

Kiersten Fishburn
Planning Secretary
Department of Planning and Environment
12 Darcy Street
Parramatta NSW 2150

Attn: Rob Sherry

26 July 2023

Dear Ms Fishburn

Glenwood High School (SSD-23512960): Submission of Independent Audit Report and response in accordance with Condition C38 and C39

I refer to SSD Application SSD-23512960, upgrades to Glenwood High School, approved on 25 August 2022.

In accordance, with condition C39 of the Development Consent, the following document has been submitted to the Planning Secretary for information:

- *Independent Environmental Audit 2, State Significant Development (SSD 23512960) Glenwood High School Upgrade, 6 July 2023, Rev 2*

As per the requirements of condition C38 the Department must be issued with a response from the proponent to the Independent Audit Report, therefore the following attachments are provided for your information:

- *Attachment A - Response to Independent Audit non-compliances*
- *Attachment B - Response to Independent Audit observations (Audit 2)*

In addition, in resolution of non-compliance A2_NC06 (related to Independent Audit 1 Improvement Opportunities), *Attachment C – Response to Independent Audit observations (Audit 1)*, is provided for your information.

In accordance with condition C38(c) the Independent Audit Report and response will be made publicly available on the SINSW project website within 60 days of the date of this submission.

Yours sincerely

Amit Rampal

Amit Rampal

**Project Director
School Infrastructure NSW**

Attachment A – Response to Independent Audit non-compliances

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
A2	The development may only be carried out: (a) in compliance with the conditions of this consent;	a) Non-compliance against conditions: A24, A28, A31, A32, C31, C38 (see below for specific condition findings)	See below for specific condition recommendations	See below for specific condition actions / responses	See below for specific action evidence	OPEN (see below for individual action status)
A24	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (ix) audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report;	A24(a)(ix): The report for Audit 1 has been uploaded. The Applicants response to Audit 1 findings has not.	Ensure the Applicants response to Audit 1 findings, addressing recommendations and improvement opportunities, is uploaded to the project website.	Noted and acknowledged. This was due to an oversight from the project team. This has now been rectified and the response to Audit 1 has been uploaded on the GHS website on 30/06/23.	https://www.schoolinfrastructure.nsw.gov.au/projects/glenwood-high-school-upgrade.html#category-information-packs	CLOSED
A28	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	A28: The Response to Independent Audit non-compliances (Audit 1) was provided to the PS as the non-compliance notification under A28, stating that the non-compliances were identified on the 30/01/2023 with the submission of the final report for Audit 1, however the Applicant was made aware of the non-compliances during the Closing Meeting of Audit 1 over 7 weeks earlier.	Ensure a process is implemented so that non-compliance notifications are issued to the Planning Secretary within 7 days of becoming aware of the non-compliance.	Noted and acknowledged. For IEA 1, the project team erroneously interpreted the start of the 7-day period to be the issue of the final IEA report. The requirement is well understood, and following the IEA2 site audit, letter SSD-23512960-PA-13 has been issued on the 13/06/23 to the PS within the 7-day requirement.	SSD-23512960-PA-13 has been issued to the PS within the 7-day requirement.	CLOSED

