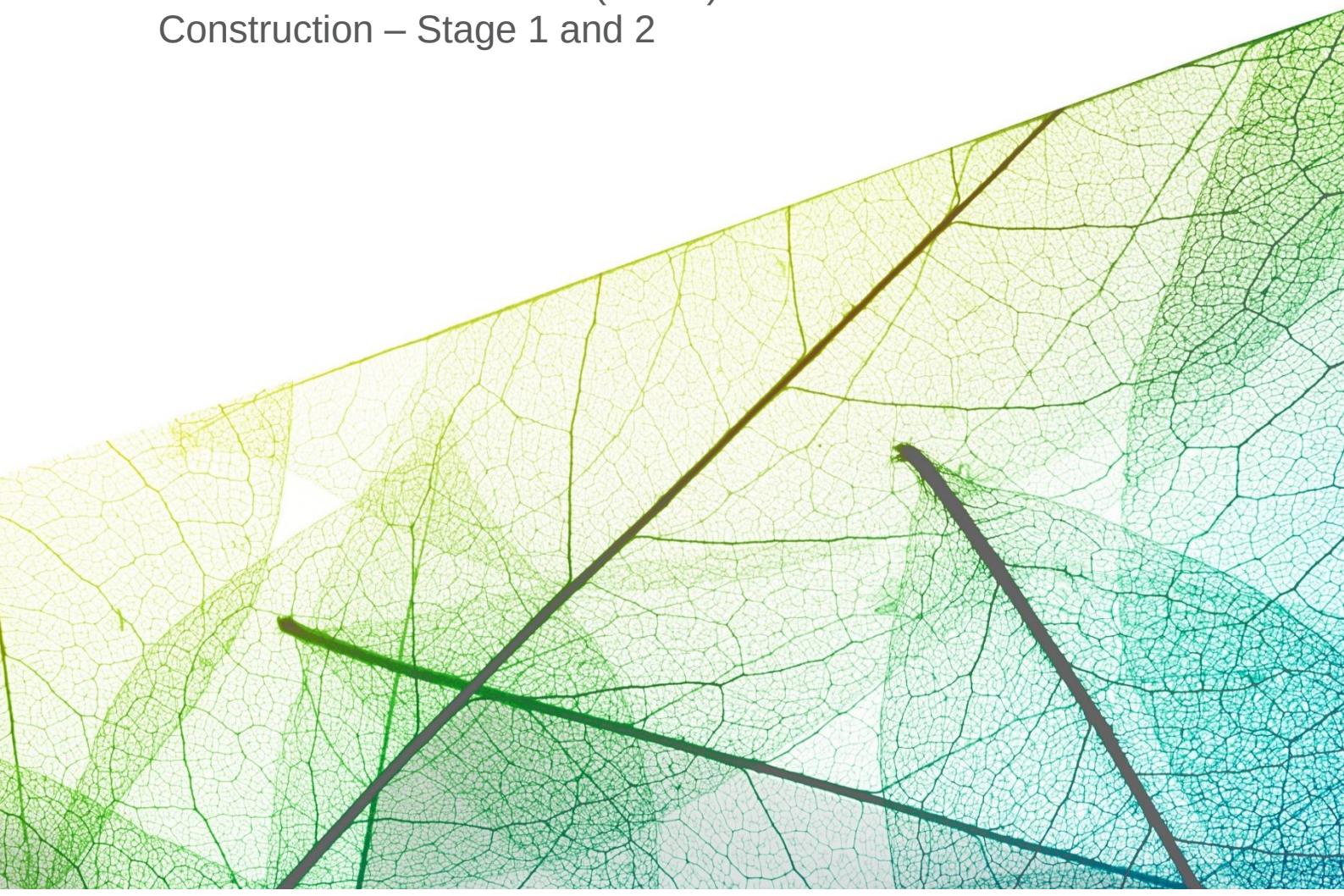
School Infrastructure New South Wales (SINSW)
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN
Fort Street Public School (FSPS)

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Fort Street Public School (FSPS)
Construction – Stage 1 and 2



DOCUMENT CONTROL

File Name	2306060_CEMP_FSPS_Revision F
Report Name	Construction Environmental Management Plan – Fort Street Public School
Revision	F

PLAN APPROVED BY

Lourise Khoury	Murray Graham	Tara Coffey
Operations Manager	**Site Manager**	**HS&E Manager**

REVISION STATUS

Rev	Date	Project	Prepared by	Checked by
A	15/01/2021	Construction Environmental Management Plan – Fort Street Public School	JDJD	APAP
B	15/02/2021	Construction Environmental Management Plan – Fort Street Public School – DRAFT MWO	JDJD	APAP
C	15/03/2021	Construction Environmental Management Plan – Fort Street Public School - MWO	PMCPMC	APAP
D	30/04/2021	Construction Environmental Management Plan – Fort Street Public School – FINAL SINSW comments	JD	AP
E	29/06/2022	Construction Environmental Management Plan – Fort Street Public School –Update Independent Audit	TM	NB
F	27/06/2023	Construction Environmental Management Plan – Fort Street Public School –Updated plan to include SSD Mod 1 & 2 reference and new site team details	LK	LK

EMP PREPARATION CHECKLIST	
REQUIREMENT	REFERENCE
Document preparation and endorsement	
Has the EMP been prepared in consultation with all relevant stakeholders as per the requirements of the conditions of consent? (Section 4.1)	Yes, refer to relevant consultation records in sub-plans
Have the views of the relevant stakeholders been taken into consideration? Have appropriate amendments been made to the EMP and does the EMP clearly identify the location of any changes? (Section 4.1)	Yes, refer to relevant consultation records in sub-plans
Has the EMP been internally approved by an authorised representative of the proponent or contractor? (Section 4.2)	Yes – Page 2
Version and content	
Does the EMP describe the proponent's Environmental Management System (EMS) (if any), and identify how the EMP relates to other documents required by the conditions of consent? (Section 3.5.1)	Yes – Section 4.0
Does the EMP include the required general content and version control information? (Section 3.1)	Yes – Pages 2 to 4
Does the EMP have an introduction that describes the project, scope of works, site location and any staging or timing considerations? (Section 3.2)	Yes – Sections 1.0 and 2.0
Does the EMP reference the project description? (Section 3.3) Does the EMP reference a Community and Stakeholder Engagement Plan (or similar) or include community and stakeholder engagement actions (if required)? (Section 3.4)	Yes – Section 3.0
Have all other relevant approvals been identified? Has appropriate information been provided regarding how each approval is relevant? (Section 4)	Yes – Section 4.4 and Appendix A
Has the environmental management structure and responsibilities been included? (Section 3.5.2)	Yes – Section 4.2 and Appendix B
Does the EMP include processes for training of project personnel and identify how training and awareness needs will be identified? (Section 3.5.3)	Yes – Section 4.5
Does the EMP clearly identify the relevant legal and compliance requirements that relate to the EMP? (Section 3.5.3)	Yes – Section 4.3 and Appendix A
Does the EMP include all the conditions of consent to be addressed by the EMP and identify where in the EMP each requirement has been addressed? (Section 3.5.13)	Yes – Section 1.2 and Appendix A

EMP PREPARATION CHECKLIST	
Have all relevant guidelines, policies and standards been identified, including details of how they are relevant? (Section 3.5)	Yes – Appendix A
Is the process that will be adopted to identify and analyse the environmental risks included? (Section 3.5.5)	Yes – Section 4.8
Have all the environmental management measures in the EIA been directly reproduced into the EMP? (Section 3.5.7)	Yes
Have any additional environmental management measures been included in the EMP? (Section 3.5.7)	No
Have environmental management measures been written in committed language? (Section 3.5.7)	Yes
Have project environmental management measures, including hold points, been identified and included? (Section 3.5.6)	Yes – Section 4.7
Are relevant details of environmental monitoring that will be carried out included? (Section 3.5.8)	Yes – Section 4.8
Have the components of any environmental monitoring programs been incorporated? (Section 3.5.8)	Yes – Section 4.8
Are environmental inspections included? (Section 3.5.9) Does the EMP document all relevant compliance monitoring and reporting requirements for the project? (Section 3.5.12 and 3.5.13)	Yes – Section 4.8
Does the EMP describe the types of plans or maps (such as environmental control maps) that will be used to assist with the management of environmental matters on site? (Section 3.5.10)	Yes – Figure 3
Does the EMP list environmental management documents? (Section 3.5.11)	Yes – Section 4.1 and Appendices
Is an auditing program referenced? (Section 3.5.13) Does the EMP include the incident notification and reporting protocols that comply with the relevant conditions of consent? (Section 3.5.15)	Yes – Section 4.8.6
Does the EMP identify the project role/position that is responsible for deciding whether an occurrence is an incident? (Section 3.5.15)	Yes – Annexure B
Does the EMP describe a corrective and preventative action process that addresses the requirements? (Section 3.5.16)	Yes – Section 4.8.7
Does the EMP include details of a review and revision process that complies with the requirements? (Section 3.6)	Yes – Section 10

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Appendices

Glossary

Term	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
AMU	Access Management Utility of the Department of Education
BCD	Biodiversity and Conservation Division
BOH	Back of House
CAR	Corrective Action Requests
CAR	Corrective Action Requests
CEMP	Construction Environmental Management Plan
CiDD	Certainty in Design and Delivery
CNVMSP	Construction Noise and Vibration Management Sub Plan
COLA	Covered Outdoor Learning Area
CSELR	City and South East Light Rail Project
CSWMSP	Construction Soil and Water Management Sub Plan
CTPMSP	Construction Traffic and Pedestrian Management Sub Plan
CWMSP	Construction Waste Management Sub Plan
DECC	NSW Department of Environment and Climate Change
DoE	Department of Education
DPIE	NSW Department of Planning, Industry and Environment
EEC	The Observatory Hill Environmental Education Centre
EES	NSW Environment, Energy and Science
EHS	Environment, Health and Safety
EMP	Environmental Management Plan
EMS	Environmental Management System
EPA	Environment Protection Authority
ESD	Ecologically Sustainable Development
FFE	Furniture Fittings and Equipment
FOMP	Friends of Millers Point

Term	Description
FSPS	Fort Street Public School
GMR	Lendlease Global Minimum Requirements for safety
IHRA	Impacts and Hazards Risk Assessment
LV	Low Voltage
MET	The Bureau of Meteorology Building or Building M located on the Fort Street School site
MPCRAG	Millers Point Community Resident Action Group
MWO	Main Works Offer
OEH	NSW Office of Environment and Heritage
OOC	Observations of Concern
OSD	On Site Detention tank
POEO Act	Protection of the Environment Operations Act 1997
RAP	Remediation Action Plan
RMS	Roads and Maritime Services
SINSW	School Infrastructure New South Wales
SSDA	State Significant Development Application
TfNSW	Transport for New South Wales

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

This CEMP sets out the processes and procedures to be established for the effective environmental management of the Fort Street Public School project in order to satisfy the consent conditions, legislative and compliance requirements for the project.

The scope of this plan encompasses the construction related activities of the development which will be undertaken in both stage 1 (demolition, earthworks, and hazardous materials removal) and stage 2 (construction of the remaining work on site) of the development.

