



Preliminary Construction & Environmental Management Plan

Gledswood Hills High School

NSW Department of Education

January 2025



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Contents

- 1. Introduction..... 3**
 - 1.1 Introduction 3
 - 1.2 Summary of Activity 3
 - 1.3 Site Description 4
 - 1.4 Concept Approval 5
- 2. Construction & Environmental Management Plan 5**
 - 2.1 Crown Certificate 6
 - 2.2 Construction Program 6
 - 2.3 Hours of Work 6
 - 2.4 Stakeholder & Community Consultation 7
 - 2.5 Site Establishment 7
 - 2.6 Site Inductions 8
 - 2.7 Unexpected Finds, Heritage 9
 - 2.8 Unexpected Finds, Contamination 9
 - 2.9 Groundwater 9
 - 2.10 Soil Salinity 9
 - 2.11 Tree Protection..... 10
 - 2.12 Noise and Vibration..... 10
 - 2.13 Construction Traffic and Pedestrian Access 10
 - 2.14 Demolition & Construction Waste 11
 - 2.15 Air Quality and Dust 11
 - 2.16 Erosion and Sediment Control 11
- 3. Construction Mitigation Measures 12**
 - 3.1 Statement of Environmental Impacts 12
- Appendix A – Supporting Documentation Register 13**

1. Introduction

1.1 Introduction

This Preliminary Construction Management has been prepared by TSA Riley on behalf of the NSW Department of Education (DoE) to assess the potential environmental impacts that could arise from the development of the proposed new Gledswood Hills High School (the **Proposal**) at 9 Gregory Hills Drive, Gledswood Hills (the **site**). The works are proposed by the DoE to meet the growth in educational demand in Gregory Hills and Gledswood Hills, and the broader South-West Growth Area.

In accordance with the Environmental Management Guidelines for Construction Procurement (Edition 4), the report has been prepared to provide details including, but not limited to:

- Construction activities;
- Management of dust and odour;
- Stormwater control and discharge;
- Measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;
- Any other specific environmental construction Terms of Approval/mitigation measures detailed in the REF;
- Any requirements outlined in any relevant approvals, permits, licences or owners consents; and
- Community consultation and complaints handling in line with DoE's Community Participation Plan.

Prior to the commencement of any construction work, a Final Construction Environmental Management Plan (CEMP) is to be prepared and provided to the Crown Certifier by the Main Works Contractor.

1.2 Summary of Activity

The proposed activity involves the construction and operation of a new high school at the site accommodating 1000 students, including:

- A series of school buildings along the northern, eastern and southern site boundaries.
- A school hall.
- An assembly area, sports field and multi sports courts.
- Car parking and a Kiss and Drop zone.
- Associated on and off-site infrastructure to support the school, including a new pedestrian crossing and relocation of the existing bus stop on Gregory Hills Drive to the site frontage.

The Review of Environmental Factors prepared by Ethos Urban provides a full description of the proposed works.

The above scope of works are shown in the Site Plan in **Figure 1** below.



Figure 1 - Site Plan

1.3 Site Description

The site is located at 9 Gregory Hills Drive, Gledswood Hills, within the Camden Local Government Area (LGA), approximately 60km southwest of the Sydney CBD and approximately 3.5km from Narellan Town Centre. It comprises one lot, legally described as Lot 2 in DP 1262720, that measures approximately 4.15ha in area. The site is bound by Digitaria Drive to the north and Gregory Hills Drive to the south. To the east lies two vacant lots, a childcare centre and a fast-food outlet. To the west lies another childcare centre and a vacant lot (which also has approval for a childcare centre).

An aerial image of the site is shown at **Figure 2**



Figure 2 – Site Aerial

1.4 Concept Approval

This report has considered the concept approval (DA/2017/45/1) for a mixed-use development comprising bulky goods premises, business premises, food and drink premises, indoor recreation facilities, two hotels and a cinema. It has been determined that the concept approval is **not** applicable to the subject off this report, and implications for assessment have **not** been identified.

1.5 Statement of Environmental Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed activity, it is determined that:

- The extent and nature of potential impacts are medium and could have significant impact on the locality, community and/ or environment.
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal impact on the locality, community and/or the environment.

