

Independent Environmental Audit 1

***State Significant Development (SSD 23512960)
Glenwood High School Upgrade***

30 January 2023

Independent Environmental Audit

Glenwood High School Upgrade

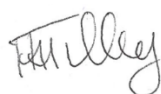
30/01/2023



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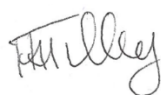


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Version Control (optional)

Revision No.	Date Issued	Description	Author	Approver
Rev 1	19/01/2023	Draft Audit report issued to client for review	Denise Day Kristen Branks	Heather Tilley
Rev 2	30/01/2023	Updated based on client comments and provision of additional evidence	Denise Day	Heather Tilley

Contents

1	Introduction.....	1
1.1	Project Background.....	1
1.1.1	Project Location.....	1
1.1.2	Project Staging.....	2
1.1.3	Independent Audit Requirements.....	2
1.2	Audit Team.....	3
1.3	Audit Objectives.....	4
1.4	Audit Scope.....	4
1.5	Audit Period.....	5
2	Audit Methodology.....	6
2.1	Selection and Endorsement of the Audit Team.....	6
2.2	Independent Audit Scope Development.....	6
2.2.1	Consultation.....	6
2.3	Audit Process.....	7
2.3.1	Opening Meeting.....	7
2.3.2	Site Interviews.....	7
2.3.3	Site Inspection.....	8
2.3.4	Closing Meeting.....	8
2.4	Compliance status descriptors.....	8
3	Audit Findings.....	10
3.1	Approval and Document List.....	10
3.1.1	Other Approvals.....	10
3.2	Compliance Performance.....	10
3.3	Summary of agency notices, orders, penalty notices or prosecutions.....	11
3.4	Non-compliances.....	11
3.5	Previous Audit Recommendations.....	12
3.6	EMP, Sub-plans and Compliance Documents.....	13
3.7	Environmental Management System.....	15
3.8	Environmental Performance.....	18
3.9	Consultation Outcomes.....	19
3.10	Complaints.....	20
3.11	Incidents.....	23
3.12	Actual versus Predicted Environmental Impacts.....	23
3.12.1	Project Boundary.....	24
3.13	Site Inspection.....	24

3.14	Site Interviews	25
3.15	Previous Annual Review or Compliance Report Recommendations	25
3.16	Improvement Opportunities	25
4	Recommendations	27
4.1	Non-Compliance Recommendations	27
4.2	Improvement Opportunities	28
4.3	Key Strengths	28
5	Conclusion	29

APPENDICES

APPENDIX A	Letter of Approval of Independent Auditor
APPENDIX B	Evidence of Consultation
APPENDIX C	Audit Agenda
APPENDIX D	Site Visit Photographs
APPENDIX E	Audit Table
APPENDIX F	Audit Declaration Form

Tables

Table 1: SSD 23512960 conditions of consent relating to Independent Environmental Audits	3
Table 2: Summary of consultation	6
Table 3: Interview personnel	7
Table 4: Compliance status descriptors	8
Table 5: Key documents	10
Table 6: Compliance findings	11
Table 7: Details of non-compliances against SSD 9809	11
Table 8: Assessment of the implementation of management plan requirements	13
Table 9: Review of the project EMS	15
Table 10: Environmental performance	18
Table 11: Tree protection and the management of the Cumberland Plain Woodland.	19
Table 12: Details of complaints	22
Table 13: Actual verses predicted environmental impacts for construction	23
Table 14: Opportunities for improvement	25
Table 15: Non-compliance recommendations	27

Figures

Figure 1: Project location	2
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Acronyms and Abbreviations

Acronym	Definition
BMSP	Biodiversity Management Sub-Plan
BCC	Blacktown City Council
CEMP	Construction Environmental Management Plan
CNVMS	Construction Noise and Vibration Management Sub-Plan
CSWMS	Construction Soil and Water Management Sub-Plan
CTPMS	Construction Traffic and Pedestrian Management Sub-Plan
CWMS	Construction Waste Management Sub-Plan
DE	Department of Education
DPE	Department of Planning and Environment
EMP	Environmental Management Plan
EMS	Environmental Management System
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
FERS	Flood Emergency Response Sub-Plan
IAPAR	Independent Audit Post Approval Requirements (DPIE, May 2020)
PMP	Project Management Plan (RCC)
PPE	Personal Protective Equipment
PTS	Permanent teaching spaces
RCC	Richard Crookes Constructions
SINSW	School Infrastructure New South Wales
SSD	State Significant Development
SWMS	Safe work method statement
TfNSW	Transport for NSW
TPZ	Tree protection zone

Executive Summary

Development consent for State Significant Development SSD 23512960 (25 August 2022) requires that independent audits of the development be carried out in accordance with conditions C35 to C40.

This independent audit report satisfies these conditions, and has been conducted in accordance with:

- *Independent Audit Post Approval Requirements (IAPAR)* (DPIE, May 2020)
- The processes and practice procedures identified in AS/NZS ISO 19011:2014 - *Guidelines for Auditing Management Systems*.

This audit report documents the findings and outcomes of the review of compliance conducted by Arcadis (Lead Auditor – Denise Day). The audit process comprised a detailed document review, opening and closing meetings, site visit (conducted on the 15 December 2022) and post-site audit document review and follow up.

Consultation with the Department of Planning and Environment (DPE) and Blacktown City Council (BCC) was conducted in order to develop the scope for the audit. The consultation focus and findings are as follows:

- DPE:
 - NSW Planning's Independent Audit Post Approval Requirements (Conditions C35-C39): this audit meets these requirements.
 - Tree protection and the project's management of the Cumberland Plain Woodland: Overall, the management of tree protection and the Cumberland Plain Woodland has been in compliance with the consent, EIS documentation and management plans, and the required outcomes have been achieved.
- BCC: no response.

It was found that the site was generally compliant, and the project was generally being managed in accordance with the requirements of the SSD 23512960 conditions of consent. Of the 174 conditions, the audit identified the following:

- 71 compliant
- Five non-compliant
- 98 not triggered.

Non-compliances were identified in respect of the following conditions

- A2: not complying with all written directions of the Planning Secretary (NC1)
- A24: not uploading/updating information on the project webpage in accordance with the requirements (NC2)
- A26: failing to notify the Planning Secretary immediately after becoming aware of an incident (NC3)
- B18: not including confirmation of the contamination status of the development areas of the site in the Construction Waste Management Sub-Plan (CWMSP) (NC4 -closed)
- C36: failure to obtain approval from the Planning Secretary for the proposed independent auditor prior to the commencement of an Independent Audit (NC5 - closed). Adequate evidence has subsequently been provided to close this out.

Of the 21 improvement opportunities presented, most relate to minor omissions in site environmental management plans (EMP) to ensure conditions of consent requirements are met, while only a couple relate to inadequate implementation of requirements stated in the plans.

The audit identified an effective Environmental Management System (EMS), risk management, and monitoring and inspections. Of note is the positive response to addressing improvement opportunities.

The audit concludes that the Glenwood High School upgrade project is generally being undertaken in compliance with the requirements of SSD 23512960.

1 Introduction

1.1 Project Background

The proposed upgrades at the new Glenwood High School (GHS) include the formalisation of learning spaces in a new three (3) storey building that will replace eighteen (18) existing demountable classrooms on site. The upgrade will cater to a capacity of approximately 1,820 students. It will also include the addition of a new single story performing arts centre and refurbishments of existing spaces.

Delivery of the project will include:

- Replacement of existing temporary teaching spaces (TTS) (18) with permanent spaces
- Removal of all demountables
- Addition of 43 GLS, five Technical spaces (Workshop and labs)
- Functionally upgrade existing teaching spaces to future focused teaching spaces
- Upgrade of staff and administration facilities
- Conservation of open space at the school.

Schools Infrastructure NSW (SINSW) awarded a design and construct contract to Richard Crookes Constructions (RCC) in March 2022.

Early works are currently being conducted under Development Application DA-21-02007 issued by Blacktown City Council under the *Environmental Planning and Assessment Act 1979* on the 27 May 2022. Works include bulk earthworks, removal of three trees, utility and footings within the proposed earthworks area and the existing stormwater pipes and installation of the proposed new stormwater line.

The delivery of the main project works is under State Significant Development (SSD) 23512960 approved on the 25 August 2022.

Construction commenced on the 5 October 2022 and is expected to be completed in July 2023.

1.1.1 Project Location

Glenwood High School (GHS) is located at 85 Forman Avenue, Glenwood. The site is legally described as Lot 5227 in Deposited Plan 868693, and covers a total area of 60,790 m². The Project location is shown in Figure 1.

GHS was established via a Public Private Partnership (PPP) in 2004. The school is part of a suite of schools delivered under the NSW Government's 'New Schools I' PPP program. Axiom Education 1 Pty Ltd, a private consortium, financed, designed, and constructed the school. It provides ongoing cleaning, maintenance and security services.



Figure 1: Project location

1.1.2 Project Staging

The delivery of the works is not being staged.

1.1.3 Independent Audit Requirements

This Independent Environmental Audit (IEA) has been conducted to meet the requirements in conditions of consent C35 to C40 of SSD 23512960, which are presented in Table 1.

