environmental management pty ltd

CONSTRUCTION WASTE MANAGEMENT PLAN

Upgrade to Dundas Public School

Revision Number:	VERSION 1
Report Date:	13/03/2025
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Prepared for:	NSW Department of Education (DoE)

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

Proponent

The Department of Education (DoE) is the landowner, proponent and determining authority pursuant to Section 5.1 of the *Environmental Planning and Assessment Act 1979* (the Act).

Landowner

The Minister for Education and Early Learning is the landowner.

Background information

The project is seeking approval for a Development Without Consent (REF) application under Part 5 of the EP&A Act.

DOCUMENT CONTROL				
ISSUE NUMBER	DATE	COMMENTS	AUTHOR	REVIEW
Draft	09/12/2024	Issue	Simon Lunn	Jo Drummond
Version 1	13/03/2025	Issue	Simon Lunn	Jo Drummond

1 INTRODUCTION

This Construction Waste Management Plan (CWMP) has been prepared to support a Review of Environmental Factors (REF) for the Department of Education (DoE) for the upgrade of the Dundas Public School (DPS) (the activity). The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) as "development permitted without consent" on land carried out by or on behalf of a public authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the T&I SEPP and in consideration of the stakeholder and community participation plan.

The proposed activity is for upgrades to the existing DPS at 85 Kissing Point Road, Dundas NSW 2117 (the site).

The purpose of this report is to document the CWMP as part of the REF planning process, addressing construction waste management measures for the activity.

Two separate waste plans have been prepared by EcCell to address the Construction and Operational Stages of the activity.

1.1 SITE DESCRIPTION

DPS is located at 85 Kissing Point Road, Dundas. The school site is bound by Kissing Point Road to the north and Calder Road to the south. Kenworthy Street is located parallel to the site to the east as is Saint Andrews Street to the west. The site has an area of 1.99 ha and comprises 1 allotment legally known as Lot 3 DP 610.

The site currently comprises an existing co-education primary (K-6) public school with 9 permanent buildings, 6 demountable structures (1 demountable includes 2 classrooms), interconnected covered walkways, play areas, on-grade parking, sports court and green spaces with mature trees.

Majority of the buildings are 1 storey with only one 2-storey building being Building A (Admin/staff hub and amenities building). Buildings are clustered to the north of the site, with the southern part comprising of a large play area/informal sports oval and a sports court.

An aerial photograph of the site is provided at Figure 1.

Figure 1 - Aerial Photograph of the Site (Source: NearMap, taken 30 October 2024)

1.2 PROPOSED ACTIVITY DESCRIPTION

The proposed activity involves upgrades to the existing DPS, including the following:

- Creation of 6 new teaching spaces and 2 learning commons in a single-story building
- Installation of covered walkways connecting the new building to the existing school network
- Landscaping and external works around the new building and eastern entry
- Upgrades to site infrastructure and services to support the new building.

After the activity, the school will be able to accommodate approximately 345 students which works out to be approximately 23 students per classroom.

Figure 2 provides an extract of the proposed site plan.