1.2 OBJECTIVES

The objectives of this plan are to;

- Provide a clear and concise outline of the processes and procedures for effective environmental management,
- Form part of the Lendlease integrated Environment, Health and Safety Management System,
- To ensure compliance with relevant legislation and regulatory requirements;
- To monitor environmental impacts relating to the project as identified in this document and related sub plans;
- To be consistent with the elements of the Australian / New Zealand Standard 14001: 2015 – Environmental Management Systems (referred to as AS/NZS ISO 14001); and
- Satisfy the conditions of consent SSD-10340-Mod-1& SSD-10340-Mod-2 for the Fort Street Public School, Upper Fort Street, Millers Point dated 22 Dec 2021:
    - Modification 1 includes for the design changes to buildings, including relocation of the lift from the Meteorology Building to Building J and new trafficable rooftop above Building J, amendment to landscape design, external lighting, stormwater management system and access arrangements including changes to the Bradfield Services Tunnel Building, Upper Fort Street width and drop-off and pick-up arrangement.
    - Modification 2 includes for the design changes including lowering the finished floor level of Building G, Building H and Building J; minor façade changes associated with the lower finished floor levels; lowering the Building F envelope including floor levels, parapet height and adjacent external finished levels; increased height of the Building J lift shaft and overrun; and increased height of the lobby roof to stair 4 in Building J
- Specific relevant conditions are tabulated below;

Reference	Condition
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.
A26	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A
B16	Management plans required under this consent must be prepared in accordance with relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). Note: -The Environmental Management Plan Guideline is available on the Planning Portal at: https://www.planningportal.nsw.gov.au/majorprojects/assessment/post-approval

Reference	Condition
	-The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.
B17	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) management of dust and odour to protect the amenity of the neighbourhood; (iv) stormwater control and discharge; (v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site; (vi) groundwater management plan including measures to prevent groundwater contamination; (vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting; (viii) community consultation and complaints handling; (b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed; (c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure; (d) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site; (e) Construction Traffic and Pedestrian Management Sub-Plan (see condition B18); (f) Construction Noise and Vibration Management Sub-Plan (see condition B19); (g) Construction Waste Management Sub-Plan (see condition B20); and (h) Construction Soil and Water Management Sub-Plan (see condition B21).
B18	A 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 the Sydney Coordination Office within TfNSW; (c) be submitted to the Coordinator General, Transport within TfNSW for endorsement, unless otherwise agreed to in writing by the Planning Secretary; (d) include details of: (i) crane arrangement including the location of any crane(s); (ii) commitment to providing the site manager's direct contact number to business adjoining or impacted by the construction work, the Transport Management Centre and the Sydney Coordination office within TfNSW to resolve issues relating to traffic, public transport, freight, servicing and pedestrian access in real time; (iii) the predicted number of construction vehicle movements and detail of vehicle types, nothing that vehicle movements are to be minimised during peak periods; (iv) specific measures to ensure the arrival of construction vehicles to the site do not cause queuing on public roads; (v) a monitoring regime for maintaining the simultaneous operation of buses and construction vehicles on roads surrounding the site; (vi) measures to avoid construction worker vehicle movements within the Sydney Central Business District; (vii) cumulative construction impacts of projects including Sydney Metro City and South West with reference to the construction traffic and pedestrian management plans for developments within or around the development site to ensure that coordination of work activities is managed to minimise impacts on the surrounding road network; (viii) the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and light rail and bus services; and (ix) heavy vehicle routes, access and parking arrangements.

Reference	Condition
B19	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) identify the following: (i) noise and vibration objectives in the EPA's Interim Construction Noise Guideline (DECC, 2009); (ii) each work area, site compound and access route (private and public); (iii) specific activities that will be carried out and associated noise sources at the premises and access routes; (iv) high noise generating works, including location; and (v) potentially affected sensitive receivers; (c) an assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the objectives identified; (d) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009); (e) where the noise and vibration objectives are predicted to be exceeded an analysis of feasible and reasonable noise and vibration mitigation measures that can be implemented to reduce construction noise and vibration impacts; (f) describe the measures to be implemented to manage the high noise generating works identified, in close proximity to sensitive receivers; (g) include strategies that have been developed with the community for managing the identified high noise generating works; (h) describe the community consultation undertaken to develop the strategies in condition B19(g); (i) include a complaints management system that would be implemented for the duration of the construction; and (j) 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 B16.
B20	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the following: (a) detail the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations; and (b) 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 in accordance with the requirements of the relevant legislation, codes, standards and guidelines, prior to the commencement of construction.
B21	The Applicant must prepare a Construction Soil and Water Management Plan (CSWMSP) and the plan must address, but not be limited to the following: (a) be prepared by a suitably qualified expert, in consultation with Council; (b) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book'; (c) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilisation of the Site); (d) detail all off-Site flows from the Site; and (e) describe the measures that must be implemented to manage stormwater and flood flows for small and large sized events, including, but not limited to 1 in 5-year ARI.
B22	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.
C29	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). 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 EES Group and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and EES Group to develop and implement management strategies for all objects/sites. Works shall only recommence with the written approval of EES Group.
C30	Construction works must be carried out in accordance with the recommendations of Section 6 of the Aboriginal Cultural Heritage Assessment Report (ACHAR), prepared by Curio Projects Pty Ltd and dated 15 July 2020.

Reference	Condition
C31	If any unexpected archaeological relics are uncovered during the work, then all works must cease immediately in that area and the Heritage NSW contacted. 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 may only recommence with the written approval of the Heritage NSW.

Figure 1 – Applicable Consent Conditions

1.3 ENVIRONMENTAL, HEALTH AND SAFETY POLICY

Lendlease are committed to our vision 'to create the best places' through workplaces free of incident and injury wherever we have a presence, supported by an uncompromising culture which holds the health and safety of people and the protection of the environment as a key priority in all business reviews and decisions.

To achieve our vision, we are committed to:

- Setting objectives and measurable targets within the framework established by the EHS Management System for continual improvement, the protection of health and safety, the prevention of pollution and protection of biodiversity.
- Eliminating work related environment, health and safety (EHS) impacts and incidents associated with our operational construction activities, products and services.
- Complying with applicable legislation, codes of practice, compliance standards, obligations and guidelines.
- Defining roles, responsibilities and accountability for clarity, consistency and predictability across our workforce.
- Understanding the needs and expectations of workers and other parties; including suppliers, subcontractors, clients, the community and regulatory authorities; through partnerships and consultative forums.

2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

2.1.1 Property Identification Details

Fort Street Public School, Upper Fort Street, Millers Point
(Lots 106, 107 and 108 DP748340, Lots 2, 3, 4 and 9 DP732592, Lot 2 DP244444, Lot 5 DP258013)

School Code – 1937

2.1.2 Site description /Context

The Fort Street Public School is in a prominent location on Observatory Hill, adjacent to the Bradfield Highway (the approaches to the Harbour Bridge) and bounded by the Cahill Cut.

The school itself consists of exceptional and significant heritage items and is located between two exceptional heritage sites; the National Trust and the Sydney Observatory. The current Fort Street Public School was a part of original school on this site which was in what is now the National Trust Building and was one of the first public school to be opened in the colony of NSW.

The school is isolated from the rest of Observatory Hill by the Cahill Cut which was cut around the school site in the 1940's.

Fort Street Public School (FSPS) and the Observatory Hill Environmental Education Centre (EEC) require significant redevelopment to cater for increasing student demand, address essential site and facility upgrades and to provide a new and improved innovative learning environment for the next generation of students.

2.1.3 Site Heritage Overview

The site's heritage context is summarised by Curio Projects in their conservation management plan dated March 2020 as;

'The historical archaeological resource associated with the early buildings within the footprint of Fort Street Public School, the Military Hospital's surgeon's residence (later associated with the National School), the Observatory's Messenger's Cottage and associated buildings and facilities, have the potential to provide information regarding the lives of the people living and working at these early colonial institutions. Particular aspects of colonial Sydney would be demonstrated in the physical evidence of buildings and in an artefact assemblage of the detritus of everyday life discarded by military and medical personnel, teachers and students, and staff of the Observatory. An extensive artefact assemblage that may be present in wells, rubbish and / or cess pits would have the potential to provide an insight into lifestyles associated with the Military Hospital or Observatory that would contribute to substantive questions regarding institutional life in the colony. The historical archaeological resources within the footprint of Fort Street Public School have state significance'.

2.2 KEY PERSONNEL CONTACT DETAILS

The emergency contact details (24 hours 7 days a week) for key project personnel are included in the table below.

Role	Name	Contact Details
Site Manager	Adam Middleton	**Adam Middleton** Site Manager, User Experience, Building Level 14, Tower Three, International Towers Sydney Exchange Place, 300 Barangaroo Avenue Barangaroo NSW 2000 M +61 424 162 326 adam.middleton@lendlease.com
Senior Project Engineer	Michael Power	**Michael Power** Senior Project Engineer, User Experience, Construction Level 14, Tower Three, International Towers Sydney Exchange Place, 300 Barangaroo Avenue, Barangaroo NSW 2000 M +61 447 324 219 michael.power@lendlease.com
Operations Manager	Lourise Khoury	Northern Operations Manager, User Experience, Construction Level 14, Tower Three, International Towers Sydney Exchange Place, 300 Barangaroo Avenue Barangaroo NSW 2000 M +61 437 592 267 Lourise.Khoury@lendlease.com