In accordance with the *Independent Audit Post Approval Requirements* (DPIE, May 2020), two IEAs are to be delivered during construction; the first within 12 weeks following the commencement of construction (conducted on the 15 December 2022) and the second no later than six months from the date of the initial construction IEA (estimated to be conducted in the week starting 27 March 2023).

An operational IEA will be delivered within 26 weeks following the commencement of operation (anticipated for January 2024).

Table 1: SSD 23512960 conditions of consent relating to Independent Environmental Audits

Condition	Requirement
C35	Independent Audits of the development must be conducted and carried out in accordance with the <i>Independent Audit Post Approval Requirements (2020)</i> .
C36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.
C37	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified in the <i>Independent Audit Post Approval Requirements (2020)</i> , upon giving at least 4 week's notice (or timing) to the Applicant of the date upon which the audit must be commenced.
C38	In accordance with the specific requirements in the <i>Independent Audit Post Approval Requirements (2020)</i> , the Applicant must: <ul style="list-style-type: none"> (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; (b) submit the response to the Planning Secretary; and (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.
C39	Independent Audit Reports and the applicant/proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the <i>Independent Audit Post Approval Requirements (2020)</i> unless otherwise agreed by the Planning Secretary.
C40	Notwithstanding the requirements of the <i>Independent Audit Post Approval Requirements (2020)</i> , the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.

1.2 Audit Team

Denise Day – Lead Auditor

Qualifications

- Bachelor of Science (Honours), Post Graduate Diploma in Environmental Impact Assessment
- Environmental Auditor (Exemplar Global Certificate No: 14760). Scopes:
 - Environmental Management Audit

Denise has 22 years audit experience conducting audits across a diversity of sectors with varying focus and scope, including environmental management systems, environmental performance, compliance/ regulatory, governance, and sustainability audits and due diligence assessments.

Kristen Branks – Support Auditor

Qualifications

- Master of Science, Environmental Earth Science and Bachelor of Science
- ISO 14001 audit training.

Kristen is an Environmental Consultant at Arcadis with over four years' experience in environmental management and impact assessment for waste, infrastructure, and energy sectors in NSW. She also has experience in waste advisory and management and has assisted in collection and data analysis with regards of waste generation.

1.3 Audit Objectives

The objectives of this independent audit were to assess:

- Compliance with the SSD 23512960 conditions of consent and to identify recommendations for each non-compliance raised
- Implementation of site Environmental Management Plan (EMP) and Sub-plans
- The environmental performance of the development
- The appropriateness and effectiveness of the project's environmental management systems (EMS)
- The adequacy of the CEMP and Sub-plans and identify opportunities for improvement.

1.4 Audit Scope

The scope of this Independent Audit includes:

1. An assessment of compliance with:
 - a. All conditions of consent applicable to the phase of the development that is being audited
 - b. All post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of the CEMP and Sub-plans
 - c. All environmental licences and approvals applicable to the development excluding environment protection licences issued under the *Protection of the Environment Operations Act 1997*.
2. A review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - a. Actual impacts compared to predicted impacts documented in the environmental impact assessment (EIS)
 - b. The physical extent of the development in comparison with the approved boundary
 - c. Incidents, non-compliances and complaints that occurred or were made during the audit period
 - d. The performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit
 - e. Feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee, on the environmental performance of the project during the audit period (refer to Section 2.2 for details)

3. The status of implementation of previous Independent Audit findings, recommendations and actions (Note: This requirement is not applicable as this is the first audit for the project)
4. A high-level review of the project EMS, including assessment of third-party certification, the type, nature and scope of the systems having regard to the nature and scale of the development, the implementation of the systems, and any key deficiencies identified
5. A high-level assessment of whether Construction Environmental Management Plans (CEMP and Sub-plans are adequate
6. Any other matters considered relevant, taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

1.5 Audit Period

This first Independent Audit covers the 12-week period from start of construction on the 5 October 2022 to the date of site audit on the 15 December 2022; noting that the delivery of some conditions of consent required actions prior to the start of construction.

2 Audit Methodology

This independent audit was conducted in accordance with the audit methodology and audit report requirements detailed in *Independent Audit Post Approval Requirements* (IAPAR) (DPIE, May 2020). As relevant, the audit methodology will also meet the requirements of AS/NZS ISO 19011:2019 *Guidelines for auditing management systems*.

2.1 Selection and Endorsement of the Audit Team

Endorsement of the independent audit team was provided to SINSW from the Planning Secretary Department of Planning and Environment (DPE) on 19 November 2022. The letter of approval is provided in Appendix A.

2.2 Independent Audit Scope Development

IAPAR (DPIE, May 2020) sets out the minimum requirements to be met when undertaking independent audits for SSD approvals. The minimum requirements are detailed in Section 1.4.

2.2.1 Consultation

Further development of the scope of the audit was considered through agency consultation, and review of the Response to Submissions (RtS) Report and Request for Additional Information (RRAI).

Consultation was also undertaken with DPE and Blacktown City Council (BCC) to obtain input into the scope of the audit. Evidence of consultation is provided in Appendix B. A summary of consultation is presented in Table 2.

Table 2: Summary of consultation

Agency	Contact	Dates	Comments
DPE	DPE PSVC Compliance Mailbox Alfarid Hussain Elizabeth Williamson	07/11/2022 06/12/2022	Ensure the audit is undertaken in accordance with Conditions C35-C39 and NSW Planning's Independent Audit Post Approval Requirements. In addition to the above, please also focus on tree protection and the project's management of the Cumberland Plain Woodland. NSW Planning also requests that you contact Council, which it appears from your email that you already have.
BCC	Judith Portelli	16/11/2022 12/12/2022	No comments.

2.3 Audit Process

2.3.1 Opening Meeting

An opening meeting was conducted on the 15 December 2022 with the purpose of discussing:

- The audit purpose, objectives and scope
- The resources required
- Methodology to be applied in conducting the audit
- Overview of the project and current status of the works
- Site safety requirements, including induction and Personal Protective Equipment (PPE).

A copy of the meeting agenda and register of attendees (including their name and position title) for the opening meeting is presented in Appendix C.

2.3.2 Site Interviews

Site personnel and their position title interviewed for this audit are in Table 3. Interviews was conducted during the site visit on the 15 December 2022.

Table 3: Interview personnel

Name	Position	Company
Joel Couburgh	Senior Project Engineer	RCC
Joshua Stubbs	Project Engineer	RCC
Nicholas Murphy	WHSE Advisor	RCC
Marcus Kraefft	Project Manager	Jacobs
Vipal Patel	Support Project Manager	Jacobs

The interviews covered the following information:

- The overarching EMS for the project, including the management of documentation such as the waste register, training and induction records, site inspections, chemical inventory
- The review of records (training, waste, inspections) to ensure they met the requirements of the conditions of consent and CEMP and Sub-plans
- Construction activities, including site deliveries and traffic control, waste and chemical management, inspections and corrective actions
- The implementation and maintenance of erosion and sediment controls (ERSED) around the project site, including any changes
- The stormwater management system, including the status of implementation
- Compliance with biodiversity management, including the management of remaining trees and Vegetation Zone 1 (Cumberland Plain Woodland).

2.3.3 Site Inspection

The site inspection was undertaken on the 15 December 2022 by Denise Day (Lead Auditor).

All areas visited during the site inspection included:

- Site perimeter, in particular along Glenwood Park Drive
- Site offices
- Construction areas
- Site entrance.

Photographs taken during the site inspections are presented in Appendix D.

2.3.4 Closing Meeting

The closing meeting was conducted on the 15 December 2022 with the purpose of:

- Presenting preliminary audit findings
- Discussing recommendations
- Confirming any post-audit actions, including requests for further documentation.

A copy of the meeting agenda and register of attendees (including their name and position title) for the closing meeting is presented in Appendix C.

2.4 Compliance status descriptors

Evidence collated through documentation and during the site inspection and interviews was evaluated to assess compliance with the relevant conditions of consent. Any information gaps identified were addressed through requests for further data, or additional interviews.

The evidence used to verify the compliance status descriptor chosen with respect to each condition of consent is documented in the Audit Table (Appendix E). The environmental significance of non-compliance has also been assessed based on the potential risk.

Minor non-compliances (e.g. sediment fence repairs, omissions in site management plans) were discussed in the closing meeting and corrective actions identified. Where evidence was subsequently provided to the satisfaction of the auditor to verify close-out of actions and/or updates to plans and ensure ongoing compliance, this is also included in the Audit Table.

The compliance status descriptors and definitions that have been applied to assess compliance requirements in the Audit Table are presented in Table 4.

Table 4: Compliance status descriptors

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

Status	Description
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

When evaluating post-approval documents (such as the CEMP and Sub-plans), the following was assessed:

- Have they been developed in accordance with the conditions of consent and approvals applicable to the development, and is the content adequate
- Have comments from DPE been adequately addressed
- Have they been implemented in accordance with the conditions of consent for the development.

The adequacy of documents was determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document
- Whether there are any opportunities for improvement.

3 Audit Findings

3.1 Approval and Document List

A Request for Information (RFI) Register was prepared based on a review of the SSD 23512960 conditions of consent and was issued to RCC and Jacobs on the 16 November 2022.

The key documents reviewed for the audit, and the relevant approval documents, are provided in Table 5.

