Construction Environmental Management Plan

Integrated Nepean Hospital Project – Stage 2 Main Works

Project number:	N01074
Document number:	NHR-CPB-MPL-PMT-TB2-PLN-000PP11

Document Approval

Rev.	Date	Prepared by	Reviewed by	Approved by	Remarks
1	07/06/2023	D.Borgia	R Vranjesevic	Marc Van Heemst	
4	26/02/2024	V.Alvaro	R Vranjesevic	Marc Van Heemst	
Signature:					

Details of Revision Amendments

Document Control

The Project Manager is responsible for ensuring that this document is reviewed and approved.

The Project Environmental Representative is responsible for reviewing and updating this document to reflect changes to environmental, legal and other requirements as required.

Amendments

Any revisions or amendments shall be approved by the Project Manager and/or client before being distributed, communicated and implemented.

Revision Details

Revision	Details
1	Draft CEMP complying with SSDA Condition B15 and issued for approval.
2	Updated CEMP to incorporate DPE comments.
3	Updated CEMP to incorporate DPE comments.
4	Updated CEMP following review

Definitions

Term or Abbreviation	Definition
ASS	Acid Sulfate Soils
Compliance audit	Verification of how implementation is proceeding with respect to a CEMP (which incorporates the relevant Approval conditions)
CoA	Condition of Approval (SSD16928008)
CMS	CPB Management System
CPB	CPB Contractors Pty Ltd
DPE	New South Wales Department of Planning and Environment
EMP	Environmental Management Plan
EMS	Environmental Management System
Environmental aspect or hazard	Defined by AS/NZS ISO 14001 as an element of an organisation's activities, products or services that can interact with the environment. The term 'hazard' is used throughout this EMP and has the same meaning as 'aspect' for the purposes of compliance with ISO14001 requirements.
Environmental impact	Defined by AS/NZS ISO 14001 as any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
Environmental incident	An unexpected event that has, or has the potential to, cause harm to the environment and requires some action to minimise the impact or restore the environment.
Environmental objective	Defined by AS/NZS ISO 14001 as an overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.
Environmental policy	Statement by an organisation of its intention and principles for environmental performance.
Environmental target	Defined by AS/NZS ISO 14001 as a detailed performance requirement, applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
ESCP	Erosion and Sediment Control Plan
EWMS	Environmental Work Method Statement
Hold point	A verification point that prevents work from commencing prior to approval from the appointed authority.
Incident	As per definition in SSD16928008, *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
Material Harm	As per definition in SSD16928008, *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* *b) 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)*
Non-compliance	Failure to comply with the requirements of the Project approval or any applicable licence, permit or legal requirements
Non-conformance	Failure to conform to the requirements of Project system documentation including this CEMP or supporting documentation

Term or Abbreviation	Definition
PCC	Penrith City Council
PESCP	Progressive Erosion and Sediment Control Plan
SEP	Site Environmental Plan(s), can also be referred to as Environmental Control Maps (ECMs)
SSD	State Significant Development
WSUD	Water Sensitive Urban Design

Contents

1. Structure of this Plan

This Construction Environmental Management Plan (CEMP) outlines how we will achieve acceptable environmental outcomes on the Integrated Nepean Hospital Project, Stage 2 Main Works by the application of the CPB Contractors Environmental Management System (EMS). A copy of the most recent revision of this plan is to be retained on site for reference and compliance.

In addition to the Project Management Plan, other Project Plans that interface with the Environmental Management Plan include:

- Construction Management Plan
- Engineering and Design Management Plan
- Quality Management Plan
- Safety and Health Management Plan
- Completion Management Plan.

This EMP has the following structure:

Part A: Overview	This section outlines the: ▪ EMP Scope ▪ Objectives and Targets ▪ Environmental Management System (EMS) Structure ▪ Summary of the potential Project Significant Environmental Aspects
Part B: Implementation Plan	This section outlines EMS Elements (systems and processes) as follows: ▪ CPB Requirements and Expectations ▪ How they will be met ▪ Responsibilities ▪ Associated deliverables / tools
Part C: Sub-plans	This section contains Sub-plans to manage Significant Environmental Aspects and other environmental aspects associated with the Project
Part D: Appendices	This section includes the following policies and system tools: ▪ Environmental Policy and ISO 14001 Certification ▪ Environmental Roles and Responsibilities ▪ Environmental Obligations Register ▪ Monitoring, Inspections, Reporting, Review and Audit Schedule ▪ Site Environment Plan(s) as applicable.

2. Overview

2.1 Project Scope

CPB Contractors has been contracted by Health Infrastructure NSW to provide a Construction Environmental Management Plan for the Integrated Nepean Hospital Project Stage 2 Main Works.

The scope for the Project is to complete a major re-development of Nepean Hospital Campus and provide an advanced integration with existing community health centres within the surrounding wider Penrith Local Government Area.

The Main Works Project's scope of work includes:

- Demolition of the existing Nepean Redevelopment Project Office, Hope Cottage, Doctor's Accommodation, North Block Pathology and TAMS Office.
- Detailed excavation, inground services and sub-structure piling works.
- Construction of an 8-storey structure that will connect into Stage 1 existing tower.
- Reconfiguration/Upgrade of the loading dock area & back of house functions.
- Barber Avenue upgrade and access road to Stage 2 tower.
- Landscaping and at-grade work within Stage 2 footprint.
- North Block Façade Replacement
- Tower 1 west façade cladding replacement.
- Removal of Temporary Link Bridge.
- Nuclear Medicine Fit out on Level 2 TB1.

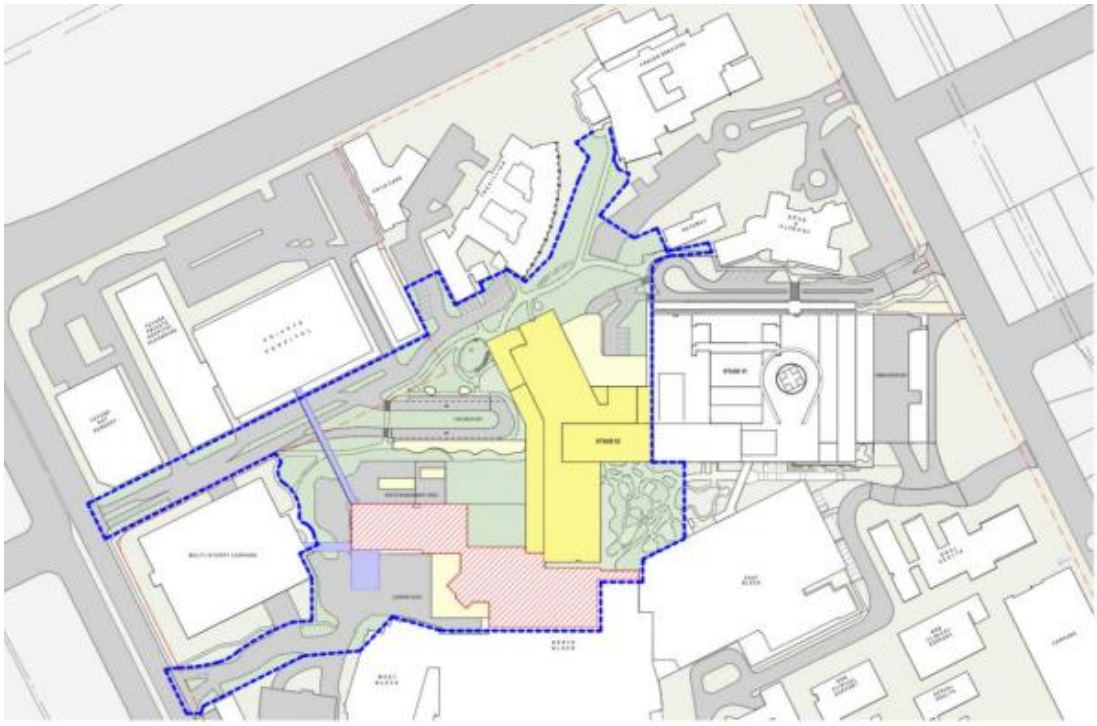


Figure 2-1: Site Location (Source EIS)

The Stage 2 building footprint shown in Figure 2-1 in yellow with scope of works generally within the blue outline. Figure 2-2 provides an artistic impression of the completed hospital after completion of the Stage 2 works.

Figure 2-2: Artistic impression of completed Hospital following completion of Stage 2 works (Source EIS)

Development Consent Application number SSD-16928008 was obtained on 9 December 20222 in accordance with Section 4.38 of the *Environmental Planning and Assessment Act 1979*. Compliance requirements relating to the Consent will be tracked as detailed in Appendix C. Details of environmental compliance requirements relating to the CEMP are included in Table **2-1** in relation to Stage 1 Crown Certificate which are relevant to the CEMP and subplans where each condition has been addressed within this Plan or the wider CPB Contractors Management System.

Table 2-1 - SSD-16928008 Development Consent CEMP Requirements

Condition	Content requirements	Where addressed
B14	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020)	Table 2-2
B15	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following:	This Plan Construction Environmental Management Plan
a.	Details of: (i) hours of work;	Section 2.6
	(ii) 24-hour contact details of site manager;	Section 2.7
	(iii) temporary site office arrangement;	Construction Management Plan
	(iv) management of dust and odour to protect the amenity of the neighbourhood;	Section 8.4
	(v) stormwater control and discharge;	Erosion & Sediment Control Plan (Appendix K)
	(vi) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; and	Erosion & Sediment Control Plan (Appendix K)
	(vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	

Condition	Content requirements	Where addressed
b.	an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	Section 2.6 Heritage Management Sub-Plan
c.	Construction Traffic and Pedestrian Management Sub-Plan (see condition B16);	Appendix E – Construction Traffic and Pedestrian Management Sub-Plan
d.	Construction Noise and Vibration Management Sub-Plan (see condition B17); and	Appendix F - Noise & Vibration Management Sub-Plan
e.	Construction Waste Management Sub-Plan (see condition B18)	Appendix G - Construction Waste Management Sub-Plan
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and TfNSW; (c) detail: (i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; (ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs; (iii) heavy vehicle routes, access and parking arrangements; (iv) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; and (v) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s).	Appendix E - Construction Traffic and Pedestrian Management Sub-Plan
B17	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced noise expert; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers, including existing patient care buildings within the hospital campus; (d) include strategies that have been developed with stakeholders for managing high noise generating works; (e) describe the consultation undertaken to develop the strategies in condition B17(d); (f) include a complaints management system that would be implemented for the duration of the construction; and (g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B14.	Appendix F - Noise & Vibration Management Sub-Plan

Condition	Content requirements	Where addressed
B18	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following: (a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain; (b) information regarding the recycling and disposal locations; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.	Appendix G Construction Waste Management Sub-Plan
B21	Prior to the commencement of construction, the Applicant must: (a) install erosion and sediment controls on the site to manage wet weather events; and (b) divert existing clean surface water around operational areas of the site.	Construction Environmental Management Plan Appendix K - Erosion & Sediment Control Plan
B22	Prior to the commencement of construction, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.	Construction Environmental Management Plan Appendix K - Erosion & Sediment Control Plan
C13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Sub-Plan	Appendix F - Noise & Vibration Management Sub-Plan
C14	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C4.	Appendix F - Noise & Vibration Management Sub-Plan
C15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	Appendix F - Noise & Vibration Management Sub-Plan
C16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time)	Appendix F - Noise & Vibration Management Sub-Plan
C17	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C16.	Appendix F - Noise & Vibration Management Sub-Plan
C18	The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Sub-Plan, approved as part of the CEMP required by condition B17	Appendix F - Noise & Vibration

Condition	Content requirements	Where addressed
	of this consent.	Management Sub-Plan
C19	For the duration of the construction works: (a) within one week prior to any removal of vegetation a pre-clearance survey is required to be undertaken by a qualified ecologist to identify, number and flag hollow-bearing trees and other habitat features such as nests or hollow logs proposed to be removed. The results of the pre-clearance survey are to be submitted to the Certifier to inform tree clearance protocols; (b) during any tree removal, an experienced and qualified ecologist is to be present to re-locate any displaced fauna that may be disturbed during this activity. All non-habitat vegetation is to be cleared first to allow appropriate space for the felling of habitat trees and retrieval of any fauna that may be present within habitat trees. Trees with hollows are to be lopped in such a way that the risk of injury or mortality to fauna is minimised, such as top-down lopping, with lopped sections gently lowered to the ground, or by lowering whole trees to the ground with the "grab" attachment of a machine. Any injured fauna is to be appropriately cared for and released on site when re-habilitated; (c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Development Assessment Report (prepared by Moore Trees and dated 25 November 2021); (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater; and (e) mitigation measures outlined in Table 6-1 of the submitted Biodiversity Assessment	Appendix H - Arboriculture Development Assessment Report
C22	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	Appendix K - Erosion & Sediment Control Plan
C36	Remediation of the site must be carried out in accordance with the Remediation Action Plan prepared by JK Environments and dated 14 December 2021 and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	Appendix L – Remediation Action Plan

2.2 EMP Scope

This EMP has been developed in accordance with CPB's 'The Way We Operate' framework. The framework aligns with AS/NZ ISO 9004:2011 *Managing for the sustained success of an organisation* – a quality management approach which has been specifically adapted for CPB.

As a key project document, the EMP integrates environmental management requirements, client obligations and community expectations during project delivery. It provides environmental management protocols for the design and construction and operation and maintenance stages of the Project.

Specifically, the EMP:

- Identifies the environmental management obligations relevant to the Integrated Nepean Hospital Project Stage 2 Main Works and lists all applicable environmental legislation, permits and approvals
- Identifies environmental hazards (aspects), potential impacts and risks associated with the works
- Identifies reasonable and feasible measures to reduce the environmental impact of the Project
- Assists in the prevention of unauthorised environmental impacts
- Fulfils CPB Contractors' EMS requirements, enabling continued certification to ISO14001.

Construction of the project must be carried out in accordance with the most recent version of the CEMP and associated sub-plans.

Table 2-2 DPIE Guideline for the Preparation of Environmental Management Plans Content Checklist

Does your EMP contain	Yes	Reference
Introduction (EMP Guideline Section 3.2)		
Purpose and Scope	✓	Section 1
Conditions of Consent	✓	Section 2.1
EMP objectives	✓	Section 2.4
Environmental Policy	✓	Section 3.1 Appendix A
Project Description (EMP Guideline Section 3.3)		
Project Overview	✓	Section 2.1
Site Location Plan	✓	Section 2.1
Scope of Works	✓	Section 2.1
Timing of Activities	✓	Section 2.1
Community and Stakeholder Engagement (EMP Guideline Section 3.4)		
Community and Stakeholder Engagement	✓	Element 6
Environmental Management Framework (EMP Guideline Section 3.5)		
EMP context	✓	Section 2.2
Environmental management structure and responsibility	✓	Section 33
Legal and Compliance requirements	✓	Element 3 Appendix C
Training and awareness	✓	Element 7
Environmental Risk Assessment	✓	Section 3.2 Element 4
Hold Points	✓	Element 3
Environmental management measures	✓	Part C Sub Plans
Environmental monitoring program	✓	Part C Sub Plans Appendix D
Reporting	✓	Element 12

Does your EMP contain	Yes	Reference
		Appendix D
Environmental Inspections	✓	Appendix D
Environmental control plans or Maps	✓	Section 3.2 Appendix E
Environmental Management Documents	✓	Element 11
Compliance Monitoring and Reporting	✓	Appendix D
Environmental Auditing	✓	Element 12 Appendix D
Environmental incident and emergency planning, preparedness and response	✓	Element 9 Element 10
EMP review	✓	Element 12

CPB Contractors Environmental Policy is contained in **Appendix A**.

The CPB Project Manager, with input from the CPB Environmental Representative is responsible for implementation of the Plan. Environmental Roles and Responsibilities are set out in **Appendix B**.

2.3 Environmental Management Obligations

A Project Environmental Obligations Register is contained in Appendix C. This register lists the following environmental management obligations and how the obligations will be implemented:

- Applicable legislation
- Contract requirements
- Project approval requirements
- Other associated obligations or commitments

The register will be reviewed regularly, and updates made as necessary. The Project Environmental Representative (or delegate) is responsible for updating this register.

2.4 Objectives and Targets

The Project has set the following environmental performance targets in Table 2-3 and Table 2-4. These include current business plan environmental targets for the Business unit and the whole of CPB Contractors.

Table 2-3 Leading indicators

Key Performance Indicator	Target	When	How measured	Accountability
Environmental training	100% of scheduled training completed on time	Prior to relevant activities	Based on environmental risks and the qualifications and experience of the Project workforce	Project Director Project Manager
Significant Environmental Aspect Management	Significant Environmental Aspect (SEA) Review	Each quarter	SEA Review Template	Project Director Project Manager
Environmental management review of Work Packs	100%	Prior to activity commencement	WP sign-off/ Review register	Project Manager Project Engineer

Key Performance Indicator	Target	When	How measured	Accountability
		/ quarterly reviews		
Env. Audits	100% of scheduled audits completed.	As per project obligations and (minimum 1 per annum)	Synergy / Monthly env dashboards	Project Environmental Representative
Completion of inspections	100 %	Each month	Inspections of environmental controls to be identified, scheduled and conducted	Project Environmental Representative (or delegate)
Action Management	>80% of all env actions raised are completed on time. Calculated as actions closed on time/ actions due during period.	Each month	Synergy / Monthly env dashboards	Project Director Project Manager
Engagement	Subcontractor forums	1 per Project / quarter	Synergy	Project Director Project Manager

Table 2-4 Lagging Indicators

Key Performance Indicator	Target	Time Frame	How measured	Accountability
Level 1 & 2 environmental incidents	Zero	Ongoing	Incident reporting	Project Director Project Manager/ Construction Manager
Number of actions taken by regulators and/or client	Zero	At all times	Implementation of the EMP	Project Director Project Manager
Area of land cleared or disturbed without authorisation	Zero ha	At all times	Implementation of the Fauna and Fauna Sub-plan	Project Director Project Manager
Number of unauthorised discharges	Zero	At all times	Implementation of Soil and Water Sub-plan	Project Director Project Manager
Damage to heritage items or places without relevant approvals	Zero		Implementation of Heritage Sub-plan	Project Director Project Manager
100% of all fuel use and greenhouse gas (GHG) emissions generated by the project is captured and entered into JDE (NGER reporting requirement).	All use / emissions entered into JDE System	Monthly	Implementation of Energy Sub-plan	Project Director Project Manager
% of waste reused or recycled	[75%] of waste generated [note waste types excluded from	12 months	Implementation of Waste Sub-plan	Project Director Project Manager

Key Performance Indicator	Target	Time Frame	How measured	Accountability
	calculation will be defined]			

2.5 Key Environmental Stakeholders

Key environmental stakeholders related to the project and their contact details are listed in Table 2-5.

Table 2-5 Stakeholder Information

Stakeholder Organization	Representative	Contact Details
NSW Health Infrastructure	Joe Romeo	Joseph.Romeo@health.nsw.gov.au 0467 776 209
T&T	Adam Mardini	Adam.Mardini@turntown.com 0404 252 200
CPB Contractors Pty Ltd	Marc Van Heemst (PD) Robert Vranjesevic (PM)	0411 442 034 Marc.VanHeemst@cpbcon.com.au 0488 888 242 Robert.Vranjesevic@cpbcon.com.au
CPB BU Environmental Representative	Andrew Zvirzdinas	0480 212 828 Andrew.Zvirzdinas@cpbcon.com.au
CPB Project Environmental Representative	Nava Tiari	0402 921 428 Nava.Tiari@cpbcon.com.au
Penrith City Council	Hamish Dodson	(02) 4732 7777
NSW Department of Planning, Housing and Infrastructure (DPHI)	N/A	1300 420 5961 555 information@planning.nsw.gov.au
Building Compliance – Certifying Authority	Adam Durnford	0499 088 065 02 9211 7777 adam@bmplusg.com.au
Site Manager 24hr Contact	Roger Bell	0429 334 801 Roger.Bell@cpbcon.com.au

2.6 Hours of Work

In accordance with CoA C4, construction, including the delivery of materials to and from the site, may only be carried out between the following hours:

a) between 7am and 6pm, Mondays to Fridays inclusive; and
b) between 8am and 1pm, Saturdays.

There is no work to be carried out on Sundays or public holidays

CoA C5 states notwithstanding the requirements of condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:

(a) between 7am and 8am, Saturdays; and
(b) between 1pm and 5pm, Saturdays.

In the event that construction works are required to be carried outside of the hours indicated in CoA C4 and C5, they can only be undertaken in the following circumstances if required as specified in CoA C6:

(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or

(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or
(c) where the works are inaudible at the nearest sensitive receivers; or
(d) for the delivery, set-up and removal of construction cranes, where notice of the crane related works is provided to the Planning Secretary and affected residents at least seven days prior to the works; or
(e) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works.

Notification must be given to affected residents of such work occurrences before undertaking the activities or as soon as is practical afterwards in accordance with CoA C7.

Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours in accordance with CoA C8:

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

2.7 Site Noticeboards and Notifications

In accordance with CoA C1, a site notice(s) must be prominently displayed at the boundaries of the project site during construction for the purpose of informing the public of project details. The notice must satisfy the following requirements:

- minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size;
- the site notice(s) must be durable and weatherproof and must be displayed throughout the works period;
- the approved hours of work, the name of the builder, Certifier, structural engineer, site/project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s); and
- the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.

In accordance with CoA B1, notification to DPHI of the intended date of construction, at least 48 hours before the intended date is required. Where staging is proposed, DPHI must also be notified in writing 48 hours prior to the commencement of each stage of construction.

3. Environmental Management System

3.1 System Overview

3.1.1 Governance documentation

The CPB Environmental Management System (EMS) is based on the requirements of the CPB Management System (CMS).

The CMS is certified to conform to AS/NZS ISO 14001:2016 Environmental management systems – Requirements with guidance for use.

Evidence of certification is included in **Appendix A**.

The CMS has been developed and implemented to ensure a consistent approach to project delivery and foster continual improvement.

As shown in Figure 3-1 the management system comprises the following components:

- Overarching Board Governance
- A Policy is a statement of commitment and lists the mandatory requirements for individuals of the organisation to comply with.
- Procedures and Work Instructions specify how to undertake and control specific activities. Where appropriate, and following CPB Business Unit approval, project specific procedures are produced to include specific project details.
- Tools are preformatted documents such as forms and templates that are required to be completed as part of following a Procedure.
- Knowledge documents are reference material to provide context, additional information or guidance to a Policy or Procedure.
- Business Applications are the software tools used to support CPB activities and Procedures.

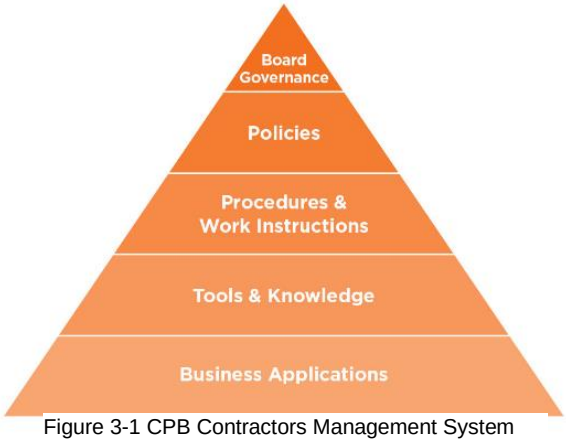


Figure 3-1 CPB Contractors Management System

3.1.2 Environmental Management Plan (EMP)

Each project team maintains a Project specific EMP (this document) that describes the actions to comply with each Element and Expectation.

Implementation of the Project EMP demonstrates due diligence by nominating and monitoring the following:

- Contractual environmental requirements are being fulfilled
- The Project is compliant with all relevant environmental legislation
- Environmental impacts are avoided where possible, or minimised.

3.2 Ongoing environmental risk identification and management in construction

Risk identification and management processes are a key focus in developing and implementing all EMS documentation. The objective of these processes is to confirm that the Project is designed and constructed within acceptable limits of risk to personnel and the environment.

To assist in initial environmental risk identification, a review of potentially significant environmental aspects and impacts has been undertaken in Section 4 to determine the specific environmental sub plans required.

Ongoing environmental risk and opportunities identification will be a key consideration during all Project risk assessments, as per our Risk Management Plan, including:

- Project Risk Register

- Construction Area Plan (CAP) risk assessments
- Work Packs, including Work Pack Risk Assessment
- Environmental Work Method Statements (EWMS) or Safe Work Method Statements (SWMSs), which address environmental risks (as applicable)
- Pre-start meetings.

We will prepare the risk assessment and planning documents detailed in Table 3-1 to ensure the Project is constructed safely, that we minimise environmental impacts and comply with Approval, licence and contractual obligations. Our robust process will include a cross-functional review and sign-off at key stages.