2.3 SITE LOCATION PLAN

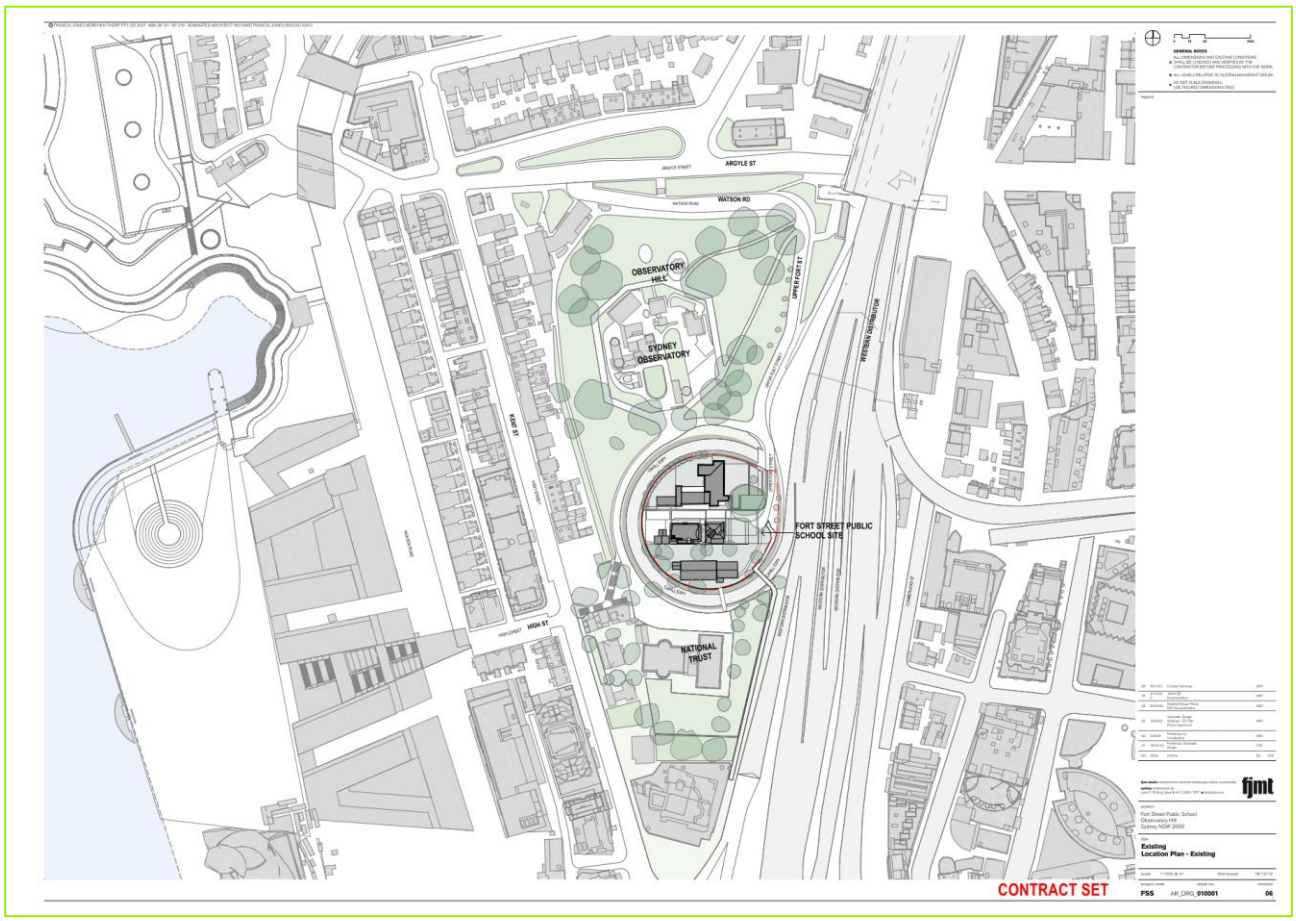


Figure 2 – Site Location Plan

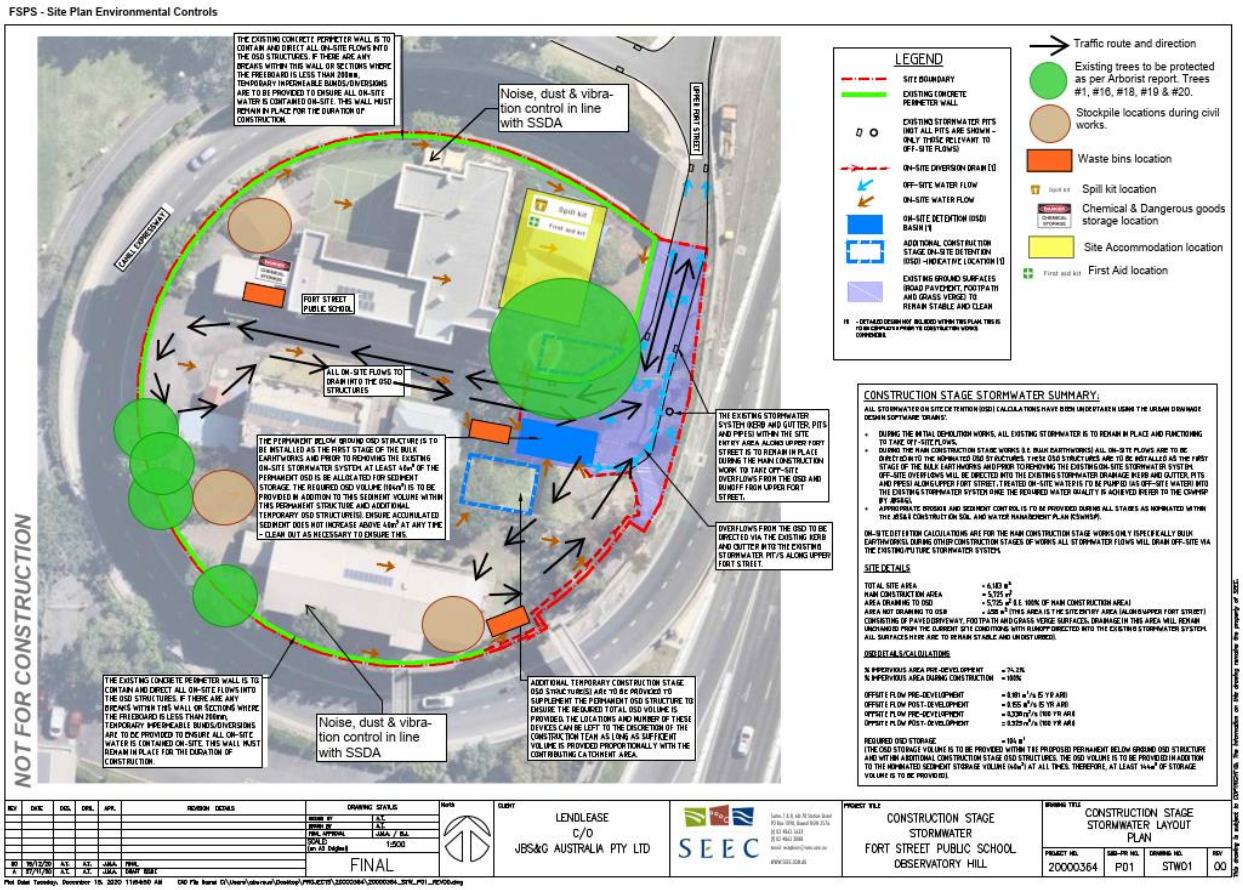


Figure 3 – Site Environmental Protection Measures

2.4 SCOPE OF WORKS

Redevelopment of Fort Street Public School comprising demolition of selected buildings and structures, construction of four new buildings, refurbishment of existing retained buildings, alterations to drop-off and pick-up arrangements and associated works, including tree removal, landscaping and consolidation of lots.

2.5 TIMING OF ACTIVITIES

2.5.1 Hours of Work

In accordance with the Conditions of Consent, the FSPS working hours will be;

(a) Monday to Friday: 7.00am – 6.00pm;

(b) Saturday: 8.00am – 1.00pm

(c) Sunday and public holidays: No work

(d) Out of hours: In accordance with SSDA conditions

Provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:

(a) Between 6pm and 7pm, Mondays to Fridays inclusive; and

(b) Between 1pm and 4pm, Saturdays.

In addition to regular working hours, there will be occasional short periods when out of hours works are required for example special deliveries, hoarding removal at project completion and services cutovers. The required Cahill Expressway shut down is foreseen as an after-hours activity and will be conducted in line with the authority approval.

Lendlease will agree the process with SINSW, Transport for New South Wales (TfNSW), Transport Management Centre (TMC), Roads and Maritime Services (RMS) and The City of Sydney Council to address the approvals and additional measures required prior to scheduling any out of hours works. The nature of these works may include dismantle of hoardings, works to footpaths, services connections, vent shaft works and other works that interface with the surrounding facilities.

2.5.2 Project Staging Methodology (Stage 1 & 2)

The SSD pertains to the delivery of the entire package of works. To maintain operational continuity throughout construction of the works and as a result of site access restrictions the works must be staged. An indicative 2 stage approach is proposed as follows;

(1) Stage 1 is the construction of site establishment and preparation, demolition works and hazardous materials removal, civil and remediation works, archaeological research excavation and heritage remediation works to the Meteorology building.

(2) Stage 2 is the construction of the remaining works on site and the handover and occupation of the buildings for its intended use

2.5.3 Stage 1

- Stage 1 - Demolition Works
- Stage 1 - Bulk Excavation and inground services

2.5.4 Stage 2

- Stage 2 - Structure
- Stage 2 - Facade
- Stage 2 – Sequencing – Building Services
- Stage 2 – Sequencing – Internal Works – Integrated fit Out & Finishes
- Stage 2 – Sequencing – Landscaping works & Handover

3.0 STAKEHOLDER ENGAGEMENT AND COMMUNITY

3.1 CONSULTINGCONSULTING AND COMMUNICATING

The approach to managing stakeholder consultation and communication for SSDA works for the FSPS Project is to create a strategic framework which enables a consistent and transparent guide to engaging stakeholders who are either interested or impacted by the works.

Lendlease manages stakeholder interests and expectations through early and ongoing engagement. Every member of the Lendlease Project Team is responsible for appropriate and effective stakeholder interactions.

The key principles which underpin our proposed approach are:

- Establish and maintain open and transparent communication channels with all key stakeholders to ensure they are accurately informed about the project;
- Tailor communications to provide the right information, to the right people at the right time;

- Ensure a proactive, rather than reactive approach to all potential stakeholder related issues and engagement; and
- Respect, involve and engage stakeholders to ensure their needs are recognised and considered at all stages of the project.

The Lendlease Stakeholder Management and Communications Plan supports the implementation of this CEMP. The planp outlines key stakeholder groups who are directly or indirectly impacted by works and their respective levels of interest in the project and has been coordinated with SINSW broader community stakeholder engagement plan for FSPS. Identified keyk stakeholder groups are outlined in the table below.

Category	Stakeholder Group	Key Parties
Client	NSW Department of Education (DoE)	. Sylvia Corish, ED School Performance . Glen Halliday, EEC Principal - DoE Teaching Principal
Current / future users	Fort Street Public School Principal and teaching staff	Michele Peele-Yates, Principal, DoE
Current / future users	Fort Street Public School Community	. Current students . Luke Lee, P&C Representative FSPS . Future students . Nearby public schools (Conservatorium HS, Ultimo Public School, Plunkett Street Public School)
Interest / action groups	. Millers Point Community Residents Action Group (MCRAG) and Friends of Millers Point	. John McInerney, Chair and ex. City of Sydney Councillor. . MCRAF represents Millers Point, Dawes Point, The Rocks and Walsh Bay residents . FoMP is a coalition of public figures, artists, art organisations, educators, social scientists, church and community leaders, business owners, residents, politicians (local, state and federal) and others. . Patrons are The Hon Anthony Albanese, Eva Cox, Jack Mundy, Reg Mombassa and Michael Kendrick. Convenor - Kelli Haynes/ Media - John Dunn
Interest / action groups	Walsh Bay Precinct Management Association (PMA)	The Hon (Laurie) Laurence Brereton (attends the PMA as well as sometimes the MCRAG meetings) - ex. State and Federal Minister (ALP)
Elected representatives	Lord Mayor of Sydney	. Clover Moore (IND) as well as councillors including Alex Greenwich (IND)

Category	Stakeholder Group	Key Parties
Elected representatives	Local Member of Parliament	Alex Greenwich, State Member for Sydney (Also works a lot with MCRAG and Walsh Bay Precinct Committee. Popular in the local community)
Elected representatives	Federal Member for Sydney	Tanya Plibersek MP (ALP)
Indigenous/ ethnic groups	Metropolitan Local Aboriginal Land Council	. Yvonne Weldon, Board Chair . Nathan Moran, CEO . Cadigal Aboriginal people (original custodians of Millers Point)
Government agencies / depts	RMS Roads	Western Distributor, Bradfield HSW/ Cahill Expressway
Government agencies / depts	Property NSW	Kim Russell, Asset and Leasing Manager, Portfolio Management Group
Government agencies / depts	Schools Infrastructure NSW (SINSW)	Richard Skinner, Director Education Leadership, DoE Port Jackson Access Management Utility (AMU), SINSW Rep present Esben Jensen, Community Engagement Manager Emma Marshall, New Learning Environments
Consultants	Schreiber Hamilton Architecture (SHAC)	Justin Hamilton, Architect Elizabeth Brown, Director
Consultants	FJMT	Elizabeth Carpenter, Managing Principal
Consultants	Root Partnership	DavidDavid Wiles, Associate Director Justine Newby, Senior Project Manager
Immediate neighbours	National Trust of Australia (SWG) / Sydney Observatory	. HQ for National Trust . Home to S.H. Ervin Gallery . Richard Silink, Deputy CEO . James Rongen-Hall, Exhibition Project Coordinator . Museum of Applied Arts & Sciences
Immediate neighbours	Hotel / holiday accommodation	The Langham Sydney (Kent Street)
Authorities	NSW office of Environment & Heritage (SWG) & NSW Heritage Council	Hendry Wan, Senior Heritage Officer

