

Revision 1

Blocks 4&5, Section 38, Campbell Construction Environmental Management Plan

Prepared for

Doma Group

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Ecology and Heritage Partners Pty Ltd

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Revision 0	Alterations made to the position titles and the distribution of responsibilities for Bloc	Richard Sharp	15/12/2021
Revision 1	The description of the residential apartment building is now slightly different, and the building contractor is no longer Bloc and PBS and is now Chase Construction.	Richard Sharp	08/05/2025

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CONTENTS

1	INTRODUCTION	5
1.1	The development	5
1.2	Requirement for this CEMP	5
1.3	Structure of this CEMP	5
1.4	Potential impacts to the environment during construction	5
1.5	Strategies to address environmental impacts during construction	5
2	CONDITIONS OF APPROVAL	6
2.1	DCP 19/02.....	6
2.2	EPBC approval decision	6
3	PROJECT DESCRIPTION	8
3.1	Civil and infrastructure works.....	8
3.2	Residential apartment building construction	8
3.3	Residential townhouse construction	8
4	OBJECTIVES OF THIS CEMP	9
5	ROLES AND RESPONSIBILITIES	10
5.1	Doma Group	10
5.2	D Group	10
5.3	Chase Construction.....	11
6	REPORTING	12
6.1	EPBC reporting	12
6.2	Monthly progress reporting	12
7	ENVIRONMENTAL TRAINING.....	13
7.1	Site inductions	13
7.2	Toolbox talks.....	13
8	EMERGENCY CONTACTS AND PROCEDURES.....	14
8.1	Water pollution	14
8.2	Land pollution.....	14
8.3	Disturbance of Aboriginal sites.....	14
8.4	Injured or orphaned native wildlife	14

9	POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS	15
9.1	EPBC related impacts and risks.....	15
9.2	Other environmental impacts and risks.....	16
10	ENVIRONMENTAL MANAGEMENT	17
10.1	EPBC management measures.....	17
10.2	Other management measures.....	18
10.3	Environmental monitoring.....	19
10.4	Corrective actions.....	20
11	AUDIT AND REVIEW	21
11.1	Environmental auditing	21
11.2	Environmental management plan review.....	21
12	GLOSSARY	22

Table 1: Potential impacts that are related to the EPBC.....	15
Table 2: Potential impacts that are related to the project being in the ACT.....	16
Table 3: EPBC related environmental management measures.....	17
Table 4: ACT related environmental management measures.....	18
Table 5: Monitoring requirements.....	19

1 INTRODUCTION

1.1 The development

The development to which this CEMP applies is the residential construction and associated civil and landscape works located on Blocks 4 and 5 of Section 38 (the site) in the suburb of Campbell in the ACT.

1.2 Requirement for this CEMP

The requirement for this CEMP stems from the EPBC approval decision (EPBC 2104/7372) which stipulates that the approval holder must prepare and document a management plan for the duration of the construction phase.¹

1.3 Structure of this CEMP

The structure of this CEMP is based primarily on an Australian Government document titled *Environmental Management Plan Guidelines*.²

1.4 Potential impacts to the environment during construction

The potential impacts to the environment during construction have been identified as part of EPBC assessment process and are documented in the Final Preliminary Documentation report.³ For more details, refer to section 9 of this CEMP.

1.5 Strategies to address environmental impacts during construction

The strategies to address environmental impacts during construction have been identified as part of EPBC assessment process and are documented in the Final Preliminary Documentation report. The report identifies two strategies, and they are as follows:

1. Avoidance
2. Mitigation

For details of the management measures associated with these two strategies, refer to section 10 of this CEMP.

¹ The approval holder is Lakeview Holdings (ACT) Pty Ltd

² Guidelines published by the Department of the Environment (2014)

³ Report prepared for Doma Group by Biosis Pty Ltd (24 November 2017)

2 CONDITIONS OF APPROVAL

2.1 DCP 19/02

In a letter dated 26 February 2021, the NCA advised the Doma Group that the proposed redevelopment works of Blocks 4 and 5, Section 38, Campbell are not inconsistent with the relevant provisions of the approved DCP 19/02, Concept Plan and the National Capital Plan. In regard to environmental issues during the construction phase, the NCA letter of consistency points out that:

- Works are to be undertaken in accordance with the manner described by then Department of the Environment and Energy in its decision on EPBC Referral No. 2014/7372.
- All visible surface Aboriginal artefacts of the artefact scatter identified in the Cultural Heritage Assessment report (5 November 2020), are to be collected prior to construction commencing and repositioned nearby in consultation with relevant Aboriginal community representatives.
- If any archaeological remains are uncovered during the works, construction activity is to cease and should be reported to ensure appropriate protocols are followed in relation to the assessment and management of artefacts.
- All existing trees are to be adequately protected for the duration of the works.