2. Construction & Environmental Management Plan

Prior to the commencement of any construction work, a Construction Environmental Management Plan (CEMP) is to be prepared by the Main Works Contractor and provided to the Crown Certifier. The CEMP must be prepared in accordance with the Mitigation Measures for the Review of Environmental Factors, and with the approved plans and supporting documentation.

During the construction phase, the Main Works Contractor will be responsible for ensuring all relevant personnel, including contractors and their subcontractors are aware of these mitigation measures and the requirement to undertake the works in accordance with the mitigation measures.

2.1 Crown Certificate

The Main Works Contractor will be responsible for ensuring a Crown Certificate under Section 6.28 of the *Environmental Planning and Assessment Act 1979* is to be obtained by a registered Certifier prior to any work commencing.

2.2 Construction Program

The current approximate construction program milestones of the proposal are provided in **Table 1**. A detailed construction program for the proposal will be developed by the Main Works Contractor.

Table 1: Construction Program Milestones

Milestone	Start	Finish
Construction Contract Award	Jun 2025	Jun 2025
Site Establishment	Jun 2025	Jul 2025
Civil and Bulk Excavation Works	Sep 2026	Dec 2026
Main Works Construction	Nov 2025	Nov 2026
Site Demobilisation	Dec 2026	Dec 2026

2.3 Hours of Work

The undertaking of any construction work, including the entry and exiting of construction and delivery vehicles at the site, will be restricted to the following standard work hours:

- a) Monday to Friday inclusive: Between 7:00am to 5:00pm;
- b) Saturday: Between 8:00am to 1:00pm; and
- c) Sunday and Public Holidays: No work permitted.

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

- a) Mondays to Friday inclusive: Between 6:00pm to 7:00pm; and
- b) Saturday: Between 1:00pm to 4:00pm.

Construction work may be undertaken outside of the standard and additional work hours outlined above, but only if notification has been given to the occupiers of any land within a minimum of 80 metres of the site boundaries before undertaking the work or as soon as is practical afterwards, and only if it is strictly required:

- a) By the police or a public authority for the delivery of vehicles, plant or materials; or
- b) In an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or
- c) Where the works are completely inaudible at the nearest sensitive receiver; or
- d) For the delivery of oversized equipment or structures that police or other authorities determine require special arrangements to transport along public roads; or

- e) For the delivery, setup and removal of construction cranes, where notice of the crane related works is provided to Council and affected residents at least seven days prior to the works; or
- f) maintenance and repair of public infrastructure where disruption to essential services, required system conditions (such as low-flow conditions for sewers) and/or considerations of worker safety do not allow work within standard hours; or
- g) public infrastructure works where work outside the recommended standard hours is supported by the affected community to shorten the length of the project; and

Where it is demonstrated and justified for the need to work outside the recommended construction hours. Except in emergencies, these circumstances are not to be interpreted as endorsement for work outside the recommended standard hours and should be justified in each case. Work schedule convenience or project expedience is not considered sufficient justification.

2.4 Stakeholder & Community Consultation

2.4.1 Works Notifications

Prior to the commencement of any construction work, the Main Works Contractor will be responsible for providing written notice to Council, DoE Statutory Planning Post Approval Team and the occupiers of any land within a minimum of 80 metres of the site boundaries. The notice must outline the works to be undertaken, the expected timing for commencement and expected timing for completion of construction works. A minimum period of 48 hours notification prior to the commencement of any construction work shall be given.

2.4.2 Disputes and Complaints

During construction works, the Main Works Contractor will be responsible for ensuring all complaints are managed in accordance with DoE's Community Participation Plan. On receiving a complaint, it is to be recorded and provided to the relevant DoE Project Director/Asset Manager and reviewed to determine whether issues relating to the complaint can be resolved, avoided or minimised. A response approved by the relevant DoE Project Director/Asset Manager shall be provided to the complainant within 14 days of receiving the complaint explaining what remedial actions (if any) were taken.

2.5 Site Establishment

The Main Contractor will be responsible for establishing a safe work site that mitigates the impacts of construction on the locality, community and/ or environment.