Category	Stakeholder Group	Key Parties
Local residents	Kent Street, Lower Fort Street, Upper Fort Street, Essex Street, Hickson Road, Argyle Place, Windmill Street	. Residential and commercial properties . Barangaroo team engages with the Kent Street building managers only . Tennis courts
Sport and recreation	King George V Rec Centre	City of Sydney
Sport and recreation	Abe Mott Community and Youth Centre	. City of Sydney . Community Centre worker (Sage) has been there are long time. Sage also does a lot of work for homelessness. Darren Tan, Community Development Manager, Lendlease Barangaroo South has engaged with her re. homelessness in the Sydney CBD.
Lendlease business units	LL Millers Point (Barangaroo South) Development	Darren Tan, Lendlease Community Development Manager, Barangaroo South and Crown, Lendlease Millers Point
Lendlease business units	Lendlease Property & Building Social Sustainability Senior Strategic Management Team	. Amanda Shaw, GM Social Sustainability Australia . Clare Baker, Senior Strategic Stakeholder Engagement Manager, Property & Building
Authorities	City of Sydney Exec & Officers	. Kim Woodbury, COO . Monica Barone, CEO
Media / social media	Local, city and state-wide print media and social media (Facebook, Instagram, etc.)	. SMH, Daily Tele, etc. . Millers Point Community Facebook . Save our Millers Point Facebook

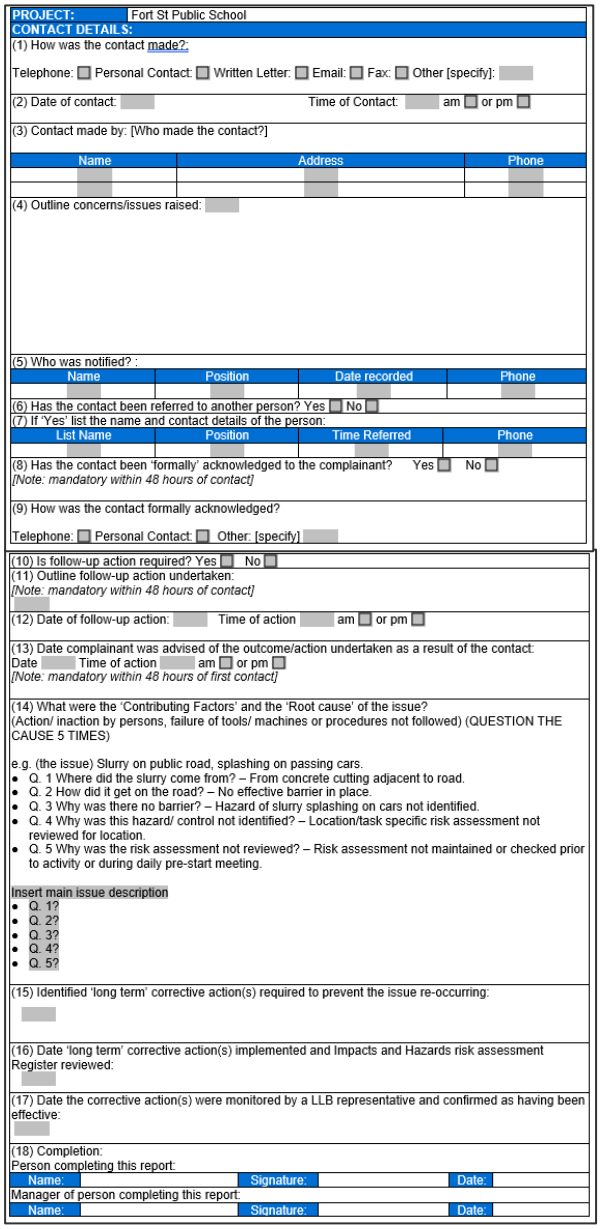
3.2 COMPLAINT MANAGEMENT

Contact with the community is a means by which Lendlease can positively engage stakeholders and potential clients or customers by demonstrating sound management practices in resolving any concerns raised in a timely manner.

Community members that interface with Lendlease Building Business undertakings present the opportunity for feedback and a positive response by Lendlease. Any response shall be commensurate with Lendlease's high regard and sensitivity to social amenity and the lifestyle impacts of its business undertakings.

In addition to the SINSW project hotline and website interface, we will establish a direct complaints management process and formally record any complaints directed through Lendlease channels.

An example of a routine complaint form can be seen below.



PROJECT: Fort St Public School

CONTACT DETAILS:

(1) How was the contact made?:

Telephone: ☐ Personal Contact: ☐ Written Letter: ☐ Email: ☐ Fax: ☐ Other [specify]:

(2) Date of contact: Time of Contact: am ☐ or pm ☐

(3) Contact made by: [Who made the contact?]

Name	Address	Phone

(4) Outline concerns/issues raised:

(5) Who was notified? :

Name	Position	Date recorded	Phone

(6) Has the contact been referred to another person? Yes ☐ No ☐

(7) If 'Yes' list the name and contact details of the person:

List Name	Position	Time Referred	Phone

(8) Has the contact been 'formally' acknowledged to the complainant? Yes ☐ No ☐
[Note: mandatory within 48 hours of contact]

(9) How was the contact formally acknowledged?

Telephone: ☐ Personal Contact: ☐ Other: [specify]

(10) Is follow-up action required? Yes ☐ No ☐

(11) Outline follow-up action undertaken:
[Note: mandatory within 48 hours of contact]

(12) Date of follow-up action: Time of action am ☐ or pm ☐

(13) Date complainant was advised of the outcome/action undertaken as a result of the contact:
Date Time of action am ☐ or pm ☐
[Note: mandatory within 48 hours of first contact]

(14) What were the 'Contributing Factors' and the 'Root cause' of the issue?
(Action/ inaction by persons, failure of tools/ machines or procedures not followed) (QUESTION THE CAUSE 5 TIMES)

e.g. (the issue) Slurry on public road, splashing on passing cars.
- Q. 1 Where did the slurry come from? – From concrete cutting adjacent to road.
- Q. 2 How did it get on the road? – No effective barrier in place.
- Q. 3 Why was there no barrier? – Hazard of slurry splashing on cars not identified.
- Q. 4 Why was this hazard/ control not identified? – Location/task specific risk assessment not reviewed for location.
- Q. 5 Why was the risk assessment not reviewed? – Risk assessment not maintained or checked prior to activity or during daily pre-start meeting.

Insert main issue description
- Q. 1?
- Q. 2?
- Q. 3?
- Q. 4?
- Q. 5?

(15) Identified 'long term' corrective action(s) required to prevent the issue re-occurring:

(16) Date 'long term' corrective action(s) implemented and Impacts and Hazards risk assessment Register reviewed:

(17) Date the corrective action(s) were monitored by a LLB representative and confirmed as having been effective:

(18) Completion:
Person completing this report:

Name:		Signature:		Date:	

Manager of person completing this report:

Name:		Signature:		Date:	

Figure 4 – Complaint Form

3.3 MONITORING AND REPORTING

The project promotes a culture of continuous improvement, constantly striving for better outcomes for the project, our reputation, the community and our stakeholders. The following channels will be used to monitor and review the effectiveness of stakeholder engagement.

CHANNEL	OBJECTIVE	DETAILS
Governance	To provide a summary of the stakeholder engagement and communication performance for inclusion in Governance reports.	Outline key engagement activities for the period Highlight key stakeholder issues and strategies implemented to address them Provide visual updates on status of project (i.e. progress photos) Report on complaints and enquiries response rates
Construction interface meetings with impacted stakeholders	To provide key project stakeholders and Hospital campus representatives with a summary of stakeholder engagement and communications activities underway. This forum acts as a mechanism to ensure key project stakeholders receive timely and relevant communications.	Outline key engagement activities for the period Highlight key stakeholder issues and strategies implemented to address them Provide an opportunity for stakeholders to provide feedback on effectiveness of engagement Provide stakeholders with an opportunity to share their engagement and communication needs
Communications Working Group (CWG)	To provide a summary of stakeholder engagement activities and issues raised and addressed.	Outline key engagement activities for the period Highlight key stakeholder issues and strategies implemented to address them Reporting on key stakeholder issues, complaints and actions taken Seeking advice on the engagement and communication needs of key stakeholder groups

Figure 5 – Stakeholder Engagement Channels

4.0 ENVIRONMENTAL MANAGEMENT FRAMEWORK

4.1 RELATIONSHIP TO EXISTING ENVIRONMENTAL MANAGEMENT SYSTEM

Lendlease has an existing integrated Environmental Health and Safety Management System which is independently certified under ISO 1800118001, ISO 14001 and ISO 9001. This CEMP will form a project specific sub-plan as a part of this sytem. Refer to the below diagramatic overview.