Table 3-1 Key construction planning documents

Key planning document	Description
CAP	The planning document for each construction area, CAPs will include overall construction approach and methodology, Construction Area Plan Risk Assessment (CAPRA), constructability reviews and associated Work Pack listing
Work Pack	A Work Pack is a document containing all the information required to manage an activity. There will be multiple Work Packs referenced in each CAP. Each Work Pack will include a step-by-step breakdown of the activity to be undertaken, work method statement, sequencing, inspection and test plans (ITPs), SWMSs, relevant drawings, and environmental controls. Work Packs will be developed to provide an integrated approach to the management of safety, quality and environmental risks, as set out in our Construction Management Plan. During construction planning for each work area, work methods will be reviewed, the risks identified during the design phase will be re-assessed, and new risks identified and recorded in the Work Pack for communication to field staff. All controls necessary to ensure compliance will be included in the Work Packs, which will reference the relevant SEPs, procedures, checklists and forms. Work Packs may identify the need for amendment to an existing SEP or preparation of a new SEP. Work Packs will be approved by the Project Environment Representative or delegate prior to commencement of works described in their scope. Relevance and adequacy of environmental controls identified in Work Packs will be reviewed and where required, updated.
SWMS or EWMS	A SWMS or EWMS description of methodology will be required to complete an activity. It will describe the prescriptive sequence of tasks to be undertaken. Depending on the activity's complexity or if the same activity is being repeated elsewhere, the work method statement may be a separate document included in the Work Pack. The development of EWMSs or SWMSs will be conducted and formally recorded for relevant activities prior to their commencement. They will include environmental hazards and their mitigation for that task. Its purpose will be to communicate task methodology in detail to the workplace personnel who are completing the task. Field staff will review and sign onto these documents, including the risk assessment and safe work systems, as part of a pre-start meeting. EWMS/ SWMS task-specific information will include work steps (in sequence) with work-step precautions, associated hazard(s) and hazard control(s), specific personal protective equipment, equipment available onsite, responsibilities, competencies and where applicable, permit conditions. The environmental context of a SWMS will be included to prompt consideration in the task steps, to address the positive actions of environmental care (i.e. dust control, erosion prevention, waste recycling, etc.) and address negative actions that may introduce an environmental impact (i.e. contamination, pollution, etc.).
Pre-start meeting	A pre-start meeting is a review of work progress and activities planned for the incoming shift focused on creating a positive environment, safety and quality culture and continually improving work habits, generating greater workforce involvement and increasing accountability. It will:

Key planning document	Description
	▪ Identify any changes that are to be made to the work or work environment, including impacts of nearby or interfacing work ▪ Include any environment or safety hazards reported and incidents that were reported on previous shifts. Construction directors and Project managers will ensure that site supervisors conduct daily pre-start meetings with all members of the work team prior to commencing work for each shift. These meetings will typically be conducted by a Supervisor or his/her approved delegate with individual work crews. Attendance at the pre-start meeting will be mandatory. Content of the pre-start meeting will be recorded, including any issues raised as well as attendance. Pre-start meetings will be held to ensure all workers are informed about hazards in their work area prior to start of the work. It will be used in conjunction with the SWMS document to ensure current on-site conditions (and hazards) are considered with those identified in the SWMS document, particularly looking for what conditions have changed (e.g. new workers, weather, changed materials, etc.) since the work was previously undertaken, i.e. the day or shift before. The pre-start meetings will contribute to implementing a safe work habit of checking the immediate surroundings and workplace conditions before starting, including considering potential environmental impacts.
Site Environment Plans (SEPs)	SEPs are site specific A3 sheets that include detailed plans illustrating key environmental controls, and tables documenting key requirements. These will inform and fully integrate with detailed construction planning.

The Project Environmental Representative or delegate will have approval authority for all risk assessment types (except SWMSs and pre-start meetings – these will be signed by supervisors) to ensure environmental risks and opportunities are adequately raised and addressed.

In addition as set out in Section 4, sub-plans will include a section that identifies key aspects and potential environmental impacts, which will also be used to inform development of specific management strategies to be applied across the Project.

Identified environmental risks, controls and accountabilities will be communicated to all relevant personnel through preparation and communication of our environmental Sub Plans, CAPs, Work Packs, SWMSs/EWMSs, SEPs, toolbox meetings, and pre-start meetings.

3.3 Continual Improvement

In addition to specifying the day-to-day environmental management of a project, each EMP details activities to be performed to deliver continual improvement in environmental performance.

The CPB continual improvement process is achieved via the following steps:

- Undertaking comprehensive planning activities to assess environmental risks and design effective controls
- Identifying design and construction technique refinements to reduce risk and improve project environmental management outcomes, as well as
- Implementing audit and review of both project specific EMPs and CPB Contractors' Environmental Management System.

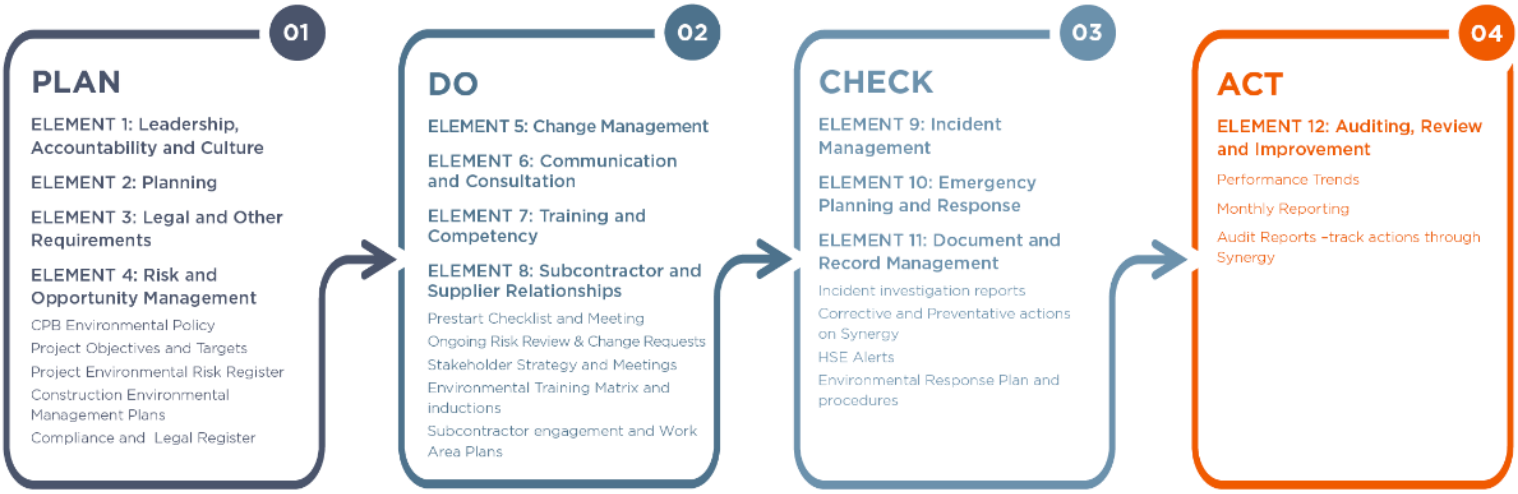


Figure 3-2 Continual improvement process

4. Potentially Significant Environmental Aspects and Impacts

The term 'hazard' is used throughout this EMP and has the same meaning as 'aspect' for the purposes of implementing ISO14001 requirements.

Potentially Significant Environmental Aspects (SEAs) are identified as follows:

1. Aspects documented as having a significant environmental impact within environmental assessment reports (including social/ stakeholder impacts), or contractual documents,
2. Aspects that represent a significant environmental legal compliance risk;
3. Aspects identified having *adverse material impact* or rated as either having a High, Very High or Extreme 'Risk Level' based on the Consequence and Likelihood criteria within the CPB Risk Rating Matrices (or project specific similar risk rating tool);
4. The aspects that have or can have one or more significant beneficial impacts where defined as either having a High or Very High 'Benefit Rating' based on the Sustainability Impact Assessment Criteria within the CPB Sustainability and Innovation Opportunity Register (or project specific similar).

SEAs will attract a higher level of focus through design development and construction work planning detailed in Element 3 and 4 of Part B of this Plan.

Sub-plans are developed for:

- Significant Environmental Aspects
- Potential environmental impacts that require targeted management to avoid and minimise impacts
- As required by Approvals or contractual obligations

Each of the Sub-plans listed below will be regularly reviewed during construction as the project aspects and impacts are reviewed.

Table 4-1 Environmental Aspects, Impacts and corresponding Sub-plan/s

Environmental Aspect (or hazard)	Significant Environmental Aspect (Yes/No)	Associated Potential Impacts	Environmental Sub-plans (Part C)
Impact to flora and/or fauna	Yes	Loss of or harm to flora or fauna through impact, habitat loss and incidents	Flora and Fauna Management Sub Plan
Iimpact to Heritage	No	Discovery and/or damage to previously unidentified Heritage items/areas	Heritage Management Sub Plan
Impact to local water quality	Yes	Degradation of water quality, harm to flora and fauna through spills and pollution events	Soil and Water Management Sub Plan
Pollution of air (dust) / odour/ emissions	Yes	Aesthetic and health related impacts from emissions and construction dust	Air quality Management Plan
Acoustic impacts to surrounding locations/ sleep disturbance	Yes	Aesthetic impacts, sleep deprivation from construction activity	Noise and Vibration Sub Plan
Structural / cosmetic damage to property through vibration	Yes	Aesthetic and/or structural concerns, damage to structures from vibratory construction activity	Noise and Vibration Sub Plan
Disturbance of contaminated material	Yes	Health related impacts due to unexpected discovery of contamination, poor management during construction and	Contamination Sub-Plan

Environmental Aspect (or hazard)	Significant Environmental Aspect (Yes/No)	Associated Potential Impacts	Environmental Sub-plans (Part C)
		inappropriate waste management and disposal	
Impacts to hospital access / traffic	No	Disruption to emergency and hospital services, congestion, loss of parking through construction impacting access or travel routes	Construction Traffic and Pedestrian Management Sub Plan
Flooding impacts	No	Inundation, pollution and loss of access through altered hydrology	Emergency Response Plan
Illegal dumping / waste disposal	Yes	Health related impacts through inappropriate waste management and disposal	Waste and Energy Management Sub Plan
Sustainability and energy consumption impacts	No	Generational impacts, resource consumption, waste generation and improper practices in resource usage	Energy Management Sub Plan

The above terminology is consistent with ISO 14001 definitions, see below:

Environmental aspect:

Element of an organisation's (3.1.4) activities or products or services that interacts or can interact with the environment (3.2.1)

Note 1: An environmental aspect can cause (an) environmental impact(s) (3.2.4). A significant environmental aspect is one that has or can have one or more significant environmental impact(s).

Note 2: Significant environmental aspects are determined by the organization applying one or more criteria.

Environmental impact:

Change to the environment (3.2.1), whether adverse or beneficial, wholly or partially resulting from an organization's (3.1.4) environmental aspects (3.2.2)

5. Elements and Expectations

The Environmental Management Plan is structured using a common set of Elements and Expectations:

Element	Key aspects for managing this function on the Project
Expectation	The high-level outcomes achieved as part of each Element

This two-level hierarchy provides a consistent structure that is applied across all Management Plans on the Project. Those Elements are:

- Element 1: Leadership, Accountability and Culture
- Element 2: Planning
- Element 3: Legal and Other Requirements
- Element 4: Risk and Opportunity Management
- Element 5: Change Management
- Element 6: Communication and Consultation
- Element 7: Training and Competency
- Element 8: Subcontractor Relationships
- Element 9: Incident Management
- Element 10: Emergency Planning and Response
- Element 11: Document and Record Management
- Element 12: Auditing, Review and Improvement

Element 1: Leadership, Accountability and Culture

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
1.1 Environmental leadership and commitment are demonstrated through participation in environmental management	**Environment Policy** CPB Contractors has developed an Environment Policy (**Error! R eference source not found.**), to lead the creation of a consultative and proactive culture that ensures environmental compliance as a driver of work behaviours. This will be communicated in project inductions and prominently displayed at the Main Site Office. All personnel in leadership roles on the Project will participate in environmental management activities, including toolbox talks, and raising any environmental issues observed during inspections and incident reviews.	**Project Director** **Project Manager** Project Environmental Representative Relevant functional managers	Environment policy displayed and communicated in site inductions
1.2 Environmental accountabilities, roles and responsibilities for managers, staff, employees and subcontractors are clearly defined, documented and communicated	**Roles and Responsibilities** Environmental responsibilities are included in all relevant Position Descriptions. Roles that carry specific environmental accountabilities (e.g. those that supervise or manage work with specific environmental risks) will contain more detailed environmental content. The environmental responsibilities contained in Position Descriptions are communicated to each person by their immediate Supervisor upon commencing in their role.	**HR Manager** Project Environmental Representative Line managers	Position Descriptions
1.3 Environmental leadership and commitment are demonstrated through measurable participation in environmental management	**Participation and Measurement** All personnel in leadership roles on the Project participate in environmental management activities, including observations, incident reviews and HSE committee meetings. Project management will regularly review environmental performance against Project KPIs, raise corrective actions to maintain or improve environmental performance as necessary. Pertinent environmental matters shall be addressed at communication forums.	**Project Director** **Project Manager** Line managers Functional managers Supervisory staff Project Environmental Representative	Measurement system output to include: Observation records, Incident reviews, HSE Committee meeting attendance (minutes), delivering toolbox talks Monthly reports

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
1.4 Environmental expectations are clearly defined with appropriate reward and disciplinary processes in place.	**Project Environmental Requirements** Project environmental requirements are documented and communicated to Project personnel through multiple processes (see Part A – Section 3).	**Project Director** **Project Manager** Project Environmental Representative	SEPs CAPs Work Packs SWMS Pre-start Meetings
	Performance Targets Environmental performance targets for the Project have been identified in Section 2.4 of this document. These include lead and lag Key Performance Indications (KPI). In addition to project specific KPIs, project will report on all applicable CPB Contractors Corporate and Business Unit KPIs.	**Project Director** **Project Manager** Project Environmental Representative	Monthly reports
	Managing Personal Performance Environmental performance goals will be set and reviewed for individuals with environmental leadership roles (refer to Element 1.2) during the performance and development review process. Any person who breaches the project's environmental requirements will be managed in accordance with CPB Contractors SHE Culture and Just Culture Frameworks.	**Project Director** **Project Manager** Line Managers	Performance and development reviews

Element 2: Planning

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
2.1 Adequate resources are provided to effectively implement the EMP	**Resources** The Project budget includes enough allowances to implement the EMP, including people, technical environmental expertise, equipment, materials, training, plant, and infrastructure. The Project Environmental Representative is consulted in setting and revising (forecasting) the Project budget.	**Project Director** **Project Manager** Commercial Manager Project Environmental Representative HR Manager	Project budget Project forecasts Organisational structure Training matrix
	Environmental Monitoring Planning The Project Environmental Representative has developed the Environmental Monitoring Schedule(s) which identifies: ▪ Equipment and maintenance requirements (including calibration) ▪ Personnel required to implement the schedule	**Project Environmental Representative**	Monitoring, Inspections, Reporting, Review, Audit (MIRRA) Schedule Environmental Sub-plans
2.2 Business systems are defined and established	**Define and set up IT Systems** Applications required to manage environment on the Project are defined and established prior to works commencing. Systems to be used include: ▪ **Synergy** - Reporting and recording all environmental incidents, audit results and corrective actions ▪ **Synergy or SCS Forms** – Record all water use and waste generation data ▪ **JD Edwards** (NGER module) to capture energy use and emissions ▪ **TeamBinder/ Aconex** – Records and documents management and archiving ▪ **Environmental Monitoring Spreadsheets** – To capture and review all environmental monitoring data.	**Project Environmental Representative** Commercial Manager	Applicable business systems
2.3 Identify Significant Environmental Aspects	**Identify Significant Environmental Aspects (SEA)** Significant Environmental Aspects (SEAs) are identified as described in Section 4.	**Project Environmental Rep**	Significant Environmental Aspects and Sub-plans

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
2.4 Environmental Sub-plans are prepared and maintained	**Environmental Sub-plans** Environmental Sub-plans (Part C) are reviewed for on-going relevance and accuracy by the Project Environmental Representative. The frequency of review is triggered by either incident history, substantial changes to the project, including contract variations, and/or management review requirements. Reviews are documented and records retained in the project document management system. Sub-plans are developed for: ▪ Potential Significant Environmental Aspects ▪ Aspects that require targeted environmental management as per Approval or contractual obligations	**Project Environmental Rep**	Reviews of SEA and Sub-plans

Element 3: Legal and Other Requirements

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
3.1 Relevant legal, contractual and other requirements are identified and maintained in a legal and other obligations register	**Identifying Environmental Obligations** The Project Environmental Representative has reviewed the Contract, construction methodology and program and identified all: ▪ Contractual conditions specific to environmental management. ▪ Regulatory approvals required and associated conditions. ▪ Local, state and federal laws using CPB Contractors' online subscription to EnviroLaw (Enviro Essentials). ▪ Targets and objectives in CPB Contractors Business Unit or whole of CPB Contractors Business Plans. The sources and details, and means of compliance with the above, are captured within an Environmental Obligations Register. Documentary evidence will be available to show that all owners of obligations have been informed of their responsibility and are able to deliver the obligation.	**Project Director** **Project Environmental Representative** Project Manager	Environmental Obligations Register(s) Project Management Plan, insert reference to relevant section
3.2 All necessary environmental approvals are obtained prior to commencing relevant works and surrendered on completion	**Obtaining and Surrendering Environmental Approvals** Approvals required to deliver the project are obtained prior to the commencement of any activities relating to the scope of the approval. The timing to obtain each necessary regulatory approval is determined and included within the Project program linked to relevant activities. Details of all approvals and licenses (including applications and decision notices where appropriate) are maintained in the Project's Environmental Obligations Register and Section **Error! Reference source not found.**). All regulatory approvals will be surrendered according to the requirements of the approval or, where not stated, as soon as practical following the completion of the activity to which the approval relates.	**Project Director** **Project Environmental Representative** Engineers Project Manager	Environmental approvals in program Environmental approval documentation Approval and license conditions entered into Project's Environmental Obligations Register
3.3 Work is planned and executed to ensure compliance	**Planning for Compliance** The Project Environmental Representative is consulted upon commencement of development of all Construction Area Plans (CAPs) and Work Packs, and throughout their development. All controls necessary to ensure compliance are included in the CAPs and Work Packs and in the Environmental Sub-plans (Part C of this Plan). CAP's and Work Packs should include Site Environmental Plans that clearly show the controls to be implemented.	**Construction Manager** Supervisors Engineers Project Environmental Representative Engineering Manager	Reviewed CAPs and Work Packs by Project Environmental Rep Include relevant Permits, SEPs Update project program

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	The Project program is updated to include new approvals determined to be necessary following the review of work plans. CAPs and Work Packs are reviewed by the Project Environmental Representative prior to the commencement of works described in their scope. **Hours of Work** Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays No work may be carried out on Sundays or public holidays, without seeking the permission and approval from the DPE or as instructed by the DPE. Activities may be undertaken outside of the hours identified above if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works. Notification of such activities must be given to affected residents before undertaking the activities or as soon as is practical afterwards. Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday. **External Lighting** External lighting in compliance with AS 4282-2019- Lighting will be installed to meet the minimum standard and control obtrusive effects. Lighting will provide wide and even spread of illumination but will also meet operational requirements. External lighting will be installed so as to not result in any light spill or other lighting related impacts on surrounding locality		

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	Coordination with Nominated Stakeholders CPB will coordinate with PCC prior to the approval of Barber Avenue works, whilst TfNSW is not impacted on the site project works. CPB to provide evidence of consultation with PCC when undertaken.		
3.4 Inspections, observations and monitoring are performed	**Implementing Controls** Controls required to achieve compliance, as detailed in the CAPs and Work Packs, will be implemented before relevant works commence.	**Supervisors** Engineers Project Environmental Representative	Engineered (physical) and administrative controls (e.g. procedures, forms, training) in place
	Inspections and Observations Controls are to be inspected regularly to ensure their ongoing suitability and effectiveness. Inspections and observations are planned and conducted according to the requirements of the Conduct Task Observations and Workplace Inspections procedure. Inspections undertaken by the Project Environmental Representative (or delegate) are scheduled using the MIRRA schedule (Appendix D). The outcomes of inspections are captured on the inspection checklists. Corrective actions are raised, tracked and closed out in the Synergy – Action Plan Module or via the project site inspection records.	**Supervisors** Engineers Project Environmental Representative	Observation records Inspection schedules Inspection checklists Corrective actions in Synergy – Action Plan Module or inspection records MIRRA Schedule
	Environmental Monitoring Environmental monitoring is carried out in accordance with the Approval, contractual and legislative requirements, and to provide early indication of potential adverse impacts to the environment or community. Environmental monitoring results are interpreted to identify actual and potential non-compliances and events that may result in nuisance, environmental harm, and unacceptable loss of amenity or community complaints. Corrective actions are taken immediately or are raised and managed using Synergy	**Project Environmental Representative**	MIRRA Schedule Monitoring records Calibration records Corrective actions Environmental Sub-plans
3.5 All non-compliances are recorded and corrective/preventative actions implemented.	**Reporting Non-Compliances** All non-compliances are recorded and reported as incidents in the Synergy. This includes events involving an action being taken against the project by a regulator.	**Project Environmental Representative** All personnel	Incident reports

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the identification of any non-compliance. The Certifying Authority must also notify the Department in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance. The 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. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.		
3.6 All energy and greenhouse data are collected and entered into JDE	**Greenhouse and Energy** 'Operational Control' identifies which companies need to report in accordance with the National Greenhouse and Energy Reporting Act 2007 and is determined as part of the CPB project start-up process. A copy of the operational control determination assessment is obtained by the Project Environmental Representative from the CPB Group Environment Team, completed with project specific details and returned to the Group Environment Team. All CPB project teams and teams working within a joint venture will report on energy consumption monthly, regardless of which company has operational control. Where subcontractors provide their own fuel for use on a project, they will provide a monthly fuel consumption report to the project commercial team along with their claim. This data is then entered into the JDE NGER Module. Subcontractor reporting is tracked by the Commercial Team. If a project is not using CPB JDE, both invoiced and contractor energy use will be collated and entered into Synergy monthly by the Project Environmental Representative. All energy (fuels, oils, greases, gases, electricity, solvents) purchased by CPB Contractors and processed through JDE are captured centrally at the Group level.	**Commercial Manager** **Project Director** Project Manager Project Environmental Representative	NGERS operational control assessment NGER subcontractor register NGER data checklist Completed NGER subcontractor records Monthly HSE Statistical reports
3.7 Personnel on the site have access to current versions of relevant	**Updates to Legislation, Standards and Codes of Practice** Access to all relevant legislation will be available to personnel via EnviroLaw or other online resources (e.g. state or Commonwealth government websites or www.austlii.edu.au).	**Business Unit Environmental Representative**	Updates distributed Relevant documents updated

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
legislation, standards and codes of practice	Updates to legislation, standards and codes of practice will be reviewed to determine relevance. Work practices, the Environmental Sub-Plans attached to this EMP, and compliance monitoring and reporting program will be altered where appropriate to ensure compliance and all affected personnel informed in a timely manner. Regulatory approvals will be obtained or amended as necessary, work practices altered to ensure compliance and all affected personnel informed in a timely manner.	**Project Environmental Representative** Commercial Manager	

Element 4: Risk and Opportunity Management

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
4.1 Systematic processes are implemented for identifying environmental risks and opportunities at all stages of the Project	**Identifying Environmental Risks and Opportunities** Environmental risks and opportunities associated with activities, products and services of the project will be identified, recorded and tracked in the Project Environmental Risk and Opportunity Register. The Environmental Risk and Opportunity Register is an excel Spreadsheet contained in the Project Management System. Any environmental risks identified as critical will also be captured and monitored via the Project Risk Register contained in ARM. Environmental risks and opportunities are considered during all subsequent project risk assessments as per the Project Management Plan. This includes: ▪ The Principal Risk Assessment conducted at bid stage for major tangible risks. ▪ Safety/Environment-in-Design workshops conducted throughout the Project ▪ Construction Area Plan (CAP) risk assessments ▪ Work Pack risk assessments ▪ Project Prestart Meeting The Environment Representative is involved in the Principle Risk Assessment and Safety/Environment-in-Design workshops and has approval authorities for all other risk assessment types (except for START/Restart Cards) to ensure environmental risks and opportunities are adequately raised and addressed.	**Project Director** **Project Manager** Project Environmental Representative Engineering Manager Engineers Supervisors	Principal Project Risk Review Construction Area Plan Risk Reviews Work Pack Risk Assessments Project Prestart Meeting
4.2 Identified risks and opportunities are evaluated according to agreed criteria and recorded	**Analysing Environmental Risks and Opportunities** Each environmental risk and opportunity will be evaluated and assigned a rating which is determined using the consequence and likelihood criteria in the Risk Management Procedure. The influence of existing controls is considered in determining the risk rating. For each environmental risk: ▪ An owner is assigned by the Project Manager, ▪ Existing controls are recorded, including the owner of that control, and ▪ The residual risk will be evaluated. Opportunities will be assessed to determine whether they can be implemented on the project and be based on a cost-benefit business case for the opportunity.	**Project Director** **Project Manager** Risk owners Project Environmental Representative Engineers	Work Pack risk assessments Project Prestart Meeting

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	Advice is sought from the Project Environmental Representative as necessary by the project team to ensure CAP, Work Pack and SEP risk assessments are as informed and accurate as possible.		
4.3 Environmental controls appropriate to the level of risk are identified, documented and implemented	**Identifying Adequate Controls** Risks with a high, very high or extreme risk rating will be considered 'significant' and will be controlled using appropriate systems of work, including Environmental Sub-plans and project work procedure, along with available 'hard controls'[1] Refer to Section 4 for further information regarding the identification of Significant Environmental Aspects. Accountability for the implementation of each control is assigned in the respective Sub-plan and SEPs Controls are selected in consultation with the Project Environmental Representative to achieve the following, in order of preference: ▪ Eliminate the risk by not performing the relevant activity ▪ Substitute by performing the relevant activity in a way that presents a lower risk ▪ Implement physical (engineered) controls (e.g. sediment basins, check dams) ▪ Implement administrative controls (e.g. procedures, training, inspections).	**Risk owners** Project Environmental Representative **Project Director** Project Manager Project Engineers	Controls agreed (engineered or administrative)
	Implementing Controls Controls are implemented by the accountable person as specified in the Sub-plan or SEP. No activity is commenced until all relevant controls are implemented.	**Risk owners** Supervisors	Controls in place (engineered or administrative)
4.4 Feasible opportunities are implemented	**Implementing Opportunities** Opportunities identified and for which a cost benefit and/or business case has been developed, are submitted to the appropriate member of the project leadership team for approval. Once approved, accountability for implementation of the opportunity is assigned and the opportunity is implemented. Environmental and cost benefits are recorded and reported in monthly reporting.	**Project Director** **Project Manager** Opportunity Owner	Monthly reports Case studies
4.5 Identified environmental risks and	**Communications in line with Construction Planning** The environmental risks, controls and accountabilities identified are communicated to all relevant personnel. This is achieved through the	**Project Director** **Project Manager** Engineers	Pre-start meeting content

[1] Hard controls may include physical separation, concrete/ water filled barriers, sediment basins, check dams, locks, spill prevention measures.

