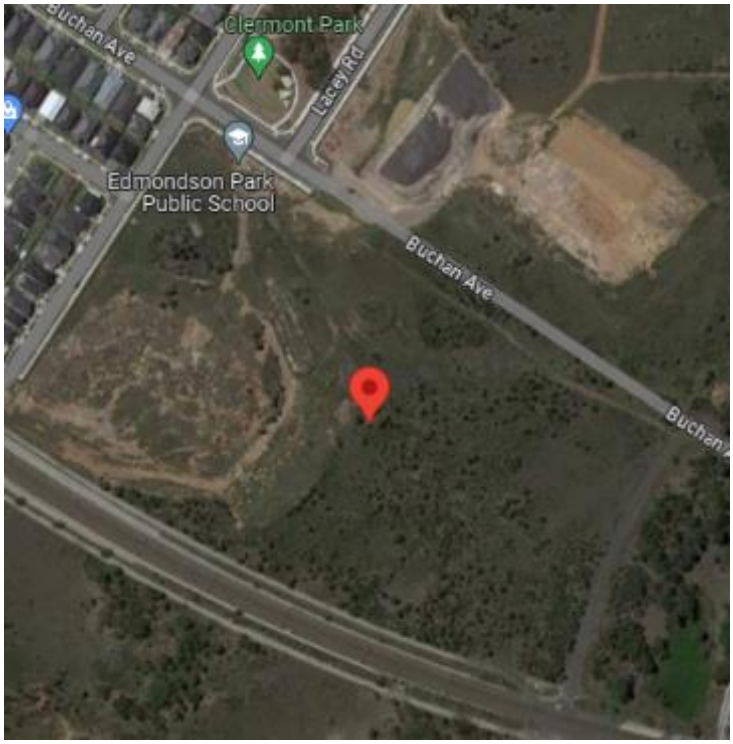
environmental management pty ltd

CONSTRUCTION WASTE MANAGEMENT SUB-PLAN (CWMSP)

New high school in Edmondson Park

Lot 2 in Deposited Plan (DP) 1287903



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Prepared for:	SCHOOL INFRASTRUCTURE NSW on behalf of the NSW DEPARTMENT OF EDUCATION

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DISCLAIMER
This report is based on information provided by School Infrastructure NSW. To that extent, this report relies on the accuracy of the information provided to the Consultant. This report is not a substitute for legal advice on the relevant environmental related legislation, which applies to businesses, contractors, or other bodies. Accordingly, EcCell Environmental Management will not be liable for any loss or damage that may arise out of this project.

DOCUMENT CONTROL				
ISSUE NUMBER	DATE	COMMENT	AUTHOR	REVIEW
Draft	5/07/2023	Issue	Patrick Nolan	Jo Drummond
Version 1	21/09/2023	Issue	Patrick Nolan	Jo Drummond
Version 2	23/10/2023	Issue	Patrick Nolan	Jo Drummond
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Version 4	23/10/2024	Issue	Patrick Nolan	Jo Drummond
Version 5	29/11/2024	Issue	Jesse Hayward	Jo Drummond

I, Jo Drummond, confirm this Construction Waste Management Sub-Plan (CWMSP) addresses the requirement of SEAR 21 Waste Management (with respect to construction waste management) and relevant State and local legislation, policies, and guidelines. I further confirm that none of the information contained in the Construction Waste Management Plan is false or misleading.

Jo Drummond

1 INTRODUCTION

This Construction Waste Management Plan (CWMSP) accompanies an Environmental Impact Statement (EIS) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), in support of a State Significant Development Application (SSDA) for the construction and operation of a new high school in Edmondson Park (SSD-62028458).

This report has been updated to addresses the SSD Consent Conditions B15, B25, C29, C30, C31, C32 and C33 issued for the project.