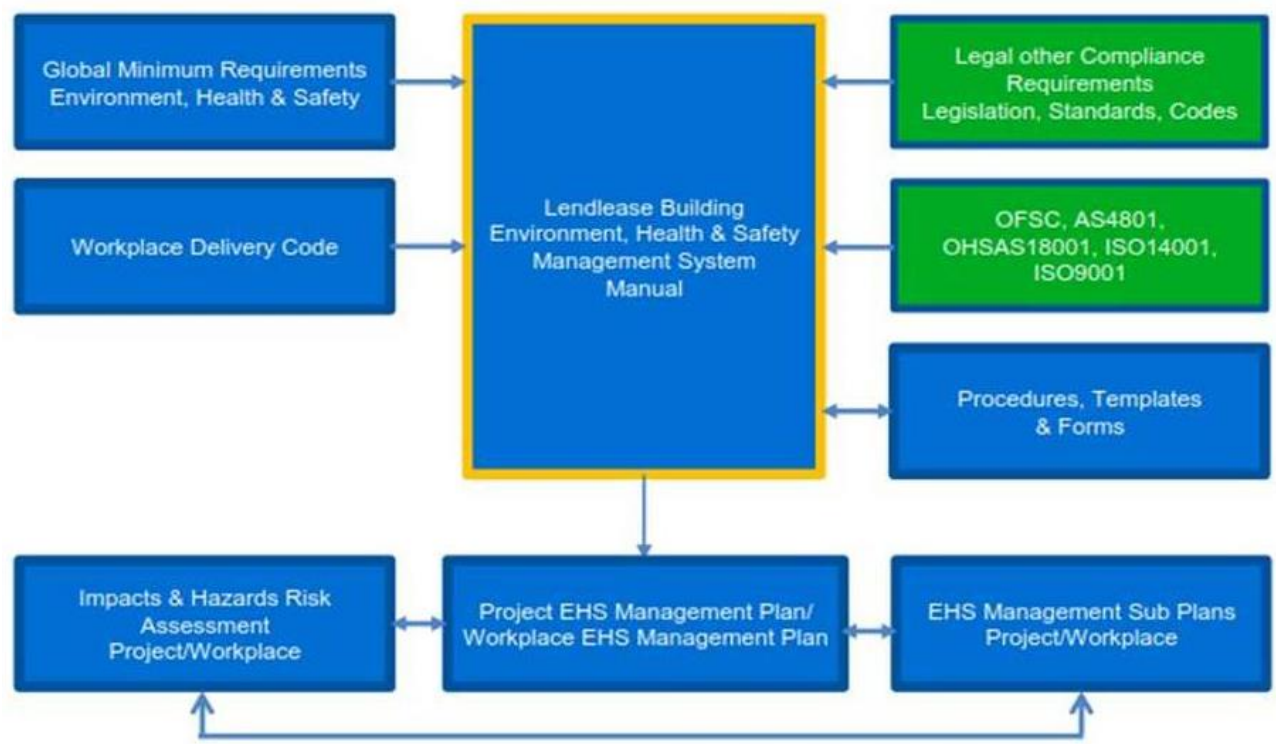


Figure 6 – Lendlease Environmental Health and Safety Management System

4.2 ENVIRONMENTAL MANAGEMENT STRUCTURE AND RESPONSIBILITIES

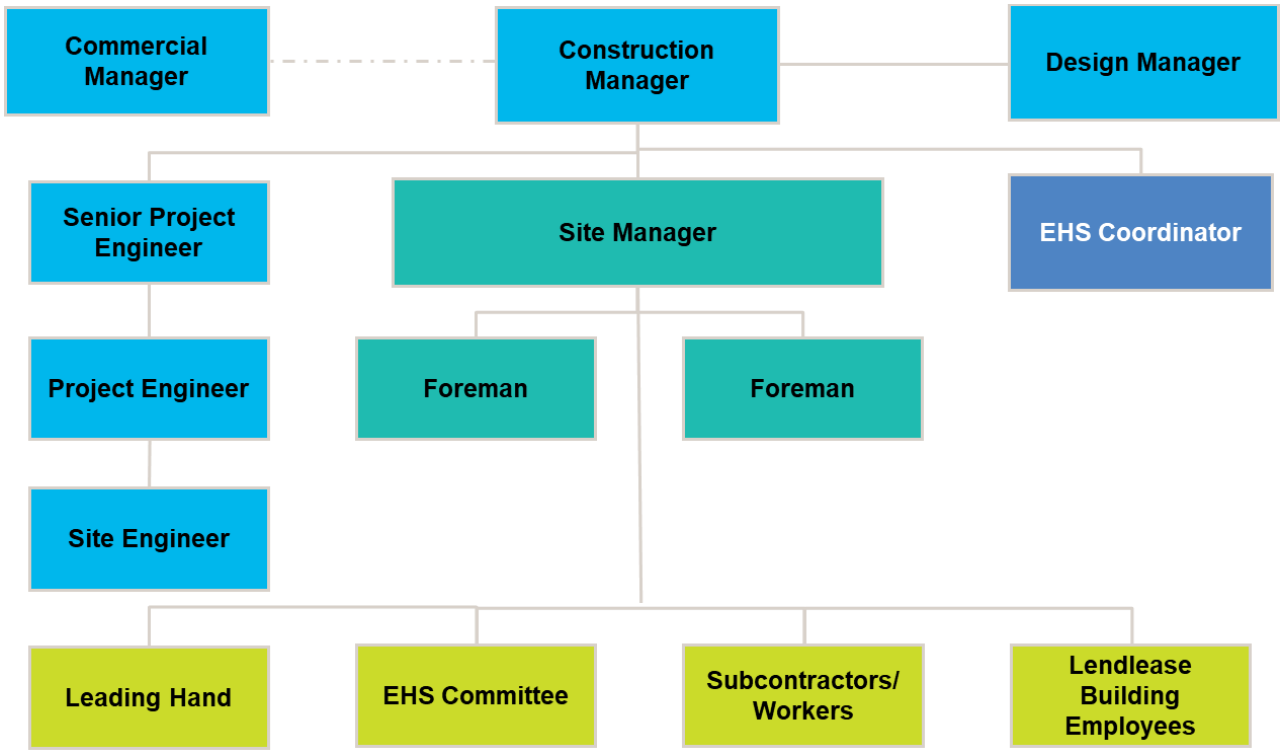


Figure 7 – Team Organisational Structure

For responsibilities matrix across key roles please refer to Appendix B.

4.3 LEGAL, LEGISLATIVE AND COMPLIANCE REQUIREMENTS

A register of Legal, Legislative and Other Requirements has been included in Appendix A.

Lendlease identifies and maintains access to all WHS/OHS/OSH law and environmental law updates and other compliance requirements (e.g. standards, codes, conditions, approvals and others), which are available at LLB workplaces and on the intranet (see Appendix 2 for further information). WHS/OHS/OSH law, environment protection legislation and other compliance requirements; e.g. codes of practice, Client conditions, development approval and standards that apply to this workplace, are listed in the project Impacts & Hazards Risk Assessment.

LendleaseLendlease operations are required to collect concise data on energy use, carbon emissions, water consumption, waste disposal and waste recovery at a project level. The data is used to monitor a project's environmental performance and to meet Lendlease Corporation obligations under the National Greenhouse and Energy Reporting Act 2007.

Data is recorded in Footprint and verified by each Regional Business Unit, Strategic Business Unit, nominated employee, with oversight by the Lendlease Building National Sustainability Function and external assurance auditors.

4.4 Approvals Permits and LicensingLicensing

A number of approvals, permits and licenses have, and/or will be obtained for the Project. Appendix A contains a register of all relevant environmental approvals, permits and licenses.

The register will be maintained by the Design Manager and will be reviewed prior to the commencement of construction and/or stages of construction, and at regular intervals during construction and at least annually as part of the management review.

The SSDA Development Conditions recognised that the following approvals and licences identified in the planning approval process would/have be obtained, or are required for the Project:

- Project Approval under the EP&A Act.
- Approval from associated asset owners (TfNSW and CoS) for works to the Upper Fort Street widening and Bradfield vent shaft
- Approval for works to Bradfield Vent Shaft under section 138 of the Roads Act 1993.
- Heritage NSW approval of the Archaeological Research Design

In accordance with the SSDA Planning Conditions, all necessary licences, permits and approvals required for the development of the Project will be obtained and maintained as required throughout the life of the Project. No condition of the Project Approval removes the obligation for SINSW or Lendlease to obtain, renew or comply with such necessary licences, permits or approvals except as provided under Section 75U of the EP&A Act.

The SSDA requirements, SINSW specification requirements and other applicable legislative controls are detailed within the Legal and other requirements register (Appendix A).

4.5 TRAINING AND AWARENESS

To ensure that this CEMP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this CEMP. The Construction Manager will coordinate the environmental training.

All personnel (including sub-contractors) are required to attend a compulsory site induction that includes an environmental component prior to commencement on-site. This is done to ensure all personnel involved in the Project are aware of the requirements of the CEMP and to ensure the implementation of environmental management measures. All visitors are required to sign into the site via the QR Code system located on the site opening wall and be accompanied at all times by an inducted person(s). All delivery drivers must obey all traffic controller instructions and are given on arrival the FSPS Truck Delivery Route sheet to follow.

The EHS Coordinator (or delegate) will conduct the environmental component of the site inductions.

The environmental component will include, but not be limited to, an overview of:

- Relevant details of the CEMP including purpose and objectives.
- Key environmental issues.
- Deliveries entering and exiting site
- Conditions of environmental licences, permits, approvals and other applicable legal requirements (including changes where applicable).
- Specific environmental management requirements and responsibilities.
- Mitigation measures for the control of environmental issues.
- Incident response and reporting requirements; and
- Information relating to the location of environmental constraints.

A record of all inductions will be maintained and kept on-site. The Construction Manager may authorise amendments to the induction at any time. Possible reasons for changes to the induction may be Project modifications, legislative changes or amendments to this CEMP or related documentation.

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction.

Toolbox talks will be tailored to specific environmental issues relevant to upcoming works.

Relevant environmental issues may include (but are not limited to):

- Changes to Project legal requirements, where applicable.
- Erosion and sedimentation control.
- Hours of work.
- Emergency and spill response.
- Aboriginal and non-Aboriginal heritage.
- Threatened species, endangered ecological communities, clearing controls and vegetation protection.
- Noise and mitigation measures.
- Traffic management measures.
- Impacts of external lighting and compliance requirements.

4.6 ENVIRONMENTAL RISK ASSESSMENT

Impacts and hazards related to the workplace are recorded in the Project Impacts & Hazards Risk Assessment. To ensure the IHRA remains current it must be reviewed:

- during project coordination meetings when reviewing the next 6 weeks of activities and related GMR independent engineer reviews for acute risks; and
- at maximum six (6) week intervals during Project Review Meetings by the Construction Manager, or a nominated representative, to ensure currency and accuracy.

Workers are encouraged through the workplace specific induction, tool box/pre-start talks and other consultative forums to identify and control health and safety hazards and risks and environment aspects and impacts on a ‘see and fix’ basis where reasonably practicable to do so and to immediately report these impacts and hazards to their supervisor or Lendlease personnel.

Where high risk impacts or hazards present an imminent or immediate risk of serious harm to a worker are identified that specifically relate to a work area or work task under the control of Lendlease, a subcontractor or other worker due to ineffective or inadequate control measures, the work task shall be stopped. Consultation must then be undertaken with key stakeholders including relevant workers involved in the task to achieve the required control measures.

All incident events and observations must be entered in Enablon and related non-conformities must be issued by the Foreman/Area Supervisor with corrective action instigated and agreed by the relevant subcontractor supervisor, which is then tracked to completion in Enablon.

4.7 HOLD POINTS

At the completion of site remediation works, a validation report will be prepared in general accordance with EPA (2017) and OEH (2011) Guidelines for Consultants Reporting on Contaminated Site (or as updated), documenting the works as completed as per JBS&G Remedial Action Plan 19 June 2020.

- Details of the remediation works conducted;
- Present all sampling field notes and laboratory data including calibration certificates for field monitoring equipment, environmental monitoring etc.;
- Undertake an assessment of QA/QC of analytical data generated by the works and identify data that is reliable for use in characterising the site;
- Sort data into data sets as required by the decision rules;
- Assess whether sufficient data has been obtained to meet required limits on decision error;
- Undertake assessment to the decision rules and identify any environmental data which causes decision rules to be failed;
- Information demonstrating compliance with appropriate regulations and guidelines;
- Any variations to the strategy undertaken during the implementation of the remedial works;
- Results of all environmental monitoring undertaken during the course of the remedial works;
- Details of any environmental incidents occurring during the course of the remedial works and the actions undertaken in response to these incidents;
- Verification of regulatory compliance;
- Provide a summary of waste disposal activities and volumes of waste removed from the Site including supply of all waste disposal dockets confirming final waste disposal/landfill destination;
- Provide a summary of material importation activities (general fill soil/crushed rock, growing media, earthworks aggregates, drainage backfill etc), including material source, type, assessment of suitability, approximate quantities, date of importation and final placement location;
- Identify the requirements for the EMP (where appropriate) including inclusion of a survey clearly identifying the extent of the retained impacted material and associated capping; and
- Provide a comment on the suitability of the Site (or portions thereof) for the proposed use and requirements for any ongoing monitoring/management (where applicable).