2.2 EPBC approval decision

According to the EPBC approval decision, there are a number of conditions of the approval that apply to the construction phase, and they are as follows:

Condition 1

To minimise the impacts of the approved action, the approval holder must not clear more than 0.47 hectares of EPBC listed Natural Temperate Grassland of the South Eastern Highlands at the approved action site.

Condition 2

To minimise the impacts of the action, the approval holder must not clear more than 0.78 hectares of Golden Sun Moth (*Synemon plana*) habitat at the approved action site.

Condition 3

To minimise impacts during the construction phase to protected matters, the approval holder must prepare a documented management plan to ensure there is no net loss to the extent and condition of protected matters (relative to the extent and condition of protected matters presented in the Final Preliminary Documentation). The management plan must be implemented from the commencement of the action and for the duration of the construction phase. Requirements of the plan must include but are not limited to measures that:

- a) Avoid disturbance to protected matters.

- b) Avoid the introduction and spread of weeds to protected matters.
- c) Avoid impacts from herbicide use to protected matters.
- d) Avoid sedimentation and erosion impacts to protected matters.
- e) Prevent pest and feral predator impacts to protected matters; and
- f) Protect mature trees along Quick Street road reserve and Limestone Avenue road reserve, verge, public open space and on unleased Territory land.

Condition 15

The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans required by condition 3 of this approval of this approval, and make them available upon request to the Department.

Condition 19

Unless otherwise agreed to in writing by the Minister, the approval holder must publish all management plans reports and agreements referred to in these conditions of approval on their website. Each management plan, report and agreement must be published on the website within 1 month of being finalised. Documents must remain published for the life of the approval.

3 PROJECT DESCRIPTION

3.1 Civil and infrastructure works

This civil and infrastructure work will include the removal/relocation of existing infrastructure, installation of new infrastructure directly associated with the approved residential development, bulk civil works including excavation and removal of material from site.

3.2 Residential apartment building construction

This residential apartment building (Precinct 1) construction will consist of two levels of basement which sits below two nine level buildings (Ground – L8) making up a total of 136 apartments.

3.3 Residential townhouse construction

This residential townhouse construction will include four separate townhouse precincts totalling 81 townhouses with associated landscaping works.

4 OBJECTIVES OF THIS CEMP

The objectives of this CEMP are to:

- Provide an overarching management document that provides a framework under which all construction contractors can then enhance their own EMPs for their respective construction activities.
- Identify the environment management reporting and training targets that all construction contractors will need to achieve.
- Outline a set procedure for environmental emergencies that all construction contractors will need to follow.
- Describe the environment management measures that must be implemented by all construction contractors.
- Explain the arrangements for auditing environmental performance that will apply to all construction contractors.

5 ROLES AND RESPONSIBILITIES

5.1 Doma Group

Development Manager

The Development Manager will be responsible for:

- the approval of this CEMP including any revisions;
- the distribution to the construction contractors of the CEMP including any revisions;
- the publication on the project website of this CEMP including any revisions within 1 month of the approval of the document;
- providing monthly feedback to the construction contractors on their environmental performance;
- receiving and responding to any environmental complaints received that relate to construction activities;
- coordinating all environmental emergencies associated with construction activities;
- arranging audits of each construction contractor with respect their compliance with this CEMP;
- providing monthly feedback to the construction contractors on their environmental performance; and
- liaising with the NCA and DCCEEW about any environmental non-compliance with respect to the project approvals.

5.2 D Group

Site Manager

The Site Manager will be responsible for:

- ensuring D Group compliance with this CEMP including any revisions; and
- ensuring consistency with this CEMP and all related D Group project management plans.

Environmental, Health and Safety Manager

The Environmental, Health and Safety Manager will be responsible for:

- ensuring environmental management information is included in the D Group monthly project progress reports to the Doma Group;
- coordinating all environmental emergencies associated with D Group construction activities;
- ensuring any D Group non-compliance identified from the Doma Group monthly environmental audits is promptly corrected; and
- providing monthly feedback to the D Group construction team on their environmental performance.

- monitoring D Group compliance with this CEMP including any revisions;
- collating and maintaining D Group project records which relate to compliance with this CEMP;
- arranging environmental training for the D Group construction team;
- responding to all environmental emergencies associated with D Group construction activities; and
- providing access to D Group project documents during the Doma Group monthly environmental audits.

