

Belmont Desalination Plant Project

Construction Environmental Management Plan

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Revisions and Distribution

Revisions

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Draft issues of this document are identified as Revision A, B, C, etc. Upon initial issue (generally Contract Award) this will be changed to a sequential number commencing at Revision 0. Revision numbers will continue at Revision 1, 2, etc.

Rev	Date	Prepared by	Signature	Reviewed by	Signature	Approved by	Signature	Remarks
A	13/03/2024	A. Grant	AG	ER		HWC		Submission to HWC and ER
В	15/07/2024	A. Grant	AG	ER		HWC		Update Post Modification
0	17/09/2024	A Grant	AG	ER		HWC		Following ER / HWC Comments
1	14/10/2024	A Grant	AG	ER		HWC		Following DPHI Comments
2	19/11/2024	A Grant	AG	ER		HWC		Following DPHI Comments Round 2

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Terms and Abbreviations

Term/Abbreviation	Definition/Expanded text
CEMP	Construction Environmental Management Plan
СоА	Conditions of Approval
CS	Communication Strategy
CSE	Community and Stakeholder Engagement
DPHI	Department of Planning, Health and Infrastructure
ECMs	Environmental Control Maps
ECPs	Environmental Control Plans
EIS	Environmental Impact Statement
EMS	Environmental Management System
Environmental	A collective term utilised to refer to all of the following:
Approval	Belmont Desalination Plant Drought Response EIS
Documentation	Belmont Desalination Plant Drought Response - Response to Submissions Report
	Amendment Report and Additional RTS
	Modification Report
	Modification Report RTS
EP&A Act	Environmental Planning and Assessment Act 1979
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPL	Environment Protection Licence
ER	Environmental Representative
ESCP	Erosion and Sediment Control Plans
EWMS	Environmental Work Method Statement
HSE	Health, Safety and Environmental
HWC	Hunter Water Corporation
IMS	Integrated Management System
ISCA	Infrastructure Sustainability Council of Australia
JH	John Holland Pty Ltd
LALC	Local Aboriginal Land Council
LGAs	Local Government Areas
LMCC	Lake Macquarie City Council
NML	Noise Management Level
NSW EPA	NSW Environment Protection Authority
OEMP	Operational Environmental Management Plan
OOHW	Out of Hours Works
PDCA	Plan-Do-Check-Act
PESCPs	Progressive Erosion and Sediment Control Plans
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
RAPs	Registered Aboriginal Parties
REMMs	Revised Environmental Management Measures
RTS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
SMP	Sustainability Management Plan
TfNSW	Transport for NSW



Plan Profile

Management System	The Project will use John Holland's Environmental Management System (EMS) and core Project plans to support Project delivery, additional functional plans have been developed for the Project.
Name	Construction Environmental Management Plan (CEMP)
Authorisation	All personnel employed on the Project will perform their duties in accordance with the requirements of this CEMP and in compliance with Project system procedures and any specific Project instructions.
	This Plan is authorised by the Project Director.
Review and update	The CEMP will be regularly reviewed, developed, and updated:
	For changes in design or construction sequence, staging, methodology or resourcing
	To consider progress of the Project Company's Work
	For changes in access to the Project Site
	To consider changes directed by Hunter Water



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1. Introduction

1.1. Background

John Holland (JH) has been appointed by Hunter Water Corporation (HWC) for the Design and Construct (D&C) contract for Belmont Operational Availability Desalination Plant. The approved Project (as modified) involves the construction and operation of a permanent operational availability desalination plant producing up to 30 megalitres per day (ML/d) including seawater intake infrastructure; desalination units; brine discharge via existing ocean outfall; electricity/water supply; and ancillary works.

The approved Project is being developed on land (Part Lot 1 DP 433549) at 12a Ocean Park Road, Belmont South ('the Project area') that comprises a portion of the Belmont Wastewater Treatment Works (WWTW) which is located to the southeast of the town of Belmont, NSW within the Lake Macquarie City Council (LMCC) local government area (LGA). Belmont Lagoon, Cold Tea Creek and the residential area of Belmont is located to the west, with the Tasman Sea bordering the site to the east and south. The existing Belmont WWTW is adjacent to the site to the north.

An Environmental Impact Statement (EIS) and Response to Submissions and Amendment Report (referred to as the Amendment Report in this report) were submitted to the Department of Planning and Housing and Infrastructure (DPHI) in November 2019 and August 2020 respectively, for the State Significant Infrastructure (SSI) project.

The Modification EIS was exhibited by the DPHI from 24 January 2024 to 20 February 2024. During the exhibition of the Modification EIS, 22 submissions were received from government agencies, and 11 from individual stakeholders, via the planning portal for a total of 22 submissions. A Submissions Report was prepared in May 2024 and made available via the Portal.

1.2. Purpose of this CEMP

- This CEMP and associated Sub-Plans have been prepared to outline how the Project will implement the construction activities in accordance with the following requirements:
- NSW Infrastructure Approval (SSI-8896)
- The Project Environmental Assessment documents:
 - Hunter Water Corporation Belmont Drought Response Desalination Plant Environmental Impact Statement, prepared by GHD and dated November 2019
 - Hunter Water Corporation Belmont Drought Response Desalination Plant Amendment Report and Response to Submissions Report, prepared by Hunter Water and dated June 2020.
 - Hunter Water Corporation Belmont Drought Response Desalination Plant Modification Report, prepared by Jacobs and dated January 2024
 - Hunter Water Corporation Belmont Drought Response Desalination Plant Modification Report Response to Submissions Report, prepared by Jacobs and dated 13th May 2024
- The requirements of the Environmental Management Plan Guideline for Infrastructure Projects (DPE, 2020) as required by Condition C10 of the Project Approval.

Additionally, the CEMP and Sub-Plans outline how the Project will minimise environmental risks and achieve environmental outcomes by providing a structured approach to ensure appropriate Revised Environmental Management Measures (REMMs) and controls are implemented.

This CEMP:

- Provides a description of Project construction activities and program.
- Details environmental obligations attached to the Project.
- Identifies hazards and risks associated with Project construction and details processes for their initial and ongoing assessment and management.
- Details environmental management policies, guidelines, and principles to be implemented during Project construction.



- Details how the performance outcomes, commitments and mitigation measures specified in the Project Approval documentation will be implemented and achieved during Project construction.
- Details how construction activities will be carried out to meet performance outcomes and mitigate risks, minimise environmental impacts, and prevent unauthorised environmental harm.
- Details the inspection and monitoring program for ongoing assessment of Project environmental compliance and provides procedures for identification and rectification of environmental non-compliances and unauthorised environmental harm.
- Details protocols and procedures for managing, rectifying, and reporting environmental non-compliances and incidents.
- Details organisational roles and responsibilities of relevant Project personnel as they relate to environmental management during construction of the Project and their relationship with the Environmental Representative (ER).
- Details training and induction of Project personnel in relation to environmental and compliance obligations.
- Details the management plans, Sub-Plans, Protocols, and Procedures that support this CEMP.
- Details the process for review and update to this CEMP and all associated Sub-Plans and programs.

On approval of the CEMP, the Project will commence Construction Work and any low impact works such as investigations (i.e. as defined in the definition of construction in the Project Approval) will be undertaken in accordance with the approved CEMP.

Also excluded are plans for operation of the Project, which will be managed under an Operational Environmental Management Plan (OEMP).

1.3. Conditions of Approval – SSI-8896

The requirements of the applicable Conditions of Approval (CoA) and where they are met in this CEMP are shown in Table 1-1.

Note: Where an CoA is specifically addressed in a Sub-Plan, these have not been included in the table below.

Table 1-1 CoA requirements for CEMP

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CoA	Requirement	CEMP Reference	
A8	Where the conditions of this approval require consultation with an identified party, the Proponent must:	Section 2 Relevant Sub-Plans	
	(a) consult with the relevant party prior to submitting the subject document to the Planning Secretary for approval; and		
	(b) provide details of the consultation undertaken including:	_	
	(i) the outcome of that consultation, matters resolved and unresolved; and		
	(ii) details of any disagreement remaining between the party consulted and the Proponent and how the Proponent has addressed the matters not resolved;		
A17	Before the commencement of construction, the Proponent must:	Covered in CTPMP	
	(a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure;		
	(b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and		
	(c) submit a copy of the dilapidation report to the Planning Secretary and Council.		
A20	The external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA	Section 3.2.2	
A21	References in the conditions of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.	Noted	
422	However, consistent with the conditions of this approval and without altering any limits or criteria in this approval, the Planning Secretary may, when issuing directions under this approval in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, Standard or policy, or a replacement of them.	Noted	

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	СоА	Requirement	CEMP Reference
	A23	Any condition of this approval that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing.	Noted
		monitoring of the development to provide data on compliance with the approval or on the environmental impact of the development, and an "environmental audit" is a periodic or particular documented evaluation of the development to provide information on compliance with the approval or the environmental management or impact of the development.	
	A24	At least 48 hours before the commencement of construction until the completion of all works under this approval, or such other time as agreed by the Planning Secretary, the Proponent must:	Managed by HWC, JH to provide relevant information as
		(a) make the following information and documents (as they are obtained or approved) publicly available on its website:	required
		(i) the documents referred to in condition A2 of this approval;	
		(ii) all current statutory approvals for the development;	
		(iii) all approved strategies, plans and programs required under the conditions of this approval;	
		(iv) regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval;	
		(v) a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs;	
		(vi) a summary of the current stage and progress of the development;	
		(vii) contact details to enquire about the development or to make a complaint;	
		(viii) a complaints register, updated monthly;	
		(ix) audit reports prepared as part of any independent audit of the development and the Proponent's response to the recommendations in any audit report;	
		(x) any other matter required by the Planning Secretary; and	
		(b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	
	A26	The Planning Secretary must be notified through the major projects portal immediately after the Proponent 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.	Section 4.8
	A27	Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix 1.	Section 4.9
	A28	The Planning Secretary must be notified through the major projects portal within seven days after the Proponent becomes aware of any non-compliance. The Certifier and/or ER must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	Section 4.9
	A31	Within three months of:	Section 4.12.2
		(a) the submission of a compliance report under condition A34;	
		(b) the submission of an incident report under condition A27;	
		(c) the submission of an Independent Audit under condition D36 or D37;	
		(d) the approval of any modification of the conditions of this approval; or	
		(e) the issue of a direction of the Planning Secretary under condition A2 which requires a review, the strategies, plans and programs required under this approval must be reviewed, and the Planning Secretary and the ER and Certifier must be notified in writing that a review is being carried out.	
	A37	All plant and equipment used on site, or to monitor the performance of the development must be:	Section 4.2.9
		(a) maintained in a proper and efficient condition; and(b) operated in a proper and efficient manner.	



СоА	Requirement	CEMP Reference
B1	Before the commencement of construction, a Community Consultative Committee (CCC) must be established for the development in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016). The CCC must begin to exercise functions in accordance with such Guidelines before the commencement of construction and continue to do so for the duration of construction, the first year operation and for at least six months following the completion of decommissioning. Note: • The CCC is an advisory committee only. • In accordance with the Guidelines, the Committee should comprise an independent chair and appropriate representation from the Proponent, Council and the local community.	To be established and managed by HWC Construction will not commence until a CCC has been established in accordance with DPHI guidelines.
B2	No later than one month before the commencement of construction, a Community Communication Strategy must be prepared and submitted to the Planning Secretary for approval. The Community Communication Strategy is to provide mechanisms to facilitate communication between the Proponent, the Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development. The Community Communication Strategy must: (a) assign a central contact person to keep the nearby sensitive receivers regularly informed throughout the development; (b) detail the mechanisms for regularly consulting with the local community throughout the development such as holding regular meetings to inform the community of the progress of	Document will be developed separately to CEMP
	the development and report on environmental monitoring results; (c) detail a procedure for consulting with nearby sensitive receivers to schedule high noise	
	 (d) include contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders; and 	
	(e) include a complaints procedure for recording, responding to and managing complaints, including:	
	 (i) email, toll-free telephone number and postal addresses for receiving complaints; (ii) advertising the contact details for complaints before and during operation, via the local newspaper and through on-site signage; (iii) a complainte register to receive the data, time, and nature of the complaint, data is a fit of the complaint. 	
	(iii) a complaints register to record the date, time and nature of the complaint, details of the complainant and any actions taken to address the complaint; and	
	(iv) proceedings for the resolution of any disputes that may also during the course of the development.(f) detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition C29 and blasting activities including.	
	 (i) justification and description of the potential work, location and duration of the out-of-hours work; (ii) the standard duration of the potential work of the standard duration of the out-of-hours work; 	
	(ii) the noise characteristics and likely noise levels of the construction / activity(ies) being undertaken; (iii) mitigation and management measures which aim to achieve the relevant NMLs and	
	vibration criteria under Conditions D13 and D16 (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers); and (iv) respite periods	
В4	A Complaints Management System must be prepared and implemented before the commencement of any Work and maintained for the duration of Work and for a minimum for 12 months following completion of construction of the SSI.	Section 4.7 Communication Strategy Complaints Management System
B5	The following information must be available to facilitate community enquiries and manage complaints before the commencement of Work and for 12 months following the completion of construction:	Section 4.7 Complaints Management System
	A 24-hour telephone number for the registration of complaints and enquiries about the SSI;	Mediation process
	A postal address to which written complaints and enquires may be sent;	Included in Community
	An email address to which electronic complaints and enquiries may be transmitted; and A mediation system for complaints unable to be resolved.	Communications Strategy