4.8 INSPECTIONS, MONITORING & REPORTING

4.8.1 Environmental inspections

A compliance monitoring inspectioninspection program must implemented during construction works in order to monitor compliance with the terms of the project approval. Compliance tracking will be undertaken in accordance with the project EH&S management plan.

The effectiveness of environmental protection measures described in this CEMP and sub plans will be assessed on a 3 monthly basis by the relevant team members. TheThe following activities will be undertaken:

- Provide a surveillance tool to ensure that safeguards are being implemented;
- Identify where problems might be occurring;
- Identify where sound environmental practices are not being implemented; and
- Facilitate the identification and early resolution of problems.

Weekly environmental inspections will monitor aspects including;

- Review of relevant works approvals and permits
- Erosion and sediment controls and review of associated plans
- Drainage/groundwater protection
- Air quality, odours, dust emissions and mitigating controls
- Heritage impacts
- Noise and vibration management including approved working hours, required respites and safe working distances
- External lighting installation (temporary and permanent) and compliance to AS 4282-2019 Control of the obtrusive effects of outdoor lighting
- Hazardous substances and dangerous goods
- Waste management, recycling and recovery

Any non-conformances identified through the checklist process will be highlighted and an inspection report (minor issues) undertaken as a section of our weekly EHS Inspection Form will be completed by the SiteSite Manager.

The checklist will remain 'open' until:

- The issue has been resolved;
- A new or revised procedure has been established and implemented; or
- Training has been provided to relevant personnel/ sub-contractors.

Site Activity/Description	Frequency	By Whom	Form
FencingFencing and Hoarding Checklist	Daily	Site Supervisor/Foreman	EnablonEnablon Inspection App
Lendlease environmental site inspection of activities	Weekly/Monthly	Site Supervisor, Site Foreman, Site Manager, EH&S Coordinator, Construction Manager, Client Authorised personnel	EHS Inspection Form

4.8.2 Environmental monitoring program

Environmental monitoring will involve collecting and interpreting data to provide quantification of the effectiveness of the CEMP and sub plans. As required under approved conditions, Construction Monitoring Programs are required to be prepared in consultation with the relevant government agencies. The following monitoring programmes will be implemented;

- A Construction Noise and Vibration Monitoring Program is incorporated within the Construction Noise and Vibration Management Sub Plan (CNVMSP) and includes provision of 'realtime' noise and vibration monitoring. This program has been developed in compliance with MCoA B37 and associated conditions during construction with all 'realtime' noise and vibration monitoring data being made available to DPE, EPA, the construction team, and other parties.
- Waste monitoring reporting is incorporated within the Construction Waste Management sub plan

(CWMSP). in accordance with the

These aspects will be managed by the site environmental management, inspection and auditing procedures.

The timing, frequency, methodology, locations and responsibilities for the proposed environmental monitoring programs are specified in the respective Sub plans. The monitoring programs range from those involving formal sample collection, analysis and measurement, to those involving a more qualitative assessment.

Irrespective of the type of monitoring conducted, the results will be used to identify potential or actual problems arising from construction processes. Where monitoring methods permit, results will be obtained at the time of the assessment and analysed immediately by the EH&S Coordinator. This will allow a prompt response to be initiated should an exceedance of accepted levels/criteria be identified.

Where this cannot be achieved, preliminary results will be requested as soon as possible following the monitoring episode with a full report to follow.

Where a non-conformance is detected or monitoring results are outside of the expected range, the process outlinedoutlined below will be implemented:

- The results will be analysed by the EH&S Coordinator in more detail with the view of determining possible causes for the non-conformance;
- A site inspection will be undertaken by the relevant personnel;
- Relevant stakeholders will be contacted and advised of the problem.
- An agreed action will be identified; or
- Action will be implemented to rectify the problem.

A non-conformancemay be issued by the EH&S Coordinator in response to the problem if it is found to be construction related. The timing for any improvement will be agreed between the Construction Manager and EH&S Coordinator based on the level of risk e.g. a significant risk will require immediate action.

Monitoring Requirement	Frequency
Noise monitoring	Continuous ‘realtime’ monitoring and attended monitoring at the commencement of each work activity to confirm forecasts in the CNVIS
Vibration monitoring	Continuous ‘realtime’ monitoring and attended monitoring at the commencement of each work activity to confirm forecasts in the CNVIS
Dust monitoring	Visual monitoring completed throughout duration of works and during weekly inspections
Erosion and Sediment Control Monitoring	Weekly by Construction Manager and Senior Project Engineer andas soon as practicable after any major rainfall event; i.e. 10mm in 24 hours
External Lighting to AS 4282-2019 Control of the obtrusive effects of outdoor lighting	At the initial stages of the installation of any temporary or permanent lighting and ongoing on a weekly basis

The

4.8.3 Lendlease Environmental Auditing

Internal environmental compliance audits will be conducted by the EH&S Manager. Elements to be audited include:

- Compliance with the conditions of approval;
- Compliance with the CEMP & associated sub plans;
- Compliance with approval, permit and licence obligations;
- Compliance with method statements;
- Complaint response;
- Sub-contractor activities;
- Training records;
- Non-conformances;
- Monitoring results; and
- System documentation such as checklist completion.

Regional environmental system compliance audits will be completed by the EH&S Manager to monitor compliance with the Lendlease EHS Management System.

4.8.4 External Environmental Auditing

External audits may be conducted by Schools Infrastructure New South Wales and the Independent Environmental Auditor.

As required by the Development Consent conditions, Independent Environmental Audits will be undertaken in line with the Compliance Reporting Post Approval Requirements. A schedule for these audits is to be prepared in conjunction with the Independent Environmental Auditor and issued to the Planning Secretary and Certifier.

Audit Type	Auditor	Timing
Lendlease Workplace EH&S Audit	Lendlease EH&S Manager	Initial audit within 3 months of construction commencement, then 6 monthly during construction
External Audits	Independent Environmental Auditor	Initial within 12 weeks of commencement, and subsequently 26 weeks.

4.8.5 Corrective and preventative actions

The outcomes of any audit, if reported to Lendlease, will be documented. Corrective Action Requests (CAR) and Observations of Concern (OOC) will be addressed through the same mechanisms as non-conformances. Resolution of CARs and OOCs will be documented and filed with the Audit Report.

4.9 ENVIRONMENTAL INCIDENT AND EMERGENCY PLANNING, PREPAREDNESS AND RESPONSE

Incident reporting and related management of events and corrective and preventative actions are carried out in accordance with the Lendlease Incident Reporting Management Procedure, please see below incident reporting and management guide in line with the conditions listed below:

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.

Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix A

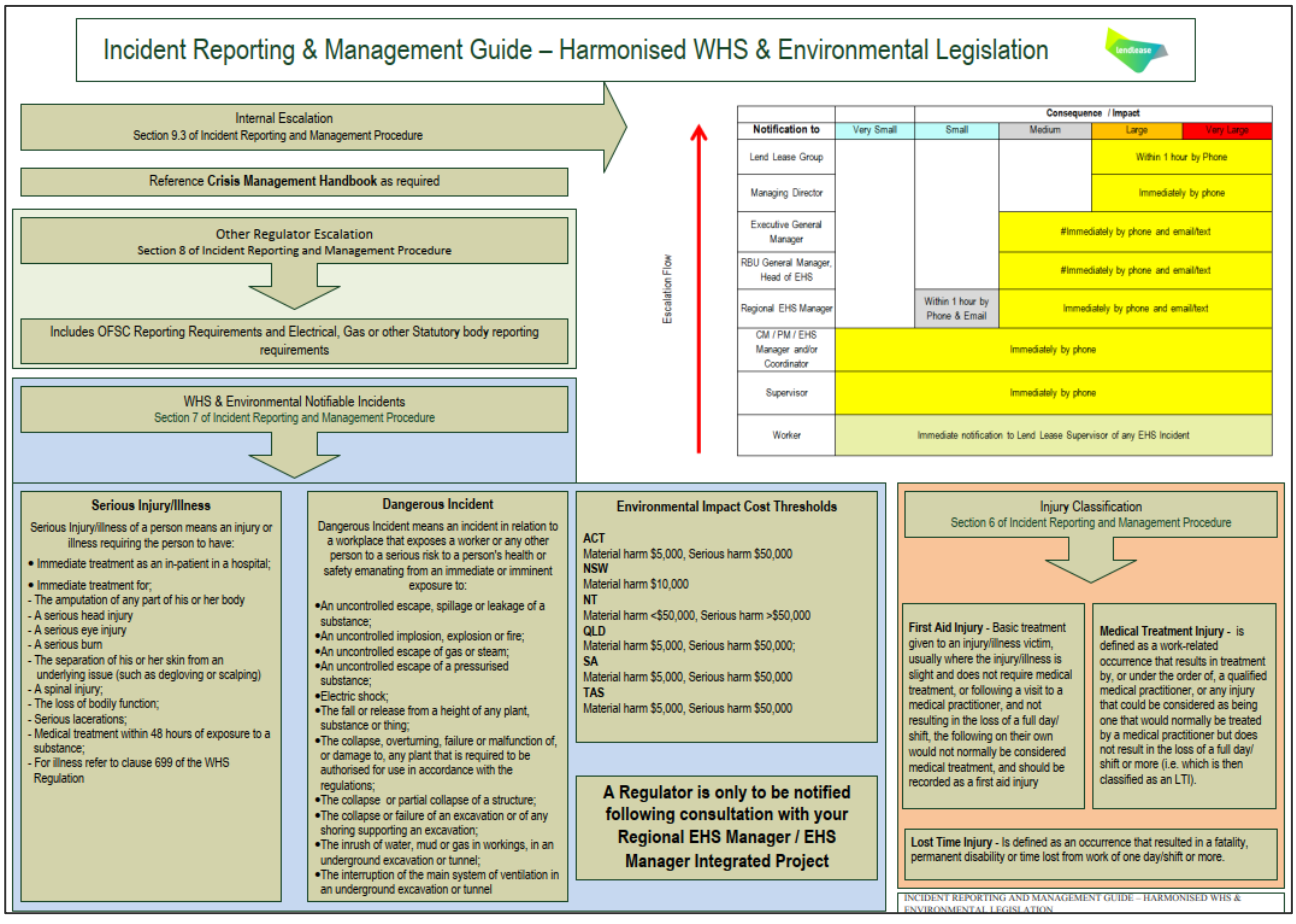


Figure 8 – Incident Reporting and Management Guide

5.0 UNEXPECTED FINDS PROTOCOL

5.1 OVERVIEW

The objectives for the project include to provide control measures for the protection and management of known and unknown/unexpected contamination, heritage, archaeological items and features including but not limited to; soil profiles, trees, buildings, structures, artefacts, relics, human remains and places.

Lendlease are to:

- Ensure all risks associated with excavation and exposure of workers or the public to contamination are eliminated where possible.
- Follow the protocols and communication procedures outlined below for unexpected finds related to contamination, archaeological heritage and aboriginal heritage.
- To protect or conserve (where possible) known Indigenous and Non-indigenous heritage and archaeological items and features on and adjacent to the site.
- To protect and conserve (where possible) previously undiscovered heritage and archaeological items and features on or adjacent to the site.
- To manage heritage and archaeological items and features impacted by construction in accordance with regulatory requirements.