Condition ID	Compliance Requirement	Audit finding	Audit Recommendation	Proponent's Proposed Action/Action Taken/Response	Evidence	Due Date/Status
A31	Within three months of: (b) the submission of an Independent Audit under condition C35 or C36; the strategies, plans and programs required under this consent must be reviewed, and the Planning Secretary and the Certifier must be notified in writing that a review is being carried out.	A31(b): No notification to the PS and Certifier that a review of strategies, plans and programs required under this consent was conducted.	Ensure a process is implemented so that the Planning Secretary and Certifier are notified should a review of strategies, plans and programs be triggered under condition A31.	Noted and acknowledged. Reminders in place moving forward. Following Audit 2, under condition A31 and A32, the CEMP and sub-plans are to be reviewed and updated as required. Notification of review will be issued to the PS following submission of this audit and any updates will be submitted to the PS and/or the Certifier accordingly.	Evidence can be provided of completion of action, as required.	OPEN
A32	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawings required under this consent must be revised, to the satisfaction of the Planning Secretary or Certifier (where previously approved by the Certifier). Where revisions are required, the revised document must be submitted to the Planning Secretary and / or Certifier for approval and / or information (where relevant) within six weeks of the review.	A32: The following revisions of management plans have not been issued to the PS or Certifier for information: • CEMP 17/12/2022 • CTMSP 15/12/2022 • CWMSP 23/01/2022	Ensure the current versions of the CEMP and subplans, and any future revisions, are submitted to the Planning Secretary and Certifier within 6 weeks of the review.	Noted and acknowledged. This was due to an oversight by the project team, where the necessary updates were made to the relevant plans but were not uploaded on the website and issued to the PS and Certifier. Noted and acknowledged. Following Audit 2, under condition A31 and A32, the CEMP and sub-plans are to be reviewed and updated as required. Updates will be submitted to the PS and/or the Certifier, as well as uploaded on the project website.	Evidence can be provided of completion of action, as required.	OPEN
C31	The Applicant must ensure that concrete waste and rinse water are not disposed of on the site and are prevented from entering any natural or artificial watercourse.	C31: The site audit identified that excess concrete had been poured onto the internal access road in the north-west area of the site to stabilise the vehicle turning bay (which is required so that vehicles can exit the site in a forward direction). The area was wet and there was deemed to be a risk of rinse water entering the watercourse. The audit deemed this a non-compliance but recognised that there are mitigating circumstances and that that pad has been put there intentionally. The audit determined that the concrete pad is necessary to maintain access (used as a hard	Ensure the concrete pad in the driveway turning area and adjacent soil are removed and disposed of appropriately prior to landscaping of the area. Maintain evidence (waste docket, include clearance certificate, photos) and provide for Audit 3.	As noted in IAPAR #02, RCC have endeavoured to mitigate the substantial rain events plaguing the project to ensure compliance with consent conditions and EPA requirements for sediment control. RCC will ensure the concrete pad in the driveway turning area and adjacent soil are removed and disposed of appropriately prior to landscaping of the area. Landscaping will be installed as per approved designs following the removal of the concrete pad.	Project team will monitor. This is in the builder's construction program.	OPEN

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		standing for turning vehicles) compliant with other and can be removed prior to landscaping. Other methods had been used prior but had failed to work and this solution was seen as the least consequential.				
C38	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Applicant must: (a) review and respond to each Independent Audit Report prepared under condition C35 of this consent, or condition C36 where notice is given by the Planning Secretary; (c) make each Independent Audit Report, and response to it, publicly available within 60 days of submission to the Planning Secretary, unless otherwise agree by the Planning Secretary.	C38(a): The Applicant's response to the Audit report only addressed the non-compliances and omit responses to the Improvement Opportunities identified in Audit 1. C38(c) [and A24(a)ix]: The report for Audit 1 has been uploaded on the public website but the Applicant's response has not.	Ensure the Applicants response to Audit 1 improvement opportunities is provided to the Planning Secretary. Ensure the Applicants response to Audit 1 recommendations and improvement opportunities, is uploaded to the project website.	Noted and acknowledged. This was due to an oversight from the project team. The team has ensured that the Improvement Opportunities responses from IEA 1 and IEA 2 are included in this letter (see Attachments C & B respectively), as well as non-compliance responses, in the formal response to Audit Report 2 to satisfy C38(a) Noted and acknowledged. This was due to an oversight from the project team. Response to Audit 1 has been uploaded on the GHS website on 30/06/23. And the team will ensure that this response for Audit 2 (including Response to Audit 1 Observations) is uploaded to the website within 60 days of submission.	Evidence of submission to PS in accordance with this letter. https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-information-packs	CLOSED CLOSED



Attachment B – Response to Independent Audit observations (IEA 2)