Expectations		How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	controls are communicated to all relevant personnel	preparation and communication of the construction methodology, CAPs, Work Packs, SEPs, the conduct of Safety/Environment-in-Design workshops.	Project Environmental Representative	Records of communications and meetings CAP, Work Pack and SEP
		HSE Communications Environmental risks, controls and accountabilities are also communicated through delivery of HSE communications, including HSE Committee meetings, toolbox talks and pre-start meetings.	**Engineers** Supervisors Project Environmental Representative Project Manager Health and Safety Manager	Site induction content Toolbox talk content and attendee records Pre-start meeting content Records of communications and meetings
		Communication through Training Nominated administrative controls, including procedures and training, will be communicated through the delivery of training in their requirements. The planning and delivery of this training is provided according to the requirements of Human Resources Management Plan.	**Project Environmental Representative** HR Manager	Training schedule Training matrix Training records
4.6	Environmental risks and controls are regularly reviewed.	**Risk Review** The relevance and adequacy of environmental risks and controls identified in this EMP, the Principal Project Risk Review, CAP and Work Pack risk review/assessments are reviewed and updated according to Project Management Plan.	**Project Director** **Project Manager** Project Environmental Representative Engineers	Updated CAPs and Work Packs risk registers

Element 5: Change Management

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
5.1 Changes to planned operations that have potential environmental consequences are identified	**Identifying Change** Personnel promptly report any 'medium' or 'major' changes that could affect the environment and/or community A 'medium' or 'major' change could result from a change to design, plant (fixed and mobile), systems, personnel and work methods such that the absence of a considered review could compromise the project's ability to comply with its obligations and/or result in an inadequate range of controls which could lead to an incident or result in community nuisance. A 'medium' change is one which includes permanent changes to Work Pack methodology or work conditions. A 'major' change is one which is site-wide or requires a revision of CAP's.	**Project Director** **Project Manager** Project Environmental Representative Engineering Manager Engineers Supervisors	Change management process included in Project Induction and/or Training matrix Change Management Training records Change Requests
5.2 Risks associated with identified changes are assessed and controlled before changes are implemented	**Risks Associated with Change** All proposed changes are documented, including the assessment of risks relating to the change. Key personnel affected by the change are involved in the risk assessment. All changes are requested or sponsored by a Supervisor or Manager, who then becomes the change owner. Input from environmental personnel is sought as necessary. The approach to risk assessment and the implementation of controls will follow the requirements of Elements 2, 3 and 4 of the EMP.	**Project Director** **Project Manager** Change owner Supervisors Project Environmental Representative	Change Requests Revised risk assessments
5.3 All changes with environmental consequences are authorised before they are implemented	**Changes Approved** All change requests are approved by the Supervisor or manager of the change owner, or as otherwise required by the project delegations, before any relevant work commences, and a record is maintained. This will include any approvals associated with revised CAPs and Work Packs by the Project Environmental Representative.	**Project Director** **Project Manager** Construction Manager Engineering Manager Project Environmental Representative	Change Requests Additional environmental assessment (if triggered)
5.4 Controls associated with change are communicated to all affected personnel	**Communication of Change** Affected personnel will be consulted and understand the effects of change before the relevant works commence. This is achieved through toolbox talks, daily pre-start meeting, HSE committees or forums arranged to specifically address changes.	**Change Owner** Supervisors	Toolbox talk material Pre-start meetings Attendance records Meeting minutes

Element 6: Communication and Consultation

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
6.1 We will create a culture of collaboration across all functional disciplines	**Internal Culture of Collaboration** The Project team will work together collaboratively to formulate integrated project specific management systems. Interdisciplinary meetings will be held on key issues to promote collaboration.	**Project Director** **Project Manager** Discipline leads	Integrated project specific management systems
6.2 External Environmental stakeholders are identified	**Identifying External Stakeholders** A comprehensive stakeholder analysis will be performed to identify external stakeholders and their interests in the environmental management of the Project. This will include community members and others who could be affected by the Project works, as well as government and environmental lobby groups. The Environment Representative will be involved in the analysis process. The Community Communication Strategy, as approved by the Planning Secretary, must be implemented for a minimum of 12 months following the completion of construction.	**NSW Health Infrastructure responsibility**	Stakeholder register or database Stakeholder Analysis
6.3 Relationships with external stakeholders are effectively managed	**Managing Relationships** Activities performed to effectively manage relationships with external stakeholders include: ▪ Identifying environmental risks that relate to stakeholder interests by considering the impacts to stakeholders (documented in Environmental Risk Register) ▪ Determining suitable controls and activities to mitigate risks (general controls and activities documented in Environmental Risk Register, details in Environmental Sub-Plans, CAPs, and Work Packs). ▪ Performing inspections, audits, stakeholder engagement and monitoring activities to assess the effectiveness of controls Actively engaging stakeholders through open communication and involvement. A site notice(s): (a) must be prominently displayed at the boundaries of the site for the purposes of informing the public of project details including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer.	**Project Environmental Representative** **Project Director** Project Manager	Environmental Risk Register Risk assessments in CAPs, Work Packs, Environmental Sub-Plans and Procedures Audit reports Monitoring results Communications material Forums and opportunities for stakeholder engagement

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	(b) is to satisfy all but not be limited to, the following requirements: (i) minimum dimensions of the notice must measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30-point type size; (ii) the notice is to be durable and weatherproof and is to be displayed throughout the works period; (iii) the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice; and (iv) the notice(s) is to be mounted at eye level on the perimeter hoardings/fencing and is to state that unauthorised entry to the site is not permitted. A Community Communication Strategy must be prepared to provide mechanisms to facilitate communication between CPB Contractors, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction. The Community Communication Strategy must: (a) identify people to be consulted during the design and construction phases; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; (d) set out procedures and mechanisms: (i) through which the community can discuss or provide feedback (ii) through which CPB Contractors will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation.		

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	The Community Communication Strategy must be submitted to the Planning Secretary for approval no later than two weeks before the commencement of any work. Work for the purposes of the development must not commence until the Community Communication Strategy has been approved by the Planning Secretary, or within another timeframe agreed with the Planning Secretary.		
6.4 Internal consultative forums are established with regular meetings scheduled, conducted, documented and communicated	**Consultative Forums** A schedule of communication forums will be developed which includes: ▪ Managers' meetings that are to address environmental matters at least monthly; ▪ Environmental Toolbox Talks at least monthly; and, ▪ Pre-start meetings prior to commencing a shift. The Project Manager will establish appropriate environmental interfaces with the Client and regulatory bodies. Records will be kept of all HSE communication activities (e.g. attendance records). The effectiveness of the meeting outcomes will be reviewed as required.	**Project Director** **Project Manager** Project Environmental Representative H&S Manager	Minutes of meetings Toolbox Talks Pre-Start meetings Attendance records
	Actions from Consultative Forums Actions arising from consultative forums are assigned and communicated to a responsible person and confirmed as being completed. The Project will identify, track and complete environmental related actions using Synergy – Action Plans Module.	**Community & Stakeholder Liaison** Project Environmental Representative	Synergy – Action Plans Module
	HSE Signs and Notice Boards Dedicated HSE notice boards will be prominently located and maintained with current environmental information.	**Project Environmental Representative**	Signs and notice boards installed with current environmental content
6.5 Environmental complaints and enquiries are recorded and responded to appropriately	**Responding to Complaints and Enquiries** All environmental related complaints will be classified according to the Incident Classification Matrix and recorded in Synergy. Complaints are treated as an incident and managed according to Element 9 of the EMP. Corrective actions are agreed and implemented, with accountabilities and time frames assigned. The complainant or enquirer is notified of the intended Project response once approved by the Project Manager.	**Community & Stakeholder Manager** Project Environmental Representative **Project Director** Project Manager	Incident records Records of communications

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	Changes to Environmental Monitoring Environmental monitoring programs will be reviewed to address matters raised through valid complaints and consultations with stakeholders. Amendments to the monitoring program will be adequate to allow early identification of conditions that are likely to result in further complaints and/or exceedances. Data will be analysed to identify actual and potential impacts to the community, and corrective actions implemented.	**Project Environmental Representative** Community & Stakeholder Manager	Monitoring schedule Monitoring records Corrective actions in Synergy
	Client and Internal Notifications The Business Unit Environment Manager and Corporate Communications Manager are notified of complaints that have or are likely to generate media interest. The client is notified according to the conditions outlined in the Contract.	**Project Director** **Project Manager**	Record of communication
6.6 The effectiveness of internal and external stakeholder engagement is evaluated and improved.	**Evaluation of Internal and External Communications** The effectiveness of internal and external communication, including Client and key stakeholder consultation activities will be reviewed as required and within six months of construction commencement. The Project Environmental Representative participates in these reviews, which are led by the Project Manager and include the Community and Stakeholder Manager and Health and Safety Manager. CPB Contractor environmental performance reports issued by the Client or other feedback provided is reviewed as part of this evaluation process.	**Project Director** **Project Manager** Community & Stakeholder Manager Project Environmental Representative H&S Manager	Meeting minutes
6.7 Share knowledge from lessons learnt internally and consider the need for knowledge sharing with stakeholders and the construction industry	**Knowledge Sharing** The Project Manager will ensure knowledge sharing internally in order to ensure that lessons learnt are implemented across worksites. The need for broader knowledge sharing with key stakeholders will be considered in consultation with corporate representatives to ensure contribution to knowledge and capacity building and assist in a larger market shift towards improved environmental performance.	**Project Director** **Project Manager** Project Environmental Representative	Tool box talks Environmental alerts Conference presentations

Element 7: Training and Competency

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
7.1 All personnel have completed an induction containing relevant environmental information before they are authorised to work on the Project	**Inductions** All personnel, subcontractors and visitors will undergo an induction before commencing work on-site. The induction addresses general and Project-specific environmental issues, including: ▪ CPB Contractors' environmental policy ▪ How the EMP will be implemented on-site ▪ High-risk environmental activities on the Project and their controls ▪ What to do in the event of an environmental incident. An assessment will be conducted upon completion of the induction. Induction materials are reviewed at least annually and amended to reflect changes to Project environmental risks, the status of community relations and the occurrence of incidents.	**Project Environmental Representative** HR Manager Health and Safety Manager	Induction materials Training attendance records Completed induction assessments
7.2 A training matrix is developed and documented	**Identifying Training Needs** Environmental training needs are identified and documented within the Project's training matrix within three months of project commencement. In populating the training matrix, the environmental training requirements for each role are addressed, including competency, needs and capability. The Project Environmental Representative will contribute to the development of the training matrix. At a minimum environmental training (and/or induction training) will include: 1. Project specific Significant Environment Aspects and associated controls 2. Change management training - to identify changes and apply change management processes. This includes all supervisory staff being informed of the need to have changes approved prior to commencing relevant works. 3. Subcontractor training and competency responsibilities. This will also be included in subcontractor agreements. 4. Environmental emergency preparedness 5. Incident response and notification	**Environment Representative** HR Manager	Identify and Manage Project Training Project Training Plan Template Project Training Startup Checklist Training matrix Performance and Development management plans Subcontractor agreements Subcontractor Start-Up Meeting minutes
	Scheduling Training Needs	**HR Manager**	Training schedule Training records

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	A project training schedule will be developed to plan the delivery of environmental training needs identified in the training matrix. Refresher training intervals will also be stated where applicable.	Project Environmental Representative	
7.3 Personnel are trained and assessed according to the training plan	**Provide Training** All resources to deliver the environmental training in the schedule, including personnel, equipment, funding and materials, will be allowed for in the Project budget. Subcontractors will undergo all necessary environmental training including any required by the Project. The required training will be determined by reviewing the training matrix relative to the scope of work and roles being filled or supplied by the subcontractor.	**Project Director** **Project Manager** Project Environmental Representative	Project budget Training records including Subcontractor records
	Training Evaluation and Review Training assessments and evaluation forms will be used to assess the effectiveness of training. Training evaluation and feedback will be reviewed and used to improve the quality of environmental training delivered on the Project. The training matrix and schedule will be completely reviewed at least annually or prior to the commencement of major new tasks.	**HR Manager** Project Environmental Representative	Training evaluation forms Training matrix
7.4 Training records are maintained and accessible to relevant personnel.	**Training Records** Records of all training activities, including inductions, will be maintained. Records will include the name and role of the attendee, the name of the course and, where applicable, reference to the document-controlled version of the material presented, and a copy of the assessment completed.	**HR Manager** Project Environmental Representative	Training records

Element 8: Subcontractor Relationships

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
8.1 Selection processes ensure that subcontractors meet CPB Contractors' minimum environmental requirements	**Subcontractor Selection and Engagement** The Project Environmental Representative will be consulted regarding minimum sub-contractor environmental management capabilities and sub-contractor suitability relevant to project obligations. Subcontractors will be made aware of their responsibilities when undertaking works in accordance with CPB contract requirements and associated project obligations during the tender process and again at project start-up meetings.	**Commercial Manager** Engineers Project Environmental Representative	Completed Supplier Prequalification Questionnaires Subcontractor Agreements
8.2 Planning requirements of all subcontractor work scopes are completed and communicated prior to commencing work	**Identify, Complete and Communicate Planning Requirements and Documentation** The scope of work to be performed by each subcontractor is reviewed to determine whether it includes works for which project planning and environmental risk assessments have been completed. If so, the subcontractor is formally informed of all relevant risks and existing project documents, systems and procedures to be followed prior to commencing works (in addition to having been informed of these during the tendering process). These may include the contents of the construction methodology, CAPs, Work Packs, SEPs, and Environmental Sub-Plans in this EMP. If the scope of works includes activities not already addressed in Project planning and risk assessment, then an appropriate risk assessment is performed and either existing documentation is revised, or new documentation produced. The Project Environmental Representative should review this new documentation to ensure it meets project requirements. In either case, the subcontractor must be formally informed of all requirements prior to commencing works.	**Engineers** Project Environmental Representative Commercial Manager	Construction Area Plans (CAPs) Work Packs SEPs Records of subcontractor notification
8.3 Compliance requirements for high risk environmental activities are identified and enforced	**Compliance requirements** For high, very high or extreme environmental risk activities, the Project Environmental Representative will review the subcontractor's scope of works with the supervising Engineer and: ▪ Identify any new issues relevant to the subcontractor's scope of works; ▪ Identify any additional compliance requirement not captured; ▪ Identify necessary approvals not already in place and obtain those approvals prior to any works commencing;	**Engineers** Project Environmental Representative Commercial Manager	Records of subcontractor notification

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	▪ Update the relevant Environmental Sub-plans, SEPs, and Environmental Obligations Register with details new approvals and their conditions. The subcontractor will be informed of the requirement to provide all relevant data relating to their works as per the National Greenhouse and Energy Reporting Act 2007 (Cth).		
8.4 Subcontractor documentation is submitted and reviewed to meet Project requirements	**Documentation Preparation and Review** The subcontractor will provide CPB Contractors with all required environmental documentation prior to commencing work on the Project as described in the executed agreement, including any requirement to produce an Environmental Management Plan. Any further requirements will be agreed by the Commercial Manager and the Project Environmental Representative.	**Project Environmental Representative** Engineer Commercial Manager	Subcontractor environmental documentation
8.5 Changes to the scope of work are managed as a Project change	**Manage Changes/ Variations** Changes and variations to subcontractor scopes of work will be assessed as a change according to the requirements of Element 5 of the EMP. Documentation will be amended accordingly.	**Commercial Manager** Engineers	Change Requests
8.6 Subcontractors actively participate in environmental management and training on the Project	**Subcontractor Environmental Participation** Subcontractors will participate in HSE communication forums and monitoring activities, as a minimum, including: ▪ Project induction; ▪ Scheduled HSE management meetings, toolbox talks, pre-start meetings, HSE committees (as required); ▪ HSE observations, inspections and audits; ▪ Incident investigations (as required); ▪ Development or review of safe work systems and SEPs (as required).	**Commercial Manager** Project Environmental Representative Subcontractors Engineers	Attendance records Monitoring records
8.7 Subcontractors are reviewed to assess their performance and compliance with our minimum environmental requirements.	**Subcontractor Audits and Reviews** Subcontractors will be regularly inspected and observed for environmental performance as per Element 3.4 of this EMP.	**Project Environmental Representative** Engineers Supervisors	Audit reports Inspection and monitoring records

Element 9: Incident Management

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
9.1 All incidents are followed by appropriate response and notification	**Incident Response** The immediate response to all incidents is to make the area safe and undertake measures to prevent further environmental harm. An assessment will be made in consultation with the Project Environmental Representative to ensure that responses do not result in further harm. **Initial Incident Notification** The Project Manager and Project Environmental Representative are to be notified immediately of incidents classified as: ▪ Class 1A and Class 1P ▪ Class 2A and Class 2P For these incidents the Project Manager will immediately notify the Business Unit General Manager and the Business Unit Environment Manager. The Project Manager will also notify the Business Unit General Manager of the need to activate the Project's Emergency Response Procedure and the Group Crisis Management Plan if necessary. The Project Environmental Representative is also to be notified of all other Actual or Potential Class 3 incidents and Near Hit events. **Client Notifications** The client is notified of all environmental incidents as per the agreed contractual arrangements. Environmental incidents will be reported to regulators in accordance with the requirements of local, state and federal government regulations. **Regulatory Notifications** Environmental incidents will be reported to regulators in accordance with the requirements of local, state and federal government regulations by the Project Environmental Representative or delegate. Incidents as defined under the Planning Approval are to be notified immediately by the Client to the Planning Secretary (DPE) in accordance with CoA A25. A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance in accordance with CoA A29. The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident.	**Project Director** **Project Manager** Project Environmental Representative Community & Stakeholder Manager Engineers Supervisors	Records of incident notifications

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	A written incident notification addressing the requirements set out below must be emailed to the Department at compliance@planning.nsw.gov.au within seven days of becoming aware of an incident. Notification is required to be given under this condition even if it is subsequently considered that an incident has not occurred. 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. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, a detailed report on the incident addressing all requirements below is to be provided to the Planning Secretary and relevant authorities, and such further reports as may be requested. 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; c. 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. **Preserve the Incident Scene**		

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	Scenes of environmental Level 1 and 2 incidents and PL1's is to be preserved until the incident investigation team has collected relevant data and evidence (see below).		
9.2 All incidents are entered and managed in Synergy	**Incident Classification and Reporting** All environmental incidents, including community complaints that as a result of an environmental incident or breach, will be reported in Synergy within three calendar days. Root causes will be identified and recorded in Synergy for all actual Class 1 and 2 incidents (and optionally for Class 3 incidents). All statutory notices received from regulators, including penalty notices and fines, will be entered as Regulatory Actions within the Notice of Violations sub form in Synergy upon receipt. All Notice of Violations are also recorded as Class 2 (or above) incidents.	**Project Environmental Representative** **Project Director** Project Manager	Incident records Root cause coding Regulatory Action (if applicable)
9.3 Incident investigations are conducted appropriate to the type of incident	**Project Incident Investigations** The level of investigation needed will depend on the incident classification. Corrective actions, including those required to help prevent future incident occurrences, are a key outcome of incident investigations. Incident investigation reports are to be uploaded to Synergy. **Statutory Authority Investigations** Before any staff member is questioned by officers of a statutory authority or in the case of regulator requests for further information, they are to consult the Project Manager and Business Unit Environment Manager to determine if Legal Counsel assistance is needed. Regulatory inspectors will be given appropriate assistance during their own investigations.	**Project Director** **Project Manager** Project Environmental Representative Supervisors Engineers	Incident investigation reports
9.4 All personnel conducting incident investigations are trained to competently perform the task	**Incident Investigation Teams Competent and Trained** The selection of the investigation team will be up to the Project Manager and will depend upon the severity of the incident, and the availability of experienced personnel. However, the investigation team does need to have a mix of both Operational and HSE Staff. The following should be considered when selecting an investigation team: ▪ Statutory requirements; ▪ CPB Contractors Corporate requirements; ▪ Technical specialists with an understanding of the work process;	**Project Director** **Project Manager**	

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	▪ Administrative Support; ▪ Mix of skills and experience; ▪ Potential conflict of interest for any proposed member.		
9.5 Corrective and preventive actions are taken after incidents and lessons are shared with other projects	Following an incident, corrective and preventive actions will be identified, assigned to the appropriate person/s and closed out according to set time frames. Time frames are set to ensure damage incurred is rectified and any chance of recurrence is eliminated as soon as practicable. Synergy will be used to assign and track corrective actions. All corrective actions will include reference to the relevant incident record for ease of tracking.	**Project Director** **Project Manager** Project Environmental Representative	Corrective action records on Synergy
	HSE Alerts/Lessons Learnt HSE Alerts or Lessons Learnt will be submitted for all Class 1 and 2 incidents to the Project Manager, Business Unit Environment Manager and Group Manager, Environment for distribution outside of the project team. HSE Alerts or Lessons Learnt will also be raised for all other incident types at the discretion of the Project Environmental Representative, Project Manager or Business Unit Environment Manager.	**Project Environmental Representative** **Project Director** Project Manager	HSE Alerts/ Lessons Learnt
9.6 Repeat incidents are regularly reviewed by the project management team	Each month the Project Environmental Representative will, as a minimum, identify trends in incidents (as a minimum, all Class 1 and 2 actual and potential incidents) and trends in root causes to suggest the nature of preventative actions which are warranted. The Project Manager will approve actions to address incident occurrences and incident and root cause trends. Actions will be managed using Synergy.	**Project Environmental Representative** **Project Director** Project Manager	Monthly project reports Corrective actions

Element 10: Emergency Planning and Response

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
10.1 Potential emergencies are identified using a formal risk assessment process	**Identifying Potential Emergencies** Risk assessments conducted in accordance with Element 4 of the EMP are used to identify potential emergencies on the Project. Activities found to have an environmental consequence of 4 or 5 as per the definitions for environmental consequence contained within the CPB Contractors Risk Management Protocol will be considered potential emergencies.	**Project Director** **Project Manager** Project Environmental Representative	Environmental Risk Register Principal Project Risk Review CAP Risk Review Work Pack Risk Assessment
10.2 Emergency response plans and procedures are developed and regularly reviewed	**Emergency Response Plan** An Emergency Response Plan that addresses all identified potential environmental emergencies with specific emergency procedures for each different potential emergency will be developed. The plan will address or include the following: ▪ Nominated and trained emergency coordinator and emergency wardens ▪ Explanation of communications to be performed during an emergency ▪ Explanation of what a crisis is as compared to an emergency and what to do in the event of a crisis ▪ The details of emergency services contacts ▪ Emergency assembly locations ▪ A detailed location map showing the site in relation to local public roads ▪ A detailed site layout diagram ▪ Information about personnel and facilities available to help emergency services ▪ Specific emergency procedures for each potential emergency identified that aim to protect human health and environmental values, including assessment of resources required to respond to that emergency ▪ Post-emergency actions. The Emergency Response Plan will be updated at least annually or when there are significant changes to project activities or in response to revised and new risk assessments..	**Project Director** **Project Manager** Project Environmental Representative H&S Manager	Emergency Response Plan and procedures
10.3 Adequate resources are provided to effectively implement emergency response plans and procedures	**Emergency Response Plans Adequately Resourced** Resources required to implement the Emergency Response Plan will be available on the Project and be maintained. Necessary resources include but are not limited to:	**Project Director** **Project Manager** Project Environmental Representative	Project resources for Emergency Response Plan and procedures

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	▪ An emergency coordinator and emergency wardens; ▪ Spill response kits; ▪ Firefighting equipment; ▪ Barricading; ▪ Vehicles.	H&S Manager	
10.4 Environmental emergency response drills are conducted	**Environmental Emergency Response Drills** Environmental emergency response drills will be conducted at least every six months. The emergency scenario of the drills will be rotated to avoid repetition and be relevant to the activities occurring at the time. Records will be kept of the results for all drills. Where testing and evaluation shows a deficiency in either emergency preparations or the Emergency Response Plan, appropriate corrective and preventive actions are taken and raised and managed using Synergy.	**Project Director** **Project Manager** Project Environmental Representative Health and Safety Manager	Emergency response drill records Corrective action records in Synergy
10.5 Employees, contractors and visitors are given appropriate emergency response training.	**Emergency Training** Emergency coordinators and wardens are trained to implement the emergency response plans. Specific training requirements will be identified and captured within the training matrix and will be delivered according to company procedures. **General Workforce Training and Awareness** All personnel and subcontractors will receive training to inform them of their roles and responsibilities in the event of an emergency. This training and awareness will be provided during Project induction.	**HR Manager** Project Environmental Representative Health and Safety Manager	Training matrix Training schedule Training and induction records