	This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	
B6	 A Complaints Register must be maintained recording information on all complaints received about the SSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) number of people in the household affected in relation to a complaint; ©any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; and (d) means by which the complaint was addressed and whether resolution was reached, with or without mediation. 	Section 4.7.4 Complaints register managed by JH. All complaints received by JH will be reported to HWC as required
B7	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request. Personal details of complainants must be provided where this is consistent with the Proponent's privacy statement, notice or policy. Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.	Section 4.7.4 Complaints register managed by JH. All complaints received by JH will be reported to HWC as required. A copy of the Complaints Register will be provided to the Department upon request.
38	 A website or webpage providing information in relation to the SSI must be established prior to the commencement of work and maintained for the duration of construction, and for a minimum of three years following the commencement of operation. Up-to-date information (excluding confidential, private and/or commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including: (a) information on the current implementation status of the SSI; (b) a copy of the documents listed in Condition A2 and A3 of this approval, and any documentation relating to any modifications made to the SSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister or delegate, to a modification of the terms of this approval, or links to the referenced documents where available; (d) a copy of each statutory approval, licence or permit required and obtained in relation to the SSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website; € a current copy of each document required under the terms of this approval, which must be published within one week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and (f) a copy of the compliance and audit reports required under this approval. 	Managed by HWC, JH to provide information to HWC as required
C4	Prior to the commencement of construction, the Proponent must provide the Planning Secretary with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA.	Section 3.2.2
25	 Prior to the commencement of construction, the Proponent must: (a) consult with the relevant owner and provider of services that are likely to be affected by the development to make suitable arrangements for access to, diversion, protection and support of the affected infrastructure; (b) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (c) submit a copy of the dilapidation report to the Planning Secretary and Council 	Requirement addressed in CTPMP
C6	Prior to the commencement of construction, the Proponent must submit a pre- commencement dilapidation report to Council and relevant property owners along Beach Street and Ocean Park Road. The report must provide an accurate record of the existing condition of adjoining private properties, and Council assets that are likely to be impacted by the proposed works.	Requirement addressed in CTPMP



СоА	Requirement	CEMP Reference		
C7	 Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Proponent must demonstrate that ESD is being achieved by either: (a) registering for a minimum rating with the Infrastructure Sustainability Council of Australia's (ISCA) Infrastructure Sustainability (IS) rating scheme and submit evidence of registration to the Planning Secretary; or (b) seeking approval from the Planning Secretary for an alternative certification process. 	Section 1.6		
C8	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifier that all outdoor lighting within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.			
C9	Prior to the commencement of construction, demolition work plans required by AS 2601-2001 The demolition of structures (Standards Australia, 2001) must be accompanied by a written statement from a suitably qualified person that the proposals contained in the work plan comply with the safety requirements of the Standard. The work plans and the statement of compliance must be submitted to the Certifier	No demolition required		
C10	Management plans required under this approval must be prepared having regard to the relevant guidelines, including but not limited to the Environmental Management Plan Guideline: Guideline for Infrastructure Projects (DPIE April 2020). Note: • The Environmental Management Plan Guideline is available on the Planning Portal	Entire CEMP		
C11	Prior to the commencement of construction, the Proponent must submit a Construction Environmental Management Plan (CEMP) to the to the Planning Secretary for approval. The CEMP must include, but not be limited to, the following:	This CEMP		
	(a) Details of:	Section 4.6		
	(i) hours of work;(ii) 24-hour contact details of site manager;	Section 4.3		
	(iii) management of dust and odour to protect the amenity of the neighbourhood;	Section 4.2.9		
	(iv) groundwater management plan including measures to prevent groundwater contamination;	Appendix I		
	(v) external lighting in compliance with AS 4282-2019 Control of the obtrusive effects of outdoor lighting;	Section 3.1.5		
	(vi) management of public access to the surrounding areas during construction, including details of no-go zones and how these will be implemented;	Section 4.2.11		
	Communication Strategy required by condition B2;	Section 4.7.3		
	(viii) local sourcing of marine vessels;	Section 4.7.4		
	(b) an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communications	Appendix E		
	(c) Offshore Construction Works Management Sub-Plan (see condition C13):	Appendix J		
	(d) Biodiversity Management Sub-Plan (see condition C14):	Appendix B		
	(e) Construction Soil and Water Management Sub-Plan (see condition C15):	Appendix C		
	(f) Flood Emergency Response (see condition C16);	Appendix D		
	(g) Aboriginal Cultural Heritage Management Sub-Plan (see condition C17):	Appendix E		
	(h) Construction Traffic and Pedestrian Management Sub-Plan (see condition C18):	Appendix F		
	(i) Construction Noise and Vibration Management Sub-Plan (see condition C19):	Appendix G		
	(j) Construction Waste Management Sub-Plan (see condition C20):	Appendix H		
C12	The Proponent must:	Section 2.2		
	 (a) not commence construction of the development until the CEMP is approved by the Planning Secretary; and (b) carry out the construction of the development in accordance with the CEMP approved by the Planning Secretary and as revised and approved by the Planning Secretary from time to time. 			
C21	Prior to the commencement of construction, a landscaping plan must be submitted to the Planning Secretary for approval. The plan:	Appendix L		

СоА	Requirement	CEMP Reference
	(a) must include a monitoring program for the revegetation of the dunal system (eastern boundary of the site), southern perimeter, and identify planting opportunities along the northern and western site boundaries; and	
	(b) should maximise opportunities for visual fragmentation and/or screening of the site from the east and west.	
C23	Prior to the commencement of earthworks, the Proponent must prepare an unexpected contamination procedure to ensure that potentially contaminated material is appropriately managed. Where any material identified as contaminated is to be disposed off-site, the disposal location and results of testing submitted to the Planning Secretary prior to its removal from the site.	Appendix C
C29	Out-Of-Hours Work Protocol – Works Not Subject to an EPL	Appendix G
	Prior to the commencement of construction an Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of construction which is outside the hours defined in Condition D3. The Protocol must be prepared in consultation with the ER, and must provide:	
	a) justification for why these Construction activities need to be undertaken;	
	b) Identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:	
	I. the ER review all proposed out-of-hours activities and confirm their risk levels,	
	II. Iow risk activities can be approved by the ER, and	
	The risk assessment(s) must be based on a risk assessment carried out in accordance with	
	AS/NZS ISO 31000:2018 "Risk Management";	
	vibration criteria;	
	 a process for selecting and implementing mitigation measures for residual impacts in consultation with impacted sensitive receivers at each affected location. The measures must take into account the predicted noise levels (based off worst case work scenarios and where mitigation measures will be implemented) and the likely frequency and duration of the out-of-hours works that sensitive receivers would be exposed to, including the number of noise awakening events; 	
	e) details of respite periods consistent with the requirements developed in consultation with	
	 f) procedures to facilitate the coordination of out-of-hours work including those approved by an EBL or undertaken by a third party, to approve approve approve approved by 	
	 a) an EPE of undertaken by a time party, to ensure appropriate respite is provided, and g) notification arrangements in accordance with Condition B2(f) and notification to the Planning Secretary of approved low risk out-of-bours works. 	
	The Protocol must be submitted to and approved by the Planning Secretary before the commencement of out-of-hours work. The approved Protocol must be implemented for the duration of Construction. The Planning Secretary may revoke the Out-of-Hours Work approval subject to ongoing community complaints.	
	The Protocol does not apply if the requirements of Condition D4(a) or (b) or (d) are met, or if the Construction activity(ies) is subject to an EPL or if a negotiated agreement is made with the impacted sensitive receivers.	
	Notes:	
	 If Construction is regulated by the EPA via an EPL, the management of the activity or Construction must not be co-regulated under the Protocol. The Protocol process must only be used if the Construction activity is not covered by an EPL, including in circumstances where the activity or Construction did not commence under an EPL. 	
	 If the Construction activity(ies) is subject to an EPL and the EPA does not endorse extended hours as part of the EPL, the extended hours cannot be considered under this Protocol. 	
	 Any Planning Secretary approval for Out-of-Hours Work may be subject to trial requirements. 	
	 The intent of the protocol is to provide an assessment framework for short term intermittent activities undertaken out of hours. These activities should be consistent with those identified in the documents listed in Condition A2. Any long term out-of- hours-work not assessed in the documents listed in Condition A2 may need a future 	

СоА	Requirement	CEMP Reference
	Modification approval. The use of the terms short / long term should be considered on a case-by-case basis and be relative to the duration of construction of the SSI.	

This CEMP is the overarching document in the environmental management system for the Project and is supported by the documents attached in the Appendices to address the above requirements of the CoA. They are applicable to all staff and subcontractors associated with the construction of the Project. The relevant 'C' conditions of approval that provide the requirements for sub-plans are included in each Appendix as relevant to each sub-plan.

1.4. Revised Environmental Management Measures

This CEMP and associated documents have been prepared to describe how the Project will meet the construction phase requirements of the REMMs. Table 1-2 identifies REMMS that require the development of Sub-Plans not required by the CoA.

Impact	REMM	Commitment	Document Reference
Mobilisation and spread of contamination in soils	SGC3	Include contamination mitigation measures in an overall Contaminated Soil Management Plan (CSMP) for the construction to describe excavation, validation and disposal requirements for potentially contaminated soils. The CSMP must be prepared by appropriately qualified specialists and form a sub plan to the CEMP and will include the following as a minimum:	Appendix C
		 Method of identification, separation, management and tracking of contaminated soils 	
		 Stockpile any contaminated soil as far away from waterways/drainage lines as possible 	
		 Keep contaminated and non-contaminated soils separate at all times 	
		 Testing of soils to assess suitability if they are to be placed near sensitive receptors 	
Accidental contamination from leaks or spills of fuels / chemicals etc.	SGC9	Prepare an incident emergency spill plan as part of the CEMP to be implemented during construction. Include procedures for the storage and handling of hazardous materials including fuel and chemicals within the CEMP, including:	Appendix I
		 No refuelling to occur on-site unless an appropriate bunded area is available 	
		 Storage of hazardous materials on-site to be kept to a minimum and will be in accordance with national guidelines and the Safety Data Sheets relating to bunding, coverage, storage of incompatible materials, etc. 	
		 Construct the bunded hazardous materials storage area within the desalination plant as early as possible within the construction schedule so that this area could be used for storage of any hazardous materials required during construction 	
Introduction and/or spread of weeds and pathogens	TFB10	Develop a weed species management sub-plan as part of Project CEMP to manage weeds and pathogens during the construction phase of the Project.	Appendix B
Exposure of the subsurface transfer pipeline by coastal	CP4	Monitor weather forecasts when working on the intake infrastructure and halt works when extreme coastal warnings are issued by the Bureau of Meteorology.	Appendix C
processes including beach level fluctuation and storm bite		Prepare and implement a Natural Event Response Plan as part of the Construction Environment Management Plan (CEMP).	
Heavy and Light Vehicle Access Routes	TT10	Development and issue of Heavy Vehicle and Light Vehicle Movement Plans (VMP's) which specifically identifies the Heavy Vehicle and Light Vehicle route to access the project site . These will	Appendix F

Table 1-2: REMM relevant to CEMP Sub-Plans

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Impact	REMM	Commitment	Document Reference
		be referenced and enforced through each subcontract and supplier agreement.	
		Acknowledgement of Heavy Vehicle and Light Vehicle routes as part of project inductions for all staff and workforce attending site.	
		Issue of VMP's and driver code of conduct documents with purchase orders, subcontracts and supply agreements.	
OSOM	TT11	To manage OSOM vehicle movements, a permit will be sought from the NHVR and a separate OSOM Transport Management Plan will be prepared and will include:	Appendix F
		- Identification of route	
		 Measures to provide an escort for the loads 	
		 Times of transporting to minimise impacts on the road network 	
		 Communication strategy and liaising with emergency services and police. 	
Use of Helicopters	TT15	To manage helicopter movements a Helicopter Transportation Plan will be prepared and will include:	Appendix K
		Identification of flight paths between Lake Macquarie Airport and the jack -up barge where over land flight movements will be minimised and located over bodies of water where possible	
		A schedule of operation will be developed where the use of helicopters outside of standard construction hours is minimised where possible	
		A communications plan for interacting with other airport users	
		A schedule of operation will be developed where the dse of helicopters outside of standard construction hours is minimised where possible A communications plan for interacting with other airport users A protocol for interacting with other users of Lake Macquarie Airport including emergency helicopter movements which will be given precedence over helicopter use for the Proposed Modification	

1.5. Environment Management System Overview

1.5.1. Overview of Project EMS

The Project EMS is based on the ISO 14001 accredited John Holland EMS, which itself forms part of the overall John Holland Integrated Management System (IMS), tailored to satisfy Project-specific requirements. It provides a framework to ensure an integrated approach to meeting Project requirements and defines how the Project will minimise impacts to the environment. It comprises a combination of governance documentation, Project-specific management plans (including this CEMP), procedures and tools (refer Figure 03).

The basis for the EMS is the concept of Plan-Do-Check-Act (PDCA), as shown in Figure 1-1.



Plan Clarify objectives Engage Identify risk Evaluate controls Scope and approvals Act Review outcomes and performance Establish improvement actions

- Innovate

Figure 1-1: PDCA model

The PDCA model provides an iterative process to achieve continual improvement. As applied to the Project environmental processes, it can be briefly described as follows:

- Plan: Establish environmental objectives and processes necessary to deliver results in accordance with the John Holland environmental policy.
- Do: Implement the environmental processes as planned.
- Check: Monitor and measure processes against the environmental policy, including its commitments, environmental objectives, and operating criteria, and report the results.
- Act: Take action to continually improve the environmental processes.

The framework introduced in ISO14001 is integrated into a PDCA model within the EMS and in turn this Project CEMP.

In accordance with the Environmental Policy (Appendix A), the Project will:

- Continually improve the EMS to enhance performance, through management review and CEMP revisions
- Maintain third party certification of the overarching EMS to ISO 14001 with independent verification of implementation and effectiveness.

The EMS provides structure to environmental management of the Project and covers areas such as training, record management, inspections, objectives, and policies. This CEMP has been prepared as part of the EMS using JH documentation as the basis for some documents (see Figure 1-2 EMS structure).



Figure 1-2 EMS structure

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1.5.2. Relationship between this CEMP and other EMS Documents

The EMS contains policies, standards, manuals, plans, procedures, processes, and other documents that enable the Project to achieve its objectives through planned and controlled processes. This CEMP sits within a suite of other documents, procedures and processes that form the Project EMS demonstrates the relationship between this CEMP and the CoA, REMMS, Sub-Plans, and other EMS documentation.