5.2 CONTAMINATION

5.2.1 Protocol and Communication Procedure

The contamination consultant for the project is included in the table below;

Name	Role	Contact Details
Daniel Denaro Senior Project Manager JBS&G	Contamination Consultant	0468 425 321 DDenaro@jbsg.com.au

The possibility exists for hazards that have not been identified to date to be present within fill materials or un derlying existing pavements/building on the site. These hazards may present novel conditions which require to be addressed to ensure that the continuation of site works is completed in a manner which achieves the project objectives.

An example of such a condition would be the identification of previously unknown contaminants within site so ilso and/or excavation dewater.

The procedure has been abstracted for the RAP, as relevant to potential soil and water management at the s ite. The nature of hazards which may be present and which may be discovered at the site are generally dete ctable through visual or olfactory means, for example:

- Hydrocarbon impacted materials (visible/odorous); and/or
- Drums, waste pits, former pipework or USTs (visible); and/or
- Oily Ash and/or oily slag contaminated soils/fill materials (visible/odorous); and/or
- Tarry like impacted soil/fill material (visible/odorous); and/or
- Potential chlorinated hydrocarbon impact (sweet odour soils).

As a precautionary measure to ensure the protection of the workforce and surrounding community, should a any of the abovementioned substances (or any other unexpected potentially hazardous substance) be identif ied, the procedure summarised in the below figure is to be followed.

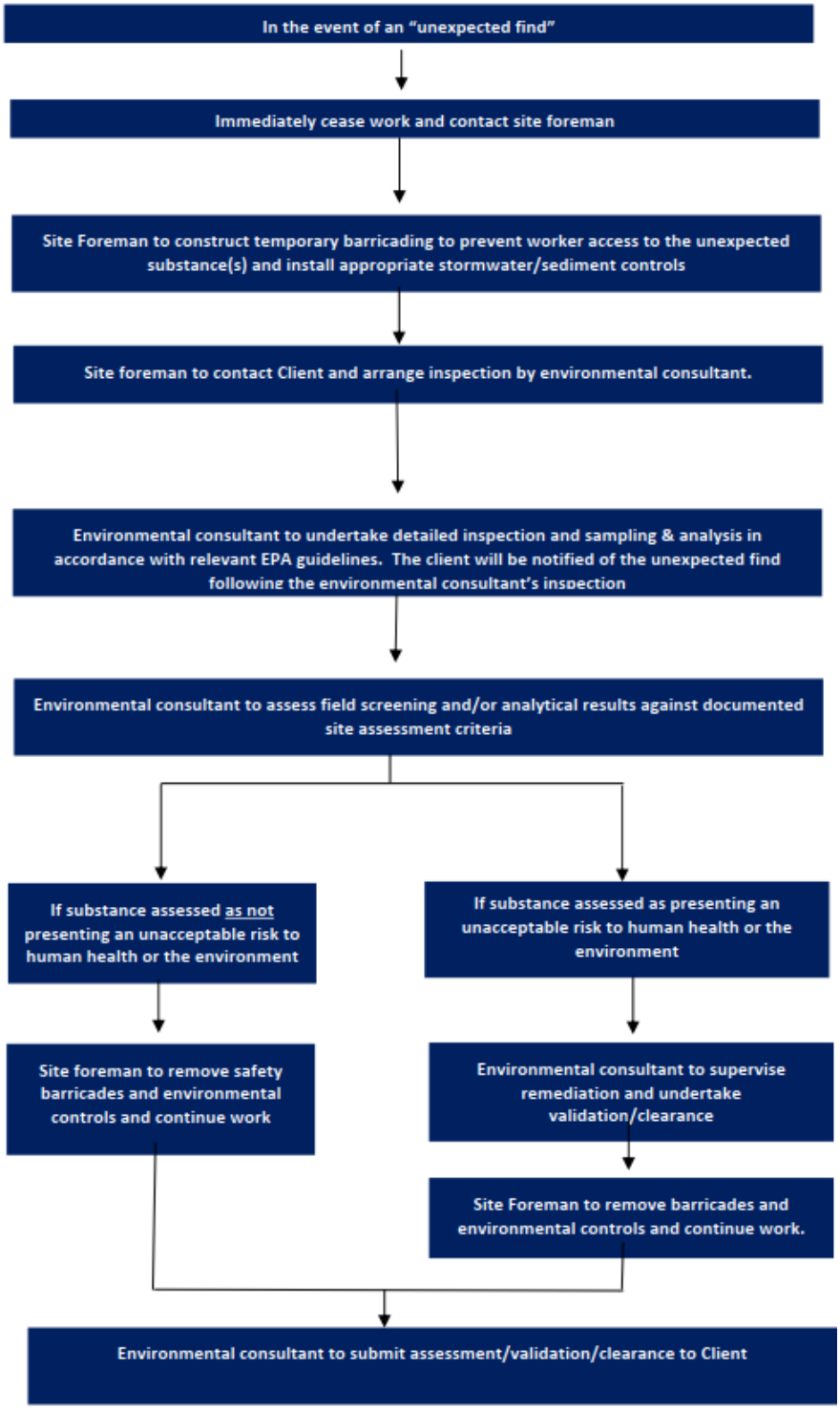


Figure 9 – Unexpected Finds Protocol Contamination

5.3 ARCHEALOGICAL HERITAGE

5.3.1 Protocol and Communication Procedure

The nominated heritage consultant and archaeologist (Excavation Director) for the project is included in the table below;

Name	Role	Contact Details
Matthew Kelly Senior Archaeologist Curio Projects	Excavation Director (Archaeology)	0412 035 440 matthew.kelly@curioprojects.com.au

There is potential that unexpected physical evidence associated with the phases of occupation at the site may be present in all areas of the site. Such unexpected remains may include, but not be limited to:

- Deep cut wells, reservoirs and pits associated with occupation at the site;
- Structural remains and artefacts;
- Rubbish pits containing waste and discarded artefacts disposed of away from housing
- Other unexpected, buried remains.

Unexpected finds do not include isolated artefacts and building remains that may form part of fill deposits. If unexpected finds are exposed or disturbed work should cease in that area and a Curio archaeologist notified of the find as soon as practicable. Do not move the item or attempt to further disturb it. Take a photo and forward to the archaeologist and they will discuss and advise the next step which may include, but not be limited to (The client to be informed prior to any external agency/authority notifications) :

- A site visit by the archaeologist;
- An instruction to move the item;
- No further action required. The Excavation Director will assess the archaeological research significance of all Unexpected Finds and this assessment will determine the action to be followed. These may include:
- No further action (i.e. the find is not significant);
- Retention of isolated artefacts, that otherwise are assessed as of low archaeological research potential, as items for possible use in interpreting the site, display, etc;
- Recording of the location of the find and
- Retaining artefact(s) of research potential for the archaeological collection and further analysis;
- further recording and excavation to expose a larger feature or structural remains;
- Notification of the find(s) to Heritage NSW and further liaison with them;
- Additional research to identify larger features if not previously identified in the historical record;
- Reassessment of the significance of the unexpected find in light of this research.

Some of the attributes of any unexpected finds that may determine if further advice is sought from Heritage NSW regarding the find are:

- Larger previously unrecorded features especially structural remains;
- Suspected human remains;
- Evidence for earlier occupation of the site (i.e. pre 1815);
- Rare or unusual find.

If State or locally significant relics are found during works, the Heritage Council of NSW is to be notified in accordance with s.146 of the Heritage Act 1977. This notification takes place in the form of an email to the relevant archaeologist at Heritage NSW. It is noted that Section 4.41 of the Environmental Planning and Assessment Act 1979 does not exempt notification of the discovery of relics under s146, of the Heritage Act 1977, nor the notification of the discovery of Aboriginal objects under s89 of the NPW Act for State Significant Development or State Significant Infrastructure.

The client to be informed prior to any external agency/authority notifications:

Depending on the assessed significance of the find it may be necessary to undertaken additional assessment and management recommendations related to the new information. Work may only recommence with the written approval of Heritage NSW.

5.4 ABORIGINAL HERITAGE

5.4.1 Protocol and Communication Procedure

The nominated Archaeologist (Aboriginal Heritage) for the project is included in the table below;

Name	Role	Contact Details
Sam Cooling Cultural Heritage Manager Curio Projects	Archaeologist (Aboriginal Heritage)	0402 522 789 sam.cooling@curioprojects.com.au

Upon discovery of an archaeological feature that is suspected to be an Aboriginal Unexpected Find (excluding human remains- see Section 6.4.2 below), the following procedure should be followed (The client to be informed prior to any external agency/authority notifications) :

1. Cease works in the immediate vicinity of the find.
2. Contact the project archaeologist to verify the nature of the find.
3. If Unexpected Find is confirmed as Aboriginal archaeology, project archaeologist will notify project Register Aboriginal Parties (RAPs) and Biodiversity & Conservation Division (BCD) of the find. (If Unexpected Find is confirmed as not Aboriginal in origin, project archaeologist will provide advice for works to recommence).
4. Project Archaeologist/Project RAPs will undertake a preliminary assessment and recording of the find.
5. Formulate archaeological or heritage management plan- specific to nature of the find.
6. Implement archaeological/heritage management plan.
7. Works may commence once archaeological/heritage management plan has been successfully implemented and project archaeologist provides sign off to contractor for works to resume in vicinity of find.

5.4.2 Unexpected Skeletal Remains

While not anticipated to be encountered within the FSPS study area, the unexpected discovery of any potential skeletal remains during development works would be managed in accordance with the approved Office of Environment and Heritage (OEH) protocol for the discovery of human remains which is stated as:

If any suspected human remains are discovered and/or harmed the proponent must (The client to be informed prior to any external agency/authority notifications) :

a) Not further harm these remains;
b) Immediately cease all work at the location;
c) Secure the area to avoid further harm to the remains;
d) Notify the local police and OEH's (now BCD of DPIE) Environment Line on 131 555 as soon as practicable and provide any available details of the remains and their location; and
e) Not recommence any work at the location unless authorised in writing by OEH (now BCD of DPIE).

6.0 CONSTRUCTION TRAFFIC AND PEDESTRIAN MANAGEMENT

6.1 OVERVIEW

Lendlease has developed the Construction Traffic and Pedestrian Management Subplan (CTPMSP) in conjunction with a qualified expert company, Arup Pty Ltd.

The CTPMSP has been prepared in consultation with TfNSW and the City of Sydney. The CTPMSP is in accordance with the approved SSD Conditions and has been endorsed by the applicable Authorities. The plan addresses all traffic and pedestrian details in accordance with the staging and construction of the Fort Street Public School.

The Construction Worker Transportation Strategy has been prepared in accordance with conditions outlined in the planning conditions. This is a combined document which identifies the measures in place to safely and effectively manage workers transportation.

This assessment has been conducted in accordance with the requirements below:
- Conditions B18, B22 and B27 of the Development Consent (SSD 10340).

The CTPMSP is provided in Appendix CppendixC.

6.2 MONITORING & CONSULTATION

During the construction works, Lendlease will continue to monitor the effectiveness of the CTPMSP and the controls in place and update the plan as required.