2.5.1 Site Security and Fencing

The perimeter of the construction site will be secured with either a Class A or Class B hoarding system to prevent unauthorised access and to mitigate the environmental impacts of construction works on the public and local surroundings. The Main Works Contractor will be responsible for ensuring the condition of the hoarding is maintained throughout the duration of construction works.

2.5.2 Site Access

Pedestrian and vehicle access points to the construction site to the construction site are to be clearly designated, signposted and controlled for authorised access only.

2.5.3 Site Noticeboard

Prior to the commencement of any construction work, The Main Works Contractor will ensure a site notice board must be located at eye level at the entrance or other appropriate location at the site in a prominent position for the benefit of

the community. The site notice must be displayed throughout the entire construction period, be A1 sized, durable, weatherproof and include the following information:

- d) 24-hour contact person for the site manager;
- e) Telephone and email addresses;
- f) Site works and timeframes; and
- g) Details of where accessible project information can be sourced.

2.5.4 Site Amenities

The site will provide facilities for workers including meals rooms, change rooms, and toilets. The Main Contractor will be responsible for ensuring the site amenities are clean, safe, accessible and in good working order.

2.5.5 Services and Utilities

All services and utilities in the construction area must be appropriately disconnected and reconnected as required. The Main Works Contractor is required (if necessary) to consult with the relevant authorities to determine disconnection and reconnection requirements. Where services or utilities are found not to be adequate to support the works, they are to be appropriately augmented, subject to obtaining any required approvals or permits.

2.5.6 Materials Storage

All materials must be wholly contained within the construction site. The requirements of the Protection of the Environment Operations Act 1997 are to be complied with when placing and stockpiling construction and waste materials, when disposing of waste products and during any other works likely to pollute drains or watercourses.

The use and storage of hazardous materials and dangerous goods, including petroleum, distillate and other chemicals, shall be in accordance with the relevant legislation including, but not limited to:

- a) Protection of the Environment Operations Act 1997;
- b) Work Health and Safety Regulation 2017;
- c) AS 1940:2017 The Storage and Handling of Flammable and Combustible Liquids; and
- d) Safe Work NSW Code of Practice – Managing Risks of Hazardous Chemicals in the Workplace.

A spill containment kit will be available at all times. All personnel will be made aware of the location of the kit and trained in its effective deployment.

2.6 Site Inductions

The Main Works Contractor will be responsible for ensuring all workers and visitors complete a safety induction prior to entering the worksite. It is recommended that the following information is provided to workers and visitors during the induction:

- a) The layout of the workplace including entries and exists and location of site facilities.
- b) The location of first aid facilities and emergency evacuation procedures.
- c) Site specific rules that must be complied with, e.g. PPE
- d) Hazards a risk specific to the workplace.
- e) Environmental impact mitigation measures.
- f) Safety documentation and management plans specific to the workplace.

2.7 Unexpected Finds, Heritage

2.7.1 European Heritage

A European Heritage Impact Assessment for the proposed GHHS site was completed by Umwelt as a part of a site due diligence exercise (it is not included as a part of the REF submission). The investigation determined that the site has no statutory heritage constraints and no heritage significance and therefore no requirement for a Statement of Heritage Impact. In the event that unexpected European archaeological remains are discovered during construction activities, the Main Contractor will be responsible for ensuring the following mitigation measures are implemented including, but not limited to:

- a) Cease work in the vicinity of the remains and managed
- b) Notify Heritage NSW in accordance with the Heritage Act 1977.

2.7.2 Aboriginal Heritage

An Aboriginal Cultural Heritage Assessment and Archaeological Report for the proposed GHHS site was completed by Indigeco to support the REF. The investigation determined that the site has no Aboriginal archaeological potential and therefore no requirement for further archaeological assessment. In the event of unexpected finds of Aboriginal archaeological remains are discovered during construction activities, the Main Contractor will be responsible for ensuring the following mitigation measures are implemented including, but not limited to:

- a) Cease work within the vicinity of the find of Aboriginal archaeological remains.
- b) Notify the DCCCEW in accordance with the NSW National Parks and Wildlife Act 1974.

