environmental management pty ltd

CONSTRUCTION WASTE MANAGEMENT PLAN

Upgrade to Ulladulla High School

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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	24/03/2025	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 NSW Department of Education (DoE) for Ulladulla High School upgrade (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.

This document has been prepared in accordance with the *Guidelines for Division 5.1 assessments* (the Guidelines) by the Department of Planning, Housing and Infrastructure (DPHI) as well as the *Addendum Division 5.1 guidelines for schools*.

The purpose of this report is to document the CWMP as part of the REF planning process, addressing construction and demolition 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

Ulladulla High School is located at 55 South Street, Ulladulla, NSW, 2539 and is legally referred to as Lot 1 in Deposited Plan 595313. The site is located within the Shoalhaven Local Government Area (LGA) and has an approximate area of 6.5 hectares. An aerial photograph of the site is provided at Figure 1.

The site is zoned SP2 Educational Establishment and existing development comprises various buildings, a car park, landscaping, sports fields and sports courts associated with Ulladulla High School. Ulladulla High School currently comprises 61 Permanent Teaching Spaces (PTS) and 8 Demountable Teaching Spaces (DTS). Playing fields are located in the north western portion of the site.

The site is largely rectangular in shape, however, is indented in the north east corner where an early learning centre is situated outside of the site boundary on the corner of Green Street and St Vincent Street. The primary frontage to the school is along St Vincent Street to the east, with two vehicular access points to at-grade carparking areas.

Dense vegetation is located in the central and eastern portion of the site, separating the school buildings from the early learning centre. Vegetation is also concentrated along the site boundaries and around the playing fields. The surrounding locality is primarily residential to the west and south. Ulladulla Town Centre is located to the east of the site. Ulladulla Public School is located to the north of site opposite Green Street.

Figure 1 - Aerial Photograph of the Site (Source: Urbis, January, 2024)

1.2 PROPOSED ACTIVITY DESCRIPTION

The proposed activity relates to upgrades to Ulladulla High School. Specifically, the proposed activity comprises the following:

- Construction of a new two-storey home base building.
- Construction of new stairs and covered walkways.
- Upgrade works to existing internal pedestrian pathways.
- Installation of solar panels.
- External landscape works.

Any works relating to the existing demountables or associated with substations will be undertaken via a separate planning pathway. Figure 2 provides an extract of the proposed site plan.

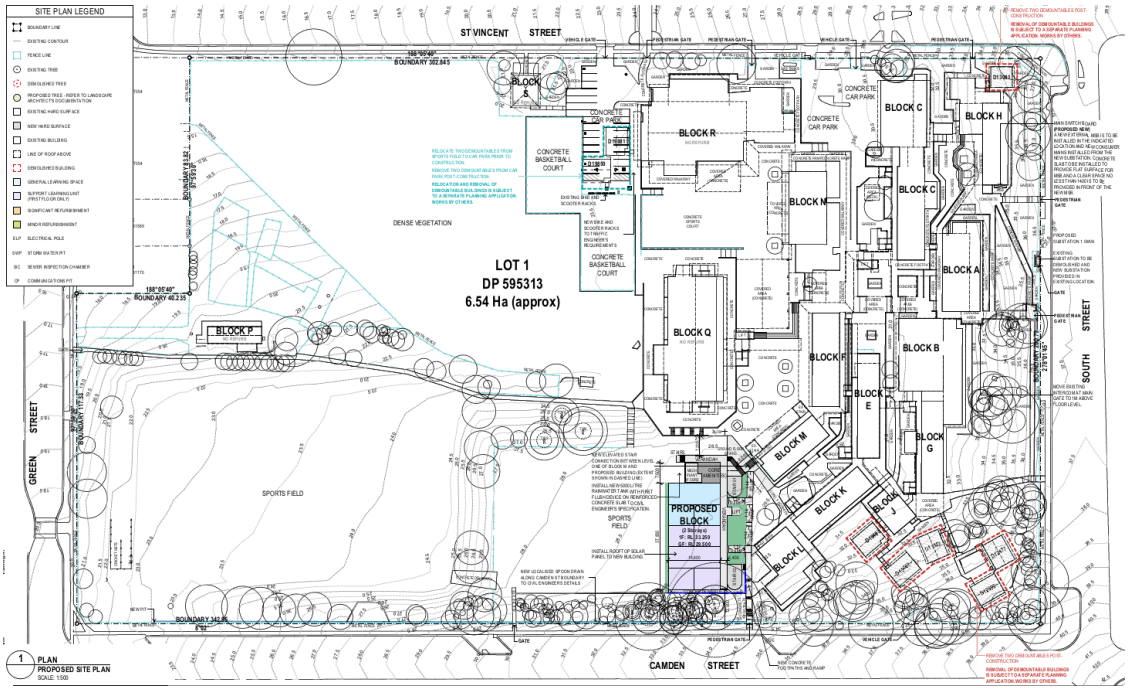

Figure 2 - Extract of the proposed site plan (*Source: Fulton Trotter, 2025*)

