

WAREHOUSE DEVELOPMENT – 191 MILLER ROAD, CHESTER HILL: STAGE 1

Waste Management Plan

15 DECEMBER 2025

Incorporating



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LOGISPACE ANZ HOLDCO PTY LTD WAREHOUSE DEVELOPMENT – 191 MILLER ROAD, CHESTER HILL: STAGE 1

Waste Management Plan

Final Report

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1 INTRODUCTION

Arcadis Australia Pacific Pty Ltd (Arcadis) has been engaged by LogiSPACE Pty Ltd (Logispace) to prepare a Waste Management Plan (WMP) for the proposed development of a warehouse development located at 191 Miller Road, Chester Hill NSW (the Project). The project is located on land legally described as Lot 82 DP 1282378 (the Site).

The Project consists of two stages:

- Stage 1: Remediation and early works (including earthworks and flooding management works), with consent to be sought under a local development pathway, and
- Stage 2: Construction and operation of warehousing and associated works, with consent to be sought under a regionally significant development pathway.

This WMP has been prepared to outline the strategies for minimising, handling, and disposing of waste generated during Stage 1 works, with the aim of maximising resource recovery, ensuring regulatory compliance, and minimising environmental impacts during remediation and early works on site. A WMP for Stage 2 will be prepared separate to this report.

1.1 Scope of works

This report has been prepared as per Council's pre-DA advice and requirements in the Canterbury-Bankstown Development Control Plan 2023 (Canterbury-Bankstown DCP), as summarised in Table 1-1.

Table 1-1: Scope of work requirements

Item	Description of requirement	Section reference (this report)
Waste	• details of the quantities and classification of all waste streams to be generated on site during the development. • details of waste storage, handling, and disposal during the development • details of the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the Canterbury Bankstown DCP 2023, Waste Management.	Section 3 and 4

1.2 The proposal site

The Site is located within the Canterbury-Bankstown Local Government Area (LGA), at 191 Miller Road, Chester Hill and is legally described as Lot 82 DP 1282378 (refer to Figure 1-1 and Figure 1-2). The subject site is an irregular shaped allotment, with a total area of approximately 64,684m². The subject site is bordered by Miller Road to the west, the Main Southern railway line to the north and warehousing to the east and south. Access to the site is obtained from Miller Road, with the northern boundary adjoining the railway corridor. The subject site has a frontage to Miller Road of approximately 144 metres.

The subject site currently has three warehouse/office buildings, located at the south-western corner and northern parts of the site. Towards the centre of the site is a grassed area with several small trees. Perimeter vegetation is also provided along the northern boundary adjacent to the railway corridor.

The Site is zoned E4 General Industrial pursuant to *Canterbury-Bankstown Local Environmental Plan 2023* (LEP). The Site is currently declared as Significantly Contaminated by the NSW EPA under the *Contaminated Land Management Act 1997*. The basis of contamination relates to soil vapour and groundwater below the site. The sources of contamination are identified by the EPA as former solvent drum storage, former wash down bays and a tank "the dome tank".

Land uses surrounding the Site includes:

- **North:** To the north of the subject site is the Main Southern railway line, which is an essential train freight connection.
- **South:** Directly adjoining the Site to the south is a recently constructed warehousing facility at No. 149 Orchard Road, with existing industrial land uses located beyond.
- **East:** To the east of the site is the Orchard Industrial Estate, which fronts Orchard Road and includes various retailers and industrial units.
- **West:** The western boundary of the Site adjoins Miller Road. On the opposite side of Miller Road is a recently constructed warehousing facility for transport and distribution at 1 Monier Square.

The Site is located on a flood control lot. The Site is not identified as a heritage item of local or state significance, nor is it located within a heritage conservation area.



Figure 1-1: Cadastral Map of the proposal site (Source: SIX Maps, 2025)



Figure 1-2: Aerial Map of the proposal site (Source: Nearmap, 2025)

1.3 Sources of information

Table 1-2 below lists the key sources of information and documents that have informed this WMP.

