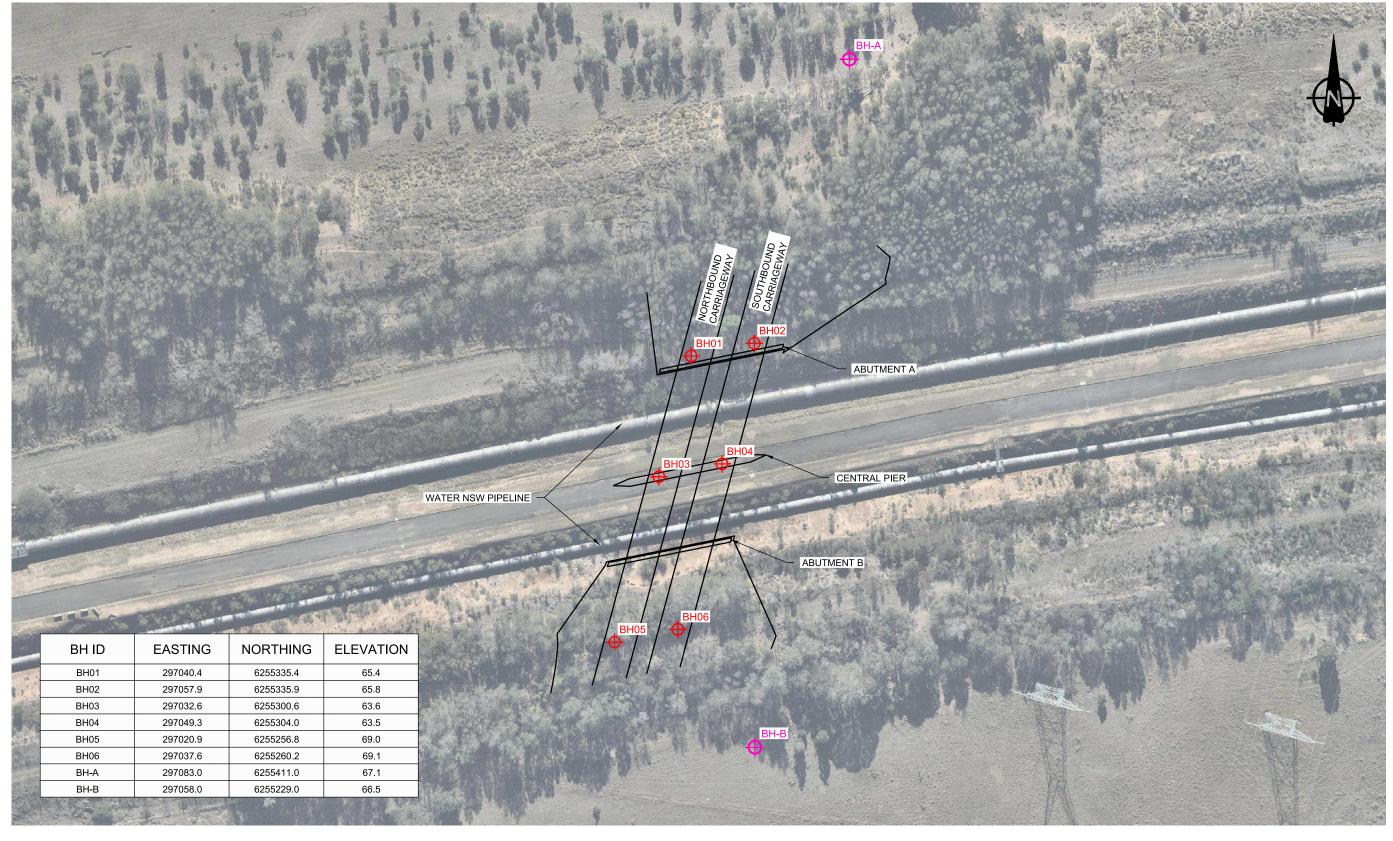




Phase I Environmental Site Assessment
Oakdake Concept Plan







NOTES:

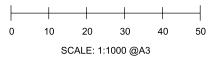
- BRIDGE LAYOUT FROM AT&L DRAWING "WNSLR BOREHOLE TESTING LOCATIONS FOR BRIDGE PIERS PLAN" BOREHOLE ELEVATIONS ESTIMATED FROM CONTOURS ON AT&L DRAWING (SKC121) NEARMAP IMAGERY DATED 22 JUNE 2018



PSM BH LOCATIONS (CURRENT INVESTIGATION)



PREVIOUS PSM BH LOCATIONS (REFER PSM1541-140R)