5.3 Chase Construction

Project Manager

The Project Manager will be responsible for:

- ensuring Chase Construction compliance with this CEMP including any revisions;
- ensuring consistency with this CEMP and all related Chase Construction project management plans;
- ensuring environmental management information is included in the Chase Construction monthly project progress reports to the Doma Group;
- coordinating all environmental emergencies associated with Chase Construction activities;
- ensuring any Chase Construction non-compliance identified from the Doma Group monthly environmental audits is promptly corrected; and
- providing monthly feedback to the Chase Construction team on their environmental performance.

Site Safety Coordinator

The Project Engineer will be responsible for:

- monitoring Chase Construction compliance with this CEMP including any revisions;
- collating and maintaining Chase Construction project records which relate to compliance with this CEMP;
- arranging environmental training for the Chase Construction team;
- responding to all environmental emergencies associated with Chase Construction activities; and
- providing access to Chase Construction project documents during the Doma Group monthly environmental audits.

6 REPORTING

6.1 EPBC reporting

Within 1 month of being approved by the Development Manager, this CEMP and any revisions will be published on the project website and will remain published until 30 June 2048.

6.2 Monthly progress reporting

Each month, construction contractors are required to provide environmental management information as part of their respective project progress reports to the Doma Group. This information will include but not be limited to the following:

- Environmental training conducted during the reporting period
- Environmental incidents that have occurred during the report period
- Corrective-actions undertaken in response to the monthly environmental audits

7 ENVIRONMENTAL TRAINING

7.1 Site inductions

Site inductions prepared and delivered by each construction contractor are required to mention:

- this CEMP including any revisions;
- the details of the project approvals as outlined section 2 of this CEMP; and
- the details of the environmental management measures as outlined in Table 2 of this CEMP.

7.2 Toolbox talks

Toolbox talks on specific environmental topic relevant to the site and the works are to be conducted each month by each construction contractor and appropriate records are to be kept verifying what was discussed and who attended the toolbox talk.

8 EMERGENCY CONTACTS AND PROCEDURES

8.1 Water pollution

Pollution Type	Organisation	Phone Number
Stormwater / Waterways	ACT EPA	13 22 81 - Access Canberra Contact Centre (24 hours)
Sewer	Icon Water	6248 3111

If the water pollution threatens public health, property, or the environment then the ACT Fire Brigade should be contacted for emergency assistance on 000.

8.2 Land pollution

Pollution Type	Organisation	Phone Number
Chemicals / Contaminated sites	ACT EPA	13 22 81 - Access Canberra Contact Centre (24 hours)

If the chemical pollution threatens public health, property, or the environment then the ACT Fire Brigade should be contacted for emergency assistance on 000.

8.3 Disturbance of Aboriginal sites

Organisation	Phone Number
ACT Heritage	13 22 81 - Access Canberra Contact Centre

Disturbance to Aboriginal sites must be avoided. Authorised compliance officers can issue immediate fines of \$1000 to an individual or \$5000 to a corporation for damage to Aboriginal places or objects, regardless of whether they can be repaired.

8.4 Injured or orphaned native wildlife

Organisation	Phone Number
ACT Parks and Conservation Service	13 22 81 - Access Canberra Contact Centre (24 hours)

Native wildlife is protected by law and may not be killed unless they threaten life. Offences under the *Nature Conservation Act 2014* carry severe penalties.

9 POTENTIAL ENVIRONMENTAL IMPACTS AND RISKS

9.1 EPBC related impacts and risks

The potential environmental impacts during construction that have been identified and analysed in terms of risk as part of the EPBC assessment process are listed below in Table 1.

Table 1: Potential impacts that are related to the EPBC

No	Potential Impacts – EPBC
1	Permanent removal of up to 0.47 hectares of high to very high condition native grassland consistent with the critically endangered ecological community Natural Temperate Grassland of the South Eastern Highlands.
2	Permanent removal of up to 0.78 hectares of known habitat for the critically endangered Golden Sun Moth.
3	Removal of up to 100 planted native trees over an area of 2.50 hectares.
4	Deposition of dust generated from the demolition of existing infrastructure and the construction of the proposed development resulting in degradation of 1.68 hectares of Natural Temperate Grassland and associated flora and fauna habitat adjoining the site boundary.
5	Changes in hydrological regime experienced by grassland, including reduction in over-land and sub-surface flows due to capture and retention of storm water within the proposed development footprint and increase in storm water run-off from the proposed development.
6	Weed encroachment into grassland and associated flora and fauna habitat during construction of the development and from landscaped areas and private gardens during the operation of the proposed development.
7	Alteration of the nutrient status of grassland areas within and beyond the referral boundary due to run-off, including sedimentation during construction of the proposed development.
8	Damage to grassland and associated flora and fauna habitat within and beyond the referral boundary caused by overspray and/or run-off of herbicide used in weed management (during demolition and construction works) and management of landscaped areas and private gardens during operation of the proposed development.
9	Further degradation of 0.72 hectares of Box Gum Woodland and associated flora and fauna habitat) within the broader study area as a result of alteration of hydrology, soil nutrients and weed invasion during construction works.
10	Reduction in connectivity between suburban habitats of Campbell and adjoining suburbs with remnant bushland of the Mount Ainslie and Mount Majura Nature Reserve.
11	Degradation of Golden Sun Moth habitat as a result of shading from the buildings, equipment or landscape plantings.
12	Trampling of grasslands, Box Gum Woodland understorey strata and associated flora and fauna habitats as a result of increased human use of the area within the referral boundary and adjoining areas.
13	Increased predation of native fauna, including important bird and invertebrate species as a result of increased abundance of domestic, stray, feral or introduced animal species, primarily cats.