Element 11: Document and Record Management

Expectations	How we will meet the Expectations (minimum requirements)	Responsibilities Key Contributor	Deliverables
11.1 Current versions of all relevant documents and records are available and controlled.	The Project will ensure that all documents and records referred to and required to implement the EMP, including the plan are controlled and maintained according to CPB Contractors requirements. This includes but is not limited to all: ▪ Management plans & Procedures ▪ Knowledge and Tools ▪ Templates (e.g. audit template, training matrix) ▪ All electronic records saved in electronic databases such as Synergy, ChemAlert etc. **Document Types** The types of records to be generated on the Project that are to be stored and maintained include: ▪ Environmental monitoring results - 30 years from the date of any incident or completion of the Project, whichever is later ▪ Environmental performance metrics will be managed and stored in Synergy, including Water and Waste ▪ Records as required under the National Greenhouse and Energy Reporting Act 2007 in JDE - 7 years from the creation of the record ▪ Incident reports and corrective actions will be stored and managed using Synergy - 30 years from the creation of the record ▪ Risk registers ▪ Complaints and enquiries received - 7 years from completion of the Project ▪ Notifications received by regulators - 30 years after the completion of the project ▪ Audit reports - 7 years from completion of the Project ▪ Completed inspections and observations - 30 years from the creation of the record ▪ Waste tracking certificates - 7 years from the creation of the record ▪ Training records - 7 years from the end of the employee's employment ▪ Calibration records for monitoring equipment ▪ Monthly reports and Meeting minutes - 7 years from completion of the Project or from the date on which work was last performed on the Project ▪ HSE Alerts	**Project Environmental Representative** **Project Director** Project Manager	Controlled and maintained documents and records

Expectations	How we will meet the Expectations (minimum requirements)	Responsibilities Key Contributor	Deliverables
	Any editing and access restrictions to environmental documents and records and who has authority to dispose of nominated documents and records comprise: ▪ Project Environmental Representative to authorise the disposal of any environmental documents or records.		
11.2 Relevant documents and records will be maintained using corporate business applications and systems	Relevant environmental documents and records generated on the Project will be stored and managed using Incite with the following exceptions: ▪ Environmental monitoring data will be managed and stored using the Project drive ▪ Whole of CPB Contractors environmental performance data will be managed and stored in JDE, including Water, Waste and Energy and Greenhouse Gases ▪ Incident reports and corrective actions will be stored and managed using Synergy Risk registers will be retained in excel spreadsheet.	**Project Director** **Project Manager**	Controlled and maintained documents and records

Element 12: Auditing, Review and Improvement

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
12.1 Environmental performance trends are identified, and corrective actions are implemented as required	**Performance Trends** Environmental performance will be reviewed and reported at least monthly to identify trends. Performance will be assessed against both lead and lag measures and relative to specific targets agreed as per Section 2.4 and Expectation 1.4 of the EMP. Action plans will be developed to improve performance as required, corrective and preventative actions will be managed using the Synergy – Action Plan Module.	**Project Director** **Project Manager** Project Environmental Representative	Monthly reports Corrective & Preventative actions in Synergy – Action Plan Module
12.2 A monthly environmental report is produced and distributed	**Monthly Reporting** Monthly environment reports or dashboards will be prepared in accordance with monthly Synergy campaigns and other relevant project specific requirements. The following shall be reported: ▪ Environmental Performance Summary (e.g. key highlights/issues/innovations, incidents, and Notice of Violation updates) ▪ Analysis of performance against project, business unit and corporate environmental targets ▪ Analysis of monitoring results ▪ Complaints relating to environmental or compliance performance ▪ Details of environmental incidents including actions taken or outstanding ▪ Number and results of inspections, audits, observations and monitoring ▪ Synergy water and waste reporting ▪ Energy report	**Project Environmental Representative**	Monthly environment report
	All monthly reporting will be reviewed by the Project Manager.	**Project Manager**	Monthly Environment Report
12.3 Regular management reviews are conducted to determine the continuing suitability, adequacy and effectiveness of the	The Project team will conduct annual management reviews to assess the adequacy of the Environmental Management System. The review will consider the results of: ▪ Audits undertaken; ▪ Communication, participation and consultation; ▪ Relevant communication including complaints from external stakeholders;	**Project Director** **Project Manager** Project Leadership Group Project Environmental Representative	Management review report Actions in Synergy

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
Environmental Management	▪ The overall environmental performance of the Project including any non-conformances or actions arising from task observations; ▪ The extent to which the objectives and targets have been met; ▪ The outcomes of incident investigations and any corrective actions; ▪ Changes to legislation; ▪ Actions from previous management reviews and recommendations for improvement. In accordance with CoA A30, reviews will also be undertaken within three (3) months of: ▪ the submission of an incident report under condition CoA A26; ▪ the submission of an Independent Audit under condition CoA C40 or C42; ▪ the approval of any modification of the conditions of this consent; or ▪ the issue of a direction of the Planning Secretary under CoA A3 which requires a review Written notifications to DPE and the Certifier is required prior to the commencement of the review. If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review. The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department in writing to compliance@planning.nsw.gov.au within seven days after they identify any non-compliance.		
12.4 Audits are undertaken to ensure compliance with the requirements of the EMP	**Compliance with Environmental Management Plan** A schedule of audits and reviews will be developed and maintained, including the following: ▪ Project start Up reviews (conducted by Business Unit SHEQ Manager or delegate)	**Project Manager** Business Unit Environmental Management Representative Business Unit HSE Manager	Audit schedule Audit reports Corrective actions in Synergy

Expectations	How we will meet the Expectations (minimum requirements)	Responsible Key Contributor	Deliverables
	▪ EMS audits (conducted by Business Unit SHEQ Manager or delegate) ▪ Subcontractor audits (for subcontractors performing high risk activities) ▪ High-risk activity audits/ task observations ▪ Environmental Management Plan audits (conducted by Project Environmental Representative (or delegate), Client or independent auditor) ▪ Compliance and Legislative audits (conducted by Project Environmental Representative, Client or independent auditor) Action plans will be developed to improve performance as required. Corrective actions will be managed using Synergy.		
12.5 All audits are undertaken by suitably qualified and experienced personnel	**Auditor Competency** Persons conducting audits will be suitably experienced and qualified. A mix of general education, specific auditor training and work experience are considered in determining the suitability of an auditor. Auditors are to be approved by the Business Unit Environment Manager.	**Business Unit Environmental Management Representative**	Training and qualifications records

1. Soil and Water Sub-plan

1.1 Background / Context

There are four (4) existing stormwater catchments quadrants within the Nepean Health Campus, all of which connect into the existing PCC's stormwater network. The Stage 2 early works and main works predominantly occur within the north west catchment, which discharges to Parker Street and Barber Avenue, and overland flow is directed to Parker Street.

As part of the project, stormwater system upgrades will be undertaken, including water quality treatment devices to reduce pollutants in line with Penrith City Councils (PCC's) Water Sensitive Urban Design (WSUD) Policy water quality targets.

The Nepean Health Campus is identified as being partially flood-affected by PCC flood modelling. The EIS concludes that there are no flood impacts likely to rise from the Stage 2 redevelopment works. Any potential impacts will be addressed through mitigation measures such as the on-site detention tank, with post development peak flows expected to be less than those of the pre-development scenarios.

1.2 Scope

This Sub-plan addresses the use of water on the project and the management of potential impacts to water quality and/or quantity that may be caused by Project activities and that have the potential to adversely affect water availability, the environment and/or community.

Activities conducted on the project that have the potential to impact water quality and/or quantity are provided below.

Table 1-1:Hazards and Impacts

Project Hazard	Potential Environmental Impact
Clearing and grubbing	Increased sediment load in run off impacting aquatic fauna and flora Spills of fuel/hydraulic fluids impacting soil and water quality
Excavation / Earthworks	Impacts to aquatic fauna and flora Water quality negatively impacted
Concreting	Water quality negatively impacted
Storage and use of flammable and combustible liquids and solids	Water quality negatively impacted
Dust suppression	Unnecessary load on water resources contributing to resource availability
Contaminated Materials	Impacts to aquatic fauna and flora Water quality negatively impacted Impacts to human health
Dewatering	Water quality negatively impacted
Flooding	Contamination of floodwater with construction waste

1.3 Project Compliance Requirements

1.3.1 Conditions of Project Environmental Approvals

Conditions of project environmental approvals that specifically address the management of water quality and quantity include:

Table 1-2 Development Consent Conditions relevant to Soil and Water Management

Development Consent (SSD-16928008)	Consent Requirement	CEMP Reference
B21	Prior to the commencement of construction, the Applicant must: (a) install erosion and sediment controls on the site to manage wet weather events; and (b) divert existing clean surface water around operational areas of the site.	SW1 – SW6 (Table 1-3)
B22	Prior to the commencement of construction, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'.	SW2, SW3, SW4 (Table 1-3)
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Part A Section **Error! R eference source not found.**
C22	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	SW1 – SW6 (Table 1-3)
C24	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the satisfaction of Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	SW10 (Table 1-3)
C26	Within three months of the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifier. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in Appendix G of the EIS, being *Stormwater and Flooding Assessment SSDA SEARS Conditions Report* and accompanying stormwater drawings, prepared by Meinhardt Bonacci and dated November 2021, were appropriate; (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with *Australian Rainfall and Runoff* (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines.	SW18 (Table 1-3)

1.4 Controls Used to Manage Water Quality

Controls that are adequate to minimise water use and potential water quality impacts, to ensure compliance, and to reduce risk are implemented before any relevant works commence. Elimination of the hazard is the first preference of control, followed by engineering, then administrative controls. Typical controls used on this project include:

Table 1-3: Water quality controls

Ref.	Control	Accountability
SW1	Ensure all soil and water risks are considered as part of the development of Construction Area Plans and Work Packs.	Project Engineers
SW2	Erosion and Sediment Control Plans (ESCP) are developed by a suitably qualified person (e.g. Certified Professional in Erosion and Sediment Control (CPESC) or other demonstrated experience) in consultation with the construction team.	Project Environmental Representative
SW3	Erosion and Sediment Controls (ESC) shall be designed (stability, location, type and size), constructed, operated and maintained in accordance with the "Blue Book" (*Managing Urban Stormwater: Soils & Construction*, 4th Edition Landcom 2004), and approved by the Project Environmental Representative and Site Supervisor.	Construction Manager
SW4	Ensure erosion and sediment control devices are constructed and installed as per the approved drawings, ESCP or Site Environment Plan as relevant.	Site Supervisor
SW5	Clean water diversions will be installed prior to the commencement of work.	Site Supervisor
SW6	ESC will be installed prior to (or immediately upon) any disturbance to vegetation or soil. These controls will remain in place until revegetation, stabilisation or hard scaping has occurred. If these controls require maintenance notify your supervisor.	Site Supervisor All
SW7	So far as reasonably practical cleared areas will be kept to a minimum and will be progressively rehabilitated/revegetated as they become available.	Construction Manager
SW8	Establish stabilised access, rumble grids, wash bays or similar for site exits to minimise mud on public roads. Sweepers must be used periodically to clean public roads where mud has been deposited.	Construction Manager
SW9	All materials will be stockpiled away from water flow paths.	Site Supervisor
SW10	Sediment laden water (dirty water) captured onsite will be preferentially reused e.g. dust control.	Site Supervisor
SW11	Water transfers / movement around site and discharged from site will be undertaken in accordance with the project's dewatering procedure/ Permit to Dewater process. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter.	Construction Manager
SW12	An adequate number of concrete washout facilities will be available & maintained. The washout facilities will be isolated from surface water flows using bunds to prevent contamination of clean surface waters and will be lined to prevent contamination of soil and ground water	Site Supervisor
SW13	The quantity of water consumed on the project from each of the following sources are reported monthly: ▪ Potable water, ▪ Water obtained under an extraction licence or other regulatory authority, ▪ Recycled water sourced from outside the project. [Excludes water from marine environments and water harvested from within the boundary of the project].	Project Environmental Representative
SW14	All hazardous substances (liquids and solids) are stored and managed according to AS1940.	Site Supervisor

Ref.	Control	Accountability
SW15	All refuelling points, including refuelling/lube trucks, will have hydrocarbon spill kits.	**Site Supervisor**
SW16	Opportunities to minimise the use of potable/ fresh water will be continually sought and adopted as appropriate.	Construction Manager & Project Environmental Representative
SW17	All dewatering related complaints will be investigated and recorded. Relevant corrective actions are to be agreed and implemented, with accountabilities and time frames assigned. The complainant or enquirer is notified of the response as soon as practical. All env complaints and close out actions are reported to the PM regularly (e.g. at least monthly).	Project Environmental Representative/ Project Engineers
SW18	In accordance with standard construction practices weather forecasts shall be used to guide work activities undertaken on-site. Forecasts shall be checked at the start of each day and prior to undertaking new work activities that may be affected by rainfall or adverse weather. Where weather forecasts predict conditions that may pose an environmental risk, site environmental controls shall be inspected and secured to reduce erosion and sediment control impacts. Contingency planning to prevent spills shall also involve monitoring for predicted flood events and the removal of plant, equipment, fuels and chemicals from flood prone areas.	Project Environmental Representative/ Project Engineers
SW19	Within three (3) months of the commencement of construction, an operational stormwater management system for the development must be designed and submitted to the satisfaction of the Certifier. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in Appendix G of the EIS, being Stormwater and Flooding Assessment SSDA SEARS Conditions Report and accompanying stormwater drawings, prepared by Meinhardt Bonacci and dated November 2021, were appropriate; (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.	Design Manager

1.5 Monitoring

The quantity of water used from potable supplies or other regulatory authority or agreement, including recycled water obtained from outside the project, will be captured and reported in Synergy. Where the information is not available from an invoice, other processes will be put in place to obtain the data and the information entered manually.

No quantitative water quality monitoring is proposed to be undertaken as part of the works. Water quality testing shall be performed prior to any required dewatering in accordance with the Permit to Dewater process. No discharges are to occur without a signed Permit to Dewater, supervision is required, reusing water where possible and implementing pollution control techniques such as discharging over grassed swales or vegetated areas.

Where water is pumped into a sediment basin it may require flocculation with gypsum and pH correction with lime to hasten the treatment process.

Table 1-4 Discharge Criteria

Parameter	Units	Typical EPL Criteria	Sampling Frequency	Sampling Method
pH	pH units	6.5 – 8.5	Prior to discharge to stormwater	Probe
Total Suspended Solids (TSS	mg/L	<50	Prior to discharge to stormwater	Lab testing to identify correlation between Turbidity (NTU) and TSS. Testing on site to be for NTU.
Oil and Grease	-	No visible oil or grease	Prior to discharge to stormwater	Visual and olfactory observation

The project will use turbidity (NTU) in place of TSS to determine compliance with the Total Suspended Solids criteria. CPB will develop a statistical correlation which identifies the relationship between NTU and TSS for water quality in the sediment basins and excavations in order to determine the NTU equivalent of 50 mg/L TSS before NTU is used.

The project requirements for monitoring are detailed in the MIRRA schedule (Appendix D)

Where monitoring determines non-compliance to be a risk or to have occurred, an incident report and corrective actions are raised in Synergy.

Monitoring and analysis of data will be carried out by a competent person.

It is the accountability of the Project Environmental Representative to ensure all monitoring is performed according to these requirements.

1.6 References

Civil Works SSDA SEARS Conditions Reports for Nepean Hospital Development – Stage 2 Tower & Future Developments Civil (Rev C dated 03/11/2021 by Meinhardt Bonacci)

Environmental Impact Statement Nepean Hospital Stage 2 Redevelopment (Version 3 dated 16 December prepared by _planning for Health Infrastructure)

Stormwater and Flooding Assessment SSDA SEARS Conditions Reports for Nepean Hospital Development – Stage 2 Tower & Future Developments Civil (Rev C dated 03/11/2021 by Meinhardt Bonacci)

Soils and Construction 4th Ed (March 2004) – Managing Urban Stormwater: (https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Water-quality/managing-urban-stormwater-soils-construction-volume-1-fourth-edition.pdf)

2. Heritage Subplan

2.1 Scope

This Plan addresses Heritage management (Aboriginal and Non- Aboriginal heritage) on the project and the management of impacts to the environment and/or community. Activities conducted on the project that have the potential to impact heritage values are captured in Table 2-1 .

Table 2-1 Heritage hazards and risks

Project Activity	Environmental Hazard	Environmental Risk
Excavation / Ground disturbance	Unexpected discovery	Damage to heritage items
Plant and machinery operation	Impact on heritage items Entrance to heritage areas	Breach of legislation Damage to heritage

The EIS concluded that the Project would not adversely impact on any heritage items or places of significance. The Project is located on the Hospital campus which does not contain any heritage items nor is it located within a heritage conservation area. No heritage structures are to be impacted.

There are number of local heritage items in the vicinity of the proposed development, namely:

- Penrith General Cemetery (item no. 97) - bounded by Copeland and Phillips Streets, Richmond Road and Cox Avenue to the north east of the site.
- weatherboard cottage (item no. 175) located at 71 Parker Street.
- “Kevin brae”, Federation house (item no. 854) - located at 142 High Street.

The EIS also stated that there is also nil to low potential to contain archaeological evidence that would be subject to the relics provisions of the NSW Heritage Act 1977 (as amended). Standard stop work procedures would apply should heritage items be suspected or found during construction activities. Should unanticipated relics be discovered during the Project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic. Relics are historical archaeological resources of local or State significance and are protected in NSW under the Heritage Act 1977. Relics cannot be disturbed except with a permit or exception/exemption notification.

Figure 2-1: Surrounding heritage items in relation to project site (Source EIS)

Standard stop work procedures would apply should heritage items be suspected or found during construction activities. Should unanticipated relics be discovered during the Project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic. Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1977*. Relics cannot be disturbed except with a permit or exception/exemption notification.

2.2 Scope

This Sub-plan addresses Heritage (Indigenous and non-indigenous) management on the project and the management of potential impacts to the environment and/or community.

Activities conducted on the project that have the potential to impact heritage values are listed below.

Table 2-2: Hazards and Impacts

Project Hazard	Potential Environmental Impact
Excavation / Ground disturbance	Incidents of damage to heritage items, places or values Complaints from the Regulators or traditional owners as a result of the works undertaken
Plant and machinery operation	Breach of legislation Damage to heritage items

2.3 Plan objectives

Based on the requirements defined above, the findings of project risk management processes and the potential impacts to the community, the following targets have been set. Any deviation from the targets will result in Project Management immediately implementing corrective actions:

Table 2-3 Heritage performance objectives

Metric/Measure	Objective	Timeframe	Accountability
Incidents of damage to heritage items, places or values	Zero	Duration of Project	Project Manager
No complaints from the Regulators or traditional owners as a result of the works undertaken	Zero	Duration of Project	Project Manager

2.4 Project Compliance Requirements

2.4.1 Conditions of Approval

Conditions of approval that specifically address the management of heritage are captured in Table 2-4 .

Table 2-4 Heritage Conditions of Approval

SSD Reference	Relevant Condition	CEMP Reference
B15 (b)	An unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	Section 2.6
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Part A Section 2.2
C28	In the event that surface disturbance identifies a new Aboriginal object: (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; (c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the	Section **Error! R eference source not found.** H6 (**Error! Reference s ource not found.**

SSD Reference	Relevant Condition	CEMP Reference
	management outcome for the site included in the information provided to AHIMS; (d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and (e) works may only recommence with the written approval of the Planning Secretary.	
C29	If any unexpected archaeological relics are uncovered during the work, then: (a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary; (b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and (c) works may only recommence with the written approval of the Planning Secretary.	Section 2.6

2.5 Controls Used to Manage Heritage

Controls that are adequate to manage Heritage and to reduce risk to the lowest acceptable rating achievable are implemented before any relevant works commence. Elimination of the hazard is the first preference of control, followed by engineering, then administrative controls. Controls used on this project are listed in Table 2-5 **.**

Table 2-5 Heritage controls

Ref.	Control	Accountability
H1	Ground disturbance must not take place until a Land Disturbance Permit has been authorised.	Project Environmental Representative
H2	Ensure all risks to heritage features of the project are considered as part of the development of Construction Area Plans and Work Packs.	Project Engineers
H3	All site personnel will undertake a Site Induction which includes Aboriginal cultural awareness and project heritage training, including any project specific management obligations. Site specific heritage management controls training will be provided for personnel who are likely to work near protected heritage items or areas.	Project Environment Manager / Construction Manager
H4	Obtain relevant pre-commencement work permits (e.g. Permit to Clear, Permit to Dewater, Permit to enter No Go zone) All necessary approvals will be obtained prior to commencing any works in areas of known or potential heritage items.	Project Engineers and Site Supervisors
H5	All cultural heritage items and places to be protected will be fenced/flagged and sign posted as No-go zones. These sites shall be shown on site plans and communicated to relevant workforce. Entry to protected areas shall only be permitted following Project Environmental Representative approval.	Project Engineers and Site Supervisors All
H6	Work will cease immediately upon the discovery of any object which may be a heritage item within the meaning of the relevant legislation, or suspected human remains. The Supervisor and Project Environmental Representative will be notified immediately. The unexpected finds process shall be implemented as outlined in section **Error! Reference source not found.**. No works will be allowed to continue until a permit or clearance has been received from the relevant authority (as applicable) and Project Environment Representative.	All

2.6 Unexpected finds procedure

If surface disturbance identifies a new Aboriginal item/object or unexpected archaeological relic, all works must halt in the immediate area to prevent any further impacts.

Immediately following halt of works the Supervisor, Project Manager and Project Environment Representative will be notified of the discovery and commence relevant notifications in accordance with the incident management procedure with the client.

For Aboriginal items / objects, a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW and the management outcome for the site included in the information provided to AHIMS. The archaeologist must consult with the Aboriginal community representatives (where required) and Heritage NSW to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of DPHI.

For non-Aboriginal items, Heritage NSW and DPHI will be contacted for direction and advice. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works shall only recommence with the written approval of DPHI.

2.7 Monitoring

Heritage monitoring will be restricted to unexpected discoveries during construction. Site personnel will be educated in the requirements to notify and stop working in the event of a potential unexpected find. The Project Environment Representative will undertake routing inspections which will include the review of site activities to identify potential non-compliances with the unexpected finds procedure.

Where monitoring determines non-compliance to be a risk or to have occurred, an incident report and corrective actions are raised in the Synergy.

Monitoring and analysis of data will be carried out by the Project Environmental Representative during construction as part of the routine inspections. Evidence of competence must be retained.

It is the accountability of the Project Environmental Representative to ensure all monitoring is performed according to these requirements.

2.8 References

Aboriginal Archaeological Cultural Heritage Assessment Report Nepean Hospital Redevelopment Stage 2 (November 2021, prepared by Comber Associates)

Environmental Impact Statement Nepean Hospital Stage 2 Redevelopment (Version 3 dated 16 December prepared by _planning for Health Infrastructure)

Statement of Heritage Impact Nepean Hospital Redevelopment Stage 2 (July 2021, prepared by Extend Heritage Advisors)

3. Flora and Fauna Subplan

3.1 Background / Context

The subject land and surrounding area are highly developed urban areas with little remaining vegetation or habitat connectivity.

The vegetation within the subject land is highly modified and generally comprises planted native and exotic species interspersed with few remnant native trees. The remnant trees are consistent with the Endangered Ecological Community (EEC) 'Cumberland Plain Woodland' (Plant Community Type (PCT) 849), as listed critically endangered under the NSW Biodiversity Conservation Act 2016 (BC Act), albeit considered to be in poor condition.

The EIS identified the project site as providing suitable habitat for some common bird and mammal species, yet contained little habitat for any threatened fauna species. Due to the highly modified landscape and soil profile, the EIS concluded that no suitable habitat is present for threatened flora. No threatened species were recorded in the subject land during the BDAR field surveys, or have been recorded in previous studies on the project area.

The closest waterway is Werrington Creek (a first order stream) is approximately 1km from the project site.

Appendix H and M contain the Aboriculture Development Assessment Report (BDAR) and Biodiveristy Report respectively.

3.2 Scope

This Plan addresses flora and fauna management on the Project and the management of impacts to the environment and/or community.

Activities conducted on the project that have the potential to impact flora and fauna are provided below.

Table 3-1: Hazards and Impacts

Project Hazard	Potential Environmental Impact
Vehicle and plant movements	Damage to existing trees outside of clearing areas Damage to existing trees required to be retained
Earthworks and vehicle/plant movements	Weed infestations causing loss of native flora
Refuelling / hazardous materials handling and storage	Loss of aquatic flora/fauna species

3.3 Plan objectives

Based on the requirements of the Project approval and the findings of project risk management processes, the performance targets in Table 3-2: have been set. Any deviation from the targets will result in Project Management immediately implementing corrective actions.

Table 3-2: Flora and fauna performance objectives

Metric/Measure	Objective	Timeframe	Accountability
Number of native fauna injured through construction activities	Zero	Construction period	Project Manager
Tree protection measures to be in place	No Nonconformances	Construction period	Project Manager
Number of actions taken by regulators and/or client	Zero	Construction period	Project Manager

3.4 Project Compliance Requirements

3.4.1 Conditions of Approval

Conditions of approval which set limits and/or specify requirements relating to fauna or flora are stated in Table 3-3.