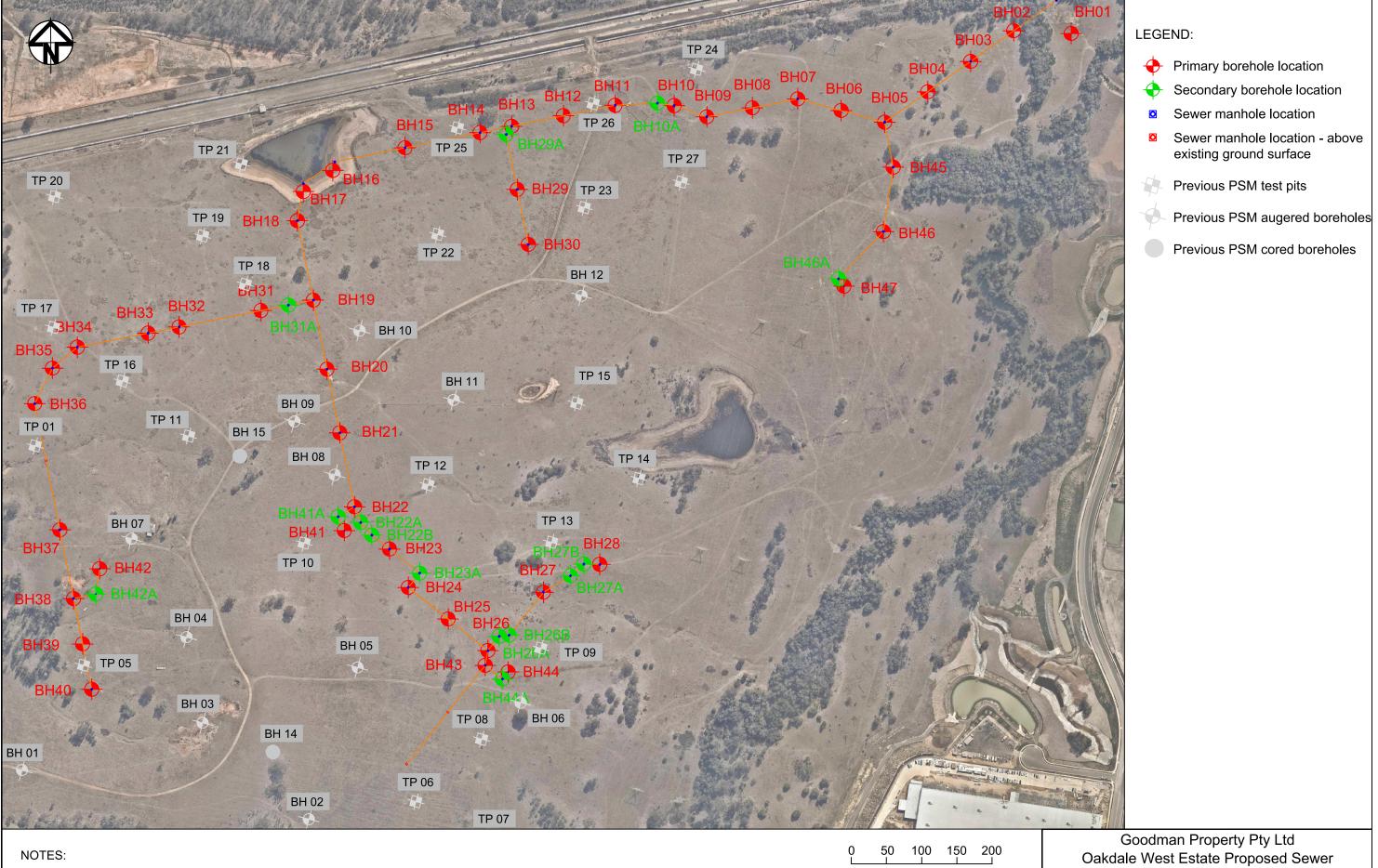




AT&L WESTERN NORTH-SOUTH LINK ROAD EASTERN CREEK **BOREHOLE LOCALITY PLAN**

Pells Sullivan Meynink

PSM1541-367R FIGURE 1



Primary boreholes are located at sewer manholes or at interim locations where manhole distance is greater than 120 m.

- Secondary boreholes are located between manholes where distance is less than 50 m.
- No boreholes were drilled at manhole locations where sewer level will be above existing ground surface (manholes 3-7, 6-2 and 6-3).
- 4. For details of previous PSM investigation, refer to PSM1541-123R.

Scale (m)

Pells Sullivan Meynink



Kemps Creek, NSW

LOCALITY PLAN

PSM1541-370L

Figure 1

Appendix B

Materials Tracking Register (proformas)

MATERIALS EXCAVATION FORM

DAT	E	 	

Material Type	Material Description	Source Location	Volume m³	Intended Destination

Make notes on: Where and when the material is excavated, how long and where it is stockpiled. Take photos and sketch.

Stockpile Materials Tracking System Form

Location of Stockpile (tick one below)	
Within bunded work area, designated area (stockpile g number)	rid number or excavation
	·
The stockpile status/classification: (tick one below)	
Import	
Closed – quarantined	
Export	
The material type:	
The origin (excavation or another stockpile) of material	in the stockpile:
The stockpile volume:	
The destination (including intended end use) of materia	ıl in the stockpile:
For characterization	
Backfill	
Another stockpile (describe)	
Off-site landfill	

Validation samples collected from the stockpile (as appropriate).

MATERIALS PLACEMENT FORM

Material type	Backfill quantity	Source location	Validated

MATERIALS OFF-SITE TRANSFER FORM

Source Location/ Stockpile No.	Material Description	Volume (m³) or Tons	Waste Classification received (date)	Landfill Disposal Dockets

APPENDIX N

Unexpected Finds Protocol – Archaeological



Unexpected Finds Protocol – Archaeological Items

•	Date: Wednesday, 13 November 2019
	Author: Sandra Wallace (Senior Heritage Consultant)

Project Background

On 13 September 2019 consent for the proposed Stage 1 works was granted by the Secretary of the NSW Department of Planning and Environment. The development consent is for a State Significance Development (SSD), reference number is 15_7348, referred to as SSD 15_7348.

Artefact Heritage has prepared this Unexpected Finds Protocol (UFP) to satisfy the conditions of approval for the project, as below:

Table 1: Table of conditions

Archaeology				
Condition No.		Condition	Action	
	(a)	All work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately;		
D106. If any item or object of Aboriginal heritage significance is identified on Site:	(b)	A 10 m wide buffer area around the suspected item of object must be cordoned off; and	Refer to Unexpected Finds Protocol	
	(c)	The Biodiversity and Conservation Division of the Department must be contacted immediately.	_	
D107. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.			Refer to the Office of Environment and Heritage 2011 Guide to Investigating, assessing and reporting on Aboriginal cultural heritage in NSW: Part 6 National Parks and Wildlife Act 1974	

D108. If any archaeological relics are uncovered during construction of Stage 1, then all works in the immediate vicinity of the relic must cease immediately. Unexpected finds must be evaluated and recorded in accordance the requirements of Department of Premier and Cabinet, Heritage (former NSW OEH Heritage Division).

The significance of unexpected finds will be assessed against the seven heritage criteria as outlined in the NSW Heritage Manual, including historical, associative, aesthetic or technical, social, research potential, rarity, and representativeness criterion. The aim of assessing significance is to identify if an unexpected find is of local or state significance. The assessment will guide recommendations for further management, approvals, and mitigations measures that may be required prior to recommencement of works

This UFP should be implemented if any potentially significant Aboriginal object or Non-Aboriginal archaeological remains are identified during proposed groundworks.

Examples of types of unexpected archaeological finds include:

- Potential Aboriginal flaked items
- Concentrations of artefacts this may take the form of a number of artefacts concentrated in a single location, typically associated with a dark silty soil deposit. Artefacts may include complete or broken glass bottles and ceramic items, animal bone and other domestic items.
- Structural remains i.e. brick or stone footings, areas of buried paving.

NSW Heritage Legislation and Protection

Three Acts afford protection to cultural heritage and archaeology in NSW:

- National Parks and Wildlife Act 1974 (NPW Act)
- Heritage Act 1977 (Heritage Act)
- Environmental Planning and Assessment Act 1979 (EP&A Act).

Aboriginal sites are protected by all three acts. It is an offence to knowingly or unknowingly damage or disturb an Aboriginal site without the appropriate approval. Fines and prison sentences may apply.

Historical archaeological sites in NSW are protected by the NSW *Heritage Act 1977*. Sections 139-145 of the *Heritage Act 1977* prevent the excavation or disturbance of land known or likely to contain **historic Archaeological Relics**, unless in accordance with an excavation permit or with the conditions of approval for a State Significant Development. If an archaeological site or object is damaged or disturbed prosecution may result.

Unexpected Finds Protocol

If unanticipated archaeological items are uncovered at any time throughout the life of the project the following actions must be followed:

- · Cease all activity in the vicinity of the find
- Leave the material in place and protect it from harm
- Erect a 10 m exclusion zone (temporary fencing/signage)
- Take note of the details of the material and its location, take a photograph of the find in situ
- Inform the site manager/area supervisor, who would then inform the superintendent / principal

The superintendent / principal must:

- Notify the Biodiversity and Conservation Division: (02) 6274 1111
- Notify OEH on the Environment Line: 131 555
- Call the archaeologist to identify whether additional investigation is required in accordance with the conditions of approval and OEH guidelines
- Notify OEH if confirmed as an Aboriginal object or relic
- Await further advice before proceeding with work in the area.