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
A24	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: ... (vi) a summary of the current stage and progress of the development;	A2_IO1: No project updates have been uploaded since Audit 1 (September 2022 being the last). Aim to provide project updates on the project website at least every 4 months.	Complete – June 2023 update uploaded on website. Project team will ensure other updates are uploaded, as required.	https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-project-updates	CLOSED
C20	For the duration of the construction works: (d) if access to the area within any protective barrier is required during the works, it must be carried out under the supervision of a qualified arborist. Alternative tree protection measures must be installed, as required. The removal of tree protection measures, following completion of the works, must be carried out under the supervision of a qualified arborist and must avoid both direct mechanical injury to the structure of the tree and soil compaction within the canopy or the limit of the former protective fencing, whichever is the greater.	A2_IO2: The Tree Removal Statement (McArdle Arboricultural, 23/01/2023) recommended that Tree 129 be replenished with two (2) <i>Eucalyptus tereticornis</i> (Forest Red Gum). Ensure this is included as an addendum to the BDAR, if not already included, and identify responsibility for implementation.	RCC will provide the recommendations from the Project Arborist (McArdle Arboricultural) to Eco Logical Australia Pty Ltd by way of amendment to the Glenwood High School Arboricultural Impact Assessment.	To be captured as part of the As-Built scope of works for Landscaping works	OPEN
N/A - CEMP	CEMP implementation	A2_IO3: Ensure all chemicals are stored in a bunded storage area and are appropriately labelled. Deliver a toolbox to ensure subcontractors are aware of the requirements for storing and handling chemicals.	Actioned	Photographic & document evidence can be made available if required	CLOSED
N/A - CSWMSP	CSWMSP implementation	A2_IO4: Clear sediment build-up around the coir log on the inlet pit along Glenwood Park Drive.	Actioned	Photographic evidence can be made available if required	CLOSED
N/A - CSWMSP	CSWMSP implementation	A2_IO5: Remove built-up sediment, replace the geofabric and repair the sediment fence on the drain in the south-west portion of the site.	Actioned	Photographic evidence can be made available if required	CLOSED
N/A - CSWMSP	CSWMSP implementation	A2_IO6: Remove the sediment build-up and replace the lining in the sediment pond.	Actioned	Photographic evidence can be made available if required	CLOSED

Attachment C – Response to Independent Audit observations (IEA 1)

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
A24	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (viii) a complaints register, updated monthly;	A1_IO01: Specify on the project webpage that the contact options can also be used for lodging a complaint. Recommended that a phone number also be provided.	Project website has been updated with clearer contact information	https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html	CLOSED
B10	No later than 48 hours before the commencement of construction, a Community Communication Strategy must be submitted to the Planning Secretary for information. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, the relevant Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development and for a minimum of 12 months following the completion of construction.	A1_IO02: Change the name of Appendix 6.9 in the CEMP to Community Communication Strategy	Actioned	CEMP (12/12/2022)	CLOSED
B10	The Community Communication Strategy must: (a) identify people to be consulted during the design and construction phases;	A1_IO03: Update the document control table in the CCS with the correct date. .	Actioned	CCS (14/12/2022)	CLOSED
B10	The Community Communication Strategy must: (b) include a requirement to give notice to adjacent properties and Council at least 5 days prior to works commencing for approved works under this consent which are located within Council controlled lands;	A1_IO04: Include the requirement in CCS to notify adjacent properties and Council at least 5 days prior to works commencing which are located within Council controlled lands. If no works are to be conducted on Council controlled lands, include a statement to this effect in the CCS.	All notifications under the Consent Conditions were provided within the specified timeframes. All works were contained within the Site Boundary during IEA 01	CEMP (26/06/2023)	CLOSED
B10	The Community Communication Strategy must: (d) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development;	A1_IO05: Specify that the formation of community-based forum is not required under the consent in the CEMP	Actioned.	CEMP (26/06/2023)	CLOSED
B15	Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must	A1_IO06: Update the CEMP Revision Register with the correct information regarding the revisions.	Actioned.	CEMP (26/06/2023)	CLOSED