7.0 CONSTRUCTION NOISE AND VIBRATION MANAGEMENT

7.1 OVERVIEW

Lendlease has developed the Construction Noise and Vibration Management Subplan (CNVMSP) in conjunction with a qualified expert company, Stantec Pty Ltd.

The CNVMSP has been prepared in consultation with the local community for the management of high noise generating works. The CNVMSP is in accordance with the approved SSD Conditions. The plan addresses all noise and vibration considerations including measures to mitigate impacts to sensitive receivers in accordance with the staging and construction of the Fort Street Public School.

This assessment has been conducted in accordance with the requirements below:

- Conditions B19 of the Development Consent (SSD 10340).

The CNVMSP is provided in Appendix E

7.2 MONITORING & CONSULTATION

During the construction works, Lendlease will continue to monitor the effectiveness of the CNVMSP and the controls in place and update the plan as required.

8.0 CONSTRUCTION WASTE MANAGEMENT

8.1 OVERVIEW

Lendlease has developed the Construction Waste Management Subplan (CWMSP).

The CWMSP is in accordance with the approved SSD Conditions. The plan addresses all waste management in accordance with the staging and construction of the Fort Street Public School.

This assessment has been conducted in accordance with the requirements below:

- Conditions B20 of the Development Consent (SSD 10340).

The CWMSP is provided in Appendix F

8.2 MONITORING & CONSULTATION

During the construction works, Lendlease will continue to monitor the effectiveness of the CWMSP and the controls in place and update the plan as required.

9.0 CONSTRUCTION SOIL AND WATER MANAGEMENT

9.1 OVERVIEW

Lendlease has developed the Construction Soil and Water Management Subplan (CSWMSP) in conjunction with a qualified expert company, JBS&G Pty Ltd.

The CSWMSP has been prepared in consultation with the City of Sydney. The CSWMSP is in accordance with the approved SSD Conditions and has been endorsed by the applicable Authorities. The plan addresses all soil and water management issues in accordance with the staging and construction of the Fort Street Public School.

This assessment has been conducted in accordance with the requirements below:

- Conditions B21 of the Development Consent (SSD 10340).

The CSWMSP is provided in Appendix D.

9.2 MONITORING & CONSULTATION

During the construction works, Lendlease will continue to monitor the effectiveness of the CSWMSP and the controls in place and update the plan as required.

10.0 CEMP REVIEW AND REVISION PROCESS

10.1 REVIEW PROCESS

This Construction Environmental Management Plan and its associated sub-plans will be reviewed as a minimum on a 3 monthly basis as a part of the regular contractual monthly reporting process and Lendlease's ongoing EH&S management plan internal reviews.

10.2 REVISIONS

The frequency of revision to this Construction Environmental Management Plan will be as required and no less that every three months. Should any amendments or corrective actions be required following external audits a revision will be provided within 5 business days following the notification. All revision will be tracked using the revision status table on page 2 of the CEMP.

Appendix A – Legal, Legislative and Other Requirements

Act	Activity/Aspect	Requirement	Reference
Environmental Planning and Assessment Act 1979	All	Comply with the Development Consent for the project as modified through the planning approval process	Consent Conditions
National Parks and Wildlife Act 1974	Aboriginal Heritage	An Aboriginal Place or Object has the definition under the act to be considered throughout the development of the site and in particular during the excavation and archaeological research works.	Consent Conditions
Biodiversity Conservation Act 2016	Threatened species and ecological environments	Comply with conservation requirements for any identified threatened species on the site and as outlined in the planning conditions.	Consent Conditions
Biodiversity Conservation Act 2016	Heritage item	Any heritage item as identified under the Biodiversity Conservation Act 2016	Consent Conditions
Building Code of Australia	All	Comply with the BCA across all aspects of design and construction of the development.	Consent Conditions
Environment Protection and Biodiversity Conservation Act 1999	Threatened species and ecological environments	Comply with protection requirements for any identified threatened species on the site and as outlined in the planning conditions.	Consent Conditions
Environment Protection and Biodiversity Conservation Act 1999	Heritage item	Any heritage item as identified under the Environment Protection and Biodiversity Conservation Act 1999	Consent Conditions
Heritage Act 1977	Heritage item	Any heritage item as identified under the Heritage Act 1977	Consent Conditions
Protection of the Environment Operations Act 1997	Operational Waste Management	The handling, storage and disposal of all waste streams on site is to be implemented in accordance with the POEO Act.	Consent Conditions
Contaminated Land Management Act 1997	Site remediation and ongoing management	Compliance for all site remediation works including the designation of a site auditor and ongoing management requirements for contaminated land	Consent Conditions

Act	Activity/Aspect	Requirement	Reference
Surveying and Spatial Information Act 2002	Protection of Survey Infrastructure	Identification and protection of any permanent survey marks in the public domain on the project.	Consent Conditions
Roads Act 1993	Works to TfNSW assets	Approval to be provided under the under section 138 of the Roads Act 1993 for any works to the Bradfield vent shaft	Consent Conditions
Public Health Act 2010	Air conditioning installation	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	Consent Conditions
Sydney Water Act 1994	Water and Sewage Infrastructure	Compliance certificate to be issued in accordance with Sydney Water Act 1994 for all water and sewage infrastructure prior to occupation	Consent Conditions
Protection of the Environment Operations (Waste) Regulation 2014	Operational Waste Management	The handling, storage and disposal of all waste streams on site is to be implemented in accordance with the regulation.	Consent Conditions
National Greenhouse and Energy Reporting Act 2007	Energy reporting	Commitment to report on energy consumption under the NGERS Act for all site operations.	Lendlease requirement

Consent Condition	Requirement	Reference
B17	(i) hours of work;	Section 2.5.1
	(ii) 24-hour contact details of site manager;	Section 2.2
	(iii) management of dust and odour to protect the amenity of the neighbourhood;	Section 4.8, CWMSP, CNVMSP
	(iv) stormwater control and discharge;	CSWMSP
	(v) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;	Section 2.3, CSWMSP
	(vi) groundwater management plan including measures to prevent groundwater contamination;	CSWMSP
	(vii) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	Section 4.8

Consent Condition	Requirement	Reference
	(viii) community consultation and complaints handling;	Section 3.0
	(b) an unexpected finds protocol for contamination and associated communications procedure to ensure that potentially contaminated material is appropriately managed;	Section 5.2, CSWMSP
	(c) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications procedure;	Section 5.3, Section 5.4
	(d) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site;	CSWMSP
	(e) Construction Traffic and Pedestrian Management Sub-Plan (see condition B18);	Appendix C
	(f) Construction Noise and Vibration Management Sub-Plan (see condition B19);	Appendix E
	(g) Construction Waste Management Sub-Plan (see condition B20); and	Appendix F
	(h) Construction Soil and Water Management Sub-Plan (see condition B21).	Appendix D
B18	Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP)	Appendix C
B19	Construction Noise and Vibration Management Sub-Plan	Appendix E
B20	Construction Waste Management Sub-Plan (CWMSP)	Appendix F
B21	Construction Soil and Water Management Sub-Plan (CSWMSP)	Appendix D
B22	Driver Code of Conduct	Refer to CTPMSP Appendix C

Appendix B – Roles and Responsibilities

Roles and Responsibilities	
Construction Manager	The environmental responsibilities of the Construction Manager include (but are not limited to) the following: Plan construction works in a manner that avoids or minimises impact to environment; Ensure the requirements of this CEMP are fully implemented; Ensure construction personnel manage construction works in accordance with statutory and approval requirements; Ensure environmental management procedures and protection measures are implemented; Ensure all Project personnel attend an induction prior to commencing works; Liaise with SINSW and other government authorities as required; and Stop work immediately if an unacceptable impact on the environment is likely to occur.
Site Manager	The environmental responsibilities of the Site Manager include (but are not limited to) the following: Communicate with all personnel and sub-contractors regarding compliance with the CEMP and site-specific environmental issues; Ensure all site workers attend an environmental induction prior to the commencement of works; Participate in the preparation and implementation of Environmental Planning and Control measures; Co-ordinate the implementation of the CEMP; Co-ordinate the implementation and maintenance of pollution control measures; Identify resources required for implementation of the CEMP; Attend environmental inspections as required; Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the appropriate escalation points; Co-ordinate action in emergency situations and allocate required resources; and Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and EHS Coordinator. Manage the day-to-day environmental elements of construction;

Roles and Responsibilities	
EHS Coordinator	The environmental responsibilities of the Environmental Officer include, but are not limited to, the following: Assist in preparing the CEMP (including any future revisions) in accordance with all relevant requirements; Undertake site inspections, carry out monitoring activities and complete site checklists with the approval of the Site Manager; Ensure monitoring records are appropriately maintained, reviewed and any non-compliance issues addressed with the approval of the Environmental Site Representative; Record and provide written reports to the Site Manager of non-conformances or corrective actions with the CEMP. This may include the need to implement additional, or revise existing, mitigation measures; Assist in identifying environmental risks; Advise the Site Manager and Construction Manager of the need to stop work immediately if an unacceptable impact on the environment is likely to occur or to require other reasonable steps to be taken by the Construction Manager or site construction staff to avoid or minimise impacts; Provide reports to the Site Manager on any major issues resulting from the Project; Assist all site staff with issues concerning Project environmental matters; Assist in developing training programs regarding environmental requirements and deliver where required, including delivery of the environmental component of toolbox talks; and Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager, Site Manager and project team.
Design Manager	The environmental responsibilities of the Design Manager include (but are not limited to) the following: Provide input into the preparation of environmental planning documents as required; Ensure that the design is completed in compliance with all legal, legislative and environmental requirements on the project; Identify any environmental risks in the design; Identify resource needs for implementation of CEMP requirements and related documents; Ensure that consultant teams are aware of the environmental obligations on the project; Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Construction Manager and Site Manager.

Roles and Responsibilities	
Project Engineers	The environmental responsibilities of the Project engineers include (but are not limited to) the following: Provide input into the preparation of environmental planning documents as required; Ensure that instructions are issued and adequate information provided to employees that relate to environmental risks on-site; Ensure that the works are carried out in accordance with the requirements of the CEMP and supporting documentation, including the implementation of all environmental controls; Identify any environmental risks; Identify resource needs for implementation of CEMP requirements and related documents; Ensure that complaints are investigated to ensure effective resolution; Take action in the event of an emergency and allocate the required resources to minimise the environmental impact; and Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Construction Manager and Site Manager. Track environmental observations weekly.
Foreman	The environmental responsibilities of the foreman include (but are not limited to) the following: Undertake any environmental duties as defined by the Site Manager or Project/Site Engineer; Control field works and implement/maintain effective environmental controls; Where required, undertake environmental risk assessment of works prior to commencement; Participate in preparation of and ensure site activities comply with plans and relevant records are kept; Ensure all site workers are site inducted prior to commencement of works; Attend to any spills or environmental incidents that may occur on-site; Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Site Manager; and Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager, Site Manager or EHS Coordinator. Track environmental high risk construction observations.

Appendix C - Arup Construction Traffic and Pedestrian Management Sub-Plan

Appendix D – JBS&G Construction Soil and Water Management Sub-Plan

Appendix E – Stantec Construction Noise and Vibration Management Sub-Plan

Appendix F – Construction Waste Management Sub-Plan

Appendix G – Project Impact and Hazards Risk Assessment (IHRA)

Appendix H – EHS Site Inspection Checklist and Weekly Inspection Form