Table 1-2: Key sources of information

Aspect	Source
Demolition plan	- Site Plan - Demolition (Pace Architects) 250923_DA_150_A dated December 2025
Proposed site details and supporting environmental assessments	- Site Description and Existing Development dated November 2025 - Bulk Earthworks Plan - C014242.05-EW300_D dated December 2025 - Cut and Fill Plan - C014242.05-EW310_D dated December 2025 - Remedial Action Plan Rev A dated November 2025 - L01 Soil vapour Source Identification DGI – Rev 3 dated February 2021 - Detailed Site Investigation dated April 2021
Development requirements and guidelines	- Canterbury-Bankstown Council pre-DA advice dated 17/11/2025 - Canterbury Bankstown Development Control Plan 2023

1.4 Approach to waste management

The objective for waste management across the Project is to prioritise the prevention and minimisation of waste generation, followed by the effective management of wastes (storage, handling, transport, recycling and disposal) in a manner that minimises impact on the environment.

The NSW EPA waste management hierarchy has been adopted as the guiding framework for waste management of this Project, depicted in Figure 1-3. This hierarchy underpins the objectives of the Waste Avoidance and Resource Recovery Act 2001 and is a key element for guiding waste management practices in New South Wales.

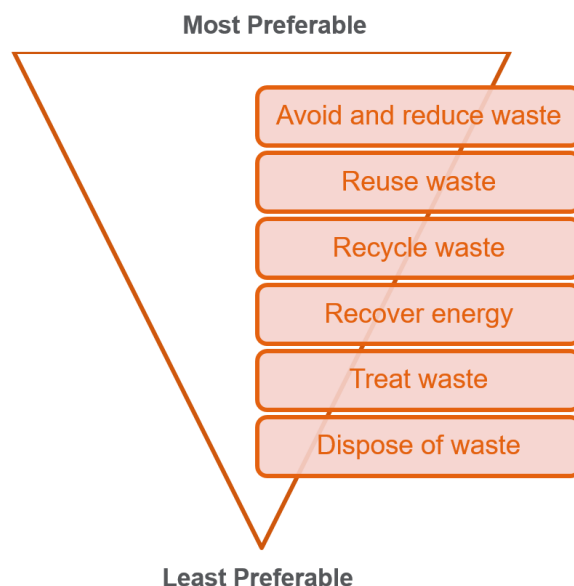


Figure 1-3: Waste management hierarchy (NSW EPA)

1.4.1 Green Star credits

The Green Star Buildings rating system provides minimum expectations and point-awarding criteria to achieve a Green Star rating for waste related design, construction and operation of buildings. For this development, two minimum expectation criteria and one point-awarding criteria are applicable (summarised in Table 1-3).

Table 1-3: Waste related Green Star criteria

Aspect of development	Requirement	Minimum expectation?	Reference to section of WMP where addressed
Responsible construction	The builder diverts at least 80% of construction and demolition waste from landfill.	Yes	Section 3 and 4
	90% of construction and demolition waste is diverted from landfill, and waste contractors and facilities comply with the Green Star Construction and Demolition Waste Reporting Criteria.	No	Section 3 and 4 includes details of expected amounts of construction and demolition waste as well as requirements for contractors to comply with the waste reporting criteria.
	The waste contractors and waste facilities must comply with the Green Star Construction and Demolition Waste Reporting Criteria.	1 point	
	Waste must be measured in kilograms		

2 LEGISLATIVE FRAMEWORK

This WMP has been prepared in accordance with relevant state and local government legislation, regulations, guidance and strategies.

2.1 National and NSW State Requirements

The following legislation and plans have been considered to guide the waste management strategy for the Project, namely:

- *National Waste Policy: Less Waste, More Resources 2018*
- *National Waste Policy Action Plan 2019*
- *Environmental Planning and Assessment Act 1979*
- *Protection of the Environment Operations Act 1997*
- *Protection of the Environment Operations (Waste) Regulation 2014*
- *Waste Avoidance and Resource Recovery Act 2001 (WARR Act)*
- *NSW Waste and Sustainable Materials Strategy 2041*
- *NSW EPA Waste Classification Guidelines 2014*
- *Contaminated Land Management Act 1997*