Table 5: Key documents

Document name	Date
Environmental Impact Statement Glenwood High School (EIS) (Architectus,)	14/11/2021
Upgrades to Glenwood High School (SSD-23512960) Response to Request for Further Information (Architectus)	21/04/2022, 24/06/2022, 09/06/2022, 20/06/2022
Submissions Report (SSD-23512960) Glenwood High School (RtS) (Architectus)	18/02/2022
BCA Crown Certificate (Blackett Maguire + Goldsmith,)	04/10/2022
Community Communication Strategy (CCS) Glenwood High School Upgrade (Version 1)	13/09/22, 14/12/2022
Construction Environmental Management Plan (CEMP)	16/09/2022, 12/12/2022
Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) (TTW)	21/09/2022, 01/11/2022
Construction Noise and Vibration Management Sub-Plan (CNVMSP) (PWNA)	08/09/2022, 15/12/2022
Construction Waste Management Sub-Plan (CWMSP) (EcCEll)	26/08/2022
Construction Soil and Water Management Sub-Plan (CSWMSP) (SCP)	12/09/2022
Flood Emergency Management Sub-Plan (FEMSP) (SCP)	30/08/2022
Biodiversity Management Plan (BMP) Glenwood High School (Kleinfelder)	20/04/2022
Glenwood High School Biodiversity Development Assessment Report (BDAR) (Kleinfelder)	10/11/2021

3.1.1 Other Approvals

Early works were conducted under Development Application DA-21-02007 issued by Blacktown City Council on the 27 May 2022 under the *Environmental Planning and Assessment Act 1979*. These works included bulk earthworks, removal of three trees, utility and footings within the proposed earthworks area and the existing stormwater pipes and new stormwater line.

No other approvals are relevant to the site.

3.2 Compliance Performance

Compliance performance as assessed against each of the conditions of consent of SSD 23512960 is presented in detail in Appendix E. The evidence (documentation, interviews and site visit observations) assessed to determine compliance, along with a summary of the finding, is presented. Photographs taken during the site visit as evidence to support the findings is presented in Appendix D.

A summary of compliance findings against the SSD 23512960 conditions of consent is presented in the table below.

Table 6: Compliance findings

Consent Schedule	Number of Conditions	Compliant	Non-compliant	Not triggered
Part A – Administrative Conditions	32	14	3	15
Part B - Prior To Commencement of Construction	36	19	2	15
Part C- During Construction	43	28	-	15
Part D - Prior To Commencement of Operation	32	-	-	32
Part E – Post Occupation	12	-	-	12
Appendix 1	15	6	-	9
Appendix 2	4	4	-	-
Total	174	71	5	98

3.3 Summary of agency notices, orders, penalty notices or prosecutions

No agency notices, orders, penalty notices or prosecutions have been issued in relation to the development.

3.4 Non-compliances

As presented in Table 6, of the 174 conditions of consent, a total of five unique non-compliances were identified, each of which has been allocated a unique identifier as presented in Table 7. Of these, two non-compliance have been closed out, with evidence having been provided to the satisfaction of the auditor, while three non-compliances remain outstanding.

Deficiencies and improvement opportunities in the CEMP and sub-plans were discussed during the closing meeting of the site visit. Details of any non-compliances that have been closed out, with evidence provided to the satisfaction of the auditor are presented in Appendix .E.

Table 7: Details of non-compliances against SSD 9809

#	CoC	Requirement	Audit Finding	Current status
NC1	A2	The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary;	a) Non-compliance against conditions: A2, A24b), A26, A2b), A24, A26, B17, B18, C36 b) Written direction SSD-23512960-PA-3: review of Attachment A responses and findings from this audit identified that feedback on the following conditions has not been addressed: B17g) and B18c).	Open

#	CoC	Requirement	Audit Finding	Current status
NC2	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; (b) keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	a)(viii): The Complaints register had not been uploaded when first accessed on the 10/11/2022, despite a complaint having been made on the 10/10/2022. Inaccurate dates complaints register (see Section 3.10). The noise complaint from the 10/10/2022 was not included in the Complaints Register when it was accessed on the 06/12/2022. b) As above.	Open
NC3	A26	The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	RDD correspondence indicates that Jacobs was notified of the incident on the 06/10/2022, six days before the Incident Notification was lodged with DPE on the 12/10/2022. This is not deemed 'immediate'.	Open
NC4	B18	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following: c) confirmation of the contamination status of the development areas of the site based on the validation results.	Section 1 Table 2 references that the contamination status is provided in Douglas Partners Glenwood High School November 2021 Project Number 94626.00 (EIS) only. This information is provided on page 24-25 of the Douglas Partners report and should be included in the CWMSP for clarity. This was also raised in DPE Correspondence: SSD-23512960-PA-3, Amended Architectural and Landscape Plans, Condition B3 Request for Additional Information, Attachment A dated 27/096/2022.	Closed
NC5	C36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Approval for the independent auditor was not submitted until 17/11/2022 and approved on the 19/11/2022, after commencement of the IEA.	Closed – evidence sighted

3.5 Previous Audit Recommendations

No previous audits have been completed for the project.

3.6 EMP, Sub-plans and Compliance Documents

The environmental management plans reviewed for the audit included:

- Community Communication Strategy (CCS) (Condition B10)
- Construction Environmental Management Plan (CEMP) (Condition B15), including the Unexpected Contamination and Heritage Finds Protocol
- Construction Traffic and Pedestrian Management Sub Plan (CTPMSP) (Condition B16), including the Driver Code of Conduct (Condition B22)
- Construction Noise and Vibration Management Sub Plan (CNVMSP) (Condition B17)
- Construction Waste Management Sub Plan (CWMSMP) (Condition B18)
- Construction Soil and Water Management Sub Plan (CSWMSP) (Condition B19)
- Flood Emergency Response Sub Plan (FERMP) (Condition B20)
- Biodiversity Management Sub Plan - Update (BMSP) (Condition B21).

In relation to compliance with the conditions of consent for the above plans, a number of minor non-compliances, generally in relation to information omissions, as discussed in Section 3.4 were identified. The relevant plans have subsequently been reviewed and updated, and all non-compliances except two were closed out to the satisfaction of the auditor.

In addition to assessing the compliance of the plans with the relevant conditions of consent, the plan review included the identification of the following:

1. The mitigation actions to be implemented to manage project risks and impacts
2. Any must/ shall/ will statements, as these present statements of commitment for implementing a process or undertaking an activity
3. Any commitments form the Response to Submissions.

Identified mitigation actions and statements of were verified during the site inspection, interviews and review of the document management system. A summary of the findings is presented in Table 8.

Table 8: Assessment of the implementation of management plan requirements

Plan	Audit Finding	Improvement Opportunity
CCS	Complaints have not been managed in accordance with the timeframes specified. The fact that complaints are rarely lodged through the SINSW project webpage suggests that this option is not clear to the public. Refer to Section 3.10 for further detail.	<p>IO19: Promote improved communications by DE/SINSW with the Jacobs and RCC project team to:</p> <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. <p>IO20: DE/SINSW to provide greater clarity on the project webpage and</p>

Plan	Audit Finding	Improvement Opportunity
		project management plans (CCS and CEMP) regarding the options for raising a complaint (email, mail, telephone).
CEMP	<p>In general, the CEMP is being implemented in accordance with stated requirements, including mitigation actions, induction and training, inspections and monitoring, reviews and record keeping. The Unexpected Finds Protocol in the initial version of the CEMP provided was poorly drafted, inconsistent and inaccurate and has subsequently been rewritten to the satisfaction of the auditor.</p> <p>Environmental inspections, induction and training, emergency response testing and chemical management have all been implemented in accordance with the CEMP.</p>	None
CTPMSP	<p>Implemented in accordance with stated requirements, including mitigation actions.</p> <p>A traffic controller was observed onsite during the site audit, and interviews identified that the controller will be onsite fulltime daily during construction work hours. Site access is from Glenwood Park Drive, with a turning bay being provided onsite so the vehicles can access in a forward direction.</p> <p>Monitoring of worker parking is the responsibility of the RCC team and regular inspections are conducted in adjacent streets. Daily reminders are issued in the pre-start meetings. Specific instructions were provided regarding permissible parking areas when attending the site audit.</p> <p>No vehicles were observed to be entering or leaving the site during the site audit. 5km speed limit signage was observed during the site visit. A copy of the Drivers Code of Conduct is kept at the site entrance.</p>	None
CNVMSP	<p>One noise complaint prior to the start of construction under the SSD. Unable to determine if the site was the source of the noise. Refer to Section 3.10.</p> <p>No noise monitoring as permissible noise levels have not been exceeded and are not anticipated to be exceeded. The operation of the concrete boom pump will occur outside of the boundary for sensitive areas.</p> <p>Maintenance of plant is managed through HammerTech (servicing spreadsheet sighted). Tyred plant is fitted with beepers.</p> <p>No vibration impacts. Piling activities are greater than 30m from receivers so monitoring and mitigation measures are not triggered.</p>	None
CWMSP	<p>All waste classifications and records are provided by the waste contractor monthly and maintained onsite (sighted). These are tracked against the predicted amounts identified in the EIS.</p> <p>No demolition waste had been removed from the site at the time of the site audit. Waste bins were observed on the site for</p>	None