Table 1 – State Significant Development Application Conditions

Ref No.	SSD Condition Requirements	Report Reference
B15	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	- Section 4 Waste Management Strategies - Section 6,7,8 - REF JK Environments Detailed Site Investigation (DSI) Based on preliminary classification the site soil is General Solid Waste (non-putrescible) and In-situ Natural Soil and Bedrock.
B25	Prior to the commencement of the removal of any waste material from the site, the Applicant must notify the TfNSW Traffic Management Centre of the truck route(s) to be followed by trucks transporting waste material from the site.	- Refer to Traffic Management Plan
C29	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.	- Appendix B – Waste Collection / Bin Area
C30	All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	- Section 7 Construction Waste Classification and Quantities
C31	The Applicant must ensure that concrete waste and rinse water are not disposed of	- Ref Richard Crookes Construction Environmental Management Plan

	on the site and are prevented from entering any natural or artificial watercourse	
C32	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.	- Section 7 Construction Waste Classification and Quantities
C33	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.	- Section 4.4 and 4.5
D33	Prior to the commencement of operation of each relevant stage, 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 as set out in Appendix B - Mitigation Measures, dated 8 August 2024.	- Operational waste management arrangements are addressed in a separate Operational Waste Management Plan prepared by EcCell Environmental.

2 PROJECT DESCRIPTION

2.1 SITE DESCRIPTION

The site is located in the suburb of Edmondson Park in the South West Growth Area of Sydney, and within the Edmondson Park South State Significant Precinct. The site is located approximately 45 kms south-west of the Sydney central business district (CBD) and approximately 21 kms south of the Parramatta CBD. The site is located immediately south-east of Edmondson Park Public School, which opened in 2023.

The site is located within the Liverpool City local government area (LGA), has a street address of 145 Buchan Avenue, Edmondson Park and is legally described as Lot 2 in Deposited Plan (DP) 1287903. The site has a total area of 3.903 hectares.

The site is currently vacant, largely cleared of vegetation (with the exception of grasses and small shrubs). It has been previously utilised for construction access and as a compound for the construction of the primary school immediately west of the site. The primary school construction has been completed and is now operational.

The site has an approximate 15 m fall from the southwest boundary (RL 70.950) to the northeast boundary at Buchan Avenue (RL 55.220). Natural overland flow drains to a drainage culvert located at the north-east corner of the site.

Two (2) easements are identified adjacent to Buchan Avenue. A stormwater easement has been established to convey stormwater from the primary school through the site to Buchan Avenue, and a sewer easement has been established for the primary school along the northern boundary of the site.

The surrounding context of the site has experienced significant transformation due to the introduction of the south-west railway line and rapid housing growth in release areas that has seen transformation of greenfield sites to new communities.

Recent and proposed development immediately south and east of the site includes the recently constructed East Road and South Road and several proposed major residential developments. Edmondson Park town centre is situated to the south of the railway station, comprising a shopping centre and various residential flat building development.

Figure 1 – Site Location outlined and shaded in red, next to the Edmondson Park Public School on Buchan Avenue, Edmondson Park. (Source: NSW Department of Education)

2.2 PROJECT DESCRIPTION

The proposed development comprises a new high school in Edmondson Park accommodating 2,000 students, approximately 124 full time staff and 20 support staff. A detailed description of the proposal is as follows:

1. Land use for the purpose of an educational establishment.
2. Bulk earthworks, comprising fill and excavation and other site preparation works.
3. Construction of four (4) new buildings for the proposed high school for a range of educational uses and ranging in height from one (1) to five (5) storeys.
4. Landscaping and public domain works, including tree planting, low lying landscaping, a sensory garden, a large sports field in the mid-west portion of the site and three sports courts in the south-west portion of the site.
5. An on-site staff carpark and waste collection area at the southern end of the site, accessible from South Road.
6. Signage for the new school.
7. Public domain and infrastructure works, including some offsite works outside the high school boundary within the Buchan Avenue, East Road and South Road reserves.

The construction and operation of the proposed high school will be staged as follows.