9.2 Other environmental impacts and risks

Other potential environmental impacts during construction that have been identified and analysed in terms of risk in the context of this project being in the ACT are listed below in Table 2.

Table 2: Potential impacts that are related to the project being in the ACT

No	Potential Impacts – ACT
1	Vehicles tracking dirt and mud from inappropriate access arrangements is a major problem and can result in sediment entering drains and kerb gutters.
2	Concrete and mortar can block stormwater drains and gutters, and cement can raise the pH within drains and kerb gutters which guide stormwater to Lake Burley Griffin, having a huge impact on aquatic animals and plants.
3	Acrylic and oil based paints can have a significant negative, even in small amounts, if it enters drains and kerb gutters which guide stormwater to Lake Burley Griffin.
4	Concrete run-off from concreting operations has the potential to cause pollution if allowed to enter the stormwater system, which is connected to Lake Burley Griffin.
5	Construction activities have the potential to generate noise which can be a nuisance to local residents.

10 ENVIRONMENTAL MANAGEMENT

10.1 EPBC management measures

The environmental management measures that have been identified and considered appropriate as part of the EPBC assessment process are listed below in Table 3. These measures involve either avoidance or mitigation.

Table 3: EPBC related environmental management measures

ID	Management Measures – EPBC
EPBC 1	Direct impacts to Natural Temperate Grassland in the east of the study area have been avoided as the masterplan locates all buildings and amenities within Block 4 and 5 of Section 38.
EPBC 2	Direct impacts to Golden Sun Moth habitat in the east of the study area have been avoided as the masterplan locates all buildings and amenities within Block 4 and 5 of Section 38.
EPBC 3	During construction, an ecologist / qualified fauna catcher will be on site to assist with tree removal to minimise impacts to native fauna that may be resident in trees when removed.
ECPB 4	During construction, dust will be suppressed by: <ul style="list-style-type: none"> - Retaining existing vegetation (where possible) - Progressively striping of areas - Spraying water to dampen the ground during construction - Restricting vehicle movements - Covering all loads, if transporting soil material from site
EPBC 5	The development footprint and construction activities will lie outside the catchment of Natural Temperate Grassland beyond the site boundary.
EPBC 6	During construction, weeds will be managed by: <ul style="list-style-type: none"> - Identifying any ACT declared pest plants in the works area at the start of construction, marking the affected areas on relevant site maps and communicating this to site personnel - Implementing weed hygiene protocols for all vehicles and equipment entering and exiting the site - Monitor for the incursion of any ACT declared pest plants at the perimeter of the site
EPBC 7	At the commencement of construction, silt fencing will be installed around the perimeter of the works area to ensure no sedimentation impacts to protected matters within and beyond the site boundary. During construction, any soil stockpiles to be located away from drainage lines and surface flow paths.
EPBC 8	During construction, pest plant suppression and containment, in particular the containment of Chilean Needle Grass will be undertaken, by a suitably qualified person at the appropriate time and season so as to minimise the likelihood of overspray or damage to retained vegetation within and adjacent to the site boundary.
EPBC 9	During construction, sedimentation will be managed by maintaining the silt fencing that is installed around the perimeter of the works area.
EPBC 10	At the commencement of construction, tree protection fencing will be installed to minimise inadvertent damage to mature trees which may provide habitat for protected matters within the site boundary.
EPBC 11	At the commencement of construction, facilities and equipment related to construction activities will be positioned away from the northern and western boundary of the site boundary so as not to shade areas of adjoining Golden Sun Moth habitat.