Table 3-3 Flora and fauna Conditions of Approval

Condition of Approval	Consent Requirement	CEMP Reference
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Section 2.2
C19	For the duration of the construction works: (a) within one week prior to any removal of vegetation a pre-clearance survey is required to be undertaken by a qualified ecologist to identify, number and flag hollow-bearing trees and other habitat features such as nests or hollow logs proposed to be removed. The results of the pre-clearance survey are to be submitted to the Certifier to inform tree clearance protocols; (b) during any tree removal, an experienced and qualified ecologist is to be present to relocate any displaced fauna that may be disturbed during this activity. All non-habitat vegetation is to be cleared first to allow appropriate space for the felling of habitat trees and retrieval of any fauna that may be present within habitat trees. Trees with hollows are to be lopped in such a way that the risk of injury or mortality to fauna is minimised, such as top-down lopping, with lopped sections gently lowered to the ground, or by lowering whole trees to the ground with the “grab” attachment of a machine. Any injured fauna is to be appropriately cared for and released on site when re-habilitated; (c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Development Assessment Report (prepared by Moore Trees and dated 25 November 2021) (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater; and (e) mitigation measures outlined in Table 6-1 of the submitted Biodiversity Assessment Report by Total Earth Care dated November 2022 must be implemented.	**Table 3-4**

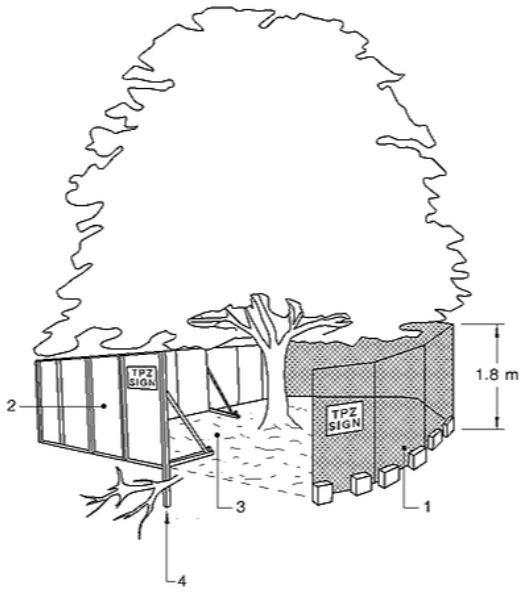
3.5 Controls Used to Manage Flora and Fauna

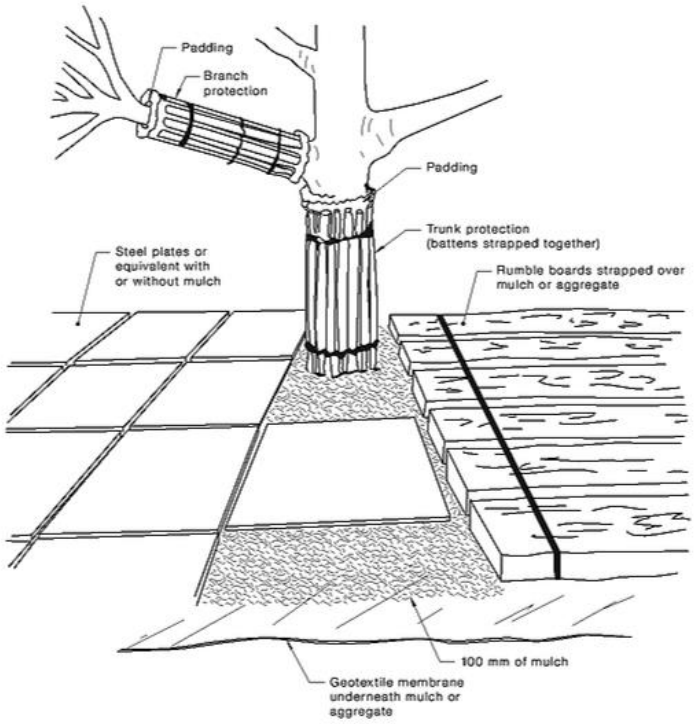
Controls to manage flora and fauna risks and to reduce risk to the lowest acceptable rating achievable are implemented before any relevant works commence. Elimination of the hazard is the first preference of control, followed by engineering, then administrative controls. Typical controls used on this project include:

Table 3-4 Flora and fauna controls

	Control	Accountability
F**F1**	Ensure all risks to flora and fauna are considered as part of the development of Construction Area Plans and Work Packs.	Project Engineer/ Site Supervisor
FF2	Ensure limits of work are: ▪ located within the approved project construction footprint, ▪ shown on design plans, Site Environmental Plans or another relevant site documentation	Project Engineer

	Control	Accountability
	▪ marked onsite (e.g. flagged, fenced, sign-posted) and are visible to workers and plant operators prior to the commencement of works ▪ discussed at pre-starts and/or toolbox talks ▪ regularly inspected and maintenance	
FF3	Ensure that prior to any disturbance, clearing or grubbing activities the following occurs: ▪ onsite delineation of clearing limits ▪ a Permit to Clear approved by the Project Environment Representative (or delegate) is issued ▪ no-go Zones are established for flora or fauna protection areas ▪ weed infested areas are delineated and weed management practices communicated to relevant site staff and sub-contractors ▪ wildlife catchers/spotters or the Project Environmental Representative has conducted a search for wildlife that may need to be removed and relocated ▪ a Pre-Clearing Inspection Checklist has been completed and approved by the Project Environment Representative, this includes the pre clearance survey by a suitably qualified and experienced ecologist. ▪ Disturbance of vegetation will be limited wherever possible.	Project Engineer/ Site Supervisor
FF4	All in/over waterway structures shall be designed and constructed in accordance with State/local environmental management guidelines and project obligations.	All
FF5	Site Supervisor shall be notified of; ▪ damage to No-Go Zone fencing or signage immediately ▪ any unapproved land disturbance immediately	All
FF6	A reduced site speed shall be implemented where necessary to reduce fauna / vehicle collisions.	Site Supervisor
FF7	All plant shall remain on haul roads to minimise damage to vegetation and fauna habitats.	All
FF8	Cleared vegetation will be beneficially used either where practical (e.g. for habitat enhancement works, chipped for mulch and reused). Where it cannot be beneficially used, it will be disposed of at a licenced waste facility. No rubbish, debris, or vegetation waste is to be dumped in the retained vegetation.	Project Environment Representative
FF9	If a threat to an animal is evident onsite all site staff shall contact their Supervisor and Project Environmental Representative immediately. Works may need to cease if the animal is in danger or harmed until it has been relocated. Project ecologist or fauna rescue volunteers (Sydney Metro Wildlife on 9413 4300 or WIRES on1300 094 737) to be contacted regarding fauna relocation.	Site Supervisor
F**F10**	▪ Tree Protection Zones (TPZ) are to be established around trees that are to be retained: **TPZ radius = (diameter at breast height) x 12** ▪ Any damage to existing trees must be reported to CPB Site Manager immediately. ▪ Roots discovered are to be treated with care and minor roots (<40mm dia.) pruned with sharp clean handsaw. All significant roots (>40mm dia.) to be recorded, photographed and reported to arborist. ▪ Trees within the construction area not proposed to be removed are to be protected. Protection measures may include protective fencing, trunk and ground protection, tree protection signage and involvement of the project arborist. ▪ Activities prohibited within the TPZ include: - Machine excavation - Storage - Preparation of chemicals, including cement products - Parking of vehicles - Refueling - Dumping of waste - Wash down and cleaning of equipment	Site Supervisor

	Control	Accountability
	- Placement of fill - Lighting of fires - Soil level change - Temporary or permanent installation of utilities and signs - Physical damage to the tree ■ Protective fencing to trees and their trunk to be installed using standard techniques (refer AS 4970-2009) and as depicted below:  LEGEND: 1 Chain wire mesh panels with shade cloth (if required) attached, held in place with concrete feet. 2 Alternative plywood or wooden paling fence panels. This fencing material also prevents building materials or soil entering the TPZ. 3 Mulch installation across surface of TPZ (at the discretion of the project arborist). No excavation, construction activity, grade changes, surface treatment or storage of materials of any kind is permitted within the TPZ. 4 Bracing is permissible within the TPZ. Installation of supports should avoid damaging roots. FIGURE 3 PROTECTIVE FENCING	

	Control	Accountability
	 NOTES: 1 For trunk and branch protection use boards and padding that will prevent damage to bark. Boards are to be strapped to trees, not nailed or screwed. 2 Rumble boards should be of a suitable thickness to prevent soil compaction and root damage. FIGURE 4 EXAMPLES OF TRUNK, BRANCH AND GROUND PROTECTION	
FF11	If access is required to the TPZ, a suitably qualified and experienced arborist must be consulted and supervise the works. Additional tree protection measures may be required to be installed as recommended by the arborist. Removal of the tree protection measures are to be supervised by the arborist.	Arborist Project Engineer
FF12	Weed Management ▪ Vehicle and machinery wash/brush downs will be conducted before vehicles leave the proposal site to minimise the risk of spreading weed and pathogen species during construction. ▪ Priority weeds will be managed according to the requirements of the *Biosecurity Act 2015*. Local indigenous plant species be utilised in the landscaping wherever possible in accordance with the landscape plan. ▪ Stockpiles of materials containing invasive weed plant matter should be covered and bunded to prevent spread. ▪ Any herbicides used for weed control will be applied to the manufacturer's specifications and as outlined in the manufacturer's Safety Data Sheet. Spraying of herbicides will not be undertaken in windy weather or within such distance of a watercourse as will permit any of the herbicide to enter the water.	Site Supervisor
FF13	Should any additional clearing of vegetation be required (ie. Through design changes or instructions) within the Plant Community Type 849 area, the BDAR is to be revised with regards to offset requirements.	All
FF14	Construction site fencing is to be installed around the demolition site. Vehicle and workforce access points and roads to the construction compounds are to be clearly designated and controlled for authorised access only.	Project Engineer

3.6 Monitoring

Given the nature and location of the Project, monitoring will be restricted to tree protection zones and exclusion areas, and isolated fauna sightings. This monitoring will identify potential non-compliances before they occur.

Where monitoring determines non-compliance to be a risk or to have occurred, an incident report and corrective actions are raised in Synergy.

Monitoring and analysis of data will be carried out by the site Project Environmental Representative and Construction Manager as part of the routine site inspections. Evidence of competence shall be retained.

It is the responsibility of the Project Environmental Representative to ensure all monitoring is performed according to these requirements for the project.

3.7 References

Arboricultural Development Assessment Report for Nepean Hospital Redevelopment Stage 2 Works (Version Final dated 19/06/2023)

Biodiversity Development Assessment Report for Stage 2 Redevelopment of Nepean Hospital (prepared by total earth care, Vinal v1 dated 14/04/2022)

Environmental Impact Statement Nepean Hospital Stage 2 Redevelopment (Version 3 dated 16 December prepared by _planning for Health Infrastructure)

4. Air Quality Subplan

4.1 Scope

This Sub-plan addresses air quality management and the avoidance of potential impacts to the environment and/or community. This refers to the emission of dust and particulate matter that can impact the workplace and neighbouring areas. Sources of emission may include:

- Vehicle emissions and transport on haul roads
- Drilling and blasting activities
- Land clearing and removal of topsoil and overburden
- Loading and unloading of materials
- Wind on stockpiles and exposed areas.

Activities conducted on the project that have the potential to impact air quality are provided below. These have been extracted from the project work flow, including activities and materials used.

Table 4-1: Hazards and Impacts

Project Hazard	Potential Environmental Impact
Dust and sediment on roads as a result of earthworks, demolition and stockpiling operations	Nuisance dust to personnel Airborne dust/ sediment affecting waterways Effects of dust on persons with suppressed immune systems
Contaminated material and particles becoming airborne during remediation	Environmental hazard to construction personnel and general public
Exhaust fumes from the operation of plant and machinery	Odour effects and health effects from exposure to carbon monoxide
Wind blown rubbish from general construction activities	Nuisance dust to personnel Airborne dust/ litter affecting waterways

4.2 Project Compliance Requirements

4.2.1 Contract Clauses

Specific contract clauses and references which set limits and/or govern impacts on air quality on the project include:

Table 4-2 Contract Clauses relevant to Air Quality Management

Contract Reference	Contract Clause	Requirement
MW GC21 e2	5.7	Provide asbestos air monitoring by an independent testing authority engaged by the Contractor, in respect of the following: ▪ for each day that demolition, ground remediation and any works involving existing fill material likely to contain asbestos, are being carried out; and ▪ otherwise on each day during asbestos removal until completion of each area where removal has been undertaken. To avoid any doubt, asbestos air monitoring for demolition and ground remediation is not subject to asbestos being present or removed.
MW GC21 e2	5.17	The Contractor must take all reasonable precautions to avoid nuisance or trespass of any nature to any surrounding or adjoining areas to the Site, as a result of undertaking the Works, including by way of dust, mud, debris, noise, obstruction, vibration, or by its employees, agents, subcontractors or visitors or any other cause. The Contractor must utilise reasonable methods (having regard to the use and operation of any existing health facilities in close proximity to the Site) of noise and dust suppression on all compressors, jack-hammers and other

Contract Reference	Contract Clause	Requirement
		machinery of whatsoever description to ensure that the noise and dust levels emanating from the Site during the Works are minimised. Without limiting these requirements, the Contractor shall comply with all relevant codes and shall also erect screens (both visual and acoustic) or take other reasonably necessary preventative measures to prevent noise, dust and damage to surrounding or adjoining properties (public and private) and shall arrange for the programming of the Works to avoid or minimise any such issues occurring.

4.2.2 Conditions of Project Environmental Approvals

Conditions of project environmental approvals that specifically address the management of air quality include:

Table 4-3 Development Consent Conditions relevant to Air Quality

Development Consent (SSD-16928008)	Consent Requirement	CEMP Reference
C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	AQ10 (Table 4-4)
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Part A Section 2.2
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	Table 4-4
C21	During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	Table 4-4

4.3 Controls Used to Manage Air Quality

Controls that are adequate to minimise air quality issues are implemented before any relevant works commence.

Elimination of the hazard is the first preference of control, followed by engineering, then administrative controls. Typical controls used on this project include:

Table 4-4: **Air quality controls**

Ref	Control	Accountability
AQ1	Air quality management requirements shall be considered when developing Construction Area Plans and Work Packs.	Project Engineers
AQ2	Establish stabilised access, rumble grids, wash bays or similar for site exits to minimise mud on public roads. Sweepers must be used periodically to clean public roads where mud has been deposited.	Construction Manager

Ref	Control	Accountability
AQ3	Ensure site traffic speed limit(s) are determined and implemented to minimise dust generation	Construction Manager
AQ4	Vegetation and other soil disturbance shall be minimised to reduce erosion hazards. Rehabilitation, seeding or grassing shall occur as soon as practical following disturbance.	Construction Manager/ Project Engineers
AQ5	Disturbed areas and haul roads will be treated with dust suppressants (e.g. water trucks or chemical suppressants) especially in high risk areas and/or on during high risk days.	Site Supervisor
AQ6	Report any occurrences of increased dust to your supervisor immediately	All
AQ7	All construction plant and equipment will be maintained so they do not emit visible smoke for any period greater than: ■ 15 consecutive seconds for plant not being registered for use on public roads; and ■ 10 consecutive seconds for plant registered for use on public roads.	Plant Manager/ sub-contractors
AQ8	Burning of any materials is prohibited onsite.	All
AQ9	Conduct task observations as per project schedule to ensure ongoing effectiveness of air quality management measures.	Construction Manager, SH&E Manager and/or Subcontractor Supervisor
AQ10	All construction plant and equipment used on site will be maintained in accordance with manufacturers specification and operated in a proper and efficient manner.	Plant Manager/ sub-contractors
AQ11	All trucks carrying potential dust generating materials (eg. spoil) entering or leaving the project site must have their loads covered.	Plant Manager/ sub-contractors

4.4 Monitoring

Air quality monitoring is performed that complies with legal and contract requirements particularly during demolition activities and contaminated material management as advised by specialists. Air quality monitoring for dust and vehicle emissions during non-remediation activities will be undertaken as daily visual monitoring of dust leaving site.

Where monitoring determines a non-conformance has occurred, a non-conformance report and/or incident report and corrective actions will be raised.

Monitoring will be carried out by a competent person. Evidence of competence will be retained.

It is the accountability of the Project Environmental Representative (or delegate) to ensure all monitoring is performed according to these requirements.

4.4.1 Air quality monitoring during remediation

Refer to section 9.11 of the RAP for detailed instructions on air quality requirements during remediation and contamination works. A summary of the monitoring commitments is provided below for information purposes:

- During remediation activities, airborne asbestos fibres monitoring will be undertaken at a minimum of five static locations. Monitoring locations will include site perimeter locations and downwind locations.
- During contaminated soil remediation works, real-time aerosol monitoring shall be undertaken at five locations, twice daily for ten minutes (morning and afternoon).

4.5 References

Environmental Impact Statement Nepean Hospital Stage 2 Redevelopment (Version 3 dated 16 December prepared by _planning for Health Infrastructure)

5. Contamination Sub-plan

5.1 Background / Context

As part of the projects EIS, preliminary and detailed site investigations were undertaken. The preliminary site investigation concluded that based on the potential contamination sources and areas of environmental concern identified (associated with asbestos in fill), and the potential for contamination, further investigation of the contamination conditions was required. A detailed site investigation was undertaken which determined that remediation will be needed at the site to address isolated and limited asbestos finds. A Remediation Action Plan (RAP) was prepared by JK Environments to aiming to remediate the site to reduce human health risks posed by the site's contamination to acceptable levels.

Appendix I contains the Pre-Demolition Hazardous Buildings Material Survey. Appendix J contains the Asbestos Management Plan for the project. Appendix L contains the Remediation Action Plan for the project.

5.2 Scope

This Sub-plan addresses Contaminated Land management on the project and the management of potential impacts to the environment and/or community.

Activities conducted on the project that have the potential to create soil contamination are listed below.

Table 5-1:Hazards and Impacts

Project Hazard	Potential Environmental Impact
Earthworks / excavation	Persons exposed to contaminated materials
Importing material	Importing contaminated material Persons exposed to contaminated materials Non-compliance with conditions of approval
Plant operations	Accidental release of contaminants to stormwater affecting water quality and loss of aquatic species

5.3 Project Compliance Requirements

5.3.1 Conditions of Project Environmental Approvals

Conditions of project environmental approvals that specifically address the management of contaminated material include:

Table 5-2 Development Consent Conditions relevant to Contaminated Land

Development Consent (SSD-16928008)	Consent Requirement	CEMP Reference
B29	Prior to the commencement of construction, the Applicant must engage a NSW EPA-accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.	Table 5-3
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Part A Section 2.2
C23	The Applicant must: (a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request.	Table 5-3

Development Consent (SSD-16928008)	Consent Requirement	CEMP Reference
C36	Remediation of the site must be carried out in accordance with the Remediation Action Plan prepared by JK Environments and dated 14 December 2021 and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	Table 5-3
C37	Where remediation is carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	Table 5-3
C38	If work is to be carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	Table 5-3
C39	The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.	Table 5-3

5.4 Controls Used to Manage Contamination

Controls that are adequate to manage Contamination and to reduce risk to the lowest acceptable rating achievable are implemented before any relevant works commence. Elimination of the hazard is the first preference of control, followed by engineering, then administrative controls. Typical controls used on this project include:

Table 5-3: Contamination controls

Ref	Control	Accountability
C1	Contaminated land and general contamination risks shall be considered when developing Construction Area Plans and Work Packs.	All
C2	When contaminated materials are discovered or suspected, works will cease, and the Supervisor and Project Environmental Representative notified immediately. The Project Environmental Representative shall advise if testing by a competent person will be conducted and a management strategy developed.	All
C3	Ensure contaminated land is handled, stockpiled, reused and/or disposed of as per the project's contamination management strategy (as applicable).	Site Supervisor
C4	The movement of materials will be tracked via a Materials Tracking form/system.	Project Engineers
C5	Contaminated water runoff from suspected or actual contaminated land and stockpiles will be contained, treated and managed in accordance with contractual and approval obligations.	Site Supervisor
C6	All vehicles, plant and other machinery operating in contact with contaminated soil will be decontaminated prior to leaving site.	Site Supervisors
C7	Remediation of the site shall be undertaken in accordance with the approved Remediation Action Plan (RAP). Testing shall comply with the contractual and legislative requirements and the approved RAP. Remediation sign off shall be completed by the EPA Accredited Site Auditor.	Project Environment Manager / Construction Manager
C8	Soil, and soil leachate, containing contaminant concentrations below the relevant environmental investigation level will be assessed for unrestricted reuse, subject to other site restrictions and excluding any geotechnical requirements. This assessment will be undertaken by a competent person.	Project Environment Manager

C9	Soil, and soil leachate, containing contaminant concentrations above the relevant environmental investigation level will be assessed for controlled reuse in non-environmental sensitive areas of the site	Project Environment Manager
C10	Where the above outcomes are not acceptable, other options such as (re)treatment, off-site disposal or a site-specific risk assessment be considered, as determined by Regulators and Competent Assessors.	Project Environment Manager
C11	Contamination Consultant and Occupational Hygienist to be engaged to assess any known or potential contamination risk and to oversee the management of the disposal.	Project Manager
C12	An NSW EPA Accredited Site Auditor shall be engaged by the project to provide advice throughout the duration on works and ensure contamination is being appropriately managed	Project Manager
C13	A register is to be developed to record and track the management of all contaminated material. The register will identify: ▪ The nature of the material ▪ The precise location of the material within the collection point ▪ All information, data and records relating to the disposal offsite of the contaminated material the subject of a Contaminated Material Notice (including testing and transport costs) ▪ Cost, data and details of aggregated disposal costs of any Contaminated Material (including testing and transport costs).	Engineer Project Environment Manager
C14	The Contractor must ensure that Material to be imported onto the Site, including fill material, is accompanied by a clearance certificate provided by the supplier. The Contractor shall undertake and provide the Principal with further testing (conducted by an independent person) when the Material arrives on Site (and before using or incorporation into the Works) to verify that it is free of contaminants. Only Virgin Excavated Natural Material (VENM), Excavated Natural Material (ENM), or other material approved that meets the requirements of a relevant order or exemption issued by the EPA to brought onto the site. Provide copies the accurate records (material tracking) of the volume and type of fill used on the project to the Certified upon request.	Project Environment Manager / Construction Manager

5.5 Monitoring

Contaminated Land monitoring is performed that complies with legal and contract requirements.

Where monitoring determines a non-conformance has occurred, a non-conformance report and/or incident report and corrective actions will be raised.

Monitoring and analysis of data will be carried out by a competent person. Evidence of competence will be retained.

It is the accountability of the Project Environmental Representative (or delegate) to ensure all monitoring is performed according to these requirements.

5.6 References

Environmental Impact Statement Nepean Hospital Stage 2 Redevelopment (Version 3 dated 16 December 2021 prepared by _planning for Health Infrastructure)

Hazardous Building Materials Survey Proposed Nepean Hospital Stage 2 Development (Final Report dated 5 November 2021) prepared by JK Environments

Remediation Action Plan Proposed Nepean Hospital Stage 2 Development (Final Report dated 14 November 2021) prepared by JK Environments

6. Hazardous Substances Sub-plan

6.1 Scope

This Sub-plan addresses Hazardous substances management on the project and the management of potential impacts to the environment and/or community.

Activities conducted on the project that have the potential to create impacts associated with hazardous substances are provided below.

Table 6-1: Hazards and Impacts

Project Hazard	Potential Environmental Impact
Refuelling of plant	Spillages resulting in water quality impacts Skin/eye irritation from handling of diesel or petrol
General construction works involving the use of hazardous substances such as paints, glues, solvents, cleaning agents, water treatment chemicals, materials containing silica from work involving stone, rock, concrete, masonry	Spillages resulting in water quality impacts Organ toxicity, carcinogenic

6.2 Project Compliance Requirements

6.2.1 Conditions of Project Environmental Approvals

Conditions of project environmental approvals that specifically address the management of hazardous substances include:

Table 6-2 Development Consent Conditions relevant to Hazardous Substances Management

Development Consent (SSD-16928008)	Consent Requirement	CEMP Reference
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	Part A Section 2.2
C25	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction	Site Induction Emergency Response Plan
C34	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes,standards and guidelines	Demolition Works Plan

6.3 Controls Used to Manage Hazardous Substances

Controls to manage hazardous substances are implemented before any relevant works commence.

Elimination of the hazard is the first preference of control, followed by engineering, then administrative controls. Typical controls used on this project include:

Table 6-3: Hazardous substances controls

Ref	Control	Accountability
HZ1	Prior to purchasing hazardous chemicals, a risk assessment shall be completed, and approval provided to purchase. Workers are to be consulted when considering the introduction of a hazardous chemical into a work task.	Senior Project Engineer, Project Engineer or Subcontractor

Ref	Control	Accountability
	Refer to Tool: Hazardous Materials & Dangerous Goods Risk Assessment	
HZ2	Establish and maintain: 1. A register of approvals for the use of hazardous chemicals on the Project 2. An Emergency Services Register that is accessible at all times by Emergency Services, of all hazardous chemicals and their locations and quantities 3. A file that includes the relevant Safety Data Sheet (SDS) and the hazardous chemicals risk assessment, for all hazardous chemicals approved for purchase and use on the project Refer to Tool: SHE Register System Refer to Application: ChemAlert	Project Safety and Environment Managers
HZ3	Ensure all workers who will be required to purchase, use, store or dispose of hazardous chemicals are trained in the Hazardous Materials & Dangerous Goods Risk Assessment and SDS including: ▪ The use, storage and disposal of the Hazardous Chemical ▪ The signage and emergency provisions ▪ Any health surveillance or atmospheric monitoring required. ▪ Spills containment and management, including the use of land and aquatic spill kits Refer to Procedure: Manage Worker Competence Refer to Knowledge: Hazardous Material Dangerous Goods Refer to Knowledge: Hazardous Chemicals Training	Construction Manager
HZ4	Hazardous chemicals are to be stored in a bunded area with a minimum holding capacity of 110% of the largest container within the bund or 25% of the total capacity of all containers within it, whichever is the greatest Refer to Knowledge: Hazardous Substance Incompatibility Guide The required placarding to be installed at the entrance to the Project and storage areas Refer to Procedure: Undertake Construction Area Risk Review Refer to Knowledge: Hazardous Material Dangerous Goods	Construction Manager and Senior Project Engineer
HZ5	As part of the Work Pack Risk Assessment, incorporate relevant controls from the Construction Area Risk Review, identify additional hazards, assess the risks and further develop controls to eliminate/minimise risks to workers when working with hazardous substances. Refer to Procedure: Undertake Work Pack Risk Assessment	Project Engineers
HZ6	Ensure spill kits: ▪ are of adequate type and volume for materials stored, as well as potential operational spills ▪ are located adjacent to all hazardous substance storage units, in refuelling and maintenance areas ▪ are located at worksites in close proximity to waterways and are specific for aquatic use ▪ locations are identified on the Site Environment Plan and other emergency response documentation	Project Environmental Representative and Site Supervisors
HZ7	Refueling will not occur within 30m of a waterway (without appropriate controls in place).	Site Supervisors
HZ8	Containment devices, including bunds, separators and catch trays, will be used where there is a risk of spillage.	Site Supervisors

Ref	Control	Accountability
HZ9	Regular inspections will be carried out [e.g. daily by supervisors, and weekly by HSE representatives] to assess the storage and handling of hazardous materials.	Construction Manager / Project Engineers
HZ10	Undertake routine maintenance of plant and equipment for prevention of fuel leaks, visible exhaust emissions or other maintenance issues.	Construction Manager / Project Engineers
HZ11	An Emergency Response Plan which incorporates a spill response procedure shall be maintained for the project	Project HSE Representatives

6.4 Monitoring

Hazardous substances monitoring is performed that complies with legal and contract requirements.