Table 2 – Construction and operation stages

Stage	Intent	General Description
Stage 1	Construct Stage 1 works to provide a school accommodating approximately 800 students and 63 staff	Construction of Stage 1 works including: - Earthwork to be undertaken across the entire extent of the site. - Public domain works that will occur outside the high school site boundary. - The construction of Building A, D and the northern part of Building B. - The construction of landscape works adjacent to the buildings that are being completed in Stage 1. - The waste collection area and the staff carpark. Operation of the Stage 1 school with approximately 800 students and 63 staff.
Stage 2	Ongoing operation of the Stage 1 school and construction of Stage 2 comprising the remaining school facilities to enable final operation of the school at 2,000 students and approximately 144 staff	Ongoing operation of the Stage 1 school. Construction of Stage 2 works including: - The construction of Building C and the southern part of Building B. - The construction of the remaining landscape works. - Refurbishment of the library and science labs in Building A, and the kitchen in Building B. Operation of the completed development accommodating 2,000 students and 144 staff.

3 OPERATIONAL DETAILS

3.1 OPERATING HOURS

The following breakdown of construction operation hours provides an overview of the anticipated activities throughout the construction stage.

Table 3 – Construction operation hours

Activities	Operating Hours
C3 - 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.
C4 -Notwithstanding condition C3, 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.
C5 - Construction activities may be undertaken outside of the hours in condition C3 and C4 if required: C6 - Notification of such construction activities as referenced in condition C5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.	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) by the relevant roads authority or utilities service provider in order to minimise disruption to the roadway or essential services, where the related works have been provided to the Planning Secretary and affected residents at least seven days prior to the works; or f) where a variation is approved in advance in writing by the Planning
C7 - 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.

The purpose of this CWMSP is to meet the key legislative waste requirements of the new high school in Edmondson Park, which will be delivered over two primary stages (and various sub-stages as set out in Section 2.2 of this report).

This CWMSP has been prepared by EcCell Environmental on behalf of the Applicant Richard Crookes Constructions. It accompanies an Environmental Impact Statement (EIS) in support of State Significant Development Application (SSD-62028458) for the new high school in Edmondson Park, which is to be located at 145 Buchan Avenue, Edmondson Park, legally described as Lot 2 in Deposited Plan (DP) 1287903.

3.2 NSW LEGISLATIVE REQUIREMENTS AND GUIDELINES

Relevant key legislation and guidelines applicable to the project include:

- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment (General) Operations Act 1998*
- *Waste Avoidance and Resource Recovery Act 2014*
- Protection of the Environment Operations (Waste) Regulation 2014
- Waste Classification Guidelines (EPA, 2014)
- NSW Department of Planning and Environment, Secretary's Environmental Assessment Requirements (SEARs), and
- State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP).

4 WASTE MANAGEMENT STRATEGIES

4.1 SERVICING ARRANGEMENTS

The current NSW legislation determines that the generator of waste is the owner of the waste until the waste crosses a calibrated weighbridge into a licensed facility which is Green Star accredited. The waste contractor contracted to Richard Crookes Constructions is the primary transporter of waste off-site. Accordingly, the waste contractor will be required to provide verifiable monthly reports on waste reused, reprocessed, or recycled (diverted from landfill) and the waste sent to landfill. These reports have a direct bearing on not only the generator's compliance with the relevant State and Council regulations.

The CWMSP will be implemented on-site throughout, including singularly or collectively through the structural phase and through the fit-out phases of construction.

A Waste Data File will be maintained on-site by Richard Crookes Constructions containing the Waste Contractor's monthly reports and all other entries including:

- The classification of the waste
- The time and date of material removed
- A description of and the volume of waste collected
- The location and name of the waste facility that the waste is transferred to, and
- The vehicle registration and the name of the waste contractor's company.

The Waste Data File will be made available for inspection to any authorised officer at any time during the life of the site's works. At the conclusion of the site's works, the designated person will retain all

waste documentation and make this validating documentation available for inspection should it be required.

Arrangements will be made for Richard Crookes Constructions and the Waste Contractor to increase or reduce bin supply if there is an unexpected increase or decrease in waste generation.

4.2 CONSTRUCTION WASTE MANAGEMENT EQUIPMENT, BIN SIZES AND COLLECTION FREQUENCY

All waste will be removed by a licensed waste contractor using $2m^3$ to $15m^3$ and if co-mingled to $20m^3$ bins on the site. Construction Waste will be collected from the entrance of South Road and transported by a Green Star Accredited Waste Contractor to a Green Star Accredited Waste Facility.