2.2 Local Government Requirements

The Canterbury Bankstown LEP is the principal Environmental Planning Instrument that applies to the Site. The Canterbury Bankstown DCP 2023 is to be read in conjunction with the LEP. The main waste related objectives of the Canterbury Bankstown DCP are:

- To maximise resource recovery and encourage source separation of waste, reuse and recycling by ensuring development provides adequate and appropriate bin storage and collection areas
- To ensure development incorporates well-designed and adaptable bin storage areas and collection facilities that are convenient and accessible to occupants
- To ensure bin storage and collection areas are designed to integrate with and meet the requirements for Council's domestic waste services.
- To assist in achieving Federal and State Government waste minimisation and diversion targets as set by relevant legislation, regulations and strategies.

More detailed local government requirements are outlined in Appendix A.

3 SITE REMEDIATION AND EARTHWORKS WASTE MANAGEMENT

This section identifies, classifies and quantifies the waste streams likely to be generated during the remediation and earthworks stage of the Project in accordance with the:

- NSW EPA Waste Classification Guidelines (2014),
- Protection of the Environment Operations Act 1997 (POEO Act), and
- site-specific Remediation Action Plan (RAP) (JBS&G, 12 November 2025).

3.1 Waste classification

All waste generated during remediation and earthworks will be classified in accordance with the NSW EPA Waste Classification Guidelines – Part 1: Classifying Waste (2014) and the POEO Act. The classification process ensures appropriate handling, reuse, treatment, or disposal of all material, minimising environmental impact and ensuring regulatory compliance.

The main steps in waste classification are as follows:

1. Special waste

Certain waste types such as asbestos, clinical waste, and waste tyres are classed as “special waste” and are subject to specific handling and disposal requirements. Anticipated waste types from the remediation and earthworks stage of the proposal may include:

- Asbestos waste: Any waste containing asbestos (including friable, bonded, or asbestos-contaminated soil) must be managed in strict accordance with NSW EPA and SafeWork NSW requirements, using licensed asbestos contractors and disposed of at an EPA-licensed asbestos landfill.

2. Liquid waste

Any waste (other than special waste) that:

- Has an angle of repose of less than 5 degrees above horizontal,
- Becomes free-flowing at or below 60°C or during transport,
- Cannot be picked up by a spade or shovel, or
- Is classified as liquid waste under an EPA gazettal notice

The waste generator may choose to separate liquid and solid fractions to facilitate correct classification.

3. Pre-classified waste

Many common waste types are pre-classified by the EPA:

- General solid waste (non-putrescible): e.g. concrete, bricks, glass, metal, uncontaminated soil, green waste, building and demolition waste.
- General solid waste (putrescible): e.g. food waste, animal waste, or other materials liable to decay.
- Hazardous waste: e.g. lead-acid batteries, certain chemical containers, or materials with hazardous characteristics.

4. Hazardous characteristics

Where waste is not pre-classified, an assessment must be undertaken to determine if it exhibits hazardous characteristics as defined by the Australian Code for the Transport of Dangerous Goods by Road and Rail.

5. Chemical assessment

Contaminated soils and other materials not pre-classified must be assessed using laboratory analysis (SCC and TCLP tests) to determine if they are:

- General solid waste
- Restricted solid waste
- Hazardous waste

Testing is to be performed by NATA accredited laboratory, with sampling procedures in accordance with the Guidelines and relevant Australian Standards.

6. Putrescible vs non-putrescible

For general solid waste, further assessment may be made to determine if the material is putrescible or non-putrescible.

3.2 Anticipated waste streams

Key waste streams will be anticipated to be generated during remediation and earth works phase of the project as follows:

- Contaminated Soil: Soils identified as impacted by chlorinated hydrocarbons (CHCs), petroleum hydrocarbons (including xylene), heavy metals, or other contaminants during intrusive investigations or pre-remedial works, as detailed in the RAP, will be classified as restricted solid waste or hazardous waste based on laboratory analysis.
 - On-site treatment: Where feasible and approved, certain contaminated soils (e.g., those impacted by petroleum hydrocarbons or CHCs) may undergo bioremediation or landfarming as set out in the RAP.
 - Off-site disposal: Soils exceeding criteria or unsuitable for on-site treatment will be transported to EPA-licensed hazardous or solid waste facilities for treatment or disposal.
- Asbestos-impacted soils: Asbestos has been identified in stockpiles, fill, and specific hotspots through site assessment and the RAP. All asbestos-impacted soils will be managed as special waste, under the supervision of a competent occupational hygienist or licensed asbestos contractor, and disposed of at EPA-licensed asbestos waste facilities. Some asbestos-impacted soils may also be managed on-site by engineered capping and containment, as specified in the RAP.
- Excess or unsuitable fill material: Any soil or fill not meeting geotechnical or contamination criteria will be classified through appropriate sampling and testing (VENM, ENM, restricted solid waste, or hazardous waste) and managed accordingly. Blending of unsuitable or contaminated material is not permitted.
- Construction and demolition waste: Waste from removal of pavements will be classified as general solid waste and recycled where possible; otherwise, it will be sent to a licensed landfill.

All waste streams will be assessed, sampled, and classified prior to off-site movement. Waste tracking will be maintained, and all records will be retained for compliance, validation, and audit purposes as required by the RAP and NSW EPA.

3.3 Waste quantification

During the remediation and earthworks phase, a variety of waste streams are expected to be generated, including excavated soils (both uncontaminated and contaminated), excess fill, asbestos-impacted material, building and demolition waste (concrete, asphalt, etc) and general site waste. The

following table provides indicative estimates of these waste streams based on earthworks calculations, site investigations, and the RAP. Actual quantities will be confirmed by the remediation and excavation contractor during site works, validation, and waste classification processes. All quantities are preliminary and will be refined as works progress.

Table 3-1: Indicative waste quantities during remediation and earthworks

Waste Stream	Estimated Quantity*	Management Approach
Building and demolition waste	Approximately 12,730 m ³	Recycling facility (preferred), or landfill if not suitable for recycling
Excess fill material	Minor	Classify and export to licensed facility if not reused
Contaminated soil	Volumes depending on soil testing	Segregate, sample, and dispose at EPA-licensed facility
Asbestos-impacted soils/materials	Volumes depending on soil testing	Managed by licensed contractor as special waste (per RAP)
General site waste (PPE, packaging, etc.)	Minor	Segregate, recycle where possible, dispose at licensed facility

* Estimates are indicative and subject to confirmation by the remediation and excavation contractor through ongoing validation, sampling, and classification.

3.4 Contaminated soil management

Contaminated soil, including those potentially impacted by asbestos, CHCs, petroleum hydrocarbons, or heavy metals, will be managed in accordance with the site-specific RAP, NSW EPA Waste Classification Guidelines, and SafeWork NSW requirements.

Key management steps include:

- **Assessment and classification:** All soils will be assessed through detailed site investigations and validated by a suitably qualified environmental consultant. Soil classification will be based on field screening and laboratory chemical analysis to determine the appropriate waste category (general solid, restricted solid, or hazardous).
- **Segregation:** Contaminated soils will be clearly segregated from clean materials and stockpiled separately to prevent cross-contamination and environmental impact.
- **Management options:**
 - **Onsite treatment:** Where feasible and approved by regulators, some contaminated soils (such as those impacted by petroleum hydrocarbons or selected CHCs) may be treated on-site (e.g., via landfarming/bioremediation) in accordance with the RAP.
 - **Offsite treatment/disposal:** Soils that are unsuitable for on-site treatment or exceed remediation criteria will be transported by licensed contractors to an EPA-licensed facility for treatment or disposal according to their classification.
- **Asbestos-impacted soils:** Where asbestos is present, management and removal will be overseen by a competent occupational hygienist or Class A asbestos contractor. All asbestos-contaminated soils will be handled, transported, and disposed of in accordance with NSW EPA and SafeWork NSW requirements, and sent only to EPA-licensed asbestos waste facilities.
- **Documentation and tracking:** All contaminated soil movements will be tracked using the EPA waste tracking system (for asbestos and other regulated waste) or other approved tracking systems. Records, including waste classification certificates, transport dockets, and disposal receipts, will be retained for audit and regulatory review.

3.5 Soil stockpiles

Management of soil stockpiles during remediation and earthworks will be undertaken to minimise environmental impact, prevent cross-contamination, and ensure regulatory compliance.