Other Project plans that the CEMP interfaces with include the Project Management Plan, Construction Management Plan, Design Management Plan, Quality Management Plan, Safety Management Plan, Sustainability Management Plan, and other environmental management documents (e.g. plans, protocols, strategies, reports, and programs) to ensure the Project CoA and REMMs are implemented demonstrates the relationship between this CEMP and the CoA, REMMS, Sub-Plans, and other EMS documentation.

Other Project plans that the CEMP interfaces with include the Project Management Plan, Construction Management Plan, Design Management Plan, Quality Management Plan, Safety Management Plan, Sustainability Management Plan, and other environmental management documents (e.g. plans, protocols, strategies, reports, and programs) to ensure the Project CoA and REMMs are implemented.



1.6. Infrastructure Sustainability Rating

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The Project Sustainability Management Plan (SMP) provides the framework through which the Project will meet its sustainability targets under Infrastructure Sustainability Council (ISC). The SMP illustrates the extent to which Project plans integrate sustainability into governance, design, procurement, construction, and other functional areas to optimise value for money outcomes over the Project's lifecycle. In accordance with CoA C7, prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Proponent must demonstrate that ESD is being achieved by either:

- a) registering for a minimum rating with the Infrastructure Sustainability Council of Australia's (ISCA) Infrastructure Sustainability (IS) rating scheme and submit evidence of registration to the Planning Secretary; or
- b) (b) seeking approval from the Planning Secretary for an alternative certification process.



2. Endorsement and Approval

2.1. Internal Consultation

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The CEMP and associated Sub-Plans, strategies and monitoring programs undergo ongoing review by the Project Environment Manager, Project senior management and the Project Director. Following the ongoing review and revision process, internal signoff by the Project Environment Manager and the Project Director will be provided.

Section 4.12.2 provide further detail regarding internal review and update of this CEMP and associated Sub-Plans, strategies, and monitoring programs.

2.2. External Consultation

Table 2-1 provides a summary of the relevant authority(s), council(s) and agencies that require consultation during preparation of the CEMP Sub-Plans and monitoring programs in accordance with the CoA.

External distribution for consultation and approval of the CEMP and Sub-Plans will be undertaken by the Project following HWC and ER reviews. The CEMP and sub-plans will be updated in consultation with the relevant external parties and will then be endorsed by the ER in accordance with CoA requirements, confirming that they are consistent with the requirements of the approval documentation. Construction will not commence until the entire CEMP (inclusive of sub plans) has been approved.

After this external consultation and endorsement process is complete, HWC will submit the required document to the Planning Secretary for approval. This will occur no later than one month prior to the proposed commencement of construction.

Plan, Strategy or Document							
	CoA	REMMs	LMCC	DPHI	TfSNW	Registered Aboriginal Parties	LALC
CEMP	C11			Х			
Biodiversity Management Sub Plan	C14			Х			
Groundwater Management Plan	C11.2			Х			
Construction Soil and Water Management Sub Plan	C15	SR7	Х	Х			
Construction Noise and Vibration Management Sub Plan	C19			Х			
Construction Traffic and Pedestrian Management Sub Plan	C18		Х	Х	Х		
Construction Waste Management Sub Plan	C20			Х			
Flood Emergency Response Sub Plan	C16	SR16		Х			
Aboriginal Cultural Heritage Management Plan	C17	SR97		Х		Х	Х
Offshore Construction Works Management Sub Plan	C13			Х	Х		
Helicopter Transportation Plan	N/A	TT15					
Landscape Plan	C21			Х			

Table 2-1: Stakeholder Consultation Table



3. Project Description

3.1. General Features

The approved Project involves the construction and operation of a permanent desalination plant producing up to 30 megalitres per day (ML/d) including direct ocean intake infrastructure; water treatment process plant; brine discharge; electricity supply; and ancillary works.

Key features of the Project include:

3.1.1. Direct Ocean Intake

Consisting of:

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- an onshore pump station:
 - including a central well and concrete structure approximately 11 m to 16 m in diameter, installed to a depth up to about 25 m below existing surface levels.
- intake pipeline:
 - approximately 850 m in length extending perpendicular to the beach in an Easterly direction from the pump station. The pipeline would be up to approximately 2.5m in diameter.
- an offshore intake structure. The intake structure would be:
 - A minimum of 500 m from the existing Belmont WWTW Ocean outfall (Note the Modification design has this placed around 736 metres away) Located outside the surf zone
 - A diameter of up to 14 m
 - At least 4.5 m above the seafloor to minimise potential capture of sediment.

3.1.2. Water Treatment Process Plant

The water treatment process plant would comprise a range of equipment, some of which would be housed in onsite sheds placed above ground level and located to allow incremental installation, if required. Services to and from the process equipment (e.g. power, communications, and raw feed water (ocean water)) would comprise a mix of buried and overhead methods.

The plant will operate at 32.8 ML/d with a 91% availability, equating to a 30 ML/d average flow.

A number of permanent buildings would be required to house the water treatment process plant equipment. The building housing the pre-treatment equipment has the maximum height of all the Project buildings at 14 m, with the exception of the lime tower which has been raised to 15 metres above infilled ground level.

The desalination plant would be connected to Hunter Water's potable water network via a potable water pipeline proposed to be constructed to augment the existing water network.

3.1.3. Brine Disposal System

The desalination process would produce up to 56 ML/d of wastewater, comprising predominantly brine, as well as a small amount of pre-treatment and RO membrane cleaning waste. The waste brine from the desalination process would be transferred via a pipeline to the existing nearby Belmont WWTW for disposal via the existing ocean outfall pipe. During construction, groundwater that is intercepted from the onshore works that cannot be reinjected may also be potentially discharged via the existing ocean outfall pipe.

3.1.4. Power Supply

Provision of the required power supply for the operation of the Project would require connection to Ausgrid's existing 11 kV overhead power network. A new aboveground or underground powerline to the desalination plant site would be provided along Ocean Park Road at the southwest end of the approved Project footprint (refer to Figure 31).



3.1.5. Ancillary Infrastructure

There would be a range of ancillary infrastructure associated with the desalination plant site. Ancillary infrastructure includes but is not limited to the following:

- Stormwater drainage: Stormwater within the water treatment process plant area would be directed into an onsite basin in the north west and a swale on the south west of the Project area.
- **Potable water network:** The Project would connect to the potable water network for administration site shed facilities.
- **Tank Farm:** comprising ocean water (from the intakes), pre-treated ocean water (ocean water that has undergone filtration and pre-treatment), permeate (desalinated water), and potable water.
- **Chemical storage and dosing:** A number of chemicals would be required to be stored for use in the treatment processes. The storage area would have a concrete bunded unloading area.
- **Hardstand:** The water treatment process plant site would generally comprise a hardstand during construction phase (gravel, crushed concrete or similar) with some areas of concrete bunding, and concrete pads for placement of treatment components.
- Fencing, signage and lighting: It is proposed to construct chain wire fencing to the perimeter of the desalination plant site. All construction lighting will be provided in accordance with AS 4282 Control of the obtrusive effects of outdoor lighting, and comply with AS 1158.3.1:2005 Lighting for roads and public spaces Pedestrian area (Category P) lighting Performance and Design requirements.
- Access roads: Access to the desalination plant would be along the existing Ocean Park Road access road to the Belmont WWTW. A new access would be added to enable safe access to the facility. Some areas may also be sealed in high trafficked areas, around the perimeter access road and to the northern intake structure.
- Additional buildings: A fire water system, process tankage, administration building, workshop building, and switch rooms has been included in the building footprint of the latest design.





Figure 3-1 Project Overview

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3.2. Construction Activities and Scheduling

3.2.1. Construction Program

Construction of the Project is planned to commence in early-2025, with a planned completion date scheduled for end of 2027. Project work areas are described in Table 3-1.

The Project's overall delivery strategy has been developed to mitigate program risks and meet Project milestones while considering key environmental aspects and potential impacts requiring mitigation. As such, the overall construction sequence for the Project will incorporate simultaneous construction across sites, with key minor works and site establishment undertaken to assist delivery in a way the minimise environmental risks.

Certain 'Low Impact' works do not fall under the definition of 'Construction' in the CoA (if heritage items, threatened species or threatened ecological communities are avoided) and include:

- building and road dilapidation surveys;
- investigative drilling or investigative excavation;
- Archaeological Salvage;
- establishing temporary site offices (in locations identified by the conditions of this approval);
- installation of environmental impact mitigation measures, fencing, enabling works; and
- · minor adjustments to services or utilities

If any Low Impact Work activities are to continue following approval of the CEMP, remaining works will be undertaken in accordance with the approved CEMP and associated Sub-Plans.

Component	Typical activities	Indicative Duration				
Pre-Construction F	Pre-Construction Phase					
Low impact work and pre-	Property acquisition and adjustments, including property access changes	As required - preconstruction				
construction activities	Detailed investigations and survey work including geotechnical investigative drilling, excavations, archaeological investigations and salvage, and environmental monitoring					
	Road dilapidation and building condition surveys.					
	site enabling work, fencing and signage					
	Installation of environmental controls including temporary or permanent fencing, erosion and sediment control mitigation measures, and habitat connectivity measures					
	Construction of temporary drainage controls					
	Adjustment, relocation and protection of public utilities and services.					
Establishment	Site establishment would generally include the following activities:	Within the timeframe for each aspect				
	Setup environmental mitigation measures, including sediment and erosion controls					
	Mobilisation: Establish construction compounds including laydown and storage areas and spoil areas. Install temporary fencing around construction area and demarcate environmentally sensitive areas, establish all vehicle entry points, access roads and turning bays.					
	It is likely that vegetation clearing for the Project area would occur at commencement of works and may be undertaken by a specialist contractor.					
Construction Phas	e					
Power Upgrades	Connection to Ausgrid's existing 11 kV line located to the southwest of the Project area, with a new power line installed	3 months				

Table 3-1 Construction Program



Component	Typical activities	Indicative Duration
	either above ground or underground along Ocean Park Road. Connection would be via a new substation located within the desalination plant site.	
Direct Ocean Intake	The construction methodology for the intakes work is described in detail below, and would generally comprise the following key aspects:	12-18 months
	Sea Water pump station: installed via secant piling and grout injection technique, as the sandy soils, depth and high groundwater conditions would prevent open excavation	
	Intake pipeline: indicative alignment approximately 850 m in length, extending perpendicular to the beach in an Easterly (E) direction to the off-shore intake structure, completed via the micro-tunnelling / pipe jacking method (micro-TBM) described below	
	Intake structure (offshore): in the form of a vertical structure with a velocity cap structure and low through screen velocity to minimise impacts on marine species and habitat.	
Water Treatment	The construction methodology for the water treatment process plant would generally comprise the following key aspects:	12-24 months
Process Plant	Earthworks and construction of hardstand and associated buildings for operational equipment housing	
	Process pipeline connections	
	Installation of storage tanks, construction of various concrete structures and installation of process equipment	
	Stabilisation and revegetation.	
Commissioning	Testing and commissioning of individual process units and then entire plant. Out-of-specification water to be discharged to WWTW ocean outfall.	1-2 months
Demobilisation	Removal of redundant environmental and safety controls. General site tidy up activities.	Within the time frame of each aspect

3.2.2. Design

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The environment team will work closely with the design team to coordinate appropriate technical inputs from the broader project team and relevant subject matter experts.

The design team will maintain a register of detailed design requirements adapted from the CoA, Project Approval documentation, this CEMP and associated Sub-Plans.

In accordance with CoA A20, the external walls of all buildings including additions to existing buildings must comply with the relevant requirements of the BCA.

In accordance with CoA C4, prior to the commencement of construction, the Proponent must provide the Planning Secretary with documented evidence that the products and systems proposed for use or used in the construction of external walls, including finishes and claddings such as synthetic or aluminium composite panels, comply with the requirements of the BCA.



4. Environmental Management Plan

4.1. Preparation and Availability of the CEMP

This CEMP has been prepared in accordance with CoA A24, requirements of the Environmental Management Plan Guideline - Guideline for Infrastructure Projects (DPIE 2020). It incorporates all requirements of the Project Environmental Assessment documentation and all relevant performance outcomes, commitments, and mitigation measures to be implemented during construction of the Project.

The CEMP is to be displayed on the Project website and at the site office(s) and communicated to staff and other interested parties via inductions and ongoing awareness programs.

Confidential information, which may include the location of threatened species, Aboriginal objects or places and personnel contact details, will be removed from all documents provided or made available to the public.

4.2. Planning

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4.2.1. EIS Environmental Risk Assessment

An environmental risk analysis, including a likelihood and consequence analysis, was carried out in development of the EIS and Modification Report for each environmental issue identified for the project. The environmental risk analysis was undertaken in accordance with the principles of the Australian and New Zealand standard AS/NZS ISO 31000:2018Risk Management – Principles and Guidelines.

The outcomes of the EIS and Modification environmental risk assessments have informed the development of this CEMP and associated Sub-Plans.

4.2.2. Project Risk Assessment Process

4.2.2.1. Risk Management Procedure

The Project's adopted Safety, Quality and Environment (SQE) Risk Assessment procedure involves preparing a series of progressively more in-depth risk assessments and method statements for Project activities including:

- Project Workplace Risk Assessment (WRA): Strategic risk assessment conducted by all Projects to gauge SQE risks and optimise their management by applying the 'hierarchy of controls'. Must be informed by Pre-Tender and Contract Award SQE Reviews. Must engage relevant subject matter experts.
- Activity Method Statement (AMS): A method statement and risk assessment for individual work elements in the WRA, details the specific methodology to be employed, the associated SQE risks and their controls. Must be informed by the WRA, must engage relevant subject matter experts and Client Representative
- Task Risk Assessment (TRA): A method statement and risk assessment for individual tasks in the AMS, details the specific methodology to be employed, the associated SQE risks and their controls. Must be informed by the AMS and be facilitated by supervision with the participation of the workforce. Must be completed prior to work commencing.