Plan	Audit Finding	Improvement Opportunity
	<p>general waste and paper/cardboard recycling (Appendix D, Photo 28 and 29). The site was observed to be clear of litter.</p> <p>Excavated soil is exported from the site, with the process being managed by the civil contractor. Soil was tested prior to export, with records being maintained in the job folder on the network drive (sighted).</p>	
CSWMSP	<p>All erosion and sediment controls identified in the Erosion and Sediment Control Plan within the site boundary were in place (Appendix D, Photo 1 to 8 and 23-27).</p> <p>One of the sediment fences south of the site office was noted to be torn and required replacing (Appendix D, Photos 5 and 6). Sediment controls were in place on the inlet pits along Glenwood Park Drive (Appendix D, Photo 1 and 3). The geofabric was being replaced on a regular basis due to the wet weather conditions.</p> <p>Water from the wheel wash is retained onsite in the sediment basin (see Appendix D, Photo 4).</p> <p>No contamination encountered during excavation; mostly ENM. One stockpile of VENM observed onsite, which was being managed appropriately given site space constraints.</p>	IO15: Repair the sediment fence that is in poor repair to the south of the site office. (Closed, as evidenced in Appendix D, Photos 40 and 41).
FERMP	Evacuation plans located around the site. Weather conditions are monitored daily.	None
BMSP	<p>All trees to be retained onsite under the Arboricultural Impact Assessment (AIA) were fenced (Appendix D, Photo 9 to 13). Although the BMSP states a 5m TPZ, most were less than this due to project design and construction constraints. TPZ signage was in place.</p> <p>Further detail of implementation of the BMSP is provided in Section 3.9.</p>	IO16: Additional No Go Zone signage on the exclusion fencing for the Cumberland Plain Woodland was requested. (Closed, as evidenced in Appendix D, Photos 34-39).

Overall, implementation of the site CEMP and Sub-plans has been in accordance with the requirements and has been effective on the basis of there being no incidents or complaints, and the findings of this audit.

3.7 Environmental Management System

In assessing the EMS for the Project, the audit considered the recommendations of the *Environmental Management Plan Guideline for Infrastructure Projects* (DPIE, April 2020), the key elements of which are identified in Table 9, along with the audit findings against each element.

Table 9: Review of the project EMS

EMS Element	Audit findings	Improvement Opportunities
Relationship to an existing environmental management system	<p>The project EMS is described in Section 4 of the CEMP. The CEMP is included within RCCs Project Management Plan (PMP).</p> <p>The CEMP and Sub Plans are supplementary documents to RCCs EMS that is certified by Global-Mark as meeting the</p>	None

EMS Element	Audit findings	Improvement Opportunities
	<p>requirements of AS/NZS ISO 14001:2016 Environmental Management Systems.</p> <p>The site CEMP and Sub-plans provides information on how environmental issues are to be managed on the project workplace. Health and safety aspects are also included, as relevant.</p>	
Environmental management structure and responsibilities	Section 4.2 of the CEMP includes clear details of roles and responsibilities of project stakeholders from the Project Manager through to external auditors.	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 complaints management and reporting.
Legal and compliance requirements	<p>The legal and compliance requirements are presented in a table in Section 4.3 of the CEMP.</p> <p>The table includes SEPP No 55 which was repealed on 1 March 2022 and incorporated into the <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>. The following NSW legislation relevant to the project are not included: <i>Heritage Act 1977</i> and <i>Biodiversity Conservation Act 2016</i>. NSW legislation is incorrectly labelled as Federal.</p>	IO18: Update Section 4.3 of the CEMP to include the correct legislation.
Training and awareness	<p>Training and awareness requirements are detailed in section 4.4 of the CEMP. RCC employees are required to complete in the RCC general induction and site-specific induction prior to attending site, and repeat the site-specific inductions and site walk over at the site. Contractors also participate in the site-specific induction and work under an approved SWMS. All staff are issued with a 'Welcome Pack' that includes copies of the CEMP and Sub Plans, Project Management Plan (PMP), induction and delivery process and the Traffic Control Plan.</p> <p>Induction and Fire Warden and First Aid training records were sighted in HammerTech.</p> <p>All project staff participate in a daily pre-start meeting (records of details and attendance sighted) and a weekly toolbox. Fire extinguisher training was delivered on the 02/12/2022. A weekly HSE meeting is held with subcontractor supervisors.</p> <p>A work methodology and review meeting is held with all workers involved in high-risk tasks which covers the hazards and controls.</p> <p>Emergency and Evacuation drills were conducted on 06/09/2022 (MEET-80821) and 07/12/2022 (MEET-96379) (Plant Collision / Environmental Scenario).</p>	None
Environmental risk assessment	The risk register is updated monthly, plus every 3 months with the PMP review or following an incident. The amended register	None

EMS Element	Audit findings	Improvement Opportunities
	is issued to site contractors for the preparation of Safe Work Method Statements	
Environmental management measures	The management measures and actions are detailed in the CEMP Appendix 6.2 Environmental Actions and Monitoring Table, which includes operational controls, corrective and preventative action.	None
Environmental monitoring and review	Monitoring of objectives is through inspections, audit (internal and external), HammerTech reporting (incidents, corrective actions, etc). No noise or vibration monitoring has been triggered.	None
Environmental inspection, audit and corrective actions	<p>Inspection includes regular daily visual inspections of work activities and weekly site inspections using a checklist customised for the project (verified in HammerTech during the site audit). Post rain events, a site walk over is conducted to assess conditions.</p> <p>The weekly inspection is conducted by RCC and a representative from other contractors working on the site. Actions arising from negative observations are assigned to the relevant subcontractor, with photographic evidence of close out being submitted through HammerTech. The priority level determines the close-out time.</p> <p>A start-up internal audit is conducted six weeks from the start of construction. Independent audits are conducted in conformance with the consent.</p>	None
Communications	<p>Communication processes, particularly between the project team and contractor and subcontractors, are deemed effective and include:</p> <ul style="list-style-type: none"> • A daily Pre-Start Meeting with is held to discuss discussed daily activities, accessibility, control compliance and requirements. Evidence of the daily pre-start meeting was evident on the site notice boards (Appendix D, Photo 21) • A number of site notice boards are located around the site office (Appendix D, Photos 20-22) • Sharing of relevant documentation via Aconnex and HammerTech. • Copy of the Drivers Code of Conduct is kept at the site entrance. <p>Communications with the community is covered in the induction.</p>	None

There is a clearly defined, appropriate and effective EMS in place for the implementation of the project. The review of files during the site visit confirmed that required documentation and records (training, induction, maintenance, inspections, corrective actions) are being appropriately maintained and managed, primarily through HammerTech.

3.8 Environmental Performance

The environmental performance against environmental aspects relevant to the Project, was assessed based on complaints, incidents, notifications and observations during the site visit on the 15 December 2022. The performance of the Project against each aspect is presented in Table 10.

Table 10: Environmental performance

Environmental Aspect	Performance Finding
Noise	<p>A noise complaint - adherence to standard working hours - was recorded on the 26/09/2022; prior to the start of construction. Refer to Section 3.10 for details). It is possible that this complaint was due to another adjacent construction site.</p> <p>Noise control measures observed during the site visit. Appropriate maintenance of plant and equipment. Work hours are in accordance with SSD 23512960.</p>
Air quality	<p>No dust or air quality complaints recorded. Appropriate maintenance of plant and equipment; no emissions noted during the site visit. Required controls are in place to manage dust, and monitoring is in place to implement additional measures (e.g. stop work) as required. A watercart was observed operating on the site during the site visit.</p>
Water	<p>Site surface water is being managed in accordance with approved plans. ERSED control measures are to be implemented on-site to ensure that and site run-off is appropriately managed for sediments, in accordance with BCC requirements.</p>
Land (erosion and sediment control)	<p>ERSED controls are in place and are generally being maintained (minor non-compliances observed). ERSED controls are performing to control surface erosion and discharges from site within acceptable limits.</p> <p>A minor improvement opportunity (IO15) was identified during the site visit to improve the condition of one of the sediment fences. Evidence of repairs were provided for closeout.</p> <p>No tracking of mud observed during the site visit, however a complaint relating to tracking of mud from the site was made on the 11/11/2022 (refer to Section 3.10 for details).</p>
Land (contamination)	N/A – no unexpected contaminated material finds.
Waste	<p>Waste is being managed appropriately onsite in terms of containment and sorting. No waste was observed during the site visit. No litter on the site, or on the adjacent street, was noted.</p>
Heritage	N/A – no unexpected heritage item finds.
Traffic	<p>No traffic complaints recorded. Traffic access and flow adjacent to the project has been maintained. No parking of construction vehicles was observed in local roads adjacent to the site (100 m).</p>
Biodiversity	<p>The audit identified that biodiversity is being managed in accordance with the BDAR and project BMSP. The site visit confirmed that trees on the site are adequately protected given the design and construction constraints. Refer to Section 3.9 for details.</p>

The environmental controls implemented across the site were generally in accordance with the conditions of consent and the requirements of the CEMP and relevant Sub-plans and adequate in controlling environmental risks across the project site.

The lack of project incidents provides further evidence that environmental performance objectives are being met.

3.9 Consultation Outcomes

As requested by DPE, the scope of the independent audit included additional focus on assessing compliance with requirements relating to:

- a. NSW Planning's Independent Audit Post Approval Requirements (Conditions C35-C39): this audit meets these requirements.
- b. Tree protection and the project's management of the Cumberland Plain Woodland.