4.3 ROLES AND RESPONSIBILITIES

Table 4 represents the breakdown of roles and responsibilities for the SSDA design requirements by the design team

Table 4 - Breakdown of Roles and Responsibilities for all construction stages of the project

RECOMMENDED WASTE MANAGEMENT STRATEGIES	RESPONSIBILITY
Design	
Use of modular components in design.	Richard Crookes Constructions
Use of prefabricated components in design.	Richard Crookes Constructions
Design for materials to standard sizes.	Richard Crookes Constructions
Design for operational waste minimisation as per the requirements of the OWMP	Richard Crookes Constructions
Consider ways to avoid, reuse and recycle construction wastes.	Richard Crookes Constructions
Procurement	
Select recycled and reprocessed materials.	Richard Crookes Constructions
Select components that can be reused after deconstruction.	Richard Crookes Constructions
Prioritise suppliers that take back off-cuts and unused product.	Richard Crookes Constructions
Encourage contractors and subcontractors that use unneeded off-cuts and unused product for use on other projects.	Richard Crookes Constructions
Ordering the right quantities of materials (Purchasing Policy).	Richard Crookes Constructions
Pre-construction	
The Waste Management Plan to be reviewed and approved prior to construction.	Richard Crookes Constructions
Contract a Green Star Accredited Waste Contractor.	Richard Crookes Constructions
Construction on-site	
Prioritise and implement the *'avoid, reuse, reduce, recycle'* principles.	Richard Crookes Constructions
Minimise recurring packaging materials.	Richard Crookes Constructions
Returning packaging to the supplier.	Richard Crookes Constructions
Separation of recycling of materials off-site.	Richard Crookes Constructions
Audit and monitor the correct usage of bins.	Richard Crookes Constructions
Audit and monitor the Waste Contractor.	Richard Crookes Constructions

4.4 MANAGEMENT OF HAZARDOUS WASTE

Removal of any excavation waste from site will be classified by a suitably qualified environmental consultant as per Waste Classification Guidelines Part 1: Classifying Waste NSW EPA 2014 including:

- Virgin excavated natural material
- ENM in accordance with Excavated Natural Material Order 2014
- Asbestos
- Disposal dockets (for non VENM/ENM) from landfill will be provided and kept in a Waste Data File on-site
- Material tracking/dockets will be provided for VENM/ENM
- Disposal facility will have appropriate licence to receive the waste in accordance with the waste classification, and
- If required a Remedial Action Plan will be prepared.

A Waste Data File will be maintained on-site and all entries will include hazardous waste stating the following:

- The classification of the hazardous waste
- The license of the facilities that can accept the hazardous waste material
- The time and date of material removed
- A description of and the volume of waste collected
- The location and name of the waste facility that the waste is transferred to
- The vehicle registration and the name of the waste contractor's company, and
- Disposal dockets.

The Waste Data File will be made available for inspection to any authorised officer at any time during the life of the site works. At the conclusion of site works, the designated person will retain all waste documentation and make this validating documentation available for inspection.

4.5 UNEXPECTED FINDS PROTOCOL

An unexpected find can be defined as:

- Buried or surface asbestos containing materials (Bonded, Friable or other)
- Buried waste materials e.g. plastic pipes, electrical cable, etc.
- Septic or underground storage tanks
- Animal burial pits, or
- Discoloured and odorous soils and groundwater/seepage.

Should an unexpected find of potential contamination be encountered during the works, the following procedure should be followed:

- Cease work as soon as safe to do so and move clear of the finding
- Do not tamper or attempt to remove the finding
- Contact Richard Crookes Constructions immediately

- Site Management to delineate an exclusion or quarantine zone around the area using fencing and or appropriate barriers and signage
- Preliminary assessment of the find and need for immediate management controls, and
- Further assessment and/or remediation works are required and how such works are to be undertaken in accordance with contaminated site regulations and guidelines

Any unexpected finds must be:

- Documented, and records of volumes and types of materials identified removed from the site must be kept on file, and
- Receipt documentation from the licensed facility confirming volume received.