Artefact archaeologist contact

Artefact Heritage, Pyrmont Office 02 9518 8411, office@artefact.net.au

Examples of Aboriginal heritage and historical archaeological remains









APPENDIX O

Sustainability Management Plan

OAKDALE WEST INDUSTRIAL ESTATE -BUILDINGS 2C-2D

Sustainability Management Plan

Prepared for:

Goodman Property Services (Aust) Pty Ltd 1-11 Hayes Road Rosebery NSW 2018



PREPARED BY

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BASIS OF REPORT

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

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

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

DOCUMENT CONTROL

Reference	Date	Prepared	Checked	Authorised
630.30081-00400-R03-v1.0	19 April 2022	Dr Neihad Al-Khalidy	Horatio Cai	Dr Neihad Al-Khalidy
630.30081-00400-R03-v1.0	15 October 2021	Dr Neihad Al-Khalidy	Horatio Cai	Dr Neihad Al-Khalidy
630.30081-00400-R03-v1.0	10 November 2020	Dr Neihad Al-Khalidy	Horatio Cai	Dr Neihad Al-Khalidy



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APPENDICES

Appendix A Energy Saving Lighting Design Recommendations

Appendix B Water Saving Recommendations



1 INTRODUCTION

SLR Consulting Australia Pty Ltd (SLR) has been previously engaged by Goodman Property Services to prepare a Sustainability Management Plan (SMP) for the proposed warehouse and distribution facilities of Stage 3, Buildings 2C – 2D of Oakdale West industrial Estate (the Project).

A revised sustainability management plan is required due to the following key changes:

- Minor layout changes
- Minor area amendment

The SMP has been undertaken in accordance with the Secretary's Environmental Assessment Requirements (SEARs) for the State Significant Development SSD-9794683 and SSD-7348 MOD 6.

1.1 Objectives of the Study

The principal objective of this Sustainability Management Plan is to identify all potential energy savings that may be realised during the operational phase of the Project, including a description of likely energy consumption levels and options for alternative energy sources such as solar power in accordance with Council requirements.

The specific objectives of this plan are as follows:

- To encourage energy use minimisation through the implementation of energy efficiency measures;
- To promote improved environmental outcomes through energy management;
- To ensure the appropriate management of high energy consumption aspects of the Project;
- To identify energy savings procedures for overall cost reduction, greenhouse gas emission reduction and effective energy management;
- To assist in ensuring that any environmental impacts during the operational life of the development comply with Council's development consent conditions and other relevant regulatory authorities; and
- To ensure the long-term sustainability of resource use through more efficient and cost-effective energy use practices for the life of the development



2 SUSTAINABILITY MANAGEMENT GUIDELINES AND LEGISLATION

2.1 Building Code of Australia

The Building Code of Australia (BCA) is produced and maintained by the Australian Building Codes Board (ABCB) on behalf of the Australian Government with the aim of achieving nationally consistent, minimum necessary standards of relevant health and safety, amenity and sustainability objectives efficiently. The BCA contains mandatory technical provisions for the design and construction of BCA class buildings.

Volume 1, Section J of the BCA outlines energy efficiency provisions required for BCA class buildings (including Class 7b Warehouses and Class 5 Offices). There are 8 Deemed-to-Satisfy subsections, J1 to J8, that focus on separate aspects of energy efficiency as follows:

- J1 Building Fabric (i.e. the ability of the roof, walls and floor to resist heat transfer)
- J2 External Glazing (i.e. the resistance to heat flow and solar radiation of the glazing)
- J3 Building Sealing (i.e. how well parts of a building are sealed to ensure comfortable indoor environments are efficiently maintained)
- J4 Air Movement (i.e. the provision of air movement for free cooling, in terms of opening and breeze paths)
- J5 Air Conditioning and Ventilation Systems (i.e. the efficiency and energy saving features of heating, ventilation and air-conditioning systems)
- J6 Artificial Lighting and Power (i.e. power allowances for lighting and electric power saving features)
- J7 Hot Water Supply (i.e. the efficiency and energy saving features of hot water supply)
- J8 Access for Maintenance (i.e. access to certain energy efficiency equipment for maintenance purposes)

2.2 Sustainability Management Plan Requirements

The sustainability management plan for the Oakdale Site, Stage 3 is prepared in accordance with the following SEARs requirement:

- Greenhouse Gas and Energy Efficiency including an assessment of the energy use on-site and all
 reasonable and feasible measures that would be implemented on-site to minimise the development's
 greenhouse gas emissions.
- **Ecologically Sustainable Development** including a description of how the development will incorporate the principles of ecologically sustainable development in the design, construction and operation of the development.



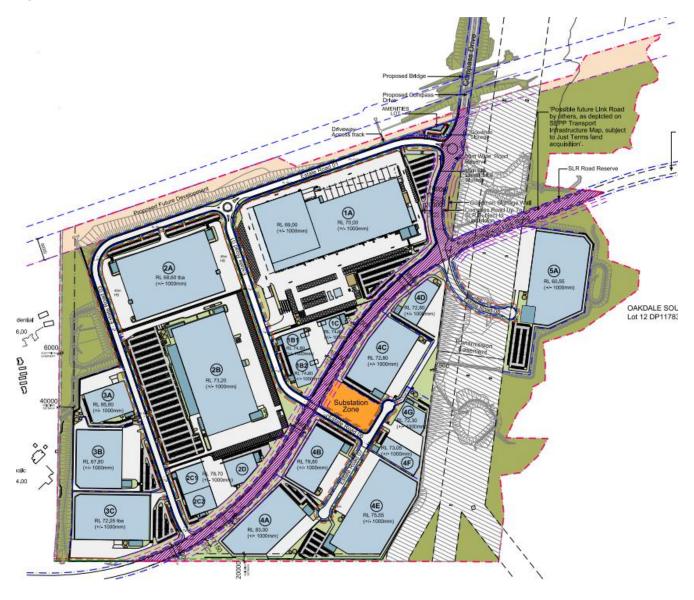
3 DESCRIPTION OF THE PROJECT

The Development Site, which is known as Oakdale West Industrial Estate, Kemps Creek, is located within the Penrith Local Government Area (LGA) in the Western Sydney Employment Area (WSEA). It is situated within an approved Concept Plan area, which forms part of the broader Oakdale Industrial Precinct.

The project is a staged development which includes bulk earthworks, civil works and the construction of infrastructure and stormwater management. The overall Oakdale West Masterplan is shown in **Figure 1**.