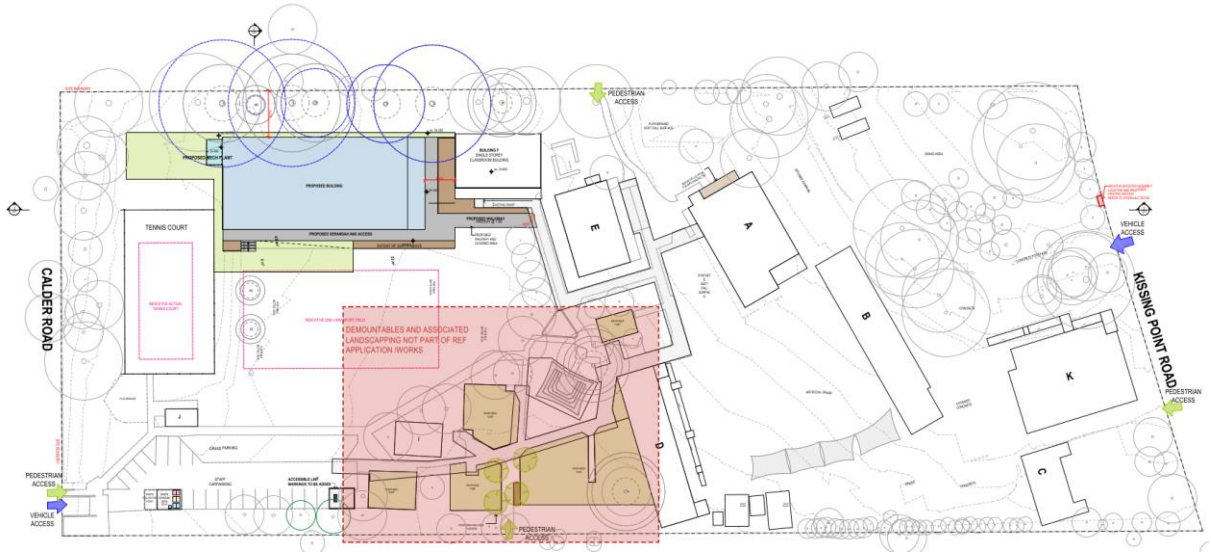

Figure 2 - Extract of the proposed site plan

2 EVALUATION OF ENVIRONMENTAL IMPACTS

As part of the REF planning pathway, this report confirms that the construction waste generated during the proposed works is not expected to result in a significant environmental impact.
The scope of the project involves construction of a new building. Although this activity will generate waste during the construction phases, the implementation of waste minimisation and management practices ensures that these potential impacts are adequately mitigated and not deemed significant.

The evaluation of the environmental impacts is summarised as follows:

1. The extent and nature of potential impacts are low and will not have significant impact on the locality, community and/or the environment.
2. Potential impacts can be appropriately mitigated or managed to ensure that there is minimal impact on the locality, community and/or the environment.

2.1 IMPACT MANAGEMENT MITIGATION MEASURES

The project aims to minimise environmental impacts associated with C&D waste by reducing the amount of material sent to landfill, maximising recycling, and responsibly managing hazardous materials. Table 1 outlines the impacts and corresponding mitigation measures.

Table 1 - Mitigation Measures

Project Stage	Mitigation Number/Name	Mitigation Measure	Reason for Mitigation Measure
C	Construction Waste Segregation	Waste from the construction phases will be comingled in skip bins and recycled off-site. Ensure waste from the site is sent to a licensed waste contractor for processing. Where feasible, separate recyclable materials on-site (e.g., metals, concrete, timber) to facilitate direct delivery to a recycling facility.	To maximise recycling and minimise landfill waste, meeting environmental goals.

Project Stage	Mitigation Number/Name	Mitigation Measure	Reason for Mitigation Measure
C&D	**Hazardous Material Management**	Identify and safely remove hazardous materials (e.g., asbestos, lead paint) in accordance with applicable regulations. Should an unexpected find of potential contamination be encountered during the works, the Unexpected Finds Protocol (see section Waste Management Strategies) should be followed.	To reduce health and environmental risks associated with hazardous waste.
D	**Waste Management Training**	Provide induction training for contractors and workers on the waste management plan, including procedures for material segregation and disposal.	To ensure compliance with waste management protocols and minimise errors.
C	**Bin and Resource Allocation**	Provide designated and clearly labelled bins for recyclables, general waste, and hazardous materials where applicable at the site.	To streamline waste segregation and improve on-site efficiency.
C	**Periodic Waste Assessments**	Conduct periodic reviews of waste management practices to ensure compliance with recycling and disposal targets.	To monitor and improve waste diversion rates and align with project goals.
C&D	**Compliance with Waste Targets**	Achieve a minimum diversion from landfill of 75% of total waste generated, in line with NSW Waste Resource and Recovery Act 2014.	To meet legislative requirements and support sustainable practices.
O	**Construction Waste Management Plan**	Ensure the preparation of a final Construction Waste Management Plan prior to the commencement of construction that is generally in accordance with this Construction Waste Management Plan, and approved by the Crown Certifier.	To ensure a structured and approved waste management approach is in place before operations begin.