2 EVALUATION OF ENVIRONMENTAL IMPACTS

As part of the REF planning pathway, this report confirms that the construction waste generated during the proposed activity is not '*likely to significantly affect the environment*' (refer to Section 5.7 of the EP&A Act).

Although the activity will generate waste during the construction phase, 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 Construction and Demolition (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	C&D Waste Segregation	Waste from the demolition and construction phases will be comingled in skip bins and recycled off-site. Ensure waste	To maximise recycling and minimise landfill

Project Stage	Mitigation Number/Name	Mitigation Measure	Reason for Mitigation Measure
		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.	waste, meeting environmental goals.
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.
C	**Excavation Waste Classification**	All excavation waste removed from the site will be classified by a suitably qualified environmental consultant as per Waste Classification Guidelines Part 1: Classifying Waste (NSW EPA 2014).	To ensure excavation waste is properly classified and disposed of in compliance with regulations.
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. Achieve a minimum of 90% of construction and demolition waste of waste re-used and recycled (diverted from landfill).	To meet legislative requirements and support sustainable practices. Achieve the Green Star DG02.07.1 - Construction and Demolition Waste Credit for Responsible Construction
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 demolition, 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 and demolition 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 and demolition 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 demolition, 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 and demolition 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	

Management Strategies	Responsibilities
• Use the avoid, reuse, reduce, recycle principles	• Builder & Waste Contractor
• Minimisation of recurring packaging materials	• Subcontractors
• Returning packaging to the supplier	• Builder & Subcontractor
• Separation of recycling of materials off-site	• Waste Contractor
• Audit & monitor the correct usage of bins	• Builder & Waste Contractor
• Audit & monitor the Waste Contractor to ensure demolition and construction waste is recycled and taken to a licensed facility	• Builder

6.1 ON-SITE WASTE MANAGEMENT AND STORAGE REQUIREMENTS

There will be a designated waste storage area within the perimeters of the Construction Access Zone for the disposal and storage of demolition, 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. The Construction Access Zone is marked out in Appendix A. Other requirements include:

- Construction waste storage is contained wholly within the site (Construction Access Zone) 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;
- The contractor is responsible for the construction waste management and removal of waste upon completion of the development; and
- At the completion of the works, the work site is left clear of waste and debris.

6.2 REUSE OF DEMOLITION, 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 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

Ulladulla High School upgrade

Address

55 South Street, Ulladulla, NSW, 2539

Applicant

Department of Education
Level 8 West, 2 Central Avenue
Everleigh NSW 2015

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, sport fields, sport courts, 8 demountable structures and vegetation/green spaces with mature trees.

Brief Description of Proposal

The project includes the construction of a new two-storey home base building, new stairs and covered walkways, upgrades to internal pedestrian pathways, installation of solar panels, and external landscaping works.

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.

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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
Clean Fill	450 m^3			Separated and reused on site	TBA	TBA
Sub-Total	**450 m^3**					
Total	**450 m^3**					