The current study covers the sustainability management plan and greenhouse gas reduction for the proposed warehouse and distribution facilities of Stage 3, Buildings 2C – 2D (the Project).

Figure 1 Oakdale West Estate Master Plan – Mod 6



3.1 Overview of Proposed Development

Goodman Property Services (Aust) Pty Ltd is developing the Oakdale West site at Lot 11 in DP 1178389 in Kemps Creek. This site will be comprised of industrial warehouses and office precincts, including internal roads, car parking spaces and hardstand.

The Oakdale West site is a precinct within the wider Oakdale Estate development and forms part of a progressive development designed to make Oakdale a regional distribution park of warehouses, office facilities and distribution centres.

The project is a staged development which includes bulk earthworks, civil works and the construction of infrastructure and stormwater management

The Buildings 2C - 2D comprises 37,370 m². Overall building areas are outlined in **Table 1**.

Table 1 Buildings 2C - 2D Areas

Site Area	Buildings 2C - 2D
Warehouse	15,745 m²
Offices (West and East)	1,055 m²
Dock offices (West and East)	0
Total Building Area (Warehouse + Office)	16,800 m ²
Awning	2,305 m ²
Hardstand Area	8,015 m ²
Light Duty Area	5,590 m ²
Car Parking	108

Further details of the Buildings 2C - 2D development are shown in Figures 2 - 5.

Figure 2 Oakdale West Estate: Buildings 2C - 2D

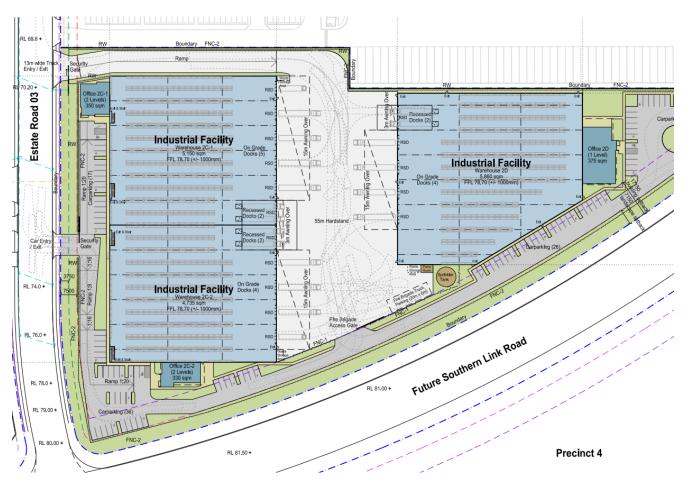
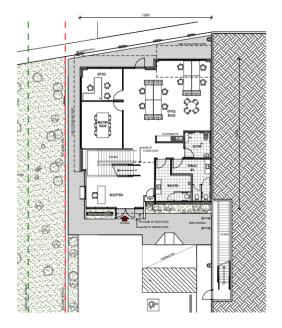


Figure 3 Oakdale West Estate: Buildings 2C - 2D - Office 2C1



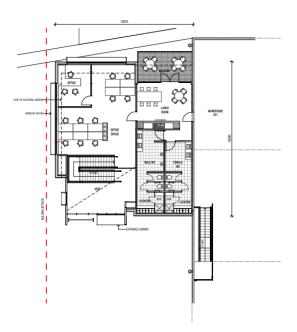




Figure 4 Oakdale West Estate: Buildings 2C - 2D - Office 2C2

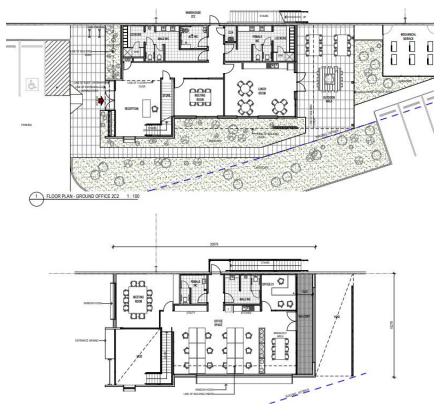
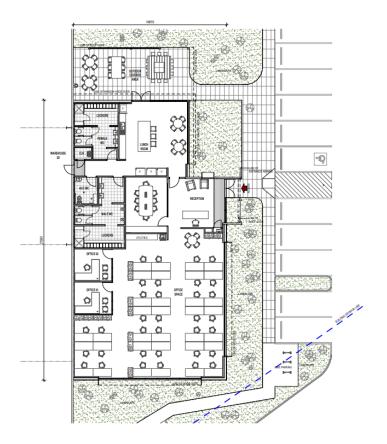


Figure 5 Oakdale West Estate: Buildings 2C - 2D - Office 2D2



OPERATIONAL ENERGY MANAGEMENT

Ineffective energy management for industrial and commercial premises can lead to unnecessary growth in greenhouse gas emissions and consumption of natural resources. Effective energy management reduces costs using energy efficiency measures and improves environmental outcomes locally, regionally and globally.

Effective energy management is achieved through the implementation of a Sustainability Management Plan (SMP) for the operational life of the Project.

3.2 Identified Major Energy Use Components

The major energy use components of the Project Site have been identified below based on information available within the Project Design Brief.

- Lighting (include natural and artificial lighting and shading);
- Air Conditioning; AND
- Power.

3.3 Energy Sources

The main source of energy for the proposed site is electricity.



4 SUSTAINABILITY MEASURES COMMITMENTS

4.1 **Documentation**

The documentations used in this report is listed in **Table 2**.

Table 2 Project Documentation Sources

Document Type	Document Number	Issue Date
Architectural Drawing	OAK 2C DA 20 (L) Drawing 20188 Building 2C Drawing Set	16/11/2021 15-29/10/2021
Goodman - Industrial - Design Brief - Base Building Rev 06	Project no 190119	04/06/2019

Energy Efficiency measures have been recommended and approved for project implementation and have informed the sustainability assessment of this project – they are listed in **Table 3**.

Table 3 ESD Assessment Summary

Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Design & Management	 Documentation of design intent and expected outcomes. 	 Communicate sustainability initiatives and operation to 	 Provision of Building Users Guide. Investigate costs and viability 	✓	 SLR recommends the preparation of Building User Guide that enables building
	 Appropriate commissioning. 	building users.Commissioning and building tuning required	of commissioning and building tuning requirements and appointing an	✓	users to optimise the building's environmental performance.
		by contractors and reviewed for 12 months after completion.	 independent commissioning agent. Independent consultant to perform quarterly tuning of fire, mechanical, electrical, hydraulic services. 	✓	 A sub-contractor will be engaged to maintain the facility in accordance with the operations and maintenance manuals during the 12-month defects liability period.
Façade Performance	 Optimised façade performance. 	 Achieve minimum performance requirements under NCC 	 Meet or exceed NCC Section J1 and J2 façade performance for conditioned spaces. 	✓	 NCC Section J report needs to be prepared by a qualified ESD consultant.
 Reduce heat gain through the warehouse façade. Daylight: even translucent warehouse Performance spaces app 	 Light coloured roofing with high reflectivity and appropriate insulation to reduce solar heat gain into 	✓	 This warehouse will comply with all the requirements specified within the report during construction stage. 		
		the warehouse.Daylight: evenly spaced translucent roof sheeting to	✓	Refer Architectural drawings	
		warehouses areas.	✓	As per project NCC Section J	
		 Performance glazing in office spaces appropriate to the window size and orientation. 		report.	



Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Social Sustainability	 Consider design with due regard to occupant satisfaction in accessibility, usability, Indoor air quality and public space utility. 	 High level of occupant satisfaction. Provide external as well as internal comfort. 	 Flexibility of space for potential future configurations. Use of Low VOC paints, carpets and sealants. Consider Landscaping and dense planting. Consider occupant user control eg A/C systems, glare reducing strategies, lighting etc. 	✓ ✓ ✓	 The design will incorporate open plan workspaces, offices, client rooms, meeting rooms, lunch room and outdoor seating area Low VOC paints, carpet and sealant will be used Refer proposed landscaping, Architectural Drawings Selection of endemic and low maintenance landscaping species Both AC and lighting control is provided to offices and warehouses.



Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Minimising Transport Impact	 Consider location with links to public transport and employee services. Consider location to reduce operational transport. Consider the impact of industrial trucks on local traffic. 	 Reward drivers of fuelefficient vehicles by providing spaces for small cars and or motorbikes. Provide alternatives to single-occupancy vehicles. Reduce operational fuel consumption through close proximity to major arterial roads. Reduce the impact of operational traffic on local communities. 	 Consider providing 10% of total parking spaces for small cars and 5% for motorbikes situated near the office entrance. The site is located within close proximity (<5km) to both the M7 and M4 motorways. The roads linking the site to the motorways are predominantly used for industrial traffic, as such the traffic is unlikely to impact on local areas. 	✓	 EV charges to 5% of car spaces provided 10 motorbike parking spaces provide. Refer Figure 2. Due to the location of the site, it is considered that staff bicycle riding will be unlikely, although if staff surveys indicate a preference for cycling, consider appropriate amenities. Car park numbers and provision for disabled parking are provided be in accordance with Consent Authority requirements.



Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Category Optimising IEQ	 Objective Optimise natural light to work environment. Optimise fresh air ventilation. Consider Thermal Comfort of occupants. Consideration of noise transference in space planning. Minimise use of materials that emit volatile organic compounds. Create a pleasant working environment. 	 Daylight: Daylight Factor (DF) of at least 2% at finished floor level under a uniform sky for at least 60% of the GLA. Thermal comfort: 95% of office areas have PMV levels between -1 and +1 for 98% of the year; Warehouse spaces include passive thermal comfort strategies. Finishes: 95% of all paints, adhesives & sealants and all carpet and flooring to be low-VOC finishes; use low- 	 Daylight: rationalised glazing to offices; high performance glass. Daylight: evenly spaced translucent roof sheeting to warehouse areas. Thermal comfort: Office envelope and HVAC system designed to meet thermal comfort requirements; Provide sufficient roof and wall insulation to the airconditioned spaces; Finishes: Specify and track correct finishes and wood products. 	Commitment ✓ ✓ ✓ ✓	 High performance glazing to all air-conditioned areas to satisfy Section J requirements Shown on the Architectural Drawings Refer Section 5.5 of this report for proposed set up temperatures Insulation as per the NCC requirements LED lighting and lighting
		formaldehyde wood products. • Electric lighting levels: 95% of GLA has a lighting system that is flicker free and has a maintained illuminance of no more than 25% above those recommended in AS1680.2.4, 2.1 and 0.1. • Reduce visual glare.	 Provide pleasant indoor and outdoor breakout spaces with sufficient daylight and plants. Lighting: Good light fixtures and well-designed layout. Ventilation: Consider increased fan and duct sizing. Provide sufficient shading and blinds with rationalised glazing for visual and thermal comfort. 	∨ ✓ ✓	 LED lighting and lighting controls to warehouse and offices. Adequate ventilation will be supplied in accordance with AS1668. Shown on the Architectural Drawings



Minimising Energy Use

- Consider passive design to minimise energy use such as orientation, ventilation, shading and floor plate design.
- Appropriate sizing of plant and equipment in heating and cooling, lighting, control systems,
- Building management systems and renewable energy sources.
- Reduce reliance on connection to grid electricity and gas.

- Target a 20% reduction in Greenhouse gas emissions.
- Energy sub-metering for all major uses greater than 100kVa; linked to monitoring system.
- High efficiency warehouse lighting and controls.
- Reduce energy for water heating.
- Integrated building management.
- Consider renewable energy generation for a portion of energy consumption and/or consider future-proofing the building for future installation.
- Reduce urban heat island effect and heat load through the roof by providing a highly reflective roof.
- Reduce office equipment load from 20W/m² to 15W/m².
- Optimise insulation for energy and thermal comfort.

- Roof Insulation, External Wall Insulations, Reduced Glazing area and associated heat loss in winter.
- Consider office air conditioning temperature setpoints for an increased comfort band.
- Provide energy efficient T5 lighting, with zoning and automatic controls where reasonable.
- Consider LED lighting strategies and advanced controls.
- Consider a solar hot water system or a heat pump.
- Sub-metering: install appropriate metering; develop metering and tracking strategy to allow for self-assessment, problem solving and ongoing improvements during operations
- Use roofing material that has a high Solar Reflective Index
- Investigate current insulation design and determine proposed options.

- Shown on the Architectural Drawing
- Design brief sets the temperature - Refer Section
 5.5 of this report.

✓

- LED lighting to warehouse and offices.
 - Lighting controls to warehouse and offices.
 - Solar hot water or heat pump system
 - Sub meters for major energy/water uses
 - Colourbond roof sheeting is proposed.
 - As per project NCC Section J report.



Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Choosing Materials	 With consideration to energy inputs in manufacture. Toxicity. Consequential impacts – rain forest timbers. Regional or local manufacturer employment support. 	 Reduce steel and cement in internal slab (10% reduction in embodied energy). Reduce embodied energy in concrete and plasterboard elements. Consider 95% of timber to be AFS or FSC certified. Reduce emissions associated with insulation and refrigerant. Reduce environmental impact of materials for tilling, awning. 	 Jointless fibre reinforced slab. Use pre-cast concrete panels with recycled content. Embodied carbon for the 2C-2D building to be 100% offset. 	✓	To minimise the environmental impacts of materials used by encouraging the use of materials with a favourable lifecycle assessment based on the following factors: • Fate of material • Recycling / re-use • Embodied energy • Biodiversity • Human health • Environmental toxicity • Environmental responsibility.



Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Minimising Waste	 By clever design. Contracted to builder as a requirement on site for construction waste. During the life of the building. And in dealing with building end of life options. 	 Reduce construction waste going to landfill by 90%. Reduce operational waste going to landfill. Consider a design that can be disassembled at the end of the building's life. 	 Contractor is to develop and implement a Waste Management Plan and track all waste going offsite to show that 90% of all construction waste is re-used or recycled. Waste storage and recycling facilities to be provided for different operational recycling streams such as paper, glass, plastics, metals, food waste etc. Consider operational waste plans and training for staff to provide incentive to reduce waste. 	✓	 SLR recommends more than 70% of the predicted construction waste arising from development can be reused (on-site or at another development) or recycled offsite. Refer project Waste Management Plan. The following waste avoidance measures are recommended in the Waste Management Plan for the Project: Provision of take back services to clients to reduce waste further along the supply chain.
Water Conservation and Reuse	 Monitoring of meters to track use. Timely maintenance of fixtures and fittings. Water sensitive landscape design. Source potable water alternatives such as rain water harvesting, grey and black water treatment. 	 Reduce potable water in internal fixtures. Reduce potable water for irrigation. Water efficient operation of appliances. Utilise rainwater and/or recycled water. 	 Water efficient sanitary taps and toilets. Water efficient and drought tolerant landscaping. Water and energy efficient dishwasher. Rainwater collection for toilets, irrigation and truck wash down. 	✓ ✓ ✓	 Low flow fixtures and fitting including taps and shower heads Selection of endemic and low maintenance landscaping species SLR recommends water efficient dishwashers 25 kL Rainwater tanks have been proposed for rainwater harvesting and re-use for landscape irrigation and flushing of toilets.



Category	Objective	Proposed Target	Proposed Strategy	Commitment	Comment
Land Use and Ecology Impact	 Consider local biodiversity impacts of flora and fauna. 	 Encourage biodiversity. Reduce light pollution from the site. 	 Install indigenous plating appropriate to the area and the adjacent biodiversity lots. 	✓	Selection of endemic and low maintenance landscaping species
3, ,	 Look to specialist advice on land in development. 	 Consider reducing impact of stormwater flows off the site into the natural 	 Design external lighting to avoid emitting light into the night sky or beyond the site boundary. 	✓	LED lights have been proposed for all external lights to avoid emitting light
	wate Rope	Ropes Creek adjacent to the site.	 Consider integrated stormwater management to minimise the impact on 	✓	The warehouse sustainability objectives include:
			receiving waters of flow volumes and pollution content, eg bioswales, bio retention, OSD tanks and treatment.	✓	 Reduce the impact of stormwater runoff and improve quality of stormwater runoff Achieve best practice stormwater quality outcomes
		 Consider permeable concrete/paving for staff parking areas and footpaths, etc. 		 Incorporate water sensitive urban design principles. 	



4.2 Baseline and Proposed Energy Consumption

An NCC Sections J Deem-to-Satisfy compliant building is used as the baseline building for energy consumption savings. NCC Section J provides the minimum requirement for energy efficiency and it is predicted that the proposed development will have more than 50.8% energy reduction - refer **Section 4.8** for the energy simulation results. The reduction has been enabled via:

- All luminaire shall be low energy LED type;
- Warehouse lighting is generally to be zonally controlled via motion sensor;
- Office lighting shall be controlled via dual technology infrared/ultrasonic sensor;
- Daylight harvesting function to office with external windows; and
- Efficient air conditioning system.

All building information and associated parameters are listed in the following sections of this report.

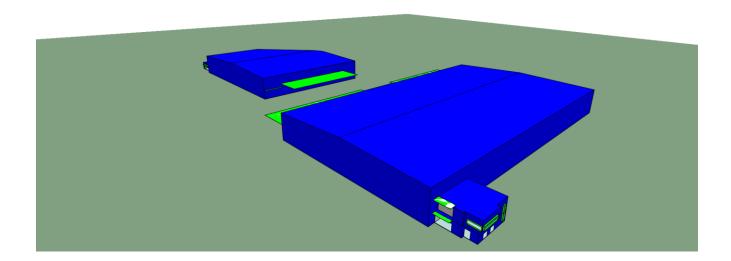
4.3 Energy Calculation of the Proposed and Reference Buildings

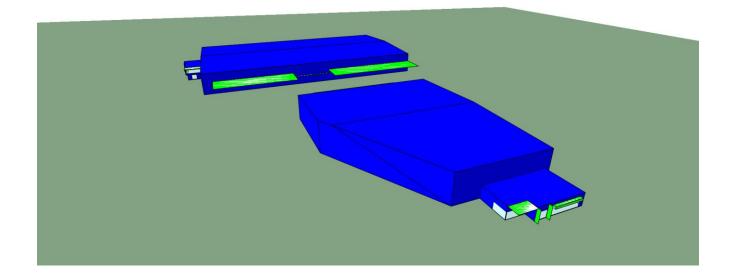
The Energy Simulation Program used in this study is the IES computer program Virtual Environment 2019 (VE). The program is based on the ASHRAE response factor and the modifications included utilising Australian weather data and including building materials more appropriate to those used in Australia and enabling the input of metric data.

- SLR supports a perpetual license of the Energy Simulation Software package IES <VE>;
- IES <VE> has passed the BESTEST (ASHRAE Standard 140) external validation process;
- The weather data from ACADS-BSG NSW Richmond Test Reference Year (TRY) is used for the modelling;
- IES<VE> assesses U-Value, SHGC, and shade coefficient when evaluating the effect of glazing;
- Detailed warehouse operating schedules are not available at this stage. Therefore, NCC standard building operating profiles such as occupancy, lighting, air conditioning and equipment were adopted for warehouse and office area; and
- At least 150 kW of PV system has been proposed for warehouse 2A.



Figure 6 Proposed Warehouses in IES Model





4.4 Artificial Lighting

In Section J6 of the NCC, the requirement for the total lighting power load within the proposed spaces of a building is to be no greater than a maximum illumination power load, measured in Watts (W). The maximum allowable building illumination power load is based on the total illumination power load calculated for each space.

For artificial lighting, the aggregate design illumination power load must not exceed the sum of the allowances. This may be obtained by multiplying the area of each space by the maximum illumination power density (as found in Table J6.2a of the NCC 2019 Volume One). The maximum illumination density for a storage warehouse is 4 W/m² as per Table J6.2a of the NCC 2019 Volume One.

The proposed warehouses will adopt the following energy efficiency measures to reduce the lighting energy consumptions:

Office lighting

- LED fitting for offices.
- Occupancy sensors to low occupancy areas e.g. office, toilets and lunch room.

Warehouse lighting

- LED fitting for warehouse.
- Occupancy sensors to low occupancy areas.

Outside lighting

- LED external lighting for all outside areas.
- External lighting will be controlled via daylight sensor (photocell).

Electrical lighting is the major energy reduction component for warehouse with a large footprint.