*Note: Project stages include:

- (D) Design
- (C) Construction
- (O) Operation

3 OBJECTIVES OF THE CWMP

The objectives of the CWMP include:

a) Identify, quantify and classify waste streams to be generated during excavation and construction;

b) Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones) for the site;

c) To describe measures to be implemented to manage, reuse, and recycle and safely dispose of the waste;

d) To maximise reuse and recycling of construction materials and materials from the school;

e) To encourage building design techniques in general which minimise waste generation; and

f) To minimise the amount of waste being deposited to landfill with targets to reuse or recycle at least 90% of construction waste as per the "EFSG DG02 2.7.1 Construction and demolition waste requirements".

4 NSW LEGISLATIVE REQUIREMENTS AND GUIDELINES

Relevant key legislation and guidelines applicable to the project include:

- *NSW Department of Planning and Development Environmental Planning and Assessment Act 1979 (NSW)*
- *Protection of the Environment Operations Act 1997;*
- *Protection of the Environment (General) Operations Act 1998;*
- *Waste Avoidance and Resource Recovery Act 2014;*
- *Protection of the Environment Operations (Waste) Regulation 2014; and*
- Waste Classification Guidelines (EPA, 2014);

5 WASTE CONTRACTOR REQUIREMENTS

The current legislation determines that the generator of waste is the owner of the waste until the waste crosses a calibrated weighbridge into a licensed facility. Waste contractors to construction contractors are the primary transporters of waste off-site, accordingly, waste contractors will be required to provide verifiable monthly reports on waste reused, reprocessed or recycled (diverted from landfill) or waste sent to landfill. These reports have a direct bearing on the generator's compliance with the relevant regulations.

The CWMP will be implemented on-site throughout including, singularly or collectively, the excavation and construction phases.

A Waste Data File must be maintained on-site and all entries are to include:

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

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

Arrangements will be made with the waste contractor once contracted, to increase bin supply if there is an unexpected increase in waste generation.

5.1 CONSTRUCTION WASTE MANAGEMENT EQUIPMENT, BIN SIZES AND COLLECTION FREQUENCY

All waste will be removed by a licensed waste contractor using 10 m^3 to 15 m^3 bins on-site supplemented by 2 m^3 transfer bins. The construction waste will be moved off-site for recycling when bins are full and within the construction site's operating hours to reduce disturbance of the neighbours and disruption to the school.

6 WASTE MANAGEMENT STRATEGIES

The waste management strategy for the project will operate over the design, procurement and construction including fit out of the project and is detailed in Table 2.

Table 2 - Breakdown of Tasks and Responsibilities

Management Strategies	Responsibilities
Design	
• Use of modular components in design • Use of prefabricated components in design • Design for materials to standard sizes • Design for operational waste minimisation	• Architect & Engineer • Architect, Builder & Subcontractors • Architect & Subcontractors • Architect & Builder
Procurement	
• Select recycled and reprocessed materials • Select components that can be reused after deconstruction	• Architect, Engineer, Builder & Subcontractors • Architect, Engineer & Builder
Pre-construction	
• Construction Waste Management Plan to be reviewed & approved prior to construction • Contract a Waste Contractor that takes waste to a licensed facility	• Builder • Waste Contractor
Construction on-site	
• Use the avoid, reuse, reduce, recycle principles • Minimisation of recurring packaging materials • Returning packaging to the supplier • Separation of recycling of materials off-site • Audit & monitor the correct usage of bins • Audit & monitor the Waste Contractor to ensure construction waste is recycled and taken to a licensed facility	• Builder & Waste Contractor • Subcontractors • Builder & Subcontractor • Waste Contractor • Builder & Waste Contractor • Builder

6.1 ON-SITE WASTE MANAGEMENT AND STORAGE REQUIREMENTS

There will be a designated waste storage area for the disposal and storage of excavation and construction waste prior to collection. This area will be located conveniently for the work team to use

the bins as well as for waste contractors to collect. An indicative location has been provided in Appendix A. Other requirements include:

- Construction waste storage is contained wholly within the site identified in Appendix A
- The routes for movement of waste between work site and waste storage area are to be kept obstruction-free;
- The routes for movement of bins and waste between storage and collection points are marked in the site drawing, and will be kept obstruction-free (if waste is moved between the waste storage area(s);
- The waste bin collection point provided will be accessible for waste collection vehicles. There are no obstructions to turning or reversing, pulling up vehicles and lifting bins;
- Access for waste collection vehicles will not be compromised by construction-related activities vehicles or other consequences of construction staging;
- All waste not being reused on-site will be removed during, or at the completion of, the construction stage;
- No waste will be left on-site unless it is part of valid reuse on-site, which is integral to and in place in the design;
- In order to manage noise levels, collection of waste from the construction site will only occur during hours approved for construction work;
- All vehicles entering or leaving the site must have their loads covered;
- All vehicles, before leaving the site, to be cleaned of dirt, sand and other materials, to avoid tracking these materials onto public roads; and
- At the completion of the works, the work site is left clear of waste and debris.

6.2 REUSE OF EXCAVATION AND CONSTRUCTION MATERIALS

Construction Materials and off-cuts can be reused on-site. An area within the materials lay-down area will be allocated for the storage of materials to be reused.

These items include

- Plastic buckets
- Timber crates
- Timber off cuts
- Paint brushes and rollers (Wrapped in plastic to maintain moisture)
- Plasterboard offcuts
- Cardboard boxes

Clean fill will be reused on-site after verification by soil testing and Waste Classification.

6.3 MANAGEMENT OF HAZARDOUS WASTE

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

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

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

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

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

6.3.1 ASBESTOS CONTAINING MATERIALS

Non-friable ACM has been identified throughout the surveyed areas of the site (New South Wales Department of Education - Asbestos register). Prior to any disturbance works being undertaken in a building to which this asbestos register applies it will be necessary to confirm the extent of any ACM by a disturbance investigation:

- If the building was built prior to 2003
- If any ACM has been identified in the Asbestos Register for the building.

Prior to the commencement of works; it is recommended that the following work is undertaken:

- A Class A or B licensed asbestos removalist shall be engaged to remove all asbestos containing materials as identified. Removal and disposal of non-friable asbestos materials shall be

undertaken in accordance with the Work Health and Safety Act (2011), Work Health and Safety Regulation (2017) and SWNSW 2019a.

- A notification to remove non-friable asbestos shall be submitted to SafeWork NSW by the engaged Class A or B contractor prior to works commencing. No asbestos removal works should commence until receipt of the accepted notification to remove non-friable asbestos from SafeWork NSW.
- An asbestos removal control plan is to be developed by the engaged Class A or B licensed asbestos removalist prior to the removal works, outlining the specific removal methodologies and control measures necessary to minimise any risk from exposure to asbestos. Asbestos waste and asbestos impacted waste materials shall be disposed of to an appropriately licensed landfill in accordance with NSW EPA 2014.
- While not mandatory during the removal of non-friable ACM, it is considered best practice and recommended that asbestos air monitoring is undertaken during any non-friable asbestos removal works.
- Following removal works, a clearance inspection shall be completed by an independent competent person or licensed asbestos assessor (LAA) to ensure that the asbestos materials identified at the site have been removed to a satisfactory standard. Following the completion of the clearance inspection, a clearance certificate shall be issued by the independent competent person or LAA to confirm that the ACM has been successfully removed and that the site is suitable for planned works to commence.

6.3.2 UNEXPECTED FINDS PROTOCOL

An unexpected find can be defined as:

- Any unanticipated archaeological discovery e.g. aboriginal relics, items of significance, etc.;
- Buried or surface asbestos containing materials (Bonded, Friable or other);
- Buried waste materials e.g. medical waste, contaminated waste, etc.;
- Septic or underground storage tanks;
- Animal burial pits; or
- Discoloured and odorous soils and groundwater/seepage.

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

- Identified finding by worker;
- Cease work as soon as safe to do so and move clear of the finding;
- Do not tamper or attempt to remove the finding;
- Contact Construction Management immediately;
- Site Management to delineate an exclusion or quarantine zone around the area using fencing and or appropriate barriers and signage;
- Preliminary assessment of the find and need for immediate management controls;

- Further assessment and/or remediation works are required and how such works are to be undertaken in accordance with contaminated site regulations and guidelines;
- Any unexpected finds must be documented, and records of volumes and types of materials identified removed from the site must be kept on file;
- Receipt documentation from the licensed facility confirming volume received.