5 WASTE MANAGEMENT PLAN APPLICATION

PROJECT:
New high school in Edmondson Park.
ADDRESS:
Lot 2 in Deposited Plan (DP) 1287903.
OWNERS:
Minister for Education and Early Learning.
DETAILS OF APPLICANT
School Infrastructure NSW for the NSW Department of Education.
DESCRIPTION OF BUILDINGS AND OTHER STRUCTURES CURRENTLY ON THE SITE:
This school is planned to be built on a greenfield site and will be a completely new school. The site is currently vacant and has been used as a construction compound for the construction of the (now completed) adjacent primary school.
BRIEF DESCRIPTION OF PROPOSAL:
The new high school in Edmondson Park is in the LGA of Liverpool City Council, a new Stream 12 High School Years 7-12 Project and will accommodate 2,000 students. The new high school in Edmondson Park High School project will be delivered over two stages as follows: • Stage 1, delivery of new services to accommodate capacity of 800, and • Stage 2 - Delivery of remaining services and structures to accommodate a combined 2,000 students and facilities. This CWMSP addresses Stage 1
WASTE - IF MATERIALS/WASTE IS REUSED ON-SITE OR OFF-SITE, HOW WILL IT BE REUSED?
The ground surface is comprised of exposed clay and vegetation (grass, shrubs and weeds) in good condition. Approximately 5,855m^3 of excavated material which will be re used back on-site for levelling and footings, foundations and fill around the site .

	Name	Signed	Contact Number	Date
Prepared by:	Jo Drummond	Jo Drummond	0412 214 233	21/11/2024

6 PROJECT EXCAVATION STAGES 1

Material Type on Site	Estimated Volume (m^3) or Weight (t) (Most Favourable → Least)			ON-SITE TREATMENT	OFF-SITE TREATMENT	
	Reuse	Recycling	Disposal	Proposed Reuse and/or Recycling Collection Methods	Disposal / Transport Contractor	Waste Depot, Recycling Outlet or Landfill Site
Excavated On-site Natural Material (ENM) tested as a Greenfield site. 150 mm of excavation over 3.903 hectares of site	Excavated and reused on-site footings and gardens. 5,855m^3			There is 5,855m^3 generated on-site used for site levelling and footings, foundations and fill around the site.	TBA	Reused back on site for landscaping.
Sub Total	**5,855m^3**			> Site's surface is 3.903 hectares and will be stripped by 150mm generating 5,855m^3 of on-site cut and fill.		
TOTAL	**5,855m^3**					

Narrative:

Excavated On-site Natural Material (ENM) tested as a Greenfield site and will be reused back onsite.

REF JK Environments Detailed Site Investigation (DSI) Date: 1 March 2024 Ref: E35730PTrpt3rev1

Based on preliminary classification the site soil is General Solid Waste (non-putrescible) and In-situ Natural Soil and Bedrock.