Project WRA, AMSs and TRAs are pivotal to the management of all activities during delivery. They allow operational controls to be developed and implemented, case by case, for all the different workplaces, activities and tasks that are encountered in the contracting industry.

Project WRAs, AMSs and TRAs are owned by Project Management, the Construction Manager, supervisory staff such as Forepersons, and the workforce. Project subject matter experts act as advisors during the preparation of these documents ensuring that information from the CEMP and relevant Projects Sub-Plans are suitably incorporated and acted upon. Implementation of the Managing SQE Risk Procedure by the Project team, will allow the actions identified in relation to risks and opportunities, and the achievement of environmental objectives, to be incorporated and used to:

- Establish operating criteria
- Implement control, in accordance with the operating criteria.



The Project risk management process is maintained to AS/NZS ISO 31000:2018 Risk Management – Principals and Guidelines.

Triggers for ongoing analysis of key environmental risks arising from Project activities are described in Section 4.13 of this CEMP.

4.2.3. Regulatory Requirements and compliance

Approvals permits and licenses have and/or will be obtained for the Project, either by HWC or JH. The register will be maintained by the Project Environment 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.

4.2.4. Environmental Objectives

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As a means of assessing environmental performance during construction of the Project, environmental objectives have been established. These objectives have been developed with consideration of key performance outcomes for each key issue, as identified during the environmental risk assessment workshop, and as specified in the Project Approval documents and the REMMs. The objectives are consistent with the Project Environmental Policy and will assist in monitoring whether the commitments of the policy are being met.

The performance of the Project will be monitored against the objectives. Project performance monitoring will be documented in the Project construction monitoring, audit, and inspection reports and at least on an annual basis as part of the management review.

Environmental objectives for the Project are incorporated into relevant environmental management Sub-Plans and a summary is provided in Table 4-1.

Objective	Target	Measurement Tool
Construction of the Project in accordance with environmental approvals	Full compliance with statutory approvals	Audits, construction compliance reporting, incident records, training records, management reviews.
Compliance with all legal requirements	No regulatory infringements (PINs or prosecutions) No formal regulatory warning	Audits, construction compliance reporting, training records, management reviews.
Implement a rigorous and comprehensive EMS that meets the requirements of AS/NZS ISO 14001.	Address non-compliances and corrective actions within specific timeframes.	Audits, management reviews.
Engage with the effected and broader community, minimise complaints and respond to any complaints within a suitable timeframe.	Disseminate regular Project updates and other information through the Project website and other tools identified in the Communication Strategy / Communications Management Plan. Record and respond to complaints within the timeframe specified in the Communication Strategy /	Review complaints register, construction compliance reporting, audits.
	Communications Management Plan.	
Continuously improve environmental performance.	Develop and maintain a program of ongoing environmental training. Capture lessons learnt from environmental incidents to minimise repeat issues. Encourage and reward innovation and	Audits, construction compliance reporting, training records, management reviews.
	effort throughout the works force.	

Table 4-1 Environmental Objectives and Targets



4.2.5. Erosion Sediment Control Plans

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Progressive Erosion and Sediment Control Plans (PESCPs) are planning documents that clearly show the site layout and the approximate location of erosion and sediment control structures onsite. They are produced for construction stages from initial vegetation clearing to rehabilitation when erosion and sediment controls are no longer required and are removed. PESCPs will be developed and implemented prior to commencing activities at all work areas where there is a risk of erosion and sediment loss.

PESCPs may be produced in conjunction with Environmental Control Map(s) to provide more detailed site-specific management measures.

PESCPs will be developed by suitably qualified environment staff in consultation with the Foreperson and other relevant site personnel, as required. All PESCPs are to be prepared in accordance with the Blue Book - Managing Urban Stormwater: Soils and construction - Volume 2D. The Project Environment Manager (or delegate) will approve PESCPs in consultation with the Project ER and Certified Practicing Erosion and Sediment Control (CPESC) specialist in the first instance. Minor changes thereafter will be approved by environment staff in consultation with the Project Environment Manager, as required.

PESCPs will be developed for all work areas prior to commencing activities and maintained for currency throughout the duration of the works, until site stabilisation has been achieved and there is low risk of erosion and sediment loss.

The Soil and Surface Water Management Sub-Plan provides further detail regarding the development of PESCPs as well as the overarching erosion and sediment control strategy developed by the Project CPESC.

4.2.6. Environmental Control Maps

Environmental Control Map(s) (ECMs) provide a simple but effective tool to identify key risk areas, assist in the planning and management of specific areas and promote ongoing communication with construction personnel for the duration of the Project. They consist of a series of plans that clearly show the overarching environmental and socially sensitive areas within and surrounding the Project footprint, including vegetation, heritage, sensitive receivers, waterways, contamination, etc. ECMs will be developed based on sensitive land use, ecological and other environmental data incorporated from publicly available sources, the EIS and / or as supplemented by technical investigations and studies undertaken as required by this CEMP and associated Sub-Plans (e.g. contamination risk).

If any new environmental constraints or sensitive areas are identified during construction, the ECMs will be updated, however they will be document controlled separately to this CEMP or other applicable Sub-Plans. Therefore, an update to the ECMs will not require this CEMP or Sub-Plans to be updated. The ECMs will also be updated if required during scheduled CEMP reviews.

To assist pre-construction planning and on-site construction management, site constraints associated with environmentally sensitive areas are consolidated on the Project's Environmental Portal, a GIS based mapping platform that shows the entire Project area. This functionality will enable Project personnel to access the GIS in real time while in the field, further assisting Project planning and compliance.

ECMs will be prepared pre-construction. Plots of environmentally sensitive areas will be made available on request to field staff as hard copies.

4.2.7. Environmental Procedures

Project EMS procedures, forms and other documents provide instructions and records related to both environmental and non-environmental activities. A list of forms and checklists (subject to change) to be used to monitor environmental performance is provided in Table 4-2.

Specific procedures will be developed in accordance with the requirements for the Project. Where applicable, existing contractor procedures and work instructions will be applied or amended for use on the Project. These procedures are listed within the relevant sections of this CEMP.





Table 4-2 Indicative Forms and Checklists

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Record Type	Notes
Environmental Incident Report Form	Used on an as-needs basis when an environmental incident occurs.
Environmental Site Inspection Checklist	Used during environmental site inspections.
Water discharge permit	Used prior to the transfer of, or discharge of water from sediment retention basins, excavations or holding tanks to the existing ocean outfall at Belmont WWTW
Noise Monitoring Record Sheet	If required, used to record noise levels over a 15-minute monitoring duration for construction activities to ensure they comply with noise criteria.
Monthly Register for Waste Materials	Used monthly to track waste materials used on site including hazardous material (i.e. asbestos).
Equipment Maintenance and Calibration Record Register	Used on an as-needs basis when equipment is maintained or calibrated.
Water Monitoring Record Register	Used after water discharge to record water quality and approvals.
Rainfall Monitoring Record	Used after rainfall events.
Health, Safety and Environmental Report	Used monthly to report on environmental performance.
Environmental Incident Register	Used on an as-needs basis when an environmental incident occurs.
Subcontractor performance review	Used to evaluate the overall performance on each subcontractor, including environmental performance.
Pre- and post-clearing assessment checklist	The pre-clearing records will be used prior to the trimming and/or removal of any vegetation. The post-clearing records will be used to demonstrate compliance with the approval and to inform the need for any further habitat replacement.

4.2.8. Global Mandatory Requirements

The Global Mandatory Requirements (GMRs) outline the control strategies and minimum standards for managing, and where possible, eliminating key risks across the Project. These standards have been developed to:

- Minimise the impact of our activities on the environment and communities.
- Reduce our use of natural resources and energy, and the generation of waste.
- Be a reliable and trustworthy partner to our customers, dedicated to providing environmentally sustainable solutions throughout our diverse business.

The GMR's form part of the Project EMS and are to be used as tools in development of planning documents for management of environmental risks / impacts.

4.2.9. Air Quality Management

Air quality is required to be managed in accordance with Conditions C11(aiii), D19 and D20. JH are required to take all reasonable steps to minimise dust generated during all works authorised by this approval.

During construction, JH will mitigate dust impacts via the following:

- exposed surfaces and stockpiles will be suppressed by regular watering;
- all trucks entering or leaving the site with loads will have their loads covered;
- trucks associated with the development will not track dirt onto the public road network;
- public roads used by these trucks will be kept clean; and
- land stabilisation works will be carried out progressively on site to minimise exposed surfaces.



In accordance with the REMMS for the Project, JH will implement actions per the details provided in Table 4-3:

Table 4-3 Air Quality REMMS

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Air Quality REMM	JH Action
Limit earthmoving activities during periods of high winds	Daily weather reviews will confirm expected winds for the day and if there is potential for impact to nearby sensitive receivers (i.e. extreme onshore winds) then earthmoving activities for the day will be reviewed and if necessary revised to minimise potential impact to these sensitive receivers. If visible dust from construction activities has the potential to impact upon sensitive receivers, works will be revised, additional mitigation measures undertaken or works may be temporarily stopped (if required).
Implement dust suppression using water carts or binder sprays if required	As above
Specify height and cover stockpiles	Where there is a risk of dust generation, long term stockpiles will be covered with geofabric and pinned down to minimise wind blown dust.
	Active temporary stockpiles will be dust suppressed using water carts and sprays on a regular basis
Minimise vehicle movements and limit maximum speed on site to 40 km/h	Details on vehicle speed limits onsite, are specified in the Construction Traffic and Pedestrian Management Sub Plan and will meet this requirement.
Assign haulage routes and minimise vehicle and equipment movements outside of sealed roads/areas.	Details on vehicle routes and vehicle speed limits onsite, on local roads and unsealed roads will be specified in the Construction Traffic and Transport Management Plan and will meet this requirement
Cover loads during transport	Heavy vehicle loads will be covered as required
Limit the areas of clearing and ground disturbance to the minimum required.	JH commit to minimising the area cleared and disturbed as practicable
Investigate any dust complaints and implement correction as soon as possible. Define the complaint procedure within the CEMP.	Complaints will be managed in accordance with Section 4.7.4
Stabilise and revegetate disturbed areas progressively where disturbed areas will be left for longer than 21 days. Revegetate in accordance with the mitigation measures provided in Table 7-7 of the EIS.	JH will stabilise and revegetate disturbed areas progressively where disturbed areas are not required for further construction utilisation. Revegetation will be undertaken as required – refer to the Construction Biodiversity Sub-Plan and Landscape Plan
Maintain dust suppression controls including weave barrier fence as wind breaks on up wind of disturbed areas until rehabilitation is completed with appropriate vegetation coverage.	Dust suppression controls will be maintained until site is considered stabilised.
Turn off plant and machinery when not in use and fit with emission control devices complying with Australian Design Standards.	JH will turn off plant and machinery when not in use and fit with emission control devices complying with Australian Design Standards
Maintain construction plant and equipment in good working condition in accordance with manufacturer requirements. Stand down any equipment found to be emitting excessive exhaust emissions (such as excessive visible diesel smoke) until repaired.	 JH will maintain construction plant and equipment in good working condition in accordance with manufacturer requirements. In accordance with CoA A37 - All plant and equipment used on site, or to monitor the performance of the development must be: maintained in a proper and efficient condition; and operated in a proper and efficient manner.
Prohibit burning of any materials on-site.	No burning of materials or waste will be permitted on site. All hot works will be undertaken in accordance with a JH permitting process
Advise local residents of hours of operation and duration of work and provide a contact name and number for queries regarding air quality.	Communication with the community will be undertaken as required refer to Section 4.7



Air Quality REMM	JH Action
Maintain a clean and tidy site with waste removed frequently, particularly sewage and putrescible waste.	Site will be kept clean and tidy. Any actions from Project Environmental team, ER or HWC inspection or monitoring events will be actioned as required.

4.2.10. Groundwater Management

In accordance with the CoA and REMMs for the Project, JH will implement the management and monitoring actions provided in Appendix I.

4.2.11. Access Management

- Upon JH taking possession of the site for construction to commence, JH will implement management measures to limit and minimise risks to public safety. There are two probable accessways into the project site, these are from the existing paved access road for the Belmont WWTW and from 4WD access from Blacksmiths Beach. Measures to limit access from these locations, including:
- Site access to the JH construction site will be managed via the existing access road for the Belmont WWTW. Access directly to the construction site from the access road will be managed by JH as necessary. Fencing and facilitated heavy and light vehicle access points will be constructed to manage access to the site. This will also include appropriate signage stating construction site and induction requirements and contact details.
- It is proposed to construct ATF temporary fencing to the perimeter of the project site during construction.
- Fencing of the site will include fencing along the eastern limit of the construction works footprint in order to minimise risks associated with public safety access to the site from the dune system.
- Implementation of 'no-go' zones, including flagging for vegetated areas not to be cleared and areas not associated with construction activities (i.e. neighbouring HWC Belmont WWTW site).
- The Belmont WWTW will continue to operate with no change to the movement of the Veolia/HWC heavy and light vehicles.
- All construction lighting will be provided in accordance with AS 4282 Control of the obtrusive effects of outdoor lighting. This will include utilisation of warm lighting and maintaining lighting casting angles to minimise light spill to neighbouring residences.
- Resources, Responsibilities, and Authority

4.2.12. Project Roles and Responsibilities

Environmental management roles and responsibilities for key personnel are described in Table 4-4. The Project organisational chart is provided as Figure 4-1.