The lighting calculation for NCC reference building is based on the maximum illumination power density specified within NCC Table J6.2A as below:

- Warehouse = 4 W/m²
- Offices = 4.5 W/m²

The electrical lighting layout of the proposed building is not provided at the time of preparing this report. It is assumed the maximum design lighting power density will be achieved as below:

- Warehouse 3.5 W/m²
- Offices 4 W/m²

Therefore, the proposed building is likely to achieve a 12% lighting energy reduction when compared with reference building. Detailed calculation is shown in **Appendix A.**



4.5 Mechanical Air-Conditioning

The mechanical service design is not available at this stage. Performance reverse cycle package units to offices with individual controls. As per the mechanical specification of the Tenant Base Building Specification, air conditioning to be designed to the BCA/NCC section J and other statutory authorities and applicable Australian standards.

As per the mechanical specification of the Goodman's Tenant Base Building Specification, air conditioning to be designed to the BCA/NCC section J and other statutory authorities and applicable Australian standards.

Air-conditioning temperature control and set point - refer Table 4

Table 4 AC Unit Temperature Control Range

Space Type	Temperature Control Range (°C)
Offices	22.5±1.5°CBD

Air-conditioning energy efficiency requirements

2019 NCC Section J5.11 has specified the minimum energy efficiency ratios requirements for package air conditioning equipment.

Table 5 BCA Unitary Plant Requirement

Office Equipment	Minimum Energy Efficiency Ratio			
	NCC Requirement	Proposed System ¹		
Cooling	2.9	4		
Heating	2.9	4		

Note 1: Detailed Mechanical design is not available at this stage. It is assumed that the proposed package system will achieve the performance requirements above.

When the air flow rate of a mechanical ventilation system is more than 1000L/s, the system must have a variable speed fan when its supply air quantity is capable of being varied.

Details or NCC Section J5 certification demonstrating compliance will need to be submitted with the application for a Construction Certificate

4.6 Building Fabric Requirements

Parts J1 to J3 of the BCA Section J contain the requirements of the Deemed-to-Satisfy compliance of the building fabric. The purpose of this subsection is to ensure that the building fabric will provide sufficient thermal insulation to minimise heating and cooling loads placed on the building and the commensurate energy consumption HVAC systems servicing internal building spaces.

All fabrics of the proposed building shall comply with NCC Section J. A Project Section J report will need to be submitted with the application for a Construction Certificate.

4.7 Domestic Hot Water (DHW)

The BCA specifies the thermal efficiency for hot water systems to be at least 80%. The solar hot water reticulation system shall be provided to all faucets' fittings, equipment and apparatus within the development. Hot water will be generated from the roof mounted solar water packaged plant.

With the installation of water efficient fixture, the hot water consumption will be decreased and thus the domestic hot water usage will also decrease. If the domestic hot water usage is less than the energy required to heat to the water also decreases. Moreover, the supplement natural gas consumption will be reduced by using the proposed solar hot water system.

The energy simulation in this analysis is assumed both reference and proposed building are using same hot water system for DHW. The actual energy consumption will be reduced once solar hot water or electrical heat pump is adopted for the proposed building.

4.8 Simulation Results

The predicted Total Annual Energy Consumption of the NCC Reference Building and the Proposed Building is summarised in **Table 6**. For both buildings, temperatures lie within the range 16°CDB to 27°CDB for 100% of the plant operation time.

Table 6 Comparison of Annual Energy Consumption Between the Reference and Proposed Building

Electricity Usage	Reference Building (MWh)	Proposed Building (MWh)
Heating	9.32	6.76
Cooling	18.75	13.00
Auxiliary	5.56	5.15
Lighting	334.43	293.15
Equipment	assumed identical	assumed identical
DHW	assumed identical	assumed identical
PV System	-	-410.63
Total	368.06	-92.57

Note 1 these items are specific to a tenant's Fitout -hence assumed to be the same for the Reference and Proposed Buildings

By implementing all energy efficiency measures described in **Section 6**, the project is predicted to achieve a 125% GHG emission reduction when compared with NCC Reference Building.



5 POTABLE WATER CONSUMPTION

It is proposed that the Project will have a number of sustainable water-saving measures, including:

- Rainwater reuse and reticulation system Rainwater will be harvested from the roof and reuse for irrigation and toilet flushing. The reticulation will be a separate system to the domestic cold water with domestic water top up in the event of insufficient rainfall;
- Use of water saving plumbing devices; and
- Water sensitive landscape design.

Further to above sustainable water measures, the following items will be considered during the detailed design stage:

- Water efficient sanitary taps and toilets install higher WELS Rating sanitary fixtures such as 4 stars for water taps, urinals and toilet.
- Water and energy efficient dishwashers with minimum 4-star WELS water rating.

By installing 4 star rated toilets, urinals and taps and the proposed rainwater harvesting facility the proposed development will reduce its potable water demand by approximately 35%.

The quantities of each water fittings are assumed from the drawing and listed in **Appendix B**.



6 MONITORING AND REPORTING

All committed sustainability-related measures need to be commissioned and tuned once the project is completed, to ensure all services operate to their full potential and as designed.

As specified within the Tenant Base Building Specification, the building tuning will be provided by service contractors and overseen by an independent assessor, at least once a month within the Defects Liability Period (DLP) period to ensure that services are operating effectively and efficiently. Monthly reports to be provided to the tenant for DLP.

6.1 Energy Review and Audit

An energy usage review should be undertaken within the first few months of operation to ensure the Energy Management Plan is sufficient for the development's needs. A breakdown of energy usage per month at the Project Site will help to measure the development's baseline energy use and assess what appliances, equipment and processes are consuming energy.

An energy review is also necessary for the assessment of energy utilisation to further identify opportunities for improvement. Energy usage data obtained during the review process may be used to establish key performance indicators and annual energy targets for the Project.

Energy usage to be included in the review should include all purchased electricity and energy which is consumed by stationary equipment on site. Energy consumed by mobile equipment (e.g. forklifts) should also be examined as this will identify variations in warehouse operation efficiency. (Refer to 'Guidelines for Energy Savings Action Plans' (2005) (as developed by the former Department of Energy, Utilities and Sustainability) for reporting templates and further information.)

An energy audit and management review should also be undertaken on a half-yearly basis to ensure employees are following energy savings procedures correctly. Where audits show that energy savings procedures are not carried out effectively, additional employee training should be undertaken and signage and procedures reexamined.

The Energy Management Plan should be progressively improved and updated on an annual basis, or as required, to reflect changes to the Energy Management System and to promote continual improvement of energy management at the Project Site.

6.2 Energy Metering and Monitoring

To enable effective review of energy usage by the project, sub-metering should be implemented for all major energy consuming processes or items of equipment including sub-metering for all loads greater than 100 kVA.

Electrical equipment should be maintained to Australian Standards to ensure unnecessary energy wastage is minimised. Roof access system is proposed for third party access to roof for carry out necessary maintenance as required.