7 WASTE MANAGEMENT PLAN APPLICATION

Project

Upgrade to Dundas Public School

Address

85 Kissing Point Road, Dundas, 2117

Applicant

Department of Education
School Infrastructure NSW
Level 8, 259 George Street
Sydney NSW 2000

Document Acceptance

The purpose of this CWMP is to meet the key waste requirements issues for the REF Application

Description of Buildings and Other Structures Currently on the Site

The site currently comprises classroom blocks, administrative offices, 6 demountable structures (1 demountable includes 2 classrooms), covered walkways, play areas, on-grade parking, sports court and vegetation/green spaces with mature trees.

Brief Description of Proposal

Construct 6 new permanent teaching spaces and 2 learning commons.

If Materials / Waste is Reused On-site or Off-site, how will it be re-used?

- Waste from the construction phases will be comingled and recycled off-site.
- Waste from the excavation will be recycled off-site and some reused on-site.
- Clean fill will be reused on-site if required after verification and soil testing.

Prepared by:	
Name:	Simon Lunn
Signed:	
Contact Number:	0405417174
Date:	13/03/2025

8 PROJECT PHASE

8.1 EXCAVATION

MATERIAL TYPE ON-SITE	ESTIMATED VOLUME (m^3) or WEIGHT (t) (Most Favourable → Least)			ON-SITE TREATMENT	OFF-SITE TREATMENT	
	Reuse	Recycling	Disposal	Proposed Reuse and/or Recycling Collection Methods	Disposal / Transport Contractor	Licensed Waste Depot, Recycling Outlet Or Landfill Site
Organic Waste Trees & Shrubs		15 m^3		Separated to a designated tree removal company	TBA	TBA
Clean Fill	360 m^3			Separated and reused on site	TBA	TBA
Sub-Total	**375 m^3**					
Total	**375 m^3**					

Narrative: The proposed excavations on-site are minor excavation for footing/foundation. Approximately 2 large trees and some shrubs are to be lopped and processed by the tree removal company. Excavated material removed from the site will require to be classified as per the Waste Classification Guidelines (EPA, 2014) prior to disposal. **Please refer to the latest site specific Asbestos Management Plans prior to conducting any excavation works.**

8.2 CONSTRUCTION

CLASSIFICATION MATERIAL TYPE ON-SITE Waste Classification	ESTIMATED WEIGHT (t) or VOLUME (m^3)			ON-SITE TREATMENT	OFF-SITE TREATMENT	
	Reuse	Recycling	Landfill Disposal	Proposed Reuse and/or Recycling Collection Methods	Disposal / Transport Contractor	Licensed Recycling Outlet or Landfill Site
Concrete, Brick, Block Work, Render, Tiles, Stonework.		35 m^3		Co-mingled Bins	TBA	TBA
Metals		20 m^3		Co-mingled Bins	TBA	TBA
Timber Off-Cuts		28 m^3		Co-mingled Bins	TBA	TBA
Cardboard		23 m^3		Co-mingled Bins	TBA	TBA
Plasterboard		33 m^3		Co-mingled Bins	TBA	TBA
Containers, Plastics, Plastic Packaging		22 m^3		Co-mingled Bins	TBA	TBA
Pallets And Reels	14 units			Co-mingled Bins	TBA	TBA
Liquid Waste			6 m^3	Separated Container/Bin	TBA	TBA
General Waste			28 m^3	Co-mingled Bins	TBA	TBA
Floor Finishes Off-cuts, carpet, vinyl, rubber, timber			5 m^3	Co-mingled Bins	TBA	TBA
Paint Tins		2 m^3		Co-mingled Bins	TBA	TBA
Sub Total		**163 m^3**	**39 m^3**			
TOTAL	**237 m^3**			NB: An additional 14 pallets & reels (single units returned to suppliers for reuse).		

Narrative: This is a single-storey building. Works include creation of 6 new permanent teaching spaces.
As the contracts for all contractors have not been let there are still those including the waste contractor TBA.

APPENDIX A: WASTE BIN LOCATIONS & ACCESS PATHWAYS