7 STAGE 1 CONSTRUCTION WASTE CLASSIFICATION AND QUANTITIES

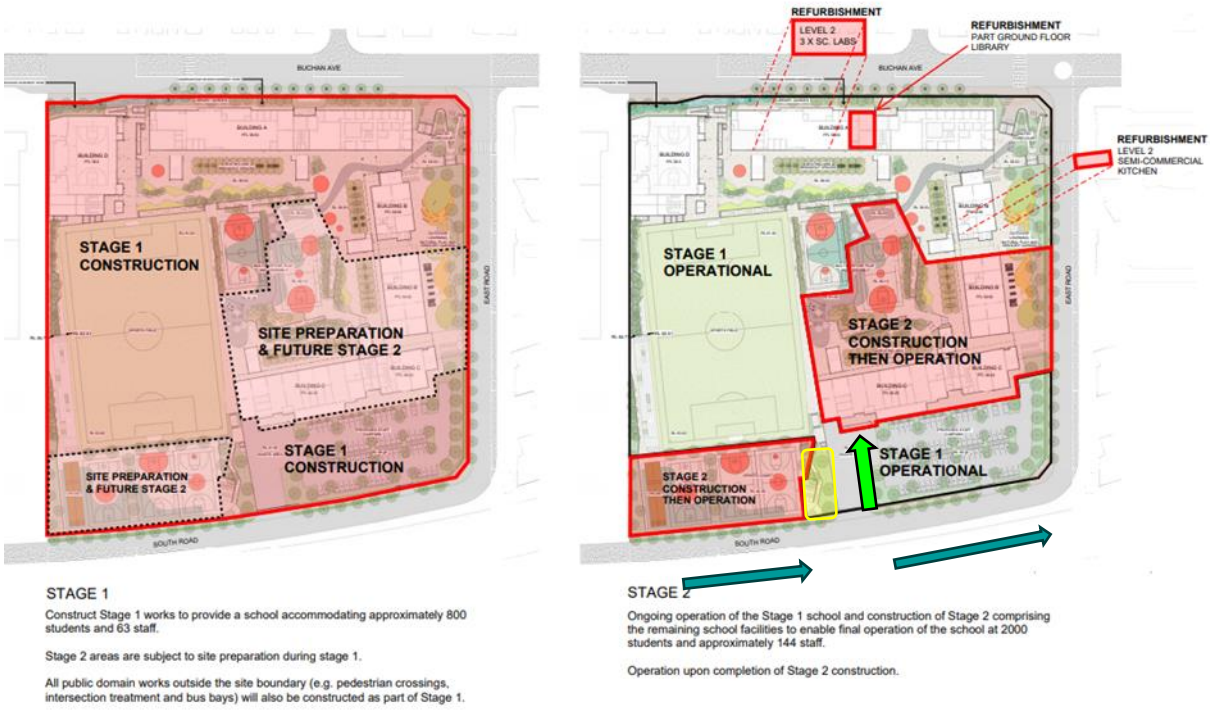
Material Type	Estimated Volume (m^3) or Weight (t) (Most Favourable → Least)			ON-SITE TREATMENT	OFF-SITE TREATMENT	
	Reuse On-Site	Recycling	Disposal	Proposed Reuse and/or Recycling Collection Methods	Disposal / Transport Contractor	Waste Depot, Recycling Outlet or Landfill Site
Concrete, Brick, Blockwork and Tile	$50m^3$	$460m^3$		Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 Crushed for road base
Metals	$30m^3$	$260m^3$		Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 Scrap Metal Dealer for smelting
Timber off-cuts	$100m^3$	$390m^3$		Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 Recycled for chips and mulch
Cardboard	$30m^3$	$480m^3$		Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 Recycled into cardboard
Plasterboard	$60m^3$	$570m^3$		Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 Recycled as soil conditioner
Plastics, ^plastic packaging, *paint drums and containers	$50m^3$		$160m^3$	Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 ^ Styrene and plastic to landfill * Paint drums nested and recycled
Pallets and Reels		215 pallets		Separated on-site	TBA	Returned to the supplier
Liquid Waste			900 lit	Separated on-site	TBA	Transferred to licenced waste reducer

Material Type	Estimated Volume (m^3) or Weight (t) (Most Favourable → Least)			ON-SITE TREATMENT	OFF-SITE TREATMENT	
	Reuse On-Site	Recycling	Disposal	Proposed Reuse and/or Recycling Collection Methods	Disposal / Transport Contractor	Waste Depot, Recycling Outlet or Landfill Site
General Waste			560m^3	Co-mingled Bins or separate	Purple Cow	Bingo Eastern Creek Environmental Protection License, 20121 Transferred to licenced landfill
Sub Total	**320m^3**	**2,160m^3**	**720m^3**	Paint washout estimated to be 900 litres to be taken off-site and reprocessed by trade		
TOTAL	**3,200m^3**			NB: Plus, an additional 215 pallets (single units returned to suppliers for reuse)		
Narrative: Waste will be co-mingled and taken over a weighbridge to a Green Star Accredited Facility by a Green Star Accredited Waste Contractor to be separated and recycled off-site as the bins are filled.						

8 APPENDIX A: EXCAVATION AREA

New high school in Edmondson Park site boundary and topography (approximate). (Illustration: JK Environments)

9 APPENDIX B: STAGE 1 CONSTRUCTION WORKS AREA



Site Plan, Building Locations and Layout of Sporting Facilities. (Source: NBRS Architects and JKE)

	Waste collection/Bin Area
	Street Access