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Figure 4-1 Management Structure

Table 4-4 Project Roles, Responsibilities and Authorities

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 Ensure all works comply with relevant regulatory and Project requirements. Ensure the requirements of this CEMP are fully implemented, and, that environmental requirements are not secondary to other construction requirements. Endorse and support the Project Environmental Policy. Liaise with HW, ER and other government authorities as required. Participate and provide guidance in the regular review of this CEMP and supporting documentation. 	1800 168 051
 Ensure the requirements of this CEMP are fully implemented, and, that environmental requirements are not secondary to other construction requirements. Endorse and support the Project Environmental Policy. Liaise with HW, ER and other government authorities as required. Participate and provide guidance in the regular review of this CEMP and supporting documentation. 	
 Endorse and support the Project Environmental Policy. Liaise with HW, ER and other government authorities as required. Participate and provide guidance in the regular review of this CEMP and supporting documentation. 	
 Liaise with HW, ER and other government authorities as required. Participate and provide guidance in the regular review of this CEMP and supporting documentation. 	
• Participate and provide guidance in the regular review of this CEMP and supporting documentation.	
• Provide adequate resources (personnel, financial and technological) to ensure effective development, implementation, and maintenance of this CEMP.	
 Ensure that all personnel receive appropriate induction training, including details of the environmental and community requirements. 	
• Ensure that complaints are investigated to ensure effective resolution.	
• Stop work immediately if an unacceptable impact on the environment is likely to occur.	
• Plan construction work in a manner that avoids or minimises impact to environment.	1800 168 051
• Ensure the requirements of this CEMP are fully implemented.	
 Ensure construction personnel manage construction work in accordance with statutory and approval requirements. 	
• Support the Project Environment Manager in achieving the Project environmental objectives.	
 Ensure environmental management procedures and protection measures are implemented. 	
Ensure all Project personnel attend an induction prior to commencing work.	
Liaise with HW and other government authorities as required.	
• Stop work immediately if an unacceptable impact on the environment is likely to occur.	
Communicate with all personnel and subcontractors regarding compliance with the CEMP and site-specific environmental issues.	N/A
• Ensure all site workers attend an environmental induction prior to the commencement of works.	
Coordinate the implementation of the CEMP.	
Coordinate the implementation and maintenance of pollution control measures.	
 Identify resources required for implementation of the CEMP. 	
 Support the Project Environment Manager in achieving the Project environmental objectives, including on ground implementation of the CEMP 	
 Report any activity that has resulted, or has the potential to result, in an environmental incident immediately to the Project Environment Manager / Environmental Advisor. 	
 Coordinate action in emergency situations and allocate required resources. 	
• Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager and Environment Manager.	
 Ensure that all community consultation activities are carried out. Report and keep record of any environmental issues to the Project Environment Manager raised by stakeholders or members of the 	1800 168 051
	 Including details of the environmental and community requirements. Ensure that complaints are investigated to ensure effective resolution. Stop work immediately if an unacceptable impact on the environment is likely to occur. Plan construction work in a manner that avoids or minimises impact to environment. Ensure the requirements of this CEMP are fully implemented. Ensure construction personnel manage construction work in accordance with statutory and approval requirements. Support the Project Environment Manager in achieving the Project environmental objectives. Ensure environmental management procedures and protection measures are implemented. Ensure all Project personnel attend an induction prior to commencing work. Liaise with HW and other government authorities as required. Stop work immediately if an unacceptable impact on the environment is likely to occur. Communicate with all personnel and subcontractors regarding compliance with the CEMP and site-specific environmental issues. Ensure all site workers attend an environmental induction prior to the commencement of works. Coordinate the implementation of the CEMP. Coordinate the implementation and maintenance of pollution control measures. Identify resources required for implementation of the CEMP. Support the Project Environment Manager in achieving the Project environmental objectives, including on ground implementation of the CEMP. Report any activity that has resulted, or has the potential to result, in an environmental advisor. Coordinate action in emergency situations and allocate required resources. Stop activities where there is an actual or immediate risk of harm to the environment manager / Environment Manager and Environment Manager. Ensure that all community consultation activities are carried out. Report and keep record of any environmental issue

Title	Roles, Responsibilities, and Authorities Relevant to this CEMP	Contact Information
	 Communicate general Project progress, performance and issues to stakeholders including the community. 	
	Maintain the 24-hour complaints hotline.	
Project Environment Manager	Overall responsibility for the implementation of environmental matters on the Project.	1800 168 051
	 Report to Project Director and other senior managers on the performance and implementation of the CEMP. 	
	 Ensure management reviews of the CEMP are undertaken annually, documented and actions implemented. 	
	• Ensure environmental risks of the Project are identified and appropriate mitigation measures implemented.	
	 Identify where environmental measures are not meeting the targets set and where improvement can be achieved. 	
	• Obtain and update all environmental licences, approvals and permits as required.	
	Liaise with ER and approval authorities.	
	 Preparing reports monthly outlining the Project works undertaken and the achievements that have been met, as well as identifying those areas where improvements were made. 	
	Oversee site monitoring, inspections, and audits.	
	 Develop and facilitate induction, toolbox talks and other training programs regarding environmental requirements for all site personnel. 	
	 Notify HWC in the event of an environmental incident or environmental non-conformance and manage corrective action implementation and close-out of these. 	
	• Stop activities where there is an actual or immediate risk of harm to the environment, or to prevent environmental non-conformities, and advise the Project Director, Construction Manager, and Superintendent.	
	• Provide the ER with documentation requested in order for the ER to perform their functions as specified in Section 4.2.14.1, including preparation of the ER monthly report as well as the complaints register and any compliance assessment.	
Wider Project team (including subcontractors)	 Comply with the relevant requirements of the CEMP, or other environmental management guidance as instructed by a member of the Project's management. 	N/A
	Participate in the mandatory Project/site induction program.	
	 Report any environmental incidents to the Foreperson immediately or as soon as practicable if reasonable steps can be adopted to control the incident. 	
	Undertake remedial action as required to ensure environmental controls are maintained in good working order.	
	• Stop activities where there is an actual or immediate risk of harm to the environment and advise the Construction Manager, Superintendent or the Project Environment Manager.	

4.2.13. HWC Roles and Responsibilities

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HWC is the Proponent under the EP&A Act with ultimate responsibility for compliance with the Planning Approval.

The HWC Environment Team will ensure compliance with the Project Planning Approval obligations held by HWC. The key environmental management roles and responsibilities for HWC during the construction phase of the Project are described in Table 4-5.



Table 4-5: Hunter Water Roles, Responsibilities and Authorities

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Title	Roles, Responsibilities, and Authorities Relevant to this CEMP
HWC Senior Project Manager	• Effective interface management for the resolution of complex Project issues and challenges.
	Oversee the environmental aspects of the Project and working closely with Environmental Manager.
HWC Environmental Manager or delegate	 Manage the environmental aspects of the Project and report to HWC Senior Project Manager
	 Review any environmental management plans and related documents prepared for the Project.
	 Review and consider minor Project refinements that are consistent with the Project EIS in accordance with HWC requirements.
	 Monitor the environmental performance of the Project in relation to HWC requirements.
	• Provide guidance and where appropriate, monitor compliance with DPHI post approval document submission requirements.
	 Report relevant information / incidents to other regulatory agencies as required

4.2.14. Regulatory and Other Key Stakeholders

4.2.14.1. Environmental Representative (ER)

The Environmental Representative (ER) is approved by the Planning Secretary and engaged by HWC. The roles and responsibilities of the ER has been described in Table 4-6.

Title	Roles, Responsibilities, and Authorities Relevant to this CEMP
Environmental Representative (ER)	 Fulfil the role, functions, obligations, duties, and services required as outlined in the Planning Approval and Deed of Appointment.
	• Attend meetings and provide reports as necessary at various intervals to the Project.
	 Receive, review, consider, and, if appropriate, make recommendations or request amendments to Project Plans (including updated ones) prepared by the Project.
	• Receive, review, consider, and, where appropriate, provide comments, recommendations, or take suitable action concerning reports, submissions, Approvals, Program, durability assessment reports, Design Documentation, as-constructed documentation, construction completion report(s), pavement report(s), and other information that may be required.
	Access, review, and consider the Project's quality system records as required.
	 Inform the Project of apparent non-conformities that come to the attention of the ER and receive reports, NCRs, and CARs related to non-conformities.
	Where required, attend information sessions, and respond to questions.
	 Receive and respond to communication from the Planning Secretary in relation to the environmental performance of the SSI.
	 Consider and inform the Planning Secretary on matters specified in the terms of the CoA.
	• Consider and recommend to the Project any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community.
	 Review documents identified in in the approval and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so:
	 Make a written statement to this effect before implementation of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or

Title	Roles, Responsibilities, and Authorities Relevant to this CEMP
	 make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary/Department for information or are not required to be submitted to the Planning Secretary/Department);
	 regularly monitor the implementation of the documents identified in this approval to ensure implementation is being carried out in accordance with the document and the terms of this approval;
	 as may be requested by the Planning Secretary, help plan, attend or undertake audits of the development commissioned by the Department including scoping audits, programming audits, briefings, and site visits, but not independent environmental audits required under this approval;
	 as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints;
	• prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an Environmental Representative Monthly Report providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." The Environmental Representative Monthly Report must be submitted within seven calendar days following the end of each month for the duration of the ER's engagement for the development, or as otherwise agreed with the Planning Secretary.

4.2.14.2. Environmental Protection Authority

The NSW Environment Protection Authority (NSW EPA) has powers under a range of legislation and is the agency primarily responsible for administering the Protection of the Environment Operations Act 1997 (POEO Act). The Waste Water Treatment Plant has an existing EPL (1771), which has been amended to accept the groundwater discharge from the construction of the desalination project. As part of the HWC EPL, the Project is required to:

- Notify HWC who will notify the EPA in the event of an incident in accordance with relevant legislation and this CEMP.
- Report to HWC for reporting to the EPA as required by the EPL.
- Provide access to the site as reasonably required.

4.2.14.3. Specialist Consultants

Specialist environmental consultants will support the Project to provide expert advice and assistance in developing and delivering the CEMP and Sub-Plans. The Project will seek expert advice from additional specialist consultants during the delivery of the works as required by the CoA. Specialist consultant roles are described within Sub-Plans. Onsite roles and responsibilities for environmental monitoring and reporting are further discussed in Section 4.2.12.

4.3. Selection and Management of Subcontractors

The Project Environment Manager, or delegate, will participate in the tender assessment and selection process for the Project subcontractors as necessary based on the associated environmental risks. All subcontractors will be required to complete a subcontractor questionnaire or similar.

Environmental requirements and responsibilities are to be specified to subcontractors in the contract documentation. As part of the selection process, consideration will also be given to their past environmental performance.

All subcontractors are required to work in accordance with the approved CEMP. This includes participation in:

- Project and/or site inductions, where the requirements and obligations of the CEMP are communicated and toolbox talks. A record of all subcontractors inducted will be maintained as part of the Project induction and training register.
- Carrying out observations, inspections, audits, and incident investigations (as required).



• Planning, implementing, and monitoring environmental protection measures and keeping environmental records.

All environmental documentation submitted by subcontractors will be subject to review and approval (if required) by the Project staff to ensure compliance with the CoA, before works may begin.

If subcontractors are using or are permitted to use their own environmental management system, the subcontractor must demonstrate that their EMS is certified to ISO14001 and implemented to meet the Project's minimum environmental requirements. A standard form will be developed that will be used to assess:

- The subcontractor's general work practices.
- The effectiveness of the subcontractor's environmental protection measures.
- The subcontractor's compliance with the requirements of this CEMP.
- The maintenance of environmental measures.

In accordance with CoA C11(vi)(viii), marine vessels will be preferentially sourced from locally sourced contractors. Refer to subcontractor management process described in Section 4.4.

4.4. Subcontractor Management

Subcontractor environmental requirements and responsibilities are to be specified in the contract documentation. All subcontractors are required to work in accordance with the approved CEMP.

All subcontractors will operate under John Holland's IMS. To ensure compliance with the minimum requirements of the IMS, subcontractors will be treated as if they were the Project employees, that is, all parts of the IMS apply to their operations. To ensure compliance and detect any non-conformance, subcontractors will be subject to:

- Environmental inspections of their work areas with key subcontractor representatives and Forepersons
- Environmental audits undertaken by the Project Environment and Sustainability Manager.

John Holland operates under the Health, Safety and Environment (HSE) Behavioural Framework detailed in Section 4.5.1, which provides guidance when engaging with site personnel. The framework forms part of subcontractor induction and management and covers the expected behaviours around environmental management for all workers, supervisory staff and managers.

Examples of poor performance and behaviour include the ongoing failure to close out actions following Environmental Inspections, absent controls in the work area (such as Erosion and Sediment controls) or noncompliance with approval issues such as working hours and/or plant/equipment parked under drip lines of trees or outside the boundary. To manage poor performance and behaviour several mechanisms are available for use when a subcontractor continually fails to meet their contractual obligation such as:

- Provide the ongoing support and guidance to teams in the field through the Environmental team.
- Re-induct individuals/teams where required and provide specific training, such as Erosion and Sediment Control.
- Involvement of senior management from the Project and Subcontractor to discuss poor performance at a higher level.
- Disciplinary action if required.

Subcontractor performance will also be managed using the John Holland Accountable Culture Tool (ACT). Poor performance will be managed with the tools provided in the John Holland ACT by the Environment and Sustainability Manager and Project Director.

4.5. Competence, Training and Awareness

In accordance with CoA D23, JH will prepare and implement awareness training for employees and contractors, including locations of the assembly points and evacuation routes for the duration of construction.

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 Project Environment Manager, or their delegate, will coordinate the environmental training, which may be presented in conjunction with other training and development activities (e.g. safety).

4.5.1. Health, Safety and Environment Behavioural Framework

Presented as four core themes, 'Standards', 'Communication', 'Risk management' and 'Involvement', the HSE behaviours describe a set of everyday behaviours that are expected of all workers to drive better HSE outcomes. These themes are the key elements of a culture that displays strong HSE performance. The HSE Behavioural Framework integrates onsite planning and management of environmental aspects with approaches to health and safety. This extends to the way the Project manages subcontractors, carries out regular inspections, deals with incidents and identifies lessons learned and improvement opportunities.

The HSE Behaviours are a set of behaviours that, if displayed consistently, will support strong safety and environment performance at a workplace. The HSE Behaviours are outlined in a simple framework in Figure 4-2.