Clean fill stockpiles management

Clean fill will be stockpiled separately from contaminated and asbestos-impacted soils. Stockpiles will be clearly signposted and located away from sensitive boundaries or watercourses where possible. To control dust, clean fill stockpiles will be covered with tarpaulins, shade cloth, or geofabric, and dampened with water sprays during dry or windy weather. Regular inspections will ensure covers remain intact and dust suppression measures are effective.

Contaminated and asbestos-impacted soil stockpiles management

Contaminated and asbestos impacted soils will be stockpiled on impermeable sheeting with appropriate bunding and kept securely covered and dampened to suppress dust and fibre release. Access to these stockpiles will be restricted to authorised personnel, and warning signage will be installed as required. Asbestos impacted stockpiles will be removed from site as soon as practicable by licensed contractors. All stockpile management will comply with NSW EPA Waste Classification Guidelines and relevant environmental and workplace health and safety requirements.

3.6 Waste treatment and offtake

All waste generated during remediation and earthworks will be transported to NSW EPA licensed facilities appropriate for each waste class. The site excavation and remediation contractor will determine the treatment or disposal destination based on waste classification and regulatory requirements. Asbestos-contaminated soils will be managed and removed under the supervision of a qualified site occupational hygienist and disposed of at a licensed asbestos facility. All waste movements will be tracked, and records retained for regulatory compliance.

4 DEMOLITION WASTE MANAGEMENT

4.1 Demolition waste calculation

Existing structures include the following:

- Building A (650 m²) – Offices and amenities. This building is of concrete, brick and sheet metal construction and used as part of the waste processing facility.
- Building B (500 m²) – Engineering/mechanical workshop. This building is of steel frame and metal sheet construction, with a cinder block facade. The entire building is constructed on a concrete slab in generally good condition. It is understood the building was used for parts storage and mechanical repair for machinery associated with the waste processing facility and is currently not in use; and
- Building C (3500 m²) – Warehouse/distribution centre and offices/amenities. This building is of steel frame and sheet metal construction. The entire warehouse is constructed on a concrete slab in good condition. The building was used for storage and distribution of materials.
- Concrete ramp up to adjoining warehouses, concrete driveways and pavements

Site demolition will involve the removal of all existing buildings, associated structures and existing hardstands, bitumen and pavements. This process is expected to generate significant quantities of demolition waste, including concrete, asphalt, metal, brick, glass, minor fit-out materials, green waste and potentially asbestos-containing materials.

4.2 Waste generation from demolition

Waste generated from demolition works at the site is summarised in Table 4-1. The waste types and volumes presented are indicative and other waste sources and streams may be present that are not listed in this table, depending on actual site conditions.

Table 4-1: Summary of demolition waste generation and management

Waste type	Demolition phase waste volumes (cubic metre)	Reuse?	Recycle?	Disposal?	Typical waste management
Concrete	<2104	✓	✓		Concrete can be crushed into aggregate for reuse on- site or in other civil applications or landscaping.
Asphalt	minor		✓		Asphalt waste from the site can be sent to offsite recycling facilities for conversion to Reclaimed Asphalt Pavement (RAP). RAP is a common use for end-of-life asphalt road coverings.
Bricks	<970	✓	✓		Crushed for use as road base or can be sent to offsite recycling facilities.
Glass	minor	✓	✓		Glass can be crushed at an external C&D waste facility to produce glass sand. Otherwise, extraneous, good quality glass panels can be reused in other building applications.
Metals – Ferrous and non-ferrous	<2.2	✓	✓		Metals can be recycled and would be transported to a suitably licensed facility.
Garden organics/green waste	<18,000	✓	✓		Garden organics can be mulched and repurposed on site. Garden organics can also be composted at a suitably licensed facility.
Asbestos containing materials	Volumes depending on soil testing			✓	Identified, removed, and disposed of at EPA-licensed asbestos waste facility by licensed contractor.