The key conditions relevant to point b, and the audit findings are presented in Table 11. Evidence assessed included documentation, the site inspection and interviews.

The monitoring and reporting for Cumberland Plain Woodland captured within the BDAR as part of the EIS processes for the GHS Project will serve as the baseline against which Section 3.2.2 and Section 3.5.1 of the BMSP will be measured each year.

Overall, the management of tree protection and the Cumberland Plain Woodland has been in compliance with the consent, EIS documentation and management plans, and the required outcomes have been achieved.

Table 11: Tree protection and the management of the Cumberland Plain Woodland.

Condition	Documentation evidence	Implementation evidence
B21b) Compliant	Addressed in BMSP Section 3.1 Table 1 which identifies the Management Zones within the school site and management measures, as outlined in the BDAR. The Cumberland Plain Woodland is identified as Zone 1.	<ul style="list-style-type: none"> Appropriate fencing has been instated along the boundary of the development and the Cumberland Plain Woodland, in compliance with the approved plans. An extended tree protection zone (TPZ) installed for one tree close to the boundary (see Appendix D: Photo 10) No Go signage installed (see Appendix D: Photo 10) No evidence of access to the area or damage to trees was observed during the site visit.
B21c) Compliant	Management measures for the pre-construction phase are provided in Section 3.2, the construction phase in section 3.3 and post construction phase 3.4. Measures align with the BDAR and BMP. Responsibilities are discussed in section 3.1.3.	NA
B21d) Compliant	As above. Section 3.3 is consistent with the measures identified in Section 5.3 of the BDAR and BMP.	NA
C19 Not triggered	Not triggered: The trees listed under this condition are part of the carpark works, which had not been initiated at the time of the first audit. To be reviewed in the next audit.	NA
C20a) Compliant	Threes approved, with only two removed to date. Aim is to maintain the third if possible. Appropriately qualified arborist supervised the tree removal of two approved trees (73 and 323) on site on the 2 August 2022.	<ul style="list-style-type: none"> All TPZs installed, maintained and appropriate signage (noting additional labelling requested as IO16). In most instances the extent of the TPZ are less than the 5 m recommended in the BMSP due to construction and/or design constraints.

Condition	Documentation evidence	Implementation evidence
	The 14/07/2022 arborist report confirms that all tree protection fencing with the changes for construction was approved according to the DA with BCC, and tree protection measures are to be instated for the duration of construction.	<ul style="list-style-type: none"> Trees appear to be undamaged and in good condition. Mulch from the removed trees has been applied to the trees, and trees are inspected by the arboriculturist on a regular basis. No parking or heavy storage in tree drip zones observed. Appendix D: Photos 9-13
C20b) and c) Not triggered	Not triggered: No existing trees along the site boundary.	NA
C20d) Not triggered	Not triggered. Not accessed to date. Likely at the end of construction during landscaping. To be reviewed in future audits.	<ul style="list-style-type: none"> No evidence of access to the TPZ or Cumberland Plan Woodland observed during the site visit. Appropriate fencing and signage.

3.10 Complaints

The management of enquiries and complaints in relation to the project are detailed in Section 6.5 of the Community Communication Strategy (CCS). SINSW is responsible for managing complaints and maintaining the complaints register for the development.

The CCS states that during project delivery, a complaint is defined as construction impacts, including safety, dust, noise, traffic, congestion, loss of parking, contamination, loss of amenity, hours of work, property damage, property access, service disruption, conduct or behaviour of construction workers, other environmental impacts, unplanned or uncommunicated disruption to the school.

If a phone call, email or face-to-face complaint is received during construction, it will be acknowledged within 2 working days and logged in the *Customer Relationship Management (CRM) software*, actively managed, closed out and resolved by SINSW within 10 days, where practicable. Where complaints are unable to be resolved within this timeframe the complainant will be provided with regular updates regarding the complaint resolution process.

The following contact details are provided on the project website

(<https://www.schoolinfrastructure.nsw.gov.au/projects/j/john-palmer-public-school-upgrade.html>) as:

- Mail: GPO Box 33, Sydney, NSW 2001
- Email: schoolinfrastructure@det.nsw.edu.au

No phone number is provided. These details are not provided in the CCS and the website does not specify that the above contacts can be used for raising complaints.

As required under condition A24a)(viii) the complaints register is maintained on the project website at : <https://www.schoolinfrastructure.nsw.gov.au/projects/g/glenwood-high-school-upgrade.html#category-reports>.

The register identified that two complaints have been recorded for the project since the start of construction on the 5 October 2022. Details of the complaints, timeline of communications and responses are provided in Table 12 and are based on documentation provided under the RFI.

It is noted that the online complaints register has the incorrect date for the first complaint (10/10/2022 instead of 26/09/2022), with the noise complaint being made prior to the start of construction under SSD 23512960 (05/10/2022) when works were being conducted under the DA. There was a significant delay (15 days/ 10 working days) between Department of Education (DE) receiving the details of the complaint from BCC and the information being forwarded to the RCC and Jacobs project team. RCC provided a clear response on the same day. It could not be determined from the information provided when the response was issued to BCC or the complainant. This timeframe does not meet the stated criteria in the CCS. Based on the information provided, the complaint may not have been a result of the works at the school.

The complaints register also states the incorrect date for the second complaint relating to tracking of mud from the site (14/11/2022 instead of 11/11/2022). RCC conducted an investigation and provided a detailed response on the 15/10/2022. The complaints registers identifies that response was provided on the 16/11/2022, within the 10 days identified in the CCS, and included the implementation of additional controls.

Based on the evidence provided for this audit, in both instances the details of the complaints as passed on from the EPA and BCC, including the exact time and location, are not clear. This makes it difficult for RCC to conduct a detailed investigation.

Furthermore, the fact that neither complaint was raised directly to DE or the project contact, may indicate that the mechanisms for raising a complaint are not clear to the public. This issue has been raised in other SINSW compliance audits.

Table 12: Details of complaints

Complaint Date	Nature of Complaint	Details of Complaint	Response Date	Response	Status
26/09/2022 (Note: complaints register states 10/10/2022)	Adherence to standard working hours/Noise	<p>26/09/2022: Email from BCC to DE – regarding Forman Avenue, Glenwood NSW 2768 advising that an adjoining property owner reported that the construction may not be proceeding in accordance with the Complying Development Certificate's Conditions of Consent.</p> <p>Adherence to standard working hours/ Noise concerns. Contact details were provided to the complainant should they deem it necessary to contact you.</p> <p>10/10/2022: DE forwarded the email from BCC to the Jacobs and RCC project team.</p>	19/10/2022	<p>10/10/2022: RCC confirmed that work had not taken place outside the approved construction hours in accordance with the planning approval, and that works near Forman Ave did not commence on 06/10/22 and have been limited too within the school grounds.</p> <p>RCC noted that the complaint was dated 26/09/22; the only works being undertaken on this date was refurbishment and demolition works within Block D and the staff carpark off Forman Ave. A photo of another construction site at 21 Forman Ave was also provided.</p> <p>It could not be determined from the information provided when the response was issued to BCC or the complainant.</p>	Closed
11/11/2022 (Note: complaints register states 14/10/2022)	Sediment erosion controls/water pollution	<p>11/11/2022¹: Email to DE from NSW EPA REF-NO-17107: "Two further complaints from members of the public have come to Council's attention, regarding ongoing water pollution concern. The construction project for Glenwood High school is alleged to have inadequate sediment control and is tracking mud to the road".</p> <p>14/10/2022: DE forwarded the details of the complaint to the Jacobs and RCC project team.</p>	16/11/2022	<p>15/11/2022: RCC responded via email outlining activities and truck movements on the site on the 11/11/2022, the project ERSED controls, including those to prevent tracking of dirt only public roads. Photographic evidence of the site conditions on the day were also provided (site appears dry).</p> <p>The responses stated that a street sweeper will now be used regularly alongside the manual sweeping activities undertaken daily and the contractor will maintain evidence of road cleaning.</p>	Closed

¹ Note that the date that the EPA contacted DE could not be determined as it was not included in the documentation provided.

3.11 Incidents

Incident management is detailed in Sections 4.12 and 4.13 of the CEMP and includes responsibilities for managing incident and reporting, incident classification, duty to notify the EPA for pollution incidents, investigation and non-conformances. This section does not mention the relevant conditions of consent (i.e. A26, A27 and Appendix 2: 1-4), including the requirement to notify DPE (via reporting to SINSW) for 'notifiable' incidents.

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.

At the time of the audit, one incident was recorded for the 06/10/2022 which involved the cutting of a live gas copper pipe during the preparation works to Block E, which had not been detected by the services scan. The pipe was isolated from the gas main, investigated, then reinstated.

RCC correspondence indicates that Jacobs was notified of the incident on the 06/10/2022, six days before the Incident Notification (under condition A26) and incident report (condition 27) was lodged with DPE on the 12/10/2022. Due to the extended timeframe for notification this was deemed non-compliant for condition A26. A more detailed report was prepared by RCC, dated 17/10/2022. This report was submitted to DPE on the 18/10/2022.

3.12 Actual versus Predicted Environmental Impacts

The purpose of this section addresses the predicted construction impacts and suggested mitigation and management measures from the EIS versus actual impacts and mitigation measures implemented as part of the project delivery. Environmental impacts associated with various aspects of the development, and the mitigation measures, are presented in Appendix C of the EIS.