In accordance with the Goodman's Industrial Building Specification, a Building Users' Guide is to be prepared for the Project. The Building Users' Guide provides details regarding the everyday operation of a building and should include energy minimisation initiatives such as natural ventilation strategies, user comfort control, maintenance of air conditioning units and other electrical devices to ensure maximum operating efficiency, and lighting zoning strategies.



An effective Building Users' Guide will ensure that:

- Facility managers understand in detail their responsibilities for the efficient operation of the facility and any additional building tuning necessary to continuously improve energy management.
- Maintenance contractors understand how to service the particular systems to maintain reliable operations and maximum energy efficiency.
- Employees understand energy minimisation procedures and working limitations required to maintain design performance for energy efficiency.
- Future fit-out / refurbishment designers understand the design basis for the building and the systems so that these are not compromised in any changes.

6.3 Roles and Responsibilities

It is the responsibility of the facility manager to routinely check energy savings procedures are undertaken correctly (i.e. lighting turned off while areas of the development are not in use). The facility manager should also ensure all monitoring and audit results are well documented and carried out as specified in the Energy Management Plan.

Senior management should also be involved in energy management planning as an indication of the organisation's commitment to the Energy Management Plan.



7 CONCLUSIONS

SLR Consulting Australia Pty Ltd (SLR) has been previously engaged by Goodman Property Services to prepare a Sustainability Management Plan (SMP) for the proposed warehouse and distribution facilities of Precinct 2, Buildings 2C - 2D of Oakdale West industrial Estate (the Project). This report will form part of the Development Application to the Penrith City Council.

A revised sustainability management plan is required due to the following key changes:

- Minor layout changes
- Minor area amendment

This study has been prepared in accordance with the following Secretary's Environmental Assessment Requirements (SEARs) for the State Significant Development (SSD-9794683 and SSD-7348 MOD 6.

- Greenhouse Gas and Energy Efficiency including an assessment of the energy use on-site and all
 reasonable and feasible measures that would be implemented on-site to minimise the development's
 greenhouse gas emissions.
- **Ecologically Sustainable Development** including a description of how the development will incorporate the principles of ecologically sustainable development in the design, construction and operation of the development.

The principal objective of this Sustainability Management Plan is to identify all potential energy savings that may be realised during the operational phase of the project, including a description of likely energy consumption levels and options for alternative energy sources such as PV solar power.

A BCA Sections J Deem-to-Satisfy compliant building is used as the baseline building for energy consumption savings. BCA Section J provides the minimum requirement for energy efficiency and it is expected that the proposed development will operate energy efficiently via:

- 300 kW PV Solar system;
- Embodied carbon offset strategy;
- Daylight controlled LED lighting for the warehouse instead of metal halide, resulting in a considerable energy reduction and reduced maintenance;
- Motion sensors to all LED lights within the warehouse, and offices;
- Translucent roof sheeting to warehouse areas;
- Roof and external wall insulation as per the NCC requirements;
- High performance glazing to all air-conditioned areas or minimum NCC requirements;
- Passive solar design for external outdoor areas;
- Efficient air conditioning system;
- Power sub-metering to enable continued review of power consumption for the offices, and warehouse;
- Selection of endemic and low maintenance landscaping species;
- 40 kL rainwater tanks for rainwater harvesting and re-use for landscape irrigation and toilet flushing;
- Low flow fixtures and fittings including taps and shower heads;



- Electrical Vehicle (EV) charges to 5% of car spaces provided;
- Low VOC paints, carpet and sealant; and
- Other measures as detailed in this report.

By implementing all energy efficiency measures described in Section 6 of this report, the project is predicted to achieve a 125% GHG emission reduction when compared with NCC Reference Building.

By installing 4-star rated toilets, urinals and taps and the proposed rainwater harvesting facility the proposed development will reduce its potable water demand by approximately 35%.

In conclusion, the relevant ESD initiatives and Energy Efficiency measures outlined in this report are incorporated into the proposed building and development details. The proposed ESD initiatives will help to achieve significant reductions in the energy required by the development both in building and operation.

Building tuning will be conducted by builder and SLR recommends that quarterly reviews of actual building energy and water consumption be carried out once the warehouses are operational to check the actual energy usage and energy savings and verify that all systems are performing at their optimum efficiency. This will provide an opportunity for the systems to be tuned to optimise time schedules to best match occupant needs and system performance while satisfying the sustainability target for the project.



APPENDIX A

Energy Saving Lighting Design Recommendations

			BC	A Lighting Requirements Oakdal	e South 2C+2D				
BCA Comply Building			Area	Operating Hrs	Lighting Control			Total Annual Energy Consumption (kWh)	
	Warehouse W/m2	4	15745	Monday to saturday 24 hours	Motion Detector, Daylight Sensor	0.9	0.6	297104	
	Offices W/m2	4.5	1055	Monday to saturday 24 hours	Motion Detector	0.9	1	37327	
			16800				Total	334431	
			10000				kWh/m2	19.91	
			Prop	osed Lighting Requirements Oak	dale South 2C+2D				
BCA Comply Building	BCA Requirements Area		Area	Operating Hrs	Lighting Control		Total Annual Energy Consumption (kWh)		
	Warehouse W/m2	3.5	15745	Monday to saturday 24 hours	Motion Detector, Daylight Sensor	0.9	0.6	259966	
	Offices W/m2	4	1055	Monday to saturday 24 hours	Motion Detector	0.9	1	33179	
			16800				Total	293146	
							kWh/m2	17.45	

APPENDIX B

Water Saving Recommendations

Area				
	Toilets	Urinal		howers
Amenities	20	/	23	6
Total .	20	7	23	6
Assume 70% of toilet w	ater usage is supplied by rainwater			
Fraction not supplied	0.3			
Table B2 - Results	s			
No water saving measu		Max water usa		
Toilet	Adopt 3* Average Flush Usage in Table C3		L/s	
Гар	Adopt 3* Tap Usage in Table C3	207		
Jrinal	Adopt 3* Urinal Usage in Table C3		L/s	
Water reuse measures		Max water usa		
Toilet	Adopt 4* Average Flush Usage in Table C3		L/s	
Гар	Adopt 4* Tap Usage in Table C3	172.5		
Jrinal	Adopt 4* Urinal Usage in Table C3	10.5		
Water reuse measures	s (5*) with RWH	Max water usa		
Toilet	Adopt 5* Average Flush Usage in Table C3		L/s	
Гар	Adopt 5* Tap Usage in Table C3	138		
Jrinal	Adopt 5* Urinal Usage in Table C3	7	L/s	
	3* with RWH	4* with RWH	5* with RWH	
mprovement Percent	22	35	47	
Calculation Notes				
Water usage rate per	use = Number of items in Table C1 x Usage rate in Table C3			
Assume total water us	sage is proportional to max water usage rate			
	age = % difference between 3* rated fixtures max water usage	rate with no		

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