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
	include, but not be limited to, the following:				
B16	The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following: (b) be prepared in consultation with Council and TfNSW;	A1_IO07: Update the compliance table in Section 2.2 of the CTPMSP to reference Section 2.5 not 2.3. In section 2.5 confirm the revision and date of the CTMSP provided initially for consultation	Actioned.	CEMP (26/06/2023)	CLOSED
B17	The Construction Noise and Vibration Management Sub-Plan must address, but not be limited to, the following: (b) describe procedures for achieving the noise management levels in EPA's Interim Construction Noise Guideline (DECC, 2009);	A1_IO08: Update B17b) in the compliance table in section 1.2 of the CNVMSP to reference section 6.1 not 4.1.	Actioned.	CEMP (26/06/2023)	CLOSED
B20	The Construction Flood Emergency Management Sub-Plan must address, but not be limited to, the following:	A1_IO09: Update the name of Appendix 6.11 of the CEMP to FERMSP	Actioned	CEMP (12/12/2022)	CLOSED
B21	Prior to the commencement of construction, the Biodiversity Management Sub-Plan must address, but not be limited to, the following:	A1_IO10: Update the name of Appendix 6.10 of the CEMP to BMSP	Actioned	CEMP (12/12/2022)	CLOSED
B22	A Driver Code of Conduct must be prepared and communicated by the Applicant to heavy vehicle drivers and must address the following:	A1_IO11: Include details in the CTPMSP on how the Driver Code of Conduct will be communicated.	Actioned.	CEMP (26/06/2023)	CLOSED
C17	Vibratory compactors must not be used closer than 30 metres from residential buildings unless vibration monitoring confirms compliance with the vibration criteria specified in condition C16.	A1_IO12: Include that there are no residential buildings within 30m of site boundary in the CNVMSP.	Actioned.	CEMP (26/06/2023)	CLOSED
C23	The Applicant must: (a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site;	A1_IO13: Include that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site.	Actioned.	CEMP (26/06/2023)	CLOSED
C32	The Applicant must record the quantities of each waste type generated during construction and the proposed reuse, recycling and disposal locations for the duration of construction.	A1_IO14: Update WMSP Section 1 Table 2 to reference Section 6.	Actioned.	CEMP (26/06/2023)	CLOSED
N/A - CSWMSP	CSWMSP implementation	A1_IO15: Repair the sediment fence that is in poor repair to the south of the site office.	Actioned	Photographs provided following Audit 1	CLOSED
N/A - BMSP	BMSP implementation	A1_IO16: Additional No Go Zone signage on the exclusion fencing for the Cumberland Plain Woodland was requested.	Actioned	Photographs provided following Audit 1	CLOSED

Condition ID	Compliance Requirement	Audit Observation/Opportunity for Improvement	Proponent's Proposed or Completed Action or reason for not implementing measures/changes	Evidence	Due Date/Status
N/A - CEMP	CEMP implementation	A1_IO17: Greater clarity could be provided in the CEMP regarding the interfaces between the key project stakeholders, that is, SINSW, Jacobs, and RCC particularly in relation to incident and complaint management and reporting.	Actioned.	CEMP (26/06/2023)	CLOSED
N/A - CEMP	CEMP implementation	A1_IO18: Update Section 4.3 of the CEMP to include the correct legislation.	Actioned.	CEMP (26/06/2023)	CLOSED
N/A - CCS	CCS implementation	A1_IO19: Promote improved communications by DE/SINSW with the Jacobs and RCC project team to: <ul style="list-style-type: none"> Notify the project team of the complaint in a timely manner so that CCS performance criteria can be met. Ensure that sufficient information regarding the exact date, time and location of the complaint is provided to enable effective incident investigation.	Acknowledged. Evidence provided and complaints register includes details	Register updated. https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports	CLOSED
N/A - CCS	CCS implementation	A1_IO20: DE/SINSW to provide greater clarity on the project webpage and project management plans (CCS and CEMP) regarding the options for raising a complaint (email, mail, telephone).	Improved information on project webpage.	https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports	CLOSED
N/A - CEMP	CEMP implementation	A1_IO21: Include details of the conditions of consent relating to incident notification and reporting, including required time frames and facilitation with project stakeholders (Jacobs and SINSW), in the CEMP	Actioned.	CEMP (26/06/2023)	CLOSED