2.8 Unexpected Finds, Contamination

A Detailed Site Investigation was completed by Geotechnique to determine the contamination status of the proposed GHHS site. Based on the site history, the site inspection, and field sampling the DSI determined that soil contaminants are either not present or present in levels that do not pose a risk of hazard to human health or the environment. In the event of unexpected finds of suspect materials during construction activities, the Main Contractor will be required to cease work within the vicinity of the suspect materials and managed in accordance with the relevant legislation and standards.

2.9 Groundwater

A Geotechnical Investigation of the site was completed by Geotechnique to support the REF. As outlined in the report, the depth of groundwater on the site is likely to be in excess of 13.0m for existing ground surface under normal climatic conditions and likely to be fresh. Should any groundwater be encountered during construction works, works are to cease immediately. Any groundwater encountered will need to be discharged from site in accordance with the relevant legislation and standards.

2.10 Soil Salinity

A Salinity Investigation and Management Plan for the site was prepared by Douglas Partners for the existing Concept DA and is required to be considered as a part of the REF. As outlined in the report, the moderately saline and very saline materials are present on the site which have potential to impact the built and natural environment. The Main Works Contractor will be responsible for ensuring a revised Salinity Management Plan is prepared that incorporates the mitigation measures including, but not limited to:

- a) Capping of the upper surface of the sodic soils exposed by excavation.
- b) Where practical, place excavated materials in areas with similar salinity characteristics.

- c) Avoid water pooling in low lying areas, depressions, or behind fill.
- d) Any pavements should be designed to be well drained of surface water.
- e) Consider salt tolerant grasses and trees for landscaping.
- f) Ensure in-ground concrete structures such as pipes, piles, footings, slabs are designed in accordance with the appropriate Australian Standards.

2.11 Tree Protection

An Arboricultural Impact Assessment for site was prepared by Creative Planning Solutions in support of the REF. As outlined in the report, no heritage listed trees were identified and no endangered species associated with any locally relevant critically endangered ecological communities were observed on the site. A total of fifteen (15) trees were observed adjoining the site on Council land of which a total of nine (9) trees recommended for retention. During construction the Main Works Contractor will be required to implement the following mitigation measures including, but not limited to:

- a) Establish Tree Protection Zones (TPZs) for the nine (9) trees recommended for retention.
- b) Ensure a certified Arborist is present to supervise and monitor any excavation, trenching, or compacted fill placement with the TPZ of retained trees.

2.12 Noise and Vibration

An Acoustic Report for the site, inclusive of Construction Noise and Vibration Criteria, has been prepared by NDY to support the REF. Based on NDYs assessment, levels of construction noise and vibration are expected to meet the criteria. The Main Works Contractor will be responsible for ensuring compliance with relevant legislation and standards and implementing the recommended mitigations measures outlined in the Acoustic Report during the construction including, but not limited to:

- a) Ensure all site personnel receive an environmental induction and are aware of the relevant project specific and standard noise and vibration mitigation measures.
- b) Installing a solid perimeter hoarding (minimum 2m in height with 17 kg/m² density) to shield the childcare centres located adjacent to the site.
- c) Time management of plant and equipment that creates excessive noise and vibration during bulk earthworks and construction phase of the project.

2.13 Construction Traffic and Pedestrian Access

A Traffic Access and Impact Assessment (TAIA) for the site, inclusive of a Preliminary Construction Traffic Management Plan, was prepared by SCT in support of the REF. As outlined in the report, the proposal will generate construction traffic that has potential to have an impact on roads infrastructure, the surrounding land uses and community, and pedestrians. The Main Works Contractor will be responsible for preparing and implementing detailed Construction Traffic Management Plan (CTMP) with consideration to the proposed mitigation measures including, but not limited to:

- a) Coordinating deliveries to ensure oversized vehicles deliver construction materials to site outside peak travel hours.
- b) Undertaking swept path assessment of to ensure vehicles delivering construction materials can make key turns enroute to the site.
- c) Provide signage on gates to ensure drivers of vehicles delivery construction materials to site.
- d) The Transport Access Impact Assessment prepared by SCT estimates the peak workforce during construction will be approximately 50 workers and the number of light vehicles generated will be 20 per day. The Main

Works Contractor will be responsible for developing a Worker Transport Strategy to ensure the impact of these vehicles on the surrounding land uses and community in general are mitigated.