Impacts assessed in the audit included those with a medium or high-risk score, as identified in the risk assessment. These are presented in Table 13, along with an assessment against the actual impacts of the project identified through the audit.

Table 13: Actual versus predicted environmental impacts for construction

EIS – Impacts identified	Assessment of actual impacts
<p>Construction noise – Section 6.9 and Appendix V</p> <p>No receivers are anticipated to be highly noise affected (i.e., exceed an LAeq,15min of 75 dB(A)).</p> <p>School buildings within the site are predicted to be highly noise affected, except for the childcare centre which will not be highly noise affected,</p> <p>Construction traffic would have a negligible impact, and will continue to meet the RNP criteria for surrounding residences.</p>	<p>One noise/ out of hours works complaint prior to the start of construction, however, it could not be determined if this was due to the project or another development site adjacent to the location stated in the complaint. See section 3.10 for details.</p> <p>High noise activities such as rock breaking, rock hammering, sheet piling and pile driving have not occurred (and are not likely to).</p> <p>Noise mitigation measures stated in the CNVMSP are in place (e.g. induction, limited use of beepers on vehicles).</p>

EIS – Impacts identified	Assessment of actual impacts
<p>Traffic, Transport and Accessibility – Section 6.7 and Appendix P</p> <p>The peak number of trucks 10/day can be accommodated by the local network subject to appropriate management.</p> <p>Not be sufficient parking for workers on-site, and workers will need to park in the local area with possible implications on residents. Two options considered, including:</p> <ul style="list-style-type: none"> • Use the vacant parking within Glenwood Reserve (110 vacant spaces each day) • Use of prevalent unrestricted parking along Glenwood Park Drive, Forman Avenue and Shaun Street. 	<p>No traffic or accessibility complaints or incidents recorded. Vehicle movements associated with construction are relatively low, and busier periods are limited to specific activities (e.g. concrete pours).</p> <p>Construction vehicles are subject to local traffic control by qualified traffic controllers (observed during the site visit). Driver Code of Conduct (CEMP Section 5.5) issued to drivers (verified during site visit).</p> <p>EIS management measures for construction worker parking are addressed in Section 5.5 of the CEMP – Construction Worker Transportation Strategy. Includes public transport and on-street options. The later includes permitted locations, distance from site and responsibility for adhering to local parking provisions. The Strategy is issued to workers during induction.</p>
<p>Biodiversity – Section 6.8 and Appendices S and T</p> <p>The development will impact 0.03 ha of planted native/exotic vegetation, and 0.13 ha of exotic grassland, neither of which represent threatened ecological communities, or habitat for threatened species.</p> <p>The Cumberland Plain Woodland is located outside of the development site and will not be directly impacted.</p>	<p>Appropriate qualified person assessed and attended tree removal at the site (Tree Removal Certificate sighted).</p> <p>All TPZs installed, maintained and appropriately labelled (noting additional labelling requested as IO16). The extent of the TPZ are less than the 5 m recommended in the BMSP in many instances due to construction design constraints. Trees appear to be undamaged and in good condition, are mulched using removed trees, and inspected by the arboriculturist on a regular basis. No parking or heavy storage in drip zones observed.</p> <p>Appropriate fencing has been instated along the boundary of the development and the Cumberland Plain Woodland, in compliance with the approved plans. An extended TPZ installed for one tree close to the boundary and No Go signage installed (see Appendix D: Photo 10). No evidence of access to the area or damage to trees was observed during the site visit.</p>

Overall, the actual impacts of the development at the time of the audit were equivalent to or less than the assessed or predicted impacts identified in the project EIS. Impacts have been mitigated through the implementation and maintenance of appropriate and effective management measures.

3.12.1 Project Boundary

The site visit and other evidence (e.g. Crown certificate) confirmed that the project boundary conforms with the approved boundary as shown in the approved plans.

3.13 Site Inspection

A site inspection was conducted on 15 December 2022 during which observations on the project's environmental performance were recorded and photographs taken. During the walk over of the site issues relating to the following improvement opportunities were raised and discussed with the contractor Project Manager:

- Repairs to the sediment fence located to the south of the site office (refer to Appendix D, Photos 5 and 6) (IO15). This has subsequently been closed out (refer to Appendix D, Photos 40 and 41)

- Additional No Access/No Go signage in TPZ (refer to Appendix D, Photos 9-13) (IO16). This has subsequently been closed out (refer to Appendix D, Photos 34-39).

Project staff were responsive to recommendations identified to rectify deficiencies. Environmental performance and housekeeping on the site was observed to be generally good.

3.14 Site Interviews

Site interviews were structured around the SSD 23512960 conditions of consent and how the project demonstrates compliance with each condition and assessing understanding of environmental risk and performance management requirements on site.

Overall, the interviews demonstrated that the project personnel had a good understanding of environmental risks and controls associated with the project, and a clear understanding of the EMS in place, and the management of required documentation, such as the waste register, training and induction records, site inspections.

Communication processes were discussed to ensure mechanisms are in place to ensure subcontractor compliance with SSD 23512960 and the CEMP and Sub-plans. This is facilitated through daily pre-starts and weekly meetings, as well as document sharing sites and site noticeboards.

Interviews also indicated a positive culture in terms of incident reporting (including near misses) and addressing corrective actions in a timely manner. T

3.15 Previous Annual Review or Compliance Report Recommendations

There has been no previous compliance reports or annual reviews for the project.

3.16 Improvement Opportunities

Improvement opportunities (IOs) identified through the audit process are presented in Table 14. Consideration of these suggestions may better manage risks and enhance environmental performance of the project. Of the 21 opportunities for improvement two have been closed out.

Table 14: Opportunities for improvement

Number	Improvement Opportunity	Status
IO1	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.	Open
IO2	Change the name of Appendix 6.9 in the CEMP to Community Communication Strategy.	Open
IO3	Update the document control table in the CCS with the correct date.	Open
IO4	Include the requirement 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.	Open
IO5	Specify that the formation of community-based forum is not required under the consent."	Open

Number	Improvement Opportunity	Status
IO6	Update the CEMP Revision Register with the correct information regarding the revisions.	Open
IO7	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.	Open
IO8	Update the compliance table in section 1.2 to reference section 6.1 not 4.1.	Open
IO9	Update the name of Appendix 6.11 of the CEMP to FERMSP	Open
IO10	Update the name of Appendix 6.10 of the CEMP to BMSP	Open
IO11	Include details in the CTPMSP on how the Driver Code of Conduct will be communicated.	Open
IO12	Include that there are no residential buildings within 30m of site boundary in the CNVMSP.	Open
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.	Open
IO14	Update WMSP Section 1 Table 2 to reference Section 6.	Open
IO15	Repair the sediment fence that is in poor repair to the south of the site office.	Closed (see Appendix D, Photos 40 and 41)
IO16	Additional No Go Zone signage on the exclusion fencing for the Cumberland Plain Woodland was requested.	Closed (see Appendix D, Photos 34-39).
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 complaints management and reporting.	Open
IO18	Update Section 4.3 of the CEMP to include the correct legislation.	Open
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. 	Open
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).	Open
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.	Open

4 Recommendations

4.1 Non-Compliance Recommendations

Recommendations to rectify non-compliances identified during the audit are presented in Appendix E. Of the seven recommendations associated with the eight non-compliances identified in Section 3.4, one has been closed out.

Site personnel provided a quick and effective response to rectifying and closing out recommendations and provided adequate evidence of implementation.

Table 15: Non-compliance recommendations

NC Number	CoC no.	Requirement	Recommendation	Status
NC1	A2b)	The development may only be carried out: (b) in accordance with all written directions of the Planning Secretary;	Ensure all feedback from SSD-23512960-PA-3 RFI Attachment A is addressed in the project management plans.	Open
NC2	A24a)(viii) and A24b)	A24a): 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: (viii) a complaints register, updated monthly; A24b): keep such information up to date, to the satisfaction of the Planning Secretary and publicly available for 12 months after the commencement of operations.	DE/SINSW to ensure the projects complaints register on the website is updated monthly and information is accurate.	Open
NC3	A24b)	The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	DE/SINSW to ensure that Incident notifications are issued to the Department as soon as possible after an incident is identified (within 1 working day recommended).	Open
NC4	B18c)	The Construction Waste Management Sub-Plan (CWMSP) must address, but not be limited to, the procedures for the management of waste including the following: (c) confirmation of the contamination status of the development areas of the site based on the validation results.	For clarity, include a statement and/or summary of the contamination status findings from Douglas Partners in the CWMSP.	Closed
NC5	C36	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Approval received (see Appendix A).	Closed

4.2 Improvement Opportunities

Of the 21 improvement opportunities identified in Section 3.16, sufficient evidence has been provided to close-out two. The majority of the improvement opportunities relate to minor changes the site CEMP and Sub-plans and could generally be considered administrative.

4.3 Key Strengths

The key strengths identified in relation to the management of the project include: The key strengths identified in relation to the management of the project include:

- Effective communications regarding environmental management between the head contractor (RCC) and subcontractors working on the project
- A good understanding of the project requirements, including the conditions of consent, by RCC
- A positive response from the project team in relation to adopting processes and changes that promote ongoing improvement.