Figure 4-2: HSE Behavioural Framework

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Represented in the framework above are twelve cells that identify HSE behaviour expectations set out across three employee groups noted as Everyone, Supervisors and Managers, and the four themes. Each cell is interdependent of each other and is supported by a set of behaviours that are expected of people and a set of behaviours that are considered undesirable.

As part of the CEMP, the HSE behaviours will be integrated within:

- Inductions and Training to communicate the expected HSE Behaviours to staff, subcontractors and workforce.
- Toolbox and Pre-Starts to communicate expected HSE Behaviours to workplace members as they
 relate to a specific task or change in hazards/risks.
- Audits and reviews to identify a workplace's strengths.

In addition, this Project will have an HSE Behavioural Plan that will provide the framework for incorporating the desired behaviours though all levels of Project delivery.

4.5.2. Environmental Induction

All personnel (including subcontractors) 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 REMMs.

Short-term visitors to site undertaking inspections/entering the site (such as regulators) will be required to undertake a visitor's induction and be always accompanied by inducted personnel.

Temporary visitors to site for purposes such as deliveries will be required to be always accompanied by inducted personnel. The Project Environment Manager (or delegate) will conduct the environmental component of the site inductions.

The environmental component of the induction must cover the applicable elements of the CEMP and will include:

- Relevant details of the CEMP including purpose and objectives.
- Requirements of due diligence and duty of care.
- Key conditions of licences, permits and approvals.
- Incident response on site and the emergency response procedures.
- Reporting and notification requirements for pollution, non-compliance, and other environmental incidents.
- Environmentally high-risk activities and associated environmental safeguards, or where these safeguards are to implemented, for example;
 - Working in or near environmentally sensitive areas.
 - Aboriginal and non-Aboriginal heritage management requirements.
 - Flood response
 - Traffic and pedestrian management
- Specific environmental management requirements and responsibilities.
- Information relating to the location of environmental constraints.

The induction will also include information about the surrounding community, the key stakeholders, and any location specific sensitivities. The induction will provide information on what to do if approached by a member of the public or media, and an outline of Project personnel and subcontractor responsibilities and obligations relating to the community.

An induction register will be maintained as a record of all environment inductions and kept on-site.

The Project Environment 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, in response to incidents to include lessons learnt or related documentation.

4.5.3. Toolbox Talks

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all aspects of construction including environmental issues and in response to environmental events (i.e. incidents and / or nonconformances). The toolbox talks are used to ensure environmental awareness continues throughout construction.

Toolbox talks will also be tailored to specific environmental issues relevant to upcoming for relevant personnel

Toolbox talk attendance is mandatory and attendees of toolbox talks are required to sign an attendance form and the records maintained.

Potential environmental toolbox talks are shown in Table 4-7.

Table 4-7: Examples of Typical Environmental Toolbox Talks

Aspect	Training Inclusion	Personnel Required	Timing / Frequency / Means	
Emergency Spill	Use/location of spill kits.	Construction Personnel	Project Toolbox Talks	
Response	Spill control.			
	Emergency response procedures.			
	Identify hydraulic hose fatigue.			
Incident Management	Incident Management and Reporting Procedure.	Construction Personnel	Project induction and	
and Reporting	Emergency response procedures and reporting requirements.		Toolbox Talks	
Noise and Vibration	The management of noise and vibration impacts.	Construction Personnel	Project Toolbox Talks	
Management	Out-of-Hours Work Protocols.		Prior to the	
	High noise generating activities.		activities with the	
	Respite periods.		potential for high noise	
CONSTRUCTION ENVIRON	/ ENTAL MANAGEMENT PLAN CS1135-WT-BEL-EN-PLN-0001	REV: 2 19/11/2024		
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Aspect	Training Inclusion	Personnel Required	Timing / Frequency / Means	
			impacts on sensitive receivers	
Heritage Management	The management of heritage impacts. Unexpected finds procedure for suspected heritage items.	Construction Personnel	Project Induction and Toolbox Talks	
Flora and Fauna Management	The management of flora and fauna impacts. Unexpected threatened species finds procedure. No-go Zones. Vegetation clearing procedure.	Construction Personnel	Project Toolbox Talks	
Soil and Water Management	Erosion and sediment controls. ASS management. Unexpected, contaminated land and asbestos finds procedure. Construction site water reuse and dewatering procedure.	Construction Personnel	Project Toolbox Talks	
Waste Management	The management of waste. Waste recording and reporting. Waste classification. Stockpile management.	Construction Personnel	Project Toolbox Talks	
Spoil Management	The management of spoil. Spoil recording and reporting. Spoil classification. Stockpile management.	Construction Personnel	Project Toolbox Talks	
Visual Amenity Management	The management of visual amenity impacts. Light spill management. Stockpile management.	Construction Personnel	Project Toolbox Talks	
Flooding	Triggers for flood management requirements Management of fuels and chemical storage Stockpile management	Construction Personnel	Project Toolbox Talks	
Community Interaction	Community complaints management Community Communication Strategy	Construction Personnel	Project Induction and Toolbox Talks for specified activities	

4.5.4. Training and Awareness

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Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. Topics covered may include those detailed in Table 4-7, or others deemed necessary in the lead up to or during construction.

For each key environmental risk, relevant training requirements have been identified. An indicative training matrix (refer Table 4-8) has been prepared listing all roles that hold environmental responsibility as detailed in this CEMP, against training requirements based on the environmental aspect that train role would encounter as part of its activities on this Project. The matrix specifies the minimum training requirements for each role, it outlines all training courses or events and the frequency of that training. This matrix will be managed and updated throughout the Project to capture new training requirements, in a process to be managed outside the scope of this CEMP.



Table 4-8: Indicative Training Needs Analysis

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Training Topic / Course	Personnel												
	Project Director	General Superintendent	Construction Manager	Safety	Engineers	Environmental	Sustainability	Community Stakeholder & Engagement	Foreperson	Leading Hands	Labourers	Subcontractors	Administration
Project induction	х	х	х	х	х	х	х	х	х	х	Х	х	х
Project approvals, licences, obligations, and requirements	х	х	х	х	х	х	х	x	х				
Out of Hours Works approvals and permit processes and requirements	х	x	x	x	x	x	x	X	x	x		x	
Dewatering of excavations			х			х	Х		х	Х	Х	х	
Environmental incident identification, response, and management	х	x	x	x	x	x	x	X	x	x	x	x	х
Noise and vibration						х	х	х	х				
Water discharge monitoring and response			x			x	x		x	х			
Flood response	х	х	х	х		х			х	Х	Х	х	
Practical erosion and sediment control for the workforce			х			х	х		х	х	х	х	
Environmental sampling techniques						x				х			
Unexpected finds procedure and asbestos awareness	х	x	x	х	x	x	x	x	x	x	х	х	х
ICAM or similar incident investigation training		x		х		x							
ISAP – Infrastructure Sustainability Assessment Practitioner							x						
Complaints and Inquiries Management	х	x	x	х	x	x	x	x	x	x	x	x	

4.5.5. Daily Pre-Start Meetings

The pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

The Foreperson will conduct a daily pre-start meeting with the site workforce before the commencement of work each day (or shift) or where changes occur during a shift. The daily prestart is encouraged to be an interactive meeting, providing the workforce with an opportunity to provide comment on the management of site activities.

The environmental component of pre-starts will be determined by the Foreperson and environmental personnel and will include any environmental issues that could potentially be impacted by, or impact on, the day's activities. All attendees will be required to sign on to the prestart and acknowledge their understanding of the issues explained. Pre-start topics, dates delivered, and a register of attendees will be recorded.



4.6. Working hours

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The Noise and Vibration Management Sub-Plan and associated Out of Hours Work Protocol provides key details of Project working hours and the assessment and approval process for variation of working hours as authorised under the CoA or otherwise permitted under the EPL. The following provides a summary of key requirements per the CoA.

4.6.1. Approved Standard Construction Hours (D3)

In accordance with CoA D3, the approved construction working hours for the Project are:

- 7:00am to 6:00pm Mondays to Fridays, inclusive
- 8:00am to 1:00pm Saturdays
- At no time on Sundays or public holidays.

4.6.2. Variation to Construction Hours and Emergency Hours

In accordance with CoA D4, notwithstanding Conditions CoA D3 and D7, construction may be undertaken outside the hours specified in in CoA D3 under the following circumstances:

- (a) Safety and Emergencies, including:
 - for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or
 - where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm.
- (b) Construction that meets specific criteria per Condition D3 (further discussed in the NVMP).
- (c) By Approval, including:
 - where different hours are permitted or required under an EPL in force in respect of the SSI; or
 - Construction which is not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition C29; or
 - negotiated agreement with the substantial majority of affected residents and sensitive receivers for Construction which is not subject to an EPL.
- (d) By Activity, including:
 - MicroTBM activities at site can occur 24 hours a day, seven days a week. This does not permit
 material deliveries associated with MicroTBM activities.
 - Helicopter movements in accordance with CoA D41 and D42.
 - Offshore works at the jack-up barge from 5:00am to 8:00pm seven days per week.

Although certain activities identified in Condition D4(d) are permitted to occur outside the construction hours defined in Condition D3, these activities still need to be managed in accordance within the environmental management framework established within this approval.

4.6.3. Highly Noise Intensive Works

Except as permitted by an EPL, in accordance with CoA D7, highly noise intensive works that result in an exceedance of the noise affected NML (RBL + 10 dB as defined in the ICNG) at the same receiver must only be undertaken:

- (a) between the hours of 8:00 am to 6:00 pm Monday to Friday;
- (b) between the hours of 8:00 am to 1:00 pm Saturday; and

(c) if continuously (any period during which there is less than one hour between ceasing and recommencing any highly noise intensive work), then not exceeding three (3) hours), with a minimum cessation of highly noise intensive work of not less than one hour.

Work should be carried out in continuous blocks that do not exceed three hours each with a minimum respite period of one hour between each block.



4.7. Communication

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4.7.1. Internal Communication

Clear lines of communication within the Project is key to minimising environmental impacts and achieving continual improvements in environmental performance. This includes communication within the Project Environment team and wider Project team.

The environmental team will meet regularly to discuss any issues with environmental management on-site, any amendments to plans that might be required or any new/changes to construction activities.

Regular meetings may also be scheduled with the ER and relevant HWC personnel. The purpose of these meetings will be to communicate ongoing environmental performance and to identify any issues to be addressed.

In addition, environment team members will participate in regular toolbox talks and training and will provide input into daily pre-starts, when required. This will provide an opportunity for the environment team members to communicate on environmental performance, to advise on any upcoming sensitive environmental matters for future work areas, receive feedback from on-site personnel and generally raise awareness on environmental matters. This process is further described in Section 4.5.3.

Internal communication hierarchies will be developed and distributed to the Project Environment team, and updated if any changes occur, such as new staff members joining the team. The communication hierarchy will provide details of who to contact in the event of any environmental problems and/or pollution events and will include contact details of each team member.

4.7.2. Liaison with EPA, Government Authorities, or other Relevant Stakeholders

The Project Environment Manager (or delegate) has the responsibility to report on the ongoing environmental performance of the Project to HWC and the ER. HWC maintains responsibility for liaison with the EPA, and other regulatory agencies. The Project Environment Manager (or delegate) will report regularly to HWC on progress and any key environmental matters, as required.

The Project Construction Manager and the Project Environment Manager (or delegate) are 24-hour contacts. They have the authority to halt the progress of the works if necessary. They are the key emergency response personnel during an environmental site emergency.

The Project Environment Manager (or delegate) is the authorised contact person for communications with HWC on environmental matters.

4.7.3. Community Liaison and/or Notification

A Community Communication Strategy (CCS) has been developed that meets the conditions of the CoA. In conjunction with the CCS, the Project has developed a Construction Community Liaison and Communications Plan (CCLCP) which details the specific management of communications to be undertaken for the Project.

For activities that have the potential to significantly impact the community or provide risk to the Project or HWC, the Project will develop specific communication plans and packages to support delivery and clearly identify and mitigate issues and risks.

A range of communications activities and tools will be used to inform and engage the community and stakeholders about the Project. These are documented in the Communication Strategy.

The community engagement team will aim to notify all noise and/or vibration affected sensitive receivers of the likely impact and duration of works, including emergency works, if required in accordance with the CoA, REMM or EPL.

All work must be coordinated to ensure respite periods are provided. High noise generating activities may only be carried out in continuous blocks, not exceeding three hours each, with a minimum respite period of one hour between each block.



High noise refers to construction noise impacts which exceed the highly affected noise management level of 75 dB(A) LAeq(15min) during standard construction hours.

Respite periods for OOHW will be provided in consultation with the affected community on a regular basis and will include (but not be limited to) providing the community with:

• A progressive schedule for OOHW

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- · A description of the potential work, location, and duration of the OOHW
- Noise characteristics and likely noise levels of the work
- Likely mitigation and management measures to be implemented with the aim of achieving the relevant Noise Management Levels (NMLs) and vibration criteria (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers).

Respite may include the following where the above cannot be achieved:

- Rescheduling work to provide respite to impacted noise sensitive land use(s)
- Provision of alternative respite or mitigation to impacted noise sensitive land use(s).

Records of respite and consultation with the affected community will be maintained and provided to the ER as required.

Project contact cards will be issued to construction personnel to be used in the event a member of the public or media approaches them on-site. As discussed in Section 4.5.4, Project staff will attend Project-specific community awareness training to ensure they respond to the community in a sensitive and appropriate manner if approached.

4.7.4. Complaints Management

JH will maintain a Complaints Register for the Project within a project specific application known as 'Consultation Manager', in accordance with the requirements of CoA B6. A copy of the register will be able to be exported from CM for provision to DPHI, where required.

HWC has established a Project email (desal@hunterwater.com.au), postal address (PO Box 5171, Hunter Region Mail Centre, NSW 2310), and free-call number for Project enquiries and complaints (1800 968 051). Complaints from other agencies will also be monitored via this phone number. the phone number will be available 24/7. All contact will be acknowledged, and responses provided in accordance with the timeframes outlined in the approved CCS.