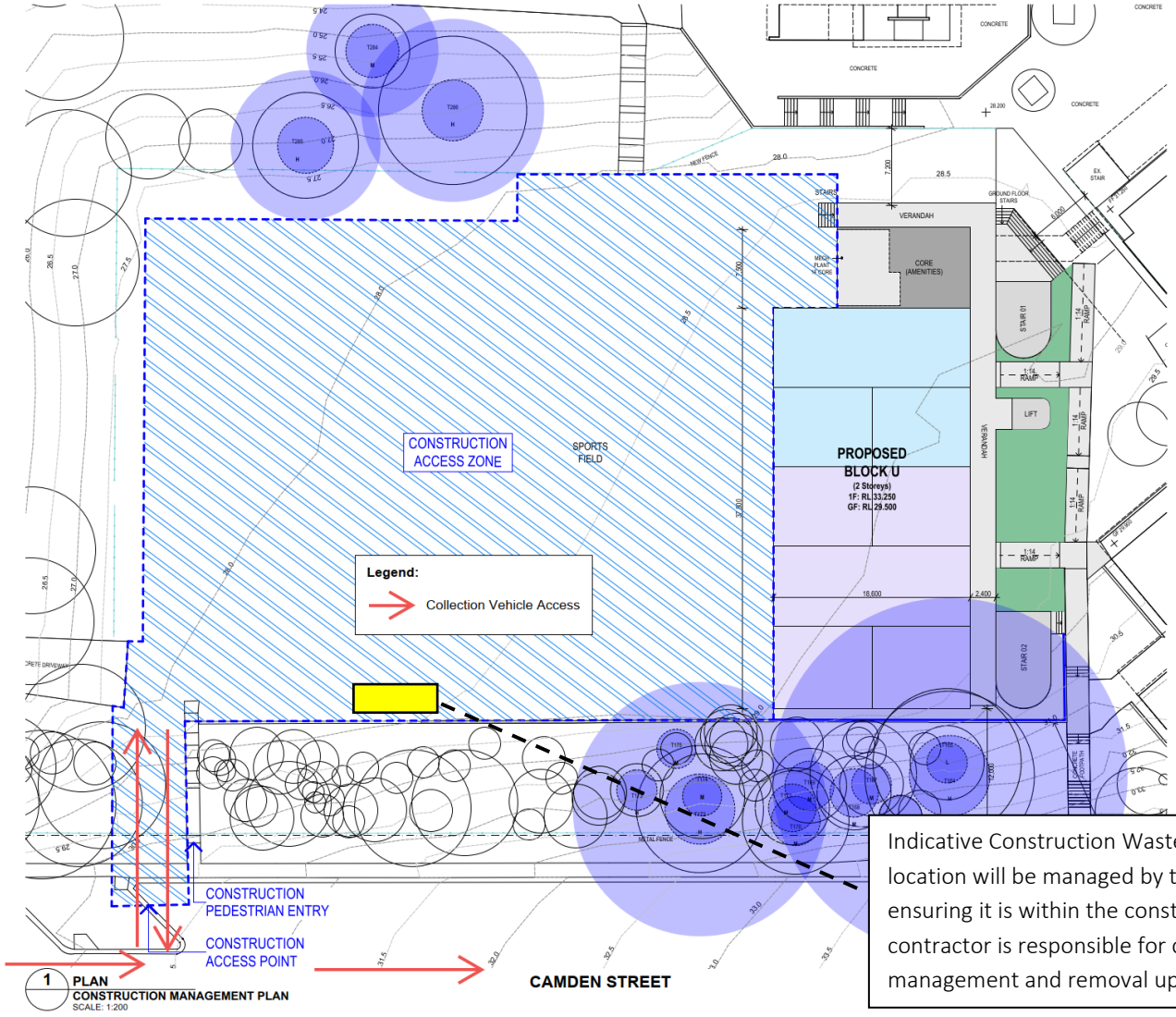
Narrative: The proposed excavations on-site are minor excavation for footings/foundation. Excavated material removed from the site will require to be classified as per the Waste Classification Guidelines (EPA, 2014) prior to disposal.
Please refer to the latest site specific Asbestos Management Plans prior to conducting any excavation works.

8.2 CONSTRUCTION

CLASSIFICATION MATERIAL TYPE ON-SITE Waste Classification Construction and Demolition Liquid Waste	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.		72 m^3		Co-mingled Bins	TBA	TBA
Metals		41 m^3		Co-mingled Bins	TBA	TBA
Timber Off-Cuts		57 m^3		Co-mingled Bins	TBA	TBA
Cardboard		46 m^3		Co-mingled Bins	TBA	TBA
Plasterboard		67 m^3		Co-mingled Bins	TBA	TBA
Containers, Plastics, Plastic Packaging		45 m^3		Co-mingled Bins	TBA	TBA
Pallets And Reels	28 units			Co-mingled Bins	TBA	TBA
Liquid Waste			12 m^3	Separated Container/Bin	TBA	TBA
General Waste			57 m^3	Co-mingled Bins	TBA	TBA
Floor Finishes Off-cuts, carpet, vinyl, rubber, timber			10 m^3	Co-mingled Bins	TBA	TBA
Paint Tins		4 m^3		Co-mingled Bins	TBA	TBA
Sub Total		**332 m^3**	**79 m^3**			
TOTAL	**411 m^3**			NB: An additional 28 pallets & reels (single units returned to suppliers for reuse).		

Narrative: This is a two-storey building. Works include creation of 11 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



Indicative Construction Waste Bin Area. The final location will be managed by the contractor ensuring it is within the construction zone. The contractor is responsible for construction waste management and removal upon completion.