5 Conclusion

This Independent Audit Report satisfies the requirements of SSD 23512960 conditions of consent C35 and C38. The audit has been conducted in accordance with the *Independent Audit Post Approval Requirements* (DPIE, May 2020) and the AS/NZS ISO 19011:2014 – *Guidelines for Auditing Management Systems*. The audit report documents the outcomes of the review of compliance undertaken by Arcadis.

The audit process comprised of:

- The issue of the RFI Register and subsequent document review
- An opening and closing meeting and site visit conducted on the 7 October 2020
- Post-site visit document review and follow up
- Issuing of draft audit report
- Post-draft audit report review and provision of additional documentation
- Issuing of Final Report (this report).

It was found that the project was generally compliant with the conditions of consent and construction activities are generally being managed in accordance with the requirements of SSD 23512960.

Non-compliances were identified in respect of:

- A2: not complying with all written directions of the Planning Secretary (NC1)
- A24: not uploading/updating information on the project webpage in accordance with the requirements (NC2)
- A26: failing to notify the Planning Secretary immediately after becoming aware of an incident (NC3)
- B18: not including confirmation of the contamination status of the development areas of the site in the CWMS (NC4 - closed)
- C36: failure to obtain approval from the Planning Secretary for the proposed independent auditor prior to the commencement of an Independent Audit (NC5 - closed). Adequate evidence has subsequently been provided to close this out.

Of the 21 improvement opportunities presented, most relate to improvements to the CEMP and Sub-plans, with only a couple being due to requirements stated in the not being adequately met.

The audit identified an effective EMS, risk management, and monitoring and inspections. Of note is the positive response to incident management and the quick and positive response to closing out weaknesses.

The audit concludes that the Glenwood High School upgrade project is generally being undertaken in compliance with the requirements of SSD 23512960.

APPENDIX A Letter of Approval of Independent Auditor

Department of Planning and Environment

Schools Infrastructure NSW
via the Planning Portal

19/11/2022

Attention: Grant Anderson, Senior Planning Compliance Officer

Dear Grant

**Glenwood High School Upgrade (SSD-23512960)
Independent Audit - Auditor Approval**

I refer to your request (SSD-23512960-PA-7) for the Secretary's approval of suitably qualified persons to undertake the Independent Environmental Audit for the Glenwood High School Upgrade approved under SSD-23512960 ("**Approval**").

The Department of Planning and Environment's Planning Group ("**NSW Planning**") has reviewed your submission, and in accordance with Condition C36 of the Approval, the Secretary agrees to the appointment of Ms Denise Day of Arcadis Australia Pacific Pty Ltd, as the lead auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Further, the NSW Planning notes that the Exemplar Global certification for Ms Day may expire before the final audit for this project has been completed. Please note that this approval is conditional upon the approved auditor maintaining certification as a lead or principal auditor with a relevant industry body.

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to NSW Planning, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact Alfarid Hussain on 02 9274 6456 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Rob Sherry".

Rob Sherry
Team Leader Compliance - Government Projects
Compliance

As nominee of the Planning Secretary

APPENDIX B Evidence of Consultation

From: [Elizabeth Williamson](#)
To: [Day, Denise](#)
Cc: [Damien Smith](#)
Subject: RE: Glenwood High School Independent Environmental Audit (SSD 23512960)
Date: Wednesday, 7 December 2022 3:08:14 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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Good afternoon Denise,

Thank you for consulting with the Department of Planning and Environment (NSW Planning) on the scope of the audit for Glenwood High School (SSD 23512960).

Please ensure the audit is undertaken in accordance with Conditions C35-C39 and NSW Planning's Independent Audit Post Approval Requirements. In addition to the above, please also focus on tree protection and the project's management of the Cumberland Plain Woodland.

NSW Planning also requests that you contact Council, which it appears from your email that you already have.

When consulting with NSW Planning for future audits, please direct your correspondence to compliance@planning.nsw.gov.au rather than individual officers. This will ensure your email gets actioned, particularly when officers are on leave.

Please call me on the details provided below if you have any questions.

Kind regards,

Elizabeth Williamson

Senior Compliance Officer

Planning & Assessment | Department of Planning and Environment

T 02 8289 6610 | **M** 0447 041 325 | **E** elizabeth.williamson@planning.nsw.gov.au

Locked Bag 5022 | PARRAMATTA NSW 2124

www.dpie.nsw.gov.au

Please note my work days are Tuesday, Wednesday & Thursday.



The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

From: Day, Denise <Denise.Day@arcadis.com>

Sent: Tuesday, 6 December 2022 5:19 PM

To: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>; Statutory Planning Compliance <SPCompliance@det.nsw.edu.au>

Subject: RE: Glenwood High School Independent Environmental Audit (SSD 23512960)

Hi Alfarid

I'm just following up on the Departments input on the scope for the independent environmental audit for Glenwood High School approved under SSD 23512960.

Please note I have already been in contact with Blacktown City Council for input.

Kind regards

Denise Day (she/her) BSc (Hons) PgD (EIS)
Principal Environmental Consultant
Arcadis Australia Pacific
Level 16, 580 George Street, Sydney, NSW | 2000 | Australia
T +61 (2) 8907 9178
T +61 (0) 422 384 068
www.arcadis.com

Please note: work days are Monday to Thursday.

From: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>
Sent: Thursday, 17 November 2022 10:30 AM
To: Statutory Planning Compliance <SICompliance@det.nsw.edu.au>; Day, Denise <Denise.Day@arcadis.com>
Cc: Grant Anderson <Grant.Anderson18@det.nsw.edu.au>; Elizabeth Williamson <Elizabeth.Williamson@planning.nsw.gov.au>; Damien Smith <Damien.Smith@dpie.nsw.gov.au>
Subject: RE: Glenwood High School Independent Environmental Audit (SSD 23512960)

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Thanks, Kendal!

Kind regards,

Alfarid Hussain

Compliance Officer
Development Assessment
Department of Planning and Environment

T 02 9274 6456 | M 0436 681 733 | E Alfarid.Hussain@planning.nsw.gov.au
www.dpie.nsw.gov.au
Locked Bag 5022|Parramatta NSW 2124

Working days Monday to Friday, 09:00am - 5:00pm



The Department of Planning and Environment acknowledges that it stands on Country which always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.

If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au.

The Department has recently upgraded the Major Projects Website to improve the timeliness and transparency of its post approval and compliance functions. As part of this upgrade, proponents are now requested to submit all post approval and compliance documents online, via the Major Projects Website. To do this, please refer to the instructions available [here](#).

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From: Statutory Planning Compliance <SICompliance@det.nsw.edu.au>
Sent: Thursday, 17 November 2022 11:27 AM
To: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>; Day, Denise <Denise.Day@arcadis.com>

Cc: Grant Anderson <Grant.Anderson18@det.nsw.edu.au>

Subject: RE: Glenwood High School Independent Environmental Audit (SSD 23512960)

Hi Alfarid,

I confirm that approval has not been sought however this is currently being actioned by the Project team.

Many thanks for bringing this to our attention.

Regards

Kendal Caynes

Manager Planning Compliance | Technical Services | Business Enablement | School Infrastructure NSW

0439 271 733 | Kendal.Caynes1@det.nsw.edu.au | education.nsw.gov.au

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Education

I acknowledge the homelands of all Aboriginal people and pay my respect to Country.

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From: Alfarid Hussain <Alfarid.Hussain@planning.nsw.gov.au>

Sent: Thursday, 17 November 2022 10:52 AM

To: Statutory Planning Compliance <SICompliance@det.nsw.edu.au>; Day, Denise <Denise.Day@arcadis.com>

Subject: RE: Glenwood High School Independent Environmental Audit (SSD 23512960)

You don't often get email from alfarid.hussain@planning.nsw.gov.au. [Learn why this is important](#)

[External Email] This email was sent from outside the NSW Department of Education. Be cautious, particularly with links and attachments.

Hi Denise and Schools Infrastructure NSW,

Thank you for contacting NSW Planning to consult regarding the scope of an upcoming independent environmental audit for Glenwood High School approved under SSD 23512960.

I have not been able to locate the auditor agreement letter for this project – can you please forward me a copy of the letter?

Kind regards,

Alfarid Hussain

Compliance Officer
Development Assessment
Department of Planning and Environment

T 02 9274 6456 | M 0436 681 733 | E Alfarid.Hussain@planning.nsw.gov.au
www.dpie.nsw.gov.au
Locked Bag 5022|Parramatta NSW 2124

Working days Monday to Friday, 09:00am - 5:00pm



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From: Day, Denise <Denise.Day@arcadis.com>
Sent: Monday, 7 November 2022 9:47 AM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Branks, Kristen <Kristen.Branks@arcadis.com>
Subject: Glenwood High School Independent Environmental Audit (SSD 23512960)

Good morning

I have been engaged by Schools Infrastructure NSW as the approved Independent Auditor on the Glenwood High School upgrade project (SSD 23512960). In accordance with the Independent Audit Post Approval Requirements (IAPAR) (DPIE, 2020) I am required to consult with the Department regarding the scope of audit, and to determine if there are other parties or agencies to be consulted.

Accordingly, can you please provide the following:

- Inputs on the audit scope, including issues or conditions of consent for focus
- Details of who is to be consulted as part of the audit process.

Please do not hesitate to call should you wish to discuss.