The telephone number will be available for the duration of the work and from 12 months following completion of construction. All approaches from the community and stakeholders will be registered in the Project's Consultation Manager Stakeholder database managed by the Project community team.

The telephone number, postal and email address will be published on all the Project collateral (including the website), site signage and hoarding, and social media.

Records of all complaints received will include the following details as minimum (refer to CMP for full requirements):

- Date and time of the complaint.
- Method by which the complaint was made.
- Personal details of the complainant provided by the complainant or, if no such details were provided, a note to that effect.
- Number of people in the household affected in relation to the complaint
- The nature of the complaint
- Means by which the complaint was addressed and whether resolution was reached, with or without mediation.
- If no action taken, reasons why.

JH will circulate an updated copy of the complaints register by 2:00pm the day that the complaint has been received or within 24 hours, should a complaint be made outside working hours. The complaints register will be provided to HWC, and the ER. Note that complainants will be advised that the Complaints Register may be forwarded to Government agencies to undertake their regulatory duties.



This information will be included in a Complaints Register, in accordance with CoA B6. The information contained within the register will be made available to the Planning Secretary upon request.

An initial response to complaints will be provided in accordance with the Project Community Communication Strategy defined complaint response times, generally as follows:

- Complaint received by call, text, or personal contact:
 - Within 2 hours during standard construction hours and during out-of-work when construction is occurring.
 - Otherwise, within 24 hours.
- Written complaint:

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- Acknowledged within 8 hrs.
- Proposed action within 24 hrs (verbal or written where no phone number has been provided).
- Detailed written response within 10 business days.

All complaints will be closed off in the stakeholder database. At all times the stakeholder will be kept informed of when they will receive a response.

The Project Environment Manager (or delegate) will apply an adaptive approach to ensure that corrective actions are applied in consultation with the appropriate construction staff to allow modifications and improvements in the management of any environmental issues resulting in community complaints.

Where requested by the Planning Secretary, the ER will assist in the resolution of community complaints. Further details of the mediation process to be undertaken for unresolved complaints is included in Community Communications Strategy.

4.8. Incidents and Emergencies

4.8.1. Project and Incident Classification, Notification, and Reporting

In the event of an environmental incident, the Project will implement classification, notification, and reporting requirements in accordance with JHs Project Environmental Incident Procedure.

The Project Environment Manager (or delegate) will be responsible for investigating, tracking, communicating, and closing out non-conformances, and implementing corrective and preventative actions. Higher level incidents will require the Project Director to review and close out. The HWC Environmental Manager, and JH Environmental Team, and the ER, will provide supporting functions as required and agreed within, Table 4-6.

In the event of an incident, the Project will undertake notification requirements as detailed in Table 4-9.

Table 4-9: Incident Notification

Repo	ort only	Notifiable			
•	Verbally notify HWC of incidents immediately, followed by written notification to HWC and the ER within 24 hours of the incident	•	Verbally notify HWC of incidents immediately, followed by written notification to HWC and the ER within 24 hours of the incident.		
•	If required, HWC will notify the EPA and relevant authorities immediately	•	HWC to notify the EPA and relevant authorities immediately. Follow Belmont WWTW PIRMP		
		•	Prepare an incident notification / non-compliance report and submit to HWC and the ER within 48 hours.		
		•	Prepare an investigation report and submit to HWC and the ER within 7 days.		

Environmental incident reports will include lessons learnt and proposed measures to prevent the occurrence of a similar incident. All efforts will be undertaken immediately to avoid and reduce impacts of incidents and suitable controls put in place. Incidents will be closed out as quickly as possible, taking all required action to resolve each environmental incident.



4.8.2. Notification and Reporting to the Planning Secretary

In accordance with CoA A26, the Planning Secretary will be notified via the Major Projects Website immediately after the Proponent becomes aware of an incident. The notification must identify the SSI and set out the location and nature of the incident.

Subsequent written notification will be provided to the Planning Secretary in accordance with CoA A27 as follows:

- A written incident notification addressing the requirements set out below must be submitted to the Department via the Major Projects website within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under Condition A26 or, having given such notification, subsequently forms the view that an incident has not occurred.
- Written notification of an incident must:
 - Identify the development and application number.
 - Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident).
 - Identify how the incident was detected.
 - Identify when the Proponent became aware of the incident.
 - Identify any actual or potential non-compliance with conditions of approval.
 - Describe what immediate steps were taken in relation to the incident.
 - Identify further action that will be taken in relation to the incident.
 - Identify a Project contact for further communication regarding the incident.
- Within 30 days of the date on which the incident occurred, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.
- The Incident Report must include:
 - A summary of the incident.
 - Outcomes of an incident investigation, including identification of the cause of the incident.
 - Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence.
 - Details of any communication with other stakeholders regarding the incident.

For clarity, the State Infrastructure Approval instrument provides the following definitions for incident and material harm:

An 'Incident', as defined in the State Infrastructure Approval instrument, is:

An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance.

"Material Harm" as defined in the State Infrastructure Approval instrument:

is harm that:

....

(a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or

(b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).

The Project will maintain and provide all records of the environmental incidents and regulatory action to the HWC Project team.



4.8.3. Notification and Reporting to the EPA

HWC will notify the EPA of any pollution incidents on or around the site via the EPA Environment Line (telephone 131 555) in accordance with Part 5.7 of the POEO Act. The circumstances where this will take place include:

- Where the incident involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- Where the incident results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (or such other amount as is prescribed by the regulations).

HWC will prepare a revised Pollution Incident Response Management Plan (PIRMP) prior to construction in accordance with EPL requirements, this plan will include all reporting requirements.

4.8.4. Emergency Response

The Project team will:

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- Prepare to respond by planning actions to prevent or mitigate adverse environmental impacts from emergency situations.
- · Respond to actual emergency situations.
- Take action to prevent or mitigate the consequences of emergency situations, appropriate to the magnitude of the emergency and the potential environmental impact.
- Periodically test the planned response actions, where practicable.
- Periodically review and revise the process and planned response actions, after the occurrence of emergency situations or tests.
- Provide relevant information and training related to emergency preparedness and response, as appropriate, to relevant interested parties, including persons working under its control.

The Project team shall maintain documented information to the extent necessary to have confidence that the process is carried out as planned. The Project will provide all records of the environmental emergencies and regulatory action to HWC. All necessary contact numbers will be identified in advance and stored for immediate access should a pollution incident need to be notified. These contact numbers will also be identified in the PIRMP.

Emergency planning and awareness training will be undertaken for the Project and will include but not be limited to development of a communication protocol, both internal and external, during emergencies, identified potential environmental emergencies that may occur on the Project, and the response procedures for these emergencies and tests of the emergency response procedures.

4.8.5. Incident Investigation

Where required, due to the severity or ongoing nature of the incident, investigations will be conducted and action plans established to ensure that the event does not occur again. Environmental investigations will include:

- Identification of the cause, extent, and responsibility of the incident.
- Identification and implementation of the necessary corrective action.
- Identification of the personnel responsible for carrying out the corrective action.
- Implementation or modification of controls necessary to avoid a repeat occurrence of the incident.
- Recording of any changes in written procedures required.
- Advising the relevant government agencies if any substantial pollution has occurred.

Information will be captured in site databases. Where there are lessons learnt from the investigation or current procedures are identified as being ineffective, the CEMP will be revised by the Project Environment Manager to include the improved procedures or requirement.

4.9. Monitoring, Inspections and Auditing

Key characteristics of the Project activities which have an impact on the environment will be regularly monitored and measured. This may include issue-specific environmental monitoring, recording of information to track performance, monitoring controls, and level of compliance with objectives and targets.



Regular compliance activities, such as inspections, observations and monitoring will be undertaken throughout construction of the Project. Subcontractor works will be included in inspections, observations, monitoring, and audits as appropriate.

4.9.1. Environmental Inspections

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Regular monitoring and inspections will be undertaken during and following construction until otherwise approved. Monitoring and inspections form a fundamental aspect of ongoing Project risk analysis and will include, but not be limited to those outlined in Table 4-10.

Where aspect specific inspections are required (e.g. post rainfall inspections) these will be covered in the specific Sub-Plans.

All environmental inspection reports are to be closed out in the agreed timeframes, actions are to be recorded in an action register. Copies of all reports are to be kept by the Project alongside the Project records.

If any maintenance and/or deficiencies in environmental controls or in the standard of environmental performance are observed, they will be recorded on the checklist form. Records will also include details of any maintenance required, the nature of the deficiency, any actions required and an implementation priority. Actions will be closed out in accordance with the identified priority and evidence of close out would be kept on file.

Item	Frequency	Standards	Reporting	Responsibility
Environmental site inspection	Weekly	Weekly Environmental Inspection Checklist	Closed out Weekly Environmental Inspection Checklist	Project Environment Team
ER site inspection	Fortnightly or as determined based on risk level	Environmental Representative Protocol (October 2018)	ER Inspection Report ER Monthly Report	ER
HWC Inspections	Fortnightly or as determined based on risk level		Environmental Inspection checklist / notes	HWC Environment Team
CPESC specialist	Monthly and post rainfall events	Managing Urban Stormwater (the Blue Book) guidelines	PESCP review and update	Project Environment Team / CPESC
Plant / equipment inspections	Regularly or in accordance with manufacturer's specifications	POEO Act	Plant and vehicle inspection logs	Mechanical Supervisor and Operators
Visual surveillance	Daily during activities with high environmental risk	Project EMS	Foreperson's Logbook / Site Diary	Foreperson
Shutdown Environmental inspections	Prior to site shut down (i.e. Christmas period)	Project EMS	Inspection Checklist	Project Environment Team
Post Shutdown Environmental inspections	post site shut down (i.e. Christmas period)	Project EMS	Inspection Checklist	Project Environment Team

Table 4-10: Environmental Inspection Requirements

4.9.2. ER and HWC Inspections

The Environment Manager (or authorised delegate) will participate in all ER and HWC inspections, and records will be maintained. Deficiencies and required actions will be analysed and prioritised at the completion of the inspection and timeframes for implementation of corrective actions agreed.

The ER and HWC representatives will undertake regular inspections of works sites, and in particular critical activities throughout construction of the Project. Inspections by the ER and HWC representatives will be



undertaken as determined by the ER and HWC, depending on the complexity and anticipated risks associated with the stage of construction.

4.9.3. External Stakeholder and Government Agency Site Inspections

Throughout the design and construction, the Project will facilitate regular inspections/site visits from external stakeholders and government agencies. The Project will be represented by members of both the environmental management team and the construction team during these inspections/site visits.

4.9.4. Daily Surveillance

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Daily inspection will be carried out during Project activities that have a high inherent environmental risk, such as dewatering or work over water.

Daily surveillance will include a check of relevant environmental controls and resources required to ensure effective operation and maintenance. If deficiencies are noted, they can be rectified immediately. The Foreperson will undertake the inspections and note any deficiencies or repairs in the Foreperson's Logbook/Site Diary.

4.9.5. Environmental Monitoring

Monitoring will be undertaken to validate the impacts predicted for the Project, to measure the effectiveness of environmental controls and implementation of this CEMP, and to address approval requirements. It is noted that each Sub-Plan that forms part of the Project EMS includes monitoring requirements consummate to the potential environmental impacts and risks and addresses the requirements of the CoA, REMMs and Environmental Approval documentation.

Monitoring will be undertaken in accordance with relevant guidelines, or in accordance with the detail provided in the aspect-specific monitoring program or plan.

The ER and HWC Environment Manager will be advised of any construction phase non-conformance from monitoring and details reported.

Where a non-conformance is detected or monitoring results are outside of the expected range and are directly attributable to the Project (i.e., are influenced by factors under the direct control of the Project e.g., noise from construction equipment), the process described below is to be followed. Steps in the process will typically include:

- An analysis of the results by the Project Environment Manager in more detail with a view of determining possible causes for the non-compliance
- A site inspection by the Project Environment Manager or delegate
- Advising relevant personnel of the problem
- Identifying and agreeing on actions to resolve or mitigate the non-conformance.
- Implementing actions to rectify or mitigate the non-conformance.

A non-conformance report may be issued by the Project Environment Manager if it is found to be construction related, in accordance with Section 4.10. The nature of the non-conformance also needs to be assessed against the criteria detailed in the Project Incident Classification, Notification and Reporting requirements (refer Section 4.8.5).

The timing for any improvement will be agreed between the relevant Foreperson and the Project Environment Manager based on the level of risk (e.g. a significant risk will require immediate action).

All environmental monitoring equipment shall be maintained and calibrated according to manufacturer's specifications and appropriate records kept.

4.9.6. Auditing

4.9.6.1. Independent Audits

- In accordance with CoA D35 D40, independent auditors are to be appointed and approved by DPHI. Independent audits will be carried out in accordance with frequency prescribed in the Independent Audit Post Approval Requirements (DPHI, 2020). The minimum timeframes for undertaking independent audits are:
- Within 12 weeks of the commencement of construction

• At intervals, no greater than 26 weeks from the date of the initial Independent Audit or as otherwise agreed by the Planning Secretary.

DPHI may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice (or timing as stipulated by the DPHI) of the date upon which the audit must be commenced.

Where requested by the Planning Secretary, the ER may help plan or attend audits including scoping, programming, briefings, and site visits, except for independent audits required under CoA D36.

Auditing will also be undertaken by an environment auditor independent to the Project in accordance with ISO 19011:2014 - Guidelines for Quality and/ or Environmental Management Systems Auditing. Note that audit findings may result in the CEMP and Sub-plans requiring updates. As per CoA D36, Independent Audits must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPHI, 2020).

4.9.6.2. Compliance Reporting

In accordance with CoA A33-A36, compliance reporting is required to be completed by HWC for the project. JH will assist HWC in providing relevant information as requested, in order for HWC to complete reporting as required.