Where monitoring determines a non-conformance has occurred, a non-conformance report and/or incident report and corrective actions will be raised.

Monitoring will be carried out by a competent person. Evidence of competence will be retained.

It is the accountability of the Project Environmental Representative (or delegate) to ensure all monitoring is performed according to these requirements.

6.5 References

Environmental Impact Statement Nepean Hospital Stage 2 Redevelopment (Version 3 dated 16 December prepared by _planning for Health Infrastructure)

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Appendix A: CPB Contractors Environment Policy & ISO 14001 Certification

Environment Policy

Purpose

This Policy sets out our environmental management commitments for managing environmental risks, exceeding our environmental compliance obligations, and avoiding environmental impacts.

Application

This Policy applies to all employees, and third parties controlled by the business, including alliances, joint ventures and consortia where the business exerts management control. It applies to all sections of the organisation.

To achieve our environmental management objectives, we will:

- Demonstrate a visible commitment to our One HSE Cultural Framework and take all reasonably practicable measures to prevent pollution and protect the environment.
- Ensure adequate environmental management resources are assigned, and continually improve the CPB Management System and our environmental performance.
- Set environmental objectives, targets and key performance indicators that are monitored at least annually.
- Identify, document, control, and monitor our Significant Environmental Aspects.
- Procure goods and services to maximise sustainable opportunities and innovate to reduce greenhouse gas emissions and implement climate change mitigation
- Evaluate our environmental performance through regular inspections and audits.
- Measure, record and optimise energy & water re-use efficiencies, together with maximising circular economy opportunities.
- Report and investigate environmental incidents with the aim of preventing a recurrence.
- Implement contingency planning and emergency response strategies to avoid environmental damage.
- Communicate and educate our teams to enable a good understanding of their environmental legal obligations.

Policy Information

Owner:	Group Manager, Environment, CPB Contractors
Approved By:	General Manager – SHEQS & Rail Safety, CPB Contractors
Effective date	31 August 2022

Title: Environment Policy
ID: MSID-7-150 Version: 5.0 **Date Published:** 06/09/2022
Management System - Uncontrolled Document when Printed

Certificate AU14/4487

The management system of

CPB Contractors Pty Limited

Level 18, 177 Pacific Highway North Sydney, NSW 2060, Australia

has been assessed and certified as meeting the requirements of

ISO 14001:2015

For the following activities

The provision of project management and related services including design, procurement, construction, traffic management at roadworks, completion, commissioning and maintenance of civil Infrastructure (including site preparation, road and bridge construction, non-building construction, plant hire and leasing), building, rail, water, utilities, tunnelling, energy, marine, mine infrastructure, structural, mechanical, piping and electrical engineering and related industries delivered under varying forms of contract including joint ventures and alliances. The scope of registration also includes the maintenance and repair of fixed and mobile plant and the manufacture of precast concrete units for major infrastructure works.

This certificate is valid from 26 December 2022 until 30 November 2025 and remains valid subject to satisfactory surveillance audits.

Issue 13. Certified since 06 December 1995

Certified activities performed by additional sites are listed on subsequent pages.

Last certificate expiry date 30 November 2022

Recertification audit date 21 October 2022

Authorised by
Sharn McAuliey
Authorised Officer

SGS Australia Pty. Ltd.
10/585 Blackburn Road Notting Hill VIC 3168
t (61-3) 9574 3200 - www.au.sgs.com

Certificate AU14/4487, continued

CPB Contractors Pty Limited

ISO 14001:2015

Issue 13
Sites
Business Unit Operation
CPB Contractors Pty Limited Level 18, 177 Pacific Highway North Sydney, NSW 2060, Australia
CPB Contractors Pty Limited Level 2, 177 Pacific Highway, North Sydney, NSW 2060, Australia
CPB Contractors Pty Limited Level 6, 567 Collins Street, Melbourne, VIC 3000, Australia
CPB Contractors Pty Limited Level 6, HQ South Tower, 520 Wickham Street, Fortitude Valley, QLD 4006, Australia
CPB Contractors Pty Limited 202 Pier Street, Perth, WA 6000, Australia
CPB Contractors Pty Limited Level 1, 167 Denham Street, Townsville, QLD 4810, Australia
CPB Contractors Pty Limited 136 Frome Street, Adelaide, SA 5000, Australia
CPB Contractors Pty Limited Level 2, 19 Hargreaves Street, Auckland, 1011, New Zealand
CPB Contractors Pty Limited 14-64 Industrial Avenue, Bohle, QLD 4818, Australia
Plant Facilities
CPB Contractors Pty Limited 8a Hereford Street, Berkeley Vale, NSW 2261, Australia
CPB Contractors Pty Limited 67 Bernoulli Street, Darra, QLD 4076, Australia
CPB Contractors Pty Limited 158 Cherry Lane, Laverton North, VIC 3026, Australia

Certificate AU14/4487, continued

CPB Contractors Pty Limited

ISO 14001:2015

CPB Contractors Pty Limited 19-21 Casino Street, Welshpool, WA 6106, Australia
Pre-cast facility CPB Contractors Pty Limited Corner Engineering & Industrial Drive, North Boambee, NSW 2450, Australia

Appendix B: Environmental Roles and Responsibilities

Listed project-specific roles, after responsibilities in Part B have been assigned

		Project Manager	Project	Engineering	Engineers	Construction	Supervisors	Line Manager	HR Manager	Commercial	Comm & S'hold	H&S Manager	Other positions
Element 1:	**Leadership, Accountability and Culture**												
1.1.	Environmental accountabilities, roles and responsibilities for managers, staff, employees and subcontractors are clearly defined, documented and communicated		C					C	R				
1.2.	Environmental leadership and commitment are demonstrated through measurable participation in environmental management	R	C				C	C					
1.3.	Environmental expectations are clearly defined with appropriate reward and disciplinary processes in place.	R	C					C					
Element 2:	**Planning**												
2.1.	Adequate resources are provided to effectively implement the EMP	R	C						C	C			
2.2.	Business systems are defined and established		R										
2.3.	**Error! Reference source not found.**		R										
Element 3:	**Legal and Other Requirements**												
3.1.	Relevant legal, contractual and other requirements are identified and maintained in a legal and other obligations register	C	R										
3.2.	All necessary environmental approvals are obtained prior to commencing relevant works and surrendered on completion	C	R		C								
3.3.	Work is planned and executed to ensure compliance		C	C	C	R	C						
3.4.	Inspections, observations and monitoring are performed		C		C		R						
3.5.	All non-compliances are recorded and corrective/preventative actions implemented.		R										
3.6.	All energy and greenhouse data are collected and entered into JDE	C	R							C			
3.7.	Personnel on the site have access to current versions of relevant legislation, standards and codes of practice		C										R
Element 4:	**Risk and Opportunity Management**												
4.1.	Systematic processes are implemented for identifying environmental risks and opportunities at all stages of the Project	R	C	C	C		C						
4.2.	Identified risks and opportunities are evaluated according to agreed criteria and recorded	R	C		C								C
4.3.	Environmental controls appropriate to the level of risk are identified, documented and implemented	C	C		C								R
4.4.	Feasible opportunities are implemented	R											C
4.5.	Identified environmental risks and controls are communicated to all relevant personnel	R	C		C		C		C			C	
4.6.	**Error! Reference source not found.**	C	R		C		C						
4.7.	Environmental risks and controls are regularly reviewed.	R	C		C								
Element 5:	**Change Management**												
5.1.	Changes to planned operations that have potential environmental consequences are identified	R	C	C	C		C						
5.2.	Risks associated with identified changes are assessed and controlled before changes are implemented	R	C				C						C
5.3.	All changes with environmental consequences are authorised before they are implemented	R		C		C	C						
5.4.	Controls associated with change are communicated to all affected personnel						C						R
Element 6:	**Communication and Consultation**												
6.1.	External Environmental stakeholders are identified		C								R		
6.2.	Relationships with external stakeholders are effectively managed		R								C		
6.3.	Internal consultative forums are established with regular meetings scheduled, conducted, documented and communicated	R	C								C	C	
6.4.	Environmental complaints and enquiries are recorded and responded to appropriately	C	C								R		
6.5.	The effectiveness of internal and external stakeholder engagement is evaluated and improved.	R	C								C	C	
Element 7:	**Training and Competency**												

	Project Manager	Project	Engineering	Engineers	Construction	Supervisors	Line Manager	HR Manager	Commercial	Comm & S' hold	H&S Manager	Other positions
7.1. All personnel have completed an induction containing relevant environmental information before they are authorised to work on the Project		R						C			C	
7.2. A training matrix is developed and documented		R						C				
7.3. Personnel are trained and assessed according to the training plan	R	C						C				
7.4. Training records are maintained and accessible to relevant personnel.		C						R				
Element 8: Subcontractor Relationships												
8.1. Selection processes ensure that subcontractors meet CPB Contractors' minimum environmental requirements		C		C					R			
8.2. Planning requirements of all subcontractor work scopes are completed and communicated prior to commencing work		C		R					C			
8.3. Compliance requirements for high risk environmental activities are identified and enforced		C		R					C			
8.4. Subcontractor documentation is submitted and reviewed to meet Project requirements		R		C					C			
8.5. Changes to the scope of work are managed as a Project change				C					R			
8.6. Subcontractors actively participate in environmental management and training on the Project		C		C					R			C
8.7. Subcontractors are reviewed to assess their performance and compliance with our minimum environmental requirements.		R		C		C						
Element 9: Incident Management												
9.1. All incidents are followed by appropriate response and notification	R	C		C		C				C		
9.2. All incidents are entered and managed in Synergy	C	R										
9.3. Incident investigations are conducted appropriate to the type of incident	R	C		C		C						
9.4. All personnel conducting incident investigations are trained to competently perform the task	R											
9.5. Corrective and preventive actions are taken after incidents and lessons are shared with other projects	R	C										
9.6. Repeat incidents are regularly reviewed by the project management team	C	R										
Element 10: Emergency Planning and Response												
10.1. Potential emergencies are identified using a formal risk assessment process	R	C										
10.2. Emergency response plans and procedures are developed and regularly reviewed	R	C									C	
10.3. Adequate resources are provided to effectively implement emergency response plans and procedures	R	C									C	
10.4. Environmental emergency response drills are conducted	R	C									C	
10.5. Employees, contractors and visitors are given appropriate emergency response training.		C						R			C	
Element 11: Document and Record Management												
11.1. Current versions of all relevant documents and records are available and controlled.	C	R										
11.2. Relevant documents and records will be maintained using corporate business applications and systems	R											
Element 12: Auditing, Review and Improvement												
12.1. Environmental performance trends are identified, and corrective actions are implemented as required	R	C										
12.2. A monthly environmental report is produced and distributed	C	R										
12.3. Regular management reviews are conducted to determine the continuing suitability, adequacy and effectiveness of the Environmental Management	R	C										C
12.4. Audits are undertaken to ensure compliance with the requirements of the EMP	R	C										C
12.5. All audits are undertaken by suitably qualified and experienced personnel												R

R = Responsible, **C** = Key Contributor

Appendix C1: SSDA Matrix

SSDA Compliance Monitoring and Reporting Program
Draft 07.02.23

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
	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	Note				
	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) generally in accordance with the EIS and Response to Submissions; (d) in accordance with the approved plans in the table below	Note				
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; (b) any reports, reviews or audits commissioned by the Planning Secretary regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	Note				
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). In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2(c), the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.	Note				
	Limits of Consent					
A5	This consent lapses five years after the date of consent unless work is physically commenced	Note				
	Prescribed Conditions					
A6	The Applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation	Note				
	Planning Secretary as Moderator					
A7	In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Note				
	Evidence of Consultation					
A8	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 for information or 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	Note				
	Staging					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
A9	The project may be constructed and operated in stages. Where compliance with conditions is required to be staged due to staged construction or operation, a Staging Report (for either or both construction and operation as the case may be) must be prepared and submitted to the satisfaction of the Planning Secretary. The Staging Report must be submitted to the Planning Secretary no later than one month before the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one month before the commencement of operation of the first of the proposed stages of operation).	CPB	Urgent	HI/ TT to engage planning consultant as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide a staging report		CPB to Engage - CPB's entitelment for Variation to be assessed by TT.
A10	A Staging Report prepared in accordance with condition A9 must: (a) if staged construction is proposed, set out how the construction of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of the project will be staged, including details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); (c) specify how compliance with conditions will be achieved across and between each of the stages of the project; (d) specify how compliance with independent auditing requirements will be achieved across and between each of the operational stages of the project; and (e) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	CPB	Urgent	HI/ TT to engage planning consultant as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide a staging report		Refer to A9
A11	Where a Staging Report is required, the project must be staged in accordance with the Staging Report, as approved by the Planning Secretary.	Note				
A12	Where construction or operation is being staged in accordance with a Staging Report, the terms of this consent that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage as identified in the Staging Report including independent auditing requirements.	Note				
	Staging, Combining and Updating Strategies, Plans or Programs					
A13	The Applicant may: (a) prepare and submit any strategy, plan (including management plan, architectural or design 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 (including management plan, architectural or design plan) or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan (including management plan, architectural or design plan) or program); (b) combine any strategy, plan (including management plan, architectural or design plan), or program required by this consent (if a clear relationship is demonstrated between the strategies, plans (including management plan, architectural or design plan) or programs that are proposed to be combined); and (c) update any strategy, plan (including management plan, architectural or design plan), or program required by this consent (to ensure the strategies, plans (including management plan, architectural or design plan), or 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).	Note				
A14	Any strategy, plan or program prepared in accordance with condition A13, where previously approved by the Planning Secretary under this consent, must be submitted to the satisfaction of the Planning Secretary.	Note				
A15	If the Planning Secretary agrees, a strategy, plan (including management plan, architectural or design 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.	Note				
A16	Updated strategies, plans (including management plan, architectural or design plan), or programs supersede the previous versions of them and must be implemented in accordance with the condition that requires the strategy, plan, program or drawing.	Note				
	Structural Adequacy					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
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. Notes: - Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development. - Under section 21 of the Coal Mine Subsidence Compensation Act 2017, the Applicant is required to obtain the Chief Executive of Subsidence Advisory NSW's approval before carrying out certain development in a Mine Subsidence District.	CPB	Note	CPB responsible for New Structure HI/ TT responsible for Existing Structure	*Contract document A15 says note*	CPB to adjust comment to note: CPB responsible for the scope of work under the GC21 contract.
	External Walls and Cladding					
A18	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	CPB	Note	Main Works Contractor responsible for New External Walls and Cladding areas HI/ TT responsible for Existing Walls and Cladding areas	*Contract document A16 says note*	CPB to adjust comment to note: CPB responsible for the scope of work under the GC21 contract.
	External Materials					
A19	The external colours, materials and finishes of the buildings must be consistent with the approved plans referenced in Condition A2. Any minor changes to the colour and finish of approved external materials may be approved by the Certifier provided: (a) the alternative colour/material is of a similar tone/shade and finish to the approved external colours/building materials; (b) the quality and durability of any alternative material is the same standard as the approved external building materials; and (c) a copy of any approved changes to the external colours and/or building materials is provided to the Planning Secretary for information	CPB				
	Applicability of Guidelines					
A20	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.	Note				
A21	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	Note				
	Monitoring and Environmental Audits					
A22	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, Site audit report 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.	Note	check tender clarification - Adam	As referenced in tender matrix		
	Access to Information					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
A23	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, 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) regular reporting on the environmental performance of the development in accordance with the reporting arrangements 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) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; (x) any other matter required by the Planning Secretary; and (b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	CPB/ HI/ TT		CPB to provide information to HI/ TT to upload to the Project Website		CPB to provide the documents TT to check with HI regarding responsibilty tp upload documentation
	Compliance					
A24	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	Note				
	Incident Notification, Reporting and Response					
A25	The Planning Secretary must be notified through the major projects portal 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.	CPB/ HI/ TT		CPB to provide information to HI/ TT to upload to the Project Website		Refer to A23
A26	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 2.	Note				
	Non-Compliance Notification					
A27	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	CPB/ HI/ TT		CPB to provide information to HI/ TT to upload to the Project Website		Refer to A23
A28	The 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	Note				
A29	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Note				
	Revision of Strategies, Plans and Programs					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
A30	Within three months of: (a) the submission of an incident report under condition A26; (b) the submission of an Independent Audit under condition C40 or C42; (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 A3 which requires a review, the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	CPB/ HI/ TT		CPB to provide information to HI/ TT to upload to the Project Website		Refer to A23
A31	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) 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	Note				
	PART B PRIOR TO COMMENCEMENT OF CONSTRUCTION					
	Notification of Commencement					
B1	The Applicant must notify the Planning Secretary in writing of the dates of the intended commencement of construction at least 48 hours before those dates	CPB				
B2	If the construction of the development is to be staged, the Planning Secretary must be notified in writing at least 48 hours before the commencement of each stage, of the date of commencement and the development to be carried out in that stage	CPB/ HI/ TT	Urgent	CPB to provide information to HI/ TT to upload to the Project Website		Refer to A23
	Certified Drawings					
B3	Prior to the commencement of construction, the Applicant must submit to the satisfaction of the Certifier structural drawings prepared and signed by a suitably qualified practising Structural Engineer that demonstrates compliance with this development consent	CPB				
	External Walls and Cladding					
B4	Prior to the commencement of façade construction, 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. 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	CPB				
	Pre-Construction Dilapidation Report – Protection of Public Infrastructure					
B5	Prior to the commencement of construction, the Applicant must: (a) consult with the relevant owner and provider of services and infrastructure that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a Pre-Construction Dilapidation Report identifying the condition of all public (non-residential)infrastructure and assets in the vicinity of the site (including roads, gutters and footpaths) that have potential to be affected; (c) submit a copy of the Pre-Construction Dilapidation Report to the asset owner, Certifier and Council; and (d) provide a copy of the Pre-Construction Dilapidation Report to the Planning Secretary when requested	CPB				
	Pre-Construction Survey – Adjoining Properties					
B6	Prior to the commencement of any construction, the Applicant must offer a pre-construction survey to owners of buildings that are likely to be impacted by the development.	CPB				
B7	Where the offer for a pre-construction survey is accepted (as required by condition B6), the Applicant must arrange for a survey to be undertaken by a suitably qualified and experienced expert prior to the commencement of vibration generating works that could impact on the identified buildings.	CPB				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
B8	Prior to the commencement of any vibration generating works that could impact on the buildings surveyed as required by condition B7, the Applicant must: (a) provide a copy of the relevant survey to the owner of each residential building surveyed in the form of a Pre-Construction Survey Report; (b) submit a copy of the Pre-Construction Survey Report to the Certifier; and (c) provide a copy of the Pre-Construction Survey Report to the Planning Secretary when requested.	CPB				
	Ecologically Sustainable Development					
B9	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate to the Certifier that the ESD initiatives recommended by the ESD report (Ref. ESD SSDA SEARs Report, Revision 02, prepared by LCI and dated 11/11/2021) have been incorporated into the design of the development.	CPB		CPB to cross reference the ESD report against the CPB Greenstar points schedule		Further clarification is required from CPB CPB provide necessary advice to TT / HI to confirm to the Planning Secretary
B10	The project is to achieve compliance with section 2.5.6 of the Health Infrastructure Engineering Services Guidelines dated 6 August 2021 (including Design Guidance Note No. 058) by attaining a minimum of 60 points in accordance with the ESD Evaluation Tool.	CPB		Points responsibility as per the CPB Green Star Points Schedule provided in the tender response. LHD has responsibility for some points.		CPB to liaise and obtain agreement with LHD as appropriate
	Outdoor Lighting					
B11	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that outdoor lighting being installed within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	CPB				
	Demolition					
B12	Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier and Planning Secretary.	CPB				
	Existing Helipad / Helicopter Operations During Construction					
B13	Prior to the commencement of construction, helipad / helicopter operations at the hospital are to be reviewed by a suitably qualified and experienced aviation professional in consultation with relevant stakeholders. The review must consider the proposed construction methodology including plant and equipment to be used (including lighting and cranes) and recommend changes to the construction methodology and / or flight paths where required to ensure safe ongoing helicopter operations at the site. A report summarising the outcome of the review must be submitted to the Certifier.	CPB				
	Environmental Management Plan Requirements					
B14	Management plans required under this consent must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). Notes: • The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/major-projects/assessment/post-approval • The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.	CPB				
	Construction Environmental Management Pla					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
B15	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to, the following: (a) Details of: (i) hours of work; (ii) 24-hour contact details of site manager; (iii) temporary site office arrangement; (iv) management of dust and odour to protect the amenity of the neighbourhood; (v) stormwater control and discharge; (vi) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; and (vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (b) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; (c) Construction Traffic and Pedestrian Management Sub-Plan (see condition B16); (d) Construction Noise and Vibration Management Sub-Plan (see condition B17); and (e) Construction Waste Management Sub-Plan (see condition B18).	CPB				
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced person(s); (b) be prepared in consultation with Council and TfNSW; (c) detail: (i) measures to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; (ii) measures to ensure the safety of vehicles and pedestrians accessing adjoining properties where shared vehicle and pedestrian access occurs; (iii) heavy vehicle routes, access and parking arrangements; (iv) the swept path of the longest construction vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, in accordance with the latest version of AS 2890.2; and (v) arrangements to ensure that construction vehicles enter and leave the site in a forward direction unless in specific exceptional circumstances under the supervision of accredited traffic controller(s)	CPB				
B17	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: (a) be prepared by a suitably qualified and experienced noise expert; (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (c) describe the measures to be implemented to manage high noise generating works such as piling, in close proximity to sensitive receivers, including existing patient care buildings within the hospital campus; (d) include strategies that have been developed with stakeholders for managing high noise generating works; (e) describe the consultation undertaken to develop the strategies in condition B17(d); (f) include a complaints management system that would be implemented for the duration of the construction; and (g) include a program to monitor and report on the impacts and environmental performance of the development and the effectiveness of the implemented management measures in accordance with the requirements of condition B14.	CPB				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
B18	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following: (a) the recording of quantities, classification (for materials to be removed) and validation (for materials to remain) of each type of waste generated during construction and proposed use for materials to remain; (b) information regarding the recycling and disposal locations; and (c) confirmation of the contamination status of the development areas of the site based on the validation results.	CPB				
B19	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following: (a) minimise the impacts of earthworks and construction on the local and regional road network; (b) minimise conflicts with other road users; (c) minimise road traffic noise; and (d) ensure truck drivers use specified routes.	CPB				
	Construction Parking					
B20	Prior to the commencement of construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be provided to the Planning Secretary for information	CPB				
	Soil and Water					
B21	Prior to the commencement of construction, the Applicant must: (a) install erosion and sediment controls on the site to manage wet weather events; and (b) divert existing clean surface water around operational areas of the site.	CPB				
B22	Prior to the commencement of construction, erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'	CPB				
	Operational Noise – Design of Mechanical Plant and Equipment					
B23	Prior to installation of mechanical plant and equipment: (a) a detailed assessment of mechanical plant and equipment with compliance with the relevant project noise trigger levels as recommended in the Noise and Vibration Impact Assessment prepared by EMM and dated December 2021 must be undertaken by a suitably qualified person; and (b) evidence must be submitted to the Certifier that any noise mitigation recommendations identified in the assessment carried out under (a) have been incorporated into the design to ensure the development will not exceed the recommended project noise trigger levels identified in the Noise and Vibration Impact Assessment prepared by EMM and dated December 2021	CPB				
	Biodiversity					
B24	Prior to the commencement of construction, the number and classes of ecosystem credits and species credits (like-for-like) set out in the BAM Biodiversity Credit Report contained in Appendix H of the Biodiversity Development Assessment Report, prepared by Total Earth Care and dated November 2022 must be retired.	Note		Superseded by B26		
B25	The requirement to retire like-for-like ecosystem credits and species credits in condition B24 may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	CPB		CPB to pay the prescribed amount		
B26	Evidence of the retirement of credits in satisfaction of condition B24 or payment to the Biodiversity Conservation Fund in satisfaction of condition B25 must be provided to the Planning Secretary prior to commencement of construction	CPB/ HI/ TT		CPB to provide information to HI/ TT to upload to the Project Website		Refer to A23
	Operational Access and Service Vehicle Arrangements					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
B27	Prior to the commencement of construction of the new vehicle access, evidence of compliance of the design of the access arrangements with the following requirements must be submitted to the Certifier: (a) the swept path of the largest service vehicle entering and exiting the site in association with the new work, as well as manoeuvrability through the site, must be in accordance with the latest version of AS 2890.2.	CPB/ HI/ TT		CPB to provide swept path HI/ TT to provide largest service vehicle specification		Noted - information can be provided to CPB upon request
	Public Domain Works					
B28	Prior to the commencement of any footpath or public domain works, the Applicant must consult with Council and demonstrate to the Certifier that the streetscape design and treatment meets the requirements of Council, including addressing pedestrian management. The Applicant must submit documentation of approval for each stage from Council to the Certifier.	CPB				
	Site Contamination					
B29	Prior to the commencement of construction, the Applicant must engage a NSW EPA-accredited Site Auditor to provide advice throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI whether to engage "Senversa" or to request CPB to engage on behalf of the Principal ?
	Barber Avenue On-Street Parking					
B30	Prior to the commencement of the relevant road works on Barber Avenue: (a) on-street parking arrangements are to be redesigned and submitted to the Planning Secretary for approval demonstrating that the eastern most parallel on-street parking space on the southern side of Barber Avenue at its termination is wholly located within the road reservation; or (b) evidence is to be provided to the satisfaction of the Planning Secretary that a boundary adjustment or other agreement has been agreed to by Council and the Applicant in relation to the parking space not being wholly located within the road reserve.	HI/ TT	Urgent	HI/ TT to provide instruction to CPB if it requires CPB to carry out the redesign required to achieve this condition		TT to review and provide instruction to CPB Item will become CPB responsibility
B31	Prior to the commencement of the relevant road works on Barber Avenue, swept path plans are to be submitted to the Planning Secretary for approval demonstrating that vehicles can safely turnaround to access the three parallel parking spaces at the eastern end of Barber Avenue, unless the spaces are redesigned as 90 degree spaces to satisfy condition B30(a), in which case the swept path plans are not required.	HI/ TT	Urgent	HI/ TT to provide instruction to CPB if it requires CPB to carry out the redesign required to achieve this condition		TT to review and provide instruction to CPB Item will become CPB responsibility
B32	Prior to the commencement of the relevant road works on Barber Avenue, the two parallel on-street parking spaces within Barber Avenue between the new hospital entry and exit driveways are to be redesigned and constructed as four 90 degree spaces.	HI/ TT	Urgent	HI/ TT to provide instruction to CPB if it requires CPB to carry out the redesign required to achieve this condition		TT to review and provide instruction to CPB Item will become CPB responsibility
	Site Notice					
C1	A site notice(s) must be prominently displayed at the boundaries of the site during construction for the purpose of informing the public of project details and must satisfy the following requirements: (a) minimum dimensions of the site notice(s) must measure 841 mm x 594 mm (A1) with any text on the site notice(s) to be a minimum of 30-point type size; (b) the site notice(s) must be durable and weatherproof and must be displayed throughout the works period; (c) the approved hours of work, the name of the builder, Certifier, structural engineer, site/ project manager, the responsible managing company (if any), its address and 24-hour contact phone number for any inquiries, including construction/ noise complaint must be displayed on the site notice(s); and (d) the site notice(s) must be mounted at eye level on the perimeter hoardings/fencing and must state that unauthorised entry to the site is not permitted.	CPB				
	Operation of Plant and Equipment					
C2	All construction plant and equipment used on site must be maintained in a proper and efficient condition and operated in a proper and efficient manner.	CPB				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
	Demolition					
C3	Demolition work must comply with the demolition work plans required by Australian Standard AS 2601-2001 The demolition of structures (Standards Australia, 2001) and endorsed by a suitably qualified person as required by condition B12.	CPB				
	Construction Hours					
C4	Construction, including the delivery of materials to and from the site, may only be carried out between the following hours: (a) between 7am and 6pm, Mondays to Fridays inclusive; and (b) between 8am and 1pm, Saturdays. No work may be carried out on Sundays or public holidays.	CPB		The contract matrix states 7am to 5pm on Saturday FYI		
C5	Notwithstanding condition C4, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours: (a) between 7am and 8am, Saturdays; and (b) between 1pm and 5pm, Saturdays.	CPB				
C6	Construction activities may be undertaken outside of the hours in condition C4 and C5 if required: (a) by the Police or a public authority for the delivery of vehicles, plant or materials; or (b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or (c) where the works are inaudible at the nearest sensitive receivers; or (d) for the delivery, set-up and removal of construction cranes, where notice of the crane-relatedworks is provided to the Planning Secretary and affected residents at least seven days prior to the works; or (e) where a variation is approved in advance in writing by the Planning Secretary or her nominee if appropriate justification is provided for the works.	CPB				
C7	Notification of such construction activities as referenced in condition C6 must be given to affected residents before undertaking the activities or as soon as is practical afterwards	CPB				
C8	Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours: (a) 9am to 12pm, Monday to Friday; (b) 2pm to 5pm Monday to Friday; and (c) 9am to 12pm, Saturday.	CPB				
	Implementation of Management Plans					
C9	The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).	CPB				
	Construction Traffic					
C10	All construction vehicles (excluding site personnel vehicles) are to be contained wholly within the site, except if located in an approved on-street work zone, and vehicles must enter the site or an approved on-street work zone before stopping.	CPB				
	Hoarding Requirements					
C11	The following hoarding requirements must be complied with: (a) no third-party advertising is permitted to be displayed on the subject hoarding/ fencing; and (b) the construction site manager must be responsible for the removal of all graffiti from any construction hoardings or the like within the construction area within 48 hours of its application.	CPB				
	No Obstruction of Public Way					
C12	The public way (outside of any approved construction works zone) must not be obstructed by any materials, vehicles, refuse, skips or the like, under any circumstances.	CPB				
	Construction Noise Limits					
C13	The development must be constructed to achieve the construction noise management levels detailed in the Interim Construction Noise Guideline (DECC, 2009). All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the management and mitigation measures identified in the approved Construction Noise and Vibration Management Sub-Plan	CPB				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
C14	The Applicant must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site or surrounding residential precincts outside of the construction hours of work outlined under condition C4.	CPB				
C15	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of 'quackers' to ensure noise impacts on surrounding noise sensitive receivers are minimised.	CPB				
	Vibration Criteria					
C16	Vibration caused by construction at any residence or structure outside the site must be limited to: (a) for structural damage, the latest version of DIN 4150-3 (1992-02) Structural vibration - Effects of vibration on structures (German Institute for Standardisation, 1999); and (b) for human exposure, the acceptable vibration values set out in the Environmental Noise Management Assessing Vibration: a technical guideline (DEC, 2006) (as may be updated or replaced from time to time)	CPB				
C17	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C16.	CPB				
C18	The limits in conditions C16 and C17 apply unless otherwise outlined in a Construction Noise and Vibration Management Sub-Plan, approved as part of the CEMP required by condition B17 of this consent.	CPB				
	Tree Removal and Fauna Protection					
C19	For the duration of the construction works: (a) within one week prior to any removal of vegetation a pre-clearance survey is required to be undertaken by a qualified ecologist to identify, number and flag hollow-bearing trees and other habitat features such as nests or hollow logs proposed to be removed. The results of the pre-clearance survey are to be submitted to the Certifier to inform tree clearance protocols; (b) during any tree removal, an experienced and qualified ecologist is to be present to re-locateany displaced fauna that may be disturbed during this activity. All non-habitat vegetation is to be cleared first to allow appropriate space for the felling of habitat trees and retrieval of any fauna that may be present within habitat trees. Trees with hollows are to be lopped in such a way that the risk of injury or mortality to fauna is minimised, such as top-down lopping, with lopped sections gently lowered to the ground, or by lowering whole trees to the ground with the "grab" attachment of a machine. Any injured fauna is to be appropriately cared for and released on site when re-habilitated; (c) all trees on the site that are not approved for removal must be suitably protected during construction as per the recommendations of the Arboricultural Development Assessment Report (prepared by Moore Trees and dated 25 November 2021); (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater; and (e) mitigation measures outlined in Table 6-1 of the submitted Biodiversity Assessment Report by Total Earth Care dated November 2022 must be implemented.	CPB				
	Air Quality					
C20	The Applicant must take all reasonable steps to minimise dust generated during all works authorised by this consent.	CPB				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
C21	During construction, the Applicant must ensure that: (a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; (b) all trucks entering or leaving the site with loads have their loads covered; (c) trucks associated with the development do not track dirt onto the public road network; (d) public roads used by these trucks are kept clean; and (e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	CPB				
	Soil and Water					
C22	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'	CPB				
	Imported Fill					
C23	The Applicant must: (a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site; (b) keep accurate records of the volume and type of fill to be used; and (c) make these records available to the Certifier upon request	CPB				
	Disposal of Seepage and Stormwater					
C24	Adequate provisions must be made to collect and discharge stormwater drainage during construction to the satisfaction of Certifier. The prior written approval of Council must be obtained to connect or discharge site stormwater to Council's stormwater drainage system or street gutter	CPB		Tender matrix is for approval by EPA. CPB to confirm council requirements are no more onerous than the EPA's		Further clarification is required from CPB
	Emergency Management					
C25	The Applicant must prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes, for the duration of construction.	CPB				
	Stormwater Management System					
C26	Within three months of the commencement of construction, the Applicant must design an operational stormwater management system for the development and submit it to the satisfaction of the Certifier. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in Appendix G of the EIS, being Stormwater and Flooding Assessment SSDA SEARS Conditions Report and accompanying stormwater drawings, prepared by Meinhardt Bonacci and dated November 2021, were appropriate; (c) be in accordance with applicable Australian Standards; and (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines.	CPB				
	Aboriginal Cultural Heritage					
C27	Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by Comber Consultants and dated November 2021.	CPB				
	Unexpected Finds Protocol – Aboriginal Heritage					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
C28	In the event that surface disturbance identifies a new Aboriginal object: (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects; (c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS; (d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and (e) works may only recommence with the written approval of the Planning Secretary.	Note		Unexpected finds protocol		
	Unexpected Finds Protocol – Historic Heritage					
C29	If any unexpected archaeological relics are uncovered during the work, then: (a) all works must cease immediately in that area and notice is to be given to Heritage NSW and the Planning Secretary; (b) depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area as determined in consultation with Heritage NSW; and (c) works may only recommence with the written approval of the Planning Secretary.	Note		Unexpected finds protocol		
	Waste Storage and Processing					
C30	All waste generated during construction must be secured and maintained within designated waste storage areas at all times and must not leave the site onto neighbouring public or private properties.	CPB				
C31	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	CPB				
C32	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	CPB				
C33	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	CPB				
C34	The Applicant must ensure that the removal of hazardous materials, particularly the method of containment and control of emission of fibres to the air, and disposal at an approved waste disposal facility is in accordance with the requirements of the relevant legislation, codes, standards and guidelines.	CPB				
	Outdoor Lighting					
C35	The Applicant must ensure that all external lighting is constructed and maintained in accordance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting.	CPB				
	Site Contamination					
C36	Remediation of the site must be carried out in accordance with the Remediation Action Plan prepared by JK Environments and dated 14 December 2021 and any variations to the Remediation Action Plan approved by an NSW EPA-accredited Site Auditor.	CPB				
C37	Where remediation is carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s)	CPB	Senversa	HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		This should be done by CPB as part of their works as appropriate
C38	If work is to be carried out / completed in stages, a NSW EPA-accredited Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice(s).	CPB	Senversa	HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		This should be done by CPB as part of their works as appropriate