EPBC 12	<p>During construction:</p> <ul style="list-style-type: none"> - Site access will be from Limestone Avenue and the informal road access from Quick Street only and all parking, equipment storage, etc. will be within the site boundary. - Site perimeter fencing will be installed and maintained for the duration of construction to ensure inadvertent damage to adjoining areas does not occur.
EPBC 13	<p>During construction waste enclosures will be used for all rubbish on site and rubbish will be removed when required.</p>

10.2 Other management measures

The environmental management measures that have been identified and considered appropriate given the project is located in the ACT are listed below in Table 4. All of these management measures are mitigation actions.

Table 4: ACT related environmental management measures

ID	Management Measures – ACT
ACT 1	At the commencement of construction, a stabilised access point consisting of a stabilised pad of aggregate underlain with geotextile fabric will located at any point where construction traffic will be entering or leaving a site at a public road, street, open space or parking area.
ACT 2	At the commencement of construction, a designated area will be identified and signposted away from any drains for cutting bricks, concrete or tiles, mixing cement or mortar, or washing equipment.
ACT 3	<p>During construction:</p> <ul style="list-style-type: none"> - Any acrylic or oil based paints must be washed in a series of solvent baths - All waste solvent must be disposed through a hazardous waste contractor - Spill kits are to be available at all painting locations
ACT 4	<p>During construction:</p> <ul style="list-style-type: none"> - Any concrete spillage that has occurred must be swept up - Chutes, barrels, wheelbarrows and other equipment must be rinsed in the site wash-down area - Any excess concrete is to be transported back to the supplier
ACT 5	<p>Any construction activities that generate noise are to be conducted within the following time periods:</p> <ul style="list-style-type: none"> - Monday to Saturday ... 6am to 8pm - Sunday and Public Holidays ... 6am to 8pm

10.3 Environmental monitoring

Table 5: Monitoring requirements

ID	Responsibility	Documentary Evidence
EPBC 1	-	<i>Refer to masterplan</i>
EPBC 2	-	<i>Refer to masterplan</i>
EPBC 3	D Group	Letters from ecologist / qualified fauna catcher
EPBC 4	D Group, Chase Construction	Weekly Site Inspection Checklists / Photos
EPBC 5	-	<i>Refer to masterplan</i>
EPBC 6	D Group, Chase Construction	Weed Map Vehicle Hygiene Inspection Forms Weekly Site Inspection Checklists / Photos
EPBC 7	D Group	Erosion and Sediment Control Plan Photos
EPBC 8	D Group	Weed Suppression and Containment Register
EPBC 9	D Group, Chase Construction	Erosion and Sediment Control Plans Weekly Site Inspection Checklists / Photos
EPBC 10	D Group, Chase Construction	Weekly Site Inspection Checklists / Photos
EPBC 11	D Group, Chase Construction	Weekly Site Inspection Checklists / Photos
EPBC 12	D Group, Chase Construction	Erosion and Sediment Control Plans Weekly Site Inspection Checklists / Photos
EPBC 13	D Group, Chase Construction	Weekly Site Inspection Checklists / Photos Waste Disposal Registers
ACT 1	D Group	Erosion and Sediment Control Plan Weekly Site Inspection Checklists / Photos
ACT 2	D Group, Chase Construction	Weekly Site Inspection Checklists / Photos
ACT 3	Chase Construction	Weekly Site Inspection Checklists / Photos Hazardous Waste Disposal Register
ACT 4	Chase Construction	Weekly Site Inspection Checklists / Photos
ACT 5	D Group, Chase Construction	Daily Pre-start Meeting Minutes

10.4 Corrective actions

Any identified non-conformances by construction contractors with this CEMP must be corrected by the relevant contractor and action must be taken in accordance with their respective environmental management system and subsequently reported to the Doma Group.

11 AUDIT AND REVIEW

11.1 Environmental auditing

Each month from when construction commences, an environmental audit of the active construction contractors will be undertaken to identify any non-conformances with the CEMP and to also identify any opportunities for improving environmental performance.

11.2 Environmental management plan review

This CEMP will be reviewed and updated, if necessary, when any of the following arises:

- At each three-month anniversary of this CEMP
- When there is a legitimate environmental complaint about construction activities received by the Doma Group
- When there is an environmental incident reported to DCCEEW
- When there is an environmental incident reportable to the ACT EPA

12 GLOSSARY

ACT means Australian Capital Territory

CEMP means Construction Environmental Management Plan

DCCEEW means Australian Government's Department of Climate Change, Energy, the Environment and Water

DCP 19/02 means Development Control Plan 19/02 for Blocks 4 & 5 Section 38 Campbell which was approved in October 2019

EPA means Environment Protection Authority

EPBC means Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*

NCA means Australian Government's National Capital Authority