Compliance reports must be submitted to the DPHI in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements, unless otherwise agreed by DPHI.

4.9.7. Reporting

Prior to, during and following construction, various reports will be prepared to fulfil HWC and other reporting needs, and requirements under Project Approval. Table 4-11 sets out the reporting requirements applicable to the Project, timing of the reporting, who is responsible for managing preparation of the reports and the intended recipient(s).

Additional reporting may be necessary as the works progress. In such a circumstance, Table 4-11 will be amended to reflect these changes.



No.	Report	Requirement	Timing	Responsibility	Recipient
1	Monthly environmental report	For incorporation in Project Monthly Reports including environmental statistics (i.e., incidents, regulatory action, complaints on environmental issues), regulatory and authority considerations, monitoring program performance and key environmental issues	23rd of each calendar month.	Project Environment Manager	HWC
2	ER inspection report	Report of site environmental performance following routine inspections.	As required	ER	HWC / DPHI
3	ER monthly report	Report on Project progress and compliance status, the Project team is to provide the ER:	Monthly	ER	HWC / DPHI
		The complaints register (to be provided on a weekly basis or as requested)			
		A copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).			
4	Unexpected Finds	Manage and report unexpected finds.	Immediately to Project Forepersons and Environment Manager. As per Procedure / Protocol thereafter.	All Staff (initial notifications)AsProject Environment Manager,PrProject Director, ConstructionManager.	As required by Procedure / Pro
		- Unexpected Finds Procedure for Contamination			
		Unexpected Finds Threatened Species Protocol Unexpected heritage finds procedure			
5	Incidents	Manage and report incidents (refer section 4.8) per Project Incident Management, and Investigation Procedure, CoA A26 Incident notification, reporting and response and Appendix A2 of the Project Approval Written Incident Notification and Reporting Requirements	Immediately to Project Forepersons and Environment Manager. As per Procedure / Protocol thereafter.	All Staff (initial notifications)	As required by Procedure /
				Sustainability Manager, Project Director, Construction Manager.	Protocol, CoA
			As per CoA, within 24 hours for notification, and within 7 days for written report, and within 30 days for detailed report thereafter.		
6	Non-compliances	Manage and report non-compliances (refer Section 4.10) per CoA Non-compliance notification	Immediately to Project Forepersons and Environment Manager.	All Staff (initial notifications) Project Environment Manager	As required by
			As per CoA (within 7 days) thereafter.		
7	Complaint Reporting	Complaint management and reporting in accordance	As specified within Section 4.7.4 of the CEMP and the Communication Strategy. Environment Manager (or delegate Community and Stakeholder	Environment Manager (or delegate)	HWC / ER
		with the Communication Strategy.		Community and Stakeholder	

4.10. Environmental Non-compliances and Non-conformances

4.10.1. Environmental Non-compliance

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An environmental non-compliance is defined as one or more of the following:

- An occurrence, set of circumstances or development that is a breach of the Project Approval
- For auditing purposes, the independent auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit (Independent Audit Post Approval Requirements [DPHI, 2020])
- Failure to implement for the duration of construction the CEMP and CEMP sub-plans (Condition of Approval D8).

Where environmental non-compliances are identified, they will be communicated to the HWC Project Environment Team. HWC will report via Appendix 1 of the CoA (written notification requirements) where required. This will then be recorded in the Project database. An environmental action list will be developed and issued to the relevant Project team personnel for implementation and close out. Actions will be assigned an implementation priority in a collaborative way by the Project Environment Team based on the environmental risk. Timeframes will be set to ensure any damage incurred is rectified and any chance of recurrence is eliminated as soon as practicable. Following corrective action, the Project Environment Team will close out the non-compliance.

HWC will notify the Secretary of any non-compliance as follows:

- Notification of a non-compliance will take place via the Major Projects Website within seven days of the Project being made aware of the non-compliance
- The notification will identify the SSI (including the application number) and the name of the SSI, set out the condition/s that is non-compliant, the nature of the breach; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.

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

The ER will also include environmental non-compliances within the Environmental Representative Monthly Report.

4.10.2. Non-conformances and Opportunities for Improvement

A non-conformance is the failure to comply with an environmental requirement, standard or procedure, but does not include non-compliances as defined in the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). A non-conformity is an established process under AS/NZS ISO14001 Environmental Management Systems and is defined therein as non-fulfilment of a requirement of the ISO14001 standard or additional EMS requirements that an organisation establishes for itself. As outlined in Section 1.5.1, this CEMP has been prepared in accordance with the John Holland EMS. The John Holland EMS is certified as complying with the requirements of AS/NZS ISO 14001:2016.

Where non-conformances/improvement opportunities are identified, they will be communicated to the Project Environment Team. This will then be recorded in an environmental action list that will be issued to the relevant Project team personnel for action. Actions will be assigned an implementation priority in a collaborative way by the Project Environment Team based on the environmental risk. Timeframes will be set to ensure any damage incurred is rectified and any chance of recurrence is eliminated as soon as practicable. Following corrective action, the Project Environment Team will close out the non-conformance.

Where a non-conformance/opportunity for improvement is raised as part of an inspection, audit, or an incident or complaint investigation, the inspection, audit, incident, or complaint report will be used to close out the non-conformance/opportunity for improvement.



4.10.3. Corrective and Preventative Actions

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Corrective and preventative actions will be appropriate to the significance of the effects of the non-conformances encountered, including the environmental impacts. Information will be captured in the Project's adopted management software, including the nature of non-conformances, any corrective or preventative actions taken, and outcomes.

The Project Environment Manager (or delegate) will be responsible for investigating, tracking, communicating, and closing out non-conformances, and implementing corrective and preventative actions. Higher level non-conformances will require the Project Director to review and close out. Actions will be assigned to the relevant supervisory staff for action.

Continuous learning and improvement are integrated into all aspects of the Non-conformance management process to capture, in real time, findings that can be incorporated to improve operational effectiveness. Any member of the Project team, including subcontractors, can contribute and provide suggestion to any required or appropriate preventative actions.

The Project Environment Manager will also complete a periodic review of environmental non-conformance records to identify trends and root causes and suggest preventative actions that are warranted at an organisational level. Trends relating to environmental non-conformances will also be discussed in regular Project meetings, including with the ER and HWC, where recurring issues may indicate the need to take preventative actions.

Where assessed by the Project Environment Manager as necessary, a preventive action will be raised and implemented. Where required, the Project Director will review and approve preventative actions.

Reviews will also identify lessons learned that will be shared within the Project, HWC, and the construction industry more broadly, where appropriate.

4.10.4. Communicating Corrective and Preventative Actions to staff

The following mechanisms will be used to communicate lessons learned:

- Site improvement notices.
- Pre-start meetings.
- Toolbox talks.
- Project meetings.
- Reporting.

The Project Environment Manager will be responsible for review and approval of material for discussion and presentation of lessons learned. This will ensure that the material is fit-for-purpose, and readily understandable and implementable by our personnel, contributing to continual improvement for the Project, HWC, and broader industry.

4.10.5. Non-conformance Close-out

Where a non-conformance is detected, a report will be raised in project databases. Non-conformances will be documented with the following information:

- Date raised and by whom.
- Description of the system deficiency (non-conformance).
- Cause and proposed remedy and action to prevent recurrence.
- Reinspection information.
- Date closed and by whom.

Details included in non-conformance reports will be specific to the event that has taken place (e.g. specific reference to the CoA where a non-conformance has been identified). The Project Environment Manager will sign-off on completion of agreed actions to signify close-out.



4.11. Records and Document Control

All environmental management documents are subject to ongoing review and continual improvement. This includes times of change to scheduled activities or to legislative or licensing requirements. Only the Project Environment Manager, or delegate, has the authority to change any of the environmental management documentation.

The Project, or HWC where relevant, will coordinate the preparation, review, and distribution, as appropriate, of the environmental documents and records. During the Project, the environmental documents and records will be stored at the main site compound.

The Project will implement a document control procedure to control the flow of documents within and between HWC, stakeholders and subcontractors.

The procedure will also ensure that documentation is:

- Developed, reviewed, and approved prior to issue.
- Issued for use.
- Controlled and stored for the legally required timeframe.
- Removed from use when superseded or obsolete.
- Archived.

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The Project Environment Manager is responsible for maintaining all environmental management documents and records as current at the point of use. The master 'controlled' CEMP document will be held within the Project's document management system, in addition to the current version being available online, where it can be accessed by personnel as necessary. All paper copies of this CEMP will be considered as 'uncontrolled'.

All environmental documentation will be controlled in accordance with the Project document control requirements. Formal submissions will be managed through the Project electronic document management system (Aconex). Other documents and records will be saved in the Project shared drive on SharePoint. Access controls will be applied as appropriate.

Aconex (or equivalent) will be maintained to list the current revision of all project specific environmental documents (Plans, Protocols, Procedures, Permits and Forms) which will be consistent with the Project naming and numbering protocols. Environmental records will also be maintained and kept as objective evidence of compliance with environmental requirements. Typical records may include:

- Site inspections.
- Audits.
- Formal document reviews.
- Incident and non-conformance reports.
- Induction and training records.
- Documentation as required by performance conditions, approvals, licences, and legislation.
- Superseded versions of environmental documentation.
- Monitoring data.
- Correspondence with public authorities.
- Additional management documents and requirements as identified in the CoA and REMMs.

4.12. Review and Improvement

4.12.1. Management Review

Management reviews are undertaken as part of the continual improvement and ongoing risk analysis process. The management review can consist of group reviews, or executive reviews. Project leadership team meetings will be undertaken regularly and environmental management will be a standing agenda item as part of these meetings.

The environment agenda items may include:

- A review of the CEMP and Sub-Plans, risks, legal register, and environmental induction.
- Consideration of monitoring, inspection, and audit results.
- Consideration of incidents and any lessons learnt.



- Consideration of any new regulatory issues.
- A review of the effectiveness of erosion and sediment controls.
- Feedback from management reviews.

The outcomes of the group and executive reviews could include amendments to this CEMP and related documentation, revision to the Project's environmental management system, risk assessment review and reevaluation of the Project objectives and targets, personnel training, and education opportunities.

4.12.2.CEMP Revision

The respective Project Management Teams will review the status and adequacy of the Project EMS, including this CEMP. The objective of the review will be to ensure that it meets current HWC and the Project requirements as well as relevant environmental standards.

Continual review and improvement of the CEMP will occur in response to:

- · Issues raised during environmental inspections and/or monitoring.
- Change to scope of work.
- Changes in legislation.
- Environmental incidents.
- Environmental non-compliances.

The CEMP and an analysis of key environmental risks will be reviewed during Project construction in response to:

- Opportunities identified by HWC or the ER.
- Changes to the Project EMS.
- Non-compliances, incidents, or recurring issues.
- In response to internal or external audits.
- Changes in legislation.
- Changes in environmental management practices or technology.

In accordance with CoA A31, within three months of:

- the submission of a compliance report under condition A34;
- the submission of an incident report under condition A27;
- the submission of an Independent Audit under condition D36 or D37;
- the approval of any modification of the conditions of this approval; or
- the issue of a direction of the Planning Secretary under condition A2 which requires a review,

The strategies, plans and programs required under the approval must be reviewed, and the Planning Secretary and the ER and Certifier must be notified in writing that a review is being carried out.

4.13. Project Refinement

Changes to the Project may result from detailed design refinements or changed circumstances throughout construction. Any design changes or changes in scope of works must be communicated to the Project Environment Manager who will determine the appropriate pathway for assessment and / or approval (as the case may be) in consultation with HWC and the ER.

If required, the CEMP and Sub-plans will be updated to incorporate any additional potential environmental impacts or mitigation or management measures that resulted from the proposed changes. Affected personnel will be made aware of changes before the relevant works commence through toolbox talks, daily pre-start meeting, HSE committees or forums arranged to specifically address changes.

The following sub-sections detail the process for Project Consistency Assessments and Modifications respectively.

4.13.1. Consistency Assessments

A Consistency Assessment will be prepared to determine if a change is consistent with the Project approval. The purpose of this consistency assessment is to:

• Describe the proposed change relative to the Project approval

- Assess the environmental impacts and risks associated with the proposed change relative to the Project
 approval
- Determine if the proposed change is consistent with the Project approval or whether further approval is required in the form of a Modification.

The HWC Environmental Manager will approve all refinements that are deemed consistent with the Project Approval, where appropriate. A copy of this assessment will be provided to the ER.

4.13.2. Modification

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Should a Project modification be required (i.e., the impacts are of a nature and scale that it is not considered consistent with the Project Approval) the ER will be informed and a modification application under Section 5.25 of the EP&A Act prepared and lodged by HWC to DPHI for determination.



Appendix A Environmental Policy

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J<u>o</u>hn Holland

ENVIRONMENT POLICY

UP FOR THE CHALLENGE OF TRANSFORMING LIVES

OUR COMMITMENT

To value the natural environment and communities in which we work.

Our goal across all business activities is to use resources efficiently, minimise environmental impacts and prevent pollution, and enhance and protect the environment and our heritage.

OUR APPROACH

John Holland's four values are the platform for our everyday interactions and guide our approach to the environment.



Appendix B Biodiversity Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0014

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Appendix C Construction Soil and Water Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0021

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Appendix D Flood Emergency Response Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0024

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Appendix E Aboriginal Cultural Heritage Management Sub-Plan

Refer to CS1135-DE-BEL-EN-PLN-0001

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Appendix F Construction Traffic and Pedestrian Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0029

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Appendix G Construction Noise and Vibration Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0002

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Appendix H Construction Waste Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0022

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Appendix I Groundwater Management Sub-Plan

Refer to CS1135-WT-BEL-CO-PLN-0002

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Appendix J Offshore Construction Works Management Sub-Plan

Refer to CS1135-WT-BEL-EN-PLN-0007

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Appendix K Helicopter Transport Plan

Refer to CS1135-WT-BEL-EN-PLN-0023

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Appendix L Construction Landscaping Program

Refer to CS1135-WT-BEL-EN-PLN-0027

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