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
C39	The Applicant must ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site that would result in significant contamination.	Note				
	Independent Environmental Audit					
C40	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI Planning
C41	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI Planning
C42	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements, upon giving at least 4 week's notice (or timing) to the Applicant of the date upon which the audit must be commenced.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI Planning
C43	In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C40 of this consent, or condition C42 where notice is given by the Planning Secretary; (b) submit the response to the Planning Secretary; and (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agree by the Planning Secretary.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI Planning
C44	Independent Audit Reports and the Applicant's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI Planning
C45	Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.	HI/ TT		HI/ TT to engage the site auditor as the SSDA Matrix tracker provided in the tender makes no mention of the need to provide this audit		TT to confirm with HI Planning
	PART D PRIOR TO COMMENCEMENT OF OPERATION					
	Notification of Occupation					
D1	At least one month before commencement of operation, the date of commencement of the operation of the development must be notified to the Planning Secretary in writing. If the 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, of the date of commencement and the development to be carried out in that stage	CPB				
	External Walls and Cladding					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
D2	Prior to commencement of operation, the Applicant must provide the Certifier with documented evidence that the products and systems 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	CPB				
D3	The Applicant must provide to the Planning Secretary a copy of the documentation given to the Certifier within seven days after the Certifier accepts it.	CPB				
	Works as Executed Plans					
D4	Prior to the commencement of operation, works-as-executed plans signed by a registered surveyor demonstrating that the stormwater drainage and finished ground levels have been constructed as approved, must be submitted to the Certifier. A copy ofthe works-as-executed plans shall be submitted to Penrith City Council's Engineering Department.	CPB				
	Warm Water Systems and Cooling Systems					
D5	The installation of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 1 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control –Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease.	CPB				
	Outdoor Lighting					
D6	Prior to the commencement of operation, the Applicant must submit evidence from a suitably qualified practitioner to the Certifier that demonstrates that installed lighting associated with the development achieves the objective of minimising light spillage to any adjoining or adjacent sensitive receivers and: (a) complies with the latest version of AS 4282-2019 - Control of the obtrusive effects of outdoor lighting (Standards Australia, 1997); and (b) has been mounted, screened and directed in such a manner that it does not create a nuisance to surrounding properties or the public road network.	CPB				
	Mechanical Ventilation					
D7	Prior to commencement of operation, the Applicant must provide evidence to the satisfaction of the Certifier that the installation and performance of the mechanical ventilation systems complies with: (a) AS 1668.2-2012 The use of air-conditioning in buildings – Mechanical ventilation in buildings and other relevant codes; and (b) any dispensation granted by Fire and Rescue NSW.	CPB				
	Operational Noise – Design of Mechanical Plant and Equipment					
D8	Prior to the commencement of operation, the Applicant must submit evidence to the Certifier that the noise mitigation recommendations in the assessment undertaken under condition B23 have been incorporated into the design of mechanical plant and equipment to ensure the development will not exceed the project noise trigger levels identified in the Noise and Vibration Impact Assessment prepared by EMM and dated December 2021.	CPB				
	Fire Safety Certification					
D9	Prior to commencement of occupation, a Fire Safety Certificate must be obtained for all the Essential Fire or Other Safety Measures forming part of this consent. A copy of the Fire Safety Certificate must be submitted to the relevant authority and Council. The Fire Safety Certificate must be prominently displayed in the building.	CPB				
	Structural Inspection Certificate					
D10	Prior to the commencement of occupation of the relevant parts of any new or refurbished buildings, a Structural Inspection Certificate or a Compliance Certificate must be submitted to the Certifier. A copy of the Certificate with an electronic set of final drawings (contact approval authority for specific electronic format) must be submitted to the Planning Secretary and the Council after: (a) the site has been periodically inspected and the Certifier is satisfied that the structural works is deemed to comply with the final design drawings; and (b) the drawings listed on the Inspection Certificate have been checked with those listed on the final Design Certificate/s.	CPB				
	Post-construction Dilapidation Report – Protection of Public Infrastructure					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
D11	Prior to the commencement of operation, the Applicant must engage a suitably qualified and experienced expert to prepare a Post-Construction Dilapidation Report. This Report must: (a) ascertain whether the construction works created any structural damage to public infrastructure by comparing the results of the Post-Construction Dilapidation Report with the Pre-Construction Dilapidation Report required by condition B5 of this consent; (b) have, if it is decided that there is no structural damage to public infrastructure, the written confirmation from the relevant public authority that there is no adverse structural damage to their infrastructure (including roads). (c) be submitted to the Certifier; (d) be forwarded to Council for information; and (e) be provided to the Planning Secretary when requested.	CPB				
	Repair of Public Infrastructure					
D12	Unless the Applicant and the relevant public 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 construction works; and/or (b) relocate, or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the development; and/or (c) pay compensation for the damage as agreed with the owner of the public infrastructure. Note: This condition does not apply to any damage to roads caused as a result of general road usage or otherwise addressed by contributions of this consent.	CPB				
	Road Damage					
D13	Prior to the commencement of operation, the cost of repairing any damage caused to Council or other Public Authority's assets in the vicinity of the Subject Site as a result of construction works associated with the approved development must be met in full by the Applicant	CPB				
	Post-Construction Survey – Adjoining Properties					
D14	Where a pre-construction survey has been undertaken in accordance with condition B7, prior to the commencement of operation the Applicant must engage a suitably qualified and experienced expert to undertake a post-construction survey and prepare a Post-Construction Survey Report. This Report must: (a) document the results of the post-construction survey and compare it with the pre-constructionsurvey to ascertain whether the construction works caused any damage to buildings surveyed in accordance with condition B7; (b) be provided to the owner of the relevant buildings surveyed; (c) be provider to the Certifier; and (d) be provided to the Planning Secretary when requested	CPB				
D15	Where the Post-Construction Survey Report determines that damage to the identified property occurred as a result of the construction works, the Applicant must repair, or pay the full costs associated with repairing the damaged buildings, within an agreed timeline between the owner of the identified property and the Planning Secretary. Alternatively, the Applicant may pay compensation for the damage as agreed with the property owne	CPB				
	Roadworks					
D16	Prior to the commencement of operation, the Applicant must complete the road upgrade works on Barber Avenue to the satisfaction of Council. The Applicant must obtain approval for the works under section 138 of the Roads Act 1993.	CPB		CPB to apply for the approval and carry out the works HI/ TT take approval risk responsibility		CPB to adjust comment to note: CPB responsible for the scope of work under the GC21 contract.
	Bicycle Parking and End-of-Trip Facilities					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
D17	Prior to the commencement of operation, compliance with the following requirements for secure bicycle parking and end-of-trip facilities must be submitted to the Certifier: (a) the provision of a minimum 140 bicycle parking spaces; (b) the layout, design and security of bicycle facilities must comply with the minimum requirements of the latest version of AS 2890.3:2015 Parking facilities - Bicycle parking, and be located in easy to access, well-lit areas that incorporate passive surveillance; (c) the provision of end-of-trip facilities for staff; and (d) appropriate pedestrian and cyclist advisory signs are to be provided. Note: All works/regulatory signposting associated with the proposed development shall be at no cost to the relevant roads authority.	CPB				
	Green Travel Plan					
D18	Prior to the commencement of operation, an updated Green Travel Plan (GTP) incorporating both Stage 1 and Stage 2 of the Nepean Hospital redevelopment, must be submitted to the Certifier to promote the use of active and sustainable transport modes and a copy be provided to the Planning Secretary for information. The plan must: (a) be prepared by a suitably qualified traffic consultant in consultation with Council and (Sydney Coordination Office) Transport for NSW; (b) include objectives and modes share targets (i.e. site and land use specific, measurable and achievable and timeframes for implementation) to define the direction and purpose of the GTP; (c) include specific tools and actions to help achieve the objectives and mode share targets; (d) include measures to promote and support the implementation of the plan, including financial and human resource requirements, roles and responsibilities for relevant employees involved in the implementation of the GTP; and (e) include details regarding the methodology and monitoring/review program to measure the effectiveness of the objectives and mode share targets of the GTP, including the frequency of monitoring and the requirement for travel surveys to identify travel behaviours of users of the development.	HI/LHD		As nominated in tender matrix provided		Further clarification is required from CPB
D19	Prior to the commencement of operation, the nominated employee(s) of the health services facility responsible for implementing the GTP and its ongoing review must be provided to Transport for NSW and the Planning Secretary for information.	HI/ TT				
	Utilities and Services					
D20	Prior to commencement of operation, 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.	CPB				
	Stormwater Operation and Maintenance Plan					
D21	Prior to the commencement of operation, a Stormwater Operation and Maintenance Plan (SOMP) is to be submitted to the Certifier. The SOMP must ensure the proposed stormwater quality measures remain effective and contain the following: (a) maintenance schedule of all stormwater quality treatment devices; (b) record and reporting details; (c) relevant contact information; and (d) Work Health and Safety requirements.	CPB				
	Signage					
D22	Prior to the commencement of operation, way-finding signage and signage identifying the location of staff car parking must be installed.	HI/LHD		As nominated in the tender matrix		Further clarification is required from CPB
D23	Prior to the commencement of operation, bicycle way-finding signage must be installed within the site to direct cyclists from footpaths to designated bicycle parking areas	CPB				
	Operational Waste Management Plan					

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
D24	Prior to the commencement of operation, the Applicant must prepare a Waste Management Plan for the development and submit it to the Certifier. The Waste Management Plan must: (a) detail the type and quantity of waste to be generated during operation of the development; (b) describe the handling, storage and disposal of all waste streams generated on site, consistent with the Protection of the Environment Operations Act 1997, Protection of the Environment Operations (Waste) Regulation 2014 and the Waste Classification Guideline (Department of Environment, Climate Change and Water, 2009); (c) detail the materials to be reused or recycled, either on or off site; and (d) include the Management and Mitigation Measures included in Nepean Hospital Stage 2 - Waste Management Plan prepared by MRA and dated 15 November 2021	CPB		CPB have made provision for MRA Consultants to complete the plan		
	Site Contamination					
D25	Prior to the commencement of operation, the Applicant must submit a Section A1 Site Audit Statement or a Section A2 Site Audit Statement accompanied by an Environmental Management Plan prepared by a NSW EPA accredited Site Auditor. The Section A1 or A2 Site Audit Statement must verify the relevant part of the site is suitable for the intended land use and be provided, along with any Environmental Management Plan to the Planning Secretary and the Certifier.	CPB				
	Landscaping					
D26	Prior to the commencement of operation, landscaping of the site must be completed in accordance with landscape plan(s) listed in condition A2(d).	CPB				
D27	Prior to the commencement of operation, the Applicant must prepare a Landscape Management Plan to manage the revegetation and landscaping on-site and submit it to the Certifier. The Plan must describe the ongoing monitoring and maintenance measures to manage revegetation and landscaping.	CPB				
	Private Infrastructure Works Adjacent to Barber Avenue					
D28	Prior to the commencement of operation, a revised design for the pedestrian ramp, retaining wall and stormwater pipe that encroach on the current Barber Avenue road reservation (the area shown hatched on plan ALL-00010123 – Barber Avenue Edited Design dated 15/11/22 and attached as Appendix 3 of this consent) is to be submitted to the Planning Secretary for approval. The revised design is to demonstrate that all private infrastructure is located within the hospital site unless evidence is submitted to the satisfaction of the Planning Secretary that Council has agreed to or granted approval/consent for the private infrastructure referred to above (or part thereof) to be constructed within Council land.	CPB		HI/ TT to provide instruction to CPB if it requires CPB to carry out the redesign required to achieve this condition		TT to review and provide instruction to CPB Item will become CPB responsibility
	PART E POST OCCUPATION					
	Operation of Plant and Equipment					
E1	All plant and equipment used on site must be maintained in a proper and efficient condition operated in a proper and efficient manner.	HI/ TT				
	Warm Water Systems and Cooling Systems					
E2	The operation and maintenance of warm water systems and water cooling systems (as defined under the Public Health Act 2010) must comply with the Public Health Act 2010, Public Health Regulation 2012 and Part 2 (or Part 3 if a Performance-based water cooling system) of AS/NZS 3666.2:2011 Air handling and water systems of buildings – Microbial control – Operation and maintenance and the NSW Health Code of Practice for the Control of Legionnaires' Disease	HI/ TT				
	Environmental Management Plan					
E3	Upon completion of remediation works, the Applicant must manage the site in accordance with the Environmental Management Plan approved by the Site Auditor (if any) under condition D25 and any on-going maintenance of remediation notice issued by EPA under the Contaminated Land Management Act 1997.	HI/ TT				
	Operational Noise Limits					
E4	The Applicant must ensure that noise generated by operation of the development does not exceed the noise limits in Noise and Vibration Impact Assessment prepared by EMM and dated December 2021.	HI/ TT				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
E5	The Applicant must undertake short term noise monitoring in accordance with the Noise Policy for Industry (2017) where valid data is collected following the commencement of use of each stage of the development. The monitoring program must be carried out by an appropriately qualified person and a monitoring report must be submitted to the Planning Secretary within two months of commencement use of each stage of the development or other timeframe agreed to by the Planning Secretary to verify that operational noise levels do not exceed the recommended noise levels for mechanical plant identified in Noise and Vibration Impact Assessment prepared by EMM and dated December 2021. Should the noise monitoring program identify any exceedance of the recommended noise levels referred to above, the Applicant is required to implement appropriate noise attenuation measures so that operational noise levels do not exceed the recommended noise levels or provide attenuation measures at the affected noise sensitive receivers	HI/ TT				
	Unobstructed Driveways and Parking Areas					
E6	All driveways, footways and parking areas must be unobstructed at all times. Driveways, footways and car spaces must not be used for the manufacture, storage or display of goods, materials, refuse, skips or any other equipment and must be used solely for vehicular and/or pedestrian access and for the parking of vehicles associated with the use of the premises	HI/ TT				
	Green Travel Plan					
E7	The updated Green Travel Plan required by condition D18 of this consent must be updated annually and implemented unless otherwise agreed by the Planning Secretary.	HI/ TT				
	Ecologically Sustainable Development					
E8	Unless otherwise agreed by the Planning Secretary, within six months of commencement of operation the Certifier and Planning Secretary are to be provided with a report from the Applicant by a suitably qualified and experienced expert demonstrating that the project attains the minimum number of ESD points as required by condition B10 of this consent.	HI/ TT				
	Outdoor Lighting					
E9	Notwithstanding condition D6, should outdoor lighting result in any residual impacts on the amenity of surrounding sensitive receivers, the Applicant must provide mitigation measures in consultation with affected landowners to reduce the impacts to an acceptable level.	HI/ TT				
	Landscaping					
E10	The Applicant must maintain the landscaping and vegetation on the site in accordance with the approved Landscape Management Plan required by condition D27 for the duration of occupation of the development.	HI/ TT				
	Hazards and Risk					
E11	The Applicant must store all chemicals, fuels and oils used on-site in accordance with: (a) the requirements of all relevant Australian Standards; and (b) the EPA's Storing and Handling of Liquids: Environmental Protection – Participants Manual' if the chemicals are liquids.	HI/ TT				
E12	In the event of an inconsistency between the requirements of condition E11(a) and E11(b), the most stringent requirement must prevail to the extent of the inconsistency	HI/ TT				
	Dangerous Goods					
E13	Dangerous goods, as defined by the Australian Dangerous Goods Code, must be stored and handled strictly in accordance with all relevant Australian Standards.	HI/ TT				
	Discharge Limits					
E14	The development must comply with section 120 of the POEO Act, which prohibits the pollution of waters.	HI/ TT				
	Stormwater Maintenance					
E15	The constructed stormwater structures and treatment measures must be maintained by the property owner in perpetuity.	HI/ TT				
	ADVISORY NOTES					
	General					
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.	Note				