4.3 Demolition waste management

4.3.1 Waste minimisation

Where feasible, structures would be demolished in a way that would maximise the opportunity for beneficial reuse of materials that are in good quality. For example, reusable steel beams, undamaged bricks, pavers, and quality glass panels will be salvaged where feasible. Soft stripping of fixtures and fittings will be prioritised before major demolition to increase recovery and reuse rates.

4.3.2 Waste storage

All waste generated on site will be stored in bins or skips segregated by material type (as indicated in Table 4-1, however this is not an exhaustive list and bins for other waste streams may apply). Bins will largely constitute skip bins of a range of sizes, and for smaller waste streams 240L MGBs will be provided. Special wastes or hazardous wastes (e.g., asbestos) will be managed separately in accordance with the waste type, and statutory and best practice requirements.



Figure 4-1: Indicative location of demolition waste storage area

The demolition waste storage area is to be confirmed by the construction management team upon commencement of works and may be relocated as demolition progresses. At a minimum, the waste storage area location selection will take into account environmental factors including slope, drainage, location of watercourses, proximity to native vegetation and amenity impacts (such as dust emissions from waste and noise from collection) on occupants of neighbouring properties.

Bins will be clearly marked according to its contents and be positioned in an area that is easily accessible for collection vehicles, away from stormwater drainage infrastructure, clear of overhead obstacles, and covered when not in use to avoid the risk of creating windblown litter.

Examples of bin signage are provided in Figure 4-2 below.



Figure 4-2: Example signage for waste bins

4.3.3 Waste access and collection

A licenced waste contractor will be engaged to collect demolition waste from the site throughout the demolition phase. Vehicle access to the waste storage area will be provided via Miller Road or designated site driveways, as detailed in the project's Traffic Management Plan.

Waste collection will be performed by an appropriately licensed waste collection contractor, and all wastes will be transported to appropriately licensed facilities, suitable for each waste type. The waste collection contractor will be responsible for transportation of waste in accordance with the requirements of the *Protection of the Environment Operations Act 1997*.

All wastes that cannot be reused or recycled will be disposed of in accordance with the *Protection of the Environment Operations Act 1997* and the *Waste Avoidance and Resource Recovery Act 2001*.

Hazardous waste will be removed by an accredited contractor and treated or disposed of at an EPA licensed facility.

4.3.4 Special or hazardous wastes

Any asbestos or other hazardous materials identified during demolition will be managed and removed by appropriately licensed contractors, following all relevant legislative and safety requirements. These materials will be transported to, and disposed of at, EPA licensed hazardous waste facilities.

4.3.5 Waste contractor and waste facilities

Contractors engaged for the collection and transportation of waste materials generated from demolition stage are to be selected taking into account past and current environmental performance, qualification and licensing, and destination and fate of wastes. Contractors that prioritise reuse and recycling of materials will be given higher preference.

The demolition contractor will also be responsible for retaining waste dockets from the waste collection contractor.

Waste facilities are to be selected with preference given to high rates of recovery, environmental performance, and proximity to the Site. Potential options for receiving waste facilities include Cleanaway in Eastern Creek, or Bingo Recycling in Greenacre.

4.3.6 Record keeping

Accurate records will be kept of all wastes generated throughout demolition stages. Waste dockets confirming the receiving facility for each load will be retained on site in accordance with regulatory requirements.

To enable compliance with Green Star waste reporting requirements, the waste contractor must provide accurate monthly and cumulative waste reports that detail both the total weight of waste removed from the project site, as well as the waste processing facilities where all loads are disposed. Reporting accuracy must be within an average five per cent margin of error.

Inspections of these dockets may be required by authorised persons. Details of waste types, volumes and destinations will be recorded in a Waste Management Register. An example Waste Management Register is available in Appendix B.