- e) The Main Works Contractor will be responsible for ensuring safe pedestrian access in and around the site shall remain unimpeded at all times. Required informative signage and directional information must be provided in appropriate locations ensuring pedestrian safety. Where necessary, traffic control measures will be implemented.

2.14 Demolition & Construction Waste

A Construction & Demolition Waste Management Plan (CDWMP) for the site has been prepared by Elephants Foot to support the REF. The Main Works Contractor will be responsible for ensuring compliance with relevant legislation and standards and implementing the recommended mitigations measures outlined in the CDWMP during the construction including, but not limited to:

- a) Excavated materials will be re-used on site for landscaping, levelling, or backfilling where practical, with any excess sent to a licenced facility.
- b) All hazardous materials, including asbestos, will be managed by licenced contractors and disposed of at approved facilities.
- c) All waste generated during construction will be separated on site into dedicated bins for materials such as timber, concrete, metals, and plasterboard.
- d) Training for site staff in waste management procedures, including source separation, spill management, and legal obligations.
- e) Skip bins and stockpile areas will be managed to avoid overfilling, contamination, and environmental impacts with regular waste removal scheduled.

2.15 Air Quality and Dust

The Main Contractor will be responsible for ensuring that environmental impacts associated with air quality and dust are mitigated during construction by implementing measures including, but not limited to:

- a) Use of water sprays and dust suppressions during bulk excavation.
- b) Stockpiles of excavated materials and building materials to be kept moist or covered.
- c) Cease operation of activities such as sand blasting, spray painting, concrete cutting when wind speeds become excessive.
- d) Ensure diesel equipment is in good condition and smoke emissions are minimised.
- e) Ensure haulage vehicles leaving site have loads covered, and where deemed necessary, wheels are cleaned to ensure materials are not spread onto surrounding public roads.

2.16 Erosion and Sediment Control

A Civil Report for the site, inclusive of an Erosion and Sediment Control Plan, has been prepared by TTW to support the REF. The Main Works Contractor will be responsible for ensuring compliance with relevant legislation and standards and implementing the recommended mitigations measures outlined in the Civil Report during construction including, but not limited to:

- a) Provision of silt fencing to prevent silt waste being washed in neighbouring sites and streets.
- b) Placement of catch drawings with hay bales to carry and treat site run off.
- c) Installation of Sedimentation basins at the low point of excavation.

- d) Placement of shaker grids at the construction site entrance to ensure vehicles and machinery leave the site with clean wheels.
- e) Installation of silt protection to pits to prevent silt entering the stormwater system during construction.

3. Construction Mitigation Measures

The mitigation measures to be implemented by the Main Works Contractor during the construction phase of the proposal are provided in the Review of Environmental Factors provided by Ethos Urban. Prior to the commencement of any construction work, a Construction Environmental Management Plan (CEMP) incorporating the mitigation measures is to be prepared by the Main Works Contractor and provided to the Crown Certifier.

3.1 Statement of Environmental Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed activity, it is determined that:

- The extent and nature of potential impacts are medium and could have significant impact on the locality, community and/ or environment.
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal impact on the locality, community and/or the environment.

Appendix A – Supporting Documentation Register

Document Name	Prepared By	Revision	Date
Architectural & Landscape Design Report	DJRD	Final	19/12/24
ACHAR	Indigeco	Final	12/12/24
Acoustic Report	NDY	3.1	9/1/25
Arboricultural Impact Assessment	CPS	B	11/12/24
Civil Report	TTW	1	17/12/24
C&D Waste Management Plan	Elephants Foot	D	20/12/24
Ecology Report	Travers	Final	7/1/25
Detailed Site Investigation (contamination)	Geotechnique	1	17/1/25
Geotechnical Investigation	Geotechnique	1	20/12/24
Social Impact Assessment	Ethos Urban	2.0	19/12/24
Traffic Access and Impact Assessment	SCT	V4.0	19/12/24

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