Kind regards

Denise Day (*she/her*) BSc (Hons) PgD (EIS)
Principal Environmental Consultant
Arcadis Australia Pacific
Level 16, 580 George Street, Sydney, NSW | 2000 | Australia
T +61 (2) 8907 9178
T +61 (0) 422 384 068
www.arcadis.com

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From: [Judith Portelli](#)
To: [Day, Denise](#)
Cc: [Bertha Gunawan](#); [Alan Middlemiss](#); [Nadeem Shaikh](#); [Laith Almoil](#)
Subject: RE: Independent Environmental Audit Glenwood High School upgrade project (SSD- -23512960) - consultation
Date: Monday, 12 December 2022 9:46:36 AM
Attachments: [image003.png](#)
[image001.png](#)

Hi Denise

I have asked my officers to advise you directly and if they have not informed you , it can be assumed that they don't have any issues to report

Regards JUDY



Judith Portelli
Manager Development Assessment

9839 6228

From: Day, Denise <Denise.Day@arcadis.com>
Sent: Monday, 12 December 2022 10:44 AM
To: Judith Portelli <Judith.Portelli@blacktown.nsw.gov.au>
Subject: RE: Independent Environmental Audit Glenwood High School upgrade project (SSD- -23512960) - consultation

Good morning Judith

I'm just following up on any comments BCC have on the scope for the Glenwood High School independent environmental audit. I will be conducting the site audit this Thursday and will require any comments by midday Wednesday.

Kind regards

Denise Day (*she/her*) BSc (Hons) PgD (EIS)
Principal Environmental Consultant
Arcadis Australia Pacific
Level 16, 580 George Street, Sydney, NSW | 2000 | Australia
T +61 (2) 8907 9178
T +61 (0) 422 384 068
www.arcadis.com

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From: Judith Portelli <Judith.Portelli@blacktown.nsw.gov.au>
Sent: Wednesday, 16 November 2022 9:50 AM
To: Day, Denise <Denise.Day@arcadis.com>
Subject: RE: Independent Environmental Audit Glenwood High School upgrade project (SSD- -23512960) - consultation

Hi Denise, I have asked my team to advise you directly if they have any issues they want raise with you regards JUDY



Judith Portelli
Manager Development Assessment

9839 6228

From: Day, Denise <Denise.Day@arcadis.com>
Sent: Wednesday, 16 November 2022 10:28 AM
To: Judith Portelli <Judith.Portelli@blacktown.nsw.gov.au>
Cc: Branks, Kristen <Kristen.Branks@arcadis.com>
Subject: Independent Environmental Audit Glenwood High School upgrade project (SSD- -23512960) - consultation

Hi Judith

I have been engaged as the Independent Environmental Auditor under the conditions of consent for the Glenwood High School upgrade project (SSD- -23512960). The audit will be conducted in accordance with the Department of Planning and Environment (DPE) document *Independent Audit Post Approval Requirements* (IAPAR)(May 2020). Under IAPAR the auditor must consult with the Department, who may request that other parties or agencies are consulted in the development of the audit scope. Discussion with DPE has identified that consultation is conducted with Blacktown City Council.

Can you please advise if BCC would like to provide any comments or inputs to the audit scope. This may be a specific focus (e.g. stormwater) or consent condition/s. Any comments will be required by **Wednesday 7 December**.

Please do not hesitate to contact me should you have any questions.

Kind regards

Denise Day (*she/her*) BSc (Hons) PgD (EIS)
Principal Environmental Consultant
Arcadis Australia Pacific
Level 16, 580 George Street, Sydney, NSW | 2000 | Australia
T +61 (2) 8907 9178
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APPENDIX C Audit Agenda

AGENDA

Issue date 15/12/2022
Issue to RCC, Jacobs, SINSW
Subject Glenwood High School Independent Environmental Audit – Site Audit Opening Meeting
Meeting date 15/12/2022
Time 9.00 – 9.30 am
Location Onsite
Distribution Distribution

ITEM	DETAIL
1	Audit objectives <ul style="list-style-type: none">• To determine compliance with the conditions of consent
2	Audit scope <ul style="list-style-type: none">• Compliance with CoC (relevant to the stage of development), post approval documents• Environmental performance of the development – actual vs predicted impacts, approved boundary, incidents and complaints, consultation issues, agency/ stakeholder feedback.• Review of the adequacy of those plans and whether they are being implemented on-site (DPE consultation request)
3	Required resources <ul style="list-style-type: none">• Documentation• Interviews: Contractor Project Manager and Environment Manager
4	Audit methodology <ul style="list-style-type: none">• IAPAR (DPIE, May 2020)• Document review, site inspection, on-site interviews• Evaluation of compliance, audit findings and recommendations/ opportunities for improvement• Reporting
5	Key dates <ul style="list-style-type: none">• 15/12/2022: Opening Meeting• 15/12/2022: Site audit• 17/01/2023: Draft audit report• 31/01/2023: comments from client• 06/02/2023: Final audit report
6	Questions?

Opening Meeting Attendees – 15/12/2022

Name	Role
Marcus Kraefft	Jacobs - PM
JOEL CARBROUGH	RCC - PROJECT ^{SNR} PROJECT ENGINEER
Viji Patel	Jacobs - SPM.
Josh Stubbs	RCC - Proj Engineer
Jeremy Stott	SINSW (Teams)
Nicholas Murphy	RCC - WHSE Advisor

Closing Meeting Attendees – 29/09/2022

Name	Role
Joshua STUBBS	RCC - Project Engineer.
Marcus Kraefft	Jacobs - PM
Nicholas Murphy	RCC - WHSE Advisor
JOEL CARBROUGH	RCC - SPM
AMIT RAMPAL	SINSW - ASSISTANT PD (Teams)
Viji Patel	Jacobs - SPM

APPENDIX D Site Visit Photographs

ERSED Controls



Photo 1: Coir sediment protection outside the boundary fence along Glenwood Park Drive



Photo 2: Coir sediment protection on the drain along Glenwood Park Drive (opposite the site entrance)



Photo 3: Coir sediment protection on the drain along Glenwood Park Drive (adjacent to site)



Photo 4: Basin with wash-off water from the rumble grid at the site entrance



Photo 5: Sediment fencing along the eastern site boundary (south of the site office)



Photo 6: Sediment fencing along the eastern site boundary, south of the site office (noting poor condition)



Photo 7: Sediment fence along the northern boundary of the topsoil stockpile



Photo 8: Sediment fence along the northern boundary of the site

Tree Protection Zones (TRZ)



Photo 9: TPZ of retained tree adjacent to the northern boundary



Photo 10: TPZ on the southern side of the boundary of Vegetation Zone 1



Photo 11: Boundary fence along Vegetation Zone 1 (fence extension to provide a 5m TPZ from the tree located inside the fence)



Photo 12: TPZ in the southern portion of the site



Photo 13: TPZ in the southern portion of the site

Site Signage

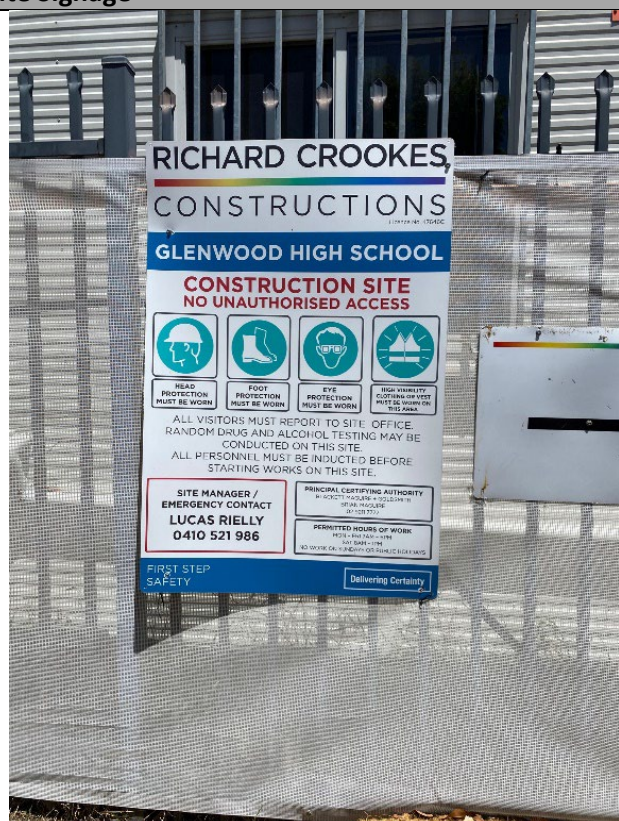


Photo 14: Site signage located on the eastern boundary

Emergency Response



Photo 15: Emergency Evacuation Plan



Photo 16: Emergency Response Station adjacent to the chemical storage cage (along the northern site boundary)



Photo 17: Emergency Response Station located near the site office



Photo 18: Emergency Response Station located on the eastern site boundary adjacent to Vegetation Zone 1



Photo 19: Emergency spill kit located near the site office

Site Notice Boards



Photo 20: Available Environmental Management Plans and Emergency Response Team



Photo 21: Daily pre-start notice board tracking construction stages and daily issues



Photo 22: Environmental notice board, including evacuation plan, emergency response and contacts, site inspections and toolbox records

Dirt Tracking and Dust



Photo 23: site entrance rumble grid and wheel wash (water drains to a small holding pond behind the fencing)



Photo 24: Hose and pump for the wheel wash, adjacent to the rumble grid