ID	Compliance Requirement	Responsibility (Proposed by CPB)	Phase of Development	Comment (by CPB)	Evidence to be collected	T&T Comments 20/02/2023
	Long Service Levy					
AN2	For work costing $25,000 or more, a Long Service Levy must be paid. For further information please contact the Long Service Payments Corporation Helpline on 131 441.	CPB				
	Legal Notices					
AN3	Any advice or notice to the consent authority must be served on the Planning Secretary.	Note				
	Access for People with Disabilities					
AN4	The works that are the subject of this application must be designed and constructed to provide access and facilities for people with a disability in accordance with the BCA. Prior to the commencement of construction, the Certifier must ensure that evidence of compliance with this condition from an appropriately qualified person is provided and that the requirements are referenced on any certified plans.	CPB				
	Utilities and Services					
AN5	Prior to the construction of any utility works associated with the development, the Applicant must obtain relevant approvals from service providers.	CPB				
AN6	Prior to the commencement of above ground works written advice must be obtained from the electricity supply authority, an approved telecommunications carrier and an approved gas carrier (where relevant) stating that satisfactory arrangements have been made to ensure provisions of adequate services.	CPB/ HI/ TT		CPB to carry out works HI/ TT to engage carriers		Confirmation from the LHD noting that arragements have been made wih carriers. CPB - provision of services while working on the impacted service
	Road Design and Traffic Facilities					
AN7	All roads and traffic facilities must be designed to meet the requirements of Council or TfNSW (whichever is applicable). The necessary permits and approvals from the relevant road authority must be obtained prior to the commencement of road or pavement construction works.	CPB/ HI/ TT		CPB responsible for works within project boundary HI/ TT responsible for works outside of project boundary		CPB to adjust comment to note: CPB responsible for the scope of work under the GC21 contract.
	Road Occupancy Licence					
AN8	A Road Occupancy Licence must be obtained from the relevant road authority for any works that impact on traffic flows during construction activities.	CPB				
	SafeWork Requirements					
AN9	To protect the safety of work personnel and the public, the work site must be adequately secured to prevent access by unauthorised personnel, and work must be conducted at all times in accordance with relevant SafeWork requirements.	CPB				
	Hoarding Requirements					
AN10	The Applicant must submit a hoarding application to Council for the installation of any hoardings over Council footways or road reservation.	CPB				
	Handling of Asbestos					
AN11	The Applicant must consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction. The requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 – 'Transportation and management of asbestos waste' must also be complied with.	CPB				
	Fire Safety Certificate					
AN12	The owner must submit to Council an Annual Fire Safety Statement, each 12 months after the final Safety Certificate is issued. The certificate must be on, or to the effect of, Council's Fire Safety Statement.	CPB/HI/ TT				CPB 12 month DLP period; then reverts to LHD

Appendix C2: Environmental Risk Assessment

The risk assessment criteria has been developed in line with the CPB Management System (CMS). Qualitative measures are used to estimate the consequence or impact of an event, along with the estimate of likelihood, to produce consistent risk rankings across the identified risks using Steps 1 – 3 as outlined below.

Step 1 - What is the Most Credible Consequence?

Consequence Rating	1 Negligible	2 Minor	3 Moderate	4 Major	5 Substantial
Safety and Health	First Aid Treatment (or No treatment)	Medical Treatment Injury	Lost Time Injury	Permanent Injury (Paraplegia, Amputation)	Fatality (Single or multiple)
Environment and Heritage	Small, contained localised impact / Low level repairable damage	Short lived, well contained environmental impact / Minor remedial action required	Medium term, contained impact / Significant remedial action required	Impacts extend off-site / external ecosystem. Considerable remediation required	Lonr Term irreversible damage / Long Term Remediation required
Plant Damage	Little or No Damage	Damage less than $15,000	Damage between $15,000 and $50,000	Damage between $50,000 and $100, 000	Damage greater than $100, 000
Reputation	Brief local negative media coverage.	Local negative media coverage. Site or project problem.	Regional/short negative media coverage. Loss of Client / project.	Sustained national negative media coverage. Loss of long term key client.	International negative media coverage. Loss of business from key sector.
Time	Delay / Business interruption <1% of program days	Delay / Business interruption between 1%-3% of program days	Delay / Business interruption between 4%-6% of program days	Delay / Business interruption between 7%-10% of program days	Delay / Business interruption >10% of program days
Cost	Additional cost to the business / project <1% revenue	Additional cost to the business / project between 1%-3% revenue	Additional cost to the business / project between 4%-6% of revenue	Additional cost to the business / project between 7%-10% of revenue	Additional cost to the business / project >10% of revenue

Step 2 - What is the likelihood of that Consequence occurring in the circumstances?

Likelihood Ranking				
Score	Description		Percentage	Expected Frequency
5	Almost Certain	Common / Frequent Occurrence	Can be expected to occur 75% - 99%	More than 1 event per month
4	Likely	Is known to occur or "It has happened regularly"	Can quite commonly occur 50% - 75%	More than 1 event per year
3	Possible	Could occur or "I've heard of it happening"	May occasionally occur 25% - 50%	1 event per 1 to 10 years
2	Unlikely	Not likely to occur very often	May infrequently occur 10% - 25%	1 event per 10 to 100 years
1	Rare	Conceivable but only in exceptional circumstances	May occur in exceptional circumstances 0% – 10%	Less than 1 event per 100 years

Step 3 – Determine the Risk Level

Determine the risk score by combining most credilble consequence with likelihood

Likelihood / Consequence	Rating	Negligible	Minor	Moderate	Major	Substantial
		1	2	3	4	5
Almost Certain	5	5 (Low)	10 (Moderate)	18 (Very High)	23 (Extreme)	25 (Extreme)
Likely	4	4 (Low)	9 (Moderate)	17 (Very High)	20 (Very High)	24 (Extreme)
Possible	3	3 (Low)	8 (Moderate)	13 (High)	19 (Very High)	22 (Very High)
Unlikely	2	2 (Low)	7 (Low)	12 (High)	15 (High)	21 (Very High)
Rare	1	1 (Low)	6 (Low)	11 (Moderate)	14 (High)	16 (High)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E1	Environment	Planning Approvals and Licences	Non-Compliance with Regulatory instruments or Legislation (incl. Planning Approval conditions)	Inadequate management practices; Lack of competency/knowledge; Contractor management gaps	Regulatory action (prosecution, pins). Delay to subsequent approval requests, (delay to program) Contractual Breach Reputation Damage Non-compliance with sustainability certification	▪ Implementation of CEMP ▪ Induction included summary of regulatory obligations ▪ Supplier contracts included details of regulatory obligations ▪ Suitably qualified environment representative in delivery team	13 (High)
E2	Environment	Planning Approvals and Licences	Commencing work without approvals	Inadequate planning	Regulatory action (prosecution, pins). Delay to subsequent approval requests, (delay to program) Contractual Breach	▪ Approvals on master program ▪ Low impact / early works approval Procedure ▪ Change Management Procedure ▪ Suitably qualified environment representative in delivery team	13 (High)
E3	Environment	Planning Approvals and Licences	New approvals requirements due to scope change	New approvals requirements due to scope change	Regulatory action (prosecution, pins). Delay to subsequent approval requests, (delay to program) Contractual Breach	▪ Approvals on master program ▪ Low impact / early works approval Procedure ▪ Change Management Procedure ▪ Suitably qualified environment representative in delivery team (in design review)	11 (Moderate)
E4	Environment	Biodiversity and Ecology	Clearing or trimming without a permit, approval and/or pre-clearance survey	Inadequate management of environmental aspects; Lack of competency/knowledge	Regulatory action (prosecution, pins); Contractual Breach; Non-compliance with sustainability certification; Impact to existing flora and fauna communities	▪ Flora and Fauna Management Sub-Plan and Procedure ▪ Inductions included details of flora and fauna management requirements ▪ Toolbox training on management of flora and fauna during construction ▪ Site Environment Plans (SEP) ▪ Suitably qualified environment representative in delivery team ▪ Specialist consultant for Flora/ Fauna Management ▪ Tree report prepared by arborist required for all tree trimming or removal.	7 (Low)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E5	Environment	Biodiversity and Ecology	Damage to existing flora	Construction activities impacting existing vegetation due to poorly demarcated site	Regulatory action (prosecution, PINs) Breach of deed requirements Reputation Non-compliance with sustainability certification Impact to existing flora and fauna communities	▪ No-go fencing is to be installed and clearly defined on SEP ▪ Flora and Fauna Management Sub-Plan and Procedure ▪ Inductions included details of flora and fauna management requirements ▪ Toolbox training on management of flora and fauna during construction ▪ Trees to be retained to be protected in accordance with Australian Standard AS4970 (200–) - Protection of Trees on Development Sites and Adjoining Properties	7 (Low)
E6	Environment	Biodiversity and Ecology	Unexpected flora and fauna finds	Pre-clearance checks not undertaken Inadequate site delineation	Impact to flora and fauna communities	▪ Flora and Fauna Management Sub-Plan and Procedure ▪ Inductions included details of flora and fauna management requirements ▪ Toolbox training on management of flora and fauna during construction	3 (Low)
E7	Environment	Transport and Traffic	Changed traffic conditions in the neighbourhood or increased traffic	Traffic entering/leaving construction sites and compounds	Increased local traffic Changes to local traffic conditions Air quality impacts Noise impacts	▪ Construction Traffic Management Plan and TCP's ▪ Community Communications Strategy ▪ Project induction included Traffic management obligations ▪ Site Inductions and Truck Driver training included site specific requirements ▪ Road Act Approvals ▪ Air Quality Management Sub-Plan ▪ Construction Noise and Vibration Management Sub-Plan	9 (Moderate)
E8	Environment	Transport and Traffic	Increased heavy vehicles traffic	Haulage	Increased local traffic Changes to local traffic conditions Air quality impacts Noise impacts	▪ Construction Traffic Management Plan ▪ TCP's and VMPs ▪ Community Communications Strategy ▪ Road Act Approvals ▪ Air Quality Management Sub-Plan ▪ Construction Noise and Vibration Management Sub-Plan ▪ Site Inductions and Truck Driver training included site specific haulage routes	10 (Moderate)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E9	Environment	Transport and Traffic	Road closure - for heavy delivery	Heavy deliveries	Changes to local traffic conditions Increased local traffic Community complaints	▪ Construction Traffic Management Plan ▪ Community Communications Strategy ▪ Site Induction and tool box training included any requirements for road closure	9 (Moderate)
E10	Environment	Noise and Vibration	Unapproved works outside hours	Inadequate planning Not complying with the out of hours approval process and requirements	Regulatory action (prosecution, pins). Contractual Breach Reputation Community complaints	▪ Out of Hours Works on delivery program ▪ Construction Noise and Vibration Management Sub-Plan ▪ Construction Noise and Vibration Impact Statements (CNVIS) ▪ OOHW Procedure ▪ Induction included reference to obligations for management of OOHW ▪ Tool box training on management OOHW ▪ Suitably qualified environment representative in delivery team to assess and monitor	13 (High)
E11	Environment	Noise and Vibration	Cumulative / daytime construction noise	Construction activities not allowing for respite periods; Inadequate planning and consultation; Not complying with the noise management requirements	Community complaints Reputation	▪ Out of Hours Works on delivery program ▪ Construction Noise and Vibration Management Sub-Plan ▪ Construction Noise and Vibration Impact Statements (CNVIS) ▪ OOHW Procedure ▪ Induction included reference to obligations for management of noisy activities, standard working times and OOHW. ▪ Tool box training on management of noise and vibration ▪ Suitably qualified environment representative in delivery team to assess and monitor ▪ Community Communications Strategy	13 (High)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E12	Environment	Noise and Vibration	Vibration impacts of heavy plant	Heavy plant movements and activities Use of percussive machinery	Community complaints Damage to existing infrastructure Damage to heritage buildings	▪ Construction Noise and Vibration Management Sub-Plan ▪ Construction Noise and Vibration Impact Statements (CNVIS) ▪ Heritage Management Sub-Plan ▪ Induction included reference to obligations for vibration management ▪ Tool box training on management of vibration ▪ Suitably qualified environment representative in delivery team to assess and monitor vibration ▪ Community Communications Strategy	12 (High)
E13	Environment	Heritage and Archaeology	Unexpected archaeological finds	Unexpected find(s) Inadequate demarcation of site Location of known site(s) not referenced in site plans and communicated to personnel. Not following unexpected finds protocol	Delay to program Damage to relics	▪ Heritage Management Sub-Plan ▪ Unexpected Finds Heritage and Human Remains Procedure ▪ Inductions included reference to obligations with regard to unexpected finds ▪ Tool box training on management of unexpected finds ▪ Specialist consultant to manage unexpected finds	7 (Low)
E14	Environment	Soil and Water	Sediment run-off	Inadequate sediment control Not complying with sediment control plans	Pollution of water Impact on aquatic ecology Sedimentation of waterways Regulatory action Delay to program Community impacts	▪ Soil, Water and Groundwater Management Sub-Plan and associated Procedures ▪ Erosion and Sediment Control Plans ▪ Induction includes reference to obligations associated with management of spoil and water during construction ▪ Toolbox training on management of ERSED and de-watering ▪ Suitably qualified environment representative in delivery team ▪ Specialist consultant for ERSED development and review	13 (High)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E15	Environment	Soil and Water	Unapproved discharge of water from site	Poor planning of construction activity Not obtaining or working in accordance with an issued water discharge permit (as per de-watering procedure)	Pollution of water Impact on aquatic ecology Sedimentation of waterways Regulatory action Delay to program Community impacts	▪ Soil, Water and Groundwater Management Sub-Plan and associated Procedures ▪ Erosion and Sediment Control Plans ▪ Induction includes reference to obligations associated with management of spoil and water during construction ▪ Toolbox training on management of ERSED and de-watering ▪ Suitably qualified environment representative in delivery team	13 (High)
E16	Environment	Soil and Water	Unexpected finds of contaminated soil, hazardous materials or acid sulfate soils	Unexpected finds during construction activities Not following unexpected finds protocol	Additional cost for assessment and disposal Program delay Soil contamination from inadequate disposal	▪ Soil, Water and Groundwater Management Sub-Plan ▪ Unexpected Finds Soil Contamination and Asbestos Procedure ▪ Waste Management and Recycling Procedure ▪ Induction includes reference to obligations associated with management of waste, unexpected finds, contamination, acid sulfate soils and hazardous materials. ▪ Toolbox training on management of contamination and unexpected finds ▪ Suitably qualified environment representative in delivery team ▪ Specialist consultant for contamination management	7 (Low)
E17	Environment	Soil and Water	Chemical / hazardous materials storage and use	Unapproved use of materials on-site Inappropriate use or storage Inadequate storage and containment controls	Pollution of water Pollution of soil	▪ Project Health and Safety Management Plan ▪ Emergency Response Plan/Spill Management Procedure ▪ Site Environment Plans include designated storage areas ▪ Refuelling procedures ▪ Tool box training substance storage and management ▪ Induction reference substance storage obligations	12 (High)
E18	Environment	Soil and Water	Interception of ground water	Not following soil and water management plan Insufficient geotechnical data	Pollution of waters Delay to program Salinity impacts on infrastructure	▪ Soil, Water and Groundwater Management Sub-Plan and associated Procedures ▪ Induction included reference to groundwater management obligations ▪ Toolbox training delivered included management of Groundwater during construction	8 (Moderate)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E19	Environment	Visual Amenity	Visual impacts	Not cordoning off the worksite with fencing, shade cloth in accordance with contract requirements	Light pollution Temporary hoarding Graffiti	▪ Visual Amenity Management Sub-Plan ▪ Community Communications Strategy	7 (Low)
E20	Environment	Social and Economic Impacts	Local economy	Construction activities impacting local businesses	Impact on businesses Local employment	▪ Sustainability Management Plan ▪ Sustainable Workforce Target	7 (Low)
E21	Environment	Greenhouse Gas and Climate Change	Increased energy usage	Poor planning of construction activity Not following greenhouse gas management plans	Increased costs Increased greenhouse GHG emissions Contributing to climate change	▪ Sustainability Management Plan Construction programming	7 (Low)
E22	Environment	Air Quality	Dust generation	Poor planning of construction activity Not complying with the air quality, management plan, working in windy conditions, not covering loads Delays in stabilisation of disturbed land	Community impacts Regulatory action Air pollution	▪ Air Quality Management Sub-Plan and Procedures ▪ Water Management Procedures (for dust suppression) ▪ Induction includes air quality management requirements ▪ Toolbox Training of workforce on management of air quality during construction	8 (Moderate)
E23	Environment	Air Quality	Exhaust emissions	Poor planning of construction activity Not complying with the air quality management plan; Inadequate plant management	Community impacts Regulatory action Air pollution	▪ Air Quality Management Sub-Plan ▪ Induction included air quality management requirements ▪ Toolbox Training of workforce on management of air quality during construction;	7 (Low)

Risk ID	Category	Activity	Hazard/Aspect	Cause	Consequence /Impact	Current Controls	Risk Score
E24	Environment	Waste	Incorrect disposal of waste	Poor planning of construction activity Not following waste management plan	Regulatory action (prosecution, PINs)	▪ Waste and Recycling Management Sub-Plan and Procedures ▪ Induction included waste management requirements ▪ Toolbox training of workforce on waste management	8 (Moderate)
E25	**Environment**	Waste	Excess waste generation	Poor planning of construction activity Not following waste management plan	Non-compliance with sustainability certification	▪ Waste and Recycling Management Sub-Plan ▪ Sustainability Management Plan ▪ Induction included waste management requirements ▪ Toolbox training of workforce on waste management ▪ Waste reduction initiatives to be implemented as per the Sustainability Management Plan	7 (Low)
E26	**Environment**	Noise and Vibration	Settlement	Construction activities impacting on surrounding buildings structural integrity	Structural damage to surrounding buildings	▪ Pre construction building condition surveys ▪ Settlement monitoring ▪ Specialist consultant structural engineer engaged	11 (Moderate)

Appendix D: MIRRA Schedule

(Monitoring, Inspections, Reporting, Review, Audit) Schedule

MIRRA Schedule provided below.

Name	Detail	Frequency	By Whom	Resources
MONITORING				
Traffic	Visual observations of: ▪ Traffic control measures and their effectiveness; ▪ Access and egress points to ensure no dirt/debris is being tracked out;	Daily	Supervisor	Site diary
Weather	Check weather and rainfall forecasts.	Daily	Project Environment Representative	http://www.bom.gov.au/
Waste	Monitor and record the volumes of waste and the methods and locations of disposal.	Monthly	Project Engineer	Waste and Material Tracking Spreadsheet
Air quality	Visual monitoring for dust and vehicle emissions during non-remediation activities.	Daily	Supervisors	Site diary
Air quality (remediation)	▪ Airborne asbestos fibre monitoring; and ▪ Dust monitoring	Daily / Weekly	Remediation consultant	Monitoring reports
Noise monitoring (North & East Block)	Noise monitoring at the commencement of ripping work is recommended to determine if any further protection (or scheduling of works) is required to the operating suites/day surgeries in North and East Block.	Fortnightly	Project Environment Representative	Noise record sheet
Vibration	Unattended vibration monitoring is recommended at North & East Block.	During excavation, compaction and piling process.	Vibration consultant	Vibration monitoring reports
Energy use	Energy use and fuel consumption.	Monthly	Commercial	JDE
INSPECTIONS				
Site Inspection	Environmental zone inspections	Weekly	Project Environment Representative	Weekly Environmental Inspection Checklist
REPORTING				
Environmental Report	Detail on Environmental achievements, monitoring results, incidents, audit outcomes	Monthly	Project Environment Representative	As part of Monthly Project Report

Name	Detail	Frequency	By Whom	Resources
Waste	Total quantity of material purchased, the quantity purchased with recycled content, the total quantity of waste generated, the total quantity recycled, the total quantity disposed of and the method and location of disposal.	Every 2 months	Project Environment Representative	Waste and Material Tracking Spreadsheet
REVIEW				
EMP Review	Review of sub plans and Appendices	Quarterly	Project Environment Representative	EMP
Risk Register Review	Review risks in relation to changes to work activity onsite	Monthly	Project Environment Representative	Risk Register
Site Env Plan	Review site environmental controls in relation to work activity onsite to ensure reflective of site conditions	Fortnightly	Project Environment Representative	TBC
AUDIT				
CPB Contractors Internal SHEQ Audit	Review of EMP compliance to CPB Contractors EMS/ ISO14001		SHEQ Team	TBC

Appendix E: Construction Traffic and Pedestrian Management Sub-Plan

7th June 2023

Nepean Hospital Stage 2

Construction Traffic and Pedestrian Management Plan;

For: CPB

Site Address: **Great Western Highway, Kingswood**

Appendix F: Construction Noise & Vibration Management Sub-Plan

MATTHEW PALAVIDIS
VICTOR FATTORETTO
MATTHEW SHIELDS

Nepean Hospital Stage 2

Main Works Construction Noise and Vibration Management Sub Plan

SYDNEY
9 Sarah St
MASCOT NSW 2020
(02) 8339 8000

ABN 98 145 324 714
www.acousticlogic.com.au

Appendix G: Construction Waste Management Sub-Plan

Construction Waste Management Sub-Plan

Integrated Nepean Hospital – Stage 2 Main Works

Project number: N01074
Document number: NHR-CPB-MPL-PMP-TB2-PLN-000PP15

Document Approval

Rev.	Date	Prepared by	Reviewed by	Approved by	Remarks
A	07/06/2023	D.Borgia	R.Vranjesevic	Marc Van Heemst	
Signature:		7/6/23	9/6/23	13/06/23	

Appendix H: Arboriculture Development Assessment Report.

MOORE TREES

Consulting Arborist

19 June 2023

Mustafa Hedayat
Area Manager
CPB Contractors
Nepean Hospital
End of Barber Avenue
Kingswood, NSW, 2747

Site: Nepean Hospital Stage 2 redevelopment project

This Report has been commissioned by CPB Contractors Pty Limited. The Report concerns three (3) site trees (numbered as 227, 234 and 283) impacted by the proposed works and addresses additional information and updates as requested, due to design details that were not available for the original project Arborist Report. The subject trees are listed in Appendix 1, Tree Schedule for Nepean Hospital Stage 2 project.

1. Introduction: This project and associated documentation has been requested to be reviewed to assess:

- the impacts of the line of excavation upon the existing subject trees;
- location and type of stormwater infrastructure that will be appropriate within the existing site constraints;
- any pruning of tree branches, where branches are in contact with the new structure(s); and
- the proposed levels to achieve minimum offset requirements.

Recommendations have been made for these trees based on the project requirements and the current condition of the trees, taking into consideration surrounding trees and the project impacts.

enquiries@mooretrees.com.au www.mooretrees.com.au
M: 0411 712 887 P: 0242 680 425
PO Box 3114 Thirroul NSW 2515
ABN 90887347745

Appendix I: Pre-Demolition Hazardous Building Materials Survey

CPB Contractors Pty Ltd

Pre-Demolition Hazardous Building Materials Survey

Stage 2 – Heavy Demolition North Block
Nepean Hospital Redevelopment
Nepean Hospital, Derby Street,
Kingswood, NSW

31 October 2022

63096/ 148,109 (Rev B)

JBS&G Australia Pty Ltd

www.jbsg.com.au

Appendix J: Asbestos Management Plan

CPB Contractors Pty Ltd
Asbestos Management Plan (Buildings)

Nepean Hospital Redevelopment Stage 2
Kingswood NSW

9 September 2022

63096-147437 (Rev 0)
JBS&G

www.jbsg.com.au

Appendix K: Erosion and Sedimentation Control Plan

20th February 2023

Nepean Hospital Stage 2

Construction Soil and Water Management Plan;

For: CPB

Site Address: **Great Western Highway, Kingswood**

Appendix L: REMEDIATION ACTION PLAN

REPORT TO

HEALTH INFRASTRUCTURE C/-CBRE

ON

REMEDIATION ACTION PLAN

FOR

PROPOSED NEPEAN HOSPITAL STAGE 2 DEVELOPMENT

AT

NEPEAN HOSPITAL, DERBY STREET, KINGSWOOD, NSW

Date: 14 December 2021
Ref: E34236PLrpt4-RAP

JKEnvironments
www.jkenvironments.com.au

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JK Environments Pty Ltd
ABN 90 633 911 403

Appendix M: Biodiversity Report

total earth care

Stage 2 Redevelopment of Nepean Hospital

Biodiversity Development Assessment Report

November 2021