APPENDIX A **Canterbury Bankstown DCP 2023** **Requirements**

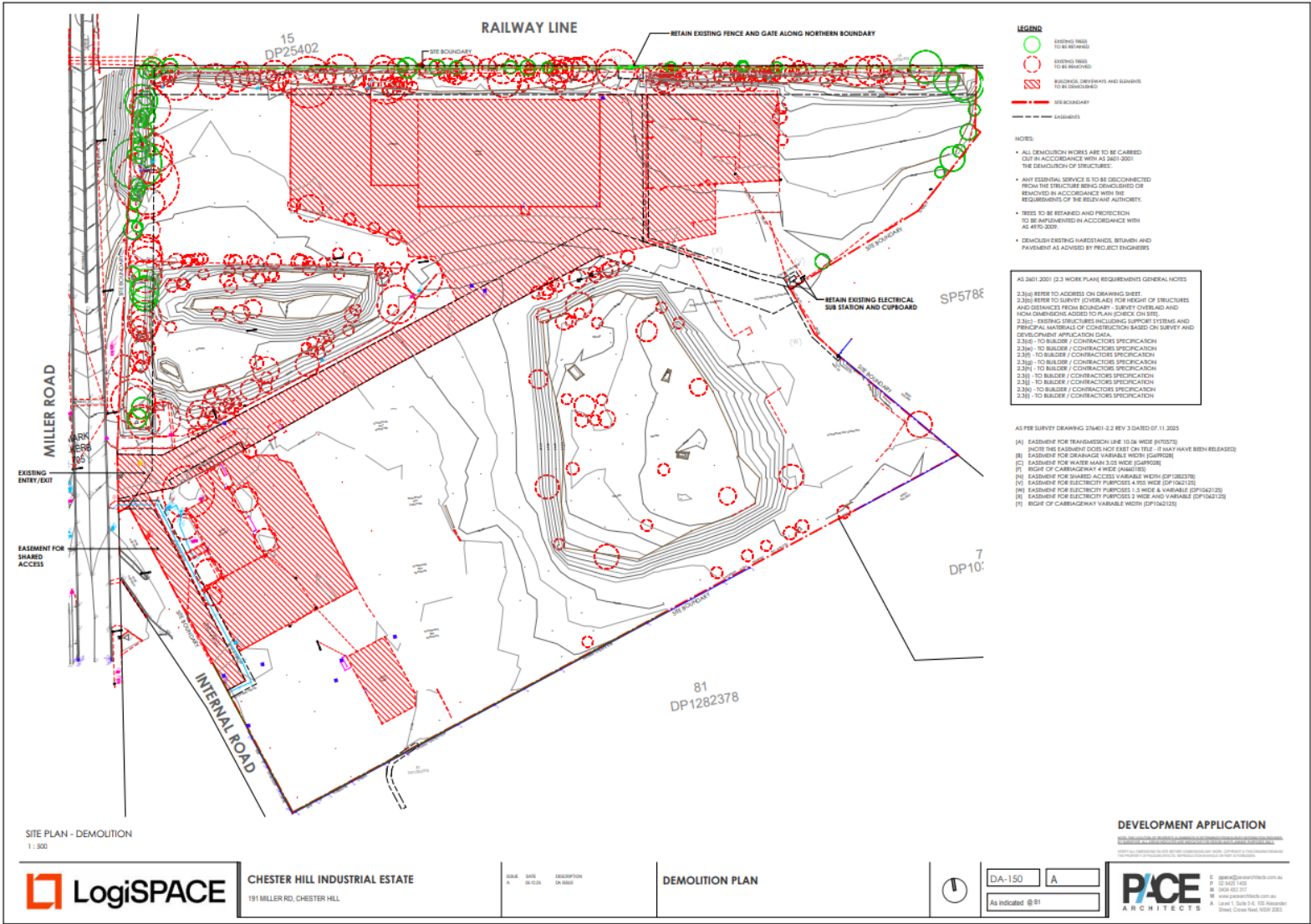
Construction and demolition Waste	
Requirement	Reference to location in WMP
Size and location(s) of waste storage area(s)	Section 4.3.2
Access for waste collection vehicles	Section 4.3.3
Types and numbers of storage bins likely to be required	Section 4.3.2
Maximise resource recovery	Section 4.3.2

APPENDIX B WASTE MANAGEMENT REGISTER

Date	Time	Waste Classification*	Waste Description	Quantity (tonnes and/or m³)	Waste Use (reuse, recycled, stockpiled or disposed)	Transporter	Receiving Facility	Invoice Number and/or Receiving Facility Reference

* In accordance with the *NSW Waste Classification Guidelines (2014)*

APPENDIX C DEMOLITION PLAN



[illegible]

